

**Time and Date**

2.00 pm on Tuesday, 11th October, 2022

Place

Council Chamber - Council House

Public Business**1. Apologies****2. Declarations of Interest****3. Minutes** (Pages 5 - 18)

- (a) To agree the minutes from the meeting of Cabinet on 30 August, 2022
- (b) Matters arising

4. Exclusion of Press and Public

To consider whether to exclude the press and public for the item(s) of private business for the reasons shown in the report(s).

5. Transfer of Charitable Trust Funds (Pages 19 - 26)

Report of the Director of Law and Governance

6. Adult Social Care Report 2012/22 (Pages 27 - 88)

Report of the Director of Adult Services and Housing

NOTE: A briefing note containing recommendations from the Health and Social Care Scrutiny Board (5) is appended at page 87

7. Youth Justice Plan 2021/23 Update (Pages 89 - 170)

Report of the Director of Children's Services

8. Economic Development Strategy (Pages 171 - 204)

Report of the Director of Business, Investment and Culture

NOTE: A briefing note containing recommendations from the Scrutiny Co-ordination Committee is appended at page 203

9. **Coventry Skills Strategy** (Pages 205 - 308)
Report of the Director of Education and Skills

NOTE: A briefing note containing recommendations from the Scrutiny Co-ordination Committee is appended at page 307
10. **Review of Policy on Enforcement in the Private Rented Sector** (Pages 309 - 422)
Report of the Director of Streetscene and Regulatory Services
11. **Family Hub and Best Start for Life Programme** (Pages 423 - 434)
Report of the Director of Children's Services
12. **Request for Approval of Acceptance of Funding Received from the Department of Education to Implement 'Staying Close' Provision for our Care Leavers** (Pages 435 - 442)
Report of the Director of Children's Services
13. **Capital Scheme for Children's Home Offering Same Day/Short-Term Placements** (Pages 443 - 456)
Report of the Director of Children's Services
14. **Social Care Reforms: Fair Cost of Care** (Pages 457 - 478)
Report of the Director of Adult Services and Housing
15. **Loan for Material Recycling Facility** (Pages 479 - 490)
Report of the Managing Director for Coventry Municipal Holding Limited and the Chief Operating Officer
16. **Outstanding Issues**
There are no outstanding issues
17. **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

18. **Capital Scheme for Children's Home Offering Same Day/Short-Term Placements** (Pages 491 - 504)
Report of the Director of Children's Services

(Listing Officer: A Whitrick, email: angela.whitrick@coventry.gov.uk)

19. **Social Care Reforms: Fair Cost of Care** (Pages 505 - 544)
Report of the Director of Adult Services and Housing
(Listing Officer: P Fahy, email pete.fahy@coventry.gov.uk)
20. **Loan for Material Recycling Facility** (Pages 545 - 598)
Report of the Managing Director for Coventry Municipal Holding Limited and the Chief Operating Officer
(Listing Officer: P Mudhar – email: parminder.mudhar@coventry.gov.uk)
21. **Any other items of private business which the Chair decides to take as a matter of urgency because of the special circumstances involved.**

Julie Newman, Director of Law and Governance, Council House, Coventry

Monday, 3 October 2022

Note: The person to contact about the agenda and documents for this meeting is Lara Knight, Governance Services, Email: michelle.salmon@coventry.gov.uk

Membership

Cabinet Members:

Councillors R Brown, K Caan, G Duggins (Chair), P Hetherton, A S Khan (Deputy Chair), M Mutton, J O'Boyle, K Sandhu, P Seaman and D Welsh

Non-voting Deputy Cabinet Members:

Councillors P Akhtar, B Gittins, G Hayre, G Lloyd and S Nazir

By invitation:

Councillors P Male and G Ridley (Non-voting Opposition representatives)

Public Access

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Lara Knight, Governance Services

Email: michelle.salmon@coventry.gov.uk

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Coventry City Council
Minutes of the Meeting of Cabinet held at 2.00 pm on Tuesday, 30 August 2022

Present:	Councillor G Duggins (Chair) Councillor AS Khan (Deputy Chair) Councillor P Hetherton Councillor M Mutton Councillor J O'Boyle Councillor P Seaman Councillor D Welsh
Non-Voting Deputy Cabinet Members:	Councillor P Akhtar Councillor G Lloyd Councillor S Nazir
Non-Voting Opposition Members:	Councillor P Male Councillor R Simpson (substitute for Councillor G Ridley)
Other Members:	Councillor R Auluck Councillor R Singh Councillor R Lakha

Employees (by Service):

Chief Executive	M Reeves (Chief Executive)
Education and Skills	R Sugars, C Whiteley
Finance	P Jennings
Law and Governance	J Newman (Chief Legal Officer, O Aremu, S Bennett)
Public Health and Wellbeing	A Duggal (Director), S Lam
Streetscene and Regulatory Services	D Butler
Transportation and Highways	C Knight (Director), R Palmer
Apologies:	Councillors N Akhtar, L Bigham, R Brown, K Caan, B Gittins, G Hayre, G Ridley, K Sandhu

Public Business

15. Declarations of Interest

There were no disclosable pecuniary interests.

16. **Minutes**

The Minutes of the meeting held on 12 July, 2022 were agreed and signed as a true record.

There were no matters arising.

17. **One Coventry Plan Annual Performance Report 2021-22**

The Cabinet considered a report of the Chief Executive which indicated that the One Coventry Plan sets out the Council's shared vision and priorities for Coventry. The Annual Performance Report, which was appended to the report, details performance towards priorities between April 2021 and March 2022. The One Coventry Plan is currently being refreshed. The report sets out performance towards the current One Coventry performance metrics, but also includes the emerging metrics to provide a baseline for the new One Coventry Plan. As before, for each of the priorities the report sets out the trends, actions taken and performance metrics to provide an assessment of the progress made against previous years and with other places.

