Time and Date
2.00 pm on Tuesday, 18th February, 2020

Place
Committee Room 3 - Council House

Public business

1. Apologies

2. Declarations of Interest

3. Minutes (Pages 3 - 10)
   (a) To agree the minutes from the meeting of Cabinet on 7th January 2020
   (b) Matters arising

   Report of the Deputy Chief Executive (Place)

5. Coventry Homefinder Review (Social Housing Allocations Policy) (Pages 39 - 184)
   Report of the Deputy Chief Executive (People)

6. European Social Fund 2014-2020 - European Structural & Investment Funds (ESIF) - Coventry ESF Second Round Applications (Pages 185 - 200)
   Report of the Deputy Chief Executive (People)

7. Coventry One Strategic Plan and Education Capital Programme (Pages 201 - 356)
   Report of the Deputy Chief Executive (People)

8. Authority for Attendance at Conference (Pages 357 - 360)
   To give retrospective approval of the Lord Mayor (Councillor L Bigham) and the Deputy Leader of the Council (Councillor AS Khan) attendance at the ‘Commemoration Events and International Congress on Cultures of Remembrance in Dresden’ that was held in Dresden, Germany from 12th to 15th February 2020.
9. **Outstanding Issues**

There are no outstanding issues

10. **Any other items of public business which the Chair decides to take as a matter of urgency because of the special circumstances involved.**

**Private business**
**Nil**

---

Martin Yardley, Deputy Chief Executive (Place), Council House, Coventry

Monday, 10 February 2020

---

Note: The person to contact about the agenda and documents for this meeting is Lara Knight / Michelle Salmon, Governance Services, Tel: 024 7697 2642 / 2643, Email: lara.knight@coventry.gov.uk / michelle.salmon@coventry.gov.uk

Cabinet Members:
Councillors K Caan, G Duggins (Chair), P Hetherton, A S Khan (Deputy Chair), T Khan, K Maton, J Mutton, M Mutton, J O’Boyle and P Seaman

Non-voting Deputy Cabinet Members:
Councillors P Akhtar, R Ali, B Gittins, G Lloyd and D Welsh

By invitation:
Councillors A Andrews and G Ridley (non-voting Opposition representatives)

Please note: a hearing loop is available in the committee rooms

If you require a British Sign Language interpreter for this meeting OR if you would like this information in another format or language please contact us.

Lara Knight / Michelle Salmon
Governance Services
Tel: 024 7697 2642 / 2643
Email: lara.knight@coventry.gov.uk / michelle.salmon@coventry.gov.uk
Councillors R Ali, K Caan and A S Khan declared disclosable pecuniary interests in matters the subject of Minutes 67 (Additional Licensing in Coventry – Consultation Results) and 68 (Selective Licensing in Coventry – Consultation Results).

They left the meeting for consideration of these items.
Minutes

The Minutes of the meeting held on 10 December were agreed and signed as a true record.

There were no matters arising.

Additional Licensing in Coventry – Consultation Results

Further to Minute 96/18, the Cabinet considered a report of the Deputy Chief Executive (Place), which set out the results of consultation on Additional Licensing in Coventry.

The report indicated that the Housing Act 2004, Part 2, provided a discretionary power, subject to carrying out consultation, for Local Housing Authorities to licence all private landlords in a designated area with the intention of ensuring that Houses in Multiple Occupation (HMOs) meet a minimum standard of management.

On the 8th January 2019, the Cabinet authorised officers to proceed with a citywide 10-week consultation beginning on the 9th January 2019 and ending on 20th March 2019. The consultation was undertaken in the form of online questionnaires, ward drop in sessions, focus groups and Member meetings. There were a mix of responses but with the highest number being from landlords and residents. The responses highlighted a number of issues that both residents of HMOs experience and residents living alongside HMOs. There was a strong support for the introduction of an Additional Licensing scheme, the fee structure was considered reasonable and proportionate by the majority, likewise there was support to manage the licence period depending upon the compliancy of the particular landlord. There were some concerns around the legality of the fee structure and how the length of licence would be determined in practice. These have been considered and addressed with some recommended amendments. The full consultation results were set out at Appendix 2 of the report submitted. The report also provided a summary and analysis of the consultation results and further recommendations.

In addition, a petition bearing 14 signatures was received objecting to the Additional Licensing and was set out within the report. The petition organiser was invited to the meeting for the consideration of this matter but did not attend. The petitioners were opposing the imposition of selective and additional licensing schemes and requested that the proposed licensing schemes be stopped.

It was proposed that a city-wide Additional Licensing scheme be extended to all HMOs in the city (in all 18 wards) and would include all smaller multiple occupied properties not currently subjected to mandatory HMO licensing. This would serve to address all HMOs whatever the size and ensure a level playing field for the quality and management of them.

RESOLVED that, the Cabinet:

1. Note the matters raised by the petitioners.
2. Having considered the consultation results attached at Appendix 2, request that Council approve the following: -

i. Designate the whole of Coventry City as subject to Additional Licensing under Section 56(1)(a) of the Housing Act 2004 for all Houses in Multiple Occupation (HMOs), irrespective of the number of storeys, that contain three or four occupiers;

ii. Designate the whole of Coventry City as subject to Additional Licensing under Section 56(1)(a) of the Housing Act 2004 for all HMOs as defined under Section 257 of that Act where those HMOs are mainly or wholly tenanted, including those with resident landlords;

iii. That the designations in paragraphs i and ii above come into force on the 4th May 2020 for a period of 5 years;

iv. Designate the Deputy Chief Executive (Place) to sign the Coventry City Council Designation of an Area for Additional Licensing of Houses in Multiple Occupation 2020 as attached at Appendix 7 in accordance with the provisions set out in 2M 3 of the Scheme of Delegations in the Council’s Constitution.

v. Resolve to adopt the proposed fees and charges structure as attached at Appendix 4 and review those fees annually to ensure they remain reasonable and proportionate and address any issues relating to surpluses or deficits in accordance with case law and the EU Services Directive; and

vi. Resolve to adopt the HMO Licensing Policy 2020 as attached at Appendix 3.

68. Selective Licensing in Coventry - Consultation Results

Further to Minute 95/18, the Cabinet considered a report of the Deputy Chief Executive (Place), which set out the results of consultation on Selective Licensing in Coventry.

The report indicated that the Housing Act 2004, Part 3, provided a discretionary power, subject to carrying out consultation and approval of the appropriate national authority, for Local Housing Authorities to licence all private landlords in a designated area with the intention of ensuring that a minimum standard of management is met.

On the 8th January 2019, the cabinet authorised a city-wide 10 week consultation beginning on 9th January 2019 and ending on 20th March 2019. The consultation was undertaken in the form of on-line questionnaires, ward drop in sessions, focus groups and Member meetings. There were a mix of responses with the highest number being from landlords and residents. Notably, there was an even balance between those in support and those against introducing selective licensing. However, detailed investigation revealed the strength of the views conveyed more were in strong disagreement than those strongly supporting. Furthermore, a much
higher proportion of respondents disagreed that the fee structure was reasonable and proportionate. Notwithstanding, the response to the principle of the scheme was generally support for mechanisms within the proposed scheme which included fee reduction criteria, higher fees for non-compliant landlords, longer licences for compliant landlords and conditions around property condition and management. Generally, there was a concern around how areas had been selected, the use of date from the 2011 Census, and, in particular Ward Councillors raised concern with some areas not being included where they considered there to be problems which brought the issue of out of date data into question further. The consultation results were set out in full in Appendix 2 of the report submitted.

It was noted that in April 2018, the Government Select Committee completed research which included evaluating Selective Licensing. More recently, in July 2019, the Government published findings from an independent review of the use and effectiveness of Selective Licensing Schemes. This review resulted in several recommendations which included looking at the criteria applied to engage validation by the Secretary of State for designations and the data sources used to specify the designated area. How the Government proposes to move forward is currently unknown. It is anticipated that changes to the current legislation will be implemented in due course. The report also provided a summary and analysis of the consultation results and a recommendation.

In addition, a petition bearing 14 signatures was received objecting to the Selective Licensing and was set out within the report. The petition organiser was invited to the meeting for the consideration of this matter but did not attend. The petitioners were opposing the imposition of selective and additional licensing schemes and requested that the proposed licensing schemes be stopped.

It was proposed that officers keep Selective Licensing under review, alongside the implementation of the Additional Licensing scheme, until such time as the conclusions of the Independent Review of Selective Licensing are published by Government. Once the results are published, officers should be in a better position to apply a more accurate, up to date statistical assessment, using appropriate evidence that should also become available. As such, the non-HMO private rented housing would continue to be managed using existing powers set out within the report. The Cabinet noted that if the Additional Licensing scheme is progressed as recommended, the team would increase and existing staff will be able to concentrate solely on the management of the non-HMO private rented housing using the relevant powers that already exist.

**RESOLVED that, the Cabinet:**

1. **Note the matters raised by the petitioners.**

2. **Having considered the consultation results attached at Appendix 2, request that Council approve the following:**

   a) **That the proposed Selective Licensing scheme not be progressed at this time**
b) That officers are instructed to review the conclusions of the Independent Review of Selective Licensing once these are published by Government and conduct an accurate, up to date statistical assessment, once appropriate evidence becomes available and report the findings to Cabinet at a future meeting.

69. **The 2020/21 Council Tax Base Report**

The Cabinet considered a report of the Deputy Chief Executive (Place), which established the 2020/21 Council Tax base for tax setting purposes.

The Council tax base was the measure of the taxable capacity of an area, for the purpose of calculating an authority’s Council Tax. It represented the estimated number of Band D equivalent chargeable dwellings for the year. It also took into account the authority’s estimated Council Tax collection rate.

The report made the necessary calculations in accordance with the Local Authorities (Calculation of Council Tax Base) Regulations 2012 to establish the Council tax base for the City Council and its parishes. These regulations applied to financial years beginning 1st April 2013 onwards, and included the impact of the change from awarding Council Tax benefit to the introduction of a Council Tax Support Scheme (also known as the Council Tax Reduction Scheme).

The report did not set the actual level of Council Tax in Coventry, that would be set by Council on 25th February 2020.

RESOLVED that, the Cabinet:

1. Approve that the Council Tax collection rate for 2020/21 be set at 98.3%.

2. Agree that, in accordance with the Local Authorities (Calculation of Tax Base) Regulations 2012, the amounts calculate by the City Council for 2020/21 shall be:

   a net tax base of 83,905.5 for the whole of the City Council area made up as follows:

<table>
<thead>
<tr>
<th>Parish</th>
<th>Amount</th>
</tr>
</thead>
<tbody>
<tr>
<td>Allesley Parish</td>
<td>337.6</td>
</tr>
<tr>
<td>Finham Parish</td>
<td>1552.2</td>
</tr>
<tr>
<td>Keresley Parish</td>
<td>239.7</td>
</tr>
<tr>
<td>All Other Coventry City Council Wards</td>
<td>81,776.0</td>
</tr>
<tr>
<td><strong>TOTAL</strong></td>
<td><strong>83,905.5</strong></td>
</tr>
</tbody>
</table>

3. That the following grant payments should be made to parish councils to reflect the impact in 2020/21 of Council Tax reductions on their tax bases:
Allesley Parish £895
Finham Parish £2,983
Keresley Parish £953
TOTAL £4,831

70. **Outcomes of Fair Funding Consultation 2020-2021**

The Cabinet considered a report of the Deputy Chief Executive (Place) that provided results of the consultation on proposed changes to the Fair Funding Scheme of Delegation (“the Scheme”) and seeks approval for recommended changes to the Scheme and the Fair Funding Formula.

Under Section 48 of the School Standards and Framework Act 1998, Local Authorities (LAs) are required to have schemes of delegation which set out the financial controls and arrangements that will operate between schools and the LA. Any proposed revisions to these schemes and / or Fair Funding Formula must be the subject of consultation and require approval by the Schools Forum.

The Department for Education (DfE) published the “Schools Revenue Funding 2020 to 2021: Operational Guide” which sets out the school revenue funding arrangements for 2020/21.

The DFE introduced its National Funding Formula (NFF) for LAs in 2018-19, whereby allocations for LAs were determined under the NFF approach, but LAs retained control over how they chose to distribute that funding amongst their schools. In Coventry the decision was made in 2018-19 and 2019-20 to mirror the NFF allocation for schools as far as possible as this provided all schools with a minimum 0.5% increase in funding per pupil.

The report indicated that there had not been any significant changes to the operation of the local school funding formula for 2020-21; with the main changes aimed at providing flexibility to allow LAs to deliver the Funding Floor (a net 1.84% per pupil funding increase compared with 2019-20) as set out in the NFF. It was proposed that corresponding changes be made to the funding formula and approval was sought of the Fair Funding Scheme of Delegation.

The consultation document was circulated on the 14th November 2019 to Head Teachers including Academy Head Teachers/Principals, Chairs of Governing Bodies, relevant Councillors, Trade Unions, Diocesan authorities, the Coventry Governors Association, members of the Schools Forum and Early Years Free Entitlement providers in the private, voluntary and Independent (PVI) sectors. The consultation period ended on 1st December 2019. This was a shorter consultation time than usual, as allowed by the DfE due to their delay in publishing some of the key funding information to LAs.

Stakeholder groups were briefed throughout the consultation period. These included Primary, Secondary and Special School Head Teacher Partnerships, Primary Finance representative head teachers, the Schools Trade Union representatives, and the Schools Forum. The consultation document also sought to act as an information document to school stakeholders regarding anticipated
local budget pressures. A summary of the responses to the consultation was provided at Appendix 1 of the report submitted.

RESOLVED that, the Cabinet:

1. Approve the recommended changes to the Fair Funding Formula and Fair Funding Scheme of Delegation, which were summarised in Section 3 of the report submitted.

2. Delegate authority to the Cabinet Member and Director of Education and Skills to make any necessary amendments to the final detail of these recommended changes, in order to comply with the School Finance (England) Regulations 2019 once full detail of the schools funding settlement has been published by the Department for Education for 2020/21. Any changes will be made following discussion with the Schools Forum as appropriate.

71. UKBIC Additional Grant Funding Award from Innovate UK

The Cabinet considered a report of the Deputy Chief Executive (Place), which detailed an additional grand funding award from Innovate UK to the UK Battery Industrialisation Centre (UKBIC).

The UKBIC is a cutting-edge research facility which will bridge the gap between battery research in universities and large-scale manufacturing. The project has been funded through Innovate UK alongside an £18m loan from the West Midlands Combined Authority (WMCA).

Following further industry engagement and technological developments, Innovate UK have offered a further £3.1m in order to fund and cover the increased costs and future proof against technology changes.

The report indicated that, between now and the end of the project, there would be further adjustments needed and more funding would be forthcoming which would ensure that the battery facility is able to adapt to technological changes. Authority was therefore sought to accept up to a total of £15m of additional funding from Innovate UK if additional cash beyond the £3.1m currently offered becomes available.

The UKBIC programme was part-way through development and progressing well. The programme is due for completion in March 2020, when the UKBIC facility will open for business. The shell core of the building had been completed and handed over and a team of 50 had been recruited to date to work for the new company UKBIC Ltd.

RESOLVED that, the Cabinet recommend that Council:

1. Authorise the Council to act as Accountable Body and accept £3.1m from Innovate UK and also to make the necessary adjustment to the Capital Programme.
2. Should further grant funding be made available by Innovate UK, authorise the Council to act as Accountable Body and accept up to a total sum of £15m and make the necessary adjustment as required to the Capital Programme.

3. Delegate authority to the Director of Business Investment and Culture, the Finance Manager (Corporate Resources) and the City Solicitor and Monitoring Officer, following consultation with the Cabinet Member for Jobs and Regeneration and the Cabinet Member for Strategic Finance and Resources, to undertake the necessary due diligence, negotiate the terms and conditions of the funding agreement with Innovate UK and enter into the necessary agreement to bring into legal effect the recommendations set out in 1 and 2 above.

72. **Outstanding Issues**

There were no outstanding issues.

73. **Authority for Attendance at Conference**

RESOLVED that, the Cabinet authorise the attendance of the Programme Delivery Manager (Mitigation) (Sumairah Miraj) and the Programme Officer MiFriendly Cities (Dajan Vasilj) at the Cities Forum 2020, being held in Porto, Portugal on the 30th and 31st January 2020.

Note: This matter was considered as urgent business, the reasons for urgency being to approve attendance at the conference at the earliest opportunity as the next meeting of Cabinet was scheduled to take place after the date of the conference.

74. **Any other items of public business which the Chair decides to take as a matter of urgency because of the special circumstances involved.**

There were no other items of public business.

(Meeting closed at 2.20 pm)
Name of Cabinet Member:
Cabinet Member for Strategic Finance and Resources - Councillor J Mutton

Director Approving Submission of the report:
Director of Finance and Corporate Services

Ward(s) affected:
City wide

Title:
2019/20 Third Quarter Financial Monitoring Report (to December 2019)

Is this a key decision?
No

Executive Summary:
The purpose of this report is to advise Cabinet of the forecast outturn position for revenue and capital expenditure and the Council’s treasury management activity as at the end of December 2019. The headline revenue forecast for 2019/20 is for a net underspend of £1.9m. At the same point in 2018/19 there was a projected underspend of £1.8m. The headline capital position reports £20.6m of expenditure rescheduled into 2020/21.

The largest areas of budget pressure are within services for Children and Young People and Housing and Homelessness which are projecting overspends of £2.6m and £3.2m respectively. These are offset by a significant underspend within central and contingency budgets.

The Council’s capital spending is projected to be £215.9m and includes major scheme expenditure including investment in the A46 Link Road, Whitley South infrastructure and the National Battery Plant.

Recommendations:
The Cabinet is requested to:

1) Approve the Council’s revenue monitoring position;
2) Approve the revised capital estimated outturn position for the year of £215.9m incorporating: £14m net increase in spending relating to approved/technical changes of and net rescheduling of expenditure into 2020/21 of £16.6m.
The Audit and Procurement Committee is requested to:

1) Consider the proposals in the report and forward any recommendations to the Cabinet.

List of Appendices included:

Appendix 1 Revenue Position: Detailed Directorate breakdown of forecast outturn position
Appendix 2 Capital Programme: Analysis of Budget/Technical Changes
Appendix 3 Capital Programme: Estimated Outturn 2019/20
Appendix 4 Capital Programme: Analysis of Rescheduling
Appendix 5 Prudential Indicators

Background papers:

None

Other useful documents

None

Has it been or will it be considered by Scrutiny?

No

Has it been or will it be considered by any other Council Committee, Advisory Panel or other body?

Audit and Procurement Committee 16th March 2020

Will this report go to Council?

No
Report title:
2019/20 Third Quarter Financial Monitoring Report (to December 2019)

1. Context (or background)

1.1 Cabinet approved the City Council's revenue budget of £231.5m on the 19th February 2019 and a Directorate Capital Programme of £195.4m. This is the third quarterly monitoring report for 2019/20 to the end of December 2019. The purpose is to advise Cabinet of the forecast outturn position for revenue and capital expenditure and to report on the Council’s treasury management activity.

1.2 The current 2019/20 revenue forecast is for an underspend of £1.9m. The reported forecast at the same point in 2018/19 was an underspend of £1.8m. Capital spend is projected to be £215.9m, a reduction of £2.8m since the quarter 2 forecast.

2. Options considered and recommended proposal

2.1 This is a budget monitoring report and as such there are no options.

2.2 Revenue Position - The revenue forecast position is analysed by service area below.

Table 1 - Forecast Variations

<table>
<thead>
<tr>
<th>Service Area</th>
<th>Revised Net Budget £m</th>
<th>Forecast Spend £m</th>
<th>Forecast Variation £m</th>
</tr>
</thead>
<tbody>
<tr>
<td>Public Health</td>
<td>1.3</td>
<td>0.9</td>
<td>(0.4)</td>
</tr>
<tr>
<td>People Directorate Management</td>
<td>1.5</td>
<td>1.5</td>
<td>0.0</td>
</tr>
<tr>
<td>Education &amp; Skills</td>
<td>12.7</td>
<td>14.3</td>
<td>1.4</td>
</tr>
<tr>
<td>Children &amp; Young People</td>
<td>73.7</td>
<td>76.3</td>
<td>2.6</td>
</tr>
<tr>
<td>Adult Social Care</td>
<td>77.4</td>
<td>77.4</td>
<td>0.0</td>
</tr>
<tr>
<td>Customer Services &amp; Transformation</td>
<td>13.6</td>
<td>16.9</td>
<td>3.3</td>
</tr>
<tr>
<td>Human Resources</td>
<td>1.3</td>
<td>1.7</td>
<td>0.4</td>
</tr>
<tr>
<td>Place Directorate Management</td>
<td>2.6</td>
<td>2.7</td>
<td>0.1</td>
</tr>
<tr>
<td>Business Investment &amp; Culture</td>
<td>7.2</td>
<td>7.4</td>
<td>0.2</td>
</tr>
<tr>
<td>Transportation &amp; Highways</td>
<td>4.6</td>
<td>4.8</td>
<td>0.2</td>
</tr>
<tr>
<td>Streetscene and Regulatory</td>
<td>28.2</td>
<td>29.9</td>
<td>1.7</td>
</tr>
<tr>
<td>Project Management &amp; Property</td>
<td>(8.0)</td>
<td>(8.8)</td>
<td>(0.8)</td>
</tr>
<tr>
<td>Finance &amp; Corporate Services</td>
<td>7.4</td>
<td>6.8</td>
<td>(0.6)</td>
</tr>
<tr>
<td>Contingency &amp; Central Budgets</td>
<td>6.7</td>
<td>3.3</td>
<td>(10.0)</td>
</tr>
<tr>
<td><strong>Total Spend</strong></td>
<td><strong>230.2</strong></td>
<td><strong>228.5</strong></td>
<td><strong>(1.9)</strong></td>
</tr>
</tbody>
</table>

2.3 An explanation of the major forecast variances is provided below. Further details are provided in Appendix 1.
People Directorate
The People Directorate continues to face significant financial challenges in 2019/20 and beyond. The largest forecast pressure is Housing & Homelessness (temporary accommodation) £3.2m which has resulted from the level of activity transferring to the Council from the previously outsourced contract, the additional and less costly temporary accommodation solutions not being available as early in the financial year as previously forecast, and an increase in activity in the second and third quarters particularly within the non-family cohort. Work is underway, overseen by Strategic Housing Board, to reduce the cost of supporting families and individuals in temporary accommodation. The service is now in a position where it understands the causes of the long standing financial pressures and has a number of strategies in place to significantly reduce the cost over 2020/21. This is through a combination of increasing prevention, reducing activity and considerably decreasing the cost of provision. For example, Caradoc Hall (102 units) is now open and fully occupied. From the new financial year the Council will also have a further 75 lower cost temporary accommodation options for families. In addition, a number of lower cost temporary accommodation options for non-families are being explored, with the aim of them opening part way through the financial year.

There has been a £1.1m increase in forecast across the People Directorate since quarter 2 which is largely attributable to a small worsening position on Housing and Homelessness, and more significantly, increased cost of LAC and leaving care placements. This is due to delays in the delivery of Children’s placement transformation and a higher unit cost of placements, partly attributable to the youth violence problems. Children’s Transformation Board continues to monitor the progress of LAC placement transformation and associated budget reductions and take remedial action as necessary. We also have a £1.0M pressure in SEN transport which is linked to increasing demand and changes in provision. Strategic Transport group continue to review this and consider any steps that can be taken to reduce cost. The pre-budget report identified additional resource for the above 3 areas in 2020/21.

Adult Social Care is showing a balanced position, although there is increasing pressure surrounding packages of care alongside increasing demand in Deprivation of Liberty safeguards (DOLs) which are managed in year using iBCF protecting social care resources. The Public Health underspend relates to the holding of migration grant income centrally which is funding costs of other services across the Council.

Place Directorate
The Place Directorate is forecasting a net £0.8m deficit at quarter 3. Higher than budgeted costs in the directorate of around c£2m are being offset by net increased income of c£1.2m. The compensating variations contributing to these figures are explained as follows:

£1.5m of the overall spend pressure relates to a variety of service areas which have required the use of agency staff to maintain service continuity or deal with higher than normal service activity levels. Parking enforcement (£0.1m), streetpride (£0.4m), domestic refuse (£0.3m), CCTV (£0.1m), Revenues and Benefits (£0.2m) and Legal services (£0.4m) have all required agency to cover e.g. sickness, vacancies or activity levels where service continuity is a requirement. In most cases, the funding for this cover is within the centralised budgets and variation below.

Other spend pressures are a higher than budgeted cost of waste disposal (£0.45m), and the higher cost of domestic refuse collection (£0.2m) due to higher fleet costs and cost of collection over the Christmas period.

Net increased income of c£1.2m is offsetting some of the pressures. In most cases, services are generating more income including car parking (£0.4m), building control (£0.17m), regulatory services (£0.2m), property (£0.8m) and benefits subsidy (£1m) are all generating
more income than is currently budgeted. However, there are other services which due to lower than normal activity are achieving insufficient income compared to budget, the primary ones being bus gate enforcement (£0.55m) and Bereavement services (£0.4m).

**Contingency and Central Budgets**

In overall terms this budget area is projected to underspend by £10m.

The large improvement since quarter 2 is due to £3.1m of employer pension contributions no longer due to be paid to the West Midlands Pension Fund. The Council has budgeted for a higher payroll and employer pension contributions than anticipated when fixed contributions were agreed with the Pension Fund 3 years ago. The Fund has confirmed that it is not expecting these amounts to be paid over to it and that it has taken account of this in calculating the Council’s revised contributions for future years. Therefore, the over-budgeted sums can now be released to the Council’s bottom line.

Net Asset Management Revenue Account expenditure is anticipated to be £2.4m less than budget because of lower costs of capital financing, higher investment income and higher loan income. Other corporate budgets reflect lower than budgeted pension costs linked to an early payment arrangement with the West Midlands Pension Fund (£2m); uncommitted resources related to one-off social care funding (£1m); Coventry and Warwickshire Business Rate Pool income in excess of budget (£1.1m); projected additional savings from the Friargate Project (£0.75m); lower than budgeted levy costs (£0.6m); and a contribution to reserves for managing the costs of major projects approved at quarter 2.

2.4 **Capital Position** - The 2019/20 capital outturn position for quarter two reported a revised outturn position of £218.7m compared with the original programme reported to Cabinet in February 2019 of £195.3m. Table 2 below updates the budget at quarter 3 to take account of a £14m increase in the programme from approved/technical changes, £16.6m of net rescheduling now planned to be carried forward into future years and a small £0.2m underspend. This will not result in the Council losing any funding. In total, the revised projected level of expenditure for 2019/20 is £215.9m. Appendix 3 provides an analysis by directorate of the movement since budget setting.

The Resources Available section of Table 2 explains how the Capital Programme will be funded in 2019/20. It shows 72% of the programme is funded by external grant monies, whilst 22% is funded from borrowing. The programme also includes funding from capital receipts of £8.3m.

**Table 2 – Movement in the Capital Budget**

<table>
<thead>
<tr>
<th>CAPITAL BUDGET 2019-20 MOVEMENT</th>
<th>Qtr 3 Reporting £m</th>
</tr>
</thead>
<tbody>
<tr>
<td>Estimated Outturn Quarter 2</td>
<td>218.7</td>
</tr>
<tr>
<td>Approved / Technical Changes (see Appendix 2)</td>
<td>14.0</td>
</tr>
<tr>
<td>“Net Underspend”</td>
<td>(0.2)</td>
</tr>
<tr>
<td>“Net” Rescheduling into future years (see Appendix 4)</td>
<td>(16.6)</td>
</tr>
<tr>
<td>Revised Estimated Outturn 2019-20</td>
<td>215.9</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>RESOURCES AVAILABLE:</th>
<th>Qtr 3 Reporting £m</th>
</tr>
</thead>
<tbody>
<tr>
<td>Prudential Borrowing (Specific &amp; Gap Funding)</td>
<td>47.0</td>
</tr>
<tr>
<td>Grants and Contributions</td>
<td>154.7</td>
</tr>
</tbody>
</table>
2.5 **Treasury Management**

**Interest Rates**

The current Bank of England Base Rate has been at 0.75% since August 2018. The global economy has entered a period of slower growth in response to political issues and the UK economy continues to experience slower growth due to both Brexit uncertainty and the downturn in global activity.

The central forecast for the Bank Rate is to remain at 0.75% until at least the end of 2022. However, the risk to this forecast is heavily weighted to the downside. With comments made by the Bank of England and recent poor performance in economic data meaning that a rate cut in the near future is more likely.

**Long Term (Capital) Borrowing**

The net long term borrowing requirement for the 2019/20 Capital Programme is £38.1m, taking into account borrowing set out in section 2.4 above (total £47.0m), less amounts to be set aside to repay debt, including non PFI related Minimum Revenue Provision (£8.9m). Although the Council’s recent Capital Programmes have incorporated prudential borrowing as part of the overall resourcing package, no long-term borrowing has been undertaken for several years, due in part to the level of investment balances available to the authority. The anticipated future high level of capital spend combined with the new lower level of investment balances available mean that the Council will need to keep this under review over the next few years. The actual pattern of these factors and the level and expected movement in interest rates will dictate when the Council next seeks to borrow although current advice remains for any borrowing to be of a short-term duration.

During 2019/20 interest rates for local authority borrowing from the Public Works Loans Board (PWLB) have varied within the following ranges:

<table>
<thead>
<tr>
<th>PWLB Loan Duration (maturity loan)</th>
<th>Minimum 2019/20 to P9</th>
<th>Maximum 2019/20 to P9</th>
<th>As at the End of P9</th>
</tr>
</thead>
<tbody>
<tr>
<td>5 year</td>
<td>1.20%</td>
<td>2.63%</td>
<td>2.63%</td>
</tr>
<tr>
<td>50 year</td>
<td>1.77%</td>
<td>3.25%</td>
<td>3.25%</td>
</tr>
</tbody>
</table>

The PWLB now allows qualifying authorities, including the City Council, to borrow at 0.2% below the standard rates set out above. This “certainty rate” initiative provides a small reduction in the cost of future borrowing.

On 9th October the Treasury increased the interest rate of PWLB borrowing by 1% in response to the high levels of borrowing and record lows that the PWLB interest rates had fallen to. This will have the impact of increasing the cost of any long-term borrowing taken out after this date. However, The Council has no plans to take any new long term borrowing in the near future with advice continuing to be to keep any borrowing to a short-term duration.

Regular monitoring continues to ensure identification of any opportunities to reschedule debt by early repayment of more expensive existing loans replaced with less expensive new loans. The premiums payable on early redemption usually outweigh any potential savings.
Short Term (Temporary) Borrowing and Investments
In managing the day to day cash-flow of the authority, short-term borrowing or investments are undertaken with financial institutions and other public bodies. As at 31/12/2019 the City Council held £34m of short term borrowing from other public bodies at an average interest rate of 0.93%.

Returns provided by the Council’s short-term investments yield an average interest rate of 1.06%. This rate of return reflects low risk investments for short to medium durations with UK banks, Money Market Funds, Certificates of Deposits, other Local Authorities, Registered Providers and companies in the form of corporate bonds.

Although the level of investments varies from day to day with movements in the Council’s cash-flow, investments held by the City Council identified as a snap-shot at each of the reporting stages were:

<table>
<thead>
<tr>
<th></th>
<th>As at 31st December 2018</th>
<th>As at 30th September 2019</th>
<th>As at 31st December 2019</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>£m</td>
<td>£m</td>
<td>£m</td>
</tr>
<tr>
<td>Banks and Building Societies</td>
<td>6.0</td>
<td>5.0</td>
<td>0.0</td>
</tr>
<tr>
<td>Money Market Funds</td>
<td>20.6</td>
<td>0.4</td>
<td>5.2</td>
</tr>
<tr>
<td>Local Authorities</td>
<td>15.0</td>
<td>0.0</td>
<td>0.0</td>
</tr>
<tr>
<td>Corporate Bonds</td>
<td>3.3</td>
<td>9.0</td>
<td>5.8</td>
</tr>
<tr>
<td>Registered Providers</td>
<td>0.0</td>
<td>10.0</td>
<td>10.0</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td><strong>44.9</strong></td>
<td><strong>24.4</strong></td>
<td><strong>21.0</strong></td>
</tr>
</tbody>
</table>

External Investments
In addition to the above investments, a mix of Collective Investment Schemes or “pooled funds” is used, where investment is in the form of sterling fund units and non-specific individual investments with financial institutions or organisations. These funds are generally AAA rated, are highly liquid as cash, can be withdrawn within two to four days, and short average duration. The Sterling investments include Certificates of Deposits, Commercial Paper, Corporate Bonds, Floating Rate Notes, Call Account Deposits and Equities. These pooled funds are designed to be held for longer durations, allowing any short-term fluctuations in return to be smoothed out. In order to manage risk these investments are spread across a number of funds.

As at 31st December 2020 the pooled funds were valued at £29.5m, spread across the following funds: CCLA, Schroders, Investec, Columbia Threadneedle and M&G Investments.

Prudential Indicators and the Prudential Code
Under the CIPFA Prudential Code for Capital Finance authorities are free to borrow, subject to them being able to afford the revenue costs. The framework requires that authorities set and monitor against a number of Prudential Indicators relating to capital, treasury management and revenue issues. These indicators are designed to ensure that borrowing entered into for capital purposes was affordable, sustainable and prudent. The purpose of the indicators is to support decision making and financial management, rather than illustrate comparative performance.
The indicators, together with the relevant figures as at 31st December 2019 are included in Appendix 5. This highlights that the City Council's activities are within the amounts set as Performance Indicators for 2019/20. Specific points to note on the ratios are:

- The Upper Limit on Variable Interest Rate Exposures (indicator 9) sets a maximum amount of net borrowing (borrowing less investments) that can be at variable interest rates. At 31st December the value is £43.7m (minus) compared to +£84.5m within the Treasury Management Strategy, reflecting the fact that the Council has more variable rate investments than variable rate borrowings at the current time.

- The Upper Limit on Fixed Interest Rate Exposures (indicator 9) sets a maximum amount of net borrowing (borrowing less investments) that can be at fixed interest rates. At 31st December the value is £249.7m compared to £422.4m within the Treasury Management Strategy, reflecting that a significant proportion of the Council's investment balance is at a fixed interest rate.

3. Results of consultation undertaken

3.1 None

4.1 Timetable for implementing this decision

4.2 There is no implementation timetable as this is a financial monitoring report.

4. Comments from the Director of Finance and Corporate Services

4.1 Financial implications

**Revenue**

In overall terms, this report indicates that the Council’s financial position for the current year continues to be sound. As with previous quarters the position incorporates individual underspends that cannot be relied upon beyond 2019/20. In contrast, there are services that are reporting overspends within demand led budget areas where it is more difficult for the Council to exercise complete control. The position in these service areas has worsened once again at quarter 3, principally within Children’s Services. It is inevitable that much of these additional pressures will continue into the 2020/21 financial year and for this reason these are being included within the Council’s final Budget proposals for next year.

These pressures include ones that reflect what appear to be intractable long-term trends, including the cost and complexity of Looked After Children placements and costs across Homelessness and Housing, Special Educational Needs and Waste Services. The continued trend of additional pressure within demand led services and the impact of delays in implementing successful measures to tackle such issues were reported at quarter 2 as evidence of the need for the Council to continue to identify medium term cost efficiencies and commercial opportunities in order to maintain financial stability. The Council will shortly be approving its 2020/21 Budget but attention is already turning to the Budget strategy for future years.

Given the uncertainty facing local government finances beyond 2020/21, the Director of Finance and Corporate Services is clear that the Council needs to take measures to protect its financial position in the short-term to provide some protection against any financial shocks over the next few years. The Council is facing significant financial budget shortfalls over the medium term and an unpredictable picture in relation to how the Government will implement the Spending Review, a new local government finance formula and a revised Business Rates retention scheme. In the interim, the Council needs to ensure that it continues to hold a strong
focus on managing services within existing budgetary limits or moving towards this. This includes continuing to implement transformational change to deliver existing savings plans, ensuring that demand for services is managed within existing policy parameters and identifying new ways of responding to service pressures to control costs.

The relatively positive position reported at quarter 3 should not deflect from the expectation of a very challenging outlook for the Council’s revenue position and officer attention both at a corporate level and across services is focussed strongly on responding to these challenges.

Like many councils Coventry is experiencing pressure on its high needs budget as a result of a significant increase in activity across the city. For the first time in 2019/20 the centrally retained DSG is forecast to overspend in-year by £0.8M. This will be funded from the dedicated schools grant centrally retained reserve. Coventry has received additional money for High Needs in 2020/21, although the trajectory of these costs indicates that expenditure will continue to increase in future years and there is a current national dialogue with Government on this issue. Council officers are maintaining a watching brief on this issue.

**Capital**

The 2019/20 programme includes significant spend on schemes including the National Battery Manufacturing Development Facility, Whitley South Infrastructure, the Coventry Station Masterplan, the Higgs Centre 50m Swimming Pool and the UK Central transportation programme. Of these schemes there is a significant risk that the Coventry Station Masterplan will not be able to deliver its original scope within budget due to a significant increase in the Network Rail cost estimate for phase 3 and discussions are on-going in respect of the scope and phasing of outstanding works.

The overall level of rescheduling of £16.6m is distributed across a wide range of projects reflecting a more accurate assessment of expectations as the year-end approaches. None of the rescheduled programmes will result in any funding being lost to the Council.

The increase in the programme of £14m comprises new grant funding of £9m for the UK BIC Project (bringing the total Grant from Innovate UK to £111m) and £5m use of capital receipts for the purchase of the B&M Store approved at Cabinet on 8th October 2019.

4.2 Legal implications

None

5. Other implications

5.1 How will this contribute to the Council Plan ([www.coventry.gov.uk/councilplan/](http://www.coventry.gov.uk/councilplan))?  

The Council monitors the quality and level of service provided to the citizens of Coventry and the key objectives of the Council Plan. As far as possible it will try to deliver better value for money and maintain services in line with its corporate priorities balanced against the need to manage with fewer resources.

5.2 How is risk being managed?

The need to deliver a stable and balanced financial position in the short and medium term is a key corporate risk for the local authority and is reflected in the corporate risk register. Budgetary control and monitoring processes are paramount in managing this risk and this report is a key part of the process.
5.3 **What is the impact on the organisation?**

It remains important for the Council to ensure that strict budget management continues to the year-end. Any resources available at year-end will be managed to ensure the Council's financial resilience or used to fund future spending priorities.

5.4 **Equalities / EIA**

No impact.

5.5 **Implications for (or impact on) the environment**

No impact at this stage although climate change and the environmental impact of the Council's decisions are likely to feature more strongly in the future.

5.6 **Implications for partner organisations?**

No impact.
Report author(s):

Name and job title:
Paul Jennings
Finance Manager Corporate Finance

Directorate:
Place

Tel and email contact:
Tel: 02476 977228
Email: paul.jennings@coventry.gov.uk

Enquiries should be directed to the above person.

<table>
<thead>
<tr>
<th>Contributor/approver name</th>
<th>Title</th>
<th>Directorate or organisation</th>
<th>Date doc sent out</th>
<th>Date response received or approved</th>
</tr>
</thead>
<tbody>
<tr>
<td>Contributors:</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Lara Knight</td>
<td>Governance Services Coordinator</td>
<td>Place</td>
<td>28/1/20</td>
<td>28/1/20</td>
</tr>
<tr>
<td>Helen Williamson</td>
<td>Lead Accountant</td>
<td>Place</td>
<td>20/1/20</td>
<td>20/1/20</td>
</tr>
<tr>
<td>Paul Hammond</td>
<td>Accountant</td>
<td>Place</td>
<td>20/1/20</td>
<td>20/1/20</td>
</tr>
<tr>
<td>Michael Rennie</td>
<td>Lead Accountant</td>
<td>Place</td>
<td>20/1/20</td>
<td>20/1/20</td>
</tr>
<tr>
<td>Names of approvers for submission: (officers and members)</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Barry Hastie</td>
<td>Director of Finance and Corporate Services</td>
<td>Place</td>
<td>23/1/20</td>
<td>23/1/20</td>
</tr>
<tr>
<td>Carol Bradford</td>
<td>Corporate Governance Lawyer</td>
<td>Place</td>
<td>28/1/20</td>
<td>29/1/20</td>
</tr>
<tr>
<td>Councillor J Mutton</td>
<td>Cabinet Member Strategic Finance and Resources</td>
<td>-</td>
<td>29/1/20</td>
<td>29/1/20</td>
</tr>
</tbody>
</table>

This report is published on the council's website: [www.coventry.gov.uk/councilmeetings](http://www.coventry.gov.uk/councilmeetings)
Appendix 1 Revenue Position: Detailed Directorate Breakdown of Forecasted Outturn Position

Appendix 1 details directorates forecasted variances.

Budget variations have been analysed between those that are subject to a centralised forecast and those that are managed at service level (termed “Budget Holder Forecasts” for the purposes of this report). The Centralised budget areas relate to salary costs – the Council applies strict control over recruitment such that managers are not able to recruit to vacant posts without first going through rigorous processes. In this sense managers have to work within the existing establishment structure and salary budgets are not controlled at this local level. The Centralised salaries and Overheads under-spend shown below is principally the effect of unfilled vacancies.

<table>
<thead>
<tr>
<th>Directorate</th>
<th>Revised Budget</th>
<th>Forecast Spend After Action/Use of Reserves</th>
<th>Centralised Forecast Variance</th>
<th>Budget Holder Forecast Variance</th>
<th>Net Forecast Variation</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>£m</td>
<td>£m</td>
<td>£m</td>
<td>£m</td>
<td>£m</td>
</tr>
<tr>
<td>Public Health</td>
<td>1.3</td>
<td>0.9</td>
<td>0.0</td>
<td>(0.4)</td>
<td>(0.4)</td>
</tr>
<tr>
<td>People Directorate Management</td>
<td>1.5</td>
<td>1.5</td>
<td>0.0</td>
<td>0.0</td>
<td>0.0</td>
</tr>
<tr>
<td>Education and Skills</td>
<td>12.7</td>
<td>14.3</td>
<td>(0.1)</td>
<td>1.5</td>
<td>1.4</td>
</tr>
<tr>
<td>Children and Young People’s Services</td>
<td>73.7</td>
<td>76.3</td>
<td>(1.7)</td>
<td>4.3</td>
<td>2.6</td>
</tr>
<tr>
<td>Adult Social Care</td>
<td>77.4</td>
<td>77.4</td>
<td>(0.5)</td>
<td>3.8</td>
<td>3.3</td>
</tr>
<tr>
<td>Customer Services &amp; Transformation</td>
<td>13.6</td>
<td>16.9</td>
<td>(0.5)</td>
<td>3.8</td>
<td>3.3</td>
</tr>
<tr>
<td>Human Resources</td>
<td>1.3</td>
<td>1.7</td>
<td>0.2</td>
<td>0.2</td>
<td>0.4</td>
</tr>
<tr>
<td><strong>Total People Directorate</strong></td>
<td><strong>181.5</strong></td>
<td><strong>189.0</strong></td>
<td><strong>(2.6)</strong></td>
<td><strong>9.9</strong></td>
<td><strong>7.3</strong></td>
</tr>
<tr>
<td>Place Directorate Management</td>
<td>2.6</td>
<td>2.7</td>
<td>0.0</td>
<td>0.1</td>
<td>0.1</td>
</tr>
<tr>
<td>City Centre &amp; Major Projects Development</td>
<td>7.2</td>
<td>7.4</td>
<td>0.1</td>
<td>0.1</td>
<td>0.2</td>
</tr>
<tr>
<td>Transportation &amp; Highways</td>
<td>4.6</td>
<td>4.8</td>
<td>0.0</td>
<td>0.2</td>
<td>0.2</td>
</tr>
<tr>
<td>Streetscene &amp; Regulatory Services</td>
<td>28.2</td>
<td>29.9</td>
<td>(0.2)</td>
<td>1.9</td>
<td>1.7</td>
</tr>
<tr>
<td>Project Management and Property Services</td>
<td>(8.0)</td>
<td>(8.8)</td>
<td>0.0</td>
<td>0.0</td>
<td>(0.8)</td>
</tr>
<tr>
<td>Finance &amp; Corporate Services</td>
<td>7.4</td>
<td>6.8</td>
<td>(0.1)</td>
<td>(0.5)</td>
<td>(0.6)</td>
</tr>
<tr>
<td><strong>Total Place Directorate</strong></td>
<td><strong>42.0</strong></td>
<td><strong>42.8</strong></td>
<td><strong>(0.2)</strong></td>
<td><strong>1.0</strong></td>
<td><strong>0.8</strong></td>
</tr>
<tr>
<td><strong>Total Contingency &amp; Central Budgets</strong></td>
<td><strong>6.7</strong></td>
<td>(3.3)</td>
<td>0.0</td>
<td>(10.0)</td>
<td>(10.0)</td>
</tr>
<tr>
<td><strong>Total Spend</strong></td>
<td><strong>230.2</strong></td>
<td><strong>228.3</strong></td>
<td><strong>(2.9)</strong></td>
<td><strong>0.9</strong></td>
<td><strong>(1.9)</strong></td>
</tr>
<tr>
<td>Resourcing</td>
<td>(231.4)</td>
<td>(231.4)</td>
<td>0.0</td>
<td>0.0</td>
<td>0.0</td>
</tr>
<tr>
<td>Ringfenced Funding Streams</td>
<td>1.2</td>
<td>1.2</td>
<td>0.0</td>
<td>0.0</td>
<td>0.0</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td><strong>0.0</strong></td>
<td>(1.9)</td>
<td>(2.8)</td>
<td><strong>0.9</strong></td>
<td><strong>(1.9)</strong></td>
</tr>
<tr>
<td>Reporting Area</td>
<td>Explanation</td>
<td>£m</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>----------------</td>
<td>---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------</td>
<td>-----</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Centralised (non-controllable variances)</td>
<td>The Directorate underspend against its salary budgets and turnover target is mainly due to continuing vacancies in Customer Services, Housing, Adult and Childrens Social Care. This is partially offset by a non-salary overspend included above (e.g. agency, overtime). The position is less underspent than in 18/19 (£5.5M underspend) as a number of vacancies have been filled. It is expected that vacancy levels and agency costs will continue to reduce, which will continue to reduce the centralised salary underspend and the budget holder overspend relating to staffing.</td>
<td>(2.6)</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>People Directorate</td>
<td>The directorate has gross underspends of £2.7m for centralised salaries. This has been offset by the turnover target for the same services of £2.5m, creating a net 'surplus' of £0.2m. Overall however, as described above, there are still a number of vacancies or other resourcing requirements which have been covered using agency staff to ensure services can be maintained. These costs are included in the service narratives. The underlying position is that an estimated £1.5m of the centralised budget for salaries is required to fund agency cover included in the deficits described above, therefore the turnover target for centrally funded posts has not been achieved.</td>
<td>(0.2)</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Total Non-Controllable Variances</td>
<td></td>
<td>(2.8)</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Service Area</td>
<td>Reporting Area</td>
<td>Explanation</td>
<td>£M</td>
<td></td>
<td></td>
</tr>
<tr>
<td>--------------</td>
<td>----------------</td>
<td>-------------</td>
<td>----</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Public Health</td>
<td>Public Health - Migration</td>
<td>This underspend relates to the holding of migration grant income centrally which is funding costs of other services across the Council.</td>
<td>(0.5)</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Public Health</td>
<td>Other Variances Less than 100K</td>
<td></td>
<td>0.1</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Education and Skills</td>
<td>SEND &amp; Specialist Services</td>
<td>The significant increase in the number of pupils entitled to home to school/college travel assistance, is underpinned by a growth in both non-SEN and SEN school placements. Capacity limitations on the in-house fleet required an interim response of short-term taxi commissions to meet demand thereby inflating mid-year unit costs. This has been subsequently mitigated by a further investment in fleet expansion. The requirement to provide personalised arrangements for children who are unable to travel safely on a mini-bus has increased significantly, all reasonable measures are in place to monitor and challenge this element of provision whilst ensuring the Council continues to meet its statutory duty.</td>
<td>1.2</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Education and Skills</td>
<td>Employment &amp; Adult Education</td>
<td>To date it has not been possible to deliver a £200k financial savings target set as part of previous budget setting processes to ensure we maximise ESFA grant funding against internal training programmes.</td>
<td>0.2</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Education and Skills</td>
<td>Other Variances less than £100k</td>
<td></td>
<td>0.1</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Education and Skills</td>
<td></td>
<td></td>
<td>1.5</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Children and Young People's Services</td>
<td>Children's Services Management Team</td>
<td>The service has delivered savings as a result of service changes and review. These support the delivery of the Children's Services Transformation programme in the current and future years.</td>
<td>(1.0)</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Children and Young People's Services</td>
<td>Commissioning, QA and Performance</td>
<td></td>
<td>0.2</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Service Area</td>
<td>Team</td>
<td>Variance Description</td>
<td>Variance</td>
<td></td>
<td></td>
</tr>
<tr>
<td>------------------------------------------------</td>
<td>-----------------------</td>
<td>----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------</td>
<td>----------</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Children and Young People's Services</td>
<td>Help &amp; Protection</td>
<td>The budget holder variance largely relates to the costs of agency staff covering vacancies across the service. This is more than offset by underspends across centralised salary budgets. We continue to recruit permanent social workers and reduce agency staff levels as part of the Workforce Transformation.</td>
<td>0.7</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Children and Young People's Services</td>
<td>LAC &amp; Care Leavers</td>
<td>The variance is largely as a result of the placement pressures (£1.9M net overspend). Children in external children's homes are above projected numbers and there have been some high cost placements as a consequence of youth violence. The supported accommodation continues to show an overspend as a result of activity and high cost placements (£0.8M). The forecast in these areas has worsened since QTR 2 by £1.1M, and work is underway to understand the impact of this on 20/21 financial year in the context of the Children's Transformation Programme. There are a number of other variances across the service as a result of activity pressure (care leavers, permanence allowances of £0.4M) and agency costs of in excess of £0.5M partially offset by a centralised salary underspend.</td>
<td>4.4</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Children &amp; Young People's Services</td>
<td></td>
<td></td>
<td>4.3</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Adult Social Care</td>
<td>Adult Social Care</td>
<td>The majority of the underspend represents the use of iBCF resources to manage the financial position. These resources are available to manage Adult Social Care pressures. The level of demand is increasing at higher than levels estimated at the start of the year. The contributory factors to this are described in the specific sections below. This rising demand on the grant, which is cash limited, will reduce the ability to absorb further increases this year and in subsequent years.</td>
<td>(2.0)</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Adult Social Care</td>
<td>Older People</td>
<td>Additional costs of agency staff pending recruitment but overall staffing slightly underspent.</td>
<td>0.1</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Adult Social Care</td>
<td>All Age Disability</td>
<td>There remains significant pressures in Deprivation of Liberty Assessment demand leading to additional assessment costs. The All Age Disability Team has also seen increasing demand and a high turnover of staff leading to increased Agency costs, recruitment to posts is ongoing.</td>
<td>0.6</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Adult Social Care</td>
<td>Community Purchasing</td>
<td>Whilst the iBCF grant has been provided to manage pressures (see Adult Social Care Director line), pressure remains within Older People Community Purchasing budgets from continuing demands for Residential</td>
<td>0.2</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
placements. Work is underway to provide more cost effective alternatives.

<table>
<thead>
<tr>
<th>Adult Social Care</th>
<th>All Age Disability and Mental Health Community Purchasing</th>
<th>Whilst the iBCF grant has been provided to manage pressures (see Adult Social Care Director line), higher than expected increased demands across Mental Health services is putting additional pressure on the financial position.</th>
<th>1.7</th>
</tr>
</thead>
<tbody>
<tr>
<td>Adult Social Care</td>
<td>Other Variances less than £100k</td>
<td></td>
<td>(0.1)</td>
</tr>
<tr>
<td>Adult Social Care</td>
<td>Customer and Business Services</td>
<td>Vacancies have been held post Business Services change to align the work and understand where best to place the resource, recruitment is under way at the moment however we are staggering this. Some of these posts will be given back at the end of the financial year to meet transferred Business Services savings target. There is a restructure of the PA function underway which will introduce new roles and may result in some redundancies. Vacancies are being held until this review concludes and temporary resource is being used in the interim. Once concluded (Apr/May) new positions will be recruited to on a permanent basis. This review has been delayed at various points which has resulted in a budget holder variance.</td>
<td>0.5</td>
</tr>
<tr>
<td>Customer Services &amp; Transformation</td>
<td>ICT &amp; Digital</td>
<td>The majority of the overspend relates to the need to accelerate the refresh of part of the PC estate to avoid potential significant ICT service problems within the service and possibly across the wider organisation. Action being taken to reduce the overspend includes reviewing sources of funding and reducing spend temporarily in other ICT areas e.g. mobile phones. There is also a net 40K under-recovery of traded income</td>
<td>0.3</td>
</tr>
<tr>
<td>Customer Services &amp; Transformation</td>
<td>Transformation Programme Office</td>
<td>Variance has changed this quarter to better reflect potential spend against the Professional Fees budget line, at this stage in the year. Use of this budget is unpredictable as it is dependent on organisational transformation plans and internal/external resource requirements to deliver this.</td>
<td>(0.1)</td>
</tr>
<tr>
<td>Customer Services &amp; Transformation</td>
<td>Housing &amp; Homelessness</td>
<td>Housing and Homelessness is forecasting an overspend of £3.2m due to a combination of continued and increased demand, activity transferring to the council from the previously outsourced contract and the additional and less costly Temporary Accommodation solutions not being available in quarter 3 as previously forecast. Although an additional</td>
<td>3.5</td>
</tr>
</tbody>
</table>
£3.4m has been allocated to the service in 2019/20 in recognition of the increased demand, the majority of this overspend is driven by the gap between what we pay out for temporary accommodation compared with what we can reclaim through the Housing Benefit Subsidy grant. This has been further exacerbated by an increase in activity in the last 6 months particularly in the number of non families in temporary accommodation. There are a number of mitigations in place to reduce the level of expenditure in this area, closely monitored by Strategic Housing Board.

<table>
<thead>
<tr>
<th>Customer Services &amp; Transformation</th>
<th>Other Variances Less than 100K</th>
<th>(0.1)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Customer Services &amp; Transformation</td>
<td></td>
<td>3.8</td>
</tr>
<tr>
<td>Human Resources</td>
<td>Workforce Transformation</td>
<td>The HR service continues to face challenges with external income from both schools and other contracts particularly within Employment Practice and Occupational Health.</td>
</tr>
<tr>
<td>Human Resources</td>
<td></td>
<td>0.2</td>
</tr>
<tr>
<td>Total Controllable Variances - People</td>
<td></td>
<td>9.9</td>
</tr>
<tr>
<td>Place Directorate</td>
<td>Place</td>
<td></td>
</tr>
<tr>
<td>Service Area</td>
<td>Reporting Area</td>
<td>Explanation</td>
</tr>
<tr>
<td>Place Directorate Management</td>
<td></td>
<td>0</td>
</tr>
<tr>
<td>Place Directorate Management</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Business &amp; Investment</td>
<td>Sports, Culture, Destination &amp; Bus Relationships</td>
<td>St Mary's trading position is in deficit due to income generating activity not making enough to fund fixed costs as a result of only 10 months expected trading activity to reflect the proposed capital works</td>
</tr>
<tr>
<td>City Centre &amp; Major Projects Development</td>
<td></td>
<td>0.1</td>
</tr>
<tr>
<td>Transportation &amp; Highways</td>
<td>Traffic</td>
<td>&quot;Bus gate and parking enforcement are projected to be c£0.6m lower than both budget and previous years as a result of both temporary bus gate closures and a lower activity trend generally. This is offset by a forecast increase in income from car parks of c£0.4m.&quot;</td>
</tr>
<tr>
<td>Department</td>
<td>Variances less than £100k</td>
<td>Amount</td>
</tr>
<tr>
<td>-----------------------------------------------------</td>
<td>--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------</td>
<td>--------</td>
</tr>
<tr>
<td>Transportation &amp; Highways</td>
<td>Additional income primarily in the building control service following increased activity, and also recovery of enforcement costs in environmental health.</td>
<td>0.1</td>
</tr>
<tr>
<td>Streetscene &amp; Regulatory Services</td>
<td>Additional income primarily in the building control service following increased activity, and also recovery of enforcement costs in environmental health.</td>
<td>0.3</td>
</tr>
<tr>
<td>Streetscene &amp; Regulatory Services</td>
<td>This is mainly related to a reduction in income for Bereavement Services due to falling death rates. Equipment issues have also resulted in Car Parking income pressures at Coombe, however upgraded pay machines and barriers have now been installed. There has also been urgent spend to upgrade city centre Streetpride mess room facilities</td>
<td>1.0</td>
</tr>
<tr>
<td>Streetscene &amp; Regulatory Services</td>
<td>&quot;Commercial Waste is forecasting a shortfall of £0.3m. This shortfall is due to increased gate fees &amp; tonnages. Domestic Waste is forecasting spend pressures of £0.5m. This is due to increased pool cover for sickness absence, additional bin purchases &amp; the cost of Christmas cover. Waste Disposal costs are also forecast to overspend by £0.3m. This is partly due to higher tonnages and partly higher gate fees/loss of rebate income for co-mingled recycling</td>
<td>1.0</td>
</tr>
<tr>
<td>Streetscene &amp; Regulatory Services</td>
<td>A mixture of overtime &amp; agency to cover long term sickness, higher costs due to increase in the number of vehicles &amp; shortfall against aspirational income targets.</td>
<td>0.2</td>
</tr>
<tr>
<td>Streetscene &amp; Regulatory Services</td>
<td>Overall a small net surplus is expected, however income is forecast to be down hence the variation. However, this is offset by reduced staffing costs</td>
<td>0.1</td>
</tr>
<tr>
<td>Project Management and Property Services</td>
<td>Vacant post and charges to Capital for Development surveyors time in respect of the property acquisition and disposal programmes</td>
<td>0.3</td>
</tr>
<tr>
<td>Project Management and Property Services</td>
<td>Primarily relates to a one-off Business Rates refund of £434k on operational buildings</td>
<td>0.6</td>
</tr>
<tr>
<td>Project Management and Property Services</td>
<td>There is a surplus as a result of an increase in housing benefit overpayment recovery. This is offset by additional costs required to</td>
<td>0.8</td>
</tr>
</tbody>
</table>
Finance & Corporate Services | Legal Services | "Primarily:  
- the cost of agency and external cover for vacant posts and the use of external counsel in Legal Services.  
- underlying cost pressures within coroners due to price and volume increases." | 0.4 |

Finance & Corporate Services | Democratic Services | A combination of one-off savings whilst restructures are implemented and additional income from school's appeal works. | (0.1) |

Finance & Corporate Services | | | (0.5) |

Total Non-Controllable Variances - Place | | | 1.0 |

Contingency & Central Budgets | | | |

<table>
<thead>
<tr>
<th>Service Area</th>
<th>Reporting Area</th>
<th>Explanation</th>
<th>£M</th>
</tr>
</thead>
<tbody>
<tr>
<td>Total Controllable Variances - Contingency &amp; Central Budgets</td>
<td></td>
<td>The large improvement since quarter 2 is due to £3.1m of employer pension contributions no longer due to be paid to the West Midlands Pension Fund. The Council has budgeted for a higher payroll and employer pension contributions than anticipated when fixed contributions were agreed with the Pension Fund 3 years ago. The Fund has confirmed that it is not expecting these amounts to be paid over to it and that it has taken account of this in calculating the Council's revised contributions for future years. Therefore, the over-budgeted sums can now be released to the Council's bottom line.</td>
<td>(10.0)</td>
</tr>
</tbody>
</table>

Net Asset Management Revenue Account expenditure is anticipated to be £2.4m less than budget because of lower costs of capital financing, higher investment income and higher loan income. Other corporate budgets reflect lower than budgeted pension costs linked to an early payment arrangement with the West Midlands Pension Fund (£2m); uncommitted resources related to one-off social care funding (£1m); Coventry and Warwickshire Business Rate Pool income in excess of budget (£1.1m); projected additional savings
from the Friargate Project (£0.75m); lower than budgeted levy costs (£0.6m); and a contribution to reserves for managing the costs of major projects approved at quarter 2.
## Appendix 2

### Approved / Technical Changes

<table>
<thead>
<tr>
<th>SCHEME</th>
<th>EXPLANATION</th>
<th>£m</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>PLACE DIRECTORATE</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Air Quality - Clean Bus Technology Fund</td>
<td>A further £2.517m of Clean Bus Technology Fund was awarded to CCC. This is the element to be spent this financial year with remainder profiled into 2020-21.</td>
<td>1.7</td>
</tr>
<tr>
<td>On-street Residential Charge-point Scheme Phase 2</td>
<td>Grant Award from Office for Low Emission Vehicles for On-street Residential Charge-points phase 2.</td>
<td>0.3</td>
</tr>
<tr>
<td>Better Street Community Project (Transforming Cities Fund)</td>
<td>TfWM award as part of the Transforming Cities Fund of £265k to support Walking and Cycling programme.</td>
<td>0.3</td>
</tr>
<tr>
<td>Coombe Abbey</td>
<td>New Play Provision agreed at Cabinet</td>
<td>0.8</td>
</tr>
<tr>
<td>City Centre Regeneration - City Centre South and Friargate</td>
<td>Revenue contribution for development costs for CCS not eligible for WMCA Grant, plus reprofile of Friargate Project management Budget from 20/21 to match spend</td>
<td>0.3</td>
</tr>
<tr>
<td>Acquisition of B&amp;M</td>
<td>Approved at Cabinet on 8th October 2019 to purchase this Investment Property</td>
<td>5.3</td>
</tr>
<tr>
<td>UKBIC</td>
<td>Additional Funding awarded</td>
<td>9.2</td>
</tr>
<tr>
<td>Acquisition Costs Temporary Accommodation (Homeless)</td>
<td>The change to the programme is to increase the budget as a result of additional property projects being progressed in year to alleviate the temporary accommodation revenue financial pressure. These have all had oversight from Strategic Housing Board and Cabinet Member and are in line with the original aims of the allocation.</td>
<td>0.2</td>
</tr>
<tr>
<td>City of Culture</td>
<td>Adjustment to correct the programme forecast at Qtr 2. This has no impact on resources</td>
<td>(4.0)</td>
</tr>
<tr>
<td><strong>SUB TOTAL - Place Directorate</strong></td>
<td></td>
<td>14.0</td>
</tr>
<tr>
<td><strong>TOTAL APPROVED / TECHNICAL CHANGES</strong></td>
<td></td>
<td>14.0</td>
</tr>
<tr>
<td>DIRECTORATE</td>
<td>ESTIMATED OUTTURN QTR 2 £m</td>
<td>APPROVED / TECHNICAL CHANGES £m</td>
</tr>
<tr>
<td>-------------</td>
<td>-----------------------------</td>
<td>---------------------------------</td>
</tr>
<tr>
<td>PEOPLE</td>
<td>12.3</td>
<td>0.0</td>
</tr>
<tr>
<td>PLACE</td>
<td>206.4</td>
<td>14.0</td>
</tr>
<tr>
<td>TOTAL</td>
<td>218.7</td>
<td>18.0</td>
</tr>
</tbody>
</table>
Rescheduling and Accelerated Spend

<table>
<thead>
<tr>
<th>SCHEME</th>
<th>EXPLANATION</th>
<th>£m</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>PEOPLE DIRECTORATE</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Basic Need</td>
<td>Works underway to expand secondary schools – three of the smaller projects have completed and the programme of works for larger secondary expansion projects to commence at the earliest February 2020, which means much of the expenditure will be seen next financial year.</td>
<td>(0.5)</td>
</tr>
<tr>
<td>SEND</td>
<td>Project completion within this financial year – two projects completed and two projects due to complete by February. We were awarded extra funding from the DFE to undertake further projects.</td>
<td>0.5</td>
</tr>
<tr>
<td><strong>SUB TOTAL - People Directorate</strong></td>
<td></td>
<td>0.0</td>
</tr>
<tr>
<td><strong>PLACE DIRECTORATE</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>City Centre Regeneration</td>
<td>Reprofiling of expenditure will continue whilst the scheme’s planning application is being developed</td>
<td>(0.3)</td>
</tr>
<tr>
<td>Friargate</td>
<td>Expenditure forecasts will continue to be estimates until development and building contracts are in place (anticipated to be Summer 2020).</td>
<td>(0.2)</td>
</tr>
<tr>
<td>Coventry Station Masterplan</td>
<td>The 2 bids received for Phase 3 (NUCKLE 1.2) of this project were significantly over budget, and even with an alternative proposal provided by Network rail this was also over budget. Currently options are being considered with the DFT/NR on how to take this scheme forward. This has caused delays in the programme, while further options to make this scheme affordable are considered. Phase 1/2 are still on track.</td>
<td>(0.9)</td>
</tr>
<tr>
<td>GD14 - A46 N-S Corridor (Stanks)</td>
<td>Delays to the project has meant that they have been unable to defray as much expenditure as originally forecasted. Delays are due to a number of uncharted utilities found on site and re-profiling the programme to encompass pedestrian management routes</td>
<td>(0.7)</td>
</tr>
<tr>
<td>GD36 - A452 Europa Way Corridor</td>
<td>Project has been subject to several delays which have impacted on the programme</td>
<td>(0.3)</td>
</tr>
<tr>
<td><strong>Vehicle &amp; Plant Replacement</strong></td>
<td>Vehicles have been delayed replacing in this financial year, mainly due to a proposed bid for additional grant funding. If this bid was successful, we would likely replace many of these vehicles with electric cars and vans, using capital grant fund instead. We will know if February whether we are successful in the bid, whereby we order the new vehicles that will be paid for in 20/21</td>
<td>(0.5)</td>
</tr>
<tr>
<td><strong>ESIF - Business Support Phase 2</strong></td>
<td>We had forecast that we would give out £1.7m in grants by the end of the financial year as we had approved a significant amount in grant approvals. However, due to Brexit and some issues with Building purchases, some of our businesses have delayed their expenditure so we have been reconsidered our forecast. Our Business Support Programme is running to December 2021 therefore we still have a considerable amount of time for this expenditure to take place and we are confident that it will take place in full</td>
<td>(0.3)</td>
</tr>
<tr>
<td><strong>ESIF - Low Carbon</strong></td>
<td>Down to commitment and spend from SMEs.</td>
<td>(0.1)</td>
</tr>
<tr>
<td><strong>London Road Cemetery</strong></td>
<td>There was delay in appointing the project manager for the London Road Cemetery project. This then resulted in the projects start on site date. Hence the underspend on the project. The project is now due to be on site early March and has a completion date of early November</td>
<td>(0.8)</td>
</tr>
<tr>
<td><strong>Growing Places</strong></td>
<td>Delays with contracting; signing of legal documentation and purdah due to the recent elections has meant that projects have not been able spend to forecast.</td>
<td>(0.3)</td>
</tr>
<tr>
<td><strong>City Centre Destination Leisure Facility</strong></td>
<td>The project has had a £100k additional costs due to an agreed extension of time for the contractor</td>
<td>0.1</td>
</tr>
<tr>
<td><strong>Superfast Broadband</strong></td>
<td>The re-scheduling is as a result of agreeing a payment profile with City Fibre as part of the Cabinet report which was approved in April with regards to the network lease extension and expansion. £300k is required to be paid in future years, hence the rescheduling.</td>
<td>(0.3)</td>
</tr>
<tr>
<td><strong>Housing Venture</strong></td>
<td>The underspend is due to Whitefriars Housing claiming an alternative external grant towards the Garage/infill project, and as they can't drawdown 2 Grants at the same time, they are using the external grant first before using the S106 and receipts money that the Council is holding.</td>
<td>(0.3)</td>
</tr>
<tr>
<td><strong>MRF Development Costs</strong></td>
<td>The development costs are anticipated to come it at around £2.8M, of which £800k has already been spent to date developing the feasibility and detailing business case and financial model. The capital works order was set up to cover costs associated with procurement phase which commenced at the end of September. It is anticipated that this phase of works will take around 12-15 months, with financial close anticipated early 2021. The updated forecast reflects anticipated spend against proposal received by the supporting advisory team, and appointment of internal secondments.</td>
<td>(0.7)</td>
</tr>
<tr>
<td><strong>Lentons Lane Cemetery - Phase 2</strong></td>
<td>At quarter 2, the project was in a state of flux due to proposed changes in the scope of works and the subsequent impact on the budget. It was agreed to reschedule at quarter three, once the scope had been agreed and the programme was better understood. As at quarter 3, the project has slipped by three</td>
<td>(1.5)</td>
</tr>
</tbody>
</table>
months due to the debate about the scope of works and one month due to issues with preparing the tender documents. The delay of four months in total means that the majority of the contractor spend will now fall into financial year 2020/21.

| Whitley South | The variation is due to the project team being in a position to further firm up the expenditure profile based on an updated contractor programme and cashflow. This is due to the technical and planning issues having been resolved providing a more robust programme of work | (1.3) |
| Loop Line | The request from Historic Coventry Trust is to defer the drawdown of this loan facility until the second quarter of 20/21 | (0.2) |
| Miscellaneous under £100k | | 0.1 |
| **SUB TOTAL - Place Directorate** | | **(16.6)** |
| **TOTAL RESCHEDULING** | | **(16.6)** |
## Appendix 5

### Prudential Indicators

<table>
<thead>
<tr>
<th>Indicator</th>
<th>per Treasury Management Strategy</th>
<th>As at 31st December 2019</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Ratio of Financing Costs to Net Revenue Stream (Indicator 1)</strong>, illustrating the affordability of costs such as interest charges to the overall City Council bottom line resource (the amount to be met from government grant and local taxpayers).</td>
<td>13.40%</td>
<td>13.05%</td>
</tr>
<tr>
<td><strong>Gross Borrowing should not, except in the short term, exceed the estimated Capital Financing Requirement (CFR) at the end of 3 years (Indicator 2)</strong>, illustrating that, over the medium term, net borrowing (borrowing less investments) will only be for capital purposes. The CFR is defined as the Council’s underlying need to borrow, after taking account of other resources available to fund the capital programme.</td>
<td>Year 3 estimate / limit of £472.7m</td>
<td>£321.3m Gross borrowing within the limit.</td>
</tr>
<tr>
<td><strong>Authorised Limit for External Debt (Indicator 5)</strong>, representing the &quot;outer&quot; boundary of the local authority's borrowing. Borrowing at the level of the authorised limit might be affordable in the short term, but would not be in the longer term. It is the forecast maximum borrowing need with some headroom for unexpected movements. This is a statutory limit.</td>
<td>£487.6m</td>
<td>£321.3m is less than the authorised limit.</td>
</tr>
<tr>
<td><strong>Operational Boundary for External Debt (Indicator 6)</strong>, representing an &quot;early&quot; warning system that the Authorised Limit is being approached. It is not in itself a limit, and actual borrowing could vary around this boundary for short times during the year. It should act as an indicator to ensure the authorised limit is not breached.</td>
<td>£467.6m</td>
<td>£321.3m is less than the operational boundary.</td>
</tr>
<tr>
<td><strong>Upper Limit on Fixed Rate Interest Rate Exposures (Indicator 9)</strong>, highlighting interest rate exposure risk. The purpose of this indicator is to contain the activity of the treasury function within certain limits, thereby reducing the risk or likelihood of an adverse movement in interest rates or borrowing decisions impacting negatively on the Council’s overall financial position.</td>
<td>£422.4m</td>
<td>£249.7m</td>
</tr>
<tr>
<td><strong>Upper Limit on Variable Rate Interest Rate Exposures (Indicator 9)</strong>, as above highlighting interest rate exposure risk.</td>
<td>£84.5m</td>
<td>-£43.7m</td>
</tr>
<tr>
<td><strong>Maturity Structure Limits (Indicator 10)</strong>, highlighting the risk arising from the requirement to refinance debt as loans mature:</td>
<td></td>
<td></td>
</tr>
<tr>
<td>&lt; 12 months</td>
<td>0% to 40%</td>
<td>25%</td>
</tr>
<tr>
<td>12 months – 24 months</td>
<td>0% to 20%</td>
<td>2%</td>
</tr>
<tr>
<td>24 months – 5 years</td>
<td>0% to 30%</td>
<td>5%</td>
</tr>
<tr>
<td>5 years – 10 years</td>
<td>0% to 30%</td>
<td>6%</td>
</tr>
<tr>
<td>10 years +</td>
<td>40% to 100%</td>
<td>63%</td>
</tr>
</tbody>
</table>
Investments Longer than 364 Days (Indicator 11), highlighting the risk that the authority faces from having investments tied up for this duration.

<table>
<thead>
<tr>
<th></th>
<th>£30m</th>
<th>£0.0m</th>
</tr>
</thead>
</table>

Executive Summary:

This report describes the Council’s review of the social housing Allocations Policy and recommends changes to enable the city to best meet housing need within a backdrop of reduced turnover of Registered Provider (RP) stock. Coventry Homefinder is the Choice Based Letting system by which the majority of social housing in Coventry is allocated.

The Council committed to reviewing the Policy within the City’s Housing and Homelessness Strategy 2019-2024. The revised Housing Allocations Policy is a key tool to support the delivery of the Housing and Homelessness Strategy. The last review of the Coventry Homefinder Policy was undertaken in 2014, with minor amendments in 2018 as a result of the Homelessness Reduction Act 2017.

The Council no longer owns any housing following the Large-Scale Voluntary Transfer of all the former Council housing to Whitefriars Housing Group (now Citizen) in September 2000. However, the Local Authority is legally required to have a scheme that allocates social housing. The aim is that those with the greatest need for housing are prioritised.

This report provides the context and evidence as to why the Allocations Policy needs to be reviewed, looking at how the turnover of social housing has reduced within a backdrop of increasing demand for affordable housing in the City. The fundamental review undertaken (June 2019 to October 2019) has resulted in a new allocations scheme being developed and consulted upon. The key changes include:

- Changing how people apply for housing.
- Changing who can apply for housing (qualification criteria).
- Changing the Banding System (reasonable preference criteria) including the introduction of a reduced preference band.
- Reducing the number of refused offers allowed under the Policy.
- Changing how adapted properties are advertised and allocated.


**Recommendations:**

The Cabinet is requested to:

1) Note that Communities and Neighbourhoods Scrutiny Board (4) noted, welcomed and were supportive of the proposed changes to the Coventry Homefinder Policy and the consultation being undertaken.

2) Consider the equality and consultation analysis and consultation responses received regarding proposals to change the Coventry Homefinder Policy (Housing Allocations Policy) and the summary report provided at Appendices B and C to the report.

3) Approve a revised Coventry Homefinder Policy, attached as Appendix A to the report, with effect from Autumn 2020.

**List of Appendices included:**

Appendix A – Draft Coventry Homefinder Policy 2020
Appendix B – Consultation Statement
Appendix C – Equality and Consultation Analysis - ECA (parts 1 and 2)
Appendix D – Current and proposed banding system

**Background papers:**

None

**Other useful documents:**

- Coventry Homefinder Choice Based Lettings Policy 2014
- Implementation of the Homelessness Reduction Act 2017 (Coventry Homefinder Policy 2018 – Appendix C)
- Coventry’s Housing and Homelessness Strategy 2019-2024

**Has it been or will it be considered by Scrutiny?**

No – however, an item on this matter was considered by the Communities and Neighbourhoods Scrutiny Board (4) on 14th November 2019.
Has it been or will it be considered by any other Council Committee, Advisory Panel or other body?

No – however, a presentation on this matter was considered by Disability Equality Action Partnership (DEAP) on 7th November 2019.

Will this report go to Council?

