



CABINET

TUESDAY, 19 JULY 2016

10.00 AM COUNCIL CHAMBER, COUNTY HALL, LEWES

MEMBERSHIP - Councillor Keith Glazier (Chair)
Councillors Nick Bennett, Bill Bentley, Chris Dowling, David Elkin (Vice Chair), Carl Maynard, Rupert Simmons and Sylvia Tidy

A G E N D A

- 1 Minutes of the meeting held on 28 June 2016 (*Pages 3 - 4*)
- 2 Apologies for absence
- 3 Disclosures of interests
Disclosures by all members present of personal interests in matters on the agenda, the nature of any interest and whether the member regards the interest as prejudicial under the terms of the Code of Conduct.
- 4 Urgent items
Notification of items which the Chair considers to be urgent and proposes to take at the appropriate part of the agenda. Any members who wish to raise urgent items are asked, wherever possible, to notify the Chair before the start of the meeting. In so doing, they must state the special circumstances which they consider justify the matter being considered urgent.
- 5 Proposed Closure of Rodmell CE Primary School (*Pages 5 - 80*)
Report by Director of Children's Services
- 6 Proposed Closure of Pells CE Primary School (*Pages 81 - 178*)
Report by Director of Children's Services
- 7 Update on the Libraries Transformation Programme (*Pages 179 - 272*)
Report by the Director of Communities, Economy and Transport
- 8 Connecting 4 You Programme (*Pages 273 - 286*)
Report by Director of Adult Social Care and Health
- 9 Three Southern Counties Devolution Update (*Pages 287 - 292*)
Report by Chief Executive
- 10 South East Seven Update (*Pages 293 - 300*)
Report by Chief Executive
- 11 Internal Audit Services: Annual Report and Opinion 2015-16 (*Pages 301 - 316*)

Report by Chief Operating Officer

12 Internal Audit Strategy 2016/17 and Annual Plan (*Pages 317 - 332*)

Report by Chief Operating Officer

13 Any other items considered urgent by the Chair

14 To agree which items are to be reported to the County Council

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11 July 2016

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CABINET

MINUTES of a meeting of the Cabinet held on 28 June 2016 at Council Chamber, County Hall, Lewes

PRESENT Councillors Keith Glazier (Chair)
 Councillors Nick Bennett, Bill Bentley, Chris Dowling, David Elkin (Vice
 Chair), Carl Maynard, Rupert Simmons and Sylvia Tidy

Members spoke on the items indicated

Councillor Blanch	- items 5 and 6 (minutes 8 and 9)
Councillor Charlton	- item 5 (minute 8)
Councillor Field	- items 5 and 6 (minutes 8 and 9)
Councillor Forward	- item 5 (minute 8)
Councillor Howson	- item 5 (minute 8)
Councillor Pursglove	- item 6 (minute 9)
Councillor Shuttleworth	- item 6 (minute 9)
Councillor St Pierre	- items 5 and 6 (minutes 8 and 9)
Councillor Ungar	- item 5 (minute 8)
Councillor Webb	- items 5 and 6 (minutes 8 and 9)

6 MINUTES OF THE MEETING HELD ON 24 MAY 2016

6.1 The minutes of the meeting held on 24 May 2016 were agreed as a correct record

7 REPORTS

7.1 Copies of the reports referred to below are included in the minute book.

8 COUNCIL MONITORING REPORT - END OF YEAR 2015/16

8.1 The Cabinet considered a report by the Chief Executive.

8.2 It was RESOLVED to note the latest monitoring position for the Council.

Reason

8.3 The report set out the Council's position and year end provisional outturns for the Council Plan targets, Revenue Budget, Capital Programme, Savings Plan together with risks at the end of March 2016.

9 RECONCILING POLICY PERFORMANCE AND RESOURCES - STATE OF THE COUNTY

9.1 The Cabinet considered a report by the Chief Executive.

9.2 It was RESOLVED to:

- i) agree to the continued development of a three year business and a five year financial plan based on existing priority outcomes and operating principles;
- ii) note that the anticipated financial context for the period 2016/17 to 2018/19 remains with a savings requirement of £70m to £90m;
- iii) agree to continue to develop plans for savings of £17.3m in 2017/18 from the areas of search set out in paragraph 7 of the report for consideration by Cabinet in October 2016;

- iv) note the evidence base on demographics and the policy and resources outlook as set out in the report and in Appendices 2 and 3;
- v) note the developing proposals for lobbying, communications and engagement as set out in paragraph 6 of the report;
- vi) approve the updated current Capital Programme 2016 – 2018 as set out in Appendix 3; and
- vii) note the work in progress to develop a Capital Programme and Strategy for 2018 – 2023 in Appendix 4, which will be considered in full in October

Reason

9.3 The report begins the Council's Reconciling Policy, Performance and Resources process for 2017/18 and beyond

10 ITEMS TO BE REPORTED TO THE COUNTY COUNCIL

10.1 The Cabinet agreed that items 5 and 6 be reported to the County Council

[Note: The items being reported to the County Council refer to minute numbers 8 and 9]

Report to: Cabinet

Date of meeting: 19 July 2016

By: Director of Children's Services

Title: Proposed closure of Rodmell CE Primary School

Purpose: To consider the outcome of the public consultation in relation to the proposed closure of Rodmell CE Primary School and to recommend next steps

RECOMMENDATIONS

Cabinet is recommended to halt the proposed closure of Rodmell CE Primary School and allow the governing body of Rodmell CE Primary School further time to submit a firm and viable proposal that would ensure a sustainable future model for the school for review by the Council during Term 5.

1 Background

1.1 In October 2014 the Lead Member agreed that a review of primary schools should be undertaken in the Lewes area. This was in the context of the Council's principles for planning the provision of education places in East Sussex as set out in the *Education Commissioning Plan 2014 – 2018* and the Council's strategy for school improvement *Excellence for All*. The Local Authority has a duty to ensure there is sufficient provision to meet the predicted demand for places and to also look more widely at the organisation of schools to make sure they are well placed to deliver a high quality education to their local communities.

1.2 The Area Review raised significant concerns about the long term sustainability of Rodmell CE Primary School in terms of the risks to its financial stability, securing good outcomes for pupils and its ability to attract pupils from within its community area. For these reasons and having considered alternative options including federation, amalgamation and academisation, approval was sought from the Lead Member for Education and Inclusion, Special Educational Needs and Disability on 21 March 2016 to consult on a proposal to close Rodmell CE Primary School. The Lead Member agreed that the Children's Services Department (CSD) should consult on the closure of the school but instructed CSD to fully consider any proposals coming from the schools or from other consultees around federation or amalgamation which would lead to a sustainable solution.

1.3 The Diocese of Chichester shares the Council's concerns and agreed that the Local Authority should consult on closure of the school.

1.4 The consultation period commenced on 15 April 2016 and ran until 27 May 2016. A report on the consultation is provided in **Appendix A**. Members must read and have regard to the full version of the consultation report with responses.

1.5 The school is listed in the Designation of Rural Primary Schools (England) Order 2012 (as amended 2015) and is therefore within the designation of "rural" school. Under current Department for Education (DfE) guidance there is a presumption against the closure of rural schools. This does not mean that a rural school will never close, but that the case should be strong and a proposal clearly in the best interests of educational provision in the area.

2 Supporting information

2.1 Pupil Numbers

2.1.1 The average annual birth rate in the Rodmell and Southease Parish in the period 2001/02 (reception year intake 2006/07) to 2010/11 (reception year intake 2015/16) was only

3.4. In the period 2011/12 (reception year intake 2016/17) to 2014/15 (reception year intake 2019/20) the average annual birth rate was even lower at 2.5.

2.1.2 The majority of children attending Rodmell CE Primary School do not live within the local area to the school. Only 19% of pupils attending the school at the January 2016 census came from the community area. The significant majority of children living in the community area choose to attend other local schools. No child allocated a reception year place for September 2016 lives in the school's community area.

2.1.3 Even if Rodmell CE Primary School were to fill to capacity it would remain a very small school (63 places). There are insufficient pupils in the community area now, and predicted for the future, to sustain an educationally and financially viable primary school in the long term without relying on attracting pupils from areas closer to other schools.

2.1.4 The latest set of pupil forecasts for the area, which take account of proposed housing developments indicate that there would be sufficient primary reception year places in the period to 2022/23 were Rodmell CE Primary School to close. If at any point in the future temporary shortfalls were to appear in the Newhaven area as a result of housing developments in Newhaven, there is capacity at other schools in the town to provide one off bulge classes if required. **Appendix B** sets out CSD's forecasting methodology and predictions for the area.

2.1.5 There will be sufficient places available in other schools in the area in 2017/18 for children from Rodmell CE Primary School if it were to close. There might be a very small shortfall of places in Newhaven in Years 1, 5 and 6 depending on which schools parents express a preference for. This would be addressed through working with the other schools in the area.

2.1.6 Asking schools to exceed PAN is a strategy adopted in other parts of the county where there is pressure on places but the level of demand does not justify the creation of bulge classes. Forecasts indicate that this strategy would only need to be in place for a very short period of time until the larger cohorts leave the primary phase. It should be noted that there is no class size legislation in Key Stage 2 which limits class sizes to 30 pupils.

2.2 Leadership

The substantive headteacher resigned her position with effect from end of August 2016. Recruitment to Headteacher roles in small schools is challenging, both locally and nationally. Recruitment activity across the county indicates that it will be very difficult, if not impossible, for Rodmell CE Primary to recruit to a headteacher vacancy. Attempts to recruit on an interim basis have not yet proved successful.

2.3 Budget

2.3.1 The Council has been working with Rodmell CE Primary School on its three year budget plan; the school has recognised that the initial budget plan they submitted as a balanced budget did not balance across the three years. The school has recognised that in order to create a balanced budget for this financial year it will require reorganisation of key resources, including reducing to two teaching classes from September 2017. The Council and the school had explored this option prior to the consultation on closure. The Council and governors recognise that taking these steps will have a significant impact on the school. The school will be left with a very challenging budget with no flexibility or contingency built in. In addition, in order to secure a balanced budget this year, the Council will be required to provide additional resources. The Council has agreed with the school arrangements for the school to monitor the budget regularly.

2.3.2 The Council is concerned about the impact and the quality of the education and development of children at the school when it reduces to two classes: with 4-7 year olds in one class and 8-11 year olds in the second class. The school currently operates with three classes: maintaining standards will be much more difficult with one class per Key Stage and will present significant challenges in meeting national curriculum requirements.

2.4 Performance

2.4.1 The Council provided significant support to Rodmell CE Primary School to enable its move from 'Requires Improvement' to 'Good'. However, attainment in Early Years Foundation Stage and Key Stage 1 show variation year on year with many results below national average. Attainment at Key Stage 2 has been below national average L4+ for Reading/Writing/Mathematics for the last three years. The recently received provisional outcomes data for Key Stage 2 for this year shows that no children (0%) achieved the expected standard in reading, writing, maths combined against an East Sussex average of 51.5%.

2.4.2 It is recognised that trends are difficult to establish as cohort numbers are very small. However, we have a responsibility to ensure that all children make expected levels of progress by the time they leave Year 6.

2.4.3 It is considered that in such a small school it would be extremely challenging to provide a wide and diverse curriculum and would limit the range of opportunities available for all pupils both for their academic and social development.

2.5 Petition

2.5.1 During the consultation period a 5,000+ signature petition in relation to the proposed closures of both Rodmell CE Primary School and Pells CE Primary was submitted to the Local Authority. The petition is available for members to view.

2.5.2 The petition was presented at Full Council on 10 May 2016 where the following motion was moved.

In view of the increasing need for Primary School places in and around Lewes in the next five years, the strength of public feeling shown by a petition of over 5,000 signatories and the emerging plans for the future at both Rodmell School and Pells School, the Council recommends to Cabinet that the process towards the closure of these two schools is halted at the end of the consultation to enable these plans to be put into place.

2.5.3 A recorded vote on the motion was requested and taken. The motion was carried, the votes being cast as follows - 28 for the motion and 20 against the motion. In accordance with the Lead Member decision and the resolution of the Council we have sought to look at possible alternative options and to engage with stakeholders to consider any emerging plans that are put forward.

2.6 Alternative Options

2.6.1 The Council has been actively promoting federation with schools since November 2014 and has, along with the Diocese, spent a considerable amount of time exploring options for Rodmell CE Primary School. No Academy has expressed an interest in taking the school into their Trust; the low admission number; very limited number of births in the local area; significant long term financial challenges and small site means that it does not present as a viable proposition and is therefore is not attractive to an Academy Trust.

2.6.2 The Council has a role in supporting schools to explore federation but it is not responsible for securing those partnerships. Federation is a decision made by the governing bodies of schools and the Local Authority can only direct governing bodies to federate in exceptional circumstances.

2.6.3 A proposal has been submitted by the 'Save our Schools' campaign group which has been set up by parents. This proposal has been evaluated by officers who have concluded that the proposal is not viable, it does not address the challenges that the school faces and will not lead to the future sustainability of the school. The proposal and evaluation are provided in **Appendix C**.

2.6.4 The Council has looked at alternative plans. It has taken forward discussions with Iford and Kingston CE Primary School about the interim leadership support that the school could provide to Rodmell CE Primary School during the 2016/17 academic year. Representatives of the governing body of Rodmell CE Primary School engaged in subsequent discussions to further explore this. However, the governing body of Iford and Kingston CE Primary School

has since confirmed that it feels unable to support Rodmell CE Primary School for 2016/17 due to their forthcoming building works and their upcoming Ofsted inspection. The governing body feel that the focus of management at the school needed to be firmly on their own school over the next twelve months. The governing body has however indicated a willingness to consider the possibility of partnership between the schools in the future if it is agreed that the school will not close. The governing body have indicated that they feel a sense of moral purpose to support Rodmell CE Primary School given the close geographical proximity of the two schools but have concerns about their capacity to do so.

2.6.5 Across the county there are models of successful partnerships between schools, including small rural schools, and whilst this partnership by no means presents a straight forward or guaranteed solution to addressing the challenges faced by Rodmell CE Primary School it nonetheless may present an opportunity, worthy of further exploration, for securing a more sustainable future for the school. It could be considered premature to close down this opportunity to explore this partnership.

2.6.6 It should be recognised that allowing time to explore this option could have a negative impact on the school as it will extend the period of uncertainty for parents and staff. In this event, to mitigate this the Council and governing body should commit to maintain regular communication. It should also be noted that there is no firm commitment from Iford and Kingston CE Primary School to agree to partnership just a willingness to further explore this option. The Council will investigate and evaluate fully any proposals brought forward by the governing body.

2.7 Equality Impact Assessment

2.7.1 Members are required to have 'due regard' to the duties set out in Section 149 of the Equality Act 2010 ('the PSED') in determining the proposal to halt the proposed closure of Rodmell. The Equality Impact Assessment (EqIA) has been prepared in order to analyse the equality implications of this proposal and to identify any appropriate mitigations. The EqIA is appended to the Consultation Report. Members must read the EqIA and take their findings into consideration when determining the proposal. The EqIA is attached at **Appendix D**.

2.8 Scrutiny Committee

2.8.1 At the recommendation of CMT, Scrutiny Committee considered the report on Rodmell CE Primary School at an additional meeting on Monday 4 July 2016. A summary of the Committee's discussion and responses to the proposal is included in **Appendix E**.

3. **Conclusion and reasons for recommendations**

3.1 The number of responses from the consultation demonstrates that the majority of parents, pupils, staff, the governing body and the local community are against the proposed closure of the school.

3.2 At Full Council it was resolved that the process for closure be halted while emerging plans are put in place. The Council remains very concerned about the long term sustainability of the school in terms of its financial stability, its ability to secure consistently good outcomes for pupils, its ability to appoint high quality long term leadership that can move the school forward and its ability to attract pupils from within its community area. However it is minded to allow time for the school to explore a sustainable partnership model which should include further discussion with Iford and Kingston CE Primary School.

3.3 For the reasons set out in this report Cabinet is recommended to:

Halt the proposed closure of Rodmell CE Primary School and allow the governing body of Rodmell CE Primary School further time to submit a firm and viable proposal that would ensure a sustainable future model for the school for review by the Council during Term 5.

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LOCAL MEMBERS

Councillor Carla Butler

APPENDICES

Appendix A	Consultation Report
Appendix B	Pupil Forecasting and School Places
Appendix C	Proposal and Evaluation
Appendix D	Equality Impact Assessment
Appendix E	Summary of Scrutiny Committee

BACKGROUND DOCUMENTS

Lead Member Report and Minute of 21 March 2016

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CONSULTATION REPORT

on the

Proposal to close Rodmell CE Primary School

June 2016

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1. Introduction

- 1.1 On the 21 March 2016 the Lead Member for Education and Inclusion, Special Educational Needs and Disability gave approval for the Council to formally consult with key stakeholders on a proposal to close Rodmell CE Primary School.
- 1.2 The proposed changes to the organisation of schools have to follow a prescribed process established by the Education and Inspections Act 2006 (EIA 2006) as updated by the Education Act 2011 and the School Organisation (Establishment and Discontinuance of Schools) (England) Regulations 2013.
- 1.3 This process complied with these requirements.

2. The Consultation

- 2.1 A six week public consultation on the proposed closure of Rodmell CE Primary School commenced on 15 April and ran until 27 May 2016. Hard copies of the Council's consultation document were distributed to approximately 1,420 key stakeholders and interested parties. Table 1 below provides a list of consultees. The consultation document was also made available on the Council's website.

Table 1

Organisation	Number of copies
Rodmell CE Primary School	111
Iford and Kingston CE Primary School	15
St Pancras Catholic Primary School	15
South Malling CE Primary School	15
Southover CE Primary School	15
Wallands Community Primary School	15
Western Road Community Primary School	15
Hamsey Community Primary School	15
Pells CE Primary School	15
Cradle Hill Community Primary Schools	15
Chyngton Primary School	15
Seaford Primary School	15
Annecy Catholic Primary School	15
Denton Community Primary School	15
Harbour Community Primary School	15
Meeching Valley Community Primary School	15
Newhaven Academy	15
Meridian Community Primary School	15
Peacehaven Heights Primary School	15
Telscombe Cliffs Community Primary School	15
Priory School	15
Seahaven Academy	15
Peacehaven Community College	15
Seaford Head	15
Lewes College	1
Maria Caulfield MP	1
Lewes District Council	45
Rodmell Parish Council	10
Diocese of Chichester	1
Diocese of Arundel and Brighton Catholic Schools Service	1
Old School Surgery	20
Seaford Medical Practice	20
Mid Downs Medical Practice	20
St Andrew's Surgery	20
School Hill Medical Practice	20
Anchor Field Surgery	20

Organisation	Number of copies
Riverlodge Surgery	20
Chapel Street Surgery (Newhaven)	20
Quay Side Medical Practice (Newhaven)	20
Anchor Health Care Centre	20
Rowe Avenue Surgery (Peacehaven)	20
Sussex Voluntary and Community Learning Consortium	10
Lewes Library	20
Seaford Library	20
Newhaven Library	20
Peacehaven Library	20
Lewes Children's Centre	20
Newhaven Children's Centre	20
Peacehaven Children's Centre	20
Seaford Children's Centre	20
The Co Operative Childcare Brighton	20
Denton Island Nursery	20
Denton School Nursery	20
Happy Valley Pre-School	20
Early Birds Pre-School	20
Noah's Ark Nursery School And Daycare	20
Pebbles Day Care	20
Railway Nursery Ltd	20
Butterfly Nursery	20
Butterfly Nursery Ltd	20
Happy Days Nursery	20
Hopscotch Nursery (Peacehaven)	20
Rainbow Childcare - Peacehaven	20
Telscombe Cliffs Nursery School	20
Wild Monkeys Childcare	20
The Blue Door Nursery	20
Charlie Bear's Nursery	20
Chyngton Methodist Church Playgroup	20
Early Birds Pre-School	20
Goodtimes Pre School	20
Hopscotch Nursery (Seaford)	20
Little Poppets	20
Micklefield School (nursery)	20
ESCC Councillors	48
Trade Unions	7
TOTAL	1420

2.2 The consultation document included a response form to assist and encourage people to give their views. Interested parties could provide a response to the consultation by returning the response form attached to the consultation document, by completing it online, by letter or by email.

2.3 An Equality Impact Assessment (EqIA) has been prepared for the proposal.

3. Consultation Events

3.1 A meeting was held with school staff and their union representatives on 22 April 2016 to provide the opportunity for officers to provide more detail about the proposal and for those attending to ask questions and raise concerns. A Question and Answer (Q&A) document was produced after the meeting and emailed to the headteacher to circulate to all staff.

3.2 A public meeting was held in the Church of St Peter, Rodmell on the 3 May 2016 to provide more detail about the proposal and enable parents, carers and all interested

parties to ask questions and raise concerns. Notes were taken at this meeting and a Q&A document responding to the key issues raised was produced and posted on the Council's website for people to view. This can be viewed in section 5 of this report.

- 3.3 The children of Rodmell CE Primary School were encouraged to express their views. An officer from the Council met with representatives of the school council on 24 May 2016. 27 letters were also received from pupils. The overall view expressed by the children was that their school was special to them because it was a small school and they hoped that it would not close despite the proposals. The pupils particularly highlighted the facilities available at the school, the friends they have made, the school trips, the help they receive from school staff, the fundraising activities they participate in and the schools affiliation to the church. The feedback received from pupils can be viewed in Section 6 of this report.

4. Consultation Responses

- 4.1 All written responses received during the consultation will be provided to Cabinet for consideration ahead of the meeting on 19 July. A summary of responses, grouped by key theme is provided at Section 7:

In total:

- 118 consultation responses were received during the consultation period of which 85 were completed on line and 33 forms were returned via freepost. It should be noted that a number of duplicate responses were made.
- 1 letter was received
- 2 emails were received
- The governing body of Rodmell CE Primary School submitted an 'Audit Framework and Proposal' to the Director of Children's Services
- 10 respondents emailed members of Cabinet directly

- 4.2 Where known the following stakeholders responded to the consultation

- 27 parents/carers of a child at Rodmell CE Primary School
- 5 pupils at Rodmell CE Primary School
- 9 members of staff at Rodmell CE Primary School
- 4 members of the governing body at Rodmell CE Primary School
- 40 members of the local community
- 31 other (a local teacher, East Sussex resident, Local MP, local nursery owner, former pupils, friends and relatives of parents with children at the school and of staff at the school, parents of children at local schools, teachers at local schools, past pupils, teacher/union rep, visiting professional, Rodmell Parochial Church Council)
- 2 not answered

5. PUBLIC CONSULTATION MEETING, 3 MAY 2016

QUESTION AND ANSWER DOCUMENT produced following the meeting

Q: The consultation document is not a fair representation of the school. The Local Authority did not ask the school to read it before it was published. The information about the balanced budget is incorrect and while attainment is below the national average it does not highlight the small cohort of children, pupils ability and progress children make. The school has also been judged by Ofsted to be a good school.

A: The information provided in the consultation document about the budget position of the school reflects the financial information provided by the school to the Local Authority at that time which showed that it had a deficit budget of £12,000. The information subsequently provided by the school however, showed a surplus. Officers from the Local Authority are working with the school to understand how the school has gone from having a deficit budget to a surplus and the 3 year forecast presented. This information will be taken into account by the Lead Member along with all other consultation responses.

The Local Authority does not save any money by closing the school – Local Authority funds are separate to school funding. But school funds are public money and the Local Authority has a responsibility to ensure efficient use of school funding; inefficient use impacts on all schools and children in the county.

The national funding formula (NFF) will also bring more challenges financially. The implications of the NFF cannot be reasonably estimated at this time, but the facts are that there is overall no additional funding and some schools may face budgetary reductions as a result. Schools will also need to consider resourcing rising costs including: the National Living Wage; pay awards; increased National Insurance contributions; the apprenticeship levy; supporting SEN provision.

The most important consideration is that the children at the school receive the standard and breath of education they are entitled to. No-one is questioning the hard work and dedication of the staff at the school. However, there are variations in attainment at the school at all key stages. Attainment at key stage 2 has been consistently below the national average for the last 3 years.

Q: You state that the school's budget share is high. Other small schools have a higher budget share than Rodmell including Five Ashes CE Primary School which was part of the Heathfield Area Review. Why are they not being considered for closure?

A: The budget share at Rodmell is high (£6,241.15) and significantly above that of other local schools. The average budget share per pupil for East Sussex primary schools is £3,787.33. This excludes carry forwards or deficits and any additional funds received, for example pupil premium.

One of the key differences with the Heathfield Area Review was that as the Area Review was being undertaken Wealden District Council's emerging Local Plan put forward plans for significant new housing across the Heathfield area in the period to 2037. Taking this into consideration it was felt that the closure of any schools in the area could not be taken forward because of the risk of future pressure on places that could arise as a result of the new housing.

Q: Can you tell me what the extra funding (£20,000) provided by the Local Authority was for?

A: To support the school budget

Q: Why did the Local Authority outsource the Area Review?

A: The Local Authority has had a significant amount of pressure in terms of its budgets which has led to a reduction in staffing numbers. It was felt that as this was a complex piece of work we wanted to ensure that we had sufficient capacity to dedicate to it and that there was real value in having an external consultant do this work in terms of the knowledge and expertise they would bring to the work.

Q: The Local Authority has said that governors are responsible for the school budget, I understand the Local Authority removed delegated powers from the governing body some time ago. This makes this consultation a very doubtful process

A: The Local Authority indicated to the governing body its intention to remove the delegated budget at the point when it was trying to understand from the school how they arrived at their original predictions indicating that they were in a deficit position. However, this has not happened as the school subsequently presented a budget indicating a surplus of £6,000. It would be remiss of the Local Authority not to allow time to look at the budget plan now presented by the school and we would expect to have a better understanding of how the school arrived at its figures by the time the consultation has ended.

Q: Can you explain what the Local Authority has done to help the school federate and during the time when schools were being asked if they would federate with Rodmell were the schools given the same information that the school could potentially be closed? Can you provide documentation supporting your claims? Can the Local Authority not act to force schools to federate?

A: The Local Authority has been actively promoting federation with all small schools in the County since 2014 and has, along with the Diocese, spent a considerable amount of time working at exploring options with Rodmell.

As part of the Area Review process, and in a number of meetings from June 2015 onwards federation has been discussed as a possible option for the school. The Local Authority has approached other local schools and academy chains to try and identify a federation or academy solution for the school. Discussions were held with the Lewes Co-operative Trust who considered whether federation or amalgamation could be a possibility, no schools expressed a willingness to federate or amalgamate with the school. The headteachers and governors of those schools were aware of the implications.

Federation is not considered a viable option for the school going forward as it was felt that federation would not provide future sustainability for the challenges the school is facing. Although the Local Authority has a role in supporting schools to explore federation it is not responsible for securing a partner school. Federation is a decision made by the governing bodies of schools and the Local Authority can only direct governing bodies to federate in exceptional circumstances.

Q: Why are the Diocese not looking at including Rodmell as part of the Multi-academy trust (MAT)?

A: The Diocese have had discussions with the Regional Schools Commissioner (RSC) who gives permission for a school to become part of a MAT. The RSC has been very clear that unless groups of small schools that amount to two form entry between them come together it is not likely to be a financially viable option. Schools cannot convert with a deficit budget. Schools that are part of a MAT have to be financially viable, year by year and when sponsors do due diligence they look three years ahead.

Q: It seems that it just comes down to economics. Is it a movement by the government that small schools do not fit into their plans?

A: Nationally the government views a small school as anything less than two forms of entry. Consideration would not be given in the current climate to creating a new school of the size of Rodmell. However, we have a lot of small schools in East Sussex and where viability is an issue it is looking to bring schools together in partnerships. The area review in Lewes identified two schools that the Local Authority were looking at regarding closure. Options for bringing those schools together with other schools had been investigated without success.

Q: Is this really a consultation process or has a decision already been made to close the school? Your presentation has given the impression that this is a forgone conclusion. We would like your reassurance that this isn't the case, that during the consultation period you will actively look to seek federation solutions and finding a business case.

A: The decision has not been made at this stage and we are in the consultation stage. Our presentations have set out the reasons why we have recommended the consultation on closure. The Lead Member will take account of all responses received during the consultation period and consider all information before a final decision is made. The consultation is about listening to all views and opinions to allow an informed final decision to be made. Our investigations concluded that there were no partnership options that would create a sustainable model for the school going forward. As a Local Authority at this stage we are not looking at alternatives as we feel we have exhausted all avenues with other schools.

Q: In terms of the consultation document it looks like you are only consulting on closure particularly when the Lead Member said you should be looking at other options. Teaching staff were not made aware of the Lead Member recommendation that he would consider alternatives put forward. This was not fed back to the school and we only became aware of it through parents.

A: The Lead Member did not ask the Local Authority to look at options but put the offer out to the schools involved to come up with alternatives. Parents and governors can examine partnership opportunities for the school as alternatives to closure but the Lead Member was clear that a robust and long term viable business case would have to be submitted. If you believe there are alternative options please put forward your proposals including detailed information about the educational and business benefits including its long term sustainability. The Lead Member was clear that all credible options will be considered, alongside all other responses from the consultation before a final decision is taken.

Q: Much is made of the fact that we are not local parents. What other local schools will our children be able to attend as the schools are saying they have no places and are oversubscribed and will schools have to go over their PAN to accommodate all those extra pupils?

A: Most of the pupils that attend Rodmell come from outside the community area – and outside the Lewes community area. We would expect many pupils to apply to schools closer to their home address.

Q: You did say that you had to take into consideration the children. By putting our children into a class with 30 pupils and above they would be getting lost in that system. Some children need a small classroom and cannot cope with being put into large classrooms. A school in Newhaven has 37 pupils in a class; that is not providing great opportunities for the children. You cannot get to speak to the teachers. Some of us have taken our children out of these schools.

A: We believe in general there will be sufficient places available in Newhaven, Peacehaven and Seaford in 2017/18. There are a few year groups in Key Stage 2 where

there may be a small shortfall in places. Class size legislation prohibits classes of more than 30 in Key Stage 1 unless supported by an additional teacher. Class size legislation does not exist in Key Stage 2 and schools are therefore able to exceed 30 in a class if required. We will work with schools in those areas to ensure all children have a place for September 2017

Q: Parents choose Rodmell because it is a small school and because they want to get a Church of England education. Parents had the option of choosing bigger schools and you are discriminating against those that want their children to attend a faith school. Why are the children who live outside the community not attending the schools nearer to their homes? It is parents personal choice and the right to choose will be taken away by closing the school.

A: Parents have a right to express a preference for a school, not to choose which school their children attend. There are church schools (both VC and VA) in the wider area including in Lewes and Seaford that parents will be able to express a preference for.

Q: We have a high number of SEN children. The progress our cohort of children make is good. Their journey here is unique. It is not just about attainment but about the journey they make.

A: Rodmell CE Primary School is a mainstream school. All mainstream schools are required to meet the individual needs of all their pupils including those with SEN. All schools in the area want all children to thrive and have access to a range of support to help with their needs. This would be the case for children moving from Rodmell and all schools would be expected to provide the same level of care as that provided at Rodmell.

Q: You are saying that the White paper has changed since it came out. We know that the current proposal states that there will be a sparsity factor

A: The sparsity factor is deployed by East Sussex in determining support for local schools. Eligibility for sparsity funding is currently based on guidelines set by the DfE relating to two factors.

1. Proportion of children in the area who have to travel more than two miles to their second nearest school. It is not to do with the distance between the two schools, it is related to the mean distance. The mean distance is then calculated for these pupils and this becomes the school's sparsity distance.
2. The average year group is less than 21.4 for the primary phase and 120 for the secondary phase.

The sparsity factor would not apply to Rodmell as, although they would qualify under the average year group size, their sparsity distance is only 1.74 miles.

Q: The statement in the presentation about attendance at Rodmell CE Primary School is incorrect.

A: According to RAISEonline validated 2015 data attendance at the school is as follows:

- Attendance was low, in the lowest 10% of mainstream schools nationally
- Attendance was low, in the lowest 10% of mainstream schools nationally for the following groups: FSM, non-FSM, boys, girls, SEN with EHC/statement, no SEN

Q: The consultation document states that Rodmell Primary School often struggles to attract children and in January 2016 had only 48 on roll when it's PAN is 63. This is due to the devastating impact of a previous Ofsted Requires Improvement judgement and the loss of the school bus. For the last five years the school has had a full intake in Reception and this year's intake was going to be full and Local Authority predictions are that we are going to be full.

A: The school has struggled to meet its pupil admission number, particularly from its community area, at the January 2016 census the school had 48 pupils against a capacity of 63 which represents a 24% surplus of places. Only 9 of the children (19%) attending the school live in the school's community area. Over the last 10 years annual birth rates in Rodmell and Southease parishes have averaged at 3 per year. Not all these children attend the school. 14 pupils attend another local primary school. The predicted annual birth rate in the future is expected to be similar. First preferences have been low over the last few years. Even if all places were filled with any preferences the school remains a very small school.

Q: I know from parents in the Newhaven area that the classes and the schools in Newhaven do require a lot more improvement.

A: The Local Authority worked closely with Rodmell when it was a Requires Improvement school to enable it to become a good school. We similarly work with all other schools to ensure they secure judgements as Good or Outstanding schools. Like Rodmell, Denton has also moved from Requires Improvement to Good. Harbour Primary School were inspected recently and we await the outcome.

Q: How many times was Denton and Meeching Valley in Special Measures?

A: Denton has not been in Special measures. Meeching Valley was judged to be in Special Measures in 2012. In March 2014 the school was judged as 'Requires Improvement'

Harbour Primary School

May 2016	2 - Good
February 2014	3 – Requires Improvement

Denton Primary School

April 2015	2 - Good
April 2013	3 - Requires Improvement
June 2011	3 - Satisfactory
January 2008	3 - Satisfactory

Meeching Valley Primary School

March 2014	3 - Requires Improvement
March 2012	4 - Special Measures
December 2008	3 - Requires Improvement

Rodmell CE Primary School

November 2014	2 - Good
November 2013	3 - Requires Improvement
March 2009	2 - Good

Q: Has the Diocese given any thought to what might happen to the school building? If it is under threat as a school would the church also be under threat as it would lose some of its community when children and family are not attending services. I believe the school site was donated to the village?

The Lewes Area Review report Appendix 1 of the Lead Member report on 21 March states in Recommendation 2, page 27, last bullet point, *'Discussions are ongoing with the Diocese of Chichester to use any capital receipts from the school sites/buildings*

to improve facilities at other church schools in the town' I take it you have taken a valuation of the site?

A: While the Diocese has to be mindful of the cumulative effect of these decisions, decisions about churches and schools are made by two different departments within the Diocese. As we are under Charity Commission legislation, if we were to sell the school, the Diocese would have to gain best value. The Diocese has not considered what would happen to the land at this stage and would not do so until a final decision has been made about closure, in order to remain impartial during the consultation.

The discussion with the Local Authority referred to was an in principle discussion about both area reviews in terms of the Local Authority's desire to secure from the Diocese agreement to making a financial contribution through reinvestment in the education of the children displaced from the school.

Q: It has made a tremendous difference to the church community to have a school in the area. The benefit has been mutual for the church community and the school. It is disappointing that the diocese does not hold that precious. I don't think the Diocese understands how mercenary that sounds. It is so sad that the heart is being ripped out of these communities.

A: The Diocese is fully aware of what happens in a community when it loses its school, church or both but unfortunately because of the circumstances has to consider the long term financial viability of the school, given that the Diocese does not have the financial resources to subsidise small schools

6. Meeting with Pupil Representatives on Tuesday 24 May 2016

Consultation on Proposal to close Rodmell CE Primary School

Responses of Rodmell's Children

What do you like about your school?

- Get to learn to swim at Newhaven Pool
- Maths, Science, times tables, Literacy, RE, Golden Time, Assembly, Art, pasta treats
- The teachers, they are funny
- Our friends that we have for company
- Get lots of support as it's a small school. In class if the teacher asks a question, and children put their hands up, teachers can listen to everyone's answer unlike in a big school
- Get more opportunities as it is a small school; we get to know everyone's name and are friends with everybody in other year groups
- Don't have split playtimes; like being able to play with everybody in other year groups
- Rodmell is a great school, get to have friends in every class, it is like one big family
- I like the school and don't want it to close down
- It is a nice place to be, I like doing writing

What do you think about the school maybe closing?

- Really feel upset because I have lots of friends and sad if I got split apart from my best friend
- We would all get split up, my best friends would go to different schools, we would not be able to see each other
- Won't be able to have so much fun at another school
- When you go on a school trip, teachers can help you more and find you if you got lost
- Although I am leaving soon because I am in Year 6 I don't want the school to close.
- Although tomorrow is my birthday I would rather do the protest because I love this school
- If you go to a school in a city or a town there is not so much peace and quiet. In the mornings when you come to school you would not be able to hear the birds singing over the noise of lots of cars
- I would miss the view of the South Downs and miss Monks House where we have an allotment and grow our own vegetables
- All the things outside, got lots of friends and in other places there are not as many spaces there
- Feel a bit scared and sad that I could be in a bigger school and scared as I would not know who the people are there and what is going on.
- I like the PE [equipment] at Rodmell in the hall and would be worried other schools would not have the same things
- We have time to play and run around before we go into school in the morning and would be worried that you would not be able to do this at another school

What would you miss about your school if it had to close next Summer?

- Our friends
- The South Downs
- I would cry because I would miss our school
- Teachers, they might not be as funny as they are here
- The lessons, they won't be the same at other schools as if there are more children you won't get the same support as at a small school
- In a bigger school you would have to move to a different class, here you get to stay in your own class and have your own trays.
- Worried about where you would be sitting as here some like to sit at the front and

- some at the back and I like being able to choose where I can sit
- Won't be able to get the chance to go to another school like this again
- Where we get to play because of all the nature and places where there are fun things to make from, for example the ivy
- Worried that you might not make a friend at another school as great as the friend made at Rodmell especially because I have known them for a long time.
- I don't see my friends very much outside school as I am so busy
- You could see your friends for tea
- I like the chance to do drawings at Monks House and the visitor we had from Brighton Museum
- Worried might have to go to a boarding school
- I have been to a school that has already closed down so worried about making friends again
- Not being able to do the fundraising like we do here such as the time we made ice-lollies and Valentine's day chocolates. We do fundraising for the PATINA moving on Parade and our link school in Gambia.
- If you don't use all your packed lunch you can recycle and give to the poor.

How would you feel about going to another school?

- I wouldn't like it. You would have to make all your friends again
- Some people might not be nice to you and you might get bullied
- Here everything is perfect and no-one is mean
- I was happy when I came here because another boy was friendly straight away
- My friend is already leaving the school and I feel sad because it has happened before

Is there anything else you want to ask or tell us about?

- Is the school going to close?
- Why do they want to close the school?
- When you close the school, why don't you think about what the children feel and the adults and why don't you come in and see how the children are doing?
- What school do we go to if they close the school?
- What if we don't like the other schools?
- What if we don't want to be home schooled because you don't make any friends?
- Why can't Rodmell join with Pells?
- Another school won't be as much fun
- Rodmell is one of a kind, it is the best!

7. KEY ISSUES RAISED BY RESPONDENTS

School Places

Consultee Comment	County Council Response
<ul style="list-style-type: none"> Reception intakes to the school have been full for the last few years Pupil forecasts suggest the school will be full by the end of the decade Have the numbers at the school fallen because of the uncertainty about its future? Parents have chosen to travel to Rodmell because it is a good school with a Christian character. There are no other schools with a Christian ethos in the local area. 	<p>The average annual birth rate in the Rodmell and Southease Parish in the period 2001/02 (reception year intake 2006/07) to 2010/11 (reception year intake 2015/16) was only 3.4. In the period 2011/12 (reception year intake 2016/17) to 2014/15 (reception year intake 2019/20) the average annual birth rate was even lower at 2.5.</p> <p>The majority of children attending Rodmell CE Primary School do not live within the local area to the school. Only 19% of pupils attending the school at the January 2016 census came from the community area. The significant majority of children living in the community area choose to attend other local schools. No child allocated a reception year place for September 2016 lives in the school's community area.</p> <p>Even if Rodmell CE Primary School were to fill to capacity it would remain a very small school (63 places). There are insufficient pupils in the community area now, and predicted for the future, to sustain an educationally and financially viable primary school in the long term without relying on attracting pupils from areas closer to other schools.</p> <p>The latest set of pupil forecasts for the area, which take account of proposed housing developments indicate that there would be sufficient primary reception year places in the period to 2022/23 were Rodmell CE Primary School to close. If at any point in the future temporary shortfalls were to appear in the Newhaven area as a result of housing developments in Newhaven, there is capacity at other schools in the town to provide one off bulge classes if required. Appendix B sets out CSD's forecasting methodology and predictions for the area.</p> <p>There will be sufficient places available in other schools in the area in 2017/18 for children from Rodmell CE Primary School if it were to close. There might be a very small shortfall of places in Newhaven in Years 1, 5 and 6 depending on which schools parents express a preference for. This would be addressed through working with the other schools in the area.</p> <p>Asking schools to exceed PAN is a strategy adopted in other parts of the county where there is pressure on places but the level of demand does not justify the creation of bulge classes. Forecasts indicate that this strategy would only need to be in place for a very short period of time until the larger cohorts leave the primary phase. It should be noted that there is no class size legislation in Key Stage 2 which limits class sizes to 30 pupils.</p> <p>The Council acknowledges that statutory consultation around school organisation will cause a level of uncertainty which can be a contributory factor on pupil numbers at the school. However, the pupil numbers at the school have been low for a significant number of years.</p> <p>Listed below are the schools in the local area with a Christian character in the local and surrounding area.</p> <p>Iford & Kingston CE Primary School Southover CE Primary School, Lewes South Malling CE Primary School, Lewes St Pancras Catholic Primary School, Lewes Annecy Catholic Primary School, Seaford</p>

Ofsted Judgement

Consultee Comment	County Council Response
<ul style="list-style-type: none"> The school was graded 'good' by Ofsted in November 2015. Why does the Local Authority want to close a good school? Only one school in Newhaven is rated 	<p>The Council provided significant support to Rodmell CE Primary School to enable its move from 'Requires Improvement' to 'Good'. However, attainment in Early Years Foundation Stage and Key Stage 1 show variation year on year with many results below national average. Attainment at Key Stage 2 has been below national average L4+ for Reading/Writing/Mathematics for the last three years. The recently received provisional outcomes data for Key Stage 2 for this year shows that no children (0%) achieved the expected standard in reading, writing,</p>

<p>'Good' by Ofsted. All other schools in Newhaven are rated as 'requires improvement'</p> <ul style="list-style-type: none"> All other schools in Newhaven are currently rated by OfSTED as requires improvement and at least 1 school has 37 pupils in some classes 	<p>maths combined against an East Sussex average of 51.5%.</p> <p>It is recognised that trends are difficult to establish as cohort numbers are very small. However, we have a responsibility to ensure that all children make expected levels of progress by the time they leave Year 6.</p> <p>It is considered that in such a small school it would be extremely challenging to provide a wide and diverse curriculum and would limit the range of opportunities available for all pupils both for their academic and social development.</p> <p>One local school, Iford & Kingston CE Primary School, was rated 'Outstanding' by Ofsted when it was last inspected. Two schools in Newhaven are rated 'Good' by Ofsted. There are also five schools in Lewes, three schools in Seaford and two schools in Peacehaven who are currently rated 'Good'.</p> <p>The Council works closely with all schools to ensure they secure judgements of 'Good' or above as it did with Rodmell CE Primary School when it was judged to 'Requires Improvement.'</p>
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School's Budget

Consultee Comment	County Council Response
<ul style="list-style-type: none"> The school's budget was in surplus at the end of the 2015/16 financial year and a three year balanced budget is forecast. Other small schools have a high budget share and they are not being proposed for closure. The savings will simply be redistributed into other areas of the Council budget for things like road repairs. 	<p>The Council has been working with Rodmell CE Primary School on its three year budget plan; the school has recognised that the initial budget plan they submitted as a balanced budget did not balance across the three years. The school has recognised that in order to create a balanced budget for this financial year it will require reorganisation of key resources, including reducing to two teaching classes from September 2017. The Council and the school had explored this option prior to the consultation on closure. The Council and governors recognise that taking these steps will have a significant impact on the school. The school will be left with a very challenging budget with no flexibility or contingency built in. In addition, in order to secure a balanced budget this year, the Council will be required to provide additional resources. The Council has agreed with the school arrangements for the school to monitor the budget regularly.</p> <p>The Council is concerned about the impact and the quality of the education and development of children at the school when it reduces to two classes: with 4-7 year olds in one class and 8-11 year olds in the second class. The school currently operates with three classes: maintaining standards will be much more difficult with one class per Key Stage and will present significant challenges in meeting national curriculum requirements.</p> <p>The Council does not save any money by closing the school – Council funds are separate to school funding and should the school close funds are distributed across all schools. School funds are public money and the Council has a responsibility to ensure efficient use of school funding; inefficient use impacts on all schools and children in the county. The government is also making changes to the national funding formula which will mean schools will face additional challenges in the future.</p>

Headteacher Recruitment

Consultee Comment	County Council Response
<ul style="list-style-type: none"> The LA states the school will struggle to recruit a headteacher. Have they tried? The resignation of the headteacher has nothing to do with this. She resigned well before the Area Review result was made public. A number of schools are without a headteacher. There 	<p>The substantive headteacher resigned her position with effect from end of August 2016. Recruitment to Headteacher roles in small schools is challenging, both locally and nationally. Recruitment activity across the county indicates that it will be very difficult, if not impossible, for Rodmell CE Primary to recruit to a headteacher vacancy. Attempts to recruit on an interim basis have not yet proved successful.</p> <p>Our normal procedure when going through any process that could lead to a significant change in the leadership and management of a school for example partnership, federation or closure would be to recommend that the governing body should not to attempt to recruit to a permanent headteacher role until a final decision is taken on the proposal</p>

is no mention of them closing.	
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Strengths of Rodmell CE Primary School

Consultee Comment	County Council Response
<ul style="list-style-type: none"> It is an amazing school where we raise money for charity. It is quite small so you get a lot of attention. Quality of teaching staff who are very supportive. 	<p>The Council recognises that reviewing the future of any school is controversial and emotive. The Council is challenged with balancing the sensitivities of community feeling on the one hand, with consistently providing a high quality education offer which can be sustained and afforded. Pupils, parents, carers and teachers, both current and past have strong ties to the schools they attend or have attended as part of their own life-stories.</p> <p>The Council has recognised the contribution of the staff and governors of Rodmell CE Primary School towards creating a good school. However, the Council cannot avoid making decisions for the future which are in the best interests of children and young people.</p>

Impact on pupils

Consultee Comment	County Council Response
<ul style="list-style-type: none"> Peer groups and siblings may be split up. Children will be heartbroken and afraid they will lose their friends. How will transition be managed especially for vulnerable learners? Parental preference is taken away. Get lots of support at the school as it is a small school. Would miss the South Downs, the birds and the peace and quiet We feel safe at our school. New teachers would not know us so well. The small environment of the school works well for the children. 	<p>The Council recognises that proposing changes to school organisation means there will be changes for pupils. Were closure approved, arrangements would be made for parents/carers to apply for a place at an alternative school in the local area. Parents/carers would be asked to complete an admissions application form and to name up to three schools they would like their child/ren to attend. Parents/carers would be offered a school place for their child/ren, either at one of their preferred schools named on the application form, or if this is not possible, at the nearest school to the child's home where a place is available. It should be noted that parents have a right to express a preference for a school, not to choose which school their child/ren attend.</p> <p>The Council will try to meet parents/carers' preferences wherever possible but cannot guarantee to do so. The allocation of places will be made in line with the admissions policy as set out in the school admissions booklet which is available on the East Sussex website https://new.eastsussex.gov.uk/educationandlearning/schools/admissions/</p> <p>Free transport would be provided to eligible children if appropriate. This is unlikely to be significant as we would expect the majority of pupils to attend schools closer to their home address.</p> <p>The Council and affected schools have a duty to support appropriate transition arrangements and the Council would take all practical steps to ease the transition for pupils, most especially for vulnerable learners and those with SEND.</p> <p>Should the proposal be implemented the Council would work with pupils, their parents and the relevant schools to make appropriate transition arrangements for pupils to familiarise themselves with their new environment.</p> <p>Were Rodmell CE primary School to close the Council is confident that teaching staff at other schools would manage the transition of any pupils to their new school. These circumstances are not unusual in that schools regularly manage in-year admissions.</p>

Alternative Suggestions

Consultee Comment	County Council Response
<ul style="list-style-type: none"> The LA has not done enough to investigate federation options for the school Being federated with another school would benefit each by sharing not only a headteacher but by 	<p>The Council has been actively promoting federation with schools since November 2014 and has, along with the Diocese, spent a considerable amount of time exploring options for Rodmell CE Primary School. No Academy has expressed an interest in taking the school into their Trust; the low admission number; very limited number of births in the local area; significant long term financial challenges and small site means that it does not present as a viable proposition and is therefore is not attractive to an Academy Trust.</p> <p>The Council has a role in supporting schools to explore federation but it is not</p>

<p>pooling resources and ideas resulting in a stimulating environment for children to produce of their best and to grow in confidence.</p> <ul style="list-style-type: none"> The Council should stop the process and look at our five year plan 	<p>responsible for securing those partnerships. Federation is a decision made by the governing bodies of schools and the Local Authority can only direct governing bodies to federate in exceptional circumstances.</p> <p>A proposal has been submitted by the 'Save our Schools' campaign group which has been set up by parents. This proposal has been evaluated by officers who have concluded that the proposal is not viable, it does not address the challenges that the school faces and will not lead to the future sustainability of the school. The proposal and evaluation are provided in Appendix C to the Cabinet report.</p> <p>The Council has looked at alternative plans. It has taken forward discussions with Iford and Kingston CE Primary School about the interim leadership support that the school could provide to Rodmell CE Primary School during the 2016/17 academic year. Representatives of the governing body of Rodmell CE Primary School engaged in subsequent discussions to further explore this. However, the governing body of Iford and Kingston CE Primary School has since confirmed that it feels unable to support Rodmell CE Primary School for 2016/17 due to their forthcoming building works and their upcoming Ofsted inspection. The governing body feel that the focus of management at the school needed to be firmly on their own school over the next twelve months. The governing body has however indicated a willingness to consider the possibility of partnership between the schools in the future if it is agreed that the school will not close. The governing body have indicated that they feel a sense of moral purpose to support Rodmell CE Primary School given the close geographical proximity of the two schools but have concerns about their capacity to do so.</p> <p>Across the county there are models of successful partnerships between schools, including small rural schools, and whilst this partnership by no means presents a straight forward or guaranteed solution to addressing the challenges faced by Rodmell CE Primary School it nonetheless may present an opportunity, worthy of further exploration, for securing a more sustainable future for the school. It could be considered premature to close down this opportunity to explore this partnership.</p> <p>It should be recognised that allowing time to explore this option could have a negative impact on the school as it will extend the period of uncertainty for parents and staff. In this event, to mitigate this the Council and governing body should commit to maintain regular communication. It should also be noted that there is no firm commitment from Iford and Kingston CE Primary School to agree to partnership just a willingness to further explore this option. The Council will investigate and evaluate fully any proposals brought forward by the governing body.</p>
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Impact of the proposals on Teaching Staff

Consultee Comment	County Council Response
<ul style="list-style-type: none"> What will happen to the teaching staff? I will lose my job - in a wonderful school where the children are put first at all times. I will be made redundant and my family will lose a salary. 	<p>Should the current proposals be implemented, the Council would work with the current members of staff, including teaching and support staff in line with the Council's 'Managing Change Policy'. The Council would seek to minimise any compulsory redundancies as a result of the closure. If there are any school-based vacancies in East Sussex that are of interest to those staff at risk of redundancy, colleagues in Personnel and Training would liaise with the school(s) regarding the availability of staff to fill the vacancy, by seeking the agreement of the school to participate in the redeployment process.</p>

Impact on Community

Consultee Comment	County Council Response
<ul style="list-style-type: none"> The school is an integral part of and brings life to this community. It is the heart of the village w 	<p>The Council and the Diocese acknowledge that where a school closure is proposed it will have an impact on the local community, however many pupils travel from Newhaven, Peacehaven and Seaford to attend the school and the larger proportion of children who live in the local area have chosen to attend other schools.</p>

<p>close links to the small church congregation, a major factor in keeping our church and village alive. Closing it will have a detrimental effect on the whole community.</p> <ul style="list-style-type: none"> • The school has served the village for years. The Council should ask why a school in the village could be afforded back in 1856 when there was more poverty, but cannot be afforded now. • Loss of a community asset in my village. Loss of an institution which helps to bring villagers together - young and old. • The village needs to attract fresh young families and provide suitable education for their children. 	<p>The Diocese is fully aware of the impact on a community when it loses its school, church or both but unfortunately because of the circumstances has to consider the long term financial viability of the school, given that the Diocese does not have the financial resources to subsidise small schools.</p>
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Impact of the proposals on other schools

Consultee Comment	County Council Response
<ul style="list-style-type: none"> • Schools in the local area are saying they have no places and are oversubscribed. Where would our children go if the school closes? • I teach at a primary school in Seaford. In Seaford pressure on class numbers is already high with schools fuelled to undermine the spirit of the law limiting reception and KS1 sizes to 30 rationing across key stages. If you take Rodmell out of the equation this pressure then increases, we had 3 from entry imposed on a 2 form entry site. It was awful. 	<p>A full response including the detail on the impact of closing the school on school places, and details of our pupil forecasting methodology and pupil yield for housing development is provided in Appendix B of the report to Cabinet.</p>

Other comments

Consultee Comment	County Council Response
<ul style="list-style-type: none"> • Is this about the Council profiting from the sale of the land • As a democratically 	<p>The Council does not own the Rodmell CE Primary School site and would not therefore profit from the sale of the land.</p> <p>The Diocese owns the school site. The Diocese has no plans for the site and</p>

<p>elected body it is your duty to carry out the will of the people who elected you.</p> <ul style="list-style-type: none"> • There is no public support for these closures and many councillors, including Cllrs Butler and O'Keeffe do not believe the proposal is right. • Will we get a grant for a new school uniform and a bus service? 	<p>will not consider the future of the site until such time as the school's future is determined in order to remain impartial during the consultation. If the decision was taken to close the school and the school site was sold, the proceeds would go into an education foundation account to be invested and used for Education purposes in the Diocese and it would be for the trustees to decide whether the money would be reinvested in the local area to support children who have been displaced from the school. Any reinvestment would have to be in church school provision.</p> <p>Closure of a school is always the last resort and is particularly the case with a small rural primary school. Whilst the Council needs to take account of public opinion it also has a duty to ensure the educational and financial capacity of a school to provide a sustainable good level of education for pupils.</p> <p>There is no uniform grant from the Council however many schools make special arrangements for pupils entitled to Free School Meals.</p>
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Consultation Document

Consultee Comment	County Council Response
<ul style="list-style-type: none"> • Information on the document was inaccurate, factually wrong and misleading. • Federation with another school would not provide sufficient financial benefits – please say what financial benefits would not be provided. • The school has had recommendations that other schools come to see the “inspiring indoor learning environment” in the Reception class and have advised ‘other head teachers to ask advice from the headteacher on how to improve their schools. 	<p>The Council used the latest verified information available at the time of constructing the consultation document.</p> <p>Federation would not increase the pupil numbers at Rodmell CE Primary School and would not therefore bring in any additional income to the school. Whilst federation may help reduce some leadership costs the school is still small and will still face challenges to secure financial stability in the longer term.</p> <p>The school received an Ofsted judgement of ‘Good’ in its last inspection; there has been no formal assessment by Ofsted or the Council since the inspection to indicate that the school is ‘moving towards outstanding’. The Council has, through its work with the school, advised that the school has quickly begun to address the two areas identified for further improvement by Ofsted in November 2015.</p> <p>The Council encourages all schools to learn from good practices. Just under 85% of the schools in East Sussex are Good or Outstanding and most provide advice to others; some schools have the capacity to provide significant additional support to others schools to enable them to move to ‘good’.</p>

8. Petition

- 8.1 During the consultation period a 5,000+ signature petition in relation to the proposed closures of both Rodmell CE Primary School and Pells CE Primary was submitted to the Local Authority. The petition is available for members to view.
- 8.2 The petition was presented at Full Council on 10 May 2016 where the following motion was moved.

In view of the increasing need for Primary School places in and around Lewes in the next five years, the strength of public feeling shown by a petition of over 5,000 signatories and the emerging plans for the future at both Rodmell School and Pells School, the Council recommends to Cabinet that the process towards the closure of these two schools is halted at the end of the consultation to enable these plans to be put into place.

- 8.3 A recorded vote on the motion was requested and taken. The motion was carried, the votes being cast as follows - 28 for the motion and 20 against the motion. In accordance with the Lead Member decision and the resolution of the Council we have sought to look at possible alternative options and to engage with stakeholders to consider any emerging plans that are put forward.

Pupil Forecasting and School Places

1. Introduction

- 1.1 School place planning predictions are derived mainly from the Local Authority's pupil forecasting model. The model produces forecasts of the number of children and young people in state funded primary and secondary schools in East Sussex (including maintained schools, free schools and academies).
- 1.2 The model forecasts pupil numbers:
- Countywide
 - For each district and borough
 - For each primary and secondary school place planning area (based largely on admissions areas)
 - For each individual primary (including infant and junior) and secondary school
- 1.3 In producing pupil forecasts a number of key factors are taken into account. For the purposes of this report these include:
- Existing and planned capacities of school places as well as published intake numbers
 - Existing numbers of pupils in schools (from pupil census data)
 - Births (from ONS data) and resulting primary reception year intakes
 - GP registration data
 - Parental preference for primary reception year
 - Additional pupils arising from new housing development in each area
- 1.4 In the absence of live birth data, longer term predictions are based on ESCC's Policy Based Population Projections of future births.

2. Accuracy of forecasts

- 2.1 The Council's forecasts achieve a good standard of accuracy and compare well to other local authorities. For instance the accuracy of the one year ahead total primary number on roll forecast for the last four years is as follows:

One year forward primary number on roll forecast	
Academic Year	Accuracy
2012/13	+ 0.5%
2013/14	+ 0.4%
2014/15	+ 0.4%
2015/16	+ 0.1%

- 2.1 Note that the Council's forecasts tend to err on the high side.

3 Pupil yield from new housing development

3.1 The pupil forecasts allow for the impact of families with school aged children moving into new housing and creating additional demand across all academic year groups.

3.2 The Council's primary pupil yield factors are as follows:

Pupil yield per new dwelling by property type and size	Houses 2 bed+	Flats 2 bed+	All 1-bed
Primary school yields	0.25	0.0375	0.00

3.3 Pupil yield factors are based on the surveys of residents of new housing development. In 2014 and 2015 the Council commissioned consultants Cognisant Research to undertake a study to review its pupil yield factors. The Cognisant Survey involved a mixture of face to face interviews and self-completion questionnaires with a sample of over 1000 households living in newly built housing across East Sussex.

3.4 This survey found the following 'direct' pupil yields.

Direct pupil yields per new dwelling by property type and size (Cognisant Survey)	Houses 2 bed+	Flats 2 bed+	All 1-bed
Primary school yields	0.32	0.16	0.01

3.5 However, the survey also found that many families who had moved into new housing had not changed their children's school. Cognisant were commissioned to undertake a further analysis of the survey data to take account of this fact. The study also allowed for the possibility that when households move to a new dwelling, the dwelling they vacate could potentially be occupied by a family with children (a phenomenon known as backfill).

3.6 This study resulted in the following 'net yields' per dwelling:

Net yields per new dwelling by property type and size (Cognisant Studies)	Houses 2 bed+	Flats 2 bed+	All 1-bed
Primary school yields	0.23	0.11	0.06

3.7 For houses (the dwelling type where most school aged children are to be found) the net yield analysis not only resulted in a lower primary pupil yield than the direct yield analysis, the net yield was also lower than the existing yield factor for housing.

3.8 While in many respects the net yield analysis represents a more sophisticated calculation of pupil yield, in view of the risk that it may underestimate the true level of pupil yield, Children's Services Senior Management Team decided to continue using the Council's existing pupil yields which give a slightly higher pupil yield for houses. This means our forecasts will over estimate pupil numbers rather than under estimate.

- 3.9 Note that the entire pupil yield from new housing development will not impact on schools all in one year. It will be spread over a number of years and academic year groups. In consequence, some school places used by some children arising from the new housing will be vacated and, therefore, available to later children arising from the new housing.

4. Future forecasts in the Local Area

- 4.1 For the purposes of this report the live birth data for Newhaven and the surrounding parishes of South Highton, Iford, Kingston Piddinghoe, Rodmell and Southease have been combined as the figures in some years for the individual parishes are too small to be included from a data protection perspective.
- 4.2 It should be noted that the average annual birth rate in the Rodmell and Southease Parish in the period 2001/02 (reception year intake 2006/07) to 2010/11 (reception year intake 2015/16) was only 3.4. In the period 2011/12 (reception year intake 2016/17) to 2014/15 (reception year intake 2019/20) the average annual birth rate was even lower at 2.5.
- 4.3 The table below looks at the historical relationship between births and primary reception year intakes in the Newhaven schools, Iford and Kingston CE Primary School and Rodmell CE Primary School over the last seven years. Children choosing to travel from Peacehaven and Seaford to attend Rodmell CE Primary School average out at less than two per year and have therefore been excluded from this analysis. The Local Authority's pupil forecasts for Peacehaven and Seaford indicate there will be sufficient reception year places in each town to meet future demand.

Births v reception intakes (Newhaven and the surrounding parishes of South Highton, Iford, Kingston, Piddinghoe, Rodmell and Southease)	2004/05 (2009/10 intake)	2005/06 (2010/11 intake)	2006/07 (2011/12 intake)	2007/08 (2012/13 intake)	2008/09 (2013/14 intake)	2009/10 (2014/15 intake)	2010/11 (2015/16 intake)
Combined live births (from ONS data)	148	159	164	183	171	174	181
Reception year intakes	136	140	153	179	153	174	176

- 4.4 As the table illustrates, generally there has been a lower uptake of school places than births in the area reflecting either children moving away before they reach school age, parents choosing schools outside of the local area or opting to send their children to the independent sector.
- 4.5 Pupil forecasts for the following academic year (2016/17) are based on admissions allocations on National Offer Day and allow the Local Authority to make a firm prediction on numbers.
- 4.6 Pupil forecasts for the following three academic years (2017/18 to 2019/20) use actual birth data, GP registrations at 31 August 2015. The forecasts take account of the historic relationship between births and GP registrations and the resulting reception year numbers (reception year numbers tend to be lower) but also make an allowance for additional children moving into the area and requiring a reception year place as a result of new housing development.
- 4.7 The table below provides the birth and GP registration data and the admissions allocations (where applicable) for the next four academic years for the area.

Births and GP registrations (Newhaven and the surrounding parishes of South Heighton, Iford, Kingston, Piddinghoe, Rodmell and Southease)	2016/17 (2011/12 births)	2017/18 (2012/13 births)	2018/19 (2013/14 births)	2019/20 (2014/15 births)
Combined live births (from ONS data)	191	164	162	178
GP registration data at 31 August 2015	213	167	171	161
Admissions allocations April 2016	214	n/a	n/a	n/a

4.8 Longer term forecasts are based on ESCC's Policy Based Population Projections which take account of the impact of planned new housing development on future levels of births. Forecasts based on longer term population projections are naturally less certain than forecasts benefitting from actual data on school admissions, live births or GP registrations.

4.9 Based on all of the data outlined above, the Local Authority has produced a forecast of future primary reception year intakes in the area. The table below illustrates the forecasts.

Primary reception year forecast	PAN	2016/17	2017/18	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31
Rodmell CE Primary School	9	4	5	7	9	9	9	9	9	9	9	9	9	9	9	9
Newhaven schools	150	180*	131	135	140	133	133	134	139	139	139	140	140	140	140	140
Iford and Kingston CE Primary School	30	30	25	28	30	30	30	30	30	30	30	30	30	30	30	30
Totals	189	214	161	170	179	172	172	173	178	178	178	179	179	179	179	179

* Includes a bulge reception year intake of 60 at Newhaven Academy

4.10 From around 2023/24 the demographic based forecasts indicate that places might be tight in the area as a result of ongoing housing development in Newhaven (assuming Rodmell CE Primary School were to close in August 2017). If at any point in the future temporary shortfalls were to appear in the Newhaven area as a result of housing developments in Newhaven, there is capacity at other schools in the town to provide one off bulge classes if required.

5. School places available in the local area

5.1 The table below sets out the predicted number of spaces available in other schools in the local area were Rodmell CE Primary School to close on 31 August 2017. The information is based on year group numbers provided by the schools in May and June 2016 rolled forward two academic years. Reception and Year 1 numbers are based on the intake forecasts set out in Table 3 above.

Space available at alternative schools	Predicted number on roll by year group 2017/18							
	R	1	2	3	4	5	6	Total
Rodmell CE Primary School								
Pupil numbers by year group	5	4	8	9	6	4	4	40
Iford & Kingston CE Primary School								
Pupil numbers by year group	25	30	30	31	29	26	25	196
Year Group PANs	30	30	30	30	30	30	30	210
Spaces available	5	0	0	0	1	4	5	14
Newhaven schools								
Pupil numbers by year group	134	180	138	142	129	153	126	1002
Year Group PANs	150	180	150	150	150	150	120	1050
Spaces available	16	0	12	8	21	0	0	57
Peacehaven schools								
Pupil numbers by year group	201	231	192	221	207	214	195	1461
Year Group PANs	210	240	210	240	210	210	210	1530
Spaces available	9	9	18	19	3	0	15	73
Seaford schools								
Pupil numbers by year group	230	237	235	235	237	218	215	1607
Year Group PANs	240	240	270	240	240	210	210	1650
Spaces available	10	3	35	5	3	0	0	56

Source: Data provided by schools to the Admissions Team in May/June 2016

Pupil numbers for Reception to Year 4 are rolled forward for 2017/18 (e.g. current Year 4 is shown as Year 6 in 2017/18)

Pupil numbers for Reception and Year 1 are taken from the provisional intake forecasts for 2016/17 and 2017/18

Year group PANs have been adjusted to take account of existing and proposed bulge classes.

- 5.2 The Local Authority believes there will be sufficient places available in other schools in the area for children from Rodmell CE Primary School were it to close, although a shortfall of places might occur in Years 1, 5 and 6 in Newhaven depending on where children live. This would need to be addressed in collaboration with the other schools in the area.

6. Conclusion

- 6.1 The majority of children attending Rodmell CE Primary School do not live within the local area to the school. Only 19% of pupils attending the school at the January 2016 census came from the community area. The significant majority of children living in the community area choose to attend other local schools. No child allocated a reception year place for September 2016 lives in the school's community area.
- 6.2 Even if Rodmell CE Primary School were to fill to capacity it would remain a very small school (63 places). There are insufficient pupils in the community area now, and predicted for the future, to sustain an educationally and financially viable primary school in the long term without relying on attracting pupils from areas closer to other schools.

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Appendix C

Criteria for the Evaluation of Proposals for Partnership

Proposal Name	School Audit Framework and Proposal
Proposal Submitted by	Campaign Group ‘Save Our Sussex Schools’ – a local campaign group set up by parents in response to the consultation of the proposed closure of the school
Date submitted	27 May 2016
Governing Body Approval?	The Governing Body is not aware of the proposal.
Evaluation Date	June 2016
Overall assessment	<p>The proposal sets out a commitment from the ‘Save Our Sussex Schools’ group to endeavour to secure the future of the school, but the plan is not sufficiently robust to show how this will be achieved.</p> <ul style="list-style-type: none"> • This is not a credible proposal because: <ul style="list-style-type: none"> ○ It does not address the challenges the school faces of low pupil numbers and financial instability, whilst demonstrating sustained pupil performance. ○ No business plan has been submitted as part of the proposal to demonstrate financial viability ○ The plan includes the statement that: <i>‘we accept that the school has areas it needs to improve on to help it run as an efficient and modern primary school’</i> but provides no solution to the issues identified. • The proposal is heavily reliant on fundraising and contributions from parents which is not sufficiently robust to ensure the proposals can be achieved. Part of this fundraising is to secure improved quality of provision and teaching. This is therefore not a sustainable approach to school improvement.

	<ul style="list-style-type: none"> • The objective to seek a partnership/federation with another school would offer a more sustainable model, though no specific school is identified in the proposal and no budget plans presented. • The proposal does not set out how the school's Ofsted outcome, November 2015, will be built on and sustained, other than the continuation of current teaching and learning methodology. Without an evolving curriculum, the needs of the pupils at Rodmell will not be sufficiently met. • There is no strategy for addressing safeguarding or reference to 'Keeping Children Safe' in terms of the number of additional adults each child will encounter regularly, especially with regard to the proposals for bus transport.
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Criteria for Evaluation:

All proposals will be assessed against the key areas set out below.

1. **Vision**
2. **Education Plan**
3. **Capacity and Capability**
4. **Evidence of strong track record**
5. **Financial Sustainability**

	Criteria	Comments
1	Vision	
	Is there a clear vision set out for the partnership?	The vision is set out in very broad terms, mainly based on the need to secure the continuance of the school, but it is not robust and it is not clear how this will be achieved.
	Is there evidence that leaders of both schools are committed to the vision?	No. No other specific school partners are named.
	Is the vision appropriate for the particular context of the schools?	The objectives reflect some concerns raised as part of the proposed consultation on the closure of the school. Examples include the need to secure a new headteacher and increased pupil numbers. However, there is no indication of how this will be achieved.

	Criteria	Comments
2	Education Plan	
	Is there a curriculum plan which is consistent with the vision and pupil intake?	<p>The proposal indicates that no changes will be made to teaching and learning. <i>'We feel that the teaching side of the school is performing exceptionally well and will not be looking to review this or have any input as this will be left in the capable hands of the wonderful teachers and staff at the school and the (hopefully soon) incoming headteacher.'</i></p> <p>This indicates that the needs of the pupil intake will not be reviewed which will impact negatively on the quality of provision and outcomes. This is a particular weakness in the proposal given that the school will be reorganised from 3 classes to 2 which will have major implications for curriculum planning and delivery. The proposal does not refer to this re-organisation of classes or consider the impact of this.</p>
	Are the key issues/priorities for improvement clear?	Objectives are set out however they lack clarity as to how they will impact on outcomes.
	Does the proposal make reference to key issues from the most recent Ofsted inspection and/or external review?	<p>The only reference to key Ofsted issues is the acknowledgement of the school's 'Good' rating in November 2015. The areas for improvement following the inspection have not been identified as objectives.</p> <p>The idea put forward that the group will: <i>'Support teachers and staff and aim to raise funds for things they feel they need to achieve the outstanding Ofsted rating'</i> shows a</p>

	Criteria	Comments
		lack of understanding of teaching and learning and what is required to secure an 'Outstanding' Ofsted judgement.
	Does the proposal identify activity that will address the issues identified in the school's self-evaluation and, in particular, issues raised by the most recent data analysis?	No reference is made to the school's self-evaluation or data analysis. No reference is made to the recent adviser visits.
	Are targets set for attainment, progress, attendance and quality of teaching, including for vulnerable groups?	No. There are no measurable criteria in the proposal.
	Are there short-term targets of interim milestones?	No. There are no short term targets in the proposal.
	Is it clear how actual performance will be measured against targets?	No. There is no detail in the proposal which reflects how actual performance will be measured against targets.
	Are clear success criteria/practice indicators identified for improving the quality of provision in the school?	No. This is a significant weakness of the proposal.
3	Capacity and Capability	
	Is the leadership structure detailed, is there sufficient capacity?	The plan identifies the need to recruit a new headteacher but it gives no indication of any recruitment strategy or how a new headteacher will be secured, other than a reference to the: <i>'(hopefully soon) incoming headteacher'</i> . The plan does not consider the salary implications given the current budget position or the challenges around recruitment to small schools. The leadership proposals do not include detail around partnership, executive

	Criteria	Comments
		headteacher or head of school roles which also need budget considerations.
	Is there a clear staffing structure proposed?	No. There are no plans to deviate from the current structure. However the school's current 3 year budget plan reduces from 3 to 2 classes due to falling pupil numbers and budget constraints. Therefore, this plan needs to clarify the number of classes and delivery model.
	Is there a detailed plan for the implementation of the proposal?	No. Objectives only are set out but there is no detailed plan for their implementation. The proposal recognises that it is not ' <i>a formal proposal but will hopefully form the building blocks for a review of Rodmell CE School and help us put together a business plan</i> '.
	Are there timescales for actions?	No. There is reference to a five year plan only and this is not included in this proposal. No business plan has been included with the proposal.
	Is it clear who is leading on each aspect of the proposal?	No. No personnel are referenced.
	Is it clear how the proposal will be monitored, and by whom?	No. There is no monitoring built into the proposal.
	Is it clear how the impact of the proposal will be evaluated, and by whom?	No. There is no evaluation built into the proposal.
	Is the role of governors in evaluating progress clear?	No. There is no governance built into the proposal.
	Is the proposal manageable and achievable?	No. The proposal is not significantly robust to be either manageable or achievable.

	Criteria	Comments
	Will the proposal enable the school to move up to the next inspection category within the agreed timescale?	No evidence is provided in the proposal to suggest how this can be achieved.
	Is there a clear partnership agreement in place, or a timetable to ensure an agreement is in place?	There is no school identified for the agreement, or a timescale for this identification, implementing a partnership agreement or working in partnership.
4	Evidence of Strong Track Record	
	Do those submitting the proposal have a strong track record in successful partnership working?	No evidence of a good track record of partnership working from those submitting the proposal.
	Do those submitting the proposal have a strong track record of improving pupil outcomes, including for vulnerable groups?	No evidence of a good track record of improving pupil outcomes from those submitting the proposal.
	Do those submitting the proposal have a strong track record of financial management?	No evidence of a good track record of financial management from those submitting the proposal.
5	Financial Sustainability	
	Is it clear how the proposal will be financially affordable for the next three years?	<p>The proposal is heavily reliant on fundraising from parents and other potential sources. There are only 38 families that send their children to Rodmell - this is a very small number who would be tasked with a long term challenge to secure a sustainable income for the school. This is not a sustainable model for the future.</p> <p>One of the objectives is to seek a federation/partnership with another school – this may provide a more financially secure model. However the Council's Area Review</p>

	Criteria	Comments
		<p>process concluded that this would not necessarily secure financial sustainability for the school as it is so small and a federation would not help resolve the issue of there being so few children living in the community area or the constraints of the building which restrict the school's capacity to increase pupil numbers.</p> <p>There is no budget plan submitted with the proposal. The local authority is providing financial resources to the school to enable it to balance its budget for this year. The significant reduction in resources that the school have planned for the next three years means that there is no contingency or flexibility built into the school's budget. The plan's statement that the group will: <i>'Look to implement savings on running costs and areas parents can help out in'</i> does not provide a robust financial model for the school. There are no further efficiencies that can be made to the budget and fundraising is not a sustainable approach to running a school.</p> <p>The local authority is conducting monthly monitoring in the current financial year of the school's budget given the vulnerabilities and lack of flexibility in the current budget.</p>
	Is it clear how the proposal will have a positive impact on the schools' financial income/increase pupil numbers?	<p>The proposal sets out a desire to increase the capacity of the school to 75-80 pupils (48 pupils on roll at January 2016) by re-configuration and parent fundraising. However, pupil forecast data does not support the demand/need for places from the local community area.</p>

	Criteria	Comments
		<p>Fundraising is not a robust approach to school expansion projects given the significant costs involved.</p> <p>The proposal is reliant on fundraising which is not a robust basis for sustained school improvement.</p>

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**Rodmell CE (Aided)
Primary School**



Rodmell CE School

School Audit Framework & Proposal

Index

1. Summary
2. Highlights of The Consultation Process
3. Objectives
4. Keys to Success
5. Conclusions

Summary

This report has been prepared by the campaign group Save Our Sussex Schools with input from the National Association of Small Schools and parents from several primary schools across UK who have survived proposed closures such as ours. It is not a formal proposal but will hopefully form the building blocks for a review of Rodmell CE School and help us put together a business plan for the school.