The report highlights Coventry's year in the spotlight at UK City of Culture, which has happened during a period of continued significant national and international challenges, including Covid-19 pandemic related issues and the worst escalation in hostilities in Europe since 1991 with Russia's war on Ukraine, which is one of the reasons behind the rapid rise in the cost of living. The impact of this cost of living crisis on communities is yet to be fully realised, as people right across the City face rapidly rising energy, fuel, food and housing costs. The report highlighted the One Coventry approach, with the Council, partner organisations and community groups right across the City responding to the twin challenges of the Covid -19 pandemic and the cost of living crisis, taking on additional duties. The report also indicated that there will continue to be more indirect impacts as residents and communities who previously have never needed local authority support face difficulties.

The One Coventry Plan 2016-2024 is measured using 75 metrics, of which 32 metrics improved; 8 stayed the same; 18 got worse; can't say for 10 metrics; and progress is not available for the remaining 7 metrics. This means, 69% (40/58) of directional metrics (excluding cannot say or not available) improved or stayed the same. As with last year, several metrics are not available this year because there is limited data on school performance because of exam cancellations last summer.

Many of the Council's key priorities have an equality dimension or address an inequality caused by economic or social circumstances. Consequently, the report also sets out how the Council addresses these equality and health inequalities and also includes emerging metrics against the proposed new One Coventry Plan 2022-2030. Where available, the report detailed the current performance and the direction of travel for those metrics over the past year. This is intended to establish a baseline for comparison in future years.

Scrutiny Co-ordination Committee considered the report at their meeting on 20 July, 2022 (their Minute 9/22 refers) and a Briefing Note was appended to the

report detailing their consideration of this item. Cabinet noted that the One Coventry Plan had been updated to reflect the Committee's recommendations in relation to some of the data contained in the Plan. The Committee had made the following Recommendation:-

- 1) That the spend on agency staff be reviewed and officers be asked to explore the viability of creating an income generating Coventry City Council employment agency

RESOLVED that Cabinet:-

- 1) **Approve the Recommendation outlined above in relation to the spend on agency staff and the exploration of the viability of creating an income generating Coventry City Council employment agency.**
- 2) **Approve the One Coventry Plan Annual Performance Report 2021-22.**

18. **2022/23 First Quarter Financial Monitoring Report (to June 2022)**

The Cabinet considered a report of the Chief Operating Officer (Section 151 Officer) which outlined the forecast outturn position for revenue and capital expenditure and the Council's treasury management activity as at the end of June 2022. The headline revenue forecast for 2022/23 is for net expenditure to be £9.5m over budget. At the same point in 2021/22 there was a projected overspend (after the application of COVID-19 emergency funding) of £4.0m.

The report indicated that the Council continues to face budget pressures due to increased volumes and higher costs of placements within Children's Services and costs incurred due to the refuse drivers' industrial dispute within Streetscene and Regulatory Services. A range of other smaller but still significant overspends are also being reported in several other services including Legal and Governance Services and Business, Investment and Culture.

In a worrying emerging development, significant additional costs are also being faced due to inflationary pressures affecting the Council, with an anticipated above budget pay award and costs affecting contracts for energy and social care amongst others. The in-year and ongoing impact of these inflationary pressures is a serious new cause for concern in terms of the Council's ability to manage its budgetary position.

The Council's capital spending is projected to be £165.6m and includes major schemes progressing across the city. The size of the programme and the nature of the projects within it continue to be fundamental to the Council's role within the city. It is too early to have a clear view of the impact of the inflationary pressures referenced above on capital projects. The assumption is that stand-alone projects that are already in-progress will be delivered as planned but that future projects that have not yet started may need to be re-evaluated to determine their deliverability within previously defined financial budgets.

Following a report to Cabinet on 11 January 2022 in relation to a proposed Home for Disabled Children, (Minutes 63 and 68/21 refer), revised plans and a new

external funding solution have been identified. The initial proposal was to refurbish a Council building (Logan Road) to create a residential home for looked after children with disabilities within the city for £1m. Unfortunately, the Council was unsuccessful in securing the match funding grant from the DfE and the detailed refurbishment costs for Logan Road came back significantly over £1.5m, higher than the original quote. It has since been identified that the business case for building a new home to meet this need, instead of the refurbishment, will deliver better outcomes for children, is more cost effective and allows the Council to meet priorities surrounding its Green Futures Agenda. It has also been determined that the cost of this new build (£1.4m) can be met from the wider Disabled Facilities Grant allocation which the Council receives annually from Government. This report sought approval for the revised scheme, additional cost and new funding source, details of which were contained in the report. The proposals are fundamentally consistent with the original report

The Council's services have moved to a business as usual position with activity and impacts arising from the Covid pandemic having reduced significantly. Some pockets of service activity continue to be affected but this is not resulting in a large financial cost. The Council does not expect to receive any Government support linked to Covid within the 2022/23 financial year.

The emerging inflationary risks facing the Council and the wider local government sector have renewed the imperative to maintain financial discipline and prioritise the Council's medium-term financial position. This will become a familiar theme over the remainder of the year and will be a key focus of the Council's activities.

Cabinet noted that the report will be considered by the Audit and Procurement Committee at their meeting on 26 September, 2022.