No
Report title:
Coventry Homefinder Review (Social Housing Allocations Policy)

1. Context (or background)

1.1 Coventry’s current Housing Allocations Policy (Coventry Homefinder Policy) was introduced in 2014. There were minor amendments made in 2018 due to the Homelessness Reduction Act 2017, but the Policy has fundamentally remained the same for the last 6 years.

1.2 The Council no longer owns any housing following the Large Scale Voluntary Transfer of the former Council housing to Citizen (formerly Whitefriars Housing Group) in September 2000. The Local Authority is still required to have an allocation scheme for determining how allocations are made in order that those who have the greatest need for housing are prioritised. Coventry Homefinder is therefore a partnership between Coventry City Council and Registered Providers of social housing (mostly Housing Associations).

1.3 Coventry Homefinder is a Choice Based Lettings Allocation Scheme. People who want to move into a social rented home in Coventry can register with Coventry Homefinder. A banding system is used to give priority to those people with an urgent housing need (e.g. those people who are homeless, are overcrowded or who have a medical or welfare need to move) over those people who have no identified housing need and/or are currently adequately housed.

1.4 Available social housing properties are advertised each week and applicants can express an interest in (bid on) properties that they want to be considered for. At the end of each advertising period, a shortlist is created of all the applicants that have bid on the property, based on their band and their registration/effective date.

1.5 On 9th January 2020, there were 13,706 applicants registered on Coventry Homefinder. Of these 3130 applicants had been assessed as having a housing need and placed in the priority bands 1A to 2C (22.8% of the register).

1.6 Being registered on Coventry Homefinder does not guarantee that the applicant will be housed. In 2018/19 only 1400 properties were advertised on Coventry Homefinder, of which 13% were aged restricted properties. Only 196 properties (14% of lettings) in 2018/19 were for family sized homes (3 and 4 bedroom properties).

1.7 The Coventry housing landscape has changed significantly since 2014. There has been a substantial rise in homelessness and a significant increase in the number of households living in temporary accommodation.

1.8 The turnover of social rented properties available to let has reduced whilst demand for social housing has increased. This table shows the increase in demand and the reduction in lettings over the last 6 years:

<table>
<thead>
<tr>
<th>Year</th>
<th>Total number on Register (snapshot)</th>
<th>Total in Reasonable Preference (snapshot)</th>
<th>Number of Lettings (over the year)</th>
</tr>
</thead>
<tbody>
<tr>
<td>2013/14</td>
<td>14,272</td>
<td>1817</td>
<td>2211</td>
</tr>
<tr>
<td>2014/15</td>
<td>13,773</td>
<td>1616</td>
<td>2254</td>
</tr>
<tr>
<td>2015/16</td>
<td>13,794</td>
<td>1628</td>
<td>1768</td>
</tr>
<tr>
<td>2016/17</td>
<td>14,223</td>
<td>1927</td>
<td>1637</td>
</tr>
</tbody>
</table>
1.9 This report describes the process of consultation with Registered Providers to develop a range of proposals for change and how the proposals were consulted upon with both voluntary sector organisations and the wider public.

1.10 The review of the Coventry Homefinder Policy began in June 2019. In total five workshops were held with Registered Providers, one was held after the end of the consultation period. Six of the 10 Registered Providers who allocate housing via Coventry Homefinder attended at least one workshop. The Registered Providers who attended workshops collectively let 98% of properties advertised on Coventry Homefinder in 2018/19. The first four workshops enabled the Council to jointly develop a set of proposals for change.

1.11 Members of the public were invited to give their feedback on the current policy via the Council’s new engagement platform called ‘Let’s Talk Coventry’ in order to inform the review as it progressed. Prior to the launch of the consultation survey, the site received 699 visits with 63 participants either answering a quick poll or asked a question on the question and answer tool. Voluntary sector agencies who are members of the City’s Homelessness Forum and/or the Frontline Network gave feedback on emerging definitions which would underpin a revised policy.

1.12 An 8-week public consultation survey was launched between 11th November 2019 and 3rd January 2020 with the aim of outlining the proposals for change to a wider audience. The survey also provided all Registered Providers with the opportunity to provide their statutory response to the consultation, as set out in the Housing Act 1996.

1.13 This report details the outcome of this consultation.

1.14 Emerging messages from consultation activities

1.14.1 There are a number of emerging themes from the consultation activities that are not specific to individual proposals but provide details of how the wider public, voluntary sector organisations and Registered Providers view housing as a key issue facing people who live in Coventry. These are outlined below:

- Support for undertaking the review of the policy in order to prioritise people in greatest need for housing and to make the allocations scheme simpler and more transparent.

- Registered Providers were keen for a review to be undertaken and to ensure it could enable them to let available properties as quickly as possible.

- More affordable housing options are needed in the City. Respondents to the survey highlighted their difficulties in accessing accommodation in the Private Rented Sector, particularly those on benefits or low incomes. Long term affordability of renting in the Private Rented Sector is given as a key reason for registering on Coventry Homefinder.

- The belief that local people with the strongest local connection to Coventry should be prioritised for social housing.
• The need to improve the information available about individual properties on the Coventry Homefinder Website to support applicants to make informed choices about meeting their housing needs – this was specifically linked to feedback on the proposed reduced preference band and the proposed reduction in the number of refused offers.

• Many respondents to the consultation survey gave examples of their personal circumstances in relation to their current housing situation and/or their health and wellbeing difficulties and how their housing need impacted their health.

2. Options considered and recommended proposal

2.1 **Option 1 – No nothing.** This is not the recommended option. This would involve the Council and our Registered Providers retaining the current Coventry Homefinder Policy.

2.2 The current policy is no longer considered fit for purpose in the context of continued demand for social housing against a back drop of rising numbers of applicants to the register with a priority need for housing; coupled with a reduction in the numbers of properties advertised and allocated via Coventry Homefinder. The Council committed to review the Housing Allocations Policy within the City’s Housing and Homelessness Strategy 2019-2024.

2.3 **Option 2 – Implement the pre-consultation proposals.** This is not the recommended option. This option involves implementing the original proposals outlined in this report. This would not take account of the feedback received from the wider public, Registered Providers and voluntary sector to recent consultation survey.

2.4 **Option 3 – Request further amendments to the current draft of the policy and/or further consultation.** This is not the recommended option. Over the last nine months the Council and our Registered Providers have completed a fundamental review of the current Policy, considering all aspects of possible change allowed within the current legislation. The general public and wider organisational responses from voluntary sector organisations have been generally supportive of the changes and a further period of review and/or consultation is unlikely to result in new proposals.

2.5 A further consultation period on new and/or revised proposals would delay the implementation of the Policy which is already subject to a lengthy implementation period due to the level of potential reassessments (c12,000) of current Homefinder applicants to determine whether they still qualify for the register and the level of their housing need to determine their new banding if the proposed changes were approved. In addition, the Housing and Homelessness Service is currently in the process of procuring a new IT system for the service which includes a housing allocations module. This could also mean all applicants will be required to re-register for housing.

2.6 There would be scope to make minor technical amendments to the wording of the draft policy to provide additional clarity that do not change the key aspects of the Allocations Scheme consulted upon. The revised policy may require some technical amendment (how you register for housing, keep your housing application up to date, how you bid for properties and how you are notified of the outcome of those bids) following the outcome of the IT tender.

2.7 **Option 4 – is to approve the post consultation proposals for change to the Coventry Homefinder Policy and approve a revised Coventry Homefinder Policy.** This is the recommended proposal. The revised proposals for change as detailed in section 3.7 of this report and the draft policy in appendix A takes account of the recent consultation feedback.
2.8 The consultation analysis for each individual proposal is contained within Consultation Statement – Appendix B along with the Equality Consultation Analysis in appendix C. Cabinet is required to read all of this material when making their decision. The summaries below do not provide a comprehensive treatment of all of the issues raised during the consultation but highlight those considered to be most significant.

2.9 Consideration has been given to the consultation feedback and equality analysis to inform a view on whether the existing proposals should proceed as originally described, be varied in light of consultation feedback and impacts or withdrawn. The following sections summarise this for each proposal with full information included in the appendices.

2.10 Proposals for change – Definitions

2.10.1 As part of the development of a revised Coventry Homefinder Policy three definitions were developed to underpin the principles of new policy and/or to support the administration of the new policy. These definitions were adequately housed (no identified housing need), low housing need and tenancy readiness.

2.10.2 A key change to the current policy is that it is recommended to introduce a qualification criterion that to join the register, households must have an identified housing need. Under the current policy it is not a requirement to have an identified housing need. The definition of adequately housed supports the identification of housing need.

2.10.3 The definition consulted upon was `adequately housed` which is defined as: Applicants who are already housed in accommodation that meets their needs, both in terms of size, property type, property condition, location and affordability.

2.10.4 The Council and Registered Providers wanted to ensure that, as part of the policy review, there was a wide ranging definition of housing need to ensure that those people with less urgent or emerging housing needs were still able to register for social housing. Therefore, a low housing need definition was developed to provide some of the reasons for which an applicant could be assessed as having a low housing need.

2.10.5 The low housing need definition consulted upon was as follows:

- Newly forming households – applicants living with friends or family wanting their own accommodation.
- Newly forming households – applicants currently living apart who want to live together.
- Applicants who are or could potentially experience financial difficulty if they remained in their current accommodation and therefore need to move to more affordable accommodation in the medium to long term.

2.10.6 The third and final definition was to define tenancy readiness. All social housing tenants are required to demonstrate to a Registered Provider they are able to maintain a tenancy. The definition of tenancy readiness underpins the revised policy as it supports the application and administration of the proposed new banding system (further details in paragraph 2.15 of this report). In policy terms the definition of tenancy readiness would only apply to Coventry Care Leavers and people currently living in supported accommodation (e.g. hostels or refuges).
2.10.7 As part of their feedback on the current policy Registered Providers raised concerns that some care leavers and some people living in supported accommodation were receiving offers of housing before they were ready which had led to examples of potentially avoidable tenancy breakdown.

2.10.8 The tenancy readiness definition consulted upon was as follows.

The applicant:
- Understands their responsibilities as a tenant to adhere to their tenancy agreement.
- Has the financial resources to pay the rent and other household bills.
- Is able to access and engage with formal (professional support) or informal support (family or friends) where this is required.

2.11 Proposals for change - how people apply for housing

2.11.1 Under the proposals consulted upon, there were four proposed changes to how people apply for housing. These were:

- To have one application process with one form.
- For applicants to only have one live housing application.
- Changing the bidding cycle to enable properties to be advertised on any day. Applicants would have seven calendar days to place bids. The applicant bidding cycle would run Monday to Sunday.
- Reducing the time that applicants have to renew their housing application to 28 days.

2.11.2 The first proposal was to replace the current two-stage application process, whereby applicants complete one form to apply for housing and a second form to apply for priority banding (current bands 1A to 2C), with one form which assesses housing need at point of application.

2.11.3 Under the current policy, applicants can be registered on multiple applications. Under the proposals consulted upon this would no longer be allowed due to the need to assess the housing need of each household as part of the proposed qualification criteria. Further details of proposed changes to the qualification criteria are located in paragraph 2.12 of this report.

2.11.4 As part of the consultation with Registered Providers they requested the ability to advertise their properties more quickly via any day advertising. Under the current policy there is a static bidding cycle from midnight (00.00am) on Thursday morning to 11.59pm on the following Tuesday night, each week.

2.11.5 All households registered on Coventry Homefinder are required to complete an annual review of their housing application. They currently have 125 days to complete it. The proposal consulted upon was to change this to 28 days.

2.12 Proposals for change – who can apply for housing (qualification criteria)

2.12.1 Housing Authorities (Local Authorities) can specify local qualification rules. Applicants cannot join the housing register if they do not meet the qualification rules. The proposed changes to the qualification rules are:
• To change the qualification criteria so that only households with an assessed housing need and local connection to Coventry can apply. This means if a household is ‘adequately housed’ they will no longer be able to register on Coventry Homefinder.

• To continue to allow applications from people with a housing need but no local connection to Coventry but only in exceptional circumstances.

• To reject applications from households with no housing need and no local connection to Coventry.

• To add an asset/income cap to the qualification criteria.

2.12.2 Under the current policy anyone with or without a housing need can register for housing. Applicants with no identified housing need are currently placed in band 3A or 3B depending on their local connection to Coventry.

2.12.3 Applicants with no local connection to Coventry are able to register for housing. Those with a housing need but no local connection are currently placed in band 3A with applicants with a local connection to Coventry but no identified housing need. Applicants with no local connection and no housing need are currently placed in the lowest band which is 3B.

2.12.4 The current policy does not have any criterion relating to income or assets. In the proposed policy the income and/or asset cap was set at £50,000 for either income per year or other assets.

2.12.5 Changing the qualification criteria will result in all current applicants having to re-apply to the register. A significant number of these households will require an assessment of their current housing circumstances, approximately 12,000 households. Applicants with no current housing need will need to be re-assessed to determine whether they qualify under the new criteria and some applicants with an identified housing need will need to be re-assessed to determine a new banding, as a result of proposals to change the banding system. An applicant who is assessed as not meeting the revised qualification criteria will have a right to request a review of the decision made.

2.13 Proposals for change – reducing the number of refused offers of housing

2.13.1 The current policy allows applicants to refuse up to five offers of housing before their application is suspended. The proposal consulted upon was to reduce the number of refused offers allowed to three.

2.13.2 When an applicant refuses an offer of accommodation it increases the time that social rented homes are left vacant and delays another household being allocated the home at a time when social housing is in great demand. Registered Providers also incur costs when homes are left vacant.

2.13.3 Under the current policy applicants are notified that their application is suspended and are given 28 days to demonstrate the refusals of housing were reasonable in order for their application to be re-opened. Under the proposals consulted upon, refusing the maximum offers of suitable housing is a reason that an applicant could be placed in the proposed reduced preference band, as explained in paragraph 2.16 of this report.
2.14 Proposals for change – adapted properties

2.14.1 Adapted properties are currently allocated via a separate list and not advertised on the Coventry Homefinder Website. When an adapted property becomes available the Registered Providers work through the adapted property list to find a suitable tenant. The adapted property list is rarely updated, and this means it is becoming increasingly difficult to match applicants requiring adapted properties. This has resulted, on some occasions, in Registered Providers removing adaptions in order to let the property as general needs housing.

2.14.2 The proposal consulted upon, was to advertise and allocate adapted properties via the Coventry Homefinder Website, to enable applicants who require an adapted property to see which properties become available and express an interest in the property. An Occupational Therapist based within the Housing and Homelessness Service (a newly created post) will then work alongside the Registered Providers to ensure that each property is allocated by ‘best fit’ to the needs of the applicant. This may mean that offers made are not prioritised in order of priority band or effective date. In the event that two applicants bid for the priority with similar needs, the property will be allocated by priority band and/or effective date of applicants requiring adaptions in the first instance. If no bids are received from applicants who require adaptions, applicants who bid on the property but do not require adaptions will have the opportunity to view the property as general needs housing. The demand for adapted properties is high and it is expected that the majority; if not all adapted properties will be let to those requiring adaptions.

2.14.3 Applicants requiring adaptions can also continue to bid on general needs housing they believe could be adapted to meet their needs. The Occupational Therapist will support the applicant and the Registered Provider to decide if the property can be adapted and where required support them to source appropriate funding via adult social care (e.g. Disabled Facilities Grant).

2.15 Proposals for change – changing the banding system (‘reasonable preference criteria’)

2.15.1 The Housing Act 1996 provides the legislative guidance to whom Housing Authorities must give ‘reasonable preference’ under their Housing Allocation Schemes over other groups of applicants. Housing Authorities also have the flexibility to give ‘reasonable preference’ to other groups of people to support their local priorities.

2.15.2 The Housing Authority is also required to give ‘additional preference’ to applicants who are currently serving or have served within the Armed Forces.

2.15.3 The current banding system, adopted in 2014, has seven bands (1A, 1B, 2A, 2B, 2C, 3A and 3B). Bands 1A to 2C include those applicants to whom we must give reasonable preference.

2.15.4 The purpose of the banding system is to inform applicants how priority for housing is awarded. Feedback from applicants and voluntary sector organisations prior to and during the review, told us that the current banding system was too complicated and difficult to understand.

2.15.5 A key aspect of the review was to work with the Registered Providers to develop a revised banding system for consultation. Any revision to how priority for housing is awarded is a complex task with competing priorities. The key aim was to make any proposed banding system simpler and easier to understand to current and future
applicants whilst reflecting the current housing pressures and wider priorities for the City and meeting the legislative requirements.

2.15.6 The current and proposed banding systems are detailed in Appendix D. The proposed banding system consulted upon had five bands. This included bands 1 to 4 and a reduced preference band. The main changes include:

- Reducing the number of categories from 28 to 23, by combining some categories into the Urgent social and welfare category or removing some categories (such as removing priority due to reviews of applicants in higher bands and a joint category of urgent medical need and living in overcrowded conditions).
- The introduction of a low housing need band.
- The introduction of a reduced preference band. (This is explained in more detail in paragraph 2.16).
- The introduction of ‘tenancy readiness’ criteria for Coventry Care Leavers and those applicants currently living in supported accommodation.
- Separating the homelessness prevention and homeless relief priorities, giving increased priority to applicants owed a duty under the relief stage of the Homelessness Reduction Act 2017.
- Increased priority for Coventry Care Leavers who are tenancy ready.
- Increased priority for applicants who are approved fosterers or adopters who require more appropriate accommodation in order to foster or adopt.
- New criteria to support families who are being reunited following children being returned from the care of the Local Authority.
- Reducing the number of categories for housing need due to medical reasons from 3 to 2. The new categories include criteria relating to both physical and mental health and needs arising from social care needs.

2.15.7 Nearly all the current priority need categories that have been retained have been given equivalent priority in the new banding system. The exception to this is applicants who have priority for being overcrowded by 2+ bedrooms, who are currently placed in 1A but would move to proposed band 2 under the new banding system.

2.15.8 There is an increasing shortage of family homes (3 and 4 bedrooms) becoming available for social rent via Coventry Homefinder. Approximately 55% of the applicants who are overcrowded and requiring an additional 2+ bedrooms need either a 4, 5 or 6 bedroom property. These sized properties are in very short supply and once allocated to families they tend to remain in the property for long periods of time. In addition, the Local Authority is currently providing temporary accommodation to a number of large families at considerable cost to the Council.

2.16 Proposals for change – changing the banding system – the reduced preference band

2.16.1 During the development of the proposals for consultation. Registered Providers attending the workshops clearly indicated they felt a reduced preference band was required in any revised banding system. Under the current policy, shortlisted applicants can be ‘skipped’ by the Registered Providers for a variety of reasons. This means the shortlisting process for individual properties can be time consuming when their priority is to let their properties quickly.

2.16.2 The issue of ‘skipping’ is a long-standing issue that all parties agreed needed to be resolved. Prior to the inclusion of the reduced preference band in the proposed banding system, Council Officers reviewed current operational practice and skipping data to inform any future proposals. It was clear that many applicants were being skipped on multiple occasions due to unresolved issues (e.g. current or former rent arrears or
concerns relating to anti-social behaviour) and this was a barrier to them being offered a property at a late stage in the housing allocation process. Registered Providers currently have the responsibility to notify applicants they have been skipped.

2.16.3 Under the proposals consulted upon there are 4 reasons why an applicant could be placed in the reduced preference band. These are:

- Reduced priority status due to unacceptable behaviour or rent arrears.
- Households where main housing duty has ended due to refusal of accommodation.
- Households who have refused 3 offers of accommodation.
- Households in Bands 1 and 2 who have not actively bid for suitable accommodation.

2.16.4 The reduced preference band is designed to be a temporary banding. The final decision to place an applicant in reduced preference will be made by the Coventry Homefinder Team on review of information provided by either the Registered Provider(s) or the applicant themselves. Any applicant placed in the reduced preference band will be given clear information and advice as to the action required to return to their identified housing need band. Where required applicants would be signposted to local advice agencies. This new arrangement will be an improvement on current operational practice.

3. Results of consultation undertaken

3.1 The proposals consulted upon were developed in partnership with Registered Providers as outlined in section 1.9 and 1.10 of this report. A key element of the 8-week consultation survey undertaken between 11 November 2019 and 3 January 2020 was to provide the opportunity for wider feedback on the proposals and the revised Homefinder Policy from applicants currently registered on Coventry Homefinder, the general public and voluntary sector organisations.

3.2 In total 486 consultation responses were received, of which 77% (374 responses) indicated they were currently registered on Coventry Homefinder. Seven responses were an organisational response from a Registered Providers, one of whom doesn’t let properties through Coventry Homefinder. 12 responses were received form voluntary sector agencies or other organisations. The consultation was undertaken through the following channels and methods:

- An automated message was issued via the Coventry Homefinder system to alert all applicants with an active application about the consultation – signposting them to the Let’s Talk site. This message was read by 3,892 applicants

- Information about the consultation was published on both the Council website and on the front page of the Coventry Homefinder website. During the consultation period 3,892 people logged into their account.

- The Let’s Talk Engagement platform attracted 2,800 visits to the Coventry Homefinder page during the consultation period. Using the platform allowed us to effectively engage with the public and provided a space where people could contribute their thoughts and ideas as well as provide specific feedback to each element of the proposed changes.

- The consultation approach recognised that certain groups of applicants may not regularly log in to their account to see the automated message during the consultation period. These included people registered on the adapted properties list, people who the Homefinder team assist to bid and people who receive the weekly property list via post. This groups received a copy of the consultation information pack and paper survey with
a return envelope. In addition, where email addresses were held, applicants on Homefinder who had been accepted as homeless were contacted separately to advise them of the consultation survey.

- Information about the consultation was displayed in all Council run libraries and paper surveys were available with post boxes for the survey to be submitted.
- In total 31 paper survey responses were received and input into Let’s talk.
- Engagement with the Coventry Homelessness Forum and Frontline Network
- Via Social Media (Facebook and Twitter)
- Internal communications to Council Staff

3.3 The key generic themes of the consultation process are outlined in section 1.13 of this report. Proposal specific feedback was generally positive from both the general public and Registered Providers and Voluntary Sector organisations. The strength of opinion for each proposal from the general public response is outlined below:

<table>
<thead>
<tr>
<th>Proposal – General public opinion</th>
<th>Strongly Agree</th>
<th>Agree</th>
<th>Neither agree or disagree</th>
<th>Disagree</th>
<th>Strongly Disagree</th>
<th>Don't know</th>
</tr>
</thead>
<tbody>
<tr>
<td>Qualification Criteria (449 responses)</td>
<td>17.4%</td>
<td>36.5%</td>
<td>12%</td>
<td>15.6%</td>
<td>15.6%</td>
<td>2.9%</td>
</tr>
<tr>
<td>Definitions (450 responses)</td>
<td>10.9%</td>
<td>38.4%</td>
<td>18%</td>
<td>13.6%</td>
<td>12.2%</td>
<td>6.9%</td>
</tr>
<tr>
<td>How you apply for housing (450 responses)</td>
<td>39.8%</td>
<td>43.3%</td>
<td>9.3%</td>
<td>2.9%</td>
<td>1.8%</td>
<td>2.9%</td>
</tr>
<tr>
<td>Bidding Cycle (446 responses)</td>
<td>29.8%</td>
<td>44.6%</td>
<td>13.5%</td>
<td>5.4%</td>
<td>5.2%</td>
<td>1.6%</td>
</tr>
<tr>
<td>Annual review process (450 responses)</td>
<td>24.2%</td>
<td>34.4%</td>
<td>18.2%</td>
<td>10.9%</td>
<td>8%</td>
<td>4.2%</td>
</tr>
<tr>
<td>Reduction in the number of refused (448 responses)</td>
<td>30.4%</td>
<td>36.6%</td>
<td>10.7%</td>
<td>10.7%</td>
<td>10%</td>
<td>1.6%</td>
</tr>
<tr>
<td>Adapted properties (451 responses)</td>
<td>36.1%</td>
<td>43.7%</td>
<td>11.5%</td>
<td>3.3%</td>
<td>1.1%</td>
<td>4.2%</td>
</tr>
<tr>
<td>Reduction in number of bands (448 responses)</td>
<td>17.2%</td>
<td>43.8%</td>
<td>17.2%</td>
<td>9.6%</td>
<td>7.8%</td>
<td>4.5%</td>
</tr>
<tr>
<td>Reduced Preference Band (447 responses)</td>
<td>19.9%</td>
<td>42.1%</td>
<td>18.6%</td>
<td>9.4%</td>
<td>6%</td>
<td>4%</td>
</tr>
</tbody>
</table>
3.4 The strongest areas of disagreement for the general public related to the proposed changes to the qualification criteria, specifically the proposed asset and income cap and the proposed definitions of ‘adequately housed’ and ‘low housing need’. Full details of all the consultation responses are contained in the consultation statement in Appendix B.

3.5 The strength of opinion for each proposal from the Registered Providers and Voluntary Sector responses is outlined below:

<table>
<thead>
<tr>
<th>Proposal – Registered Provider and Voluntary Sector Organisations*</th>
<th>Strongly Agree</th>
<th>Agree</th>
<th>Neither agree or disagree</th>
<th>Disagree</th>
<th>Strongly Disagree</th>
<th>Don't know</th>
</tr>
</thead>
<tbody>
<tr>
<td>Qualification Criteria (19 responses)</td>
<td>10.5%</td>
<td>57.9%</td>
<td>15.8%</td>
<td>5.3%</td>
<td>10.5%</td>
<td>0%</td>
</tr>
<tr>
<td>Definitions (19 responses)</td>
<td>26.3%</td>
<td>47.4%</td>
<td>10.5%</td>
<td>10.5%</td>
<td>5.3%</td>
<td>0%</td>
</tr>
<tr>
<td>How you apply for housing (19 responses)</td>
<td>57.9%</td>
<td>31.6%</td>
<td>5.3%</td>
<td>0%</td>
<td>5.3%</td>
<td>0%</td>
</tr>
<tr>
<td>Bidding Cycle (19 responses)</td>
<td>47.4%</td>
<td>26.3%</td>
<td>10.5%</td>
<td>10.5%</td>
<td>5.3%</td>
<td>0%</td>
</tr>
<tr>
<td>Annual review process (19 responses)</td>
<td>26.3%</td>
<td>31.6%</td>
<td>5.3%</td>
<td>21.1%</td>
<td>15.8%</td>
<td>0%</td>
</tr>
<tr>
<td>Reduction in the number of refused (19 responses)</td>
<td>31.6%</td>
<td>36.8%</td>
<td>10.5%</td>
<td>10.5%</td>
<td>10.5%</td>
<td>0%</td>
</tr>
<tr>
<td>Adapted properties (19 responses)</td>
<td>63.2%</td>
<td>26.3%</td>
<td>5.3%</td>
<td>0%</td>
<td>5.3%</td>
<td>%</td>
</tr>
<tr>
<td>Reduction in number of bands (19 responses)</td>
<td>31.6%</td>
<td>52.6%</td>
<td>10.5%</td>
<td>5.3%</td>
<td>0%</td>
<td>0%</td>
</tr>
<tr>
<td>Reduced Preference Band (19 responses)</td>
<td>26.3%</td>
<td>47.4%</td>
<td>10.5%</td>
<td>15.8%</td>
<td>0%</td>
<td>0%</td>
</tr>
</tbody>
</table>

*Note a couple of responses in this group appear to be from individuals and not organisations.

3.6 For Registered Providers and voluntary sector organisations, the areas of highest disagreement were the annual review process and the reduction in the number of refused offers. Voluntary Sector agencies highlighted concern that the 28-day timeframe for the annual review process was too short for some vulnerable groups. This was echoed in some of the comments made by the general public. Some Registered Providers indicated they would prefer the number of refused offers to reduce further to either one or two. Full details of all the consultation responses are contained in the Consultation Statement in Appendix B.

3.7 Following analysis of the consultation responses, the table below summarises where proposals have been amended post consultation:
<table>
<thead>
<tr>
<th>Proposal consulted upon</th>
<th>Change recommended to original proposal?</th>
<th>Outcome recommended post consultation</th>
</tr>
</thead>
<tbody>
<tr>
<td>Definitions to underpin revised policy – Adequately Housed</td>
<td>No</td>
<td>Implementation recommended</td>
</tr>
<tr>
<td>Definitions to underpin revised policy – Low Housing Need</td>
<td>Yes</td>
<td>Implementation recommended with following changes: Terminology to be changed to ‘housing need’ with minor amendments/additions to the definition.</td>
</tr>
<tr>
<td>Definitions to underpin revised policy – Tenancy Readiness</td>
<td>No</td>
<td>Implementation recommended</td>
</tr>
<tr>
<td>Qualification Criteria (assessed housing need and local connection)</td>
<td>No</td>
<td>Implementation recommended</td>
</tr>
<tr>
<td>Qualification Criteria (assessed housing need and no local connection – in expectational circumstances)</td>
<td>No</td>
<td>Implementation recommended</td>
</tr>
<tr>
<td>Qualification Criteria (to cease accepting applications from households with no housing need and no local connection to Coventry)</td>
<td>No</td>
<td>Implementation recommended</td>
</tr>
<tr>
<td>Qualification Criteria - To add an asset/income cap</td>
<td>No</td>
<td>Implementation recommended</td>
</tr>
<tr>
<td>Changing how people apply for housing – To have one application process with one form.</td>
<td>No</td>
<td>Implementation recommended</td>
</tr>
<tr>
<td>Changing how people apply for housing – For people to only have one live housing application.</td>
<td>No</td>
<td>Implementation recommended</td>
</tr>
<tr>
<td>Changing how people apply for housing – Changing the bidding cycle</td>
<td>No</td>
<td>Implementation recommended</td>
</tr>
<tr>
<td>Changing how people apply for housing – Annual Review Process</td>
<td>Yes</td>
<td>Implementation recommended with the following changes: The time allowed to complete the annual review process will be extended from the 28 days consulted upon to 56 days.</td>
</tr>
<tr>
<td>To reduce the number of refused offers to three.</td>
<td>No</td>
<td>Implementation recommended</td>
</tr>
<tr>
<td>Adapted Properties</td>
<td>No</td>
<td>Implementation recommended</td>
</tr>
<tr>
<td>Changing the current banding system – From 7 to 5 bands</td>
<td>Yes</td>
<td>Implementation recommended with the following change – Band 4 will be renamed ‘housing need’ instead</td>
</tr>
</tbody>
</table>
Changing the current banding system – Reduced Preference Band

| Changing the current banding system – Reduced Preference Band | No | Implementation recommended |

4. **Timetable for implementing this decision**

4.1 Subject to Cabinet approval, the revised policy will be implemented from Autumn 2020. The implementation process is dependent on a revised IT platform which will support the administration of the policy. The Housing and Homelessness Service is currently procuring a new system. It is anticipated that the outcome of the tender process will be known during Spring 2020.

4.2 The changes to the qualification criteria necessitate that all applicants will need to re-apply and a comprehensive review of current housing applications will need to be undertaken to reassess against the revised qualification criteria and for those applicants who meet the criteria, to determine the applicant’s priority band.

4.3 The level of re-assessment will be dependent on the information already held by the Housing and Homelessness Service about the applicants’ current housing circumstances. In some cases, this may mean the applicant is automatically transferred to an equivalent band without requiring a full re-assessment (e.g. applicants with priority relating to a homelessness application).

4.4 Any current applicants who do not meet the revised criteria will be notified and will have the right to request a review.

4.5 The Council will endeavour to contact all current applicants electronically or by other appropriate methods (post) to notify them of the changes and of the requirement for them to re-apply. There will be a specified date by which current applicants will need to re-apply.

4.6 In the event that a current applicant does not reapply, they can still make a subsequent housing register application, but they will be given a new registration date unless exceptional circumstances exist. The impact of this will mean that some current applicants would lose any previous waiting time which is considered during the shortlisting process after priority banding.

4.7 The proposed implementation timeline is as follows:
- March to June 2020 – IT changes preparation and designing application process and re-assessment process for current applicants
- July to August 2020 – Testing IT system ahead of implementation (including user testing)
- August - September 2020 – IT Implementation (Housing and Homelessness Service and Registered Provider)
- September – November 2020 – Re-registration and assessment of applicants
- November 2020 – Intention to ‘Go live’ with revised policy

4.8 A key aspect of the implementation will be to communicate the changes and required action to current Coventry Homefinder applicants from March 2020 onwards. This will be a key priority for the Coventry Homefinder Steering Group working alongside our voluntary sector partners.
5. **Comments from Director of Finance and Corporate Services**

5.1 **Financial implications**

The Council faces a significant financial pressure as a result of households in temporary accommodation. At Quarter 3 we are forecasting a £3.1m overspend for the service against a net budget of £9.6m. Although there are no direct savings built into the model for the financial impact of this, availability and allocation of permanent social housing is a key factor that can influence levels of temporary accommodation. Having an approved and clearly understood policy is therefore key to the future sustainability of the Housing and Homelessness service.

The direct financial implications relate to:

- the creation of a Housing Occupational Therapist post (para 2.14.2) at a cost of £46,500 per annum. This post will be funded from the Disabled Facilities Grant; and

- additional temporary staff to support the one-off reassessment of 12,000 households in line with the new policy criteria (para 2.12.5). This is at an estimated cost of £50,000 and will be funded from the Housing and Homelessness budget in 2020/21.

5.2 **Legal implications**

Under Part 6 of the Housing Act 1996 the Council, despite having no housing stock, is still required to have an allocation scheme which needs to include the Council's policy on offering those to be allocated housing a choice of housing accommodation or an opportunity to express preferences for accommodation. Further provisions exist regarding homelessness provision in the Homelessness Act 2002 and the Homelessness Reduction Act 2017.

In drafting the Homefinder policy, the statutory guidance "Allocation of Accommodation: Guidance for local housing authorities in England" June 2012 and the “Homelessness Code of Guidance for Local Authorities” February 2018 published by the Department for Communities and Local Government need to be taken into consideration.

When introducing a new allocations policy the Council must consult with all Private Registered Providers of social housing and registered social landlords with which they have nomination arrangements. As a housing allocations policy can have a significant impact on members of the public in an area, particularly those who are awaiting a housing allocation, it is also appropriate to consult with the public in general.

The Homefinder policy could impact on people with protected characteristics under the Equality Act 2010. Section 149 states that the Council must have regard to the Public Sector Equality Duty which is designed to eliminate discrimination, advance equality of opportunity and foster good relations between those people with a protected characteristic and those without.

6. **Other implications**

Any other specific implications
6.1 **How will this contribute to the Council Plan** ([www.coventry.gov.uk/councilplan/])?

The revised Coventry Homefinder Policy will contribute to meeting the priorities in the Corporate Plan, specifically;

- Locally Committed – protecting our most vulnerable people (including preventing homelessness and helping people who do become homeless).
- Locally Connected – Improve health and wellbeing
- Locally Connected – Reducing health inequalities.
- Globally Connected – reducing the impact of poverty

6.2 **How is risk being managed?**

The Policy has had regard to all relevant legislation and statutory guidance and has been developed following a robust consultation process. There is always the risk of challenge to a Council decision; however, this risk will be minimised by a policy meeting statutory requirements and applicants having the right to a review of certain decisions.

The Strategic oversight, implementation and co-ordination of this policy will be undertaken by the Coventry Homefinder Steering Group who will meet quarterly for the first year of policy and at least twice a year in subsequent years. The Homefinder Steering Group will include representatives from:

- Coventry City Council
- Citizen
- Midland Heart
- Orbit Heart of England
- Advice Services Coventry (Welfare Reform Working Together Group)

6.3 **What is the impact on the organisation?**

The revised Housing Allocations Policy supports the Council’s organisational priorities including our corporate parenting role. Whilst access to the Housing Register does not guarantee applicants being housed, it is felt the revised application process, qualification criteria and banding system will provide those with the greatest housing need a greater chance of being housed thus reducing deprivation and health equalities.

Implementing the revised policy will require a short-term staffing increase within the Coventry Homefinder Team as outline in section 5.2.

6.4 **Equality and Consultation Analysis (ECA)**

A full Equality and Consultation Analysis (ECA) has been carried out. The full document (parts 1 and 2) is located in **Appendix C** to the report.

The equalities analysis pre and post consultation has clearly indicated both potential positive and negative equality implications of the proposed changes to Coventry Homefinder (Social Housing Allocations Scheme). The potential positive equality implications could apply across all protected characteristics, particularly in respect of the changes supporting those in greatest housing need to be offered a suitable property. Assessing housing need at point of application is also seen as a positive change for all applicants including those with protected characteristics.
The specific changes to the way adapted properties are advertised and allocated is considered to be a very positive change for older people and people with disabilities who require an adapted property. People with disabilities are particularly supportive of this change. The changes to the banding system are positive for young people who are leaving care but there is concern that younger people living with friends and family or in shared accommodation are less likely to be offered housing.

The changes to the banding system will potentially negatively affect people from BME backgrounds who are:

a) currently living in overcrowded conditions or
b) who are currently registered in band 3b (no housing need and no local connection to Coventry) who no longer be able to register under the proposed qualification criteria.

Mitigations identified for overcrowded households include the revised policy providing flexibility as to how properties with two living rooms could provide additional bedroom provision with the agreement of the registered provider. As part of the implementation process all current applicants will need to re-apply and as part of this process the housing need of the household will be assessed. This will give applicants the opportunity to have their housing need assessed as where exceptional circumstances are identified they will still be able to re-register (as long as they need the other qualification criteria – applied to all applications).

As part of the implementation process equality impacts will be assessed. This will be supported by a new IT system currently being procured for the Housing and Homelessness Service which will improve the collection and analysis of equalities data. A review of the revised policy will be undertaken one year after implementation which will include a review of actual ECA impact.

6.5 Implications for (or impact on) climate change and the environment

There are no known implications or impacts on the environment from the proposals to amend the Housing Allocations Policy.

6.6 Implications for partner organisations?

As the Council no longer holds any housing following the stock transfer to Citizen (formerly Whitefriars Housing Association) in September 2000. Coventry Homefinder is therefore a partnership between Coventry City Council and Registered Providers (mostly Housing Associations) in the City.

Registered Providers have been actively engaged in the review of the Coventry Homefinder Policy. The revised policy supports their organisational objectives to let properties quickly and create balanced and sustainable communities.

Voluntary sector organisations have also contributed to the review and will have an important role in supporting some applicants through the implementation of the revised policy.

Nominated Registered Providers and a representative from the voluntary sector are members of the Coventry Homefinder Steering Group/Partnership who will have strategic oversight of the revised policy.
Report author(s):

**Name and job title:**
David Ashmore – Director of Housing and Transformation  
Gemma Tate – Change Manager – Transformation

**Directorate:** People

**Telephone and email contact:**
David Ashmore – [David.Ashmore@coventry.gov.uk](mailto:David.Ashmore@coventry.gov.uk)  
Telephone 024 7678 7915  
Gemma Tate – [Gemma.Tate@coventry.gov.uk](mailto:Gemma.Tate@coventry.gov.uk)  
Telephone 024 7697 1383

Enquiries should be directed to the above person.

<table>
<thead>
<tr>
<th>Contributor/approver name</th>
<th>Title</th>
<th>Directorate or organisation</th>
<th>Date doc sent out</th>
<th>Date response received or approved</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Contributors:</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Jim Crawshaw</td>
<td>Head of Housing and Homelessness</td>
<td>People</td>
<td>15.01.20</td>
<td>21.01.20</td>
</tr>
<tr>
<td>Mandeep Chouhan</td>
<td>Operations Manager Housing and Homelessness</td>
<td>People</td>
<td>15.01.20</td>
<td>21.01.20</td>
</tr>
<tr>
<td>James Harrison</td>
<td>Programme Manager</td>
<td>People</td>
<td>15.01.20</td>
<td>21.01.20</td>
</tr>
<tr>
<td>Shelia Stirling</td>
<td>Service Manager – Occupational Therapy and Community Equipment</td>
<td>People</td>
<td>15.01.20</td>
<td>21.01.20</td>
</tr>
<tr>
<td>Michelle Salmon</td>
<td>Governance Services Officer</td>
<td>Place</td>
<td>15.01.20</td>
<td>16.01.20</td>
</tr>
<tr>
<td><strong>Names of approvers for submission:</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>(officers and members)</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Rachael Sugars</td>
<td>Finance Manager</td>
<td>Place</td>
<td>15.01.20</td>
<td>21.01.20</td>
</tr>
<tr>
<td>Gillian Carter</td>
<td>Solicitor, Team Leader (Regulatory), Legal Services</td>
<td>Place</td>
<td>15.01.20</td>
<td>20.01.20</td>
</tr>
<tr>
<td>Gail Quinton</td>
<td>Deputy Chief Executive</td>
<td>People</td>
<td>22.01.20</td>
<td>27.01.20</td>
</tr>
<tr>
<td>Councillor T Khan</td>
<td>Cabinet Member Housing and Communities</td>
<td>-</td>
<td>22.01.20</td>
<td>27.01.20</td>
</tr>
</tbody>
</table>

This report is published on the council's website: [www.coventry.gov.uk/councilmeetings](http://www.coventry.gov.uk/councilmeetings)
Coventry Homefinder Policy 2020

Revised Policy – January 2020
Changes have been made post consultation

Implementation from Autumn 2020
## Contents

<table>
<thead>
<tr>
<th>Section</th>
<th>Description</th>
<th>Page</th>
</tr>
</thead>
<tbody>
<tr>
<td>Section 1:</td>
<td>Introduction to Coventry Homefinder</td>
<td>3</td>
</tr>
<tr>
<td>Section 2:</td>
<td>Other housing options</td>
<td>7</td>
</tr>
<tr>
<td>Section 3:</td>
<td>How to apply to the register</td>
<td>9</td>
</tr>
<tr>
<td>Section 4:</td>
<td>Who can apply to the register (Eligibility and Qualification Criteria)</td>
<td>14</td>
</tr>
<tr>
<td>Section 5:</td>
<td>How we decide between different housing needs (priority banding system)</td>
<td>19</td>
</tr>
<tr>
<td>Section 6:</td>
<td>The choice-based lettings scheme</td>
<td>33</td>
</tr>
<tr>
<td>Section 7:</td>
<td>Management of the scheme</td>
<td>44</td>
</tr>
</tbody>
</table>

The following sections may require technical amendments for operational delivery.

- Section 1.6 and 1.7
- Section 2
- Section 3.2
- Section 4.1
- Section 6.2, 6.5 to Section 6.12 and Section 6.19
- Section 7.1, 7.3 7.9 and 7.10
Section 1 – Introduction to Coventry Homefinder

1.1 Background

The Council no longer owns any housing following the Large-Scale Voluntary Transfer of all the former Council housing to Citizen (formerly Whitefriars Housing Association) in September 2000.

The Council works in partnership with the Registered Providers (Housing Associations) within the area. The providers own and manage their own housing stock, and most of their available homes are let through Coventry Homefinder, the Housing Needs Register.

This Policy provides a framework for the delivery of The Coventry Homefinder choice-based lettings scheme and describes how the allocation of social housing will be prioritised for those applicants who have the greatest housing need. **Social housing in Coventry is in high demand and short supply and there are far more people on the Housing Register than there are homes available to let.**

This policy is written and published to explain how:

- Applicants qualify to join the Housing Needs Register.
- Qualifying applicants are assessed and placed in different bandings of priority.
- Certain applicants on the Housing Needs Register have some choice about the home or housing they are offered.
- Applications are nominated to homes offered by Registered Providers.

The policy also ensures the Council meets its legal requirements governing the allocation of social housing.

Coventry City Council’s Housing and Homelessness Service is the lead organisation for the administration of this policy

1.2 The objectives of the Coventry Homefinder Policy

The objectives of the Coventry Homefinder Policy are to:

- Operate within the legal framework.
- Be realistic, simple and transparent.
- Make best use of social housing stock.
- Let properties quickly.
- Create balanced and sustainable communities.
1.3 Statement on Choice

Coventry City Council and the Homefinder partner Registered Providers are fully committed to enabling applicants to play an active role in choosing where they want to live, whilst continuing to prioritise those people in the greatest need, making the best use of the available housing stock and complying with all relevant legislation.

It is important to realise that the demand for accommodation is higher for some types of property and for some areas of the city than it is for others. In making a decision about the choices available, applicants need to consider their housing need priority against the availability of properties in any given area.

The Coventry Homefinder Scheme allows people to see the Registered Providers’ (Housing Associations and/or Housing Co-operatives) properties that are available and place a bid on (express an interest in) those properties they are eligible for and would like to be considered for during each bidding period.

Applicants will be informed of their relative position on the shortlist for that vacancy at the time of making the bid. This enables an applicant to make an informed choice when deciding which property to express an interest in/bid on and whether to consider alternative housing options. The final shortlisting position is only known once the bidding round for that property has ended. Feedback on lettings of previously advertised properties is also available.

1.4 The Legal Framework

This document sets out the Coventry Homefinder Lettings Policy, which determines the priorities and procedure for nominating applicants to Registered Providers in accordance with Part 6 of the Housing Act 1996, as amended by the Homelessness Act 2002, the Localism Act 2011 and the Homelessness Reduction Act 2017.

The Policy ensures that reasonable preference is given to applicants who fall within the reasonable preference categories in accordance with section 166A(3) of the Housing Act 1996. More detail on reasonable preference is set out in section 5.

This Policy also sets out the priorities and procedures for nominations of existing social housing tenants who do not fall into the groups to whom reasonable preference must be given, in line with Section 145 of the Localism Act 2011. These will be considered for allocation under the same policy framework.

This Policy has been developed with regard to the statutory guidance issued to local housing authorities in England (Allocation of Accommodation: guidance for local housing authorities in England, Department for Communities and Local Government, issued June 2012).

All nominations will be made in accordance with this Policy.

Whilst this policy determines how social housing will be allocated it should be noted that in certain circumstances e.g. when considering an offer of accommodation, the lettings policy of individual Scheme Landlords (Register Providers / Housing Associations) may override this Policy.
1.5 *Equality and fairness*

In framing this Policy, the Council has had regard to its duties under the Equality Act 2010. The Policy seeks to ensure that each application is dealt with fairly, irrespective of race, age, gender, disability, sexual orientation, gender reassignment, pregnancy or maternity, religion or belief, and to comply with all relevant legislation.

1.6 *Advice and information*

A summary of this scheme is available to all applicants. The full copy of this policy will be available to view on request from the Coventry Customer Service Centre or it can be downloaded from the following website: [www.coventryhomefinder.com](http://www.coventryhomefinder.com)

The Council has a duty to people in its area to ensure that:

- Advice and information about the right to make an application for housing is available free of charge.
- Assistance is given free of charge to those who are likely to have difficulty in making an application for housing without such assistance.

Applicants also have the right to the following general information:

- Information that will enable them to assess how their application is likely to be treated under the authority’s allocation scheme and in particular, whether they are likely to fall within the reasonable preference categories.
- Information about previous lettings and previous availability of properties is published on the Homefinder website (see section 6.19 for more detail).

1.7 *Assistance for those that cannot use the system*

Coventry Homefinder aims to ensure equal access to all and has developed a number of ways by which those who are unable to use the system themselves and don’t have support otherwise available to them, are not disadvantaged.

This includes:

- Bidding by automated telephone line.
- Placing bids (assistive and/or auto bidding) for vulnerable households based on pre-agreed criteria of location and property type.

To access this support applicants or their advocates (with written approval to represent them) should contact the Homefinder Team on 024 76 834024 or by emailing [coventryhomefinder@coventry.gov.uk](mailto:coventryhomefinder@coventry.gov.uk) to discuss what assistance can be provided.
1.8 *Situations not covered by the Coventry Homefinder Policy*

This policy also does not cover mutual exchanges, reviews of Fixed Term Tenancies, assignments or successions as these are not allocations or nominations under Part VI of the Housing Act 1996.
Section 2 – Other Housing Options

This Policy aims to ensure that those in the greatest housing need are given appropriate priority for social housing whilst offering informed choice and making the best use of the limited social housing availability in the City. **There is very high demand for social housing in Coventry and applicants should consider other housing options alongside their Coventry Homefinder registration.**

Some examples of other housing options to consider include:

<table>
<thead>
<tr>
<th>Housing Options</th>
<th>Brief details</th>
<th>Contact</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Renting from a Private Landlord</strong></td>
<td>Private landlords may be able to offer the type or location of accommodation required, especially if you want accommodation in popular areas where there is little social housing. If eligible, you may be able to claim for assistance with housing costs through Universal Credit or Housing Benefit/Local Housing Allowance.</td>
<td>Contact estate and lettings agencies, look for properties advertised for rent in local papers, use property websites such as <a href="http://www.rightmove.co.uk">www.rightmove.co.uk</a>. Advice about different tenancy types can be found on the Shelter website <a href="http://www.shelter.org.uk">www.shelter.org.uk</a>.</td>
</tr>
<tr>
<td><strong>Mutual Exchange</strong></td>
<td>If you are currently a tenant of a social landlord, you may be able to exchange your property with another tenant.</td>
<td>Contact your landlord or use websites such as <a href="http://www.homeswapper.co.uk">www.homeswapper.co.uk</a> or <a href="http://www.houseexchange.org.uk">www.houseexchange.org.uk</a> <a href="http://www.swapandmove.co.uk">www.swapandmove.co.uk</a>.</td>
</tr>
<tr>
<td><strong>Homes Direct</strong></td>
<td>Midland Heart Housing Association has set up a choice based letting system for properties across the West Midlands area. Several landlords with properties in Coventry advertise properties through this system. This gives additional options, especially if you are considering moving out of the Coventry area.</td>
<td><a href="http://www.homesdirect.org.uk">www.homesdirect.org.uk</a></td>
</tr>
<tr>
<td><strong>Affordable Home Ownership</strong></td>
<td>There is a range of products designed to allow people to access more affordable home ownership, for example 'shared ownership'.</td>
<td>Find out about the range of affordable home ownership products at <a href="http://www.helpetobuy.gov.uk">www.helpetobuy.gov.uk</a>.</td>
</tr>
<tr>
<td>Housing Options</td>
<td>Brief details</td>
<td>Contact</td>
</tr>
<tr>
<td>-------------------------------------</td>
<td>-------------------------------------------------------------------------------</td>
<td>---------------------------------------------------------------------------------------------------</td>
</tr>
<tr>
<td>Open Market Home Ownership</td>
<td>Dependent on income and savings levels, home ownership on the open market may be a suitable option.</td>
<td>Contact estate agents, look for properties advertised for sale in local papers, use property websites such as <a href="http://www.rightmove.co.uk">www.rightmove.co.uk</a></td>
</tr>
<tr>
<td>Short term accommodation - Hostels</td>
<td>Short term accommodation is available from direct access hostels in the city. This may also include support to access permanent accommodation.</td>
<td>Will provide CCC website link following starting of newly commissioned contracts (April 2020)</td>
</tr>
</tbody>
</table>
Section 3 – How to apply to the Register

3.1 Who can apply to Coventry Homefinder?

Anyone over 16 years of age, who is eligible and who meets the qualifying criteria may apply to Coventry Homefinder.

Registered Providers have different policies in dealing with persons under the age of 18. Registered Providers will not normally allow an allocation of accommodation to anyone under the age of 18 years. However, there may be exceptional circumstances where a tenancy can be held in trust by a guarantor (for example where a young person leaving care is referred by children’s social care services, where they agree to hold the tenancy in trust and where a suitable support package is in place).

3.2 Application process – How to apply

If you believe you meet the eligibility and qualifying criteria outlined in Section 4, you can apply through an online application form at http://www.coventryhomefinder.com

Computers are available in the Customer Service Centre and Public Libraries (https://www.coventry.gov.uk/aboutcovlibraries) to facilitate the online application process for applicants who don’t have readily available access to the internet.

If you require assistance to complete an online application, you can contact the Council at the Customer Service Centre in Broadgate. Support is also available from various advice agencies in the city. For further details go to https://www.adviceservicescoventry.org.uk/

Once a fully completed application form has been received along with the required supporting documentation, the information submitted will be assessed to determine if applicants are eligible and qualify, followed by an assessment of their housing need.

All applicants will be required to provide evidence to verify both their eligibility and qualification status at the point of application and again at the point of allocation of a property. This can include but is not limited to:

- proof of identity for all those included on the application.
- proof of current address.
- details of any dependants and other household members.
- confirmation of income and savings.
- details relating to previous accommodation, where appropriate.
- details and supporting evidence, where required of their housing need and circumstances.

All applicants will be required to give consent for third parties to be contacted in order to check information, and to obtain any further information relating to housing need and circumstances (if required).
3.3 **Who can I include in my application?**

Applicants can only have one live application either as the lead applicant or as a household member. Applicants should only include people in their application who will be part of their household and occupying the accommodation as their principal home. Applicants can only include people who normally reside with them or could reasonably be expected to do so. This can include:

- a partner, civil partner, or spouse.
- dependent children, including children for whom they have been approved to foster/adopt within their household.
- siblings.
- adult children.
- other adults who are dependent upon them, or care for them.
- other adults whom you wish to live with (e.g. friends who wish to live together) whereby one person agrees to become the lead applicant for the tenancy agreement.

Applicants should not include people they currently live with who will not be moving with them.

3.4 **What size property will I be eligible for?**

When assessing the size of property that a household will be eligible for, Coventry Homefinder will use the Bedroom Standard.

The Coventry Homefinder Policy will allocate a separate bedroom to:

- Each married or cohabiting couple (including civil partners).
- Each adult aged 21 years or more, not in a couple.
- Any two children/adolescents of the same sex under 21.
- Any two children of opposite sex under 10.
- Any other child who cannot be paired with another as above.
- A carer who does not live as part of the household but provides the applicant or a member of the household with overnight care on four or more nights per week.
- Additional bedrooms (if required) for pregnant applicants will be awarded after 26 weeks of pregnancy. Proof of pregnancy will be required.

Living areas can be used as a sleeping area for occasional carers. Only in exceptional circumstances will applicants be eligible for an additional bedroom.
Where properties have two living rooms (also known as parlour houses) one of these rooms could be used as a downstairs bedroom with the agreement of the Registered Provider. This will be specified on the advert for the property.

Applicants must be able to show, through an affordability assessment, that they are able to cover the full rental costs of the property. If they cannot, the Registered Provider may not make an offer of accommodation for the property.

**Access to children:**

Where an applicant has a shared residence order or staying access for a child or children (under 18 years old), they may not be automatically entitled to bedrooms for their children, as the Coventry Homefinder Policy adopts the principle that the children need one home of an adequate size.

In determining the size of accommodation required for a household, children from current or former relationships will only be counted as part of the household where appropriate evidence has been provided to determine that the applicant has the main responsibility for the children and where the children have their main home. In determining this, each application will be assessed on a case by case basis taking into account:

- Receipt of Child Benefit
- Court Orders
- Percentage of time spent caring for the children
- The regularity and permanence of the arrangement
- Which parent has adequate housing where your child or children can reside
- Any exceptional circumstances which mean that it is necessary for a child or children to have a home with both parents due to health and/or social care needs.
- Affordability.

The applicant must be able to show they can meet the full rental costs associated with the property having an additional bedroom through an affordability assessment. If they cannot, the Registered Provider may not make an offer of accommodation for the property.

### 3.5 Joint Applications

- Two people may make a joint application to Coventry Homefinder if they are eligible and qualify to register.

- Where both applicants are under 18, they may not be considered for a registered provider tenancy until the oldest applicant reaches 18 years of age.

- Joint applicants are both responsible for the security of their application and must ensure that the log in details and password are kept safe.
3.6 Multiple Applications

A person may only register one live application as a main applicant or as a household member.

In order to prevent duplication of applications the household must provide their National Insurance number to register. Once a National Insurance number is registered on Coventry Homefinder no further registrations can be made for that National Insurance number.

- Applicants will keep the same Coventry Homefinder registration number for life, this is linked to the registered National Insurance number.
- If the application is closed (for example, once an applicant is housed) any subsequent applications made under the same applicant’s name will have the same registration number.

3.7 Applications from employees linked to Coventry Homefinder

Applications can be accepted from Coventry City Council employees, employees of Registered Providers, elected members, board members and their close relatives, provided they are eligible to apply and meet the qualifying criteria. Applicants must disclose any such relationship at the time of application and at the time that an offer of accommodation is made. Any application for priority for employees linked to Coventry Homefinder must be verified by the Operations Manager with responsibility for Housing or the Head of Housing and Homelessness.

3.8 Registration Date/Effective Band Date

All applications will be given a registration date which reflects the time that they have been registered. An effective date is the date from which an applicant has been in their current band for. For new applicants to the register the registration date and the effective date will be the same. If an applicant’s assessed housing need changes and they submit a change of circumstances form their effective date may change if there is a change to the applicant’s band.

The effective date will be used when shortlisting to determine how long the applicant has been assessed as requiring priority in the band and/or has been registered with Coventry Homefinder.

- For applicants who apply to the housing need register after the implementation date of this policy – the effective date will be the date their registration was approved.
- For applicants who transferred from the old scheme (pre 2020) and were previously placed in the old bands 1A-2C their effective date will be the date priority banding was originally awarded.
- For applicants who transferred from the old scheme (pre 2020) and were previously in band 3A or 3B their effective date will be the date of their original registration.
- If at any point an applicant is placed in the reduced preference band, they will retain their original effective date.
When applicants move to a different band due to a change in their circumstances, the following will apply:

- Moving to a higher band: the effective date will be the date that the higher band priority was applied for.
- Moving to a lower band, within the housing needs priority Bands 1 to Band 4: the effective date will be the earliest date that a priority need band was applied for which could be the original registration date.

3.9 **Deliberately withholding or giving false information**

It is an offence to:

- obtain, or try to obtain, a social housing tenancy by deception
- knowingly keep back information that we need to assess your application
- knowingly or recklessly provide false information about your circumstances

Doing so could result in any or all of the following:

- permanent removal from the housing needs register application, as they may be assessed as being unsuitable to qualify for an allocation.
- changing a decision that an applicant is owed a statutory duty as a homeless person
- possession proceedings against any tenancy obtained as a result of a false statement and may also attempt to recover any costs incurred. The Council will also work with a Registered Provider to consider legal action through the criminal courts.

Following investigation, if an applicant is found to have knowingly provided false information or withheld information and is consequently removed from the register, they will be notified of the decision and the reasons for it in writing and informed of their right to request a review.
Section 4 – Who can apply to the Register (Eligibility and Qualification Criteria)

4.1 Eligibility Criteria – Who is eligible to join the housing register?

You will meet the eligibility criteria for qualifying for the housing need register if you are:

- British or Irish citizens who are habitually resident in the Common Travel Area (United Kingdom, Republic of Ireland, Channel Islands and the Isle of Man).

- EEA nationals exercising a right to reside in the UK under EEA regulations – other than the initial right to reside or being a jobseeker. (Subject to change)

- A person granted some form of leave to enter or remain in the UK without condition that they and any dependants should make no recourse to public funds.

4.2 Eligibility Criteria – Who is not eligible to join the housing register?

You will not be eligible to qualify for the Register if you do not have recourse to public funds due to your immigration status. This includes applicants who:

- are subject to immigration control within the meaning of the Asylum and Immigration Act 1996 (unless he or she comes within a class prescribed in regulations made by the Secretary of State).

- only have a right to reside in the UK because they (or a member of their household) are a jobseeker.

- are not habitually resident in the Common Travel Area (i.e. The U.K., Channel Islands, Isle of Man and the Republic of Ireland).

- Have a right to reside in the UK of less than three months.

The legislation governing eligibility may change from time to time and the description of the current position as set out above is not definitive.

If you are eligible for housing but your partner is not eligible because they fall into one of the above groups, you may be able to bid for accommodation, but if you are successful in securing a tenancy, you will not be able to have a joint tenancy with your partner.

Eligibility will be considered at the time of application and at the time of an offer of allocation to a property. Applicants must inform Coventry Homefinder of any change in their immigration status.

If an applicant is found to be ineligible, they will be notified of the decision and the reasons for it in writing and informed of their right to request a review.
4.3 Who cannot register with Coventry Homefinder? - Qualification Criteria

In addition to the eligibility criteria, the Localism Act 2011 gave local authorities the power to determine what classes of persons are (or are not) persons to be allocated social housing in their area. This is known as ‘qualifying criteria’.

Local Authorities can identify groups who will not qualify for an allocation of social housing, by considering:

- if a household has accommodation suitable for their need and they have ability to meet their own housing costs
- any behaviour that affects a person’s ability to be a suitable tenant
- If there is any/no local connection between the household and the local authority

4.3.1 Financial circumstances – Income and Capital

Households with sufficient income or capital to meet their own housing needs will not qualify for the Housing Needs Register. This means that they are judged to be able to afford to house themselves, either by privately renting or buying a home of an appropriate size for their needs.

If your gross household income is above £50,000 per year then you will not be allowed to join the Housing Needs Register (considering the income of all adult members of the household – those seeking to be rehoused with you).

You will not be able to join the register if you or members of your household (those seeking to be rehoused with you) have capital (savings, investments or other assets) of £50,000 or more. You should be able to pay the tenancy deposit or rent in advance to enable you to access privately rented housing without assistance from the Council. Alternatively, dependent on your circumstances you may be in a position to purchase a property either through a shared ownership scheme or from the open market. For the purpose of capital this excludes any capital held in trust for children under 18 years.

The income and savings rules do not apply in the following cases:

- Home owner(s) who cannot maintain, or manage in their existing home, and need sheltered housing or other age restricted housing. Some Registered Providers may require evidence of the commitment to sell the property within a specified timeframe.

- Applicants who wish to register to access shared ownership housing only where the asset and income level is nationally set at a higher threshold of more than £50,000.

- Other exceptional cases may be allowed by the Housing Operations Manager, Housing Capacity Manager or the Head of Housing and Homelessness. Exceptional circumstances will be assessed on a case by case basis.

4.3.2 Housing need

Applicants who have no assessed housing need and are currently adequately housed will not qualify to join the Register. This means they do not need to be given greater priority for any
reason given in the housing legislation, and do not meet any of the banding criteria set out in Section 5 of this policy.

Adequately housed is defined as follows:

*Applicants who are already housed in accommodation that meets their needs, both in terms of size, property type, property condition, location and affordability.*

### 4.3.3 Unacceptable behaviour

Applicants *may* also be disqualified from the Housing Register if the main applicant, joint applicant or a member of their household has been guilty of unacceptable behaviour serious enough to make him or her unsuitable to be a tenant. – Section 167 Housing Act

Whilst not exhaustive, the following list illustrates the types of serious unacceptable behaviour which *may* make an applicant unsuitable to be a tenant and will lead to exclusion from the Allocations Scheme. This can include:

**Rent arrears and failing to comply with a current or previous tenancy agreement**

- Owing significant rent arrears from a current or previous tenancy including rent, sundry debts, damage or any other identified costs and there is no repayment agreement in place.
- Failing to comply with a current or past tenancy agreement with a Council, Registered Provider or Private Landlord to the extent that they have been evicted or a court has granted an outright possession order. An exception to this would be where an applicant has received a no-fault Section 21 notice.

**Anti-social behaviour**

- Have been lawfully evicted for antisocial behaviour, nuisance or harassment and are not engaging with support services.
- Are or have been subject to a court order for antisocial behaviour, nuisance or harassment; for example, have a possession order, injunction, ASBO and are not engaging with support services.
- Allowing the condition of the property to deteriorate.
- Allowing any furniture or fixtures provided by the landlord to deteriorate due to ill treatment

**Some types of criminal behaviour**

- Being violent towards a partner or members of the family
- Have a conviction relating to use of their current or former property for illegal or immoral purposes e.g. the manufacture, sale or supply of drugs.
- Have been convicted for some criminal offences, such as arson, violent behaviour, use or possession of offensive weapons (e.g. gun crime/knife crime) and is not engaging with support services.
- Obtaining a tenancy by deception, for example by giving untrue information

This list is not exhaustive, and cases will be considered on an individual basis.
The decision that an applicant does not qualify for an allocation of accommodation may be taken at any point during the life of the application and the application will then be closed.

The decision that an applicant does not qualify to join the register on the grounds of unsuitable behaviour will be made by a member of the Coventry Homefinder Team after consideration of available evidence.

If an applicant is found not to qualify, they will be notified of the decision and the reasons for it in writing and informed of their right to request a review.

There may be instances where an applicant’s behaviour is not serious enough to mean that they do not qualify to register, however, their conduct may mean that individual Registered Provider would not consider them for a tenancy. Depending on the reasons this may mean an applicant is placed in the Reduced Preference Band. (see section 5.11).

Applicants who are assessed as not qualifying under this section of the policy will normally not be allowed to re-register for a period of 12 months. However, applicants may make a fresh application if there has been a factual change in the applicant’s circumstances and/or the applicant can prove a change in their behaviour.

### 4.3.4 Local Connection

All applicants that are eligible and that meet the qualifying criteria can register. However, applicants without a local connection will only be registered in exceptional circumstances and will be placed in the Housing Need Band – Band 4. As part of their application process they will need to explain their exceptional circumstances. The decision to register an applicant without a local connection will be assessed on a case by case basis.

Applicants can demonstrate a local connection if they can evidence one or more of the following:

- They have lived within the Coventry local authority area for 6 out of the last 12 months or 3 out of the last 5 years (such time periods being continuous in each case), or
- Their regular place of work is within the Coventry local authority area (not including casual or seasonal work with daily pay rather than contracted work or those with a zero hours contract), or
- They have close family connections with someone currently living in the Coventry local authority area and who has lived within the local authority area for 6 out of the last 12 months or 3 out of the last 5 years (such time periods being continuous in each case). This includes parents, siblings and adult children.
- Other family members such as step-parents, grandparents, grandchildren, aunts or uncles may also demonstrate a local connection if there are sufficiently close family links in the form of frequent contact and established family relationships or the applicant or extended family member is providing significant ongoing care and support to the other person.

The local connection criterion does not apply to:
- People moving to escape violence.
- Those applicants connected to the Armed Forces who are classed as a relevant person under The Allocation of Housing (Qualification Criteria for Armed Forces) (England) Regulations 2012 (See section 5.3).
- For existing social tenants seeking to transfer from another local authority who have a need to move to avoid hardship or to move to take up an offer of work under the Allocation of Housing (Qualification Criteria for Right to Move) England 2015 (See section 5.8.4).
- Children in the care of the Local Authority for whom the allocations policy applies.

4.4 Decisions on qualifying criteria

The decision that an applicant does not qualify for an allocation of accommodation may be taken at the time that the application is made, or at any point during the life of the application including if the applicant’s circumstances change so that they no longer meet the qualifying criteria. The application will then be closed.

If an applicant is found not to qualify, they will be notified of the decision and the reasons for it in writing and informed of their right to request a review.

An applicant who has previously been told they do not qualify to the housing register will be able to re-apply; if they can demonstrate their circumstances have subsequently changed and they now believe they meet the qualification criteria.
Section 5 – How we decide between different housing needs (priority banding system)

5.1 How Priority Is Given – Summary Table of Bands

Coventry Homefinder has 5 bands (bands 1 to 4 and a reduced preference band) that reflect the extent of housing need experienced by the household. The table below shows the different levels of need that are recognised in this policy.

<table>
<thead>
<tr>
<th>Level of Need and Homefinder Band</th>
<th>Housing Need Category</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Urgent Housing Need Band 1</strong></td>
<td>Statutorily Homeless (Main Housing Duty accepted as a homeless household). This also includes the National Witness Mobility Scheme.</td>
</tr>
<tr>
<td></td>
<td>Urgent housing need due to health and/or social care difficulties</td>
</tr>
<tr>
<td></td>
<td>Urgent housing need due to Social and/or Welfare issues (including unsanitary conditions, fleeing violence, moving due to redevelopment, moving to release disabled persons accommodation, Approved fosters carers and adopters who require more appropriate accommodation, Families who are being reunited following the children being returned from the care of Local Authority)</td>
</tr>
<tr>
<td></td>
<td>Coventry Care Leavers who are assessed as tenancy ready</td>
</tr>
<tr>
<td></td>
<td>Tenants of partner housing providers who are under-occupying a property by 2 or more bedrooms</td>
</tr>
<tr>
<td><strong>High Housing Need Band 2</strong></td>
<td>People living in named short-term supported accommodation including hostels and refuges, and who are assessed as tenancy ready</td>
</tr>
<tr>
<td></td>
<td>Overcrowding – require an additional 2 or more bedrooms</td>
</tr>
<tr>
<td></td>
<td>Homelessness Relief (households at relief duty stage)</td>
</tr>
<tr>
<td></td>
<td>Tenants of partner housing providers who are under-occupying by one bedroom</td>
</tr>
<tr>
<td><strong>Medium Housing Need Band 3</strong></td>
<td>Homelessness Prevention (households at prevention duty stage)</td>
</tr>
<tr>
<td></td>
<td>Homeless households who do not have a priority need</td>
</tr>
<tr>
<td></td>
<td>Housing need due to health and or social care difficulties</td>
</tr>
<tr>
<td></td>
<td>Housing need relating to Social, Welfare or Hardship issues</td>
</tr>
<tr>
<td></td>
<td>Overcrowding – requires 1 additional bedroom</td>
</tr>
<tr>
<td><strong>Housing Need Band 4</strong></td>
<td>Housing need with local connection (including newly forming households – applicants living with friends or family wanting their own accommodation or applicants currently living apart who want to live together, applicants currently living together who wish to live apart, applicants who are or could potentially experience financial difficulty if they remained in their current accommodation, applicants who are currently living in a property in disrepair)</td>
</tr>
<tr>
<td></td>
<td>Coventry Care Leavers (who are not tenancy ready) or Care leavers with no local connection</td>
</tr>
<tr>
<td>Level of Need and Homefinder Band</td>
<td>Housing Need Category</td>
</tr>
<tr>
<td>----------------------------------</td>
<td>-----------------------</td>
</tr>
<tr>
<td>People living in named short-term supported accommodation including hostels and refuges who are not tenancy ready.</td>
<td></td>
</tr>
<tr>
<td>Intentionally homeless households</td>
<td></td>
</tr>
<tr>
<td>Housing need - no local connection (exceptional circumstances)</td>
<td></td>
</tr>
<tr>
<td>Reduced Preference</td>
<td>Reduced priority status due to unacceptable behaviour or rent arrears</td>
</tr>
<tr>
<td>Households where main the housing duty has ended due to refusal of a suitable offer of accommodation</td>
<td></td>
</tr>
<tr>
<td>Households who have refused 3 offers of accommodation under the Homefinder Policy</td>
<td></td>
</tr>
<tr>
<td>Households in bands 1 and 2 who have not actively bid for suitable accommodation</td>
<td></td>
</tr>
</tbody>
</table>

5.2 **Reasonable Preference**

Section 166A(3) of the Housing Act 1996 (as amended) requires that Councils, within their allocations policies need to give certain groups of applicants ‘reasonable preference’: This includes:

- People who are homeless within the meaning of Part 7 of the Housing Act 1996 (including those who are owed prevention or relief duties, are found intentionally homeless and those not in priority need).
- People occupying unsanitary or overcrowded housing or otherwise living in unsatisfactory housing conditions.
- People who need to move on medical or welfare grounds, including grounds related to a disability.
- People who need to move to a particular locality in the district of the housing authority, where failure to meet that need would cause hardship (to themselves or others).
- People who are owed a duty under section 190(2), 193(2) or 195(2) of the 1996 Act (or under section 65(2) or 68(2) of the Housing Act 1985) or who are occupying accommodation secured by any housing authority under section 192(3).

The Policy is framed so as to give reasonable preference to applicants who fall into these categories, over those who do not, through a priority banding system. This is summarised above in section 5.1 and described in more detail below in section 5.5 to 5.11.

5.3 **Additional Preference – Armed Forces**

Additional preference must be given to an applicant who has an assessed housing need (under the reasonable preference categories) **and** who:

20
• Is a former member of the regular armed forces, or

• Is serving in the regular armed forces and is suffering from a serious injury, illness or disability as a result of the person’s service, or

• Is a bereaved spouse or civil partner of a member of the regular armed forces who is leaving services family accommodation following the death of their spouse or partner in service, or

• Serving or former members of the reserve forces suffering from a serious injury, illness or disability as a result of their service.

The definition of “armed forces,” “regular forces” and the “reserved forces” is set out in Section 374 of the Armed Forces Act 206. The “regular forces” means the Royal Navy, the Royal Marines, the regular army, or the Royal Air Force. The “reserve forces” means the Royal Fleet Reserve, the Royal Navy Reserve, the Marine Reserve, the Army Reserve, the Territorial Army, the Royal Airforce Reserve or the Royal Auxiliary Air Force.

If an applicant requests additional priority on these grounds, following assessment they will be placed in one band above the band that they would have been placed in had their application been based on reasonable preference housing needs alone. This will award them additional preference over others with the same urgent housing needs and meet the provisions set out in The Housing Act 1996 (Additional Preference for Armed Forces) (England) Regulations 2012.

Applicants that meet the above criteria that have an urgent housing need that would place them in Band 1 will remain in Band 1, as this is the highest priority that they can receive, however the effective date will be adjusted to give one additional year of priority.

(Example: an applicant is a former member of the regular armed forces whose household is overcrowded and needs one additional bedroom. The household would ordinarily be placed in Band 3 due to overcrowding but will be placed in the band above - Band 2 - due to their overcrowding and the fact that they were formerly serving in the regular armed forces).

Applicants with no reasonable preference housing need that would otherwise result in them being placed in Bands 1 to 4 will not be able to register on Coventry Homefinder, the same criteria as other applicants.

Local housing authorities are also required to frame their policies so that local connection is not taken into regard when deciding whether someone is a qualifying person (is able to join the register) if they are a member or former member of the regular Armed Forces (and certain family members or current or former members of reserve forces) under certain circumstances.

The Coventry Homefinder Policy does not restrict any applicants’ ability to register (to ‘qualify’) based only on their local connection, as applicants with a housing need and no local connection can register in exceptional circumstances. A member or former member of the Armed Forces (and certain family members or current or former members reserve forces) would be included within this criteria therefore it complies with these provisions in The Allocation of Housing (Qualification Criteria for Armed Forces) (England) Regulations 2012.
5.4 Other local priorities

This policy will also give priority to the following groups. These priorities have been mutually agreed between the Registered Providers using Coventry Homefinder and the Council. These priorities are:

- Coventry Care Leavers who are assessed as ‘tenancy ready’ and this is confirmed by the Council’s Children’s Social Care Department. This priority supports the Council in its role as a Corporate Parent.

- Households who are approved foster carers or adoptive parents who the Council’s Children’s Social Care Department have confirmed require more appropriate accommodation in order for them to be able to foster or adopt.

- People who are fleeing violence, harassment or abuse.

- Households who are under-occupying their current social housing accommodation (of a partner registered provider and living in Coventry) and wish to move to a smaller property.

- Households who need to move from their current social housing accommodation (of a partner registered provider) in order to enable the redevelopment or refurbishment of housing.

- Households who currently live in a purpose built or an adapted property (of a partner registered provider and living in Coventry) that is suitable for a disabled person, who no longer need to live in that type of accommodation and wish to move.

5.5 The Bands Described

The sections below (5.6 to 5.11) describe how your circumstances will place you into a band. Your application will be placed into the band according to how urgent your current housing need is (bands 1 to 4). If an applicant or a member of their household has more than one identified housing need for example an urgent housing need due to a health and social care difficulties (band 1) and are overcrowded and need 1 additional bedroom (band 3), they will be placed in the band which affords greatest priority.

Some applicants could be placed in the reduced preference band (see Section 5.11) and this means they have the least likelihood of being re-housed. This is because they will only be considered for housing after those households in bands 1 to 4.