We feel that the teaching side of the school is performing exceptionally well and will not be looking to review this or have any input as this will be left in the capable hands of the wonderful teachers and staff at the school and the (hopefully soon) incoming headteacher. Following the county councils review of Rodmell CE School and its decision to consult on its closure we have been looking at concerns raised by the Lewes Area Review and its analysis of the school. Though we do not agree with all the data and proposals the review made, we accept that the school has areas it needs to improve on to help it run as an efficient and modern primary school.

We hope that the following document will set out how we would like an internal review process of the school to be carried out that will involve parents, teachers, pupils, governors and the council and diocese.

Highlights from The Consultation Process

Though the consultation has been very strenuous on all parties we must look to take the positive parts from it to move forward, we feel the following points highlight some strengths shown by the school.

- Strong support from the parents and families of the schools current and former pupils, governors and teachers/staff to save the school and the team spirit of everyone involved with the school.
- Acknowledgement of the schools Good Ofsted rating and inspirational teaching methods which the council have themselves highlighted to other schools.
- Increased public awareness of the school and the positive image it has been presented in.
- Clear objectives for the school to meet to improve the councils support for the school.
- Parents willingness to help in the running of the school and offers of help from outside sources.

Objectives

We believe we can now take the school forward; we hope to use this document as a basis to create a five-year plan to achieve the following objectives:

- Recruit a new head teacher
- Create a partnership/federation with another school to share resources and cut costs
- Strive to achieve an outstanding Ofsted rating through continued high quality teaching
- Look to implement savings on running costs and areas parents can help out in.
- Create a more formal parent group who will help run the marketing to prospective parents/pupils and increase fundraising efforts.
- Steadily increase pupil numbers year on year until capacity reached

Keys to Success

To achieve our objectives, we will be looking to develop plans and policy's in the following areas:

- Create PTA or similar group to replace “The Friends of Rodmell” who will have two main duties to the school. Marketing and Fundraising.
- Support teachers and staff and aim to raise funds for things they feel they need to achieve the outstanding Ofsted rating.
- Use parent help to try and lower costs through donations of time, materials, work that will help school budget.
- Use a team of architects, interior designers, builders, teachers and parents to look at school and its layout and see if we can increase capacity of school to around 75-80 pupils through intelligent design and reconfiguration. Funding for this has already been put in place by parents. any subsequent building works will be carried out with grants, fundraising and donations of labour and materials all organised by new parent group. Increasing capacity will help lower budget share per pupil and reconfiguration will incorporate designs to help school achieve outstanding ofsted rating. As council were willing to allow over capacity classrooms in closure plans, they must look at our request to increase our class sizes.
- Create marketing team and have new website and marketing package created to help attract more parents. Parents will help with open days and meeting with new parents to ensure Rodmell achieves higher first choices by parents.
- Create car share system to increase options for parents from Newhaven/Peacehaven to get kids to/from school.
- Try and organise new bus service from CTA or similar organization and ensure parent rota setup to make sure min of two parents are on there to get kids on/off bus and make sure they behave.
- Approach village parish council and farmer to see if we can acquire the use of any pieces of land nearby to create outside learning space, this will add an extra dimension to learning and make school more attractive to prospective parents.

Conclusions

We hope that the council will allow us to develop this plan and agree to stop the consultation to close. We have had an overwhelming public response over the past few months and the parent group have rallied together, we need to harness this support and put it to good use in keeping this school open for generations to come.

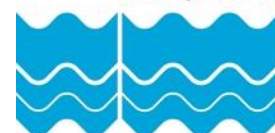
Dear Councillor Bennett, this is a good Ofsted rated school with potential to become outstanding, please do not throw this wonderful school away.

Equality Impact Assessment - Risk Summary Chart: Proposed recommendation to halt the proposed closure of Rodmell CE Primary School.

This summary chart shows the risks that have been identified through the EQIA and the mitigation in place to manage these risks.

Protected Characteristics Potential negative impact	Potential legal challenge and reputational damage to Council	Mitigation	Accepted Risks
Age Reception class – Year 5 pupils currently at the school plus reception pupils on roll due to start September 2016	The decision to halt the closure will lead to a period of uncertainty about the future of the school.	The local authority will work with the school to ensure that the school and the local community are kept well informed about the progress of the consultation process, including providing information about any new proposal submitted and the timelines for any further stage of consultation.	Some pupils may be unsettled by the uncertainty and this could impact on their learning outcomes.
Disability Data indicates that children with SEN are over represented at Rodmell CE Primary school.	The decision to halt the closure will lead to a period of uncertainty about the future of the school.	The local authority will work with the school to ensure that the school and the local community are kept well informed about the progress of the consultation process, including providing information about any new proposal submitted and the timelines for any further stage of consultation.	Some pupils may be unsettled by the uncertainty and this could impact on their learning outcomes.
Religion, belief The proposal will predominantly affect children whose families have chosen to send their children to a denominational school.	The decision to halt the closure will lead to a period of uncertainty about the future of the school.	The local authority will work with the school to ensure that the school and the local community are kept well informed about the progress of the consultation process, including providing information about any new proposal submitted and the timelines for any further stage of consultation.	Some pupils may be unsettled by the uncertainty and this could impact on their learning outcomes.
Other: Socio-Economic Rodmell school has a higher % of pupils eligible for free school meals than average.	The decision to halt the closure will lead to a period of uncertainty about the future of the school.	The local authority will work with the school to ensure that the school and the local community are kept well informed about the progress of the consultation process, including providing information about any new proposal submitted and the timelines for any further stage of consultation.	Some pupils may be unsettled by the uncertainty and this could impact on their learning outcomes.

Protected Characteristics Potential negative impact	Potential legal challenge and reputational damage to Council	Mitigation	Accepted Risks
Gender/Transgender Boys are over represented at Rodmell.	The decision to halt the closure will lead to a period of uncertainty about the future of the school.	The local authority will work with the school to ensure that the school and the local community are kept well informed about the progress of the consultation process, including providing information about any new proposal submitted and the timelines for any further stage of consultation.	Some pupils may be unsettled by the uncertainty and this could impact on their learning outcomes.



Equality Impact Assessment

Project or Service Template

Name of the proposal, project or service
Recommendation to halt the closure of Rodmell CE Primary School

File ref:	Rodmell	Issue No:	1
Date of Issue:	May 2016	Review date:	October 2016

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Part 1 – The Public Sector Equality Duty and Equality Impact Assessments (EIA)

1.1 The Council must have due regard to its Public Sector Equality Duty when making all decisions at member and officer level. An EIA is the best method by which the Council can determine the impact of a proposal on equalities, particularly for major decisions. However, the level of analysis should be proportionate to the relevance of the duty to the service or decision.

1.2 This is one of two forms that the County Council uses for Equality Impact Assessments, both of which are available on the intranet. This form is designed for any proposal, project or service. The other form looks at services or projects.

1.3 The Public Sector Equality Duty (PSED)

The public sector duty is set out at Section 149 of the Equality Act 2010. It requires the Council, when exercising its functions, to have “due regard” to the need to

- Eliminate discrimination, harassment, victimisation and any other conduct that is prohibited under the Act.
- Advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it;
- Foster good relations between persons who share a relevant protected characteristic and persons who do not share it. (see below for “protected characteristics”

These are sometimes called equality aims.

1.4 A “protected characteristic” is defined in the Act as:

- age;
- disability;
- gender reassignment;
- pregnancy and maternity;
- race (including ethnic or national origins, colour or nationality)
- religion or belief;
- sex;
- sexual orientation.

Marriage and civil partnership are also a protected characteristic for the purposes of the duty to eliminate discrimination.

The previous public sector equalities duties only covered race, disability and gender.

1.5 East Sussex County Council also considers the following additional groups/factors when carry out analysis:

- Carers – A carer spends a significant proportion of their life providing unpaid support to family or potentially friends. This could be caring for a relative, partner or friend who is ill, frail, disabled or has mental health or substance misuse problems. [Carers at the Heart of 21st Century Families and Communities, 2008]
- Literacy/Numeracy Skills

- Part time workers
- Rurality

1.6 Advancing equality (the second of the equality aims) involves:

- Removing or minimising disadvantages suffered by people due to their protected characteristic
- Taking steps to meet the needs of people from protected groups where these are different from the needs of other people including steps to take account of disabled people's disabilities
- Encouraging people from protected groups to participate in public life or in other activities where their participation is disproportionately low

NB Please note that, for disabled persons, the Council must have regard to the possible need for steps that amount to positive discrimination, to "level the playing field" with non-disabled persons, e.g. in accessing services through dedicated car parking spaces.

1.6 Guidance on Compliance with The Public Sector Equality Duty (PSED) for officers and decision makers:

1.6.1 To comply with the duty, the Council must have "due regard" to the three equality aims set out above. This means the PSED must be considered as a factor to consider alongside other relevant factors such as budgetary, economic and practical factors.

1.6.2 What regard is "due" in any given case will depend on the circumstances. A proposal which, if implemented, would have particularly negative or widespread effects on (say) women, or the elderly, or people of a particular ethnic group would require officers and members to give considerable regard to the equalities aims. A proposal which had limited differential or discriminatory effect will probably require less regard.

1.6.3 Some key points to note :

- The duty is regarded by the Courts as being very important.
- Officers and members must be aware of the duty and give it conscious consideration: e.g. by considering open-mindedly the EIA and its findings when making a decision. When members are taking a decision, this duty can't be delegated by the members, e.g. to an officer.
- EIAs must be evidence based.
- There must be an assessment of the practical impact of decisions on equalities, measures to avoid or mitigate negative impact and their effectiveness.
- There must be compliance with the duty when proposals are being formulated by officers and by members in taking decisions: the Council can't rely on an EIA produced after the decision is made.
- The duty is ongoing: EIA's should be developed over time and there should be evidence of monitoring impact after the decision.
- The duty is not, however, to achieve the three equality aims but to consider them – the duty does not stop tough decisions sometimes being made.

- The decision maker may take into account other countervailing (i.e. opposing) factors that may objectively justify taking a decision which has negative impact on equalities (for instance, cost factors)

1.6.4 In addition to the Act, the Council is required to comply with any statutory Code of Practice issued by the Equality and Human Rights Commission. New Codes of Practice under the new Act have yet to be published. However, Codes of Practice issued under the previous legislation remain relevant and the Equality and Human Rights Commission has also published guidance on the new public sector equality duty.

Part 2 – Aims and implementation of the proposal, project or service

2.1 What is being assessed?

a) Proposal or name of the project or service.

The recommendation to halt the proposed closure of Rodmell CE Primary School with effect from 31 August 2017.

c) What is the main purpose or aims of proposal, project or service?

The recommendation to agree to halt the proposed closure of Rodmell CE Primary School and allow the school until the end of Term 4 in March 2017 to submit a firm and viable partnership proposal to the Local Authority which sets out the educational and business benefits that would ensure a sustainable future model for the school.

It is the local authority's duty to ensure that there are sufficient places across the County to accommodate all pupils of statutory school age. The local authority must also consider its duty to promote high education standards, ensure fair access to educational opportunity and promote the fulfilment of every child's educational potential with the aim of enabling children to take up a school place within their local community.

In October 2014 the Lead Member agreed that a review of primary schools should be undertaken in the Lewes area. The Area Review raised significant concerns about the long term sustainability of Rodmell CE Primary School in terms of the risks to its financial stability, securing good outcomes for pupils and its ability to attract pupils from within its community area.

The majority of children attending Rodmell CE Primary School do not live within the local area to the school. Only 19% of pupils attending the school at the January 2016 census came from the community area. Even if the school were to fill to capacity it would remain a very small school (63 places). The average annual birth rate in the Rodmell and Southease Parish in the period 2001/02 (reception year intake 2006/07) to 2010/11 (reception year intake 2015/16) was 3.4. In the period 2011/12 (reception year intake 2016/17) to 2014/15 (reception year intake 2019/20) the average annual birth rate was 2.5. The local authority is concerned that there are insufficient pupils in the community area now, and predicted for the future, to sustain an educationally and financially viable primary school in the long term without relying on attracting pupils from areas closer to other schools.

For these reasons and having considered alternative options including federation, amalgamation and academisation, the local authority sought approval from the Lead Member for Education and Inclusion, Special Educational Needs and Disability on 21 March 2016 to consult on a proposal to close Rodmell CE Primary School.

Following the consultation period and an analysis of the consultation responses and a range of other information, including a previous EqlA on the impact of the proposed closure, a recommendation is now being put forward to halt the closure to allow the school to put forward a sustainable future partnership model.

e) Manager(s) and section or service responsible for completing the assessment

Gary Langford, Place Planning Manager, Standards and Learning Effectiveness Service

The Equality Impact Assessment was contributed to by the relevant local authority officers.

2.2 Who is affected by the proposal, project or service? Who is it intended to benefit and how?

Children and their families, staff and the local community. The main beneficiaries will be the pupils currently at Rodmell CE Primary School. All pupils at the school will be affected by a period of uncertainty about the future of the school.

2.3 How is, or will, the proposal, project or service be put into practice and who is, or will be, responsible for it?

The East Sussex County Council Cabinet is responsible for making the final decision on the proposal. If the recommendation to halt the proposed closure is agreed, the governing body of Rodmell CE Primary School must submit a firm and viable proposal by the end of Term 4 in March 2017. The proposal must detail the educational and business benefits that would ensure a sustainable future model for the school. CSD would review the proposal during Term 5 with a view to making a decision before the end of the academic year

2.4 Are there any partners involved? E.g. NHS Trust, voluntary/community organisations, the private sector? If yes, how are partners involved?

Rodmell CE Primary School is a Voluntary Aided school. The Diocese of Chichester shared our concerns about the long term sustainability of Rodmell CE Primary School in terms of the risks to its financial stability, securing good outcomes for pupils and its ability to attract pupils from within its community area. The Diocese agreed that the Council should consult with key stakeholders about the proposed closure of the school.

2.5 Is this proposal, project or service affected by legislation, legislative change, service review or strategic planning activity?

Proposals for closure have to follow a prescribed process established by the Education and Inspections Act 2006 (EIA 2006) as up dated by the Education Act 2011 and the School Organisation (Establishment and Discontinuance of Schools) (England) Regulations 2013.

Background documents:

Report to the Lead Member for Education and Inclusion, Special Educational Needs and Disability on 21 March 2016:

<http://esmoderngov01v/ieListDocuments.aspx?CId=456&MId=2867&Ver=4>

2.6 How do people access or how are people referred to your proposal, project or service? Please explain fully.

If the recommendation to halt the closure process is agreed current pupils at the school would continue to have a place and the school could continue to accept new pupils. Parents would still be able to apply for a place at the school for academic year 2017/18. The East Sussex County Council Admissions booklet would explain the current situation with regard to the closure proposals so that parents are aware of the situation.

2.7 If there is a referral method how are people assessed to use the proposal, project or service? Please explain fully.

N/A

2.8 How, when and where is your proposal, project or service provided? Please explain fully.

As referred to in 2.5 above, the local authority must follow a prescribed process in proposing closure of a school. It cannot shorten the process. The local authority has a legal obligation to educate any child that wishes to remain at the school until the date of closure.

Part 3 – Methodology, consultation, data and research used to determine impact on protected characteristics.

3.1 List all examples of quantitative and qualitative data or any consultation information available that will enable the impact assessment to be undertaken.

Types of evidence identified as relevant have X marked against them			
	Employee Monitoring Data		Staff Surveys
X	Service User Data		Contract/Supplier Monitoring Data
X	Recent Local Consultations		Data from other agencies, e.g. Police, Health, Fire and Rescue Services, third sector
	Complaints		Risk Assessments
	Service User Surveys	X	Research Findings
X	Census Data	X	East Sussex Demographics
	Previous Equality Impact Assessments		National Reports
	Other organisations Equality Impact Assessments		Any other evidence?

3.2 Evidence of complaints against the proposal, project or service on grounds of discrimination.

The consultation responses on the proposed closure demonstrate that the majority of parents, pupils, staff, and the local community are against the proposed closure. A number of respondents have cited the impact on the proposals on individual pupils. Some respondents have also cited that the closure of the school will lead to less choice for parents who wish to send their pupils to a small school and/or a faith school. The responses from this consultation would suggest that the recommendation to halt the consultation process would be welcomed by respondents.

3.3 If you carried out any consultation or research on the proposal, project or service explain what consultation has been carried out.

In October 2014 the Lead Member agreed that a review of primary schools should be undertaken in the Lewes area. The area review process involved the preparation of data packs between autumn and spring 2015 and the holding of internal meetings with Officers and Diocesan colleagues in the spring and of stakeholder meetings in June 2015. Information and evidence from the review informed the decision to seek approval to consult on proposed closure of Rodmell CE Primary School. The Lewes Area Review Report is included as an Appendix to the Report to the Lead Member for Education and Inclusion, Special Educational Needs and Disability on 21 March 2016:

<http://esmoderngov01v/ieListDocuments.aspx?CId=456&MId=2867&Ver=4>

A six week public consultation on the proposed closure of Rodmell CE Primary School commenced on 15 April and ran until 27 May 2016. Hard copies of the Local Authority's consultation document were distributed to approximately 1,420

key stakeholders and interested parties which included pupils, parents and carers, staff other local schools, trade unions, the District Council and Parish Councils, the local MP, the Church of England and Catholic Dioceses and the wider local community. The consultation document was also available on the ESCC website at: https://consultation.eastsussex.gov.uk/consultation_finder

A meeting was held with school staff and their union representatives on 22 April 2016 to provide the opportunity for officers to provide more detail about the proposal and for those attending to ask questions and raise concerns. Notes were taken at this meeting and a Question and Answer (Q&A) document was prepared and sent to the headteacher to distribute to staff.

A public meeting was held in the Church of St Peter, Rodmell on the 3 May 2016 to provide more detail about the proposal and enable parents, carers and all interested parties to ask questions and raise concerns. Notes were taken at this meeting and a Q&A document responding to the key issues raised was produced and posted on the Local Authority's website for people to view. This can be viewed in section 5 of the Consultation Report attached at **Appendix A**.

The children of Rodmell CE Primary School were encouraged to express their views. An officer from the Local Authority met with representatives of the school council on 24 May 2016. 27 letters were also received from pupils. The feedback received from pupils can be viewed in Section 6 of the Consultation Report attached at **Appendix A**.

Consultation Responses

118 consultation responses were received during the consultation period of which 85 were completed on line and 33 forms were returned via freepost. It should be noted that a number of duplicate responses were made. In addition

- 1 letter was received
- 2 emails were received
- The governing body of Rodmell CE Primary School submitted an 'Audit Framework and Proposal' to the Director of Children's Services
- 10 respondents emailed members of Cabinet directly

Where known the following stakeholders responded to the consultation

- 27 parents/carers of a child at Rodmell CE Primary School
- 5 pupils at Rodmell CE Primary School
- 9 members of staff at Rodmell CE Primary School
- 4 members of the governing body at Rodmell CE Primary School
- 40 members of the local community
- 31 other (a local teacher, East Sussex resident, Local MP, local nursery owner, former pupils, friends and relatives of parents with children at the school and of staff at the school, parents of children at local schools, teachers at local schools, past pupils, teacher/union rep, visiting professional, Rodmell Parochial Church Council)
- 2 not answered

During the consultation period a 5,000+ signature petition in relation to the proposed closures of both Rodmell CE Primary School and Pells CE Primary School was submitted to the Local Authority. Petitions must be considered in the light of DfE guidance and the greatest weight should be given to representations

from those stakeholders most likely to be directly affected by the proposals rather than simply taking account of the numbers of people expressing a particular view. The petition does not identify each signatory's relationship to the school and therefore it is difficult to assess whether the opinions are those of stakeholders that should be given the greatest consideration. The petition is available for members to view.

The petition was presented at Full Council on 10 May 2016 where the following motion was moved.

In view of the increasing need for Primary School places in and around Lewes in the next five years, the strength of public feeling shown by a petition of over 5,000 signatories and the emerging plans for the future at both Rodmell School and Pells School, the Council recommends to Cabinet that the process towards the closure of these two schools is halted at the end of the consultation to enable these plans to be put into place.

A recorded vote on the motion was requested and taken. The motion was carried, the votes being cast as follows - 28 for the motion and 20 against the motion.

3.4 What does the consultation, research and/or data indicate about the positive or negative impact of the proposal, project or service?

A number of the consultation responses raise concerns about the impact of the proposed closure on specific pupils at the school including those that are more vulnerable. Respondents stated that they like the fact that Rodmell CE Primary School is a small school with good links to the local community.

The recommendation to halt the closure will impact on families who have children at the school, including those children with Special Educational Needs, boys and those eligible for Free School Meals (FSM) who are all over represented at the school and as such will be disproportionately affected by the proposal.

Agreement to the halt the process of closure will lead to an extended period of uncertainty for pupils at the school for the academic year 2017/18 where the future of the school will not be certain.

• Part 4 – Assessment of impact

4.1 Age: Testing of disproportionate, negative, neutral or positive impact.

a) How is this protected characteristic reflected in the County/District/Borough?

In East Sussex there are 37,389 primary age children attending 152 primary schools. In the Lewes District there are 6,855 primary age children attending 28 primary schools. Rodmell CE Primary School has 48 pupils on roll, this equates to 0.7% of the total primary age population in Lewes District and 0.13% of the county total (source: January 2016 census).

b) How is this protected characteristic reflected in the population of those impacted by the proposal, project or service?

The proposal will predominantly affect children of primary school age whose families have children at the school.

- c) Will people with the protected characteristic be more affected by the proposal, project or service than those in the general population who do not share that protected characteristic?**

The proposal will disproportionately affect children of primary school age whose families have children at the school.

- d) What is the proposal, project or service's impact on different ages/age groups?**

The proposal will impact on the current years up to year five and reception intake in September 2016. It does not affect year 6 and does not affect secondary age children in the town.

- e) What actions are to/or will be taken to avoid any negative impact or to better advance equality?**

The school will continue to provide education and support to all children at the school.

- f) Provide details of the mitigation.**

The local authority will work with the school to ensure that the school and the local community are kept well informed about the progress of the consultation process, including providing information about any new proposal submitted and the timelines for any further stage of consultation.

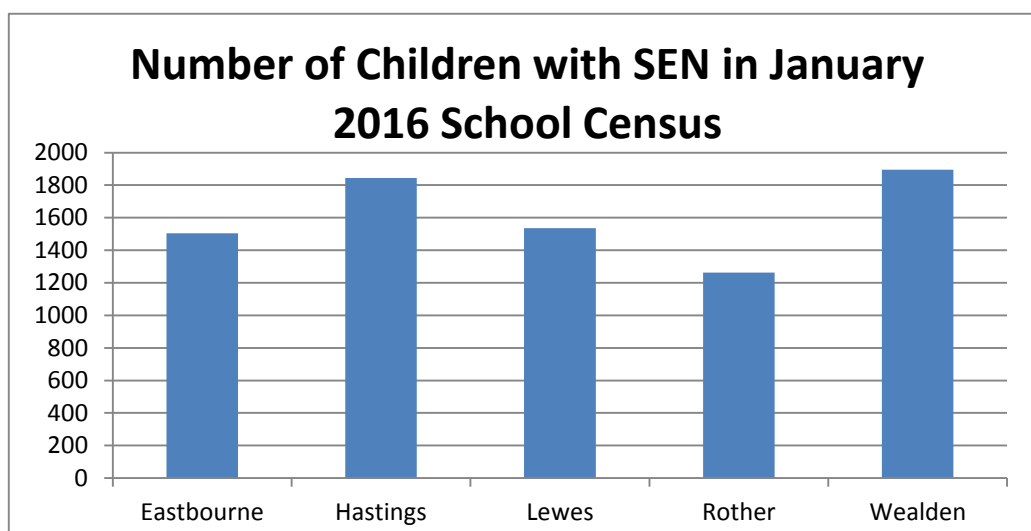
- g) How will any mitigation measures be monitored?**

The Local Authority will continue to work closely with the school to regularly monitor the progress and outcomes of pupils during this time of uncertainty.

4.2 Disability: Testing of disproportionate, negative, neutral or positive impact.

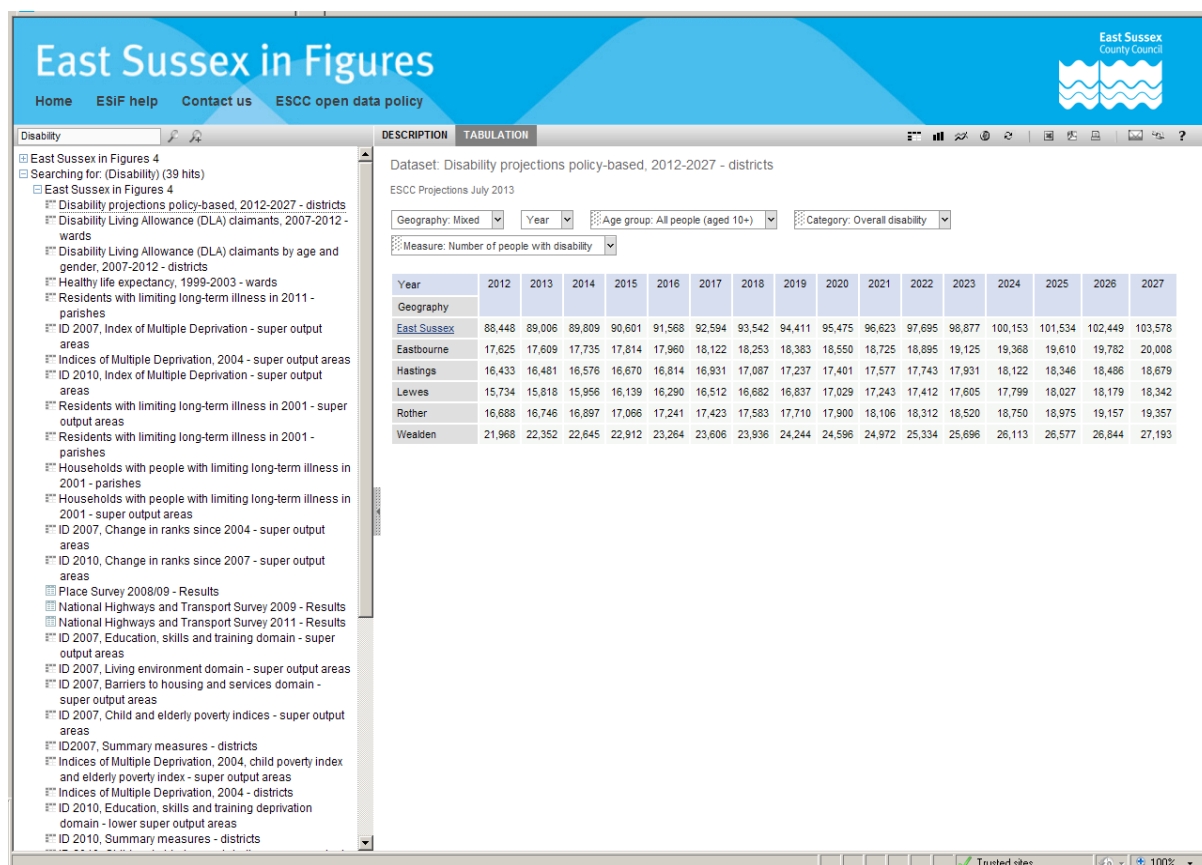
a) How is this protected characteristic reflected in the County /District/Borough?

The following chart shows the number of children recorded as having Special Educational Needs (SEN) in the January 2016 school census (children attending East Sussex maintained primary schools and academies). District/ Borough information relates to pupil's home address as reported in the January 2016 school census.



In East Sussex there were 8,042 children recorded as having Special Educational Needs in the January 2016 school census. The figure for Lewes District was 1,536.

Disability projections published on East Sussex in Figures (ESiF) in July 2013 put the total number of people with a disability in East Sussex at 89,006 for 2013. The figure for Lewes District is 15,818.



b) How is this protected characteristic reflected in the population of those impacted by the proposal, project or service?

The current SEN data for Rodmell CE Primary School shows that the percentage of SEN pupils at the school is 22.9% (11 out of 48). This is significantly higher in comparison to the % average in East Sussex schools of 12.8%

c) Will people with the protected characteristic be more affected by the proposal, project or service than those in the general population who do not share that protected characteristic?

The data indicates that Rodmell CE Primary School is significantly overrepresented by pupils with this characteristic.

d) What is the proposal, project or service's impact on people who have a disability?

Considering the data children with SEN will be disproportionately affected by the proposal.

e) What actions are to/ or will be taken to avoid any negative impact or to better advance equality?

The school will continue to provide education and support to all children at the school.

Provide details of any mitigation?

The local authority will work with the school to ensure that the school and the local community are kept well informed about the progress of the consultation process, including providing information about any new proposal submitted and the timelines for any further stage of consultation.

e) How will any mitigation measures be monitored?

The Local Authority will continue to work closely with the school to regularly monitor the progress and outcomes of pupils during this time of uncertainty.

All schools have to report on the outcomes of all pupils, including SEN pupils. The local authority will continue to monitor the outcomes at all schools for these pupils.

4.3 Ethnicity: Testing of disproportionate, negative, neutral or positive impact. Race categories are: Colour. E.g. being black or white, Nationality e.g. being a British, Australian or Swiss citizen, Ethnic or national origins e.g. being from a Roma background or of Chinese Heritage

a) How is this protected characteristic reflected in the County /District/Borough?

The vast majority of pupils (91.7%) according to the January 2016 school census are of White British Heritage. This is broadly in line with that of the population across the County based on the 2011 census. 10.2% of Lewes district's school population is Black and Minority Ethnic (BME). Of the 48 pupils attending Rodmell CE Primary School where ethnicity is known, 8.3% (1 in 12 pupils) are from ethnic minority backgrounds.

Data for Rodmell CE Primary School indicates that the percentage of pupils with English as an Additional Language (EAL) is 0.0% (years 1-6). This is considerably lower than the East Sussex overall of 5.5%.

b) How is this protected characteristic reflected in the population of those impacted by the proposal, project or service?

BME children are not over represented at Rodmell CE Primary School and as such will not be disproportionately affected by the proposal.

c) Will people with the protected characteristic be more affected by the proposal, project or service than those in the general population who do not share that protected characteristic?

We do not believe that people with the protected characteristic will be more affected by the proposal than those in the general population who do not share that protected characteristic.

d) What is the proposal, project or service's impact on those who are from different ethnic backgrounds?

N/A

e) What actions are to/ or will be taken to avoid any negative impact or to better advance equality?

N/A

f) Provide details of any mitigation.

N/A

g) How will any mitigation measures be monitored?

N/A

4.4 Gender/Transgender: Testing of disproportionate, negative, neutral or positive impact

a) How is this protected characteristic target group reflected in the County/District/Borough?

The percentage of pupils attending the school who are male is **60.4%** and female **39.6%**. This compares to the East Sussex figures of male **51.5%** and female **48.5%**.

b) How is this protected characteristic reflected in the population of those impacted by the proposal, project or service?

The percentage of pupils attending the school who are male is 60.4% and female 39.6%. The following chart shows the gender breakdown of Rodmell CE Primary School by class

Class	Year Groups	Numbers		%	
		F	M	F	M
1	R & 1	5	14	26.3	73.7
2	2 & 3	9	4	69.2	30.8
3	4, 5 & 6	5	11	31.3	68.8

c) Will people with the protected characteristic be more affected by the proposal, project or service than those in the general population who do not share that protected characteristic?

Boys will be disproportionately affected by this proposal as they are significantly over represented in the school.

d) What is the proposal, project or service's impact on different genders?

Because boys are significantly over represented at the school, they are likely to be affected by the proposal.

e) What actions are to/ or will be taken to avoid any negative impact or to better advance equality?

The school will continue to provide education and support to all children at the school.

f) Provide details of any mitigation.

The local authority will work with the school to ensure that the school and the local community are kept well informed about the progress of the consultation process,

including providing information about any new proposal submitted and the timelines for any further stage of consultation.

g) How will any mitigation measures be monitored?

The Local Authority will continue to work closely with the school to regularly monitor the progress and outcomes of pupils during this time of uncertainty.

All schools have to report on the outcomes of all pupils, including an analysis by gender. The local authority will continue to monitor the outcomes at all schools for these pupils.

4.5 Marital Status/Civil Partnership: Testing of disproportionate, negative, neutral or positive impact.

a) How is this protected characteristic target group reflected in the County/District/Borough?

We do not consider marital status/civil partnership characteristics to be relevant to the proposal.

b) How is this protected characteristic reflected in the population of those impacted by the proposal, project or service?

N/A

c) Will people with the protected characteristic be more affected by the proposal, project or service than those in the general population who do not share that protected characteristic?

N/A

d) What is the proposal, project or service's impact on people who are married or same sex couples who have celebrated a civil partnership?

N/A

e) What actions are to/ or will be taken to avoid any negative impact or to better advance equality?

N/A

f) Provide details of any mitigation.

N/A

g) How will any mitigation measures be monitored?

N/A

4.6 Pregnancy and maternity: Testing of disproportionate, negative, neutral or positive impact.

a) How is this protected characteristic target group reflected in the County/District/Borough?

We do not consider pregnancy and maternity characteristics to be relevant to the proposal.

b) How is this protected characteristic reflected in the population of those impacted by the proposal, project or service?

N/A

- c) **Will people with the protected characteristic be more affected by the proposal, project or service than those in the general population who do not share that protected characteristic?**

N/A

- d) **What is the proposal, project or service's impact on pregnant women and women within the first 26 weeks of maternity leave?**

N/A

- e) **What actions are to/ or will be taken to avoid any negative impact or to better advance equality?**

N/A

- f) **Provide details of the mitigation**

N/A

- g) **How will any mitigation measures be monitored?**

N/A

4.7 Religion, Belief: Testing of disproportionate, negative, neutral or positive impact.

- a) **How is this protected characteristic reflected in the County/District/Borough?**

Rodmell CE Primary School is a Voluntary Aided school. The following denominational schools are situated within the Lewes area.

Iford & Kingston CE Primary School
Southover CE Primary School, Lewes
South Malling CE Primary School, Lewes
St Pancras Catholic Primary School, Lewes
Annecy Catholic Primary School, Seaford

- b) **How is this protected characteristic reflected in the population of those impacted by the proposal, project or service?**

Rodmell CE Primary School is a Voluntary Aided school but is also a local community school and therefore accepts pupils of all faiths or no faith.

- c) **Will people with the protected characteristic be more affected by the proposal, project or service than those in the general population who do not share that protected characteristic?**

The proposal will predominantly affect children whose families have chosen to send their children to a denominational school.

- d) **What is the proposal, project or service's impact on the people with different religions and beliefs?**

Considering the fact that the school is a Voluntary Aided school families who have chosen to send their children to a denominational school will be disproportionately affected by the proposal.

e) What actions are to/ or will be taken to avoid any negative impact or to better advance equality?

The school will continue to provide education and support to all children at the school.

f) Provide details of any mitigation.

The local authority will work with the school to ensure that the school and the local community are kept well informed about the progress of the consultation process, including providing information about any new proposal submitted and the timelines for any further stage of consultation.

g) How will any mitigation measures be monitored?

The Local Authority will continue to work closely with the school to regularly monitor the progress and outcomes of pupils during this time of uncertainty.

4.8 Sexual Orientation - Gay, Lesbian, Bisexual and Heterosexual: Testing of disproportionate, negative, neutral or positive impact.

a) How is this protected characteristic reflected in the County/District/Borough?

We do not consider sexual orientation characteristics to be relevant to the proposal.

b) How is this protected characteristic reflected in the population of those impacted by the proposal, project or service?

N/A

c) Will people with the protected characteristic be more affected by the proposal, project or service than those in the general population who do not share that protected characteristic?

N/A

d) What is the proposal, project or service's impact on people with differing sexual orientation?

N/A

e) What actions are to/ or will be taken to avoid any negative impact or to better advance equality?

N/A

f) Provide details of the mitigation

N/A

g) How will any mitigation measures be monitored?

N/A

4.9 Other: Additional groups/factors that may experience impacts - testing of disproportionate, negative, neutral or positive impact.

a) How are these groups/factors reflected in the County/District/Borough?

As at the January 2015 School Census, 24.2% of all pupils in East Sussex maintained schools are Ever6FSM. A pupil who is described as 'Ever6FSM' means that within the last 6 years the pupil has at some point been eligible for Free School Meals (FSM).

b) How is this group/factor reflected in the population of those impacted by the proposal, project or service?

28.0% of Rodmell CE Primary School pupils are Ever6FSM. The data therefore indicates that there is an overrepresentation of Ever6FSM pupils at Rodmell CE Primary School.

c) Will people within these groups or affected by these factors be more affected by the proposal, project or service than those in the general population who are not in those groups or affected by these factors?

Children from poorer socio economic backgrounds will be disproportionately affected.

d) What is the proposal, project or service's impact on the factor or identified group?

Considering the data children who are EverFSM will be disproportionately affected by the proposal.

e) What actions are to/ or will be taken to avoid any negative impact or to better advance equality?

The school will continue to provide education and support to all children at the school. All schools have a duty to ensure appropriate provision for pupils who are EverFSM and schools receive specific funding (the pupil premium) to support these pupils.

f) Provide details of the mitigation.

The local authority will work with the school to ensure that the school and the local community are kept well informed about the progress of the consultation process, including providing information about any new proposal submitted and the timelines for any further stage of consultation.

g) How will any mitigation measures be monitored?

The Local Authority will continue to work closely with the school to regularly monitor the progress and outcomes of pupils during this time of uncertainty.

All schools have to report on the outcomes of all pupils, including those who are EverFSM. The local authority will continue to monitor the outcomes at all schools for these pupils.

4.10 Human rights - Human rights place all public authorities – under an obligation to treat you with fairness, equality, dignity, respect and autonomy. **Please look at the table below to consider if your proposal, project or service may potentially interfere with a human right.**

Articles	
A2	Right to life (e.g. pain relief, suicide prevention)
A3	Prohibition of torture, inhuman or degrading treatment (service users unable to consent, dignity of living circumstances)
A4	Prohibition of slavery and forced labour (e.g. safeguarding vulnerable adults)
A5	Right to liberty and security (financial abuse)
A6 & 7	Rights to a fair trial; and no punishment without law (e.g. staff tribunals)
A8	Right to respect for private and family life, home and correspondence (e.g. confidentiality, access to family)
A9	Freedom of thought, conscience and religion (e.g. sacred space, culturally appropriate approaches)
A10	Freedom of expression (whistle-blowing policies)
A11	Freedom of assembly and association (e.g. recognition of trade unions)
A12	Right to marry and found a family (e.g. fertility, pregnancy)
Protocols	
P1.A1	Protection of property (service users property/belongings)
P1.A2	Right to education (e.g. access to learning, accessible information)
P1.A3	Right to free elections (Elected Members)

Part 5 – Conclusions and recommendations for decision makers

5.1 Summarise how this proposal/policy/strategy will show due regard for the three aims of the general duty across all the protected characteristics and ESCC additional groups.

- Eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Equality Act 2010;
- Advance equality of opportunity between people from different groups
- Foster good relations between people from different groups

5.2 Impact assessment outcome Based on the analysis of the impact in part four mark below ('X') with a summary of your recommendation.

X	Outcome of impact assessment	Please explain your answer fully.
	A No major change – Your analysis demonstrates that the policy/strategy is robust and the evidence shows no potential for discrimination and that you have taken all appropriate opportunities to advance equality and foster good relations between groups.	<p>The recommendation to halt the closure of Rodmell CE Primary School may have a potential negative impact on children, including those with SEN and those who are Ever6FSM, and boys, who are over-represented in this cohort as a result of there being a period of uncertainty about the future of the school.</p> <p>This will be mitigated by the school continuing to provide education and support to the children; and through the local authority working closely with the school to ensure that the school and local community are kept well informed about the process.</p>
X	B Adjust the policy/strategy – This involves taking steps to remove barriers or to better advance equality. It can mean introducing measures to mitigate the potential effect.	
	C Continue the policy/strategy - This means adopting your proposals, despite any adverse effect or missed opportunities to advance equality, provided you have satisfied yourself that it does not unlawfully discriminate	
	D Stop and remove the policy/strategy – If there are adverse effects that are not justified and cannot be mitigated, you will want to consider stopping the policy/strategy altogether. If a policy/strategy shows unlawful discrimination it <i>must</i> be removed or changed.	

5.3 What equality monitoring, evaluation, review systems have been set up to carry out regular checks on the effects of the proposal, project or service?

(Give details)

The Local Authority has a clear schedule for regular monitoring of schools and the outcomes achieved by all pupils, including outcomes for those with SEN and Ever6FSM, and boys.

5.6 When will the amended proposal, proposal, project or service be reviewed?

In Term 5, 2017 following the submission of any proposals to the local authority and before a final decision is made.

Date completed:	June 2016	Signed by (person completing)	Gary Langford
		Role of person completing	Place Planning Manager
Date:	June 2016	Signed by (Manager)	Jessica Stubbings

Part 6 – Equality impact assessment action plan

If this will be filled in at a later date when proposals have been decided please tick here and fill in the summary report.

The table below should be completed using the information from the equality impact assessment to produce an action plan for the implementation of the proposals to:

- 1. Lower the negative impact, and/or
- 2. Ensure that the negative impact is legal under anti-discriminatory law, and/or
- 3. Provide an opportunity to promote equality, equal opportunity and improve relations within equality target groups, i.e. increase the positive impact
- 4. If no actions fill in separate summary sheet.

Please ensure that you update your service/business plan within the equality objectives/targets and actions identified below:

Page 77	Area for improvement	Changes proposed	Lead Manager	Timescale	Resource implications	Where incorporated/flagged? (e.g. business plan/strategic plan/steering group/DMT)

6.1 Accepted Risk

From your analysis please identify any risks not addressed giving reasons and how this has been highlighted within your Directorate:

Area of Risk	Type of Risk? (Legal, Moral, Financial)	Can this be addressed at a later date? (e.g. next financial year/through a business case)	Where flagged? (e.g. business plan/strategic plan/steering group/DMT)	Lead Manager	Date resolved (if applicable)

Appendix E

SCRUTINY REVIEW BOARD COMMENTS TO CABINET

Rodmell Church of England Primary School and Pells Church of England Primary School Review Board – 4 July 2016.

Membership of the Review Board:

Councillors Kathryn Field (Chair), Stephen Shing, Peter Charlton, Kim Forward, Roy Galley, Alan Shuttleworth and Francis Whetstone and representing the Church of England Diocese, Dr Ann Holt.

Review Board Comments for inclusion in report to Cabinet.

No.	Comment	Response
1	Rodmell Church of England Primary School.	The majority of the Review Board members agreed that it would be appropriate to defer the proposed closure of Rodmell Church of England Primary School for a year whilst the Governing Body and School Leadership team rigorously explore the option for partnership working.
2	Pells Church of England Primary School.	<p>Having listened to the evidence put before them, the Review Board were evenly split in their views on the emerging plan for Pells CE Primary School. Four of the eight Members of the Board accepted the Council's position that there is sufficient evidence to support the view that the school should be closed.</p> <p>However, four Members were concerned as to whether there would be a sufficient number of school places available in Lewes should the Pells CE Primary School close. In reaching this view, these Board Members were concerned whether the Council's forecast for future demand for school places might not be accurate, especially taking into account the impact of proposed developments in the area.</p> <p>Some Members of the Board expressed the view that there was merit in exploring the 'Farm School' option. The Board agreed that if the school were to stay open, further significant work would need to be done on changing the perception amongst local people of the school, so that it could attract more preferences from local families.</p>

No.	Comment	Response
3	General comment relating to both proposals.	The Review Board agreed that these proposals needed sensitive handling by the Council and that clear reasoning should be provided to the public explaining the reasons for any decisions taken regarding the futures of both schools. This would be especially important if Cabinet made different decisions about the futures of these two schools.

Report to: Cabinet

Date of meeting: 19 July 2016

By: Director of Children's Services

Title: Proposed closure of Pells CE Primary School

Purpose: To consider the outcome of the public consultation in relation to the proposed closure of Pells CE Primary School and to seek approval to publish statutory notices to formally close the school with effect from 31 August 2017

RECOMMENDATIONS

Cabinet is recommended to approve the publication of statutory notices to close Pells CE Primary School by 31 August 2017.

1 Background

1.1 In October 2014 the Lead Member agreed that a review of primary schools should be undertaken in the Lewes area. This was in the context of the Council's principles for planning the provision of education places in East Sussex as set out in the *Education Commissioning Plan 2014 – 2018* and the Council's strategy for school improvement *Excellence for All*. The Local Authority has a duty to ensure there is sufficient provision to meet the predicted demand for places and to also look more widely at the organisation of schools to make sure they are well placed to deliver a high quality education to their local communities.

1.2 The Area Review raised significant concerns about the long term sustainability of Pells CE Primary School in terms of the risks to its financial stability, securing good outcomes for pupils and its ability to attract pupils from within its community area. For these reasons and having considered alternative options including federation, amalgamation and academisation, approval was sought from the Lead Member for Education and Inclusion, Special Educational Needs and Disability on 21 March 2016 to consult on a proposal to close Pells CE Primary School. The Lead Member agreed that the Children's Services Department (CSD) should consult on the closure of the school but instructed CSD to fully consider any proposals coming from the schools or from other consultees around federation or amalgamation which would lead to a sustainable solution.

1.3 The Diocese of Chichester shares the Council's concerns and agreed that the Local Authority should consult on closure of the school.

1.4 The consultation period commenced on 15 April 2016 and ran until 27 May 2016. A report on the consultation and the responses received is provided in **Appendix A**. Members must read and have regard to the full version of the consultation report with responses.

2 Supporting information

2.1 Pupil Numbers

2.1.1 Births in Lewes between 2003/04 (reception year intake 2008/09) and 2012/13 (reception year intake 2017/18) have fluctuated from a low of 156 in 2005/06 to a high of 201 in 2009/10. Since then, there has been a marked fall in the birth rate with numbers in 2013/14 (reception year intake 2018/19) at 137 and 2014/15 (reception year intake 2019/20) at 134.

2.1.2 Pells CE Primary School has suffered from very low parental preferences for many years as illustrated in the table below. Even at times of high demand for places in the town the school has been unpopular and unable to attract sufficient pupils.

	2012/13		2013/14		2014/15		2015/16		2016/17	
Published Admission Number (PAN)	1st Prefs	% 1st Prefs Above/ Below PAN	1st Prefs	% 1st Prefs Above/ Below PAN	1st Prefs	% 1st Prefs Above/ Below PAN	1st Prefs	% 1st Prefs Above/ Below PAN	1st Prefs	% 1st Prefs Above/ Below PAN
20	7	-65%	6	-70%	9	-55%	11	-45%	9	-55%

2.1.3 For 2016/17 only nine first preferences were received by the closing date for applications. This number reduced to four after parents were given the opportunity to re-submit their preferences. A late application was received for Pells so the school is likely to start September with five children in its reception year.

2.1.4 In the period 2001/02 to 2003/04 pupil numbers at the school were close to its capacity of 140. Over the last twelve years numbers have been on a downward trend – in the period 2004/05 to 2009/10 numbers were generally between 110 and 120 each year. Since 2010/11 numbers have been less than 100 and as low as 83 in 2013/14.

2.1.5 Over the last five academic years the percentage of primary age children living on the Landport Estate attending Pells CE Primary School has fallen from 34% (70 pupils) in January 2012 to only 23% (51 pupils) in January 2016. In contrast the percentage of children living on the Landport Estate attending other schools in Lewes has risen from 62% (127 pupils) in January 2012 to 74% (164 pupils) in January 2016.

2.1.6 The take up of reception year places from those who have attend the early years provider on site (Pippa's Group) is low and declining:

2012/13 - 4 out of 8 children (50%)

2013/14 - 5 out of 8 children (63%)

2014/15 - 8 out of 12 children (67%)

2015/16 - 6 out of 13 children (46%)

2.1.7 The latest set of pupil forecasts for Lewes, which take account of the proposed developments at North Street and Old Malling Farm indicate that primary reception year intakes will fall in the period to 2018/19 before rising again in the period to 2025/26. However even at its peak reception year intake numbers are expected to be below 200 in the town. Beyond 2025/26 the Council's demographic based forecasts indicate that reception year intakes will decline. This means that 200 reception year places in Lewes (assuming Pells CE Primary School closes in August 2017) will be sufficient to meet future demand for places. **Appendix B** sets out the Council's forecasting methodology and predictions for the Lewes area.

2.1.8 The Council's pupil forecasts are highly accurate with an accuracy of +0.5 to +0.1% over the last four years. The pupil forecasts take account of both the impact of new housing on future births, and the impact of school aged children moving into new housing. The Council has recently reviewed its pupil yield factors to check accuracy. The review indicated that that the Council's pupil yield produced marginally higher pupil yields than other models. The Council has therefore continued to use this model to ensure there is sufficient capacity without overprovision. The most recent example of the use of this forecasting model shows that the housing development in Hailsham produced less pupils than the Council's model estimated. Further detail on this is provided in **Appendix B**. There is no evidence to suggest that the pupil forecasts for Lewes are inaccurate, on experience to date the forecasts will identify more pupils than will actually result from the new housing.

2.1.8 There will be sufficient places available in other schools in Lewes in 2017/18 for children from Pells CE Primary School were it to close. There will be a very small pressure in Years 3 and 4 and this would be addressed through working with the other schools in the town. The Lewes Co-operative Trust has already indicated willingness for schools to exceed PAN if necessary to ensure every child has a place. In the highly unlikely event that there is a short term additional demand for places there is capacity at other schools in the town to provide one off bulge classes if required.

2.1.9 Asking schools to exceed PAN is a strategy adopted across the county where there is pressure on places but the level of demand does not justify the creation of bulge classes. Our forecasts indicate that this strategy would only need to be in place for a very short period of time until the larger cohorts in Years 3 and 4 leave the primary phase. It should be noted that there is no class size legislation in Key Stage 2 which limits class sizes to 30 pupils.

2.2 Leadership Capacity

2.2.1 Since January 2016 interim leadership arrangements have been in place and will continue until the end of the academic year. Recruiting headteachers in all schools, but particularly small schools is very challenging, both locally and nationally. The school will face an additional challenge in this respect as it is an underperforming school and it will have another Ofsted inspection within the next year. Recruitment activity across the county indicates that it will be very difficult, if not impossible, for Pells CE Primary to recruit to a headteacher vacancy.

2.2.2 There is no permanent leadership solution for the school. The interim leadership being provided by the Council and the Lewes Co-operative Learning Trust is in place until the end of this academic year. The interim leadership arrangements are not financially sustainable from the school's budget; the Council is currently funding these arrangements. The Lewes Co-operative Learning Trust has confirmed that they do not have the capacity to sustain longer term leadership for the school. If the decision is reached that the school will close the Trust would be prepared to provide further interim leadership, in the interests of the children at the school, during the period of closure. However these arrangements will not be available should the decision be made to keep the school open as this would require a different plan and increased leadership capacity to take the school through very challenging circumstances.

2.3 Performance

2.3.1 In September 2009 the school was judged to require 'Special Measures'. In January 2012 the school was removed from special measures due to improved leadership but with an inadequate judgement on outcomes and given a notice to improve. In February 2013 and February 2015 Ofsted judged the school to 'Requires Improvement'. The 2 year period for the school's journey to good ends in February 2017 and the in-year data suggests that outcomes will remain low this year with insufficient improvement in both progress and outcomes to lift the school successfully beyond a requires improvement judgement. The recently received provisional outcomes data for key stage 2 for this year shows that only 33% (4 out of 12 pupils) achieved the expected standard in reading, writing, maths combined, significantly below the East Sussex average of 51.1%. All of this means that it is very unlikely that the school will be judged good at the next inspection. As the school has been judged 'Requires Improvement' twice in a row, it is very likely that Ofsted will place the school in a category of concern as the pace of improvement has not been swift enough over a number of years to address significant pupil underachievement.

2.3.2 The school has received significant support from the Council and the Diocese but despite this the school continues to face challenges in achieving an Ofsted judgement as a good school. This has been confirmed by the interim leadership who have identified significant areas of underperformance. Council monitoring arrangements confirm this view noting that many targets remain unmet or only partially met, and the recent key stage 2 results for this year provide further evidence that the school is underperforming. Despite the considerable efforts of the school, the Council and the Diocese it has not been possible to break the long term cycle of underperformance.

2.3.3 The Council has a duty to ensure all pupils receive a good standard of education. It is a matter of serious concern that the provision for the pupils at Pells CE Primary School does not enable them to make expected levels of progress by the time they leave Year 6. Children who start at a similar level in other schools make better progress. The attainment of pupils in Year 6 has been significantly below the national average in three of the last four years, and is significantly below again this year. Pells CE Primary School is not delivering the level of ambition that we have for the children of this county.

2.4 Petition

2.4.1 During the consultation period a 5,000+ signature petition in relation to the proposed closures of both Rodmell CE Primary School and Pells CE Primary was submitted to the Local Authority. The petition is available for members to view.

2.4.2 The petition was presented at Full Council on 10 May 2016 where the following motion was moved.

In view of the increasing need for Primary School places in and around Lewes in the next five years, the strength of public feeling shown by a petition of over 5,000 signatories and the emerging plans for the future at both Rodmell School and Pells School, the Council recommends to Cabinet that the process towards the closure of these two schools is halted at the end of the consultation to enable these plans to be put into place.

2.4.3 A recorded vote on the motion was requested and taken. The motion was carried, the votes being cast as follows - 28 for the motion and 20 against the motion. In accordance with the Lead Member decision and the resolution of the Council we have sought to look at possible alternative options and to engage with stakeholders to consider any emerging plans that are put forward.

2.5 Alternative options

2.5.1 The Council has been actively promoting federation with schools since November 2014 and has, along with the Diocese, spent a considerable amount of time exploring options for Pells CE Primary School. No Academy Trust has expressed an interest in taking the school into their Trust; the long term underperformance, low parental preferences and low pupil numbers means that it is very unlikely to be attractive to an Academy Trust.

2.5.2 Whilst the Lewes Co-operative Learning Trust have a commitment to improve the outcomes of all pupils in the town and is providing interim leadership, the Trust and other schools are not willing to federate or amalgamate with Pells CE Primary School. It is unlikely that federation would improve the popularity of the school anyway. No other school has room to accommodate all the pupils from Pells CE Primary School on their own site – a split site school has been considered but would create difficult challenges for the school and parents to manage, and in any event, no school has shown an appetite for that model.

2.5.3 The Council has a role in supporting schools to explore federation but it is not responsible for securing those partnerships. Federation is a decision made by the governing bodies of schools and the local authority can only direct governing bodies to federate in exceptional circumstances i.e. when it has been identified as causing concern and is eligible for formal action.

2.5.4 The Council did not receive any proposals for the future of the school during the consultation process and no firm proposals were shared with the school leadership or governing body. On 23 May 2016 the Chair of Governors confirmed in a telephone conversation with the Assistant Director: Education and ISEND that the governing body were not bringing forward a solution and that no groups had discussed any potential solutions with her regarding the future of the school.

2.5.5 Following a meeting between the Director of Children's Services, the Assistant Director: Education and ISEND and Councillor Ruth O'Keeffe on Friday 24 June 2016, a proposal was submitted on 29 June 2016 by Councillor O'Keeffe for a 'Farm School Approach' for Pells CE Primary School. This proposal was not shared with the school during the consultation period but has since been sent to the Chair of Governors. As requested by the Lead Member this proposal has been fully evaluated by officers who have assessed that the proposal does not address the key challenges that the school faces, it has not been costed by the proposer and will not lead to the rapid improvement required at the school. The proposal and evaluation are provided in **Appendix C**. The Chair of Governors has reviewed the plan and does not feel that it offers a sustainable way forward for the school in light of the significant challenges the school is facing.

2.5.6 The proposal has been costed by officers and is found to be unaffordable. The Farm school would cost at least £100K to set up, and cost £50K each year to cover running costs.

In addition setting up a Farm School would require planning permission for change of use and constructing any necessary buildings. This process would take at least 6 months and would cost in the region of £20K. Any loss of playing field space would also require Secretary of State permission. The proposal does not offer a financially viable solution for the school.

2.5.7 Though much has been made of the local community support for the school, this is not supported by the data in 2.1.5 which show that the majority of families living on the Landport Estate, have not chosen, and do not choose to send their children to the school, and that the popularity of the school continues to decline. There is no evidence that the Farm School proposal would increase the popularity of the school.

2.5.8 The imminent Ofsted inspection, which in light of the key stage 2 results this year we would now expect early next academic year, is likely to judge the school to be inadequate and this does not allow time for any further exploration of options for this school.

2.6 Equality Impact Assessment

2.6.1 Members are required to have 'due regard' to the duties set out in Section 149 of the Equality Act 2010 ('the PSED') in determining this proposal. An Equality Impact Assessment (EqIA) has been prepared in order to analyse the equality implications of this proposal and to identify any appropriate mitigations. The EqIA is appended to the Consultation Report. Members must read the EqIA and take its findings into consideration when determining these proposals.

2.7 Scrutiny Committee

2.7.1 At the recommendation of CMT, Scrutiny Committee considered the report on Pells CE Primary School at an additional meeting on Monday 4 July 2016. A summary of the Committee's discussion and responses to the proposal is included in **Appendix E**.

3. **Conclusion and reasons for recommendations**

3.1 In conclusion, parents and pupils, staff, the governing body and the local community are generally against the proposed closure of the school, although a small number of respondents understand the reasons for the Council proposing closure.

3.2 At Full Council it was resolved that the process for closure be halted while emerging plans are put in place. However, the Council remains extremely concerned about this vulnerable school, does not believe that a viable option to closure has been presented and that children will achieve better outcomes if they attend other schools.

3.2 For the reasons set out in this report Cabinet is recommended to:

Approve the publication of statutory notices to close Pells CE Primary School by 31 August 2017.

3.3 Notices would be published in the local newspaper, on the Council website and posted on the gates of the school in August 2016. Publication would trigger a four week period of representation when interested parties have another opportunity to comment on or object to the proposals. Cabinet would be required to make a final decision on the proposal with two months of the end of the representation period, most likely in November 2016.

STUART GALLIMORE
Director of Children's Services

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LOCAL MEMBERS

Councillor Ruth O'Keeffe

APPENDICES

Appendix A	Consultation Report
Appendix B	Pupil Forecasting and School Places
Appendix C	Proposal and Evaluation
Appendix D	Equality Impact Assessment
Appendix E	Summary of Scrutiny Committee

BACKGROUND DOCUMENTS

Lead Member Report and Minute of 21 March 2016

CONSULTATION REPORT

on the

Proposal to close Pells CE Primary School

June 2016

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1. Introduction

- 1.1 On the 21 March 2016 the Lead Member for Education and Inclusion, Special Educational Needs and Disability gave approval to formally consult with key stakeholders on the proposed closure of Pells CE Primary School.
- 1.2 The proposed changes to the organisation of schools have to follow a prescribed process established by the Education and Inspections Act 2006 (EIA 2006) as updated by the Education Act 2011 and the School Organisation (Establishment and Discontinuance of Schools) (England) Regulations 2013.
- 1.3 This process complied with these requirements.

2. The Consultation

- 2.1 A six week public consultation on the proposed closure of Pells CE Primary School commenced on 15 April and ran until 27 May 2016. Hard copies of the Council's consultation document were distributed to approximately 920 key stakeholders and interested parties. Table 1 below provides a list of consultees. The consultation document was also made available on the Council's website.

Table 1

Organisation	Number of Copies
Pells CE Primary School	151
Hamsey Primary School	15
Iford & Kingston CE Primary School	15
St Pancras Catholic Primary School	15
Southover CE Primary School	15
South Malling CE Primary School	15
Rodmell CE Primary Primary	15
Wallands Community Primary School	15
Western Road Community Primary School	15
Priory School	15
Sussex Downs College	1
Maria Caulfield MP	1
Lewes District Council	45
Lewes Town Council	20
Diocese of Chichester	1
Diocese of Arundel and Brighton Catholic Schools Service	1
Riverlodge Surgery	20
School Hill Medical Practice	20
St Andrew's Surgery	20
Anchor Field Surgery	20
Mid Downs Medical Practice	20
Sussex Voluntary and Community Learning Consortium	10
Lewes Library	20
Lewes Children's Centre	20
Pippa's Group	20
Lewes New School	20
Lewes Old Grammar School (nursery)	20
Kingston Pre-school Group	20
Lewes Clock Tower Nursery	20
Honey Bees Playgroup	20
Mohair Centre Holiday Playscheme And Nursery	20
Newick Pre-school Playgroup	20
Cottage Pre-school Group	20
Barcombe Playgroup	20
Busy Bees Day Nursery At Lewes	20
South Malling Nursery School	20
South Malling Pre-School	20

Organisation	Number of Copies
Southover Nursery School	20
The Old School House Montessori Nursery	20
Toddlers Inn Ltd	20
Stepping Stones Lewes Community Nursery Ltd	20
Ymca Steps Nursery	20
ESCC Councillors	48
Trade Unions	7
TOTAL	920

- 2.2 The consultation document included a response form to assist and encourage people to give their views. Interested parties could provide a response to the consultation by returning the response form attached to the consultation document, by completing it online, by letter or by email.
- 2.3 An Equality Impact Assessment (EqIA) has been prepared for the proposal.

3. Consultation Events

- 3.1 A meeting was held with school staff and their union representatives on 21 April 2016 to provide the opportunity for officers to provide more detail about the proposal and for those attending to ask questions and raise concerns. A Question and Answer (Q&A) document was produced after the meeting and emailed to the headteacher to circulate to all staff.
- 3.2 A public meeting was held at Pells CE Primary School on the 4 May 2016 to provide more detail about the proposal and enable parents, carers and all interested parties to ask questions and raise concerns. Notes were taken at this meeting and a Q&A document responding to the key issues raised was produced and posted on the Council's website for people to view. This can be viewed in section 5 of this report.
- 3.3 The children of Pells CE Primary School were encouraged to express their views. These were gathered by the Head of School and submitted by email. The overall view expressed by the children was that they liked their school and it should not close just because it was a small school. The pupils particularly highlighted that they would be sad to be split up from their friends and would miss their teachers; however some commented that it might be exciting to make new friends. The feedback received from pupils can be viewed in Section 6 of this report.

4. Consultation Responses

- 4.1 All written responses received during the consultation will be provided to Cabinet for consideration ahead of the meeting on 19 July. A summary of responses, grouped by key theme is provided at Section 7.

In total:

- 104 consultation responses were received during the consultation period of which 43 were completed on line and 61 forms were returned via freepost
 - 1 letter was received
 - 4 emails were received.
- 4.2 Where known the following stakeholders responded to the consultation
- 22 parents / carers of a child at Pells CE Primary School
 - 3 pupils at Pells CE Primary School
 - 4 members of staff at Pells CE Primary School

- 5 members of the governing body at Pells CE Primary School
- 46 members of the local community
- 23 other (Home educating parent, parents of children at local schools, teacher at local school, governor at a local school, retired teachers, local town and district councillor, local MP, local town and district councillor, parent of past pupil, prospective parent, Grandparent, local resident and past resident of Lewes, local business, 'just wanting to save our schools')
- 1 Not answered

5. PUBLIC CONSULTATION MEETING, 4 MAY 2016

QUESTION AND ANSWER DOCUMENT produced following the meeting

Q: In light of the government white paper and the desire for every school to become an academy it would appear that we are too small to be an academy - is this really a consultation process or is it a done deal?

A: This is a genuine consultation and we want to hear the views from parents, pupils, staff, the local community and other stakeholders. The Lead Member attended the public consultation meeting to hear and listen to all the views, comments and discussions. He will take account of all responses received during the consultation period before a final decision is made.

Q: Is this proposal merely about saving money?

A: The Local Authority does not save any money by closing the school – Local Authority funds are separate to school funding. But school funds are public money and we have a responsibility to ensure efficient use of school funding; inefficient use impacts on all schools and children in the county. The government is also making changes to the national funding formula which will mean schools will face additional challenges in the future.

Q: Why is the headteacher post being covered by interim leadership arrangements and not being advertised?

A: Interim leadership arrangements are in place until the end of the academic year. We believe it will be difficult for the school to recruit to a headteacher post; at the start of the last academic year there were many schools across the county without a permanent headteacher. Our normal procedure when going through a process like this would not be to bring in a permanent headteacher until a final decision is taken on the proposal in case that decision should be to close the school.

Q: Could vacant teaching posts be advertised as temporary or fixed term to avoid the use of supply teachers during this time?

A: Yes, they can.

Q: Where do you get your forecast statistics from? The Office for National Statistics (ONS) have predicted great rises for school places up to 2022. The birth rate figures you predict do not match up and you are not taking into account housing developments and you should also be considering people moving into Lewes with families. Should children that attend Lewes schools only be children that are born in Lewes?

A: The Local Authority uses ONS and health authority data, GP registrations, early years nursery take up and information on housing developments to inform their pupil forecasts. The figures set out in the presentation show that the birth rate in Lewes has fallen in recent years from 195 in 2011/12 (reception intake year 2016/17) to 134 in 2014/15 (reception intake year 2019/20) – a fall of 61 births per year over a 3 year period.

In certain parts of the County, for example Hailsham, we will see a significant number of school places required in the future due to the volume of housing developments planned there. We believe that the falling birth rate in Lewes will lead to sufficient places being available in the town even taking into account planned housing development at North Street and Mallong Farm.

One of the challenges is that the Admissions Code requires Local Authorities to meet parental preference where possible. Pells is not always the first preference school for local parents, significant numbers of whom have opted to make use of other schools in the town over the last five years rather than send their children to Pells.

Q: Assuming your figures are correct what would the class sizes be like in four or five years' time in Lewes? Do you acknowledge that class sizes in Lewes will go over 30? Twelve pupils have already left the school and at least 2 of those families have been split up. What will happen when all other pupils need to be moved? If Landport does not have a school all children will have to go to other schools and there is not a safe crossing route.

The children already leaving the school are having an unsettling effect on children and staff remaining at the school. Can we stop children from leaving the school?

A: We believe in general there will be sufficient places available in 2017/18 across the town to accommodate children displaced from Pells were it to close. Year 3 in 2017/18 (the current year 1) is likely to see a shortfall of places but schools within the Lewes Co-operative Trust have indicated a willingness to exceed their published admission number (PAN) if needed to accommodate all pupils from Pells.

Class size legislation prohibits classes of more than 30 in Key Stage 1 unless supported by an additional teacher. Class size legislation does not exist in Key Stage 2 and schools are therefore able to exceed 30 in a class if required. This may be the case in Year 3 in 2017/18.

We appreciate the challenge that is created by children leaving the school. It should be remembered that Pells remains open and there is no need for parents to move their children to other schools at this stage. However, if parents choose to move their children to a school with space that is their right under the admissions code. We will work with the leadership team to support the school through this challenging time. If a decision is taken to close we have a duty to ensure every child has a place at an alternative school and admissions would look at each case on an individual basis. Where eligible we would support with transport costs taking into account distance and routes to school.

Q: Where will you put the SEN children and what transition will be available for them? You won't find other schools in Lewes that will take those children. People have said that they choose this school because it is a small school. It seems to me that in this world there is a bias against small schools when we know that small schools work well for some children. If some children are attending this school with SEN their outcomes in this school won't be good. You won't find other schools in Lewes that will take those SEN children.

A: Pells is a mainstream school like other schools in Lewes. All mainstream schools support and accommodate pupils with SEN. Children attending other mainstream schools in Lewes have access to a range of support to help with their needs and this would be the case for children moving from Pells. Outcomes for children with similar needs are good in other schools.

Q: The LA has set out its responsibilities to provide sufficient places and to promote excellence. Is this solely in relation to academic achievement? This school has a high number of SEN pupils. If achieving excellence is about leaving school with good manners, confidence, high self-esteem, then this school achieves that.

A: Determining achievement and attainment does not only look at raw scores and how many pupils' reach level 4 at the end of Key Stage 2. It also considers progress made and there is a measure called expected progress. What we can unfortunately see is that the children here do not make expected levels of progress by the time they leave year 6. Children who start at a similar level in other schools make better progress and we have a responsibility to ensure that we have the same ambition for children at Pells.

Q: You said the LA had looked at all of the options. There is a high proportion of parents looking for the option of flexi schooling. Would the LA consider Pells as an option to become a flexi-school?

A: The Local Authority and the Diocese have explored other options including partnerships and federation – no schools in the area have expressed a willingness to federate or amalgamate with Pells and no academy solutions have been put forward. If you believe there are alternative options please put forward your proposals including detailed information about the educational and business benefits including its long term sustainability. These will be considered by the Lead Member alongside all other responses from the consultation.

The option of flexi schooling is something that an individual headteacher can look at based on a number of factors. Ultimately the final decision rests with the headteacher.

Q: Are the responses to the consultation going to be available before the Lead Member decision is made? Can consultation responses be made available to view during the course of the consultation? People may gain confidence to respond by viewing what other people say.

A: We have received advice that in order to publish responses before the consultation period ends we would need to ask respondent's for their consent. Although it may encourage people to respond it could also potentially discourage others from participating.

The Lead Member report is published 10 days before the meeting takes place and the report will provide an analysis of all the responses received.

Q: What would happen to the site if the school closes?

A: The Diocese has not considered what would happen to the land at this stage other than to begin looking at Trust documents to check on any restrictions on future use. This is a very complicated process. The Diocese refrains from any consideration of possible use at this stage so as not to pre-empt in any way the outcomes of the consultation.

If the school site was sold, the proceeds would go into an education foundation account to be invested and used for Education purposes in the Diocese and it would be for the trustees to decide whether the money would be reinvested in the local area to support children who have been displaced from Pells. Any reinvestment would have to be in church school provision.

Comments made by parents about their specific situations and experience

- I sent my kids to another local school, biggest mistake of my life. Let them become excellent in other forms than just academic, in art, writing, music.
- My son is starting here in September and my other children are here. Teachers saw me when pregnant, they see him now, he has his routine here.
- My son has been failed in a bigger school; he won't make progress in a bigger class. This school remembers my family and this is what this school does and what you have here is excellence. We are going possibly to bring other schools down. Please try and keep our family community going. At this school your child is not categorised as naughty because the teachers know you.