RESOLVED that the Cabinet:-

- 1) Approves the Council's revenue monitoring position.**
- 2) Approves the revised forecast capital outturn position for the year of £165.6m incorporating: £33.9m rescheduling from 2021/22 outturn, £6.7m net increase in spending relating to approved/technical changes and £20.1m of net rescheduling of expenditure into future years.**
- 3) Approves a revised proposal for a new-build residential home for children with disabilities instead of refurbishing Logan Road and to utilise Disabled Facilities Grant to fund the increased £1.4m capital costs as set out in paragraph 2.4 of the report.**

19. Modernising Sexual Health Services

The Cabinet considered a report of the Chief Partnership Officer which indicated that the Health and Social Care Act 2012 places a duty on local authorities to provide open access services for contraception and for prevention, testing and treatment of sexually transmitted infections (STIs) for their residents. This is mandatory and entails the key principles of providing services that are free, confidential, open access and not restricted by age. The term 'open access' refers

to services being available to anyone requiring testing for sexually transmitted infections and subsequent treatment (not including HIV treatment), irrespective of their personal characteristics, place of residence, GP registration or immigration status, and without referral.

The Integrated Sexual Health (ISH) Service in Coventry is currently delivered by Coventry and Warwickshire NHS Partnership Trust (CWPT) and is based on a hub and spoke model, with the hub in the City of Coventry Health Centre. The service provides clinic-based interventions and sub-contracts GPs and pharmacies to provide contraceptive (emergency contraception, long-acting reversible contraception and condom distribution) and sexual health services (chlamydia screening) within community settings. The cost of all testing and drug treatments is included within the contract. Currently, online and pharmacy HIV testing services are commissioned outside of the main contract for ISH.

The current contract commenced in 2015 and integrated a number of separate contraception and STI services. The service was jointly procured between Coventry City Council and NHS England (NHSE), who are responsible for commissioning HIV treatment, to enable a more effective patient pathway from HIV testing into treatment. The current contract was due to expire on 31 March 2023 but has been extended to 31 March 2024 in order to allow for the procurement proposed in the report to take place.

Similar services are currently commissioned jointly by Warwickshire County Council (WCC) and NHSE, with the contract delivered by George Eliot NHS Trust and some direct locally enhanced services in primary care.

It is proposed that the service is re-procured by the City Council jointly with Warwickshire County Council and NHSE to deliver both ISH and HIV treatment services within an integrated model, providing efficiency and a smooth patient journey from HIV testing to treatment. The recommended approach is that, following appointment of a provider via a joint procurement process, the Councils will hold a single contract for sexual health service provision and NHSE will hold a second, separate, contract for HIV treatment to ensure contract management remains within specialist teams. Warwickshire County Council will operate as contract holder for sexual health service provision and Coventry City Council will have third party rights. A supporting contract will be drawn up between Coventry City Council and Warwickshire County Council to clarify roles, risk sharing and liabilities and a joint overseeing board will be established involving Directors of Public Health from each local authority.

The report included details of the proposed procurement process to respond to needs assessment and a description of key service priorities, including a focus on community outreach and engagement to support the reduction of sexual health inequalities.

Procurement Board has agreed that each party's financial contribution to the contract be proportionate to the level of patient engagement within current services and that, therefore, the maximum financial contributions for the annual value of the contract will be:

Financial envelope – all scope £7,743.017		
	WCC contribution	CCC contribution
Proportionate	53.7%	46.3%
Value of proportionate	£4,158,000	£3,585,017

In order to support a stable health system, it is intended that the contract for sexual health services is for an initial 5 year term, with the option to extend for a further 5 years.

RESOLVED that the Cabinet:-

- 1) **Approves the commencement of a competitive procurement tender exercise for the provision of Sexual Health Services jointly with Warwickshire County Council and NHS England.**
- 2) **Notes that the current contract with Coventry and Warwickshire NHS Partnership Trust has been varied for a further 12-month term until 31 March 2024 in order to facilitate the tendering exercise of the new service.**
- 3) **Approves proposals to recommission the service for a period of five years with the option to extend for up to a further five years, making the total potential contract length 10 years.**
- 4) **Delegates authority to the Director of Public Health and Wellbeing, following consultation with the Chief Legal Officer and the Cabinet Member for Public Health and Sport :**
 - a) **To award a contract for the provision of Sexual Health Services to the successful provider; and**
 - b) **To finalise the terms of, and enter into, the relevant legal agreements as well as any associated documents deemed necessary to enter into the contract.**

20. **City Region Sustainable Transport Settlement**

The Cabinet considered a report of the Director of Transportation and Highways which indicated that the Council's transport capital programme has secured a further £115.9 million, which takes the total investment in Coventry's transport network to just over £250 million for the next 5 years. This enables the Council to further its reputation as an innovative city and to tackle corporate priorities – including tackling the causes of climate change. The report sought approval to enable the funding to be drawn down and the schemes designed and delivered.

As reported to Cabinet on 15 March 2022, (Minute 89/21 refers) the West Midlands Combined Authority (WMCA) submitted a bid to Government's City Region Sustainable Transport Settlement (CRSTS) for a £1.05 billion package of transport schemes for the period 2022-27. The Department for Transport (DfT)

has subsequently confirmed the CRSTS funding award for the WMCA. For Coventry this includes the following:

- Coventry Very Light Rail (CVLR) - £54 million
- Coventry South Sustainable Transport Package - £17 million
- Foleshill Transport Package - £4.5 million
- Regional Park and Ride including Tile Hill Station - £4.5 million

The £80 million CRSTS capital investment will be supplemented by up to £23 million match funding which is a mix of public and private sector investment, taking the total programme value to £103m for the 4 schemes. The majority of match funding is already secure and has been previously approved by Cabinet, and was detailed in the report.