5.6 Urgent Housing Need – Band 1

Band 1 is the top band within the Coventry Homefinder banding system. This means households in this band have been assessed as having the most urgent housing need. The reasons this priority is awarded is as follows:
5.6.1 Homelessness - Statutorily Homeless Households (including National Witness Mobility Scheme)

Applicants assessed by Coventry City Council as statutorily homeless and owed the main housing duty will be made one offer of suitable accommodation. Within the Coventry Homefinder system applicants will receive Band 1 priority, however bids for available properties will be made by the Council’s Housing and Homelessness Service on their behalf. This is to ensure that the duty to secure settled accommodation is complied with as soon as possible.

Statutorily homeless households may also be offered suitable accommodation within the Private Rented Sector to enable the Council to discharge the main housing duty.

Applicants who are supported through the National Witness Mobility Scheme will also be provided with this priority and their support worker from the scheme will bid on their behalf. This process will be a closely managed, confidential situation between the scheme and the Senior Housing Officer, Housing Operational Manager, the Housing Capacity Manager or the Head of Housing and Homelessness.

5.6.2 Urgent Housing Need due to health and/or social care difficulties

The assessment of priority due to health difficulties is not based on the seriousness of the applicant’s condition but rather it is solely based on the impact that the current type and/or location of their current housing is having on that condition and whether this would improve significantly through a move to alternative accommodation.

Assessments for priority due to medical need will normally relate to the physical circumstances in the property but location can be considered, for example where medical evidence has clearly demonstrated that the environment in general is having an impact on the mental health of the applicant.

To ensure assessments are accurate and resources are fully considered an assessment of the present accommodation by an Occupational Therapist or other health professional will be required for all applicants before priority is considered. It may be more appropriate to consider the provision of aids and adaptations for the applicant to remain in their current property instead of moving to other accommodation. Priority will not be awarded if it is reasonable to provide aids and adaptations to make the current accommodation suitable. Priority will only be awarded if aids and adaptations cannot be provided.

To be awarded Urgent Housing Need due to Health and/or Social Care Difficulties an applicant will need to demonstrate their urgent need to move. Listed below are some examples of when this priority level will be awarded (this list is not exhaustive):

- Applicant or household member is ready to be discharged from hospital or residential care, but they are unable to access any essential facilities within their home;
- Applicant or household member with severe long-term health conditions causing substantial disabilities who are unable to enter or leave their home (housebound) due
to stair access that cannot be resolved by use of aids or adaptations and are unable to access all the essential facilities (bathing/toileting, cooking and separate room for sleeping) in their current accommodation;

- Applicant or household member must have significant mental health or other health problems that are being caused or made worse by the housing situation (property type and/or location) and this could be resolved by urgent re-housing;

- Applicant or household member has a life-threatening or life-limiting illness or condition which is being negatively impacted by their current accommodation;

Coventry Homefinder would expect that customers with this level of need would normally be in receipt of disability related benefits.

Where an applicant refuses to have the recommended aids and/or adaptations fitted the applicant will be placed in Band 3 – housing need due to health and social care, unless they have other identified housing needs that would place them in a higher band.

5.6.3 Urgent Housing Need due to Social and Welfare Issues

There are some circumstances where the provision of alternative accommodation is required due to the social and welfare needs of the household. These cases will all be assessed according to their own individual circumstances and priority will be considered based on the impact of the present housing on the needs of the household members.

Examples of Urgent Housing Need due to Social and Welfare priority include:

- People fleeing violence, harassment or abuse with an urgent need to move (e.g. domestic violence/racial harassment incidents/hate crime resulting in intimidation or serious threats or damage to property which are recurrent or an ongoing threat has been identified) Award of this priority will only be awarded with appropriate evidence from the Police, other statutory body, or support agency that the difficulties experienced are directed at the household and they must move from their current accommodation as a matter of urgency.

- Unsanitary/unsuitable conditions (Health & Safety hazards - Category 1 hazards as outlined in the Housing Health and Safety Rating System) and housing conditions affecting health of household (e.g. properties in serious disrepair, properties lacking bathroom or kitchen facilities or lacking water, gas, electricity or adequate heating) that can't be resolved by the landlord or property owner (after appropriate Council enforcement action if required) within a specified timeframe. This priority will only be awarded with appropriate evidence (e.g. certificates or report from a Council Officer e.g. within Housing Enforcement Department or the Housing and Homelessness Service).

- Moving to release disabled persons and/or adapted accommodation where this has been confirmed by the social housing provider.

- Required to move due to regeneration or demolition of current accommodation where this has been confirmed by the social housing provider.
• Applicant or household member has children being returned from care of a Local Authority, but this is dependent on a change of accommodation. Written confirmation from the social worker will be required.

• Applicant or household member who is a Coventry City Council approved foster carer or adoptive parent and a Social Worker has confirmed in writing that larger or more appropriate accommodation is required to enable the applicant to either foster or adopt. Applicants must be able to show, through an affordability assessment, that they are able to cover the full rental costs of the property. If they cannot, the Registered Provider may not make an offer of accommodation for the property.

5.6.4 Coventry Care Leavers who are assessed as tenancy ready

Applicants who are “Coventry Care Leavers” and have been in the care of Coventry City Council Children’s Services. To be awarded Band 1 priority a Social Worker from Children’s Services has provided written confirmation that a Care Leaver has been assessed as ‘tenancy ready’ and if required has confirmed the ongoing support package for the Care Leaver to assist them in sustaining the tenancy. See Section 5.10 for further information about how ‘tenancy readiness’ will be assessed.

This priority will only be awarded if the young person is not already adequately or suitably accommodated.

This priority can be awarded when the young person reaches 17 years and 6 months old. Once the application is assessed and priority has been agreed the effective date of the application will be back dated to the applicants 16th birthday. This priority will longer apply once the applicant has reached 25 years of age.

5.6.5 Tenants of partner housing providers who are under-occupying a property by 2 or more bedrooms

The demand for larger family sized properties in Coventry is high and therefore in order to ensure the best use of existing housing stock the council wishes to encourage under-occupying households to downsize to smaller accommodation that meets their needs.

To support people to live appropriately sized properties households who are currently under-occupying a social housing property in Coventry by 2 or more bedrooms will be awarded Band 1 priority.

However, households will not be able to bid on properties that are too small for the number of people in their household.

Coventry Homefinder will confirm the number of bedrooms a tenant is occupying with the housing provider in order to award this priority. The number of bedrooms required will be assessed using the bedroom standard (see section 3.4).
5.7 High Housing Need – Band 2

Band 2 is the 2nd highest band within the Coventry Homefinder banding system. This means households in this band have been assessed as having a high housing need. The reasons this priority is awarded are as follows:

5.7.1 Homelessness relief

Priority due to an applicant being owed the homelessness relief duty (under Section 189B of the Housing Act 1996) is awarded by Coventry City Council’s Housing and Homelessness Service where a Personal Housing Plan is in place and the applicant is constructively engaging with the Council’s service to relieve their homelessness.

Applicants will be placed in Band 2 whilst they are owed the relief duty, but their banding may change when that duty comes to an end. If the relief duty ends and does not result in the ‘main housing duty’ being owed for any reason, this may result in either a lower banding award or the applicant no longer qualifying for the Register. All homelessness applicants will be given a written decision under homelessness legislation (Part VII of the Housing Act 1996) informing them of the outcome. They will also have a right to review under the same legislation.

5.7.2 People living in short-term supported accommodation who are tenancy ready

Applicants who are living in short term accommodation (less than 6 months tenure or have been in designated hostel or refuge accommodation and are assessed as being ready to move on to independent accommodation within the next 6 months) in a scheme that has been identified by the Council as contributing towards the objectives of the Coventry Housing & Homelessness Strategy. Such schemes must provide supported accommodation, with active support from the managing agent to assist with issues impacting on the service user such as: benefit support, health issues; employment and training opportunities; budgeting and move on assistance to access settled accommodation in either the private rented or social housing sector.

This priority will only be awarded to households if they are accessing accommodation in such a scheme have been assessed as ‘tenancy ready’ (as described in section 5.10) and have a local connection to Coventry. Applicants that are living in single person’s hostel accommodation will only receive priority for the single household member living in the hostel accommodation. Applicants in hostels do not qualify for overcrowding priority.

5.7.3 Overcrowding 2+ bedrooms

Applicants who believe that they are overcrowded in their current property are assessed against the bedroom standard (see section 3.4). Applicants who are assessed as requiring 2 or more additional bedrooms than their current home will be awarded Band 2 priority.

In assessing this priority Coventry Homefinder will consider:

- The number of bedrooms in the property.
• The number of people in the household, including ages and genders of household members to determine sharing arrangements.

• The length of time that the household have been overcrowded – applicants must have lived in the property for a minimum of 6 months before this priority can be assessed.

• Single person households (over 18) will only be considered for this priority if:
  - They are living with family and their sleeping arrangements are creating overcrowded circumstances.
  - By having their own Coventry Homefinder application and gaining their own tenancy they would alleviate the overcrowding in the family home.

Having a separate application and being awarded this priority would mean that the single applicant cannot also be a household member on another Homefinder application for the whole household, (as set out in section 3.6).

• Applicants requesting an assessment where a household member is pregnant will need to provide the relevant documents confirming pregnancy in order to be considered for a larger property, if this is required. Once this is verified the number of bedrooms required will be amended on the application after 26 weeks of pregnancy. Only when the baby is born can the applicant then request priority for overcrowding based on the bedroom standards.

Coventry Homefinder will require confirmation from the current landlord regarding the number of bedrooms in the property to award overcrowding priority.

5.7.4 Tenants of partner housing providers who are under-occupying a property by 1 bedroom

To support people to live in appropriately sized properties households who are currently under-occupying a social housing property in Coventry by 1 bedroom will be awarded Band 2 priority. However, households will not be able to bid on properties that are too small for the number of people in their household.

Coventry Homefinder will confirm the number of bedrooms a tenant is occupying with the housing provider in order to award this priority. The number of bedrooms required will be assessed using the bedroom standard (see section 3.4).

5.8 Medium Housing Need – Band 3

Band 3 is the 3rd highest band within the Coventry Homefinder banding system. This means households in this band have been assessed as having a medium housing need. The reasons this priority is awarded is as follows:

5.8.1 Homelessness Prevention

The homelessness prevention duty (under Section 195 of the Housing Act 1996) is awarded by Coventry City Council’s Housing and Homelessness Service where a Personal Housing
Plan is in place and the applicant is constructively engaging with the Council’s services to prevent their homelessness.

Prevention duty cases will be subject to continuous assessment and the duty can be ended at any point if the relevant circumstances arise under the legislation. If there is no longer a threat of homelessness, the application will be reassessed and may be removed from the Housing Needs Register if the applicant no longer qualifies to remain on it or moved to a lower band depending on their individual circumstances.

5.8.2 Homeless households who do not have a priority need

Homeless Households who do not have a priority need – Applicants who are assessed by the Housing and Homelessness Service as being eligible and homeless but who do not have a priority need under Part VII of the Housing Act 1996.

5.8.3 Housing need due to health and/or social care difficulties

Applicant or household member who has health or social care difficulties which make it difficult but not impossible to make full use of their current accommodation. Examples include (this is not an exhaustive list):

- Applicant or household member who has learning disabilities and/or mental health difficulties and the type and/or location of their current property is having some impact on their on their day to day life and the management of their health.

- Applicant or household member who need to move to a particular locality in order to give or receive a demonstratable level of care or support, either practical or emotional support to meet a physical or mental health need. Evidence will be required to show this level of support is needed and that without that support you or the person you are supporting, would have significant problems in their daily lives. Evidence will also be required to show how a move would greatly cut or ease the traveling time needed to give or receive support. Priority will be awarded to the person who is most easily able to move.

5.8.4 Housing need relating to Social, Welfare and Hardship issues

There are some circumstances where the provision of alternative accommodation is required due to the social and welfare needs of the household. These cases will all be assessed according to their own individual circumstances and priority will be considered based on the impact of the present housing on the needs of the household members.

Examples of Medium Housing Need due to Social and Welfare priority include:

- Applicants who are experiencing ongoing and unresolved issues due to harassment, abuse or neighbourhood disputes. Award of this priority may require appropriate evidence from a landlord, Police, other statutory body or support agency where it is demonstrated that the issues are directed at the house (rather than general ASB issues the local area) and it would beneficial for the household to move from their current accommodation.
• Existing social housing tenants who need to move to Coventry to take up a job offer or to move closer to work under the Governments Right to Move initiative where applicants would otherwise be deemed to suffer undue financial hardship (assessed in conjunction with relevant guidance).

• People needing to move to a particular area of Coventry where hardship (financial, educational or work related) would be caused to themselves or others if they do not move. For example, this might include the need to move to undertake a prolonged period of education or training, where this is linked to employment and failure to undertake the training would lead to the loss of employment. This priority will not be awarded purely because an applicant loses their employment. Coventry is geographically compact with good transport links; therefore, this priority reason would only be awarded in exceptional circumstances.

5.8.5 Overcrowding – requires 1 additional bedroom

Applicants who believe that they are overcrowded in their current property are assessed against the bedroom standard (see section 3.4). Applicants who are assessed as requiring 1 more bedroom will be awarded Band 3 priority.

In assessing this priority Coventry Homefinder will consider:

• The number of bedrooms in the property.

• The number of people in the household, including ages and genders of household members to determine sharing arrangements.

• The length of time that the household have been overcrowded – applicants must have lived in the property for a minimum of 6 months before this priority can be assessed.

• Single person households (over 18) will only be considered for this priority if:
  – They are living with family and their sleeping arrangements are creating overcrowded circumstances.
  – By having their own Coventry Homefinder application and gaining their own tenancy they would alleviate the overcrowding in the family home

Having a separate application and being awarded this priority would mean that the single applicant cannot also be a household member on another Homefinder application for the whole household, (as set out in section 3.6).

• Applicants requesting an assessment where a household member is pregnant will need to provide the relevant documents confirming pregnancy in order to be considered for a larger property, if this is required. Once this is verified the number of bedrooms required will be amended on the application after 26 weeks of pregnancy. Only when the baby is born can the applicant then request priority for overcrowding based on the bedroom standards.

Coventry Homefinder will require confirmation from the current landlord regarding the number of bedrooms in the property to award overcrowding priority.
5.9 Housing Need – Band 4

Band 4 is the 4th highest band within the Coventry Homefinder banding system. This means households in this band have been assessed as having a housing need, but this housing need is lower than those applicants in higher bands. The reasons this priority is awarded is as follows:

5.9.1 Housing Need

Applicants with a local connection to Coventry and they have a housing need for alternative housing but have been assessed as having lower priority than those applicants with other housing needs that meet the criteria for a higher banding.

Whilst not exhaustive, the following list explains some of the reasons why an applicant could be assessed as having a housing need under this policy:

- Newly forming households – applicants living with friends or family wanting their own accommodation.
- Newly forming households – applicants currently living apart who want to live together.
- Newly forming households – applicants currently living together who want to live separately (e.g. due to relationship breakdown).
- Applicants who are or could potentially experience financial difficulty if they remained in their current accommodation and therefore need to move to more a accommodation. For example, where an applicant’s circumstances have changed, and they are struggling to pay the rent and other household bills in their current accommodation.
- Applicants who are currently living in a property in disrepair (e.g. the property currently has identified hazards (Category 2 Hazards under the Housing Health and Safety Rating System), the disrepair cannot be rectified within a reasonable period and the disrepair of the property is their only identified housing need.
- Intentionally Homelessness Households - applicants who have been assessed by the Council’s Housing and Homelessness Service as having, by reason of act or omission, caused their homelessness intentionally until there is a change in their circumstances.
- Applicants who are (Care Leavers or people living in designated hostels or other type of short term supported accommodation but who are not currently assessed ‘tenancy ready’) at point of application to the housing register will be placed in the housing need preference banding until they can demonstrate they are ready for independent living and will be able to maintain a tenancy long term. (See section 5.10)
5.9.2 Housing need but no local connection

Applicants who have an identified housing need but have no connection to Coventry as described in section 4.3. An exemption to this would be applications from people fleeing domestic violence, hate crime or any other form of harassment and need to move to alternative accommodation who would be placed in either band 1 or band 3 depending on their individual circumstances. This decision will be made by a Senior Housing Officer, Housing Operations Manager or Housing Capacity Manager.

5.10 Definition of Tenancy readiness

It is a requirement that applicants nominated for social housing can demonstrate to the relevant Registered Provider they are able to maintain and sustain a tenancy. Therefore, tenancy readiness is defined as the applicant:

- Understands their responsibilities as a tenant to adhere to their tenancy agreement.
- Has the financial resources to pay the rent and other household bills.
- Is able to access and engage with formal (professional support) or informal support (family or friends) where this is required.

Tenancy readiness can be demonstrated in several ways including:

- Completion of a pre-tenancy course (e.g. Crisis renting ready or similar).
- Written confirmation from a social worker or support worker the applicant is ready to move out from supported or hostel accommodation.
- Ongoing support needs have been assessed and, where appropriate, a support plan is in place and the applicant is actively engaged with the support plan.

Once tenancy readiness has been confirmed and accepted by Coventry Homefinder. Applicants will be moved into the banding related to their housing need. (e.g. Coventry Care Leavers in Band 1 and applicants living in hostels or supported accommodation – Band 2).

5.11 Reduced Preference Band

The Reduced Preference Band is the lowest band on Coventry Homefinder, and it is very unlikely that applicants placed in this band will receive offers of housing. An applicant being placed in Reduced Preference Band could occur at any stage of the Housing Register process (e.g. at application or offer stage) and will be subject to the right of review by the applicant.

There are a number of reasons that an applicant can be placed in reduced preference as follows:

- Households where the main housing duty has ended due to a refusal of one suitable offer of accommodation.
- Reduced priority status due to unacceptable behaviour or rent arrears (that are not serious enough to disqualify you from the housing needs register).
• Reduced priority status due to not actively bidding for suitable housing to meet your assessed housing need in a 6-month period (applicants in bands 1 and 2 only).

• Applicant (other than homeless household) has refused 3 suitable offers of housing.

5.11.1 Reduced Preference Band – Notification of banding and/or change of banding

If the decision to place a household in the Reduced Preference band occurs at application stage, the applicant will receive a notification of their banding and the reason for that decision. The applicant will receive information and advice where it is relevant to their application. The applicant will be able to seek a review of this decision within 28 days of the notification date.

If the decision to place a household in the Reduced Preference band occurs at offer stage, the relevant housing provider (Housing Association) will notify the Coventry Homefinder Team and outline reasons why the applicant should be placed in the Reduced Preference Band. Following any additional checks, the Coventry Homefinder Team will notify the applicant of their decision and provide information and advice to the applicant on the steps they need to take in order to return to their housing need band. The applicant will be able to seek a review of this decision within 28 days of the notification date.

If an applicant is placed in reduced preference at offer or any other stage other than application, they retain their original registration and/or effective date for their identified housing need band once the issue that has reduced their preference has been resolved.

5.11.2 Reduced Preference Band – Change of circumstances/request for reassessment

Applicants who are assessed as meeting the reduced priority banding criteria will have the opportunity to apply for their banding to be re-assessed, if their circumstances have changed. The following list provides details of possible changes in circumstances:

• The debt is reduced to below £1,000 pounds and the applicant has entered and adhered to a repayment plan to reduce their arrears.

• That there have been no further reported incidents of antisocial behaviour 6 months prior to the applicant applying to have their banding re-assessed.

• That a period of 6 months has passed since the applicant was placed in reduced preference due to non-bidding activity.

• That a period of 6 months has passed since the applicant was placed in reduced preference due to the refusal of three offers of accommodation. Please see section 6.12 for the definition of a refused offer.

• A homeless household who refused a suitable offer of accommodation will need to demonstrate they have had a change of circumstances since their homelessness application was closed to request a re-assessment of their housing register application.

Please note this list is not exhaustive and each re-assessment will be on an individual basis.
All/Some applicants will need to complete a change of circumstances form to have their banding re-assessed. Alongside completing the change of circumstances form applicants may be required to provide supporting evidence.
Section 6 – The Choice Based Letting Scheme

6.1 The Choice Based Lettings Model

Coventry Homefinder is a choice-based lettings scheme. This allows applicants to express an interest in available properties, which are advertised each week. Expressing an interest in a property is known as ‘bidding’ or ‘placing a bid’.

There are some circumstances in which this will not apply, and the Council will either restrict access to bidding (restricted bidding), make bids on behalf of an applicant (assisted/auto bidding), or make direct offers. The Council reserves the right to do this at any time in order to effectively manage allocations of homes against housing need.

6.2 The Bidding Cycle

Applicants may register an interest (bid) for up to three homes every week. The applicant bidding cycle will run from Monday morning (00.00am) to Sunday evening (11.59pm). Properties can be advertised on any day (Monday to Friday) and will be open for ‘bidding’ for 7 calendar days, (with the exception of the Christmas period when the bidding cycle usually runs for two weeks).

After the bidding period has ended those applicants that have expressed an interest in a property are shortlisted in line with this Policy. These processes are explained in more detail in this section.

The results of each bidding cycle are published on the website, showing the number of bids on each property, and the band and effective date and/or registration date of the successful applicant. This shows the priority of the successful applicant and how long they have had that level of priority and makes the system clear and easy to understand.

6.3 Who does and doesn’t have choice?

Band 1

Applicants in Band 1 where the Council has accepted the ‘main housing duty’ under homelessness legislation (Housing Act 1996, Part 7) will not have access to Choice Based Lettings at any time. Bids will be made for them by a member of the Housing and Homelessness Service. This is to ensure that the duty to secure an offer of suitable settled accommodation is complied with as soon as possible. If you are owed the ‘main housing duty’ under homelessness legislation you will have been informed of this in writing.

All other applicants in Band 1 will ordinarily have access to Choice Based Lettings and will be able to register an interest in 3 suitable properties each week (bid). Applicants are expected to bid on the all available properties that are suited to their needs. If you haven’t bid for a suitable property for 6 months or more and there were suitable properties available in that time, your application may be placed in the Reduced Preference Band. See Section 5.11 for further information.
Band 2

All applicants in Band 2 will have access to Choice Based Lettings and will be able to register an interest in 3 suitable properties each week (bid). Applicants are expected to bid on all available properties that are suited to their needs. If you haven’t bid for a suitable property for 6 months or more and there were suitable properties available in that time, your application may be placed in the Reduced Preference Band. See Section 5.11 for further information.

Band 3 and Band 4

All applicants have access to Choice Based Lettings and will be able to register an interest in 3 suitable properties each week.

Reduced Preference

Depending on the reason an applicant is currently in the Reduced Preference Band will depend on whether they have access to the choice-based lettings scheme. Applicants in Reduced Preference due to behaviour or rent arrears can still bid for properties. Applicants who refused an offer of accommodation under the homelessness legislation will also still have access to the choice-based lettings scheme. It is less likely these applicants will be shortlisted for offers (as priority will be given to the applicants in higher bands).

Applicants who are currently in the Reduced Preference band due to the maximum refusal of offers or non-bidding activity will not have access to the choice-based lettings scheme to bid for properties until they have been in the reduced preference band for 6 months and returned to their housing need band. Applicants will retain access to their account in order to update their details, complete their annual review or complete a change of circumstances form.

6.4 Direct Lets

In exceptional circumstances we may make you a direct offer of accommodation. These can include where:

- A property is specifically adapted, or can be adapted for the applicant, joint applicant or a member of their household (See section 6.11).
- The Council retains the right to make direct offers of accommodation to those households owed a statutory homelessness duty.
- Urgent re-housing where a specific location is required.
- A specific property would meet an applicant’s very specific needs.
- A property is required by a Registered Provider as an emergency move for a current tenant, for example due to fire/flood/gas explosion.
- An agreement has been made with a supported housing provider.

6.5 How properties are advertised

Available properties are advertised on the Coventry Homefinder website.
Vulnerable customers who cannot access the system and do not have any other support available to them can contact the Coventry Homefinder Team to arrange assistive bidding and/or auto bidding. Customers can also bid for properties via an automated telephone line.

6.6 How properties are labelled

Each of the Registered Providers has responsibility for preparing the property description and advertising their vacancies on Coventry Homefinder.

Adverts will be clearly labelled to show the main property features, and the types of households that are eligible to bid for the property. A photograph must be included with the advert.

All properties advertised will include details of:

- The landlord of the property.
- The location of the property (including the street name, area and a location map).
- The type of property (house, flat etc).
- The number of bedrooms that the property has, the minimum and maximum number of occupants.
- The rent amount and any other relevant charges.
- The types of households that can bid for the property (for example, any age restrictions and any family requirements).
- Whether priority will be given to specific groups such as current social tenants.
- Tenancy type (For example, Starter tenancy, Assured or Fixed Term).
- The mobility assessment category of the property and details of any specific adaptations that have been made to the property.
- Whether adaptions can be made to the property.
- Date bidding will close for the specific property.
- Reference to any local lettings criteria/policy (applicants are advised to contact the advertising Registered Provider for more details prior to making a bid).

Applicants must consider all of these factors carefully when deciding whether to express an interest in (bid on) a property.

6.7 How to Place a Bid

Applicants must express an interest in a property by placing a ‘bid’ in order to be shortlisted and considered for an allocation of that property.

Applicants may express an interest (‘bid’) on up to three properties in each bidding period.

In order to express an interest in a property that is being advertised, the applicant can use one of several methods:
• Online bidding – applicants can log on and see which properties they are eligible to bid on. Bids can then be placed by following the on-screen instructions.

• Telephone bidding – bids can be placed by telephone. Applicants will need their registration number, password and the reference number/s of the properties they wish to bid for.

• Assisted bidding – where an applicant has given consent, bids may be placed on behalf of an applicant by a support agency. Vulnerable applicants who cannot access the system themselves and have no other support available to them, can also request that bids are placed on suitable properties by the Coventry Homefinder Team. Applicants should contact the Team to request this service.

Applicants can withdraw a bid at any point during the bidding period (Monday to Sunday) and may then place that bid on an alternative property.

6.8 How Applicants are Shortlisted

The housing provider (Housing Association) who has advertised the property is responsible for the shortlisting process.

At the end of each bidding period, expressions of interest for a property (bids) are shortlisted in the following way:

• Expressions of interest (bids) for properties will be placed in the order of priority band – Band 1 highest priority, then Band 2, Band 3, Band 4 and Reduced Preference.

• If two or more applicants from the same band have expressed an interest for the same property, the ‘effective date’ that they entered their current band will be used to determine the higher priority (see section 3.8). The applicant with the earliest effective date will be shortlisted first.

• If two or more applicants with the same band and the same effective date have expressed an interest in a property, the date of original registration will be used.

Registered Providers may advertise up to 10% of their available properties with priority given to their own current tenants. This will mean that the shortlist is arranged as described above, but they may prioritise their own tenants above other applicants within the shortlist.

There may be occasions that Registered Providers do not offer properties to the highest shortlisted applicant, for example if they do not meet the individual Register Provider allocations policy or any local lettings criteria. A reference to local lettings criteria will be made in the property advert if they are to be applied.

Properties that have been adapted for people with disabilities may be allocated based on the ‘best fit’ of requirements of bidders rather than in shortlist order – this is described in more detail in section 6.11.

Please note:
• Expressions of interest are shortlisted at the end of the bidding period based on priority banding and the effective/registration date of all applicants that have expressed an interest. There is no advantage to placing bids early in the bidding period.

• When applicants express an interest in a property, they are informed of their current position in the shortlist. However, as more people place bids throughout the bidding period, this position may change. Applicants are advised to check their bid positions near to the end of the bidding period for each property, in order to make best use of their bids.

6.9 Bids that may be overlooked (Skipping)

In some situations, a property will not be offered to the highest ranked applicant who has expressed a preference for it. Shortlisted applicants may be overlooked for a number of reasons. The criteria used when an applicant is overlooked for an offer of accommodation will be contained within the individual Registered Provider’s Housing Allocations Policy.

The list below is not an exhaustive list and is a general guide as each case will be assessed individually and the personal circumstances of each applicant will be taken into account.

• If there is evidence which had not been identified at initial application, that an applicant or a member of their household has committed anti-social behaviour. In this case, the application will be reviewed and may be deemed non-qualifying due to seriousness of unacceptable behaviour or placed in the Reduced Preference Band.

• If there is evidence which had not been identified at initial application, that an applicant owes money to a Registered Provider partner, Local Authority or private sector landlord due to rent arrears, sundry debts, damage to property or any other identified costs. In this instance the application will be reviewed and may be deemed non-qualifying due to the significant amount of rent arrears or placed in the Reduced Preference Band.

• If the Individual Registered Provider considers that the applicant or any member of their household has the financial means to resolve their own housing situation in accordance with their allocations policy. Having regard to income, equity, savings, and the price of buying or renting a home privately. In this instance the application will be reviewed and may be deemed non-qualifying due to the amount of household income or savings.

• An applicant in Reduced Preference who cannot demonstrate a change in their circumstances since they were placed in Reduced Preference due to the fact that they or a member of their household has displayed unacceptable behaviour or have current or former rent arrears;

• The applicant or a member of their household has assaulted or harassed an employee or agent of one of the partner Registered Providers or Coventry City Council;

• The applicant cannot demonstrate that they can afford to pay the rent. Consideration will be given to the welfare benefits that may be paid to the applicant;
• The applicant bids for a property and their household details do not match the household criteria set out in the advert;

• The applicant or their household do not meet a local lettings criteria that was specified on the advert;

• The advert specified that priority will be given to current tenants of that Registered Provider, and the applicant is not currently a tenant of that organisation;

• The property is specialist or has been adapted and the applicant does not require these adaptations;

• The applicant requires specific adaptations that cannot reasonably be provided in that property;

• If the applicant has already bid for another property and this has been offered to them

In the first instance, Housing Providers will notify the applicant through their Coventry Homefinder Account when a bid has been skipped, and the reasons for the bid being skipped. This will include details of how the applicant can resolve any issues to prevent further skipped bids (if possible). Depending on the reason applicant was ‘skipped’ the Housing Provider may contact the Coventry Homefinder Team to request the applicant is placed in the Reduced Preference Band or that the qualifying criteria are reassessed. See section 5.11.

Applicants may then continue to be skipped until they can demonstrate that the reason for skipping has been resolved (for example, if the applicant has been skipped due to rent arrears, they may have to demonstrate that the arrears have been paid off or a re-payment plan has been adhered to for a certain period of time).

6.10 Notification that your bid has been overlooked (Skipped)

If the applicant’s bid is overlooked and the individual Registered Provider has requested that the applicant be placed in the Reduced Preference Band a message will be sent to the applicants Coventry Homefinder Account to say their application has been suspended pending a confirmation by the Council’s Housing and Homelessness Service as to whether the applicant should be placed in Reduced Preference under this policy. Once the Council has made this decision, another message will be sent within the Homefinder system to confirm the outcome. If an applicant has been placed in Reduced Preference, they can request a review of this decision within 28 days.

For all other reasons a bid might be overlooked a message will be sent via the Coventry Homefinder System to the applicant by the Registered Provider to notify them their bid was overlooked and the reasons why.

The decision to overlook a shortlisted bid or any reason that is not linked to the Reduced Preference criteria is taken by the partner Registered Provider and it is the individual criteria/policy for each Provider that will be applied in all cases of allocating a property or skipping a bid. Appeals against a decision to skip a bid should be addressed to the Registered Provider that made the decision.
6.11 Adapted properties

As part of the application process, applicants will be asked whether they require an adapted, specialist or purpose-built accessible property. Applicants will also be asked whether they currently have any mobility issues in order for their housing need to be assessed. This may involve a referral to the Council's Adult Social Care Department.

Applicants with needs requiring adapted properties must have an assessment from an Occupational Therapist to determine the type of property or adaptations required; this information will be added to their Coventry Homefinder Account. The assessment will include but not limited to the following information:

- Applicants specific housing need
- Specific location required (if any)
- Description of the type of property required
- Restrictions in the location – e.g. ground floor
- Specific adaptations required

The occupational therapist assessment will be arranged by the Housing and Homelessness Service. Accommodation for households that need specific adaptations is in high demand with limited supply available. Therefore, an outcome of the occupational therapist assessment could be that aids and adaptations could be provided to the applicant’s current accommodation rather than be registered for an adapted property.

In order to make the best use of available accommodation that is either a purpose-built disabled persons property or has substantial adaptations installed, these will be advertised on Coventry Homefinder to support the identification of suitable applicants. Whilst all applicants can bid for these properties (apart from purpose build disabled persons accommodation); priority will be given in the first instance to those applicants requiring an adapted property, secondly to applicants who require adaptations to a property and only following this to applicants who require general needs housing.

The property will be allocated on the basis of ‘best fit’ of an applicant’s specific requirements and how the property is adapted in consultation with an Occupational Therapist (where required). This may mean that offers made are not prioritised in order of priority band or effective date. In the event two or more applicants bid for the property with similar needs, the property will be allocated by priority band and/or effective date.

For applicants that require adaptations who are shortlisted for an adapted property, the landlord will consider whether it is reasonable to provide adaptations in the property, in conjunction with an Occupational Therapists (where required) to ensure that it is suitable for the households needs.

Properties are categorised as below:

<table>
<thead>
<tr>
<th>Mobility Assessment Category</th>
<th>Category description</th>
<th>Applicants assessed as being eligible for these categories</th>
</tr>
</thead>
</table>

Page 98
<table>
<thead>
<tr>
<th>Mobility Assessment Category</th>
<th>Category description</th>
<th>Applicants assessed as being eligible for these categories</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Category 1</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Purpose built wheelchair housing</td>
<td>Disabled persons Bungalow, flat or house which has been adapted to be fully wheelchair accessible on the ground floor.</td>
<td>People with severe disability who are unable to stand or walk unassisted i.e. people who need to use a wheelchair both indoors and outdoors</td>
</tr>
<tr>
<td><strong>Category 2</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Partly Adapted House</td>
<td>House with a through floor lift or stair lift Access to the property will be level, ramped or step lift Other adaptations may include changes to bathroom/kitchen</td>
<td>People who: may be a wheelchair user outdoors or use walking aids are not able to climb stairs and need a through floor lift or stair lift require assistance to access bathrooms/kitchen have dependent children (under 16) in the household</td>
</tr>
<tr>
<td><strong>Category 3</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Partly Adapted Flats</td>
<td>Flats with level access into the property and with some adaptation(s) This would include adapted flats in high rise blocks which have a communal lift</td>
<td>People who do not use a wheelchair indoors but have mobility needs and cannot climb stairs or steps</td>
</tr>
</tbody>
</table>

A property with a level access shower and/or wet room combined with a stairlift would be considered by most Registered Providers as a partly adapted property.

A property with a level access shower and no other adaptations would not be considered an adapted property and would normally be advertised as general needs housing.

### 6.12 Viewing Properties and Receiving Offers

All applicants, other than those assessed as statutorily homeless and waiting for an offer to discharge the main housing duty will be contacted by the Registered Provider if they are successful in bidding for a property. All Registered Providers will telephone the applicant on all contact numbers provided and where an email address is provided they will attempt contact by email.
If the Housing provider is unable to contact within 24 to 48 hours the successful bidder may be skipped and a viewing will then be arranged with the next successful bidder in the shortlist. It is therefore important that the applicant ensures that all contact details on their application are kept up to date (see section 7.1).

The Housing provider will arrange for the successful bidder to:

- Complete a pre-tenancy assessment
- View the property at a jointly agreed time.

Offers will be made based on the outcome of the viewing and pre-tenancy checks in the individual allocation policies of the Registered Providers. Tenancy checks may include:

- A discussion about the applicants housing history and any support needs for themselves or a member of their household
- An assessment of household income to ensure that the tenancy can be afforded;
- Provision of documents confirming the identity of the household members
- Police checks if a declaration of conviction or antisocial behaviour has been made

Once these checks have been completed and both parties are happy to continue with the offer of a property, the Housing Provider will arrange for the applicant to sign a tenancy agreement, at which point the keys to the property will be provided. As part of the pre tenancy process, applicants may be required to pay rent in advance.

**Multi-Views**

Some Housing Providers will arrange a multi-view for a property. A multi-view is a single viewing but a range of applicants in the top shortlisted positions will be invited to view the property at the same time.

The offer of the property will still be made first to the applicants in order of their shortlisted positions, however it serves to confirm those who are genuinely interested and will make the process quicker in letting the property.

**6.13 Multiple Refusals (refused offers of housing)**

Applicants who refuse three offers made to them following successful bids on the Choice-based Lettings Scheme may have their application moved into the Reduced Reference Band and will be informed of this in via a message in the Coventry Homefinder System. An applicant will be required to contact Coventry Homefinder within 28 days to show that the refusals were reasonable in order for their application to remain in their housing need band and for this to be agreed by the Housing and Homelessness Service. If they do not or their reasons are not agreed to be reasonable the application will be placed in Reduced Preference for a period of 6 months or closed if the application is not renewed.

Coventry Homefinder will consider the individual circumstances of each case.

Not responding to contacts made regarding the offer of a property, failing to attend a viewing or refusing a property following a viewing will all be considered to be a refusal.
It will not be considered reasonable to refuse a property on grounds that were made clear in the property advert (for example, the location of the property) unless there are exceptional circumstances. Applicants must consider all factors carefully when deciding whether to express an interest in (bid on) a property.

6.14 Local Lettings Plans

Partner Housing Providers may agree local lettings plans for managing the allocation of particular properties in certain areas. Examples include:

- Restricting the age ranges of certain tower blocks
- Limiting the number of children in a particular area to create sustainable communities
- Lessening the impact of anti-social behaviour to create sustainable communities

Reference to any local lettings plans will be made in the property advert and applicants are advised to contact the advertising Registered Provider for more details.

Some Housing Providers have restrictions on the maximum income and savings an applicant can have to be eligible for their properties because of their charitable status (in addition to the qualifying criteria described in section 4.3). When considering an applicant for an offer of accommodation they will check the details of income and savings and notify the applicant in writing if they are not going to make the offer of accommodation. If the applicant does not agree with the decision the applicant has the right to request a review of their decision from the Housing Provider.

6.15 Age Restricted Properties

Registered Providers have certain properties that are ‘age restricted’. This refers to properties that have a minimum age set for tenancies of a property or group of properties. The details of any restrictions relating to age will be included in the advertisement details.

Most Housing Providers will only let bungalows to people over the age of 55 or over the age of 60, if an age restriction applies, it will be clearly stated in the advertisement details. Some Registered Providers will consider applicants who are younger than the age restriction if the applicant has a health or social care need for bungalow accommodation.

6.16 Eligibility for Houses

Registered Providers may restrict the allocation of houses to households that have children under the age of 16. Households made up entirely of household members aged 16+ would not normally be considered for the allocation of a house.

6.17 Properties excluded from Coventry Homefinder

Some properties are excluded from being advertised on Coventry Homefinder; in these instances, the property will not be advertised; these include but are not exclusive to:

- ‘Housing with Care’
These properties are generally in schemes specifically for older people with a range of care or welfare needs. Access to these properties generally follows an adult social care assessment. Further details can be gained from Adult Social Care Initial Contact Team on 024 7683 3003

- Hostel accommodation and other ‘supported housing’
  Supported accommodation is not provided through Coventry Homefinder.

### 6.18 Garages

Garages owned by Citizen (formerly WM Housing and Whitefriars Housing Group) are advertised through the Coventry Homefinder website and applicants can register for garages as well as for social housing; however, the allocation of garages is not subject to legislation relating to allocations of social housing and is not covered by this Policy.

Applicants should contact Citizen directly for details of their policy on letting garages.

### 6.19 Feedback/Lettings Results

Applicants are informed of their current shortlist position as they bid for properties but are also notified that this may change throughout the bidding period as other applicants place bids. The shortlist position of individual applicants for previous bidding periods is also available on their own ‘Bid History’ page once the applicant has logged in.

Following the bidding period, information is published on the Coventry Homefinder website showing the outcome of previously advertised properties. This will include the number of bids received, and the band and effective date of the successful bidder. Direct Lets made outside of the Homefinder Policy (see section 6.4) will also be listed for information only.

This information will allow the applicant to assess the potential likelihood of them being allocated a property in light of their own priority banding and effective date. The applicant will then be able to make a more informed decision as to whether they want to consider other property types, other areas of the city, or other housing options.
Section 7 – Management of the Scheme

This section contains general information on how the Housing and Homelessness Service which includes the Coventry Homefinder Team manages the Housing Needs Register, including how active applications are administered on an ongoing basis.

7.1 Keeping your Application Up to Date (Changes in your circumstances)

It is the responsibility of the applicant to ensure that their application is kept up to date.

It is important for applicants to ensure that any changes in personal circumstances, household members, contact details or household needs are updated in a timely manner. This ensures that:

- Applicants are able to bid on appropriately sized properties
- Applicants are provided with the correct priority for their household needs
- Housing providers are able to contact applicant quickly to make an offer of accommodation

Applicants can update their contact details by logging in to Coventry Homefinder Account.

Where there has been a change in their circumstances the applicant will need to complete an online form. This can be done via the Coventry Homefinder website. The list below is not an exhaustive list but a change of circumstances can include:

- If anyone included on the application moves out
- Family size, for example if you have another child
- If you want to add any other person to the application
- A change in income or capital
- If you no longer have recourse to public funds
- The assessed housing needs of the applicant or a household member has changed, and the applicant wishes to have their banding re-assessed. (Supporting information/evidence may be required)
- An applicant is currently in the reduced preference band and requests a re-assessment of their banding
- Any other circumstances where the applicant believes a re-assessment is required

Vulnerable customers who cannot access the system and do not have any other support available to them can contact the Council’s Customer Service Centre for assistance to update their details or complete a change of circumstances form.
7.2 Cancelling/Closing Applications

An application will be cancelled/closed in the following circumstances:

- If the applicant has requested that the application is cancelled/closed.
- The applicant has not responded to the annual review message within the specified timescale (see section 7.3).
- If the applicant household has been housed through Coventry Homefinder.
- If the applicant household has been otherwise housed in any suitable social housing for example as a result of a managed move or out of the Coventry area.
- If the applicant household has undertaken a ‘mutual exchange’ with another social housing tenant.
- The applicant stops being eligible to stay on the register for any reason, including moving to different accommodation where they do not have a housing need.
- The applicant is found to have provided false information (or withheld relevant information) relating to their housing application (see section 3.9).
- The applicant is found to have been guilty of unacceptable behaviour that would make them ‘unsuitable to be a tenant’ and therefore they do not meet the qualifying criteria for registration (see section 4.3).
- The applicant’s financial circumstances have changed, and they currently have over £50,000 in income and/or assets
- The applicant’s housing circumstances have changed, and they no longer have an assessed housing need
- An applicant has not provided the required information to assess their housing application within 28 days.
- An applicant has refused an offer of accommodation as a statutorily homeless household and they no longer qualify to join the housing register.

If there are joint applicants, both must tell us in writing that they want us to remove the application. If this does not happen, and only one applicant tells us they want us to remove it, the application will continue in the name of the other applicant alone. The Council may remove the application for both joint applicants for any of the above reasons.

7.3 Keeping the Register Up to Date (Annual Renewals)

All applicants are required to review their application each year to ensure that their details are correct and to confirm that they wish to remain on the Coventry Homefinder register.

The annual renewal process takes place on:

1. The first anniversary of their initial application date; and then
2. Subsequently the anniversary of their renewal date each year.
3. Where an applicant has been accepted as homeless by Coventry City Council their renewal date will be amended to a year from date the homelessness decision was made.
Applicants will receive a notification that their application is due for renewal on their Coventry Homefinder account and by email, if an email address has been provided on their application. It is the applicant’s responsibility to ensure that they respond to the notification and carry out the review. Applicants will have 56 days to review their application – if this is not completed then their application will be closed.

Only in exceptional circumstances, where the applicant has demonstrated that they have been unable to review their application due to circumstances beyond their control (for example, due to prolonged hospitalisation), will the application be reopened by the Coventry Homefinder Team.

If an application has been closed following the 56-day period and there are no exceptional circumstances, the applicant must make a fresh application. This will result in a new registration date and a new effective date.

Where the Homefinder Team have been informed that the applicant is vulnerable, cannot use the system and does not have any other support available to them, the Homefinder Team will contact the applicant directly using other contact details provided.

Computers are available in the Customer Service Centre and public Libraries to facilitate this online renewal process for applicants who don’t have readily available access to the internet. Support is also available from various advice agencies in the city. For further details go to https://www.adviceservicescoventry.org.uk/

7.4 Exceptional Circumstances

Allocations of social housing in Coventry by partner Registered Providers (apart from some Midland Heart properties advertised via Homesdirect) will be through the Housing Register (Coventry Homefinder) in accordance with the provisions of the Allocations Scheme as detailed in this Policy. For some applicants, there may be exceptional circumstances that create housing needs which are not recognised in the Coventry Homefinder Policy. In such instances, the Head of Housing and Homelessness or in their absence the Housing Operations Manager or Housing Capacity Manager will have delegated authority to make decisions, as he/she considers appropriate, and these will be fully documented.

Exceptional circumstances may also include the requirement for existing housing stock to be amended or altered to facilitate the needs of the household. This may have specific resource implications.

7.5 Deliberately worsening circumstances

In assessing applications for social housing under this policy, in our decision making we will consider whether you have deliberately made your housing situation worse, either by your own action, an action by a member of your household or inaction, to increase your housing need and consequently improve your changes of re-housing through the register.

If we decide you have made your housing situation worse, you will remain in your original housing need band (before the deliberate action or inaction) for a period of 6 months before your housing needs can be re-assessed. An applicant will have the right to request a review of this decision.
7.6 Notification of decisions and a right to review

Notification of decision and a right to review – the Choice Based Lettings Scheme

Under Part 6 of the Housing Act 1996 applicants for housing have the right to request a review of certain decision made about their Housing Needs Register application. The review must be undertaken by an officer more senior to the one who made the original decision.

The following are examples of decisions that can be reviewed under this Policy:

- the decision that an applicant is not eligible to join the Register.
- the decision that an applicant does not qualify to join the Register.
- the housing need band assessment.
- the decision to cancel and remove an application from the Register.
- the decision to place an application in the reduced preference band.
- the decision for an application to remain in the reduced preference band following a change of circumstances request from the applicant.
- the decision that an applicant has deliberately worsened their circumstances band following a change of circumstances request from the applicant.
- the facts that have or likely to be taken into account when considering making an offer of housing.

Coventry Homefinder will notify the applicant via the Coventry Homefinder system of any decisions that are made concerning an applicant’s eligibility, qualifying requirements and housing need band assessment. The notification to the applicant of the decision will also contain details regarding their rights to request a review if they disagree with the decision made.

The following procedures will be used in administering the review process:

1. Applicants will be notified that they will have 28 days in which to request a review from the date of the notification of the decision.

2. Requests for a review should be made in writing (including email) by the applicant or a person nominated by the applicant in writing as acting on their behalf; the applicant should provide details and further independent information to support their disagreement with the decision that has been made.

3. The review will be considered on the basis of Coventry City Council’s Choice Based Lettings Scheme and the application of the criteria for eligibility and qualifying; the priorities included in the scheme and the categories of accommodation defined in the policy; and any additional information the applicant is able to provide that may be relevant to the decision being made.
4. Reviews will be completed, with a full written response to the applicant detailing the outcome of the review within 56 days. In exceptional circumstances, the applicant will be notified of any extension to this deadline and the reasons for this.

**Notification of decision and a right to review – the offer of housing**

Where an applicant has ‘bid’ and has subsequently been skipped for that property, the applicant has a right to raise a complaint through the housing providers’ complaint process if they believe it was unreasonable for their bid to be skipped with the outcome of no offer being made.

The applicant is required to make written representation to the Housing provider within 28 days of them being skipped for the property; The applicant would expect to receive a response within 56 days of the complaint being raised.

**7.7 Complaints**

A request for a review is in effect an appeal against a decision which has been made with which you do not agree. A complaint is different – it is an expression of dissatisfaction with the level of service received, or the way it was provided.

Coventry City Council’s complaints procedures should be followed if an applicant is not happy with the level of service provided by the Coventry Homefinder Team. Details of the Council’s Complaints procedure are available on request or can be found on the Council website [www.coventry.gov.uk/complaints](http://www.coventry.gov.uk/complaints)

The Registered Provider’s own complaints procedure should be followed if an applicant is not happy with the way that the landlord has dealt with their application relating to:

- The advertisement of a property.
- The decision as to whether to accept the Council’s nomination.
- The decision as to whether to allocate a property to the applicant.

Details of each Registered Provider’s complaints procedures are available on request from the appropriate provider.

These procedures are available when an applicant feels that errors or omissions have been made in the way that their application has been administered. They are not intended to provide further reviews of decisions that have been taken – this is dealt with under the review process described in section 7.6

**7.8 Monitoring and changes to the policy**

To ensure that the aims of this Policy are met and that overall, priority for accommodation is given to applicants in the reasonable preference categories set out in legislation, robust monitoring will be carried out to monitor lettings outcomes.

The impact of the Policy will be monitored to ensure lettings are fair, transparent and in accordance with the allocations scheme, to ensure that the system is accessible to all, and
does not discriminate on the grounds of: race, age, gender, disability, sexual orientation, gender reassignment, religion or belief.

The day to day operation of the choice-based lettings scheme will be monitored by the Council’s Housing and Homelessness Service in conjunction with Partner Registered Provider staff who have responsibility for letting properties.

The Strategic oversight and co-ordination of this policy will be undertaken by the Coventry Homefinder Steering Group who will meet quarterly for the first year of policy and at least twice a year in subsequent years. The Homefinder Steering Group will include representatives from:

- Coventry City Council
- Citizen
- Midland Heart
- Orbit Heart of England
- Advice Services Coventry (Welfare Reform Working Together Group)

Reviews of this policy may be undertaken by the Council when required and in response to any updates required to reflect changes to administration of the choice-based lettings scheme, for example any change in IT Provider.

Further public consultation will take place if any additional significant changes are proposed in future due to changes in legislation and/or national guidance. The changes would also be subject to Cabinet approval.

7.9 Information sharing, confidentiality and data protection

Section 166(4) of the Housing Act 1996 prohibits housing authorities from divulging to other members of the public that a person is an applicant for social housing, unless they have the applicant’s consent.

Personal information will be shared internally within Council and with Coventry Homefinder Partner Organisations (Registered Providers) for the purposes of shortlisting and allocation of a property under this Policy. In addition, information may also be shared with other organisations including: Salvation Army, Coventry Cyrenians, Emmaus, St Basils, YMCA, Coventry Domestic Violence and Abuse Support Services, Coventry Haven, Valley House, Coventry Independent Advice Service, The Job Shop, Christians Against Poverty, Coventry Law Centre, Advice Services Coventry, Coventry Refuge and Migrant Centre, Carriers of Hope, Coventry Peace House, Change, Grow, Live, Open Hands, Coventry Food Bank, SPACES, Once we were soldiers, Coventry MIND, Coventry and Warwickshire Relate, Age UK, Coventry Irish Society. For more information as to how your personal data is handled, please refer to the Privacy Notice for the Homelessness Prevention Service also includes the Housing Allocations Policy which can be found at the following link: [https://www.coventry.gov.uk/homelessnessprivacypolicy].
Where the applicant’s housing circumstances are being assessed to determine their housing need band, other agencies including landlords may be contacted to provide supporting evidence.

The details provided by applicants will be used in connection with their Homefinder application and for research, analysis and statistical purposes regarding the need for and future development of housing in Coventry.

There may be circumstances where Coventry City Council is required to make disclosures to other organisations (for example, law enforcement agencies) if there is a valid and lawful reason. Information will not be released to other organisations that are not part of the Coventry Homefinder Partnership unless they are entitled to it by law.

Civica currently has a contract with Coventry City Council to host the Web-based system that holds the information that applicants provide.

The Homefinder partners may wish to contact Homefinder applicants in future when undertaking customer satisfaction and Homefinder usage surveys. These will be undertaken by Coventry City Council or its nominated agents.

### 7.10 Contact Details (Homefinder and partner Registered Providers)

The Coventry Homefinder Team can be contacted:

- By Phone on 024 7683 4024
- By writing to Coventry Homefinder - Coventry City Council
  
  PO Box 15  
  Council House  
  Coventry  
  CV1 5RR

- By emailing coventryhomefinder@coventry.gov.uk

- Customers who have already made an application can log into their account and use the online messaging system.

Applicants can also visit the Customer Service Centre in Broadgate (3 Upper Precinct, CV1 1FS). Opening hours are 9am – 5pm, Monday to Friday (excluding public holidays).

Please note: Changes to contact details, household or circumstances must be updated by the applicant. This is done by following the instructions in Section 7.1
Contact details for the Coventry Homefinder Registered Providers:

<table>
<thead>
<tr>
<th>Organisation</th>
<th>Address</th>
<th>Telephone number</th>
</tr>
</thead>
<tbody>
<tr>
<td>Coventry Homefinder</td>
<td>Customer Service Centre, 3 Upper Precinct, CV1 1FS</td>
<td>024 7683 4024</td>
</tr>
<tr>
<td>Accord Housing Association</td>
<td>178 Birmingham Road, West Bromwich, West Midlands B70 6QG</td>
<td>0300 111 7000</td>
</tr>
<tr>
<td>Bromford Group</td>
<td>1 Exchange Court Brabourne Avenue Wolverhampton Business Park Wolverhampton WV10 6AU</td>
<td>0330 1234 034</td>
</tr>
<tr>
<td>Citizen</td>
<td>9 Little Park Street, Coventry, CV1 2UR</td>
<td>0300 790 6555</td>
</tr>
<tr>
<td>Clarion</td>
<td>Gee Business Centre Holborn Hill Aston, Birmingham, B7 5JR</td>
<td>0121 322 7373</td>
</tr>
<tr>
<td>Midland Heart Housing Association</td>
<td>20 Bath Row, Birmingham, B15 1LZ [<a href="http://www.midlandheart.org.uk">www.midlandheart.org.uk</a>]</td>
<td>0345 6020540</td>
</tr>
<tr>
<td>Nehemiah UCHA</td>
<td>1-3 Beacon Court, Birmingham Road, Great Barr, Birmingham, B43 6NN [<a href="http://www.nehemiah-ucha.co.uk">www.nehemiah-ucha.co.uk</a>]</td>
<td>0121 358 0966</td>
</tr>
<tr>
<td>Optivo</td>
<td>41 Poplar Road, Kings Heath, Birmingham, B14 7AA [<a href="https://www.optivo.org.uk/">https://www.optivo.org.uk/</a>]</td>
<td>0800 121 60 60</td>
</tr>
<tr>
<td>Orbit Heart of England Housing Association</td>
<td>Garden Court, Harry Weston Road, Binley Business Park, Coventry, CV3 2SU [<a href="http://www.orbit.org.uk">www.orbit.org.uk</a>]</td>
<td>0800 678 1221</td>
</tr>
<tr>
<td>Starley Housing Co-operative</td>
<td>17A Starley Road, Coventry, CV1 3JU [<a href="http://www.starleyhousing.org.uk">www.starleyhousing.org.uk</a>]</td>
<td>024 7622 3111</td>
</tr>
</tbody>
</table>
Coventry Homefinder Review Consultation Statement

Table of Contents
1. Executive Summary ..............................................................................................................................2
2. Consultation Approach ........................................................................................................................2
3. Let’s Talk Consultation Survey Responses .........................................................................................4
4. Consultation Responses ........................................................................................................................5
   A. Question One – Definitions - General Public Responses .................................................................6
   B. Question One – Definitions - VCOs and RPs Responses ...............................................................9
   C. Question Two – Qualification Criteria - General Public Responses ..............................................12
   D. Question Two – Qualification Criteria - VCOs and RPs Responses .............................................17
   E. Question Three – Changing the banding system - General Public Responses ...........................19
   F. Question Three – Changing the banding system - VCOs and RPs Responses ............................22
   G. Question Four – Reduced Preference Band – General Public Responses ....................................24
   H. Question Four – Reduced Preference Band - VCOs and RPs Responses ....................................26
   I. Question Five – Bidding Cycle - General Public Responses ..........................................................28
   J. Question Five – Bidding cycle - VCOs and RPs Responses .........................................................31
   K. Question Six – Number of refused offers - General Public Responses .........................................33
   L. Question Six – Number of refused offers - VCOs and RPs Responses ........................................36
   M. Question Seven – Adapted Properties - General Public Responses .........................................38
   N. Question Seven – Adapted Properties - VCOs and RPs Responses ............................................39
   O. Question Eight – Application Process – General Public Responses .............................................41
   P. Question Eight – Application process - VCOs and RPs Responses ............................................44
   Q. Question Nine – Annual review process - General Public Responses ..........................................45
   R. Question Nine – Annual review process - VCOs and RPs Responses ........................................47
   S. Question 10 - Equalities ..................................................................................................................48
   T. Question Eleven – Any other comments or alternative suggestions ............................................51
5. Other consultation contact and/or feedback ..................................................................................52
6. Key changes made to proposals following consultation .................................................................53

Appendix 1 – List of organisations and/or registered providers who responded to consultation. – Where the organisational name was given .........................................................................................57
1. Executive Summary
The proposals consulted upon would change how social housing is allocated in Coventry from who can apply, how you apply, how priority for housing is given and other administrative changes such as, the number of refused offers allowed within the policy or the time allowed for completing the annual review process.

This consultation statement looks at each consultation survey question (proposal) in turn, outlining the strength of opinion for each change and highlighting prevalent themes.

The analysis is broken down by general public feedback and organisation feedback either from Registered Providers or other voluntary sector organisations. Appendix 1 of this report provides details of the organisations who responded to the consultation survey.

The overarching themes can be summarised as follows:

- Prioritise local people for housing
- More housing options required – high cost of renting in the Private Rented Sector (PRS)
- The need to improve the information available on Coventry Homefinder about the individual properties to support applicants to make informed choices about meeting their housing need (themed as suitability of offers within this report)
- How the policy changes would be implemented / applied (e.g. concern about impact on current applicants)
- Respondents providing details of their current housing circumstances to support their views
- Disabled people are very positive regarding the changes for how adapted properties would be advertised and allocated.

2. Consultation Approach
The review of the current Coventry Homefinder Policy formally began in June 2019 with the initial workshop for Registered Providers (Housing Associations). All 10 Registered providers with housing stock in the City were invited, with 6 in attendance. Those Registered Providers who attended workshops collectively let 98% of properties advertised on Coventry Homefinder in 2018/19. Prior to the workshop questionnaires seeking views on the current policy were sent to all Registered Providers and workshops were held with staff in the Housing and Homelessness service to seek their views on the current policy.

A further 3 workshops were held in July, September and October 2019. Citizen and Midland Heart attended all 4 workshops. Accord Housing Association, Orbit and Stonewater Housing Association attended 3 out of 4 workshops with Clarion Housing Association attending the first workshop.

A Coventry Homefinder Steering Group was established in July 2019. The Steering Group membership includes Council staff from the Housing and Homelessness Service, representatives from Citizen, Orbit and Midland Heart, the Registered Providers with the largest housing stock in Coventry and a representative from the Voluntary Sector representing the Welfare Reform Working Together Group.
Existing forums, such as the Homelessness Forum and Frontline Network were asked to input their feedback as the review progressed. The Let’s Talk Coventry Online Platform (quick polls and Question and Answer page) was utilised to gain feedback from members of the public on the current Homefinder policy and their experiences of being on the housing register. Between 25th June and 10th November 2019, the site had 699 visits from 561 unique participants, of which 108 participants either asked a question, answered the quick polls or downloaded a published document.

All the above activities contributed to the development of a set of proposals for change to the Coventry Homefinder Policy.

The public consultation survey was published on 11th November 2019 for a period of 8 weeks closing on 3rd January 2020. The purpose of the survey was to gain wider public feedback on the proposals from the general public, the Voluntary Sector and other organisations with an interest. For Registered Providers, the survey provides them with the opportunity to formally comment on the proposals to amend the allocations policy, as per legislative requirements within the Housing Act, 1996 (Section 166A).

Activities to raise awareness of the consultation survey

- **Article in the Council's Citivison magazine** – Winter 2019 Edition advising of forthcoming consultation. Citivison is delivered directly to resident’s homes within Coventry, copies are available in Council Libraries and available to download from the Council’s website.

- **Front page of the Coventry Homefinder website** (where applicants need to go to log in to their Coventry Homefinder accounts in order to bid for housing and/or renew their housing applications).

- **Auto message via Coventry Homefinder website.** An auto message was sent to all active housing register applicants to their Homefinder accounts to advise them about proposals to change the current policy and signposting them to the survey and consultation materials. Applicants need to log into their account to see the message. Applicants are able to respond to

- **Specific communications to applicants on the housing register** – In addition to the auto message sent to all applicants on the register. The Council has also chosen to write and/or email specific groups of applicants whereby due to their current circumstances may not be regularly logging into their Homefinder account. These groups are:
  1. Those applicants who are currently registered on the adapted properties list. (written to and provided with consultation pack)
  2. Those applicants who are currently registered on Coventry Homefinder and are accepted as statutorily homeless and therefore unable to place their own bids (emailed where email address was known to the Housing and Homelessness Service).
  3. Those applicants who currently receive the weekly property list and bid via telephone. (written to and provided with consultation pack)
  4. Those applicants for who are registered for the ‘assistive bidding’ service. (written to and provided with consultation pack)

- **Telephone and email** - The Coventry Homefinder contact number 02476 834024 had a menu option for the consultation. If a customer selects option 3 for consultation – advisors will answer any questions and/or send out consultation packs by post or send customers
an email with the direct link to the Let’s Talk page where the survey is located. - An email address is published on the Let’s Talk website.

- **Coventry City Council Website** – Information about the consultation survey and proposed changes is available on the Coventry Homefinder pages of the website. In addition, the consultation survey is advertised on the front page of the Council website.
- **Council run libraries** – Information about the consultation is available in the 14 Council run libraries. Each library has a suite of consultation materials available (posters, leaflets, key changes document, paper copies of the consultation survey and a reference copy of the proposed policy.
- **Citizen Offices** (formally Whitefriars Housing) – 9 Little Park Street, Coventry, CV12UR. Posters and leaflets advertising the consultation survey were provided to Citizen, as the largest Registered Provider (Housing Association) in Coventry following the stock transfer from the Council in September 2000. The Citizen website also informs people that the Coventry Homefinder Policy is being reviewed and signposts people to the consultation page on Let’s Talk.
- **Social Media** – via Coventry City Council Facebook and Twitter accounts. Over 41,000 people saw the social media posts and 430 people followed the link to the consultation survey page.
- **Internal Council Communications** – The Council has also publicised the consultation via the Council intranet, email ‘intranet roundup’, weekly news bulletin and Members bulletin. Information also circulated to specific employee networks.
- **Targeted face to face briefings and/or email circulation** – The Council has also used existing forums or networks to raise awareness of the proposed changes to the Coventry Homefinder Policy. Face to face briefings have been held with:
  - Disability Equality Action Partnership (DEAP)
  - Coventry Homelessness Forum
  - Front line network (network of frontline staff working in the housing and homelessness Sector)
  - Adult Social Care Stakeholder Reference Group (Council run group for people with care and support needs, their carers with some voluntary sector representation)
  - Coventry Older Voices Management Committee
  - Specific Staff within the Council have been briefed, the Housing and Homelessness Service and staff from Family Hubs
  - Email circulation to Police and Crime Board, Homelessness Forum and Frontline Network when consultation survey published.

### 3. Let’s Talk Consultation Survey Responses

The public consultation survey on Coventry Homefinder Proposals opened on 11th November 2019 and closed on the 3rd January 2020. During this time period, the consultation pages were visited by 1892 unique individuals, and consultation documents were downloaded a total of 830 times. Links to the consultation documents were included on the front page of the website in order for respondents to consider before completing the survey. The consultation survey was completed by 486 people.

The consultation survey asked questions about each proposal in turn and invited respondents to indicate to what extent they agreed with each, as well as to write any further comments they had.
The consultation was structured in a way such that respondents were presented with reminder information about the specific proposal they were commenting on throughout the survey. This was done in order to help respondents to break down a large policy into manageable elements and comment on them individually.

Towards the end of the consultation survey, respondents were asked whether they felt that the proposals could have any particular impact amongst different groups and were prompted to specifically consider age, disability, gender reassignment, pregnancy and maternity, race/ethnicity, religion and belief, sex, and sexual orientation. The survey also invited the respondents to offer any other comments or alternative suggestions to do with the consultation and proposed changes. At the end of the consultation, equalities questions were asked of the respondent (age, care leaver status, sex, gender reassignment, sexual orientation, religious belief, disability, marital status, maternity, ethnicity, connection with the armed forces) in order to analyse how respondents across different groups viewed the proposals differently.

4. Consultation Responses

The following section explores general public responses to each of the proposals in turn. Responses from Registered Providers (RPs) and Voluntary and Community Organisations (VCOs) will be considered in a later section. It is evident from a couple of the responses within organisational response section contains responses from individuals.

For each question, respondents were asked first to indicate their level of agreement from amongst the following options: Strongly Agree, Agree, Neither Agree nor Disagree, Disagree, Strongly Disagree, Don’t Know. Next, respondents were encouraged to offer any further comments. The following section will follow that structure, firstly showing general levels of agreement and then engaging with an analysis of the themes emerging from the comments offered.

Throughout the following section, where particularly relevant to the question being considered, individual contributions from consultation respondents will be highlighted.
A. Question One – Definitions - General Public Responses

A total of 450 responded to question one, of whom 49.3% indicated Strongly Agree or Agree. By way of contrast, 25.8% of respondents indicated Strongly Disagree or Disagree. The graph below details the number of responses in full.

![Bar chart showing responses to Question One]

**Question One Summary of Theme Analysis:**

In general, respondents indicated:

- There could be greater clarity with regards to definitions;
- Low Housing Need is an unpopular term;
- Adequately Housed is something which needs to be sensitively handled with respect to individual circumstances.

**Question One Theme Analysis:**

The following themes were prevalent within the open-text responses to Question One:

- **Low Housing Need**
  - These were responses which surrounded the definition of Low Housing Need. Broadly speaking, many respondents were unhappy with the label of Low Housing Need since individuals did not feel that their own needs were low, as the following responses illustrate:
• ‘I agree that the changes are required but think using the term 'Low housing need' should be reconsidered. Using the term 'Housing Need' may be preferable as the public won't accept that their circumstances are considered to be 'low' need’
• ‘Your low housing need is terrible I have recently seen a mother and three children sharing one room at her mother's house after her private tenancy ended - you count this as low need she was there for nearly a year. People wanting to live together is low need? Where are your family values where a couple want to live together and raise a child together?’
• ‘Low housing need should (and does) reflect the difference between those who 'want' housing and those who 'need' housing’.

• Personal Circumstances
  - Throughout this question, a large number of respondents referred to their personal experiences to inform their answers:
    • ‘I am currently living with parents with my nearly 1 year old son in an overcrowded house in a box bedroom. I think I am more than low housing needs as it’s affecting his health and also mine.’

• Affordability of Private Rented Sector Housing
  - A consistent theme throughout the responses was the unaffordability of Private Sector lettings, which many respondents said made it impossible for them to find accommodation outside Homefinder. Responses in this theme were commonly linked to the definition of Adequately Housed, as detailed below.

• Definitions Too Vague
  - A number of respondents spoke about how they felt that the definitions felt too vague or unclear, worrying about how they would be applied in practice:
    • ‘Tenancy readiness' is an entirely superfluous and unnecessary criterion. Whosoever is paid to interpret it with respect to applications for housing is in an entirely arbitrary position of authority over applicants, is presenting an unnecessary extra level of obstructive procedure to applicants, and is thereby making the application procedure less and not more efficient than it already is’
    • ‘Wide ranging categories are too ambiguous. They need to be more specific.’

• Waiting Time for Housing
  - A large number of respondents expressed a frustration to do with how long people wait on Homefinder before being housed.

• Adequately Housed
  - A large number of respondents felt badly about this definition. Particularly, respondents wanted the classification of Adequately Housed to be more sensitive to their individual circumstances, financial struggles, and any associated health issues. Respondents also wished for this definition to be clearer.
    • ‘Adequately housed is far too general and needs to have far more issues taken into consideration. Such as is the house they are currently situated in, more expensive than they can afford with any longevity with no alternatives such as estate agents/private landlords to them. Are those with increasing medical needs ignored because
they have an adequate sized house with suitable amount of bedrooms yet cannot make it upstairs to them ignored? Please extend on these definitions in more detail.’

- **Overcrowding**
  - A number of responses expressed a wish that overcrowding was given stronger weighting with regards to the implementation of the three definitions:
    - ‘I find that tenants like myself. Should be more of a priority to needs of housing. I'm over crowded with 3 children and 2 of them children are still sharing my bedroom. I think more should be done to help.’

- **Banding System**
  - A number of respondents were unclear as to how these definitions would relate to the banding system.
    - ‘CONCERNED ABOUT HOW THE BANDING WOULD BE APPLIED.’
    - ‘How does these changes apply to families with children of different sex and age, who are living in overcrowded homes?’

- **Disability**
  - A number of different respondents spoke about how disability related to things such as overcrowding in homes. In particular, a number of respondents spoke about how there can be a struggle with children with autism sharing rooms with other siblings.
    - ‘What about two same sec children where one has disabilities? ... my children are struggling in one bedroom. Older son is using my bedroom for the time of doing his homework as with younger autistic brother in the same room it is not possible. Sleeping disorders and again older son is suffering.’

- **House Local People**
  - A number of respondents indicated a wish that local people who are born in Coventry be given a greater priority for housing than they already do.

- **Tenancy Readiness**
  - Respondents felt unclear about the definition of Tenancy readiness:
    - ‘I'm also disagree with Tenancy Readiness policy. If the people living in supported accommodation such as hostels, are going to be the first to get home once they are ready for their own tenancy its not a problem for me, but if, in your opinion, benefits are going to be that readiness, I disagree completely. If the readiness in your opinion means employment, I agree’

- **Adapted Properties**
  - Some respondents wanted there to be a greater focus on disability adaptations with relation to whether housing is considered adequate:
    - ‘I think there should be a little more clarity with respect to disability. It may be that people are in a home that is the right size, not in disrepair, etc. but does not suit needs because of disability. This, as is the case in other councils, is not always considered appropriately’

- **Homelessness**
  - There was a concern amongst respondents to do with the status of homeless people who were staying with friends or family:
'Ultimately I feel uncomfortable that these changes suggest that provided you are staying with friends, your housing need is lower than others'

The following graph details the relative prevalence of each of the above themes.

B. Question One – Definitions - VCOs and RPs Responses

A total of 19 responded to question one, of whom 74% indicated Strongly Agree or Agree. By way of contrast, 16% of respondents indicated Strongly Disagree or Disagree. The graph below details the number of responses in full.
In comparison with the General Public, the VCOs and RPs are more positive towards the proposed definition. VCOs and RP responses also shared some of the themes which were present in the General public responses:

Within each of the themes, VCOs and RPs were supportive of the definitions offered and many responses indicated that they welcomed the new definitions and their simplicity. Some other responses, however noted that they wished for more clarity with regard to some of the definitions:
‘Separately, on 'tenancy readiness', there is an important point of clarification required. In our view it must be assumed that if an applicant to Homefinder 'passes the tenancy ready test' at the application stage there should be no additional test applied to their tenancy readiness by prospective landlords at the pre-tenancy interview. Being turned down at the final stage of bidding, on tenancy ready terms, should only happen - in our view - if the client has been unable to prove the claims they made at the application stage or if their circumstances have changed and no notification to Homefinder had been made.’

‘Low Housing Need – this definition of affordability conflicts a little with the Adequately Housed definition, which includes that the current property should be affordable. Homelessness legislation also considers that an applicant could be homeless if their accommodation is not affordable. There should be flexibility to assess affordability as accurately as possible before rejecting an application for this reason.’

‘We would like more clarity about those who are not care leavers or hostel dwellers, and what situations would cause their applications to be skipped.’
**Question Two: - Qualification Criteria – General Public Responses**

This question was to do with proposed changes in the way in which people will apply to housing on Homefinder. The proposals involved changing the qualification criteria such that only households with an assessed housing need and local connection would be able to apply (though allowing those with a housing need and no local connection in exceptional circumstances), as well as adding an asset/income cap. As before, respondents were able to answer Strongly Agree, Agree, Neither Agree nor Disagree, Disagree, Strongly Disagree, and Don’t Know to the question, as well as to leave a free-text response.

**C. Question Two – Qualification Criteria - General Public Responses**

A total of 449 people indicated their level of agreement to this proposal, amongst whom:

- 53.9% either indicated Strongly Agree or Agree
- 31.2% either indicated Strongly Disagree or Disagree

The following graph details the number of responses in full:

**Question Two: Summary of Theme Analysis**

The general themes of the discussion were the following:

- Respondents were concerned about the Adequately Housed criterion, and whether it would be sensitive to individual cases;
- Whilst Low Housing Need was controversial in the previous question, a number of responses indicated support for a similar category;
- Whilst many were keen that only locals be housed on Homefinder, others were concerned that certain groups may lose out, for instance those fleeing domestic violence.

**Question Two: Theme Analysis**
The following themes were most prevalent within the open-text responses on this set of proposals:

- **Adequately Housed**
  - As with the previous question, many respondents took issue with the idea of Adequately Housed, particularly when it was related to who would be able to apply for the register. Respondents expressed a wish that individual circumstances would be considered on a case by case basis:
    - ‘Again, the definition of ‘adequately housed’ is a superfluous criterion that is open to interpretation, and whosoever is responsible for interpreting it with respect to housing applications is simply presenting another arbitrary layer of inefficient and obstructive bureaucracy to the application process. And then what the authority considers to be ‘adequate’ housing can change at any time. Whilst similarly at any time, adequate housing can quickly become inadequate housing, with occupants of such housing left with no recourse to obtain adequate housing since the authority already considers them to be adequately housed. It should be enough that an applicant considers themselves to be inadequately housed. How they are rehoused will still be dependent upon their needs.’
    - ‘Adequately housed - this needs to be reviewed where there are special needs children in household. Many families will lose the right to use Homefinder because they are adequately but inadequately housed.’

- **House Local People**
  - This theme is comprised of a number of responses who wished for housing to be allocated to those who were born in Coventry.

- **Local Connection**
  - There is some overlap between this theme and the previous theme, but this theme was focused more closely on the Local Connection criteria. In each of these themes, respondents were keen for those with local connections to be housed first.

- **Asset and Income Cap**
  - A number of people commented on the proposed income cap. Many of the comments on this theme disagreed with the income cap, though others were either supportive or were more concerned that it be set and implemented in the right way:
    - ‘Asset and income cap should not be added’
    - ‘I dont agree with the income cap houses are a ridiculous price you need to earn over 60 grand or more to afford a mortgage’

- **Disability**
  - As was the case for the previous question, a number of respondents were concerned about how disability would relate to ideas of being adequately housed.
• ‘What about people who appear to be adequately housed but due to failing health, eg arthritis need housing on the ground and not in high rise accommodation’

• Administration of Policy
  - A number of respondents were concerned about how the policy would be implemented. A particular worry to do with fair assessments was expressed by some.

  • ‘I do feel that as it may be difficult for some applicants to get the right words on paper they should be able to have a meeting with a housing officer at their current property to explain their need and where the property and size of bedrooms etc can be witnessed before a decision is made’

• Affordability of Private Sector Housing
  - A number of respondents, as in the previous question, spoke about how private sector housing is unaffordable and how this financial pressure should be taken into account when considering assessing whether somebody is adequately housed.

  • ‘Just because someone appears to be 'adequately housed', should not mean they can no longer apply. People have no choice but to rent privately, if they have the means to do so, live in inadequate housing, find creative ways to support themselves etc. Some people only just manage, but because they’re 'adequately housed' & managing, you’re going to refuse them eligibility??’