6. Response of Pell's Children

1. What do you like about your school?

- That there are not many children
- That we are pushed to our limits
- School dinners
- We get reward time
- There is lots of sport
- It is local to everyone
- It is small – we get lots of attention
- It is easy to make friends

2. What do you think about the school maybe closing?

- Sad because we will have to organise another school which will cause our parents hassle
- Annoying as we really like this school
- Sad because we will be split up from our friends
- Sad, angry and emotional because it is emotional to leave all your friends and you won't be able to play with them anymore
- Ridiculous – you might be split from your friends and siblings
- Annoying – we might start a new class in September then we might have to move schools

3. What would you miss about your school if it had to close next summer?

- The teachers and everybody
- Friends who you won't be able to see
- Work that you like
- Teachers and the education – people here know where you are
- Everything to do with the school
- Reward time

4. How would you feel about going to another school?

- Sad leaving friends
- Worried because you don't know what the people in the new school are going to be like
- Sad, nervous and excited – you could make new friends
- Sad leaving friends who might not go to the same school as you
- Not happy - we might get sent to a school we don't want
- Unhappy – you will have to get up earlier to go to a school further away
- If sibling go to different schools it will be really difficult
- We will leave all our happy memories behind
- Annoyed – we might get judged on how we look and act. People might not want to be our friend

5. Is there anything else you want to ask/ tell us about?

- There is nothing wrong with our school why might you close it down?
- Our friends are really important
- Just because its small, doesn't mean it has to close
- It's not good for children with special needs to have to change schools and teacher
- I like this school – I don't understand why it might shut down

7. KEY ISSUES RAISED BY RESPONDENTS

School Places

Consultee Comment	County Council Response																																	
<ul style="list-style-type: none">At a time when the population of Lewes is growing there is need for more school places, not fewer. The large number of primary age children from the North Street development has been seriously underestimated by the council.This would be the nearest primary school to serve more than 400 new homes proposed in North Street alone.Encourage more people to attend, don't run the school into the ground.	<p>A full response including the detail on the impact of closing the school on school places, and details of our pupil forecasting methodology and pupil yield for housing development is provided in Appendix B of the report to Cabinet.</p> <p>Parents are entitled to express a preference for a school for their child. It is the responsibility of the school, and the governing body, to ensure that the provision they make is attractive to parents.</p> <p>The Council acknowledges that statutory consultation around school organisation will cause a level of uncertainty which can be a contributory factor on pupil numbers at the school.</p> <p>Births in Lewes between 2003/04 (reception year intake 2008/09) and 2012/13 (reception year intake 2017/18) have fluctuated from a low of 156 in 2005/06 to a high of 201 in 2009/10. Since then, there has been a marked fall in the birth rate with numbers in 2013/14 (reception year intake 2018/19) at 137 and 2014/15 (reception year intake 2019/20) at 134.</p> <p>Pells CE Primary School has suffered from very low parental preferences for many years as illustrated in the table below. Even at times of high demand for places in the town the school has been unpopular and unable to attract sufficient pupils.</p> <table><tr><th></th><th colspan="2">2012/13</th><th colspan="2">2013/14</th><th colspan="2">2014/15</th><th colspan="2">2015/16</th><th colspan="2">2016/17</th></tr><tr><th>Published Admission Number (PAN)</th><th>1st Prefs</th><th>% 1st Prefs Above/ Below PAN</th><th>1st Prefs</th><th>% 1st Prefs Above/ Below PAN</th><th>1st Prefs</th><th>% 1st Prefs Above/ Below PAN</th><th>1st Prefs</th><th>% 1st Prefs Above/ Below PAN</th><th>1st Prefs</th><th>% 1st Prefs Above/ Below PAN</th></tr><tr><td>20</td><td>7</td><td>-65%</td><td>6</td><td>-70%</td><td>9</td><td>-55%</td><td>11</td><td>-45%</td><td>9</td><td>-55%</td></tr></table> <p>For 2016/17 only nine first preferences were received by the closing date for applications. This number reduced to four after parents were given the opportunity to re-submit their preferences. A late application was received for Pells so the school is likely to start September with five children in its reception year.</p> <p>In the period 2001/02 to 2003/04 pupil numbers at the school were close to its capacity of 140. Over the last twelve years numbers have been on a downward trend – in the period 2004/05 to 2009/10 numbers were generally between 110 and 120 each year. Since 2010/11 numbers have been less than 100 and as low as 83 in 2013/14.</p> <p>Over the last five academic years the percentage of primary age children living on the Landport Estate attending Pells CE Primary School has fallen from 34% (70 pupils) in January 2012 to only 23% (51 pupils) in January 2016. In contrast the percentage of children living on the Landport Estate attending other schools in Lewes has risen from 62% (127 pupils) in January 2012 to 74% (164 pupils) in January 2016.</p> <p>The take up of reception year places from those who have attended the early years provider on site (Pippa's Group) is low and declining:</p> <p>2012/13 - 4 out of 8 children (50%) 2013/14 - 5 out of 8 children (63%) 2014/15 - 8 out of 12 children (67%) 2015/16 - 6 out of 13 children (46%)</p> <p>The latest set of pupil forecasts for Lewes, which take account of the proposed large developments at North Street and Old Malling Farm indicate that primary reception year intakes will fall in the period to 2018/19 before rising again in the period to 2025/26. However even at its peak reception year intake numbers are expected to be below 200 in the town. Beyond 2025/26 the Council's demographic based forecasts</p>		2012/13		2013/14		2014/15		2015/16		2016/17		Published Admission Number (PAN)	1st Prefs	% 1st Prefs Above/ Below PAN	1st Prefs	% 1st Prefs Above/ Below PAN	1st Prefs	% 1st Prefs Above/ Below PAN	1st Prefs	% 1st Prefs Above/ Below PAN	1st Prefs	% 1st Prefs Above/ Below PAN	20	7	-65%	6	-70%	9	-55%	11	-45%	9	-55%
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	<p>indicate that reception year intakes will decline. This means that 200 reception year places in Lewes (assuming Pells CE Primary School closes in August 2017) will be sufficient to meet future demand for places. Appendix B sets out the Council's forecasting methodology and predictions for the Lewes area.</p> <p>The Council's pupil forecasts are highly accurate with an accuracy of +0.5 to +0.1% over the last four years. The pupil forecasts take account of both the impact of new housing on future births, and the impact of school aged children moving into new housing. The Council has recently reviewed its pupil yield factors to check accuracy. The review indicated that the Council's pupil yield produced marginally higher pupil yields than other models. The Council has therefore continued to use this model to ensure there is sufficient capacity without overprovision. The most recent example of the use of this forecasting model shows that the housing development in Hailsham produced less pupils than the Council's model estimated. Further detail on this is provided in Appendix B. There is no evidence to suggest that the pupil forecasts for Lewes are inaccurate, on experience to date the forecasts will identify more pupils than will actually result from the new housing.</p> <p>There will be sufficient places available in other schools in Lewes in 2017/18 for children from Pells CE Primary School were it to close. There will be a very small pressure in Years 3 and 4 and this would be addressed through working with the other schools in the town. The Lewes Co-operative Trust has already indicated willingness for schools to exceed PAN if necessary to ensure every child has a place.</p> <p>Asking schools to exceed PAN is a strategy adopted across the county where there is pressure on places but the level of demand does not justify the creation of bulge classes. Our forecasts indicate that this strategy would only need to be in place for a very short period of time until the larger cohorts in Years 3 and 4 leave the primary phase. It should be noted that there is no class size legislation in Key Stage 2 which limits class sizes to 30 pupils.</p>
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Ofsted Judgement

Consultee Comment	County Council Response
<ul style="list-style-type: none"> An Ofsted grade of 'requires improvement' is equivalent to the former grade of satisfactory: this means that there are many good aspects to the schools learning and teaching. How do you know it won't get good at its next inspection? The school could improve more with good support from the county council Please consider making changes/upgrading to better the future education of the children at Pells. There has been nothing done to help shake off the unjust stigma the school has suffered. 	<p>In September 2009 the school was judged to require 'Special Measures'. In January 2012 the school was removed from special measures due to improved leadership but with an inadequate judgement on outcomes and given a notice to improve. In February 2013 and February 2015 Ofsted judged the school to 'Requires Improvement'. The 2 year period for the school's journey to good ends in February 2017 and the in-year data suggests that outcomes will remain low this year with insufficient improvement in both progress and outcomes to lift the school successfully beyond a requires improvement judgement. The recently received provisional outcomes data for key stage 2 for this year shows that only 33% (4 out of 12 pupils) achieved the expected standard in reading, writing, maths combined, significantly below the East Sussex average of 51.1%. All of this means that it is very unlikely that the school will be judged good at the next inspection. As the school has been judged 'Requires Improvement' twice in a row, it is very likely that Ofsted will place the school in a category of concern as the pace of improvement has not been swift enough over a number of years to address significant pupil underachievement.</p> <p>The school has received significant support from the Council and the Diocese but despite this the school continues to face challenges in achieving an Ofsted judgement as a good school. This has been confirmed by the interim leadership who have identified significant areas of underperformance. Council monitoring arrangements confirm this view noting that many targets remain unmet or only partially met, and the recent key stage 2 results for this year provide further evidence that the school is underperforming. Despite the considerable efforts of the school, the Council and the Diocese it has not been possible to break the long term cycle of underperformance.</p>

<ul style="list-style-type: none"> Other local schools are in SM or RI – are you proposing to close them? 	<p>The Council has a duty to ensure all pupils receive a good standard of education. It is a matter of serious concern that the provision for the pupils at Pells CE Primary School does not enable them to make expected levels of progress by the time they leave Year 6. Children who start at a similar level in other schools make better progress. The attainment of pupils in Year 6 has been significantly below the national average in three of the last four years, and is significantly below again this year. Pells CE Primary School is not delivering the level of ambition that we have for the children of this county.</p>
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Headteacher Recruitment

Consultee Comment	County Council Response
<ul style="list-style-type: none"> Why is the headteacher post being covered by interim leadership arrangements and not being advertised? Try advertising for senior management don't just assume. 	<p>Since January 2016 interim leadership arrangements have been in place and will continue until the end of the academic year. Recruiting headteachers in all schools, but particularly small schools is very challenging, both locally and nationally. The school will face an additional challenge in this respect as it is an underperforming school and it will have another Ofsted inspection within the next year. Recruitment activity across the county indicates that it will be very difficult, if not impossible, for Pells CE Primary to recruit to a headteacher vacancy.</p> <p>There is no permanent leadership solution for the school. The interim leadership being provided by the Council and the Lewes Co-operative Learning Trust is in place until the end of this academic year. The interim leadership arrangements are not financially sustainable from the school's budget; the Council is currently funding these arrangements. The Lewes Co-operative Learning Trust has confirmed that they do not have the capacity to sustain longer term leadership for the school. If the decision is reached that the school will close the Trust would be prepared to provide further interim leadership, in the interests of the children at the school, during the period of closure. However these arrangements will not be available should the decision be made to keep the school open as this would require a different plan and increased leadership capacity to take the school through very challenging circumstances.</p> <p>Our normal procedure when going through a process like this would not be to attempt to recruit to a permanent headteacher role until a final decision is taken on the proposal in case that decision should be to close the school. It is unlikely that a prospective Headteacher seeking a permanent position would commit themselves to a school in such circumstances.</p>

Strengths of Pells CE Primary School

Consultee Comment	County Council Response
<ul style="list-style-type: none"> Many of the pupils prefer the security and comfort of a smaller school with a caring environment. Parents value sending their children to the school as it offers smaller class sizes and they feel they would not thrive in a larger school. This school's demographic is different from all others in the town. It is part of the community and provides a non- 	<p>The Council recognises that reviewing the future of any school is controversial and emotive. The Council is challenged with balancing the sensitivities of community feeling on the one hand, with consistently providing a high quality education offer which can be sustained and afforded. Pupils, parents, carers and teachers, both current and past have strong ties to the schools they attend or have attended as part of their own life-stories.</p> <p>Pells CE Primary School is a mainstream school and all mainstream schools are required to meet the individual needs of all their pupils including those with SEN. All schools in the area want all children to thrive and have access to a range of support to help with their needs. The Council expects that all children who move from the Pells CE Primary School to other schools would be provided with the same level of care at their new school. Outcomes for children with similar needs are good in other schools.</p> <p>The school has received significant support from the Council and the Diocese but despite this the school continues to face challenges in</p>

<p>judgemental, specialist scheme to children and families with diverse needs.</p> <ul style="list-style-type: none"> It is a community led by the dedicated teachers, who have carried the school with no visible input from the county. 	<p>achieving an Ofsted judgement as a good school.</p> <p>The Council has recognised the contribution staff make to Pells CE Primary School. However, the Council cannot avoid making decisions for the future which are in the best interests of children and young people.</p>
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Impact on pupils

Consultee Comment	County Council Response
<ul style="list-style-type: none"> Moving my children will have an adverse effect on their education as they are settled at school and doing well Friendship groups may be split up. The closure could result in siblings being at different schools (increasing time/finance burden of transport and emotional impact of split) Current Pells pupils living near the school will have to travel a long way to other schools in some cases and there aren't good enough local public transport links in the town. This process has created an atmosphere of uncertainty for parents of pupils at the school and are already moving their children to other schools. This is unsettling for pupils who remain at the school. 	<p>The Council recognises that proposing changes to school organisation means there will be changes for pupils. Were closure approved, arrangements would be made for parents/carers to apply for a place at an alternative school in the local area. Parents/carers would be asked to complete an admissions application form and to name up to three schools they would like their child/ren to attend. Parents/carers would be offered a school place for their child/ren, either at one of their preferred schools named on the application form, or if this is not possible, at the nearest school to the child's home where a place is available. It should be noted that parents have a right to express a preference for a school, not to choose which school their child/ren attend.</p> <p>The Council will try to meet parents/carers' preferences wherever possible but cannot guarantee to do so. The allocation of places will be made in line with the admissions policy as set out in the school admissions booklet which is available on the East Sussex website. https://new.eastsussex.gov.uk/educationandlearning/schools/admissions/</p> <p>The Council and affected schools have a duty to support appropriate transition arrangements and the Council would take all practical steps to ease the transition for pupils, most especially for vulnerable learners and those with SEND.</p> <p>Should the proposal be implemented the Council would work with pupils, their parents and the relevant schools to make appropriate transition arrangements for pupils to familiarise themselves with their new environment.</p> <p>Were the school to close the Council is confident that teaching staff at other schools would manage the transition that any pupils from Pells CE Primary School who are moved into the school will benefit from the new arrangement.</p> <p>In the event of closure we recognise that there could be an impact upon the length of journeys between home to school for some pupils on roll. Home to school transport will be provided in accordance with East Sussex County Council's published policies, with individual cases being considered on their merits.</p>

Alternative Suggestions

Consultee Comment	County Council Response
<ul style="list-style-type: none"> Not enough has been done to investigate alternative options for the school Explore sufficiently all options for amalgamation and federation and take into account the unique data of the school with its 	<p>The Council has been actively promoting federation with schools since November 2014 and has, along with the Diocese, spent a considerable amount of time exploring options for Pells CE Primary School. No Academy Trust has expressed an interest in taking the school into their Trust; the long term underperformance, low parental preferences and low pupil numbers means that it is very unlikely to be attractive to an Academy Trust.</p> <p>Whilst the Lewes Co-operative Learning Trust have a commitment to improve the outcomes of all pupils in the town and is providing interim leadership, the Trust and other schools are not willing to federate or</p>

<p>percentages of SEND and PPD.</p> <ul style="list-style-type: none"> Consider the school offering the option of flexi schooling Consider making the school a farm or forest school to attract a wider social mix of children and enable less academically inclined children to excel in and enjoy other skills Consider formally changing the school into one for children with more difficulties Twin a good school in Lewes with Pells and share senior staff The best option, given the key location of the school and its superb site, would be close to it and then re-open it under a new name (Trinity School?) and new leadership. 	<p>amalgamate with Pells CE Primary School. It is unlikely that federation would improve the popularity of the school anyway. No other school has room to accommodate all the pupils from Pells CE Primary School on their own site – a split site school has been considered but would create difficult challenges for the school and parents to manage, and in any event, no school has shown an appetite for that model.</p> <p>The Council has a role in supporting schools to explore federation but it is not responsible for securing those partnerships. Federation is a decision made by the governing bodies of schools and the local authority can only direct governing bodies to federate in exceptional circumstances i.e. when it has been identified as causing concern and is eligible for formal action.</p> <p>The Council did not receive any proposals for the future of the school during the consultation process and no firm proposals were shared with the school leadership or governing body. On 23 May 2016 the Chair of Governors confirmed in a telephone conversation with the Assistant Director: Education and ISEND that the governing body were not bringing forward a solution and that no groups had discussed any potential solutions with her regarding the future of the school.</p> <p>Following a meeting between the Director of Children's Services, the Assistant Director: Education and ISEND and Councillor Ruth O'Keeffe on Friday 24 June 2016, a proposal was submitted on 29 June 2016 by Councillor O'Keeffe for a 'Farm School Approach' for Pells CE Primary School. This proposal was not shared with the school during the consultation period but has since been sent to the Chair of Governors. As requested by the Lead Member this proposal has been fully evaluated by officers who have assessed that the proposal does not address the key challenges that the school faces, it has not been fully costed by the proposer and will not lead to the rapid improvement required at the school. The proposal and evaluation are provided in Appendix C of the Cabinet report. The Chair of Governors has reviewed the plan and her view remains unchanged that there is no sustainable way forward for the school in light of the significant challenges the school is facing.</p> <p>The proposal has been costed by officers and is found to be unaffordable. The Farm school would cost at least £100K to set up, and cost £50K each year to cover running costs. In addition setting up a Farm School would require planning permission for change of use and constructing any necessary buildings. This process would take at least 6 months and would cost in the region of £20K. Any loss of playing field space would also require Secretary of State permission. The proposal does not offer a financially viable solution for the school.</p> <p>Though much has been made of the local community support for the school, this is not supported by the data in 2.1.5 of the Cabinet report which show that the majority of families living on the Landport Estate, have not chosen, and do not choose to send their children to the school, and that the popularity of the school continues to decline. There is no evidence that the Farm School proposal would increase the popularity of the school.</p> <p>The imminent Ofsted inspection, which in light of the key stage 2 results this year we would now expect early next academic year, is likely to judge the school to be inadequate and this does not allow time for any further exploration of options for this school.</p>
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Impact of the proposals on Teaching Staff

Consultee Comment	County Council Response
What will happen to the teaching and support staff?	Should the current proposals be implemented, the Council would work with the current members of staff, including teaching and support staff in line with the Council's 'Managing Change Policy'. The Council would seek to minimise any compulsory redundancies as a result of the closure. If there are any school-based vacancies in East Sussex that are of

	interest to those staff at risk of redundancy, colleagues in Personnel and Training would liaise with the school(s) regarding the availability of staff to fill the vacancy, by seeking the agreement of the school to participate in the redeployment process, or at least offer an interview to a member of staff at risk of redundancy who meets the essential criteria of the person specification. For vacancies within the Council, other than in schools there is a mechanism for staff at risk of redundancy to join the redeployment register.
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Impact on Community

Consultee Comment	County Council Response
<ul style="list-style-type: none"> Pells has a long standing history in Lewes. To close it would be a travesty. The school is the heart of the community and closing it will have a devastating effect on the community and local businesses. 	<p>The Council and the Diocese acknowledge that where a school closure is proposed it will have an impact on the local community. The Council and the Diocese have no plans for the site and will not consider the future of the site until such time as the school's future is determined in order to remain impartial during the consultation. If the decision was taken to close the school and the school site was sold, the Diocese proceeds would go into an education foundation account to be invested and used for education purposes in the Diocese and it would be for the trustees to decide whether the money would be reinvested in the local area to support children who have been displaced from the school. In disposing of the playing field, the Council would require consent from the Secretary of State under Section 77 of the Schools Standards and Framework Act 1998.</p>

Impact of the proposals on other schools

Consultee Comment	County Council Response
<ul style="list-style-type: none"> The closure would result in increases in numbers in classes at other schools and being scheduled to the limit. My children's school has a considerable number of new pupils from this area and has seen a considerable increase in behavioural issues from an influx of anxious and unsupported children which is impacting on my children. Bigger classes could lead to disruption and affect the quality of learning children will receive. The council should consider the imbalance of Christian Faith Schools in Lewes if there is a closure. 	<p>A full response including the detail on the impact of closing the school on school places, and details of our pupil forecasting methodology and pupil yield for housing development is provided in Appendix B of the report to Cabinet.</p> <p>Pells CE Primary School is a mainstream school and all mainstream schools are required to meet the individual needs of all their pupils including those with SEN. All schools in the area want all children to thrive and have access to a range of support to help with their needs. The Council expects that all children who move from the Pells CE Primary School to other schools would be provided with the same level of care at their new school. Outcomes for children with similar needs are good in other schools.</p> <p>There are a number of other church schools (listed below) in the town that parents will be able to express a preference for when applying for a school place:</p> <p>Iford & Kingston CE Primary School Southover CE Primary School, Lewes South Malling CE Primary School, Lewes St Pancras Catholic Primary School, Lewes</p>

Other Comments

Consultee Comment	County Council Response
<ul style="list-style-type: none"> I think the council is being rather selfish and just thinking of how much extra money they can put 	<p>The Council does not save any money by closing the school – Council funds are separate to school funding. But school funds are public money and we have a responsibility to ensure efficient use of school funding; inefficient use impacts on all schools and children in the county. The government is also making changes to the national funding formula which</p>

<p>in their pockets and not the children whose education and confidence and well-being will suffer.</p> <ul style="list-style-type: none"> • This is about the Council profiting from the sale of the land • You should fully consult parents with children who attend the school, all staff and the local community • If you have to close the school mothball it because birth rates are cyclical and it will avoid wasting money on building new schools. 	<p>will mean schools will face additional challenges in the future.</p> <p>The Diocese owns the majority of the school site, the Council owns the playing field. The Council and the Diocese have no plans for the site and will not consider the future of the site until such time as the school's future is determined in order to remain impartial during the consultation. If the decision was taken to close the school and the school site was sold, the Diocese proceeds would go into an education foundation account to be invested and used for education purposes in the Diocese and it would be for the trustees to decide whether the money would be reinvested in the local area to support children who have been displaced from the school. In disposing of the playing field, the Council would require consent from the Secretary of State under Section 77 of the Schools Standards and Framework Act 1998.</p> <p>The consultation process has included consultation with parents, all staff and the local community.</p>
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Responses generally accepting of the Proposal

- The children may thrive if they have the opportunity to have an education alongside other Lewes children in bigger schools
- Parents should vote with their feet, ie move their children to Pells. If enough parents sent their children to the school I assume the Council would have to keep it open. Without this sort of support, I feel that the Council has no option but to close the school.
- The best thing we can do for these children is to give them the opportunity of an education alongside other Lewes children in bigger schools where they will have the chance to thrive
- Although I understand the Council's reasons for proposing to close Pells CE Primary and am sorry that there is no immediate solution could the Council please consider
 - How best to support the particular needs of the pupils, particularly vulnerable children many with SEND and some from deprived backgrounds, who will suffer greatly from the closure of the school., those with SEND, who currently attend Pells?
 - The large number of primary age children from the North Street development, the number of which has been seriously underestimated by the council, according to Maria Caulfield MP. The best option, given the key location of the school and its superb site, would be close to it and then re-open it under a new name (Trinity School?) and new leadership.
- Pells has always had a poor reputation and has been the 'sink' school in the town. It has failed the children of Landport and should be integrated into their town.

8. Petition

- 8.1 During the consultation period a 5,000+ signature petition in relation to the proposed closures of both Rodmell CE Primary School and Pells CE Primary was submitted to the Local Authority. The petition is available for members to view.
- 8.2 The petition was presented at Full Council on 10 May 2016 where the following motion was moved.

In view of the increasing need for Primary School places in and around Lewes in the next five years, the strength of public feeling shown by a petition of over 5,000 signatories and the emerging plans for the future at both Rodmell School and Pells School, the Council recommends to Cabinet that the process towards the closure of these two schools is halted at the end of the consultation to enable these plans to be put into place.

- 8.3 A recorded vote on the motion was requested and taken. The motion was carried, the votes being cast as follows - 28 for the motion and 20 against the motion. In accordance with the Lead Member decision and the resolution of the Council we have sought to look at possible alternative options and to engage with stakeholders to consider any emerging plans that are put forward.

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Pupil Forecasting and School Places

1. Introduction

- 1.1 School place planning predictions are derived mainly from the Council's pupil forecasting model. The model produces forecasts of the number of children and young people in state funded primary and secondary schools in East Sussex (including maintained schools, free schools and academies).
- 1.2 The model forecasts pupil numbers:
- Countywide
 - For each district and borough
 - For each primary and secondary school place planning area (based largely on admissions areas)
 - For each individual primary (including infant and junior) and secondary school
- 1.3 In producing pupil forecasts a number of key factors are taken into account. For the purposes of this report these include:
- Existing and planned capacities of school places as well as published intake numbers
 - Existing numbers of pupils in schools (from pupil census data)
 - Future births (from Office of National Statistics data) and resulting primary reception year intakes
 - GP registration data
 - Parental preference for primary reception year
 - New housing development in each area and the likely pupil yield
- 1.4 In the absence of live birth data, longer term predictions are based on the Council's Policy Based Population Projections of future births.

2. Accuracy of forecasts

- 2.1 The Council's forecasts achieve a good standard of accuracy and compare well to other local authorities. For instance the accuracy of the one year ahead total primary number on roll forecast for the last four years is as follows:

One year forward primary number on roll forecast	
Academic Year	Accuracy
2012/13	+ 0.5%
2013/14	+ 0.4%
2014/15	+ 0.4%
2015/16	+ 0.1%

- 2.2 Note that the Council's forecasts tend to err on the high side.

3. New housing development

- 3.1 Based on data provided by Lewes District Council, the Council's pupil forecasts assume that between 1000 and 1100 new housing units will be completed in Lewes Town in the period 2015/16 to 2029/30. This includes the developments at North Street and Old Mallig Farm as follows:

Development	Total Dwellings	Estimated Mix			Estimated Completion Timescale
		Houses	Flats 2 bed +	1 beds	
North Street	365	212	90	63	2017/18 - 2020/21
Old Mallig Farm	200	147	13	40	2020/21 - 2024/25

Note: The dwelling totals for North St exclude 51 extra care units which are unlikely to house children

- 3.2 From past experience the Council has found that new housing often does not build out as quickly as completion timescales envisage, so the timescales set out above may be optimistic.

4. Births

- 4.1 Births are the major determinant of pupil numbers, as one birth more or less equates to the need for one school place five years later. Births tend to peak and trough in 10-13 year cycles. In East Sussex, births peaked in 2010/11 and are now in the downward part of the cycle. This downward trend has been evident in Lewes Town as the following table shows:

Live Births, Lewes primary schools area

Year of Birth	2009/10	2010/11	2011/12	2012/13	2013/14	2014/15
Primary Reception Year	2014/15	2015/16	2016/17	2017/18	2018/19	2019/20
	201	195	195	178	137	134

Forecast as at 01.07.16

- 4.2 Based on these figures of actual births, we can be confident that there will be sufficient reception year spaces in the town until the turn of the decade. Beyond that the predictions rely on demographic projections of future births which are derived from the Council's Policy Based Population Projections. These projections take account of factors such as migration, fertility rates and, crucially, levels of planned new housing in the area.
- 4.3 Higher than normal levels of new housing in an area can be expected to boost the number of births as housebuilding aids inward migration and a move to a new home often coincides with people starting a family. Housing data used in the birth projections for Lewes Town are consistent with that used in the pupil forecasts (i.e. 1000 – 1100).
- 4.4 Taking account of this level of housing completion, the projections give a birth total averaging 157 per annum over the time period. To err on the side of caution the reception year pupil forecasts are set at a higher average – of just over 180 - and skewed so that the highest reception year intakes mirror (with an approximate 5-7 year delay) the projected years of highest housing completion in the town.
- 4.5 The table below looks at the historical relationship between births and primary reception year intakes in Lewes over the last seven years.

Births v reception year intakes	2004/05 (2009/10 intake)	2005/06 (2010/11 intake)	2006/07 (2011/12 intake)	2007/08 (2012/13 intake)	2008/09 (2013/14 intake)	2009/10 (2014/15 intake)	2010/11 (2015/16 intake)
Live births (from ONS data)	199	156	178	184	163	199	194
Reception year intakes	192	175	220	189	177	213	198

4.6 As the table illustrates, generally there has been a higher uptake of school places than births in Lewes reflecting either children moving into the town before they reach school age or parents choosing Lewes schools from outside the local area.

4.7 Pupil forecasts for the following academic year (2016/17) are based on admissions allocations on National offer Day and allow the Council to make a firm prediction on numbers.

4.8 Pupil forecasts for the following three academic years (2017/18 to 2019/20) use actual birth data and GP registrations at 31 August 2015. The forecasts take account of the historic relationship between births and GP registrations and the resulting reception year numbers (reception year numbers tend to be higher than births) but also children moving into the area and requiring a reception year place as a result of new housing development.

4.9 The table below provides the birth and GP registration data and the admissions allocations (where applicable) for the next four academic years for the town.

Births and GP registrations	2016/17 (2011/12 births)	2017/18 (2012/13 births)	2018/19 (2013/14 births)	2019/20 (2014/15 births)
Live births (from ONS data)	193	176	136	134
GP registration data at 31 August 2015	212	175	139	124
Admissions allocations April 2016	202	n/a	n/a	n/a

5 Pupil yield from new housing development

5.1 In addition to factoring in the impact of new housing on future births, through its pupil yield factors the Council's pupil forecasts also allow for the impact of families with school aged children moving into new housing and creating additional demand across all academic year groups.

5.2 The Council's primary pupil yield factors are as follows:

Pupil yield per new dwelling by property type and size	Houses 2 bed+	Flats 2 bed+	All 1-bed
Primary school yields	0.25	0.0375	0.00

5.3 Pupil yield factors are based on the surveys of residents of new housing development. In 2014 and 2015 the Council commissioned consultants Cognisant Research to undertake a study to review its pupil yield factors. The Cognisant Survey involved a mixture of face to face interviews and self-completion questionnaires with a sample of over 1000 households living in newly built housing across East Sussex.

5.4 This survey found the following 'direct' pupil yields.

Direct pupil yields per new dwelling by property type and size (Cognisant Survey)	Houses 2 bed+	Flats 2 bed+	All 1-bed
Primary school yields	0.32	0.16	0.01

5.5 However, the survey also found that many families who had moved into new housing had not changed their children's school. Cognisant were commissioned to undertake a further analysis of the survey data to take account of this fact. The study also allowed for the possibility that when households move to a new dwelling, the dwelling they vacate could potentially be occupied by a family with children (a phenomenon known as backfill).

5.6 This study resulted in the following 'net yields' per dwelling:

Net yields per new dwelling by property type and size (Cognisant Studies)	Houses 2 bed+	Flats 2 bed+	All 1-bed
Primary school yields	0.23	0.11	0.06

5.7 For houses (the dwelling type where most school aged children are to be found) the net yield analysis not only resulted in a lower primary pupil yield than the direct yield analysis, the net yield was also lower than the existing yield factor for housing.

5.8 While in many respects the net yield analysis represents a more sophisticated calculation of pupil yield, in view of the risk that it may underestimate the true level of pupil yield, Children's Services Senior Management Team decided to continue using the Council's existing pupil yields which give a slightly higher pupil yield for houses. This means our forecasts will over estimate pupil numbers rather than under estimate.

5.9 The agreed pupil yields are factored into the forecasts for Lewes Town shown above. Note that the entire pupil yield from new housing development will not impact on schools all in one year. It will be spread over a number of years and academic year groups. In consequence, some school places used by some children arising from the new housing will be vacated and, therefore, available to later children arising from the new housing.

5.10 In the early 2020's, in any one academic year, the pupil yield calculation typically adds between 70 and 80 children to the total number on roll primary school forecast for Lewes Town. (Note that this is in addition to the allowance for the impact on new housing on future births referred to above).

6. Case study in Hailsham on the impact of new housing on primary pupil numbers

- 6.1 The recent experience of Hailsham gives an example of what the impact of large volumes of new housing on pupil numbers might be in practice. In the three years 2011/12 to 2013/14 a total of 736 dwellings were completed in Hailsham and Hellingly. Assuming approximately 75% were houses, based on our existing pupil yields this would give a primary pupil yield of around 145 additional pupils. This assumed yield was checked against actual numbers in Hailsham primary schools between 2011/12 to 2014/15. When the effect on reception year number increases attributable to increases in births five years previously (i.e. before the new housing was built and therefore not arising from it) was discounted, the net increase in pupil numbers in Hailsham primary schools was fewer than 30 pupils. This suggests that the immediate impact on demand for school places from additional children moving into the area to occupy new housing may not be as high as anticipated, and that the major effect of new housing on demand will come via the delayed impact on future births and Reception Intake numbers.

7. Pupil numbers at Pells CE Primary School

- 7.1 Pells CE Primary School has suffered from very low parental preferences for many years as illustrated in the table below. Even at times of high demand for places in the town the school has been unpopular and unable to attract sufficient pupils.

	2012/13		2013/14		2014/15		2015/16		2016/17	
Published Admission Number (PAN)	1st Prefs	% 1st Prefs Above/ Below PAN	1st Prefs	% 1st Prefs Above/ Below PAN	1st Prefs	% 1st Prefs Above/ Below PAN	1st Prefs	% 1st Prefs Above/ Below PAN	1st Prefs	% 1st Prefs Above/ Below PAN
20	7	-65%	6	-70%	9	-55%	11	-45%	9	-55%

- 7.2 For 2016/17 only nine first preferences were received by the closing date for applications. This number reduced to four after parents were given the opportunity to re-submit their preferences. A late application was received for Pells so the school is likely to start September with five children in its reception year.
- 7.3 The take up of reception year places from those who have attended the early years provider on site (Pippa's Group) is low and declining:
- 2012/13 - 4 out of 8 children (50%)
- 2013/14 - 5 out of 8 children (63%)
- 2014/15 - 8 out of 12 children (67%)
- 2015/16 - 6 out of 13 children (46%)
- 7.4 In the period 2001/02 to 2003/04 pupil numbers at the school were close to its capacity of 140. Over the last twelve years numbers have been on a downward trend – in the period 2004/05 to 2009/10 numbers were generally between 110 and 120 each year. Since 2010/11 numbers have been less than 100 and as low as 83 in 2013/14.
- 7.5 Over the last five academic years the percentage of primary age children living on the Landport Estate attending Pells CE Primary School has fallen from 34% (70 pupils) in January 2012 to only 23% (51 pupils) in January 2016. In contrast the percentage of children living on the Landport Estate attending other schools in Lewes has risen from 62% (127 pupils) in January 2012 to 74% (164 pupils) in January 2016. This is illustrated in the tables below.

Pupils living on the Landport Estate as at January School Census	2012	2013	2014	2015	2016
Primary	204	204	210	217	222
Total	204	204	210	217	222

Primary School Pupils living on the Landport Estate, by School/ Location	Number					Trend
	2012	2013	2014	2015	2016	
Pells	70	57	51	50	51	
Other Lewes School	127	143	152	158	164	
Outside Lewes	7	4	7	9	7	
Total	204	204	210	217	222	

Primary School Pupils living on the Landport Estate, by School/ Location	Percentage					Trend
	2012	2013	2014	2015	2016	
Pells	34.3%	27.9%	24.3%	23.0%	23.0%	
Other Lewes School	62.3%	70.1%	72.4%	72.8%	73.9%	
Outside Lewes	3.4%	2.0%	3.3%	4.1%	3.2%	

Lewes schools as described above are those which fall in the three wards covering Lewes town: Lewes Bridge, Lewes Castle and Lewes Priory.

8. Forecasts for Lewes Town

- 8.1 The latest update to the forecasts for Lewes Town has just been completed. The forecasts are based on the January 2016 Pupil Census.

Year R forecast – Lewes Town

2015/16	2016/17	2017/18	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31
198	202	187	148	159	185	182	177	188	188	190	187	181	174	164	164

Forecast as at 01.07.16

Published Admission Number = 220 (200 excluding Pells)

Total number on roll forecast for Lewes Town

2015/16	2016/17	2017/18	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31
1459	1470	1475	1417	1401	1417	1391	1366	1345	1340	1381	1402	1390	1377	1360	1331

Forecast as at 01.07.16

Capacity = 1600 from 2016/17

1570 from 2018/19 (1430 excluding Pells)

1540 from 2023/24 (1400 excluding Pells)

- 8.2 The forecasts take account of recent and predicted future trends in births. They make an allowance for migration (through the application of a recent historic average cohort survival factor). They also allow for the impact of planned new housing on pupil numbers.

9. School places available in the local area

- 9.1 The table below sets out the predicted number of spaces available in other schools in the town were Pells CE Primary School to close in August 2017. The information is based on year group numbers provided by the schools in May and June 2016 rolled forward two academic years. Reception and Year 1 numbers are based on the intake forecasts set out in Table 4 above.

Space available at alternative schools	Predicted number on roll by year group 2017/18							
	R	1	2	3	4	5	6	Total
Pells CE Primary School								
Pupil numbers by year group	6	4	12	15	8	8	8	61
Lewes schools								
Pupil numbers by year group	181	198	184	201	204	192	219	1379
Year Group PANs	200	230	200	200	200	200	230	1460
Spaces available	19	32	16	0	0	8	11	81
Iford & Kingston CE Primary School								
Pupil numbers by year group	25	30	30	31	29	26	25	196
Year Group PANs	30	30	30	30	30	30	30	210
Spaces available	5	0	0	0	1	4	5	14

Source: Data provided by schools to the Admissions Team in May/June 2016

Pupil numbers for Reception to Year 4 are rolled forward for 2017/18 (e.g. current Year 4 is shown as Year 6 in 2017/18)

Pupil numbers for Reception and Year 1 are taken from the provisional intake forecasts for 2016/17 and 2017/18

Year group PANs have been adjusted to take account of existing and proposed bulge classes.

- 9.2 The Council believes there will be sufficient places available in other schools in Lewes in 2017/18 for children from Pells CE Primary School were it to close, although a shortfall of places would be expected in Years 3 and 4. This would be addressed in collaboration with the other schools in the town. The Lewes Co-operative Trust has already indicated a willingness for schools to exceed PAN if necessary to ensure every child has a place. In the highly unlikely event that there is a short term additional demand for places there is capacity at other schools in the town to provide one off bulge classes if required.

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Appendix C

Criteria for the Evaluation of Proposals for Partnership

Proposal Name	Farm School Approach
Submitted by	Cllr Ruth O'Keefe
Date submitted	29 June 2016
Governing Body Approval?	The proposal does not have Governing Body approval. The Governing Body were not involved in drawing up the plan. The Chair of Governors has indicated that she believes that this proposal does not present a sustainable way forward for the school in light of the significant challenges the school is facing.
Evaluation Date	29 – 30th June 2016
Overall assessment	<p>The proposal sets out an approach to address the Ofsted priorities from the most recent inspection (March 2015) by developing a farm curriculum.</p> <ul style="list-style-type: none">• This is not a credible proposal because:<ul style="list-style-type: none">○ It does not address the challenges the school faces of low pupil numbers, financial stability, and pupil performance.○ No business plan has been submitted that provides evidence that the proposal will lead to financial viability.○ The proposal does not deliver any transformational approaches to teaching and learning. The approaches to teaching and learning suggested are already used at the school.• No explicit vision is stated. The proposal does not provide clear objectives, targets or milestones for implementation and the measuring of impact.

	<ul style="list-style-type: none"> • The milestones do not drive and monitor the progress of the school from its current weak position to an Ofsted 'Good'. • There is no indication as to how the proposed farm curriculum will meet all National Curriculum requirements and enable accelerated progress for the pupils at Pells. Therefore, there is no clarity about how the quality of education, outcomes and progress, will improve for all pupils who are vulnerable to underachievement at Pells. • The issue of the required leadership of the school from September 2016 has not been addressed; this is a significant weakness of the proposal. The proposal does not refer to the leadership capacity required to improve and sustain improvement; there is no capacity resulting from partnership with another school which we would expect to see for this school. • The proposal references a consultancy headteacher role (an ex Lewes headteacher). However, there is no indication of the time commitment of this role, or whether this is a substantive post. There is no evidence of the impact of this leadership approach on pupils' outcomes. The Pells school budget cannot support the cost of a consultant headteacher and the plan does not indicate how the day to day leadership role would be funded or undertaken. • Staff development includes the use of Initial Teaching Trainers (ITT). There is no evidence regarding the capacity and quality of these personnel, how they will deliver teaching commitments across the year and whether their teaching will cover school or university weeks. • This proposal does not demonstrate that it would lead to increased pupil numbers to ensure a sustainable budget in the future. • The costings for set up and annual running costs of a Farm School are at least £100K and £50K each year thereafter. These costs could not be supported by the school budget and there is no evidence that this significant resource would address the challenges of the school's underperformance. • Setting up a farm at Pells CE Primary School would require Planning Permission for change of use and for constructing any necessary buildings; this would take a minimum of 6 months and would incur costs of
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	<p>approximately £20K (this cost is in addition to the £100K estimated above for the set-up of the Farm School). Any loss of playing field as a result of the proposal would also require Secretary of State approval. No work on setting up the farm could begin until planning permission was secured.</p> <ul style="list-style-type: none"> • There is no locally or nationally available evidence that a plan of this type will improve performance of pupils at the school, or increase its popularity in the community.
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Criteria for Evaluation:

All proposals will be assessed against the key areas set out below.

1. **Vision**
2. **Education Plan**
3. **Capacity and Capability**
4. **Evidence of strong track record**
5. **Financial Sustainability**

	Criteria	Comments
1	Vision	
	Is there a clear vision set out for the partnership?	No explicit vision is stated. The proposal broadly sets out how a farm approach could be implemented at Pells but not how this will improve outcomes for pupils. No partnership solution is proposed.
	Is there evidence that leaders of both schools are committed to the vision?	No. No specific school partners are named.
	Is the vision appropriate for the particular context of the schools?	The objectives are aligned to the Ofsted key priorities but are not sufficiently robust to address the detail of the actions that need to be undertaken in the timeline to the imminent Ofsted inspection.

	Criteria	Comments
2	Education Plan	
	Is there a curriculum plan which is consistent with the vision and pupil intake?	<p>The references to the curriculum draw on the context of farming as the context for learning. Many schools already use context based learning to engage pupils and provide a purpose for learning and indeed Pells School already offers a varied range of activities which are integrated with the curriculum. These activities progressively build on creativity and are carefully planned throughout the school year. Examples include:</p> <p>Topic: Into the Woods. This is linked to the Forest School which is on offer within the school and in partnership with Priory School. These offer real life challenges which necessitate depth of learning.</p> <p>Trips and Learning within the Local Community. Sussex Wildlife and Railway Land Live. This project allows students to collect evidence (e.g. mini beasts), research environmental issues and create podcasts.</p> <p>Topic: Battle of Lewes. This is linked to Priory Ruins and is a whole school project delivered in the summer with a comprehensive cross curricular approach. Every child visits the site and experiences a range of practical and academic activities e.g. cooking, gardening and research. This is followed up in school with workshops which develop writing with a purpose.</p> <p>Trips out: these include Lewes Foundry (art Based), Brighton Museum (History), Blacklands Farm (PSHE and PE). In addition there is participation in District Sports and</p>

	Criteria	Comments
		<p>local; sports festivals and PATINA Moving on parade (a strong local community project which involves working with artists).</p> <p>It is not clear how the proposed approach would specifically bring about the rapid improvements required to improve outcomes for all pupils. The proposal does not deliver any transformational approaches to teaching and learning. The approaches to teaching and learning suggested are already used at the school.</p> <p>The proposal does not demonstrate sufficient attention to the make-up of the pupil cohort at Pells including the high numbers of FSM and SEN pupils and the impact that this approach will have on these pupils.</p> <p>A key challenge at the school is the development of the required skills in reading, writing and maths in cohorts of pupils who arrive with low prior attainment and low aspiration and lacking basic skills (e.g. speaking and listening). The school has already provided extensive coaching and support for staff, including being part of the 'maths triad' with other local schools.</p> <p>The proposal lacks detail about behaviour management, especially those with complex needs and presenting extremely high levels of challenge and need.</p> <p>Safeguarding is high profile and demands robust and rigorous systems, monitoring, intervention and support.</p>

	Criteria	Comments
	Are the key issues/priorities for improvement clear?	No. Ofsted key issues are referenced but these are not all the key issues and priorities for improvement that the school has identified. There is no reference to how the issues of financial sustainability, substantive leadership, and the longer term viability of the school will be addressed.
	Does the proposal make reference to key issues from the most recent Ofsted inspection and/or external review?	The proposal only references the Ofsted key issues but does not link these to actions that will address these priorities.
	Does the proposal identify activity that will address the issues identified in the school's self-evaluation and, in particular, issues raised by the most recent data analysis?	No, there is no reference to the school's self-evaluation or data analysis. There is no reference to recent adviser visits where concerns have been raised regarding the time taken for recent initiatives to demonstrate impact.
	Are targets set for attainment, progress, attendance and quality of teaching, including for vulnerable groups?	No. There are no measurable criteria in the proposal.
	Are there short-term targets of interim milestones?	No
	Is it clear how actual performance will be measured against targets?	No
	Are clear success criteria/practice indicators identified for improving the quality of provision in the school?	No
3	Capacity and Capability	
	Is the leadership structure detailed, is there sufficient capacity?	The only leadership referenced is the 'leadership

	Criteria	Comments
		<p>involvement of an experienced headteacher – no new cost'. These costs are not included in the proposal.</p> <p>The 'experienced Headteacher' referred to does not have experience of leading partnerships that have been successful in securing improvements. This Headteacher has had limited engagement in the Lewes Area Review and the final report. This would suggest that there is limited understanding of the issues that the school faces and of the capacity needed to bring about improvements.</p> <p>The issue of the required leadership of the school from September 2016 has not been addressed; this is a significant weakness of the proposal. The proposal presents insufficient capacity for leadership, there is no capacity resulting from partnership with another school which would be expected for this school given its size and context and which has been used to good effect whilst the school was in Special Measures.</p> <p>The intended use of pupil premium to fund elements of the proposal is likely to impact on current levels of staffing in the school. The school currently delivers small group teaching utilising the intervention teacher funded by the pupil premium grant.</p>
	Is there a clear staffing structure proposed?	No staffing is detailed other than the provision of Initial Teacher Trainers (ITT) students, who are referenced as providing teaching support via a learning hub and for

	Criteria	Comments
		<p>whom there is no cost. The proposal details the staff development budget to develop existing staff however it does not present the budget plan for this.</p> <p>National research shows that it is not good practice for untrained teachers to support those pupils who are most vulnerable to under achievement and that there would be a lack of understanding of the requirements needed to improve performance through high quality teaching.</p>
	Is there a detailed plan for the implementation of the proposal?	No. There is no timeline for implementation. This plan would need to be in place by September 2016 but this would not be achievable.
	Are there timescales for actions?	The timescales provided are not broken down and are too broad.
	Is it clear who is leading on each aspect of the proposal?	No. No personnel are referenced other than an ex-headteacher in a consultancy capacity. No time/financial commitment is specified.
	Is it clear how the proposal will be monitored, and by whom?	No. There is no monitoring built into the proposal.
	Is it clear how the impact of the proposal will be evaluated, and by whom?	No. There is no evaluation built into the proposal. Although there is a column entitled 'Impact Evaluation Measurement Tool', the contents do not provide a robust evaluation method.

	Criteria	Comments
	Is the role of governors in evaluating progress clear?	No. There is no reference to governance built into the proposal.
	Is the proposal manageable and achievable?	No. The proposal is not sufficiently robust to be either manageable or achievable.
	Will the proposal enable the school to move up to the next inspection category within the agreed timescale?	No this cannot be achieved; please see comments below about the planning permissions required to set up the Farm School which indicate that this would take at least 6 months. There is no evidence that this would secure improvements in pupil achievement.
	Is there a clear partnership agreement in place or a timetable to ensure an agreement is in place?	There is no school named for an agreement, nor any timescale for identifying a school, implementing a partnership agreement or working in partnership.
4	Evidence of Strong Track Record	
	Do those submitting the proposal have a strong track record in successful partnership working?	No evidence of a good track record of partnership working from those submitting the proposal.
	Do those submitting the proposal have a strong track record of improving pupil outcomes, including for vulnerable groups?	No evidence of a good track record of improving pupil outcomes from those submitting the proposal.
	Do those submitting the proposal have a strong track record of financial management?	No evidence of a good track record of financial management from those submitting the proposal.
5	Financial Sustainability	

	Criteria	Comments
	Is it clear how the proposal will be financially affordable for the next three years?	<p>The plan references a £38,000 carry forward and an unspecified amount of pupil premium funding to be used to deliver the proposal. There is no 3 year budget plan. The £38,000 carry forward arose from additional resource provided by the Council for interim leadership and additional staff capacity in the academic year (£28k) and £10k from the health improvement grant. These resources have been allocated within the current school budget against current expenditure. Pupil Premium Funding is already committed to staffing costs and is not additional monies.</p> <p>Costs for setting up and running a farm school have been provided by a school that already have this model. They have advised that the costs for the set-up would be in the region of £50,000 and that running costs per year are £55K per year which includes animal feed and associated costs and staffing for a farm manager and farm assistant that provide cover 365 days a year. The school budget cannot support either the set-up costs or the on-going funding costs of a farm school.</p> <p>Setting up a farm at Pells CE Primary School would require Planning Permission for change of use and for constructing any necessary buildings. As the school is adjacent to a conservation area and within the South Downs National Park, it would also need a Landscape and Visual Impact Assessment and possibly an</p>

	Criteria	Comments
		<p>Environmental Impact Assessment, in addition to the usual considerations of impact on neighbouring properties. Planning Officers at the County Council have estimated that we would need a minimum of 3 months to draw up the application and then a minimum of 8 weeks to determine the application. In total it is advised that this would require 6 months for the application and determination process and around £20k for the costs, which would have to include employing the experts needed to undertake the specialist assessments. This timescale and costings assumes that there are no appeals. No work on setting up the farm could begin until planning permission was given.</p> <p>Any loss of playing field space would also require Secretary of State permission.</p>
	Is it clear how the proposal will have a positive impact on the schools' financial income/increase pupil numbers?	<p>There is no detail in the proposal on how it will increase pupil numbers to allow greater financial income. A similar approach is already in place at a farm school in East Grinstead with pupils attending from across East Sussex, therefore there may not be further demand for this type of provision in East Sussex.</p> <p>There is no evidence that the majority of the local community that choose to send their children to other Lewes schools would support a Farm School by sending their children there instead.</p>

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Proposed Strategy

Key Priority from OFSTED Feb 2015	Proposal	Impact Evaluation Measurement tool	Timescale	Finance
Improve the quality of teaching to consistently good across the school.	Use a farm school curriculum that provides 'real' situations as a link to learning - e.g The 3 little Pigs for younger children. Curriculum plans to be developed alongside Sussex university. Enriched curriculum and outdoor learning to raise attendance and participation. Practical based curricular items to do with farm skills and traditional crafts (see other material) to be developed with the support of experts in these fields Regular coaching and lesson study for staff.	Teaching observations within the classroom Both peer evaluation and evaluation by senior staff to be used. Debriefing of experts in various fields to include gathering information about the ways in which new content for practical sessions has been absorbed and is being used by staff.	Full curriculum maps of the new practical farming based schemes of work to be drawn up by the start of the Autumn term 2016 and experts to support across these areas all in place. Inset sessions to bring staff together in preparation for the new curriculum to take place before the start of each term throughout the first academic year 2016-17 that these are being used. Aim for consistently good teaching across the school with all of the additional support being provided by Christmas 2016.	Farm set up using underspend of £38,000 from previous year's budget. Part of pupil premium funding to be used to bring in experts where there is a charge, small group sessions previously financed by this part of the funding now replaced by teacher training resource (see below). Coaching training - internal from staff training budget. Support from Sussex University PGCE programme not charged for as they are receiving the facility of a hub for their teacher training students.

<p>Set tasks that are demanding enough to help pupils to make good progress. Check pupils' learning frequently enough in lessons.</p>	<p>Small group focussed teaching provided as a base for Sussex University's PGCE teacher training programme. Small groups tracked closely to individual plans linked to small steps curriculum approach.</p>	<p>Assessment Information monitoring.</p>	<p>Programme to be developed over the school year 2016-17 and to be fully in place by the end of the school year</p>	<p>Farm set up using underspend of £38,000 from previous year's budget.</p> <p>Part of pupil premium funding to be used to bring in experts where there is a charge, small group sessions previously financed by this part of the funding now replaced by teacher training resource (see below).</p> <p>Coaching training - internal from staff training budget.</p> <p>Support from Sussex University PGCE programme not charged for as they are receiving the facility of a hub for their teacher training students.</p>
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Raise standards in KS1 so that attainment at the end of Key Stage 1 in reading, writing and mathematics are in line with National averages	Farm curriculum raises interest, participation and attendance. Community links improved and parents support learning. University focus input supports teaching and tracking so that targeted support is relevant and sustained.	Attendance and behaviour information. Assessment information	Pupils in the present year R in 2015-16 to show progress in line with National Averages by the end of KS1, pupils in the present Year 1 to show good progress towards this goal if not meeting it completely.	<p>Farm set up using underspend of £38,000 from previous year's budget.</p> <p>Part of pupil premium funding to be used to bring in experts where there is a charge, small group sessions previously financed by this part of the funding now replaced by teacher training resource (see below).</p> <p>Coaching training - internal from staff training budget.</p> <p>Support from Sussex University PGCE programme not charged for as they are receiving the facility of a hub for their teacher training students.</p>
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Strengthen progress in mathematics so that pupils are encouraged to explain how they are carrying out calculations and solving problems.	Real life farming based challenges eg food measures, costing necessitate depth of learning and reasoning. University input supports quality first teaching.	Assessment information	Programme to be developed over the school year 2016-17 and to be fully in place by the end of the school year	<p>Farm set up using underspend of £38,000 from previous year's budget.</p> <p>Part of pupil premium funding to be used to bring in experts where there is a charge, small group sessions previously financed by this part of the funding now replaced by teacher training resource (see below).</p> <p>Coaching training - internal from staff training budget.</p> <p>Support from Sussex University PGCE programme not charged for as they are receiving the facility of a hub for their teacher training students.</p>
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Ensure consistent good progress of groups of pupils, including the most able and those who are disadvantaged.	Enrichment activity linked to young farmers, small farm training groups, Plumpton agricultural college and smallholder magazine provide opportunity for both extension and support. Frequent opportunity for outside visits to places of interest which exemplify aspects of the practical based curriculum e.g. Mohair Centre (animal husbandry and spinning and weaving), Batemans (flour milling), High Weald Dairy (cheese making) etc	Assessment information	<p>Programme to be developed over the school year 2016-17 and to be fully in place by the end of the school year</p> <p>Careful monitoring against measurable and specific targets to be set up</p>	<p>Farm set up using underspend of £38,000 from previous year's budget.</p> <p>Part of pupil premium funding to be used to bring in experts where there is a charge, small group sessions previously financed by this part of the funding now replaced by teacher training resource (see below).</p> <p>Coaching training - internal from staff training budget.</p> <p>Support from Sussex University PGCE programme not charged for as they are receiving the facility of a hub for their teacher training students.</p>
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Ensure older pupils in mixed age classes are given work that is challenging enough	<p>Enrichment activity linked to young farmers, small farm training groups, Plumpton agricultural college and smallholder magazine provide opportunity for both extension and support. Frequent opportunity for outside visits to places of interest which exemplify aspects of the practical based curriculum e.g. Mohair Centre (animal husbandry and spinning and weaving), Batemans (flour milling), High Weald Dairy (cheese making) etc</p>	Assessment information	<p>Programme to be developed over the school year 2016-17 and to be fully in place by the end of the school year</p> <p>Careful monitoring against measurable and specific targets to be set up</p>	<p>Farm set up using underspend of £38,000 from previous year's budget.</p> <p>Part of pupil premium funding to be used to bring in experts where there is a charge, small group sessions previously financed by this part of the funding now replaced by teacher training resource (see below).</p> <p>Coaching training - internal from staff training budget.</p> <p>Support from Sussex University PGCE programme not charged for as they are receiving the facility of a hub for their teacher training students.</p>
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Ensure all pupils are able to use correct spelling, punctuation and grammar in their writing.	Small group work using university allows focus on acquiring, developing and embedding a culture of high expectation. Mentor work support Growth Mindset development to raise expectation and develop resilience.	Work scrutiny.	<p>Programme to be developed over the school year 2016-17 and to be fully in place by the end of the school year</p> <p>Careful monitoring against measurable and specific targets to be set up</p>	<p>Part of pupil premium funding to be used to bring in experts where there is a charge, small group sessions previously financed by this part of the funding now replaced by teacher training resource (see below).</p> <p>Coaching training - internal from staff training budget.</p> <p>Support from Sussex University PGCE programme not charged for as they are receiving the facility of a hub for their teacher training students.</p>
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Fundamental Changes

- Creation of farm school (possible funding from Harvey's).
- Involvement of Sussex University as a learning hub for the PGCE course - confirmed via Jo Tregenza (Director of ITE) - no cost
- Leadership involvement of experienced successful Headteacher - confirmed - no new cost
- Nurture provision focus - school budget
- Introduction of Growth Mindset philosophy - no cost
- Coaching provision for staff -some release costs - school budget.

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Summary of some of the main curriculum themes related to farming

For each month the main activities on a farm are listed and then school activities related to these with examples for pupils across the year groups. Each month a theme is taken in addition to the day to day practical work, and some festivals are listed that will be worked in to give an appreciation of British Values, the farming year and other cultures. Probable contacts for theme activities are listed with each month.

The school will have;

Horticulture/agriculture:

Orchard fruits

Soft Fruits

Cereals

Vegetables

Flowers

Animal husbandry:

Chickens

Ducks

Goats

Lambs

Looking after the plants and animals will be woven into the school day and used as the inspiration for all subject areas; here are a few brief examples from some subject areas:

English; descriptive, creative and for purpose writing

Mathematics; recording and analysing, practical business applications

Science; experimentation with horticulture and agriculture, recording, presenting information

PSHE and related areas; caring for and looking after animals and crops and the opportunities this gives to learn about development health, being part of a community

History; the way people lived in our area and beyond, different ways in which growing crops and looking after animals have changed over time

Geography: the sorts of agriculture and farming that are usual locally, across the UK and across the world

September

What a farm does:

- Harvesting of top fruit (apples, pears and plums) reaches its peak
- Harvesting of late varieties of soft fruit (raspberries and blackberries)
- Maize harvested to make into silage for winter feeding to cattle
- Topping starts - Ewes are mated with rams for spring lambing
- Autumn calving of dairy cows
- Spreading of farmyard manure onto farmland before autumn cultivations
- Autumn cultivations (ploughing, seedbed preparations, liming etc) and the sowing of arable crops (winter barley, oats and wheat) in full swing
- Local and county ploughing matches take place

Practical activity; Juice from fruit; contact Wobblegate Farm Bolney

Festival ; Autumn Equinox;

Some school activities:

Work to do with harvesting, both of the school crops and looking at what large farms do locally.

Practical work around juice. Juicing by hand, using a juicer. What can be created? Why extract juice from fruit. Visit a juice producer. Health and nutrition.

Ploughing; look at older and new methods; horse power and tractors. Visit and watch ploughing. Possible visit from Harveys Shire Horses to plough a small section of the school field.

Need for winter feed; why? Growing seasons. Fertiliser. Growth of seeds. Plant small scale items like cress to see seeds grow indoors.

October

What a farm does:

- Grape picking and wine making commences. There are several vineyards producing quality award-winning wine in the Chilterns region
- Autumn cultivations (ploughing, seedbed preparations, liming etc) and the sowing of arable crops (winter barley, oats and wheat) continue
- Summer grazed dairy and beef cows are housed for the winter and fed preserved crops (grass and maize silage) and supplementary concentrated feed
- Ewes are mated with rams for spring lambing
- Autumn calving of dairy cows

Practical activity; Flour milling; contact Batemans working mill
Baking contact Flint owl Bakery

Festival; Harvest festival, Folk dancing festival in Lewes

Some school activities

Work to do with harvesting, both of the school crops and looking at what large farms do locally.

Work on milling; why is it needed? Historical aspects. Relation to need for power, how is power generated. Wind and water power. Grinding by hand. Visit to a mill. Calculations about the amount of flour produced from grain, and bread from flour. Value added; business aspects. Industrial and artisan baking. Cook bread using yeast. The story of a grain of wheat from planting to harvesting to milling to baking to eating.

Harvest festival; reasons for this in the farm calendar. The modern harvest festival with tins and packets and its relationship to the original one. A time for giving; helping others in the community.

November

What a farm does:

- Autumn cultivations to prepare the ground for planting crops near completion
- Harvesting of winter vegetables (cauliflowers, beetroot, swede, parsnips and leeks)
- Summer grazed dairy and beef cows are housed for the winter and fed preserved crops (grass and maize silage) and supplementary concentrated feed
- Christmas trees are harvested

Vegetable harvesting; contact Ashurst Organics

Festivals; Remembrance; St Andrew's Day; Divali

Some school activities:

Looking at vegetables; different growing patterns above and below ground; harvesting; bringing in the crops at school and using for school dinners. Visit a farm locally that grows vegetables, compare this with the small scale production at school.

Christmas tree harvesting; look at a local producer. History of growing trees for Christmas; economics.

Other forestry in the area.

What are trees used for? Fires/power/furniture/building materials etc. Charcoal making.

Remembrance; why is this done, what is being done, history leading up to it.

December

What a farm does:

- Harvesting of winter vegetables (cauliflowers, beetroot, swede, parsnips and leeks)
- Turkeys and geese plucked in preparation for Christmas market.
- Conservation works take place such as planting, coppicing and laying of hedges; also work in farm woods, before the birds start nesting
- Farm maintenance of buildings, tracks, fences and machinery
- Holly and ivy gathering for Christmas decorations
- Fatstock shows are staged at major livestock markets

Conservation works; contact South Downs National Park

Festivals; Winter Solstice; Christmas

Some school activities:

Christmas preparations; turkeys, geese, vegetarian alternatives.
History of celebration of Christmas, from biblical teachings to Father Christmas in Coca Cola coloured robes.

Fatstock shows; why are these held. Animals as food.
Philosophical considerations about meat and vegetarians.
Different ways of looking at the world expressed by what people eat.

Learning about maintenance; farm structures to keep animals safe or prevent crops from being trampled.

Storage of crops and food, food safety.

January

What a farm does:

- Fruit trees are pruned to ensure a good crop later in the year
- Some flocks start lambing indoors to produce lamb ready for the traditional Easter market
- Conservation works take place such as planting, coppicing and laying of hedges; also work in farm woods, before the birds start nesting
- Farm maintenance of buildings, tracks, fences and machinery

Practical activity; Sussex Willow Weaving ; contact Dominic Porette

Festivals; New Year and Burns Night (Haggis with Neeps and Tatties)

Some school activities:

Learning about conservation works in Winter time. Why are woods coppiced; making things from coppiced willow. How to lay a hedge. Why is this done; why have a living boundary?

Plant and animal conservation within hedgerows. Birds and nests, how and why do they make them? Trying to make nests from natural materials in school; solving construction problems.

Burns Night meal with neeps and tatties from the school crops. Planning, preparing and enjoying together. Vegetarian alternative to Haggis for anyone who wants this!

February

What a farm does:

- Early lambing continues
- Orchard pruning continues
- Fungicide sprays are applied to crops showing signs of disease or organic methods used
- First top dressings of fertiliser are applied to winter sown arable crops
- Winter stubbles are ploughed and a seed bed is prepared for spring crops if the ground is dry enough

Practical Activity: Animal rescue; contact Sussex Wildlife

Festivals: Chinese New Year and Shrove Tuesday

Some school activities

Looking at why crops are treated for pests and how. Organic and chemical means. Life cycles, ecosystems, people using plants and animals for food. History of development of methods of agriculture designed to overcome pests.

Animal rescue locally; work of Sussex Wildlife and Trevor Weeks. What to do if you find an animal in need of help; why help?

How animals survive the winter and what they need, on farms and in the wild. Hibernation and sleep. Rhythms of nature.

Pancake making; why, how, history and culture. Science work with different kinds of batter to see which work and why. Make pancakes for the whole school for one meal.

March

What a farm does:

- Farmers continue planting spring cereal crops, barley, wheat and oats
- Main lambing season starts and housed ewes go out to grass
- Spring calving of dairy and beef cows
- Spring beef cattle sales held at livestock markets

Practical Activity: Lambing ; contact Mohair Centre

Festivals; Holi (end of winter in Hindu culture), St David's Day, St Patrick's Day, Easter (or April some years), Spring Equinox, Mother's Day.

Some school activities:

Lambing, birth, breeding animals; why and how at appropriate levels for the different age groups in school. Record births in a local flock over the spring. Twin births, orphan animals, keeping animals safe from predators.

Welsh and Irish national days and their Saints.

April

What a farm does:

- Fruit orchards begin to blossom
- Crop planting continues – maize, linseed, vining peas and game cover crops
- Turnout of winter housed dairy herds and beef cattle
- Grass and arable crops are fertilised

Practical Activity; Cheese making; contact High Weald Dairy

Festivals; St George's Day, Shakespeare's Birthday, Easter (some years)

Some school activities:

Signs of spring. Passage of the seasons. Scientific reasons for them and aesthetic appreciation.

Cheese making. Science and practical application. Research on the different kinds of cheese; soft, hard, blue etc, cheese made from different milks; cows/sheep/goats/buffalo. Try different cheeses. Include non-dairy cheese. Watch cheese being made, try the processes out, make cheese at school.

English national day and their Saint.

Shakespeare's birthday, whole school work on one of the plays at many different levels. Text, scenery, everything needed for a performance.

May

What a farm does:

- Fruit orchards in full blossom
- Oil seed rape in flower
- Arable crops are checked regularly for pests and disease and sprayed if required or organic methods used
- First silage of the year made from surplus grass to be fed to cattle over winter
- Sheep/goat shearing begins
- Early strawberries harvested
- Arable crops checked regularly for pests and disease and are sprayed if required or organic methods used
- Lambing season finishes

Practical activity: Sheep/goat shearing, weaving and spinning
contact Mohair Centre

Festivals: Mayday and Whitsun Morris Dancing : contacts Knots of May and Blackpowder Morris

Some school activities:

Flower to fruit; how this works. Bees as pollinators. Structure of flowers/fruit.

Oil seed rape; what is it, why is it grown? Food/fodder/fuel crops and how and why they are chosen. Modern and traditional crops. Looking at profit/conservation considerations.

Sheep/goat shearing; how, why, history. What is the fleece used for? Making things with fleece; felting, spinning, weaving, knitting.

Watch May day festivities and try to take part in Whitsun Morris dancing.

June

What a farm does:

- Salad vegetables and soft fruit harvested (cherries, gooseberries and strawberries)
- Hay making in full swing
- Second grass silage cut of the year taken
- Sheep shearing continues
- Dairy and beef cows mated now for calving in the spring

Jam Making; contact Ouse Valley Foods

Festivals; Queen's official birthday, Father's Day, Summer Solstice

Some school activities:

Why make jam? Food preservation. Sugar/heat/chemicals/irradiation. Simple and complicated ingredients. "E" numbers. reading food labels. Allergens.

Make jam from school fruit for all children to take home. If any leftover consider selling this for charity/to invest in more fruit plants/? Children to think about this and decide.

Harvest salad vegetables from school garden for meals.

Visit a farm to watch hay making. Why is it done? Traditional and newer methods. What is good and bad about them?

July

What a farm does:

- Harvesting of winter sown arable crops (oil seed rape, barley and wheat) commences using combine harvesters
- Grain is taken from the fields to the farm by trailer
- Baling of crop residues (mainly straw) starts
- Harvesting of soft fruit continues (raspberries, cherries, blueberries and black/redcurrants)

Practical activity: Harvesting; contact Spring Barn Farm

Festivals: Eid al-Fitr; Welsh Eisteddfod

Some school activities

Harvesting school crops.

Find out about combine harvesters.

History of farm machinery. Possible session driving a tractor for older pupils.

(August

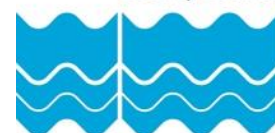
- Harvesting of arable crops reaches its peak
- Straw is transported to livestock farms to be used for winter bedding and feeding
- Early cultivations (ploughing, seedbed cultivations, liming etc) and sowing of arable crops begins
- Third cuts of grass silage taken (depending on how well grass has grown))

Equality Impact Assessment Chart: Proposed closure of Pells Church of England Primary School with effect from 31 August 2017

This summary chart shows the risks that have been identified through the EQIA and the mitigation in place to manage these risks.

Protected Characteristics Potential negative impact	Potential legal challenge and reputational damage to Council	Mitigation	Accepted Risks
Age Reception class – Year 4 pupils currently at the school plus reception pupils on roll due to start September 2016 will be disproportionately affected by this proposal, The Local Authority believes there will be sufficient places available in other schools in Lewes in 2017/18 for children from Pells CE Primary School were it to close, although a small shortfall of places is expected in Years 3 and 4.	Closing the school is likely to be unpopular with parent/carers, staff, pupils and the local community.	All Local Authorities have a statutory duty to offer all children aged 5 to 16 full-time education. Pupils across the different age ranges will be offered alternative Primary School provision and transition support. If at any point in the future shortfalls were to appear imminent this would be addressed through working with the other schools in the town. The Lewes Co-operative Trust has already indicated a willingness for schools to exceed PAN if necessary to ensure every child has a place.	Some schools may have to exceed PAN for a short period of time (a few years).
Disability Data indicates that children with SEND are significantly over represented at the Pells. There may be a short term negative impact caused by disruption to children who move schools.	Placement changes can be much more difficult for SEND pupils and is likely to be very unpopular with parents/carers, staff, pupils and the community.	Should the proposal be implemented the Local Authority would work with pupils, their parents and the relevant schools to make appropriate transition arrangements for pupils. Relevant families would be consulted about any specific potential impacts on individuals; for instance, because of loss of support networks or the need to replicate reasonable adjustments made to accommodate disabled children, and we would ensure that appropriate individual arrangements are made where this is necessary to avoid potential adverse impacts. The proposed closure will have a positive impact on the educational outcomes of all children including those pupils with SEN and in the Ever6FSM cohort. Children who start at a similar level in other schools make better progress.	Some short term disruption to a small number of pupils with SEN.

Protected Characteristics Potential negative impact	Potential legal challenge and reputational damage to Council	Mitigation	Accepted Risks
Religion, belief The Diocese will lose a church school from the town and this could reduce choices for parents if they cannot gain a place at one of the other church schools.	Closing the school is likely to be unpopular with parent/carers, staff, pupils and the local community.	<p>There are other schools in the local area with a Christian character that parents can apply for a place to. These schools currently have places available.</p> <p>It might be possible to use capital receipts from the Pells CE Primary School land to improve provision at another church school in Lewes.</p>	<p>Further exploration would be required with the Diocese about the determination of any capital receipts from the Pells CE Primary School land. At this point there is no guarantee that this can happen.</p>
Other: Socio Economic The school has a significantly higher % of pupils eligible for free school meals and pupil premium grant. Only 17 of the pupils currently at the school are not in the Ever6FSM or SEN cohort. There may be a short term negative impact caused by disruption to children who move schools. Relocating to another school may incur additional transport costs and change of uniform costs.	Closing the school is likely to be unpopular with parent/carers, staff, pupils and the local community.	<p>Should the proposal be implemented the Local Authority would work with pupils, their parents and the relevant schools to make appropriate transition arrangements for pupils. Relevant families would be consulted about any specific potential impacts on individuals; and we would ensure that appropriate individual arrangements are made where this is necessary to avoid potential adverse impacts.</p> <p>Free transport would be provided to eligible children.</p> <p>There is no uniform grant from the Local Authority however many schools make special arrangements for pupils entitled to Free School Meals.</p> <p>The proposed closure will have a positive impact on the educational outcomes of all children including those pupils with SEN and in the Ever6FSM cohort. Children who start at a similar level in other schools make better progress.</p>	<p>Some costs associated with new uniform and increased travel may be incurred by parents.</p> <p>Some short term disruption to a number of pupils from low socio-economic backgrounds.</p>



Equality Impact Assessment

Project or Service Template

Name of the proposal, project or service
Proposed closure of Pells CE Primary School

File ref:	Pells	Issue No:	1
Date of Issue:	May 2016	Review date:	October 2016

Contents

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Part 1 – The Public Sector Equality Duty and Equality Impact Assessments (EIA)

1.1 The Council must have due regard to its Public Sector Equality Duty when making all decisions at member and officer level. An EIA is the best method by which the Council can determine the impact of a proposal on equalities, particularly for major decisions. However, the level of analysis should be proportionate to the relevance of the duty to the service or decision.

1.2 This is one of two forms that the County Council uses for Equality Impact Assessments, both of which are available on the intranet. This form is designed for any proposal, project or service. The other form looks at services or projects.

1.3 The Public Sector Equality Duty (PSED)

The public sector duty is set out at Section 149 of the Equality Act 2010. It requires the Council, when exercising its functions, to have “due regard” to the need to

- Eliminate discrimination, harassment, victimisation and any other conduct that is prohibited under the Act.
- Advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it;
- Foster good relations between persons who share a relevant protected characteristic and persons who do not share it. (see below for “protected characteristics”

These are sometimes called equality aims.

1.4 A “protected characteristic” is defined in the Act as:

- age;
- disability;
- gender reassignment;
- pregnancy and maternity;
- race (including ethnic or national origins, colour or nationality)
- religion or belief;
- sex;
- sexual orientation.

Marriage and civil partnership are also a protected characteristic for the purposes of the duty to eliminate discrimination.

The previous public sector equalities duties only covered race, disability and gender.

1.5 East Sussex County Council also considers the following additional groups/factors when carry out analysis:

- Carers – A carer spends a significant proportion of their life providing unpaid support to family or potentially friends. This could be caring for a relative, partner or friend who is ill, frail, disabled or has mental health or substance misuse problems. [Carers at the Heart of 21st Century Families and Communities, 2008]
- Literacy/Numeracy Skills

- Part time workers
- Rurality

1.6 Advancing equality (the second of the equality aims) involves:

- Removing or minimising disadvantages suffered by people due to their protected characteristic
- Taking steps to meet the needs of people from protected groups where these are different from the needs of other people including steps to take account of disabled people's disabilities
- Encouraging people from protected groups to participate in public life or in other activities where their participation is disproportionately low

NB Please note that, for disabled persons, the Council must have regard to the possible need for steps that amount to positive discrimination, to "level the playing field" with non-disabled persons, e.g. in accessing services through dedicated car parking spaces.

1.6 Guidance on Compliance with The Public Sector Equality Duty (PSED) for officers and decision makers:

1.6.1 To comply with the duty, the Council must have "due regard" to the three equality aims set out above. This means the PSED must be considered as a factor to consider alongside other relevant factors such as budgetary, economic and practical factors.

1.6.2 What regard is "due" in any given case will depend on the circumstances. A proposal which, if implemented, would have particularly negative or widespread effects on (say) women, or the elderly, or people of a particular ethnic group would require officers and members to give considerable regard to the equalities aims. A proposal which had limited differential or discriminatory effect will probably require less regard.

1.6.3 Some key points to note :

- The duty is regarded by the Courts as being very important.
- Officers and members must be aware of the duty and give it conscious consideration: e.g. by considering open-mindedly the EIA and its findings when making a decision. When members are taking a decision, this duty can't be delegated by the members, e.g. to an officer.
- EIAs must be evidence based.
- There must be an assessment of the practical impact of decisions on equalities, measures to avoid or mitigate negative impact and their effectiveness.
- There must be compliance with the duty when proposals are being formulated by officers and by members in taking decisions: the Council can't rely on an EIA produced after the decision is made.
- The duty is ongoing: EIA's should be developed over time and there should be evidence of monitoring impact after the decision.
- The duty is not, however, to achieve the three equality aims but to consider them – the duty does not stop tough decisions sometimes being made.

- The decision maker may take into account other countervailing (i.e. opposing) factors that may objectively justify taking a decision which has negative impact on equalities (for instance, cost factors)

1.6.4 In addition to the Act, the Council is required to comply with any statutory Code of Practice issued by the Equality and Human Rights Commission. New Codes of Practice under the new Act have yet to be published. However, Codes of Practice issued under the previous legislation remain relevant and the Equality and Human Rights Commission has also published guidance on the new public sector equality duty.

Part 2 – Aims and implementation of the proposal, project or service

2.1 What is being assessed?

a) Proposal or name of the project or service.

Proposed closure of Pells CE Primary School with effect from 31 August 2017

b) What is the main purpose or aims of proposal, project or service?

The Proposal is to close Pells CE Primary School.

It is the local authority's duty to ensure that there are sufficient places across the county to accommodate all pupils of statutory school age. The local authority must also consider its duty to promote high education standards, ensure fair access to educational opportunity and promote the fulfilment of every child's educational potential with the aim of enabling children to take up a school place within their local community.

In October 2014 the Lead Member agreed that a review of primary schools should be undertaken in the Lewes area. The area review raised significant concerns about the long term sustainability of Pells CE Primary School in terms of the risks to its financial stability, securing good outcomes for pupils and its ability to attract pupils from within its community area. The school received a second 'requires improvement' Ofsted grade in February 2015 and it is highly likely that the school will not be judged good or better at the next inspection. As the school has been judged 'Requires Improvement' twice in a row, Ofsted is likely to consider placing the school in a category of concern as a third 'Requires Improvement' outcome would indicate that the pace of improvement has not been swift enough to address pupil underachievement.

For these reasons and having considered alternative options including federation, amalgamation and academisation, the Lead Member for Education and Inclusion, Special Educational Needs and Disability on 21 March 2016 gave approval for the local authority to consult on the proposed closure of Pells CE Primary School.