In addition, £30.6 million funding is allocated within the five-year CRSTS programme for Highway Maintenance and the Local Network Improvement Plan.

The WMCA is the accountable body for the CRSTS funding and has put in place a Single Assurance Framework (SAF) process that will need to be followed to draw down the funding. This requires the preparation and submission of business cases that will require WMCA approval.

Due to the scale, and innovative nature, of the project, the CVLR scheme has been designated a retained scheme, which means that the DfT will need to approve the business case in addition to the WMCA.

The Highways Maintenance and Local Network Improvement Plan funding allocation is not subject to the SAF process and is being allocated direct to the Council.

In addition to the CRSTS funding, the Council has recently been successful in securing £5.3 million additional funding for cycling and walking improvements from two additional sources:

- Active Travel Fund 3 – the Binley Cycle Route has received an additional £2.7 million Active Travel funding, taking the total scheme funding to £8.6 million. WMCA has allocated a further £1 million for two Active Travel Neighbourhoods, in the Earlsdon and Naul's Mill areas of the city.
- Paths for Everyone - £1.63 million has been awarded from this fund, administered by Sustrans for the DfT, for improvements to the National Cycle Network routes linking to the University of Warwick campus.

The WMCA has also been awarded revenue funding through CRSTS for scheme development. The Council has already been awarded £0.6 million from this award, and it is anticipated that further revenue funding will be made available during 2022/23. This funding is intended to assist with the cost of developing a pipeline of new schemes that can come forward as and when additional funding becomes available. This also helps to create contingency in the event that any schemes in the CRSTS programme are delayed.

In total, this represents additional investment of almost £116 million in the City's transport network over the 2022-27 period, alongside already committed funding on projects including the Local Air Quality Action Plan and the Active Travel Programme. In order to deliver this ambitious programme, the Council is proposing to use a procurement compliant framework in order to procure professional consultancy services, whilst bespoke procurement frameworks are likely to be required for the CVLR project, given its' innovative nature, alongside a framework for construction under the wider capital programme.

RESOLVED:-

- 1) That the Cabinet delegates authority to the Chief Legal Officer and the Director of Transportation and Highways, following consultation with the Cabinet Member for Jobs, Regeneration and Climate Change, to agree the most appropriate procurement route for the works to be delivered for CRSTS Programme and wider Transport Capital Programme related works, subject to approval by Procurement Board.**

- 2) That the Cabinet recommends that the City Council:-**
 - i. Approves the submission of Business Cases to the WMCA and, in the case of CVLR, to the DfT, to secure CRSTS funding and delegates authority to the Chief Legal Officer, Chief Operating Officer and the Director of Transportation and Highways, following consultation with the Cabinet Member for Jobs, Regeneration and Climate Change, to accept the CRSTS £80 million funding and add to the Council's Transport Capital Programme.**

 - ii. Retrospectively approves the award of £2.7 million Active Travel Fund for Binley Cycle Route, £1 million Active Travel Neighbourhood and £1.63 million Sustrans 'Paths for Everyone' Funding and approve the addition of this funding to the Council's Transport Capital Programme.**

 - iii. Delegates authority to the Chief Legal Officer and the Director of Transportation and Highways following consultation with the Cabinet Member for Jobs, Regeneration and Climate Change, to finalise the terms of, and enter into, the relevant legal agreements as well as any associated documents deemed necessary to complete the projects relating the CRSTS Funding up to £80 million, Active Travel Fund £2.7 million for Binley Cycle Route, Active Travel Neighbourhood £1 million and £1.63 million Sustrans 'Paths for Everyone' Funding, including any match funding which is not yet secure up to the amount of £5 million.**

 - iv. Delegates authority to the Director of Transportation and Highways following consultation with the Cabinet Member for Jobs, Regeneration and Climate Change, to approve the programme of public consultation and engagement and works to be undertaken for the Council's Transport Capital Programme, including the CRSTS projects.**

- v. **Delegates authority to the Director of Transport and Highways following consultation with Cabinet Member for Jobs, Regeneration and Climate Change and the Cabinet Member for City Services, to approve the programme of works and public consultation and engagement to be undertaken for the Active Travel Neighbourhood schemes.**

21. **Schools National Funding Formula Consultation Response**

The Cabinet considered a report of the Director of Education and Skills which indicated that the Department for Education (DfE) is consulting on further reforms to the National Funding Formula (NFF) which determines funding allocations for Local Authorities (LAs) and for all schools.

The Council has previously set out that it does not agree with the move towards a nationally determined funding formula. LAs have knowledge of local factors and understand the context of the local requirements of schools and therefore are best placed to distribute funding in the most effective way for the children in their authorities. However, the DfE has made clear this is the national policy direction and it is therefore in the Council's best interest to continue to engage with these consultations in order to influence the final outcomes for the benefit of the Council and Coventry schools.

The proposals cover a range of specific school funding areas with the main theme of implementing a direct National Funding Formula, where the DfE would calculate and allocate funding directly to schools without local intervention. Some of the proposed changes are planned to take effect from 2023-24 but the DfE anticipate full implementation of the direct NFF will take until 2027-28.

The majority of the consultation proposals are not yet fully developed and as such it is not possible to be specific about their direct impact at this stage. However, the proposals do reveal a likely direction of travel on some key issues, and the potential impact that these could have on both Council and school finances is detailed within the report.

The report sought approval to submit a Local Authority (LA) response to the consultation which outlines Coventry City Council's view on the proposals, as detailed in an Appendix to the report. The response clearly highlights the Council's concerns about changes which could negatively impact on the LA or on schools. Where appropriate the response also outlines areas that need further consideration and makes suggestions to improve proposals.