• Banding System
  - Some respondents talked about different changes to how the banding system could be changed with regards to different situations. Many of these situations stem from personal examples. There was also a concern with regards to what will happen to those who have been waiting on the existing system:

    • ‘What about those already on band 3a who have been on the list for years’
    • ‘many have been waiting years totally unfair to change. given i myself have been collecting information for 3 years to see which properties have been allocated by application date.... instead of band my find has been shocking.’
    • ‘I am housed but have a three bedromed house. I'm on my own. It is difficult because I need to downsize because I may not in the future be able to afford my property. I hope I'm not being let down by the system or other people are let down on this its to scarey to think about.’

• Personal Circumstances
  - As before, a large number of responses were supported by personal examples from the lives of respondents.
• Low Housing Need
  - Whilst Low Housing Need was shown to be a controversial term in the previous question, nonetheless, many respondents expressed a wish for things which could be factored into that category. In that way, respondents can be viewed to be opposed to Low Housing Need in name, but not principle.

  ▪ ‘It is not fair to refuse those who wish to register if they are deemed 'adequately housed' sometimes people need to move areas for family etc and so they should still be allowed to register and given low priority’

  ▪ ‘People who are 'housed' but are ytuggling with thier current accommodation should have the option to explore different tendencies on homefinder’

  ▪ If there is no housing need they should not be held on the register as they have other options available

• Homelessness
  - There was a particular worry with regards to how local connection requirements might affect homeless people who may have no local connection:

  ▪ ‘My only question is how will people with no local connection to Coventry be housed? I do have a local connection but surely this would see a rise in homelessness?’

  ▪ ‘Many of the street homeless/rough sleeper homeless that we work with have been in Coventry for a significant time, but other than being homeless in the city, they have no official connections with Coventry and therefore I worry that they will be classified as not being exceptional circumstances and therefore not able to be helped.’

  - There was also a worry expressed that Adequately Housed criteria might lead to some becoming homeless.

  ▪ ‘Really depends on how the definition of "adequately housed" is applied in practice... Have to be careful that skilled advisors are available where needed or some people will suffer homelessness they don't deserve.’

• Registered Provider Lettings Policies
  - Responses in this theme had to do with options to swap housing with other properties allocated on Homefinder.

  ▪ ‘This will not help people who wish to move out of the current area they live, home swapper doesn’t really work with the great difference in house sizes in Coventry you can be turned down by swappers for that alone’
- Supply of Housing
  - These responses were to do with a housing shortage in Coventry.

- Waiting Time for Housing
  - As in the previous question, a large number of people expressed a frustration with long waiting times.

- Communication
  - These were a number of responses where communication could play a role in the better delivery of the policy, as well as in engagement more broadly.

- Domestic Violence
  - A number of respondents were worried about whether those fleeing domestic violence would still be able to register, especially given that many of them may be new to the Coventry area.
    - ‘wouldn’t want anyone to miss out due to the criteria ie someone fleeing an abusive relationship who could be new to area’

- Change of Circumstances
  - This theme surrounded the idea that somebody who has been adequately housed may later find their accommodation unsuitable.

- Armed Forces
  - Two consultation respondents talked about how there ought to be greater priority given to armed forces personnel – including one who wanted this to be an exception to local housing requirements.
    - ‘Local people must come first with being housed. Born here, contributing to society, apart from veterans who should be housed first’

The below graph shows the relative prevalence of the themes shown above:
D. Question Two – Qualification Criteria - VCOs and RPs Responses

A total of 19 responded to question two, of whom 68% indicated Strongly Agree or Agree. By way of contrast, 16% indicated Strongly Disagree or Disagree. The graph below details the number of responses in full.

In comparison with the General Public, the VCOs and RPs are more positive towards the proposed definition. In contrast to the responses of the general public, VCOs and RPs were less concerned with the Adequately Housed criterion, and were more concerned with the manner in which the change in Homefinder’s focus would be communicated with existing applicants, as well as seeking clarity on the Asset and Income Cap:

- ‘Coventry CA acknowledges that this is a significant revision of existing policy and, in effect, re-channels the purpose of Homefinder from being perceived and used as a 'council house waiting list' to being focused on preventing or reducing homelessness for those in priority housing need. CCA supports this change of focus, particularly in the wider context of growing homelessness and reducing amounts of available affordable housing, but wants to make absolutely clear its concerns around how the unavoidable reassessment of all those currently registered on Homefinder will be communicated and carried out; especially to vulnerable tenants who have an embedded view of what Homefinder is for. Coventry CA is also concerned that it may not be clear enough from the consultation documents that there will be an income-based barrier to registering on Homefinder as well as a housing priority consideration. Though CCA understands and supports the income barrier we are not clear that these specific proposals have been given enough prominence in the consultation exercise to elicit important comment from those who might be affected’
Do you have any other comments you want to make about the proposals to amend who can register on Coventry Homefinder?

- Adequately Housed: 1
- Affordability of Private Rented Sector Housing: 1
- Disability: 1
- Local Connection: 1
- Qualification Criteria: 2
- Communication: 2
- Homelessness: 3
- Administration of Policy: 5
- Asset and Income Cap: 5
Question Three: - Changing the banding system

This question concerned proposals to change the banding system from seven bands to five. Implementing this proposal would result in some people on Homefinder being given different levels of priority from before. As before, respondents were able to indicate their level of agreement as either Strongly Agree, Agree, Neither Agree nor Disagree, Disagree, Strongly Disagree or Don’t Know.

E. Question Three – Changing the banding system - General Public Responses

A total of 448 people responded to the question, amongst whom:

- 61% indicated Strongly Agree or Agree
- 17.4% indicated Strongly Disagree or Disagree

The following chart details the number of people indicating each level of agreement to the proposals:

Q3 (General Public): Please tell us whether you agree or disagree with the proposal to reduce the number of bands from seven to five.

Question Three: Summary of Theme Analysis

- The largest public worry to do with this proposal was related to the impact of changing the banding system upon those who are already registered on the Homefinder system.
- Some respondents were worried that the change in banding might lead to more people becoming homeless in order to seek higher priority for housing.
- Many respondents were supportive but were interested in how the policy would be carried out in practice.

Question Three: Theme Analysis

The following themes were most prevalent in the free-text responses to this proposal:
• Banding System
  - Responses focused on the banding system largely fell into one of four themes which will be explored more deeply later:
    ▪ Multiple Housing needs
    ▪ No change needed
    ▪ Agreement with the reduction of bands
    ▪ Impact on current applicants

• Overcrowding
  - This theme was comprised of a number of people who were concerned that their banding may be reassessed as a less urgent need.

• Personal Circumstances
• Administration of Policy
  - Responses in this theme were to do with the fair and correct application of the new bands.

• Homelessness
  - A number of responses were concerned that the policy could lead to homelessness as a result of priority help being given to those who are homeless:
    ▪ ‘No wonder homelessness is on the rise if the only way your local council will help you is if you are homeless.’

• Waiting Time for Housing
  - A number of respondents were concerned that a reduction in the number of bands might lead to longer waiting times:
    ▪ ‘I disagree because changing the banding is changing people's priority the wait for a house is already long enough and I'm concerned this will make it longer, I'm over crowded and I'm still not any closer to being offered a bigger home’

The following graph shows the relative prevalence of the themes:
As previously mentioned, there were a number of comments which were focused on the number of bands.

- **Banding System**
  - Multiple Housing Needs
    - Responses in this theme focused on how banding will be assessed amongst households with needs across different bands.
  - No Change Needed
    - Responses in this theme were happy with the system as it is. Some were worried that it would be difficult to capture complexity in reduced bands:
      - ‘I think it’s very difficult to shoe horn people into housing into just 4 bands, each band would have such varying needs within it’
  - Agreement with Reduction in Bands
    - Responses in this theme were positive about reducing the number of bands to three.
      - ‘It’s a good idea to change the bands but being in priority banding already I’m hoping it isn’t going to affect me too much as it’s all ready hard to get a property’
      - ‘I agree with this to simplify the process and understanding’.
  - Impact on current applicants
    - A large number of respondents were concerned about how the changes to the banding system would affect those who are already on Homefinder.
      - ‘I don’t completely disagree with reducing the number of bands but current banding status must be taken into consideration. I am not looking forward to having to provide repeat evidence that you already have on file to process my housing needs. I was told that my priority band would provide me with accommodation in approximately 18 months. I've already been waiting 11 months and this is now under threat with the reduced bandings. This is totally unfair after such an already extensive wait.’
      - ‘By changing the level of priority I will be moved down, I currently live in a 2 bedroom house with my 15 year old sharing a bedroom with his 10 year old and 8 month sister. Please tell me how that is morally right?’

The following graph shows the relative prevalence of these themes:
F. Question Three – Changing the banding system - VCOs and RPs Responses

A total of 19 responded to question three, of whom 84% indicated Strongly Agree or Agree. By way of contrast, 5% Disagree. No ‘strongly disagree’ responses were received. The graph below details the number of responses in full.

Again, in comparison with the General Public, the VCOs and RPs are more positive towards the proposal. VCOs and RPs in comments asked a number of clarificatory questions on different groups of people accessing Homefinder. Particular concern was expressed with regard to those who are leaving care, prison or hospital, as well as those who are owed HRA duty. VCOs and RPs were keen to understand how these groups could be prevented from falling into the Reduced Preference Band. There was also concern to do with a ‘category overlap’ where there was confusion as to which bands and duties applied to individual cases. Nonetheless, broadly, VCOs and RPs remained supportive of the proposal.
Q3: If you disagree with changing the number of bands or the level of priority given to different applicant groups, please tell us why.

- Banding System - Multiple Housing Needs: 1
- Banding System - Agree reduce bands: 1
- Tenancy Readiness: 1
- Communication: 1
- Care Leavers: 1
- Unsuitable to be a tenant: 1
- Homelessness: 2
- Banding System: 2
- Reduced Preference Band: 2
**Question Four – The Reduced Preference Band**

This question was concerned with the proposal to introduce a reduced preference band for those who have unacceptable behaviour or rent arrears, or those who have refused three offers of accommodation or have not actively bid on the Homefinder system. Respondents to this question were provided with the same options to respond as in previous questions.

**G. Question Four - Reduced Preference Band – General Public Responses**

In total, 447 members of the general public chose to respond, amongst whom:

- 62% indicated either Strongly Agree or Agree
- 15.4% indicated either Strongly Disagree or Disagree

The following chart details the numbers of those who indicated each level of agreement to the proposal.

**Question Four: Summary of Theme Analysis**

- There were a number of worries associated with the idea of unsuitable tenants. Some of these surrounded the issue of rent arrears, which many worried were common struggles.
- Other concerns were related to offers being refused due to unsuitability. Respondents were worried that houses were often poorly described.
- Respondents were worried about active bidding leading to people bidding on homes in areas which are far from schools and support networks.
Question Four: Theme Analysis

The following themes were most prevalent in the free-text responses to this question:

- Unsuitable to be a tenant
  - A number of respondents had worries relating to assessing people as being unsuitable tenants. Some of these worries surrounded the question of rent arrears:
    - ‘Just because someone is in a week or two in arrears does not mean they are not a good tenant. I find myself sometimes in arrears because I physically can not get out of the house for a long period of time or I am to scared to be in the house but to scared to leave it either.’
    - ‘Some reasons for rent arrears are not the tenants fault so this again is unfair’
  - However, other respondents were more positive about this proposal:
    - ‘I think this is fair enough. A lot of people would love to be able to be house by their local council so if someone is not behaving correctly and using the system appropriately then they should be given a lower band.’
    - ‘as long as people are being told why and being given help to leave then should work fine’

- Active Bidding
  - Some respondents were concerned that those who are not actively bidding might be those who are struggling with health issues:
    - ‘Not actively bidding may have many reasons ie disability, no access to internet.’
  - Others were concerned that a requirement to actively bid might lead some to bid on properties that were unsuitable or not in an area to their liking:
    - ‘I will only bid for houses where I want to live and not dumped in areas where its rough and not suitable for my family’

- Refused Offers – Suitability of Offer
  - Similarly to the previous theme, a number of respondents were concerned about the suitability of housing offered. Some were concerned that housing was often offered in places far from family, schools and support networks:
    - ‘Your offers are often ludicrous and unsuitable - families that need support being offered homes away from people they know that help or forcing children to change schools, often the schools in the new area have no space so have to travel miles.’
  - Others were concerned that often offers are refused because it is not always apparent when bidding what the quality or nature of the house offered is until a physical visit:
    - ‘Until a property is actually viewed there is no real way of knowing if it is suitable for the applicant. By making applicants have a penalty for not bidding you are encouraging false bids just to remain active. And punishing those who have felt forced to bid on something they know is not suitable but they are offered it.’

- Disability
A number of respondents were concerned about whether homes offered would be suitable for their disabilities. There was also a focus on mental health:

- ‘If you have mental health issues a flat/bedsit would suit their physical environment but may not be suitable for their well being/mental health. Could feel unsafe and vulnerable in a closed/built up environment’

The following chart shows the relative prevalence of the identified themes:

**H. Question Four – Reduced Preference Band - VCOs and RPs Responses**

A total of 19 responded to question four, of whom 74% indicated Strongly Agree or Agree. By way of contrast, 16% Disagree. No ‘strongly disagree’ responses were received. The graph below details the number of responses in full.

In comparison with the General Public, the VCOs and RPs are more positive towards the proposal in general. In both groups, the respondents are more likely to ‘agree’ than ‘strongly agree’ with
the proposal. But note, that comparing the two groups (General Public and Organisations) like by like can be difficult as there is a vast difference in the number of respondents within each group.

Comments received

- ‘Agreed that the reduced preference will ensure that people take seriously their bidding and if refuse suitable properties then they are showing they are clearly not in housing need. There is a need to manage the expectations of those on the list. For those ‘unsuitable to tenant’ there would need to be a clear path for them to follow to show them how they could become tenancy ready’.

- ‘This could discriminate against people who previously got into debts that were beyond their real control. e.g. mental health issues, partner issues, scams’.

- ‘Coventry CA supports the addition of this banding and believes identifying early those likely to be 'skipped’ at the latter stages of the bidding process and giving them the opportunity to remedy perceived barriers to tenancy readiness, will save time and a degree of frustration for all concerned; ensuring properties are allocated to suitable service users more efficiently. We believe the key to making this new banding a success is for all to view it as a temporary placement dependent on those within it working to exit from it. We believe it will act as a spur to some to work to improve their circumstances and notify Homefinder of relevant changes in their circumstances’.
Question Five: - Bidding Cycle

This question was concerned with the proposal to change the ‘bidding cycle’ to enable properties to be advertised on any day. People will have 7 calendar days to bid for a property. Currently there is a static bidding cycle from midnight (00.00am) on Thursday morning to the following Tuesday night (11.59am). Respondents to this question were provided the same options to respond as in previous questions.

I. Question Five – Bidding Cycle - General Public Responses

In total, 446 members of the general public chose to respond, amongst whom:

- 74% indicated either Strongly Agree or Agree
- 7% indicated either Strongly Disagree or Disagree

The following chart details the numbers of those who indicated each level of agreement to the proposal.

![Chart showing responses to feedback on the bidding cycle]

Question Five: Summary of Theme Analysis

- Many respondents were supportive of the changes to the bidding cycle since they felt that it was a fairer system which would be easier for people to use.
- A number of respondents were concerned about how IT access problems might make it difficult for people to access the bidding system.
Some respondents felt that the current system is familiar and that some people may find the new system more difficult.

**Question Five: Theme Analysis**

The following themes were prevalent in the free-text responses to this question:

- **Bidding Cycle**
  - Responses focused on the bidding cycle largely fell into one of five themes which will be explored more deeply later:
    - Increased Time
    - Increased Bids
    - Reduced Time
    - Prefer Current System

- **IT Access**
  - Many felt that having an online system is much simpler but were still concerned about those who have limited or no access to the internet. And worried that it could specifically affect those with learning disabilities.
    - “Please take into account that not everyone can get onto the internet everyday to check for new houses being put up! I think the way you do it now fits more people so if they only able to get to the internet once a week they are seeing all the properties available that week so they don’t miss out! If you put new house up daily for the week it will not be fair on them less able people! No change needed here! New property to be put on the Thursday and kept till Tuesday deadline works better for everyone”

- **Active Bidding**

- **ECA – Disability**
  - It was felt that changing from the current system can impact on those more vulnerable with disabilities
    - “Is it only online? What about those without access to internet or disability who can’t use it. Is there a phone number too? Does disability criteria include those with learning disabilities?”

- **Administration of Policy**

- **Waiting time for housing**
  - Respondents hope that this change will mean a quicker letting process and a reduction in queues.
    - “This will speed up the letting process and shorten queues for available properties”

The following graph shows the relative prevalence of these themes:
As previously mentioned, there were several comments which were focused on the bidding cycle

- **Bidding Cycle – Supportive**
  - Many of the respondents were supportive of the new proposal and felt that it’s a much fairer process that will ease the complicated current system for many. Allowing people more time to think about bidding on properties which are more suitable. And removing the need of having to wait until midnight to view new properties and get better chances on bidding.
    - “The chance to bid almost all the time and have more properties coming up would be good. When you are desperate and you wait till midnight on Wednesday evening, log in and check and see nothing suitable then having to wait a week to try again is heartbreaking when you are in a dire situation.”

- **Bidding Cycle - Prefer Current System**
  - Majority of the responses within this theme were concerned that changing the current bidding cycle would lead to confusion and have a greater impact on those which are more vulnerable or limited access to the internet.
    - “It is better to stick with the current system, so it’s not constantly updating. People with the inability to cope with these types of changes, due to mental health issues, could get confused & therefore be disadvantaged. You would be discriminating against them.”

- **Bidding Cycle – Reduce Time**
  - Respondents felt that the current cycle is too long and that those who are actively looking for social housing would bid when the bidding cycle opens.
    - “Give people less time to bid, if they need a property that bad then they will make sure it gets done within the time frame.”

- **Bidding Cycle – Increase Bids**
- Responses within this theme were positive about being allowed to increase the number of property bids.
- **Bidding Cycle – Increase Time**
  - This theme consists of the opinion that more time should be given to enable people to complete official documentation.

The following graph shows the relative prevalence of these themes:

![Graph showing the relative prevalence of themes](image)

**J. Question Five – Bidding cycle - VCOs and RPs Responses**

A total of 19 responded to question five, of whom 74% indicated Strongly Agree or Agree. By way of contrast, 16% Disagree. No ‘strongly disagree’ responses were received. The graph below details the number of responses in full.

![Graph of Q5 responses](image)
In comparison with the General Public, the VCOs and RPs are more positive towards the proposal in general. The General Public are more likely to ‘agree’ whilst the VCOs and RPs were more likely to ‘strongly agree’.

The themes from VCO and RP comments were mostly affirmations of support which spoke about different ways in which the new system would be beneficial. One response, however, did highlight how the proposed change would negatively affect those who did not have good access to the Internet.

- *We did note that the proposed change could impact negatively on those applicants without daily internet access, as they may miss new properties as they appear*
Question Six: - Number of refused offers
This question was concerned with the proposal to change the number of refused housing offers from the current number of five to a proposed three. Respondents were provided with the same options to respond as in previous questions.

K. Question Six – Number of refused offers - General Public Responses
A total of 448 people responded to this question, of whom:
- 67% indicated either Strongly Agree or Agree
- 20.7% indicated either Strongly Disagree or Disagree

The graph below shows the total count of respondents indicating each level of agreement:

Question Six: Summary of Theme Analysis
- As was the case for question four, a large theme was to do with the suitability of offers made, particularly when housing was poorly described on the Homefinder system.
- Respondents were generally supportive of the proposals since they felt that it would result in reduced waiting times.
- Some respondents, however, felt that reducing the number of refusals might lead to further pressure on applicants.

Question Six: Theme Analysis
The following themes were prevalent in the free-text responses on this proposal:
- Refused Offers – Suitability of Offer
As was the case in the discussion of question four, a large number of respondents expressed a worry related to the suitability of offers made on Homefinder. For some, this was related to poorly described properties:

- ‘I have been to an ‘adapted flat’ only to find it is full of steps, one to get in, a dozen in the garden, on to get down from the living room to the hallway. Houses are not transparent. There are no pictures, no details.’

- Others expressed that individuals have their own reasons for refusal which are particular to their own circumstances:

  - ‘People have reasons for declining properties, although you may not see it relevant to them it is important that they don’t live in a specific area due to work and school, also if they have had problems in the area before.’

- Refused Offers – Supportive
  - A large number of people were supportive of the reduction in the number of refused offers:
    - ‘Good idea, if they genuinely need housing they should be prepared to accept anything that is offered as long as it is reasonable’

- Waiting time for housing
  - The majority of respondents were in favour of the proposals since they felt that it would lead to a reduction in the waiting times for housing:

    - ‘Reducing the offers made will reduce the days houses are left unavailable. It will give others the opportunity to be housed quicker hopefully.’

- However, one respondent feared that it would not lead to a reduction in waiting times:

  - ‘Changing the number of refused offers will not reduce the time that properties will be left empty. It will only reduce the number of valid applications on the housing list. Applicants should be able to refuse any property they do not wish to live in, without restriction. What will reduce the time that properties are left empty is an automated refusal system, whereby refused properties are immediately offered to another applicant, of which there is no shortage. If a property is still left empty, the authority needs to ask themselves why nobody wants to live in it.’

- Disability
  - Responses in this theme were also to do with questions of the suitability of offers made.

- Refused Offers – Thought already was three
- A number of respondents were supportive of the proposals because they thought that the number of refusals was already at three.

- **Refused Offers – Less than three**
  - Some respondents wished for stricter requirements.

- **Refused Offers – Keep at five**
  - Some respondents felt that reducing the number of refused offers might lead to an increase pressure and stress upon applicants:
    - *‘Not sure the length of time a property stands empty will be reduced much. Applicants will be under more pressure and more stressed and therefore more likely to make a wrong decision’*

The following graph details the relative prevalence of themes:
L. Question Six – Number of refused offers - VCOs and RPs Responses

A total of 19 responded to question six, of whom:

- 68.4% indicated Strongly Agree or Agree.
- 10.5% indicated Disagree.
- No respondents indicated Strongly Disagree.

The graph below details the number of responses in full:
VCOs and RPs were supportive of the new proposal to reduce the number of refused offers but were keen that there might need to be more consideration of what constitutes a reasonable offer, as well as a strong appeal or review process which was viewed to be fair.

Comments Received

‘Citizen supports the proposed change to the bidding cycle. An any day advertising cycle means properties can be advertised at the earliest opportunity rather than landlords having to wait for a new cycle to begin. This also means that advertising cycles can close on any day meaning that the flow of shortlisting work to allocations teams is staggered. These changes should assist landlords to improve their relet performance. This change will also help to reduce inbuilt system waiting times for those in urgent housing need’.

‘Frontline workers welcomed the change of bidding cycle, moving away from all property bids ending on the same day each week. The current process can lead to clients who are unable to bid on a particular day missing all opportunities for an entire week. We did note that the proposed change could impact negatively on those applicants without daily internet access, as they may miss new properties as they appear. We recognised that changing the bidding cycle could make the bidding process more active for applicants, leading to more engagement with the process’.

<table>
<thead>
<tr>
<th>Comment Area</th>
<th>Count</th>
</tr>
</thead>
<tbody>
<tr>
<td>Refused Offers - Thought already was 3</td>
<td>1</td>
</tr>
<tr>
<td>Refused Offers - Less than 3</td>
<td>1</td>
</tr>
<tr>
<td>Waiting time for housing</td>
<td>1</td>
</tr>
<tr>
<td>Administration of Policy</td>
<td>1</td>
</tr>
<tr>
<td>Reviews</td>
<td>2</td>
</tr>
<tr>
<td>Refused Offers - Suitability of offer</td>
<td>3</td>
</tr>
</tbody>
</table>
Question Seven – Adapted properties
This question was to do with the proposal to start advertising adapted properties through Coventry Homefinder, rather than through a separate list. Respondents were able to indicate their level of agreement in the same way as in other questions.

M. Question Seven – Adapted Properties - General Public Responses
A total of 451 people responded to this question, amongst whom:

- 79.8% indicated they Strongly Agree or Agree
- 4.4% indicated that they Strongly Disagree or Disagree

The following graph shows the numbers of people who indicated each level of agreement.

![Graph showing numbers of people indicating each level of agreement.]

Question Seven: Summary of Theme Analysis
- The majority of respondents were supportive of the change, though many were keen that it be carried out properly.
- Some were concerned that the change might lead to people inappropriately bidding for adapted properties.

Question Seven: Theme Analysis
The following themes were prevalent in the free-text responses:

- Adapted Properties – Agrees
  - This theme was to do with those who agreed with the change and felt it would make accessing adapted properties easier.
- Adapted Properties – No need to change
- A number of people were worried that advertising adapted properties with other properties might lead people who do not require those adaptations to bid for them inappropriately.
  - ‘This will probably mean everyone has access to appropriate housing but some people will misuse the system’
  - ‘Why do you show adopted property to me if I don’t need it.’

- Administration of Policy
  - Some respondents were supportive of the policy but were anxious that it be carried out properly.
  - ‘Just make sure that the properties actually go to the people that genuinely need the adaptations. ... I think more of physical interview and assessments should be done.’

- Homelessness
- Communication
- Empty Properties
- Refused Properties – Suitability of Offer

The following graph shows the relative prevalence of themes:

N. Question Seven – Adapted Properties - VCOs and RPs Responses

A total of 19 responded to question seven, of whom:
- 89.5% indicated Strongly Agree or Agree.
5.3% indicated Strongly Disagree.

No respondents indicated Disagree.

The graph below details the number of responses in full:

This high level of agreement amongst VCOs and RPs correlates with the high level of agreement amongst the general public. The full-text responses were largely comments in support of the proposal, though one respondent did indicate that there may be a struggle related to those who have limited access to IT, as well as an opportunity where people could wrongly bid for adapted properties.
**Question Eight – Application Process**

This question was concerned with the proposal to have one application process with one form instead of the current two (where people apply and ask for a priority banding separately). Everyone will have their housing needs assessed when they apply. Respondents to this question were provided the same options to respond as in previous questions.

---

**O. Question Eight – Application Process – General Public Responses**

In total, 450 members of the general public chose to respond, amongst whom:

- 83% indicated either Strongly Agree or Agree
- 5% indicated either Strongly Disagree or Disagree

The following chart details the numbers of those who indicated each level of agreement to the proposal.

![Bar Chart](chart.png)

**Question Eight: Summary of Theme Analysis**

In general, respondents indicated:

- Support of this change, as it will reduce the stress on people on having to complete two sets of forms;
- Be of benefit and impact vulnerable families
- Fairer and faster application process for all

**Question Eight: Theme Analysis**
The following themes were most prevalent in the free-text responses to this question:

- **Application Process**
  - Responses focused on the application process largely fell into one of three themes which will be explored more deeply later:
    - Speed
    - Simplify
    - Supportive

- **Banding System**

- **Change of circumstances**
  - Respondents hope that the new system will take into account any changes within people’s circumstances, as by having one form, this could be missed.
    - “If only circumstances change and then u update people’s band automatically then that’s fine as there will be people who’s circumstances may change over the years so banning of priority will change too… so u will need to have a system where it will update too”

- **Waiting time for housing**

- **Administration of Policy**
  - The respondents hope that the new system will improve the whole process but weary on whether the administration system will ensure that they are up to speed with the clients’ housing needs and that banding will correspond with people’s circumstances.
    - “Common sense – such a long process at the minute. Should be a very in-depth form that takes into consideration everything that could affect someone’s housing situation. Domestic abuse/family breakdowns, infestations, problems with rented accommodation. DO NOT FORCE PEOPLE TO BECOME HOMELESS BEFORE YOU HELP, ASSES THEM AND TAKE INTO CONSIDERATION ALL FACTORS.”

The following graph shows the relative prevalence of these themes:
As previously mentioned, there were several comments which were focused on the application process.

- **Application Process – Supportive**
  - The majority are in support of this change as it will reduce the stress on people on having to complete two sets of forms. It will also reduce workload for the local authority as only one set of applications will need to be verified.
    - *“This will be better than the current system where they have to complete 2 separate forms, which are not linked to each other. We cannot guarantee that applicants will only have one application as they can currently add themselves to their partners application and vice-versa.”*

- **Application Process – Simplify**
  - Responses within this theme felt very positive towards simplifying the process as it will benefit vulnerable families by getting them housed quicker and less delays.
    - *“Less confusing for all, less chance for people to clog up the system hopefully be fairer one application form if found to be forging there application they are removed and not allowed to apply again for 10 years”*

- **Application Process – Speed**
  - Many responses within this theme believe it will be a great improvement to cut the banding decision time, and will be especially useful to those who are waiting on decision whilst living in hostels.
    - *“Streamlining this would help with housing people more quickly, additional forms create extra unnecessary red tape – by creating extra work for staff and applicants and in-turn creates delays housing people”*

The following graph shows the relative prevalence of these themes:
P. Question Eight – Application process - VCOs and RPs Responses

A total of 19 responded to question eight, of whom:

- 89.5% indicated Strongly Agree or Agree.
- 5.3% indicated Strongly Disagree.
- No respondents indicated Disagree.

The graph below details the number of responses in full:

VCOs and RPs, as with other questions, were therefore more supportive of the proposals. Full-text responses reveal that although VCOs and RPs are supportive of the proposals, they are concerned with the implementation of the policy. In particular, respondents expressed a wish for there to be assistance for people to complete their application if necessary, and that the application would be able to be completed over a reasonable timeframe which would give vulnerable applicants time to present evidence. Respondents were also keen that there be an opportunity for applications to be completed by those without IT access.
Question Nine – Annual Review Process

This question was concerned with the proposal to reduce the number of days people have to complete the annual review of their housing application before it is closed from 125 days to 28 days. As with other questions, respondents were able to indicate their level of agreement as either Strongly Agree, Agree, Neither Agree nor Disagree, Disagree, Strongly Disagree or Don’t Know.

Q. Question Nine – Annual review process - General Public Responses

A total of 450 people responded to the question, amongst whom:

- 58.6% indicated either Strongly Agree or Agree
- 18.9% indicated either Strongly Disagree or Disagree

The following chart details the number of respondents at each level of agreement.

<table>
<thead>
<tr>
<th>Strongly Agree</th>
<th>Agree</th>
<th>Neither Agree nor Disagree</th>
<th>Disagree</th>
<th>Strongly Disagree</th>
<th>Don’t Know</th>
</tr>
</thead>
<tbody>
<tr>
<td>109</td>
<td>155</td>
<td>82</td>
<td>49</td>
<td>36</td>
<td>19</td>
</tr>
</tbody>
</table>

Question Nine: Theme Analysis

The following themes were prevalent in the free-text comments on the proposal to change the annual review process:

- Annual Review – Increase Time
  - The largest theme throughout the text responses was to do with a desire to increase the proposed annual review time. Most were supportive of a reduction from 125 days but felt that 28 days was too short.
    - ‘I don’t see this as fair maybe to 50/60 days’
    - ‘I think you should get 60 days rather than 28. I think its a reasonable compromise, as the current review is along time.’

- Annual Review – Supportive
- Another theme was supportive of the reduction to 28 days, though some respondents thought that reminders and allowances for exceptional circumstances would be useful.

  - ‘Agree but people need to be sent a reminder that it needs completing’
  - ‘People are informed there form needs renewing, shouldn’t need to take so long except in certain situations like hospitalisation’

- Annual Review – Communication Method
  - This theme surrounded the need to help people in the renewal process through better communication and messaging.
    - ‘May be an idea that applicants are either emailed or text to inform them that their application needs to be reviewed?’

- IT Access
  - A number of respondents were concerned that not all applicants might have access to the internet:
    - ‘Again not every one can have access to the internet. Postal contacts for those who cannot use the present method many have to wait for a friend organic member to receive the reminder’

- Change of Circumstances
- Waiting time for housing

The following graph details the relative prevalence of themes in the free-text responses:
R. Question Nine – Annual review process - VCOs and RPs Responses

A total of 19 responded to question nine, of whom:

• 58% indicated Strongly Agree or Agree.
• 37% indicated Disagree or Strongly Disagree.

The graph below details the number of responses in full:

Whilst VCOs and RPs were in general supportive of this proposal, a number of full-text responses indicated that they would be in favour of a more modest reduction in timeframe for the annual review process. The time frame of 50 or 60 days was floated by some respondents. There was also a concern that for those for whom English is not a first language, additional assistance might need to be sought which might take a longer timeframe than 28 days.
**Question Ten: - Equalities**

The final question of the consultation asked respondents whether they felt that the proposals could have any impact upon different groups of people. Unlike previous questions, this question did not ask respondents to indicate their level of agreement to a specific proposal. Respondents were prompted to consider the protected characteristics of age, disability, gender reassignment, pregnancy and maternity, race/ethnicity, religion and belief, sex, and sexual orientation.

---

**S. Question 10 - Equalities**

A large number of themes were present within the free-text responses to this question, but in analysis, these were themed in relation to the specific equalities categories they corresponded to:

- **Disability**
  - A consistent theme in this question was to do with applicants with Mental Health Disabilities, Learning Disabilities and Autism. One respondent was concerned that the forms might not be user friendly for people with this kind of need:
    - ‘The process should be dyslexic friendly and should be simpler. A document explaining how to apply for professionals would also be helpful for those who are trying to support someone one homefinder. The system isn't set up for people with mental health conditions currently which needs to be addressed.’
    - ‘These changes might make some things difficult for less able & infirmed and those with other needs when making an application i.e some who need help to fill in forms may find 28 days too short. Others with more specific needs might find three offers too few.’
  - Respondents, however, for the most part did not mention specific ways in which people with these forms of disabilities would be affected, but they showed a concern that their needs to be borne in mind since they might otherwise be overlooked:
    - ‘I think these proposals will have a negative effect on autistic adults living at home who wish to have an independent life and be settled before their parents die. There are many autistic adults living at home who probably are not known to services because they are protected and supported by their aging parents. And because although their autism is “mild” they are still not able to hold down a job or employers are prejudiced and don’t want to employ them. If you look at public rentals Coventry most do not take rentees on Housing benefit/Universal credit which is what would be needed for an autistic person to move out of home’
  - People were more positive towards the policy with regards to physical disabilities and adapted properties:
- ‘It would be a positive change to make it easier for disabled people to access suitable properties.’

- Older People
  - Most of the responses to do with Older People were concerned with access to the internet and the application system:
    - ‘However, older people who are not computer literate and people who do not speak much english may struggle with the online applications and yearly renewal’
  - One respondent was concerned with the reduction in income Older People have when retiring:
    - ‘This could affect older people as they retire from work and receive reduced income. If they are in private rented accommodation they may become unable to afford the rent.’
  - Other responses were to do with ensuring that people receive offers of homes with necessary adaptations.

- Young People
  - Responses to do with Young People were to do with newly forming households of young people and young families moving out of the parental household, as well as younger families requiring bigger accommodation:
    - ‘This could have a bad effect on young couple trying to start a family without correct help from housing and ending up in hostels. This could also stop bigger families having correct size accommodation and living in small flats with large families and older people living 3 - 4 bedroom housing where they do not need the space for like other people it could also have a knock on effect and stop people with children with invisible disabilities to be given housing and have to live in flat that are no suitable for there childs needs.’

- Ethnicity
  - There were a number of responses to do with those who struggle with English language skills, as well as one response which talked about the cultural needs of individuals which can be met through living in certain areas:
    - ‘think you need to allow people more time to apply for housing, especially if they are not fluent in English’
    - ‘There are areas which have a built up community which meets with the individuals cultural needs, however not having a direct local connection will prevent them from being able to move to these areas.’

- Pregnancy and Maternity
Respondents were concerned about the changing needs of pregnant women:

- ‘I do think home finder need to take into consideration on people who are pregnant or have children more as their family is growing and the property in which they are in may not be suitable for them no more’

- Gender
  - Two responses were received which focused on the needs of women as mothers, whereas another focused on the needs of single men:
    - ‘need to ensure women especially with children are not adversely affected by any new housing assessment changes’
    - ‘Is there accommodation available for single men? Seems to be an underrepresented group’

- Domestic Violence
  - Respondents were keen that Domestic Violence victims were given a higher priority.
    - ‘If you are pregnant or in a volatile situation (bad family or relationship) these may need more priority due to the nature of need.’

- Care Leavers
  - One care leaver felt that the changes were very positive, though another respondent felt that additional support should be given for this group.
    - ‘What additional support is available for care leavers to enable them to become tenancy ready? They need help to do so.’

- Religion and Belief
  - Two responses were included in this theme, but their meaning was unclear:
    - ‘Helping people that are religious under 16’
    - ‘Religion and belief.’

The following chart details the relative prevalence of themes:
T. Question Eleven – Any other comments or alternative suggestions

This question encouraged respondents to make comments or alternative suggestions. Unlike previous questions, respondents were not asked to indicate their level of agreement for any particular proposal. The majority of responses were the same as others which had appeared in previous consultation responses, but a small number of new alternative proposals were advanced – these alternative proposals are shown in full below:

Consideration to demographics and time on the waiting list should be considered. It would be useful to see statistics on demographics of households in each band to affirm whether housing is allocated to various households (working/non working, health/non-health needs, etc) thereby avoiding clusters of society being grouped together and demonstrating that Housing is allocated fairly.

Take a close look at what the prevention team are doing with home finder.

Let's say you have 6, 3 bedroom houses, allow these to be allocated to different bands 2 for band 1, 1 for band 2 ect.

Register everyone with full bidding power and remove the agents from doing this (including those who are in hostels and hotels).

Clearly the prevention team need to be involved with bidding but only to oversee and check up their actually bidding because they come across as bullies pushing people into situations and properties which makes them scared or uncomfortable (forcing people into places that no-one wants just so someone is paying the rent/bills), greed.

Stop putting properties on home finder which are not even ready, haven't even handed the keys back and at times where people are still living there. Believe me I have actually went searching for some of these home finder homes and the worst was one which needed so much work, it would take over 3 months to complete and the Tennant's friend was ripping everything out the same week it was up for bidding and the keys were not to be handed in until a week after bidding finished? You want to reorganize us bidders, you need to crack a whip with whitefriers/citizen.

If you can't remove the agents from bidding on behalf of applicants, them limit how many bids they can do, to give everyone else a chance Or stop being dishonest, tell us all we can't bid anymore and tell us we will choose where you will all live and when you will get a home. Stick to your policy this time.

Incentive for more social housing and not affordable housing to be built.

Week to week you should be able to at least see your bid position actually going down, you don't, why? Sort it would you, it's soul destroying.

Stop telling people to find private housing when you are fully aware of the average prices and are fully aware how much you get towards help with private housing and what the massive discrepancy between the two are.

Personal interviews should be done on application and the applicants told within 28 days of receipt-the results of their application to go on the register.Accepted or not by an independent board.
As you know Liverpool had the scheme houses for a £1.00 with the criteria being that they had to renovated to a spec set by the council and funded by the purchaser, so if any properties in Coventry would fit this then worth a try. I think also have categories, I know you have bands, but maybe consider age ranges of the applicants this will potentially help in managing a bigger problem later and will also help with types of accommodation, for example over 55’s could go to retirement villages etc.

My alternative suggestion is to create an in-depth application form where you can really determine who is genuinely desperate for re-housing not just those who are homeless. To have such strict bands will only force people to become homeless on purpose so that they can escape their lives and get re-homed. Don't let this happen.

How about having a policy where instead of handing bags of public money to private investors so they can build a council house we didn't need (£40 million) or a hotel opposite a hotel (£3 million), we have a policy of starting up house co-operatives based on the Starley Road model.

Imagine for a moment, if Grenfell tower were a housing co-op, where the residents had ownership and control of the block while they lived there, where they decided for themselves what rents to charge, and what to do with that, via democracy, 1 resident, 1 vote.

At just £400 per flat per month which for Kensington would be insanely cheap, but, at £400 a month per flat the block would have raised £48,000 a month, I highly doubt they would have voted for flammable cladding over sprinklers, and from there they could actually invest themselves in new housing to expand tenant owned & ran co-op.

If you want to solve the housing crisis, put the people experiencing it in charge of solving it instead of handing our money over to semi privatised housing co-ops who mostly could not give a flying copulation about the residents needs so long as they keep paying.

It is about time public actually meant public, not government vs private.

Or would that be too much like common sense?

Add a home swap or exchange as the current version doesn’t work well.

5. Other consultation contact and/or feedback

- **Paper Surveys** – Paper surveys and relevant consultation information were made available in all 14 Council run libraries. In total 9 surveys were returned via this route. 21 paper surveys were returned following the mailout to specific applicants registered on Coventry Homefinder. In addition, 1 paper survey was returned to Broadgate House. Making a total of 31 paper surveys. These have been inputted onto the Let’s Talk survey for analysis purposes and are included in the overall total of consultation responses. 2 paper surveys was received after the consultation had closed.

- **Telephone** - Across the 8-week consultation survey period 39 calls were received about the Coventry Homefinder Review. 2 customers were sent a consultation pack by post and 2 customers received the details of the consultation via email. All other customer queries were answered by the Customer Services Advisor.
• **Email** - In total 6 emails to the Housing Strategy inbox were received. These emails questions and/or responses have been inputted into the Let’s Talk survey for analysis purposes and are included in the overall total of consultation responses.

• **Replies to Coventry Homefinder auto message** - In total 6 reply messages were received via the Coventry Homefinder Website. These messages were forwarded by the Coventry Homefinder Team to the Housing Strategy inbox to enable them to be input into the Let’s Talk survey for analysis purposes and are included in the overall total of consultation responses. Most of the comments received related to their personal circumstances and/or seeking confirmation that they were still able to bid for properties.

### 6. Key changes made to proposals following consultation

**Question One - Definitions**

The consultation survey asked respondents to consider three definitions to underpin the revised policy. There was concern raised regarding how the assessment of an applicant being ‘adequately housed’ would be carried out. As part of the application process it is intended that the application form will ask specific questions to assess whether an applicant is adequately housed and provide flexibility for an applicant to explain their individual circumstances.

The ‘low housing need’ definition generated most feedback. The actual term was disliked as it was felt it diminished the applicants housing circumstances and this has been changed following consultation to the ‘housing need’ definition. Some respondents felt the definition was too vague and suggested other situations that needed to be reflected or where further clarify was required. Amendments to the definition have been made to reflect this following consultation, for example applicants currently living together who wish to live separately (e.g. relationship breakdown).

Some respondents felt the ‘tenancy readiness’ definition was not required. This has been retained as it is required to support the proposed banding system.

Some respondents did misinterpret the definitions to be the new banding system. This is not the case. For example, some respondents thought that if they lived with friends or family in overcrowded conditions they would be placed in band four – low housing need. This would not be the case as housing need due to overcrowding receives greater priority within the banding system – band 2 or band 3 depending on level of overcrowding.

**Question Two – Qualification Criteria**

Following consultation all recommendations relating to qualification criteria are recommended for approval. Respondents raised some concerns regarding the ‘adequately housed’ definition but were supportive of having a qualification criteria requirement to have an assessed housing need. There was strong support to prioritise those people with a local connection to Coventry.

There was some disagreement with adding an asset and income cap or if this was added making sure that it was reflective of housing costs and income levels in the City. The income cap level was published in the draft policy document but not highlighted in the key changes document. The income cap of £50,000 is still recommended as it is reflective of income levels and housing costs.
but as part the assessment process consideration will be given to an applicant’s individual circumstances in terms of their income and expenditure.

**Question Three – Changing the banding system – ‘reasonable preference criteria’**

There was public support for changing the banding system. Understandably current applicants registered on Coventry Homefinder were concerned about the impact on current applicants and how they would personally be affected. All applicants will need to re-apply. Comprehensive reassessments will be carried out to determine whether current applicants still qualify, and if so what their assessed housing need is to determine their banding within the revised banding system. Where possible (depending on the information already held within the Housing and Homelessness Service) some applicants who already have a priority need may be automatically transferred to a new band. It is still recommended to change the banding system. Current applicants will have the right to appeal the decision as to whether they qualify or their banding. Current applicants who re-apply within the specified timescales will retain their effective date from the old scheme. It is recommended that the revised banding system including the reduced preference band is approved.

**Question four – The Reduced Preference Band**

There was broad support for the introduction of the reduced preference band although some respondents highlighted their disagreement with the different reasons you could be placed in reduced preference.

This particularly related to being replaced in reduced preference for refusing three suitable offers of accommodation when the information about individual properties is very poor and therefore it is currently difficult to make informed decisions. Where adverts were inaccurate and thus not suitable for the household needs then it would not count as a suitable offer. The new IT system will provide the opportunity to improve the information available about individual properties. Registered Providers are committed to improving the information they provide to support applicant decision making in order for them to let their properties quickly.

Whilst there was concern about the requirement for bands 1 and 2 to be actively bidding for suitable properties who lead to applicants losing community networks there was recognition that applicants in bands 1 and 2 had been assessed as being in urgent housing need and therefore should be actively seeking suitable accommodation. Where suitable accommodation hasn’t been advertised then an applicant would not be placed in reduced preference, for example an applicant requires a 4-bedroom property, and none have been advertised.

In relation to unsuitable to be a tenant due to unacceptable behaviour or rent arrears. Respondents were concerned that rent arrears are a common problem and how would people be supported to address these difficulties. The reduced preference band is intended to be a temporary band. Information and advice will be provided to support applicants to help them understand the reason the reduced preference has been applied and what they need to do to leave band and return to their normal band. This is to ensure that applicants are able to assess social housing in the future.

**Question five – Bidding Cycle**

There was significant support for changing the bidding cycle. There was concern about people being able to gain IT access. Whilst properties will be advertised any day (Monday to Friday)
properties will be available to bid on for 7 days which is longer than the current timeframe and will support those with limited IT access to still bid. The new IT system should also provide more opportunities for assistive/auto bidding for those applicants without IT access. The change to the bidding cycle is recommended for approval.

**Question six – Number of refused offers**

Reducing the number of refused offers is recommended following consultation. The public supported reducing the number of refused offers from 5 to 3. As highlighted previously in question four, the Council will work in partnership with the Registered Providers to improve the information available about individual properties. There was some concern that refusing offers would lead to applicants making pressured decisions. The Council will monitor refusals to provide additional advice to applicants and/or improve information about individual properties. Applicants will still have the opportunity within a specified timeframe to provide evidence that a refused offer was unsuitable and the reasons why before it counts as a refused offer under the policy. If an applicant is placed in reduced preference for refusal of three offers they will also have the right to request a review of this decision under the revised policy.

**Question seven – Adapted properties**

The consultation survey feedback indicated strong support for this change to how adapted properties are advertised and allocated. There was some concern that adapted properties would still be offered to people who do not require an adapted property. This scenario could still happen as Coventry Homefinder is a choice based letting scheme based on applicants bidding on properties. However adapted properties are in high demand and increased visibility of available properties should mean applicants requiring adaptations will bid on the adapted properties that become available. Following consultation this change is still recommended.

**Question eight – Application process**

There was significant support for changing the application process to a one stage process from both the general public, Registered Providers and from voluntary sector organisations. As respondents felt it would be a simpler and less stressful application process. Support would still be available for people to complete the form. The Council will work with the IT supplier to build a simple form whereby relevant guidance to support those completing it. Following consultation this change is still recommended.

**Question nine – Annual review process**

Whilst there was support for changing the length of time an applicant has to complete the annual review process from 125 days to 28 days. A number of consultation responses highlighted their concern that 28 days was too short for some vulnerable groups/people. A number of respondents suggested an alternative appropriate timeframe would be 50 or 56 days. Following consultation, the Council has amended its proposal. It is now proposed that applicants will be given 56 days to complete the annual review process.

**Question ten – Equalities**

The consultation statement has provided some examples of where respondents felt that there could be specific impacts for certain groups with protected characteristics. These have been considered and explored within the Equality and Consultation Analysis (ECA)– Appendix C of this
Overall it is considered that these proposals could have both a positive and negative impact. The ECA outlines where potential negative impact has been identified what mitigations could be put in place to mitigate these. Equalities will be monitored as part of implementation and a review of impact will be carried out one year following implementation.

**Question elven – Any other comments/suggestions**

This report presents a wide-ranging number of alternative suggestions which relate more generally to the availability of affordable housing and private sector housing. There are several suggestions relating to the implementation of the Housing Allocations Policy, including having an in depth application form. This will be required in order to assess an applicant’s housing need.

Some comments received relate to applicant’s dissatisfaction on bidding processes for homelessness households. These have been fed back to the operational team.

Some suggestions relate to when properties are advertised when they still require repairs. These comments have been fed back to Registered Providers as they make the decision as to when to advertise their properties. In addition, ‘home swap’ exchange sites operate nationally and cannot be locally determined.
Appendix 1 – List of organisations and/or registered providers who responded to consultation. – Where the organisational name was given

Registered Providers

- Accord – Organisational Response
- Citizen – Organisational Response
- Coventry and Warwickshire YMCA (this registered provider does not currently let properties through Coventry Homefinder)
- Orbit – Organisational Response
- Midland Heart – Organisational Response
- Nehemiah Housing – Organisational Response
- Stonewater Housing Association – Organisational Response
- Citizen – Employee Response
- Midland Heart – Employee Response
- Unknown Response (organisation name not provided)

Voluntary and Community Sector and other organisational responses

- St Basil’s
- Citizen’s Advice – Employee Response
- Citizen’s Advice – Employee Response
- Citizen’s Advice – Employee Response
- Coventry Citizen’s Advice – Organisational Response
- Coventry Haven Women’s Aid
- Crisis Skylight
- Coventry Frontline Network
- National Energy Action
- Prefer not to say
In line with the principles of decision making outlined in the City Council Constitution, the Council will ensure that its decision making is open and transparent, and that due regard is given to the Council's obligations and desire to promote equality of opportunity and equal treatment.

Form 1

This part must be completed and before formal consultation is undertaken and must be available during the consultation stage.

Author of this document: Gemma Tate

Name of ECA and Service: Coventry Homefinder Policy – Housing and Homelessness Service

Head of Service: Jim Crawshaw

Date of completion: October 2019

Background to the planned changes

1. What is the background to the planned changes? Why is this change being considered? If further information is available on the different scenarios that have been considered as part of this work, provide a link to the public document which contains this information.

Coventry City Council no longer owns or manages council housing stock, following the large-scale voluntary transfer (LSVT) of all council housing to Citizen Housing (formally Whitefriars Housing Group) in 2000. However, the Council still has a duty to produce a policy on how social housing is allocated in the City which sets out how applicants are prioritised and how allocations are made, and which complies with Part 6 of the Housing Act 1996 (as amended by the Housing Act 2004 and the Localism Act 2011). The Policy must have regard to the guidance document 'Allocation of Accommodation: guidance for local housing authorities in England' (DCLG 2012).

As the Council no longer holds its own housing stock, allocations under the policy are carried out through nominations from the Council to Registered Providers of social housing. The Coventry Homefinder Choice Based Lettings Policy sets out the policies and processes by which applicants will be prioritised for an allocation of social housing, and how available social housing vacancies are advertised and let.

The last wholesale review of the Coventry Homefinder Policy was in 2014, although the Policy was slightly amended in 2018 to reflect legislative changes required by the Homelessness Reduction Act 2018.

The housing and homelessness landscape has changed significantly since 2014. The Homelessness Reduction Act 2017 (HRA) came into force in April 2018 and placed new statutory duties on Councils in England to provide enhanced advice and assistance to people who are homeless or threatened with homelessness. The first year of HRA resulted in a notable increase in demand on the Housing

1
and Homelessness Service, including an increase in the number of homeless households living in temporary accommodation.

There are currently 13,824 households registered on Coventry Homefinder (as at 27 September 2019). The table below shows the number of households in each current band:

<table>
<thead>
<tr>
<th>Band</th>
<th>Number of households</th>
</tr>
</thead>
<tbody>
<tr>
<td>1a</td>
<td>602</td>
</tr>
<tr>
<td>1b</td>
<td>127</td>
</tr>
<tr>
<td>2a</td>
<td>1682</td>
</tr>
<tr>
<td>2b</td>
<td>402</td>
</tr>
<tr>
<td>2c</td>
<td>122</td>
</tr>
<tr>
<td>3a</td>
<td>10,576</td>
</tr>
<tr>
<td>3b</td>
<td>310</td>
</tr>
<tr>
<td>blank</td>
<td>2</td>
</tr>
<tr>
<td>total</td>
<td>13,824</td>
</tr>
</tbody>
</table>

In 2018/19 only 1446 households were housed via Coventry Homefinder across all accommodation types. This means that demand for social housing greatly outweighs the number of properties that become available in any given year.

The review of the Coventry Homefinder Policy provides the opportunity to review how the allocation of social housing is prioritised within Coventry. This review is also one of the key actions within the city’s Housing and Homelessness Strategy 2019-2024.

The proposals for change are wide ranging and include:

- Who can register on Coventry Homefinder.
- Who will receive priority within the ‘banding system’ in the future – including a reduction in the number of bands and the introduction of a reduced preference band.
- How to apply and what supporting information will be needed.
- Changing the number of times people can refuse an offer of housing.
- Ensuring that those registered are actively using Coventry Homefinder.
- Changing how adapted properties are advertised/allocated.

One of the proposals relates changing the qualification criteria for accessing the Housing Register. The proposed changes mean that only applicants with an assessed housing need will be able to register. The current policy has Housing Need ‘Priority bands’ 1a to 2c and no priority bands (including no housing need) in 3a and 3b.

For applicants with a housing need but no local connection (3a) they will still be able to apply in certain circumstances. Applicants with no housing need and no local connection (3b) will no longer be able to apply.

These changes would mean that the register is focused on supporting those applicants (households) in the greatest need of housing. In addition, an asset/income cap would be introduced which means
that those applicants who have the financial means to afford other types of housing will no longer be able to register for social housing.

If the qualification criteria and/or the banding system is changed following consultation and approval by Elected Members, there would need to be a comprehensive review of all Housing Register applications to reassess them. Currently applicants need to apply for a priority banding, and we believe there will be many households in the non-priority bands (3a and 3b) who have a housing need, but it is not possible to quantify how many until reassessments have taken place.

The proposals will impact all people currently registered on Coventry Homefinder and potentially those people who may wish to register for social housing in the future.

2. **Who do you need to consider as part of this ECA?**

   *stakeholder analysis*
   - Applicants for social housing in Coventry (this may include applicants who currently live outside of Coventry)
   - Potential applicants for social housing in Coventry (this may include applicants who currently live outside of Coventry)
   - Current or future applicants for social housing who require an adapted property (also known as disabled persons accommodation)
   - Registered Providers of social housing in Coventry

**Pre-Consultation Engagement**

*This section refers to any activities that took place (such as briefings, meetings, workshops, scoping exercises etc) with stakeholders before the formal consultation period.*

3. **What engagement activities took place prior to formal consultation and what feedback (if any) was received in relation to equality issues?**

The review of the Coventry Homefinder Policy began in June 2019 and between June and October 2019 there has been significant engagement activity with Registered Providers in the City. There was overwhelming agreement that the review needed to be undertaken. A Steering Group was set up with Council Officers, nominated Registered Providers and an advice agency representative representing the City’s Welfare Forum Working Together Group.

All 9 Registered Providers were invited to an initial workshop. In total there have been 4 workshops with 6 Registered Providers involved, including the biggest three Registered Providers in the City (Citizen Housing, Orbit and Midland Heart). The other Registered Providers involved were Stonewater, Accord and Clarion.

Since July 2019, there has been a page on the Council’s 'Let’s Talk' Engagement Platform seeking feedback on the current policy and for people to share their ideas for change via quick polls and a question and answer tool. As at 29th October 2019 there were 621 visits to the page by 502 people.

In addition, the review has sought feedback and ideas from the City’s Homelessness Forum and Frontline Network throughout the review process.

The legislative guidance relating to social housing allocations specifies that any scheme must give reasonable preference to certain categories of people and there is a link between some of these categories and the protected characteristics under the Equality Act, for example the need to move on
Coventry City Council
Equality and Consultation Analysis (ECA) Form

medical or welfare grounds which could encompass people with a disability as some people may require an adapted property.

Analysis of Impact

In this section please ensure that you consider the three aims of the general duty as they affect protected groups. These groups are:

Age
Disability
Gender reassignment
Marriage/Civil Partnership
Pregnancy/Maternity
Race
Religion/Belief
Sex
Sexual Orientation

The three aims of the general duty require that a public authority, in the exercise of its functions, must have due regard to the need to:

- Eliminate discrimination, harassment and victimisation
- 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

4. Outline below how this proposal/review could impact on protected groups positively or negatively, and what steps/mitigations (if any) could be taken to reduce any negative impact that has been identified.

Note – when identifying potential impacts below, please only include impacts that may exist over and above general impacts that may affect the wider community/population. (For example, a reduction in grant to Coventry Citizens Advice would affect all service users through a reduced level of first line advice being available to all – but it would affect the following groups more: age, disability, gender and race as they represent a larger proportion of the clients who use the advice service.)

Age

To register for Social Housing, you normally have to be aged 18+ in order to sign a tenancy agreement with a Registered Provider. Most applicants on Coventry Homefinder are aged between 20 and 54 years (82%) There are currently 1702 (12%) of applicants who are aged 55 and over and of those 317 (19%) of applicants are registered in a priority need band. Some properties that become available on Coventry Homefinder are age restricted properties, these are normally advertised for people aged
over 55. 13% of the 1400 properties advertised on Coventry Homefinder in 2018/19 were age restricted properties.

Disability

When applicants currently register on Coventry Homefinder they are not asked to declare whether they or a member of their household have any disabilities. Disability is only recorded on the Homefinder Register when an applicant requires a property with specialist adaptions. A disability or medical condition of an applicant may also be declared by an applicant when they apply for a priority banding, such as medical priority. This information is held on the applicant's individual case record. This information is not collated centrally by the current IT system.

There are currently 54 applicants registered for purpose build wheelchair housing, 58 applicants registered for partly adapted houses and 99 applicants registered for partly adapted flats. 52% of applicants registered for purpose build wheelchair housing are aged 45 year and over.

Adapted properties are currently allocated outside of the main policy and are not currently advertised on the Coventry Homefinder Website. The current allocation process is resulting in adaptations being removed from properties because Registered Providers have been unable to match an applicant to the property. One of the proposals within the review is for all adapted properties to be advertised via the Coventry Homefinder website so that people needing an adapted property can see which properties become available and then decide whether to bid. It is hoped that this change will result in more people with disabilities finding social housing to meet their housing needs.

Pregnancy/Maternity

568 applicants currently registered on Coventry Homefinder have declared a pregnancy either at point or application to the register or by subsequently updating their application. This represents 4% of applicants on the overall register.

Sex

8236 (60%) applicants on Coventry Homefinder are female.

Race (Ethnicity)

There are a total of 13,824 applicants/households on the Housing Register, of which 3863 applicants (28%) are from an ethnic minority background. The biggest minority ethnic group (13%) are people from Black/Black British – African backgrounds. These is reflected across all bands 7 bands (1a, 1b, 2a, 2b, 2c, 3a, 3b) within the current Coventry Homefinder Policy. This minority ethnic group are overrepresented on the Housing Register when compared to the overall Coventry population whereby 5.6% of people identify as Black/African/Caribbean/Black British ethnicity.

Under the current policy the 'priority bands' are (1a to 2c) of which there is 909 (31%) out of 2959 applicants identifying as an ethnic minority group.

215 applicants (35%) in band 1a are from an ethnic minority background. Of which 18% are people from Black/Black British – African backgrounds. When compared to the Housing Register as a whole this shows that people from minority ethnic groups are overrepresented in the top band. One of the reasons for this is that households from BME backgrounds, including Black/Black British African are overrepresented within households who are accepted as homeless, which is another reasonable preference category in band 1a.
Coventry City Council
Equality and Consultation Analysis (ECA) Form

There is only one change within the proposed banding system which specifically affects 1a and 1b applicants. Currently applicants who have priority for severe overcrowding 2+ bedrooms are placed in band 1a (top priority). It is proposed they would be placed in band 2 (the 2nd highest priority). Data analysis was recently undertaken (July 2019) on the households who currently had overcrowding priority in band 1a. There were 96 households, less than 1% of people on the Housing Register. 53 of these applicants (55%) were from ethnic minority backgrounds. Applicants from ethnic minority backgrounds are culturally more likely to live in larger family groups (e.g. having larger families and have multiple generations living in the same property when compared to other ethnic groups). Data from the British Social Attitudes Survey (2017) showed that of those people answering the survey, 13% of the respondents from a Black origin lived in a household with 5 or more people compared to 5% of the respondents of White origin.

The new banding system still gives highest banding priority to those applicants who are under occupying by 2 or more bedrooms to encourage people to release larger family homes for other families in housing need such as those living in overcrowded conditions. Another potential mitigation is that within the proposed Coventry Homefinder Policy, in properties have two living rooms, one of these rooms could be used as a downstairs bedroom with the agreement of the Registered Provider which would support those living in overcrowded accommodation to move to larger accommodation. This provision is not included in the current policy.

In band 3b, applicants with no housing need and no local connection, 44.5% of applicants are from an ethnic minority background. In the proposed new banding system band 3b would no longer exist. Applicants would only be able to remain on the register if they could demonstrate their housing need (like all applicants on the register) and their exceptional circumstances. As at 27th September 2019 only 132 bids for housing have been placed by applicants in band 3b out of a total of 9217, less than 1% of the total bids received. This could indicate that a number of applicants in this band are not actively seeking housing in Coventry.

No data is currently held for the protected characteristics of Marriage/Civil Partnership, Religion/Belief and, Gender Reassignment and Sexual Orientation. A question is asked during the application process about gender reassignment, but it has not been possible to obtain this data from the reporting module.

5. Are there any other vulnerable groups that could be affected? i.e. deprivation, looked after children, carers.
   Also include any information about the health inequalities/Marmot implications of this proposal. Contact Caroline Ryder (caroline.ryder@coventry.gov.uk) or Hannah Watts (hannah.watts@coventry.gov.uk) in Public Health for more information.

Looking After Children / Children’s Social Care

The current Coventry Homefinder Policy gives priority to housing needs as a result of being a ‘looked after child’ in Coventry, they are currently placed in band 2a (3 band out of 7 bands). The proposed changes to the banding system would benefit looked after children from Coventry, as once they are ‘tenancy ready’ they would receive band 1 (top band) priority.

In addition, the proposed revised policy gives a new priority for families who are being reunited following children being returned from care of the Local Authority within the Urgent Housing Need due to Social and Welfare issues. These families will be eligible for band 1 (top band) priority where this
Coventry City Council
Equality and Consultation Analysis (ECA) Form

is dependent on a change of accommodation and this has been confirmed by the Children’s Social Care Department. Similarly, approved fosters and adopters who require more appropriate accommodation would be eligible for band 1 (top band) if this need is confirmed by the Children’s Social Care Department.

Deprivation

The proposed revised policy includes a new qualification criterion linked to an applicant’s income and/or assets. It is proposed that applicants with assets and/or income above £50,000 per year will no longer be able to register on Coventry Homefinder, unless they wish to register for age restricted properties, sheltered housing or shared ownership. This proposed change is to ensure that the Housing Register is for those in greatest need of affordable housing.

The proposed ‘low housing need’ definition includes applicants who are or could potentially experience financial difficulty if they remained in their current accommodation and therefore need to move to more affordable accommodation in the medium to long term. This ensures that people can still register for social housing if their main housing need is linked to requiring affordable housing.

The proposed change to include a qualification criterion based on housing need will also support those applicants who face multiple layers of deprivation to access the Housing Register and have their housing need assessed at point of application, rather than having to currently apply for priority banding.

Whilst access to the Housing Register does not guarantee applicants being housed, it is felt the revised application process, qualification criteria and banding system will provide those with the greatest housing need a greater chance of being housed.

6. What are the gaps in evidence? Can this be addressed during the consultation stage?

In this section, re-state those protected characteristics for which there is no data available. In addition, outline if there are any plans to collect further data during the consultation stage (through surveys, on-site sampling etc). If it is unlikely that additional data will be available to inform this ECA, then include a commitment statement in this section along the lines of “following on from this ECA, once the new service is implemented/commissioning process undertaken”, a specific requirement to collect and analyse relevant equalities data will be included in management information processes / service specifications”. *delete as appropriate

No data is currently held for the protected characteristics of Marriage/Civil Partnership, Religion/Belief and Sexual Orientation. A question is asked during the application process about gender reassignment, but it has not been possible to obtain this data from the reporting module. We will attempt to collect further data during the consultation.

The Housing and Homelessness Services will be re-tendering for its IT system later this year. This means that the service will be able to improve its data collection of equalities data.

7. What are the likely impacts of this project/review on staff from protected groups?

Council Staff who work in the Housing and Homelessness Service are not affected by the review of the Coventry Homefinder Policy.
Form 2

This section should be completed AFTER any consultation has been concluded.

Author of this document: Gemma Tate

Date of completion: January 2020

Potential Impacts – further information

8. Referring to the information detailed in question 4 of ECA Form 1, state if the potential impacts have been confirmed. Also detail below any additional information about potential impacts that has been highlighted during any consultation.

As part of the consultation survey respondents were asked to say what impact they thought the proposals would have for different groups of people. The responses were themed two ways. Firstly, in respect of impacts for any groups with protected characteristics and secondly themed by the proposals or topic their comment related to (more detail on these proposals related themes is contained in the accompanying consultation statement).

<table>
<thead>
<tr>
<th>What impact do you think these proposals could have for different groups of people?</th>
</tr>
</thead>
<tbody>
<tr>
<td>ECA - Religion and Belief</td>
</tr>
<tr>
<td>ECA - Domestic Violence</td>
</tr>
<tr>
<td>ECA - Gender</td>
</tr>
<tr>
<td>ECA - Pregnancy and Maternity</td>
</tr>
<tr>
<td>ECA - Ethnicity</td>
</tr>
<tr>
<td>ECA - Young People</td>
</tr>
<tr>
<td>ECA - Older People</td>
</tr>
<tr>
<td>ECA - No impact</td>
</tr>
<tr>
<td>ECA - Disability</td>
</tr>
<tr>
<td>ECA - Negative Impact</td>
</tr>
<tr>
<td>ECA - Positive Impact</td>
</tr>
</tbody>
</table>

Respondents to the consultation felt there were both positive and negative impacts of the proposals with some people stating they felt the proposals would have no particular impact on certain groups as they affected everyone equally.

In summary – the negative impacts identified during consultation were:
Coventry City Council
Equality and Consultation Analysis (ECA) Form

- For households currently on the register with no local connection to Coventry
- Households on low incomes who cannot afford housing in the private rented sector
- Concern that proposals would increase homelessness and/or overcrowded households where affordability of housing is their primary housing need
- Negative impact on those vulnerable groups (elder people and people with disabilities who need support to apply and bid for properties)

In summary – the positive impacts identified during consultation were:

- That a households housing need would be assessed at application and support those in greatest housing need to find social housing
- Applicants felt the applicant process would be simpler
- Support people to get housed quicker
- Support the City to relieve homelessness

In terms of protected characteristics specific impacts (negative and positive) were identified for:

<table>
<thead>
<tr>
<th>Protected Characteristic</th>
<th>Positive Impact</th>
<th>Negative Impact</th>
<th>Potential Mitigation</th>
</tr>
</thead>
</table>
| Disability               | - Changes to how adapted properties are let  
                          - One application process will make it simpler for people with disabilities |
|                          |                 | - People with disabilities may require more time and help to register, bid for properties and renew application  
                          - Need to consider impact of all types of disabilities (physical disabilities, mental health and hidden disability such as autism)  
                          - The change to the bidding cycle will make it very difficult to continue to send the weekly property list to c16 people |
|                          |                 |                 | - Revised timescale for renewing housing application will be longer following consultation feedback (56 days instead of 28 days)  
                          - Application form / change of circumstances form will ask for information and/or supporting evidence of all types of disability when assessing housing need  
                          - Revised IT system and potential opportunities for auto/assistive bidding to support those with limited IT access and/or support networks or those who receive the weekly property list (will be dependent on IT supplier) |
| Age – Older People       | Changes to how adapted properties are let |
|                          |                 | - Older people may require additional support to register, bid for properties and renew application |
|                          |                 |                 | - Revised IT system and potential opportunities for auto/assistive bidding  
                          - Revised timescale for renewing housing application |
<p>| Age – Young People       | Positive impacts for care leavers who are tenancy ready |
|                          |                 | - Young people would be offered less properties (those living with family or friends or |
|                          |                 |                 | - Care leavers and those in supported accommodation will have access to support to |</p>
<table>
<thead>
<tr>
<th>Category</th>
<th>Impacts Identified</th>
<th>Analysis</th>
</tr>
</thead>
<tbody>
<tr>
<td>Ethnicity</td>
<td>No specific positive impacts identified</td>
<td>- For people who want to move to Coventry to access certain community/cultural groups</td>
</tr>
<tr>
<td></td>
<td></td>
<td>- People with no local connection but an identified housing will still be able to register in exceptional circumstances</td>
</tr>
<tr>
<td></td>
<td></td>
<td>- Revised IT system and potential opportunities for language translation (will be dependent on IT supplier)</td>
</tr>
<tr>
<td></td>
<td></td>
<td>- Revised timescale for renewing housing application</td>
</tr>
<tr>
<td></td>
<td></td>
<td>- Revised IT system and potential opportunities for auto/assistive bidding (will be dependent on IT supplier)</td>
</tr>
<tr>
<td>Pregnancy and Maternity</td>
<td>No specific positive impacts identified</td>
<td>Suitability of current accommodation for growing families or those who are expecting</td>
</tr>
<tr>
<td></td>
<td></td>
<td>- Pregnancy is taken into consideration for the criteria for bedroom size from 26 weeks of pregnancy</td>
</tr>
<tr>
<td></td>
<td></td>
<td>- Using rooms flexibly in larger homes (e.g. those with two living rooms) will support more larger families to find suitable accommodation</td>
</tr>
<tr>
<td>Sex/Gender</td>
<td>No specific positive impacts identified</td>
<td>Need to ensure women and children would be adversely affected by the changes</td>
</tr>
<tr>
<td></td>
<td></td>
<td>- The housing need of all household members would be taken into consideration as part of the assessment process – 60% of applicants on Coventry Homefinder are female as it is not expected this proportion would</td>
</tr>
<tr>
<td>Religion and Belief</td>
<td>No specific positive impacts identified</td>
<td>No specific negative impacts identified in consultation responses</td>
</tr>
<tr>
<td>---------------------</td>
<td>----------------------------------------</td>
<td>---------------------------------------------------------------</td>
</tr>
<tr>
<td>Deprivation and/or income</td>
<td>• Reassessment process of current applicants will help identify people whose current housing needs are not accurately reflected in their current band</td>
<td>There was general concern about introduction of the asset and income cap within the qualification criteria and that this shouldn’t penalise low income households</td>
</tr>
<tr>
<td></td>
<td>• Bidding cycle changes will help people on low incomes with gaining IT access</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Prior to consultation, the Part 1 of this Equality and Consultation Analysis identified a potential negative impact for people from BME backgrounds particularly those who identify as Black African from changing the banding system. Currently applicants who have priority for severe overcrowding 2+ bedrooms are placed in band 1a (top priority). It is proposed they would be placed in band 2 (the 2nd highest priority). People from BME backgrounds are over represented within households who are currently awarded priority for being overcrowded by 2+ bedrooms. Post consultation this impact remains unchanged.

As part of the consultation survey respondents were asked a number of equality questions related to the protected characteristics under the Equality Act 2010.
Coventry City Council
Equality and Consultation Analysis (ECA) Form

- **Sex** – 72% (331 people) were female, 23% male, 0.1% identified in a different way and 2.7% preferred not to say – More females than males are registered on Homefinder as the lead applicant – the consultation response reflects this.
- **Age** – 87% of people were aged 25-64
- **Ethnicity** – 65.5% (295 people) were White British or White Irish Background with 30% from BME backgrounds with 5% preferring not to say – 28% of those households registered on Coventry Homefinder are from BME backgrounds – 30% of respondents to the survey indicated they were from BME groups, so the response is representative.
- **Disability** – 20% of people considered themselves disabled (with a range of physical and mental disabilities indicated) – Disability data is not currently captured within the Coventry Homefinder system – as part of the consultation we were proposing changes to the adapted property register and sent paper copies of the survey to this group alongside people we assistive bid for and those who receive the weekly property list by post.
- **Gender reassignment** – 3.7% (16 people) of respondents stated yes with 5.3% (23 people) preferred not to say
- **Marriage and Civil Partnership** – this information is not currently collected by Coventry Homefinder but as part of the consultation a broad range of relationship statuses declared by 444 respondents who completed this question.
- **Religion and Belief** – this information is not currently collected by Coventry Homefinder but 65% of people who answered this question (449 responses) stated they had religious belief
- **Sexual Orientation** – this information is not currently collected by Coventry Homefinder but 10% of respondents indicated their sexual orientation to be a gay man, a gay woman/lesbian, asexual, bisexual, queer or other.
- **Care Leavers** – 5% (22 people) stated they were care leavers or soon to be leaving care. Care Leavers were a specific group who would be impacted by changing the banding system. – Care Leaver views are similar to other respondents.
- **Armed Forces** – 7% of people stated they had or currently served in the armed forces with 5% preferring not to say – Armed Forces and former Armed Forces personal are a specific group who have ‘additional preference’ in terms awarding priority under within a housing allocation scheme. – This group were less enthusiastic about the changes to the qualification criterion – even though they would be exempt from the local connection rules.

The consultation responses for people from BME backgrounds has been analysed to understand their specific views on the proposed changes and whether there are any specific differences compared to other respondents on changing the banding system. The views of Black African respondents are not dissimilar to other groups. People from Asian backgrounds are slightly less enthusiastic about changing the banding system but only a small number of respondents from these communities responded to the survey.

**No specific impacts have been identified during consultation for – Gender reassignment, Marriage and civil partnership or sexual orientation.**

**Outcome of equality impact**

9. Indicate which of the following best describes the equality impact of this project/review:
Coventry City Council
Equality and Consultation Analysis (ECA) Form

There will be no equality impact if the proposed option is implemented

There will be positive equality impact if the proposed option is implemented

There will be negative equality impact if the proposed option is implemented but this can be objectively justified

There will be both positive and negative impacts if the proposed option is implemented

Summary of ECA

Write a paragraph below which summarises the key aspects of this ECA.

This paragraph should be included in the Equalities/EIA section of any Cabinet/Cabinet Member Report.

The equalities analysis pre and post consultation has clearly indicated both potential positive and negative equality implications of the proposed changes to Coventry Homefinder (Social Housing Allocations Scheme). The potential positive equality implications could apply across all protected characteristics, particularly in respect of the changes supporting those in greatest housing need to be offered a suitable property. Assessing housing need at point of application is also seen as a positive change for all applicants including those with protected characteristics.

The specific changes to the way adapted properties are advertised and allocated is considered to be a very positive change for older people and people with disabilities who require an adapted property. People with disabilities are particularly supportive of this change. The changes to the banding system are positive for young people who are leaving care but there is concern that younger people living with friends and family or in shared accommodation are less likely to be offered housing.

The changes to the banding system will potentially negatively affect people from BME backgrounds who are:

a) currently living in overcrowded conditions or
b) who are currently registered in band 3b (no housing need and no local connection to Coventry) who no longer be able to register under the proposed qualification criteria.

Mitigations identified for overcrowded households include the revised policy providing flexibility as to how properties with two living rooms could provide additional bedroom provision with the agreement of the registered provider. As part of the implementation process all current applicants will need to re-apply and as part of this process the housing need of the household will be assessed. This will give applicants the opportunity to have their housing need assessed as where exceptional circumstances are identified they will still be able to re-register (as long as they need the other qualification criterion – applied to all applications).