If approved the proposal will result in the closure of Pells CE Primary School and arrangements would be made for parents/carers to apply for a place at an alternative school in the local area.

d) Manager(s) and section or service responsible for completing the assessment

Gary Langford, Place Planning Manager, Standards and Learning Effectiveness Service

The Equality Impact Assessment was contributed to by the relevant local authority officers.

2.2 Who is affected by the proposal, project or service? Who is it intended to benefit and how?

Children and their families, staff and the local community.

The local authority has a moral and legal duty to ensure pupils receive a good standard of education. It is a matter of significant concern that the provision for the pupils at Pells CE Primary School does not enable them to make expected levels of progress by the time they leave Year 6. The attainment of pupils in Year 6 has been below the national average for the past three years. Children who start at a similar level in other schools make better progress. The local authority has a responsibility to ensure that we have the same level of ambition for children at Pells CE Primary School.

The local authority's pupil forecasts for Lewes indicate that the number of places available in the town if Pells CE Primary School were to close will be sufficient to meet future demand for places. The latest set of pupil forecasts for Lewes, which take account of the proposed large developments at North Street and Old Malling Farm indicate that primary reception year intakes will fall in the period to 2018/19 before rising again in the period to 2025/26. However even at its peak intake numbers are expected to be below 200. Beyond 2025/26 the local authority's demographic based forecasts indicate that reception year intakes will begin to fall away again.

All pupils attending the school would be offered an alternative place at another school. Generally the local authority anticipates that there will be sufficient places available in other schools in Lewes for children from Pells CE Primary School were it to close, although a short term shortfall of places is expected in Years 3 and 4. This would be addressed through working with the other schools in the town. The Lewes Co-operative Trust has already indicated a willingness for schools to exceed their Pupil Admission Number (PAN) if necessary to ensure every child has a place.

Asking schools to exceed PAN is a strategy adopted in other parts of the county where there is pressure on places but the level of demand does not justify the creation of bulge classes. Forecasts indicate that this strategy would only need to be in place for a short period until the larger cohorts in Years 3 and 4 leave the primary phase. It should be noted that there is no class size legislation in Key Stage 2 which limits class sizes to 30.

Should the current proposals be implemented, the local authority would work with the current members of staff, including teaching and support staff in line with the Council's 'Managing Change Policy'.

2.3 How is, or will, the proposal, project or service be put into practice and who is, or will be, responsible for it?

The East Sussex County Council Cabinet is responsible for making the final decision on the proposal. If approved, the school would close by 31 August 2017.

The local authority will be responsible for overseeing the process of the closure of the school. The local authority will work closely with the school in implementing the closure, including supporting pupils in 2016/17 and their transition to a new school. The local authority admission's team will work closely with other schools in the town to ensure that every pupil is offered a school place.

2.4 Are there any partners involved? E.g. NHS Trust, voluntary/community organisations, the private sector? If yes, how are partners involved?

Pells CE Primary School is a Voluntary Controlled school. The Diocese of Chichester shares our concerns about the long term sustainability of Pells CE Primary School in terms of the risks to its financial stability, securing good outcomes for pupils, its ability to attract pupils from within its community area and that it is highly likely the school will not be judged good or better at the next Ofsted inspection. The Diocese agreed that the local authority should consult with key stakeholders about the proposed closure of the school.

2.5 Is this proposal, project or service affected by legislation, legislative change, service review or strategic planning activity?

Proposals for closure have to follow a prescribed process established by the Education and Inspections Act 2006 (EIA 2006) as up dated by the Education Act 2011 and the School Organisation (Establishment and Discontinuance of Schools) (England) Regulations 2013.

Background documents:

Report to the Lead Member for Education and Inclusion, Special Educational Needs and Disability on 21 March 2016:

<https://esmodern.gov01v/ieListDocuments.aspx?CId=456&MId=2867&Ver=4>

2.6 How do people access or how are people referred to your proposal, project or service? Please explain fully.

If the school were to close arrangements would be made for parents/carers to apply for a place at an alternative school in the local area. Parents/carers would be asked to complete an admissions application form and to name up to three schools they would like their child/ren to attend. Parents/carers would be offered a school place for their child/ren, either at one of their preferred schools named on the application form, or if this is not possible, at the nearest school to the child's home where a place is available. It should be noted that parents have a right to express a preference for a school, not to choose which school their child/ren attend.

The Council will try to meet parents/carers' preferences wherever possible but cannot guarantee to do so. The allocation of places will be made in line with the admissions policy as set out in the school admissions booklet which is available on the East Sussex website:

<https://new.eastsussex.gov.uk/educationandlearning/schools/admissions/>

2.7 If there is a referral method how are people assessed to use the proposal, project or service? Please explain fully.

N/A

2.8 How, when and where is your proposal, project or service provided? Please explain fully.

As referred to in 2.5 above, the local authority must follow a prescribed process in proposing closure of a school. It cannot shorten the process. The proposed date

for closure of Pells CE Primary School is 31 August 2017. The local authority has a legal obligation to educate any child that wishes to remain at the school until the date of closure.

Part 3 – Methodology, consultation, data and research used to determine impact on protected characteristics.

3.1 List all examples of quantitative and qualitative data or any consultation information available that will enable the impact assessment to be undertaken.

Types of evidence identified as relevant have X marked against them			
	Employee Monitoring Data		Staff Surveys
X	Service User Data		Contract/Supplier Monitoring Data
X	Recent Local Consultations		Data from other agencies, e.g. Police, Health, Fire and Rescue Services, third sector
	Complaints		Risk Assessments
	Service User Surveys	X	Research Findings
X	Census Data	X	East Sussex Demographics
	Previous Equality Impact Assessments		National Reports
	Other organisations Equality Impact Assessments		Any other evidence?

3.2 Evidence of complaints against the proposal, project or service on grounds of discrimination.

The consultation responses demonstrate that the majority of parents, pupils, staff, and the local community are against the proposed closure. A number of respondents have cited the impact on the proposals on individual pupils, including those with Special Educational Needs and other vulnerabilities. Some respondents have also cited that the closure of the school will lead to less choice for parents who wish to send their pupils to a faith school. A summary of the responses and the local authority's response is provided in Section 7 of the Consultation Report at **Appendix A**.

3.3 If you carried out any consultation or research on the proposal, project or service explain what consultation has been carried out.

In October 2014 the Lead Member agreed that a review of primary schools should be undertaken in the Lewes area. The area review process involved the preparation of data packs between autumn and spring 2015 and the holding of internal meetings with officers and diocesan colleagues in the spring and of stakeholder meetings in June 2015. Information and evidence from this review informed the decision to seek approval to consult on proposed closure of Pells CE Primary School. The Lewes Area Review Report is included as an Appendix to the Report to the Lead Member for Education and Inclusion, Special Educational Needs and Disability on 21 March 2016:

<http://esmoderngov01v/ieListDocuments.aspx?CId=456&MId=2867&Ver=4>

A six week public consultation on the proposed closure of Pells CE Primary School commenced on 15 April and ran until 27 May 2016. Hard copies of the Local Authority's consultation document were distributed to 920 key stakeholders and interested parties which included pupils, parents and carers, staff other local

schools, trade unions, the District Council and Parish Councils, the local MP, the Church of England and Catholic Dioceses and the wider local community.

The consultation document was also available on the ESCC website at: https://consultation.eastsussex.gov.uk/consultation_finder

A meeting was held with school staff and their union representatives on 21 April 2016 to provide the opportunity for officers to provide more detail about the proposal and for those attending to ask questions and raise concerns. Notes were taken at this meeting and a Question and Answer (Q&A) document was prepared and sent to the headteacher to distribute to staff.

A public meeting was held at Pells CE Primary School on the 4 May 2016 to provide more detail about the proposal and enable parents, carers and all interested parties to ask questions and raise concerns. Notes were taken at this meeting and a Q&A document responding to the key issues raised was produced and posted on the local authority's website for people to view. This can be viewed in section 5 of the Consultation Report attached at **Appendix A**.

The children of Pells CE Primary School were encouraged to express their views. These were gathered by the Head of School and submitted by email. The feedback received from pupils can be viewed in Section 6 of the Consultation Report attached at **Appendix A**.

Consultation Responses 104 consultation responses were received during the consultation period of which 43 were completed on line and 61 forms were returned via freepost. In addition

- 1 letter was received
- 4 emails were received.

Where known the following stakeholders responded to the consultation

- 22 parents / carers of a child at Pells CE Primary School
- 3 pupils at Pells CE Primary School
- 4 members of staff at Pells CE Primary School
- 5 members of the governing body at Pells CE Primary School
- 46 members of the local community
- 23 other (Home educating parent, parents of children at local schools, teacher at local school, governor at a local school, retired teachers, local town and district councillor, local MP, local town and district councillor, parent of past pupil, prospective parent, Grandparent, local resident and past resident of Lewes, local business, 'just wanting to save our schools')
- 1 Not answered

During the consultation period a 5,000+ signature petition in relation to the proposed closures of both Pells CE Primary and Rodmell CE Primary School was submitted to the Local Authority. Petitions must be considered in the light of DfE guidance and the greatest weight should be given to representations from those stakeholders most likely to be directly affected by the proposals rather than simply taking account of the numbers of people expressing a particular view. The petition does not identify each signatory's relationship to the school and therefore it is difficult to assess whether the opinions are those of stakeholders that should be given the greatest consideration. The petition is available for members to view.

The petition was presented at Full Council on 10 May 2016 where the following motion was moved.

In view of the increasing need for Primary School places in and around Lewes in the next five years, the strength of public feeling shown by a petition of over 5,000 signatories and the emerging plans for the future at both Rodmell School and Pells School, the Council recommends to Cabinet that the process towards the closure of these two schools is halted at the end of the consultation to enable these plans to be put into place

A recorded vote on the motion was requested and taken. The motion was carried, the votes being cast as follows - 28 for the motion and 20 against the motion.

3.4 What does the consultation, research and/or data indicate about the positive or negative impact of the proposal, project or service?

A number of the consultation responses raise concerns about the impact of the proposed closure on specific pupils at the school, including those that are more vulnerable because they have Special Educational Needs. Respondents stated that they like the fact that Pells CE Primary School is a small school with good links to the local community.

The Local Authority recognises that the closure of this small school will impact on specific children who will be required to move schools, those families that have chosen the school because of its small size and families who have opted for a faith education (Church of England).

Looking at the school data we can see that children with Special Educational Needs (SEN) and eligible for Free School Meals (FSM) are significantly over represented at the school and as such will be disproportionately affected by the proposal. However, data showing the outcomes for pupils with Special Educational Needs (SEN), and those who have been eligible for Free School Meals at any point in the last six years (Ever 6 FSM), shows that outcomes for these pupils at other schools in the town are better.

Data on outcomes shows that in the last two years (2014 and 2015) no SEN pupils have achieved Level 4+ for reading/writing/maths at Pells CE Primary School. Other schools in the town have a higher % of SEN pupils achieving this outcome. Pells CE Primary School had the largest gap between SEN and non SEN pupils of all schools in the town in both 2014 and 2015 for this outcome.

Data on outcomes for the Ever 6 FSM cohort shows that in 2015 Pells CE Primary School had the lowest % of pupils from this cohort who achieved Level 4+ for reading/writing/maths, and the largest gap between Ever 6 FSM and non Ever 6 FSM pupils of all schools in Lewes. In 2014 the school had the 3rd highest gap between Ever 6 FSM and non Ever 6 FSM pupils of the 9 schools in the Lewes for this outcome.

It is therefore considered that there will be a positive impact as a result of this proposal on the educational outcomes of these groups.

Part 4 – Assessment of impact

4.1 Age: Testing of disproportionate, negative, neutral or positive impact.

a) How is this protected characteristic reflected in the County/District/Borough?

In East Sussex there are 37,389 primary age children attending 152 primary schools. In the Lewes District there are 6,855 primary age children attending 28 primary schools. Pells CE Primary School has 90 pupils on roll, this equates to 1.31% of the total primary age population in Lewes District and 0.24% of the county total (source: January 2016 census).

The school struggles to meet its pupil admission number as shown in the table below. For the last five years the school has consistently had a surplus capacity of more than 30% and at the January 2016 census the school had 90 pupils against a capacity of 140 - a 35% surplus of places, 50 unfilled places.

	2012/13		2013/14		2014/15		2015/16		2016/17	
Published Admission Number (PAN)	1st Prefs	% 1st Prefs Above/ Below PAN	1st Prefs	% 1st Prefs Above/ Below PAN	1st Prefs	% 1st Prefs Above/ Below PAN	1st Prefs	% 1st Prefs Above/ Below PAN	1st Prefs	% 1st Prefs Above/ Below PAN
20	7	-65%	6	-70%	9	-55%	11	-45%	9	-55%

b) How is this protected characteristic reflected in the population of those impacted by the proposal, project or service?

The proposal will predominantly affect children of primary school age whose families chose to send their children to the school.

Will people with the protected characteristic be more affected by the proposal, project or service than those in the general population who do not share that protected characteristic?

The proposal will disproportionately affect children of primary school age in the local community whose families chose to send their children to the school.

c) What is the proposal, project or service's impact on different ages/age groups?

The proposal is only likely to impact on the current years up to Year four and the reception intake in September 2016. It does not affect years 5 and 6 and does not affect secondary age children in the town.

d) What actions are to/or will be taken to avoid any negative impact or to better advance equality?

All local authorities have a statutory duty to offer all children aged 5 to 16 full-time education. Pupils at the school will be offered a place at another school in the town.

As set out in 2.2 above the Local Authority anticipates that the number of reception year places available in Lewes (assuming Pells CE Primary School closes in August 2017) will be sufficient to meet future demand for places. A short

term shortfall of places is expected in Years 3 and 4 and this would be addressed through working with the other schools in the town to ensure every pupil is offered a place. This may mean that some class sizes in other schools exceed 30.

The local authority has a moral and legal duty to ensure pupils receive a good standard of education. It is a matter of significant concern that the provision for the pupils at Pells CE Primary School does not enable them to make expected levels of progress by the time they leave Year 6. The attainment of pupils in Year 6 has been below the national average for the past three years. Children who start at a similar level in other schools make better progress. The local authority has a responsibility to ensure that we have the same level of ambition for children at Pells CE Primary School. This will better advance equality of the children who currently attend Pells CE Primary School.

e) Provide details of the mitigation.

Mitigation is in place to ensure that all pupils will be offered a place at another school. Asking schools to exceed PAN is a strategy adopted in other parts of the county where there is pressure on places but the level of demand does not justify the creation of bulge classes. Forecasts indicate that this strategy would only need to be in place for a relatively short period of time until the larger cohorts leave the primary phase. It should be noted that there is no class size legislation in Key Stage 2 which limits class sizes to 30 pupils.

Free transport would be provided to eligible children if appropriate.

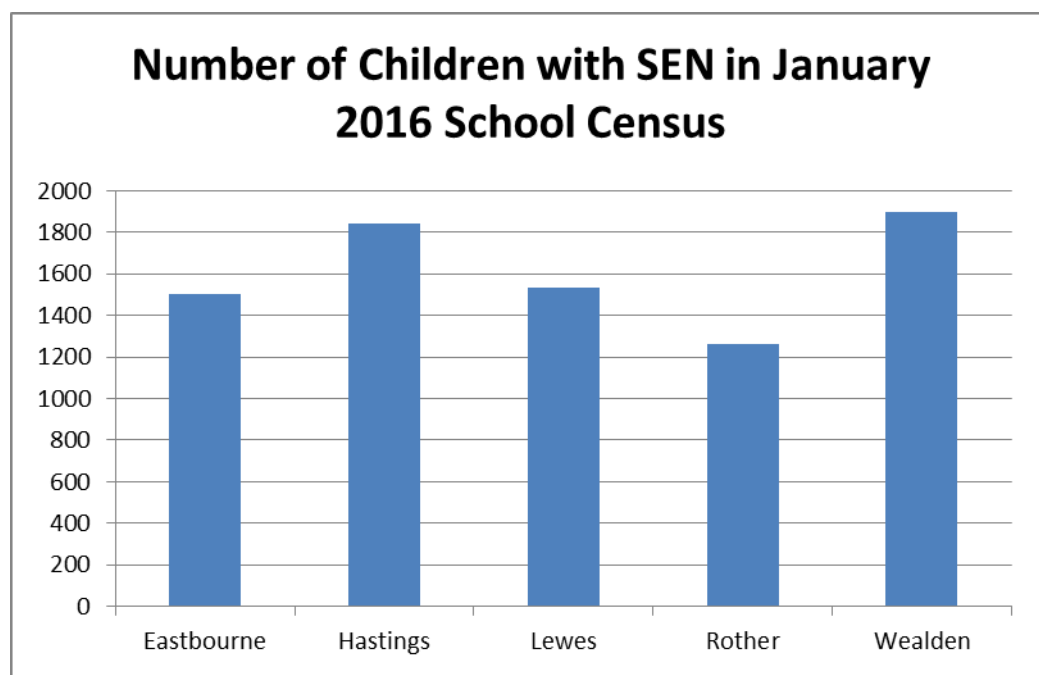
f) How will any mitigation measures be monitored?

The Council regularly reviews its pupil forecasts to ensure there are sufficient school places to meet demand and if necessary takes action to address any shortfalls in places in line with its statutory responsibilities.

4.2 Disability: Testing of disproportionate, negative, neutral or positive impact.

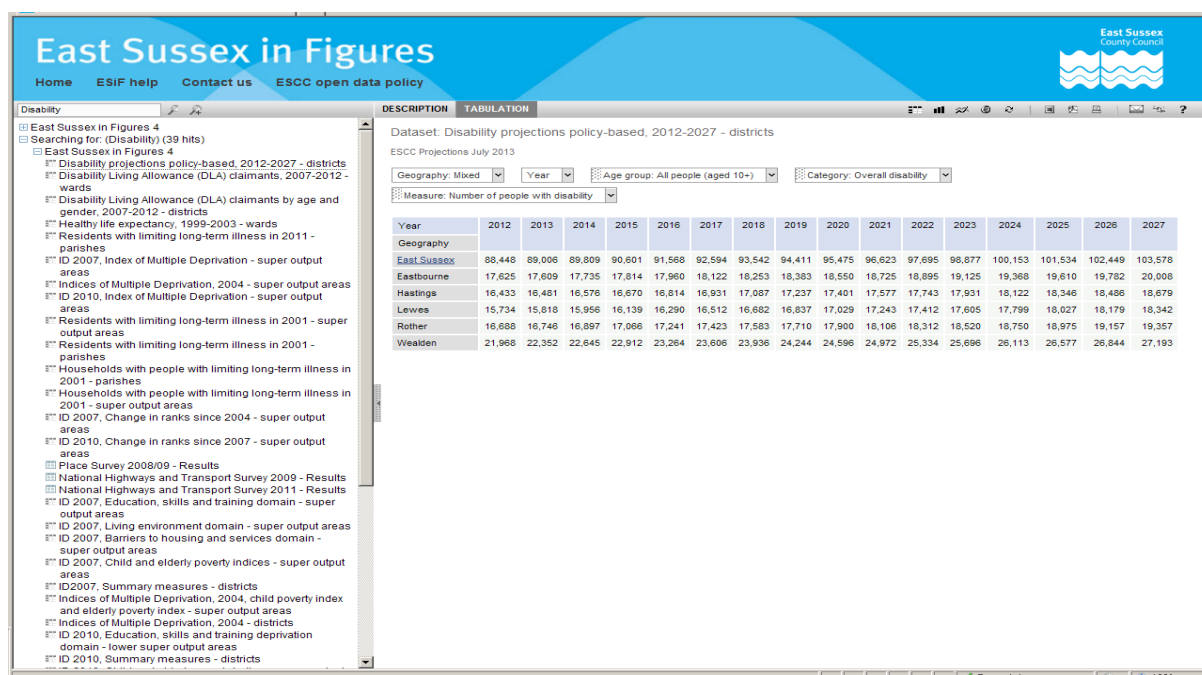
a) How is this protected characteristic reflected in the County /District/Borough?

The following chart shows the number of children recorded as having Special Educational Needs (SEN) in the January 2016 school census (children attending East Sussex maintained primary schools and academies). District/ Borough information relates to the pupil's home address as reported in the January 2016 school census.



In East Sussex there were 8,042 children recorded as having Special Educational Needs in the January 2016 school census. The figure for Lewes District was 1,536.

Disability projections published on East Sussex in Figures (ESiF) in July 2013 put the total number of people with a disability in East Sussex at 89,006 for 2013. The figure for Lewes District is 15,818.



b) How is this protected characteristic reflected in the population of those impacted by the proposal, project or service?

The current SEN data for Pells CE Primary School shows that the percentage of SEN pupils at the school is **30.0% (27 out of 90)**. This is significantly higher in comparison to the % average in East Sussex schools of **12.8%**

c) Will people with the protected characteristic be more affected by the proposal, project or service than those in the general population who do not share that protected characteristic?

The data indicates that Pells CE Primary School is significantly overrepresented by pupils with this characteristic.

d) What is the proposal, project or service's impact on people who have a disability?

Considering the data children with SEN could potentially be disproportionately affected by the proposal. However, data on pupil outcomes show that this cohort of pupils achieve better at other schools in the town. This leads us to believe that there will be a positive impact on this proposal on the educational outcomes of this cohort.

e) What actions are to/ or will be taken to avoid any negative impact or to better advance equality?

Pells CE Primary School is a mainstream school. There is no specific provision on the site that is recognised by the local authority as reserved for pupils with SEN. All mainstream schools are required to meet the individual needs of all their pupils including those with SEN and disability. All schools in the area want all children to thrive and have access to a range of support to help with their needs. This would be the case for children moving from Pells CE Primary School and all schools would be expected to provide the same level of care as that provided at Pells CE Primary School. Outcomes for children with similar needs are better in other schools.

Provide details of any mitigation.

Should the proposal to close Pells CE Primary School be approved the Local Authority would work closely with receiving schools to ensure appropriate transition arrangements would be made so that any potential adverse impacts on pupils affected would be mitigated.

The Local Authority and affected schools have a duty to support appropriate transition arrangements and the Council would take all practical steps to ease the transition for pupils, most especially for vulnerable learners and those with SEN. Were Pells CE Primary School to close the Local Authority is confident that teaching staff at other schools would manage the transition of any pupils to their new school. These circumstances are not unusual in that schools regularly manage in-year admissions, though it is recognised that there will be a significant number of pupils making the transition at any one time, including a number of pupils with SEN. Therefore additional support will be in place for the transition arrangements as detailed below.

Should the proposal be implemented the Local Authority would work with pupils, their parents and the relevant schools to make appropriate transition arrangements for pupils. Relevant families would be consulted about any specific potential impacts on individuals; for instance, because of loss of support networks or the need to replicate reasonable adjustments made to accommodate disabled children, and we would ensure that appropriate individual arrangements are made where this is necessary to avoid potential adverse impacts. Transfer to a larger school could potentially provide more flexibility of resource to support pupil's needs.

f) How will any mitigation measures be monitored?

The local authority will closely monitor the transition of the pupils to their new schools through regular monitoring arrangements already in place.

All schools have to report on the outcomes of all pupils, including those with SEN. The Local Authority will continue to monitor regularly the outcomes at all schools for these pupils.

4.3 Ethnicity: Testing of disproportionate, negative, neutral or positive impact. Race categories are: Colour. E.g. being black or white, Nationality e.g. being a British, Australian or Swiss citizen, Ethnic or national origins e.g. being from a Roma background or of Chinese Heritage

a) How is this protected characteristic reflected in the County /District/Borough?

The vast majority of pupils (86.7%) according to the January 2016 school census are of White British Heritage. This is broadly in line with that of the population across the County based on the 2011 census. 10.2% of Lewes district's school population is Black and Minority Ethnic (BME). Of the 84 pupils attending Pells CE Primary School where ethnicity is known, 7.1% (1 in 14 pupils) are from ethnic minority backgrounds.

Data for Pells CE Primary School indicates that the percentage of pupils with English as an Additional Language (EAL) is 1.3% (years 1-6). This is lower than the East Sussex overall of 5.5%.

b) How is this protected characteristic reflected in the population of those impacted by the proposal, project or service?

BME children are not over represented at Pells CE Primary School and as such will not be disproportionately affected by the proposal

c) Will people with the protected characteristic be more affected by the proposal, project or service than those in the general population who do not share that protected characteristic?

We do not believe that people with the protected characteristic will be more affected by the proposal than those in the general population who do not share that protected characteristic.

- d) **What is the proposal, project or service's impact on those who are from different ethnic backgrounds?**

N/A

- e) **What actions are to/ or will be taken to avoid any negative impact or to better advance equality?**

N/A

- f) **Provide details of any mitigation.**

N/A

- g) **How will any mitigation measures be monitored?**

N/A

4.4 **Gender/Transgender: Testing of disproportionate, negative, neutral or positive impact**

- a) **How is this protected characteristic target group reflected in the County/District/Borough?**

The percentage of pupils attending the school who are male is **46.7%** and female **53.3%**. This compares to the East Sussex figures of male **51.5%** and female **48.5%**.

Should the current proposals be implemented, the Local Authority would work with the current members of staff, including teaching and support staff in line with the Council's 'Managing Change Policy'.

How is this protected characteristic reflected in the population of those impacted by the proposal, project or service?

The following chart shows the gender breakdown of Pells CE Primary School by class

Class	Year Groups	Numbers		%	
		F	M	F	M
Robins	R	6	8	42.9	57.1
Kingfisher	1 & 2	15	7	68.2	31.8
Woodpecker	3 & 4	11	15	42.3	57.7
Puffins	5 & 6	16	12	57.1	42.9

- b) **Will people with the protected characteristic be more affected by the proposal, project or service than those in the general population who do not share that protected characteristic?**

We do not believe that people with the protected characteristic will be more affected by the proposal than those in the general population who do not share that protected characteristic.

- c) **What is the proposal, project or service's impact on different genders?**

N/A

- d) **What actions are to/ or will be taken to avoid any negative impact or to better advance equality?**

N/A

- e) **Provide details of any mitigation.**

N/A

- f) **How will any mitigation measures be monitored?**

N/A

4.5 Marital Status/Civil Partnership: Testing of disproportionate, negative, neutral or positive impact.

- a) **How is this protected characteristic target group reflected in the County/District/Borough?**

We do not consider marital status/civil partnership characteristics to be relevant to the proposal.

- b) **How is this protected characteristic reflected in the population of those impacted by the proposal, project or service?**

N/A

- c) **Will people with the protected characteristic be more affected by the proposal, project or service than those in the general population who do not share that protected characteristic?**

N/A

- d) **What is the proposal, project or service's impact on people who are married or same sex couples who have celebrated a civil partnership?**

N/A

- e) **What actions are to/ or will be taken to avoid any negative impact or to better advance equality?**

N/A

- f) **Provide details of any mitigation.**

N/A

- g) **How will any mitigation measures be monitored?**

N/A

4.6 Pregnancy and maternity: Testing of disproportionate, negative, neutral or positive impact.

a) How is this protected characteristic target group reflected in the County/District/Borough?

We do not consider pregnancy and maternity characteristics to be relevant to the proposal.

b) How is this protected characteristic reflected in the population of those impacted by the proposal, project or service?

N/A

c) Will people with the protected characteristic be more affected by the proposal, project or service than those in the general population who do not share that protected characteristic?

N/A

d) What is the proposal, project or service's impact on pregnant women and women within the first 26 weeks of maternity leave?

N/A

e) What actions are to/ or will be taken to avoid any negative impact or to better advance equality?

N/A

f) Provide details of the mitigation

N/A

g) How will any mitigation measures be monitored?

N/A

4.7 Religion, Belief: Testing of disproportionate, negative, neutral or positive impact.

a) How is this protected characteristic reflected in the County/District/Borough?

Pells CE Primary School is a Voluntary Controlled school. The following denominational schools are situated within the Lewes.

Iford & Kingston CE Primary School
Southover CE Primary School, Lewes
South Malling CE Primary School, Lewes
St Pancras Catholic Primary School, Lewes
Annecy Catholic Primary School, Seaford

b) How is this protected characteristic reflected in the population of those impacted by the proposal, project or service?

Pells CE Primary School is a Voluntary Controlled School. Voluntary Controlled schools are managed in the same way as community schools but have historically been linked to a church. The local authority is responsible for school admissions and decides how pupils are admitted in the same way as community schools.

c) Will people with the protected characteristic be more affected by the proposal, project or service than those in the general population who do not share that protected characteristic?

The proposal will predominantly affect children whose families chose to send their children to a denominational school.

d) What is the proposal, project or service's impact on the people with different religions and beliefs?

There are a number of other schools in the Lewes area which are Voluntary Controlled Church of England schools so we do not consider that the proposal will have a significant impact on this particular characteristic.

e) What actions are to/ or will be taken to avoid any negative impact or to better advance equality?

Should the proposed closure of the school be approved the school would remain open until 31 August 2017.

Were closure approved, arrangements would be made for parents/carers to apply for a place at an alternative school in the local area, including other denominational schools. Parents/carers would be asked to complete an admissions application form and to name up to three schools they would like their child/ren to attend. Parents/carers would be offered a school place for their child/ren, either at one of their preferred schools named on the application form, or if this is not possible, at the nearest school to the child's home where a place is available. It should be noted that parents have a right to express a preference for a school, not to choose which school their child/ren attend.

The Council will try to meet parents/carers' preferences wherever possible but cannot guarantee to do so. The allocation of places will be made in line with the admissions policy as set out in the school admissions booklet which is available on the East Sussex website

<https://new.eastsussex.gov.uk/educationandlearning/schools/admissions/>

f) Provide details of any mitigation.

Free transport would be provided to eligible children if appropriate.

g) How will any mitigation measures be monitored?

The Council regularly reviews its pupil forecasts to ensure there are sufficient school places to meet demand and if necessary takes action to address any shortfalls in places in line with its statutory responsibilities.

4.8 Sexual Orientation - Gay, Lesbian, Bisexual and Heterosexual: Testing of disproportionate, negative, neutral or positive impact.

a) How is this protected characteristic reflected in the County/District/Borough?

We do not consider sexual orientation characteristics to be relevant to the proposal.

b) How is this protected characteristic reflected in the population of those impacted by the proposal, project or service?

N/A

c) Will people with the protected characteristic be more affected by the proposal, project or service than those in the general population who do not share that protected characteristic?

N/A

d) What is the proposal, project or service's impact on people with differing sexual orientation?

N/A

e) What actions are to/ or will be taken to avoid any negative impact or to better advance equality?

N/A

f) Provide details of the mitigation

N/A

g) How will any mitigation measures be monitored?

N/A

4.9 Other: Additional groups/factors that may experience impacts - testing of disproportionate, negative, neutral or positive impact.

a) How are these groups/factors reflected in the County/District/Borough?

As at the January 2015 School Census, **60.9%** of Pells CE Primary School pupils are Ever6FSM in comparison to **24.2%** of all pupils in East Sussex maintained schools. A pupil who is described as 'Ever6FSM' means that within the last 6 years the pupil has at some point been eligible for receiving Free School Meals (FSM).

b) How is this group/factor reflected in the population of those impacted by the proposal, project or service?

The data indicates that there is a significant **overrepresentation** of Ever6FSM pupils at Pells CE Primary School.

c) Will people within these groups or affected by these factors be more affected by the proposal, project or service than those in the general population who are not in those groups or affected by these factors?

Children from poorer socio economic backgrounds will be disproportionately affected.

d) What is the proposal, project or service's impact on the factor or identified group?

Data on pupil outcomes show that this cohort of pupils achieve better at other schools in the town. This leads us to believe that there will be a positive impact on this proposal on the educational outcomes of this cohort.

Those with the protected characteristics may incur additional travel costs or uniform costs as a result of having to change school.

e) What actions are to/ or will be taken to avoid any negative impact or to better advance equality?

Free transport would be provided to eligible children

There is no uniform grant from the Local Authority however many schools make special arrangements for pupils entitled to Free School Meals. The availability of an uniform grant at other schools will be investigated at the next review of the EqIA if it is agreed that the consultation process should continue.

f) Provide details of the mitigation.

As in e) above.

The Local Authority and affected schools have a duty to support appropriate transition arrangements and the Council would take all practical steps to ease the transition for pupils, most especially for vulnerable learners, including those who are EverFSM. Were Pells CE Primary School to close the Local Authority is confident that teaching staff at other schools would manage the transition of any pupils to their new school. These circumstances are not unusual in that schools

regularly manage in-year admissions, though it is recognised that there will be a significant number of pupils making the transition at any one time, including a number of pupils from the EverFSM cohort. Therefore additional support will be in place for the transition arrangements as detailed below.

Should the proposal be implemented the Local Authority would work with pupils, their parents and the relevant schools to make appropriate transition arrangements for pupils. Relevant families would be consulted about any specific potential impacts on individuals; for instance, because of loss of support networks, and we would ensure that appropriate individual arrangements are made where this is necessary to avoid potential adverse impacts

All schools have a duty to ensure appropriate provision for pupils who are EverFSM and schools receive specific funding (the pupil premium) to support these pupils. Transfer to a larger school could potentially provide more flexibility of resource to support pupil's needs. Outcomes for EverFSM pupils are good at other schools.

g) How will any mitigation measures be monitored?

The local authority will closely monitor the transition of the pupils to their new schools through regular monitoring arrangements already in place.

All schools have to report on the outcomes of all pupils, including those who are EverFSM. The local authority will continue to monitor the outcomes at all schools for these pupils.

4.10 Human rights - Human rights place all public authorities – under an obligation to treat you with fairness, equality, dignity, respect and autonomy. **Please look at the table below to consider if your proposal, project or service may potentially interfere with a human right.**

Articles	
A2	Right to life (e.g. pain relief, suicide prevention)
A3	Prohibition of torture, inhuman or degrading treatment (service users unable to consent, dignity of living circumstances)
A4	Prohibition of slavery and forced labour (e.g. safeguarding vulnerable adults)
A5	Right to liberty and security (financial abuse)
A6 & 7	Rights to a fair trial; and no punishment without law (e.g. staff tribunals)
A8	Right to respect for private and family life, home and correspondence (e.g. confidentiality, access to family)
A9	Freedom of thought, conscience and religion (e.g. sacred space, culturally appropriate approaches)
A10	Freedom of expression (whistle-blowing policies)
A11	Freedom of assembly and association (e.g. recognition of trade unions)
A12	Right to marry and found a family (e.g. fertility, pregnancy)
Protocols	
P1.A1	Protection of property (service users property/belongings)
P1.A2	Right to education (e.g. access to learning, accessible information)
P1.A3	Right to free elections (Elected Members)

Part 5 – Conclusions and recommendations for decision makers

5.1 Summarise how this proposal/policy/strategy will show due regard for the three aims of the general duty across all the protected characteristics and ESCC additional groups.

- Eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Equality Act 2010;
- Advance equality of opportunity between people from different groups
- Foster good relations between people from different groups

5.2 Impact assessment outcome Based on the analysis of the impact in part four mark below ('X') with a summary of your recommendation.

X	Outcome of impact assessment	Please explain your answer fully.
	A No major change – Your analysis demonstrates that the policy/strategy is robust and the evidence shows no potential for discrimination and that you have taken all appropriate opportunities to advance equality and foster good relations between groups.	<p>The proposed closure of the school is appropriate on the basis of concerns over the long term sustainability of the school, in terms of its capacity to sustain improvements in standards in the context of declining popularity and financial viability. The proposed closure will have a positive impact on the educational outcomes of all children including those pupils with SEN and in the Ever6FSM cohort.</p> <p>All children displaced by the closure of Pells CE Primary School will be accommodated at other schools without the immediate need to provide additional places.</p> <p>Any potential negative impact on children, including those with SEN and those who are Ever6FSM, who are significantly over represented in the cohort, as a result of having to transfer to another school will be mitigated by putting in place effective transition support for pupils.</p> <p>Children who start at a similar level in other schools make better progress. The Local Authority has a responsibility to ensure that we have the same level of ambition for</p>
X	B Adjust the policy/strategy – This involves taking steps to remove barriers or to better advance equality. It can mean introducing measures to mitigate the potential effect.	
	C Continue the policy/strategy - This means adopting your proposals, despite any adverse effect or missed opportunities to advance equality, provided you have satisfied yourself that it does not unlawfully discriminate	
	D Stop and remove the policy/strategy – If there are adverse effects that are not justified and cannot be mitigated, you will want to consider stopping the policy/strategy altogether. If a policy/strategy shows unlawful discrimination it <i>must</i> be removed or changed.	

		children currently at Pells CE Primary School.
--	--	--

5.3 What equality monitoring, evaluation, review systems have been set up to carry out regular checks on the effects of the proposal, project or service?

(Give details)

The local authority has a clear schedule for regular monitoring of schools, and the outcomes achieved by all pupils, including outcomes for those with SEN and EverFSM.

5.6 When will the amended proposal, proposal, project or service be reviewed?

In October 2016 following the publication of statutory notices.

Date completed:	June 2016	Signed by (person completing)	Gary Langford
		Role of person completing	Gary Langford
Date:	June 2016	Signed by (Manager)	Jessica Stubbings

Part 6 – Equality impact assessment action plan

If this will be filled in at a later date when proposals have been decided please tick here and fill in the summary report.

☐

The table below should be completed using the information from the equality impact assessment to produce an action plan for the implementation of the proposals to:

- 1. Lower the negative impact, and/or
- 2. Ensure that the negative impact is legal under anti-discriminatory law, and/or
- 3. Provide an opportunity to promote equality, equal opportunity and improve relations within equality target groups, i.e. increase the positive impact
- 4. If no actions fill in separate summary sheet.

Please ensure that you update your service/business plan within the equality objectives/targets and actions identified below:

Area for improvement	Changes proposed	Lead Manager	Timescale	Resource implications	Where incorporated/flagged? (e.g. business plan/strategic plan/steering group/DMT)

6.1 Accepted Risk

From your analysis please identify any risks not addressed giving reasons and how this has been highlighted within your Directorate:

Area of Risk	Type of Risk? (Legal, Moral, Financial)	Can this be addressed at a later date? (e.g. next financial year/through a business case)	Where flagged? (e.g. business plan/strategic plan/steering group/DMT)	Lead Manager	Date resolved (if applicable)

Appendix E

SCRUTINY REVIEW BOARD COMMENTS TO CABINET

Rodmell Church of England Primary School and Pells Church of England Primary School Review Board – 4 July 2016.

Membership of the Review Board:

Councillors Kathryn Field (Chair), Stephen Shing, Peter Charlton, Kim Forward, Roy Galley, Alan Shuttleworth and Francis Whetstone and representing the Church of England Diocese, Dr Ann Holt.

Review Board Comments for inclusion in report to Cabinet.

No.	Comment	Response
1	Rodmell Church of England Primary School.	The majority of the Review Board members agreed that it would be appropriate to defer the proposed closure of Rodmell Church of England Primary School for a year whilst the Governing Body and School Leadership team rigorously explore the option for partnership working.
2	Pells Church of England Primary School.	<p>Having listened to the evidence put before them, the Review Board were evenly split in their views on the emerging plan for Pells CE Primary School. Four of the eight Members of the Board accepted the Council's position that there is sufficient evidence to support the view that the school should be closed.</p> <p>However, four Members were concerned as to whether there would be a sufficient number of school places available in Lewes should the Pells CE Primary School close. In reaching this view, these Board Members were concerned whether the Council's forecast for future demand for school places might not be accurate, especially taking into account the impact of proposed developments in the area.</p> <p>Some Members of the Board expressed the view that there was merit in exploring the 'Farm School' option. The Board agreed that if the school were to stay open, further significant work would need to be done on changing the perception amongst local people of the school, so that it could attract more preferences from local families.</p>

No.	Comment	Response
3	General comment relating to both proposals.	The Review Board agreed that these proposals needed sensitive handling by the Council and that clear reasoning should be provided to the public explaining the reasons for any decisions taken regarding the futures of both schools. This would be especially important if Cabinet made different decisions about the futures of these two schools.

Report to: Cabinet
Date of meeting: 19 July 2016
By: Director of Communities, Economy and Transport
Title: Update on the Libraries' Transformation Programme
Purpose: To provide Cabinet with an update on the Libraries' Transformation Programme and to recommend that Cabinet approves the proposed amended changes to Library Opening Hours.

RECOMMENDATIONS

The Cabinet is recommended to:

- (1) approve the proposed changes to library opening hours in Appendix 3.; and**
 - (2) note the progress on the other aspects of the Libraries' Transformation Programme.**
-

1 Background Information

1.1. In December 2015 Cabinet approved the proposed Libraries' Transformation Programme (LTP), including an Internal Review of the Library and Information Service (LIS) and the development of the Libraries' Strategic Commissioning Strategy (SCS). Cabinet also agreed to the public consultation on proposed changes to library opening hours, which took place from 11 January to 3 April 2016.

1.2 The December Cabinet report noted how patterns of library usage are changing locally and nationally, with a declining trend in physical visits to libraries and an increase in take up of online library services. The aim of the LTP is to ensure that East Sussex has a modern, affordable library service that meets the needs of people who live and work in the County.

2. Financial Analysis

2.1 The LTP has an agreed savings target of £2m by the end of the current Medium Term Financial Plan period in 2018/19. The net revenue budget of the LIS in 2015/16 was £6m (including depreciation of £567k), consisting of £3.63m of staffing costs (150 full-time equivalents) and £2.37m of non-staffing costs.

2.2 The LTP is on target to deliver the identified savings of £1.25m from the Internal Review of the service (£425k in 16/17, £700k in 17/18 and £125k in 18/19). Savings which total £750k will be delivered from a restructure of staff (£500k) and the reduction in the Libraries stock fund (£250K). The implementation of the amended opening hours proposals will deliver £500k. If the opening hours proposals were not to be approved by Cabinet these savings would have to be found from elsewhere in the County Council. Proposals to achieve the final £750k saving from the Libraries SCS will be quantified as work on the strategy progresses.

3. Supporting Information

Update on the Libraries Transformation Programme

3.1 A review of staffing identified potential efficiency savings that would create a leaner service, focussed on our current agreed priorities. In February 2016 a library service restructure was implemented as part of the Internal Review. The focus of this restructure was a reduction in management posts, with an emphasis on strategic decision making by a smaller senior management team. The restructure also rationalised operational management, librarian roles and Bibliographic Services.

Development of the Needs Assessment and Draft Strategic Commissioning Strategy

3.2 The Libraries SCS will be based on a robust assessment of the needs of residents of the County as a whole and within specific communities, and the development of the draft SCS will be guided by priority outcomes informed by the needs assessment. It will enable the development of a

strategy which will outline what is required in future and how this can be delivered, by focussing on outcomes, not the existing service.

3.3 The LIS is currently undertaking the needs assessment, demand and gap analysis. In addition a wider research programme is underway that includes a review of current library service provision, our property portfolio and accessibility to the service, our traded services, use of volunteers, income and funding opportunities, legislation, and innovation and good practice. It will recognise where we already work in partnership with others to deliver services to local communities through libraries, for example with Parish and District Councils.

3.4 The LIS is working with a council-wide project team to develop a draft Strategy that will enable the County Council to understand the contribution that the library service can make to achieve the County Council's priority outcomes and ensure that it is aligned with the County Council's existing and future plans and strategies for other services. The draft SCS will be presented to Cabinet in the summer of 2017 and, if agreed, publicly consulted on before being finalised for implementation.

Proposed changes to library opening hours

3.5 The rationale behind the consultation proposals to change library opening hours was to cut library running costs by reducing opening hours at quieter times, whilst ensuring that people have access to services across the County when they are most used. It was proposed that libraries would only be open at times between the hours of 10am and 5pm, except for those libraries that are currently open later than 5.30pm, which would retain one evening opening until 6pm on a Thursday. It was acknowledged that the County Council would not be able to make all of the necessary savings by only reducing opening hours before 10am and after 5pm, but that by making some further changes to opening hours we would still retain a comprehensive service across the County.

3.6 The proposals would result in an overall reduction of around 25% of current opening hours. It was recognised that a uniform reduction of 25% for every library would have a disproportionate impact on smaller libraries in particular and for their users. Therefore, the proposals were individual to each library, with a reduction of between 8% and 27% depending on their current opening hours.

Results of the public consultation

3.6 The Opening Hours Consultation ran from 11 January to 3 April 2016. The consultation was promoted widely to registered library users, and to residents more generally. Information was provided in Your County (sent to all residents) and a feature was included in our e-newsletter (sent to around 70,000 people). An online version of the consultation questionnaire was also available on our 'Have Your Say' webpages. Key stakeholders and user groups were written to and discussions held with partners, including a number of Parish Councils and the Youth Cabinet

3.7 2,970 people replied to the consultation. The headline results are summarised below and a Consultation Analysis Report Summary is provided as Appendix 1 to this report. The full version of the Consultation Analysis Report, which includes a copy of the consultation questionnaire, has been placed in the Members' and Cabinet Room, and is available on the Cabinet pages of the County Council's website. It can be inspected upon request at County Hall. Members must read and have regard to the full version of the Consultation Analysis Report.

3.8 Most people who responded to the consultation were regular library users, with 97% of respondents having used the library in the past 12 months and 74% of respondents saying they visited the library on at least a fortnightly basis. The reason most often cited for visiting was 'for leisure and enjoyment', which was stated as the main reason in 42% of responses. The next main reasons given were 'for education and training' and 'finding out about other local/central government services' in 11% of responses each.

3.9 The most popular times of the day when people told us they usually visited the library were between 10am and midday, closely followed by 2pm to 5pm. Overall, the period from 10am to 5pm was cited as the time when people usually visited the library in 80% of responses. Over 70% of people who replied to the consultation said they would still have access to a library if the County Council implemented the proposed new opening hours and fewer than 13% said they would not.

3.10 Additional surveys commissioned about the use of the 15 libraries that currently open during the evening period showed that the number of visitors counted entering the library decreased

significantly during the course of the evening. In total, almost 80% of all those we interviewed in the evening survey (from 4pm onwards) said they would not be adversely affected (to the point they would be unable to use the library) by the planned changes. There was very little evidence that the libraries were being used as study spaces, with 8.5% of evening users describing themselves as students, but only 2% of users saying that access to a study space was the main reason for their visit. 5.6% of users interviewed were aged under 16 and 10% were under 25. This does not suggest that reducing evening opening hours would have a disproportionate impact on young people using the library for homework or as a quiet study space.

3.11 As part of the Opening Hours Consultation people were also invited to give their general comments or suggestions on the proposals. These are also summarised in Appendix 1. The majority of respondents (77%) had no comment to make or were neutral towards the proposals. 4% of comments were positive towards the proposals and 19% were negative. We also asked whether there were alternative proposals, other than reducing opening hours, that could help achieve the necessary savings and invited other general comments or suggestions. A total of 651 comments were received, including suggestions for cost-cutting and income generation. A summary of the feedback received in response to these open questions is contained in Appendices 1 and 2. Unfortunately it is not anticipated that the suggestions put forward would secure the level of savings required even as part of a package of measures.

3.12 Respondents were also invited to express an interest if they would like to know more about volunteering opportunities within the service. There was a very good response rate to this with over 300 people expressing an interest in volunteering and we have made contact with those people with an offer of current volunteer roles within the service. The potential for further avenues of volunteer support, on top of those already used effectively by the service, will be considered as work on the Libraries SCS proceeds.

3.13 Some partners, stakeholders and respondents asked the County Council to consider different opening hours at specific libraries. These comments were carefully examined and have resulted in changes to the proposed opening hours for 11 of the County's 24 libraries. The final opening hours proposals for all libraries, including the reasons for revisions to the original proposals, are included in Appendix 3.

3.14 Under section 7 of the Public Libraries and Museums Act 1964 it is: 'the duty of every library authority to provide a comprehensive and efficient library service for all persons desiring to make use thereof'. A draft Rationale and Impact Assessment was undertaken for the consultation proposals. This provided an assessment of needs to enable the County Council to form a view as to whether the library service will be 'comprehensive' and 'efficient' if the proposed changes are implemented. This Assessment has been updated with the data gathered from the consultation and two sets of further surveys. A final Rationale and Impact Assessment of the final opening hours proposals is attached as Appendix 4.

3.15 An Equalities Impact Assessment (EqIA) of the proposals has also been undertaken which has informed the final Rationale and Impact Assessment. In considering the amended opening hours proposals, Cabinet Members are required to have 'due regard' to the duties set out in Section 149 of the Equality Act 2010 (the Public Sector Equality Duty). The EqIA is carried out to identify any adverse impacts that may arise as a result of the proposals for those with protected characteristics and to identify appropriate mitigations. A summary of the EqIA is attached as Appendix 5 to this report. The full version of the EqIA has been placed in the Members' and Cabinet Room and is available on the Cabinet pages of the County Council's website. It can be inspected upon request at County Hall. Members must read the full version of the EqIA and take its findings into consideration when determining these proposals.

3.16 The final Rationale and Impact Assessment confirms that there will be some impacts as a result of the implementation of these proposals. Impacts occur where groups of people have less flexibility than others over when they are able to visit libraries. The EqIA identified three main groups to whom this applies: people who work full-time, children and young people who are in full-time education, and people with a disability (especially where they rely on support from another individual or particular services to access the library). However, we know from the results of the consultation and the evening surveys that the level of impact for these groups is small.

3.17 The final proposals include mitigation for the impact of reductions in library opening hours by prioritising one late evening each week until 6pm for those libraries that already have evening provision, through lunch-time opening, and by all libraries opening on Saturdays. The exception to this is Ringmer library, where in response to public consultation we are proposing not to have a late night opening but instead to open the library on Saturdays. It is also important to remember that the LIS is a service that extends far beyond library buildings. The existing e-library offers library users the opportunity to access materials such as e-books, e-magazines and audio books online 24 hours a day without the need to visit the library and also to renew loans on items borrowed or place a reservation. Items can also be renewed 24 hours a day by phone using the library helpline. The Home Library Service delivers books and other materials to people who cannot easily use a library due to disability or frailty. If the proposed changes are implemented, we will promote the new opening hours widely in libraries and across the County to make sure people are aware of, and are able to easily remember the changes. As part of the promotion we will actively promote the expanding offer and role of the e-library and other means of accessing the library service at alternative times.

3.18 The final assessment concludes that the needs of the public that are met by using the library would still be fulfilled if the County Council implemented the proposed library opening hours in Appendix 3, and that the County Council would continue to fulfil its duty to provide a comprehensive and efficient library service.

3.19 If approved, a reduction in library opening hours of 25% on average across the County would result in a similar percentage reduction in the numbers of full-time equivalent (FTE) staff who work in and manage the County's libraries. It is estimated that the staffing complement would be reduced by around 30 FTEs. In order to minimise the potential for redundancies, staff vacancies arising since the autumn of 2015 have mainly been filled by existing staff working additional hours on a fixed-term basis or by recruiting temporary staff, both of which arrangements will end in the autumn of 2016. In addition, a number of voluntary severance requests have been received, which will be considered against the future needs of the service. Overall it is expected that the measures outlined in this paragraph would mean that the number of FTE posts that would be at risk of compulsory redundancy would be significantly less.

Governance

3.20 It was agreed at Cabinet in December that a Scrutiny Review Board will be established to provide advice and critical challenge throughout the development of the SCS and ensure proposals reflect the needs of the community. The Audit, Best Value and Community Services Scrutiny Committee will have the opportunity to review this report once the July Cabinet agenda and reports are published and prior to the Cabinet meeting itself. It is proposed that the Libraries SCS Scrutiny Review Board has its first meeting in the autumn to consider and have the opportunity to comment on the findings from early work to identify need and the strategic priorities.

4. Conclusion and Reasons for Recommendations

4.1 Based on the results of the libraries Opening Hours Consultation and the final Rationale and Impact Assessment, the proposals for library opening hours have been revised. However, if implemented, they would still deliver the full year savings of £500k as originally identified and contribute towards the overall LTP savings target of £2m. The consultation has enabled the County Council to ensure that the impacts of the proposals are fully understood and they have been revised to have the minimum impact on current service users. The final Rationale and Impact Assessment concludes that the needs of the public that are met by using the library would still be fulfilled if the proposed library opening hours were implemented and that the County Council would continue to fulfil its duty to provide a comprehensive and efficient library service. It is therefore recommended that Cabinet agree to the proposed amended changes to library opening hours, to take effect by the end of 2016.

4.3 The LTP is on target to deliver the proposed savings from the Internal Review of the service of £1.25m. The implementation of the SCS will optimise how the LIS is delivered, responding to current and future need, to achieve the best possible service within available resources. The outcome of the Strategy is dependent on the findings of the needs assessment. Proposals to achieve the final £750k saving from the Libraries SCS will be quantified as work on the strategy progresses, with a draft strategy ready by the summer of 2017.

RUPERT CLUBB
Director of Communities, Economy and Transport

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LOCAL MEMBERS

All.

BACKGROUND DOCUMENTS

Libraries' Transformation Programme, Cabinet Report and Appendices, 15 December 2015
Consultation Analysis Report Full Appendix 1
EqIA Full Appendix 5

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Cabinet **19 July 2016**

Appendix 1 Consultation Analysis Report Summary

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1 Introduction

1.1 Background

- 1.1.1 East Sussex County Council (ESCC) Library and Information Service (LIS) is responsible for 24 libraries plus the mobile library, the library at Lewes prison, an online e-library service, the Schools Library and Museums Service (SLAMS), a volunteer-run home library service and the online database - East Sussex Community Information Service (www.ESCIS.org.uk). The libraries offer a range of services including borrowing services, computer and Wi-Fi access, and a variety of advice and training opportunities.
- 1.1.2 Customer demand for library services in East Sussex is changing. Over the past five years there has been an 87% rise in use of the e-library and a 568% increase in the download of e-books, compared to an 11% decrease in physical visits and a 20% reduction in stock issues. These figures reflect a national trend towards increased use of digital services. Despite these changes, there were still 1.79 million visits to East Sussex libraries in 2015/16, and the LIS currently has 224,300 members. The LIS has an extensive network of free computers and internet access (The People's Network). The People's Network is available in every library and last year there were over 320,000 individual sessions. Computer Buddy volunteers support library customers to access and use the internet and other computer functions, both on a pre-booked and drop-in basis.
- 1.1.3 Due to significantly reduced funding for local government, the County Council needs to save up to £90million by 2018/19. It is considering a number of changes that could save £2million in the running costs of library services and contribute towards the County Council's overall savings plan. This includes proposals to reduce opening hours, as well as future changes to create a more modern and sustainable library service.
- 1.1.4 The proposals to reduce opening hours were the subject of a public consultation programme over a twelve week period from 11 January to 3 April 2016. The consultation also sought feedback on how residents use or would like to use the Library and Information Service.
- 1.1.5 This report presents the results of the consultation including views on the proposals as well as suggestions for alternative proposals that could achieve the savings that need to be made from the Library and Information Service. This analysis will be used in the development of final proposals for the County Council's Cabinet in summer 2016. It is intended that any changes to opening hours would be implemented by the end of 2016.

1.2 Methodology

- 1.2.1 Detailed questionnaires were prepared by ESCC containing a range of questions relating to existing use of libraries and library services across East Sussex. The consultation provides the opportunity to understand how and when people use library facilities as well as gauging feedback on how potential changes could impact on people's existing activities.
- 1.2.2 The questionnaires were provided in two formats with an online survey and paper booklets provided in libraries for completion.
- 1.2.3 Overall 1,018 people filled out the online questionnaire, while 1,952 people filled out paper versions resulting in a total of 2,970 respondents.

1.3 Report Structure

- 1.3.1 This report is structured as follows:
- Chapter 2 provides a summary of the key findings from the consultation
 - Chapter 3 gives baseline data about the survey and the demographics of respondents
 - Chapter 4 sets out detailed analysis of how the East Sussex Library and Information Service is currently used
 - Chapter 5 contains detailed analysis of the responses received regarding the proposed changes to library opening hours
 - Chapter 6 summarises other comments and responses received in relation to the proposed changes to opening hours.

2 Key Findings

2.1 Library Use

2.1.1 Respondents were asked for the reasons why they currently make use of the Library and Information Service.

- By far the most popular reason for using the Library and Information Service was for leisure and enjoyment; this was selected almost four times as often as the next highest response and accounted for 42% of all replies.
- Education & training and to find out about government services were the next most frequent reasons, each accounting for 11% of responses.
- Supporting a child and young person's learning and enjoyment was almost as frequent with 9% of total responses.

2.2 Library Services

2.2.1 Respondents were then asked which services offered by the Library and Information Service they thought were of greatest importance. The purpose of this question was to provide some context for the Strategic Commissioning Strategy which the Council is developing, to help the Council understand what current library users thought were the greatest areas of need for the service. The five most important services rated by respondents were:

- Materials (i.e. books, CDs, DVDs, e-books) for adults to borrow for leisure and enjoyment – **18%**
- Materials for children and young people to borrow for leisure, enjoyment and literacy – **13%**
- Access to computers and Wi-Fi for finding out about and applying for services like social care, children's services and state benefits – **12%**
- Reference materials (paper and electronic versions) including newspapers, encyclopaedias and other resources that people use to look up information – **12%**
- Events for children and young people that encourage and help them to read – **11%**

2.3 Access to Libraries with Proposed Opening Hours

2.3.1 A key question in the survey asked respondents to state whether they would be able to continue to visit the library if the proposed opening hours were implemented.

- Just over 70% of survey respondents stated that they would continue to be able to visit the library and just fewer than 13% stated that they would not.
- Almost 18% of survey respondents did not answer this question. If they are taken out of the analysis, then of those respondents who answered this question, 85% would still be able to use the library during the proposed opening hours and 15% would not.

3 Profile of Survey Respondents

3.1 Responses Received by Library

- 3.1.1 The libraries with the greatest number of responses were, in descending order, Bexhill (12% of total responses), Eastbourne (11%), Seaford (9%), Lewes (8%) and Newhaven (7%).
- 3.1.2 The libraries with the fewest responses were Pevensey Bay (21 responses), Mayfield (32), Wadhurst (41), Forest Row (44) and Hampden Park (45). Each of these accounted for around 1% of total responses. There were 107 responses where the respondent did not specify a library.

3.2 Age Profile of Respondents

- 3.2.1 There was a distinct trend of those who completed the survey increasing with age up to the age of 75, with those over 65 accounting for 50% of all respondents.

3.3 Employment Status Profile of Respondents

- 3.3.1 Retired people form the largest proportion of respondents, accounting for 54% of all respondents. Relatively small numbers of students and unemployed people make use of the service, based on this survey, although it should be noted that young people are under-represented amongst survey respondents.

4 Use of the Library and Information Service

4.1 Use of the Library and Information Service in the Last 12 Months

- 4.1.1 97% of respondents to the question had used the library personally in the last 12 months, while a further 1% had someone else access the service on their behalf. 2% stated that they had not used the Service in the past year; given the fact that distribution of paper copies of the survey was principally through library premises, it is unsurprising that the overwhelming majority of respondents were library users.

4.2 Reasons for Use of the Library and Information Service

- 4.2.1 In considering changes to opening hours, it is important to understand how and why libraries are used at present. Therefore, as part of the survey, respondents were asked for the reasons why they currently make use of the Library and Information Service.
- 4.2.2 The results are shown in figure 4.2 (App 1 page 16).
- 4.2.3 By far the most common reason for using the Library and Information Service was for leisure and enjoyment, accounting for 42% of all replies. Education & training and to find out about government services were the next highest reasons, each with 11% of responses. Supporting child and young person learning was almost as high with 9% of total responses. There was also a high number in the 'other' replies category, at 10%, many of which were explained as 'to borrow books', giving a functional rather than need based response.
- 4.2.4 Results were consistent across individual libraries.

4.3 Reasons for Not Currently Accessing the Library and Information Service

- 4.3.1 The small number of respondents who stated that they had not accessed the Library and Information Service were asked the reasons for this.
- 4.3.2 The main reasons given were lack of awareness of online services (23 responses), inconvenient opening hours (22) and lack of need (21).

4.4 Importance of Services Provided by the Library and Information Service

- 4.4.1 Respondents were asked which services offered by the Library and Information Service they thought were of greatest importance and the results are shown in Figure 4.4 (App 1 page 17). The purpose of this question was to give context for the Strategic Commissioning Strategy and to help the Council understand what current library users thought were the greatest areas of need for the service.
- 4.4.2 The five most important services rated by respondents were materials (i.e. books, CDs, DVDs, e-books) for adults to borrow for leisure and enjoyment (18%) and materials for children and young people to borrow for leisure, enjoyment and literacy (13%). Together, these services accounted for almost one third of responses. Access to computers and Wi-Fi for finding out about and applying for services like social care, children's services and state benefits was third most important (12%), together with reference materials (paper and electronic versions) including newspapers, encyclopaedias and other resources that people use to look up information (also 12%). Events for children and young people that encourage and help them to read were fifth most important (11%).
- 4.4.3 Again, the results are generally consistent across libraries.

5 Response to Opening Hours Proposals

5.1 Frequency of Library Use

- 5.1.1 Figure 5.1 (App 1 page 18) shows the frequency of visits to the library by respondents. Most respondents, around 73%, visit the library between once or twice a week and once a fortnight. Only 1% of respondents use the library on a daily basis. Results are broadly consistent across libraries although a number of the smaller libraries have a lower proportion of frequent visitors.

5.2 Time Profile of Library Visiting

- 5.2.1 Figure 5.2 (App 1 page 19) shows the times of day respondents visit the library.
- 5.2.2 Most noticeable from Figure 5.2 is the low proportion of visits before 1000 and after 1700, accounting for 20% of total visits. By contrast, the daytime periods of 1000 – 1200 and 1400 – 1700 are by far the most popular with 33% and 27% of total visits respectively. Once again, there is a high degree of consistency between individual libraries.

5.3 Access to Libraries with Proposed Opening Hours

- 5.3.1 Respondents were then asked whether they would be able to continue to access the library if the proposed opening hours were introduced. Figure 5.3 (App 1 page 20) shows all responses to this question.
- 5.3.2 Figure 5.3 shows that just over 70% of survey respondents stated that they would continue to be able to visit the library and just fewer than 13% stated that they would not. Almost 18% of survey respondents did not answer this question. If they are taken out of the analysis, Figure 5.4 (App1 page 21) shows the results for those who answered 'yes' or 'no' to this question.
- 5.3.3 Figure 5.4 shows that, of those who provided a response, 85% would still be able to use the library during the proposed opening hours and 15% would not.
- 5.3.4 Responses by individual library are shown in Figure 5.5 (App 1 page 22).
- 5.3.5 For most libraries, between 80 and 90% of respondents state that they would continue to be able to access the library, which is consistent with the overall total of 85% discussed earlier. Only one library, Ringmer, has fewer than 70% of respondents stating that they would be able to access the library (69%), while the next lowest is Wadhurst at 72%. Pevensey Bay (75%) and Hollington (76%) are also at the lower end of the scale but the absolute numbers affected are small; even for these, however, three quarters of respondents state that they would still be able to access the library.

5.4 Respondents Unable to Visit Libraries with Proposed Opening Hours

- 5.4.1 This section contains more detailed analysis of those who stated that they would be unable to visit the library with the proposed opening hours. These respondents are considered with regard to:
- Time of day of visit
 - Age
 - Employment status
 - Access to an alternative library
- 5.4.2 Each of these is considered in turn below.

Analysis by Time of Day

- 5.4.3 Figure 5.6 (App 1 page 23) sets out the analysis of respondents unable to access the library by time of day of current visit. It should be noted that many respondents currently visit the library in more than one time period; so, while the graph shows the number of individuals affected in each time period, these cannot be summed as this would overstate the total.

- 5.4.4 Figure 5.6 shows a relatively consistent number of respondents affected in the mid-morning, afternoon and evening time periods, and relatively fewer affected before 10am and at lunchtime. In percentage terms, more of the evening respondents are affected (37%) followed by those visiting before 10am (21%); this reflects the focus of the proposed changes being at these times of day.

Analysis by Age

- 5.4.5 The next analysis shows a breakdown by age for those who stated that they would be unable to visit the library if the proposed opening hours were implemented, as shown in Figure 5.7 (App 1 page 24). These datasets only include those respondents who provided their age group as part of their survey response. It should be noted that some respondents declined to answer these questions or opted for 'prefer not to say'.
- 5.4.6 The total response to this question was 317, out of the 380 respondents who stated that they would not be able to use the library with the proposed opening hours (see section 2.4); eight respondents opted for 'prefer not to say' and 55 did not answer the age group question.
- 5.4.7 Figure 5.7 shows that greatest absolute impact is on respondents in the 35 – 64 age group, with relatively low numbers of respondents affected in the under 35 and over 75 groups. In percentage terms, however, the greatest impact is on 16 – 34 year olds, with around 30% affected; respondents over 65 were least affected (around 6%).

Analysis by Employment Status

- 5.4.8 Respondents were also asked about their employment status and Figure 5.8 (App 1 page 25) shows the results for those respondents who stated they would be adversely affected by the proposed changes. Again, these datasets only include those respondents who provided their employment status as part of their survey response. Some respondents declined to answer these questions or opted for 'prefer not to say'.
- 5.4.9 The total response to this question was also 317 with 63 respondents not answering the employment status question.
- 5.4.10 The greatest impact, in absolute and relative terms, is on respondents who are in full time employment. This group accounts for 32% of all those affected, followed by retired persons (22%) and part time workers (21%). Only a small number of students and unemployed people stated that they would be affected, although it should be borne in mind that young people were under-represented in survey responses.
- 5.4.11 Turning to relative impact, again this is highest for full time workers with 27% of this group stating that they would be affected. In contrast, only 5% of retired persons stated that they would be affected.

Alternative Library

- 5.4.12 Finally, respondents who stated that they would not be able to access the library they were commenting on with the proposed opening hours were asked if they would be able to visit an alternative one. Figure 5.9 (App 1 page 26) summarises these responses by current library.
- 5.4.13 There is considerable variation between libraries in the response to this question. At several libraries between 40% and 50% of respondents who provided an answer stated that they would be able to visit an alternative, including Forest Row, Hampden Park, Langney, Pevensey Bay, Polegate and Willingdon. In contrast, no respondents at Bexhill, Heathfield and Mayfield stated that they would be able to use an alternative location. Overall, 14% of respondents stated that they would have access to an alternative, but it is noteworthy that this proportion was lower for the Council's larger hub libraries, at typically no more than 10% (e.g. Eastbourne, Hastings, Lewes and Seaford).

6 Other Comments

6.1 Introduction

- 6.1.1 This section summarises other comments received during the consultation process. These include survey respondents' comments about the proposals and suggestions for alternatives to changing opening hours, as well as correspondence from individuals, groups and organisations that were received directly by the Council, outside of the consultation survey.

6.2 Attitudes to Library Change

- 6.2.1 Views on the potential changes to library opening times were collected as part of the survey using an open question where respondents could provide comments on the proposals. Table 6.1 summarises the nature of comments received and section A3 of Appendix A breaks down the results by individual library.

Table 6.1: Summary of Comments Received on Opening Hours Proposals

Nature of Comment	%
Positive	4%
Neutral	7%
Negative	19%
No Comment	70%
Total	100%

- 6.2.2 As the table shows, the overwhelming majority of respondents had no comment to make or were neutral towards the proposals in their remarks, accounting for 77% of responses.
- 6.2.3 19% were negative, comprising approximately equal numbers of those who were opposed to any reduction in hours or to the scale of changes and those who had specific concerns about the detail of the proposals. Of the latter, the most frequent comments related to:
- The risk of confusion amongst users about having different opening hours on different days of the week; many commented that hours should be standard across the week or that if this was not possible, then the new hours should be widely publicised.
 - The difficulty that schoolchildren and people in full-time employment could face in accessing libraries in future.
- 6.2.4 4% of responses were positive towards the proposals. Typically, these were respondents who would not be affected by the changes and who thought that the proposals were 'reasonable' given the financial circumstances faced by the Council.
- 6.2.5 Some respondents requested that neighbouring libraries had opening hours that complemented one another, to maximise the available choice.
- 6.2.6 Where respondents had specific comments about the proposed changes for individual libraries, these have been recorded and set out in Table 6.2.

Table 6.2: Summary of Key Issues Raised by Library

Library	Opening Times Desired				Full Day opening / closing	Consistent hours across the week	Other Requests for Opening Times	Total Opening Hours Comments
	Before 1000	Until at least 1700	Evenings at least once/week	Sundays				
Battle	3	7	1	2	2	3		18
Bexhill	14	7	24	0	6	22		73
Crowborough	4	4	6	1	1	12		28
Eastbourne	11	14	29	3	21	7		85
Forest Row	0	1	0	0	0	1		2
Hailsham	0	2	1	0	0	1		4
Hampden Park	0	1	0	0	1	1		3
Hastings	5	2	17	3	2	0		29
Heathfield	2	0	2	0	0	2	Monday (7)	13
Hollington	0	1	2	0	0	0	Saturday all day (2)	5
Langney	0	1	0	0	1	0	Saturday all day (2)	4
Lewes	2	1	21	1	0	2	Wednesday all day (5)	32
Mayfield	0	0	0	0	0	0		0
Newhaven	0	4	0	0	0	0		4
Ore	0	0	0	0	0	0		0
Peacehaven	0	10	7	0	0	2	Tuesday AM (1)	20
Pevensey	0	1	2	0	0	0		3
Polegate	0	2	1	1	0	0		4
Ringmer	0	0	1	0	0	2	Wednesday AM (12)	15
Rye	1	2	1	0	0	2	Close on Tues PM instead of Mon (1)	7
Seaford	2	1	16	3	15	12	Wednesday all day (4)	53
Uckfield	0	1	4	1	2	1		9
Wadhurst	0	0	0	0	0	1		1
Willingdon	0	0	2	0	0	0		2
Totals	44	62	137	15	51	71		414

- 6.2.7 As would be expected, responses reflect the specific proposals for each library but there are some overall themes that emerge. The most common request is for evening opening, on at least one day per week. There is also concern that the proposed hours would be confusing because of the day to day variations that then appear and a number of requests were made for hours to be standardised across the week on the days when the library is open.

6.3 Suggestions Received from Survey Respondents

- 6.3.1 The 2970 respondents generated 651 suggestions; 256 of these suggestions can be categorised as cost cutting and 395 as income generating. A summary of suggestions relating to cost cutting are given in Table 6.3 and to income generation in Table 6.4.

Table 6.3: Cost Cutting Ideas (256)

	Close full days - simplify opening times	More volunteers	Property sharing/disposal	Heat and light	Concentrate on books – keep fewer CDs, mags etc	Fewer staff
Online	34	41	17	14	11	8
Paper	50	25	28	10	10	8
Total	84	66	45	24	21	16

- 6.3.2 The most frequently mentioned idea was to close for full days (84) rather than half days. For many people using libraries, this is part of a general wish to have opening times (and closing times) that are easy to remember – although some suggested that this would also save heat and light.

- 6.3.3 The second most suggested option was to use more volunteers (66).

- 6.3.4 There were also many comments (45) about the physical library assets including some suggestions that small libraries should be closed, and sold, to help fund larger libraries; that library buildings could be shared with organisations – such as tourist information and post office; and about the need to ensure that neighbouring libraries had opening/closing times which fitted with others, particularly in towns such as Eastbourne where there were a number of libraries relatively close together.

Table 6.4: Income Generation Ideas (395)

	Better marketing, promotion, events	£ renting space	£ coffee shops	£ annual sub, loan fees, book clubs, computer charges	£ collection boxes, sponsorship	£ retail (cards, ticket & book sales)	Increase Council Tax
Online	65	58	44	22	11	10	5
Paper	45	34	48	29	11	7	6
Total	110	92	92	51	22	17	11

- 6.3.5 The most common suggestion (110) was to improve marketing/promotion and for libraries to host more events especially for children. This suggestion was frequently combined with another (92) to make better use of library facilities especially for community groups, evening classes and to generate income from room hire.
- 6.3.6 Another repeated suggestion was for libraries to have commercial coffee and refreshment facilities (92).
- 6.3.7 There were various suggestions (51 in all) to introduce or increase charges for services, including having voluntary/compulsory annual membership fees, nominal fees for book loans and charges for using computers.
- 6.3.8 A number of respondents made contributions across both cost saving and income generation themes including the following in connection with:
- Battle library – suggestions included more effort to explain the purpose of the Library and Information Service to attract non-users, and to consider using other organisations to run parts of the portfolio, such as the community information service
 - Bexhill library – suggestions included holding more events aimed at specific age groups, and to target secondary school children better. To run or host workshops on subjects ranging from claiming benefits to writing CVs, to sell cards, artwork and old stock, and to be more active in pursuing charges. There was also a suggestion, from a respondent using Bexhill, that library opening hours should more accurately reflect the size of the catchment population, and that opening hours across geographically adjacent libraries should be co-ordinated.
 - Eastbourne library – suggestions included themed evening study groups, and that the library could host film clubs (pay per view) and children's parties. More outreach was suggested for older children, and more effort to be put into third age opportunities. Also a request to stay open in the evenings, but to close off part of the library and reduce staffing at these times.
 - Forest Row library – a suggestion to introduce nominal charges for library services, and to try to attract commercial sponsorship to support library opening
 - Hastings library – was recognised as providing a quiet space for families who do not otherwise have one. It was suggested that the library should be open on Sundays – especially for children – and one respondent suggested that the service should make more use of social media.
 - Lewes library – suggestions included opening for longer in the winter, increasing loan and reservation fees and having a voluntary annual subscription.
 - Rye library - as with Forest Row, the idea of company sponsorship was raised. Another suggestion was to combine with the post office
 - Seaford – a suggestion that libraries should be open for homework groups, and on Sundays, that the number of books lent to each person could be limited to save stock costs.