RESOLVED that Council be recommended to approve the proposed response to the Schools National Funding Formula consultation, as appended to the report.

22. **Conservation Area Designation - Earlsdon**

The Cabinet considered a report of the Director of Streetscene and Regulatory Services which indicated that, in line with Local Plan commitments, the proposal for a new Conservation Area in Earlsdon has been assessed, with a draft area

appraisal, management plan and associated Article 4 Direction produced and taken to public consultation. All comments received have been reviewed and appropriate changes made. The report sought endorsement of the designation of the proposed Earlsdon Conservation Area in order to preserve and enhance the special character of the area. The report will be considered by Planning Committee for final approval.

Coventry currently has 16 designated Conservation Areas, each individually recognising areas of special architectural, environmental or historic interest in the city. The Planning (Listed Buildings and Conservation Areas) Act 1990 states at section 69 'Designation of Conservation Areas' that, "Every local planning authority shall from time to time determine which parts of their area are areas of special architectural or historic interest the character or appearance of which it is desirable to preserve or enhance, and shall designate those areas as conservation areas".

Within Conservation Areas, certain additional planning controls apply which seek to assist the Local Planning Authority in protecting the special characteristics of the conservation areas. The Local Authority also have the option of considering the introduction of associated Article 4 Directions, which then remove targeted elements of permitted development rights in order that proposals which may impact upon the special character of the conservation area may be assessed for their appropriateness through the planning system.

Following its adoption in December 2017, the Coventry City Local Plan states at policy HE2 that the areas of Earlsdon and Brownhill Green are proposed for new Conservation Areas. Work has now been undertaken to assess these areas, producing supporting documentation of an area appraisal, management plan and Article 4 Direction (Minute 23/22 below also refers)

Following approval from the Cabinet Member for Housing and Communities, (Minute 37/22 refers), public consultation on the proposals has now taken place. The findings, officers' responses to points raised and revisions to the documentation that has taken place in response were summarised in an Appendix to the report. Alongside considerations of representations received through the public consultation phase, further engagement with internal colleagues has also take place and revisions made accordingly in order to ensure that the documents may be employed to their best effect in forthcoming planning considerations.

RESOLVED that Cabinet endorses the report and the designation of a new Conservation Area in Earlsdon.

23. Conservation Area Designation - Brownhill Green

The Cabinet considered a report of the Director of Streetscene and Regulatory Services which indicated that, in line with Local Plan commitments, the proposal for a new Conservation Area in Brownhill Green has been assessed, with a draft area appraisal, management plan and associated Article 4 Direction produced and taken to public consultation. All comments received have been reviewed and appropriate changes made. The report sought endorsement of the designation of the proposed Brownhill Green Conservation Area in order to preserve and

enhance the special character of the area. The report will be considered by Planning Committee for final approval.

Coventry currently has 16 designated Conservation Areas, each individually recognising areas of special architectural, environmental or historic interest in the city. The Planning (Listed Buildings and Conservation Areas) Act 1990 states at section 69 'Designation of Conservation Areas' that, "Every local planning authority shall from time to time determine which parts of their area are areas of special architectural or historic interest the character or appearance of which it is desirable to preserve or enhance, and shall designate those areas as conservation areas".

Within Conservation Areas, certain additional planning controls apply which seek to assist the Local Planning Authority in protecting the special characteristics of the conservation areas. The Local Authority also have the option of considering the introduction of associated Article 4 Directions, which then remove targeted elements of permitted development rights in order that proposals which may impact upon the special character of the conservation area may be assessed for their appropriateness through the planning system.

Following its adoption in December 2017, the Coventry City Local Plan states at policy HE2 that the areas of Earlsdon and Brownhill Green are proposed for new Conservation Areas. Work has now been undertaken to assess these areas, producing supporting documentation of an area appraisal, management plan and Article 4 Direction (Minute 22/22 above also refers)

Following approval from the Cabinet Member for Housing and Communities, (Minute 36/22 refers), public consultation on the proposals has now taken place. The findings, officers' responses to points raised and revisions to the documentation that has taken place in response were summarised in an Appendix to the report. Alongside considerations of representations received through the public consultation phase, further engagement with internal colleagues has also take place and revisions made accordingly in order to ensure that the documents may be employed to their best effect in forthcoming planning considerations.

RESOLVED that Cabinet endorses the report and the designation of a new Conservation Area in Brownhill Green.

24. **Houses of Multiple Occupancy (HMO) Development Plan Document (DPD) Public Consultation**

The Cabinet considered a report of the Director of Streetscene and Regulatory Services which indicated that Houses in Multiple Occupancy (HMOs) can provide entry level accommodation but can also bring significant disruption to settled neighbourhoods. In order to ensure that HMOs can only come forward in ways that integrate with existing neighbourhoods, a Development Plan Document (DPD) has been drafted that identifies the key issues and proposes planning policy responses.

Furthermore, in order to ensure that these policies can be engaged comprehensively, an Article 4 Direction is proposed on the wards most impacted by HMOs currently, and those most likely to be in the future.

The report sought authority to consult for an eight-week period on the draft HMO DPD and associated Article 4 Direction. The proposed consultation will be a "Regulation 18" consultation, where the public are asked to consider the issues identified and provide their views on whether any issues have been overlooked. The Council will then propose policy responses to the identified issues, and again ask members of the public for their views on these policies.

In order to make sure that this change of policy can be applied to all HMOs, a draft Article 4 Direction is also proposed and was attached as a Appendix 4 to the report. It is proposed to consult on this at the same time as the HMO DPD, acknowledging that many consultees will want to comment on both simultaneously.