As part of the implementation process equality impacts will be assessed. This will be supported by a new IT system currently being procured for the Housing and Homelessness Service which will improve the collection and analysis of equalities data. A review of the revised policy will be undertaken one year after implementation which will include a review of actual ECA impact.
Coventry City Council
Equality and Consultation Analysis (ECA) Form

Approvals from Director and Cabinet Member

Name of ECA Author Gemma Tate
Date 27.01.2020

Director: David Ashmore – Director of Housing and Transformation

Cabinet Member: Cllr T Khan

Please detail below any committees, boards or panels that have considered this analysis.

<table>
<thead>
<tr>
<th>Name</th>
<th>Date</th>
<th>Chair</th>
<th>Decision taken</th>
</tr>
</thead>
</table>

Next steps

Please send this completed ECA to the Insight Team as follows:

Wendy Ohandjanian (wendy.ohandjanian@coventry.gov.uk tel. 7697 7076)

Jaspal Mann (jaspal.mann@coventry.gov.uk tel. 7697 7109)
### Appendix D – Current and Proposed Banding Systems - (‘reasonable preference criteria’)

#### Current Banding System

<table>
<thead>
<tr>
<th>Level of Need</th>
<th>Homefinder Band</th>
<th>Housing Need Category</th>
</tr>
</thead>
<tbody>
<tr>
<td>Exceptional need</td>
<td>1A</td>
<td>Statutorily Homeless (including National Witness Mobility Scheme)</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Exceptional housing needs due to health difficulties</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Severe Overcrowding – require an additional 2 or more bedrooms</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Tenants of partner housing providers who need to move to enable a redevelopment scheme to go ahead</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Tenants of partner housing providers who are under-occupying a property by 3 or more bedrooms</td>
</tr>
<tr>
<td></td>
<td>1B</td>
<td>Tenants of partner housing providers who are moving to release specialist disabled persons accommodation</td>
</tr>
<tr>
<td></td>
<td></td>
<td>People fleeing violence, harassment or abuse</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Tenants of partner housing providers who are under-occupying a property by 2 bedrooms</td>
</tr>
<tr>
<td></td>
<td></td>
<td>People with an urgent medical need who are also overcrowded</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Extreme Unsanitary conditions causing severe health and safety hazards in the household</td>
</tr>
<tr>
<td>Urgent need</td>
<td>2A</td>
<td>Urgent housing needs due to health difficulties</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Short term hostel dwellers</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Housing needs arising from Social and Welfare issues</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Overcrowding – require an additional 1 bedroom</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Housing needs as a result of being a “Looked After Child”.</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Unsanitary/unsuitable conditions affecting the health of the household or causing health and safety hazards</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Tenants of partner housing providers who are under-occupying by one bedroom</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Review of Band 1A applicants</td>
</tr>
<tr>
<td>Non-Urgent need</td>
<td>2B</td>
<td>Low level housing needs due to health difficulties</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Households who need to move to a particular locality, where failure to achieve this would cause hardship to themselves or to others.</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Homelessness Prevention and Relief</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Review of Band 1B applicants</td>
</tr>
<tr>
<td></td>
<td>2C</td>
<td>Intentionally Homeless Households</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Homeless households who do not have a priority need</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Households where a main housing duty has been discharged due to the refusal of an offer of suitable accommodation</td>
</tr>
<tr>
<td>No priority need</td>
<td>3A</td>
<td>No housing need with a local connection</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Housing need but no local connection</td>
</tr>
<tr>
<td></td>
<td>3B</td>
<td>No housing need with no local connection</td>
</tr>
<tr>
<td>Level of Need and Homefinder Band</td>
<td>Housing Need Category</td>
<td></td>
</tr>
<tr>
<td>----------------------------------</td>
<td>-----------------------</td>
<td></td>
</tr>
<tr>
<td><strong>Urgent Housing Need</strong></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
| Band 1                           | Statutorily Homeless (Main Housing Duty accepted as homeless household). This also includes the National Witness Mobility Scheme.  
Urgent housing need due to health and/or social care difficulties  
Urgent housing need due to Social and/or Welfare issues (including unsanitary conditions, fleeing violence, moving due to redevelopment, moving to release disabled persons and/or adapted accommodation, Approved fosters carers and adopters who require more appropriate accommodation, Families who are being reunited following the children being returned from the care of Local Authority)  
Coventry Care Leavers who are assessed as tenancy ready  
Tenants of partner housing providers who are under-occupying a property by 2 or more bedrooms |
| **High Housing Need**            |                       |
| Band 2                           | People living in named short-term supported accommodation including hostels, and who are assessed as tenancy ready  
Overcrowding – require an additional 2 or more bedrooms  
Homelessness Relief (households at relief duty stage of the Homelessness Reduction Act)  
Tenants of partner housing providers who are under-occupying by 1 bedroom |
| **Medium Housing Need**          |                       |
| Band 3                           | Homelessness Prevention (households at the prevention stage of the Homelessness Reduction Act)  
Homeless households who do not have a priority need  
Housing need due health and or social care difficulties  
Housing need relating to Social, Welfare or Hardship issues  
Overcrowding – requires 1 additional bedroom |
| **Housing Need**                 |                       |
| Band 4                           | Housing need with local connection (including newly forming households – applicants living with friends or family wanting their own accommodation or applicants currently living apart who want to live together, applicants who are or could potentially experience financial difficulty if they remained in their current accommodation, applicants who are currently living together who want to live separately, applicants who are currently living in a property in disrepair)  
Coventry Care Leavers (who are not tenancy ready) or Care leavers with no local connection)  
People living in named short-term supported accommodation including hostels who are not tenancy ready  
Intentionally homeless households  
Housing need - no local connection (exceptional circumstances) |
| **Reduced Preference**           |                       |
|                                 | Reduced priority status due to unacceptable behaviour or rent arrears  
Households where the main housing duty has ended due to refusal of a suitable offer of accommodation  
Households who have refused 3 offers of accommodation under the Homefinder Policy  
Households in bands 1 and 2 who have not actively bid for suitable accommodation |
Name of Cabinet Member:
Cabinet Member for Education and Skills - Councillor K Maton

Director Approving Submission of the report:
Deputy Chief Executive (People)

Ward(s) affected:
All

Title:
European Social Fund 2014-2020 – European Structural & Investment Funds (ESIF) – Coventry
ESF Second Round Applications

Is this a key decision?
Yes - the proposed activity has the potential to affect all wards within the City and expenditure is
in excess of £1m

Executive Summary:
The 2014-2020 European Structural Investment Fund (ESIF) Programme was launched in March
2015. The ESIF Programme will now run until 2023 in the UK. A cabinet report was approved on
26 November 2015 for successful projects from the first round of funding under the programme.
In that report it was noted that further rounds of funding would be available and that the Council
would seek to apply in those rounds. This report seeks approval for those applications that have
been submitted under a new second round.

The Council has a strong track record in securing European funds in recent years and has
secured in excess of £65m from the European Structural Funds since 2007.

However, the current EU funded employability support Programmes are due to come to an end
following an agreed extension (until 31 March 2020 for the Priority 1.1, 1.2 and 1.4 programmes
and 31 December 2020 for the Priority 1.3 programme). The Employment and Skills Service has
therefore submitted bids for Phase 2 programmes which will run from 1 April 2020, or on a date
to be agreed as soon as Funding Agreements have been issued, until 31 December 2023.
Across all the bids the amount of ESF Grant being bid for in the Phase 2 round is £11.38m.

The further Council led applications have been submitted in the new programme under the Active
Inclusion (Priority 1.1), Access to Employment (Priority 1.4), Sustainable Integration of Young
People (Priority 1.2) themes and under the Youth Employment Initiative (Priority 1.3). The total
value of all of these applications (Grant plus Match Funding from the City Council and delivery
partners) is £20.56m with nearly 55% of these costs being made available from the ESIF grants to support those applications.

The Council has already taken a leadership role by bringing partners together from across the Coventry & Warwickshire LEP area to develop projects and programmes that will lead to improved employment prospects across the City and the sub region. The Council has an outstanding track record of securing, managing and delivering EU-funded employability support programmes.

This report provides information on each of the new bids and requests Members’ approval for the Council to act as accountable body guarantor and delivery partner for these funding programmes.

Recommendations:

Cabinet is asked to:

1. Note the success of European Funding via ESIF in delivering the City’s economic aspirations and continue to support the Council bidding for European Funds that are still available via the ESIF programme and which will support the objectives of the Economic Growth & Prosperity Strategy 2018 - 2022.

2. Recommend that Council:

   I. Approve (if successful) the drawdown of the ESF grant funding, totalling up to £11.38m from ESIF to be utilised in delivering the City’s priorities as set out in this report.

   II. Delegate authority to the Deputy Chief Executive (People) in consultation with the Director of Finance and Corporate Services and the City Solicitor to negotiate final terms and approve entry into:

       (a) the grant funding agreement to secure the ESIF funding with the City Council acting as the Accountable Body for the funding: and
       (b) back to back funding agreement with such delivery partners as is deemed necessary to deliver the City’s priorities as set out in this report.

Council is asked to:

1. Approve (if successful) the drawdown of the ESF grant funding, totalling up to 11.38m from ESIF to be utilised in delivering the City’s priorities as set out in this report.

2. Delegate authority to the Deputy Chief Executive (People) in consultation with the Director of Finance and Corporate Services and the City Solicitor to negotiate final terms and approve entry into:

   (a) the grant funding agreement to secure the ESIF funding with the City Council acting as the Accountable Body for the funding: and
   (b) back to back funding agreement with such delivery partners as deemed necessary to deliver the City’s priorities as set out in this report

List of Appendices included:

None
Background papers:
None

Other useful documents:

Economic Growth and Prosperity Strategy 2018-2022
West Midlands Local Industrial Strategy 2019
Coventry & Warwickshire LEP Area ESIF Strategy
European Structural Investment Fund (ESIF) Funding Applications for Approval 2016

Has it been or will it be considered by Scrutiny?
No

Has it been or will it be considered by any other Council Committee, Advisory Panel or other body?
No

Will this report go to Council?
Yes – 25th February 2020
1. Context (or background)

1.1. In 2014, applications opened for the new programme of European Structural and Investment Funds (ESIF). The programme has now been extended with a new round and will run until December 2023. In the first round, funding for projects running from January 2016 to December 2019 were made available (Phase 1). Following national delays with contracting, these programmes have been extended to 31 March 2020.

1.2. ESIF includes both the European Regional Development Fund (ERDF) and the European Social Fund (ESF). ERDF is designed to fund economic development projects, while ESF provides support to help people find sustainable employment.

1.3. An Enviable Track Record

1.3.1. The Council already manages and delivers a number of highly successful programmes to help local residents where they need additional support to access local jobs. The City Council has been responsible for managing well over £65m of EU funding since 2007 alone. A range of current ESF Phase 1 programmes, managed by the Employment and Skills Service and delivered by the City Council and a delivery consortium have been operating since January 2016. These Programmes have delivered high quality support to help disadvantaged and disengaged Coventry residents to move toward and into sustainable education, training activities and consequently toward and into sustainable jobs.

1.3.2. Residents assisted include people who are Black and Minority Ethnic Origin (BAME) (35% of total participants assisted), women (49%), young people age 15-24 who are not engaged in education, employment or training (NEET) (or are at risk of becoming NEET) (61%), people with disabilities (33%), people who are lone parents (8%). Support services have been based at the high profile Council managed Job Shop in Bull Yard in Coventry City Centre. This facility has become nationally renowned and offers an innovative physical hub from which the ‘spoke’ support activities right across Coventry have been coordinated and delivered. Activities have been delivered by a wide range of local delivery partners chosen for their track records of successful delivery and their specialist skills in supporting the most disadvantaged local residents to overcome often complex and multiple barriers to labour market participation.

1.3.3. Across these existing Phase 1 programmes the Council Employment & Skills Service has managed £11.1m of ESF funds, with a total of £6.7m received in ESF grant. Up to 30th September 2019, these budgets have delivered:

- 4,505 participating Coventry residents, with multiple and enduring barriers to labour market participation, who were either unemployed or inactive when initially registered on programmes.
- 869 participants directly assisted to get a job.
- 105 participants directly assisted into an apprenticeship.
- 372 participants directly assisted into education or vocational training courses.
- 1,346 participants achieved one or more positive outcomes as a direct result of programme intervention.
- Ongoing work is continuing with this caseload. It is anticipated a significant increase in positive outcomes will be achieved once the relevant support has been completed and the detailed evidence required by Department of Work and Pensions (DWP), who manage the ESF funds, has been collated and submitted. Activities on the Ambition
Programme are scheduled to continue until December 31, 2020 and activities on Exceed, ConnectMe and Routes to Ambition are scheduled to continue until March 31, 2020.

1.4. Phase 2 Programme

1.4.1. Further calls for applications were announced between January and August 2019 under the priority axis of Skills for Growth and Inclusive Labour Markets. Projects can run from April 2020, or on a date to be agreed as soon as Funding Agreements have been issued.

1.4.2. All Phase 2 programmes must be completed by the 31st December 2023 with final claims expected no later than February 2024.

1.4.3. Coventry City Council has submitted bids for ESF Phase 2 for the current Programmes under the Access to Employment for Job Seekers and Inactive People, Inclusive Labour Markets, Sustainable Integration of Young People into the Labour Market and Active Inclusion Investment Priorities. This report provides information on each of these bids and requests Members’ approval for the Council to act as accountable body for these funding programmes.

1.4.4. There is EU and Government commitment to continue to fund these programmes of activity to their closure in December 2023, as detailed below:

The Head of the European Social Fund Division at the Department for Work and Pensions (DWP) has recently written to all ESF Grant recipients to confirm that the Government has decided to step down preparations for leaving the EU without a deal and therefore ‘no deal’ preparations for the ESF Programme are also stood down. As a result, the Programme will continue under the existing rules and guidance until its closure.

Under the terms of the Withdrawal Agreement, the UK will continue to participate in EU annual budgets funded under the current Multiannual Financial Framework (2014-2020 MFF). The UK will continue to make its contribution and get receipts from current EU programmes under the normal rules. This includes all European Structural and Investment Funds (ESIFs), including the ESF Programme. As a result, even after the end of the implementation period, the ESIF programmes under the current MFF will continue to receive funding via the usual processes for their lifetime.

This means that:

- ESF grant recipients should continue to deliver activities and submit claims to the ESF Managing Authority in line with their ESF Funding Agreement.
- Applications for ESF will be progressed as usual. This applies to either existing applications or bids for funds made via the ESF Reserve Fund.

2. Options considered and recommended proposal

2.1. The first option could have been to decline the opportunity to apply for ESIF funding. This was quickly discounted because the Council has an excellent track record of using European funding to run successful projects to help local residents gain access to local jobs. ESIF is the primary source of employability support funding currently available to support people into jobs, and job focused learning and training.
2.2. If Cabinet do not approve this report then we would miss out on funding earmarked for the applications listed in the section below. Funding of £20.56m for employment and skills support would be lost.

2.3. An alternative option was to seek to join ESIF bids as a delivery partner rather than as lead bidder. This approach could provide some benefits in terms of reduced financial risk and programme management costs whilst still making EU funding available for some of the Council’s activities. However, as a City there is not another appropriate partner with the track record, financial capacity, local knowledge and network presence to effectively manage a large diverse portfolio of specialist programmes like the one we are proposing. Other organisations also had the opportunity to form partnerships and directly bid for the funds, however, they were unable to take up that opportunity. Therefore, this option has been discounted.

2.4. The recommended option is for the Council to act as lead applicant for ESIF projects, and to act as accountable body for this funding programme with grant agreements in place with partners as described in sections 4 & 5 below. This maximises the EU grant available. This also allows the Council to take a leadership role, working with key partners, in how ESIF projects are delivered. As previously mentioned, the Council has an excellent track record of managing grants of this type using them to help people into jobs and promote economic growth for Coventry. These bids will allow this work to continue in the new projects/programmes.

2.5. **Summary of Bids**

2.5.1. The Council Employment & Skills Service is bidding for £20.56m of funding for Coventry (£11.38m Grant) in the Calls for Phase 2 of ESIF funding.

2.5.2. The bids have been submitted to the DWP for ESF. Full applications have been completed. The figures quoted below and elsewhere in this report may vary during the final negotiation process.

2.5.3. **Succeed**

2.5.3.1. Succeed will provide barrier breaking support to improve the employability of long-term unemployed people. This by providing focused specialist employability support to address gaps in basic skills needs and specific customised support.

2.5.3.2. Succeed will marshal the expertise of 5 delivery partners to:

- Tackle barriers to work in a holistic and integrated way: including the engagement and provision of integrated support for financial inclusion, employment and basic skills;
- Providing additional and/or more intensive and flexible support as needed;
- Improve the integration of disabled people into employment, education and training;
- Target specific groups of local residents including Black and Minority Ethnic (BAME) people and women;
- Deliver programmes of motivation and confidence building and specialist support around physical and mental health, substance misuse, dealing with criminal convictions, caring responsibilities, financial inclusion, IT, numeracy, literacy, ESOL, raising awareness of the world of work, employer expectations, volunteer placements and employer visits.
- Deliver vocationally focused skills provision so participants can better ‘compete in the local labour market and adapt to changes in the economy’.
2.5.3.3. The Council will act as accountable body for the project value of £4.82m - ESIF grant value of £2.40m (50%). The project will be delivered over a 3 year period and it is anticipated that the project will support 1,390 females and 1,410 males with particular emphasis on Black and Minority Ethnic groups (19% of participants), those aged over 50 (21%) and people with ill health or disability (25%).

2.5.3.4. Result indicators for the project are listed below.

<table>
<thead>
<tr>
<th>Unemployed and Inactive Coventry residents Supported</th>
<th>People into Employment (Unemployed &amp; Inactive) on leaving the programme</th>
<th>People into Employment (Unemployed &amp; Inactive) six months after leaving the programme</th>
<th>People age&gt; 50 supported</th>
<th>People with disabilities supported</th>
<th>ESIF Grant</th>
</tr>
</thead>
<tbody>
<tr>
<td>2,800</td>
<td>723</td>
<td>619</td>
<td>588</td>
<td>701</td>
<td>£2,409,976</td>
</tr>
</tbody>
</table>

2.5.4. Routes2

2.5.4.1. Routes2 will support 1,605 young people age 15-24 with multiple barriers to move into participation in employment, education and training. Particular emphasis will be given to those in Year 11 and struggling to achieve at school and those who are newly NEET or at risk of becoming so.

2.5.4.2. Routes2 will further enhance the offer from the current ‘Routes to Ambition’ Programme.

2.5.4.3. The 7 specialist partners will offer extensive local knowledge, established networks and in-depth understanding of the needs of disadvantaged young people in Coventry.

2.5.4.4. Additional support will subsequently include:

- Creative engagement and mentoring – Finding new and innovative ways to attract and engage young people to the wide range of services on offer and guiding and supporting to raise their aspirations and enable them to realise their potential.
- Support for newly arrived teenagers and young adults who struggle to integrate into the educational system and thus become disassociated from the world of training and work.
- Additional support for BAME cohorts; support for migrants.
- Money Advice – to enable participants to understand the financial long-term advantages of employment, and to be able to manage their own finances independently.

2.5.4.5. Cohorts to be supported will also include care leavers, lone parents, offenders and those with learning disabilities/ difficulties, as well as those facing financial exclusion, lack of basic skills in Maths, English and IT and those lacking motivation and confidence.

2.5.4.6. The Council will act as accountable body for the project value of £2.85m - ESIF grant value of £1.42m (50%). The project will be delivered over a 3 year period and it is anticipated that the project will support 786 females and 819 males.
2.5.4.7. Result indicators for the project are listed below.

<table>
<thead>
<tr>
<th>Unemployed and Inactive People Supported</th>
<th>People into Employment (Unemployed &amp; Inactive) on leaving the programme</th>
<th>People into Employment (Unemployed &amp; Inactive) six months after leaving the programme</th>
<th>People age &lt; 24 supported</th>
<th>Participants gaining new basic skills</th>
<th>ESIF Grant</th>
</tr>
</thead>
<tbody>
<tr>
<td>1,605</td>
<td>973</td>
<td>546</td>
<td>1,605</td>
<td>121</td>
<td>£1,424,067</td>
</tr>
</tbody>
</table>

2.5.5. **Ambition2**

2.5.5.1. The Ambition2 programme will deliver new, high quality services to support 2,500 young people aged 16-29 who are either not in employment education or training (NEET), or are at risk of becoming so, into jobs, education and learning. The programme will address the support needs of young people with multiple barriers to participation in employment, education and training.

2.5.5.2. The Employment & Skills Service have established a new extended consortium of 8 specialist third sector, private and statutory providers who all have substantial delivery expertise and in-depth knowledge of the needs of young people in Coventry. The partners offer is based on extensive local knowledge, established networks and in-depth understanding of the needs of these specific cohorts in Coventry. The ‘Ambition’ branding therefore will remain so that customers are able to associate with the new programme. In response to this call the Employment and Skills service (ESS) will significantly enhance the current offer.

2.5.5.3. The Council will act as accountable body for the project value of £6.63m - ESIF grant value of £4.41m (66.6%). The project will be delivered over a 3 year period and it is anticipated that the project will support 1,250 females and 1,250 males.

2.5.5.4. Result indicators for the project are listed below.

<table>
<thead>
<tr>
<th>Unemployed and Inactive People Supported</th>
<th>People into Employment, Education or Training or gaining a Qualification (Unemployed &amp; Inactive) on leaving the programme</th>
<th>People into Employment (Unemployed &amp; Inactive) six months after leaving the programme</th>
<th>People age &lt; 29 supported</th>
<th>Participants in continued education, training programmes leading to a qualification, an apprenticeship or a traineeship six months after leaving</th>
<th>ESIF Grant</th>
</tr>
</thead>
<tbody>
<tr>
<td>2,500</td>
<td>1,103</td>
<td>850</td>
<td>2,500</td>
<td>375</td>
<td>£4,419,690</td>
</tr>
</tbody>
</table>

2.5.6. **Connect2**

2.5.6.1. Connect2 will focus on those people who are more difficult to support as they experience multiple and complex barriers to getting a sustainable job.

2.5.6.2. Connect2 will provide tailored support to 2,434 unemployed and economically inactive people. Priority groups include people with disabilities, people with mental health difficulties, women, Black and Minority Ethnic (BAME) people and people aged over 50 living in Coventry.
2.5.6.3. Specialised provision will be offered through a consortium of 11 experienced organisations at various locations in the city using their own innovative approaches. Each organisation will use their specialist skills to address the often unique and complex barriers which deter and prevent specific cohorts of long-term unemployed and inactive people from engaging in employment focused programmes. People will benefit from a person-centred approach with an emphasis on providing intensive, flexible and tailored support which meets individual needs.

2.5.6.4. Engagement activity will combine proven approaches that partners have previously implemented with new and creative ways of reaching out to people. Specialist programme delivery staff will support with the engagement and recruitment of participants to the project. Staff will work in neighbourhood locations within the priority wards to encourage people to engage with the programme.

2.5.6.5. The delivery partners will identify and address particular barriers such as disability, physical and mental health, substance misuse, criminal convictions, care responsibilities, financial exclusion, lack of basic skills in Maths, English and IT, motivation and confidence.

2.5.6.6. The Council will act as accountable body for the project value of £6.26m - ESIF grant value of £3.12m (50%). The project will be delivered over a 3 year period and it is anticipated that the project will support 1,205 females and 1,229 males.

2.5.6.7. Result indicators for the project are listed below.

<table>
<thead>
<tr>
<th>Unemployed and Inactive People Supported</th>
<th>Participants in education / training / gaining a qualification or in employment inc self-employment or job search upon leaving</th>
<th>Participants in employment, including self-employment, six months after leaving</th>
<th>Participants with childcare needs receiving childcare support</th>
<th>Participants age &gt;50</th>
<th>ESIF Grant</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>2,434</td>
<td>845</td>
<td>535</td>
<td>772</td>
<td>513</td>
</tr>
</tbody>
</table>

2.5.6.8. Table 1 – Summary of CCC Led Bids

<table>
<thead>
<tr>
<th>Programme</th>
<th>Coventry Residents Supported</th>
<th>Coventry residents in employment / education / training upon leaving</th>
<th>Coventry residents in employment / education / training six months after leaving</th>
<th>ESIF Grant</th>
</tr>
</thead>
<tbody>
<tr>
<td>Succeed</td>
<td>2,800</td>
<td>723</td>
<td>619</td>
<td>£2,409,976</td>
</tr>
<tr>
<td>Routes2</td>
<td>1,605</td>
<td>973</td>
<td>546</td>
<td>£1,424,067</td>
</tr>
<tr>
<td>Ambition2</td>
<td>2,500</td>
<td>1,103</td>
<td>1,225</td>
<td>£4,419,690</td>
</tr>
<tr>
<td>Connect2</td>
<td>2,434</td>
<td>845</td>
<td>535</td>
<td>£3,128,709</td>
</tr>
<tr>
<td>Total</td>
<td>9,339</td>
<td>3,644</td>
<td>2925</td>
<td>£11,382,442</td>
</tr>
</tbody>
</table>
3. Results of consultation undertaken

3.1. The ESIF bids have been developed a consortium created and led by the Council Employment & Skills Service. These partnerships bring together a broad representation of organisations working on employability support activities in Coventry. This includes public, private and third sector organisations. Partners involved in the development of the various ESIF applications are:

- Coventry City Council – Employment & Skills Service (including Adult Education Service)
- Coventry City Council – Work Related Learning Service
- Coventry City Council – Internally Provided Disability Service
- PET-Xi Ltd
- Working Actively to Change Hillfields Ltd (WATCH)
- Coventry University Group
- Coventry University – (Disruptive Media Lab)
- CU Social Enterprise CIC
- Foleshill Womens’ Training
- Rethink Mental Illness
- Coventry Refugee and Migrant Centre
- NewStart4u CIC
- Life Path Trust Ltd
- Coventry and Warwickshire Chamber Training
- The Princes Trust
- Prospects Ltd

3.2. Each of these partners have had the opportunity to influence the ESIF bid in the relevant themes, allowing the views of a wide range of people and businesses from Coventry to be considered in the project design.

3.3. The ESIF bids deliver against Coventry & Warwickshire’s Strategic Economic Plan (SEP), which underwent a significant consultation process. They will also deliver against the Coventry & Warwickshire’s ESIF Strategy, which again was developed after extensive consultation.

4. Timetable for implementing this decision

4.1. Should the ESIF bids be successful, the DWP (Managing Authority) will issue Funding Agreements which will allow the Programmes to start on April 1st, 2020 or on a date to be agreed as soon as Funding Agreements have been issued. Once this is confirmed, each delivery partner will be given a Grant Aid Agreement that sets out their contribution to project in terms of match funding and outputs and sets out how much ESIF funding will be available to them.

4.2. The Programmes will run until December 2023. While in previous EU funding programmes, the Council has successfully negotiated extensions of both time and funding on numerous occasions, this will be end of ESF funding. All ESF project delivery has to end by 31/12/2023.

4.3. For Connect2, Routes2 and Succeed delivery will end on 31/03/2023 with final claims being submitted by the 30/06/2023. For Ambition2 delivery will end on 31/12/2023 with final claims being submitted by 31/03/24.
5. Comments from Director of Finance and Corporate Services

5.1. Financial implications

The Council is proposing to be the accountable body for each of the four Second Round ESIF 2014-20 programmes as specified in the report, totalling £20.56m costs (£11.38m ESF grant) if approved. Whilst there is some financial risk, there is no immediate implication as a result of being the accountable body. These schemes will bring significant economic benefit to the city. Grant risk is discussed further in Section 6.2.

The ESIF applications in this round will provide a total of up to £5.74m in grant funding towards the Council’s costs between April 2020 and December 2023.

Table 2 (below) illustrates that the total match funding provided by the Council for salaries and associated overheads is £4.65m for Phase 2 applications. This reflects current revenue budgetary provision for the 3 year grant programme period. In addition, Delivery Partners will be providing £4.53m in match funding over the same period.

All programme funding is revenue. The Employment and Skills Service Programme Management Team will monitor this to ensure grant is fully maximised where possible.

Table 2 – Summary of Financial Profiles for Each Application (£m)

<table>
<thead>
<tr>
<th></th>
<th>ESIF Grant</th>
<th>CCC Match</th>
<th>Delivery Partner Match</th>
<th>Total</th>
</tr>
</thead>
<tbody>
<tr>
<td>Succeed</td>
<td>£2,409,976</td>
<td>£1,224,610</td>
<td>£1,185,366</td>
<td>£4,819,952</td>
</tr>
<tr>
<td>Routes2</td>
<td>£1,424,067</td>
<td>£837,798</td>
<td>£586,269</td>
<td>£2,848,134</td>
</tr>
<tr>
<td>Ambition2</td>
<td>£4,419,690</td>
<td>£1,095,291</td>
<td>£1,115,217</td>
<td>£6,630,198</td>
</tr>
<tr>
<td>Connect2</td>
<td>£3,128,709</td>
<td>£1,488,279</td>
<td>£1,640,431</td>
<td>£6,257,419</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td><strong>£11,382,442</strong></td>
<td><strong>£4,645,978</strong></td>
<td><strong>£4,527,283</strong></td>
<td><strong>£20,555,703</strong></td>
</tr>
</tbody>
</table>

If grant is successfully awarded, this commits Coventry City Council as accountable body to identify match funding for the duration of the project. Council match, which is already secured as part of the Council’s commitment to the Economic Growth and Prosperity Strategy, is required at varying levels for the individual projects depending on the type of activity being funded, the source of funding, and the contributions from delivery partners. Should the level of available CCC match funding change for any reason, it will be necessary to find alternative match within the programmes in order to maintain the level of ESIF grant that has been requested.

5.2. Legal implications

If approved, the Council will act as the accountable body for the ESIF projects on the terms of the EU and DWP requirements. The Council will be issued with a grant offer containing terms and conditions. The terms and conditions will be devolved to any partners within the various programmes. These will ensure appropriate conditions and obligations which are imposed upon the Council are passed to the grant recipients who receive the funding for delivering projects. The Council has power to act as guarantor under Section 1 of the Localism Act 2011.
6. **Other implications**

6.1. **How will this contribute to the Council Plan ([www.coventry.gov.uk/councilplan/](http://www.coventry.gov.uk/councilplan))?**

At its highest level the ESIF strategy delivers part of the Coventry & Warwickshire Local Enterprise Partnership's Strategic Economic Plan.

The ESIF projects proposed here will all contribute to the Council’s Plan aim to make ‘sure that residents share in the benefits’ helping local people into jobs through improving employability through access to skills and qualifications and by creating routes into work, including apprenticeship, placement and new job opportunities.

The ESIF projects will also make a significant contribution towards delivering the outcomes of the Council’s Economic Growth and Prosperity Strategy and the West Midlands Industrial Strategy, by tackling skills deficiencies, creating opportunities and pathways for unemployed and inactive people to be supported into work. Proposed activity will also support ‘connecting our poorest communities’ economic growth’ by ‘removing or managing barriers to work’ for the most vulnerable Coventry residents.

The Succeed project will engage and address the needs of Coventry’s most vulnerable communities by developing supported pathways into education, training and employment.

The Connect2 project will engage and address the needs of Coventry’s most vulnerable communities by developing supported pathways into education, training and employment.

The Ambition2 and Routes2 projects will positively impact on the pre-NEETS and NEETS figures in the city by working with the Work Related Learning Service and delivery partners to develop supported pathways into education, training and employment for young people who are NEET or at risk of becoming NEET.

Overall the ESIF projects aim to make a strong contribution to the Council’s aims to promote the growth of a sustainable Coventry economy in which all residents and businesses can benefit.

6.2. **How is risk being managed?**

The Council will act as the accountable body for a total £20.56m of ESIF funding in this second round of Programmes and will be responsible for ensuring that the funding is spent in compliance with the programme’s regulations. This will include ensuring that partners use their grant correctly.

Managing these complex programmes with several partners does present some risk, but the Council has a good track record for maintaining and achieving significant financial controls and well established procedures for handling public funds and these will be applied to the ESIF projects in order to ensure that the best possible value is achieved for the EU’s investment in the schemes. Risk will be managed using the following approach:

**Grant Aid Agreements** will be issued to partners which will pass on the risk of any funding claw back to partners in the event of non-compliance on their part.
Each project will establish an Operational Group of management-level representatives from each of the delivery partners. These groups will be chaired by Council officers and will manage risk by ensuring that partners are on course to achieve their output targets and are keeping records correctly etc.

In addition, each project will be overseen by a single Strategic Board chaired by the appropriate senior manager from the Council to ensure that risk is managed across all Programmes.

The Council’s Employment & Skills Service will be the specialist service delivering the employment, skills and business support services from within the Council. With an enviable track record in delivery the service is highly competent in dealing with European Funds. The team has significant knowledge in this area and has experience of delivering and managing complex, multi-partner European Social Fund projects.

The accountable body function will be completed by the Council’s Employment & Skills Service within the People Directorate. This is a specialist function which is responsible for managing large employability support funding contracts. The team has a great deal of experience in this area and has managed defrayal of ESIF funds worth £11.1m since 2016 and is highly regarded by the Government’s DWP Team. The Employment & Skills Service will be the specialist service delivering the employability support services from within the Council. With an enviable track record in delivery, both these service areas are highly competent in dealing with EU Funds.

The Council’s External Funding and Business Growth Team will provide technical assistance to the various ESIF projects. This is a specialist function which is responsible for managing large economic development funding contracts. The team has a great deal of experience in this area and is currently managing funds worth £100m+ and is highly regarded by the Government’s Local Growth Team.

6.3. What is the impact on the organisation?

HR Implications

To ensure successful delivery of these large projects and the Council’s ability to provide an adequate accountable body function, additional staff resources will be required. Some staff are already in place for the existing externally-funded projects. All new staff will be recruited on a temporary fixed term contract basis.

6.4. Equalities / EIA

The ESIF projects are likely to have a positive equalities impact. Many of the interventions are designed to assist people from groups which may otherwise struggle to access support. For example, each programme will run customised services designed to help Black and Minority Ethnic people, young people, lone parents, newly arrived refugees and migrants, people who are disabled and people with long term health conditions to access jobs and employability focused learning and training opportunities.

6.5. Implications for (or impact on) climate change and the environment

The projects will have a positive environmental impact. Each project bid has included a full Environmental Sustainable Development Policy and Plan. This includes specific actions. It will be required that the Programme Management Teams, delivery partners
and all programme staff deliver on these. The Programme Management Teams and Management staff within the Employment and Skills Service will also maximise efforts to ensure that each programme minimises any negative environmental impacts. Actions will include, raising awareness of sustainability among staff and participants, minimising waste and increasing recycling, reducing energy use, reducing travel and promoting sustainable travel options, for example by encouraging project staff to use public transport and keep electronic records where possible.

6.6. **Implications for partner organisations?**

Securing this ESIF funding will allow the Council to part-fund the activities of a large number of important partner organisations working in employability support. Funding will be passed on to partner organisations through these programmes, giving them focused funding for a three-year period to deliver significant and aligned outcomes for residents in Coventry.
Report author(s):

**Name and job title:**

Kim Mawby, Head of Employment and Skills Service
Dean Atkinson, Business Development Manager (Programme Development), Employment and Skills Service

**Directorate:**
People

**Tel and email contact:**
Tel: 02476 976740
Email: kim.mawby@coventry.gov.uk

Enquiries should be directed to the above person.

<table>
<thead>
<tr>
<th>Contributor/approver name</th>
<th>Title</th>
<th>Directorate</th>
<th>Date doc sent out</th>
<th>Date response received or approved</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Contributors:</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Michelle Salmon</td>
<td>Governance Services Officer</td>
<td>Place</td>
<td>13/01/20</td>
<td>13/01/20</td>
</tr>
<tr>
<td><strong>Names of approvers for submission:</strong> (officers and members)</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Rachel Sugars</td>
<td>Finance Manager</td>
<td>Place</td>
<td>14/01/20</td>
<td>20/01/20</td>
</tr>
<tr>
<td>Julie Newman</td>
<td>Head of Legal Services</td>
<td>Place</td>
<td>14/01/20</td>
<td>17/01/20</td>
</tr>
<tr>
<td>Susanna Newing</td>
<td>Director of Human Resources</td>
<td>People</td>
<td>14/01/20</td>
<td>14/01/20</td>
</tr>
<tr>
<td>Gail Quinton</td>
<td>Deputy Chief Executive (People)</td>
<td>People</td>
<td>14/01/20</td>
<td>14/01/20</td>
</tr>
<tr>
<td>Kirston Nelson</td>
<td>Director of Education and Skills</td>
<td>People</td>
<td>13/01/20</td>
<td>14/01/20</td>
</tr>
<tr>
<td>Councillor K Maton</td>
<td>Cabinet Member for Education and Skills</td>
<td>-</td>
<td>14/01/20</td>
<td>27/01/20</td>
</tr>
</tbody>
</table>

This report is published on the council's website: www.coventry.gov.uk/councilmeetings
Executive Summary:

Under Section 14 of the Education Act 1996, Coventry City Council has a statutory duty to ensure sufficient school places and fair, appropriate access to education. It is the Council’s role to plan, commission and organise school places in a way that raises standards, manages supply and demand and creates a diverse infrastructure.

The Coventry One Strategic Plan, first presented to Council on 2nd October 2018, sets out pupil forecasts for special, primary and secondary pupils across education planning areas in response to rising or falling pupil cohorts across the city. It outlines the strategy proposed by the Local Authority and the Coventry Secondary Headteacher Partnership to meet the additional places required in secondary provision from 2019 – 2024. Work has also been undertaken to look at the Special School provision, primary estate in line with falling birth rates and how we will mitigate against these factors.

It is proposed that this strategy will be a flexible able to adapt to shifting mechanisms of parental preference, unforeseen changes in supply and demand of school places, and future birth rates. To do this, the One Strategic Plan will be monitored and updated annually with presentation to the Education Portfolio Councillor, and Cabinet, alongside a wider process of constant review of School Place Planning. In addition, the procuring of places will take place annually so as to not create an unstable number of school places.

A Memorandum of Understanding (MOU) has been established to ensure partnership commitment between the Council and secondary schools (and will be rolled out to primary and special, subject to approval). These partnerships signify a commitment and cooperation between the Council, governing bodies and school leadership teams to meet the educational needs of children and young people in Coventry, ensure the sustainability of Coventry schools, and to enable the City Council to meet its statutory obligations.

This partnership commitment signifies a statement of intent to collaborate and work in partnership to achieve the best possible outcomes for children and young people in Coventry.
The sustainability of Coventry schools, and to enable the City Council to meet its statutory obligations. As part of this process, numerous options have been discussed at both full partnership meetings, and the Secondary Headteacher Executive. The preferred option presented below has been approved by the partnership as being the best valid option keeping in line with our statutory requirement as outlined by the DfE to:

i. Spend capital funding efficiently
ii. Safeguard the quality of places in the system
iii. Manage down spare capacity in the estate where it exists.

Capital allocations to meet projected shortfalls in provision are provided by the Education Skills Funding Agency (ESFA) to all Local Authorities based on the data provided in the annual School Capacity return (SCAP). Demand for places minus the supply of places is multiplied by a cost per pupil place to inform the final allocation. This return informs the ESFA of the expected change in pupil numbers over the next few years, the current capacity of schools to meet those numbers and the planned changes to that capacity. There is currently a delay in the allocation to all councils for the capital allocations 21/22 likely to be announced later this year, within this report we therefore focus upon need up to 2022.

Recommendations:

The Cabinet is requested:

1. To authorise the programme of work outlined within the proposed Coventry One Strategic Plan for Primary, Secondary Education and Special Educational Needs (SEN), subject to the funding being secured.

2. To delegate authority to the Deputy Chief Executive (People) to agree the most appropriate procurement route for the works to be delivered and awarded.

List of Appendices included:

Appendix 1: One Strategic Plan 2019-2025
Appendix 2: Letter from Lord Agnew regarding Basic Need funding (Dated: 30/05/2018)
Appendix 3: Letter from Lord Agnew regarding Basic Need funding (Dated: 23/09/2019)
Appendix 4 A and B: School Organisation Regulations
Appendix 5: Alternative Options for Secondary Expansion

Background papers:

Coventry One Strategic Plan and Education Capital Programme
Cabinet Report – 2nd October 2018
http://democraticservices.coventry.gov.uk/ieListDocuments.aspx?CId=124&MId=11774&Ver=4

Has it been or will it be considered by Scrutiny?

No

Has it been or will it be considered by any other Council Committee, Advisory Panel or other body?

No

Will this report go to Council?

No
Title: Coventry One Strategic Plan and Education Capital Programme

1. **Context (or background)**

1.1. Under Section 14 of the Education Act 1996, Coventry City Council has a statutory duty to ensure sufficient school places and fair, appropriate access to education. It is the Council's role to plan, commission and organise school places in a way that raises standards, manages supply and demand and creates a diverse infrastructure.

1.2. The Coventry One Strategic Plan sets out pupil forecasts for primary and secondary across education planning areas in response to rising or falling pupil cohorts across the city. It outlines the strategy proposed by the Local Authority and the Coventry Secondary Headteacher Partnership to meet the additional places required in secondary provision from 2019 – 2024. Special Heads and Primary Partners across the City have also been involved in looking strategically at the need for additional special provision and falling numbers being seen at mainstream primary level.

1.3. **Primary**

1.3.1. The birth cohort is reducing, easing the previous pressure on primary places, although there are still localised areas of pressure within distinct planning areas of the city. There is a shifting movement of births within Coventry from the North East of the city, which has a falling birth rate, towards the West of the City where births are starting to stabilise and, in some areas, continuing to increase.¹

1.3.2. The birth cohort peaked for entry into Reception in September 2016 and, with the existing housing stock considered, has begun to re-stabilise and in some areas of the city started to decrease. Although future developments within the local plan may lead to a future rise in birth rates in the specified locations.

1.3.3. To utilise the existing school estate efficiently and enable schools to manage budgets more effectively; exploration of expanding the use of enhanced resourced provision (ERP) is being considered, which could lead to a range of ERP bases within the city to reflect the current priority areas of need including Autistic Spectrum Condition (ASC) and Social and Emotional Mental Health (SEMH).²

1.3.4. The current Year 3 (2018-19 Academic Year) is the largest cohort currently in Coventry Primary schools, September 2022 entry to Secondary, and will severely impact upon the availability of Year 7 places within the city.³

1.4. **Secondary**

1.4.1. Overall numbers in secondary schools will grow from September 2018 onwards as larger cohorts transfer from primary schools, the cohort leaving secondary school in that year is 3400 and the cohort entering being forecast is 3999 pupils. This will also impact upon the availability of In-Year placing as these cohorts start to reach the upper cohorts of secondary education.

1.4.2. From September 2019, additional capacity has been added in Secondary schools to mitigate these larger cohorts. It is proposed to adopt a model of both permanent and temporary expansions to ensure sufficiency of places, viability for schools, and cost-efficiency. Temporary expansions are for a single year of Year 7 increase, and that increase then moves through the school as that cohort reaches Year 11. Adopting a mixed economy model of permanent and temporary expansions will ensure the safeguarding of the future

---

¹ Appendix 1 – One Strategic plan - page 22.
² Enhanced Resource Provision is a model adopted by the majority of local authorities of providing small classbases (8-10 pupils) with an EHCP specialised teaching within a mainstream school.
³ Appendix 1 - One Strategic plan - page 39.
viability of the school estate, and longer term will allow for a more flexible approach to increasing and reducing capacity.

1.4.3. Phase One covering the years (2019-2021) was presented to Cabinet in October 2018 and outlines the planned temporary and permanent increases up to 2021, this has been updated to recognise site constraints and affordability.

1.4.4. To address the further forecast shortfall of places between 2022 and 2024, there has been a commitment between the Local Authority and the Coventry Secondary Headteachers that Phase Two expansions will be delivered internally within the existing school estate to provide the additional places. It is anticipated the capital allocation will mirror that given to the council last year which will be announced later this year. If this is not realised there is capacity to change the phase 2 options.

1.5. **Special Education Needs (SEN)**

1.5.1. Local Authorities have a statutory duty to ensure, that all learners who are subject to an Education, Health and Care Plan receive the provision they require to meet their assessed needs. This means that LAs have to provide a continuum of provision to meet a continuum of need. Whilst Coventry currently has relatively few specialist provisions delivered in the form of resourced centres/units in mainstream schools, it does have a good range of special school provision. Consequently, a small percentage of Coventry children have to attend schools outside of the City; we are continuing to assess these numbers.

1.5.2. However, the recent evidenced growth in need, specifically in the areas of complex communication (autism spectrum conditions) and social emotional and mental health (SEMH), has placed a level of demand on the special school system that exceeds supply. Whilst the recent expansion and relocation of Tiverton Special School has created much needed capacity in the primary sector, for children with generic learning difficulties, however there is no physical capacity in the system to support children with the following needs, however there is currently work being undertaken to address the Special Estate:

- SEMH growth across all age ranges (estimated at an additional 40 placements by 2024)
- Increased demand for secondary/post 16 special school placement for generic learning difficulties, as primary age pupils move through the system
- ASC growth across all age ranges (estimated at an additional 50 placements by 2024)

2. **Options considered and recommended proposal**

2.1. **Primary Schools options and recommended proposal**

2.1.1. With a declining birth rate and therefore a corresponding increasing primary school surplus, the Council still has a statutory duty to provide sufficient school places. To aid in a more measured and transparent manner for parents, it is proposed to examine PAN reductions in a coordinated cycle. This will ensure that not all surplus places are removed in the same academic year, and that information about the reduction in places is made apparent in admissions booklets. This proposed option will have the minimum impact upon parental preference whilst also ensuring that the majority of schools are able to maintain balanced budgets.

2.1.2. Education are working towards a sustainable level of surplus places in the city. There are local fluctuations in birth rates and migration rates which create challenges. It is our intention to ensure sufficient places whilst avoiding oversupply and without exceeding 5% surplus places within a planning area.

2.1.3. In certain areas of Coventry, DfE guidance would suggest that schools look at potentially temporarily decommissioning places to adjust supply to meet the future reductions in demand. Coventry Local Authority will look to facilitate those connections between head
teachers, governing bodies and school finance to examine where parties are in agreement over potential temporary reduction of PAN.

2.1.4. Headteachers have been encouraged to contact the Local Authority to discuss the Published Admission Number (PAN) of the school if they are concerned about the number of surplus places the school is likely to hold.

2.1.5. With this reduction there is a firm desire to continue to utilise existing buildings, and not allow them to decay in condition. Therefore, an ideal approach to the reduction in PAN will simultaneously exist with an increase in other forms of provision. This could include Early Years wraparound care, before and after school clubs, or Enhanced Resource Provisions (ERP) for pupils with Education Health Care (EHC) plans. The type of additional provision which can be offered, will be dependent upon the layout of the building, the wishes of the School leadership, and the suitability and range of existing provision in the area.

2.1.6. With the increases in SEND numbers outlined in the sufficiency strategy, an increase in the range of SEN provision would be of benefit to the city. The further development and review of ERPs, which could lead to a range of ERP bases across the primary phase that reflects the current priority areas of need including Autistic Spectrum Condition and Social Emotional, and Mental Health.

2.1.7. **Primary School Alternative Options**

2.1.8. If there were to be no decrease in a flexible approach to school planning with school’s decommissioning places for the planning horizon will lead to unsustainable levels of surplus in Coventry primary schools. This level of surplus may result in schools being financially unsustainable due to increased pressure on budgets.

2.2. **Secondary School options** and recommended proposal

2.2.1. On the 30th May 2018, all Local Authorities received a letter from Lord Agnew, the Parliamentary Under-Secretary of State for the School System, stating that the Education Skills Funding Agency (ESFA) ‘expect that, in doing so, Local Authorities will make every effort to spend capital funding efficiently, safeguard the quality of places in the system; and manage down spare capacity in the estate where it exists.’ One of the key points of the letter, was Local Authorities are

> ‘expected to create new places in schools or academies that have an overall Ofsted rating of ‘good’ or ‘outstanding,’ and to consider a range of performance indicators and financial data before deciding which school to expand. It is not expected that you expand a school or academy that is underperforming, unless there is a very strong rationale to do so.’

2.2.2. This criteria has underpinned the following recommended proposals.

2.2.3. **Recommended option - In September 2019**, an additional 8 forms of entry (240 year 7 places) are planned to use a mixture of temporary and permanent expansions within existing Coventry schools, in the area’s deficit places.

2.2.4. The temporary planned increases are outlined below:

<table>
<thead>
<tr>
<th>School</th>
<th>PAN Increase</th>
<th>Duration</th>
</tr>
</thead>
<tbody>
<tr>
<td>Caludon Castle</td>
<td>240 to 270</td>
<td>September 2019</td>
</tr>
<tr>
<td>Foxford</td>
<td>180 to 185</td>
<td>September 2019</td>
</tr>
<tr>
<td>Lyng Hall</td>
<td>150 to 180</td>
<td>September 2019</td>
</tr>
<tr>
<td>Sidney Stringer</td>
<td>210 to 240</td>
<td>September 2019</td>
</tr>
</tbody>
</table>

Other Options considered – as Appendix 5.
2.2.5. The permanent increases are outlined below:

<table>
<thead>
<tr>
<th>School</th>
<th>PAN Increase</th>
<th>Start Date</th>
</tr>
</thead>
<tbody>
<tr>
<td>Coundon Court</td>
<td>285 to 345</td>
<td>September 2019.</td>
</tr>
<tr>
<td>President Kennedy</td>
<td>270 to 300</td>
<td>September 2019.</td>
</tr>
<tr>
<td>Whitley</td>
<td>160 to 180</td>
<td>September 2019.</td>
</tr>
</tbody>
</table>

2.2.6. In **September 2020**, an additional 2 forms of entry (60 year 7 places) are planned to use a mixture of temporary and permanent expansions within existing Coventry schools.

2.2.7. The temporary planned increases are outlined below:

<table>
<thead>
<tr>
<th>School</th>
<th>PAN Increase</th>
<th>Start Date</th>
</tr>
</thead>
<tbody>
<tr>
<td>President Kennedy</td>
<td>300 to 330</td>
<td>September 2020 only.</td>
</tr>
</tbody>
</table>

2.2.8. The permanent planned increases are outlined below:

<table>
<thead>
<tr>
<th>School</th>
<th>PAN Increase</th>
<th>Start Date</th>
</tr>
</thead>
<tbody>
<tr>
<td>Barr’s Hill</td>
<td>131 to 161</td>
<td>September 2020.</td>
</tr>
</tbody>
</table>

2.2.9. In **September 2021**, an additional 6.5 forms of entry (199 year 7 places) are planned to use a mixture of temporary and permanent expansions within existing Coventry schools.

2.2.10. The temporary planned increases are outlined below:

<table>
<thead>
<tr>
<th>School</th>
<th>PAN Increase</th>
<th>Start Date</th>
</tr>
</thead>
<tbody>
<tr>
<td>West Coventry</td>
<td>237 to 297</td>
<td>September 2021 only.</td>
</tr>
<tr>
<td>Westwood</td>
<td>157 to 217</td>
<td>September 2021 only.</td>
</tr>
</tbody>
</table>

2.2.11. The planned permanent increases are outlined below:

<table>
<thead>
<tr>
<th>School</th>
<th>PAN Increase</th>
<th>Start Date</th>
</tr>
</thead>
<tbody>
<tr>
<td>Barr’s Hill</td>
<td>161 to 180</td>
<td>September 2021.</td>
</tr>
<tr>
<td>Ernesford Grange</td>
<td>180 to 210</td>
<td>September 2021.</td>
</tr>
<tr>
<td>Finham Park</td>
<td>240 to 270</td>
<td>September 2021.</td>
</tr>
</tbody>
</table>

2.2.12. Alternative options (Appendix 5) to this have been discussed in collaboration with the Secondary partnership, however these options have been discarded as they do not fulfil the criteria of providing good value for money, are not central to the areas of pressure, or cannot be completed to the correct scope due to site constraints.

2.3. **Special Education Needs Proposal**

2.3.1. Coventry City Council have been allocated funding to create new school places and improve existing facilities for children and young people with SEN and disabilities. The Special Provision Fund is currently available on the Coventry [Local Offer](#) page. This was a requirement of the funding being allocated as local authorities had to complete and publish a concise plan to show how they would invest their share of the fund on their local offer page.

2.3.2. It is proposed to share the funding across Broad Spectrum Special Schools, and specialist within mainstream Education. The Council have received £3.2million in Special Provision Fund, with a further £700,000 allocated to the Council but not yet received. It is proposed to allocate this £3.9 million funding towards a combination of increases at Secondary special schools and extending the offer of special provision across mainstream settings.

2.3.3. By looking at further Secondary expansion, given the areas of demand and primary need of the pupils, there appears to be up to 4 potential options or a combination of all 4 options for the allocation of this funding, in conjunction with other sources of funding.
- Demolition of the Old Tiverton school building will enable use of the land to accommodate two, double modular build provisions. One used for a purpose-built provision for pupils with higher needs and require their own space separate to the main school building. The second modular build with internal reorganisation within the school, will allow for an additional 24 pupils to be taken on role in September 2020.

- Expansion of Riverbank school – the school has not recently been expanded and so there may be potential for a modular build similar to Baginton on the school site.

- Expansion of resource bases in Mainstream Secondary to better facilitate pupils currently in a mainstream primary, who may be accommodated within mainstream Secondary by putting in Enhanced Resource Provisions (ERPs).

- Further expansion at Sherbourne fields school, Baginton, or the Corley Centre.

2.4. Finance

2.4.1. Basic need funding is allocated to Local Authorities to meet the demand for pupil places. Allocations have been made up until 2020/21. Future funding for the 21/22 financial year will be announced May/June 2020. These are indicative allocations, and the timescales for receiving the funds are likely to change.

<table>
<thead>
<tr>
<th>Secured Funding</th>
<th>£14,665,000</th>
</tr>
</thead>
<tbody>
<tr>
<td>19/20 Allocation</td>
<td>£3,913,000</td>
</tr>
<tr>
<td>20/21 Allocation</td>
<td>£6,237,000</td>
</tr>
<tr>
<td>Total Funding</td>
<td>£24,815,000</td>
</tr>
</tbody>
</table>

2.4.2. In March 2017, the Government committed £215 million of capital funding to help local authorities create new school places and improve existing facilities for children and young people with SEN and disabilities, in consultation with parents and providers. Coventry City Council secured £775,574 for three years, with a further top-up of £1,500,000 (total £3,950,018). The consultation for this Special Provision Fund is currently available on the Coventry Local Offer page, this consultation will determine the sites of the additional allocation. The Council has liaised closely with all special and mainstream schools via partnership meetings in order to inform a strategic plan.

2.4.3. Capital spend proposals outlined below:

<table>
<thead>
<tr>
<th>Detail</th>
<th>Resources</th>
<th>Expenditure</th>
</tr>
</thead>
<tbody>
<tr>
<td>Education Capital Basic Need up until 2021 (current and future)</td>
<td>£24,815,000</td>
<td></td>
</tr>
<tr>
<td>Current S106 for Education held by Council</td>
<td>£5,871,079</td>
<td></td>
</tr>
<tr>
<td>Education Capital Special Provision Fund (current and future)</td>
<td>£3,950,018</td>
<td></td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td><strong>£34,636,097</strong></td>
<td><strong>£-30,600,000</strong></td>
</tr>
<tr>
<td>Education Capital Programme – expanding secondary provision from basic need funds</td>
<td></td>
<td>(estimate)</td>
</tr>
<tr>
<td>Special Provision Capital Programme Grant (via Capital Special Provision Fund)</td>
<td></td>
<td>£-3,950,018</td>
</tr>
</tbody>
</table>

---

5 This allocation is likely to fund the majority of the phase 2 of Secondary expansions required at Secondary schools.

6 Please note potential future S106 income has been removed from the income table, as to comply with CIL compliance S106 can be only be spent at the specified school/project. Therefore, this funding will be dependant upon schools being named as part of the Programme for providing additional school places. However, it is likely that further S106 funding will be utilised in areas where expansion of schools is related to new housing developments.
2.4.4. The estimated breakdown cost of the Education Capital Programme between temporary and permanent expansions is as follows:

<table>
<thead>
<tr>
<th>Activity</th>
<th>Approximate Timing</th>
</tr>
</thead>
<tbody>
<tr>
<td>Consultation with Primary, Secondary and SEND Headteachers via Partnership meetings</td>
<td>June 2018 – November 2019</td>
</tr>
<tr>
<td>Secondary Partnership agreed proposals for secondary expansion, covering both phase 1 and phase 2.</td>
<td>September 2019 – March 2020</td>
</tr>
<tr>
<td>Report to Cabinet for adoption of the policy set out in the One Strategic Plan and recommendations</td>
<td>February 2020</td>
</tr>
</tbody>
</table>

3. Results of consultation undertaken

3.1.1. As academies, the schools included in the Secondary recommended option are required to consult for their expansion and inform the Department of Education of this consultation. The Council have consulted with Primary, Secondary, and SEN headteachers via Partnership meetings to co-produce this One Strategic Plan. For Primary, and SEN, depending upon whether the school is maintained or academy, the responsibility for conducting the consultation will either sit with Coventry or with the school.

4. Timetable for implementing this decision

The timescale for the One Strategic Plan is set out in the following table:

<table>
<thead>
<tr>
<th>Activity</th>
<th>Approximate Timing</th>
</tr>
</thead>
<tbody>
<tr>
<td>Consultation with Primary, Secondary and SEND Headteachers via Partnership meetings</td>
<td>June 2018 – November 2019</td>
</tr>
<tr>
<td>Secondary Partnership agreed proposals for secondary expansion, covering both phase 1 and phase 2.</td>
<td>September 2019 – March 2020</td>
</tr>
<tr>
<td>Report to Cabinet for adoption of the policy set out in the One Strategic Plan and recommendations</td>
<td>February 2020</td>
</tr>
</tbody>
</table>

5. Comments from the Director of Finance and Corporate Services

5.1. Financial implications

All financial implications are covered in sections 2.4 and 6.2 of the report.

5.2. Legal implications

Section 13 of the Education Act 1996 places the Local Authority under a duty to promote high standards and fair access to education. S14 of the Education Act 1996 sets out the Local Authority’s duty to secure sufficient schools in their area, and to consider the need to secure provision for children with SEN. This includes a duty to respond to parents’ representations about school provision.

The Local Authority has a wide discretion in exercising the s 14 duty but has to follow statutory processes when establishing, closing, or making alterations to a school as set out in the Education and Inspections Act 2006 and School Organisation (Prescribed Alterations to Maintained Schools (England) Regulations 2013. Failure to comply with statutory requirements would leave the Local Authority unable to make the proposed changes and subject to action by the DfE. Reduction to the published admission numbers(PAN) at maintained mainstream schools are not subject to compliance with the School Organisation (Prescribed Alterations to Maintained Schools (England) Regulations 2013, although admission authorities (the Local Authority) in the case of community and voluntary controlled schools, the governing body in the case of voluntary aided and foundations schools, and
the academy trust in the case of academy schools, must consult as required by School Admissions Code 2014 (SAC).

The SAC provides that when changes are proposed to admission arrangements, all admission authorities must consult on their admission arrangements (including any supplementary information form) that will apply for admission applications the following school year. Where the admission arrangements have not changed from the previous year there is no requirement to consult, subject to the requirement that admission authorities must consult on their admission arrangements at least once every 7 years, even if there have been no changes during that period. Community and Voluntary Controlled schools have the right to object to the Schools’ Adjudicator if the PAN proposed is lower than they would wish.

6. Other implications

6.1. How will this contribute to the Council Plan (www.coventry.gov.uk/councilplan/)

These proposals will support and synergise with the Council’s Policies as set out below:
- Making the most of our Assets – utilising existing estate to maximum potential and ensuring value for money.
- Improving Educational Outcomes – by providing additional school places in Good or Outstanding Schools.
- Raising the Profile of Coventry - by providing additional school places in Good or Outstanding schools.
- Creating the Infrastructure – Aiding in Schools to be self-sufficient.
- Rationalising our property portfolio – Enabling schools to reach their potential.

6.2. How is risk being managed?

Monitoring is carried out through a number of different processes. This project will be monitored through a project management team and will be subject to careful scrutiny and regular assessment on progress towards identified milestones. Further monitoring will be carried out through progress reports to the Cabinet Member (Education and Skills), Cabinet, and quarterly budgetary control monitoring.

Of the £26,118,225 identified in the Education Capital Basic Need, only £14,665,000 has been secured. The further resources of £3,913,000 and £6,237,000 whilst being allocated has not as yet been secured. However, the Council are not anticipating any reduction in its Basic Need Allocations.

<table>
<thead>
<tr>
<th>Secured Funding</th>
<th>£14,665,000</th>
</tr>
</thead>
<tbody>
<tr>
<td>19/20 Allocation</td>
<td>£3,913,000</td>
</tr>
<tr>
<td>20/21 Allocation</td>
<td>£6,237,000</td>
</tr>
<tr>
<td>Total Funding</td>
<td>£24,815,000</td>
</tr>
</tbody>
</table>

6.3. What is the impact on the organisation?

There are no specific impacts on the organisation.

6.4. Equalities and Consultation Analysis (ECA)

Children and young people with SEN often experience greater discrimination and have fewer opportunities than children without such difficulties. The proposal aims to ensure that all Coventry children have access to education in accordance with their needs. Any revised accommodation changes and admission arrangements take into account the provisions of the Equality Act 2010 in the context of their possible impact on equal opportunities.
Public authority decision makers are under a duty to have due regard to 1) the need to eliminate discrimination, 2) advance equality of opportunity between people who share a protected characteristic and those who do not 3) foster good relations between persons who share a relevant protected characteristic and people who do not (public sector equality duty - s 149(1) Equality Act 2010). The applicable protected characteristics are disability, gender reassignment; race, religion or belief, sex; sexual orientation, pregnancy or maternity.

Decision makers must be consciously thinking about these three aims as part of their decision making process with rigour and with an open mind. The duty is to have “due regard”, not to achieve a result but to have due regard to the need to achieve these goals. Consideration being given to the potential adverse impacts and the measures needed to minimise any discriminatory effects.

Each school has been assessed thoroughly in line with the Disability Discrimination Act 2004’ and meet the requirements of the Building Regulations and relevant British Standards including BS 8300 2009. Specific provisions of inclusion for wheelchair users; hard of hearing and visually impaired have been included in the designs. An access statement is provided for each school to act as an on-going live document. It documents the initial building approach and becomes an effective building management tool for the users to ensuring long term accessibility.

6.5. Implications for (or impact on) climate change and the environment

Coventry's schools currently account for 28% of the City's carbon footprint and this scheme will support the reduction of that level through replacing old school buildings with modern, energy efficient facilities. The Carbon Reduction Commitment (CRC) Energy Efficiency Scheme as amended is a mandatory carbon emissions tax covering non-energy intensive users in both public and private sectors, and is a central part of the UK’s strategy to deliver the emission reduction targets set in the Climate Change Act 2008. Emissions from schools (including PFI Schools) are to be included in the total reported carbon emissions for their participating Local Authority. The new school building would also be designed to mitigate the effects of climate change fluctuations and to help reduce surface water run off as a result of flash or extreme weather events, reducing any negative effects on the local community and environmental infrastructure.

6.6. Implications for partner organisations?

Planning for additional SEN places will require close partnership with the PCT, Clinical Commissioning Groups, Coventry and Warwickshire Partnership Trust, Social Care and Private/Voluntary Organisations and will enable multi-agency support and provision for children with SEN to be made.
Report author(s):

Name and job title:
Kirston Nelson, Director of Education and Skills
Sarah Mills, Head of Service Education Entitlement

Directorate:
People

Tel and email contact:
Tel: 02476 832785
Email: sarah.mills@coventry.gov.uk

Enquiries should be directed to the above person.

<table>
<thead>
<tr>
<th>Contributor/approver name</th>
<th>Title</th>
<th>Directorate or organisation</th>
<th>Date doc sent out</th>
<th>Date response received or approved</th>
</tr>
</thead>
<tbody>
<tr>
<td>Adrian Coles</td>
<td>Programme Delivery Manager – Education and Skills</td>
<td>People</td>
<td>25/10/2019</td>
<td>30/10/2019</td>
</tr>
<tr>
<td>Elaine Atkins</td>
<td>Lawyer - Finance and Corporate Services</td>
<td>People</td>
<td>25/10/2019</td>
<td>28/10/2019</td>
</tr>
<tr>
<td>Lara Knight</td>
<td>Governance Services Co-ordinator</td>
<td>Place</td>
<td>29/01/2020</td>
<td>29/01/2020</td>
</tr>
<tr>
<td>Sarah Mills</td>
<td>Head of Service Education Entitlement</td>
<td>People</td>
<td>24/01/2020</td>
<td>27/01/2020</td>
</tr>
<tr>
<td>Helen Williamson</td>
<td>Lead Accountant Capital and Grants Team</td>
<td>Place</td>
<td>24/01/2020</td>
<td>27/01/2020</td>
</tr>
</tbody>
</table>

Names of approvers for submission: (Officers and Members)

<table>
<thead>
<tr>
<th>Contributor/approver name</th>
<th>Title</th>
<th>Directorate or organisation</th>
<th>Date doc sent out</th>
<th>Date response received or approved</th>
</tr>
</thead>
<tbody>
<tr>
<td>Rachel Sugars</td>
<td>Finance Manager - Resources Finance</td>
<td>Place</td>
<td>24/01/2020</td>
<td>27/01/2020</td>
</tr>
<tr>
<td>Julie Newman</td>
<td>Head of Legal Services</td>
<td>Place</td>
<td>27/01/2020</td>
<td>29/01/2020</td>
</tr>
<tr>
<td>Kirston Nelson</td>
<td>Director of Education and Skills</td>
<td>People</td>
<td>24/01/2020</td>
<td>29/01/2020</td>
</tr>
<tr>
<td>Councillor K Maton</td>
<td>Cabinet Member for Education and Skills</td>
<td>-</td>
<td>29/01/2020</td>
<td>29/01/2020</td>
</tr>
<tr>
<td>Gail Quinton</td>
<td>Deputy Chief Executive</td>
<td>People</td>
<td>27/01/2020</td>
<td>29/01/2020</td>
</tr>
</tbody>
</table>

This report is published on the council's website: www.coventry.gov.uk/councilmeetings
Contents

1.0 Introduction .................................................................................................................3
1.1. Coventry’s Education and Learning Vision ...........................................................3
1.2. Statutory Context ......................................................................................................3
1.3. Coordinated Strategic approach ............................................................................4
2 Key strategic priorities .................................................................................................6
3 Maintaining Available Capacity .................................................................................7
3.1 School Admissions ..................................................................................................8
3.2 Home to School transport .......................................................................................8
4 Funding ..........................................................................................................................9
5 Housing Developments ..............................................................................................11
6 Providing School Places ............................................................................................13
6.1 School expansions ..................................................................................................13
6.1.1 Partnership working .........................................................................................14
6.1.2 Size .................................................................................................................14
6.2 New schools .............................................................................................................14
7.0 Coventry Context .....................................................................................................15
7.1. Characteristics of Coventry provision for children .............................................15
7.1.1 Academisation ....................................................................................................15
7.2 Special Schools .......................................................................................................15
7.3 Population Context ................................................................................................16
7.4 EHCP’s (Education Health and Care Plans) .........................................................17
7.5 Early Years ..............................................................................................................18
7.6 Primary Context .....................................................................................................21
8 Future Need ...................................................................................................................22
8.1 Primary ......................................................................................................................22
8.2 Secondary ................................................................................................................24
8.3 SEND Provision .......................................................................................................27
8.4 Proposed Strategic SEN Plan ................................................................................36
8.4.1 SEND (Phase 1) .................................................................................................36
8.4.2 SEND (Phase 2) – 2019 ....................................................................................37
8.4.3 SEND (Phase 3) 2020 onwards .........................................................................37
9. Post 16 ..........................................................................................................................39
10. Alternative Provision (AP) .....................................................................................41
Appendices .......................................................................................................................42
1.0 Introduction

1.1 Coventry’s Education and Learning Vision

Coventry’s Children and Young People 2018 plan sets out the outcomes which organisations in Coventry will work together to deliver so they can provide the best support possible for children, young people and their families.

There are four key priorities within the plan:
- Early help
- Be healthy
- Stay safe
- Education, training and employment

In this context, the One Strategic Plan will help schools, parents, council staff, local partners and stakeholders understand how Coventry City Council plans to provide school places to ensure that all children and young people thrive in Coventry schools and settings throughout their education, wherever they live.

This document sets out the principles underpinning school place planning; the ways in which places will be delivered, the information used to inform this delivery, and the way work is conducted to deliver high quality, accessible school places for all learners.

1.2 Statutory Context

Coventry City Council (CCC) has a legal duty under Section 14 of the Education Act 1996, to ensure sufficient school places and fair, appropriate access to education. It is the Council’s role to plan, commission and organise school places in a way that raises
standards, manages supply and demand and creates a diverse infrastructure. This enables the Council to:

- ensure sufficient schools and places in a locality;
- secure sufficient early years & childcare places;
- ensure sufficient post 16 provision;
- provide appropriate education provision for children with special educational needs and disabilities;
- promote high education standards;
- ensure fair access to educational opportunity;
- promote the fulfilment of every child’s education potential;
- promote diversity and parental choice.

With the Council being statutorily responsible for commissioning school places in all schools, including Academies and Free Schools, these are considered equally in the City Council’s planning of school places.

This strategy provides, for the longest possible planning horizon, until September 2023 for Primary and September 2025 for Secondary, to ensure that need is anticipated and met in a transparent, objective, cost effective and sustainable way. The purpose behind the One Strategic Plan was to provide political leadership for an annual review and audit of the school places being delivered.

1.3. Coordinated Strategic approach

A memorandum of understanding (MOU) has been established in order to ensure partnership commitment between the City Council and Coventry Secondary Schools which will support the strategic plan for the delivery of additional school places 2018/19 to 2024/2025. This approach will be rolled out to primary and special to mitigate or meet demand through a partnership strategy.

This partnership commitment signifies a statement of intent to collaborate and work in partnership to achieve the best possible outcomes for children and young people in Coventry, ensure the sustainability of Coventry schools, and to enable the City Council to meet its statutory obligations.

The MOU has established a partnership commitment concerning the below principles:

1. The Council and all Coventry schools have a shared interest in ensuring all pupils have access to good quality local provision.
2. School organisation issues rarely affect schools in isolation; therefore, strong LA/school partnerships are important to understanding the impact of school organisation decisions.
3. A partnership approach is therefore required to create the strategic plan based on a set of agreed partnership principles:

- Collective moral purpose & accountability;
- Openness & transparency;
- Expansion & investment of existing schools where possible and relevant – against agreed criteria – as set out in point 4.
- Working with current partners; and
- Never knowingly undermining another school.

These principles will underpin the way we work together and how we create the plan.

4. A basic requirement of this strategy is that it ensures the right number of school places to meet pupil’s needs, in the right locations, at the time they are needed. Commissioning additional school places at existing schools will therefore be assessed against the following criteria:

- Net Capacity. We will wherever possible seek to expand schools in whole forms of entry;
- Current performance of school – LA or Ofsted categorisation. Guidance on school organisation is clear that outcomes should lead to school improvement and increased attainment levels;
- The location of the school relative to the expected pupil need. It is desirable for schools to be at the heart of the community that they serve in order to provide easy access to their facilities by children, young people and their families, and the resident community;
- Current size of school – maximum 10 forms of entry and minimum 7 forms of entry where possible;
- Popularity of the school. We will seek to commission additional places, when needed, at schools with high levels of parental preference in the locality, looking closely at first choices and those schools that are oversubscribed;
- Physical ability of school to expand including any site or potential planning constraints;
- Cost of expansion. It will be important to ensure that any proposals represent good value for money and are in keeping with available capital funds. All school buildings and estates in the City should be of the highest quality within the resources available;
- Diversity of provision. Coventry has a broad variety of provision, with both voluntary-aided, trust schools, in addition to a large number of academies of various types. The LA seeks to maintain or increase levels of diversity and choice for parents wherever possible. In considering school planning, the aim will be to maintain the balance of denominational provision, unless parental preferences via the admissions process provide evidence that change is required. In considering places at voluntary aided schools the LA has a strong relationship
with the appropriate Diocesan and Church Authorities, and we regard this partnership working as implicit to good planning;

- SEN/ Inclusion. Wherever possible any school changes should seek to promote greater inclusion for those pupils having SEN and/or disabilities, by providing specialist provision within /linked to mainstream schools or academies. The benefits of this approach are that it; maximises the opportunity for children and young people to be included within their local community, minimises journey times to and from school and makes the optimal use of the revenue funding available to support such individuals or groups.

- Governing Body/ Trustees support. Proposals will normally require careful negotiation with schools and their governors to align aspirations for development. Where proposals are subject to statutory notice processes we will ensure that all prescribed consultees have the opportunity to have their say before any decisions are taken by the LA.

It is therefore intended to develop through this agreement, a spirit of co-operation between the Council, governing bodies and school leadership teams that will help all parties to achieve a fair and open way forward to meet the education needs of local families and their children.

2 Key strategic priorities

Where possible, we will consult with all schools and decide upon the most cost-effective way forward.

We are committed to ensuring all schools are kept informed with regards to long term school planning. We will, where possible, design buildings which enable schools to be flexible in the longer-term regarding use of buildings and grounds.

Each year we will communicate to all schools our proposals for new schools, expansions and the long-term demand by area. Schools will be invited to comment and declare an interest in expansion.

We are committed, where expansions and funds allow, to address the following areas

- Local places for local children
  We are committed to providing school places for children in their local community whenever possible.

- Removal of half forms of entry by increasing or decreasing (where appropriate) schools PAN
  In order to provide schools with stability when organising classes, we will look to remove half forms of entry, where possible. A number of schools in the City are operating with half
forms of entry (e.g. admit 45 or other multiples of 15) this often requires the school to organise into mixed age classes in order to provide financial viability towards covering the cost of a full time teacher. Whilst it is possible to operate in this manner, it is more challenging for teachers and can be unpopular with parents. The local authority will look to remove half forms of entry where possible, particularly through expansion programmes.

- **Increase 1 form of entry (FE) to 2 forms of entry (FE)**
  When expansion is required, if possible and appropriate we will look to expand schools to 2 (FE) to provide better financial stability.

- **Incorporate SEND facilities within mainstream schools**
  To make best use of education facilities and increase inclusion for pupils with Special Educational Needs and Disabilities, we are developing schemes to include SEND facilities within mainstream schools and expand capacity.

- **Address safeguarding issues relating to buildings and grounds**
  We are committed to addressing any safeguarding within schools relating to the school building or grounds and will address any issues identified in a timely manner to ensure the safety of children in Coventry schools.

- **Address buildings defects and Equality Act noncompliance**
  Where funds allow, we will address any identified defects. All school buildings in Coventry should be accessible to all and up to an equal standard.

### 3 Maintaining Available Capacity

Education planning areas are used by the LA to assess the supply and demand of school places. The areas are proposed by the LA and agreed by the Education Skills Funding Agency (ESFA). Any changes to planning areas must be agreed through this process. Coventry City Council applied to change its planning areas in February 2018, these were accepted and approved in April 2018. Please see attached appendices 1-4 which detail the planning area boundaries and in which planning areas schools are sited. Whilst Education use these areas to plan, there is recognition that the boundaries are not rigid and there is significant movement across these boundaries as parental preference and flexibility changes each year.