6.3.9 Some of the most interesting individual responses are set out in Table 6.5.

Table 6.5: Selection of Individual Suggestions Received

Library Used by Respondent	Comment
Battle & Hailsham	Better marketing - explain library purpose, especially to non-users. Handover information service to community organisation. Coffee shop and more ticket sales.
Bexhill	Better liaison with secondary schools, more quality art events. Regular face to face meetings with library users. Simplify opening hours, be more active in charging.
Bexhill	More events for all ages, hold workshops on benefits and CV writing, sell cards and artwork and old stock.
Bexhill	Don't cut all by 25% but relate cuts to catchment population (Rye 37 hours for pop. 6,000, Bexhill 33.5 for pop.43,000). Consider opening hours across groups (e.g. Hastings + Hollington + Ore)
Eastbourne	Keep open in evenings, but cut number of evening workers – close off parts of the library
Eastbourne	Bring other organisations in, (e.g. tourist information) charge, and be flexible/imaginative
Eastbourne	More outreach to older children. Foreign language learning, third age opportunities (cryptic crosswords, knitting circles), table tennis, get Central Government grants for citizenship training. Make extensive use of volunteers
Eastbourne	Safe spaces for book reading clubs and women's groups, themed study groups, health therapy groups, film clubs – pay per view – and children's parties
Eastbourne & Langney	Space needed for social interaction (elderly, young mothers) make small charges for loans and book clubs, use more volunteers
Forest Row	Nominal charges, business sponsorship
Hastings	Importance of quiet space for families who don't otherwise have one. Open on Sundays – especially for children.
Hastings & Ore	Get more involved in social media – Twitter and Facebook. Book launchings & signings, links to Open University, promotion of local music through gigs, get publishers to donate books with slight flaws.
Lewes	Arrange school visits – open longer in the winter. Open a café.
Lewes	Increase loan and reservation fees, have a voluntary annual subscription
Not specified	More marketing to non-users. School visits to improve age profile. Open coffee shop to make library a destination of choice.
Polegate	More for children – transfer activities from children's centres. Book parties, local craft groups, coffee. Can volunteers cover lunch breaks for paid staff?
Rye	Combine with post office. Encourage reading clubs. Consider company sponsorship, as well as voluntary donations, and encourage readers to review books for the benefit of other readers.
Seaford	Reopen café and simplify opening hours
Seaford & Eastbourne	Children's story time, charge for homework groups, coffee shop, open Sundays, close small libraries and replace with mobile, limit number of books lent to each person

6.4 Comments Received From Other Parties

- 6.4.1 A total of 27 separate e-mails and letter were received concerning the proposals, including one petition. These are summarised in the table below and were considered along with the results of questionnaires, as presented in Appendix 1 Consultation Analysis Report Summary and the full consultation analysis report which is also publicly available.

Table 6.6: Summary of other comments received

18 comments from members of the public	
Ten were either neutral or supportive of the proposals and eight were opposed to them. Some suggestions were made for alternative opening times at specific libraries and some alternatives for how savings could be made, for example by using volunteers. Other ways were suggested to try and mitigate for the impact of reduced hours.	
4 comments from Parish or District Councils	
Forest Row Parish Council	Understanding of the need for savings but opposed to the proposals. Expressed concerns about the evidence that had been used to support the extent of reductions and impact on children and young people.
Heathfield and Waldron Parish Council	Reluctant agreement to reduction in opening hours. Opening hours to coincide with public transport and provide alternative hours locally when Heathfield Library is closed.
Wealden District Council	Understanding of the need for savings. Also recognised the role of libraries in supporting the local community. Offer to work with the library service in future.
Willingdon and Jevington Parish Council	Understanding of the need for savings. Expressed concerns about the removal of Thursday morning provision specifically.
2 comments from individual Parish or District Councillors	
Councillor Tickner, Westmeston Parish Council	Concern over rural provision
Councillor Clark, Bexhill East, East Sussex County Council	Supportive of the proposals but suggesting alternative opening hours
2 comments from MPs	
Caroline Ansell MP	Concern about a 25% reduction, request for a comprehensive review to ensure the minimum impact on the majority of service users
Maria Caulfield MP	Passing on concerns from Ringmer Village Hall Management Committee about the limited number of days of provision and lack of Wednesday morning and Saturday
1 petition from Forest Row	
Presented by Alex McKinney with approximately 200 signatures	Objecting to a reduction in opening hours. Expressing the importance of the library to the local community and value for home schooled children.

- 6.4.2 In addition, Year 5 pupils of Seaford Primary School sent in letters, outside of the consultation period, expressing their support for Seaford Library and concern about the proposals. A senior member of staff from the Library and Information Service went and met with the pupils and their teachers to explain the rationale behind the proposals and answer any questions.
- 6.4.3 These comments will be reviewed and considered by the Council as part of the overall exercise and will help inform decision-making.

7 Appendix 1: Graphs

7.1 Graphs

7.1.1 This appendix provides the Figures referred to in the Consultation Analysis Report Summary.

Figure 4.2: Reasons Given for Using the Library and Information Service

This Figure shows the purposes respondents stated that they had for using the Library and Information Service, totalled for all responses. Total responses does not equal total survey respondents because respondents were invited to select as many options as they wished. The total number of responses to this question was 5,918.

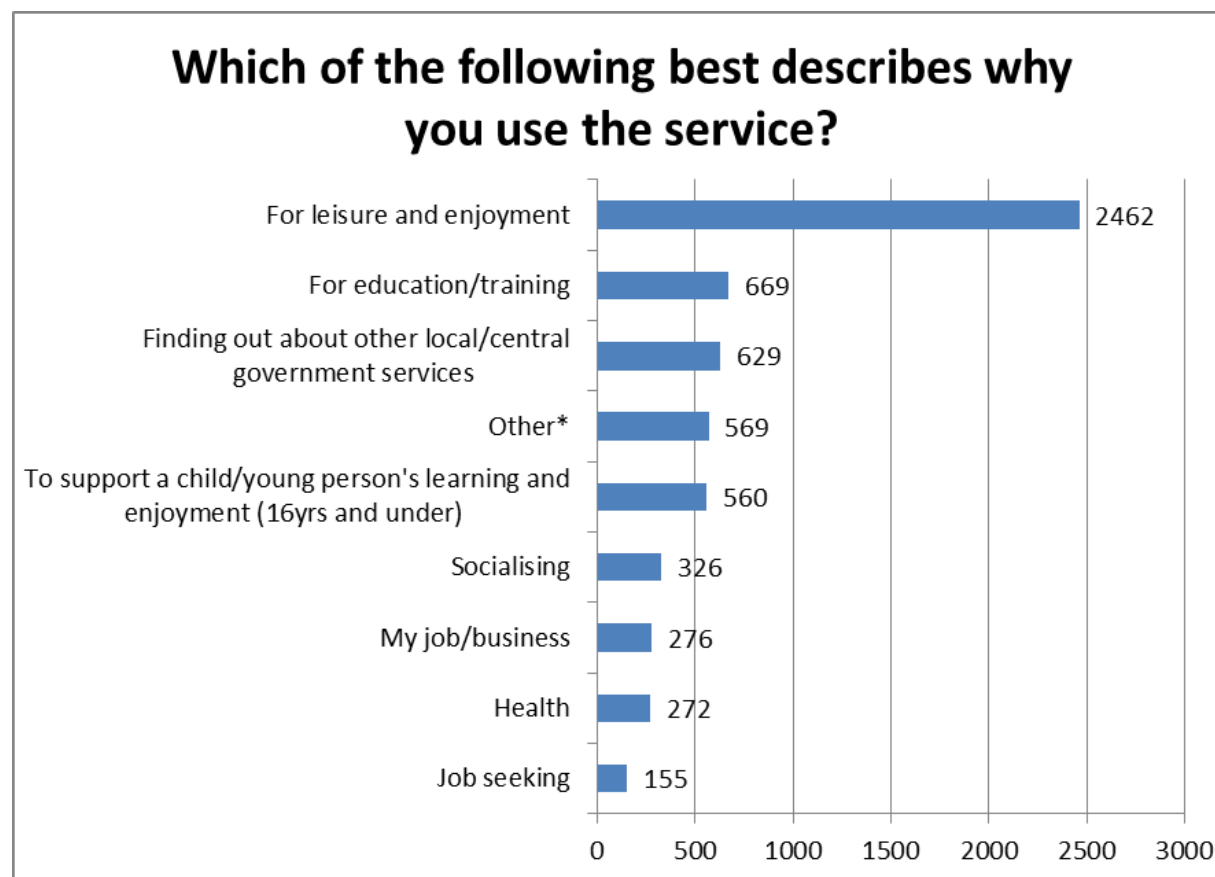


Figure 4.4: Services Rated as Most Important

This Figure shows which services provided by the Library and Information Service that respondents ranked as 'most important'. Total responses does not equal total survey respondents because respondents were invited to select five options; some selected fewer than this and others selected more. The total number of responses to this question was 15,352.

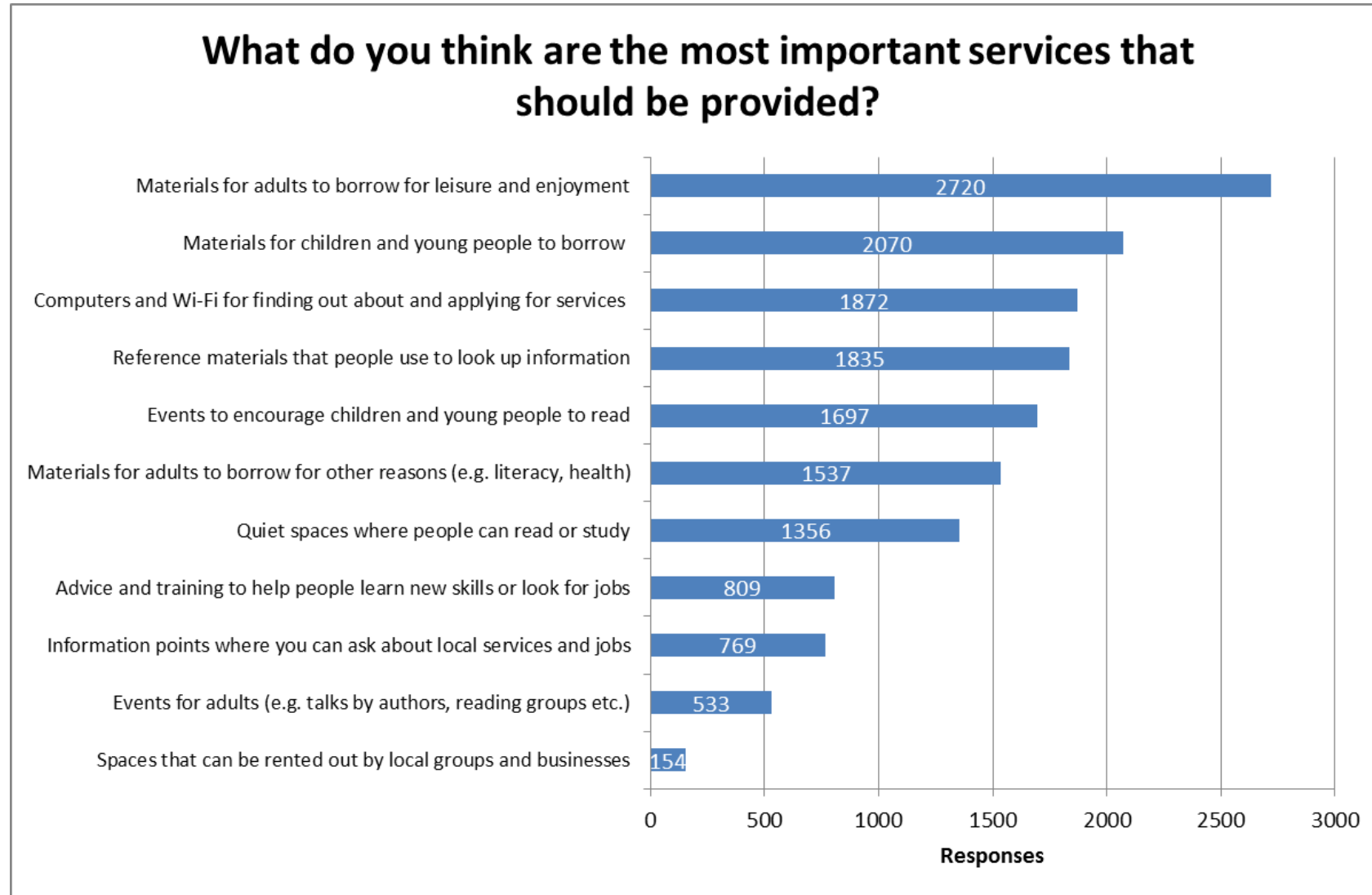


Figure 5.1: Frequency of Library Visiting

This Figure shows how often respondents stated that they visit the library, totalled for all responses. Total responses does not equal total survey respondents because some respondents selected more than one library and others did not answer this question. The total number of responses to this question was 2,701.

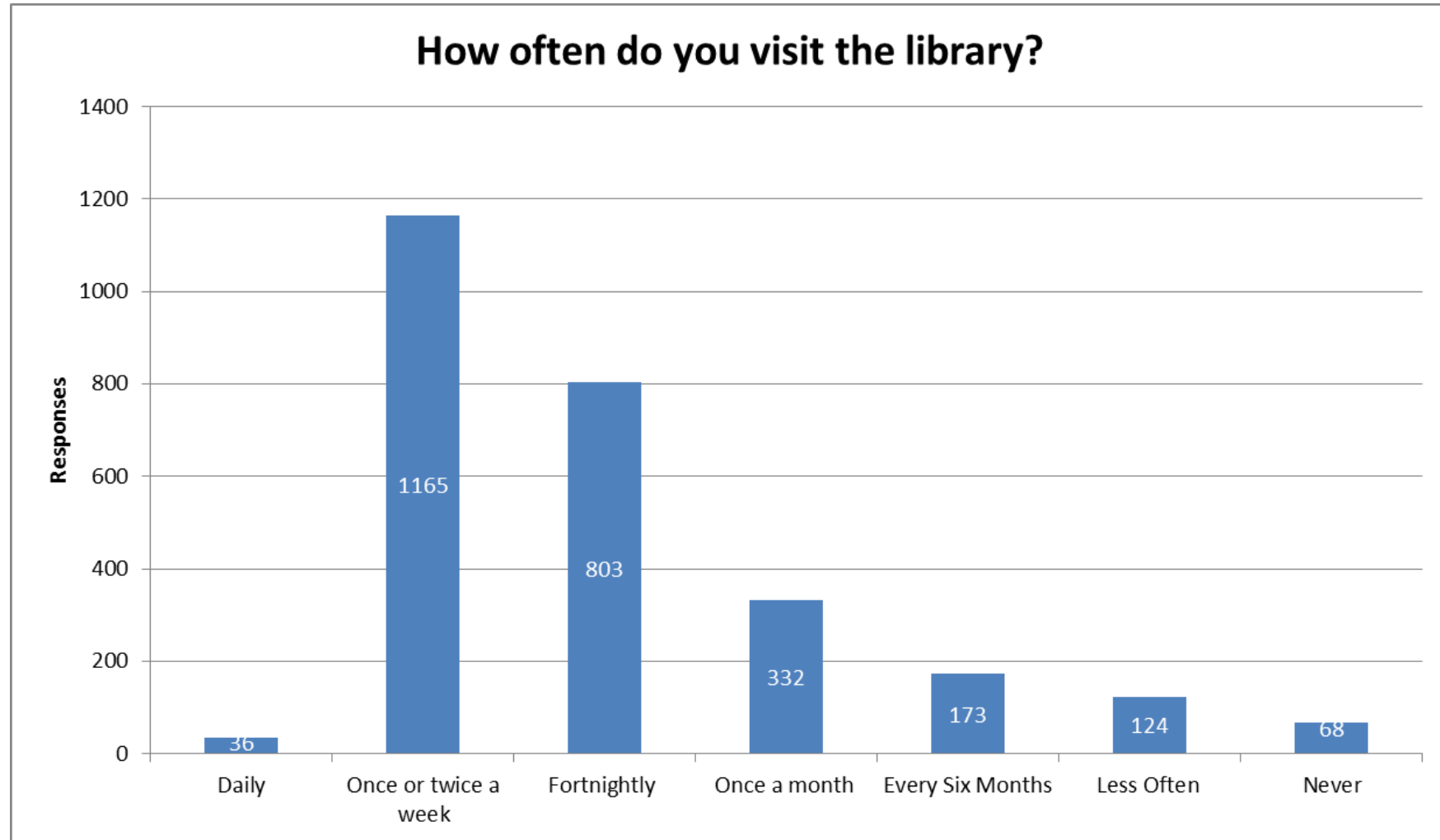


Figure 5.2: Times of Library Visiting

This Figure shows the time profile of visits made to all libraries. Total responses to this question do not equal total survey respondents because some respondents selected more than one time period. The total number of responses to this question was 6,038.

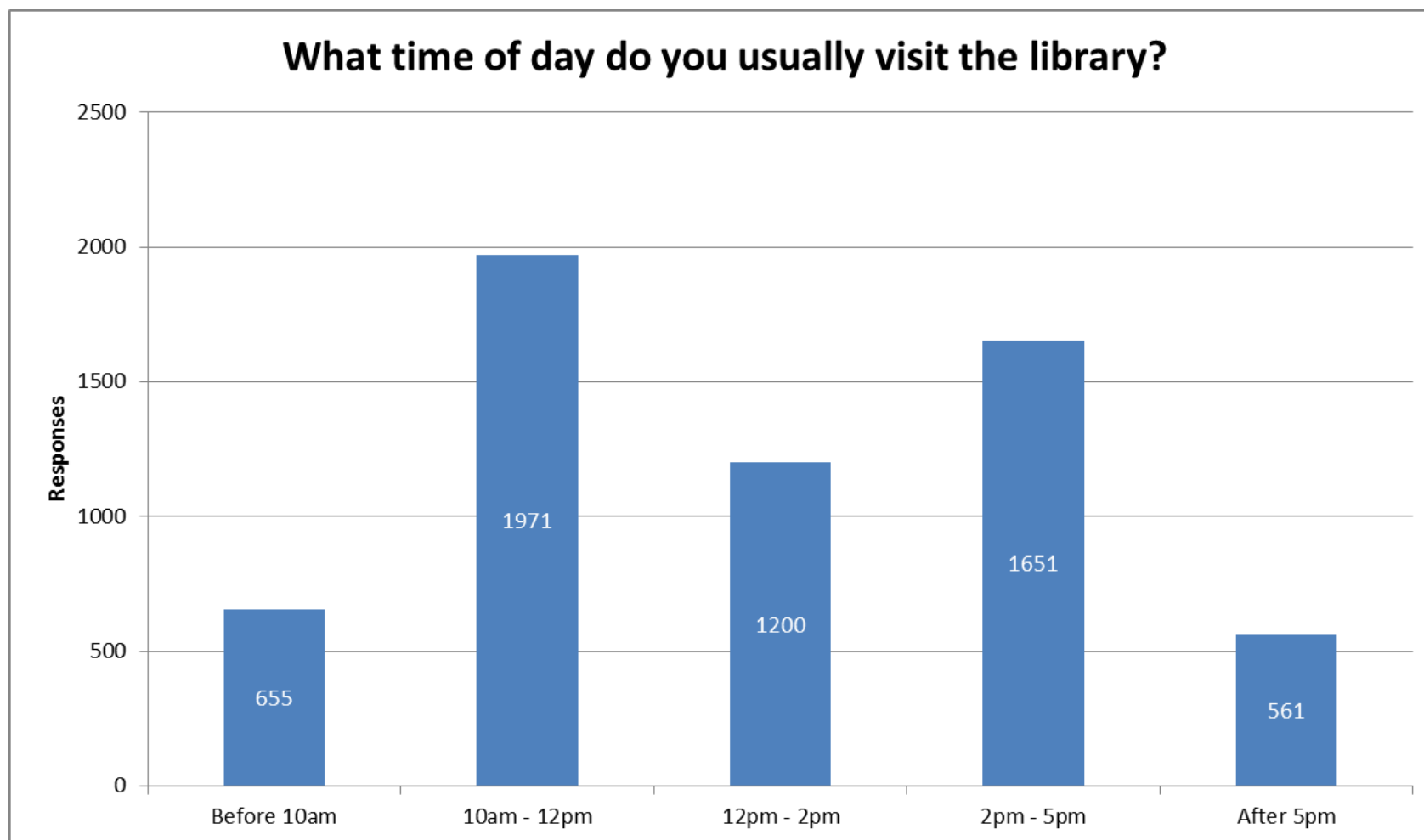


Figure 5.3: Ability to Continue to Visit the Library

This Figure shows responses to the question of whether respondents would have access to a library with the proposed opening hours. The total number of respondents to the questionnaire was 2,970. 497 people did not answer this question.

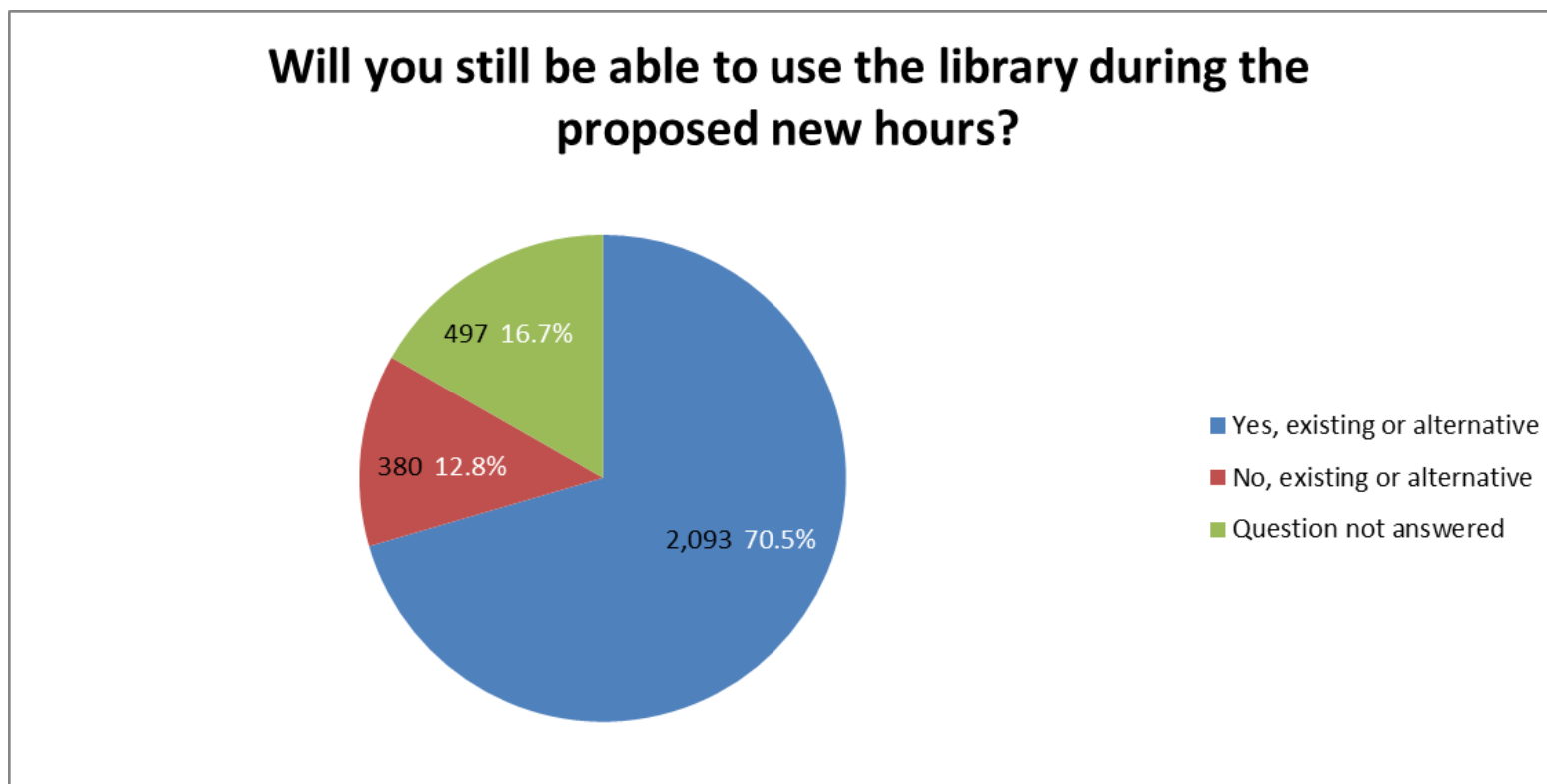


Figure 5.4: Ability to Continue to Visit the Library

This Figure shows respondents who stated that they would or would not have access to a library with the proposed opening hours. Total responses to this question do not equal total survey respondents because some respondents did not answer this question. The total number of responses to this question was 2,473.

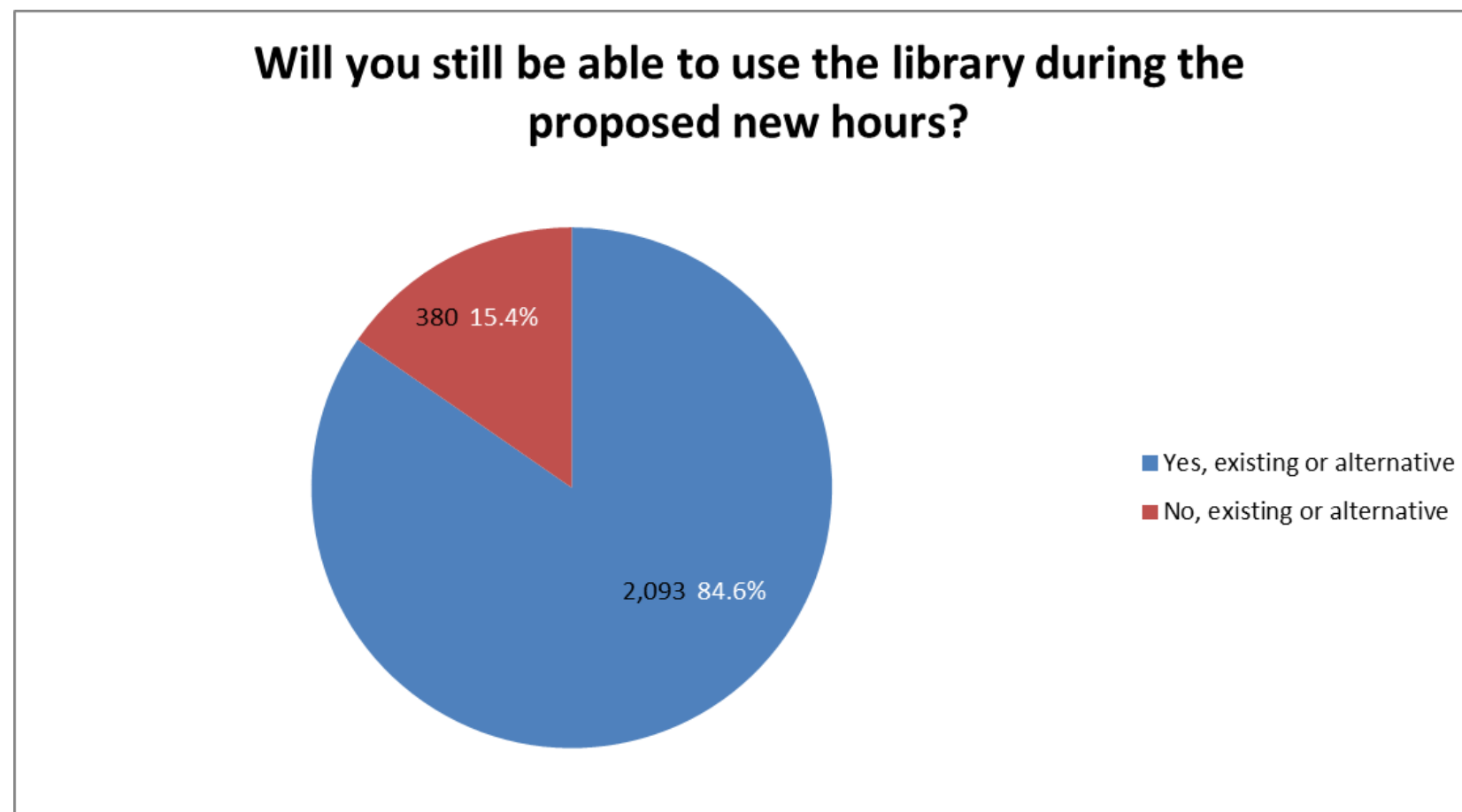


Figure 5.5: Ability to Continue to Visit the Library

This Figure converts the data in Figure 5.4 to show percentage of respondents who stated that they would or would not have access to each individual library with the proposed opening hours. The total number of responses to this question was 2,915.

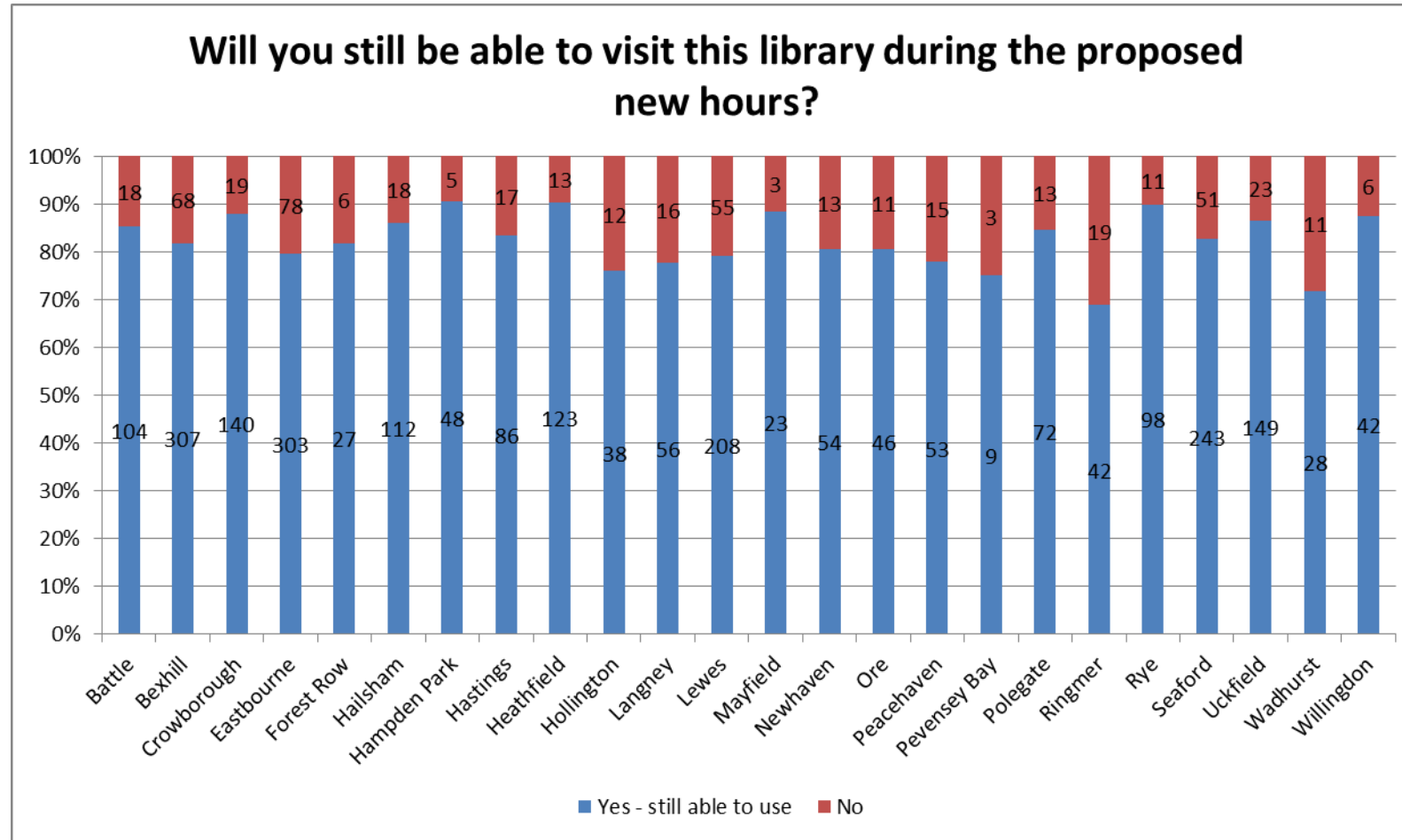


Figure 5.6: Respondents Unable to Visit Libraries with Proposed Opening Hours (by Time of Day).

This Figure shows the present time profile of total library visits by those who stated that they would be unable to visit the library with the proposed opening hours. Total responses does not equal total survey respondents because some respondents referred to more than one time period or more than one library and others did not answer this question. The total number of responses to this question was 886.

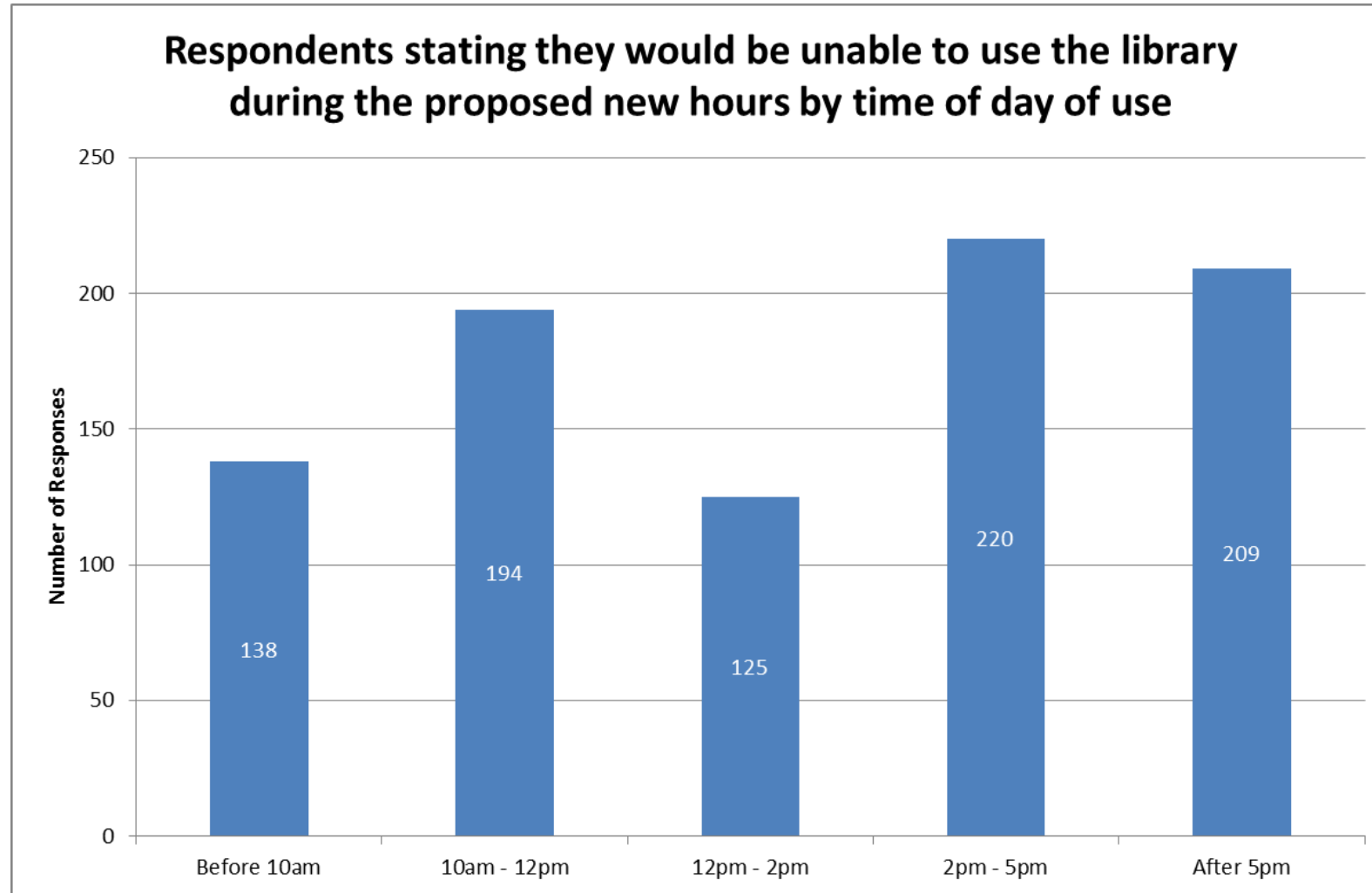


Figure 5.7: Respondents Unable to Visit Libraries with Proposed Opening Hours (by Age).

This Figure shows the present age profile of total library visitors by those who stated that they would be unable to visit the library with the proposed opening hours. Numbers do not total to respondents who said they would be unable to use the service (Figure 5.3) because some respondents opted for 'prefer not to say' and others did not answer this question. The total number of responses to this question was 317.

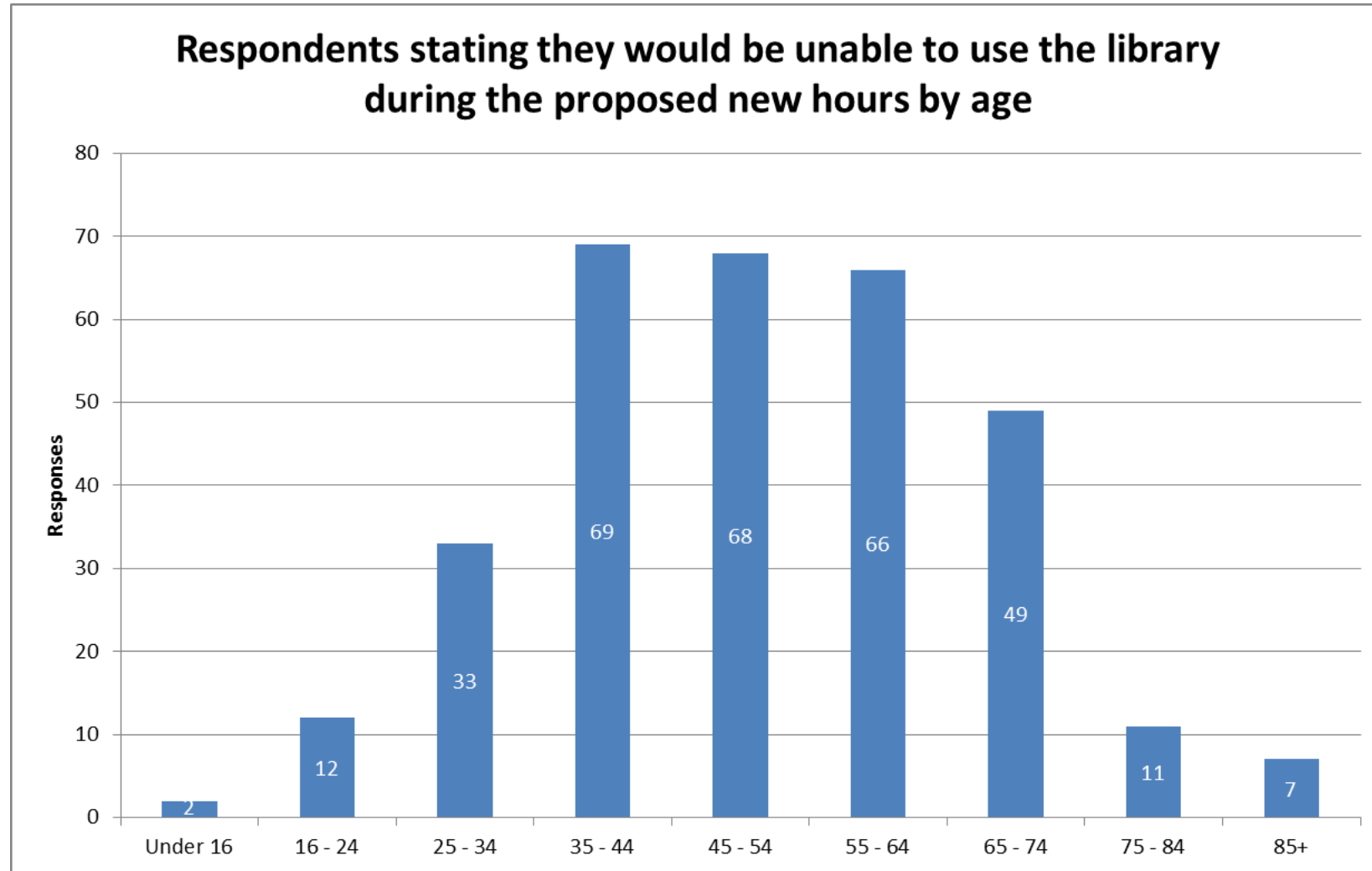


Figure 5.8: Respondents Unable to Visit Libraries with Proposed Opening Hours (by Employment Status).

This Figure shows the employment status of library visitors to each library by those who stated that they would be unable to visit the library with the proposed opening hours. Numbers do not total to respondents who said they would be unable to use the service (Figure 5.3) because some respondents did not answer this question. The total number of responses to this question was 317.

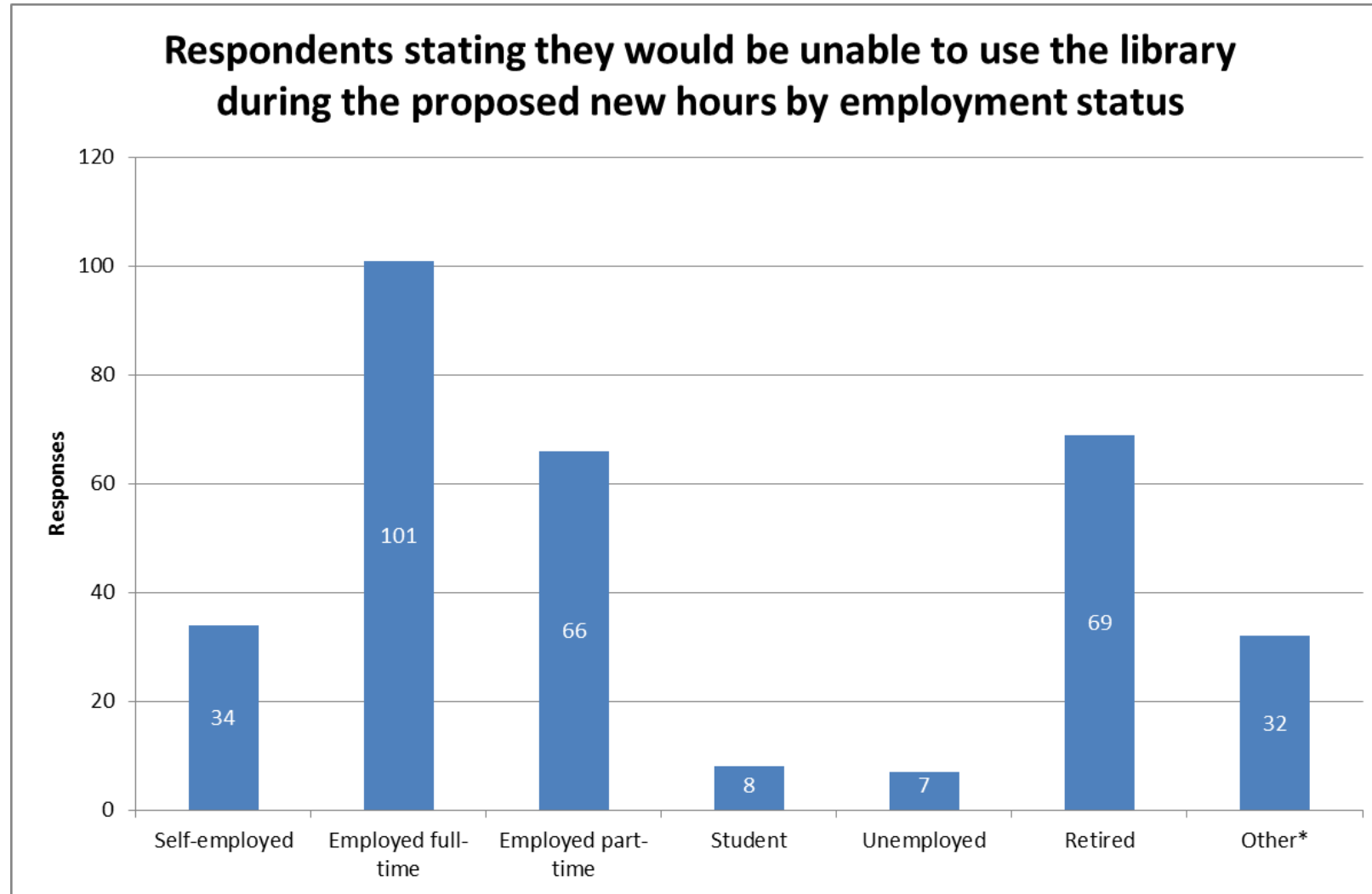
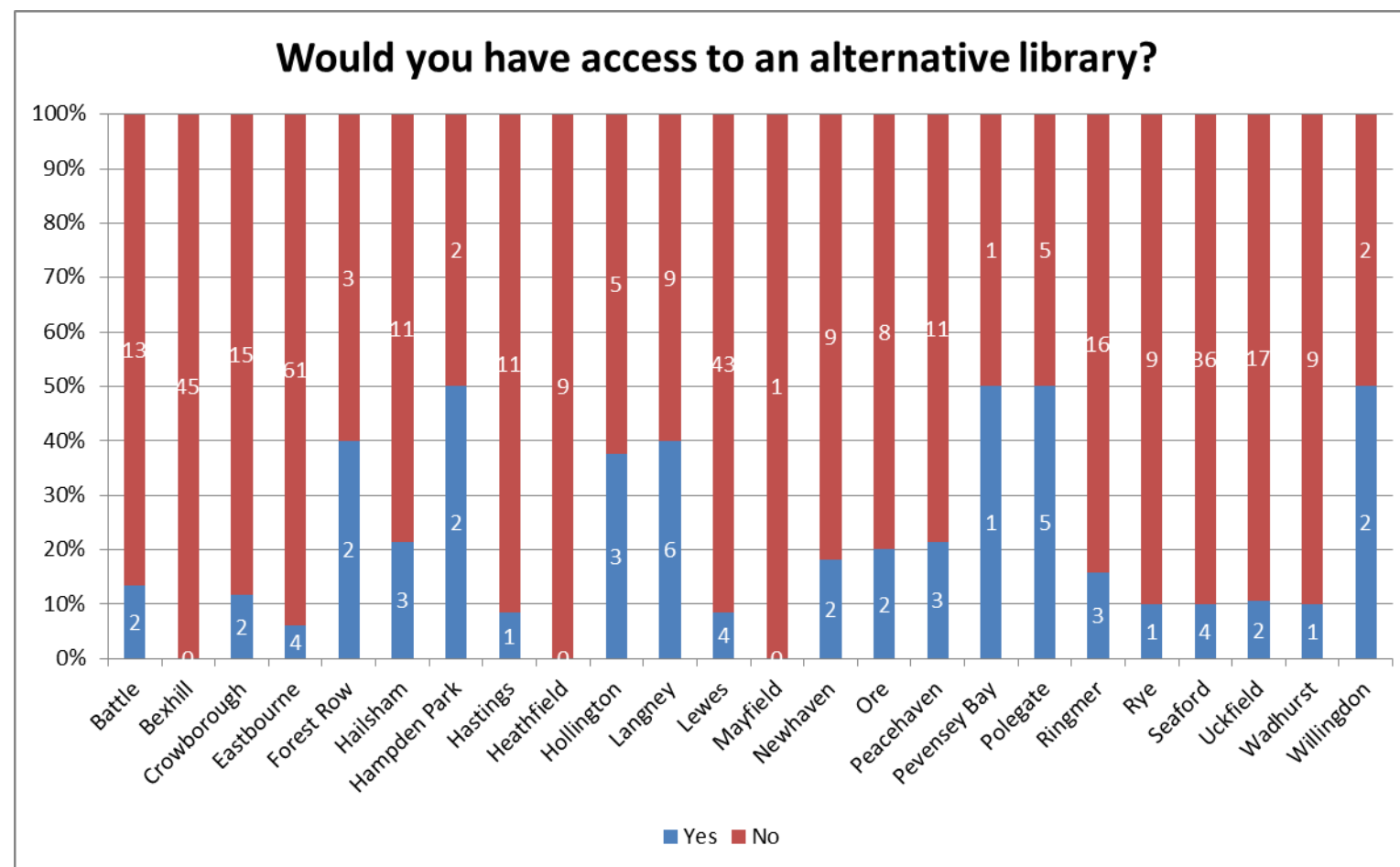


Figure 5.9: Ability to Access an Alternative Library

This Figure shows whether respondents who stated that they would not be able to visit their current library would be able to visit an alternative one. Results are presented by current library. The total number of responses to this question was 406 and 98 respondents did not answer this question.



Cabinet 19 July 2016

Appendix 2 Suggestions and comments received from Library Opening Hours Consultation and by letter and email, with responses and comments from the County Council

As part of the Opening Hours Consultation people were invited to give their general comments or suggestions on the proposals. We also asked whether there were alternative proposals, other than reducing opening hours, that could help achieve the necessary savings. A total of 651 comments were received from the 2,970 respondents. The majority of respondents (77%) had no comment to make on the proposals or were neutral towards them. 4% of comments were positive and 19% were negative.

We are very grateful to all respondents for their feedback and for the range of different ideas put forward. The table below list the general theme of each type of suggestion or comment received and the County Council's response.

Suggestion/Comment	Details	County Council Response/Comment
Better marketing/promotion to get more people to use the library	The most popular suggestion for generating income was to improve marketing/promotion and for libraries to host more events, especially for children. In particular it was suggested that there should be better links with schools.	East Sussex libraries has a presence on social media through its Facebook page and through regular tweets. We issue numerous press releases to highlight the campaigns we run throughout the year to encourage people to take part in events such as the Summer Reading Challenge, which encourages children to keep up their reading during the summer holidays, Books on Prescription, which signposts people to reading material that helps with a range of physical and mental health issues, Black History Month, Reading Ahead, Reading Well, World Book Night, and other events. We also launched a monthly e-newsletter in 2016 which is sent to around 70,000 library members and others who have signed up for information about East Sussex libraries. This helps promote the different services and events that are available, such as the e-library, e-magazines and DVDs. Whilst an increase in the uptake in any of the services we charge for (such as DVD hire) helps generate income, encouraging more people generally to use the library unfortunately does not raise additional income or save money.

		<p>We provide a separate Schools Libraries and Museums Service (SLAMS) which is available to any school within East Sussex and we also provide this as a service for Brighton and Hove Schools, for which Brighton and Hove City Council and their schools pay us. We are developing a long-term, strategic view of what needs our library service should meet over the next five to ten years, called a Strategic Commissioning Strategy and as part of this we will be reviewing SLAMS, including consideration of whether there is a wider role for SLAMS.</p>
<p>Rent out library space, including meeting rooms and/or share libraries with other organisations</p>	<p>This suggestion was about making better use of library facilities especially for community groups, evening classes etc. and to generate income from room hire.</p>	<p>We welcome the range of suggestions made. We have an income generation plan for libraries and the Strategic Commissioning Strategy will include a review of all income generation opportunities and a fundamental review of our buildings, to consider whether libraries could be provided more effectively in shared premises. We work with a number of partner organisations already, including the Citizen's Advice Bureau, the Jobs Hub in Eastbourne library and the Rother District Council information point at Rye library. We receive funding to deliver Learndirect courses, which help people improve their reading, writing, ICT and maths skills, and we have recently secured funding for one year from Job Centre Plus to deliver employment support in the more rural parts of the county. We have received enquiries from several organisations about renting space on a long-term basis within libraries, which we are actively following up. The County Council is also part of a project called SPACES, which is about a number of public sector bodies in the region joining up to make better use of their buildings and facilities and we will continue to progress ideas to share library space with other organisations to make better use of the space.</p> <p>As described above, there is sometimes a very good fit between libraries and partner organisations. However, the space and facility requirements that other organisations often have, or the impact that their customers would have on library users, means that sharing space would not work. In addition, many voluntary and public sector organisations face the same cost pressures that the County Council is under, and the level of income that these arrangements can potentially bring in is usually small in comparison with the costs of running the library service as a whole and</p>

		<p>cannot be guaranteed into the future.</p> <p>As part of our income generation plan we have recently publicised the availability of our meeting rooms and created a new online booking facility, which we hope will result in a significant increase in bookings.</p>
Cafés and coffee shops	There were a large number of suggestions that more cafés and coffee shops would bring in additional income.	Cafés can provide library users with an enhanced experience and make the library more attractive as a place to come to. We know from users of Seaford library that the café is very popular. However, it would not be practical for us to create cafés in all of our libraries because of the limited space. They also require significant investment, and our own experience and the experience of other library authorities is that cafes tend only to make money in big libraries in cities. For these reasons we do not think that cafés and coffee shops would generate the level of savings required to eliminate the need to reduce library opening hours.
Close full days - simplify opening times	The most frequently mentioned idea to cut costs was to close for full days rather than half days. For many people using libraries, this was part of a general wish to have opening times (and closing times) that are easy to remember – although some suggested that this would also save heat and light.	In proposing the new library opening hours we have listened to the views people expressed when providing their comments as part of the consultation. There was no clear view that, in general, people prefer whole day opening and closing rather than half days. For some libraries there was a preference for the library to be open more frequently for fewer hours, whilst some respondents clearly prefer that the library is either open or closed all day. We recognise that many people do have a clear preference for opening hours that are consistent across the week at the same library, and wherever possible we have tried to do this. We agree that there are some benefits in terms of heating for libraries to be open for longer periods at a time, but these benefits are relatively small, and would not save enough money to mean that we could avoid reducing library opening hours, even as part of a package of measures. In addition, half day closures potentially offer greater access as the hours are spread over more days. Taking into account the fact that there is no clear view that people generally support this approach, it is not something that we intend to take forward at this point in time.
Use more volunteers	This was the second most popular cost-cutting option suggested.	We have a wide range of volunteering opportunities with 12 different volunteer roles. We have an excellent and very active volunteer base of well over 300 people who already help us deliver the Home Library Service for disabled and frail people who find it hard to get to a library. Volunteers

		<p>also manage and work in our Bookends store in Eastbourne and help people get online through their role as computer buddies. The Summer Reading Challenge for children is also supported by volunteers many of whom are young people. Respondents to the Opening Hours Consultation were also invited to express an interest if they would like to know more about volunteering opportunities with the service. There was a very good response rate to this and we are extremely grateful to all those who gave us their contact details. They will be contacted with an offer of current volunteer roles within the service. The potential for further avenues of volunteer support, on top of those already used effectively by the service, will be considered as work on the Libraries Strategic Commissioning Strategy proceeds.</p>
Fees and charges	<p>There were various suggestions to introduce or increase charges for services, including having voluntary/compulsory annual membership fees, nominal fees for book loans and charges for using computers.</p>	<p>Legislation prevents us from charging for basic library services such as borrowing books. We charge for overdue items and charge reservation fees as well as for things like photocopying. This year we will be having a campaign to encourage library users to provide us with their email addresses so that we can contact them via email instead of post for things like overdue reminders and reservation notifications, many of which still go out by post. We will also review our reservation charges to ensure that the system of reserving items and having them sent to the library of the customer's choice covers the costs involved.</p> <p>It would be possible to charge for the use of computers. However consideration needs to be given to the numbers of people who are using library computers who may not have access to IT at home and people who rely on library computers to apply for benefits and jobs and may be least able to pay for the service. Charging for computers is something that we will consider as part of our income generation strategy, but is not a measure that we would want to implement now without fully understanding the impacts.</p> <p>Libraries do have the opportunity to charge for events, talks etc. and there are charges in place for some activities. We will consider further opportunities for charging as part of the Strategic Commissioning Strategy. However it is not anticipated that this option would secure the saving</p>

		required even as part of a package of options at the present time.
Close smaller libraries to keep larger ones open for longer	Some respondents suggested that the County Council should focus on the larger libraries and also ensure libraries near to each other have opening hours that complement each other	Prior to bringing forward the proposals to reduce library opening hours we considered whether it would be better to propose closing some of our libraries and keeping the others open for longer. The Strategic Commissioning Strategy that we are working on will aim to ensure that East Sussex has a modern, affordable library service that meets the needs of people who live and work in the county. This is a detailed piece of work that needs to be comprehensive, evidence-based, and not pre-judged. For that reason we do not expect the draft strategy to be ready before July 2017. Only once this review is complete will we know what the future service could look like and how services should be delivered to best meet need. There are no plans to close libraries during the development of our long term strategy for the service.
Donations, sponsorship and bequests	A number of respondents suggested that the Library and Information Service could be supported by donations (both ad hoc and by people donating monthly), as well as from corporate sponsorship and by people leaving money to the service in their wills.	<p>This is an idea of potential interest which we will be reviewing as part of the Strategic Commissioning Strategy. We would need to understand whether both residents and potential sponsors would be interested in this kind of support for our libraries and what levels of funding it might generate in future. We know that there are models for this elsewhere, but we do not know whether they would work here, given that the UK has a very different history from other countries of what is funded by government and the levels of giving by the public and companies. The New York Public library has a very successful campaign of philanthropic giving. It focuses upon individual donors, corporate supporters, and event/restricted giving. There is a comprehensive programme that enables any value of gift to be acknowledged, with a sliding scale of “benefits” depending upon the value of the donation.</p> <p>There are a number of things that the County Council would also need to consider in setting up a charitable giving structure, including charity law, trustees, Gift Aid etc.</p>
Stock	We received some suggestions about concentrating on books, and keeping fewer CDs, magazines etc.	Over the next three years we will reduce spending on library stock by £250,000, bringing East Sussex into line with other comparable library services. This is already part of our £2m savings target and at this stage we do not think that further savings from stock will be possible in the short-term, although we will continue to keep stock spending and the different

		<p>types of materials we purchase under review.</p> <p>We have increased spending on electronic items such as e-books, e-audio books, e-magazines, and online newspapers and reference materials, which are generally more cost-effective for us to provide. We have reduced spending on CDs, which have become less popular, although DVDs still make a profit, with approximately £1 spent on DVDs generating £2 back into the service. In 2015 we reviewed and reduced the newspapers we provide in each library.</p> <p>It is important to remember that our libraries meet a range of different needs in different formats and we seek to ensure that the materials we provide broadly correspond to the different needs that people have.</p>
Sell more merchandise, cards, books, tickets etc.	A small number of respondents suggested this area as an income generation opportunity	<p>ESCC libraries currently sell a small selection of merchandise, including magnifying sheets, greetings cards, stamps, jute bags and memory sticks.</p> <p>Some library services are selling merchandise on a larger scale than East Sussex. The range of merchandise sold in libraries across the UK is varied and covers stationery, cards, reading glasses to new books. In other local authorities income generated varies widely too, but footfall is a consideration when discussing potential for income generated. For example Jubilee library in Brighton sells a large amount of merchandise, but has the second highest footfall for a library in the UK, and has a prime high street location. This has to be offset against the costs of purchasing the items and the staff costs associated with selling them. Because the value of the kinds of items people want to buy in libraries is low, the potential for income generation in the smaller libraries that we have in East Sussex is limited, although there is probably more we could do to improve how prominently and attractively merchandise is displayed.</p> <p>We sell ex-library stock in Bookends, our book shop within Eastbourne library. It is fully managed and run by volunteers, with all ESCC libraries sending Bookends discarded stock as part of the stock policy. Rye and Seaford libraries also have two bays of Bookends which are unstaffed and for which payment is taken at the counter. Bookends is an excellent resource, but it only generates around £6,000-£7,000 per year. It would be</p>

		<p>worth considering whether some Bookends space could be provided in other libraries but it could not be replicated in all of them because we do not have the space. It is not likely, therefore, that we could generate significant additional income by having more stores for ex-library stock.</p> <p>We will review both of these areas, as well as other opportunities for income generation including ticket sales as part of the Strategic Commissioning Strategy.</p>
Fewer staff		<p>Over the three years from 2016/17 we will cut £1m from our annual staffing costs as a result of a staffing restructure to have fewer managers in the Library and Information Service, further efficiencies in staffing libraries, and from the reduction in opening hours, if approved. Whilst we will continue to keep staffing levels under review and seek to ensure the service remains as efficiently run as possible, we do not think that further staffing reductions are possible at present with the library service that we are currently providing.</p>
Increase Council Tax		<p>The budget agreed by Full Council on 9th February included a 3.99% Council Tax increase for 2016/17; this increase was the maximum limit set by Government and was on condition that 2% of the rise is used as a "social care precept" to fund adult care. Any rises over this limit would require a local referendum, which would cost several hundred thousand pounds and, based on the results from other councils that have held such referendums, is unlikely to be successful.</p> <p>The 3.99% increase will raise an additional £9.4m, but even this maximum increase will only go part way to funding the gap between resources and service delivery. With the need to save £70million over the next three years (starting with £20m in 2016/17) we will have to make some extremely difficult decisions which will have an unavoidable impact on frontline services.</p> <p>When setting the budget, rather than reducing funding by an equal proportion across all services, which does not allow for the flexibility of choices afforded by differential savings, we consulted with residents and partner organisations on how we should handle the reduced budget and</p>

		<p>what services should look like. We carefully considered the different views on how services could be provided in future with less money available, and developed our savings plan to protect some services that make a real difference to the most vulnerable people and put us in the best position to deal with continuing financial pressures over the next three years.</p> <p>We recognise that our decisions will have an effect on the community but given the scale of the reductions and the savings required it is simply not possible to continue funding all the services we previously funded.</p> <p>We will continue to lobby Government, directly and through national and regional groups, for a fair deal for counties, the South East, and East Sussex. We remain committed to involving people in decisions that affect them and value their input in planning, delivering and evaluating services through consultations and other feedback.</p>
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Appendix 3 Current Opening Hours and Proposed Future Opening Hours for East Sussex Libraries

The Final Proposals listed below for each library are the opening hours which Cabinet is recommended to approve. If approved, it is expected that the new hours will come into effect in the autumn of 2016 and they will be widely publicised.

The 'Current' opening hours are the times that libraries currently open. The '1st Proposals' are the opening hours for each library that were proposed in the Opening Hours Consultation. In many cases the 1st Proposals and Final Proposals are the same. Any variation between the 1st proposals and Final Proposals is highlighted in blue in the tables below. A summary of the changes for each library is listed at the end of the series of tables.

Battle	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday	Hours per week	% reduction
Current	closed	09:30- 18:30	09:30 - 17:00	10:00 - 17:00	9:30 - 18:30	9:30 - 17:00	40	
1 st and Final Proposals	closed	10:00 - 16:00	10:00 - 13:00	11:00 - 18:00	10:00 - 17:00	10:00 - 17:00	30	25

Bexhill	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday	Hours per week	% reduction
Current	9:30 - 13:00	9:30 - 18:30	10:00 - 17:00	9:30 - 18:30	9:30 - 18:30	9:30 - 17:00	45	
1 st and Final Proposals	10:00 - 13:00	10:00 - 16:00	13:30 - 17:00	11:00 - 18:00	10:00 - 17:00	10:00 - 17:00	33.5	26

Crowborough	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday	Hours per week	% reduction
Current	9:30 - 17:30	10:00 - 17:30	9:30 - 17:30	9:30 - 19:00	9:30 - 19:00	9:30 - 16:00	49	
1 st and Final Proposals	12:30 - 17:00	10:00 - 17:00	10:00 - 14:00	11:00 - 18:00	10:00 - 17:00	10:00 - 17:00	36.5	26

Eastbourne	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday	Hours per week	% reduction
Current	9:30 - 18:30	9:30 - 18:30	9:30 - 18:30	9:30 - 18:30	10:30 - 18:30	9:30 - 17:00	51.5	
1 st and Final Proposals	10:00 - 17:00	10:00 - 17:00	10:00 - 13:00	10:00 - 18:00	10:00 - 17:00	10:00 - 17:00	39	24

Forest Row	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday	Hours per week	% reduction
Current	14:00 - 17:00	closed	10:00 - 13:00	14:00 - 17:00	14:00 - 17:00	10:00 - 13:00	15	
1 st Proposals	closed	closed	10:00 - 13:00	14:00 - 17:00	14:00 - 17:00	10:00 - 13:00	12	20
Final Proposals	14:00 - 17:00	closed	10:00 - 13:00	14:00 - 17:00	closed	10:00 - 13:00	12	20

Hailsham	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday	Hours per week	% reduction
Current	14:00 - 17:00	10:30 - 19:00	9:30 - 17:00	9:30 - 17:00	9:30 - 18:00	9:30 - 17:00	42.5	
1 st and Final Proposals	12:00 - 17:00	12:00 - 17:00	closed	10:00 - 18:00	10:00 - 17:00	10:00 - 17:00	32	25

Hampden Park	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday	Hours per week	% reduction
Current	9:30 - 13:00 14:00 - 17:00	9:30 - 13:00 14:00 - 17:00	closed	9:30 - 13:00 14:00 - 17:00	9:30 - 13:00 14:00 - 17:00	9:30 - 16:00	32.5	
1 st Proposals	10:00 - 13:00	14:00 - 17:00	closed	12:30 - 17:00	10:00 - 17:00	10:00 - 17:00	24.5	25
Final Proposals	10:00 - 13:00 14:00 - 17:00	10:00 - 13:00	closed	10:00 - 13:00 14:00 - 17:00	14:00 - 17:00	10:00 - 16:30	24.5	25

Hastings	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday	Hours per week	% reduction
Current	9:30 - 18:00	9:30 - 18:30	9:30 - 13:00	9:30 - 18:30	10:30 - 18:30	9:30 - 17:00	45.5	
1 st and Final Proposals	10:00 - 17:00	10:00 - 17:00	10:00 - 13:00	10:00 - 18:00	10:00 - 17:00	10:00 - 17:00	39	14

Heathfield	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday	Hours per week	% reduction
Current	9:30 - 13:00	9:30 - 17:00	closed	9:30 - 19:00	10.30 - 17:00	9:30 - 13:00	30.5	
1 st Proposals	closed	10:00 - 17:00	closed	11:00 - 18:00	10:00 - 16:00	10:00 - 13:00	23	25
Final Proposals	10:00 - 13:00	10:00 - 17:00	closed	14:00 - 18:00	10:00 - 16:00	10:00 - 13:00	23	25

Hollington	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday	Hours per week	% reduction
Current	9:30 - 13:00 14:00 - 17:30	9:30 - 13:00 14:00 - 17:30	closed	9:30 - 13:00 14:00 - 17:30	09:30 - 13:00	9:30 - 13:00 14:00 - 16:00	30	
1 st and Final Proposals	10:00 - 13:00	10:00 - 16:00	closed	10:00 - 17:00	10:00 - 13:00	10:00 - 13:00	22	27

Langney	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday	Hours per week	% reduction
Current	closed	9:30 - 17:00	closed	9:30 - 17:00	9:30 - 14:00	9:30 - 17:00	27	
1 st Proposals	closed	10:00 - 17:00	closed	10:00 - 17:00	10:00 - 13:00	10:00 - 13:00	20	26
Final Proposals	closed	10:00 - 17:00	closed	14:00 - 17:00	10:00 - 13:00	10:00 - 17:00	20	26

Lewes	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday	Hours per week	% reduction
Current	9:30 - 19:00	10:30 - 17:00	9:30 - 13:00	9:30 - 19:00	9:30 - 17:00	9:30 - 17:00	44	
1 st and Final Proposals	10:00 - 14:00	10:00 - 17:00	closed	10:00 - 18:00	10:00 - 17:00	10:00 - 17:00	33	25

Mayfield	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday	Hours per week	% reduction
Current	11:00 - 13:00	14:30 - 18:00	closed	14:30 - 18:00	closed	10:00 - 13:00	12	
1 st Proposals	closed	13:30 - 17:00	closed	13:30 - 18:00	closed	10:00 - 13:00	11	8
Final Proposals	closed	14:00 – 17:00	closed	14:00 – 18:00	closed	10:00 – 14:00	11	8

Newhaven	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday	Hours per week	% reduction
Current	9:30 - 16:30	9:30 - 16:30	closed	9:30 - 16:30	9:30 - 16:30	9:30 - 16:30	35	
1 st and Final Proposals	10:00 - 13:00	10:00 - 16:30	closed	10:00 - 16:30	13:00 - 16:30	10:00 - 16:30	26	26

Ore	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday	Hours per week	% reduction
Current	closed	9:30 – 13:00 14:00 - 17:00	9:30 – 13:00 14:00 - 17:00	closed	9:30 - 13:00 14:00 - 17:00	9:30 - 13:00 14:00 - 17:00	26	
1 st and Final Proposals	closed	12:30 - 17:00	10:00 – 13:00 14:00 - 17:00	closed	10:00 - 13:00 14:00 - 17:00	10:00 - 13:00	19.5	25

Peacehaven	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday	Hours per week	% reduction
Current	9:30 - 13:00	9:30 - 17:00	9:30 - 13:00	9:30 - 19:00	10:30 - 17:00	9:30 - 16:30	37.5	
1 st Proposals	closed	10:00 - 15:00	10:00 - 13:00	10:00 - 18:00	10:00 - 16:00	10:00 - 16:00	28	25
Final Proposals	closed	10:00 - 17:00	closed	10:00 - 18:00	10:00 - 17:00	10:00 - 16:00	28	25

Pevensey Bay	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday	Hours per week	% reduction
Current	closed	10:00 - 12:30 14:00 - 17:30	closed	10:00 - 12:30 14:00 - 17:30	10:00 - 12:30 14:00 - 17:30	10:00 - 12:00	20	
1 st Proposals	closed	14:00 - 17:00	closed	10:00 - 12:30 14:00 - 16:00	10:00 - 16:00	10:00 - 13:00	16.5	17
Final Proposals	closed	14:00 - 17:00	closed	10:00 - 13:00 14:00 - 16:00	10:00 - 13:00 14:00 - 16:00	10:00 - 13:30	16.5	17

Polegate	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday	Hours per week	% reduction
Current	9:30 - 13:00 14:00 - 17:00	9:30 - 13:00 14:00 - 17:30	closed	9:30 - 13:00	9:30 - 13:00 14:00 - 17:00	9:30 - 16:00	30	
1 st and Final Proposals	12:30 - 17:00	10:00 - 13:00 14:00 - 17:00	closed	10:00 - 13:00	10:00 - 13:00	10:00 - 13:00 14:00 - 17:00	22.5	25

Ringmer	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday	Hours per week	% reduction
Current	closed	15:00 - 18:00	9:00 - 12:00	13:30 - 16:30	closed	closed	9	
1 st Proposals	closed	13:30 - 17:00	closed	13:30 - 18:00	closed	closed	8	11
Final Proposals	closed	14:00 - 16:00	10:00 - 12:00	14:00 - 16:00	closed	10:00 - 12:00	8	11

Rye	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday	Hours per week	% reduction
Current	09:00 - 17:30	9:00 - 17:30	10:00 - 17:30	9:00 - 17:30	9:00 - 17:30	9:00 - 17:00	49.5	
1 st Proposals	10:00 - 13:00	10:00 - 17:00	10:00 - 16:00	10:00 - 17:00	10:00 - 17:00	10:00 - 17:00	37	25
Final Proposals	10:00 - 17:00	10:00 - 17:00	10:00 - 13:00	10:00 - 17:00	10:00 - 17:00	10:00 - 16:00	37	25

Seaford	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday	Hours per week	% reduction
Current	9:30 - 17:00	9:30 - 17:00	9:30 - 17:00	9:30 - 17:00	9:30 - 17:00	09:30 - 17:00	45	
1 st Proposals	14:00 - 17:00	10:00 - 17:00	10:00 - 13:00	10:00 - 17:00	10:00 - 17:00	10:00 - 16:30	33.5	26
Final Proposals	14:00 - 17:00	10:00 - 17:00	10:00 - 13:00	11:00 - 18:00	10:00 - 17:00	10:00 - 16:30	33.5	26

Uckfield	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday	Hours per week	% reduction
Current	9:30 - 13:00	09:30 - 17:30	9:30 - 19:00	9:30 -17:30	10:00 - 19:00	9:30 - 16:00	44.5	
1 st and Final Proposals	10:00 - 13:00	10:00 - 16:30	14:00 - 16:30	10:00 - 18:00	10:00 - 16:30	10:00 - 16:30	33	26

Wadhurst	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday	Hours per week	% reduction
Current	14:00 - 16:30	closed	10:00 - 12:30	14:00 - 16:30	14:00 - 16:30	10:00 - 12:30	12.5	0
1 st and Final Proposals	14:00 - 16:30	closed	10:00 - 13:00	closed	14:00 - 16:30	10:00 - 13:00	11	12

Willingdon	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday	Hours per week	% reduction
Current	9:30 – 12:00 14:00 - 17:00	closed	9:30 – 12:00 14:00 - 17:00	9:30 – 12:00 14:00 - 17:00	9:30 – 12:00 14:00 - 17:00	9.30 - 12.30	25	
1 st Proposals	10:00 - 13:00	closed	10:00 – 12:00 14:00 - 17:00	14:00 - 17:00	10:00 – 12:00 14:00 - 17:00	10:00 - 13:00	19	24
Final Proposals	10:00 - 13:00	closed	10:00 – 12:00 14:00 - 17:00	10:00 – 12:00 14:00 - 17:00	14:00 - 17:00	10:00 - 13:00	19	24

Rationale for Proposed Future Opening Hours for East Sussex Libraries

In their responses to the Opening Hours Consultation some people asked the Council to consider different opening hours at specific libraries. These comments were carefully examined and have resulted in changes to the proposed opening hours for 11 of the county's 24 libraries. The following list provides an explanation of the rationale for any variation between the changes that were originally proposed and consulted on (the 1st proposals listed above) and the Final Proposals. Table 5.3 in Appendix 1 of the July Cabinet Papers gives a summary of the key issues raised in respondents' comments about the timings of the proposed opening hours, by library. This analysis has helped us to gauge in more qualitative terms, along with the evidence of impact from people's answers to the questionnaire, whether there is sufficient evidence to alter the proposals. It is important to note that to alter the timings of the proposals for a particular library it is necessary to take the provision from elsewhere in the week in order to maintain the required level of saving from each library and overall.

Battle

The final proposals for Battle have not changed from those set out in the public consultation. A range of preferences across the week for desirable opening times were expressed but, on balance, the proposals are felt to be the most appropriate way to meet the necessary reductions while providing a range of suitable times for people to access the library. This is based on our rationale to reduce opening hours at the quietest times while ensuring that those who cannot use the library in core hours are not unfairly disadvantaged, based on our Rationale and Impact Assessment and Equalities Impact Assessment.



Bexhill

The final proposals for Bexhill have not changed from those set out in the public consultation. A range of preferences across the week for desirable opening times were expressed but, on balance, the proposals are felt to be the most appropriate way to meet the necessary reductions while providing a range of suitable times for people to access the library. This is based on our rationale to reduce opening hours at the quietest times while ensuring that those who cannot use the library in core hours are not unfairly disadvantaged, based on our Rationale and Impact Assessment and Equalities Impact Assessment.

A significant number of the comments referred to evening opening and it is proposed that the library will retain one late evening opening.

Crowborough

The final proposals for Crowborough have not changed from those set out in the public consultation. A range of preferences across the week for desirable opening times were expressed but, on balance, the proposals are felt to be the most appropriate way to meet the necessary reductions while providing a range of suitable times for people to access the library. This is based on our rationale to reduce opening hours at the quietest times while ensuring that those who cannot use the library in core hours are not unfairly disadvantaged, based on our Rationale and Impact Assessment and Equalities Impact Assessment.

Eastbourne

The final proposals for Eastbourne have not changed from those set out in the public consultation. A range of preferences across the week for desirable opening times were expressed but, on balance, the proposals are felt to be the most appropriate way to meet the necessary reductions while providing a range of suitable times for people to access the library. This is based on our rationale to reduce opening hours at the quietest times while ensuring that those who cannot use the library in core hours are not unfairly disadvantaged, based on our Rationale and Impact Assessment and Equalities Impact Assessment.