In drawing the boundaries of the Article 4 Direction area officers have been cognisant of the requirements of the National Planning Policy Framework (NPPF) paragraph 53 for making sure the area is as based on robust evidence and applies to the smallest geographical area possible, whilst also considering the likely impacts on similar dwelling typologies. As such the area is drawn to cover all major clusters of existing HMOs and the areas where there is further HMO growth potential and will be supported by a technical evidence document.

When consulting on a draft Article 4 Direction, the date that the Direction will come into force, if ratified by the Council, is required to be stated. This date has been set one year from the date of consultation to ensure that it is brought into effect as soon as possible but without creating potential compensation liability for the Authority.

It is also a legal requirement, as set out in the Environmental Assessment of Plans and Programmes Regulations 2004 (SEA Regulations), to consider whether or not Strategic Environmental Assessment (SEA) of the DPD should be undertaken. The process for determining whether or not an SEA is required is called screening. This is to determine whether a plan will have significant environmental effects. The screening opinion undertaken was attached at Appendix 2 to the report. This concludes that no SEA is needed for the DPD. This screening report must be consulted on so that three statutory bodies (Historic England, Natural England and the Environment Agency) can respond. It makes sense to make the screening report publicly available for comment at the same time as the DPD is being consulted on.

An Equalities Impact Assessment (EqIA) has been undertaken, this was attached at Appendix 3 to the report and will also form part of the public consultation.

Following the eight week consultation, responses will be analysed and taken account of when considering amendments that might be required. A further report will be considered by Cabinet and Council to approve a second round of consultation prior to submission for Independent Examination.

RESOLVED that Cabinet;

- 1) Notes the content of the appendices and the timeline indicated in the report**

- 2) **On behalf of the Local Planning Authority, authorises the City Solicitor to make a non immediate Article 4 Direction which will be applied to the areas defined in the Draft Article 4 Direction shown at Appendix 4 of this report to remove permitted development rights for the change of use of dwelling houses (C3 use) to small houses in multiple occupation (C4 use)**
- 3) **Recommends that Council approves the draft documents for an eight week public consultation, to begin at the earliest opportunity**

25. **Conservation Covenant - Responsible Body Nomination**

The Cabinet considered a report of the Director of Streetscene and Regulatory Services which indicated that Conservation Covenants are a new way of securing long term environmental benefits on land via a legally binding agreement between the landowner and a Responsible Body. This report seeks approval to nominate the City Council as a Responsible Body in order to have the opportunity to enter into such agreements in the future where appropriate.

The Environment Act 2021 introduced the concept of Conservation Covenants. A Conservation Covenant is a legally binding agreement between a landowner and a Responsible Body that commits the land to specific restrictions over a long time period, potentially in perpetuity, irrespective of successor ownership.

Conservation Covenants are expected to become a useful tool in securing long term biodiversity gain either in tandem with or replacing Section 106 agreements where related to delivering offsite biodiversity improvements as a result of planning applications. It should be noted that the Council will still expect all biodiversity improvements to take place on-site wherever possible.

In September 2022 the Department for Environment, Food and Rural Affairs (DEFRA) are opening applications for organisations to apply to become a Responsible Body. Although Local Authorities are not required to apply, it is the expectation that most LAs will do so. Multiple Responsible Bodies can cover the same geographical area. By nominating ourselves as a Responsible Body the Council does not commit to entering into any individual agreements, but does commit to submitting an annual report on the number of Covenants entered into. There is little information on this at present but the Secretary of State may make regulations in the future providing for how annual returns are to be made.

It was noted that the Council cannot enter into a Covenant with itself on land in its ownership.

By becoming a Responsible Body, the Council will safeguard the ability to use this function in the future. The Government has yet to provide detailed guidance regarding the use of Conservation Covenants, but it is considered prudent to ensure the Council is in a position to take advantage of this function in the future, where it is considered the most appropriate and effective vehicle to deliver the Council's aims.

RESOLVED that Cabinet approves the nomination of the City Council as a Responsible Body with regards to Conservation Covenants.

26. **Outstanding Issues**

There were no outstanding issues.

27. **Any Other Items of Urgent Public Business**

There were no other items of urgent public business.

(Meeting closed at 3.15 pm)



Cabinet

11th October 2022

Name of Cabinet Member:

Cabinet Member for Housing & Communities – Councillor David Welsh

Director Approving Submission of the report:

City Solicitor and Monitoring Officer

Ward(s) affected:

All

Title:

Transfer of Charitable Trust Funds

Is this a key decision?

No - although the proposals affect more than two electoral wards, the impact is not expected to be significant.

Executive Summary:

The Council acts as trustee for a number of charitable funds operating in and around the City, with varying numbers of charitable trustees appointed and different degrees of control. Many of these are active and effective in utilising their assets and delivering their charitable objectives, however others have limited or no activity. Following a review of the charities, this report now seeks to transfer those charitable funds into a Coventry established fund which will be managed by Heart of England Community Foundation and utilised for the benefit of the residents of Coventry.

Recommendations:

Cabinet is requested to:

1. Approve the transfer of 3 Charitable Trust Funds as detailed in Appendix 1, subject where necessary to the agreement of the Charity Commission and other trustees, to the Heart of England Community Foundation (HOECF).
2. Agree, the setup of a Coventry Trust managed by the HOECF to serve the residents of the City with the following charitable objectives:
 - Projects benefitting children and young people
 - Projects to support the welfare of older people
 - Projects that support general community/cultural/sporting activity

3. Agree that (to the extent necessary) the Monitoring Officer be authorised to:
 - (a) support the charitable trustee complete the necessary and legal processes including but not limited to the making of the necessary resolutions; and
 - (b) send a copy of these resolutions to the Charity Commission to progress the transfer.