There is a need to maintain a certain amount of capacity within a given area to allow for flexibility to meet parental preference as much as possible, enable in-year transfers and allow families moving to an area to be able to secure a place at a local school or for each of their children at the same school.¹

¹ The School Admissions (Infant Class Sizes) (England) Regulations 2012, Section 4.—(1) states that 'No infant (Year Reception, Year 1, and Year 2) class may contain more than 30 pupils while an ordinary teaching session is conducted by a single school teacher.'
The DfE previously recommended that Local Authorities should retain between 4% and 8% capacity per planning areas as surplus to accommodate ‘In Year’ applications/growth. This guidance lapsed in 2014, and now the DfE recommend that LA should monitor its own capacity to reasonable levels. Within Coventry LA this figure is determined as 3% for Secondary and 4% for Primary.

This is due to high levels of In-Year variance the city is experiencing. For the most part this 3-4% capacity will be measured within a planning area. However, Education recognise that where there are planning areas with a low Published Admission Number (PAN) or oversubscribed schools, 4% capacity may be unattainable or lead to issues with financial viability in the school. It is also noted that due to the size and nature of the City, particularly in relation to secondary pupils where freedom of movement is more accessible, if a planning area is consistently oversubscribed it is unlikely to be able to maintain this level of surplus capacity. Similarly, if a planning area contains less popular schools, the surplus margin may be much larger. Therefore the 4% surplus will also be monitored as a city-wide aggregate.

This policy has been factored in the planning and analysis set out further on in this strategy. Current and forecast capacity and how it aligns to the maintaining capacity policy is available within Appendix 3 (primary) and Appendix 4 (secondary).

3.1 School Admissions

All aspects of school admissions are based on the School Admissions Code. It governs the way all schools set their admissions oversubscription criteria, ensures compliance with local co-ordinated schemes, makes offers of places and allows for school admissions appeals. It also places the local authority as a regulator for all other admission authorities within its boundaries, with the expectation that the local authority will report those admission authorities whose admission arrangements are not in line with the School Admissions Code to the school’s adjudicator.

The School Admissions Code places a requirement on all local authorities to publish a ‘co-ordinated scheme’ and manage the admissions process. This booklet is published and made available to all parents, via the Council website, and sets out how to apply for a school place for

- Primary (Year R)
- Junior (Year 3)
- Secondary (Year 7)
- University Technical Colleges (Year 10)

For all children, the authority will try to offer a place at the school listed first. Parents are advised to read the admissions policies of all the schools requested so they can judge the
likelihood, or not, of being offered a place at the school they most prefer. When a school receives more applications than it has places available, we need a fair and consistent way of deciding how to offer the places available.

3.2 Home to School transport

Coventry City Council provides home to school transport to pupils in accordance with national legislation. In instances where a place at a school named as a parental preference, cannot be offered to a pupil and the alternative place offered is above the distance criteria set out below (or use of a walking route that is deemed ‘unsafe’ is required), CCC will provide transport to the alternative school.

Pupils up until the age of eight: 2 miles
Pupils aged eight and over: 3 miles

Please click here for more information on Home to School Transport

4 Funding

The provision of additional school places usually requires Capital investment into the school. There are currently several avenues for funding additional school places. This is usually provided as a grant through the DfE or by requesting contributions from new developments. The following section examines the different sources through which funding can be claimed.

- Basic Need Grant funding

Capital allocations to meet projected shortfalls in provision are provided by the Education Skills Funding Agency (ESFA) to all local authorities based on the data provided in the annual School Capacity return (SCAP). This funding is required to help fulfil the Local Authorities duty to make sure there are enough school places for children in their local area. The level of funding is determined by the demand for school places in the city. This return informs the ESFA of the expected change in pupil numbers over the next few years, the current capacity of schools to meet those numbers and the planned changes to that capacity. There is pressure on capital budgets for new school places across the country and it is likely that allocations will continue to be limited for the foreseeable future. It is important, therefore, to consider value for money in the process of commissioning school places.

---

2 The forecast pupil numbers methodology for the SCAP return can be found in Appendix 7.
<table>
<thead>
<tr>
<th></th>
<th>Amount</th>
</tr>
</thead>
<tbody>
<tr>
<td>Secured Funding</td>
<td>£14,665,000</td>
</tr>
<tr>
<td>19/20 Allocation</td>
<td>£3,913,000</td>
</tr>
<tr>
<td>20/21 Allocation</td>
<td>£6,237,000</td>
</tr>
<tr>
<td><strong>Total Funding</strong></td>
<td><strong>£24,815,000</strong></td>
</tr>
</tbody>
</table>

The Chancellor, in October 2019, confirmed details of the Spending Round. The Spending Round focused on day-to-day departmental resource budgets for 2020-21 (as well as a 3-year settlement for core schools' resource funding as an exception). It did not consider departmental capital budgets, as these have already been set for 2020-21. A full multi-year spending review will follow in 2020. One practical consequence for local authorities is that the DfE are not able to announce Basic Need allocations for places needed in 2021 onwards. This uncertainty will have implications for the way that local authorities plan and deliver basic need projects. ³

- **Section 106 (S106) funding / Community Infrastructure Levy (CIL) funding**

The SCAP return asks local authorities to provide forecasts of pupil numbers that exclude pupils brought to the area by new housing development: there is an expectation that provision for these pupils will be funded through contributions provided by the developers. The ESFA expect the infrastructure required as a result of housing developments to be mitigated by S106 funding/ CIL funding.

The Local Authority will seek to access funding from developers towards providing additional education provision, through the expansion of existing schools or the opening of new schools, when the predicted impact of a new housing development creates a shortfall.

Where new housing development creates a demand for school places in excess of those available, the LA will work with developers to ensure that the appropriate contributions for the provision of additional school places are given. Where a housing development yields a large amount of pupils and justifies new provision, it may be necessary to secure land. The land would be used for education purposes, to safeguard the LA’s statutory responsibility to provide sufficient school places.

This will continue to be achieved through Section 106 agreements. Education will seek the maximum contribution from developers to support the provision of additional places that we believe is proportionate to the impact of the development. It is critical that developers make a financial contribution to school places as, without it, the LA will be unable to deliver the required provision. Section 106 also includes asking for Primary and Secondary SEN contributions to aid in commissioning additional special school places as a result of the development. ⁴

---

³ All full copy of the letter received from Lord Agnew can be found Appendix documents
⁴ The methodology for the pupil yield calculation is included in appendix 2.
Given the housing trajectory provided by the Local Plan as to how many dwellings the Council plans to deliver the maximum contribution\(^5\) that will be requested is as follows.

<table>
<thead>
<tr>
<th>Funding Received in Financial Year beginning</th>
<th>Total Primary Contribution</th>
<th>Total Secondary Contribution</th>
<th>Total SEN Contribution</th>
</tr>
</thead>
<tbody>
<tr>
<td>Apr-19</td>
<td>£879,314</td>
<td>£680,739</td>
<td>£58,336</td>
</tr>
<tr>
<td>Apr-20</td>
<td>£2,332,623</td>
<td>£1,805,849</td>
<td>£154,752</td>
</tr>
<tr>
<td>Apr-21</td>
<td>£3,871,422</td>
<td>£2,997,142</td>
<td>£256,840</td>
</tr>
<tr>
<td>Apr-22</td>
<td>£6,869,637</td>
<td>£5,318,272</td>
<td>£455,749</td>
</tr>
<tr>
<td>Apr-23</td>
<td>£5,929,260</td>
<td>£4,590,260</td>
<td>£393,362</td>
</tr>
<tr>
<td>Apr-24</td>
<td>£5,410,221</td>
<td>£4,188,435</td>
<td>£358,927</td>
</tr>
<tr>
<td>Apr-25</td>
<td>£5,703,325</td>
<td>£4,415,348</td>
<td>£378,373</td>
</tr>
<tr>
<td>Apr-26</td>
<td>£5,147,648</td>
<td>£3,985,159</td>
<td>£341,508</td>
</tr>
<tr>
<td>Apr-27</td>
<td>£5,685,006</td>
<td>£4,401,166</td>
<td>£377,157</td>
</tr>
<tr>
<td>Apr-28</td>
<td>£5,343,051</td>
<td>£4,136,434</td>
<td>£354,471</td>
</tr>
<tr>
<td>Apr-29</td>
<td>£5,343,051</td>
<td>£4,136,434</td>
<td>£354,471</td>
</tr>
<tr>
<td>Apr-30</td>
<td>£5,251,456</td>
<td>£4,065,524</td>
<td>£348,395</td>
</tr>
</tbody>
</table>

- Centrally funded new schools via the Government’s Free School programme.
- Capital Receipts – the sale of former education settings deemed surplus to requirements can be ring fenced to education, in exceptional circumstances.
- Capital contributions from individual school budgets and/or bids by Academies for ‘Capital Infrastructure Funding’ (CIF).
- Capital funding allocations for ‘Voluntary Aided’ schools (LCVAP funding).
- Special Provision Fund

The Special Provision fund allocations are designed to create new places and improve facilities at existing schools. This funding is primarily intended to develop provision for pupils with more complex special educational needs (i.e. an EHC plan or a statement of special educational needs) in mainstream and/or special schools.

\(^5\) Please note where requests cannot be justified or will not be Community Infrastructure Levy (CIL) compliant, the funds received may be lower than outlined in this table.
5 Housing Developments

The Coventry Local Plan 2011-2031 has followed a period of public examination and consultation on proposed modifications. The Inspector has now published the reports covering the Local Plan and City Centre Area Action Plan. These have been approved and the Council ratified the plan on the 5th of December 2017.

The Local Plan calls for significant development in the North and West of the city, with a total of 24,600 additional homes built across the city by 2031, the end of the plan period. With a further 17,800 homes being built on Warwickshire land based on an agreed redistribution mechanism with the various districts and boroughs. From 2017 onwards Coventry City Council plans to build 1,300 homes per annum within the city of which 600 per annum homes are to be classed as affordable.

New housing developments can create additional demand for existing and new education facilities. This new housing is estimated to lead to over 13,200 additional children across all age ranges. There are also significant numbers of housing developments receiving planning permission outside the local plan process, which are already beginning to impact on local schools. Coventry do not ask for developer contributions on one-bedroom dwellings, as they are unlikely to generate either primary, secondary or sixth form pupils. For this reason, Coventry calculate pupil yield from development which is designed for familial occupation, I.E. 2 bed dwellings and above.

From September 2019, the pupil yield figures for Coventry are follows:

<table>
<thead>
<tr>
<th></th>
<th>Primary</th>
<th>Secondary</th>
<th>Sixth Form</th>
<th>Primary SEND</th>
<th>Secondary SEND</th>
<th>Early Years</th>
</tr>
</thead>
<tbody>
<tr>
<td>Pupils generated per 1 eligible dwelling</td>
<td>0.39</td>
<td>0.23</td>
<td>0.04</td>
<td>0.01</td>
<td>0.01</td>
<td>0.08</td>
</tr>
<tr>
<td>Pupils generated per 100 eligible dwelling</td>
<td>40</td>
<td>24</td>
<td>4</td>
<td>1</td>
<td>1</td>
<td>8</td>
</tr>
</tbody>
</table>

The pupil yield methodology for how these figures have been calculated is included in appendix 2.6

The current rate of housebuilding in Coventry is likely to generate additional school age pupils. In the north of the city, there are 4000 total homes allocated. The majority of these are part of the Keresley SUE, on this site is provision and land for a new 2FE primary school which will cater for the long-term impact of this development with other local primary schools taking any additional pupils, through school expansions, who will arise from this development.

---

6 These figures have been rounded to two decimal places.
In the west of the city, Coventry City Council have managed to secure a parcel of land for Education within this section of the city. This is part of the Eastern Green development in the local plan, which is scheduled to commence building works in 2021. The masterplan for this site contains land for a 3FE primary school.

In the south of the city, the Kings Hill development in Warwickshire, c. 4000 dwellings, with c.1800 dwellings being delivered by 2030. The development is currently scheduled to begin in 2021, this site currently has plans for primary school(s), and a Secondary education site. It is expected the development of the secondary school will not begin until c.2025 at the earliest. Whilst pupils arising from this development will be under Warwickshire’s authority, they are likely to look at Coventry for school places, particularly whilst the education provision on site is being developed.

In the east of the city, there is significant regeneration, the redevelopment of Bell Green and Potter’s Green is nearing completion. Regeneration of housing is difficult to factor into pupil yield as it essentially a replacement of stock housing, however the mix of housing does bring changes to the demographic and increasing pupil numbers. The largest housing development in this part of the city is the Walsgrave development, near the hospital.

6 Providing School Places
There are two consistent methods for providing additional school places, through either school expansions or providing new schools.

6.1 School expansions
Where a predicted shortfall of places has been identified, the most common solution is to expand an existing school. We will consult with all schools in the area and decide upon the most cost-effective way forward after considering expansion opportunities available within various school sites and costs.

There are several factors taken into consideration as set out below:

<table>
<thead>
<tr>
<th>Criteria</th>
<th>How is this Measured</th>
<th>Source</th>
</tr>
</thead>
<tbody>
<tr>
<td>Access – Serving Area of Need</td>
<td>Pupil number forecasts.</td>
<td>Data Team / Education &amp; Learning</td>
</tr>
<tr>
<td>Locality of schools in relation to demand.</td>
<td></td>
<td>Education &amp; Learning</td>
</tr>
<tr>
<td>Long term planning applications in the adjoining area.</td>
<td>Planning Team / Education &amp; Learning</td>
<td></td>
</tr>
<tr>
<td>Proposed admission arrangements.</td>
<td></td>
<td>Education &amp; Learning</td>
</tr>
<tr>
<td>Suitability of site and Net capacity of schools.</td>
<td></td>
<td>Property Information Team/Academies</td>
</tr>
</tbody>
</table>
6.1.1 Partnership working
There is an expectation that small schools or schools with known budget pressures will work in partnership or collaborate with suitable partner schools whenever possible, to achieve economies of scale, for example: through federation and shared staffing/resources. This may help to maintain financial viability and remain sustainable longer term.

6.1.2 Size
The minimum size for a primary school will vary across local authority borders; however, it is an important consideration when looking to ensure the long-term viability of Coventry City Schools. When looking at expanding primary school provision, the local authority will look to expand primary schools from 1FE to 2FE where there is demand for places, to help with the financial viability of those schools. Where new schools are required, the preferred model will be for 2FE primaries, although specific context may require smaller or larger schools to be provided.

---

7 See 2.9.2 for further explanation.
8 See 2.9.1 for further explanation.
6.2 New schools
The need for new schools often arises when there are no opportunities to expand existing local schools or where new housing developments are expected to bring large numbers of new families to an area, where no existing provision can accommodate the influx of people.

When the need to establish a new school arises, there is a presumption in law that these schools will be Free Schools. The role of the local authority is to identify a site for the school and to seek applications to run the new school from potential sponsors. The final decision on who should sponsor a new school is taken by the Regional Schools Commissioner (RSC), whilst the RSC now has a requirement to consult with the LA on any new free school proposal, the overall decision is outside of local authority control.

It is the responsibility of the local authority to seek sponsors for these new schools, therefore if a new school is required, the local authority would look to engage with potential suitable organisations including existing high-quality providers within Coventry. The council intends to work collaboratively with the ESFA and office of the Regional Schools Commissioner and other external providers if new school(s) are required.

In order to provide sufficient Early Years places across Coventry, where existing provision is at capacity, all new build schools will include facilities for Early Years provision, and SEN provision. For Secondary, similar inclusion facilities will be provided.
7.0 Coventry Context

7.1 Characteristics of Coventry provision for children

7.1.1 Academisation

There are currently 86 primary schools in Coventry. This includes the Primary phase of the Seva School. The academy conversion process which was initially popular with Secondary Schools is now starting to spread to Primary schools as Multi-Academy Trusts expand and encompass more schools across wider areas. These are broken down as follows.⁹

<table>
<thead>
<tr>
<th>School Type</th>
<th>In process</th>
<th>Maintained</th>
<th>Free Schools</th>
<th>Voluntary Controlled Schools</th>
<th>Voluntary Aided Schools</th>
<th>Academies</th>
<th>Total (all schools of type in county)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Primary (inc. Inf, Jun, Pri)</td>
<td>1</td>
<td>46</td>
<td>1</td>
<td>2</td>
<td>6</td>
<td>29</td>
<td>85</td>
</tr>
<tr>
<td>Secondary</td>
<td>0</td>
<td>0</td>
<td>3</td>
<td>0</td>
<td>0</td>
<td>18</td>
<td>21</td>
</tr>
<tr>
<td>Special (all types)</td>
<td>0</td>
<td>7</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>2</td>
<td>9</td>
</tr>
<tr>
<td>All-through</td>
<td>0</td>
<td>0</td>
<td>1</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>1</td>
</tr>
</tbody>
</table>

7.2 Special Schools

Coventry maintains six special schools and commissions places at two special academies within the local area, offering the following provision:

<table>
<thead>
<tr>
<th>School</th>
<th>Type of Need</th>
<th>Age Range</th>
</tr>
</thead>
<tbody>
<tr>
<td>Castlewood</td>
<td>*generic learning difficulties</td>
<td>Primary: 4 to 11</td>
</tr>
<tr>
<td>Three Spires Academy</td>
<td>general learning difficulties and autism</td>
<td>Primary: 4 to 11</td>
</tr>
<tr>
<td>Tiverton</td>
<td>*generic learning difficulties</td>
<td>Primary: 4 to 11</td>
</tr>
<tr>
<td>Sherbourne</td>
<td>*generic learning difficulties</td>
<td>All age: 4 to 19</td>
</tr>
<tr>
<td>Baginton</td>
<td>*generic learning difficulties</td>
<td>Secondary: 11 to 19</td>
</tr>
</tbody>
</table>
7.3 Population Context

The 2016 Mid-Year estimates 353,000 people live within the City boundaries. (2016 Mid-Year ONS estimates) This number is only expected to continue to increase, due to the young demographic of the city, 20% of the city’s population are aged 20-30 and higher levels on inwards migration.

However, the birth cohort is starting to stabilise to more regular levels, this means the pressure on primary places is starting to ease, although there are still localised areas of pressure within distinct planning areas of the city. The transient nature of a city’s population and the social mobility of its residents mean that births, and GP registration data will be updated quarterly from the NHS trust, so that Coventry City Council can more effectively track pre-school cohorts and how they move around the city. This social mobility, and any unprecedented migration to areas of the city may lead to increased localised pressure which will require monitoring to ensure that additional school places are not immediately planned for when it is known that the pressure will dissipate as the families migrate again.
The latest data from the health authorities gives us some key headlines:

- The birth cohort peaked for entry into Reception in September 2016 and, with the existing housing stock considered, has begun to re-stabilise and in some areas of the city started to decrease. Although future developments within the local plan may lead to a future rise in birth rates in the specified locations.
- The current Year 3 is the largest cohort currently in Coventry Primary schools, September 2023 entry to Secondary, and will severely impact upon the availability of places within the city.

7.4 EHCP’s (Education Health and Care Plans)

In January 2019, Coventry maintained 2,084 Education Health and Care Plans (EHC Plans) compared to 1280 in 2014, a growth of 804 or 63% in 6 years. Overall 2.3 % of Coventry’s school age population have an EHC Plan, which remains lower than Coventry’s statistical neighbours (2.7%) and the all England average (2.8%).

The growth is attributable to both the number of new first-time assessments, resulting in an EHC Plan, which has risen by 25% in the last three years and the number of young people remaining in Further Education with an EHCP. Before 2014, a Statement of Special Educational Needs would cease at the point a student moved from a school to a college. However, in September 2014 legislation changed, which meant LAs took over responsibility for maintaining EHC Plans in colleges until a pupil is aged 25. Approximately 27% of the EHC Plans maintained are for students aged 16 to 25.
7.5 Early Years

Coventry Local Authority carries out a Childcare Sufficiency Assessment in line with its statutory duties under the Childcare Act 2006 and 2016. The assessment is a measurement of the nature and extent of the need for, and supply of childcare in each ward in Coventry. The purpose of the assessment is to help identify where there are current gaps in the childcare market and propose recommendations. Section 6 of the 2006 Act gave Local Authorities a new duty of securing, so far as is “reasonably practicable”, that the provision of local childcare is sufficient to meet the requirements of parents and carers to enable them to work or undertake education or training leading to employment.

Early years’ education and childcare is provided in Coventry through a nursery school, school nursery classes and in private, voluntary and independent settings, including child minders, preschools and day nurseries. The type of provision can be categorised as follows:

<table>
<thead>
<tr>
<th></th>
<th>Number of settings</th>
<th>Number of places</th>
</tr>
</thead>
<tbody>
<tr>
<td>Childcare on non-domestic premises</td>
<td>99</td>
<td>4,809</td>
</tr>
<tr>
<td>Childminders</td>
<td>271</td>
<td>1,754</td>
</tr>
<tr>
<td>Nursery classes/school</td>
<td>65</td>
<td>3,434</td>
</tr>
<tr>
<td>Out of school provision</td>
<td>85</td>
<td>n/a</td>
</tr>
<tr>
<td>Holiday schemes</td>
<td>27</td>
<td>n/a</td>
</tr>
<tr>
<td>Childcare on school sites</td>
<td>11</td>
<td>293</td>
</tr>
<tr>
<td>Independent school sites offering early years provision</td>
<td>5</td>
<td>n/a</td>
</tr>
</tbody>
</table>

Data as of 1st September 2019

Coventry’s Childcare Sufficiency Assessment 2017/18 sets out the gap analysis and recommendations for ensuring that sufficient places are made available for families and it closely aligns to the Schools One Strategic Plan. In summary, childcare provision within Coventry has continued to grow and quality continues to remain high. Growth has been needed within the city due to the implementation of the 30 hour extended entitlement offer for families. This has required targeted development of places through capital expansion and a focus on partnership working to enable sufficient capacity to meet DFE delivery targets. The planned significant increase in new housing, employment and retail development will increase demand for childcare. Coventry local authority has a statutory duty to ensure, so far as is reasonably practicable, sufficient childcare to meet the needs of working parents and those studying to work, and to secure prescribed early years provision free of charge. Where parents choose to take-up their early year’s entitlements for 2, 3 and 4 year olds may change over the next few years. As 30 hours childcare

---

10 Information provided by the Coventry Childcare Sufficiency Assessment 2017/18
becomes embedded and new parents become eligible for the early year’s entitlements, demand may change with parents seeking more flexible childcare provision for example open for longer hours, stretched across school holidays and to support weekend work.

In order to meet these challenges, achieve the participation targets for Early Education entitlements and support a good level of development at the end of the Foundation Stage, the following recommendations will be required and form the basis of the Early Years’ Service work stream action plans.

- To increase capacity of childcare in line with growth and employment to meet the statutory requirements for all children aged 0-14 years old (and up to 18 years old for children with Special Educational Needs or Disability).
- Assess the variety of options for older children within primary and secondary during non-school hours including before/after school and holiday provision. Explore demand and take up of this provision to inform actions in specific areas of the city. Provide a targeted focus on the quality delivery of services for this age group.
- Childcare and early year’s provision needs to be considered when new housing is planned, to ensure any new families moving into the area, or any increase in overall population, can access childcare and early years provision to meet their needs. Consider opportunities for Section 106 funding to support capacity development (contributions from developers towards the costs of providing community and social infrastructure which are required as a result of new development taking place).
- Ensure parents are aware of the support available to them to reduce the cost of childcare including the early year’s entitlements and Tax Free Childcare (TFC). Encourage settings to register to deliver Tax Free Childcare. Work with employers and Jobcentre Plus to ensure working parents and those moving into employment are aware of support to meet the costs of childcare, flexibility options and to promote childcare settings locally to support choice.
- Further work with providers to support robust assessment of parental demand at a local level, and to use findings to consider business opportunities to adapt their offer to meet identified demand. This may include longer days or stretching delivery across the year.
- Support cluster working between schools to offer sustainable models of delivery (including provision across the school holidays). Support partnership working across different types of provision (including sessional provision and childminders) to ensure parents have access to flexible and stretched provision, and providers can maximise occupancy to ensure sustainability of provision.
- Continue to increase the take-up of all early education entitlements with a particular focus on the universal early year’s entitlement for 3 and 4 year olds. Support opportunities for providers to maximise funding across all early years
entitlements, in order to protect provision for 2 year olds and 3 and 4 year olds (universal).

- Drive workforce development improvements within the sector to address growth in services and the decreasing interest in childcare as a career choice within the sector.
- Promote childminding as a profession in order to increase overall numbers of childminders across the city in order to reverse the decline in numbers of people interested in working in this childcare type.
- Investigate possible barriers for parents and providers to the take up and delivery of provision for children with SEND. Ensure information available for parents reflects what inclusive provision is on offer across the city.
- Work across the early year’s sector to improve the attainment level for all children at the end of the foundation stage. Reduce levels of inequality and narrow the educational gap between those most disadvantaged and their peers.
- Monitor and drive quality improvement of Ofsted outcomes to ensure sufficient childcare of high quality is available.

An action plan is in place to deliver these recommendations and support management of the market. Childcare provision needs are ever changing as demand fluctuates from families. The current focus for Coventry for early years and childcare provision is to sustain places we have developed over the past 4 years, availability of flexible education entitlements offers and developing partnership working to enable choice for families across the city.

7.6 Primary Context

Significant amount of work by the School Improvement team, in liaison with the schools, has resulted in there being only 6 Ofsted rated ‘Requires Improvement’ or ‘Inadequate’ Coventry Schools. Coventry has been delivering additional primary places since 2008. The vast majority of these have been OFSTED rated ‘good’ or ‘outstanding’ schools.

The below table highlights the phasing of these expansions and the overall number of additional places added. The 37.3FE added in permanent format equates to 1120 additional Reception places for children. There were a further 2 bulge classes added at Edgewick, and at Moseley which temporarily increased capacity in Reception for a single year before reducing back down to the agreed PAN.
Given the shifting movement of births within Coventry from the Binley and North East of the city, which has a falling birth rate, towards the North and West of the City where births are starting to stabilise and, in some areas, continuing to increase. As this cohort moves through the primary phase, alongside existing primary cohorts, and starts to impact upon secondary places the level of secondary school places required will rise.

![Primary Forms of Entry Added](image)

**Primary Forms of Entry Added**

<table>
<thead>
<tr>
<th>Year</th>
<th>Additional Permanent FE Created in that Year</th>
<th>Cumulative FE Added</th>
</tr>
</thead>
<tbody>
<tr>
<td>2008</td>
<td>3</td>
<td></td>
</tr>
<tr>
<td>2009</td>
<td>5</td>
<td></td>
</tr>
<tr>
<td>2010</td>
<td>5</td>
<td></td>
</tr>
<tr>
<td>2011</td>
<td>10</td>
<td></td>
</tr>
<tr>
<td>2012</td>
<td>7</td>
<td></td>
</tr>
<tr>
<td>2013</td>
<td>10</td>
<td></td>
</tr>
<tr>
<td>2014</td>
<td>20</td>
<td></td>
</tr>
<tr>
<td>2015</td>
<td>25</td>
<td>35</td>
</tr>
<tr>
<td>2016</td>
<td>35</td>
<td>35</td>
</tr>
<tr>
<td>2017</td>
<td>40</td>
<td>35</td>
</tr>
</tbody>
</table>

**8 Future Need**

**8.1 Primary**

Since 2011 Coventry has undergone a significant primary expansion programme. Circa 37 forms of entry have been added to primary capacity. This coupled with the declining birth rate means the surplus capacity across primary schools is rising.

The below table breaks down below the rate by catchment area. As can be seen across the majority of the planning areas, births are declining in Coventry, whilst in certain areas particularly the West of Coventry the birth rate is continuing to increase.
Given this reduction in birth rate it is likely to have a significant impact upon the number of surplus school places in the City.

<table>
<thead>
<tr>
<th>PLANNING AREA</th>
<th>Current Spaces in Reception in Planning Area</th>
<th>Difference between 2019 and 2023 Births</th>
<th>Provisional places in Reception available in 2023</th>
</tr>
</thead>
<tbody>
<tr>
<td>West Central</td>
<td>36</td>
<td>22</td>
<td>14</td>
</tr>
<tr>
<td>North West</td>
<td>17</td>
<td>14</td>
<td>3</td>
</tr>
<tr>
<td>Longford</td>
<td>50</td>
<td>19</td>
<td>31</td>
</tr>
<tr>
<td>East</td>
<td>22</td>
<td>-11</td>
<td>33</td>
</tr>
<tr>
<td>South</td>
<td>52</td>
<td>-28</td>
<td>80</td>
</tr>
<tr>
<td>North East</td>
<td>82</td>
<td>-25</td>
<td>107</td>
</tr>
<tr>
<td>North</td>
<td>6</td>
<td>-25</td>
<td>31</td>
</tr>
<tr>
<td>West</td>
<td>2</td>
<td>-18</td>
<td>20</td>
</tr>
<tr>
<td>South East</td>
<td>18</td>
<td>-20</td>
<td>38</td>
</tr>
<tr>
<td>East Central</td>
<td>58</td>
<td>-46</td>
<td>104</td>
</tr>
<tr>
<td>Coundon</td>
<td>7</td>
<td>-13</td>
<td>20</td>
</tr>
<tr>
<td>Tile Hill</td>
<td>22</td>
<td>-28</td>
<td>50</td>
</tr>
<tr>
<td>North Central</td>
<td>78</td>
<td>-70</td>
<td>148</td>
</tr>
<tr>
<td>Binley</td>
<td>22</td>
<td>-42</td>
<td>64</td>
</tr>
<tr>
<td>City Wide</td>
<td>472</td>
<td>-271</td>
<td>743</td>
</tr>
</tbody>
</table>

As the above table suggests this will create significant levels of surplus at Reception in 2023. As the DfE recommend have between 4-8% surplus places, having 743 surplus places in Reception in 2023 will leave Coventry with close to 15% surplus capacity.

We are working towards a sustainable level of surplus places in the city. There are local fluctuations in birth rates and migration rates which create challenges. It is our intention to

---

Data correct as of 18/10/19.
ensure sufficient places whilst avoiding oversupply and without exceeding 5% surplus places within a planning area.

<table>
<thead>
<tr>
<th>Year</th>
<th>Forecast Level of Surplus/Available Capacity</th>
</tr>
</thead>
<tbody>
<tr>
<td>Primary Planning Area</td>
<td>2019/20</td>
</tr>
<tr>
<td>North</td>
<td>2%</td>
</tr>
<tr>
<td>North Central</td>
<td>13%</td>
</tr>
<tr>
<td>East Central</td>
<td>13%</td>
</tr>
<tr>
<td>West Central</td>
<td>11%</td>
</tr>
<tr>
<td>Longford</td>
<td>9%</td>
</tr>
<tr>
<td>North East</td>
<td>19%</td>
</tr>
<tr>
<td>East</td>
<td>4%</td>
</tr>
<tr>
<td>Binley</td>
<td>9%</td>
</tr>
<tr>
<td>South East</td>
<td>5%</td>
</tr>
<tr>
<td>South</td>
<td>12%</td>
</tr>
<tr>
<td>Tile Hill</td>
<td>11%</td>
</tr>
<tr>
<td>West</td>
<td>-1%</td>
</tr>
<tr>
<td>North West</td>
<td>5%</td>
</tr>
<tr>
<td>Coundon</td>
<td>1%</td>
</tr>
<tr>
<td>City Wide</td>
<td>9%</td>
</tr>
</tbody>
</table>

Given this forecast level of surplus for the plan period, DfE recommendations suggest that best practise for Coventry would be for schools in the

- South
- North East
- East Central
- Binley
- South East
- South
- Tile Hill
- and, North Central\(^\text{12}\)

planning areas to look at potentially temporarily decommissioning places to adjust supply to meet future reductions in demand. Coventry Local Authority will look to facilitate those connections between head teachers, governing bodies and school finance to examine where parties are in agreement over potential reduction of PAN.

Headteachers are encouraged to contact the Local Authority to discuss the PAN of the school if they are concerned about the number of surplus places the school is likely to hold.

8.2 Secondary

\(^{12}\) Please see Appendix 1
The large cohort of pupils moving through primary provision is due to impact upon secondary provision from September 2018. In order to meet the need for additional provision without providing too much surplus capacity in future years, it is proposed to expand secondary places using a mixture of temporary ‘bulge’ and permanent expansions.

As set out below, Phase One was presented to Cabinet in October 2018 and outlines the planned temporary and permanent increases up to 2021. To address the further forecast shortfall of places between 2022 and 2024, Phase Two outlines the agreement between the Local Authority and the Coventry Secondary Headteacher Partnership to meet the additional places required. This will continue to be reviewed annually in line with updated pupil forecasts.

All schools are required to consult as part of the expansion programme.

Phase One

In September 2018, the LA added an additional 50 places across 5 different secondary schools. These were temporary increases and did not require any school to expand. The additional 50 places were accommodated in the below schools:

- Bishop Ullathorne – 10 places
- Blue Coat – 10 places
- Cardinal Newman – 5 places
- Coundon Court – 15 places
- Whitley – 10 places

In September 2019, an additional 8 forms of entry (235 year 7 places) were added using a mixture of temporary and permanent expansions within existing Coventry schools.

The temporary increases are outlined below:

<table>
<thead>
<tr>
<th>School</th>
<th>PAN Increase</th>
<th>Start Date</th>
</tr>
</thead>
<tbody>
<tr>
<td>Caludon Castle</td>
<td>from 240 to 270</td>
<td>September 2019</td>
</tr>
<tr>
<td>Foxford</td>
<td>from 180 to 185</td>
<td>September 2019</td>
</tr>
<tr>
<td>Lyng Hall</td>
<td>from 150 to 180</td>
<td>September 2019</td>
</tr>
<tr>
<td>Sidney Stringer</td>
<td>from 210 to 240</td>
<td>September 2019</td>
</tr>
</tbody>
</table>

The permanent increases are outlined below:

<table>
<thead>
<tr>
<th>School</th>
<th>PAN Increase</th>
<th>Start Date</th>
</tr>
</thead>
<tbody>
<tr>
<td>Cardinal Newman</td>
<td>from 220 to 250</td>
<td>September 2019</td>
</tr>
<tr>
<td>Coundon Court</td>
<td>from 285 to 345</td>
<td>September 2019</td>
</tr>
<tr>
<td>President Kennedy</td>
<td>from 270 to 300</td>
<td>September 2019</td>
</tr>
<tr>
<td>Whitley</td>
<td>from 160 to 180</td>
<td>September 2019</td>
</tr>
</tbody>
</table>

In September 2020, an additional 2 forms of entry (60 year 7 places) are planned using a mixture of temporary and permanent expansions within existing Coventry schools.

---

13 This was agreed separately to Partnership agreement; the school permanently increased their PAN to 265 from September 2018.
The temporary planned increases are outlined below:

- President Kennedy increasing PAN from 300 to 330 for September 2020 only.

The permanent planned increases are outlined below:

- Barr’s Hill increasing PAN from 131 to 161 from September 2020.

In September 2021, an additional 6.5 forms of entry (199 year 7 places) are planned using a mixture of temporary and permanent expansions within existing Coventry schools.

The temporary planned increases are outlined below:

- West Coventry increasing PAN from 237 to 297 for September 2021 only.
- Westwood increasing PAN from 157 to 217 for September 2021 only.

The planned permanent increases are outlined below:

- Barr’s Hill increasing PAN from 161 to 180 from September 2021.
- Ernesford Grange increasing PAN from 180 to 210 from September 2021.
- Finham Park increasing PAN from 240 to 270 from September 2021.

The below table demonstrates the sufficiency position if the additional places are added in this way:
Phase Two

The above table shows how the Phase One of the capital programme will meet demand. From September 2022 onwards, with increasing pupils’ numbers, there is an additional basic need pressure which will require the delivery of a phase 2.\textsuperscript{14} To address the forecast shortfall of places and provide a sufficient surplus of places city-wide, it is expected that there will be the following requirement for additional places

- In September 2022, an additional 8 forms of entry (FE) will be needed.
- In September 2023, an additional 10 FE will be needed.
- In September 2024, an additional 6 FE will be needed.

Due to the anticipated decline in pupil numbers from 2025, which is forecast to reduce. It is expected that the required number of places here will be met by the 2019-2021 permanent expansions. Therefore, the proposal for Phase Two is to use temporary increases. This solution would allow the Coventry Partnership to future proof by avoiding an oversupply of places long term and ensuring that no school has a significant amount of spaces. Proposals for potential options for the phase have been discussed with Secondary Heads with a formal plan being finalised in December 2019 and brought for political approval in March 2020.

8.3 SEND Provision

Introduction

The Special Educational Needs & Disability (SEND) School Place Planning Strategy for Coventry City Council sets the baseline for specialist provision across the city and summarises a range of factors that are driving the need for change over the short to medium term.

This strategy gives more in-depth information regarding the current and future SEND pupil population and outlines the options available to add or make changes to specialist provision for Coventry pupils. The aim of this strategy is to help the City Council, schools, parents and the wider community understand the need for specialist provision planning and to establish future demand. It will provide a basis against which future specialist provision will be planned.

The agreed key principles for meeting the demand for SEND school places is set out below:

- A whole system approach will be adopted, to secure a continuum of provision that reflects the continuum of need

\textsuperscript{14} This is in addition to the agreed expansions for 2019 – 2021 (Phase One).
The majority of children with an EHC Plan will have their needs met within a community mainstream school
Where possible the current special school(s) estate will be expanded to meet demand and ensure sustainability
When additional or new provision is required, this will be secured through utilising existing vacant or underused education provision
The condition of existing provision will be addressed to secure minimum standards and maximise capacity
The special school offer will negate the need to place out of City because of a shortfall in local provision
Consideration of reviewing and extending the age range of existing provision to address any ‘bottle-necks’ in transition.

The provision strategy to meet the needs of Coventry with SEND includes:

- The further development and review of current enhanced resourced provision (ERP), which will lead to a range of ERP bases across the primary and secondary phase that reflects current priority areas of need including ASC (Autistic Spectrum Condition) and SEMH (Social, Emotional, and Mental Health).

- Prioritisation of the current special school estate to develop it for purpose schools within the available capital funds. Explore, where possible and advantageous, the opportunity to move, expand and/or rebuild special schools on alternative sites.

- Increase, where required, special secondary provision within the budget envelope of the High Needs Block for commissioned places.

<table>
<thead>
<tr>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>1,349</td>
<td>1,321</td>
<td>1,315</td>
<td>1,292</td>
<td>1,280</td>
<td>1,432</td>
<td>1,559</td>
<td>1,724</td>
<td>1,863</td>
<td>2,084</td>
</tr>
</tbody>
</table>

In 2014 the Children and Families Act came into effect, and subsequently the introduction of the Code of Practice (2014) covering the extension of the age range for special education needs (SEN) for young people up to and including the age of 25. This also saw the Education, Health and Care plans (EHC plans) brought into effect to replace the statements. The increase in EHC plans in Coventry is displayed in the chart below:
The increase in the number of plans since 2014, is a clear indicator from the Code of Practice (2014), and the extended age range of 25.

These numbers encompass all pupils with SEND on roll at schools located in Coventry, including independent schools and pupils that are resident in Coventry but attend schools outside of Coventry. With the number of Education, Health and Care Plans (EHCPs) increasing over the last few years, this has resulted in an increasing number of children in high cost Out of City Placements.

National and Local Policy Context

The Government’s vision for children and young people with special educational needs (SEN) and disabilities is the same as for all children and young people – that they achieve well, and lead happy and fulfilled lives. The Children and Families Act 2014 places important statutory responsibilities on local authorities for supporting children and young people with special educational needs (SEN) and disabilities. This is a vital role that local authorities retain in an increasingly school-led education system and one that requires long-term strategic planning, informed by detailed local knowledge enhanced through consultation with parents and carers, and good relationships with local schools.

Local authorities must ensure there are sufficient good school places for all pupils, including those with SEN and disabilities. Through long-term strategic planning Councils are seeking to reconfigure specialist places to ensure that they can meet need whilst containing spending within the constraints of the High Needs budget and available capital resources.

The Special Educational Needs & Disability Provision Strategy is part of a wider framework of policy documents that support the One Coventry Council Plan (2016-24) which sets out the 3 Council priorities:

- Globally connected
Current School Estate

Specialist SEND Provision located in Coventry is comprised of 8 special schools: six maintained special schools and two special academies. The total number of commissioned placements at Coventry’s Special Schools, is exhausted. Whilst there is capacity to increase the number of primary placements for generic learning difficulty, there is generally no physical capacity to expand secondary placements, without capital investment; with the exception of Corley secondary school, which caters for autism spectrum conditions (ASC).

The 8 schools are outlined in more detail below:

<table>
<thead>
<tr>
<th>School</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>Castle Wood</td>
<td>For pupils aged from 4-11 with a range of learning difficulties from profound and multiple, severe to moderate and with varying degrees of autistic spectrum conditions.</td>
</tr>
<tr>
<td>Baginton Fields</td>
<td>For pupils aged from 11-18 with a broad range of special educational need and disability; Autism, Sensory Impairment, Physical Disability, Communication Difficulties and Challenging Behaviours.</td>
</tr>
<tr>
<td>Corley Centre</td>
<td>For pupils aged from 11-18 with complex social and communication difficulties.</td>
</tr>
<tr>
<td>Sherbourne Fields</td>
<td>For pupils aged from 2-19 with a broad spectrum of need including physical disabilities, medical conditions and learning needs.</td>
</tr>
<tr>
<td>Tiverton</td>
<td>For pupils aged from 3-11 with severe learning difficulties or profound and multiple learning difficulties. They may also have some physical or sensory impairment, or an autistic spectrum disorder.</td>
</tr>
<tr>
<td>Woodfield</td>
<td>Based across two sites, a Primary for pupils aged 4-11 and a Secondary for pupils aged 11-16 (and support until the age of 18). Many of the pupils needs range from dyslexia, dyspraxia, being on the Autistic Spectrum (ASC), or having Attention Deficit Hyperactive Disorder (ADHD), Pathological Demand Avoidance (PDA) and attachment difficulties.</td>
</tr>
<tr>
<td>RNIB Three Spires</td>
<td>For pupils aged 4-11 with learning difficulties and additional needs, with over half of the pupils having autism spectrum conditions (ASC) and others have additional needs, including sensory impairment, communication difficulties and physical difficulties.</td>
</tr>
<tr>
<td>Riverbank</td>
<td>For pupils aged 11-19 with a broad range of special educational need and disability. Learning is influenced by Autism, Moderate and Severe Learning disabilities, Sensory Impairment, Physical and medical difficulties, Communication Difficulties and Social, Emotional and Mental Health difficulties linked with their special educational needs.</td>
</tr>
</tbody>
</table>
Breakdown of type of need

There are several categories of SEN need, which bring different severities of support required by an individual. A particular individual with a SEN need is assessed on an individual basis and an EHCP plan is created and identifies the type of support they require. This then forms the basis of criteria used to identify which school will best cater for an individual pupil needs.

Historically, Moderate Learning Difficulties (MLD) represented the largest percentages of need. However, current demand identifies an evidenced growth in Social, Emotional Mental Health (SEMH) and Autistic Spectrum Condition/Disorder (ASC/D). ASC is now identified as the highest prevalence of additional need in the city. An analysis of the type of need based on current EHCPs identifies a shift as follows:

<table>
<thead>
<tr>
<th>School Name</th>
<th>September 2018 Commissioned Places</th>
<th>May 2019 Commissioned Places</th>
<th>September 2019 Commissioned Places</th>
<th>Total increase</th>
</tr>
</thead>
<tbody>
<tr>
<td>Castle Wood</td>
<td>139</td>
<td>139</td>
<td>147</td>
<td>8</td>
</tr>
<tr>
<td>Three Spires</td>
<td>84</td>
<td>84</td>
<td>84</td>
<td>0</td>
</tr>
<tr>
<td>Riverbank</td>
<td>164</td>
<td>164</td>
<td>164</td>
<td>0</td>
</tr>
<tr>
<td>Corley</td>
<td>96</td>
<td>96</td>
<td>118</td>
<td>22</td>
</tr>
<tr>
<td>Tiverton</td>
<td>70</td>
<td>74</td>
<td>95</td>
<td>25&lt;sup&gt;15&lt;/sup&gt;</td>
</tr>
<tr>
<td>Baginton Fields</td>
<td>100</td>
<td>102</td>
<td>116</td>
<td>16</td>
</tr>
<tr>
<td>Sherbourne Fields</td>
<td>148</td>
<td>157</td>
<td>167</td>
<td>19</td>
</tr>
<tr>
<td>Woodfield</td>
<td>160</td>
<td>160</td>
<td>160</td>
<td>0</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td><strong>961</strong></td>
<td><strong>976</strong></td>
<td><strong>1043</strong></td>
<td><strong>82</strong></td>
</tr>
</tbody>
</table>

<sup>15</sup> The increase of commissioned places at Tiverton School is being completed as part of their move to the Whitley Abbey site.
As the graph identifies the breakdown of need with SEN, below is the definition of such needs:

SLCN – Speech, Language and Communication Needs  
ASC – Autistic Spectrum Condition  
SEMH – Social, Emotional and Mental Health  
MLD – Moderate Learning Disability  
SPLD – Specific Learning Disability  
OTH – Other  
PD – Physical Disability  
VI – Visual Impairment  
HI – Hearing Impairment  
PMLD – Profound and Multiple Learning Disability  
SLD – Severe Learning Disability

It is to be noted that each pupils primary need does not look at their underlying need or interconnectivity of the classifications as listed above.

**Historical Growth**  
Significant growth in capacity for primary generic learning difficulties has been achieved through the expansion of Tiverton School which has been rebuilt, on the former Alice Stevens School site. The primary site of Woodfield Special School has been identified in the local plan as having some potential for development, and currently a draft masterplan is in development to scope options for integrating the primary and secondary sites onto one site, with the aim of responding to growth demands.

**Future Need Methodology**  
It is widely known that mainstream population has grown over the last few years. It is more commonly acknowledged within primary, where large scale expansion of mainstream capacity has taken place. We therefore see there is a direct correlation at least at primary level, of the growth of EHCP’s being linked to the growth in mainstream. With the size of the mainstream primary cohort now starting to stabilise, it can be assumed by way of forecast that the number of primary pupils with additional need will similarly stabilise.

<table>
<thead>
<tr>
<th>Proportion of EHCP (Education, Health, and Care Plan) of total cohort</th>
<th>2015</th>
<th>2016</th>
<th>2017</th>
<th>2018</th>
</tr>
</thead>
<tbody>
<tr>
<td>Early Years Cohort</td>
<td>0.69%</td>
<td>1.36%</td>
<td>1.79%</td>
<td>1.67%</td>
</tr>
<tr>
<td>Primary Cohort</td>
<td>1.85%</td>
<td>1.94%</td>
<td>1.98%</td>
<td>2.24%</td>
</tr>
<tr>
<td>Secondary Cohort</td>
<td>3.53%</td>
<td>3.44%</td>
<td>3.40%</td>
<td>3.44%</td>
</tr>
</tbody>
</table>

The above figures show that despite the large raw increase in Primary SEN number’s, proportionally EHCP numbers have only slightly increased in primary compared to the
population growth. 2018 jump in primary is due to an increase in plans being issued. It also identifies a clear stabilising numbers in proportion for Secondary need. Given that the secondary cohort is increasing the largest, this proportion will similarly increase.

Forecasts
The below forecasts have been arrived at by analysing the mainstream forecasts and projecting the % of EHC numbers forward.

<table>
<thead>
<tr>
<th>All SEN (number of EHCPs)</th>
<th>(0-4)</th>
<th>Primary</th>
<th>Secondary</th>
<th>Post – 16</th>
</tr>
</thead>
<tbody>
<tr>
<td>2019</td>
<td>80</td>
<td>780</td>
<td>750</td>
<td>432</td>
</tr>
<tr>
<td>2020</td>
<td>94</td>
<td>789</td>
<td>772</td>
<td>458</td>
</tr>
<tr>
<td>2021</td>
<td>101</td>
<td>787</td>
<td>800</td>
<td>475</td>
</tr>
<tr>
<td>2022</td>
<td>100</td>
<td>780</td>
<td>830</td>
<td>487</td>
</tr>
<tr>
<td>2023</td>
<td>105</td>
<td>769</td>
<td>859</td>
<td>489</td>
</tr>
<tr>
<td>2024</td>
<td>98</td>
<td>749</td>
<td>870</td>
<td>502</td>
</tr>
</tbody>
</table>

No increase is shown in the forecasts for Early Years. This is due to the fact that, despite a 0-4 care: on the whole, children are too young to have an EHCP in place during the Early Years phase and Coventry has no physical capacity to arrange specialist early years provision, within the special school sector. This is a priority area for future early intervention development, which will be subject to high needs block affordability and prioritisation of special school space.

For indications of trends at the Early Years stage, data around SEN support will need to be considered. The SEND support forecast data is showing a 78% increase in demand over the same 5-year period.

The largest increases are in Secondary and Post 16. Nationally, and within Coventry, there is a higher percentage of pupils with EHCP at Secondary than Primary. Larger primary cohorts are moving through into secondary, impacting upon the availability of places. With the extension of the age range to 25; Post – 16 EHCP numbers have increased and are forecast to increase further, and this has placed unplanned pressure on Key Stage 5 and FE provision, which is envisaged to continue.

There is forecast to be small increases in Primary SEN. This is due in part to a stabilising of the birth rates and larger cohorts moving through into Secondary phase.

Based on current trends and using forecast data for September 2020, we can model the anticipated increase in EHCPs for Coventry pupils. Assuming the current trends continue, the table below shows the expected growth in demand, across Primary and Secondary, by type of need. This then further breaks down the Primary and Secondary forecasts into type of need, and highlights a growing need for additional Secondary SEN places in the city. It
also identifies that there will be a significant shortfall of places within ASC, SEMH, and Broad Spectrum.

<table>
<thead>
<tr>
<th>Year</th>
<th>SLC N</th>
<th>ASC</th>
<th>SEM H</th>
<th>MLD</th>
<th>SPLD</th>
<th>OTH</th>
<th>PD</th>
<th>VI</th>
<th>HI</th>
<th>PML D</th>
<th>SLD</th>
</tr>
</thead>
<tbody>
<tr>
<td>2017</td>
<td>102</td>
<td>350</td>
<td>159</td>
<td>226</td>
<td>29</td>
<td>37</td>
<td>33</td>
<td>8</td>
<td>20</td>
<td>65</td>
<td>184</td>
</tr>
<tr>
<td>2018</td>
<td>106</td>
<td>364</td>
<td>166</td>
<td>236</td>
<td>30</td>
<td>38</td>
<td>35</td>
<td>8</td>
<td>21</td>
<td>66</td>
<td>191</td>
</tr>
<tr>
<td>2019</td>
<td>109</td>
<td>373</td>
<td>173</td>
<td>244</td>
<td>31</td>
<td>39</td>
<td>36</td>
<td>9</td>
<td>22</td>
<td>68</td>
<td>195</td>
</tr>
<tr>
<td>2020</td>
<td>112</td>
<td>382</td>
<td>178</td>
<td>251</td>
<td>32</td>
<td>40</td>
<td>36</td>
<td>9</td>
<td>22</td>
<td>69</td>
<td>199</td>
</tr>
<tr>
<td>2021</td>
<td>114</td>
<td>390</td>
<td>183</td>
<td>258</td>
<td>32</td>
<td>42</td>
<td>37</td>
<td>9</td>
<td>23</td>
<td>69</td>
<td>202</td>
</tr>
<tr>
<td>2022</td>
<td>117</td>
<td>397</td>
<td>188</td>
<td>264</td>
<td>33</td>
<td>42</td>
<td>38</td>
<td>9</td>
<td>23</td>
<td>70</td>
<td>205</td>
</tr>
<tr>
<td>2023</td>
<td>117</td>
<td>400</td>
<td>190</td>
<td>266</td>
<td>34</td>
<td>43</td>
<td>38</td>
<td>9</td>
<td>24</td>
<td>70</td>
<td>205</td>
</tr>
<tr>
<td>2024</td>
<td>117</td>
<td>400</td>
<td>190</td>
<td>267</td>
<td>34</td>
<td>43</td>
<td>38</td>
<td>9</td>
<td>24</td>
<td>70</td>
<td>203</td>
</tr>
</tbody>
</table>

**Breakdown**

This means that there is an increased need for SLCN places, that steady from 2022 to 2024. ASC and SEMH continue to increase year on year, steadying in 2023 and 2024. The forecast growth identifies a potential increase of 50 ASC placements and 31 SEMH placements by 2024.

Numbers remain high but with a steady increase in both MLD and SLD also. Numbers remain low and steady for the other types of EHCP’s, but overall it still shows an increase nevertheless going forwards.

This growth will require additional capacity within the system to secure statutory provision. This analysis does not take into account the number of pupils with EHC Plans currently placed in mainstream schools, who have been identified as requiring specialist placements in the near future.

**Future need**

Using September 2017 commissioned places as a baseline and assuming that the recent increase in demand is permanent, the following cumulative forecast for demand increase by phase between 2019 and 2022 is set out:

The analysis indicates that currently 63% of pupils with an EHCP are placed in specialist provision. Based on this statistic, the table above outlines the forecast need for additional places for children with EHCP across all year groups. These additional places will be added across mainstream and special schools. The special school places are separated for secondary. This assumes the threshold for EHCP continues at the same level and
therefore the split between pupils attending special schools (63%) and mainstream (37%) stays the same.

The SEND code of practice states that it is expected that “the majority of C&YP with SEN or Disability will have their needs met within local mainstream, EY settings, schools or colleges. In comparison to Coventry’s statistical neighbours, Coventry has a higher proportion of pupils with an EHCP within a special school.

<table>
<thead>
<tr>
<th></th>
<th>Total Pupils in Mainstream</th>
<th>Total Pupils in Special School</th>
<th>% of Pupils with EHC in Special</th>
<th>Proportion of Cohort with an EHCP</th>
</tr>
</thead>
<tbody>
<tr>
<td>Bolton</td>
<td>768</td>
<td>705</td>
<td>48%</td>
<td>2.87%</td>
</tr>
<tr>
<td>Tameside</td>
<td>183</td>
<td>383</td>
<td>68%</td>
<td>1.64%</td>
</tr>
<tr>
<td>Wigan</td>
<td>587</td>
<td>646</td>
<td>52%</td>
<td>2.74%</td>
</tr>
<tr>
<td>Leeds</td>
<td>1,000</td>
<td>1,207</td>
<td>55%</td>
<td>1.78%</td>
</tr>
<tr>
<td>Sheffield</td>
<td>894</td>
<td>1,094</td>
<td>55%</td>
<td>2.47%</td>
</tr>
<tr>
<td>Derby</td>
<td>634</td>
<td>693</td>
<td>52%</td>
<td>3.06%</td>
</tr>
<tr>
<td>Coventry</td>
<td>481</td>
<td>858</td>
<td>64%</td>
<td>2.33%</td>
</tr>
<tr>
<td>Medway</td>
<td>559</td>
<td>736</td>
<td>57%</td>
<td>3.03%</td>
</tr>
<tr>
<td>Portsmouth</td>
<td>453</td>
<td>485</td>
<td>52%</td>
<td>3.29%</td>
</tr>
<tr>
<td>Southampton</td>
<td>469</td>
<td>523</td>
<td>53%</td>
<td>3.08%</td>
</tr>
</tbody>
</table>

Statistically, it might be argued that Coventry has a high percentage of children with EHCPs placed in specialist provisions. However, there is no evidence that the threshold for placement in Coventry is lower than other LAs. Initial work suggests that Coventry’s profile of complex SEN is high. Further investment will be made in supporting mainstream schools to build capacity within the community through a range of targeted training and support to schools. This programme will be designed in partnership with schools and underpin the Inclusion Strategy.

**Primary**

The amount of pupils in primary mainstream with additional needs has also been rising requiring schools to have to meet a broader range of pupils needs with no additional funding. In order to meet the needs of these pupils, it is proposed to create several resourced provision units on mainstream school sites making use of existing education assets. The resourced provision will be targeted towards primary age pupils with Autism Spectrum Condition and Social, Emotional and Mental Health (SEMH)

New specialist provision attached to mainstream schools has proved able to meet some of the needs of many complex learners with Autism Spectrum Condition and Social, Emotional and Mental Health (SEMH) needs whilst allowing the individuals to remain in their own communities and not face overly arduous travel. Coventry has developed a model
of provision based on best practice and experience, both internally and that of other local authorities. This best practice states that resource provisions can accommodate to 10 learners in secondary and up to 8 learners in primary on a mainstream school or academy site. However, this is a variable depending on the type of provision being provided.

It is envisaged that the increased demand arising from the projected increase in pupil numbers, could be accommodated within resourced provision (RP) over the next 5 years. The RP would need to be targeted for primary age pupils with ASC and SEMH.

It is envisaged that an additional 3-5 resourced provision would be required over the plan period, assuming a population of 8-12 pupils per provision. It is estimated that this would cost c.£200k, in capital cost investment. Work is underway to identify areas of the city where education provision will be released and can be utilised for this purpose.

The priority, to provide sufficient and quality SEN provision, is to develop such provision on 4 - 5 school sites across the City as follows:

- In North Eastern Coventry at primary-phase schools
- In the East of Coventry area on a primary school site
- In central Coventry at a secondary school site.

However, given the relatively small distances involved these locations are quite flexible and of more concern would be inclusivity of the school; and the quality of provision being offered.

Secondary

Work is currently underway to scope options for integrating the primary and secondary sites of Woodfield Special School.

Both the Corley Centre and Baginton Fields have taken on additional pupils, with the addition of modular builds as part of the Capital Programme for 2019/20.

Post 16

Secondary special school provisions have developed an increased post 16 provision as a consequence of growth. As part of secondary mainstream expansion, partnerships with colleges and employment pathways including supported internships there is an opportunity to develop an extended SEND post 16 provision which would in turn release special school capacity. The old Tiverton building on Sherbourne Fields site, has been identified as potential to rebuild as post 16.

8.4 Proposed Strategic SEN Plan
8.4.1 SEND (Phase 1)

In November 2018, Cabinet Members agreed to the principle of expanding and relocating Woodfield Special School to the vacant former Woodlands School site. It is proposed to relocate Woodfield Special School in September 2021 to address split site, building
suitability, and capacity issues. This is subject to further detailed plans and financial approval. This project will enable the school to grow in capacity as set out below, increasing the number of SEMH places across primary and secondary phases:

Forecasted students places 2021-2024 Woodlands SEMH school
(Max intake 280) *assuming school move to new site 01/09/2021

<table>
<thead>
<tr>
<th>Year</th>
<th>Agreed 9/1/2018</th>
<th>Expected growth</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>2018</td>
<td>2023</td>
</tr>
<tr>
<td></td>
<td>2020</td>
<td>2024</td>
</tr>
<tr>
<td>Current</td>
<td>Intake Places</td>
<td>Intake Places</td>
</tr>
<tr>
<td>Primary</td>
<td>65</td>
<td>15 80</td>
</tr>
<tr>
<td>Secondary</td>
<td>68</td>
<td>16 84</td>
</tr>
<tr>
<td>Overall places available</td>
<td>133</td>
<td>164</td>
</tr>
<tr>
<td>Places away from full capacity</td>
<td>116</td>
<td>204</td>
</tr>
</tbody>
</table>

When fully occupied this will resolve the SEMH deficit of places, enabling children that are currently in ‘Out of City’ placements to be brought back into the City. This larger school site for both SEMH primary and secondary, will enable pupils of all age ranges to attend the and fulfil the increase in demand for SEN places; thus supporting the increase in the extended age range to 25 for SEND post-16 education.

8.4.2 SEND (Phase 2) – 2019

The phase two expansions are solely covering the additional places that we know are required for the 2019 academic year. No creation of further places that can be utilised, will come from these developments. They will be fulfilled from September 2020 onwards. The schools that form part of this phase 2 expansion, to fulfil the additional places required are: Baginton Fields, Corley Centre, Sherbourne Fields, and Castle Wood.

The following table shows the detail in how this is broken down:

<table>
<thead>
<tr>
<th>School Name</th>
<th>Sept 2018 Commissio ned Places</th>
<th>May 2019 Commissio ned Places</th>
<th>Variation</th>
<th>Sept 2019 Commissio ned Places</th>
<th>Variance to Sum-19</th>
<th>Total increase</th>
<th>Project detail</th>
<th>Estimated costs (£)</th>
<th>Funding source</th>
</tr>
</thead>
<tbody>
<tr>
<td>Castle Wood</td>
<td>139</td>
<td>139</td>
<td>0</td>
<td>147</td>
<td>8</td>
<td>8</td>
<td>Creating classrooms from previous 1 larger classroom</td>
<td>£20,000.00</td>
<td>Special Provision Fund</td>
</tr>
<tr>
<td>Corley Centre</td>
<td>96</td>
<td>96</td>
<td>0</td>
<td>118</td>
<td>22</td>
<td>22</td>
<td>Refurb of old residential unit to create 3 additional classrooms</td>
<td>£350,000.00</td>
<td>Special Provision Fund</td>
</tr>
<tr>
<td>Baginton Fields</td>
<td>100</td>
<td>102</td>
<td>2</td>
<td>116</td>
<td>14</td>
<td>16</td>
<td>Installation of classroom modular unit including hygiene suite</td>
<td>£360,000.00</td>
<td>Special Provision Fund</td>
</tr>
<tr>
<td>Sherbourne Fields</td>
<td>148</td>
<td>157</td>
<td>9</td>
<td>167</td>
<td>10</td>
<td>19</td>
<td>Remodel of existing classrooms to create 2 additional classrooms and breakout space</td>
<td>£270,000.00</td>
<td>Special Provision Fund</td>
</tr>
<tr>
<td>City wide</td>
<td>961</td>
<td>976</td>
<td>15</td>
<td>1043</td>
<td>67</td>
<td>82</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
As the table above shows, there was an increased need in places for September 2019. Castle Wood acquired an additional 8 pupils to the previous academic year, Corley Centre an additional 22, Baginton Fields an extra 16 pupils and Sherbourne Fields a further 19 places. This growth in additional places has been met using both refurb or remodelling of existing space, by way of adding additional teaching areas, and also by adding modular units on site to create further classrooms & breakout areas.

8.4.3 SEND (Phase 3) 2020 onwards

The current Year 5 (September 2020 into Secondary), is larger than the year 6 (September 2019 into Secondary) for pupils with EHCPs. Given that the Secondary capacity has been filled from 2019 children, this increase will mean a need for additional places. The main increases are evident with pupils attending Tiverton and Castle Wood school. This will impact upon the availability of Special school places, given that the schools are already, from September 2019, at full capacity at their already increased commissioned number.

Given that, historically, a significant number of pupils from Castle Wood attend Riverbank (last year; 2018 transfer - 80% of Castle Wood students transferred to Riverbank) and Tiverton children were split between Baginton Fields, Riverbank and Sherbourne Fields. This increase in pupils at these primary schools is likely to impact upon demand for places at Sherbourne and Riverbank in particular.

<table>
<thead>
<tr>
<th>School</th>
<th>2019 Transfer</th>
<th>2020 Transfer</th>
</tr>
</thead>
<tbody>
<tr>
<td>Castle Wood</td>
<td>16</td>
<td>26</td>
</tr>
<tr>
<td>RNIB Three Spires Academy</td>
<td>19</td>
<td>17</td>
</tr>
<tr>
<td>Sherbourne Fields School</td>
<td>5</td>
<td>5</td>
</tr>
<tr>
<td>The Corley Centre</td>
<td>2</td>
<td></td>
</tr>
<tr>
<td>Tiverton School</td>
<td>5</td>
<td>16</td>
</tr>
<tr>
<td>Woodfield School</td>
<td>15</td>
<td>15</td>
</tr>
<tr>
<td><strong>Grand Total</strong></td>
<td><strong>62</strong></td>
<td><strong>79</strong></td>
</tr>
</tbody>
</table>

From these figures it looks possible that further Secondary expansion may be required. Given the areas of demand and primary need of the pupils, there appears to be up to 3 potential options or a combination of all 3 options.

- Demolition of the Old Tiverton school building will enable use of the land to accommodate two, double modular build provisions. One used for a purpose-built provision for pupils with higher needs and require their own space separate to the main school building. The second modular build with internal reorganisation within the school, will allow for an additional 24 pupils to be taken on role in September 2020.
• Expansion of Riverbank school – the school has not recently been expanded and so there is potential to extend on the school site and take an additional 36 pupils onsite.
• Potential to utilise previous Extended Learning Provisions' (ELCs) on two of our mainstream school sites. There is currently a need for an additional 1FE (8 pupils) at Castle Wood Primary effective immediately. The reception age pupils are anticipated to join the school in early 2020, due to considerable reconfiguration works carried out at site. The shift in resource rooms, to make a new classroom with some wall and door movements, will allow for this additional classroom whilst maintaining essential staffing areas. Funding for this project will come from the Special Provision Fund.

Expanding on the above, below is the proposed options for academic years 2020/21 and 2021/22:

2020/21
Permanent Special School expansion wing has been identified at Riverbank Academy, with remodelling and relocation of car parking. This additional accommodation and site reconfiguration will be funded by the Special Provision Fund and Basic Need.

Sept 2020/21
It has been identified that there is a need for additional Enhanced Resource Provision’s (ERPs), and three areas of need will be commissioned on existing space at mainstream site’s to be identified. One provision is for ASD for 8 pupils, 2nd for SEMH for 8 pupils and a third for ASD/SEMH for 8 pupils (24 in total across 3 settings). This also forms part of the Special Provision Fund.

Sept 2021/22 – possible options
Although there are no plans set for 2021/22 in terms of permanent expansions at the current SEN estates, there could potentially be land available on the Old Tiverton site that may provide a suitable solution in the future. The majority of the current SEN estates are ideally not suitable for further expansion, but it maybe that feasibility studies can be carried out to see if the space currently utilised is used in the most effective way. This may identify some areas for reconfiguration and as a result create teaching space for use.

9. Post 16

Currently, all but 3 Secondary schools within Coventry have sixth form provision. These current arrangements have been developed as a collaborative approach across Coventry and provide sufficient sixth form places to meet the demand, variety and quality of education within the city.
There are a further three secondary schools within Coventry which do not have sixth forms, Seva, Eden Girls, and Finham Park 2 these are growing organically from Year 7 upwards. The decision for Eden Girls to open a sixth form has been delayed for the foreseeable future. However, it is anticipated that these new sixth forms will provide the additional spaces required to accommodate the increasing secondary and forecast sixth form numbers in the coming years.

Currently, the two largest sixth forms in Coventry are Caludon Castle and Blue Coat Church of England School. These two are the only sixth form provisions in Coventry to have in excess of 300 pupils across both years. At the other end of the scale there are 6 sixth forms within Coventry which have less than 100 pupils in both year groups. To resolve these low pupil numbers Coventry sixth forms, have, through partnership working, banded together, often through MAT links, to provide educational facilities and a range of curriculum which positively impacts upon student attainment.

In addition to this there are 2 general Further Education Colleges; Coventry College, (as a merger between City and Henley Campuses), and Hereward College, which is specifically for those pupils with additional needs. These provide more technical training and support, whilst also providing more academic teaching.

This mixed economy of sixth form provision allows for Year 11 pupils to study a wide range of subjects within the city boundary. Whilst also ensuring the quality of provision allows them to achieve their potential.
10. Alternative Provision (AP)

Hospital Education – SEMH Location: Whitmore Park Annex

Provision for children and young people who have difficulties in areas such as:

- Attending their usual school following hospitalisation or long term illness
- Reaching their full potential because of time missed at their usual school due to various medical conditions
- Re-integrating successfully back into their usual school.

Coventry Extended Learning Centre (CELC) – Link, Swanswell, Wyken

Provision for pupils who are experiencing behaviour difficulties within a mainstream school setting and are in Key Stage 3 & 4 (11-16). Previously some pupils will have been permanently excluded and most will have been at risk of permanent exclusion from their mainstream school.

There is a proposed option for a 2 storey expansion to the existing ‘The Link’ provision, to merge the current Swanswell centre pupils to create 1 larger provision to accommodate an approximate 60 additional pupils. As part of this, there would also be scope to take an extra 10 pupils taking the extra pupils to a potential of 70. Factoring in the existing 60 pupils at the Link, this could theoretically accommodate 130 pupils post expansion.

To help facilitate this, this project will also see a reconfiguration and part-refurbishment to the existing layout and structure, including a new reception area and multi-function office areas, to include space for when external professionals come in for appointments with the pupils. Additions of hair, beauty and nail salons that will be housed in this section of the provision, to provide a more purpose built curriculum. This helping to achieve a target set by Ofsted. Additional kitchen/canteen and dining facilities. As part of the ground floor extension, ‘The Link’ will see 4 new vocational subject workshop’s, showcasing fully accessible areas: electrical, plumbing, mechanic and bricklaying/plastering. As part of the first floor extension, this is where Core subjects English, maths and science will be taught. Overall in the extended ground and first floor, there is the possibility to create up to an additional 7 classrooms, with additional intervention rooms and a newly purpose built staff room. With the additional subjects being able to be taught at the centre, focussing on the core subjects and the vocational, this will aid in encouraging pupils to engage and support them post-education, and gaining recognised qualifications and gateway onto future vocational qualifications.

The initial budget has been outlined as being £2.2 million from the Education basic need resource. There is also a plan to add a small Multi-use Games Area (MUGA) to the existing land at the rear of the provision, to enhance the outdoor sporting facilities.
Provision for mainstream intervention programmed for National Curriculum Key Stage 1 and Key Stage 2 pupils who are at risk of exclusion and are struggling to meet the behavioural expectations of their school. The service provides short term, intensive support in a small group to improve resilience and self-regulation focused on enabling a child to be successfully integrated into their mainstream class group. The intervention is offered for up to 2 terms for 4 days per week, children remain in their registered school on the 5th day.