A significant number of the comments referred to evening opening and it is proposed that the library will retain one late evening opening.

Forest Row

There were two comments specifically on library opening times for Forest Row. However, representations were received in response to the consultation from the Parish Council and a petition signed by local residents, who emphasised the importance of the library as a community venue. We have concluded that the proposed hours are the right pattern of hours overall but should be amended to open on Monday afternoon rather than Friday afternoon to coincide with a popular dance class in the building.

Hailsham

The final proposals for Hailsham have not changed from those set out in the public consultation. Four comments were received expressing preferences for opening times across the week but, on balance, the proposals are felt to be the most appropriate way to meet the necessary reductions while providing a range of suitable times for people to access the library. This is based on our rationale to reduce opening hours at the quietest times while ensuring that those who cannot use the library in core hours are not unfairly disadvantaged, based on our Rationale and Impact Assessment and Equalities Impact Assessment.

Hampden Park

Comments on library opening times for Hampden Park referred to 5pm opening, full day opening/closing and consistent hours. We have concluded that the proposed hours should be amended to create an additional whole day opening, by including a 1 hour lunch closure on two consistently timed full weekdays and with a further two half day openings and full day opening until 4.30pm on Saturday.

Hastings

The final proposals for Hastings have not changed from those set out in the public consultation. A range of preferences across the week for desirable opening times were expressed but, on balance, the proposals are felt to be the most appropriate way to meet the necessary reductions while providing a range of suitable times for people to access the library. This is based on our rationale to reduce opening hours at the quietest times while ensuring that those who cannot use the library in core hours are not unfairly disadvantaged, based on our Rationale and Impact Assessment and Equalities Impact Assessment.

A significant number of the comments referred to evening opening and it is proposed that the library will retain one late evening opening.

Heathfield

There were 13 comments on the proposals for Heathfield. A significant number of these referred to the proposed closure on Monday morning. We have concluded that the proposed hours should be amended to open on Monday. It is now proposed that the library will open later on a Thursday instead.

Hollington

There was a small number of comments on the proposals for Hollington. A range of preferences across the week for desirable opening times were expressed but, on balance, the proposals are felt to be the most appropriate way to meet the necessary reductions while providing a range of suitable times for people to access the library. This is based on our rationale to reduce opening hours at the quietest times while ensuring that those who cannot use the library in core hours are not unfairly disadvantaged, based on our Rationale and Impact Assessment and Equalities Impact Assessment.

A significant number of the comments referred to evening opening and it is proposed that the library will retain one late evening opening.

Langney

Comments on the proposals for Langney referred to 5pm opening and all day opening on Saturday. We have concluded that the proposed hours should be amended to open for a full day on Saturday and instead open later on a Tuesday. The library would still opening at 10am on three out of four of the days it is open.

Lewes

The final proposals for Lewes have not changed from those set out in the public consultation. A range of preferences across the week for desirable opening times were expressed. A number of comments referred to all day opening on a Wednesday, where the library is currently open in the morning and the proposal is to close for the whole day. In order to retain Wednesday the library would have to shut at another time to achieve the level of savings. On balance, the proposals are felt to be the most appropriate way to meet the necessary reductions while providing a range of suitable times for people to access the library. This is based on our rationale to reduce opening hours at the quietest times while ensuring that those who cannot use the library in core hours are not unfairly disadvantaged, based on our Rationale and Impact Assessment and Equalities Impact Assessment. A significant number of the comments referred to evening opening and it is proposed that the library will retain one late evening opening.

Mayfield

There were no comments on the proposals for Mayfield. However, based on evidence of the impact of the proposals from the questionnaire results we have concluded that the proposed hours should be amended to shorten the hours slightly on Tuesday and Thursday by half an hour in order to create an extra hour of provision on the Saturday afternoon.

Newhaven

The final proposals for Newhaven have not changed from those set out in the public consultation. A handful of preferences referred to opening until 5pm. On balance, the proposals are felt to be the most appropriate way to meet the necessary reductions while providing a range of suitable times for people to access the library. This is based on our rationale to reduce opening hours at the quietest times while ensuring that those who cannot use the library in core hours are not unfairly disadvantaged, based on our Rationale and Impact Assessment and Equalities Impact Assessment.

Ore

There were no comments on the proposals for Ore and the final proposals have not changed from those set out in the public consultation.

Peacehaven

There were a number of comments on the proposals for Peacehaven, which referred to opening until 5pm. We have concluded that the proposed hours should be amended to open until 5pm on Tuesday and Friday and closing completely on a Wednesday instead. A number of the comments referred to evening opening and it is proposed that the library will retain one late evening opening.

Pevensey Bay

There was a small number of comments on the proposals for Pevensey Bay, referring to opening until 5pm or late. We have concluded that the proposed opening hours are broadly the most appropriate way to meet the necessary reductions while providing a range of suitable times for people to access the library, but that they should be amended to create a consistent lunch hour closure on Thursday and Friday and for the library to open for half an hour longer (until 1.30pm) on Saturdays.

Polegate

The final proposals for Polegate have not changed from those set out in the public consultation. There was little in terms of preferences across the week for desirable opening times expressed and the proposals are felt to be the most appropriate way to meet the necessary reductions while providing a range of suitable times for people to access the library. This is based on our rationale to reduce opening hours at the quietest times while ensuring that those who cannot use the library in core hours are not unfairly disadvantaged, based on our Rationale and Impact Assessment and Equalities Impact Assessment.

Ringmer

There were a number of comments on the proposals for Ringmer, which referred to morning opening on a Wednesday. Representations were also received from the Village Hall Management Committee to open on Saturdays in order to encourage families and working people to visit the library. We have concluded that the proposals should be amended to open for shorter hours over four days in order to open on Wednesday morning and on Saturday.

Rye

There were two comments on the proposals for Rye, which referred to keeping the library open on Monday afternoons.. We have concluded that the proposals should be amended to close earlier on a Wednesday and slightly reduced provision on a Saturday afternoon in order to retain the Monday afternoon provision.

Seaford

A range of preferences across the week for desirable opening times for Seaford were expressed. A number of comments related specifically to a late evening opening, where currently there is no late evening opening. We have concluded that the proposed opening hours are broadly the most appropriate way to meet the necessary reductions while providing a range of suitable times for people to access the library, but that they should be amended to create a late evening until 6pm on Thursday by delaying opening until 11am in the morning.

Uckfield

The final proposals for Uckfield have not changed from those set out in the public consultation. A range of preferences across the week for desirable opening times were expressed but, on balance, the proposals are felt to be the most appropriate way to meet the necessary reductions while providing a range of suitable times for people to access the library. This is based on our rationale to reduce opening hours at the quietest times while ensuring that those who cannot use the library in core hours are not unfairly disadvantaged, based on our Rationale and Impact Assessment and Equalities Impact Assessment.

Wadhurst

The final proposals for Wadhurst have not changed from those set out in the public consultation. There was only one comment on desirable opening times which referred to consistent hours but, on balance, the proposals are felt to be the most appropriate way to meet the necessary reductions while providing a range of suitable times for people to access the library. This is based on our rationale to reduce opening hours at the quietest times while ensuring that those who cannot use the library in core hours are not unfairly disadvantaged, based on our Rationale and Impact Assessment and Equalities Impact Assessment.

Willingdon

There were only two comments on desirable opening times for Willingdon which referred to evening opening. Evening opening is not proposed for those libraries which do not currently have some provision after 5.30pm. However, representations were received in response to the consultation from the Parish Council, who emphasised the importance of Thursday morning provision. We have concluded that the proposed hours are the right pattern of hours overall but should be amended to open on Thursday morning rather than Friday morning to coincide with high footfall in the village at that time.

Notes:

1. There was an error in the calculation of the proposed total weekly opening hours at Pevensey Bay library in the December 2015 Cabinet report. The proposed new opening hours were listed as adding up to 15 hours per week, resulting in a 25% reduction in opening hours. In fact the proposed new opening hours added up to 16.5 hours per week, a reduction of 17%.
2. In the Opening Hours Consultation document there was an error in the current opening times listed for Hampden Park library on a Saturday. It was stated that the library closes for lunch between 13:00 and 14:00 on a Saturday. In fact the library currently opens all day from 9:30 until 16:00. The details for Hampden Park library in the December Cabinet report were correct.
3. In the Opening Hours Consultation document there was an error in the current opening times listed for Willingdon library on a Friday. It was stated that the library closes for lunch between 12:00 and 13:00. In fact the library closes for lunch between 12:00 and 14:00 on a Friday. The details for Willingdon library in the December Cabinet report were correct.

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Cabinet

19 July 2016

Libraries Transformation Programme

APPENDIX 4

Proposed Changes to East Sussex Libraries' Opening Hours

Rationale and Impact Assessment

Summary

This report explains the rationale for a proposal to change the opening hours of the 24 libraries in East Sussex, and summarises the findings of an assessment to evaluate its impact on the public. Between 2016/17 and 2018/19 the Council needs to save between £70 and £90 million. The proposal is one of a number of potential measures we have identified that could save £2 million from the running costs of our libraries and contribute towards the Council's overall savings plan.

The Library and Information Service (LIS) is responsible for 24 libraries plus the mobile library, the library at Lewes prison, an online e-library service, the Schools Library and Museums Service (SLAMS), a volunteer-run home library service and the online database - East Sussex Community Information Service (www.ESCIS.org.uk). The libraries offer a range of services including borrowing services, computer and wifi access, and a variety of advice and training opportunities.

Customer demand for library services in East Sussex is changing. Over the past five years there has been an 87% rise in use of the e-library and a 568% increase in the download of e-books, compared to an 11% decrease in physical visits and a 20% reduction in stock issues. These figures reflect a national trend towards increased use of digital services. Despite these changes, there were still 1.79 million visits to East Sussex libraries in 2015/16, and we have 224,300 library members. The LIS has an extensive network of free computers and internet access (The People's Network). The People's Network is available in every library and last year there were over 320,000 individual sessions. Computer Buddy volunteers support library customers to access and use the internet and other computer functions, both on a pre-booked and drop-in basis.

Our libraries are not well used at all times of the day. We are proposing to reduce the overall amount of hours that all of our library buildings are open to the public. The opening hours proposals focus on reducing library opening hours at quieter times, whilst ensuring that people have access to services across the County when they are most used. It is proposed that libraries will only be open between the hours of 10.00am and 5.00pm, except for those libraries that are currently open later than 5.30pm.

However it is important to highlight that whilst the focus of the proposal is to save money by reducing library opening hours at times when libraries are least well used, we cannot make all the savings we need to make by only reducing opening hours before 10.00am and after 5.00pm. By making some further changes to opening hours, we would retain a comprehensive service. All libraries would continue to be open during the day at varying times throughout the week.

For those libraries which currently open later than 5.30pm it is proposed that these libraries would retain one evening opening until 6.00pm on a Thursday. We are also proposing to introduce evening opening until 6.00pm on Thursdays at Seaford library, which currently closes at 5.00pm throughout the week. Thursday is the busiest evening for our libraries in terms of visitors, transactions such as loans and renewals of items, and use of library computers. Thursday is also the day when most libraries are currently open later, and it tends to coincide with late night opening for shopping. We also think that having the same day each week makes it easier to remember when it is evening opening for libraries. The exception to this is Ringmer library, where in response to public consultation we are proposing not to have a late night opening but instead to open the library on Saturdays and for the library to be open on four days per week instead of the current three days.

Overall the proposal would result in an average reduction to opening hours of our 24 libraries by around 25% across East Sussex and would save us around £500,000 per year.

Public libraries are a statutory service and councils have a legal duty to provide them. By law we must ensure that the service we provide is “comprehensive and efficient”, and if we make any changes to our library service, we must ensure that it remains so. The purpose of undertaking an assessment of the impact of the changes we are proposing is to ensure that our library service would continue to be comprehensive and efficient and meet the needs of our residents and those who work or attend full time education in East Sussex. The law does not say how many libraries East Sussex has to have, or when they should be open. It also does not require our libraries to provide services to every person in the County at all times of the day, but that libraries should be accessible to everyone, using reasonable means. Our duty to provide an efficient library service means that we must make best use of the resources available to us, recognising any constraints which the County Council is facing.

This impact assessment is based on a detailed analysis of the data we hold about how people use our library services and what they have told us about their library usage from new surveys that we have commissioned of our customers, including surveys into who uses our libraries in the evenings. We have also consulted with the public on the proposals, to ensure that we have properly understood and taken into account their impact. Together, all of this data has informed this Rationale and Impact Assessment.

Data from our library management system shows that between 86% and 91% of visits to libraries, use of library computers and WiFi, and loans, renewals and returns of items take place between 10.00am – 5.00pm. The changes we are proposing will enable people to continue to use their library at varied times throughout the week from Monday to Saturday within the core hours of 10.00am to 5.00pm. In addition for those libraries apart from Ringmer that are currently open later than 5.30pm, people would also be able to continue to use these on one evening per week. Most library users are retired, unemployed or work part time, and 95% of customers do not use the library every day.

85% of people who responded to the question in our Opening Hours Consultation asking whether they would still have access to a library if the Council implemented the proposed new opening hours said yes and 15% of people said no. We believe this is because most library users are likely to have the flexibility to visit libraries on varying days and at different times throughout the week, as services at all libraries would continue to be accessible at other times of the week.

We also know from the evening visitor count and surveys we commissioned for the 15 libraries that open during the evening period, that the number of visitors decreases significantly during the course of the evening until closing time. In total, almost 80% of all those we interviewed in the evening survey (from 4.00pm onwards) said they would not be adversely affected (to the point where they would be unable to use the library) by the planned changes.

There will, of course, be impacts on some residents as a result of the proposals. We have undertaken an Equalities Impact Assessment (EqIA) of the proposals to identify what these impacts are likely to be, how they affect people, and what mitigation we can offer to lessen them. Impacts occur where groups of people have less flexibility than others over when they are able to visit libraries. The EqIA identified three main groups to whom this applies: people who work full-time, children and young people who are in full-time education, and people with a disability (especially where they rely on support from another individual or particular services to access the library). Those who work full-time are the most disproportionately affected because of their limited flexibility to use the library during the core hours of 10.00am to 5.00pm on weekdays. However, we know from the results of the consultation and the evening surveys that the level of impact for these groups is small.

There was very little evidence that the libraries were being used as study spaces, with 8.5% of evening users describing themselves as students but only 2% of users saying that access to a study space was the main reason for their visit. 5.6% of visitors interviewed were aged under 16 and 10% were under 25. This does not suggest that reducing evening opening hours would have a disproportionate impact on young people using the library for homework or as a quiet study space.

Our proposals include mitigation for the impact of reductions in library opening hours by prioritising one late evening each week until 6.00pm for those libraries that already have evening provision (as described above), through lunch-time opening, and by all libraries opening on Saturdays. We will still provide 73 hours per week of library opening across the County after 4.00pm on weekdays that will be available to all users including school children and young people and 127.5 hours of library opening on a Saturday.

It is also important to remember that the LIS is a service that extends far beyond library buildings. The existing e-library offers library users the opportunity to access materials such as e-books, e-magazines and audio books online 24 hours a day without the need to visit the library and also to renew loans on items borrowed or place a reservation. Items can also be renewed 24 hours a day by phone using the library helpline. The Home Library Service delivers books and other materials to people who cannot easily use a library due to disability or frailty. If the proposed changes are implemented, we will promote the new opening hours widely in libraries and across the County to make sure people are aware of and are able to easily remember the changes. As part of this we will actively promote the e-library and other means of accessing the library service at alternative times.

We have considered what alternatives there are to reducing library opening hours, which included reviewing all of the different suggestions which people put forward in response to our Opening Hours Consultation. Unfortunately, however, it is not anticipated that the suggestions put forward would secure the level of savings required even as part of a package of measures. We have concluded that we cannot make the proposed savings associated with the reduction to the opening hours from other areas of our overall £2m savings plan. We also considered whether it would be better to propose closing some of our libraries and keeping the others open for longer. We are developing a long-term, strategic view of what needs our library service should meet over the next five to ten years, called a Strategic Commissioning Strategy. This is a detailed piece of work that needs to be comprehensive, evidence-based, and not pre-judged. For that reason it will take us around 18 months to develop and will be drafted by July 2017. Only once this review is complete will we know what the future service could look like and how services should be delivered to best meet need. There are no plans to close libraries during the development of our long term Strategy for the service.

This impact assessment concludes that the needs of the public that are met by using the library would still be fulfilled if we implemented the proposals and reduced opening hours by around 25% on average. We believe that the proposals are proportionate and fair, both in the contribution that they will make to the overall savings the County Council needs to make, and in the way that we propose to reduce opening hours at each library across the County. The proposals will enable us to continue to provide a comprehensive and efficient library service for East Sussex.

1. Introduction

By 2018/19, East Sussex County Council needs to save between £70 million and £90 million. Finding further savings from the services we deliver is getting harder and it will not be possible for us to find this level of savings without cutting some services and delivering other services differently in future.

We have identified that we could save £2 million from the running costs of our libraries and contribute towards the County Council's overall savings plan. We are implementing a Transformation Programme that consists of an initial internal review of the service to ensure that we are running it in the most efficient way possible. We recognise that people's needs from a library service is changing, and will continue to do so. Over the past five years there has been an 87% rise in use of the e-library and a 568% increase in the download of e-books, compared to an 11% decrease in physical visits and a 20% reduction in stock issues. These figures reflect a national trend towards increased use of digital services. Despite these changes, there were still 1.79 million visits to East Sussex libraries in 2015/16, and we have 224,300 library members.

In parallel to the internal review of the service, we are also developing a Strategic Commissioning Strategy, which will provide us with a broad, long-term, strategic view of what will or might be required for our library service in the future.

The development of the draft Strategy will be guided by priority outcomes that will be agreed upon early in the process. By focussing on outcomes, not the existing service, it will enable us to make the best possible use of resources, and develop a modern and sustainable library service.

2. The Proposals

A detailed analysis of current library usage in East Sussex shows that our libraries are not well used at all times of the day. We are proposing to reduce the overall amount of time that all of our library buildings are open to the public. The opening hours proposals focus on reducing library opening hours at quieter times, whilst ensuring that people have access to services across the County when they are most used. It is proposed that libraries would only be open between the hours of 10.00am and 5.00pm, except for those libraries that are currently open later than 5.30pm. These libraries would stay open until 6.00pm on a Thursday. The exception to this is Ringmer library, where in response to public consultation we are proposing not to have evening opening, but instead to open the library on Saturdays and for the library to be open on four days per week instead of the current three days.

Overall the proposal would result in an average reduction to opening hours of around 25% across East Sussex and would save us around £500,000 per year. Whilst the focus of the proposal is to save money by reducing library opening hours at times when libraries are least well used, we cannot make all the savings we need to make by only reducing opening hours before 10.00am and after 5.00pm. By making some further changes to opening hours, it would be possible to retain a comprehensive service across the County. All libraries would continue to be open during the day on various days and at various times throughout the week. The current and proposed opening hours for each library are shown in Appendix 3 to the Cabinet Report.

East Sussex County Council is not the first local authority to do this. Authorities that had broadly similar opening hours to East Sussex libraries have reduced opening hours by approximately 10-25% in recent years in response to usage patterns and as part of wider

cost savings activities. For example, Devon County Council reduced its opening hours by 17% and Cornwall by 24%.

3. Impact Assessment

When deciding what changes to make to public libraries, the Council is legally obliged to abide by the Public Libraries and Museums Act 1964. This law states that public libraries are a statutory service and councils have a legal duty to provide them. We must ensure that the service we provide is “comprehensive and efficient”, and if we make any changes to our library service, we must ensure that it remains so.

The purpose of undertaking an assessment of the impact of the changes we are proposing is to ensure that our library service would continue to be comprehensive and efficient and meet the needs of our residents. The law does not say how many libraries East Sussex has to have, or when they should be open. It also does not require our libraries to provide services to every person in the County at all times of the day, but that libraries should be accessible to everyone using reasonable means. Our duty to provide an efficient library service means that we must make best use of the resources available to us, including any constraints which the County Council is facing.

A detailed analysis was undertaken for the draft Rationale and Impact Assessment of library usage across the 24 libraries in East Sussex for each weekday and Saturday (our libraries are closed on Sundays) for a number of four week periods in December 2014, May 2015 and August 2015. This analysis has been supplemented with the usage data from September to December 2015 to provide a more comprehensive understanding of library usage. The analysis included data from the library management system as well as three statistically representative surveys to understand what services are used, when, and by whom. An evening survey was undertaken in March and April 2016. In addition we undertook a 12 week public consultation on the proposed library opening hours between January and April 2016. The analysis of all of this data has enabled the County Council to assess the need of current library users. This helps us understand the impact of the proposed changes to opening hours, and will also form part of the separate needs assessment relating to the development of the long-term Strategic Commissioning Strategy for libraries. A summary of the evidence gathered for this assessment is provided below. A separate report (Appendix 1 to the Cabinet Report) provides the detailed analysis of the responses to the Opening Hours Consultation. All other analysis is contained in the following pages of this final Rationale and Impact Assessment.

Evidence base	Dates	Summary of work
In-library user surveys	June, August/September and December 2015	Three surveys of library users aged 16 and over were carried out to gather up-to-date information about who is using our libraries and the reasons why. Surveys were carried out in each library and interviewers spoke to people using the library on different days of the week at different times. 1,836 library users were interviewed in the June survey, 2,034 library users were interviewed in the August/September survey and 1,883 users were interviewed in the December survey.
Visitor counts	Dec 14 – Dec 15	Analysis was undertaken of visitor count data that we have at a number of libraries with infra-

		red visitor counting equipment. The libraries used are representative of the different sizes and locations of libraries that we have. This information tells us how many people visit each of these libraries and what time they enter the library for a sample of different months.
Analysis of library usage	Dec 14 – Dec 15	<p>This analysis looked at the times of day when libraries are most used for the issuing and renewal of books and other items, including the use of self-service machines for a sample of different months.</p> <p>As not all of our libraries open after 5.00pm, we also undertook some separate analysis of the patterns of hourly library usage in the 15 libraries that currently open after 5.00pm, to compare them with patterns of usage in all libraries. The aim of this was to see if people used libraries that open later differently, e.g. is there more use later in the day in these libraries, and would we need to understand the impact of that in developing the proposals.</p>
Opening hours consultation	Jan – Apr 2016	This was a three month public consultation on the proposal to reduce opening hours by 25% on average. Consultation questionnaires were available online and in each library. The questionnaire was supported by a document which explained the reasons why the Council was proposing to make the changes and set out the current and proposed new opening times at each library. Respondents were asked a series of questions about how the proposals would affect them in order for us to properly understand the impact of the proposals.
Evening visitor count and user survey	Mar – Apr 2016	In order to provide a comprehensive picture of who uses libraries in the evenings and what they are being used for, we commissioned further surveys at the 15 libraries that currently have weekday opening beyond 5.00pm. The surveys took place in a term-time week in March 2016 and one week in the school Easter holidays in April 2016. The numbers of people entering the library between 4.00pm and closing time were recorded and as many as possible of these visitors were then interviewed. Each interviewee was asked to view the current and proposed opening hours, and give their opinion as to whether or not they would still be able to make effective use of the library.

In addition to library user surveys and analysing the data we hold, we have undertaken an Equality Impact Assessment (EqIA) of the proposals to change library opening hours. The findings of the EqIA have helped us understand what impact, if any, these proposals would have on equalities, and this is summarised later in this report.

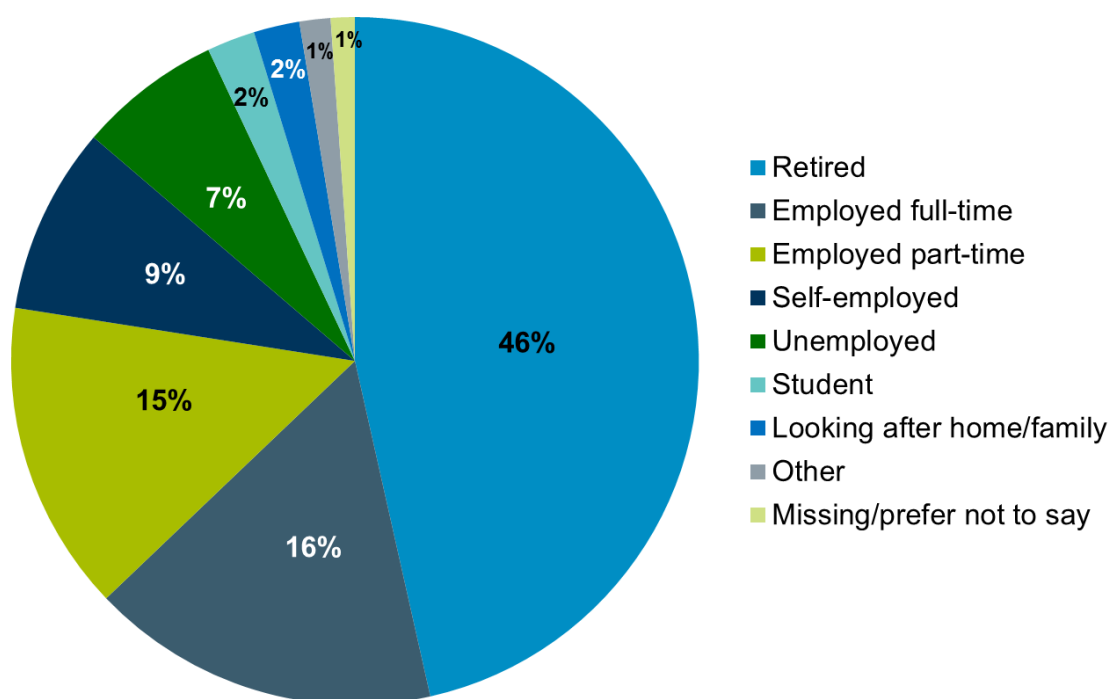
Who uses our libraries?

In-library user surveys (June, August/September and December 2015)

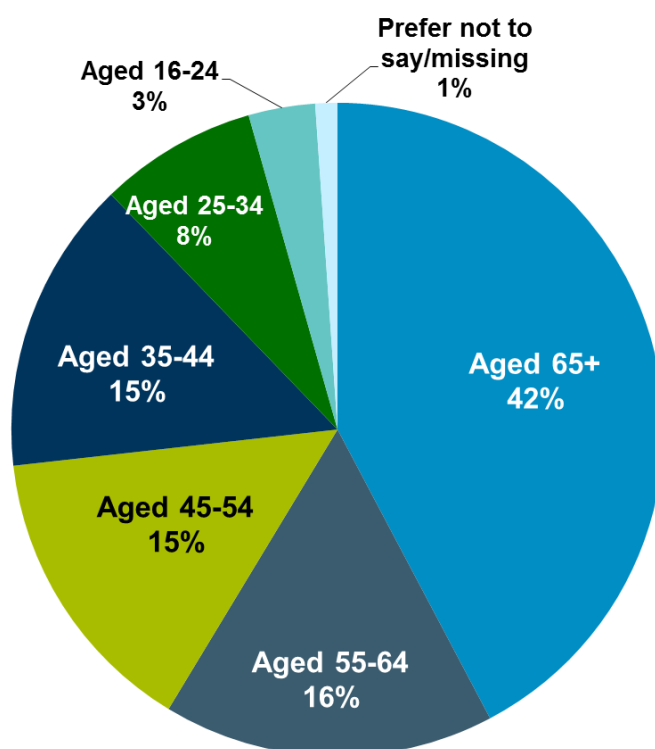
In June 2015 we carried out a survey of 1,836 current library users aged 16 and above at all libraries across East Sussex. This user survey was repeated in August/September 2015 and in December 2015. 2,034 library users were interviewed as part of this survey in August and September and 1,883 users were interviewed in December. The graphs in this section (Graphs 1-5) show the combined results for all three sets of surveys.

Graph 1 below shows who the users of East Sussex libraries are. Almost half of library users (46%) were retired people and in total 70% of users were people who were either retired, worked part time, were unemployed or were students, and who were therefore able to use libraries at different times of the day. 2% of the 70% of users were students. 16% of respondents worked full time.

Graph 1: Employment status of East Sussex library users



Graph 2: Age of East Sussex library users (16+)

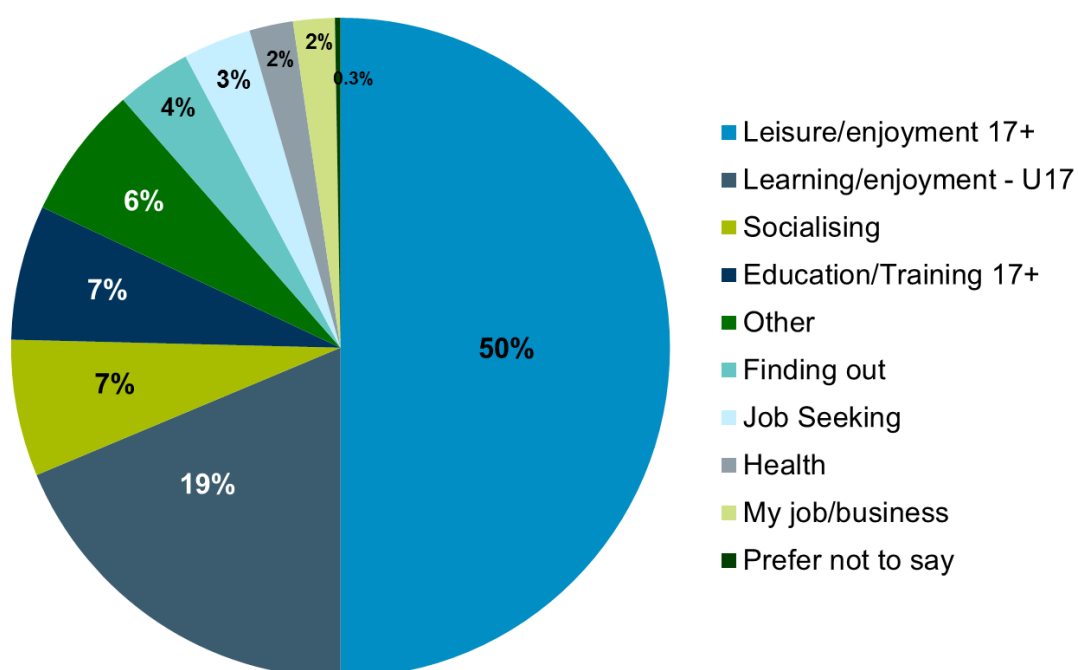


As would be expected with a large proportion of retired customers, 42% of library users were aged over 65, with almost 60% of those surveyed aged 55 or above. 38% of library users were aged between 25 and 55, and only 3% of those surveyed were under 25 years of age. It is to be expected that a small proportion of library users were under 25 in these surveys as they were aimed at people over 16. However, we know from our library management system that around 35% of active library users (those who have used the library service in the past 12 months) are children and we gathered extra information about users of the libraries who were aged under 25 in our evening users surveys, which included all age groups of users.

Why do people use our libraries and what services do they use when they visit?

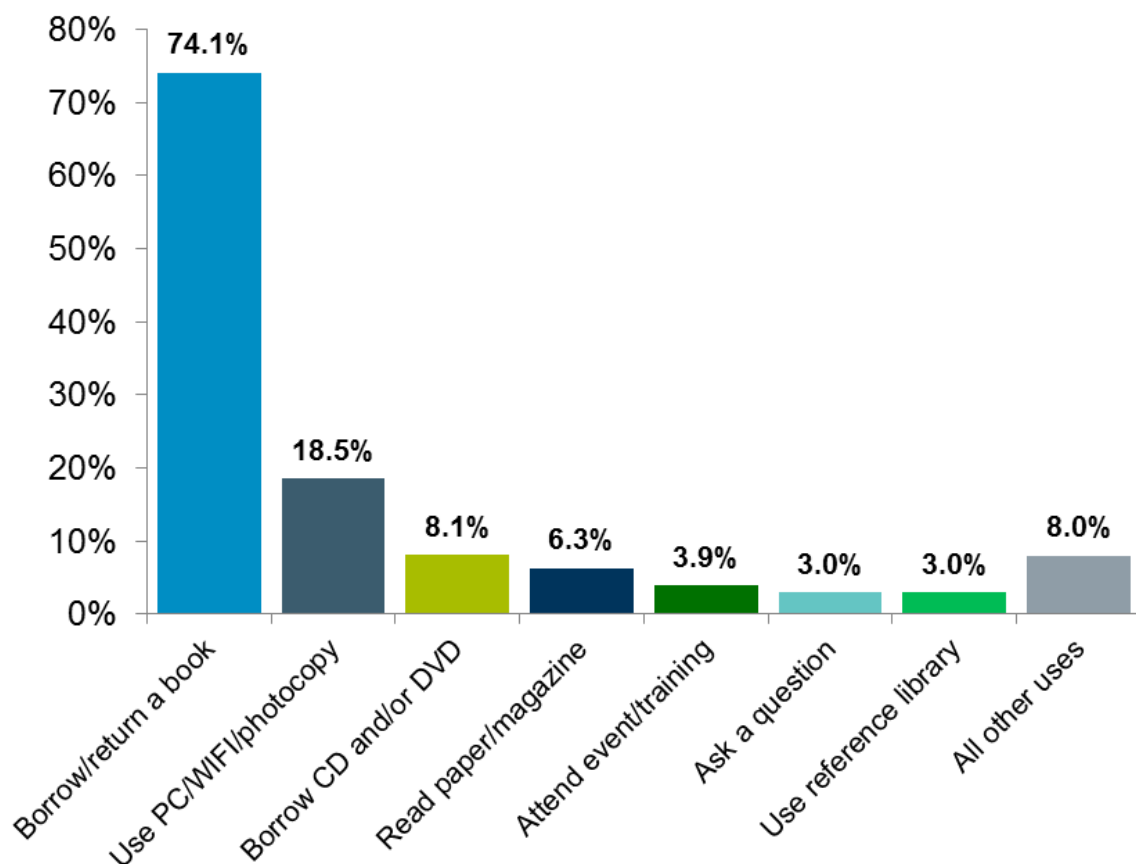
More than two thirds of people (69%) visited the library for pleasure, including visits aimed at providing leisure and enjoyment for children. A further 7% visited the library for socialising. Only 10% of visitors were using the library to help with job seeking or in connection with adult education and training. Graph 3 shows all of the reasons people visited the library.

Graph 3: Will your visit today help with any of the following?



In terms of the services used in the library, 74% of customers were visiting the library to borrow, return, renew or reserve a book. The next most common reason for using the library was to access the library computers or the library WiFi. A small proportion of users (8% or fewer) used the library to either borrow, return, renew or reserve a DVD or CD, to read a newspaper or magazine, or to use reference materials.

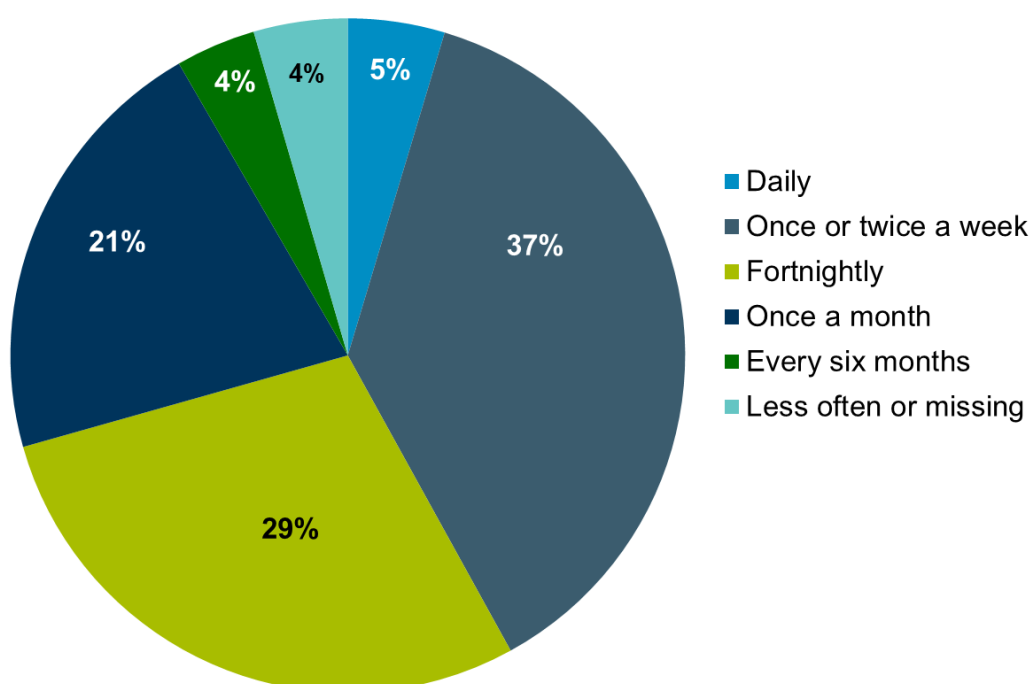
Graph 4: What services are you planning to use today at the library?



How often do people visit our libraries?

Most people surveyed visited their library at least once a fortnight, with the highest frequency of visits being once or twice a week. Around one fifth of people visited the library once a month. Only 5% of users said they visited the library every day.

Graph 5: How often do you visit this library?



What times of the day do people visit our libraries?

Visitor counts (December 2014, May 2015 and August - December 2015)

We analysed the data from our people counters to see the times of day that people visit a sample of our libraries. These counters count the number of visitors entering the library, but do not record how long they stay.

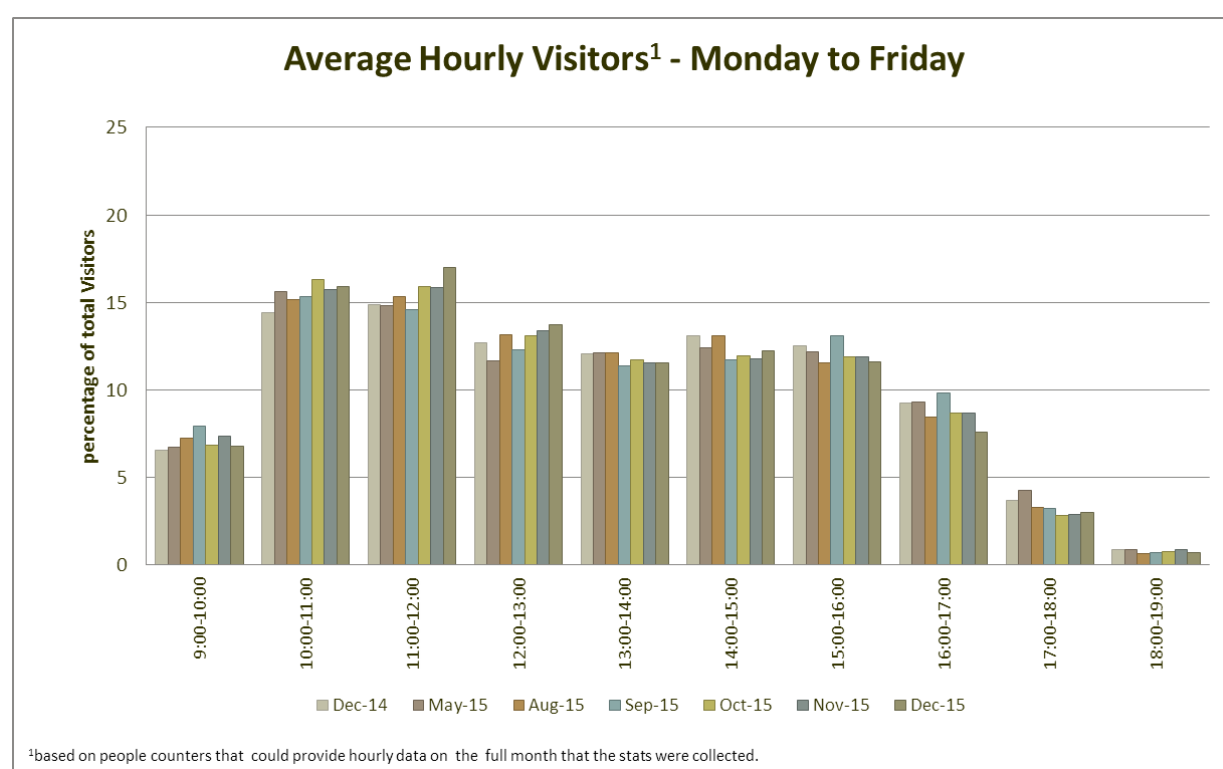
We used the people counters at Crowborough, Eastbourne, Newhaven, Seaford, Ore and Rye libraries for all of this analysis, as they have thermal imaging cameras which are accurate and can give us hourly visitor counts. In September a further five thermal imaging cameras were introduced in Bexhill, Hailsham, Langney, Lewes and Peacehaven and so we were able to analyse visitor numbers from these libraries for September to December 2015 as well. These libraries are representative of the different sizes and locations of libraries that we have. Analysis covered:

- Early morning library use before 10.00am
- 10.00am to 5.00pm (core hours)
- Late afternoon and evening use after 5.00pm

By analysing and comparing data for library usage across these seven months, we were able to compare patterns of library usage in school term time as well as during school holidays. Overall there was little seasonal variation, as can be seen in the following graphs.

The vast majority of library visits (88-90%) took place in the core hours of 10.00am to 5.00pm on a weekday. Between 7-8% of visits took place before 10.00am. More than twice the number of people visit the library between 10.00am and 11.00am than between 9.00am and 10.00am on a weekday. On Saturdays twice the number of visits took place between 10.00am and 11.00am than between 09.00 and 10.00am. In terms of evening opening, only 4-5% of weekday visits were after 5.00pm. The results were similar across the seven months.

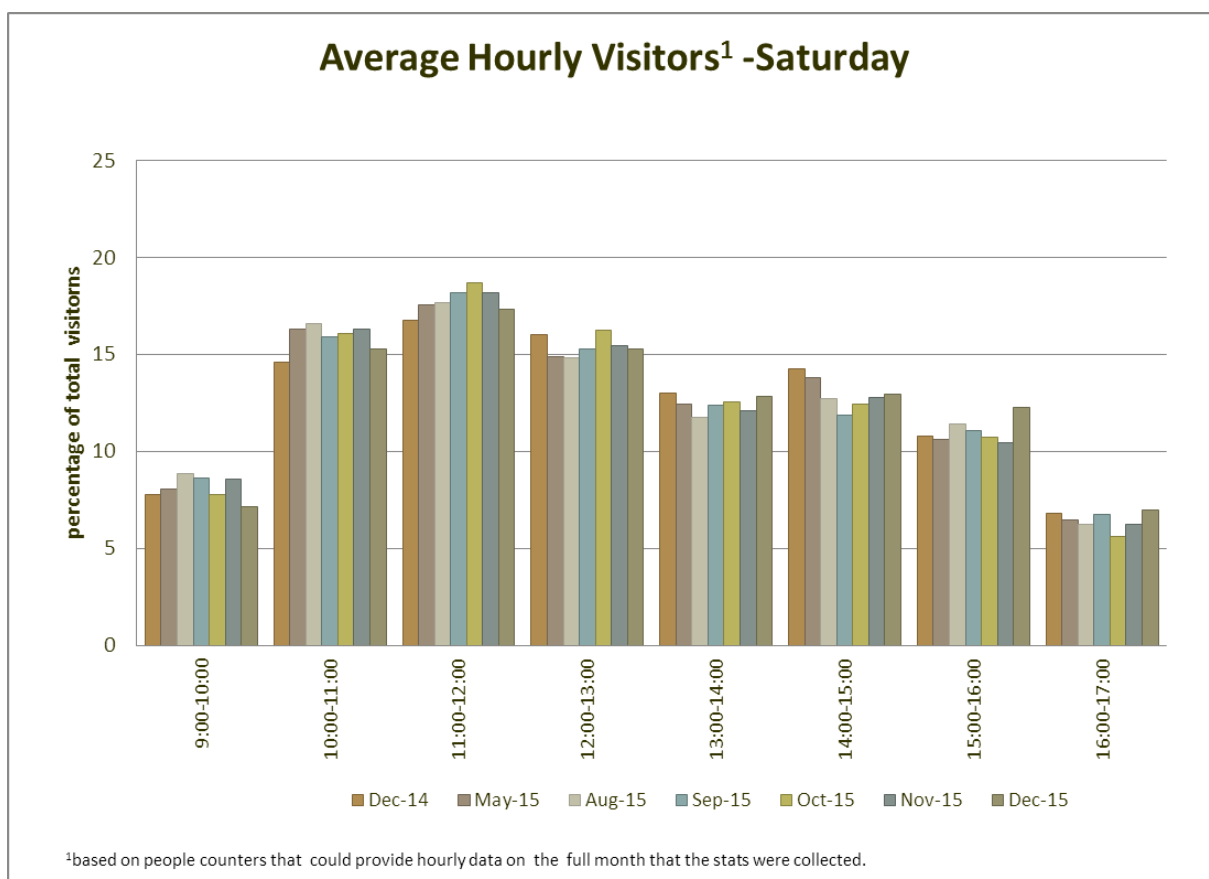
Graph 6: Average hourly visitors on weekdays - December 2014, May 2015 and August to December 2015



Analysis based on those libraries with thermal imaging cameras only

On Saturdays 91-93% of visits took place between 10.00am and 5.00pm. 7-9% of visits took place before 10.00am. Libraries close no later than 5.00pm on Saturdays. Graph 7 shows the hourly breakdown of visits on Saturdays.

Graph 7: Average hourly visitors on Saturdays - December 2014, May 2015 and August to December 2015



Analysis based on those libraries with thermal imaging cameras only

What services are used at different times of day?

In-library transactions (December 2014, May 2015 and August - December 2015)

The impact assessment has analysed the times of the day (Monday-Friday and Saturday) when libraries are used for the key services they provide, including:

- Issuing and renewal of books and other items, including use of the self-service machines
- Use of the library computers (this is known as the People's Network)
- Use of WiFi within libraries

This data has been taken from our library management system. As with the analysis above for the times when people visit our libraries, this analysis has also been undertaken for each weekday and Saturday for the same four week periods in December 2014, and in May, August, September, October, November and December 2015, and was again broken down

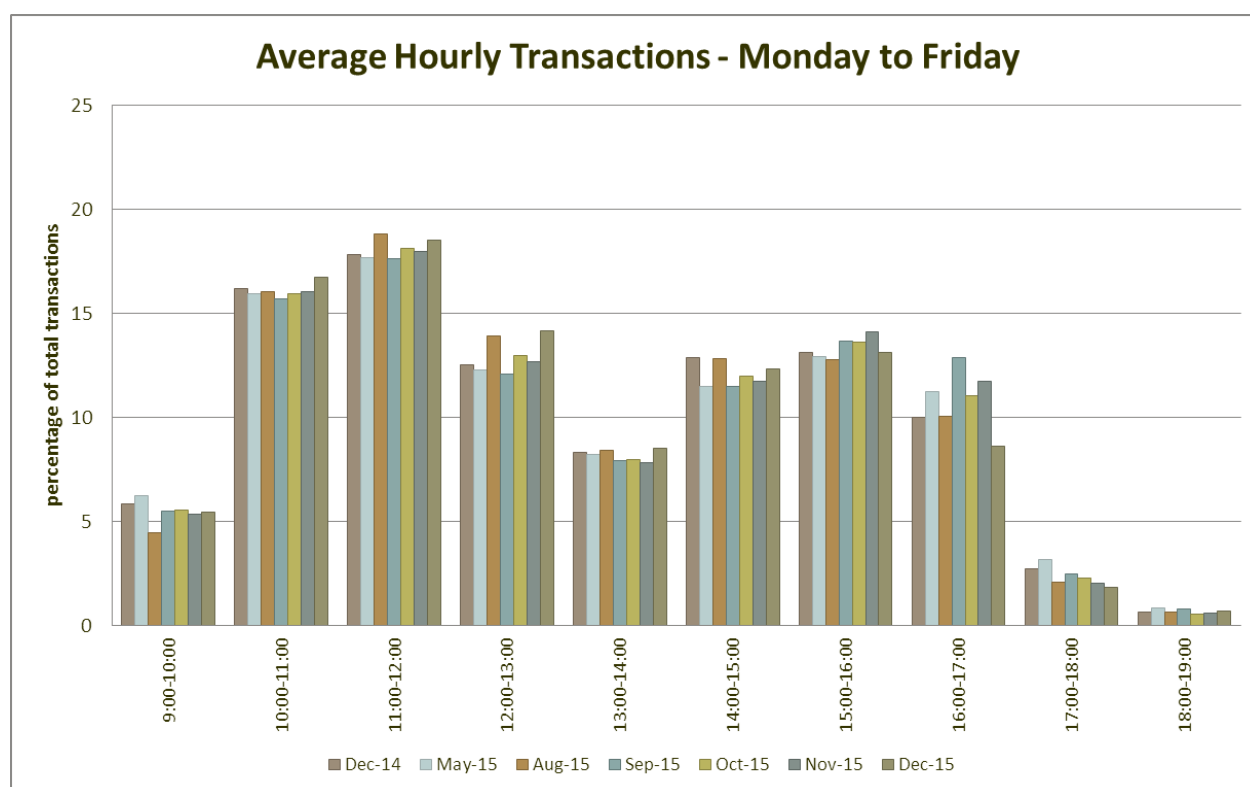
by early morning library use before 10.00am, 10.00am to 5.00pm (core hours), and late afternoon and evening use after 5.00pm. There are quite consistent patterns of usage throughout the year with little evidence of any seasonal effect.

Issuing and renewal of books and other items

This analysis looked at the times of day when libraries are most used for the issuing and renewal of books and other items, including the use of self-service machines. We analysed the data from all of our libraries for this period. The results in Graph 8 show that between 90% and 93% of all weekday transactions of this kind take place between 10.00am and 5.00pm. This pattern was consistent over all seven months.

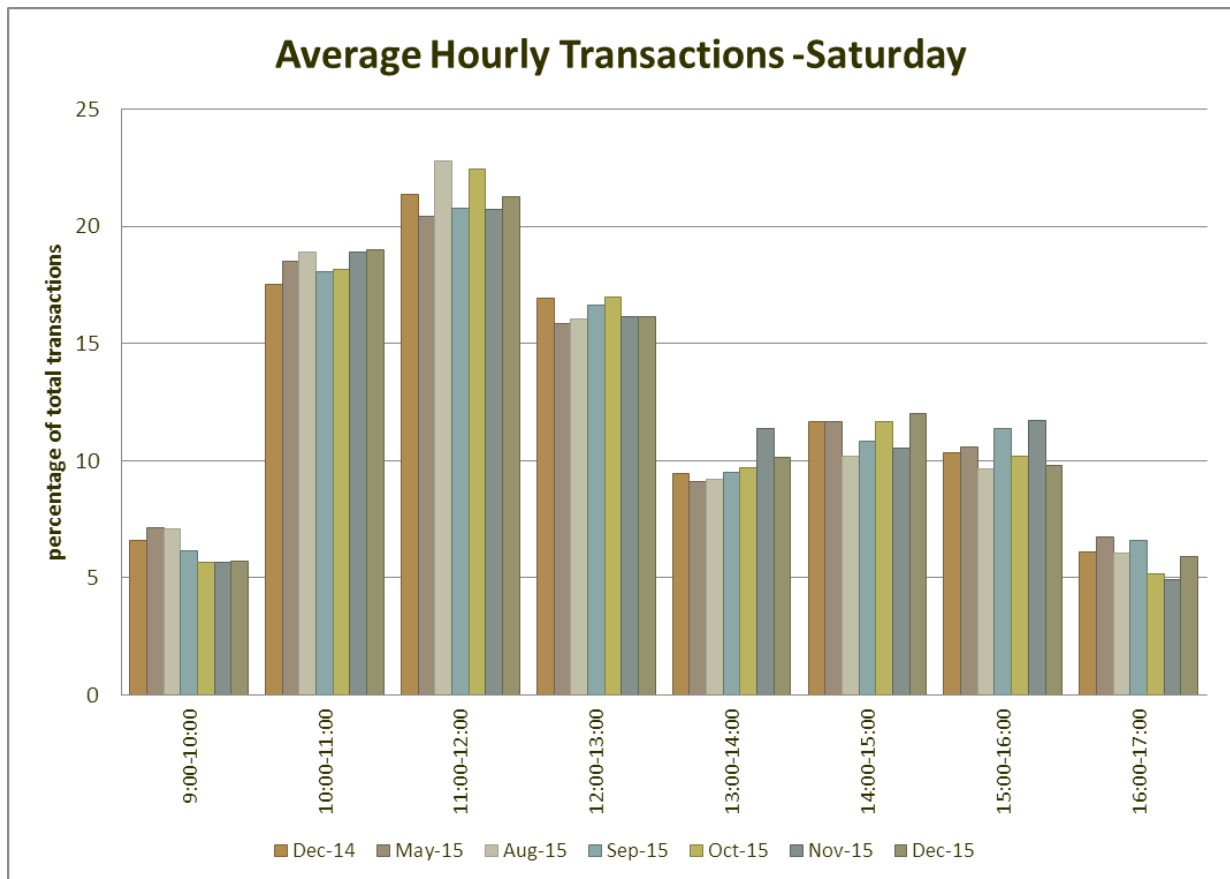
Only around 4-6% of issues and renewals are made before 10.00am and between 3% and 4% of them take place after 5.00pm. We would expect issues and renewals to be low before 10.00am as our libraries do not open until at least 9.30am. However, many libraries have opening hours until 6.00pm, 6.30pm or even 7.00pm and issues and renewals are comparatively low after 5.00pm.

Graph 8: Average hourly countywide transactions (issues, renewals and self-service issues) on weekdays December 2014, May 2015 and August to December 2015



Graph 9 (below) shows that on Saturdays a higher percentage of issues and renewals take place between 10.00am and 5.00pm (93-94%) than on weekdays. Again, this was very consistent across the seven months and is to be expected as libraries do not open after 5.00pm on Saturdays. Between 6% and 7% of issues and renewals were made before 10.00am on Saturdays, slightly higher than on weekdays. There is no analysis of transactions after 5.00pm on Saturdays for the reason stated above.

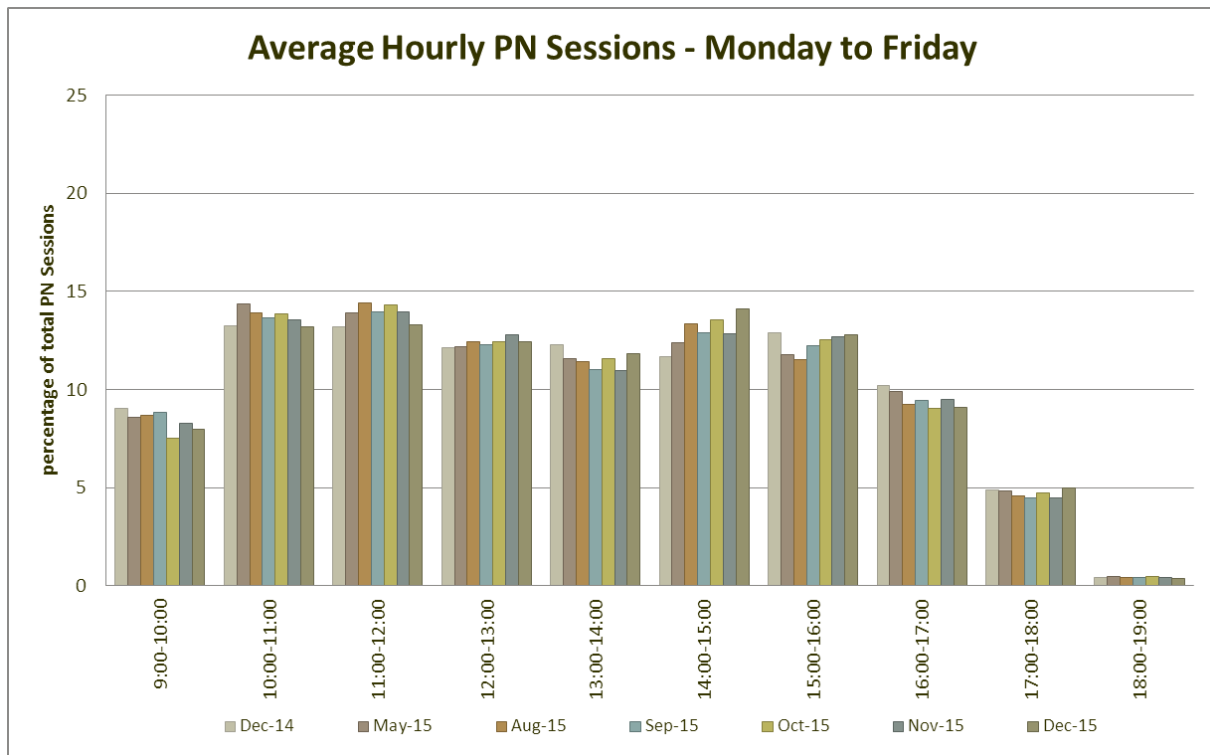
Graph 9: Average hourly countywide transactions (issues, renewals and self-service issues) on Saturdays - December 2014, May 2015 and August to December 2015



Use of library computers (the People's Network)

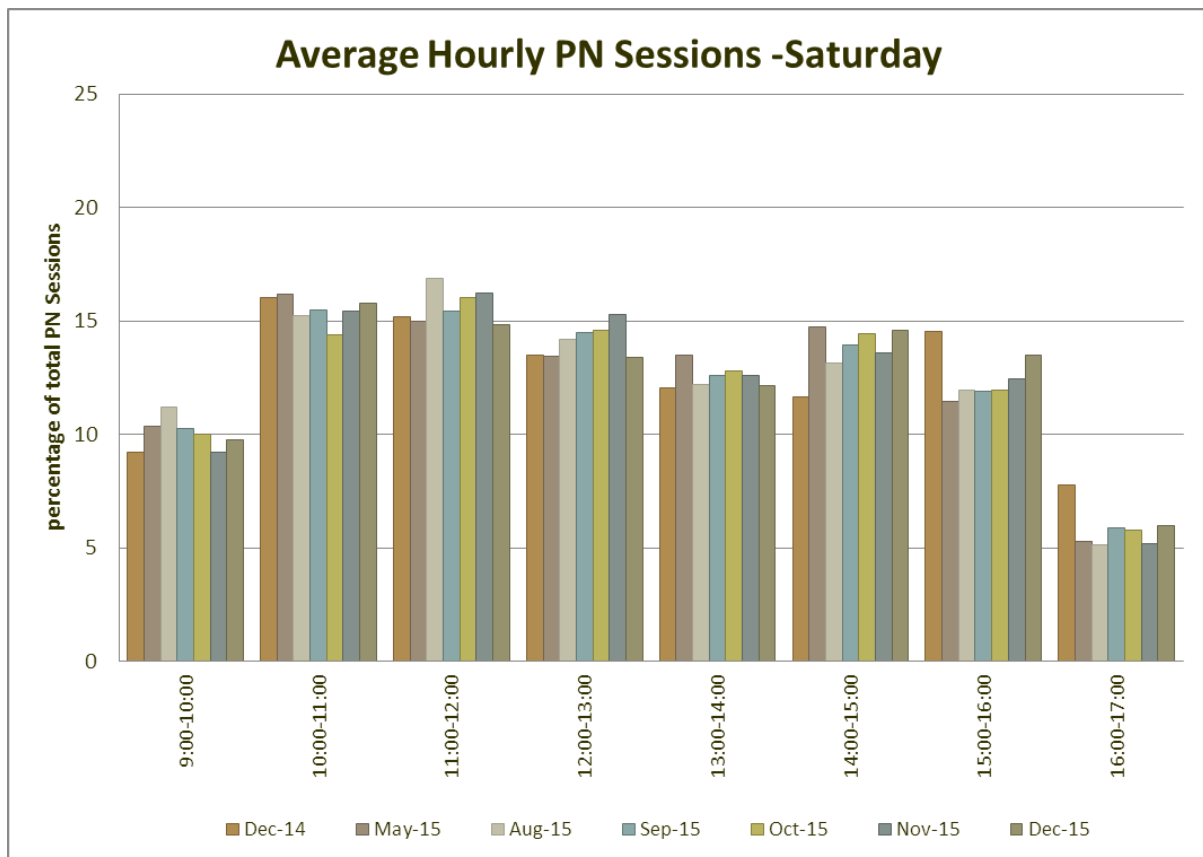
This analysis looked at the times of day when our People's Network library computers are most used. These are the desktop computers in our libraries that the public can log onto. We analysed the data from all of our libraries over seven months. The results in Graph 10 show that between 86% and 87% of all weekday People's Network sessions were between 10.00am and 5.00pm. This pattern was highly consistent over the seven months. Only 8-9% of People's Network sessions were before 10.00am and between 4% and 5% of them take place after 5.00pm.

Graph 10: Average hourly countywide People's Network sessions on weekdays - December 2014, May 2015 and August to December 2015



On Saturdays, between 89% and 91% of library computer use takes place between 10.00am and 5.00pm. Between 9% and 11% of People's Network sessions were before 10.00am on Saturdays. There is no analysis of People's Network sessions after 5.00pm on Saturdays because none of our libraries open after 5.00pm. The hourly breakdown of results can be seen in Graph 11 below.

Graph 11: Average hourly countywide People's Network sessions on Saturdays - December 2014, May 2015 and August to December 2015

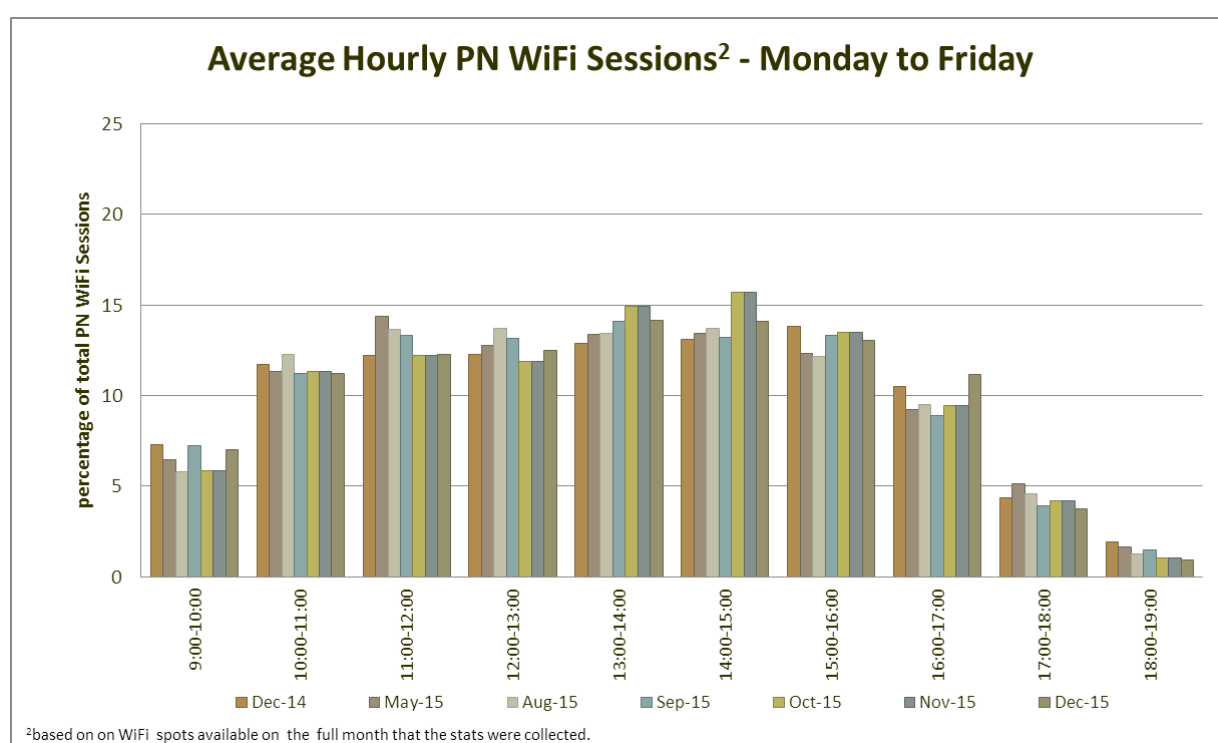


Use of library WiFi

We have looked at patterns of WiFi usage in our libraries from Monday to Friday and on Saturdays at the libraries that had WiFi provision during all or part of the months in question. These were Bexhill, Lewes, Eastbourne, Newhaven, Seaford, Hailsham, Peacehaven and Rye. However, during the remainder of 2015 and early 2016 we have rolled out WiFi to all of the remainder of our libraries.

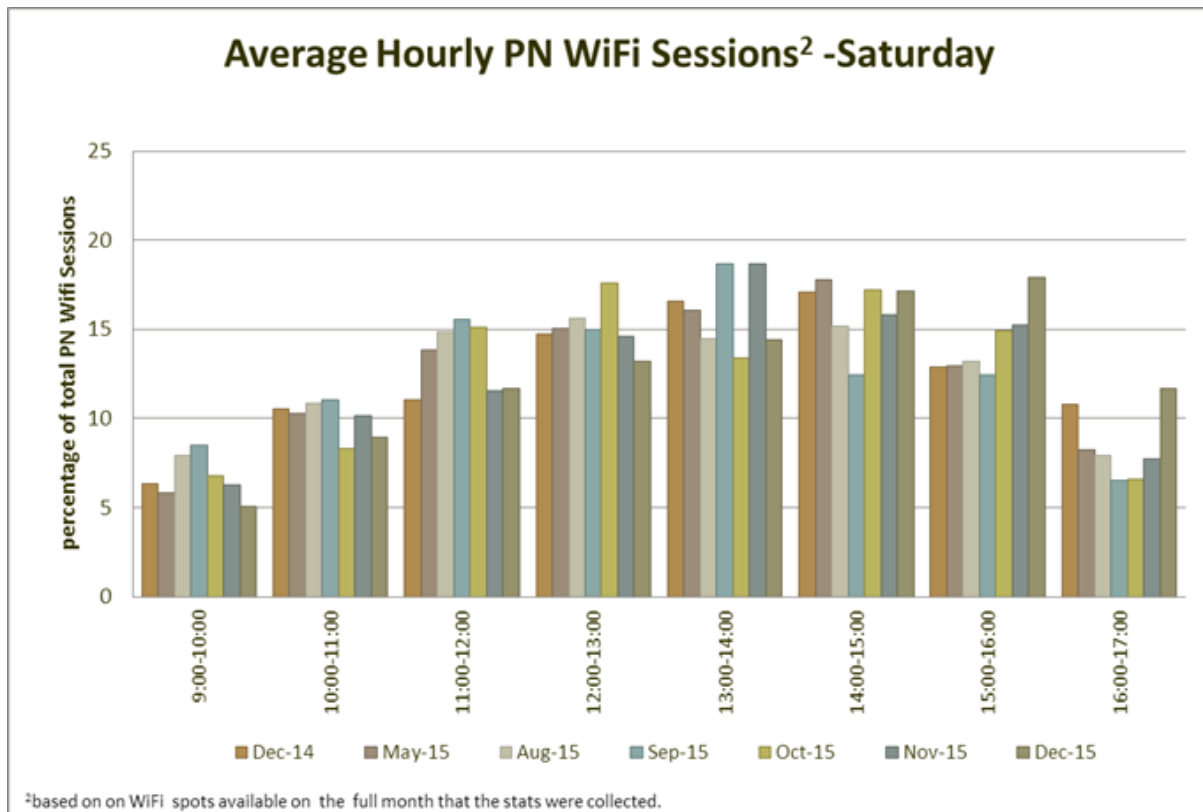
The results show that between 86% and 89% of all weekday WiFi sessions were between 10.00am and 5.00pm across the seven months we looked at. Between 6% and 7% of WiFi sessions were before 10.00am and 5-8% of them took place after 5.00pm. Graph 12 shows the hourly breakdown of usage.

Graph 12: Average hourly WiFi sessions on weekdays - December 2014, May 2015 and August to December 2015



On Saturdays the results were similar to the patterns of usage for other library services, in that proportionately more WiFi sessions took place in the core period of the day. This is to be expected as libraries close no later than 5.00pm on Saturdays. The results show that 92-95% of Saturday WiFi sessions were between 10:00 and 5.00pm. There were between 5–8% of WiFi sessions before 10.00am. Graph 13 shows the hourly breakdown of WiFi usage on Saturdays.

Graph 13: Average hourly countywide WiFi sessions on Saturdays - December 2014, May 2015 and August to December 2015



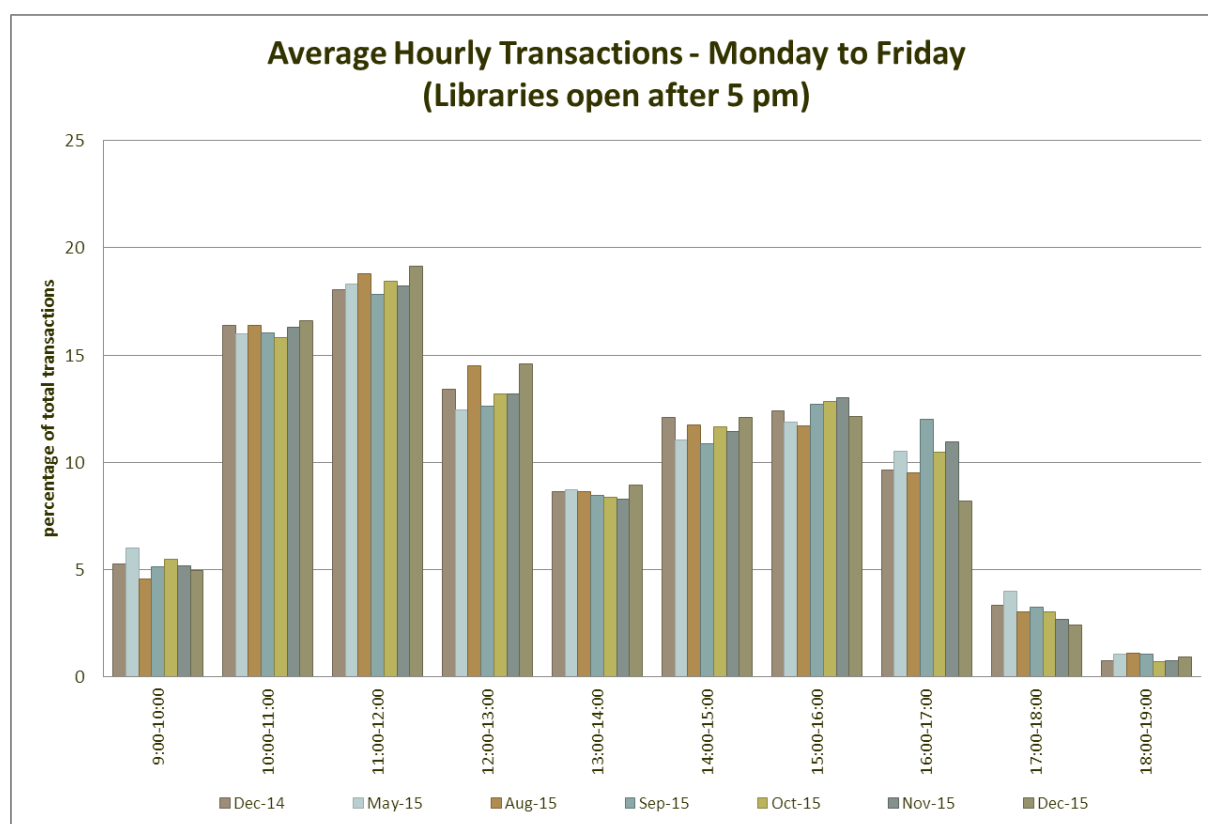
Additional analysis of evening library usage

Because not all of our libraries open after 5.00pm, we have undertaken some separate analysis of the patterns of hourly library usage in 15 of the 16 libraries that open after 5.00pm, to compare them with patterns of usage in all libraries. We have not included data from Pevensy Bay as it has been closed for a long period of time due to flood damage. The aim of this was to see if people use libraries that open later differently, e.g. is there more use later in the day in these libraries, and therefore whether we would need to understand the impact of any differences in developing the proposals.

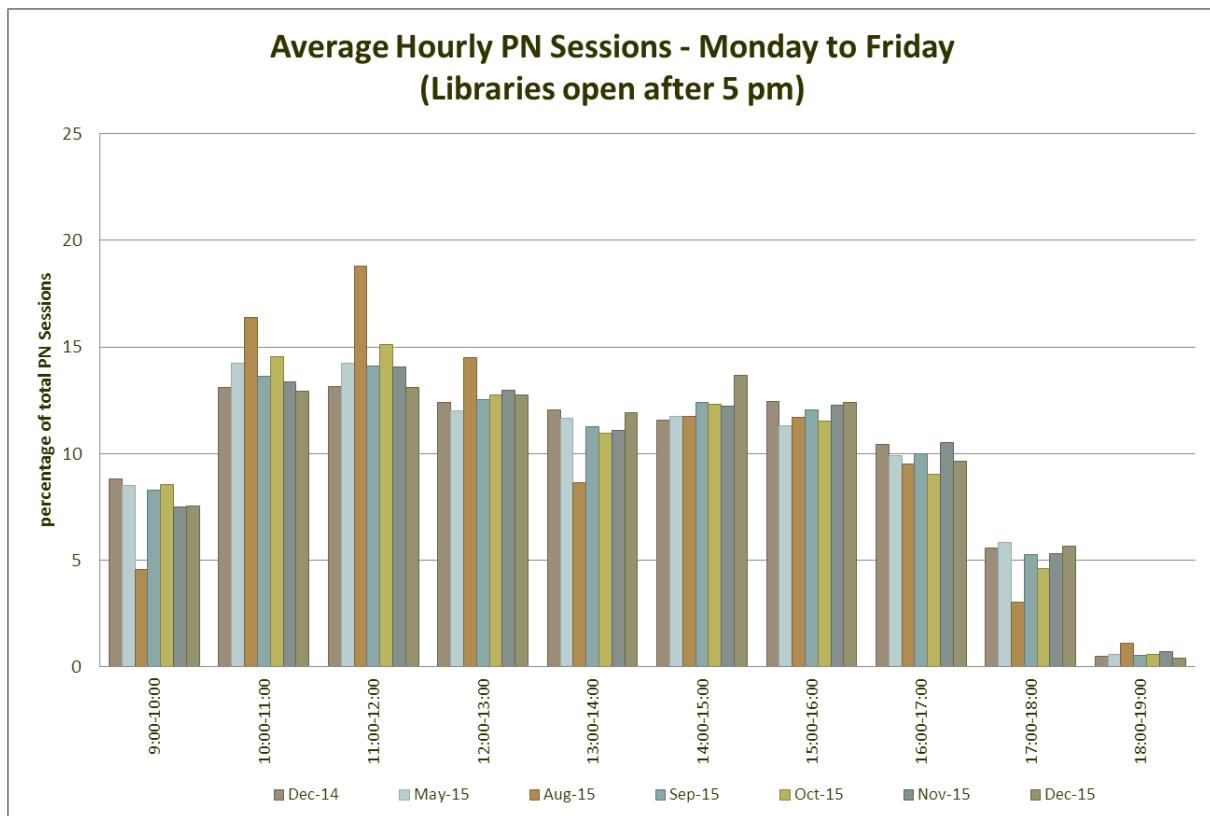
Three libraries are currently open until 5.30pm on at least one evening per week (Hollington, Polegate, Rye) and a further 12 libraries are open after 5.30pm on at least one evening per week (Battle, Bexhill, Crowborough, Eastbourne, Hailsham, Hastings, Heathfield, Lewes, Mayfield, Peacehaven, Ringmer and Uckfield). This analysis has also focussed on data from December 2014, May 2015 and August to December 2015.