List of Appendices included:

Appendix 1: Proposed Charitable Funds

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?

No

Will this report go to Council?

No

1. Context (or background)

1.1 The Council is associated with a number of charitable funds operating in and around the City, with varying numbers of charitable trustees appointed and different degrees of control. Many of these are active and effective in utilising their assets and delivering their charitable objectives, however others have limited or no activity or may have historical objectives which have now been superseded.

2. Options considered and recommended proposal

2.1 Option 1: Do nothing

The selected charities could continue to remain as they are, which whilst continuing to benefit from any assets invested, would provide limited or no benefit to intended recipients and would continue to incur the administrative costs associated with trustee and officer time in adhering to charitable requirements.

2.2 Option 2: Transfer Charitable Funds into a Coventry Fund managed by Heart of England Community Foundation (recommended)

The Charity Commission is keen to see the release of funds from dormant and frustrated trust funds locked in small charities around the country and works to release these funds to charitable bodies such as Heart of England Community Foundation (HOECF). HOECF approached the council and offered to take over inactive/ineffective charities and to set up a Community Fund for Coventry from any assets transferred. They already manage 45 charitable trusts and have setup similar funds with other Councils in a similar position. Once the fund is set up, other charitable funds can be transferred into it and the new fund can be grown with other charitable resources.

3. Results of consultation undertaken

Each charity has a charitable deed document which details the Governance required to manage the charity in question and outlines the requirements of trustees and decision making. For each of the charities included in the proposal, the trustees (both internal and where applicable, external) have had the opportunity to meet HOECF and discuss the proposal. Trustees will be required to approve the transfer (make a resolution) in line with the charitable deeds.

4. Timetable for implementing this decision

Due to the nature of the work, it is difficult to say how long it will take to complete actions arising from this report. If the proposal is supported, officers will work with Heart of England Community Foundation and the Charities Commission to enact the transfer at the earliest opportunity.

5. Comments from Director of Finance and Director of Law and Governance

5.1 Financial implications

The charities have assets as outlined in Appendix 1 of the report. If the transfer is approved, these assets will be transferred into the new Community Fund for Coventry managed by Heart of England Community Foundation.

There will be no direct financial implications to the Council as the charitable assets are held in the name of the charities and are separate to Council assets. There will be a small saving to the Council relating to the officer time involved in administering the charities.

Heart of England Community Foundation will charge the Fund an annual fee to cover administration costs which will be met from the investment income generated.

5.2 Legal implications

This report comes to Cabinet as the Council is the trustee of the charitable funds described (also with external trustees where identified). The recommendations proposed reflect the requirements of the Charities Act 2011. Although the resolution made by the Trustees of the various charities named in Appendix 1 need to follow their own governing documents to make the resolution, the actual transfer of funds outlined is a transfer under legislative powers as opposed to under the charity's governing documents.

Sections 267-272 of the Charities Act 2011 offer a means by which the assets of unincorporated charities, such as trust funds and bequests, can be released to another charity to be applied in more appropriate and effective ways. This power can be used where the unincorporated charity's gross income is less than £10k in the last financial year and it does not hold land to be used for a specific purpose.

Sections 267-272 can be applied to the charities identified at Appendix 1, and in respect of those charities, it is proposed that the Trustees resolve that they should be freed from any restrictions that apply to the expenditure of capital on the basis that, in each case, the income of the trust is insufficient to serve the purposes of the trust. Subject thereto, it is also proposed that all the assets of those charities should then be transferred to HOECF for the purposes of HOECF.

It should be noted that the Trustees can only agree to a transfer under section 268 if it satisfied both that it is expedient in the interests of furthering the purposes for which the trust was established for the assets to be transferred to HOECF and that the purposes of HOECF are broadly in line with the original objectives of the trust funds being transferred.

The objects of the HOECF are "The promotion of any charitable purpose or the benefit of the community in the City of Coventry, the County of Warwickshire and elsewhere in the United Kingdom. And in particular the advancement of education, the protection of good health both mental and physical and the relief of poverty and sickness, and any other exclusively charitable purposes which are in the opinion of the Trustees beneficial to the community in the area of benefit".

Coventry is covered by the area of benefit and the objects of HOECF are aligned with that of the original objectives of the trust funds named at Appendix 1. To give effect to its decision and to ensure the benefit of the funds reach the area they currently serve, it is proposed that the Council as Trustee will require that HOECF set up a specific Coventry Trust to manage the transferred funds.

The proposed transfer is also in keeping with the Charity Commission's wider strategy. The Charity Commission published guidance in 2019 to encourage dormant charities to either close and transfer their assets or to change their purposes and operate more effectively. The Charity Commission has identified that £20m is being held in dormant charitable trusts, which could be redirected within the sector.

6. Other implications

Any other specific implications

6.1 How will this contribute to the Council Plan (www.coventry.gov.uk/councilplan/)?

This proposal seeks to make the most of assets available to support residents in the city, working with a charitable partner to deliver it.

6.2 How is risk being managed?

There are limited risks associated with the proposal. Transfer of the resources will be governed by the requirements of the specific charitable deeds as well as requirements of the Charity Commission. If anything is later identified during the process of transfer that prevent an individual charity transferring, then it can be removed from the process at the relevant stage.

6.3 What is the impact on the organisation?

As highlighted in the financial implications there will be a small saving in time generated as the various charities involved generate annual administrative processes.