Appendices

Appendix 1 - Primary Planning Areas
<table>
<thead>
<tr>
<th>Primary Planning Area</th>
<th>School</th>
</tr>
</thead>
<tbody>
<tr>
<td>North</td>
<td>Holy Family Catholic</td>
</tr>
<tr>
<td></td>
<td>John Shelton</td>
</tr>
<tr>
<td></td>
<td>Parkgate Academy</td>
</tr>
<tr>
<td></td>
<td>Whitmore Park</td>
</tr>
<tr>
<td></td>
<td>Keresley Grange</td>
</tr>
<tr>
<td>North Central</td>
<td>Broad Heath</td>
</tr>
<tr>
<td></td>
<td>Edgewick</td>
</tr>
<tr>
<td></td>
<td>Hill Farm Academy</td>
</tr>
<tr>
<td></td>
<td>Stanton Bridge</td>
</tr>
<tr>
<td>East Central</td>
<td>Joseph Cash</td>
</tr>
<tr>
<td>----------------------</td>
<td>----------------------</td>
</tr>
<tr>
<td></td>
<td>St Augustine’s Catholic</td>
</tr>
<tr>
<td></td>
<td>John Gulson</td>
</tr>
<tr>
<td></td>
<td>Radford Academy</td>
</tr>
<tr>
<td></td>
<td>St Elizabeth’s Catholic</td>
</tr>
<tr>
<td></td>
<td>All Saints’ CE</td>
</tr>
<tr>
<td></td>
<td>Frederick Bird</td>
</tr>
<tr>
<td></td>
<td>Gosford Park</td>
</tr>
<tr>
<td></td>
<td>Stoke</td>
</tr>
<tr>
<td></td>
<td>Stoke Heath</td>
</tr>
<tr>
<td></td>
<td>Sacred Heart Catholic</td>
</tr>
<tr>
<td></td>
<td>St Mary &amp; St Benedict Catholic</td>
</tr>
<tr>
<td></td>
<td>Sidney Stringer Academy</td>
</tr>
<tr>
<td></td>
<td>Southfields</td>
</tr>
<tr>
<td>West Central</td>
<td>All Souls’ Catholic</td>
</tr>
<tr>
<td></td>
<td>Earlsdon</td>
</tr>
<tr>
<td></td>
<td>Hearsall Academy</td>
</tr>
<tr>
<td></td>
<td>Moseley</td>
</tr>
<tr>
<td></td>
<td>St Osburg’s Catholic</td>
</tr>
<tr>
<td></td>
<td>Spon Gate</td>
</tr>
<tr>
<td>Longford</td>
<td>Alderman’s Green</td>
</tr>
<tr>
<td></td>
<td>Courthouse Green Academy</td>
</tr>
<tr>
<td></td>
<td>Grangehurst</td>
</tr>
<tr>
<td></td>
<td>Good Shepherd Catholic Academy</td>
</tr>
<tr>
<td></td>
<td>Holbrook</td>
</tr>
<tr>
<td></td>
<td>Little Heath</td>
</tr>
<tr>
<td></td>
<td>Longford Park</td>
</tr>
<tr>
<td></td>
<td>St Laurence’s CE Academy</td>
</tr>
<tr>
<td>North East</td>
<td>Henley Green</td>
</tr>
<tr>
<td></td>
<td>Moat House</td>
</tr>
<tr>
<td></td>
<td>Potters Green</td>
</tr>
<tr>
<td></td>
<td>SEVA (Free)</td>
</tr>
<tr>
<td></td>
<td>Whittle</td>
</tr>
<tr>
<td></td>
<td>SS Peter &amp; Paul Catholic</td>
</tr>
<tr>
<td></td>
<td>Walsgrave</td>
</tr>
<tr>
<td></td>
<td>St Patricks Catholic</td>
</tr>
<tr>
<td>East</td>
<td>Wyken Croft</td>
</tr>
<tr>
<td></td>
<td>John Fisher Catholic</td>
</tr>
<tr>
<td></td>
<td>Clifford Bridge</td>
</tr>
<tr>
<td></td>
<td>Pearl Hyde</td>
</tr>
<tr>
<td></td>
<td>Ravensdale</td>
</tr>
<tr>
<td></td>
<td>Richard Lee</td>
</tr>
<tr>
<td>Location</td>
<td>Schools</td>
</tr>
<tr>
<td>---------------</td>
<td>----------------------------------------------</td>
</tr>
<tr>
<td>Binley</td>
<td>St Gregory’s Catholic</td>
</tr>
<tr>
<td></td>
<td>Aldermoor Farm</td>
</tr>
<tr>
<td></td>
<td>Ernesford Grange</td>
</tr>
<tr>
<td></td>
<td>St Bartholomew’s</td>
</tr>
<tr>
<td></td>
<td>Sowe Valley</td>
</tr>
<tr>
<td></td>
<td>Corpus Christi</td>
</tr>
<tr>
<td>South East</td>
<td>St Anne’s Catholic</td>
</tr>
<tr>
<td></td>
<td>Stretton CE</td>
</tr>
<tr>
<td></td>
<td>Whitley Abbey</td>
</tr>
<tr>
<td></td>
<td>Willenhall</td>
</tr>
<tr>
<td>South</td>
<td>Finham</td>
</tr>
<tr>
<td></td>
<td>Grange Farm</td>
</tr>
<tr>
<td></td>
<td>Howes</td>
</tr>
<tr>
<td></td>
<td>Manor Park</td>
</tr>
<tr>
<td></td>
<td>St Thomas More Catholic</td>
</tr>
<tr>
<td></td>
<td>Stivichall</td>
</tr>
<tr>
<td></td>
<td>Cannon Park</td>
</tr>
<tr>
<td>Tile Hill</td>
<td>Templars</td>
</tr>
<tr>
<td></td>
<td>Our Lady of the Assumption Catholic</td>
</tr>
<tr>
<td></td>
<td>Leigh</td>
</tr>
<tr>
<td></td>
<td>Charter</td>
</tr>
<tr>
<td>West</td>
<td>Eastern Green Junior</td>
</tr>
<tr>
<td></td>
<td>Limbrick Wood</td>
</tr>
<tr>
<td></td>
<td>Mount Nod</td>
</tr>
<tr>
<td></td>
<td>Park Hill</td>
</tr>
<tr>
<td></td>
<td>St Andrew’s Infant</td>
</tr>
<tr>
<td></td>
<td>St John Vianney</td>
</tr>
<tr>
<td>North West</td>
<td>Allesley</td>
</tr>
<tr>
<td></td>
<td>Allesley Hall</td>
</tr>
<tr>
<td></td>
<td>St Christopher</td>
</tr>
<tr>
<td></td>
<td>St John CE</td>
</tr>
<tr>
<td></td>
<td>Whoberley Hall</td>
</tr>
<tr>
<td>Coundon</td>
<td>Christ the King</td>
</tr>
<tr>
<td></td>
<td>Coundon</td>
</tr>
<tr>
<td></td>
<td>Hollyfast</td>
</tr>
</tbody>
</table>

**Appendix 2 – Secondary Planning Areas**
Secondary Planning Areas

<table>
<thead>
<tr>
<th>Centre</th>
<th>Schools</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Barr's Hill</td>
</tr>
<tr>
<td></td>
<td>Eden Girls</td>
</tr>
<tr>
<td></td>
<td>Sydney Stringer</td>
</tr>
<tr>
<td>North East</td>
<td>Seva</td>
</tr>
<tr>
<td></td>
<td>Grace Academy</td>
</tr>
<tr>
<td></td>
<td>Cardinal Wiseman</td>
</tr>
<tr>
<td>North West</td>
<td>President Kennedy</td>
</tr>
<tr>
<td></td>
<td>Cardinal Newman</td>
</tr>
<tr>
<td></td>
<td>Coundon Court</td>
</tr>
</tbody>
</table>

Page 46 of 57
### Appendix 3 – Primary Forecasts

<table>
<thead>
<tr>
<th>Primary Planning Area</th>
<th>Year</th>
<th>Reception Forecasts</th>
<th>PAN</th>
<th>Available Capacity</th>
<th>Total NOR Forecasts</th>
<th>Overall Capacity</th>
<th>Available Capacity</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>South West</strong></td>
<td>2019/20</td>
<td>308</td>
<td>315</td>
<td>2%</td>
<td>2173</td>
<td>2205</td>
<td>1%</td>
</tr>
<tr>
<td></td>
<td>2020/21</td>
<td>336</td>
<td>315</td>
<td>-7%</td>
<td>2266</td>
<td>2205</td>
<td>-3%</td>
</tr>
<tr>
<td></td>
<td>2021/22</td>
<td>300</td>
<td>315</td>
<td>5%</td>
<td>2307</td>
<td>2205</td>
<td>-5%</td>
</tr>
<tr>
<td></td>
<td>2022/23</td>
<td>295</td>
<td>315</td>
<td>6%</td>
<td>2307</td>
<td>2205</td>
<td>-5%</td>
</tr>
<tr>
<td></td>
<td>2023/24</td>
<td>288</td>
<td>315</td>
<td>8%</td>
<td>2122</td>
<td>2205</td>
<td>4%</td>
</tr>
<tr>
<td><strong>South East</strong></td>
<td>2019/20</td>
<td>497</td>
<td>570</td>
<td>13%</td>
<td>3663</td>
<td>3930</td>
<td>7%</td>
</tr>
<tr>
<td></td>
<td>2020/21</td>
<td>466</td>
<td>570</td>
<td>18%</td>
<td>3625</td>
<td>3960</td>
<td>8%</td>
</tr>
<tr>
<td></td>
<td>2021/22</td>
<td>460</td>
<td>570</td>
<td>19%</td>
<td>3558</td>
<td>3990</td>
<td>11%</td>
</tr>
<tr>
<td></td>
<td>2022/23</td>
<td>459</td>
<td>570</td>
<td>20%</td>
<td>3487</td>
<td>3990</td>
<td>13%</td>
</tr>
<tr>
<td></td>
<td>2023/24</td>
<td>449</td>
<td>570</td>
<td>21%</td>
<td>3390</td>
<td>3990</td>
<td>15%</td>
</tr>
<tr>
<td><strong>South</strong></td>
<td>2019/20</td>
<td>482</td>
<td>555</td>
<td>13%</td>
<td>3553</td>
<td>3765</td>
<td>6%</td>
</tr>
<tr>
<td></td>
<td>2020/21</td>
<td>481</td>
<td>555</td>
<td>13%</td>
<td>3546</td>
<td>3825</td>
<td>7%</td>
</tr>
<tr>
<td></td>
<td>2021/22</td>
<td>448</td>
<td>555</td>
<td>19%</td>
<td>3507</td>
<td>3885</td>
<td>10%</td>
</tr>
<tr>
<td></td>
<td>2022/23</td>
<td>436</td>
<td>555</td>
<td>21%</td>
<td>3407</td>
<td>3885</td>
<td>12%</td>
</tr>
<tr>
<td></td>
<td>2023/24</td>
<td>443</td>
<td>555</td>
<td>20%</td>
<td>3324</td>
<td>3885</td>
<td>14%</td>
</tr>
<tr>
<td><strong>East</strong></td>
<td>2019/20</td>
<td>266</td>
<td>300</td>
<td>11%</td>
<td>1905</td>
<td>2040</td>
<td>7%</td>
</tr>
<tr>
<td></td>
<td>2020/21</td>
<td>259</td>
<td>270</td>
<td>4%</td>
<td>1893</td>
<td>2010</td>
<td>6%</td>
</tr>
<tr>
<td></td>
<td>2021/22</td>
<td>261</td>
<td>270</td>
<td>3%</td>
<td>1900</td>
<td>1980</td>
<td>4%</td>
</tr>
<tr>
<td></td>
<td>2022/23</td>
<td>234</td>
<td>270</td>
<td>13%</td>
<td>1857</td>
<td>1950</td>
<td>5%</td>
</tr>
<tr>
<td></td>
<td>2023/24</td>
<td>289</td>
<td>270</td>
<td>-7%</td>
<td>1872</td>
<td>1920</td>
<td>2%</td>
</tr>
<tr>
<td><strong>West</strong></td>
<td>2019/20</td>
<td>436</td>
<td>480</td>
<td>9%</td>
<td>3289</td>
<td>3480</td>
<td>5%</td>
</tr>
<tr>
<td></td>
<td>2020/21</td>
<td>475</td>
<td>480</td>
<td>1%</td>
<td>3303</td>
<td>3450</td>
<td>4%</td>
</tr>
<tr>
<td></td>
<td>2021/22</td>
<td>449</td>
<td>480</td>
<td>7%</td>
<td>3282</td>
<td>3420</td>
<td>4%</td>
</tr>
<tr>
<td><strong>Longford</strong></td>
<td>2019/20</td>
<td>436</td>
<td>480</td>
<td>9%</td>
<td>3289</td>
<td>3480</td>
<td>5%</td>
</tr>
<tr>
<td></td>
<td>2020/21</td>
<td>475</td>
<td>480</td>
<td>1%</td>
<td>3303</td>
<td>3450</td>
<td>4%</td>
</tr>
<tr>
<td></td>
<td>2021/22</td>
<td>449</td>
<td>480</td>
<td>7%</td>
<td>3282</td>
<td>3420</td>
<td>4%</td>
</tr>
<tr>
<td>--------------</td>
<td>---------</td>
<td>---------</td>
<td>---------</td>
<td>---------</td>
<td>---------</td>
<td>---------</td>
<td>---------</td>
</tr>
<tr>
<td><strong>North East</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>2022/23</strong></td>
<td>458</td>
<td>480</td>
<td>5%</td>
<td>3273</td>
<td>3390</td>
<td>3%</td>
<td></td>
</tr>
<tr>
<td><strong>2023/24</strong></td>
<td>441</td>
<td>480</td>
<td>8%</td>
<td>3212</td>
<td>3350</td>
<td>4%</td>
<td></td>
</tr>
<tr>
<td><strong>2019/20</strong></td>
<td>321</td>
<td>395</td>
<td>19%</td>
<td>2466</td>
<td>2835</td>
<td>13%</td>
<td></td>
</tr>
<tr>
<td><strong>2020/21</strong></td>
<td>338</td>
<td>395</td>
<td>14%</td>
<td>2477</td>
<td>2835</td>
<td>13%</td>
<td></td>
</tr>
<tr>
<td><strong>2021/22</strong></td>
<td>327</td>
<td>395</td>
<td>17%</td>
<td>2463</td>
<td>2835</td>
<td>13%</td>
<td></td>
</tr>
<tr>
<td><strong>2022/23</strong></td>
<td>310</td>
<td>395</td>
<td>22%</td>
<td>2431</td>
<td>2835</td>
<td>14%</td>
<td></td>
</tr>
<tr>
<td><strong>2023/24</strong></td>
<td>297</td>
<td>395</td>
<td>25%</td>
<td>2370</td>
<td>2835</td>
<td>16%</td>
<td></td>
</tr>
<tr>
<td><strong>East</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>2019/20</strong></td>
<td>409</td>
<td>425</td>
<td>4%</td>
<td>2962</td>
<td>3045</td>
<td>3%</td>
<td></td>
</tr>
<tr>
<td><strong>2020/21</strong></td>
<td>428</td>
<td>425</td>
<td>-1%</td>
<td>2996</td>
<td>3075</td>
<td>3%</td>
<td></td>
</tr>
<tr>
<td><strong>2021/22</strong></td>
<td>398</td>
<td>425</td>
<td>6%</td>
<td>2964</td>
<td>3075</td>
<td>4%</td>
<td></td>
</tr>
<tr>
<td><strong>2022/23</strong></td>
<td>405</td>
<td>425</td>
<td>5%</td>
<td>2933</td>
<td>3075</td>
<td>5%</td>
<td></td>
</tr>
<tr>
<td><strong>2023/24</strong></td>
<td>385</td>
<td>425</td>
<td>9%</td>
<td>2867</td>
<td>3045</td>
<td>6%</td>
<td></td>
</tr>
<tr>
<td><strong>Binley</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>2019/20</strong></td>
<td>246</td>
<td>270</td>
<td>9%</td>
<td>1715</td>
<td>1830</td>
<td>6%</td>
<td></td>
</tr>
<tr>
<td><strong>2020/21</strong></td>
<td>234</td>
<td>270</td>
<td>13%</td>
<td>1714</td>
<td>1875</td>
<td>9%</td>
<td></td>
</tr>
<tr>
<td><strong>2021/22</strong></td>
<td>222</td>
<td>270</td>
<td>18%</td>
<td>1671</td>
<td>1860</td>
<td>10%</td>
<td></td>
</tr>
<tr>
<td><strong>2022/23</strong></td>
<td>247</td>
<td>270</td>
<td>8%</td>
<td>1695</td>
<td>1890</td>
<td>10%</td>
<td></td>
</tr>
<tr>
<td><strong>2023/24</strong></td>
<td>217</td>
<td>270</td>
<td>20%</td>
<td>1665</td>
<td>1890</td>
<td>12%</td>
<td></td>
</tr>
<tr>
<td><strong>South East</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>2019/20</strong></td>
<td>171</td>
<td>180</td>
<td>5%</td>
<td>1161</td>
<td>1230</td>
<td>6%</td>
<td></td>
</tr>
<tr>
<td><strong>2020/21</strong></td>
<td>159</td>
<td>180</td>
<td>12%</td>
<td>1176</td>
<td>1260</td>
<td>7%</td>
<td></td>
</tr>
<tr>
<td><strong>2021/22</strong></td>
<td>173</td>
<td>180</td>
<td>4%</td>
<td>1187</td>
<td>1260</td>
<td>6%</td>
<td></td>
</tr>
<tr>
<td><strong>2022/23</strong></td>
<td>168</td>
<td>180</td>
<td>7%</td>
<td>1187</td>
<td>1260</td>
<td>6%</td>
<td></td>
</tr>
<tr>
<td><strong>2023/24</strong></td>
<td>154</td>
<td>180</td>
<td>15%</td>
<td>1170</td>
<td>1260</td>
<td>7%</td>
<td></td>
</tr>
<tr>
<td><strong>South</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>2019/20</strong></td>
<td>357</td>
<td>405</td>
<td>12%</td>
<td>2696</td>
<td>2835</td>
<td>5%</td>
<td></td>
</tr>
<tr>
<td><strong>2020/21</strong></td>
<td>394</td>
<td>405</td>
<td>3%</td>
<td>2702</td>
<td>2835</td>
<td>5%</td>
<td></td>
</tr>
<tr>
<td><strong>2021/22</strong></td>
<td>383</td>
<td>405</td>
<td>5%</td>
<td>2677</td>
<td>2835</td>
<td>6%</td>
<td></td>
</tr>
<tr>
<td><strong>2022/23</strong></td>
<td>365</td>
<td>405</td>
<td>10%</td>
<td>2642</td>
<td>2835</td>
<td>7%</td>
<td></td>
</tr>
<tr>
<td><strong>2023/24</strong></td>
<td>329</td>
<td>405</td>
<td>19%</td>
<td>2580</td>
<td>2835</td>
<td>9%</td>
<td></td>
</tr>
<tr>
<td><strong>Tile Hill</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>2019/20</strong></td>
<td>174</td>
<td>195</td>
<td>11%</td>
<td>1233</td>
<td>1320</td>
<td>7%</td>
<td></td>
</tr>
<tr>
<td><strong>2020/21</strong></td>
<td>187</td>
<td>195</td>
<td>4%</td>
<td>1266</td>
<td>1335</td>
<td>5%</td>
<td></td>
</tr>
<tr>
<td><strong>2021/22</strong></td>
<td>171</td>
<td>195</td>
<td>12%</td>
<td>1293</td>
<td>1350</td>
<td>4%</td>
<td></td>
</tr>
<tr>
<td><strong>2022/23</strong></td>
<td>151</td>
<td>195</td>
<td>22%</td>
<td>1264</td>
<td>1365</td>
<td>7%</td>
<td></td>
</tr>
<tr>
<td><strong>2023/24</strong></td>
<td>156</td>
<td>195</td>
<td>20%</td>
<td>1245</td>
<td>1365</td>
<td>9%</td>
<td></td>
</tr>
<tr>
<td><strong>West</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>2019/20</strong></td>
<td>227</td>
<td>225</td>
<td>-1%</td>
<td>1483</td>
<td>1560</td>
<td>5%</td>
<td></td>
</tr>
<tr>
<td><strong>2020/21</strong></td>
<td>237</td>
<td>225</td>
<td>-5%</td>
<td>1576</td>
<td>1575</td>
<td>0%</td>
<td></td>
</tr>
<tr>
<td><strong>2021/22</strong></td>
<td>235</td>
<td>225</td>
<td>-5%</td>
<td>1641</td>
<td>1575</td>
<td>-4%</td>
<td></td>
</tr>
<tr>
<td><strong>2022/23</strong></td>
<td>238</td>
<td>225</td>
<td>-6%</td>
<td>1661</td>
<td>1575</td>
<td>-5%</td>
<td></td>
</tr>
<tr>
<td><strong>2023/24</strong></td>
<td>209</td>
<td>225</td>
<td>7%</td>
<td>1541</td>
<td>1575</td>
<td>2%</td>
<td></td>
</tr>
<tr>
<td><strong>North West</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>2019/20</strong></td>
<td>199</td>
<td>210</td>
<td>5%</td>
<td>1407</td>
<td>1470</td>
<td>4%</td>
<td></td>
</tr>
<tr>
<td><strong>2020/21</strong></td>
<td>206</td>
<td>210</td>
<td>2%</td>
<td>1423</td>
<td>1470</td>
<td>3%</td>
<td></td>
</tr>
<tr>
<td><strong>2021/22</strong></td>
<td>198</td>
<td>210</td>
<td>6%</td>
<td>1422</td>
<td>1470</td>
<td>3%</td>
<td></td>
</tr>
<tr>
<td><strong>2022/23</strong></td>
<td>182</td>
<td>210</td>
<td>13%</td>
<td>1393</td>
<td>1470</td>
<td>5%</td>
<td></td>
</tr>
<tr>
<td><strong>2023/24</strong></td>
<td>205</td>
<td>210</td>
<td>2%</td>
<td>1388</td>
<td>1470</td>
<td>6%</td>
<td></td>
</tr>
<tr>
<td>Secondary Planning Area</td>
<td>Year</td>
<td>Year 7 Forecast</td>
<td>PAN</td>
<td>Available Capacity</td>
<td>Total NOR Forecasts</td>
<td>Overall Capacity</td>
<td>Available Capacity</td>
</tr>
<tr>
<td>--------------------------</td>
<td>----------</td>
<td>-----------------</td>
<td>------</td>
<td>--------------------</td>
<td>---------------------</td>
<td>-----------------</td>
<td>--------------------</td>
</tr>
<tr>
<td></td>
<td>2019/20</td>
<td>238</td>
<td>240</td>
<td>1%</td>
<td>1542</td>
<td>1590</td>
<td>3%</td>
</tr>
<tr>
<td></td>
<td>2020/21</td>
<td>219</td>
<td>240</td>
<td>9%</td>
<td>1587</td>
<td>1650</td>
<td>4%</td>
</tr>
<tr>
<td></td>
<td>2021/22</td>
<td>212</td>
<td>240</td>
<td>12%</td>
<td>1570</td>
<td>1650</td>
<td>5%</td>
</tr>
<tr>
<td></td>
<td>2022/23</td>
<td>226</td>
<td>240</td>
<td>6%</td>
<td>1567</td>
<td>1650</td>
<td>5%</td>
</tr>
<tr>
<td></td>
<td>2023/24</td>
<td>219</td>
<td>240</td>
<td>9%</td>
<td>1549</td>
<td>1650</td>
<td>6%</td>
</tr>
<tr>
<td>Coundon</td>
<td>2019/20</td>
<td>4330</td>
<td>4765</td>
<td>9%</td>
<td>31249</td>
<td>33135</td>
<td>6%</td>
</tr>
<tr>
<td></td>
<td>2020/21</td>
<td>4421</td>
<td>4735</td>
<td>7%</td>
<td>31549</td>
<td>33360</td>
<td>5%</td>
</tr>
<tr>
<td></td>
<td>2021/22</td>
<td>4236</td>
<td>4735</td>
<td>11%</td>
<td>31441</td>
<td>33390</td>
<td>6%</td>
</tr>
<tr>
<td></td>
<td>2022/23</td>
<td>4174</td>
<td>4735</td>
<td>12%</td>
<td>31103</td>
<td>33375</td>
<td>7%</td>
</tr>
<tr>
<td></td>
<td>2023/24</td>
<td>4082</td>
<td>4735</td>
<td>14%</td>
<td>30294</td>
<td>33275</td>
<td>9%</td>
</tr>
<tr>
<td>City Wide</td>
<td>2019/20</td>
<td>575</td>
<td>491</td>
<td>-17%</td>
<td>2385</td>
<td>2315</td>
<td>-3%</td>
</tr>
<tr>
<td></td>
<td>2020/21</td>
<td>570</td>
<td>491</td>
<td>-16%</td>
<td>2532</td>
<td>2365</td>
<td>-7%</td>
</tr>
<tr>
<td></td>
<td>2021/22</td>
<td>580</td>
<td>510</td>
<td>-14%</td>
<td>2651</td>
<td>2414</td>
<td>-10%</td>
</tr>
<tr>
<td></td>
<td>2022/23</td>
<td>598</td>
<td>510</td>
<td>-17%</td>
<td>2790</td>
<td>2463</td>
<td>-13%</td>
</tr>
<tr>
<td></td>
<td>2023/24</td>
<td>606</td>
<td>510</td>
<td>-19%</td>
<td>2942</td>
<td>2512</td>
<td>-17%</td>
</tr>
<tr>
<td>Central</td>
<td>2019/20</td>
<td>860</td>
<td>895</td>
<td>4%</td>
<td>3976</td>
<td>4008</td>
<td>1%</td>
</tr>
<tr>
<td></td>
<td>2020/21</td>
<td>852</td>
<td>925</td>
<td>8%</td>
<td>4087</td>
<td>4135</td>
<td>1%</td>
</tr>
<tr>
<td></td>
<td>2021/22</td>
<td>918</td>
<td>895</td>
<td>-3%</td>
<td>4223</td>
<td>4255</td>
<td>1%</td>
</tr>
<tr>
<td></td>
<td>2022/23</td>
<td>933</td>
<td>895</td>
<td>-4%</td>
<td>4377</td>
<td>4375</td>
<td>0%</td>
</tr>
<tr>
<td></td>
<td>2023/24</td>
<td>928</td>
<td>895</td>
<td>-4%</td>
<td>4541</td>
<td>4475</td>
<td>-1%</td>
</tr>
<tr>
<td>North West</td>
<td>2019/20</td>
<td>182</td>
<td>185</td>
<td>2%</td>
<td>894</td>
<td>905</td>
<td>1%</td>
</tr>
<tr>
<td></td>
<td>2020/21</td>
<td>179</td>
<td>180</td>
<td>1%</td>
<td>906</td>
<td>905</td>
<td>0%</td>
</tr>
<tr>
<td></td>
<td>2021/22</td>
<td>183</td>
<td>180</td>
<td>-2%</td>
<td>912</td>
<td>905</td>
<td>-1%</td>
</tr>
<tr>
<td></td>
<td>2022/23</td>
<td>183</td>
<td>180</td>
<td>-1%</td>
<td>911</td>
<td>905</td>
<td>-1%</td>
</tr>
<tr>
<td></td>
<td>2023/24</td>
<td>182</td>
<td>180</td>
<td>-1%</td>
<td>914</td>
<td>905</td>
<td>-1%</td>
</tr>
<tr>
<td>Foxford</td>
<td>2019/20</td>
<td>474</td>
<td>420</td>
<td>-13%</td>
<td>2134</td>
<td>2100</td>
<td>-2%</td>
</tr>
<tr>
<td></td>
<td>2020/21</td>
<td>471</td>
<td>420</td>
<td>-12%</td>
<td>2216</td>
<td>2100</td>
<td>-6%</td>
</tr>
<tr>
<td></td>
<td>2021/22</td>
<td>493</td>
<td>450</td>
<td>-10%</td>
<td>2291</td>
<td>2130</td>
<td>-8%</td>
</tr>
<tr>
<td></td>
<td>2022/23</td>
<td>501</td>
<td>450</td>
<td>-11%</td>
<td>2371</td>
<td>3160</td>
<td>25%</td>
</tr>
<tr>
<td></td>
<td>2023/24</td>
<td>495</td>
<td>450</td>
<td>-10%</td>
<td>2436</td>
<td>2190</td>
<td>-11%</td>
</tr>
<tr>
<td>South</td>
<td>2019/20</td>
<td>693</td>
<td>630</td>
<td>-10%</td>
<td>2962</td>
<td>2910</td>
<td>-2%</td>
</tr>
<tr>
<td></td>
<td>2020/21</td>
<td>680</td>
<td>570</td>
<td>-19%</td>
<td>3103</td>
<td>2910</td>
<td>-7%</td>
</tr>
<tr>
<td></td>
<td>2021/22</td>
<td>711</td>
<td>570</td>
<td>-25%</td>
<td>3252</td>
<td>2910</td>
<td>-12%</td>
</tr>
<tr>
<td></td>
<td>2022/23</td>
<td>717</td>
<td>570</td>
<td>-26%</td>
<td>3385</td>
<td>2910</td>
<td>-16%</td>
</tr>
<tr>
<td></td>
<td>2023/24</td>
<td>738</td>
<td>570</td>
<td>-29%</td>
<td>3558</td>
<td>2910</td>
<td>-22%</td>
</tr>
<tr>
<td>East</td>
<td>2019/20</td>
<td>2023/24</td>
<td>219</td>
<td>9%</td>
<td>1549</td>
<td>1650</td>
<td>6%</td>
</tr>
</tbody>
</table>
### Appendix 5 – Bus Route Information

<table>
<thead>
<tr>
<th>School</th>
<th>Bus Routes</th>
</tr>
</thead>
<tbody>
<tr>
<td>Barr’s Hill</td>
<td>All bus routes to Pool Meadow</td>
</tr>
<tr>
<td></td>
<td>16/16a – Binley, Stoke Aldermoor, City centre, Radford, Coundon, Kersley</td>
</tr>
<tr>
<td></td>
<td>13/13a – Willenhall, Binley, City centre, Radford, Coundon, Kersley</td>
</tr>
<tr>
<td>Caludon Castle</td>
<td>4 – Holbrooks, Ricoh arena, Foeshill, City centre, Stoke, Walsgrave</td>
</tr>
<tr>
<td></td>
<td>8 &amp; 8a – City centre, Stoke, Wyken, Walsgrave, Potters Green, Henley Green</td>
</tr>
<tr>
<td></td>
<td>9/9A – Finham, Stivichall, City centre, Stoke, Wyken, Walsgrave</td>
</tr>
<tr>
<td>Coundon Court</td>
<td>5- Tile Hill, Chapelfields, City centre, Coundon, Holbrooks, Little Heath</td>
</tr>
<tr>
<td>School</td>
<td>Bus Routes</td>
</tr>
<tr>
<td>---------------------</td>
<td>-------------------------------------------------</td>
</tr>
<tr>
<td>Eden</td>
<td>All bus routes to Pool Meadow</td>
</tr>
<tr>
<td></td>
<td>6/6a – Tile Hill, Chapelfields, City centre, courthouse green, little heath Bell green</td>
</tr>
<tr>
<td></td>
<td>21 - Willenhall, Whitley, City centre, Courthouse green, bell green</td>
</tr>
<tr>
<td>Ernesford Grange</td>
<td>13 – Willenhall, Binley, City centre, Radford, Coundon, Kersley</td>
</tr>
<tr>
<td></td>
<td>16/16a – Binley, Stoke Alder Moor, City centre, Radford, Coundon, Kersley</td>
</tr>
<tr>
<td>Finham Park</td>
<td>9s/9/9a – Walsgrave, Wyken, stoke, City centre, Stivichall, Finham</td>
</tr>
<tr>
<td>Foxford</td>
<td>6/6A – Tile Hill, Chapelfields, City centre, Courthouse Green, Little Heath, Aldermans Green</td>
</tr>
<tr>
<td></td>
<td>20 – City centre, Foleshill, Little Heath, Longford, Ricoh arena, Exhall, Bedworth</td>
</tr>
<tr>
<td>Lyng Hall</td>
<td>10/10a– Eastern Green, Chapelfields, City centre, Wyken, Bell Green</td>
</tr>
<tr>
<td></td>
<td>60 – Canley, Whitley, Willenhall, Walsgrave, Wyken, Holbrooks</td>
</tr>
<tr>
<td>President Kennedy</td>
<td>13/13a – Willenhall, Binley, City centre, Radford, Coundon, Keresley, Holbrooks, City centre</td>
</tr>
<tr>
<td></td>
<td>772 – Bedworth, Exhall, Longford, Holbrooks, Little heath</td>
</tr>
<tr>
<td>Sidney Stringer</td>
<td>All bus routes to Pool Meadow</td>
</tr>
<tr>
<td>The Westwood Academy</td>
<td>19- Westwood Business Park - Hearsall Common - Coventry City centre</td>
</tr>
<tr>
<td></td>
<td>18 - Tile Hill - Canley - Hearsall Common - Coventry City centre</td>
</tr>
<tr>
<td></td>
<td>18a - Tile Hill, Canley, Stivichall, City centre</td>
</tr>
<tr>
<td></td>
<td>43 – Westwood, Canley, Tile Hill, Allesley</td>
</tr>
<tr>
<td>Whitley Academy</td>
<td>7 – Brownshill Green, Allesley Village, City centre, Whitley</td>
</tr>
<tr>
<td></td>
<td>21 - Willenhall, Whitley, City centre, Courthouse green, bell green</td>
</tr>
</tbody>
</table>
Appendix 6 - Education Pupil Yield Methodology

There are two main factors to the contributions requests, firstly the cost per pupil (Cost Multiplier) which is a Department for Education (DfE) stated amount for Coventry, and secondly the pupil yield anticipated from the development. Coventry City Council request contributions, where required, for Early Years (EY), Primary, Secondary, Sixth Form, and Primary, and Secondary SEN. These requests are in line with changes in Government policy including the funded two year olds EY policy, 30 Hrs as of September 2017, and the raising of the participation age to 18; as well as ensuring Coventry matches its neighbouring local authorities in terms of level of request.

Coventry City Council Education do not ask for contributions for one bedroom dwellings as they are unlikely to generate either primary, secondary or sixth form pupils. For this reason Coventry calculate the pupil yield from dwellings which are designed for familial occupation, I.E. 2 bed dwellings and above. Furthermore, a majority of the one bed dwellings within the city are occupied by and designated for use by students and so familial occupation would not occur.

Education also request a contribution towards the recouping of officer time invested into responding to the planning application. This has been implemented following discussions with other West Midlands Local Authorities, who also request similar contributions. The majority of West Midlands Authorities which request such a contribution have set a 3% on the total request as their officer time figure. Coventry having examined the average amount of officer time spent on requests, that a fairer figure would be 2%. Therefore, Education will request a contribution of 2% in additional to the Education contribution for increasing pupil places.

Cost Multiplier
There is no nationwide funding formula for Early Years provision, however there is guidance based on the amount of floor space that an Early Years child will need, based on age of the child. Providers must meet the following indoor space requirements:

- Children under two years: 3.5 m² per child
- Two year olds: 2.5 m² per child
- Children aged three to five years: 2.3 m² per child

The variation in EY provision, between AM and PM sessions, and the high turnover of providers mean that this can often be a variable that changes on a monthly basis. For this reason the same cost multiplier as primary aged pupils is used.

The Department for Education (DfE) provide an annual update to this figure and for 2017/18 this figure is £12,722. The Secondary calculation has been updated by the DfE to a figure of £16,539. These new figures have been confirmed by the DfE and are expected to rise in the future in line with inflation. Therefore, the cost per pupil multiplier will be updated as and when the DfE provide the new allocation allowance for Coventry.

The DfE do not provide costs per pupil place for Sixth form pupils. Therefore the methodology for this, takes the Secondary calculation and adds the additional floor space required for a sixth form pupil. The additional floor space required for a sixth form pupil over a secondary age pupil is a recognised DfE statistic. The basis behind these floor space calculations is the extra equipment and supervision that sixth form pupils require over secondary age pupils. The DfE state the additional floor space required be larger than that for Secondary, working this out as a percentage sixth form pupils require 14.6% more space than Secondary. Therefore, 14.6% has been added to the cost multiplier for Secondary to give a total for a single sixth form of £18,953.

For SEN, as there is no DfE multiplier, Coventry use the benchmarking mechanism undertaken by the DfE in 2019, which recommends that ‘Special schools require more space per pupil than mainstream schools, and this should be reflected in the assumed costs of provision. We recommend that developer contributions for special or alternative school places are set at four times the cost of mainstream places, consistent with the space standards in Building Bulletin 104. You can also refer to the National School Delivery Cost Benchmarking report for the costs of delivering SEN school places.’ The DfE recommend for a cost of £65,739 average cost per pupil place for SEN, Coventry’s cost per pupil multiplier has been updated to match this figure.

Pupil Yield Changes

Early Years

The take up rate for Coventry for the 30hrs was circa 50% and the take-up rate for funded two years old is circa 32%. These two programmes have effectively doubled the amount of Early Years care required. The impact of the new universal credit benefit system, and the lowering of the benefit cap, will also increase the eligibility of funded two year old places and therefore the amount of places required will increase. Coventry City Council are currently working to calculate
the effect of this. Therefore, the contribution request is calculated from asking for two years’ worth 15 Hrs or 0.8 of a FT year group with the take up rate of funded two years and 30 Hrs being added into this. This will be co-ordinated each year with Early Years colleagues as the take up rate for both Government schemes is expected to rise.

**Primary and Secondary**

Coventry City Council has seen a primary age population explosion in recent years with the current reception cohort being 24% higher than the current Year 11. This has been as a result of larger birth cohorts which have impacted upon available school places. These larger birth cohorts are coming from existing housing stock as well as new homes being put into the city. There has been relatively little new housing in Coventry over this period, but the city as a whole has become more attractive for people to raise families in, resulting in a younger population within the city. This trend is expected to continue in the new housing that is being put into the city. In essence more people within Coventry are having more children. The formula for this is by examining the total number of eligible homes within Coventry and the current Number on Roll in Schools, split between Primary and Secondary. This gives the pupil yield for how many school age children the current housing stock within Coventry provide. The pupil yield from a single eligible dwelling for primary is 0.39 and for secondary 0.22 pupils per eligible household.

**Sixth Form**

The formula for this is calculated from the proportion of children staying on in sixth form and also staying in education between Years 12 and 13. However it is still an inconsistent indicator, therefore the percentage applied to the children staying on rate will be based on the stay on rate of children the September before the application was received. For the most recent year, the drop off between year 12 and year 13 was 8.9% of the cohort, therefore to incorporate this into the pupil yield only 1.9 year groups are requested. This has resulted in a drop in the sixth form contribution asked for.

**Primary SEN**

To calculate the primary SEN contribution Coventry City Council use the School census published three times annually. This lists the student details for the current mainstream and BSSS cohort and the amount of children within this cohort an EHC plan or SEN statement. By understanding the total number of EHC plans and SEN statements within the current primary cohort, it is possible to calculate the current % of the cohort which require additional needs arising from new housing. By dividing the figures of total cohort by number of EHC’s a total of 1.67% is received. This factor will be applied to the pupil yield calculation for primary. This figure will be updated annually as the number of EHC plans is rising in excess of proportionality of the general increase in population.
Secondary SEN

The Secondary SEN pupil yield is calculated using the same method of calculating the current number of secondary age pupils with an EHC plan or Statement and dividing by the total amount of children in Secondary education. The current amount of EHC plans within Secondary school is 3.3%. This figure will be updated annually as the number of EHC plans is rising in excess of proportionality of the general increase in population.

Appendix 7 – Forecasting Methodology and Planning Considerations

Introduction

Local authorities use different methods to forecast pupil numbers and take different factors into account, the forecast of pupil numbers are submitted to the ESFA annually and a basic need allocation is granted based off the information provided. The methodology explains the process by which the pupil forecasts are made, the following process is followed.

Reception

To calculate the Reception intake for each forecast year, birth data is gathered annually from the NHS Trust that covers Coventry. This is then aggregated annually with the most recent GP data, and broken down into each individual school’s catchment area, using GIS software. This provides basic, raw, forecasts for the following 4 years. For forecasts beyond this point a three-year weighted average for each catchment area is used, to plot the trends and determine long term sufficiency planning.

To calculate how this cohort is reflected onto a school level, the variable of parental choice is applied. This is calculated by the percentage of each catchment area attending all schools in the city. As an example, if there are 100 children born in catchment area and 50% attend that school then the school will be forecast to have 50 pupils, if in the same catchment area 25% attend the next closest school then that school will be forecast to have 25 pupils. This process is then undertaken for every catchment area in the city. Where any school has an excess above its PAN, unless it is agreed that the school can take above PAN, then that excess will be redistributed to other schools within the planning area.16 The redistribution is added, in liaising with admissions, by filling the most ‘popular’ school in planning area and then moving onto the second ‘most popular’.

16 This One Strategic Plan contains maps of the planning areas and which schools lie within them.
Any other mitigating factors, such as Out of City (OOC) children entering the school are then added for the September intake. Individual rates of increase are applied to schools as this is more of a factor for schools near the city boundaries or schools which have more cross border accessible admission arrangements. Those rates are based on recent trends of OOC in the school. These are manually added after the Coventry applications are factored in to account for the effective pushback of some of these children.

This provides a September intake figure for every mainstream school.

In-Year

Once the September intake is calculated In-Year variations are applied, there are two forms of In-Year. In-Year calculations are currently based from migration rates and the impact of additional housing across the City. The Coventry City Council Admissions Service monitor In-Year movements both into the city and within the city. Data is indicating significant movements between schools with no house move and in some areas such as Radford and Foleshill significant movement into the city. All these factors need to be taken into account when planning in particular areas.

- Migration is added for each school year group in each school based off historic transience and movement – this is often internal migration.
- The City Council maintains a database of housing developments with their likely pupil yields, which are calculated using formulae that are based off city wide pupil yields. In some cases, assumptions are made as to the rate the houses will be built and occupied unless the application is reproduced in either the Local Plan or the Annual Housing Monitor.

Secondary

The same formula, for primary, is placed in effect for Secondary. The Year 6 cohort is calculated based on census information on the existing school cohort and rolled forward 1 year factoring in the transfer round loss of pupils, c.5% of total cohort size, as children choose to attend other LA schools and private education, this figure is dependent yearly upon the amount of places available in other LA schools. Through partnership working with other local authorities, the competition for space in other LA schools can be factored in as to how many spaces might be available for Coventry pupils.

Sixth Form
For Sixth form the school’s intake figures for Year 12 + 13 are generated from actual school values by using the previous year’s transfer of Year 11 to Post-16 is then placed within the context of the projected Year 11 cohort for the forecast years. This transfer round takes into account the pupils transferring to other phases of education, such as apprenticeship, or FE colleges, which the LA do not forecast for. Therefore, only the pupils anticipated to enter a School sixth form are included in the forecasts.

Additional Detail

It should be stressed that the projections are only indicative. For instance, where the projection for the city is in excess of total amount of places available and an individual school forecast exceeds the capacity of that school, therefore no redistribution can occur as there are insufficient city wide school places, the projections do not imply that the school will be required to admit the additional pupils.
Dear Directors of Childrens Services,

30 May 2018

On 29 May, the department announced basic need allocations for school places to be delivered for September 2021. This funding has been provided in order to support you to meet your statutory duty to deliver sufficient schools places, as set out in section 14 of the Education Act 1996. We expect that, in doing so, you will make every effort to spend this capital funding efficiently; safeguard the quality of places in the system; and manage down spare capacity in the estate where it exists. We know there is some excellent practice across local authorities on all of these fronts, and want to support you to learn from one another and improve where needed.

If you would like any additional support or wish to discuss any of the areas outlined in this letter, please do raise with your lead contact in the ESFA Pupil Place Planning team at Advisers.PPP@education.gov.uk.

Efficient use of capital funding

As part of fulfilling your duty to provide sufficient places, it is right that we look to you to deliver capital projects efficiently and effectively. There are many examples of effective delivery, but the latest SCAP Capital Spend data for 2016/17 shows considerable variation, based on the cost per place metrics in the School Places Scorecards. Even after excluding the least and most expensive groups, the cost of delivering a primary school place varies from £4,900 to £19,600. The 2017 NAO Report on Capital Funding for Schools commented that variation in cost might indicate that some local authorities are not choosing to create new school places in the most cost-effective ways or are not implementing their chosen approaches efficiently. The latest School Places Scorecards are available on GOV.UK and the Education Building Development Officers latest National Schools Delivery Cost Benchmarking Report is here.

The government has begun a programme of work to support local authorities, academy trusts and other responsible bodies to secure sufficient capability and capacity to manage their estates effectively. Mike Green, then Director of Capital at ESFA, issued advice to Directors of Children’s Services in September 2016 on benchmarking, specification, delivery strategy and procurement routes. Good Estate Management for Schools was published in April 2018 to provide a one-stop-shop for everything that responsible bodies need to know about managing their estates.

---

1 Based on looking at the 80th and 20th centiles, having controlled for inflation and regional price differences and excluding refurbishments.
We are also collecting and analysing data from local authorities and academy trusts to improve how we monitor whether capital grants are being used efficiently, to benchmark performance, and to help share best practice. We visited a number of local authorities in 2017 and engaged in discussions to identify drivers of efficiency and inefficiency in the delivery of school places. We are now working closely with the sector to support high cost local authorities to increase value for money. In 2018/19, we will extend our work to look at efficiency in the management of the existing estate by both academy trusts and local authorities.

We are working closely with the Education Building Officers Development Group to find new ways to share good practice and support local authorities to deliver school places more efficiently and effectively. The programme will help local authorities make the most of their Basic Need allocations, making sufficiency spend as efficient as possible and potentially freeing up local authority capital funds to benefit the community more widely, for example improving the condition of existing schools.

In order to support this drive for capital efficiency, we will in future be applying three conditions of grant to basic need funding. These conditions will apply from the 2019-20 allocations onwards and will be set out in an annual grant letter alongside the first instalment next spring. We wanted to provide you with advance notice of these conditions.

Under the first, the department or the ESFA may require local authorities to provide such information as we reasonably request relating to expenditure related to providing school places, so that we can understand cost drivers and measure efficiency. Under the second, the department or the ESFA may require local authorities to produce an action plan to improve the efficiency of capital spend on new school places, where they have been identified for engagement based on their spend data and are not able to demonstrate that higher costs are justified (e.g. due to constraints or external factors beyond their control). The third condition will provide a backstop sanction, which the department or ESFA would only consider using in circumstances where we are unable to agree an action plan with a local authority; or where we consider that authority to not be carrying out its action plan effectively. In such instances, the department may withhold basic need funding for a specified number of places and instead directly deliver construction of those places centrally.

For clarity, we will never claw back any allocations already distributed; and the basic need grant remains un-ringfenced, providing you with the flexibility to manage your capital programmes in the way you deem fit. These conditions will only ever be enforced in the rare cases that the department cannot constructively agree a course of action with a particular local authority that is designed to drive efficient spending.

Quality of places

One of the department’s key ambitions – which I know you will share – is to ensure that every pupil has access to a high quality school place. We therefore expect you to create new places in schools or academies that have an overall Ofsted rating of ‘good’ or ‘outstanding,’ and to consider a range of performance
indicators and financial data before deciding which school to expand. We do not expect you to expand a school or academy that is underperforming, unless there is a very strong rationale to do so – and if the school or academy is eligible for intervention, you should discuss this with the relevant Regional Schools Commissioner first. If you believe there is no other feasible way to create new places in your area – other than by expanding an underperforming school – you should contact your local ESFA Pupil Place Planning Adviser as soon as possible, who can support you to consider the available options. If you have challenges in persuading good or outstanding academies to expand, please do also discuss these with your Pupil Place Planning Adviser.

**Spare capacity**

The School Capacity Survey (SCAP) 2017 data shows that, whilst there are areas of the country with demand for new places, there are also a significant number of unfilled places in the system. We know that local authorities expect to fill many of these places over the coming years – particularly in the secondary phase, where you have been preparing for the primary population bulge to move up through the system. Where places are not needed to meet forecast demand, however, we would expect you to take action. Whilst it is prudent to retain some spare capacity, in order to manage shifting demand and provide for parental choice, we do not expect local areas to be carrying excessive levels of spare capacity.

As part of fulfilling your sufficiency duty, you will want to manage the local school estate efficiently and reduce or find alternative uses for high levels of spare capacity, in order to avoid detriment to the educational offer or financial position of schools in the area. As part of this, we would expect you to consider a spectrum of options for the reutilisation of space, including for example increasing the provision of early education and childcare, and options for reconfiguration, including via remodelling, amalgamations, mergers and closures where this is the best course of action. Of course, the costs and benefits of keeping and removing spare capacity are very sensitive to local factors. All of these factors should be carefully weighed up, along with considerations of the quality and diversity of provision, to determine the most appropriate approach for your area.

In 2018, we will be working with a small number of local authorities that have both low levels of performance across their schools and high expected rates of spare capacity over the medium-term horizon. Our work with these particular local authorities will be focused on supporting them to make the most efficient use of their estate. Any planned changes will be locally-led and developed through constructive dialogue with relevant bodies in the area.
This page is intentionally left blank
I am writing to you to highlight the Department for Education’s support to local authorities to ensure effective delivery of school capital projects; and – in light of the Spending Round announcement on 4 September – provide an update on the next Basic Need allocation.

Basic Need Allocations

As you will be aware, the Chancellor last week confirmed details of the Spending Round. The Spending Round focused on day-to-day departmental resource budgets for 2020-21 (as well as a 3-year settlement for core schools’ resource funding as an exception). It did not consider departmental capital budgets, as these have already been set for 2020-21. A full multi-year spending review will follow in 2020.

One practical consequence for local authorities is that the DfE will not therefore be able to announce Basic Need allocations in 2019 for places needed in 2022. As you know, we have historically tried to announce basic need allocations 3.5 years ahead of when places are needed, and therefore recognise that this delay may have some implications for the way that local authorities plan and deliver basic need projects.

We are continuing to review local authorities’ recently submitted SCAP 19 data, and expect this data to inform the next set of Basic Need allocations.

Delivering School Capital Projects Efficiently

We are working with the Education Building and Design Officer Group (EBDOG) to encourage greater collaboration between local authorities to drive down school delivery costs and improve efficiency and effectiveness. This includes encouraging local authorities to take advantage of the rates offered through our Framework.
Becoming more efficient, will free up local authority funding to invest elsewhere, for example on improvements to existing school buildings. This could help reduce school expenditure on maintenance, for example.

**School Place Scorecards**

The department published the latest local authority School Place Scorecards on 27th June. These are a key monitoring and transparency tool for the performance of local authorities in providing sufficient school places, their accuracy in forecasting demand, the quality of the schools where those places are being added, and the cost per place of projects. If you have not already, I hope that you will take the opportunity to study your authority’s performance compared to the rates that some of your peers are already achieving and those that could be achieved through DfE Frameworks.

**Peer support and guidance on efficiency**

The Scorecards include a link to offers we have been working on with EBDOG: a peer support initiative and a joint guidance note on making efficient use of capital funding in education. I would like to congratulate those local authorities that are delivering cost effectively and in particular to thank those which have agreed to offer advice to others. I would encourage higher cost local authorities to take advantage of the guidance and support on offer, including on procurement.

**DfE traditional and offsite construction frameworks**

The National School Delivery Cost Benchmarking Study published by EBDOG in June 2019 highlighted that between 2012 – 2018, primary schools procured through the DfE frameworks were delivered 15 – 30% cheaper than local authority self-procured schools. The 2019 report further highlights that DfE derives such efficiencies through standardisation of design and purchasing at scale.

The 2017 DfE (traditional) construction framework was procured to include use by local authorities, for the development of school infrastructure as well as other educational facilities. To date, a number of local authorities – Kent, Essex, Oxfordshire, Central Bedfordshire – are using this framework to deliver their school projects. Other local authorities have this under active consideration.

The contractors on the DfE (traditional) construction framework were appointed on the basis that they would construct schools at a specified rate per square metre which has been proven to be value for money. The DfE (traditional) construction framework rate structure operates on the basis of capping the maximum percentage margin that a contractor can make on any project.

The DfE are also shortly launching the next offsite schools framework, titled
MMC1. This will enable up to £3bn of offsite school construction over the next 4 years. MMC1 will be available to local authorities in the same manner as the DfE (traditional) construction frameworks. This is because in recent years, there has been an increase in the proportion of projects being constructed through ‘offsite construction’, in which large-scale building components are manufactured in offsite production facilities then brought to the site for rapid assembly to form finished buildings. This has the benefit of shortening programme durations, reducing disruption on site and benefitting productivity within the construction sector.

The DfE frameworks are unique in that they do not charge an access/usage fee which other frameworks do. For example, fees paid to a third-party framework operator which can range from 1 – 2.5% of the capital value of a project and represent a significant cost to the local authority. Any user of the DfE frameworks can engage with the contractors in the same manner as DfE projects do and can rely on DfE senior management leveraged relationships with the contractors.

The frameworks are structured to deliver and respond to a broad value range of capital projects. The contractors on the DfE frameworks range from SMEs to larger contractor firms and the frameworks have the capability of delivering both offsite and traditional construction solutions for projects.

Given the proven efficiencies, I would therefore ask that you give serious consideration to using the DfE frameworks for the delivery of your school infrastructure. Local Authority officers can engage with the DfE framework team and process through the following weblink.

Thank you for your ongoing work and collaboration.

THEODORE AGNEW
Making significant changes to an open academy

Departmental advice for all types of academy trust

March 2016
Contents

1: Summary 3
   About this departmental advice 3
   Expiry or review date 3
   Who is this advice for? 3
   Main points 3

2: Types of changes 5
   Potentially contentious proposals: full business case required 5
   Governance changes to an academy trust 5
   Physical expansion of premises 6
   Physical expansions onto satellite sites 7
   Age range changes 8
   Amalgamations / mergers 10
   Faith-related changes 11
   Other change proposals 12

3: Funding 14

4: What are the steps to making changes? 15
   Who should be consulted and how? 15
   Requesting a change: fast track and full business case 16
     Fast track application: academies rated ‘good’ or ‘outstanding’ 16
     Full business case 17
   Decision making process 19
   Admissions-related changes 19

5: Further Information 21
1: Summary

About this departmental advice

This document provides advice to academy trusts on what they need to do to make a significant change (which in general has an impact on the number, type and / or location of school places) to an open academy.

Academy trusts should ensure that they read this guidance in full to ensure that they are aware of which process their proposal will need to follow and identify whether their proposal can follow the ‘fast track’ application or will require a full business case.

The purpose of this advice is to ensure that additional good quality school places can be provided quickly where they are needed; and expects that academy trusts do not propose changes that will have a negative impact on basic need or other good provision in the area; and so changes can be implemented quickly and effectively where there is a strong case for doing so. There is a general expectation that additional new places will only be provided at academies that have an overall Ofsted rating of ‘good’ or ‘outstanding’.

Expiry or review date

This advice document will be reviewed in February 2017.

Who is this advice for?

Academy trusts considering a change to the characteristics of all types of open academy (as defined in the Academies Act 2010 e.g. free school, studio school and university technical college, including the requirement for it to be 'principally concerned' with providing education for pupils of compulsory school age / under 19). Free schools and academies are not envisaged as being for students aged 19-25.

Governing bodies of maintained schools who wish to propose changes immediately following conversion to academy status.

Separate advice is available on how to make changes to a maintained school.

Main points

• Academy trusts proposing to make a significant change to the characteristics of an open academy, which will affect clauses in their funding agreement, MUST submit a proposal for change in advance of the change being made. Failure to do so could constitute a breach of its funding agreement.
Proposals for change must be submitted to the department through one of two processes, the ‘fast track’ application or ‘full business case’. An assessment of the proposal will be made before the Regional Schools Commissioner (RSC) or Secretary of State, as appropriate, makes a final decision. See part four.

In making decisions on proposals, the RSC will be advised by their Head Teacher Board (HTB).

Certain changes can be fast tracked, at academies, rated as ‘good’ or ‘outstanding’ in their last inspection by Ofsted and do not require a full business case. Part two sets out which applications can be made via this route.

It is expected that RSCs will approve the majority of fast track applications as long as the academy trust can provide the required evidence set out in part four. The department may, on occasion, need to request additional information depending on the complexity of the proposed change.

Changes which do not meet the fast track criteria will require a full business case. The RSC will make a decision based on consideration of the factors and evidence relating to the academy trust(s) as set out in part four.

Academy trusts will need to ensure that a fair and open local consultation has been undertaken; the change is aligned with local pupil place plans; that all required funding is in place and appropriate planning permissions and other consents have been secured to support all proposals. Any unfunded proposal will require a full business case, regardless of Ofsted rating or type of change.

Where a proposed change sets a precedent, or is considered contentious a full business case will usually be required, regardless of the academy’s Ofsted rating. RSCs may choose to escalate such proposals to the Secretary of State to decide.

All proposed changes which require changes to admission arrangements must ensure that a fair and open local consultation on changing the school’s proposed admission arrangements has been completed, in accordance with the School Admissions Code. See part four.

For cases where a significant change will require admission arrangements to be varied to implement the proposal; if an existing point of entry will be removed, or the published admission number (PAN) reduced, the variation of the PAN can only normally be implemented for the following September if it can be agreed before the closing date for applications. This will not prevent the rest of the proposal from being approved see part four.

Once a change has been approved, the responsibility for updating the academy’s details on the department’s EduBase system lies with the academy trust.
2: Types of changes

This section provides details of significant changes which require approval, either through a fast track application or full business case. The academy trust should provide additional evidence and respond promptly to requests for clarification or further information.

Potentially contentious proposals: full business case required

Where a proposed change sets a precedent or is potentially contentious, a full business case will usually be required, regardless of the academy’s Ofsted rating and whether the type of change being proposed is eligible for the fast track process. Examples are those:

- which reduce places in an area of basic need; and

- which have received objections from the LA and/or neighbouring schools that the proposed change will undermine the quality of education provided by other ‘good’ or ‘outstanding’ schools in the area, by creating additional places where there is already surplus capacity.

Where proposals are particularly controversial and could attract public or press attention; RSCs may choose to escalate such proposals to ministers for a decision.

Governance changes to an academy trust

This guidance does not apply to governance changes such as a single academy trust (SAT) joining or becoming a multi-academy trust (MAT) or a SAT or MAT adding a new free school. There are different routes to becoming a MAT so, depending on what route a SAT takes, they need to access the appropriate link and follow the process below. The case will be assessed then the RSC makes a final decision. The change will need to be reflected in funding agreements and articles of association as necessary.

All applications must be submitted to academy.questions@education.gsi.gov.uk for:

- SATs thinking about setting up a MAT to become a sponsor;

- SATs/MATs wishing to add a new free school to their trust;

- The SAT to MAT application form must be used in the following situations:
  
  - MATs who are taking responsibility for an existing SAT;
  
  - Two or more SATs coming together to set up a MAT;
  
  - A SAT working with other schools who want to form a MAT; and
• SATs becoming MATs where there are no other schools involved at all and where the change does not relate to becoming a sponsor.

Physical expansion of premises

A significant expansion is defined as an enlargement of the site so that it can provide spaces for at least 30 additional pupils. **If this criteria is not met schools do not need to seek approval via the significant change process, but will need to seek agreement to amend the capacity figure in the funding agreement.**

Under section 14 of the [Education Act 1996](https://www.legislation.gov.uk/ukpga/1996/49), every local authority (LA) has a statutory duty to provide sufficient school places for all pupils in its area. The department has a strong expectation, especially in areas of basic need, that all ‘good’ and ‘outstanding’ academies should consider how they can best support their LA in meeting this duty. To help achieve this, academies can propose either an expansion of their school premises, increase their PAN or admit over PAN.

The department expects that only academies that are rated as ‘good’ or ‘outstanding’ will seek to expand their premises, in order to increase their intake. Only in very limited circumstances will the RSC consider approval of a proposal to expand from a school in another category, for example:

- where the academy is in an area of critical basic need;
- all other options for providing additional places have been fully explored; **and**
- the academy has a robust improvement plan in place.

Academies rated ‘good’ or ‘outstanding’ at their last inspection, proposing to physically expand their school premises, may follow the fast track process, unless the proposal;

- results in an increase of over: 50% in the school’s capacity; **and/or**
- increases pupil numbers to 2,000 pupils or more.

Where the fast track requirements are not met, expansion proposals will require a full business case.

**Part four** explains the steps to making a significant change and the information needed for both a fast track application and full business case.

**Special academies** that are proposing to increase the physical capacity (number of pupils for which the schools is organised to make provision) of the school (including where PAN only is increased), and when taking into account all previous increases), by 10% or 20 pupils (whichever is the lesser) will need to seek approval based on a full business case regardless of their Ofsted rating.
Physical expansions onto satellite sites

Where academy trusts wish to expand onto an additional site they will need to consider whether the new provision is genuinely a change to an existing school or is in effect a new school.

The establishment of new selective schools in all cases is prohibited by statute. Expansion of any existing academy onto a satellite site will only be approved if it is a genuine continuance of the same school.

When deciding whether to approve an expansion onto a satellite site, the RSC on behalf of the Secretary of State will consider factors including:

The reasons for the expansion

- What is the rationale for this approach and this particular site?

Admission and curriculum arrangements

- How will the new site be used (e.g. which age groups/pupils will it serve)?
- What will the admission arrangements be?
- Will there be movement of pupils between sites?

Governance and administration

- How will whole school activities be managed?
- Will staff be employed on contracts to work on both sites? How frequently will they do so?
- What governance, leadership and management arrangements will be put in place to oversee the new site (e.g. will the new site be governed by the same governing body/academy trust board and the same school leadership team)?

Physical characteristics of the school

- How will facilities across the two sites be used (e.g. sharing of the facilities and resources available at the two sites, such as playing fields)?
- Is the new site in an area that is easily accessible to the community that the current school serves?

The purpose of considering these factors is to determine the level of integration between the two sites; the more integration, the more likely the change can be considered to be an expansion.
Academy trusts proposing to expand onto a satellite site will always be required to submit a full business case, to enable the department to ensure the proposal is a genuine expansion and does not in effect constitute a new academy. For selective academies the final decision will be made by the Secretary of State.

<table>
<thead>
<tr>
<th>Type of proposal</th>
<th>Fast Track route possible?</th>
<th>Full business case needed?</th>
</tr>
</thead>
<tbody>
<tr>
<td>Physical expansion of premises</td>
<td>Yes</td>
<td>Possibly</td>
</tr>
<tr>
<td></td>
<td>If the change meets the expansion criteria; the academy is currently rated ‘good’ or ‘outstanding’ and the proposal is not considered contentious</td>
<td></td>
</tr>
<tr>
<td>Physical expansion onto an additional or satellite site</td>
<td>No</td>
<td>Yes</td>
</tr>
<tr>
<td>Physical expansion of premises - special academy</td>
<td>No</td>
<td>Yes</td>
</tr>
<tr>
<td></td>
<td>If the increase is for 10% or 20 pupils (whichever lesser)</td>
<td></td>
</tr>
</tbody>
</table>

See part four for more detail.

**Age range changes**

Academies rated as ‘good’ or ‘outstanding’ at their last Ofsted inspection can propose to change the age range of their school by up to two years (including adding nursery provision but excluding adding a sixth-form) by following the fast-track process.

Only in very limited circumstances will the RSC consider approving a proposal from a school rated as any other category, for example:

- where the academy is in an area of basic need; or
- where there are no other options for meeting the need for additional places; **and**
- the academy has a robust improvement plan in place.

Academy trusts proposing to change the age range of their school by three years or more; add a sixth-form, or make any age range change which could be considered contentious, or which will set a precedent for schools in their local area, will usually need to submit a full business case.
Where proposals are likely to have a significant impact on other local provision a full business case will usually be required to provide evidence that the education of children in the area, as a whole, will not be compromised. Where local provision is organised in three tiers and the aim is to move to two tier age range, the department expects schools to work together to ensure an appropriate co-ordinated implementation, and will only approve any individual proposal in that context.

The addition or removal of a relevant age group must be consulted on in accordance with the School Admissions Code.

There is a general presumption that a primary school seeking to expand its provision by adding secondary level provision will in effect be a new school, and that the academy trust will therefore need to apply to the department to set up a presumption free school rather than seeking to make this change via a change of age range proposal.

If fast-track conditions are not met, a full business case is always required, see part four.

Proposals to add sixth-form provision will require a full business case and should normally only be put forward for existing academies rated as 'good' or 'outstanding'.

Applications for the addition of a sixth-form will be assessed against the following quality criteria; these will be used as guidelines when being considered by the RSC:

- Size, an expectation of around 200 students or more, either in the institution or through partnership;
- Breadth, an expectation that a student should be able to choose from around 15 A levels across a range of subjects, either in the institution or through partnership;
- Demand, including any shortage of post 16 places, and assessment of the quality of level 3 provision overall in the area and the impact of the new provision on other providers;
- Financial viability and value for money, including testing financial resilience should student numbers fall and considering the degree, and impact on 11-16 education, of cross-subsidisation of funding from the school’s other budgets.

A request for a variation to admission arrangements, in line with the School Admissions Code, will be necessary if the school wants to admit external pupils to the sixth-form.
Proposals to remove sixth-form provision can be made as a fast track application.

<table>
<thead>
<tr>
<th>Type of proposal</th>
<th>Fast Track route possible?</th>
<th>Full business case needed?</th>
</tr>
</thead>
<tbody>
<tr>
<td>Change of lower or upper age limit by up to 2 years (including adding a nursery(^1) but excluding adding a sixth-form)</td>
<td>Yes</td>
<td>Possibly</td>
</tr>
<tr>
<td>If the academy is currently rated ‘good’ or ‘outstanding’ and the proposal is not considered contentious</td>
<td>If the academy is not rated as ‘good’ or ‘outstanding’ or where the proposal could be considered contentious</td>
<td></td>
</tr>
<tr>
<td>Change of lower or upper age limit by 3 years or more</td>
<td>No</td>
<td>Yes</td>
</tr>
<tr>
<td>Adding a sixth-form</td>
<td>No</td>
<td>Yes</td>
</tr>
<tr>
<td>Removing a sixth-form</td>
<td>Yes</td>
<td>No</td>
</tr>
<tr>
<td>Case should address how displaced pupils will be offered alternative places.</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

See part 4 for more detail

### Amalgamations / mergers

In ALL cases, proposals for amalgamation or merger with another academy will require a full business case, regardless of either academies Ofsted rating. The academy trust must propose to close one (or more) school (terminating the funding agreement(s) in the process) and propose to enlarge/change the age range/transfer site of an existing academy to accommodate the displaced pupils. The remaining academy will retain its school number, as it is not a new school, even if its age-range/phase has changed.

As these proposals will involve the closure of at least one school, academy trusts should be mindful of TUPE implications. The issue and implications of excess land will be dealt with by the department as part of an amalgamations / merger case.

<table>
<thead>
<tr>
<th>Type of proposal</th>
<th>Fast Track route possible?</th>
<th>Full business case needed?</th>
</tr>
</thead>
<tbody>
<tr>
<td>Amalgamating or merging with another academy</td>
<td>No</td>
<td>Yes</td>
</tr>
<tr>
<td>Case should address TUPE and land issues, as applicable.</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

See part four for more detail

---

\(^1\) Small Business Enterprise and Employment Act 2015 - schools no longer have to register, separately with Ofsted, their early year's provision for two, three or four-year olds, so long as it meets certain requirements. Contact Ofsted for further details. Early years provisions in Childcare Act 2006 will need to be addressed.
Faith-related changes

Gaining, removing or changing a faith designation requires approval based on a full business case. Only academies that are designated with a religious character can admit pupils and appoint staff by reference to faith criteria or teach religious education/deliver collective worship according to the tenets of the faith designation.

Before they may apply for a designation of a religious character, academy trusts are required, by their funding agreement, to seek the Secretary of State’s consent. The relevant RSC will make this decision on behalf of the Secretary of State.

The academy trust must clearly set out, as a minimum, in their business case: their proposed new governance and staffing arrangements; the basis on which they believe the change is needed; and, why it will benefit the academy and the wider community. They must show that there is support for this change from their school and wider local community and have the express consent of the relevant religious body to become a school designated with a religious character. If faith based admission arrangements are proposed these must be consulted upon too, in accordance with the School Admissions Code. The academy trust should also consider if an Equalities Impact Assessment should be completed, and include this with the business case.

It is possible for an academy that was formerly a voluntary controlled school to alter certain characteristics; i.e. their governance structures, approach to employment of staff; teaching of religious education and collective worship, so they are akin to those of a voluntary aided (VA) school.

This gives the academy greater freedoms in relation to how they maintain and develop their faith ethos. Therefore, the academy trust is required to undertake a local consultation and submit a summary of the results with their application. Once the RSC is satisfied there is sufficient support, changes are made to the funding agreement and articles of association. If the school wishes to have VA style freedoms in relation to employment of staff, an Order will be issued to ensure compliance with legislation.

<table>
<thead>
<tr>
<th>Type of proposal</th>
<th>Fast Track route possible?</th>
<th>Full business case needed?</th>
</tr>
</thead>
<tbody>
<tr>
<td>Gaining, removing or changing a faith designation</td>
<td>No</td>
<td>Yes</td>
</tr>
<tr>
<td>Change a Church of England academy’s characteristics</td>
<td>No</td>
<td>Yes</td>
</tr>
</tbody>
</table>

See part four for more detail
Other change proposals

Transfer to another site can mean an enlargement of the premises, but might also affect the catchment area. If so, the academy trust will also need to reconsider their admission arrangements. A full business case is required in all cases.

Change of gender composition, made via a full business case, allows a move from single sex to co-educational (or vice versa). A change from single sex to co-educational provision in post-16 provision can be made through the normal procedures for changing admissions. Academy trusts should remember that a co-educational school cannot change its nursery or post-16 provision to single sex.

Change in type of SEN provision proposals require a full business case and allow special academies to add, remove the designation and categories of SEN provision that they currently provide.

Changes affecting provision reserved for pupils with SEN proposals require a full business case to add or remove the reserved provision or increase or decrease the number for which the reserved provision caters. The characteristics of the reserved provision may also be changed so as to change the age range or type of SEN for which the reserved provision caters. Academy trusts should note that provision reserved for pupils with SEN includes both "resourced provision" – where pupils spend more than half of their time in mainstream classes with support – and "designated SEN units" – where pupils spend more than half of their time in special classes.

Proposals for adding or increasing boarding provision can be made through a fast track application. In these cases compliance with health and safety, fire, planning regulations will be required.

When adding new boarding or residential provision an Ofsted material change inspection is required, before the boarding provision can be operational, to ensure the boarding schools national minimum standards and residential special schools national minimum standards are met. The department will commission the inspection to check that the school is likely to meet the standards. Ofsted will normally contact the school two days prior to the inspection.

An inspection is not required where an academy is proposing to increase existing boarding provision.

Where an academy makes accommodation arrangements for boarders – for example with host families – the academy must still register as a boarding school. A fast track application will need to be made as well as a material change inspection.

Decrease in, or removal of boarding provision requires a full business case when the proposal is to decrease by 50 pupils or 50% (whichever is the greater), or the entirety of boarding provision.
<table>
<thead>
<tr>
<th>Type of proposal</th>
<th>Fast Track route possible?</th>
<th>Full business case needed?</th>
</tr>
</thead>
<tbody>
<tr>
<td>Transfer to another site</td>
<td>No</td>
<td>Yes</td>
</tr>
<tr>
<td>Change of gender composition - single sex to co-educational (vice versa)</td>
<td>No</td>
<td>Yes</td>
</tr>
<tr>
<td>Change in type of SEN provision</td>
<td>No</td>
<td>Yes</td>
</tr>
<tr>
<td>Changes affecting provision reserved for SEN pupils</td>
<td>No</td>
<td>Yes</td>
</tr>
<tr>
<td>Adding or increasing boarding provision</td>
<td>Yes</td>
<td>No</td>
</tr>
<tr>
<td>However other legislation, as above, applies and will need to be complied with.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Decrease in, or removal of boarding provision</td>
<td>No</td>
<td>Yes</td>
</tr>
<tr>
<td>If proposal is to remove at least 50% or 50 pupils (whichever greater), or entire boarding provision</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

See [part four](#) for more detail
3: Funding

Generally the department does not provide funding for significant changes or any associated legal or administrative costs. Academy trusts will need to consider how to fund any associated costs in terms of capital funding. The proposal should include indicative costings and an explanation of how these will be met.

Where capital funding for the expansion of high performing academies is to be sought through the Condition Improvement Fund (CIF), academy trusts will need to state this in their business case. The decision on capital funding rests with the minister, taking into account the RSC’s views on the proposed significant change. Academies will need to make a separate CIF application to demonstrate their ability to plan and deliver the proposed capital project ahead of the December deadline. From September 2016 the intention will be for academies to make a single application for the significant change and capital approval. Please see the Condition Improvement Fund guidance which sets out the eligibility criteria and application process for the 2016-17 round.

It is expected that all academies that were rated as ‘good’ or ‘outstanding’ at their last Ofsted inspection and are situated in areas of population growth will actively consider how they can best support the LA in meeting its duty to supply sufficient school places. This can include increasing PAN without expansion of the premises or an expansion of the premises and an increase in the PAN. Where an academy agrees to expand in response to a proposal by an LA to meet a local need for places, the LA should meet these costs. The department provides capital funding to local authorities facing a shortfall of places (basic need), to help support them to meet their statutory duty to secure sufficient school places in their area.
4: What are the steps to making changes?

Academy trusts should always discharge their Public Sector Equality Duty\(^2\) in proposing changes and consider if the proposed change will affect the trusts governing documents.

For ALL significant change enquiries and proposals, academy trusts will need to contact the department, via an enquiry form, at least three months prior to the proposed change coming into effect. This is to ensure that there is time for the decision to be made and that the funding agreement and, if necessary, the admission arrangements can be varied BEFORE the change can take effect. Failure to follow the correct procedure could constitute a breach of the funding agreement.

Who should be consulted and how?

For both full business case proposals and fast track applications the academy trust will need to confirm that a fair and open local consultation has been undertaken, with all those who could be affected by the proposed change, and that the proposal takes account of all responses received. Comments or objections can be made on any grounds and opportunities for feedback should be given at all public and stakeholder meetings.

The LA will hold important contextual information on the requirement for places locally, and must be consulted in all cases. The RSC (or the Secretary of State as appropriate) will need to be satisfied that the LA has been consulted, and will consider any reasonable objections from them.

A condition of funding for any future capital funds is that the academy trust has conducted a consultation, that responses have been taken into account, and that any consents required have been given. Changes will not be agreed unless appropriate consultation has taken place.

If you are a maintained school and are consulting on proposals to make a significant change as soon as you become an academy, this must be undertaken as part of your section 5 (conversion) consultation. Decisions about significant changes immediately following conversion are separate to decisions about conversion, and may not be approved when conversion is approved.

The department considers the stakeholders listed below should be consulted about proposals for change, but others may also be included:

- each LA which maintains an Education Health and Care Plan (EHCP) or statement of SEN in respect of a child attending the academy.

---

\(^2\) Section 149 *Equality Act 2010*
• parents of children who attend the academy.

• parents in the area.

• primary, secondary and special schools and sixth-form and FE colleges in the area.

• The Admissions Forum for the academy’s area, where one exists (if admissions are to be affected).

• affected admission authorities, including those in neighbouring LA areas (if admissions are to be affected).

• any diocesan / religious authority for academies designated with a religious character must be consulted.

The consultation process on a significant change should run for a minimum of four weeks, although where there are any changes requiring a change to admission arrangements there must be a six week consultation on the admission arrangements, with the parties set out in the School Admissions Code.

It is important to take timing into account in order to maximise responses to the consultation, including attendance at any public meetings – for example, consulting during term time rather than school holidays. The location of public and stakeholder meetings should also be planned to maximise responses. It is good practice to hold meetings in the academy or in a venue close to it. It is also important when making changes that affect admission arrangements to ensure your consultation is completed and business case and variation request submitted in sufficient time to ensure any changes to an admission policy can be implemented before parents submit their applications for school places.

Guidance is available from the Cabinet Office on consultation principles, which can be used for examples of good practice.

**Requesting a change: fast track and full business case**

**Fast track application: academies rated ‘good’ or ‘outstanding’**

Changes which can be made via the fast tracked application i.e. do not require a full business case, at academies, rated as 'good' or 'outstanding’ in their last inspection by Ofsted, are:

• a significant expansion unless it results in an increase of over 50% in the school’s capacity, takes pupil numbers to 2,000 or more and results in an expansion onto a satellite site;
• an age range change (by up to two years) e.g. to extend existing nursery provision to two year-olds, unless the case is likely to be contentious; and excluding adding a sixth-form;

• adding boarding provision and,

• removing a sixth-form.

It is expected that RSCs will approve the majority of fast track requests from academies currently rated as ‘good’ or ‘outstanding’ provided that the academy meets all the fast-track criteria (as below) and is prepared to demonstrate, with evidence if requested:

• a fair and open consultation has taken place, including that any consultation relating to admission arrangements which are necessary has been undertaken, the number and percentage in favour of the change has been considered, and if there are any objections, how the issues raised will be (or have been) managed;

• funding has been secured in relation to the proposed change for both capital costs, and that there are no issues with current budget and/or finances. In the case of expansions, academies have sufficient funding for additional pupils, until lagged funding is applied;

• the change is aligned with local pupil place plans and it is unlikely to have a negative impact on educational standards at the academy or at other local schools or colleges; and

• that appropriate planning permissions and other consents required have been secured.

The department may on occasion need to request additional information to that requested above, depending on the complexity of the proposed change. Whilst there is a presumption that changes deemed ‘fast track’ will be approved, change found not to have met the criteria will not be approved by the RSC. When assessing a fast track application, the RSCs will consider the impact that the proposed change will have on the quality and capacity of the academy.

**Full business case**

For full business case proposals, the RSC, advised as necessary by their HTB, will make a decision based on consideration of the factors and evidence provided by the academy trust(s) which are:

• educational track record and current performance of the academy;

• the details of the change, including the rationale and impact on the school, any potential issues/risks relating to the proposals (e.g. changes to leadership and
governance, any foreseen adaptations, additions, refurbishments or land transfers needed), and evidence of demand;

• when the change is to be implemented, and how (e.g. will it be done in stages);

• details of the schools at which displaced pupils will be offered places (if applicable), including any interim arrangements; the alternative provision for children recognised by the LA as reserved for children with special education needs; and in the case of special academies, the alternative provision made;

• local context including supply of school places data, LA wider position data and the impact on the availability of places, the effect on other schools, academies, colleges and educational institutions within the LA;

• evidence of fair and open local consultation, including an overview of the responses to the consultation;

• the degree of LA support and what the academy has done in response to any consultation responses from them;

• financial health of the academy and funding arrangements of the proposed change, any indicative costings and an indication of how these might be met, including how the change will be sustained in terms of capacity and value for money;

• a request for a variation of the admission arrangements, where changes are necessary to implement an approved change. The request should flag whether it is proposed that a PAN will be reduced, or a relevant age group for admission will be removed;

• information on the consultation on the proposed change including any admissions consultation, including the number and percentage in favour of the change, and if there are any objections, how the issues raised will be (or have been) managed;

• when an academy is proposing changes to its SEN provision, the business case must demonstrate that the proposed change will not have a detrimental impact on local SEN provision;

• details of financial and governance arrangements and if appropriate, confirmation that planning permission has been secured;

• the consent of any relevant religious authority and/or site trustees; and

• any implications for other statutory requirements e.g. under TUPE, childcare (early years), equalities and health and safety legislation.
Decision making process

The RSC, advised by their HTB, will consider the proposal and either approve or reject it. The RSC may also defer the approval pending further evidence. Where proposals are particularly controversial and could attract adverse public or press attention; the RSC may choose to escalate such proposals to the Secretary of State for a decision.

The department will notify the academy trust of the RSC’s decision. The responsibility for amending trust documentation lies with the trust.

The responsibility for updating the academy’s details on the department’s EduBase system also lies with the academy trust. Further guidance on using EduBase is available on the EduBase website. Ofsted use EduBase as part of their inspection scheduling and to ensure relevant inspector expense, so it is important that significant changes are accurately and promptly recorded.

Admissions-related changes

Reductions in the PAN, or the removal of a relevant age group, must be consulted on in accordance with the School Admissions Code or, if a variation is sought because of a major change in circumstances, the request must be made sufficiently in advance of the closing date for admissions applications.

What should be done when a change affects admissions but cannot meet the normal timescale for making changes to admission arrangements’?

- All academies are contractually obliged to comply with the School Admissions Code, including the timescale for changing admissions.

- The normal lead in time between beginning consultation on changing admission arrangements, as set out in the School Admissions Code, and determining those arrangements as final, is 17 months which includes a six week statutory consultation on the proposed revision to arrangements. However, this may not always be possible – for example, if the timing for a significant change does not align with the normal admissions consultation timetable.

- Where it is not possible to follow the normal admissions timetable, academies must seek a ‘variation’ of their admission arrangements at the same time as they submit their full business case for the significant change.

- A variation can only be agreed if there is a major change in circumstances necessitating the change to the admission arrangements.