The results of this analysis show that only 4-5% of daily transactions in these libraries are carried out after 5.00pm. Similarly, 6-8% of People's Network computer sessions and 6-8% of WiFi usage were recorded after 5.00pm. The results of this analysis are shown in the following three graphs (Graphs 14, 15 and 16). These graphs also show that there are very similar patterns of hourly library usage throughout the day in libraries that have evening opening hours compared with usage patterns in all libraries as shown in Graphs 8-13.

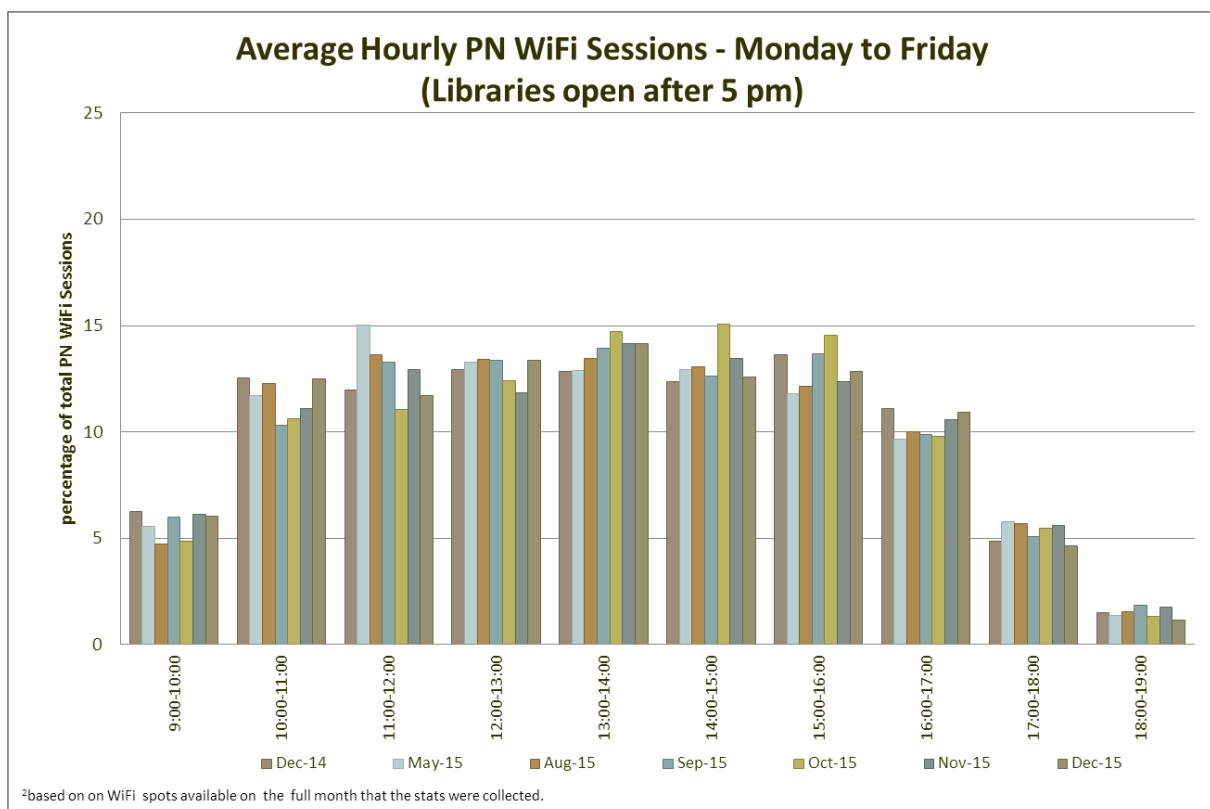
Graph 14: Average hourly weekday transactions in libraries that remain open after 5.00pm



Graph 15: Average hourly PN sessions in libraries that remain open after 5.00pm



Graph 16: Average hourly Wifi usage in libraries that remain open after 5.00pm



Evening visitor count and user survey (March and April 2016)

In order to provide a comprehensive picture of who uses libraries in the evenings and what they are being used for, we commissioned further surveys at the same 15 libraries that have weekday opening beyond 5.00pm.

The surveys were scheduled for completion in the week commencing 14 March 2016 (a term-time week) and the week commencing 4 April 2016 (a school holiday week). This has provided further evidence of the potential impact of proposed changes to library opening hours in the County.

People entering the library between 4.00pm and closing time were recorded as visitors in 30 minute periods on each day that the library opened after 5.00pm. As many as possible of these visitors were then surveyed, to obtain information as to:

- Age range (including children)
- Primary purpose of visit
- Frequency of visit
- Usual timing of visits
- Employment / lifestyle group
- Home Postcode

Additionally, each interviewee was asked to view the current and proposed opening hours, and give their opinion as to whether or not they would still be able to make effective use of the library. The program covered every library *on each day* that it was open after 5.00pm in the selected weeks.

In total, 2,087 evening visitors were counted across all 15 of these libraries between 4pm and closing time across the two weeks. 1,148 users were surveyed across these two weeks, representing just under 55% of the total 2,087 visitors seen. Statistically, given the complete coverage at libraries open after 5.00pm, it is possible to state with 95% certainty that the answers given by those interviewed are within 2% of the answers for library users as a whole.

Tables 2 and 3 show the visitor counts at the individual libraries and the totals in each half hour period across all 15 surveyed libraries. There was little difference in patterns of usage throughout the evening period between the two weeks, the only noticeable difference being that there were more visitors to libraries between 4.30pm and 5.00pm during the second week (the school holidays) than there were in the March week. It should be noted that Eastbourne library was closed on Friday 8 April due to a leak. Had the library been open and a survey undertaken, the overall visitor numbers for the second week would have increased slightly.

71% of those surveyed visited at least once a fortnight, which gives us confidence that the customers spoken to were representative of regular users of the library. 67% of all visitors were seen prior to 5.00pm and 84% before 5.30pm, but clearly this is in part because several of the libraries do not open beyond this time. In cases where the library was open through to 6.30pm or 7.00pm:

- 61.3% of visitors were seen in the first hour
- 31.5% were seen in the second hour
- 7.2% were seen in the final hour.

It can be seen that the number of visitors decreases significantly during the course of the period from 4.00pm to 7.00pm. Apart from Eastbourne and Bexhill libraries, visitor numbers after 5.00pm were in single figures each day over the full two week period and in some libraries on some days no-one visited at all after 5.30pm. Across all 15 of these libraries between 6.00pm and 6.30pm there were 44 additional visitors in total in week one and 50 visitors in week two. From 6.30pm there were nine additional visitors in total in the 15 libraries in week one and seven in week two.

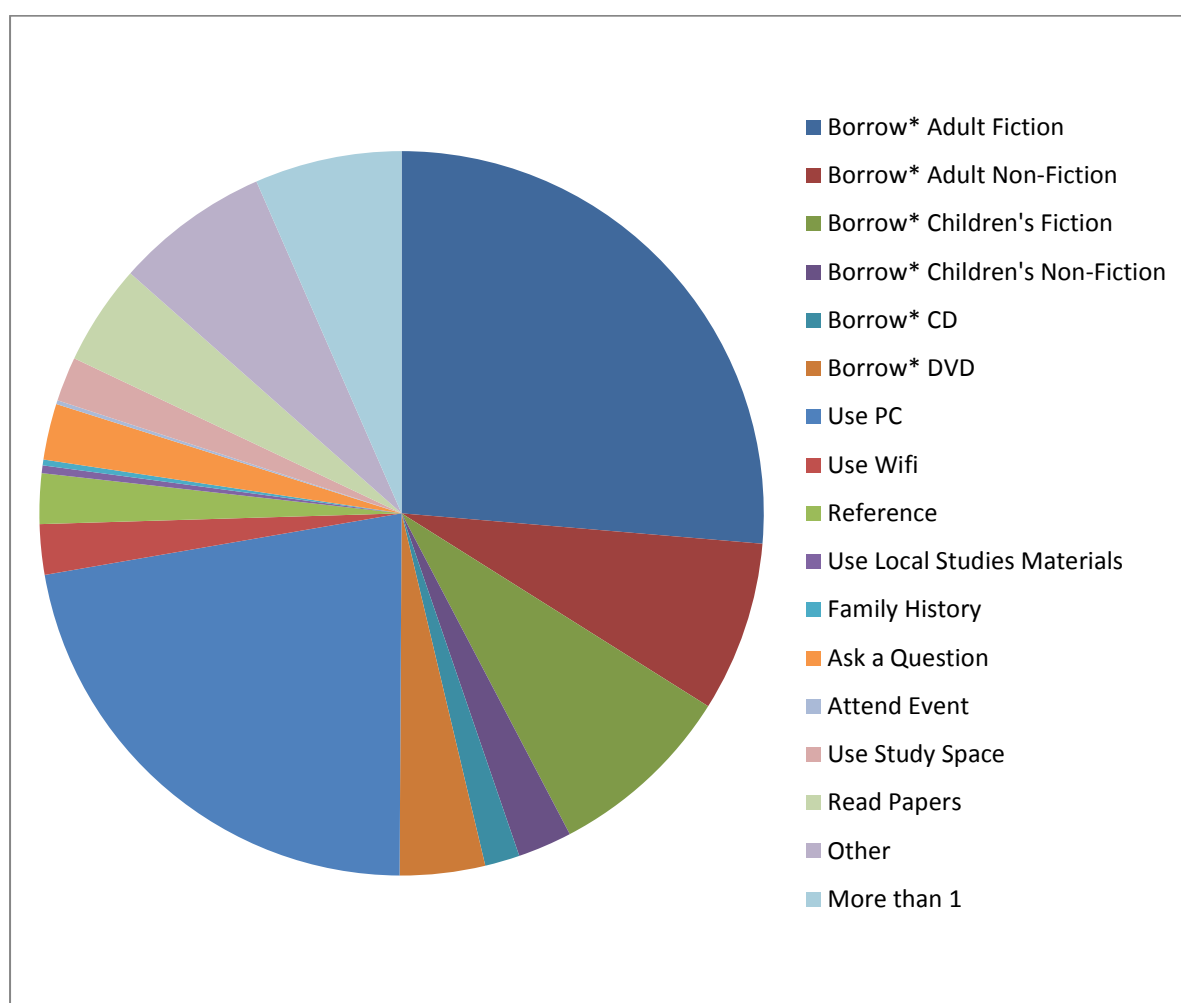
Table 2 Evening visitors count - March 2016

Date	Library	1600-1630h	1630-1700h	1700-1730h	1730-1800h	1800-1830h	1830-1900h
14-Mar	Crowborough	8	3	2	Closed	Closed	Closed
14-Mar	Eastbourne	5	12	9	13	5	Closed
14-Mar	Hastings	15	9	5	3	Closed	Closed
14-Mar	Lewes	15	7	7	8	3	2
14-Mar	Rye	9	10	5	Closed	Closed	Closed
14-Mar	Hollington	4	6	0	Closed	Closed	Closed
15-Mar	Battle	11	6	1	2	2	Closed
15-Mar	Bexhill	20	15	21	7	3	Closed
15-Mar	Crowborough	7	3	0	Closed	Closed	Closed
15-Mar	Eastbourne	11	10	8	12	5	Closed
15-Mar	Hailsham	14	4	4	3	1	0
15-Mar	Hastings	5	5	3	3	0	Closed
15-Mar	Hollington	9	1	0	Closed	Closed	Closed
15-Mar	Mayfield	2	0	2	0	Closed	Closed
15-Mar	Polegate	3	5	0	Closed	Closed	Closed
15-Mar	Ringmer	3	2	4	4	Closed	Closed
15-Mar	Rye	13	13	5	Closed	Closed	Closed
15-Mar	Uckfield	4	7	2	Closed	Closed	Closed
16-Mar	Crowborough	6	4	3	Closed	Closed	Closed
16-Mar	Eastbourne	50	15	15	12	4	Closed
16-Mar	Rye	7	5	1	Closed	Closed	Closed
16-Mar	Uckfield	9	3	1	1	2	2
17-Mar	Bexhill	13	8	8	2	0	Closed
17-Mar	Crowborough	3	8	3	0	0	0
17-Mar	Eastbourne	17	26	8	6	2	Closed
17-Mar	Hastings	7	8	6	2	1	Closed
17-Mar	Heathfield	3	4	3	3	1	2
17-Mar	Hollington	16	1	0	Closed	Closed	Closed
17-Mar	Lewes	11	10	5	7	4	1
17-Mar	Mayfield	0	2	2	0	Closed	Closed
17-Mar	Peacehaven	7	4	8	4	3	1
17-Mar	Rye	15	5	3	Closed	Closed	Closed
17-Mar	Uckfield	9	6	0	Closed	Closed	Closed
18-Mar	Battle	5	2	3	3	0	Closed
18-Mar	Bexhill	14	7	11	10	3	Closed
18-Mar	Crowborough	10	7	5	2	1	1
18-Mar	Eastbourne	6	8	12	9	3	Closed
18-Mar	Hailsham	9	4	5	2	Closed	Closed
18-Mar	Hastings	8	9	4	1	1	Closed
18-Mar	Rye	11	5	0	Closed	Closed	Closed
18-Mar	Uckfield	6	2	2	0	0	0
Half hourly totals per week		400	271	186	119	44	9

Table 3 Evening visitor count – April 2016

Date	Library	1600-1630h	1630-1700h	1700-1730h	1730-1800h	1800-1830h	1830-1900h
04-Apr	Crowborough	11	7	3	Closed	Closed	Closed
04-Apr	Eastbourne	24	36	4	14	7	Closed
04-Apr	Hastings	6	10	3	1	Closed	Closed
04-Apr	Lewes	10	9	5	6	9	1
04-Apr	Rye	7	6	5	Closed	Closed	Closed
04-Apr	Hollington	2	1	0	Closed	Closed	Closed
05-Apr	Battle	7	2	0	3	0	Closed
05-Apr	Bexhill	38	14	12	2	1	Closed
05-Apr	Crowborough	8	9	4	Closed	Closed	Closed
05-Apr	Eastbourne	6	9	9	8	6	Closed
05-Apr	Hailsham	9	12	7	0	4	0
05-Apr	Hastings	8	5	4	2	1	Closed
05-Apr	Hollington	5	2	0	Closed	Closed	Closed
05-Apr	Mayfield	2	0	0	0	Closed	Closed
05-Apr	Polegate	2	1	1	Closed	Closed	Closed
05-Apr	Ringmer	4	4	2	1	Closed	Closed
05-Apr	Rye	4	0	3	Closed	Closed	Closed
05-Apr	Uckfield	6	10	4	Closed	Closed	Closed
06-Apr	Crowborough	7	8	4	Closed	Closed	Closed
06-Apr	Eastbourne	6	9	12	10	4	Closed
06-Apr	Rye	10	7	6	Closed	Closed	Closed
06-Apr	Uckfield	13	4	3	0	0	0
07-Apr	Bexhill	9	6	5	0	0	Closed
07-Apr	Crowborough	7	12	2	0	3	2
07-Apr	Eastbourne	54	55	23	23	4	Closed
07-Apr	Hastings	12	10	4	4	1	Closed
07-Apr	Heathfield	6	4	2	4	1	2
07-Apr	Hollington	5	2	2	Closed	Closed	Closed
07-Apr	Lewes	9	12	8	4	6	2
07-Apr	Mayfield	0	8	0	1	Closed	Closed
07-Apr	Peacehaven	9	9	6	5	0	0
07-Apr	Rye	7	6	1	Closed	Closed	Closed
07-Apr	Uckfield	10	10	4	Closed	Closed	Closed
08-Apr	Battle	3	2	3	1	0	Closed
08-Apr	Bexhill	20	18	12	5	1	Closed
08-Apr	Crowborough	7	3	1	4	0	0
08-Apr	Eastbourne						Closed
08-Apr	Hailsham	8	4	2	1	Closed	Closed
08-Apr	Hastings	8	6	3	2	2	Closed
08-Apr	Rye	13	5	3	Closed	Closed	Closed
08-Apr	Uckfield	5	1	3	0	0	0
Half hourly totals per week		387	338	175	101	50	7

Graph 17: Purpose of visits for evening users of libraries that remain open after 5.00pm



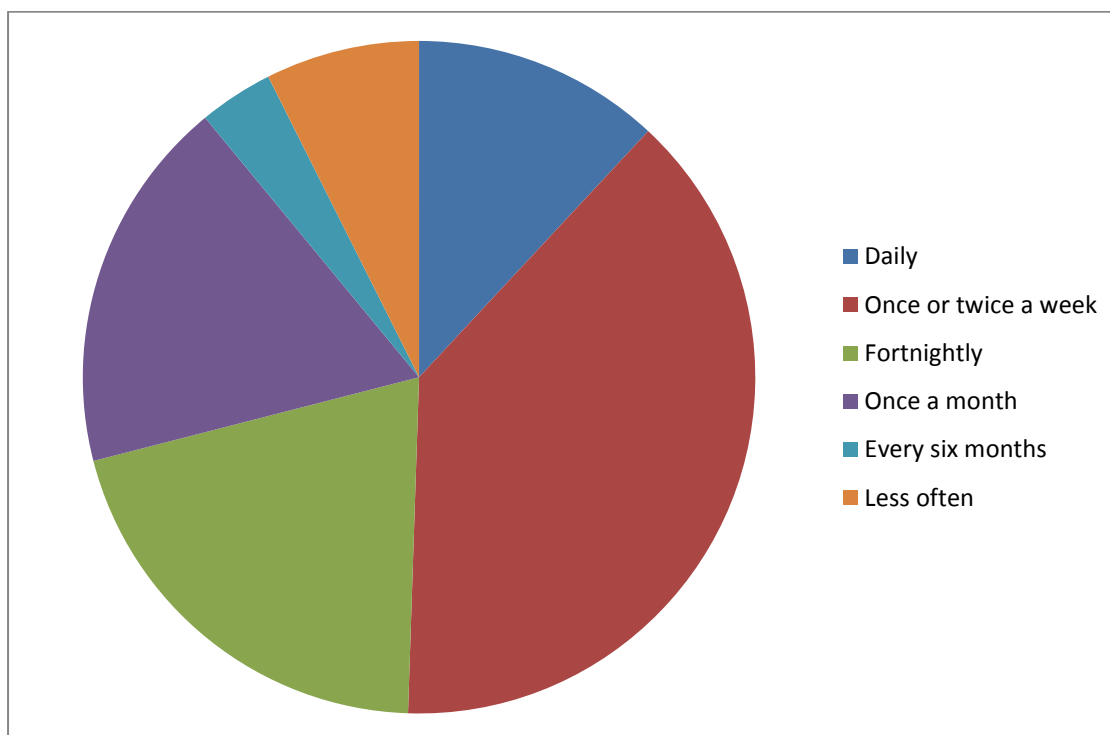
*Borrow includes returning, renewing and reserving items

Graph 17 shows that more than half of evening users were either borrowing adult books or using PC facilities, around 75% in all either borrowing items or using PC or WiFi. Graph 18 shows the frequency with which those surveyed say they visit the library. 71% of those surveyed said they visited at least once a fortnight. However, only 12% of library users said they visited every day. The age groups most represented were age 55-64 and 65-74, who formed 41% of all those interviewed (Graph 19).

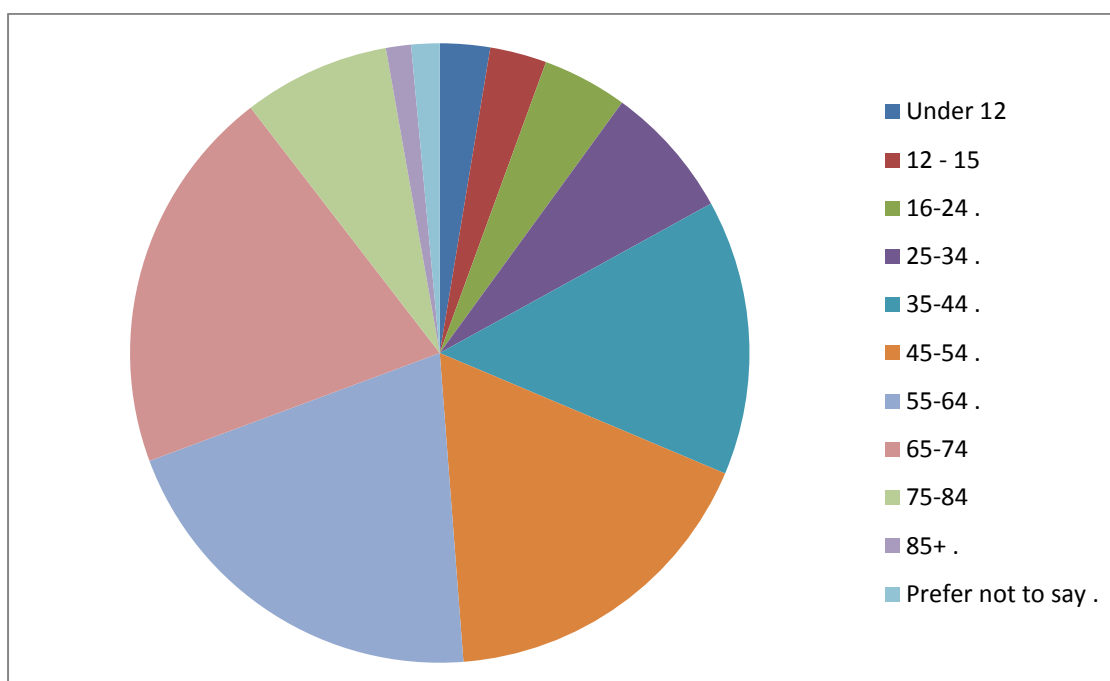
There was very little evidence that the libraries were being used as study spaces, with only 2% of evening users saying this was the main reason for their visit and in all only 5.6% of visitors interviewed were aged under 16, with 10% of those interviewed under 25. 8.5% of evening users were students (Graph 20). This does not suggest that reducing evening opening hours would have a disproportionate impact on young people using the library for homework or as a quiet study space. 61% of evening library users were either retired, unemployed, working part-time or students.

Graph 21 shows that 79% of those we interviewed said they would not be adversely affected (to the point they would be unable to use the library) by the planned changes.

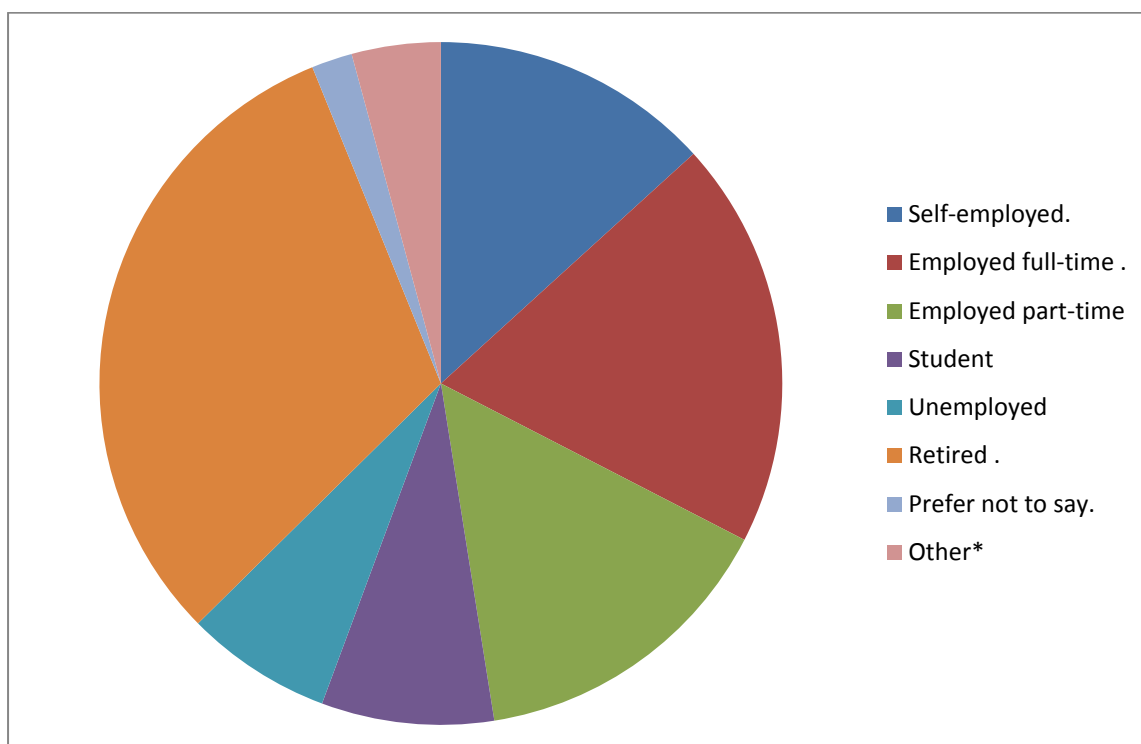
Graph 18: Frequency of library use for evening users of libraries that remain open after 5.00pm



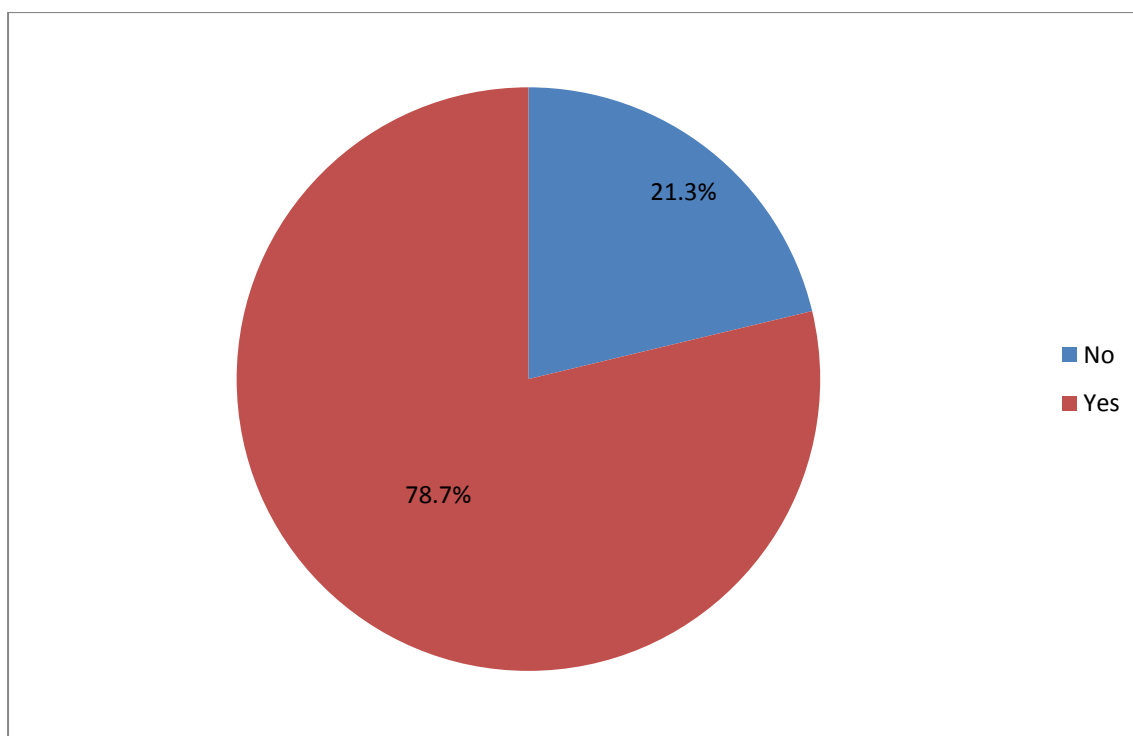
Graph 19: Age profile of evening users of libraries that remain open after 5.00pm



Graph 20: Employment status of evening users of libraries that remain open after 5.00pm



Graph 21: Evening users of libraries that remain open after 5.00pm saying they would still be able to use the library if the proposed changes to opening hours were implemented.



Summary of Equality Impact Assessment of the Proposals

In addition to our statutory duty to provide a comprehensive and efficient library service, the Council must have due regard to its Public Sector Equality Duty when making decisions. The Public Sector Equality Duty (PSED) is set out in Section 149 of the Equality Act 2010. It requires the Council, when exercising its functions, to have “due regard” to the need to:

- Eliminate discrimination, harassment, victimisation and any other conduct that is prohibited under the Act.
- Advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it; and
- Foster good relations between persons who share a relevant protected characteristic and persons who do not share it.

Protected characteristics are defined in the Act as age, disability, gender reassignment, pregnancy and maternity, race (including ethnic or national origins, colour or nationality), religion or belief, sex, and sexual orientation. Marriage and civil partnership are also a protected characteristic for the purposes of the duty to eliminate discrimination. East Sussex County Council also considers carers and part-time workers as additional groups and literacy and numeracy skills and rurality as factors when carrying out analysis.

To comply with the duty, the Council must have “due regard” to the three equality aims set out above. This means the PSED must be considered as a factor to consider alongside other relevant factors such as budgetary, economic and practical factors.

Following the production of a draft Equality Impact Assess (EqIA) to determine the impact of the draft opening hours proposals on equalities, a final EqIA has been produced for the amended proposals which Cabinet Members will have due regard to when they consider whether or not to approve the final proposed library opening hours.

The EqIA has carefully considered the practical impact of the proposed changes to opening hours, taking into account all of the relevant evidence that we have on who uses our libraries, and how and why they are used, so that we can properly understand what the changes would mean to people.

The EqIA finds that we are confident that we have taken reasonable steps to ensure that those groups with protected characteristics have been considered among existing library users. The EqIA identified three main groups to whom this applies: people who work full-time, children and young people who are in full-time education, and people with a disability (especially where they rely on support from another individual or particular services to access the library). Those who work full-time are the most disproportionately affected because of their limited flexibility to use the library during the core hours of 10.00am to 5.00pm on weekdays. However, we know from the results of the consultation and the evening surveys that the level of impact for these groups is small.

There was very little evidence that the libraries were being used as study spaces in the evenings, with only 2% of evening users saying this was the main reason for their visit and in all only 5.6% of visitors interviewed were aged under 16 with 10% of those interviewed under 25. 8.5% of evening users were students. This does not suggest that reducing evening opening hours would have a disproportionate impact on young people using the library for homework or as a quiet study space.

Although late night library opening hours are not well used by the public, we recognise that there are still some customers who cannot easily access the library between 10.00am and 5.00pm. The proposals therefore include mitigation for the impact of reductions in library opening hours by prioritising the Thursday evening opening until 6.00pm. All libraries will open on Saturdays under these proposals, and along with those libraries that are open during lunchtime, they provide opportunities for people in full-time work or education to visit a library. We will still provide 73 hours per week of library opening across the County after 4.00pm on weekdays that will be available to all users including school children and young people and 127.5 hours of library opening on a Saturday.

The existing e-library offers library users the opportunity to access materials such as e-books, e-magazines and audio books online 24 hours a day without the need to visit the library and also to renew loans on items borrowed or place a reservation. Items can also be renewed 24 hours a day by phone using the library helpline.

Computer training and advice is provided in libraries by staff and volunteers who are able to explain to visitors how to access the e-library using the People's Network computers in libraries and using their own devices. Computer advice is available on Saturdays as well as weekdays. This training will continue to be provided.

The Home Library Service delivers books and other materials to people who cannot easily use a library due to disability or frailty. If the proposed changes are implemented, we will promote the new opening hours widely in libraries and across the County to make sure people are aware of and are able to easily remember the changes. As part of the promotion we will actively promote the expanding offer and role of the e-library and other means of accessing the library service at alternative times.

Other options we have considered

This section of the draft impact assessment details the alternatives that have been considered, both in terms of measures that might be proposed instead of reducing library opening hours, and in terms of the different ways that we considered we should implement the proposed reduction in opening hours.

In addition to our duty to provide a comprehensive library service, we also have a duty to provide an efficient service. Our £2million savings plan has considered a range of measures to deliver savings. These include changes to our staffing levels and staffing structures, ways in which we could become more efficient in spending money on library stock, and the potential for savings through a Strategic Commissioning Strategy, which will provide us with a broad, long-term, strategic view of what will or might be required for our library service in the future. We believe that the balance in making savings between these different parts of the library services is right.

We aim to staff the library service in the most efficient way, with operations as cost effective as possible as part of our plans. We need to run libraries safely and efficiently, both for customers and staff. Saving more money on staffing, over and above what we have currently planned as part of the £2m savings is unlikely to be possible. In terms of library stock, we need to ensure that money we spend on books and other material is money well spent. We constantly review our spending on library stock, in line with customer need. We will continue to compare our spending on stock with other similar libraries and with our neighbouring authorities, to ensure that we are being efficient.

The Opening Hours Consultation also asked whether there were alternative proposals, other than reducing opening hours, that could help achieve the necessary savings and invited other general comments or suggestions. A total of 651 comments were received, including

suggestions for cost-cutting and income generation. A summary of the feedback received in response to these open questions is contained in Appendix 2. Some of the suggestions related to activities the LIS is already doing to cut costs or generate income. There were other useful suggestions which will be considered as part of the Libraries Strategic Commissioning Strategy. An analysis of these suggestions and comments is provided in Appendix 2. Unfortunately it is not anticipated that the suggestions put forward would secure the level of savings required even as part of a package of measures.

We have considered whether it would be better to propose closing some of our libraries and keeping the others open for longer. A fundamental part of the development of the Strategic Commissioning Strategy is to undertake a detailed assessment of need for the service as a whole. This will provide us with a broad, long-term, strategic view of what will or might be required for our library service over perhaps the next five to ten years. The Commissioning Strategy is a detailed piece of work that needs to be comprehensive, evidence-based, and not pre-judged. For that reason it will take us around 18 months to complete. Only once this review is complete will we know what the future service could look like and how services should be delivered to best meet need. There are no plans to close libraries during the development of our long term Strategy for the service.

4. Conclusions of the Rationale and Impact Assessment

Over the past five years, use of the e-library and downloading of e-books has grown significantly, whilst the number of people visiting our libraries and the stock that we issue has decreased. This reflects a national trend towards increased use of digital services. Despite these changes, there were still 1.79 million visits to East Sussex libraries in 2015/16, and we have 224,300 library members.

Most visitors to our libraries still use the library for the traditional purpose of borrowing, returning, renewing or reserving a book. Access to library computers and library WiFi is also an important reason for people to visit. Much smaller proportions of users visit the library to borrow CDs and DVDs, to read newspapers and magazines, or to use reference materials.

The results of three library customer surveys in 2015 show that more than two thirds (69%) of people visited our libraries for pleasure, including visits aimed at providing leisure and enjoyment for children. A further 7% visited the library for socialising. Only 10% of visitors were using the library to help with job seeking or in connection with adult education and training.

Almost half of library users were retired people and in total 70% of users were either retired, worked part time, were unemployed, or were students. Only 16% of respondents work full time.

Most people surveyed visited their library at least once a fortnight, with the highest frequency of visits being once or twice a week. Around one fifth of people visited the library once a month. Only 5% of users said they visited the library every day.

With most library users being retired, unemployed or working part time, and the fact that 95% of customers do not use the library every day, most library users are likely to have the flexibility to visit libraries on varying days and at different times throughout the week.

Between 86% and 91% of visits to libraries, use of library computers and WiFi, and loans, renewals and returns of items take place between 10.00am – 5.00pm. The changes we are proposing will enable people to continue to use their library at varied times throughout the week from Monday to Saturday within the core hours of 10.00am to 5.00pm. In addition for those libraries that are currently open later than 5.30pm, people would also be able to continue to use these on Thursday evening each week until 6.00pm, with the exception of Ringmer, where different opening hours are proposed in response to the consultation.

85% of people who responded to the question in our Opening Hours Consultation asking whether they would still have access to a library if the Council implemented the proposed new opening hours said yes and 15% of people said no. We believe this is because most library users are likely to have the flexibility as described above to visit libraries on varying days and at different times throughout the week, as services at all libraries would continue to be accessible at other times of the week.

We also know from the additional surveys we commissioned into who uses the 15 libraries that open during the evening period that the number of visitors decreases significantly during the course of the evening until closing time. Almost 80% of those we interviewed during the evening surveys (from 4.00pm onwards) said they would not be adversely affected (to the point they would be unable to use the library) by the planned changes.

We have considered carefully whether the opening hours proposals would enable us to continue to provide a comprehensive service that is accessible to all our residents by reasonable means. Based on the information above, we are of the view that it would. This

impact assessment concludes that the needs of the public that are met by using the library would still be fulfilled if we implemented the proposals and reduced opening hours by around 25% on average.

There will, of course, be impacts on some residents as a result of the proposals. We have ensured that the groups of people with protected characteristics have been considered among existing library users through the Equalities Impact Assessment (EqIA) that we have undertaken to form part of this impact assessment. The EqIA has enabled us to identify what these impacts are likely to be, how they affect people, and what mitigation we can offer to lessen them. Impacts occur where groups of people have less flexibility than others over when they are able to visit libraries. The EqIA identified three main groups to whom this applies: people who work full-time, children and young people who are in full-time education, and people with a disability (especially where they rely on support from another individual or particular services to access the library). Those who work full-time are the most disproportionately affected because of their limited flexibility to use the library during the core hours of 10.00am to 5.00pm on weekdays. However, we know from the results of the consultation and the evening surveys that the level of impact for these groups is small.

There was very little evidence that the libraries were being used as study spaces in the evenings, with only 2% of evening users saying this was the main reason for their visit and in all only 5.6% of visitors interviewed were aged under 16 with 10% of those interviewed under 25. 8.5% of evening users were students. This does not suggest that reducing evening opening hours would have a disproportionate impact on young people using the library for homework or as a quiet study space.

Although late night library opening hours are not well used by the public, we recognise that there are still some customers who cannot easily access the library between 10.00am and 5.00pm. The proposals therefore include mitigation for the impact of reductions in library opening hours by prioritising the Thursday evening opening until 6.00pm as described above. Following consultation on the draft opening hours proposals it is now proposed that Ringmer library, our only library without any current Saturday provision, would open on a Saturday. All libraries will therefore open on Saturdays under these proposals, and along with those libraries that are open during lunchtime, they provide opportunities for people in full-time work or education to visit a library. We will still provide 73 hours per week of library opening across the County after 4.00pm on weekdays that will be available to all users including school children and young people and 127.5 hours of library opening on a Saturday.

It is also important to remember that the LIS is a service that extends far beyond library buildings. The existing e-library offers library users the opportunity to access materials such as e-books, e-magazines and audio books online 24 hours a day without the need to visit the library and also to renew loans on items borrowed or place a reservation. Items can also be renewed 24 hours a day by phone using the library helpline.

Computer training and advice is provided in libraries by staff and volunteers who are able to explain to visitors how to access the e-library using the People's Network computers in libraries and using their own devices. Computer advice is available on Saturdays as well as weekdays. This training will continue to be provided.

The Home Library Service delivers books and other materials to people who cannot easily use a library due to disability or frailty. If the proposed changes are implemented, we will promote the new opening hours widely in libraries and across the County to make sure people are aware of and are able to easily remember the changes. As part of the promotion we will actively promote the expanding offer and role of the e-library and other means of accessing the library service at alternative times.

In addition to our duty to provide a comprehensive library service, we also have a duty to provide an efficient service. The changes we are proposing to make enable the County Council to save money by not opening libraries when they are least used, which also means that the impact on customers will be minimised. The proposals have been developed by analysing up-to-date data collected from our data management system on library usage, the results of recent customer surveys, and feedback from public consultation.

We considered what alternatives there are to reducing library opening hours, but have concluded that we cannot make sufficient savings from the other areas of our overall £2m savings plan. We also considered whether it would be better to propose closing some of our libraries and keeping the others open for longer. We are developing a long-term, strategic view of what needs our library service should meet over the next five to ten years via our Strategic Commissioning Strategy. This is a detailed piece of work that needs to be comprehensive, evidence-based, and not pre-judged. For that reason it will take us around 18 months to complete. Only once this review is complete will we know what the future service could look like and how services should be delivered to best meet need. There are no plans to close libraries during the development of our long term Strategy for the service.

In conclusion, we believe that the proposals we are putting forward to reduce library opening hours as set out in this report will have a minimal impact on library users, and where there is an impact, we have set out clearly how people can access the alternative library services that are available to them. The proposals will enable us to continue to deliver a comprehensive library service. We believe that the proposals are proportionate and fair, both in the contribution that they will make to the overall savings the County Council needs to make, and in the way that we propose to reduce opening hours at each library across the County. We think the proposals will enable us to continue to provide an efficient library service, and to make it more efficient following their implementation, because we will still be able to deliver all services within the new opening hours.

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Cabinet 19 July 2016

Appendix 5

Equality impact assessment – summary report for proposed reduction to East Sussex library opening hours

The results of equality impact assessments must be published. Please complete this summary, which will be used to publish the results of your impact assessment on the County Council's website.

Members and officers are required to have due regard to the duties set out in Section 149 of the Equality Act 2010 when making decisions and must therefore read and take into account the findings of equality impact assessments in determining the impact of a proposal on equalities.

Date of assessment : July 2016

Manager(s) name: Matthew Wragg **Role:** Project Manager – Strategic Commissioning

Proposal, project, service, strategy or policy, that was impact assessed:

Proposed reduction to East Sussex library opening hours.

An overall 25% reduction of library opening hours is proposed to achieve savings of £500k toward total Library Transformation Programme savings of £2million. Rather than implement a uniform reduction of 25% for every library it was recognised that this would have a disproportionate impact on smaller libraries in particular and for their users. Therefore, the proposals are individual to each library, with a reduction of between 8% and 27% depending on their current opening hours.

Summary of findings:

The EqIA has been developed alongside the opening hours proposals from the outset in order to carefully consider their practical impact on users. We have taken into account all of the relevant evidence that we have on who uses our libraries, how they are used and why, so that we can properly understand what the changes would mean to people.

The general approach has been to develop proposals which reduce library hours at quieter times to reduce the overall impact. We were mindful that the impact therefore is potentially greater for a minority of people who use libraries very early or later in the day. The proposals aimed to mitigate this by protecting some later provision and Saturday provision, while achieving the overall reduction in hours.

A draft EqIA carried out for the draft proposals in 2015 identified three main groups who it was considered might be more affected by the proposals, as follows:

- Working age people who work full-time;
- children and young people, particular those who are in full-time education;
- people with a disability, particularly those who rely on support from a helper or a lift to access libraries

These groups were primarily identified for a common reason, that they are likely to have less flexibility over times when they are able to visit libraries than others.

Since forming these early conclusions we have examined evidence of actual impact on these and on other groups by analysing people's responses to the public consultation and undertaking targeted library user insight for the final EqlA. This included a comprehensive evening survey to test the impact of the proposals on school age children and young people and people who are employed full time. The EqlA identifies the following key areas of impact.

Full-time employees / working age people

The main cause of impact for this group was anticipated to be for those people of working age (between the ages of 16 and 64) in full-time employment. They would be restricted in their opportunities to use libraries if evening hours are reduced and if they are unable get to the library at other times in the day. The results of the opening hours consultation show that people who work full-time have the potential to be most affected by the proposals of all employment groups. Analysis of their comments confirms that this is due to an inability to get to the library at other times of the day. Those of working age are also therefore proportionately more likely to be affected than other age groups. However, the evening library user survey shows that only 19% of evening users were employed full time, an increase of only 3% from the daytime surveys. Some evening provision has been maintained in the proposals at certain libraries as well as provision on Saturday at all libraries. The E-library also offers 24 hours access.

Children and young people

The main cause of impact for this group was anticipated to be the ability to access libraries after school for homework and study if hours are reduced. The evening library user survey was conducted during term time and the Easter school holiday to account for variation. There was very little evidence from the survey that libraries were being used as study spaces in the evenings, with only 2% of evening users saying this was the main reason for their visit. Only 5.6% of evening users were under 16 and 10% under 25. 8.5% of evening users were students. The evidence does not, therefore, suggest that the proposals for reduced evening opening hours would have a disproportionate impact on children and young people. Some evening provision has been maintained in the proposals at certain libraries as well as provision on Saturday at all libraries. The E-library also offers 24 hours access.

Disability

The main cause of impact for this group was anticipated to be the reliance by an individual on a helper to access the library, and their availability during the proposed hours. Analysis of the results of the public consultation was undertaken for those people with a disability who said they would be unable to use a library during the proposed hours. 19 of the 46 people in this group made comments. Generally the cause of the impact did not seem directly attributable to specific needs arising from their disability, but concerned their own availability during the proposed hours. Only one of these comments made reference to their reliance on a lift. The specific nature of their disability covered a range of mental health as well as physical health issues. The evidence does not, therefore, suggest that reduced opening hours would have a disproportionate impact according to disability. However, service mitigations are in place for those library users who have a disability, such as the Home Library Service and 24 hour access to the E-library. Page 270

Though the actual evidence of impact for all groups seems relatively low or negligible, we recognise that there are still some users who may not be able to access the library during the proposed hours. The draft proposals were developed to mitigate for the impact of reductions in hours and a focus on core hours of 10.00am to 5.00pm by prioritising Thursday evening opening until 6.00pm at some libraries where there is currently evening provision, even though use in the evenings is relatively low. All libraries are proposed to open on Saturdays and, along with those libraries that are open during lunchtime, provide opportunities for people in full-time work or education to visit a library.

The EqlA concludes that we are confident we have taken reasonable steps to ensure that those groups with protected characteristics have been considered among existing library users. The final opening hours proposals have been amended for 11 out of 24 individual libraries to try to lessen the impact of these groups and for users more widely.

Summary of recommendations and key points of action plan:

The EqlA identifies that, if agreed, the effective communication of the new opening hours and corresponding mitigations would be key to successful implementation of the proposals. The mitigations, both in general terms (such as the e-library and mobile library) and for those with specific needs, such as disability (i.e. the Home Library Service) are already in place within the current service offer and are not affected by the proposals. Mitigations for those with specific needs would be promoted in a targeted way by library staff in front line roles and in coordinating and support roles.

Promotion

The new hours would be clearly publicised in libraries so that customers are aware of them in advance of and following the implementation. Other channels of promotion would include the County Council's website, the e-library, social media, the library e-newsletter to 70,000 registered users, public and community sector partners, as well as press releases to the local media, and a feature in Your County magazine. The availability of the e-library and of personalised help to use it would also be promoted alongside the new opening hours to increase uptake.

E-library

The e-library offers library users the opportunity to access materials such as e-books, e-magazines and audio books online 24 hours a day without the need to visit the library and also to renew loans on items borrowed or place a reservation. Items can also be renewed 24 hours a day by phone using the library helpline. Computer training and advice is provided in libraries by 'computer buddies' – staff and volunteers who are able to explain to visitors how to access the e-library using the People's Network computers in libraries and using their own devices. Computer advice is available on Saturdays as well as weekdays. This training would be promoted as part of the coordinated plan to mitigate for any impact of the proposals.

Disability

There are a range of current provisions for users with disabilities. Different types of membership are available according to need for those who find it more difficult to manage a standard library account. The Home Library Service is a volunteer provided service which delivers books and other materials for library users who

cannot easily reach a library because they are disabled or frail or because they are caring for someone else who cannot be left. We recognise that adjusting to new hours may present a real challenge for some users and would promote the new opening hours widely in libraries and across the County in different formats to make sure people are aware. We would provide handouts with the new opening hours so that people are able to easily refer to them. We would actively promote the expanding offer and role of the e-library and other means of accessing the library service remotely and at alternative times.

Mobile library

The Mobile Library service provides additional access to the library service for rural communities. It would be promoted as part of the coordinated plan to mitigate for any impact of the proposals. It visits stops across the County every three weeks and is wheelchair accessible.

Monitoring

Once implemented, the impact of the proposals would be monitored on an ongoing basis, using informal and anecdotal evidence by staff as well as more formal review. Service complaints will be kept under review at three monthly intervals for a period of 12 months. Periodic library user surveys would also monitor the suitability of opening hours, for example the Public Library User Survey (PLUS survey) which is carried out every three years. The library service is also undertaking a whole service review to determine the longer term future of the service and will consider suitability of opening hours for current and potential library users as part of that. The resulting Strategic Commissioning Strategy is expected to be produced in July 2017.

Protected characteristics that this project, service, strategy or policy will impact upon

Please mark the appropriate boxes with an 'x'

	Positive	Neutral	Negative
Age			x
Disability		x	
Ethnicity		x	
Gender/Transgender		x	
Marital Statues/Civil partnership		x	
Pregnancy and maternity		x	
Religion/Belief		x	
Sexual Orientation		x	
Other (i.e. carers, rurality): Carers		x	
All		x	

Report to: Cabinet

Date of meeting: 19 July 2016

By: Director of Adult Social Care and Health

Title: Connecting 4 You Programme

Purpose: To seek Cabinet agreement to the proposal to develop a joint East Sussex County Council and High Weald Lewes Havens Clinical Commissioning Group health and social care programme, Connecting 4 You

RECOMMENDATION

The Cabinet is recommended to agree to the development of the proposed Connecting 4 You programme

1 Background

1.1 This report provides an update on the Connecting 4 You programme: a new transformation programme being created in partnership between the High Weald Lewes Havens Clinical Commissioning Group (HWLHCCG) and East Sussex County Council (ESCC). Connecting 4 You is being developed to address the specific population needs and geographical challenges to the delivery and sustainability of NHS and social care services in the High Weald, Lewes and Havens (HWLH) health and social care economy area.

1.2 The national picture for NHS and social care services is very challenging. The key issues are:

- Councils and NHS organisations are facing unprecedented financial challenges.
- People are living longer, and often with complex health conditions. Due to this, demand for NHS and social care services is increasing.
- People are expecting more from their NHS and social care services. They want to be able to choose what services they have, and how they are delivered.
- There are clear Government expectations that health and social care economies will transform and integrate; NHS and social care services will consolidate effort and that there will be a shift towards preventative approaches that support people to live independently in their own homes and communities for as long as they can.

1.3 The health economy area overseen by the HWLHCCG is very complex. It covers an area in the midst of three acute hospital systems, and adjoins four city and county boundaries (Brighton and Hove, West Sussex, Surrey and Kent).

1.4 HWLHCCG and ESCC are developing the Connecting 4 You programme in order to address the specific population needs, geographical challenges and arrangement of services in a way that recognizes the patient flows of the HWLH area.

1.5 HWLHCCG is also part of the broader NHS England Sustainability and Transformation Plan (STP) footprint area, which covers East and West Sussex, Brighton and Hove and East Surrey council areas. The purpose of the STP is to establish clinical and financial sustainability

across its footprint. It is intended that in future health strategy should be developed at the most appropriate geographical scale to meet local needs with provision better co-ordinated to make best use of collective resources and ensure common high standards of quality. A key element of the principles being applied to the Sussex and East Surrey STP is the role placed based leadership and whole systems working will play in delivering sustainable health and social care. It is expected the STP will influence the considerations of HWLHCCG in relation to the Connecting 4 You programme, and vice versa.

2 Financial information.

2.1 In 2015/16, the total annual NHS and adult social care spend in the HWLH area was £257.7m. In addition to this, just under £8.3m was spent in 2015/16 in HWLH on public health services. As noted, councils and NHS organisations are facing unprecedented financial challenges. **Appendix 1** shows the scale of the challenge for the HWLH health and social care economy, with the potential for an increased funding pressure of approximately 25% for the system by 2020/21. The Connecting 4 You programme will develop and implement service transformation that will help to address this challenge.

2.2 The developing programme will support the delivery of the requirements of the NHS Outcomes Framework, the five key domains of which are shown below.

- Preventing people from dying prematurely
- Enhancing quality of life for people with long term conditions
- Helping people to recover from episodes of ill health or from injury
- Ensuring that people have a positive experience of care
- Treating and caring for people in a safe environment and protecting them from avoidable harm

2.3 Delivery of these requirements through the developing programme will support HWLHCCG to meet the challenges of the local implementation of the NHS Five Year Forward View.

2.4 The developing programme will also address the ESCC priority outcomes:

Keeping vulnerable people safe

- All vulnerable people in East Sussex are known to relevant local agencies and services are delivered together to meet their needs
- People feel safe at home
- People feel safe with support services

Helping people help themselves

- Commissioners and providers from all sectors put people first when providing services and information to help them meet their needs
- The most vulnerable adults get the support they need to maintain their independence and this is provided at or close to home
- Individuals and communities are supported and encouraged to be responsible, help others and make the most of community capacity and assets

Making best use of resources

- Applying strategic commissioning to ensure that resources are directed to meet local need
- Working in partnership to ensure that all publicly available resources are used to deliver maximum benefits to local people
- Ensuring we achieve value for money in the services we commission and provide

3 Supporting information

3.1 The Connecting 4 You programme will be delivered in partnership with Sussex Community Foundation Trust, Sussex Partnership NHS Foundation Trust and Brighton Sussex University Hospitals Trust. The programme will be developed with the full involvement of Healthwatch East Sussex, patients, clients, carers, independent sector and voluntary and community sectors.

3.2 At present, Connecting 4 You is at an early stage of development. The programme will build upon the progress that was achieved through the earlier involvement with the East Sussex Better Together programme, and where applicable this work will inform the focus on the specific needs of the HWLH population.

3.3 Key areas of work in the Connecting 4 You programme will be as follows:

- Develop community and personal resilience to promote health and wellbeing, and to prevent avoidable ill health.
- Coordinate supportive services, technology, equipment and accommodation-based solutions to enable people to live independently in their own homes and communities.
- Appraise the capacity and use of the community NHS and social care bed base
- Align and integrate local health and social care, based on four Communities of Practice: Newhaven and Peacehaven, Lewes, Uckfield and Crowborough areas
- Strengthen responsive joint services that help people to avoid unnecessary hospital admission, hasten discharge, and support people in times of need, e.g. intermediate care, re-ablement, crisis response, night support.)
- Improve the urgent care system, through better use of community approaches and improved community based urgent care capacity and capability

3.4 In addition, the Connecting 4 You programme will encompass the agreed East Sussex approaches to the improvement of Children and Young People services. The programme will also incorporate the development of a Mental Health Strategy for the HWLH population.

3.5 A proposed programme structure highlighting key areas of work and showing linkages with existing activity is attached at **Appendix 2**. A diagram setting the model of care and key work streams is attached at **Appendix 3**. If proposals for establishing the Programme are agreed then a detailed implementation plan will be developed. Public, staff and stakeholder engagement forms part of the programme, including Healthwatch East Sussex. If the programme is agreed it is proposed that a Connecting 4 You Scrutiny Board is established made up of the same Members as the East Sussex Better Together Scrutiny Board, to ensure consistency in the scrutiny process and avoid duplication in reporting.

3.6 It is planned that the implementation phase of the Connecting 4 You programme will commence in September 2016, and that the transformational programme of activity will take place over the next three to five years. Any significant in year changes to existing plans will be dealt with through the Council Plan process and through reporting to the Scrutiny Board. The Connecting 4 You programme for 2017/18 onwards will be dealt with through the Reconciling Policy Performance Resources process. **Appendix 4** details the direct additional costs associated with supporting the Connecting 4 You programme. This does not include the additional capacity required from the Departmental Management Team, Finance, Performance Management and operational managers. These additional demands of moving to two health and social care programmes in East Sussex will be managed within existing resources.

3.7 A report on the Connecting 4 You programme will be presented to the Health and Wellbeing Board and to other public forums in coming months.

4. Conclusion and reasons for recommendations

4.1 Cabinet is asked to agree to the development of the proposed Connecting 4 You programme, as set out in the report.

Keith Hinkley – Director of Adult Social Care and Health, East Sussex County Council

Contact Officer: Hugh Evans

Tel. No. 07792 018789

Email: hugh.evans@eastsussex.gov.uk

LOCAL MEMBERS

This report directly affects Members who represent electoral divisions which fall within the High Weald Lewes Havens Clinical Commissioning Group area.

BACKGROUND DOCUMENTS

None

	2015/16		Cumulative Funding Pressures (HWLH area)			
	Outturn		2017/18	2018/19	2019/20	2020/21
	£'000		£'000	£'000	£'000	£'000
High Weald Lewes Havens (HWLH) area	220,000		10,000	20,000	30,000	40,000
<i>East Sussex County Council</i>						
<i>(HWLH area allocation)</i>						
Adult Social Care	37,715		4,314	10,675	13,096	15,599
Public Health	8,265		0	0	0	0
Children's Services	7,981		724	1,509	1,598	1,704
	53,961		5,038	12,184	14,694	17,303
Total	273,961		15,038	32,184	44,694	57,303

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Connecting 4 You – Programme Structure

Background

- 1.1.1 On Friday 13 May 2016, East Sussex County Council (ESCC) and High Weald Lewes Havens Clinical Commissioning Group (HWLHCCG) held a facilitated away half day session to discuss and plan for the Connecting 4 You programme: the joint health and social care transformation programme between the two organisations and their partners in the High Weald, Lewes and the Havens patch of East Sussex.
- 1.2 The Connecting 4 You programme will be developed in partnership with Sussex Community Foundation Trust and Sussex Partnership NHS Foundation Trust. As the work develops, it will involve other NHS trust partners, including Brighton Sussex University Hospitals, Maidstone and Tunbridge Wells and East Sussex Hospitals. The programme will fully involve Healthwatch East Sussex, patients, clients, carers and partners from the voluntary and independent sectors.
- 1.3 The attendees of the away half day considered the range of priorities and imperatives that their own organisations and the High Weald Lewes Havens (HWLH) health and social care economy need to consider, and then discussed which of these required a partnership approach. The group determined that the priorities that required a joint response were to be included in Connecting 4 You programme.
- 1.4 The Connecting 4 You Programme priorities are:
 - Joint HWLH area mental health strategy
 - Integrated community health and social care teams
 - Joint model for streamlined point of access
 - Joint urgent out-of-hospital care approach and interface with locality work
 - Review children's services, including plans for SEND, services for autism, role of community paediatricians and CAMHS
 - Strategy for nursing and dementia care homes, considering community hospitals and broader estates issues
 - Agreed approach to self-management
 - Planning of workforce and capacity
 - Design of integrated planning and locality planning: with decisions on how to devolve to the local level, wherever possible
- 1.5 In addition, a range of projects and programmes already in place will continue within the Connecting 4 You programme, subject to review when the implications of the Sustainability and Transformation Plan are fully understood. These are:

- Integrated Community Equipment Service
- Joint Community Rehabilitation team (JCR)
- Single Point of Advice (SPoA) for children and families
- Integrated delivery of services for children aged 0-5
- Integrated Night Service (INS)
- Community and personal resilience programme

1.8 The following core principles will underpin the development of the Connecting 4 You Programme:

- Connecting 4 You is based upon the principles of system leadership
- Community services should be:
 - Local
 - Responsive
 - Integrated – seamless and coordinated
 - High quality
 - Easy for the public to understand
- The programme should adopt a positive approach and address barriers to progress
- The partnership should be:
 - Open, respectful, considerate to the pressures and restrictions on others
 - Prepared to consider transformational solutions to current challenges
- Transformational activity should be considered in the context of whole system implications, with the primary goal being whole system financial balance
- Public and stakeholder engagement underpinning the work should be as broad as possible

2. Connecting 4 You Community Programme - model of care

2.1 The diagram attached at **Appendix 3** sets out a model of care which focuses support at the lowest level of intervention and cost required to deliver the agreed outcomes. Instead of the present situation, where activity tends to gravitate towards the higher end of the scale of acuity (emergency services and acute sector services), the new model of care will focus more on the community: a shift of activity, capacity and resource to enable the community to offer the same level of responsiveness and support as people presently seek through Urgent Care systems.

2.2 The diagram illustrates the following requirements.

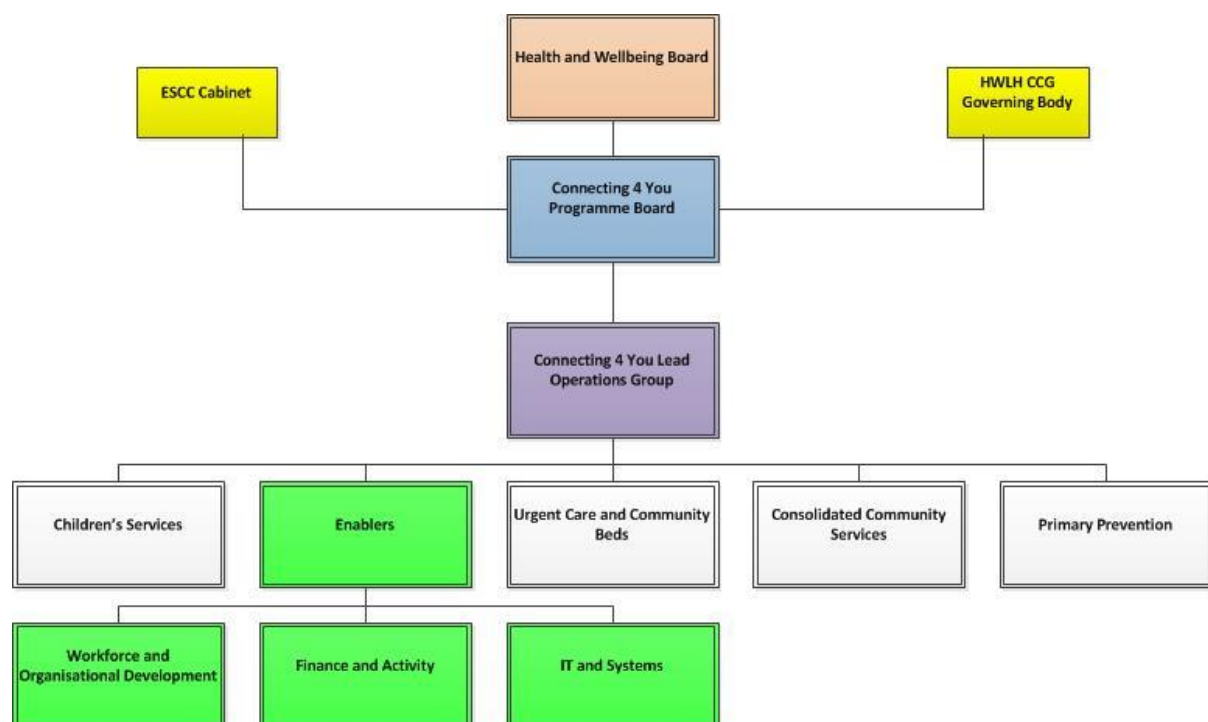
- a. The three primary outcomes that must be achieved in order to create a whole system of community services that best meets the developing needs of the population of HWLH area and delivers sufficient efficiencies to meet the existing and upcoming financial challenges:

- Strong emphasis on primary prevention
- Improved community capacity, and reduced reliance on Urgent Care
- Reliable and efficient emergency services for those who need them

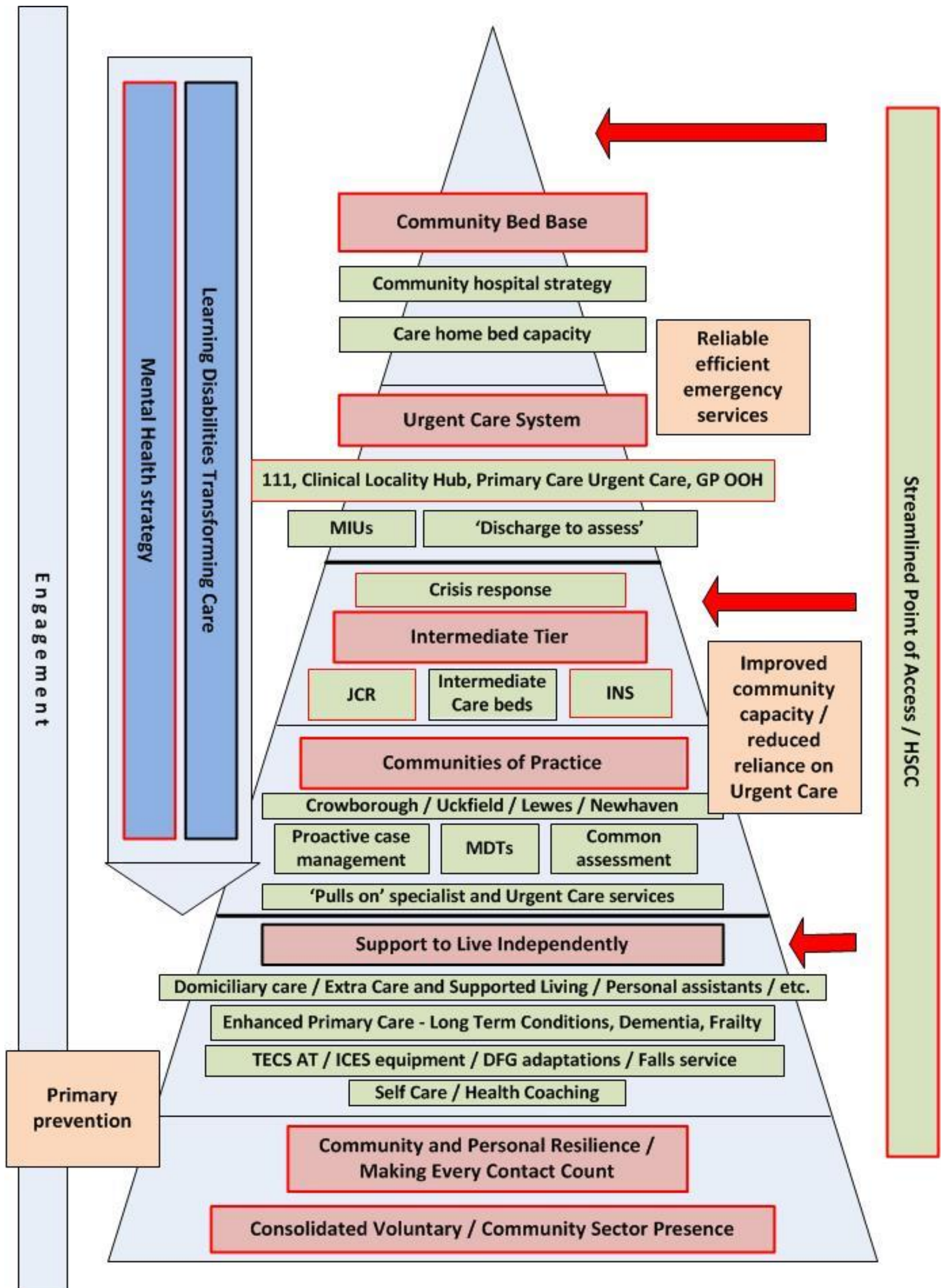
The focus on these outcomes is to address the key requirements of sustainable services and financial balance.

All of the work undertaken through the Connecting 4 You programme will engage fully with all stakeholders.

3. Connecting 4 You Programme Governance Structure:



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Connecting 4 You Community Model of Care

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Appendix 4

Connecting 4 You Programme – direct additional management capacity and costs

Role	Grade	Cost (£) (2016/17)	Cost (£) (2016/17) ESCC @ 50%	Cost (£) (2017/18)	Cost (£) (2017/18) ESCC @ 50%
Interim Programme Management to November 2016	Interim	111,375	55,688	0	0
1x C4You Programme Lead (commencing November 2016)	LMG3	25,213	12,607	60,512	30,256
2x Joint Strategic Commissioners (commencing November 2016)	LMG3	50,427	25,213	121,024	60,512
Total		187,015	93,508	181,536	90,768

- 2016/17 costs based upon commencement of new roles in November, and one third share of existing roles from July
- Additional joint posts will be shared at 50% each

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Report to: **Cabinet**
Date: **19 July 2016**
By: **Chief Executive**
Title of report: **Three Southern Counties (3SC) Devolution Update**
Purpose of report: **To provide an update on the progress of 3SC devolution activity and to confirm the next steps**

RECOMMENDATIONS:

Cabinet is recommended to note the report.

1. Background

1.1 A progress report on the 3SC devolution work was considered by Cabinet at its March 2016 meeting and this was followed by a Members' Devolution Briefing. This report provides an update on the activity that has taken place since this date and on the latest position prior to reporting to Cabinet in July 2016.

2. Position Update

2.1 A seminar was organised in April 2016 for the Leaders of the 3SC Borough, County and District Councils, the Chairman of the East Sussex Fire Authority, the Chairmen of the Local Enterprise Partnerships and the Chair of the South Downs National Park Authority to provide an update on the progress of the devolution proposals and to support the development of a shared understanding of the next steps. The event was successful in bringing together the key partners and in providing them with an opportunity to engage in the work and to share their views about the proposals. The seminar provided the momentum to develop further the discussions with Government and a follow up Leaders' meeting is scheduled for 11 July 2016. An oral update of the 11 July meeting will be provided at Cabinet.

2.2 Members and officers from across the partnership have continued to develop further the "asks" and "offers" set out in the 3SC Prospectus which was submitted to Government in September 2015. The initial meeting with Government to commence formal discussions took place in January 2016 with Baroness Williams, Parliamentary Under-Secretary of State for Communities and Local Government. This meeting has been followed by a series of thematic discussions with various Government departments to explore and develop how each of the elements of the Prospectus could form part of a 3SC devolution deal. A recent meeting with officials from the Treasury and the Department for Communities and Local Government confirmed the strengths of the 3SC proposals and Ministerial support for the direction of travel.

2.3 As the discussions progress and the devolution proposals are developed further, the link between the 3SC asks and offers (grouped broadly into six workstreams: fiscal and investment, housing and planning, infrastructure, public service transformation, skills and governance) is becoming stronger and the single, compelling narrative for 3SC devolution is becoming more persuasive. An overview of the 3SC devolution proposals is set out in Appendix 1.

2.4 Of the overarching 3SC narrative, a new development to note is the proposal, being explored as part of the infrastructure activity, to create a Sub-National Transport Body (SNTB) for the South East. An overview of SNTBs and the proposals for an SNTB for the South East is set out in Appendix 2.

2.5 Discussions with the Department for Transport (DfT) have confirmed the following:

- the 3SC will need to be part of an SNTB if it is to have the influence, as sought as part of the devolution proposals, over infrastructure in the area, in particular determining the priorities of Highways England and Network Rail; and
- the DfT is committed to the creation of a small number of SNTBs across the country and to ensuring that there are no gaps or “white space” not covered by an SNTB within the final map of SNTBs.

2.6 The 3SC Councils have been asked by the DfT to assist in developing the proposals for the SNTB. In addition to being able to influence the governance arrangements that will be put in place, engagement at this stage will ensure the 3SC are part of early stage discussions in relation to the footprint for the SNTB for the South East. There has been an initial suggestion that the areas currently working in partnership as the South East Seven (SE7) would form a strong basis for the geography of the SNTB, however, it is also understood that engagement with the Isle of Wight Council, Portsmouth City Council, Southampton City Council and, potentially, other areas may be requested by the DfT. These discussions are at an early stage and will be developed further over the coming months prior to a formal decision being required. Rupert Clubb, Director of Communities, Economy and Transport, is the officer leading this activity on behalf of the 3SC and SE7 Councils.

2.7 A Communications and Engagement Strategy has been agreed to support the development of the devolution deal to ensure partners, Members, residents and MPs are engaged and updated on progress.

2.8 Activity to consider the governance arrangements required to deliver a devolution deal continues to be planned and will be finalised when the detail of a deal is known.

2.9 The East Sussex Borough and District Councils and representatives from East Sussex Fire and Rescue Service and the South East Local Enterprise Partnership are engaging with and contributing to the development of the 3SC devolution deal.

2.10 The 3SC and Greater Brighton Economic Board are working together and collaborating, where appropriate, to progress the development of the respective deals.

3. Next Steps

3.1 Detailed discussions with Government and relevant partners will continue to deliver the best possible devolution deal for residents, businesses and communities and to determine the timescale for delivering the deal. A meeting with Rt Hon Greg Clark MP, Secretary of State for Communities and Local Government, took place on 7 July 2016 and an oral update will be provided to Cabinet.

3.2 Networks will be accessed to ensure the 3SC can learn any lessons from other areas that are further advanced in their devolution negotiations with Government.

3.3 Any decisions affecting East Sussex County Council will be taken through the established decision making processes.

Becky Shaw, Chief Executive

Contact Officer: Lee Banner, 01273 481857

1. The 3SC (East and West Sussex and Surrey) are pursuing a devolution deal with Government to improve outcomes for local residents and businesses through economic growth, enhanced productivity and a transformation in public service delivery. The 3SC are taking advantage of the Government's commitment to devolving powers and resources to a local level, allowing Authorities to make collective decisions about key services affecting the whole area.
2. The economy of the 3SC has a combined GVA of £74 billion, bigger than Wales and Greater Manchester, making a significant contribution to the national exchequer. However, the area's future economic performance, and the quality of life of local residents, is at risk because of creaking infrastructure and the challenges that businesses face in recruiting and retaining staff.
3. The devolution proposition comprises 6 workstreams: infrastructure; housing and planning; skills; public service transformation; fiscal devolution; and governance.
4. The 3SC are seeking a devolution deal with Government to enable growth of the area's contribution to the national economy by:
 - Agreeing a long-term infrastructure strategy to improve capacity on the rail and road networks and develop the digital infrastructure;
 - Action to accelerate housebuilding and improve the range of housing available;
 - Greater engagement with business, education and others to ensure employers have access to the skills they need and address barriers to employment for people with lower skills; and
 - Public service transformation to meet the needs of residents at less cost.
5. Government has an important part to play in enabling the area to maintain and grow its contribution to the national economy through a devolution deal. The 3SC seek:
 - The pooling of relevant national funding streams locally;
 - An ability for the area to share the financial benefits of growth including retaining a proportion of stamp duty at least for a limited time period;
 - Active Government support to enable the development of new relationships with key national agencies (including the Department for Work and Pensions, Skills Funding Agency, Homes and Communities Agency, Highways England and Network Rail);
 - Speedier release of public land and licensed exemptions from a number of regulations to enable the proposed delivery vehicles and hit squads to get real traction; and
 - Government involvement in the co-design of public services.
6. To ensure the governance arrangements are fit for purpose, the 3SC commits to:
 - Establishing a mechanism for collective binding decision making across the 3SC; and
 - Creating a clear point of accountability for the local delivery of the devolution deal.
7. The 3SC are confident that this deal will have delivered, in five years' time:
 - At least 34,000 new homes;
 - A firm programme for improving crucial transport corridors;
 - A reduction in hard to fill vacancies and skills gaps; and
 - A proven shift to preventative activity with a consequential reduction in costs.

An Overview of Sub-National Transport Bodies and Proposals for the South East

1. Background to Sub-National Transport Bodies

1.1 The Cities and Local Government Devolution Act makes provision for the establishment and constitution of Sub-National Transport Bodies (SNTBs) for any area in England (outside of Greater London).

1.2 An SNTB has the ability to prepare a Transport Strategy for an area. This Transport Strategy is defined as a document which contains the SNTB's proposals for the promotion and encouragement of safe, sustainable, integrated, efficient and economic transport facilities and services to and from the area of the SNTB.

1.3 The establishment of an SNTB must cover the whole area of at least two relevant authorities. The following bodies are considered a relevant authority for the purposes of the Act:

- A Combined Authority;
- An Independent Transport Authority;
- A County Council;
- A Unitary Authority; and
- The Council of the Isles of Scilly.

1.4 An SNTB, which is a body corporate, will only be established by the Secretary of State if it is considered that:

- Its establishment would facilitate the development and implementation of transport strategies for the area, and
- The objective of economic growth in the area would be furthered by the development and implementation of such strategies.

2. Proposals for a Sub-National Transport Body for the South East

2.1 At the 3SC challenge meeting in January 2016, Baroness Williams, Parliamentary Under Secretary of State at the Department for Communities and Local Government, was clear that the 3SC area was too small to establish its own SNTB. A subsequent meeting with Department for Transport (DfT) officials has confirmed this position.

2.2 The 26 Councils that comprise the 3SC area would be in a strong position in an SNTB as the Economic Plan that would be agreed as part of a devolution deal would become a requirement that the SNTB would assist in delivering.

2.3 It is likely that an SNTB for the South East will be established. Engagement by the Councils at this stage can influence the boundary and governance arrangements that will be put in place.

2.4 The boundary of an SNTB has to cover at least two relevant authorities as outlined in paragraph 1.3 above. The SNTB boundary needs to be large enough to allow the genuine strategic consideration and planning of transport infrastructure within it. Much of the strategic transport infrastructure in the South East may start in one Local Authority area and finish in another.

2.5 Discussions are taking place in relation to the geographic footprint of the SNTB for the South East in accordance with the requirement for scale and the need to have no gaps or “white spaces” not covered by an SNTB across the country. The feasibility of the suggestion to develop the SNTB based on the South East Seven boundary is being explored along with other options as this may be requested by the DfT.

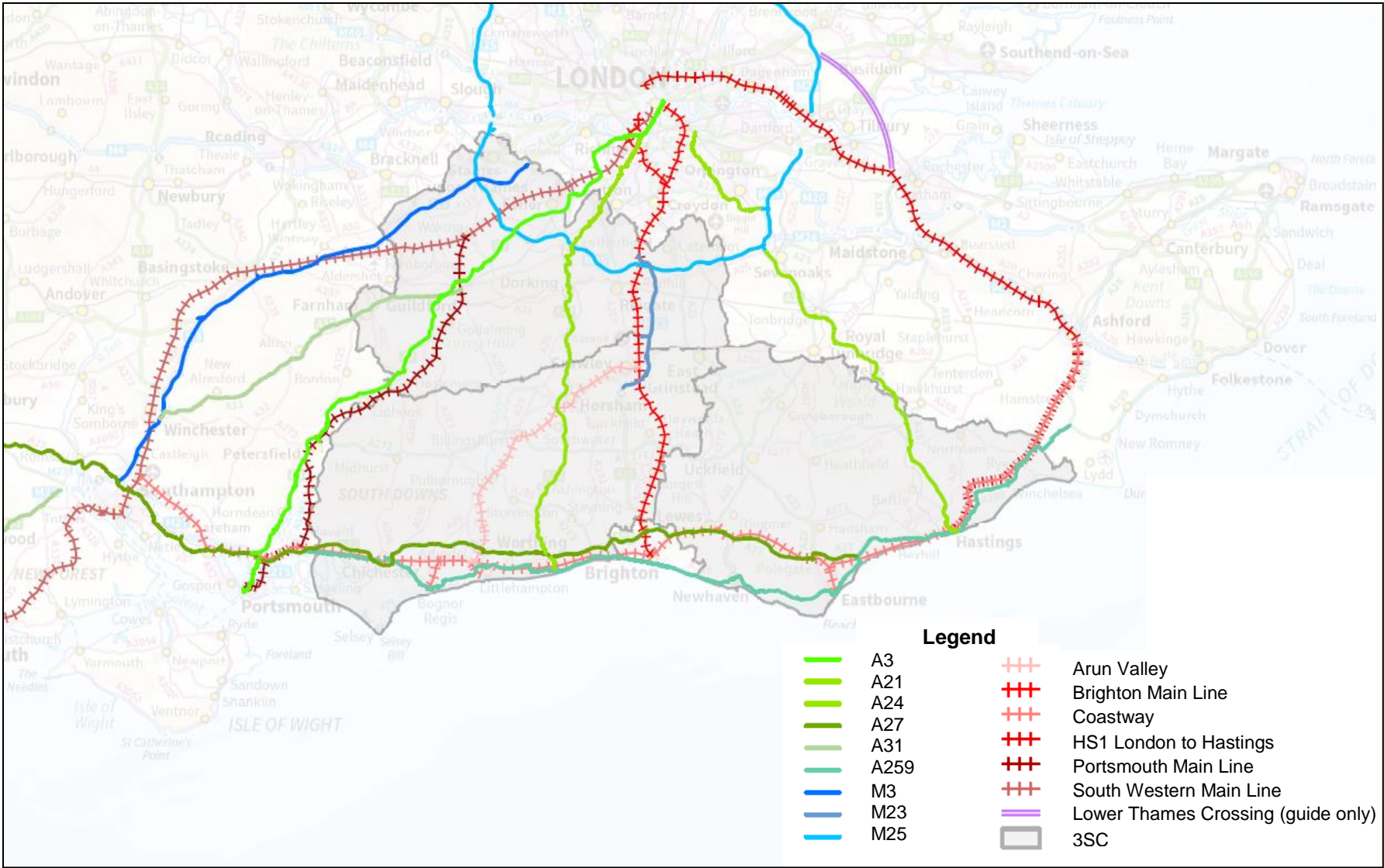
2.6 The rationale for the proposed South East SNTB footprint is that:

- It would have an economic strength similar to Transport for London (TfL) and Transport for the North;
- It would have considerable influence over national and regional infrastructure providers endorsed by Central Government; and
- Significant elements of the infrastructure that 3SC requires to be enhanced to support future growth lies outside the immediate 3SC boundary and, therefore, requires significant joint working with neighbouring Authorities/bodies (ie. TfL, Berkshire, Kent, Hampshire). An indication of some of the strategic infrastructure that the area relies upon is shown in the map attached as Annex 1.

2.7 The definition of infrastructure should include the obvious vital strategic road and rail links but should also include digital connectivity, regional utilities and the South East’s Natural Capital. The broad remit for the SNTB would be to secure, from the appropriate bodies, the infrastructure to support the continued economic development of the area covered by the SNTB and to be the principle interface for infrastructure on regional (including TfL and adjacent SNTBs) and national infrastructure initiatives (High Speed Rail, airports etc). For the 3SC area, the infrastructure needs of the area would be identified by the 3SC Combined Authority.

2.8 The SNTB would be expected to work with the National Infrastructure Commission, the Local Enterprise Partnerships and Government bodies across this wider geography on strategic infrastructure provision including specification, procurement of delivery and identifying and securing funding streams. It would also ensure that the delivery of infrastructure is delivered in a timely manner in support of the 3SC growth agenda.

2.9 Local Transport/Infrastructure Authorities could, in the future, potentially specify, manage and oversee the tendering of bus and rail franchises serving the area if this was a shared ambition in connectivity across the south. This could include an integrated ticketing concession scheme supporting broader integrated transport objectives.



Report to: **Cabinet**
Date: **19 July 2016**
By: **Chief Executive**
Title of report: **South East Seven (SE7)**
Purpose of report: **To provide an update on the progress of the SE7 partnership**

RECOMMENDATION

The Cabinet is recommended to note the progress of the SE7 partnership

1. Position Statement

- 1.1 The last SE7 Leaders' Board meeting of Leaders and Chief Executives took place on Friday 20 May 2016 and the notes of the meeting are attached as Appendix 1. A number of national policy developments were discussed, and the Board considered how the partnership can work together to take advantage of opportunities and meet the challenges emerging as a result of developments.
- 1.2 The Board considered a paper, which outlined the Department for Transport's (DfT) intention, following the introduction of the Cities and Local Government Devolution Act, to establish a small number of Sub-National Transport Bodies (SNTB) across the whole of England (outside of Greater London), with no "white space" between bodies. A SNTB has the ability to prepare a Transport Strategy for an area which contains proposals for the promotion and encouragement of safe, sustainable and efficient transport facilities and services. It was agreed that the SE7 should take advantage of this opportunity to have greater influence over the development and provision of transport and infrastructure in the South East and that leading discussions on the establishment of a South East SNTB would enable SE7 authorities and partners to influence the scope and footprint of the Body. It was also agreed that the SE7 forms a logical footprint for a South East SNTB, but that other additional areas could be considered for inclusion if requested by the DfT and required in order that the Body could deliver its aims. The Board agreed that exploratory work should begin to identify what each SE7 Authority would wish to achieve through an SNTB and to test the appetite of potential partners.
- 1.3 East Sussex County Council's Director of Communities, Economy and Transport is leading on this activity on behalf of the SE7 Councils and the Three Southern Counties (3SC) partnership. There are a number of questions to be resolved with respect to the development of the SNTB, including, how the Body is funded and the relationship with any 3SC devolution deal entered into with Government. These issues will be explored with partners, stakeholders and Government over the coming months.
- 1.4 The Board received a presentation from Hampshire County Council (HCC) on the Educational Excellence Everywhere White Paper and Members discussed a number of concerns regarding Government's current education policy. The slides of the presentation are available upon request. It was agreed that a letter would be sent to the Department for Education, copied to the Treasury, quantifying the investment SE7 Authorities have made in transforming schools, and seeking clarity and further information around how Local Authorities' statutory duty for school improvement will be

impacted by the pursuit of academisation and how the transfer of assets and school budgets will be handled during conversion. It was also agreed that the SE7 should feed into the formation of the Education for all Bill at the Committee Stage to try to ensure these concerns were addressed.

- 1.5 The Board received a further presentation from Brighton & Hove City Council on full business rates retention proposals and the Government's anticipated review and consultation into needs. The slides of the presentation are available upon request. The Board agreed that the question of how need will be measured and met under the new system of full retention was paramount and the SE7 should, therefore, work to demonstrate the level of need in the South East as a priority. It was agreed that the SE7 should commission the production of an independent paper, based on the 2015 SE7 Cost of Success report, demonstrating: the high cost of providing services in the South East; the skills deficit and recruitment difficulties the region currently faces, particularly among public sector workers; and the number of residents living in social deprivation. It was also agreed that the SE7 should engage with the joint Department for Communities and Local Government and Local Government Association Steering Group (which has been established to consider how to implement full retention of business rates), MPs, and local businesses to raise awareness of how full retention will impact Authorities and to address concerns.
- 1.6 Each Authority provided an update on their devolution proposal. Both the Three Southern Counties partnership and Greater Brighton Economic Board continue to work towards key meetings with Ministers to develop their respective deals. HCC has commissioned Deloitte to analyse a number of options for Local Government reorganisation in Hampshire and they have concluded that the creation of a Unitary "Hampshire Council" would increase efficiency and deliver tens of millions of pounds of savings. HCC will, however, undertake a full public consultation before any changes are made. Kent and Medway are engaging with partners and working together to develop a proposal for submission to Government before the Summer Recess.

2. Next Steps

- 2.1 The Chief Executives' Board will progress work on demonstrating need in the South East and consider and plan a potential timescale for delivery of a South East SNTB.
- 2.2 Future meetings of the Chief Executives' Board will also consider the following items in advance of being discussed at future Leaders' Board meetings:
 - Sustainability and Transformation Plans;
 - Health and Social Care Integration; and
 - Future opportunities for collaborative Behavioural Change work.The next Leaders' Board meeting in October 2016 will primarily focus on housing in the South East.

Becky Shaw
Chief Executive

Contact Officer:
Lee Banner
Tel no. 01273 481857



SOUTH EAST SEVEN (SE7) MEETING

Friday 20 May 2016

Attendance

Members

- Cllr. Warren Morgan, Leader, Brighton & Hove City Council
- Cllr. Keith Glazier, Leader, East Sussex County Council (Chairman)
- Cllr. Keith Mans, Deputy Leader, Hampshire County Council
- Cllr. Paul Carter CBE, Leader, Kent County Council
- Cllr. John Simmonds MBE, Deputy Leader, Kent County Council
- Cllr. Alan Jarrett, Leader, Medway Council
- Cllr. Peter Martin, Deputy Leader, Surrey County Council
- Cllr. Louise Goldsmith, Leader, West Sussex County Council

Officers

- Geoff Raw, Chief Executive, Brighton & Hove City Council
- David Kuenssberg, Executive Director Finance and Resourcing, Brighton & Hove City Council
- Kevin Foster, Chief Operating Officer, East Sussex County Council
- David Cockburn, Corporate Director of Strategic and Corporate Services and Head of Paid Services, Kent County Council
- Neil Davies, Chief Executive, Medway Council
- David McNulty, Chief Executive, Surrey County Council
- Sean Ruth, Acting Chief Operating Officer, West Sussex County Council
- Lee Banner, Policy Officer, East Sussex County Council
- Beth McGhee, Policy Development Intern, East Sussex County Council

Apologies

- Cllr. Roy Perry, Leader, Hampshire County Council (Vice-Chairman)
- Cllr. David Hodge, Leader, Surrey County Council
- Becky Shaw, Chief Executive, East Sussex County Council
- John Coughlan, Chief Executive, Hampshire County Council

1.	Introduction, welcome and minutes of last meeting
1.1	Cllr. Glazier welcomed everybody to the meeting and everyone introduced themselves.
1.2	The Board AGREED the minutes of the last meeting of 18 January 2016.
2.	Education White Paper
2.1	<p>Cllr. Keith Mans gave a presentation on the Education Excellence Everywhere White Paper, which covered:</p> <ul style="list-style-type: none"> • the structure of education proposed in the Paper, including the funding and management of Multi-Academy Trusts; • the proposed lines of accountability under blanket academisation; and • the concerns that have been raised by Head-teachers, Local Authorities, parents and other stakeholders since the Paper was published.
2.2	<p>A discussion followed the presentation where Government's decision not to pursue blanket academisation was welcomed, and it was acknowledged that although academy conversion has worked well for certain schools across the South East, other schools are content and flourishing under the responsibility of Local Authorities who hold a wealth of expertise on school management, transformation and investment. All attendees agreed that the form of leadership pursued by each school should be the one that is most beneficial for pupils.</p> <p>A number of concerns were raised around the Government's education policy moving forward and the implications of the Education for All Bill. It was established that, at present, the geography covered by Regional Schools Commissioners (RSC) is too great, making effective partnership working difficult and raising questions around how RSCs would effectively manage school performance. It was acknowledged that the Government is still keen to encourage academisation and concerns were raised about the cost of conversion to Authorities, and how the loss of schools as Local Authority assets will impact capital programmes. Other concerns raised regarded the loss of parental input in schools, how Authorities will uphold their statutory duties for Special Education Needs and Disability provision and safeguarding, and whether academies will provide enough school places, particularly for vulnerable children and young people.</p> <p>In response to the Government's current education policy some Authorities fed back that they are looking to establish a Local Authority Multi-Academy Trust.</p>
2.3	<p>It was AGREED that the SE7 would draft a letter to the Department for Education, copied to the Treasury, quantifying the total amount Authorities across the SE7 have spent on transforming schools and specifically the school property assets, seeking further clarity around how Local Authorities' statutory duty for school improvement will be impacted by the Government's pursuit of academisation, and requesting further information on how the transfer of assets and school budgets, including existing deficits, will be handled when schools convert. John Coughlan is to pick this up when discussed at the next SE7 Chief Executives' Board.</p> <p>It was AGREED that the SE7 should also take opportunities to feed into the formation of the Education for All Bill, including by feeding concerns back to MPs and working with members of the Public Bill Committee.</p> <p>It was AGREED that if Members think of any further points that should be</p>

	addressed in the letter, they should send them to lee.banner@eastsussex.gov.uk .
3.	National Non-Domestic Rates Proposals Implications and Government Review and Consultation Into Needs
3.1	<p>David Kuenssberg gave a presentation on proposals for full National Non-Domestic Rates (NNDR) retention. The presentation outlined:</p> <ul style="list-style-type: none"> • the timeline for developing and implementing 100% retention; • a variety of risks and uncertainties that may result from the proposals; • the impact that a review of the Needs formula will have on retention; and • suggested ways that the SE7 may want to lobby and engage with key decision makers, such as the joint Department of Communities and Local Government (DCLG) and Local Government Association (LGA) Steering Group that has been commissioned to consider: <ul style="list-style-type: none"> ○ mechanisms for 100% business rates retention; ○ time scales; ○ implementation; ○ system design; and ○ how need will interact with redistribution and new service responsibilities.
3.2	<p>A discussion followed in which Members considered the best way to represent the views of the SE7 during NNDR retention discussions. Members identified a number of concerns that would need to be addressed, including, the possibility of Authorities receiving new responsibilities that are underfunded by the new system and the possibility of current disparities in distribution being reflected in the new system. The membership of the DCLG/LGA Steering Group was reviewed and it was agreed that opportunities for the views of county areas to feed into the Group's work would need to be identified.</p>
3.3	<p>It was AGREED that the SE7 should utilise links with Central Government and the joint DCLG/LGA Steering Group to address the concerns. It was AGREED that the SE7 should also engage with MPs to demonstrate the effect that proposals could have on the region.</p> <p>The Board AGREED that the question of how need will be measured and met under the new system was paramount and that the SE7 should work to demonstrate the level of need in the South East as a priority. It was proposed that the SE7's 2015 Cost of Success Report should form the basis of this work, as it clearly demonstrates the high cost of providing services in the South East, with additional figures, demonstrating the skills deficit and recruitment difficulties the region currently faces, particularly among public sector workers, and the number of residents living in social deprivation to be included. The Board suggested that an independent body/organisation is commissioned to carry out this work.</p> <p>Members also AGREED that the SE7 should work to engage the business community to clarify the potential impact of proposals on Local Authorities and the region, and harness and represent their views on 100% retention.</p> <p>The SE7 Chief Executives' Board will take up this work.</p>
4.	Devolution Activity Update
4.1	Authorities provided an update on their devolution plans.

	<ul style="list-style-type: none"> • Greater Brighton Economic Board (GBEB) – GBEB is working towards key meetings with Ministers and will provide an update on meetings once they have taken place. The Board is monitoring the development of Sustainability and Transformation Plans (STPs) closely to consider the impact that they may have on their proposal. • The Three Southern Counties (3SC) – the 3SC hosted a successful Leaders’ Seminar in early April and representatives are now meeting with Government ministers to determine which parts of the proposals are likely to form the final deal. • Hampshire – Cllr. Keith Mans fed back that Hampshire County Council (HCC) has commissioned Deloitte to analyse a number of options for Local Government reorganisation in Hampshire. Deloitte has concluded that the creation of a Unitary “Hampshire Council” to replace HCC and the 11 Borough and District Councils would increase efficiency and deliver tens of millions of pounds of savings. However, before any changes are to be made, HCC will undertake a full public consultation. The proposal for a Unitary Authority follows proposals for the formation of Combined Authorities in the North (the Heart of Hampshire Devolution Bid) and South (the Solent Devolution Bid) of the county, which HCC regard as ineffective reorganisation as the Combined Authority boundaries pay little regard to current Local Enterprise Partnership, NHS, fire service and police boundaries. HCC is happy that the review has started a debate of what is best for people locally, and is optimistic that the creation of a Unitary Authority could involve a number of powers being devolved to Hampshire in the long-term. • Kent and Medway – Kent and Medway are working together to produce a draft paper focusing on growth (with themes covering housing, transport, jobs, and business support etc.) with the aim of submitting a proposal to Government before the Summer Recess.
5.	Sub-National Transport Body
5.1	<p>David McNulty introduced the paper which outlined that the Department for Transport (DfT) have clear intentions to establish a relatively small number of Sub-National Transport Bodies (SNTB) in England, with no “white space” between bodies. It was suggested that the SE7 should consider leading the discussions on the establishment of a South East SNTB in order to influence the scope and footprint of the body.</p> <p>The Board discussed and agreed that the SE7 should take advantage of this opportunity and that the SE7 forms a logical footprint for a South East SNTB. Leaders agreed that additional areas could be considered for inclusion in the SNTB, if requested by the DfT, if their inclusion would be essential for the South East SNTB in delivering its aims.</p>
5.2	<p>It was AGREED that work should begin at pace to determine what Authorities are looking to get out of a South East SNTB, to build proposals for entering into discussion with DfT. The SE7 Chief Executives’ Board will pick up this work.</p>

6.	Behavioural Insights Team – Future Opportunities
6.1	Neil Davies fed back that following the conclusion of the Medway Council Council Tax Debt and Surrey County Council Adult Social Care Charges trials with the Behavioural Insights Team, now seemed an appropriate time to consider another piece of behavioural change work, potentially on digital transformation.
6.2	Members AGREED that the SE7 should consider further work around behavioural change, and that work should begin by identifying organisations that could provide support with this work.
7.	Sharing, Learning and Improvement
7.1	<p>The Board AGREED that the SE7 could benefit from a discussion of STPs at a future meeting. The purpose of such a discussion would be to feed back how STPs are being implemented across the South East, and how Authorities are effectively working with partners in other sectors of the NHS, including Acute Care, to ensure social care provision and prevention initiatives are effective.</p> <p>Geoff Raw fed back that in July 2017 Brighton is hosting the European Social Network Conference at which global specialists will consider examples of best practice in health and social care integration. Geoff suggested that the SE7 could provide a series of workshops to discuss the practical application of STPs in the run up to the conference.</p>
8.	Next Meeting
8.1	The date of the next meeting of the SE7 Leaders' Board is 10.30am - 12.30pm, Friday 7 October 2016, Hilton Gatwick.

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Report to: **Cabinet**

Date: **19 July 2016**

By: **Chief Operating Officer**

Title of report: **Internal Audit Services: Annual Report and Opinion 2015/16**

Purpose of report: **To give an opinion on the County Council's control environment for the year from 1 April 2015 to 31 March 2016**

RECOMMENDATIONS

Cabinet is recommended to note the internal audit service's opinion on the Council's control environment.

1. Background

1.1 The purpose of this report is to give an opinion on the adequacy of East Sussex County Council's control environment as a contribution to the proper, economic, efficient and effective use of resources. The report covers the audit work completed in the year from 1 April 2015 to 31 March 2016 in accordance with the Internal Audit Strategy for 2015/16.

2. Supporting Information

2.1 All local authorities must make proper provision for internal audit in line with the 1972 Local Government Act (S151) and the Accounts and Audit Regulations 2015. The latter states that authorities 'must undertake an effective internal audit to evaluate the effectiveness of its risk management, control and governance processes, taking into account public sector internal auditing standards or guidance'.

2.2 It is a management responsibility to establish and maintain internal control systems and to ensure that resources are properly applied, risks appropriately managed and outcomes achieved.

2.3 No assurance can ever be absolute; however based on the internal audit work completed, the Head of Assurance (as the Council's Head of Internal Audit) can provide reasonable assurance that East Sussex County Council has in place an adequate and effective framework of governance, risk management and internal control for the period 1 April 2015 to 31 March 2016.

2.4 This opinion, and the evidence that underpins it, is further explained in the full Internal Audit Services Annual Report and Opinion which forms Annexe A of this report. The report highlights:

- Key issues for the year, including a summary of all audit opinions provided;
- Progress on implementation of high risk recommendations;
- Key financial systems;
- Schools;
- Anti Fraud and Corruption.

2.5 Section 6 of the annual report sets out details of internal audit performance for the year, including details of compliance against the relevant professional standards.

3. Conclusions and Reasons for Recommendation

3.1 Cabinet is recommended to note the internal audit service's opinion on the Council's control environment.

3.2 This report was presented to Audit, Best Value and Community Services Scrutiny Committee on 15 July 2016. Due to the short timescales involved, Cabinet will be informed of any comments raised by this Committee.

Kevin Foster, Chief Operating Officer

Contact Officers: Russell Banks, Head of Assurance
Tel No. 01273 481447

Background documents:
Strategic Audit Plan 2015-16
Internal Audit Progress Reports 2015/16

**INTERNAL AUDIT SERVICES
ANNUAL REPORT AND OPINION
2015/2016**



1. Internal control and the role of Internal Audit

1.1 All local authorities must make proper provision for internal audit in line with the 1972 Local Government Act (S151) and the Accounts and Audit Regulations 2015. The full role and scope of the Council's Internal Audit Service is set out within our Internal Audit Charter and Terms of Reference.

1.2 It is a management responsibility to establish and maintain internal control systems and to ensure that resources are properly applied, risks appropriately managed and outcomes achieved.

1.3 Internal audit is not the only source of assurance for the Council. There are a range of external audit and inspection agencies, as well as processes for internal management review, which can also provide assurance and these are set out in the Council's Local Code of Corporate Governance and its Annual Governance Statement.

2. Delivery of the Internal Audit Plan

2.1 The County Council's Internal Audit Strategy and Plan is updated each year based on a combination of management's assessment of risk (including that set out within the departmental and strategic risk registers) and our own risk assessment of the Council's major systems and other auditable areas. The process of producing the plan involves extensive consultation with a range of stakeholders, to ensure that their views on risks and current issues, within individual departments and corporately, are identified and considered.

2.2 In accordance with the audit plan for 2015/16, a programme of audits was carried out covering all Council departments and, in accordance with best practice; this programme was reviewed during the year and revised to reflect changes in risk and priority.

2.3 All adjustments to the audit plan were agreed with the relevant departments and reported throughout the year to Corporate Management Team (CMT) and Audit, Best Value and Community Services Scrutiny Committee (ABVCSSC) as part of our quarterly internal audit progress reports.

3. Audit Opinion

3.1 No assurance can ever be absolute; however, based on the internal audit work completed, the Head of Assurance (as the Council's Head of Internal Audit) can provide reasonable assurance¹ that East Sussex County Council has in place an adequate and effective framework of governance, risk management and internal control for the period 1 April 2015 to 31 March 2016. Audit testing has confirmed that the majority of key controls examined are working in practice, with some specific exceptions.

¹ The use of term 'reasonable assurance' reflects that the opinion has been reached based on the work set out in paragraph 4 below and that it is not possible or practicable to audit all activities of the County Council within a single year.

3.2 Where improvements in controls are required, we have agreed appropriate remedial action with management. It should, however, be noted that three instances have been identified during the year where insufficient action has been taken to improve internal controls in areas where we were previously only able to provide 'partial' or 'limited' assurance' opinions. These are commented on in more detail below and will be subject to further review by Internal Audit in due course.

4. Basis of Opinion

4.1 The opinion and the level of assurance given takes into account:

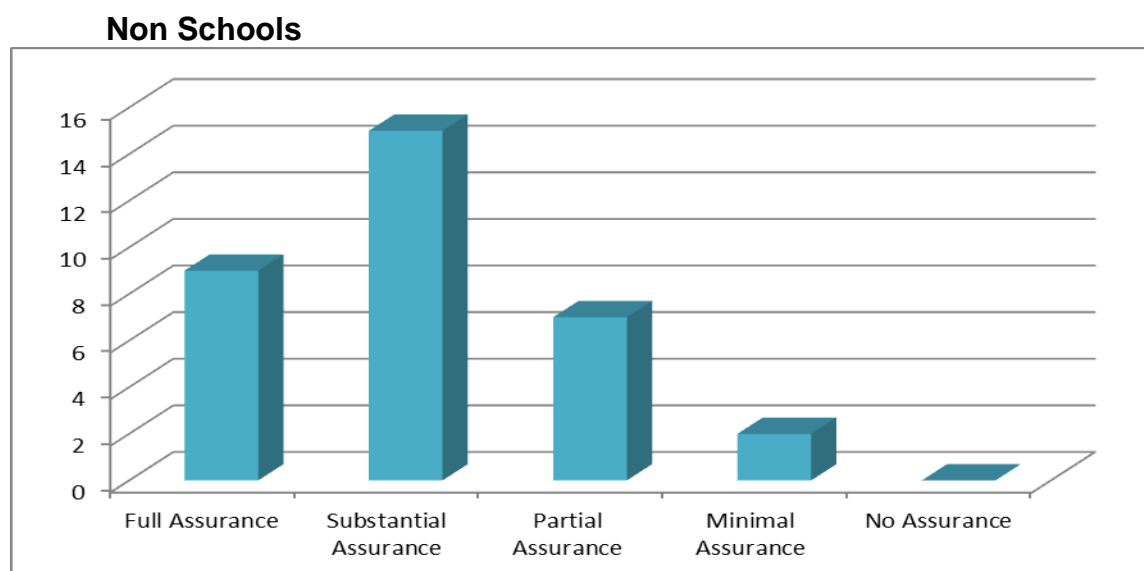
- All audit work completed during 2015/16, planned and unplanned;
- Follow up of actions from previous audits;
- Management's response to the findings and recommendations;
- Ongoing advice and liaison with management, including attendance by the Head of Assurance at monthly Statutory Officers Group meetings;
- Effects of significant changes in the Council's systems;
- The extent of resources available to deliver the audit plan;
- Quality of the internal audit service's performance.

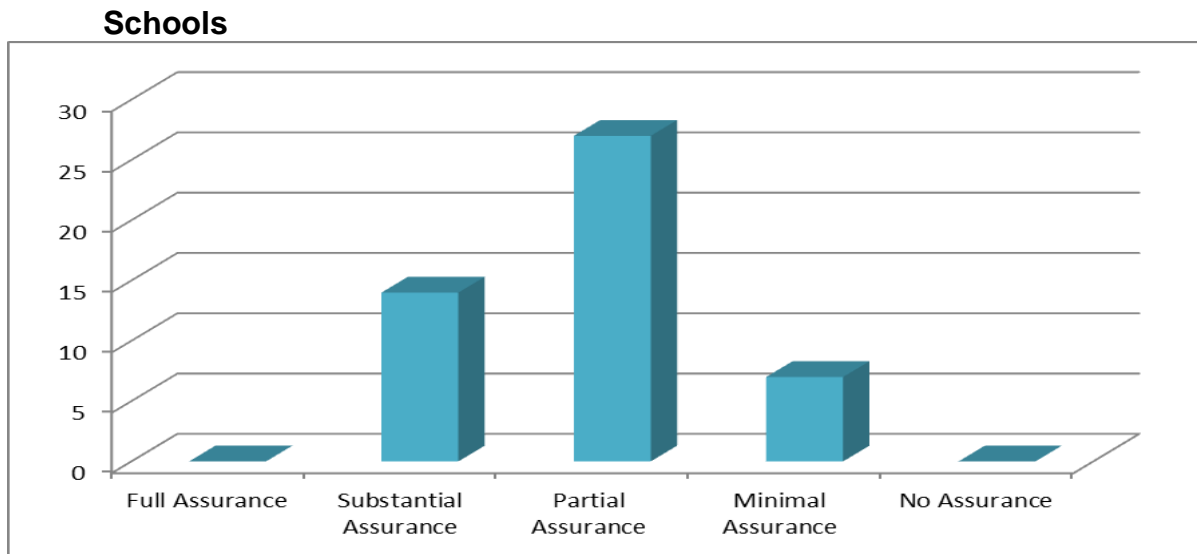
4.2 No limitations have been placed on the scope of Internal Audit during 2015/16.

5. Key Issues for 2015/16

5.1 The overall audit opinion should be read in conjunction with the key issues set out in the following paragraphs. These issues, and the overall opinion, should be taken into account when preparing and approving the Council's Annual Governance Statement.

5.2 The internal audit plan is delivered each year through a combination of formal reviews with standard audit opinions, direct support for projects and new system initiatives, investigations, grant audits and ad hoc advice. The following graphs provide a summary of the outcomes from all non-school audits and school audits finalised during 2015/16 with standard audit opinions:





5.3 A full listing of all completed audits and opinions for the year is included at Appendix B, along with an explanation of each of the assurance levels. Significantly, it is pleasing to report that, with the exception of schools, only two of the audits completed in the period have resulted in 'minimal assurance' and there have been no 'no assurance' opinions.

5.4 Included with the non-schools graph above are a total of six follow up reviews where we have revisited areas which had previously received lower levels of assurance. Whilst for three of these, we have been able to issue a revised opinion of substantial assurance; it is of concern that in the other three audits, insufficient improvement in control has been secured, with partial assurance opinions being given.

5.5 For the three audits concerned, Contract Management, Staff Transfers and Leavers and Schools Senior Leadership Salaries, we have agreed revised action plans with management who have committed to ensuring the necessary control improvements are made. In all cases, this will be followed up once again by Internal Audit during the coming months, with the results being reported to ABVCSSC as part of our 2016/17 quarterly progress reports.

5.6 As well as conducting formal follow up reviews, we have in place arrangements to track the implementation of all high risk audit recommendations issued during the year. As at 31 March 2016, there were two high risk recommendations outstanding beyond the agreed implementation date, both of which related to schools. We are continuing to liaise with school management on these issues and expect them to have been resolved in the near future.

5.7 At the time of producing this report, a total of 8 reviews remained in progress, all of which will be completed during the first quarter of 2016/17. The finalisation of these reports will result in 100% completion of the 2015/16 internal audit plan.

Key Financial Systems

5.8 Given the substantial values involved, each year a significant proportion of our time is spent reviewing the Council's key financial systems, both corporate and departmental. It is pleasing to report that of those completed during 2015/16, all of these, with the exception of Controcc (partial assurance), resulted in either full or substantial assurance being provided over the control environment.

Schools

5.9 Throughout the year, we have completed a programme of assurance work in schools in accordance with our agreed Schools Internal Audit Strategy. For 2015/16, this has focussed on two main areas:

- Audits in a sample of higher risk schools and follow-ups where poorer audit opinions have been given. This work is delivered by our own Internal Audit service, and;
- A wider programme of audits of randomly selected schools, delivered through Mazars Public Sector Internal Audit.

5.10 The purpose of this wider sample of school work is to assess financial governance in more schools, not just those deemed to be higher risk, and to gauge the effectiveness of a new training programme currently being delivered to governors, headteachers and school business managers. A full list of all schools audited in the year, along with the relevant audit opinions, is provided within Appendix B to this report.

5.11 Given that the majority of the randomly selected school audits will be have been completed in advance of the new training programme being concluded, the true effectiveness of the training will not be known until later in 2016/17 when the second sample of school audits is completed. The initial results of our work do, however, indicate that the pattern of poor internal control found in the higher risk group of schools does not appear to be replicated more widely.

5.12 Other audit initiatives during the year to help improve financial governance in schools have included:

- Continuing the work of the Schools Risk Review Group, made up of representatives from Internal Audit, Personnel and Training, Finance, and the Standards and Learning Effectiveness Service (which includes Governor Services), the primary aim of which is to ensure appropriate targeted support and intervention is provided to schools;
- Supporting the development of the more robust training programme for key school based personnel, including business managers, headteachers, chairs of finance committees and chairs of full governing bodies. This training has incorporated the main lessons to be learned from past audit findings;
- Increasing visibility and transparency of audit findings by sending all audit reports directly to individual governors and emphasising the need for these to be subsequently presented and discussed at full governing body meetings;

- Producing quarterly information bulletins for all school governors highlighting common themes and issues arising from audit work which we recommend they seek assurance on within their own schools.

Shared Care Information System (SCIS)

5.13 Throughout 2015/16, Internal Audit have continued to work closely with the SCIS Programme Team to provide assurance over the implementation of a new client information and case management system (Liquidlogic) for Children's and Adult Services. The current social care finance system for Adult Social Care (ASC), Controcc, is being incorporated to provide care and financial information for both Adults and Children in one place. The main areas of focus for our assurance have been:

- Business process re-engineering;
- Data quality and migration;
- Testing arrangements;
- System security and administration, and;
- System interfaces and reconciliation.

5.14 As previously reported, we have provided regular updates during the year which culminated in reports to the Programme Board in November 2015 and February 2016, summarising the work carried out and providing a commentary on any issues which could impact on the Board's decision to go live with Liquidlogic Adults (LAS) and Liquidlogic Children's (LAS) systems.

5.15 Whilst some issues and areas of potential risk were highlighted for management, this enabled the Board to seek assurance from the programme team that these would be resolved prior to any go-live, either through the implementation of formal controls or via temporary workarounds. In the case of both systems, appropriate assurance was obtained from management with the systems now live and in operation across both departments. During 2016/17, we will be undertaking our first full audits of SCIS to ensure the system is operating in a robust control environment.

Cultural Compliance

5.16 Cultural compliance reviews are intended to provide assurance that services are delivered effectively within teams across the Council and in compliance with appropriate policies and procedures. In particular, the reviews focus on service delivery and good management practice, budget management, expenditure, income, staff management and assets and inventory management.

5.17 In 2015/16, we have completed three such reviews, with another due to be finalised soon, covering teams in ASC, CSD, CET and BSD. It is pleasing to report that, for the three reviews completed so far, these have resulted in audit opinions of at least 'substantial assurance', demonstrating the existence of robust management controls in all of the areas sampled. Further similar reviews are planned for 2016/17.

Anti Fraud and Corruption

5.18 During 2015/2016, we logged 30 allegations under the Council's Anti-Fraud and Corruption Strategy, in all cases identified through the Council's confidential reporting hotline or notifications from departments. As a result of the allegations, 10 investigations were undertaken by Internal Audit, with the remainder being referred to local management or assessed as requiring no further action. The following provides a summary of the investigation activity undertaken by internal audit in the last 12 months:

- One investigation into an employee suspected of misusing petty cash and working whilst receiving paid sick leave resulted in the individual resigning during the disciplinary process;
- One investigation into a member of staff suspected of claiming excessive mileage and expenses. Whilst their actions were not deemed to be deliberate, they have been required to repay £1,500 to the Council;
- An investigation into the theft of money from a school. This was found to relate to a previous investigation and subsequent prosecution and was referred back to the police who did not wish to take any further action against the individual;
- One whistleblowing allegation relating to corrupt recruitment processes at a school resulted in a joint investigation and audit of the school. Whilst no evidence of impropriety was found, the successful candidate resigned before taking up the post. A range of recommendations specifically relating to the management of conflict of interests were also made in the audit report which will be followed up during 2016/17;
- One investigation into a potential conflict of interest in relation to the sourcing of training within Children's Services. Whilst procurement processes were not sufficiently robust, no evidence was found that the member of staff in question had personally benefited from the process and no further action was taken as a result;
- An investigation into another allegation relating to misuse of Adult Social Care direct payments was unable to find any evidence to support the allegation and was closed without further action;
- An investigation into an ESCC employee submitting excess mileage claims was undertaken but there was insufficient evidence found to support any further action. However, the investigation highlighted that another employee had submitted duplicated mileage claims which resulted in an agreement for all excess amounts to be repaid;
- One referral relating to the misuse of Adult Social Care direct payments is now an ongoing joint investigation with Wealden DC, encompassing enquiries into direct payment fraud, misuse of grant funded building adaptations and council tax fraud;
- There is an ongoing investigation into an employee submitting excessive mileage claims. The value of the excess claims is estimated to be over £1000.

5.19 Any internal control weaknesses identified during our investigation work are reported to management along with appropriate recommendations for improvement. This work is also used to inform future internal audit activity.

5.20 As part of the Cabinet Office's (previously the Audit Commission's) National Fraud Initiative (NFI), the Council is required provide a range of data in order to carry out a data matching exercise. Data matching involves comparing computer records held by one body against other computer records held by the same or another body for the purpose of identifying potential cases of error or fraud.

5.21 Internal Audit have co-ordinated the production and submission of this data on behalf of the Council, covering a range of areas, including payroll, pensions, creditors, residential care clients, concessionary travel passes, residents parking permits and clients in receipt of direct payments. The results from the exercise were made available in March 2015 for further investigation. Although a small number of matches were still being investigated at the time of writing this report, overpayments totalling £17,492 have so far been identified. These specifically relate to ESCC pensioners who had died but where pension payments continued to be made. In all cases, the pension payments have been ceased whilst our investigations continue, which will include efforts to recover all overpaid sums.

5.22 The latest round of the NFI is due to commence later in 2016/17 with Internal Audit once again co-ordinating the production and submission of data on behalf of the Council.

5.23 As well as the investigation work referred to above, we continue to be proactive in the identification and prevention of potential fraud and corruption activity across the authority and in raising awareness amongst staff. During 2015/16, this has included the delivery of both targeted counter fraud training from teams in specific higher risk areas as well as general awareness sessions available to all staff.

5.24 Whilst it is our opinion that the control environment in relation to fraud and corruption is satisfactory and the incidence of fraud is considered low for an organisation of this size and diversity, we continue to be alert to the risks of fraud. This includes working with local fraud hubs; the aim of which is to deliver a strong and co-ordinated approach to preventing, detecting and responding to the risks of fraud.

6. Internal Audit Performance

6.1 Public Sector Internal Audit Standards (PSIAS) require the internal audit service to be reviewed annually against the Standards, supplemented with a full and independent external assessment at least every five years. The following paragraphs provide a summary of our performance during 2015/16, including the results of our latest internal PSIAS assessment, an update on our Quality Assurance and Improvement Programme and the year end results against our agreed targets.

PSIAS

6.2 The new Standards cover the following aspects of internal audit, all of which have been assessed during 2015/16 by the Head of Assurance:

- Purpose, authority and responsibility;
- Independence and objectivity;
- Proficiency and due professional care;
- Quality assurance and improvement programme;
- Managing the internal audit activity;
- Nature of work;
- Engagement planning;
- Performing the engagement;
- Communicating results;
- Monitoring progress;
- Communicating the acceptance of risks.

6.3 The results of this work found a high level of conformance with the Standards with only a small number of actions identified. The main areas for improvement relate primarily to reviewing and updating our internal quality manual and increasing awareness of the service through the intranet and internet. In all cases, work is continuing to address the required actions, many of which will be considered as part of our ongoing work to develop the Orbis partnership with internal audit colleagues from Surrey County Council and Brighton and Hove City Council.

Key Service Targets

6.4 Performance against our previously agreed service targets is set out in Appendix A. Overall, client satisfaction levels remain high, demonstrated through the results of our post audit questionnaires, discussions with key stakeholders throughout the year and annual consultation meetings with Chief Officers.

6.5 Despite resourcing challenges during the year, 89.1% of the 2015/16 audit plan was completed, just fractionally below our 90% target. A small number of outstanding reviews were nearing completion at year end, with all reports due to be finalised early in quarter 1 of 2016/17. We are currently exploring opportunities to improve the benchmarking arrangements for internal audit and will report on this in due course when further information becomes available.

6.6 Internal Audit is continuing to liaise with the Council's external auditors, KPMG, as part of which both teams are endeavouring to ensure that the Council obtains maximum value from the combined audit resources available.

6.7 In addition to this annual summary, CMT and the ABVCSSC will continue to receive performance information on internal audit throughout the year as part of our quarterly progress reports.

Appendix A

Internal Audit Performance Indicators

Measure	Source of Information	Frequency	Specific Measure / Indicator	RAG Score	Actual Performance Year End
Client Satisfaction					
Chief Officer/DMT	Consultation / Survey	Annual	Confirmation of satisfaction with service quality and coverage and feedback on areas of improvement.	G	Confirmed through Chief Officer consultations in February / March 2016, where high levels of satisfaction confirmed.
Client Managers	Satisfaction Questionnaires	Each Audit	>89%	G	94%
Section 151 Officer	Liaison Meetings	Quarterly	Satisfied with service quality, adequacy of audit resources and audit coverage.	G	Confirmed through ongoing liaison throughout the year and via approval of audit strategy and plan.
ABV&CSSC	Chairs Briefing and Formal Meetings	Quarterly / Annual	Confirmation of satisfaction with service quality and coverage and feedback on areas of improvement.	G	Confirmed through annual review of effectiveness and feedback from committee as part of quarterly reporting.
Cost/Coverage					
CIPFA Benchmarking	Benchmarking Report and Supporting Analysis Tools	Annual	1. Cost per Audit Day; 2. Cost per £m Turnover; equal to or below all authority benchmark average	G	Opportunities to improve benchmarking being explored. Last results available are for 2012, these show: 1. £316 against average of £325 2. £559 against average of £1,004
Local and National Audit Liaison Groups	Feedback and Points of Practice	Quarterly	Identification and application of best practice.	G	Ongoing via attendance at County Chief Auditors Network, Home Counties Audit Group and Sussex Audit Group.
Delivery of the Annual Audit Plan	Audits Completed	Quarterly	90% of Audit Plan Completed.	A	89.1%

Measure	Source of Information	Frequency	Specific Measure / Indicator	RAG Score	Actual Performance Year End
Professional Standards					
Compliance with professional standards	Self-Assessment against new Public Sector Internal Audit Standards	Annual	Completed and implementation of any actions arising.	G	Self-assessment completed, improvement plan in place and being actioned.
External Audit Reliance	Key Financial Systems Internal Audit Activity	Annual	Reliance confirmed.	G	Whilst KPMG no longer seek to directly place reliance on the work of internal audit, as part of their 2015/16 audit plan they reviewed the internal audit function and reports issued. No matters have been raised as a result.

Summary of Opinions for Internal Audit Reports Issued During 2015/16

Full Assurance:

(Explanation of assurance levels provided at the bottom of this document)

Audit Title	Department
High Weald Area of Outstanding Natural Beauty (AONB)	CET
Treasury Management	BSD
New Highways Contract	CET
General Ledger	BSD
Pension Fund Governance and Investments	BSD
Pension Fund External Control Assurance	BSD
Accounts Payable	BSD
Public Health Commissioning	ASC
Cultural Compliance Review - The Family Plus Team / Family Group Conference	CSD

Substantial Assurance:

Audit Title	Department
Accounts Receivable	BSD
Trapeze	CET
Cultural Compliance Review – Joint Community Rehabilitation (JCR)	ASC
Social Care Assessment and Planning Team (Sorrel Drive)	CSD
SAP Security and Administration Follow-Up	BSD
Agile Technology Security Audit	BSD
Coroner's Office Follow-Up Review	G&CS
The Keep	CET
HR/Payroll	BSD
Procurement	BSD
Client Affairs – Follow Up	ASC
SPOCC	ASC
Social Media	BSD
Cultural Compliance Review – The Communications Team	G&CS
East Sussex Better Together - Governance and Pooled Budget Arrangements	ASC

Partial Assurance:

Audit Title	Department
Compliance with ESCC Procurement Standing Orders	BSD
Contract Management Follow-Up	BSD
Controcc and Associated Payment Processes and Procedures	ASC
Special Educational Needs and Disabilities (SEND)	CSD
Troubled Families Programme	CSD
Management of Staff Transfers and Leavers Follow-Up	BSD
Senior Leadership Team Salaries (SLT) Follow Up	CSD

Minimal Assurance:

Audit Title	Department
Public Health Local Service Agreements	ASC
ESCC Microsites	BSD

Other Audit Activity Undertaken During 2015/16 (including direct support for projects and new system initiatives and grant audits):

Audit Title	Department
Social Care Information System (SCIS)	ASC/CSD
E-Invoicing	BSD
Department for Transport Capital Block Funding Claim	CET
Broadband Annual Return	CET
Contracted Car User Status	BSD

Schools

Higher Risk and Follow Up Audits (Delivered in house)	Opinion
St Richard's Catholic College Follow-up	Substantial Assurance
The Bishop Bell CE School Follow-up	Substantial Assurance
Denton Primary School and Nursery Follow-up	Substantial Assurance
Ditchling (St Margarets) CE Primary Follow up	Substantial Assurance
College Central (Pupil Referral Unit)	Partial Assurance
St. Mary's School, Horam	Partial Assurance
Stafford Junior School Follow Up	Partial Assurance
The Causeway Secondary School Follow up	Partial Assurance
Pevensy and Westham CE Primary School	Minimal Assurance
Sacred Heart Catholic Primary School	Minimal Assurance
Castledown Primary School and Nursery	Minimal Assurance
St Marks CE Primary School	Minimal Assurance
Ocklynge Junior School	Minimal Assurance
Randomly Selected Audits (Delivered by Mazars)	
Catsfield CE Primary School	Substantial Assurance
St. Peter and St. Paul CE Primary School	Substantial Assurance
Wadhurst CE Primary School	Substantial Assurance
Brede Primary School	Substantial Assurance
Stonegate CE primary School	Substantial Assurance
St Andrews CE Infant School	Substantial Assurance
Rocks Park Primary School	Substantial Assurance
St Phillip's Catholic Primary School	Substantial Assurance
Bonnors CE Primary School	Substantial Assurance
Laughton Community Primary School	Substantial Assurance
Broad Oak Community Primary School	Partial Assurance
Dallington CE Primary School	Partial Assurance
High Hurstwood CE Primary School	Partial Assurance

Iford and Kingston CE Primary School	Partial Assurance
Manor Primary School	Partial Assurance
Mayfield CE Primary School	Partial Assurance
Rodmell CE Primary School	Partial Assurance
St. Paul's CE Primary School	Partial Assurance
West Rise Junior School	Partial Assurance
Little Common School	Partial Assurance
Roselands Infant School	Partial Assurance
Battle and Langton CE Primary school	Partial Assurance
Guestling Bradshaw CE Primary School	Partial Assurance
St Thomas CE Primary School	Partial Assurance
Tollgate Community Junior School	Partial Assurance
Maynards Green Community School, Horam	Partial Assurance
All Saints CE Primary School, Bexhill	Partial Assurance
Chantry Community Primary School	Partial Assurance
Hamsey Community Primary School	Partial Assurance
St Mary Magdalene Catholic Primary School, Bexhill	Partial Assurance
Little Horsted CE Primary School	Partial Assurance
Nutley CE Primary School	Partial Assurance
Salehurst CE Primary School	Partial Assurance
Parkside Primary School	Minimal Assurance
St Thomas a Beckett Junior School	Minimal Assurance

Internal Audit Assurance Levels:

Full Assurance: There is a sound system of control designed to achieve the system objectives. Compliance with the controls is considered to be good. All major risks have been identified and are managed effectively.

Substantial Assurance: Whilst there is a sound system of control, there are a small number of weaknesses which put some of the system/service objectives at risk and/or there is evidence of non-compliance with some controls. Opportunities to strengthen controls still exist.

Partial Assurance: Controls are in place and to varying degrees are complied with but there are gaps in the control process, which weaken the system. There is therefore a need to introduce additional controls and/or improve compliance with existing controls to reduce the risk to the Authority.

Minimal Assurance: Weaknesses in the system of control and/or the level of compliance are such as to put the system objectives at risk. Controls are considered to be insufficient with the absence of at least one critical or key control. Failure to improve will lead to an increased risk of loss or damage to the Authority.

No Assurance: Control is generally weak or non-existent, leaving the system open to significant error or abuse and high risk to the system or service objectives. A high number of key risks remain unidentified and/or unmanaged.

Report to: **Cabinet**

Date: **19 July 2016**

By: **Chief Operating Officer**

Title of report: **Internal Audit Strategy 2016/17 and Annual Plan**

Purpose of report: **To present the Council's Internal Audit Strategy 2016/17 and Annual Plan**

RECOMMENDATIONS

Cabinet is recommended to review and endorse the Council's Internal Audit Strategy 2016/17 and Annual Plan.

1. Background

1.1 The Council's Internal Audit Strategy 2016/17 and Annual Plan (Annexe A) sets out how the Council will meet its statutory requirements for internal audit, as defined within the Accounts and Audit Regulations 2015. The Strategy proposes an approach based on focussing audit resources in those areas where the highest risk to the achievement of the Council's objectives lies. These areas have been identified and prioritised based on the Council's own risk assessment processes (including the Strategic Risk Register) and following extensive consultation with officers, Members and other stakeholders.

1.2 A workshop was held with Members of the Audit, Best Value and Community Services Scrutiny Committee on 17 March 2015 and comments made have been fed into the planning process.

Supporting Information

2.1 As with the previous year, we have sought to focus our audit and assurance activity on supporting the delivery of the Council's four overarching priority outcomes, namely:

- Driving economic growth;
- Keeping vulnerable people safe;
- Helping people help themselves;
- Making best use of our resources.

2.2 The Strategy and Plan will be delivered in line with proper internal audit practices as set out within Public Sector Internal Audit Standards (PSIAS).

2.3 The Internal Audit Charter sets out the scope and responsibility of internal audit, an updated version of which was approved by the Audit, Best Value and Community Services Scrutiny Committee in June 2014.

3. Conclusions and Reasons for Recommendations

3.1 Cabinet is asked to review and endorse the Internal Audit Strategy 2016/17 and Annual Plan. This was presented to the Audit, Best Value and Community Services Scrutiny Committee on 15 July 2016. Due to the short timescales involved, Cabinet will be informed of any comments raised by this Committee.

Kevin Foster, Chief Operating Officer

Contact Officers: Russell Banks

Tel No. 01273 481447

BACKGROUND DOCUMENTS

Internal Audit Strategy and Annual Audit Plan 2016/17

INTERNAL AUDIT STRATEGY AND ANNUAL AUDIT PLAN 2016-2017

1. Role of Internal Audit

1.1 The full role and scope of the County Council's Internal Audit Service is set out within the Internal Audit Charter and Terms of Reference, which was last approved by the Audit and Best Value Scrutiny Committee (ABVCSSC) in June 2014.

1.2 The following mission statement sets out the basis for the delivery of internal audit services at ESCC:

'Internal audit is an independent assurance function which conducts reviews and provides advice, support and challenge to the organisation on risk, governance and internal control matters. In achieving this, the service aims to:

- *Deliver a high quality, cost effective service in line with best practice and professional standards;*
- *Work constructively with management to support new developments and major change programmes;*
- *Be pragmatic and proportionate with its recommendations, having regard not just to risk, but also the cost of controls;*
- *Be flexible and responsive to the needs of the organisation in all its work.'*

2. Risk Assessment and Audit Planning

2.1 The County Council's Internal Audit Strategy is updated annually and is based on a number of factors, especially management's assessment of risk (including that set out within the departmental and strategic risk registers) and our own risk assessment of the Council's major systems and other auditable areas. This allows us to prioritise those areas to be included within the audit plan on the basis of risk.

2.2 The update of the annual plan for 2016/17 has involved extensive consultation with a range of stakeholders, to ensure that their views on risks and current issues, within individual departments and corporately, are identified and considered. In order to ensure that the most effective use is made of available resources, to avoid duplication and to minimise service disruption, every effort has been made to identify, and where possible, rely upon, other sources of assurance available. The following diagram sets out the various sources of information used to inform our 2016/17 audit planning process:



2.3 In order to ensure audit and assurance activity is properly focussed on supporting the delivery of the Council's Promise, and to reflect its aim to act as a single unified organisation delivering corporate outcomes, the format of the audit plan has been aligned to the four key corporate priorities of:

- Driving economic growth;
- Keeping vulnerable people safe from harm;
- Helping people to help themselves;
- Making best use of our resources.

2.4 In producing the audit plan (which is set out in Appendix A to this report) the following key principles continue to be applied:

- All key financial systems are subject to a cyclical programme of audits covering compliance against key controls;
- Previous reviews which resulted in either 'no assurance' or 'minimal assurance' audit opinions will be subject to a specific follow up review to assess the effective implementation by management of agreed recommendations. This will also include a number of previous reviews with a 'partial assurance' opinion where the area under review is of a higher risk nature.

2.5 In addition, formal action tracking arrangements are in place to monitor the implementation by management of all individual high risk recommendations, with the results of this work reported to CMT and ABVCSSC on a quarterly basis.

2.6 During the past year, the County Council has been working with Surrey County Council, and more recently Brighton and Hove City Council, to develop and form the Orbis Partnership, covering a range of business services, including internal audit. This work is progressing well, with a clear project plan in place aimed at integrating the three internal audit teams into a single service over the next two years. In advance of this, early opportunities to co-ordinate our audit work in areas common to all three local authorities have been identified as part of the audit planning process, particularly where this enables more effective use of the knowledge and skills available across the three internal audit teams.

3. Key Issues

Major Change

3.1 In times of significant transformation, organisations must both manage change effectively and ensure that core controls remain in place. In order to respond to the continued reduction in financial resources and the increased demand for services, the Council needs to consider some radical changes to its service offer in all areas.

3.2 Internal Audit must therefore be in a position to give an opinion and assurance that covers the control environment in relation to both existing systems and these new developments. It is also essential that this work is undertaken in a flexible and supportive manner, in conjunction with management, to ensure that both risks and opportunities are properly considered. During 2016/17, a number of major organisational initiatives are featured within the audit plan, with the intention that Internal Audit is able to provide proactive advice, support and assurance as these programmes progress. These include:

- Better Together;
- Orbis;
- Procurement and Property - improvement and transformation initiatives.

3.3 In recognition that in some cases, sufficient information regarding the full extent of future changes and associated risks may not yet be known, the 2016/17 audit plan once again includes a proportion of time classified as 'Emerging Risks'. This approach has been adopted to enable Internal Audit to react appropriately throughout the year as new risks materialise and to ensure that expertise in governance, risk and internal control can be utilised early in the change process.

3.4 In view of the above, Internal Audit will continue to work closely with CMT and senior management throughout the year to identify any new risks and to agree how and where audit resources can be utilised to best effect.

3.5 Other priority areas identified for inclusion within the audit plan include:

- New Highways Contract;
- Special Educational Needs and Disability;
- Commissioning;
- Direct Payments;
- Contract Management;
- New Liquidlogic Systems – Children's and Adults Social Care;
- Anti-Fraud and Corruption.

3.6 Where common themes and findings are identified as a result of our work across the Council, these will be highlighted in our quarterly and annual reports.

4. Matching Audit Needs to Resources

4.1 The overall aim of the Internal Audit Strategy is to allocate available internal audit resources so as to focus on the highest risk areas and to enable an annual opinion to be given on the adequacy and effectiveness of the Council's framework of governance, risk management and control.

4.2 In addition to this, resources have been allocated to the external bodies for whom we also provide internal audit services at an appropriate charge. These include East Sussex Fire Authority and a number of local academies.

4.3 Internal audit activities will continue to be delivered through a combination of in-house staff and externally provided specialist resources, particularly in areas such as ICT audit. The following table summarises the level of audit resources expected to be available for 2016/17 (expressed in days) compared to the equivalent number of planned days in previous years. The overall level of resource has remained relatively consistent in recent years and is still considered to be sufficient to allow Internal Audit to deliver its risk based plan in accordance with professional ¹standards and to enable the Head of Assurance to provide his annual audit opinion.

¹ Public Sector Internal Audit Standards (PSIAS)

Table 1: Annual Internal Audit Plan – Plan and Actual Days Delivered

	2012/13	2013/14	2014/15	2015/16	2016/17
Plan Days	1,771	1,642	1,580	1,712	1,622
Actual Days	1,830	1,618	1,500	1,581	TBC

5. Audit Approach

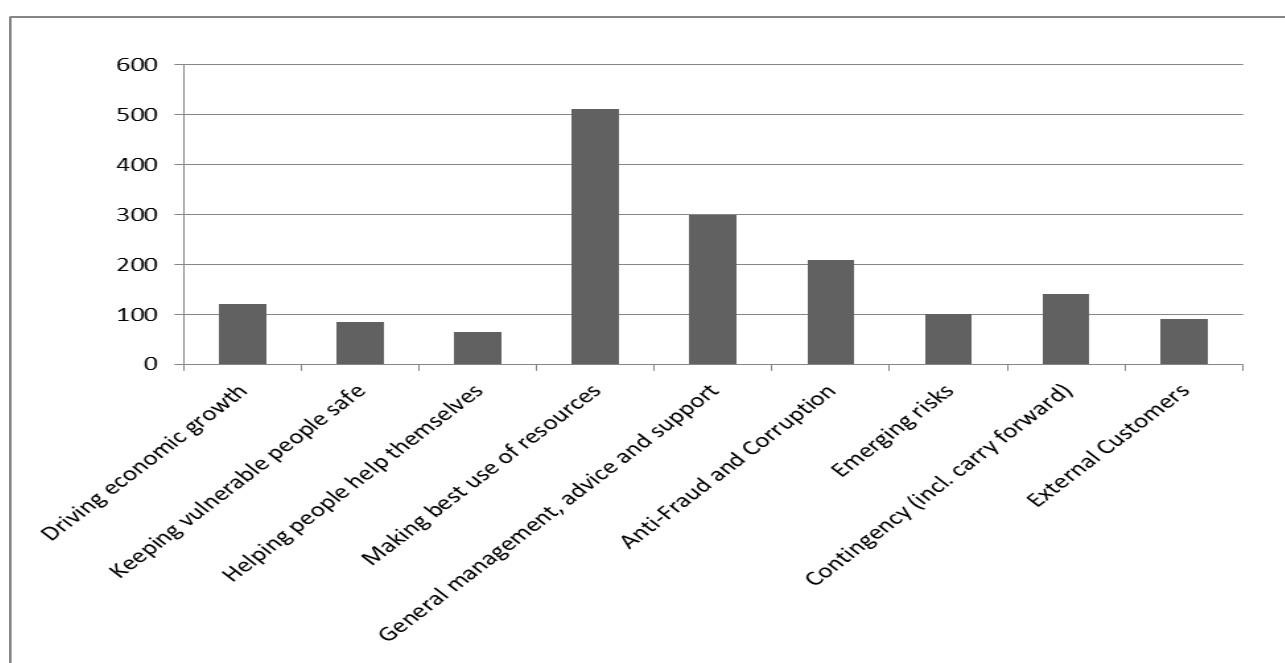
5.1 The approach of Internal Audit is to use risk based reviews, supplemented in some areas by the use of compliance audits and themed reviews. All audits have regard to management's arrangements for:

- Achievement of the organisation's objectives;
- Reliability and integrity of financial and operational information;
- Effectiveness and efficiency of operations and programmes;
- Safeguarding of assets; and
- Compliance with laws, regulations, policies, procedures and contracts.

5.2 In addition to these audits, and the advice on controls given on specific development areas which are separately identified within the plan, there are a number of generic areas where demands upon Internal Audit cannot be planned in advance. For this reason, time is built into the plan to cover the following:

- Contingency – an allowance of days to provide capacity for unplanned work, including special audits and management investigations. This contingency also allows for the completion of work in progress from the 2015/16 plan;
- Advice, Management, Liaison and Planning - an allowance to cover provision of ad hoc advice on risk, audit and control issues, audit planning and annual reporting, ongoing liaison with service management and Members, and audit management time in support of the delivery of all audit work, planned and unplanned.

5.3 A summary of the allocation of audit resources (days) across the 2016/17 audit plan is set out in the following graph:



5.4 In delivering this Strategy, the Head of Assurance has liaised with the Council's external auditors, KPMG, to ensure that the use of audit resources is maximised, duplication of work is avoided, and statutory requirements are met.

6. Training and Development

6.1 The effectiveness of the Internal Audit Service depends significantly on the quality, training and experience of its staff. Training needs of individual staff members are identified through the performance appraisal process and delivered and monitored through on-going management supervision. Use is also made of CIPFA's skills and competencies matrix for internal auditors as part of this process.

6.2 The team is also committed to coaching and mentoring its staff, and to providing opportunities for appropriate professional development. This is reflected in the high proportion of staff holding a professional internal audit or accountancy qualification.

7. Quality and Performance

7.1 With effect from 1 April 2013, all of the relevant internal audit standard setting bodies, including CIPFA, adopted a common set of Public Sector Internal Audit Standards (PSIAS). These are based on the Institute of Internal Auditors International Professional Practices Framework and replace the previous Code of Practice for Internal Audit in Local Government.

7.2 Included within the new Standards is the requirement for the organisation to define the terms 'Board' and 'senior management' in the context of audit activity. This has been set out within the Internal Audit Charter, which confirms the ABVCSSC's role as the Board.

7.3 The PSIAS require each internal audit service to maintain an ongoing quality assurance and improvement programme based on an annual self-assessment against the Standards, supplemented at least every five years by a full independent external assessment. The outcomes from these assessments, including any improvement actions arising, will be reported to CMT and the ABVCSSC each year, usually as part of the annual internal audit report. For clarity, the Standards specify that the following core principles underpin an effective internal audit service:

- Demonstrates integrity;
- Demonstrates competence and due professional care;
- Is objective and free from undue influence (independent);
- Aligns with the strategies, objectives, and risks of the organisation;
- Is appropriately positioned and adequately resourced;
- Demonstrates quality and continuous improvement;
- Communicates effectively;
- Provides risk-based assurance;
- Is insightful, proactive, and future-focused;
- Promotes organisational improvement.

7.4 In addition, the performance of Internal Audit continues to be measured against key service targets focussing on the following three areas, all of which are underpinned by appropriate performance measures:

- Quality/Customer Satisfaction;
- Cost/Coverage;
- Compliance with Professional Standards (as per 7.3 above).

7.5 At a detailed level each audit assignment is monitored and customer feedback sought. There is also ongoing performance appraisal and supervision for all Internal Audit staff during the year to support them in achieving their personal targets.

7.6 In addition to the individual reports to management for each audit assignment, reports on key audit findings and the delivery of the audit plan are made to both CMT and the ABVCSSC on a quarterly basis. An Annual Internal Audit Opinion is also produced each year.

7.7 Whilst Internal Audit liaises closely with other internal audit services through the Sussex Audit Group, the Home Counties Chief Internal Auditors' Group and the County Chief Auditors' Network, we are continuing to develop joint working arrangements with other local authority audit teams (including as part of Orbis) to help improve resilience and make better use of our collective resources. During 2016, the Head of Assurance has taken up the position of Chair of the County Chief Auditor's Network, the membership of which includes all County Council and unitary council heads of internal audit across the England.

7.8 Finally, in order to ensure compliance with professional standards, alternative management arrangements will be put in place to ensure there is appropriate independence where Internal Audit undertakes audit activity in areas where the Head of Assurance (as the Head of Internal Audit for the County Council) also has operational responsibility. This relates primarily to any audit work on risk management or insurance arrangements.

Kevin Foster, Chief Operating Officer

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INTERNAL AUDIT PLAN 2016-2017



Council Priority:	Driving Economic Growth
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Review Name	Type	Outline Objective
External Funding, Grants and Loans	Audit	A review to examine a sample of areas where funding, grants and loans are provided by the Council with a view to ensuring that these are adequately controlled and managed.
Community Infrastructure Levy (CIL) / Section 106 Agreements	Audit	A review to ensure Section 106 and Community Infrastructure Levy contributions are properly identified and collected, and that they are used appropriately.
Highways Contract	Audit	Following the letting of the highways contract to Costain, a review of governance arrangements, performance management, payment mechanisms and new processes will be undertaken.
Schools	Audit	We will continue our audit coverage in schools. This will involve a range of assurance work, including key controls testing in individual schools, follow ups of previous audit work and themed reviews. We will also continue to work with Children's Services colleagues to help improve the level of scrutiny and challenge amongst school governors, including the provision of more robust and focussed training.

INTERNAL AUDIT PLAN 2016-2017



Council Priority: Keeping Vulnerable People Safe

Review Name	Type	Outline Objective
Better Together	Audit	To continue our work in relation to the East Sussex Better Together programme. This will include further work in relation to risk management, a review of information data security and sharing arrangements between organisations, the management of specific schemes within Better Together and preparation for the Accountable Care Model, which will potentially include a review of risk management, procurement and payment mechanisms. We will also provide audit advice and support to the Integrated Planning and Commissioning Cycle work that is currently taking place.
SEND - General	Audit	A previous audit in this area resulted in an opinion of partial assurance. In addition to reviewing implementation of the agreed recommendations, we will also focus further assurance work on partnership arrangements with CCGs (including their governance) and the procurement of agency placements.
SEND – Expenditure in Schools	Audit	A review to ensure SEN funding is used for the purposes intended so that planned outcomes are achieved.
Children’s Safeguarding	Advice and Support	We will work with colleagues within Children’s Services to help identify and map the various areas of assurance in relation to the safeguarding of children.
Trading Standards South East (TSSE) – Governance and Financial Systems	Audit	TSSE is a partnership of 19 local authority Trading Standards services in the South East of England operated by TSSE Ltd. TSSE hold funding, on behalf of all partners, from a variety of sources, including central government. We will review the governance arrangements of the partnership to ensure funding held on behalf of ESCC is used appropriately, in accordance with relevant government guidelines and our own rules and regulations.

INTERNAL AUDIT PLAN 2016-2017



Council Priority:	Helping People Help Themselves
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Review Name	Type	Outline Objective
Commissioning	Audit	A corporate review to provide assurance over the adequacy of commissioning arrangements in relation to a sample of areas across the organisation, focussing on the delivery of required outcomes and value for money, and that commissioned services are subject to appropriate performance monitoring.
Troubled Families	Audit	As a continuation of our work in this area, we will verify a proportion of result claims before they are made, including confirming families' eligibility against the expanded programme and whether progress measures set out in the Troubled Families outcome plans have been achieved and evidenced.
Direct Payments	Audit	Our work will include a follow-up of the audit work undertaken in 2015/16 that resulted in partial assurance. Further work will also be undertaken to examine the system of control associated with the administration, payment and monitoring of direct payments to both ASC and CSD clients.
Public Health Local Service Agreements	Audit	A follow-up of our previous work in this area which resulted in an overall opinion of minimal assurance.

INTERNAL AUDIT PLAN

2016-2017



Council Priority: Making Best Use of Resources

Review Name	Type	Outline Objective
Orbis Integrated Partnership Budget	Audit	A review of the mechanisms in place for governance and management of the integrated Orbis budget.
Orbis General	Advice and Support	To work with management to support the development of new systems, processes and working practices within the partnership to help ensure that a sufficiently robust framework of control remains in place. This will include a comparison of policy frameworks between the three Orbis partners (East Sussex County Council, Surrey County Council and Brighton and Hove City Council).
Procurement Transformation	Advice and Support	To provide advice and support into the procurement transformation programme, including the design of sourcing, purchasing and contract management systems.
Compliance with Procurement Standing Orders – Follow-Up	Audit	A follow-up of our previous work in this area which resulted in an overall opinion of partial assurance.
Property Transformation	Advice and Support	To provide advice, support and challenge on risk, governance and internal control matters in relation to property transformation and improvement initiatives, especially in light of the Orbis partnership.
Contract Management	Audit	As a continuation of previous audit work in this area, we will undertake a review of a sample of high risk and, where appropriate, joint contracts with Surrey County Council.
Capital	Audit	Following the independent external review of Capital, we will assess the extent to which the agreed recommendations arising from the review have been considered and implemented.
Freedom of Information, Environmental Information and Data Protection Act	Audit	To review the processes for dealing with Freedom of Information and Environmental Information requests, and also compliance with the Data Protection Act across the organisation, to ensure that legal responsibilities and codes of practice are adhered to.
Adult's Social Care LiquidLogic (LAS) & Controcc	Audit	A review to assess the adequacy of controls within the newly implemented LAS (client information and case management system) and Controcc (the social care payments and billing system). Also, input and advice into the Post Implementation Review of the LAS implementation.
Children's Social Care LiquidLogic (LCS) & Controcc	Audit	A review to assess the adequacy of controls within the newly implemented LCS (client information and case management system) and Controcc (the social care payments and billing system).
Accounts Payable (AP)	Audit	A key financial system. To review key controls relating to the procure-to-pay process, with particularly focus on E-invoicing and P-cards.

INTERNAL AUDIT PLAN

2016-2017



Review Name	Type	Outline Objective
Accounts Receivable (AR)	Audit	A key financial system. A review of controls over the collection and recording of income within the council, with specific focus on debt management arrangements.
HR/Payroll	Audit	A key financial system. A review of controls over the HR/Payroll function with specific focus on the recruitment process, including the use of Talentlink.
Pensions Governance, Investments and External Control Assurance	Audit	Key financial system. A review to assess the adequacy of East Sussex Pension Fund management and governance arrangements. Also, to examine arrangements for ensuring the adequacy of the control environment of the Pension Fund investment managers and custodian.
Pension Fund Processes and Systems	Audit	Key financial system. To review the key controls in relation to the calculation and payment of pensions, transfers to and from the pension fund and the collection and recording of pension contributions (incl. contributions from other admitted bodies).
Treasury Management	Audit	Key financial system. To review controls relating to borrowing and lending arrangements as part of the Treasury Management process (including long-term borrowing arrangements).
Music Service Income	Audit	A review of the Music Service billing mechanism, to include the identification, billing, collection and recording of income, and debt management arrangements.
Cultural Compliance	Audit	To continue our cyclical programme of reviews focussing on ensuring compliance with basic internal and management controls within teams across the organisation.
Staff Transfers and Leavers Follow-Up	Audit	A follow-up of our previous work in this area which resulted in an overall opinion of partial assurance.
Grant Work	Audit	Audit certification of a number of grant returns due to be submitted over the course of the year.
Cyber Security	Audit	To review the controls protecting the Council from cyber-attacks. The audit will focus on boundary firewalls and internet gateways, secure configuration, access control, malware protection and patch management.
Storage Area Network (SAN)	Audit	To review the adequacy of controls in relation to the Storage Area Network, including those relating to accessibility of data, adequacy of security and physical / environmental controls.
ICT Project Management	Audit	To review the procedures in place to ensure compliance with ICT and Business Strategies. Also to assess that Corporate Project Management Standards are followed and there is compliance with IT Project Management Methodology.
Microsites Follow-Up	Audit	To follow-up on the implementation of recommendations arising from the Microsites audit undertaken in 2016/17 which resulted in an audit opinion of minimal assurance.

INTERNAL AUDIT PLAN

2016-2017



Review Name	Type	Outline Objective
Cloud Computing	Audit	To review Cloud governance and information security risk management, contract compliance and monitoring. Also, to assess the level of protection and privacy of information assets in the Cloud and verify that that access to Cloud services are appropriately managed.
Orbis ICT	Audit	ICT systems and applications will inevitably play a crucial role in the various major projects and change initiatives taking place through Orbis. Resource has therefore been set aside to support this and to review emerging ICT related risks as they arise.
Legal Case Management System	Advice and Support	To provide input and advice into the implementation of a new Legal Service's case management system.
High Weald	Audit	A compliance audit to ensure that adequate and effective financial controls are in place to allow the annual return to be signed-off.