- All variation requests should be the minimum necessary to implement the significant change, if approved.
What needs to be done before the variation of the admission arrangements can be agreed?

- The academy trust must consult the relevant persons or bodies as set out in the School Admissions Code.

- The consultation must cover the relevant change to the admission arrangements.

- The consultation on admission arrangements should last six weeks.

- Evidence of the consultation should be submitted with the business case.

- Where a change reduces a PAN or removes a relevant age group, it is essential a decision is made before parents apply for a place. Submissions must be sufficiently in advance of the closing date for applications in order to allow the RSC, on behalf of the Secretary of State, to take a decision. The following deadlines apply:
  - Changes reducing a primary PAN or removing a primary relevant age group for admission – submission to the department by 1 November\(^3\) in the year before the change will be implemented;
  - Changes reducing a secondary PAN or removing a secondary relevant age group for admission – submission to the department by 31 August\(^4\) in the year before the change will be implemented;

What changes to admissions arrangements are likely to be necessary if the age range is changed?

- Where, for example, a school changes its age range from 11-16 to 4-16, the department would normally expect the current oversubscription criteria to be used. However a new PAN, to apply to reception as a new point of entry, should be determined and the year seven PAN may need to be reduced or removed.

- Where a school adds boarding provision, a boarding admission number and boarding admission criteria must be adopted.

- Where a school adds a sixth-form, there is no need for changes to be made to admission arrangements unless the intention is to admit external pupils, in which case a year 12 PAN and oversubscription criteria must be included.

---

\(^3\) The closing date for parents to submit an application for the following September is 15 January

\(^4\) The closing date for parents to submit an application for the following September is 31 October
5: Further Information

Queries can be made via the online enquiry form.

- Education Act 1996
- Childcare Act 2006
- Academies Act 2010
- Equality Act 2010
- Small Business Enterprise and Employment Act 2015
- The School and Early Years Finance (England) Regulations 2014
- Regional Schools Commissioners
- Head Teacher Board
- Charity Commission
- Establishing a new school: free school presumption
- Opening a free school
- Sponsor an academy
- Academies funding payments and compliance
- Condition Improvement Fund guidance
- The School Admissions Code
- Governors' handbook
- Change your charity's governing document
- Boarding schools national minimum standards
- Residential special schools national minimum standards
- Ofsted material change inspection
- EduBase
- How to make changes to a maintained school
- Consultation principles guidance
Making ‘prescribed alterations’ to maintained schools

Statutory guidance for proposers and decision-makers

April 2016
## Contents

1: Summary
   - About this guidance 5
   - Review date 5
   - Who is this guidance for? 5
   - Main points 6

2: Prescribed alteration changes
   - Enlargement of premises 7
   - Expansion onto an additional site (‘or satellite sites’) 8
   - Reducing pupil numbers in mainstream schools 10
   - Change of age range 11
   - Adding or removing a sixth-form 13
   - Closing an additional site 14
   - Transfer to a new site 15
   - Changes of category 16
   - Single sex school becoming co-educational (or vice versa) 17
   - Mainstream school: establish/remove/alter SEN provision 18
   - Change the types of need catered for by a special school 18
   - Boarding provision 19
   - Remove selective admission arrangements at a grammar school 21

3: Contentious / controversial proposals 22

4: Changes that can be made outside of the statutory process 23

5: Statutory process: prescribed alterations
   - Publication 25
   - Representation (formal consultation) 27
Decision 28
Rights of appeal against a decision 29
Implementation 29
Modification post determination 29
Revocation of proposals 30
Land and buildings for foundation, foundation special or voluntary controlled schools 31

6: Statutory process: foundation proposals 32
Changing category to foundation, acquiring a Trust and/or acquiring a foundation majority 32
Initiation 33
Publication 33
Representation (formal consultation) 34
Decision 35
Implementation 36
Modification post determination 36
Revocation of proposals 36
Governance and staffing issues 36
Land transfer issues 37
Removing a Trust and/or removing a foundation majority 38
Initiation 39
Land and assets (when removing a Trust) 40
Consultation 40
Publication 41
Representation 41
Decision 42
Implementation 42
Modification of proposals 43
Annex A: Information to be included in a prescribed alteration statutory proposal 44
Annex B: Information that must be included in foundation proposals 45
Annex C: Information to be included in proposals to remove a Trust 46
Annex D: Information to be included in proposal to reconstitute the governing body 47
Annex E: Further Information 48
Annex F: Contact details for RSC offices 49
1: Summary

About this guidance

This is statutory guidance from the Department for Education. This means that recipients must have regard to it when carrying out functions relating to making ‘prescribed alterations’ to maintained schools.

The purpose of this guidance is to ensure that additional good quality school places can be provided quickly where they are needed; that local authorities and governing bodies do not take decisions that will have a negative impact on other schools in the area, and that changes can be implemented quickly and effectively where there is a strong case for doing so. In line with these aims it is expected that, where possible, additional new places will only be provided at schools that have an overall Ofsted rating of ‘good’ or ‘outstanding’.

A governing body, LA or the Schools Adjudicator must have regard to this guidance when exercising functions under The School Organisation (Prescribed Alterations to Maintained Schools) (England) Regulations 2013 (‘the Prescribed Alterations Regulations’) and The School Organisation (Establishment and Discontinuance of Schools) Regulations 2013 (‘the Establishment and Discontinuance Regulations’). It should be read in conjunction with Parts 2 and 3 and Schedule 3 of the Education and Inspections Act (EIA) 2006 (as amended by the Education Act (EA) 2011) and the Prescribed Alterations Regulations. It also relates to the Establishment and Discontinuance Regulations and The School Organisation (Removal of Foundation, Reduction in the Number of Foundation Governors and Ability of Foundation to Pay Debts) (England) Regulations (2007).

It is the responsibility of LAs and governing bodies to ensure that they act in accordance with the relevant legislation when making changes to a maintained school and they are advised to seek independent legal advice where appropriate.

Review date

This guidance will be reviewed in April 2017.

Who is this guidance for?

Those proposing to make changes to maintained schools (e.g. governing bodies and LAs), decision-makers (LAs, the Schools Adjudicator and governing bodies), and for information purposes for those affected by a proposal (dioceses, trustees, parents etc.)
This guidance is relevant to all categories of maintained schools (as defined in section 20 of the School Standards and Framework Act (SSFA) 1998), unless explicitly stated. It is not relevant to Pupil Referral Units. Separate advice on making significant changes to an academy, opening and closing a maintained school and the guidance for decision-makers is available.

Main points

• All proposals for prescribed alterations must follow the processes set out in this guidance.

• Where a LA proposes to expand a school that is eligible for intervention they should copy the proposal to the relevant Regional Schools Commissioner.

• To enable the department to monitor potentially controversial proposals, the proposer should copy any proposal which falls within the definitions set out in part 3 to the School Organisation mailbox – schoolorganisation.notrifications@education.gsi.gov.uk.

• Where a LA is the decision maker, it must make a decision within a period of two months of the end of the representation period, taking into account the factors outlined in the guidance for decision-makers. Where a decision is not made within this time frame, the proposal must be referred to the Schools’ Adjudicator for a decision.

• It is not possible for any school to gain, lose or change religious character through a change of category. Information on the process to be followed is available in the opening and closing maintained school guidance.

• It is the department’s view that governing bodies should convert to academy status rather than change category to a foundation. Governing bodies wishing to discuss this issue should email schoolorganisation.notifications@education.gsi.gov.uk and a member of the school organisation team will contact them to discuss the proposed change of category.

• Once a decision has been made the proposer (school governing body or LA) should make the necessary changes to the school’s record in the department’s EduBase system and MUST have done so by the date the change is implemented.
2: Prescribed alteration changes

Enlargement of premises

Details of how special schools can increase their intake are covered below.

Local authorities are under a statutory duty to ensure the sufficiency of school places in their area. They can propose an enlargement of the premises of community foundation and voluntary schools. When doing so they must follow the statutory process as set out in the Prescribed Alterations Regulations (see part 5) if:

- the proposed enlargement of the premises of the school is permanent (longer than three years) and would increase the capacity of the school by:
  - more than 30 pupils; **and**
  - 25% or 200 pupils (whichever is the lesser).
- the proposal involves the making permanent of any temporary enlargement (that meets the above threshold).

Where a proposal seeks to increase the school’s pupil number to over 2,000 or would result in an increase of over 50% of the school’s current capacity, the LA should copy the proposal to schoolorganisation.notifications@education.gsi.gov.uk for monitoring purposes.

Governing bodies of all categories of mainstream schools and LAs can propose smaller expansions that do not meet the thresholds above without the need to follow the formal statutory process in part 4. In many cases this can be achieved solely by increasing the school’s published admissions number (PAN); please see the School Admissions Code.

The table below sets out who can propose an enlargement of premises and what process must be followed:

<table>
<thead>
<tr>
<th>Proposer</th>
<th>Type of proposal</th>
<th>Process</th>
<th>Decision-maker</th>
<th>Right of appeal to the adjudicator</th>
</tr>
</thead>
<tbody>
<tr>
<td>LA for community</td>
<td>Enlargement of premises</td>
<td>Statutory process</td>
<td>LA</td>
<td>CofE Diocese RC Diocese</td>
</tr>
<tr>
<td>LA for voluntary or foundation</td>
<td>Enlargement of premises</td>
<td>Statutory process</td>
<td>LA</td>
<td>CofE Diocese RC Diocese GB / Trustees</td>
</tr>
<tr>
<td>Proposer</td>
<td>Type of proposal</td>
<td>Process</td>
<td>Decision-maker</td>
<td>Right of appeal to the adjudicator</td>
</tr>
<tr>
<td>--------------------------------------</td>
<td>--------------------------------------</td>
<td>-----------------------</td>
<td>----------------</td>
<td>-----------------------------------</td>
</tr>
<tr>
<td>LA for voluntary and foundation</td>
<td>Enlargement of premises (on small scale expansions)</td>
<td>Non statutory process</td>
<td>LA</td>
<td>N/A</td>
</tr>
<tr>
<td>GB of all categories mainstream</td>
<td>Enlargement of premises (on small scale expansions)</td>
<td>Non statutory process</td>
<td>GB</td>
<td>N/A</td>
</tr>
</tbody>
</table>

NB: the LA must make a decision within a period of two months of the end of the representation period or they must be referred to the Schools Adjudicator.

Expansion onto an additional site (‘or satellite sites’)

Where proposers seek to expand onto an additional site they will need to ensure that the new provision is genuinely a change to an existing school and not in reality the establishment of a new school. Where a LA decides that a new school is need to meet basic need the free school presumption process must be followed. Other proposals seeking to establish a new school should follow the free school application process.

Decisions about whether a proposal represents a genuine expansion will need to be taken on a case-by-case basis, but proposers and decision makers will need to consider this non-exhaustive list of factors:

**The reasons for the expansion**

- What is the rationale for this approach and this particular site?

**Admission and curriculum arrangements**

- How will the new site be used (e.g. which age groups/pupils will it serve)?
- What will the admission arrangements be?
- Will there be movement of pupils between sites?

**Governance and administration**

- How will whole school activities be managed?
• Will staff be employed on contracts to work on both sites? How frequently will they do so?

• What governance, leadership and management arrangements will be put in place to oversee the new site (e.g. will the new site be governed by the same governing body and the same school leadership team)?

Physical characteristics of the school

• How will facilities across the two sites be used (e.g. sharing of the facilities and resources available at the two sites, such as playing fields)?

• Is the new site in an area that is easily accessible to the community that the current school serves?

The purpose of considering these factors is to determine the level of integration between the two sites; the more integration, the more likely the change will be considered as an expansion. Where a LA considers there is a need for a new school to address basic need for school places it must\(^1\) seek proposals to establish a free school under the free school presumption.

LAs should copy any proposal to expand a school onto a satellite site to schoolorganisation.notifications@education.gsi.gov.uk for monitoring purposes.

Quality of new places created by expansions

Where schools are underperforming, the quality of new places provided may be compromised by expansion. The department expects that schools should not generally expand if they are eligible for intervention by the local Regional Schools Commissioner (‘RSC’). There will be exceptional cases where there is no viable alternative to ensuring sufficient school places locally. In cases where there is a proposal for a school that is eligible for intervention to expand, we expect LAs to send a copy of the proposals to the RSC so that they can ensure appropriate intervention strategies are agreed or, where appropriate, that there is a robust improvement plan in place.

Change in number of pupils in a special school

Governing bodies of all categories of special school and LAs for community special schools may seek to increase the number of places by following the statutory process in part 5, if the increase is by:

\(^1\) Under section 6A of Education and Inspections Act 2006
• 10%; or
• 20 pupils (five for all boarding special schools) (whichever is the lesser).

The exception to this is where a special school is established in a hospital.

**Governing bodies of all categories of special school and LAs for community special schools** may seek to decrease the number of pupils, by following the statutory process in [part 5](#).

The table below sets out who can propose a change in the number of pupils in a special school and what process must be followed:

<table>
<thead>
<tr>
<th>Proposer</th>
<th>Type of proposal</th>
<th>Process</th>
<th>Decision-maker</th>
<th>Right of appeal to the adjudicator</th>
</tr>
</thead>
<tbody>
<tr>
<td>GB foundation special</td>
<td>Increase by 10% or 20 pupils (5 for boarding special: or Decrease numbers)</td>
<td>Statutory process</td>
<td>LA</td>
<td>CofE Diocese, RC Diocese, GB / Trustees</td>
</tr>
<tr>
<td>GB community special</td>
<td>Increase by 10% or 20 pupils (5 for boarding special: or Decrease numbers)</td>
<td>Statutory process</td>
<td>LA</td>
<td>CofE Diocese, RC Diocese</td>
</tr>
<tr>
<td>LA for community special</td>
<td>Increase by 10% or 20 pupils (5 for boarding special: or Decrease numbers)</td>
<td>Statutory process</td>
<td>LA</td>
<td>CofE Diocese, RC Diocese</td>
</tr>
</tbody>
</table>

NB: the LA must make a decision within a period of two months of the end of the representation period or they must be referred to the [Schools Adjudicator](#).

**Reducing pupil numbers in mainstream schools**

Reductions in pupil numbers at maintained mainstream schools which result in a decrease to the Published Admission Number (PAN) are not covered by the [Prescribed Alterations Regulations](#). Where this is proposed the admissions authority (the LA in the case of community and voluntary controlled (VC) schools or the
governing body in the case of voluntary aided (VA) and foundation schools) must consult on the proposed change in accordance with the School Admissions Code. Community and VC schools have the right to object to the Schools’ Adjudicator if the PAN proposed is lower than they would wish.

**Change of age range**

For changes that are expected to be in place for more than 2 years (as these are considered permanent increases):

**Local authorities** can propose:

- a change of age range of up to 2 years (except for adding or removing a sixth-form) for voluntary and foundation schools by following the non-statutory process, see part 4.

- a change of age range of 1 year or more for community schools (including the adding or removal of sixth-form or nursery provision) and community special schools or alter the upper age limit of a foundation or voluntary school to add sixth-form provision by following the statutory process, see part 5.

**Governing bodies** of foundation and voluntary schools can propose

- an age range change of up to 2 years (except for adding or removing a sixth-form) by following the non-statutory process, see part 4.

- an age range change of 3 years or more or alter the upper age limit of the school to add or remove sixth form provision by following the statutory process, see part 5.

**Governing bodies** of community schools can propose the alteration of their upper age limit to add sixth-form provision following the statutory process, see part 5.

**Governing bodies** of community special and foundation special schools can propose a change of age range of 1 year or more following the statutory process, see part 5.

Where a proposed age range change would also require an expansion of the school’s premises, the LA or governing body must also ensure that they act in accordance with the requirements relating to proposals for the enlargement of premises.

Where a proposal seeks to change the age range of a primary school to make it an all-through (cross phase) school the proposer (as set out below) should copy the
proposal to schoolorganisation.notifications@education.gov.uk for monitoring purposes.

The table below sets out who can propose a change of age range and what process must be followed:

<table>
<thead>
<tr>
<th>Proposer</th>
<th>Type of proposal</th>
<th>Process</th>
<th>Decision-maker</th>
<th>Right of appeal to the adjudicator</th>
</tr>
</thead>
<tbody>
<tr>
<td>LA for voluntary and foundation</td>
<td>Alteration of upper or lower age range of up to 2 years (excluding adding or removing a sixth form)</td>
<td>Non statutory process</td>
<td>LA</td>
<td>NA</td>
</tr>
<tr>
<td>GB of voluntary and foundation</td>
<td>Alteration of upper or lower age range by up to 2 years (excluding adding or removing a sixth-form)</td>
<td>Non statutory process</td>
<td>GB</td>
<td>N/A</td>
</tr>
<tr>
<td>GB of voluntary and foundation</td>
<td>Alteration of upper or lower age range by three years or more</td>
<td>Statutory process</td>
<td>LA</td>
<td>CofE Diocese RC Diocese GB / Trustees</td>
</tr>
<tr>
<td>LA for community and community special</td>
<td>Alteration of upper or lower age range by 1 year or more (for community school including the adding or removal of sixth form or nursery provision)</td>
<td>Statutory process</td>
<td>LA</td>
<td>CofE Diocese RC Diocese</td>
</tr>
<tr>
<td>GB foundation special</td>
<td>Alteration of upper or lower age range by one year or more</td>
<td>Statutory process</td>
<td>LA</td>
<td>CofE Diocese RC Diocese GB / Trustees</td>
</tr>
<tr>
<td>Proposer</td>
<td>Type of proposal</td>
<td>Process</td>
<td>Decision-maker</td>
<td>Right of appeal to the adjudicator</td>
</tr>
<tr>
<td>--------------------------------</td>
<td>------------------------------------------------------</td>
<td>------------------</td>
<td>----------------</td>
<td>-----------------------------------</td>
</tr>
<tr>
<td>GB community special</td>
<td>Alteration of upper or lower age range by one year or more</td>
<td>Statutory process</td>
<td>LA</td>
<td>CofE Diocese RC Diocese</td>
</tr>
<tr>
<td>LA for community</td>
<td>Alteration of upper age range so as to add or remove sixth-form provision</td>
<td>Statutory process</td>
<td>LA</td>
<td>CofE Diocese RC Diocese</td>
</tr>
<tr>
<td>LA for voluntary and foundation</td>
<td>Alteration of upper age range so as to add sixth-form provision.</td>
<td>Statutory process</td>
<td>LA</td>
<td>CofE Diocese RC Diocese GB / Trustees</td>
</tr>
<tr>
<td>GB of voluntary and foundation</td>
<td>Alteration of upper age range so as to add sixth-form provision</td>
<td>Statutory process</td>
<td>LA</td>
<td>CofE Diocese RC Diocese GB / Trustees</td>
</tr>
<tr>
<td>GB of community</td>
<td>Alteration of upper age range so as to add sixth-form provision</td>
<td>Statutory process</td>
<td>LA</td>
<td>CofE Diocese RC Diocese</td>
</tr>
<tr>
<td>GB of voluntary and foundation</td>
<td>Alteration of upper age range so as to remove sixth-form provision</td>
<td>Statutory process</td>
<td>LA</td>
<td>CofE Diocese RC Diocese GB / Trustees</td>
</tr>
</tbody>
</table>

NB: the LA must make a decision within a period of two months of the end of the representation period or they must be referred to the Schools Adjudicator.

Adding or removing a sixth-form

The department wants to ensure that all new provision is of the highest quality and provides genuine value for money. There is a departmental expectation that proposals for the addition of sixth-form provision will only be put forward for secondary schools that are rated as ‘good’ or ‘outstanding’ by Ofsted. Proposers should also consider the supply of other local post-16 provision in the area and assess if there is a genuine need for the proposal.
In deciding whether new sixth-form provision would be appropriate, proposers and decision makers should consider the following guidelines:

- the quality of pre-16 education must be good or outstanding;
- the proposed sixth-form will provide places for a minimum of 200 students;
- the proposed sixth-form will, either directly or through partnership, offer a minimum of 15 A level subjects;
- there is a clear demand for the new sixth-form (including evidence of a shortage of post-16 places and a consideration of the quality of L3 provision in the area);
- the proposed sixth-form is financially viable (there is evidence of financial resilience should student numbers fall and the proposal will not impact negatively on 11-16 education or cross subsidisation of funding).

To admit external pupils to the sixth-form a request for a variation to admission arrangements, in line with the Schools Admissions Code will be needed.

**Closing an additional site**

For foundation and voluntary schools that are already operating on a satellite site, governing bodies must follow the statutory process in part 5, if they are proposing the closure of one or more sites where the main entrance at any of the school’s remaining sites is one mile or more from the main entrance of the site which is to be closed. The LA may make such a proposal for a community school following the statutory process in part 5.

The table below sets out who can propose the closure of an additional site and what process must be followed:

<table>
<thead>
<tr>
<th>Proposer</th>
<th>Type of proposal</th>
<th>Process</th>
<th>Decision-maker</th>
<th>Right of appeal to the adjudicator</th>
</tr>
</thead>
<tbody>
<tr>
<td>LA for community</td>
<td>Closure of one or multiple sites</td>
<td>Statutory process</td>
<td>LA</td>
<td>CofE Diocese RC Diocese</td>
</tr>
<tr>
<td>GB voluntary or foundation</td>
<td>Closure of one or multiple sites</td>
<td>Statutory process</td>
<td>LA</td>
<td>CofE Diocese RC Diocese GB / Trustees</td>
</tr>
</tbody>
</table>
NB: the LA must make a decision within a period of two months of the end of the representation period or the proposal must be referred to the Schools Adjudicator for a decision.

**Transfer to a new site**

Where the main entrance of the proposed new site for a school would be more than two miles from the main entrance of the current school site, or if the proposed new site is within the area of another local authority:

**Local authorities** can propose the transfer to an entirely new site for community schools, community special schools and maintained nursery schools following the statutory process in part 5.

**Governing bodies of voluntary, foundation, foundation special and community special** schools can also propose a transfer to a new site following the statutory process in part 5.

The table below sets out who can propose a transfer to a new site and what process must be followed:

<table>
<thead>
<tr>
<th>Proposer</th>
<th>Type of proposal</th>
<th>Process</th>
<th>Decision-maker</th>
<th>Right of appeal to the adjudicator</th>
</tr>
</thead>
<tbody>
<tr>
<td>LA for community, community special and maintained nursery</td>
<td>Transfer to new site</td>
<td>Statutory process</td>
<td>LA</td>
<td>CofE Diocese RC Diocese</td>
</tr>
<tr>
<td>GB voluntary foundation or foundation special</td>
<td>Transfer to new site</td>
<td>Statutory process</td>
<td>LA</td>
<td>CofE Diocese RC Diocese GB / Trustees</td>
</tr>
<tr>
<td>GB community special</td>
<td>Transfer to new site</td>
<td>Statutory process</td>
<td>LA</td>
<td>CofE Diocese RC Diocese</td>
</tr>
</tbody>
</table>

NB: the LA must make a decision within a period of two months of the end of the representation period or the proposal must be referred to the Schools Adjudicator for a decision.
Changes of category

The department has set out its intention to legislate to remove the option of making a change of category to a foundation. It is the department’s view that schools considering foundation status should convert to academy status in order to gain these freedoms. Governing bodies wishing to discuss a change of category to a foundation should email schoolorganisation.notifications@education.gsi.gov.uk and a member of the school organisation team will contact them to discuss the proposed change of category.

Governing bodies of all categories of maintained schools may, exceptionally, propose to change category by following the statutory process. The addition or removal of a foundation is set out in part 6.

The table below sets out who can propose a change of category and what process must be followed:

<table>
<thead>
<tr>
<th>Proposer</th>
<th>Type of proposal</th>
<th>Process</th>
<th>Decision-maker</th>
<th>Right of appeal to the adjudicator</th>
</tr>
</thead>
<tbody>
<tr>
<td>GB of voluntary</td>
<td>VC to VA</td>
<td>Statutory process</td>
<td>LA</td>
<td>CofE Diocese</td>
</tr>
<tr>
<td></td>
<td>VA to VC</td>
<td></td>
<td></td>
<td>RC Diocese</td>
</tr>
<tr>
<td></td>
<td>VC to VA to foundation</td>
<td>Statutory process proposals</td>
<td>GB</td>
<td>For proposals at a VA school when decided by the GB:</td>
</tr>
<tr>
<td></td>
<td>VC or VA to foundation and acquire foundation</td>
<td>statutory process</td>
<td></td>
<td>LA</td>
</tr>
<tr>
<td></td>
<td>VC or VA to foundation, acquire foundation and majority foundation governors on GB</td>
<td>Foundation proposals statutory process</td>
<td></td>
<td>CofE Diocese</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td>RC Diocese</td>
</tr>
<tr>
<td>GB of foundation</td>
<td>Foundation to VC or VA</td>
<td>Statutory process</td>
<td>LA</td>
<td>CofE Diocese</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td>RC Diocese</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td>GB / Trustees</td>
</tr>
<tr>
<td>GB of foundation</td>
<td>Acquire foundation</td>
<td>Foundation proposals statutory process</td>
<td>GB</td>
<td>N/A</td>
</tr>
<tr>
<td></td>
<td>Acquire a majority of foundation governors on the GB</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>Removal of foundation and/or reduction in majority of foundation</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Proposer</td>
<td>Type of proposal</td>
<td>Process</td>
<td>Decision-maker</td>
<td>Right of appeal to the adjudicator</td>
</tr>
<tr>
<td>--------------------------</td>
<td>----------------------------------------------------------------------------------</td>
<td>------------------</td>
<td>----------------</td>
<td>-----------------------------------</td>
</tr>
<tr>
<td>GB of community</td>
<td>Community to VC or VA</td>
<td>Statutory process</td>
<td>LA</td>
<td>CofE Diocese, RC Diocese</td>
</tr>
<tr>
<td>GB of community</td>
<td>Community to foundation</td>
<td>Statutory process</td>
<td>GB</td>
<td>N/A</td>
</tr>
<tr>
<td></td>
<td>Community to foundation and acquire foundation</td>
<td>Statutory process</td>
<td>GB</td>
<td>N/A</td>
</tr>
<tr>
<td></td>
<td>Community to foundation and acquire majority of foundation governors on GB</td>
<td>Statutory process</td>
<td>GB</td>
<td>N/A</td>
</tr>
<tr>
<td>GB of foundation special</td>
<td>Remove foundation and/or reduce majority of foundation governors on GB</td>
<td>Foundation proposals statutory process</td>
<td>GB</td>
<td>N/A</td>
</tr>
</tbody>
</table>

NB: the LA must make a decision within a period of two months of the end of the representation period or they must be referred to the Schools Adjudicator.

**Single sex school becoming co-educational (or vice versa)**

Proposers can seek to change their school from single sex to co-educational (or vice versa) when they can show that this would better serve their local community. A co-educational school cannot change its nursery or post-16 provision to single sex.

The table below sets out who can change a school from single sex to co-educational (or vice versa) and what process must be followed:

<table>
<thead>
<tr>
<th>Proposer</th>
<th>Type of proposal</th>
<th>Process</th>
<th>Decision-maker</th>
<th>Right of appeal to the adjudicator</th>
</tr>
</thead>
<tbody>
<tr>
<td>LA for community or community special</td>
<td>To co-ed or single sex provision</td>
<td>Statutory process</td>
<td>LA</td>
<td>CofE Diocese, RC Diocese</td>
</tr>
<tr>
<td>GB of foundation, foundation special or voluntary</td>
<td>To co-ed or single sex provision</td>
<td>Statutory process</td>
<td>LA</td>
<td>CofE Diocese, RC Diocese, GB / Trustees</td>
</tr>
<tr>
<td>GB of community special</td>
<td>To co-ed or single sex</td>
<td>Statutory process</td>
<td>LA</td>
<td>CofE Diocese</td>
</tr>
</tbody>
</table>
MAINSTREAM SCHOOL: ESTABLISH/REMOVE/ALTER SEN PROVISION

The table below sets out who can propose to establish, remove or alter SEN provision and what process must be followed:

<table>
<thead>
<tr>
<th>Proposer</th>
<th>Type of proposal</th>
<th>Process</th>
<th>Decision-maker</th>
<th>Right of appeal to the adjudicator</th>
</tr>
</thead>
<tbody>
<tr>
<td>LA for community special</td>
<td>Establish, remove or alter SEN provision</td>
<td>Statutory process</td>
<td>LA</td>
<td>CofE Diocese</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td>RC Diocese</td>
</tr>
<tr>
<td>LA for voluntary and foundation</td>
<td>Establish or remove SEN provision</td>
<td>Statutory process</td>
<td>LA</td>
<td>CofE Diocese</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td>RC Diocese</td>
</tr>
<tr>
<td>GB of foundation and voluntary</td>
<td>establish, remove or alter SEN provision</td>
<td>Statutory process</td>
<td>LA</td>
<td>CofE Diocese</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td>RC Diocese</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td>GB / Trustees</td>
</tr>
</tbody>
</table>

NB: the LA must make a decision within a period of two months of the end of the representation period or they must be referred to the Schools Adjudicator.

CHANGE THE TYPES OF NEED CATERED FOR BY A SPECIAL SCHOOL

The table below sets out who can propose a change to the type of need catered for by a special school and what process must be followed:

<table>
<thead>
<tr>
<th>Proposer</th>
<th>Type of proposal</th>
<th>Process</th>
<th>Decision-maker</th>
<th>Right of appeal to the adjudicator</th>
</tr>
</thead>
<tbody>
<tr>
<td>LA for community special</td>
<td>change designation and categories of SEN provision</td>
<td>Statutory process</td>
<td>LA</td>
<td>CofE Diocese</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td>RC Diocese</td>
</tr>
<tr>
<td>LA for foundation special</td>
<td>change designation and categories of SEN provision</td>
<td>Statutory process</td>
<td>LA</td>
<td>CofE Diocese</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td>RC Diocese</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td>GB / Trustees</td>
</tr>
</tbody>
</table>
Proposer | Type of proposal | Process | Decision-maker | Right of appeal to the adjudicator
---|---|---|---|---
GB of community special | change designation and categories of SEN provision | Statutory process | LA | CofE Diocese RC Diocese
GB of foundation special | change designation and categories of SEN provision | Statutory process | LA | CofE Diocese RC Diocese GB / Trustees

NB: the LA must make a decision within a period of two months of the end of the representation period or they must be referred to the [Schools Adjudicator](https://www.gov.uk/government/organisations/schools-adjudicator).

### Boarding provision

**Local authorities** can propose for:

- community schools the establishment, removal or alteration (decrease by 50 pupils or 50% whichever is the greater) of boarding provision by following the statutory process in [part 5](https://www.gov.uk/government/organisations/schools-adjudicator).

- community special schools the establishment, removal or alteration (increase or decrease by 5 places or more where there are both day and boarding places) of boarding provision following the statutory process in [part 5](https://www.gov.uk/government/organisations/schools-adjudicator).

**Governing bodies** of voluntary and foundation schools can propose the establishment or increase of boarding provision following the non-statutory process ([part 4](https://www.gov.uk/government/organisations/schools-adjudicator)) and the removal or alteration (decrease by 50 pupils or 50% whichever is the greater) of boarding provision by following the statutory process([part 5](https://www.gov.uk/government/organisations/schools-adjudicator)).

**Governing bodies** of special schools can add or remove boarding provision or where the school makes provision for day and boarding pupils can increase or decrease boarding provision by five pupils or more following the statutory process in [part 5](https://www.gov.uk/government/organisations/schools-adjudicator).

The table below sets out who can propose to establish, change or remove boarding provision and what process must be followed:

<table>
<thead>
<tr>
<th>Proposer</th>
<th>Type of proposal</th>
<th>Process</th>
<th>Decision-maker</th>
<th>Right of appeal to the adjudicator</th>
</tr>
</thead>
<tbody>
<tr>
<td>LA for community</td>
<td>Add, remove or change (decrease by)</td>
<td>Statutory process</td>
<td>LA</td>
<td>CofE Diocese RC Diocese</td>
</tr>
<tr>
<td>Proposer</td>
<td>Type of proposal</td>
<td>Process</td>
<td>Decision-maker</td>
<td>Right of appeal to the adjudicator</td>
</tr>
<tr>
<td>-------------------------------------</td>
<td>----------------------------------------------------------------------------------</td>
<td>-----------------------</td>
<td>----------------------</td>
<td>-----------------------------------</td>
</tr>
<tr>
<td>50 pupils or 50% whichever is greater boarding provision.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>GB of foundation or voluntary</td>
<td>Add, remove or change (increase or decrease by 5 pupils or more) boarding provision.</td>
<td>Statutory process</td>
<td>GB</td>
<td>N/A</td>
</tr>
<tr>
<td>LA for community special</td>
<td>Add, remove or change (increase or decrease by 5 pupils or more) boarding provision.</td>
<td>Statutory process</td>
<td>LA</td>
<td>CofE Diocese RC Diocese</td>
</tr>
<tr>
<td>GB of foundation or voluntary</td>
<td>Remove or change (decrease by 50 pupils or 50% whichever is greater) boarding provision</td>
<td>Statutory process</td>
<td>LA</td>
<td>CofE Diocese RC Diocese GB / Trustees</td>
</tr>
<tr>
<td>GB of foundation special</td>
<td>Add, remove or change (increase or decrease by 5 pupils or more) boarding provision</td>
<td>Statutory process</td>
<td>LA</td>
<td>CofE Diocese RC Diocese GB / Trustees</td>
</tr>
<tr>
<td>GB of community special</td>
<td>Add, remove or change (increase or decrease by 5 pupils or more) boarding provision</td>
<td>Statutory process</td>
<td>LA</td>
<td>CofE Diocese RC Diocese</td>
</tr>
</tbody>
</table>

NB: the LA must make a decision within a period of two months of the end of the representation period or the proposal must be referred to the Schools Adjudicator for a decision.
### Remove selective admission arrangements at a grammar school

The table below sets out who can propose the removal of selective admission arrangements\(^2\) and what process must be followed:

<table>
<thead>
<tr>
<th>Proposer</th>
<th>Type of proposal</th>
<th>Process</th>
<th>Decision-maker</th>
<th>Right of appeal to the adjudicator</th>
</tr>
</thead>
<tbody>
<tr>
<td>GB of voluntary or foundation</td>
<td>Remove selective admission arrangements</td>
<td>Statutory process</td>
<td>LA</td>
<td>CofE Diocese, RC Diocese, GB / Trustees</td>
</tr>
<tr>
<td>GB of community</td>
<td>Remove selective admission arrangements</td>
<td>Statutory process</td>
<td>LA</td>
<td>CofE Diocese, RC Diocese</td>
</tr>
</tbody>
</table>

NB: the LA must make a decision within a period of two months of the end of the representation period or the proposal must be referred to the [Schools Adjudicator](https://www.gov.uk/government/organisations/schools-adjudicator) for a decision.

---

\(^2\) In accordance with s.109 (1) of the School Standards and Frameworks Act 1998.
3: Contentious / controversial proposals

The department is keen to ensure that, when proposing:

- enlargement of premises;
- changes to a school’s age range, and / or
- adding a sixth form.

LA’s and governing bodies act reasonably, in line with the principles of public law, to ensure that the changes do not to have a negative impact on the education of pupils in the area.

It is the department’s expectation that, in the majority of cases, it would not be appropriate for a primary school to change its age range to meet the need for new secondary provision. Where the level of basic need is such that a new secondary school is needed, this will trigger the free school presumption process.

To enable the department to monitor potentially controversial proposals, LAs and governing bodies should notify schoolorganisation.notifications@education.gsi.gov.uk of the publication of, any proposals which would:

- result in an existing primary school becoming an all-though school / cross phase school;
- result in an increase of over 50% in the school’s capacity;
- increase the school’s pupil numbers to over 2,000;
- propose expansion onto a separate ‘satellite’ site; or
- have received objections from the LA and / or neighbouring school that the proposed change will undermine the quality of education.
4: Changes that can be made outside of the statutory process

Local authorities and governing bodies of mainstream maintained schools can make limited changes (see section 2 for the exact detail) to their schools without following a statutory process; they are nevertheless required to adhere to the usual principles of public law. They MUST:

- act rationally;
- take into account all relevant and no irrelevant considerations; and
- follow a fair procedure.

The department expects that in making these changes LA’s and governing bodies will:

- liaise with the LA and trustees/diocese (as appropriate) to ensure that, a proposal is aligned with wider place planning/organisational arrangements, and that any necessary consents have been gained;
- not undermine the quality of education provided or the financial viability of other ‘good’ and ‘outstanding’ schools in the local area; or
- not create additional places in a local planning area where there is already surplus capacity in schools rated as ‘good’ or ‘outstanding’ and
- ensure open and fair consultation with parents and other interested parties to gauge demand for their proposed changes and to provide them with sufficient opportunity to give their views. The consultation principles guidance can be referenced for examples of good practice.

Before making any changes governing bodies should ensure that:

- they have consulted with the LA to ensure the proposal is aligned with local place planning arrangements
- they have secured any necessary funding;
- they have identified suitable accommodation and sites;
• they have secured planning permission and/or agreement on the transfer of land where necessary;

• they have the consent of the site trustees or other land owner where the land is not owned by the governing body;

• they have the consent of the relevant religious authority (as required); and

• the admissions authority is content for the published admissions number (PAN) to be changed where this forms part of expansion plans, in accordance with the School Admissions Code.

Once a decision on the change has been made the proposer (i.e. LA or governing body) is responsible for making arrangements for the necessary changes to be made to the school’s record in the department’s EduBase system. These changes must be made no later than the date of implementation for the change.

---

3 Including, where necessary, approval from the Secretary of State for change to the use of playing field land under Section 77(1) of the SSFA 1998.
5: Statutory process: prescribed alterations

The statutory process for making prescribed alterations to schools has four stages:

<table>
<thead>
<tr>
<th>Stage</th>
<th>Description</th>
<th>Timescale</th>
<th>Comments</th>
</tr>
</thead>
<tbody>
<tr>
<td>Stage 1</td>
<td>Publication</td>
<td>(statutory proposal / notice)</td>
<td></td>
</tr>
<tr>
<td>Stage 2</td>
<td>Representation</td>
<td>Must be at least 4 weeks</td>
<td>As prescribed in the ‘Prescribed Alteration’ regulations.</td>
</tr>
<tr>
<td></td>
<td>(formal consultation)</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Stage 3</td>
<td>Decision</td>
<td>LA should decide a proposal</td>
<td>Any appeal to the adjudicator must be made within 4 weeks of the decision.</td>
</tr>
<tr>
<td></td>
<td></td>
<td>within 2 months otherwise it will fall to the Schools Adjudicator.</td>
<td></td>
</tr>
<tr>
<td>Stage 4</td>
<td>Implementation</td>
<td>No prescribed timescale</td>
<td>However it must be as specified in the published statutory notice, subject to any modifications agreed by the decision-maker.</td>
</tr>
</tbody>
</table>

Although there is no longer a statutory 'pre-publication' consultation period for prescribed alteration changes, there is a strong expectation that schools and LAs will consult interested parties, in developing their proposal prior to publication, as part of their duty under public law to act rationally and take into account all relevant considerations. Schools will also need to ensure that they have the consent of the site trustees and other relevant religious authorities4 (where necessary).

When considering making a prescribed alteration change, it is best practice to take timing into account, for example:

- by holding consultations and public meetings – either formal or informal – during term time, rather than school holidays;

- plan where any public and stakeholder meetings are held to maximise response: and

---

• take into account the admissions cycle for changes that will impact on the school’s admission arrangements.

A number of changes can impact on admissions, necessitating reductions in PAN, new relevant age groups for admission or the adoption of revised admission criteria. Changes to admission arrangements can be made by the admission authority in one of two ways:

• the consultation on changing the admission arrangements (as set out in the School Admissions Code) takes place sufficiently in advance of a decision on the prescribed alteration so that the change to admissions can be implemented at the same time as the proposals; or

• a variation is sought, where necessary in view of a major change in circumstances, from the Schools Adjudicator so that the changes to the admission policy can be implemented at the same time as the prescribed alteration is implemented.

Decision-makers should, so far as is possible, co-ordinate with the admission authority, if different, to ensure they avoid taking decisions that will reduce a PAN or remove a relevant age group for admission after parents have submitted an application for the following September (e.g. 31 October for secondary admissions or 15 January for primary admissions.

**Publication**

A statutory proposal must contain sufficient information for interested parties to make a decision on whether to support or challenge the proposed change. Annex A sets out the minimum that this should include. The proposal should be accessible to all interested parties and should therefore use ‘plain English’.

Where the proposal for one change is linked to another, this should be made clear in any notices published. Where a proposal by a LA is ‘related’ to a proposal by other proposers (e.g. where one school is to be enlarged because another is being closed) a single notice could be published.

The full proposal must be published on a website (e.g. the school or LA’s website) along with a statement setting out:

• how copies of the proposal may be obtained;

• that anybody can object to, or comment on, the proposal;

• the date that the representation period ends; and
• the address to which objections or comments should be submitted.

A brief notice (including details on how the full proposal can be accessed e.g. the website address) must be published in a local newspaper. If the proposal is published by a governing body then notification must also be posted in a conspicuous place on the school premises and at all of the entrances to the school.

Within one week of the date of publication on the website, the proposer must send a copy of the proposal and the information set out in the paragraph above to:

• the governing body/LA (as appropriate);

• the parents of every registered pupil at the school - where the school is a special school;

• if it involves or is likely to affect a school which has a religious character:
  • the local Church of England diocese;
  • the local Roman Catholic diocese; or
  • the relevant faith group in relation to the school; and

• any other body or person that the proposer thinks is appropriate.

Within one week of receiving a request for a copy of the proposal the proposer must send a copy to the person requesting it.

There is no maximum limit on the time between the publication of a proposal and its proposed date of implementation. However, proposers will be expected to show good reason (for example an authority-wide reorganisation) if they propose a timescale longer than three years.

**Representation (formal consultation)**

The representation period starts on the date of the publication of the proposal and must last four weeks. During this period, any person or organisation can submit comments on the proposal to the LA to be taken into account by the decision-maker. It is also good practice for representations to be forwarded to the proposer to ensure that they are aware of local opinion.
Decision

The LA will be the decision-maker in all cases except where a proposal is ‘related’ to another proposal that must be decided by the Schools Adjudicator\(^5\).

Decisions must be made within a period of two months of the end of the representation period or they must be referred to the Schools Adjudicator.

However, the body or individual that takes the decision must have regard to the statutory guidance for decision-makers.

When issuing a decision, the decision-maker can:

- reject the proposal;
- approve the proposal without modification;
- approve the proposal with modifications, having consulted the LA and/or governing body (as appropriate); or
- approve the proposal – with or without modification – subject to certain conditions\(^6\) (such as the granting of planning permission) being met.

A proposal can be withdrawn by the proposer at any point before a decision is taken. When doing so the proposer must send written notice to the LA or the governing body (as appropriate); or the Schools Adjudicator (if the proposal has been sent to them). A notice must also be placed on the website where the original proposal was published.

Within one week of making a decision the LA must publish their decision and the reasons for it, on the website where the original proposal was published and send copies to:

- the LA (where the Schools Adjudicator is the decision-maker);
- the Schools Adjudicator (where the LA is the decision-maker);
- the governing body/proposers (as appropriate);
- the trustees of the school (if any);
- the local Church of England diocese;

\(^5\) For example where a change is conditional on the establishment of a new school under section 10 or 11 of EIA 2006 (where the Schools Adjudicator may be the default decision maker).

\(^6\) The prescribed events are those listed in paragraph 8 of Schedule 3 to the Prescribed Alterations Regulations.
• the local Roman Catholic diocese;
• the parents of every registered pupil at the school – where the school is a special school; and
• any other body that they think is appropriate (e.g. other relevant faith organisation).

If the Schools Adjudicator is the decision-maker they must notify the persons above of their decision, together with the reasons, within one week of making the decision. Within one week of receiving this notification the LA must publish the decision, with reasons, on the website where the original proposal was published.

Within one week of the decision being made the proposer (i.e. governing body or LA) should make the necessary changes to the school’s record in the department’s EduBase system and must make the change by the date of implementation.

Rights of appeal against a decision

The following bodies may appeal to the Schools Adjudicator against a decision made by a LA decision-maker, within four weeks of the decision being made:

• the local Church of England diocese;
• the local Roman Catholic diocese; and
• the governors and trustees of a foundation, foundation special or voluntary school that is subject to the proposal.

On receipt of an appeal, an LA decision-maker must then send the proposal, representations received and the reasons for their decision to the Schools Adjudicator within one week of receipt. There is no right of appeal on determinations made by the Schools Adjudicator.

Implementation

The proposer must implement a proposal in the form that it was approved, taking into account any modifications made by the decision-maker.

Modification post determination

If it proves necessary, due to a major change in circumstance, or unreasonably difficult to implement a proposal as approved, the proposer can seek modifications
(e.g. to the implementation date) from the decision-maker before the approved implementation date. However, proposals cannot be modified to the extent that new proposals are substituted for those that have been published.

Details of the modification must be published on the website where the original proposals were published.

**Revocation of proposals**

If the proposer cannot implement an approved proposal because circumstances have changed so that implementation would be inappropriate or implementation of the proposal would be unreasonably difficult, the proposer must publish a revocation proposal, to be determined by the decision-maker, to be relieved of the duty to implement. A revocation proposal must contain:

- a description of the original proposal as published;
- the date of the publication of the original proposal; and
- a statement as to why the duty to implement the original proposal should not apply.

The proposer must publish the revocation proposal on the website and a brief notice of the proposal, including the website address where the proposal is published in a local newspaper. The proposal must contain details of how copies can be obtained; details of where to send comments to; and the date by which comments must be sent.

Where the proposer is the governing body it must send the revocation proposal to the LA within one week of the date of publication on the website. Where the original proposal was decided by the [Schools Adjudicator](#) the LA must refer the revocation proposal together with any comments or objections within two weeks of the end of the representation period to the Schools Adjudicator.

The LA decision-maker, who must determine the revocation proposal within two months of the end of the representation period, must arrange for the revocation determination to be published on the website where the original proposal and revocation proposal were published. The LA decision-maker must also arrange for the following persons to be notified of the revocation decision together with reasons:

- the local Church of England diocese;
- the local Roman Catholic diocese; and
• the governors and trustees of a foundation, foundation special or voluntary school that is subject to the proposal.

The same persons also have the right of appeal to the Schools Adjudicator (within four weeks of determination of the revocation proposal) if they disagree with the decision to revoke the proposal.

**Land and buildings for foundation, foundation special or voluntary controlled schools**

Where a LA is required to provide a site for a foundation, foundation special or voluntary controlled school, the LA must:

• transfer their interest in the site and in any buildings on the site which are to form part of the school's premises to the trustees of the school, to be held by them on trust for the purposes of the school; or

• if the school has no trustees, to the governing body, to be held by that body for the purposes of the school.

In the case of a dispute as to the persons to whom the LA is required to make the transfer, the adjudicator will make a decision.

Further details on land and buildings can be found in paragraphs 17 and 18 of Schedule 3 of the Prescribed Alteration Regulations.
6: Statutory process: foundation proposals

Changing category to foundation, acquiring a Trust and/or acquiring a foundation majority

It is the department’s view that governing bodies should convert to academy status rather than change category to a foundation. Governing bodies wishing to discuss this issue should email schoolorganisation.notifications@education.gsi.gov.uk and a member of the school organisation team will contact them to discuss the proposed change of category.

A ‘Trust school’ is a foundation school with a charitable foundation complying with the requirements set out in SSFA 1998. These include that the Trust must have a charitable purpose of advancing education and must promote community cohesion.

The term ‘acquire a foundation majority’ means acquiring an instrument of government whereby the school’s Trust has the power to appoint a majority of governors on the governing body.

Where exceptionally a school’s governing body considers changing category:

- from community, VA or VC to foundation: or
- from community special to foundation special,

acquiring a Trust and / or acquiring a foundation majority on the school’s governing body, the following five-stage statutory process must be followed:

<table>
<thead>
<tr>
<th>Stage</th>
<th>Description</th>
<th>Timescale</th>
<th>Comments</th>
</tr>
</thead>
<tbody>
<tr>
<td>Stage 1</td>
<td>Initiation</td>
<td></td>
<td>The governing body considers a change of category to foundation / acquisition of a trust / acquisition of a foundation majority.</td>
</tr>
<tr>
<td>Stage 2</td>
<td>Publication</td>
<td></td>
<td>Having gained consent where appropriate.</td>
</tr>
<tr>
<td>Stage 3</td>
<td>Representation (formal consultation)</td>
<td>Must be 4 weeks</td>
<td>As set out in the prescribed alteration regulations.</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>The LA may refer a Trust proposal to the</td>
</tr>
</tbody>
</table>

7 Section 23A
<table>
<thead>
<tr>
<th>Stage</th>
<th>Description</th>
<th>Timescale</th>
<th>Comments</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
<td>Schools Adjudicator during this period if it considers the proposal to have a negative effect on standards at the school.</td>
</tr>
<tr>
<td>Stage 4</td>
<td>Decision</td>
<td>The governing body must decide within 12 months of the date of publication</td>
<td>Unless the LA has referred the proposal to Schools Adjudicator at Stage 3.</td>
</tr>
<tr>
<td>Stage 5</td>
<td>Implementation</td>
<td>No prescribed timescale.</td>
<td>Must be as specified in the statutory notice, subject to any modifications agreed by the decision-maker.</td>
</tr>
</tbody>
</table>

### Initiation

For a proposal to change the category of a school to foundation, the governing body should inform the LA in writing, at least seven days in advance of a meeting, if a motion to consult on a change of category proposal is to be discussed.

Before the governing body can publish a proposal to change category from a voluntary school to a foundation school, the existing trustees and whoever appoints the foundation governors must give their consent.

### Publication

A statutory proposal must contain sufficient information for interested parties to make a decision on whether to support or challenge the proposed change. Annex B specifies the information that the statutory proposal must contain.

Where a proposal is ‘related’ to another proposal, details of this should be made clear in the notice.

The full proposal must be published on a website (e.g. the school or LA’s website) along with a statement setting out:

- how copies of the proposal may be obtained;
- that anybody can object to, or comment on, the proposal;
- the date that the representation period ends; and
the address to which objections or comments should be submitted.

A brief notice (including details on how the full proposal can be accessed e.g. the website address) must be published in a local newspaper, and posted in a conspicuous place on the school premises and at all of the entrances to the school.

Within one week of the date of publication on the website, the governing body must send a copy of the proposal and notification information to:

- the LA;
- the parents of every registered pupil at the school - where the school is a special school;
- if it involves or is likely to affect a school which has a religious character:
  - the local Church of England diocese;
  - the local Roman Catholic diocese; or
  - the relevant faith group in relation to the school; and
- any other body or person that the proposer thinks is appropriate.

Within one week of receiving a request for a copy of the proposal the proposer must send a copy to the person requesting it.

**Representation (formal consultation)**

The representation period starts on the date of the publication of the proposal and must last four weeks. During this period, any person or organisation can submit comments on the proposal to the governing body, to be taken into account when the decision is made.

During the representation period, the LA has the power to require the referral of a proposal to acquire a Trust/foundation majority to the Schools Adjudicator for decision if they consider it will have a negative impact on standards at the school. The specific circumstances in which a referral can be made are if the proposed alteration would result in a community, community special, foundation, foundation special or VC school becoming either or both: a foundation or foundation special school having a foundation; or a foundation or foundation special school whose instrument of government provides for the majority of governors to be foundation
governors. The LA does not have this power in respect of a proposal solely to change category to foundation.\(^8\)

Where a proposal is referred to the Schools Adjudicator, the governing body must forward any objections or comments it has received to the Schools Adjudicator within one week of the end of the representation period.

**Decision**

Unless a proposal has been referred to the Schools Adjudicator (as set out above), the governing body will be the decision-maker and must make a decision on the proposal within 12 months of the date of publication of the proposal.

Where a proposal to acquire a Trust or a foundation majority is linked to a proposal to change category to foundation, they will fall to be decided together.

When issuing a decision, the decision-maker can:

- reject the proposal;
- approve the proposal without modification; or
- approve the proposal with modifications, having consulted the LA.
- approve the proposal with or without modifications but conditional upon:
  - the making of any scheme relating to any charity connected with the school; and
  - the establishment of a foundation.\(^9\)

Where the LA has referred a proposal to acquire a Trust/foundation majority to the Schools Adjudicator for decision, any related proposal(s) (including a change of category to foundation) will also fall to be decided by the Schools Adjudicator.

Within one week of making a decision the governing body must publish a copy of the decision (together with reasons) on the website where the original proposal was published and send copies to:

- the LA
- the local Church of England diocese; and

---

\(^8\) However, where such a proposal is related to a proposal to acquire a Trust, then the whole set of proposals will be referred to the Schools Adjudicator.

\(^9\) As defined in section 23A of the School Standards and Framework Act 1998
• the local Roman Catholic diocese.

**Within one week** of the decision being made the proposer (i.e. governing body or LA) should make the necessary changes to the school’s record in the department’s EduBase system and must make the change by the date of implementation.

Where a proposal has been decided by the governing body and is to change the category of a VA school to foundation (with or without the acquisition of a Trust/foundation majority), the following bodies have the right of appeal to the Schools Adjudicator\(^\text{10}\):

• the LA;

• the local Church of England diocese; and

• the local Roman Catholic diocese.

**Implementation**

The governing body must implement any approved proposal by the approved implementation date, taking into account any modifications made by the decision-maker.

**Modification post determination**

Modifications can be made to a proposal by the governing body after determination but before implementation.

**Revocation of proposals**

See the advice set out for prescribed alteration changes.

**Governance and staffing issues**

Schedule 4 to the Prescribed Alterations Regulations provides further information on the requirements about:

• the revision or replacement of the school’s instrument of government;

---

\(^{10}\) The specific circumstances in which a referral can be made are prescribed under paragraphs 15 of Schedule 1 to the Prescribed Alterations Regulations.
• reconstitution or replacement of the governing body;
• current governors continuing in office;
• Surplus governors;
• transfer of staff; and
• transitional admission arrangements.

**Land transfer issues**

Requirements as to land transfers, when a school changes category or acquires a Trust, are prescribed in Schedule 5 to the Prescribed Alterations Regulations.
Removing a Trust and/or removing a foundation majority

There are five or six statutory stages (depending on the proposal and circumstances) to remove a Trust and/or to reduce a Trust majority. It may be triggered in two different ways – either by a majority or a minority of the governing body:

<table>
<thead>
<tr>
<th>Stage</th>
<th>Description</th>
<th>Timescale</th>
<th>Comments</th>
</tr>
</thead>
<tbody>
<tr>
<td>Stage 1</td>
<td>Initiation</td>
<td></td>
<td><strong>Majority</strong></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>A majority of governors considers publishing a proposal to remove a Trust/reduce the number of governors appointed by the Trust.</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>A minority (of not less than a third of the governors) notify the clerk of the governing body of their wish to publish a proposal to remove a Trust/reduce the number of governors appointed by the Trust.</td>
</tr>
<tr>
<td>Stage 2</td>
<td>Land Issues (applicable only to removal of Trusts)</td>
<td>If not resolved within 3 months, disputes must be referred to the Schools Adjudicator.</td>
<td>In cases of removing Trusts, the governing body, Trustees and the LA must resolve issues related to land and assets before a proposal is published.</td>
</tr>
<tr>
<td>Stage 3</td>
<td>Consultation</td>
<td></td>
<td><strong>Majority</strong></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>A minimum of 4 weeks is recommended.</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>or</td>
</tr>
<tr>
<td>Stage 4</td>
<td>Publication and representation</td>
<td><strong>Majority</strong></td>
<td><strong>Majority</strong></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>6 week representation</td>
</tr>
</tbody>
</table>
### Table: Stages of Decision-Making

<table>
<thead>
<tr>
<th>Stage</th>
<th>Description</th>
<th>Timescale</th>
<th>Comments</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td>period.</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>or</td>
<td></td>
</tr>
<tr>
<td><strong>Minority</strong></td>
<td>Where there are no land or asset issues – publish within 3 months of receipt of notice by governing body clerk – followed by a 6-week representation period.</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>Where there are land issues, publish within 1 month of receipt of School Adjudicator’s determination – followed by a 6-week representation period.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Stage 5</td>
<td>Decision</td>
<td>Within 3 months.</td>
<td>(A proposal initiated by a minority of governors may not be rejected unless at least two-thirds of the governing body are in favour of the rejection).</td>
</tr>
<tr>
<td>Stage 6</td>
<td>Implementation</td>
<td>No prescribed timescale,</td>
<td>But must be as specified in the statutory notice, subject to any modifications agreed by the decision-maker.</td>
</tr>
</tbody>
</table>

### Initiation

A proposal for removing a Trust and/or removing a foundation majority can be triggered by:

- a) a majority\(^{11}\) of the governing body or a committee deciding to publish a proposal. The decision to publish must be confirmed by the whole governing body at a meeting held at least 28 days after the meeting at which the initial decision was made; or

---

\(^{11}\) Regulation 4 of the Removal Regulations
b) at least one-third\(^{12}\) of the governors requesting in writing to the clerk of the governing body, that a proposal be published. No vote of the governing body is required as they are obliged to publish a proposal. To prevent on-going challenges there are a number of prescribed circumstances\(^{13}\) in which there is no obligation to follow the wishes of the minority of governors.

All decisions must be taken in accordance with the processes prescribed in Procedures Regulations\(^{14}\).

**Land and assets (when removing a Trust)**

Before publishing proposals to remove a Trust the governing body must reach agreement with the trustees and LA on issues relating to the school’s land and assets. Where such issues remain unresolved within three months of the initial decision (majority) or receipt of notice by the clerk (minority), they must be referred to the [Schools Adjudicator](#) for determination.

On the removal of the Trust, all publicly provided land held by the Trust for the purposes of the school will transfer to the governing body\(^{15}\). Where the land originated from private sources (for example, where land was gifted on trust), the land will transfer to the governing body in accordance with a transfer agreement, providing for consideration to be paid by the governing body to the Trust where appropriate. However, there may be land which has benefited from investment from public funds which remains with the trustees under the transfer agreement.

Alternatively, there may have been investment by trustees in the publicly provided land or from public funding in the land provided by the trustees. In either of these cases, it may be appropriate for either the trustees or the public purse to be compensated. The possibility of stamp duty land tax may also need to be taken into account.

The Schools Adjudicator will announce its determination in writing to both parties.

**Consultation**

Where a minority of governors initiated the process, this stage does not apply.

Where a majority of governors initiated the process, before publishing a proposal the governing body must consult:

\(^{12}\) See regulation 5 of the Removal Regulations  
\(^{13}\) See regulation 5(4) of the Removal Regulations  
\(^{14}\) Except as otherwise provided by the Removal Regulations.  
\(^{15}\) By virtue of regulation 17(1) of the Removal Regulations
• Families of pupils at the school;
• Teachers and other staff at the school;
• The trustees and, if different, whoever appoints foundation governors;
• The LA;
• The governing bodies of any other foundation or foundation special schools maintained by the same LA for which the foundation acts as a foundation;
• Any trade unions who represent school staff;
• If the school has a religious character, the appropriate diocesan authority or other relevant faith group;
• Any other person the governing body consider appropriate.

**Publication**

Where the decision to publish a proposal was made by a majority of governors, the governing body at this stage must decide whether to go ahead with publishing the proposal.

Where the decision to publish a proposal was made by a minority of governors and there are no land issues to be determined, the governing body must publish the proposal within 3 months of the receipt of the notice by the clerk. If land issues were referred to the Schools Adjudicator, the proposal must be published within 1 month of receipt of its determination.

Proposals to remove a Trust must contain the information at Annex C. Proposals to alter the instrument of government so that foundation governors cease to be the majority of governors must contain the information at Annex D.

**Representation**

The representation period starts on the date of the publication of the proposal and must last six weeks. During this period, any person or organisation can submit comments on the proposal to the governing body to be taken into account when the decision is made.

Unlike the Trust acquisition process there is no power for the LA to refer to the Schools Adjudicator a proposal to remove a school’s Trust or to reduce the number of governors appointed by the Trust. However, governing bodies must bear in mind
that failure to follow the requirements of the statutory process could lead to a complaint to the Secretary of State under Section 496/497 of the Education Act 1996, and/or ultimately be challenged through judicial review.

**Decision**

The governing body is the decision-maker for a removal proposal and must determine the proposal within 3 months of the date of its publication. Decisions must be taken in accordance with the Decision-makers Guidance.

If a proposal was brought forward by a majority of governors, then it may be determined by a majority vote of those governors present\textsuperscript{16}.

If a proposal was brought forward by a minority of governors, then the governing body may not reject the proposal unless two thirds or more of the governors indicate that they are in favour of its rejection\textsuperscript{17}.

The governing body must notify the relevant LA and Trustees of their decision.

**Within one week** of the decision being made the proposer (i.e. governing body or LA) should make the necessary changes to the school's record in the department’s EduBase system and must make the change by the date of implementation.

**Implementation**

The governing body is under a statutory duty to implement any approved proposal, as published, by the approved implementation date, taking into account any modifications made.

Removal of a Trust must be implemented in accordance with regulations 14-18, and reconstitution of the governing body must be implemented as per regulation 14-16 of the Removal Regulations.

In changing category, an implementation period begins when the proposal is decided and ends on the date the proposal is implemented. During this period the LA and governing body are required to make a new instrument of government for the school, so enough time must be built into the timeframe for this to happen. The governing body must then be reconstituted in a form appropriate to the school's new category and also in accordance with the appropriate instrument of government taking into account the School Governance (Constitution) (England) Regulations 2012.

\textsuperscript{16} As per the School Governance (Roles, Procedures and Allowances) (England) Regulations 2013.

\textsuperscript{17} As per regulation 11(2) of the Removal Regulations.
When removing a Trust or a Trust majority, a governor may continue as a governor in the corresponding category (e.g. staff governor, parent governor) if that category remains under the new instrument of government. A member of a current governing body who continues as a governor on these grounds holds office for the remainder of the term for which he or she was originally appointed or elected. Where a school with a religious character has no foundation, the governing body must appoint partnership governors with a view to ensuring that the religious character of the school is preserved and developed in accordance with the School Governance (Constitution) (England) Regulations 2012. There is nothing to prevent the appointment of a former foundation governor being reappointed by the governing body as a partnership governor.

The Trust of a voluntary or foundation school often makes very specific provisions regarding the conduct of the school and the use of any fund held by the Trust for the use of the school and premises. When making a proposal to change category, proposers will need to consider whether the school’s current Trust allows for the change in category proposed. If in doubt, or if a variation in the Trust is clearly necessary, promoters and the relevant site trustees are advised to make early contact with the Charity Commission to apply for the trust to be varied under the relevant trust law.

**Modification of proposals**

Modifications can only be made to the implementation date and the proposed constitution of the governing body.
Annex A: Information to be included in a prescribed alteration statutory proposal

A statutory proposal for making a prescribed alteration to a school must contain sufficient information for interested parties to make a decision on whether to support the proposed change. A proposal should be accessible to all interested parties and therefore use ‘plain English’.

Proposers will need to be mindful of the factors that will inform the decision-makers assessment when determining the proposal.

As a minimum, the department would expect a proposal to include:

- School and LA details;
- Description of alteration and evidence of demand;
- Objectives (including how the proposal would increase educational standards and parental choice);
- The effect on other schools, academies and educational institutions within the area;
- Project costs and indication of how these will be met, including how long term value for money will be achieved;
- Implementation and any proposed stages for implementation; and
- A statement explaining the procedure for responses: support; objections and comments.
Annex B: Information that must be included in foundation proposals

a) name, address and category of the school for which the proposals are being published;

b) implementation date;

c) a statement of which one of, or combinations of, the prescribed alterations in regulation 3 comprise the proposals.

Where the prescribed alteration is a change of category to foundation, the proposals must contain the following information:

a) a statement whether the school will have a foundation and if so, the name or proposed name of the foundation;

b) where it is a change of category to foundation from a VA or VC school, a statement that, in accordance with section 20, the consent of the trustees and the persons by whom the foundation governors are appointed has been obtained; and

c) the rationale for the change and the particular ethos that the foundation will bring to the school.

Where the prescribed alteration is the acquisition of a foundation or a relevant change at a school for which a foundation already acts, the proposals must contain the following information:

a) name or proposed name of the foundation;

b) details of membership of the foundation, including members names;

c) proposed constitution of the school’s governing body;

d) foundation’s charitable objects; and

e) rationale for the alteration and the particular ethos that the foundation will bring to the school.

In addition where the relevant change relates to:

a) a foundation school which, immediately before 25th May 2007, was a foundation school having a foundation; or

b) a foundation school which, having been a voluntary school immediately before 25th May 2007, changed category to a foundation school on or after that date,

the proposal must include a statement that in accordance with section 20 the consent of the trustees and the persons by whom the foundation governors are appointed has been obtained.
Annex C: Information to be included in proposals to remove a Trust

All proposals must include the following information—

- The name, address and category of the school for which the governing body are publishing the proposals,

- The proposed implementation date,

- A statement explaining that any person may object to, or comment on, the proposals and the procedure for making such representations, including—
  - (i) the date pursuant to regulation 10 by which objections or comments should be sent to the governing body, and
  - (ii) the address to which objections or comments should be sent.

- Whether proposals are to be published as required by regulation 4 or under regulation 5(2).

- Information on why it is proposed to remove the school’s foundation.

- Where proposals are to be published pursuant to a decision of the governing body under regulation 4, a summary of any responses to the consultation on removing the school’s foundation.

- Information about the transfer of land held on trust for the purposes of the school should the proposals be approved (with or without modification), including—
  - (a) the proposed terms of any transfer agreement to be entered into in relation to the land, and
  - (b) details of any payments which will fall to be made in relation to the land—
    - (i) by the governing body or the local education authority to the trustees, or
    - (ii) by the trustees to the governing body or the local education authority.

- Confirmation that after any land transfer, the requirements of the School Premises Regulations 1999 will continue to be satisfied.

- The proposed constitution of the governing body after the foundation is removed (as will be set out in a revised draft instrument of government for the school), including an outline of the expected size and composition of the governing body after the removal of the foundation, and, where the school has a religious character, the body who it is proposed will nominate the partnership governors.
Annex D: Information to be included in proposal to reconstitute the governing body

- All proposals must include the following information—
- The name, address and category of the school for which the governing body are publishing the proposals,
- The proposed implementation date,
- A statement explaining that any person may object to, or comment on, the proposals and the procedure for making such representations, including—
  (i) the date pursuant to regulation 10 by which objections or comments should be sent to the governing body, and
  (ii) the address to which objections or comments should be sent.
- Whether proposals are to be published as required by regulation 4 or under regulation 5(2).
- Information on why it is proposed to alter the instrument of government so that the foundation governors cease to constitute the majority of governors.
- Where proposals are to be published pursuant to a decision of the governing body under regulation 4, a summary of any responses to the consultation on altering the instrument of government so that the foundation governors will cease to constitute the majority.
- The proposed constitution of the governing body following the reduction of the foundation governor majority, (as will be set out in a revised draft instrument of government for the school), including an outline of the expected size and composition of the governing body.
Annex E: Further Information

This guidance primarily relates to:

- The School Organisation (Prescribed Alterations to Maintained Schools) (England) Regulations 2013
- The School Organisation (Removal of Foundation, Reduction in Number of Foundation Governors and Ability of Foundation to Pay Debts) (England) Regulations 2007
- The School Organisation (Requirements as to Foundations) (England) Regulations 2007
- The Education and Inspections Act 2006, as amended by the Education Act 2011

It also relates to:

- The School Organisation (Establishment and Discontinuance of Schools) Regulations 2013
- School Governance (Constitution) (England) Regulations 2012
- The School Governance (Constitution and Federations (England) (Amendment) Regulations 2014
- The School Governance (Miscellaneous Amendments) (England) Regulations 2015
- The School Governance (New Schools) England Regulations 2007
- School Governance (Roles, Procedures and Allowances) (England) Regulations 2013
- Childcare Act 2006
- School Premises (England) Regulations 2012
- Making Significant Changes to an Existing Academy (2014);
- Academy/Free School Presumption – departmental advice (2013); and
- Establishing New Maintained Schools – departmental advice for local authorities and new school proposers (2013).
- The Schools Admissions Code
Annex F: Contact details for RSC offices

- East and North East London - RSC.EASTNELONDON@education.gsi.gov.uk
- North - RSC.NORTH@education.gsi.gov.uk
- East Midlands and Humber - EMH.RSC@education.gsi.gov.uk
- Lancashire and West Yorkshire - LWY.RSC@education.gsi.gov.uk
- South Central England and North West London - RSC.SCNWLON@education.gsi.gov.uk
- South East and South London - RSC.SESL@education.gsi.gov.uk
- South West - RSC.SW@education.gsi.gov.uk
- West Midlands - RSC.WM@education.gsi.gov.uk
Secondary Options
2019/20
Temporary: (Taking OVER Published Admission Number – one off)
- Sidney Stringer (30)
- Foxford (5)
- Caludon Castle (30)
- Lyng Hall (30)
- Coundon Court (30)

Permanent: (Increasing Published Admission Number)
- Coundon Court (30)
- President Kennedy (30)
- Cardinal Newman (30)
- Whitley (20)
- Blue Coat (10)

2020/21
Temporary: (Taking OVER Published Admission Number – one off)
- President Kennedy (30)
- Whitley Academy (10)
- Caludon Castle (30)

2021/22
Temporary: (Taking OVER Published Admission Number – one off)
- Caludon Castle (30)
- Westwood Academy (30)

Permanent: (Increasing Published Admission Number)
- Finham Park (30)
- Coundon Court (30)
- Futures Trust – President Kennedy, Barr’s Hill, or Stoke Park (30)
- Sidney Stringer Trust – Sidney Stringer, Ernesford Grange (30)

Option 1 – Recommended Option
Option 2

2019/20
Temporary: (Taking OVER Published Admission Number – one off)
Sidney Stringer (30)
Foxyford (5)
Coundon Court (30)
Lyng Hall (30)

Permanent: (Increasing Published Admission Number)
Coundon Court (30)
President Kennedy (30)
Cardinal Newman (30)
Whitley (20)

2020/21
Temporary: (Taking OVER Published Admission Number – one off)
Barr's Hill (30)
Westwood Academy (30)
Ernesford Grange (20)

2021/22
Temporary: (Taking OVER Published Admission Number – one off)
Caludon Castle (30)
Ernesford Grange (30)
Stoke Park (20)

Permanent: (Increasing Published Admission Number)
Blue Coat (30)
Finham Park (30)
Caludon Castle (30)
Foxyford (30)
Option 3

**2019/20**

*Temporary: (Taking OVER Published Admission Number – one off)*
- Sidney Stringer (30)
- Foxford (5)
- Lyng Hall (30)
- Coundon Court (30)
- Caludon Castle (10)

*Permanent: (Increasing Published Admission Number)*
- Coundon Court (30)
- President Kennedy (30)
- Cardinal Newman (30)
- Caludon Castle (30)
- Whitley (20)

**2020/21**

*Temporary: (Taking OVER Published Admission Number – one off)*
- President Kennedy (30)
- Whitley Academy (10)

**2021/22**

*Temporary: (Taking OVER Published Admission Number – one off)*
- Coundon Castle (30)
- Westwood Academy (30)

*Permanent: (Increasing Published Admission Number)*
- Barr’s Hill (30)
- Finham Park (30)
- Ernesford Grange (30)
- Coundon Court (30)
Option 4

2019/20
Temporary: (Taking OVER Published Admission Number – one off)
Sidney Stringer (30)
Foford (5)
Lyn Hall (30)
Coundon Court (30)
Caludon Castle (10)

Permanent: (Increasing Published Admission Number)
Coundon Court (60)
Cardinal Newman (60)
Whitley (20)

2020/21
Temporary: (Taking OVER Published Admission Number – one off)
Finham 2 (30)
Stoke Park (10)

2021/22
Temporary: (Taking OVER Published Admission Number – one off)
Stoke Park (30)
Ernesford Grange (30)

Permanent: (Increasing Published Admission Number)
Barr’s Hill (60)
President Kennedy (60)
### Agenda Item 8

**CONFERENCES/SEMINARS**  
**AUTHORITY FOR ATTENDANCE**

This form to be used for Councillors (for attendance both in and outside the U.K.) and for employees (outside the U.K. only or, if accompanying a Councillor, inside the UK)

<p>| | |</p>
<table>
<thead>
<tr>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>1. Title of Conference</strong></td>
<td>Commemoration Events and International Congress on Cultures of Remembrance in Dresden</td>
</tr>
<tr>
<td><strong>2. Organising Body</strong></td>
<td>City of Dresden</td>
</tr>
<tr>
<td><strong>3. Location</strong></td>
<td>Dresden, Germany</td>
</tr>
<tr>
<td><strong>4. Date(s)</strong></td>
<td>12th – 15th February 2020</td>
</tr>
</tbody>
</table>
| **5. Councillor(s) recommended to attend** | Lord Mayor, Councillor L Bigham  
Deputy Leader, Councillor A S Khan |
| **6. Employee(s) recommended to attend** | Manager of Members Services |
| **7. **Cost per person, including travel, etc**  
(Note: If total cost is less than £100, formal Cabinet/Cabinet Member approval is not required)** | Return airfare costs (as at time of completing form)  
+ £250 Economy Class per person  
+ £200 Currency for incidentals  
The City of Dresden will provide accommodation, meals, and transport. |
| **8. Is participation at this event as part of a group** | Yes |
| **9. If so, how many people IN TOTAL will be attending the event as part of that group** | 5 |
| **10. Is there anyone travelling with the Member, officer or group in relation to whom any of the costs of travel, accommodation or any other expense will be paid for by a Member or officer. If "YES" please state number.** | Yes – Mr Kerry Bigham, Lord Mayor’s Consort |
| **11. Source of Funding (FIS Code)** | Lord Mayor’s Hospitality Budget – 10660 |
12. What are the reasons for attendance and what benefits to the City Council are expected from attendance

Coventry has been twinned with Dresden since 1958 – a long and very established twinning link. For many years there have been exchange visits between the two cities.

An invitation has been received from Dresden to attend events associated with the 75th anniversary of the bombing of Dresden in the Second World War.

One of the main events is the International Congress on Culture of Remembrance, which takes place from 12th to 15th February. At this event, the Lord Mayor has been asked to make an active contribution and take part in discussions on the 14th February entitled "Working towards a peaceful future through co-operation and friendship – how history strengthened the bonds between Dresden and its partner cities".

13. Is this conference part of an overall project involving further visits in the future?

NO

14. Recommendation of Cabinet Member/Cabinet/Chair of any other City Council Committee

YES/NO

(a) Are you satisfied that there is a genuine reason for attendance and genuine benefit for the Council?

YES/NO

(b) Will Councillor attendance affect the decision-making processes of the Council?

YES/NO

(c) Is attendance recommended?

YES/NO

Signed: [Signature]
Date: [Date]

15. Cabinet Member's recommendation

YES/NÓ

Signed: [Signature]
Date: [Date]

16. Leader's recommendation

YES/NÓ

Signed: [Signature]
Date: [Date]
| 17. Person responsible for booking conference following approval of attendance | Name: Julie Wheeler, Member Services Manager  
Place Directorate  
Telephone No: 024 7697 1619 |
|---|---|
| Decision  
APPROVED / NOT APPROVED | Cabinet Member/Cabinet  
Date: |
| Notification to:  
(a) Officer responsible for booking conference  
(b) Councillor attending  
(c) Member of Management Board  
(d) Members' Services  
(e) Committee Officer | YES/NO  
DATE |
| Date report back obtained |  |
| Date of meeting of Scrutiny to receive report back |  |