6.4 Equality Impact Assessment (EIA)

There are no direct impacts on protected groups associated with this proposal. HOECF strive to be an equitable, diverse and inclusive funder, and evaluate their grant making, benchmark against protected characteristics and ensure the decisions they take are informed by intelligence.

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

None

6.6 Implications for partner organisations?

Creation of the Coventry Fund will enable HOECF to provide financial support to other organisations in the city which in turn support local residents.

Report author(s):

Name and job title:

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Contributor/approver name	Title	Service Area	Date doc sent out	Date response received or approved
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Sarah Harriott	Corporate Governance Solicitor	Law and Governance	30/05/2022	30/05/2022
Names of approvers for submission: (officers and members)				
Barry Hastie	Chief Operating Officer (Section 151 Officer)	Finance	08/09/2022	22/09/2022
Oluremi Aremu	Head of Legal and Procurement Services	Law and Governance	08/09/2022	16/09/2022
Julie Newman	City Solicitor & Monitoring Officer	Law and Governance	30/05/2022	31/05/2022
Councillor D Welsh	Cabinet Member for Housing & Communities		12/09/2022	14/09/2022

This report is published on the council's website:

www.coventry.gov.uk/councilmeetings

Appendix 1 – Charities proposed to transfer to Coventry Fund

Name of Charity	Charity Number	Investment Held	Value of investments	Valuation Date* (latest statement)	Trustee Information
Tansley Charity Trust	505364	<p><u>Charity Funds</u> Treasurers Account Cash on Deposit with CCC</p> <p><u>Charity Investments</u> Blackrock Charity Investments CCLA Charity Investments</p> <p>The above investments generate circa £4,600 of income per annum</p>	<p>£43,109 £5,750</p> <p>£46,599 £95,340</p>	<p>31/05/22</p> <p>30/06/22 30/06/22</p>	Council & External
Doctor William MacDonald of Johannesburg Trust	225876	<p><u>Charity Funds</u> Treasurers Account Cash on Deposit with CCC</p> <p><u>Charity Investments</u> CCLA Charity Investments</p> <p>The above investments generate circa £3,700 of income per annum</p>	<p>£10,857 £2,000</p> <p>£123,024</p>	<p>31/05/22</p> <p>30/06/22</p>	Council only
The John Friends Memorial Fund	702700	<p><u>Charity Funds</u> Treasurers Account</p> <p><u>Charity Investments</u> CCLA Charity Investments</p> <p>The above investments generate circa £2,300 of income per annum</p>	<p>£22,692</p> <p>£78,993</p>	<p>28/02/22</p> <p>30/06/22</p>	Council only

*Differing valuation/balance dates relate to when statements are issued. Due to the limited number of transactions some are only issued annually. These balances will also be impacted by any outstanding transactions up to the date of any approved transfer.

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Health and Social Care Scrutiny Board (5)
Cabinet

14 September 2022
11 October 2022

Name of Cabinet Member:

Cabinet Member for Adult Services – Councillor M Mutton

Director Approving Submission of the Report:

Director of Adult Services and Housing

Ward(s) affected:

All

Title:

Adult Social Care Annual Report 2021/22 (Local Account)

Is this a key decision?

No -

This is a report of performance for 2021/22 and no recommendations are made that have significant financial or service implications.

Executive Summary:

The Adult Social Care Annual Report (also referred to as the Local Account) describes the performance of Adult Social Care and the progress made against the priorities for the year. It also provides specific examples of operational activities to support service users and carers.

Although there is not a statutory requirement to produce an annual report, it is considered good practice as it provides an opportunity to be open and transparent about the successes and challenges facing Adult Social Care and to show what is being done to improve outcomes for those that come into contact with our services. The production of an annual report is part of the Local Government Association's (LGA) approach to Sector Led Improvement. This approach was launched following the removal of national targets and assessments for Adult Social Care. This assessment framework is changing and from April 2023 Adult Social Care will be subject to oversight by the Care Quality Commission (CQC).

The production of the 2021/22 report has drawn on the pool of feedback and information that was gathered over the year from a range of sources including social care staff, Partnership Boards, Adult Social Care Stakeholder Group, providers, partner organisations and people that have been in contact with Adult Social Care along with their families and carers. It reflects the performance and activities as we emerged from the COVID-19 pandemic and the end of domestic restrictions.

The Local Account also looks forward to 2022/23 and includes summary details regarding key areas for development. These are improvements the service intends to make in order to improve service delivery, improve outcomes for people and support our ability to operate within the

resources available. The priority is to improve care and support services for adults and to create a stable provider market for the City.

Recommendations:

1. Health and Social Care Scrutiny Board (5) is asked to:
 - 1) Consider the report and submit any comments to Cabinet for their consideration on the content of the report
2. Cabinet is asked to:
 - 1) Consider comments from the Health and Social Care Scrutiny Board (5)
 - 2) Approve the Adult Social Care Annual Report 2021/22 (Local Account)

List of Appendices included:

Appendix One - Adult Social Care Annual Report 2021/22 (Local Account)

Background papers:

None

Other useful documents:

None

Has it been or will it be considered by Scrutiny?

Yes – Health and Social Care Scrutiny Board (5) on 14 September 2022.

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

Report title: Adult Social Care Annual Report 2021/22 (Local Account)

1. Context (or background)

- 1.1. The Local Government Association (LGA) launched its approach to Sector Led Improvement in 2011. This approach was introduced following the removal of national targets and assessments with the aim of driving improvement through self-regulation, improvement and innovation. As part of this approach to Sector Led Improvement the expectation is that an Annual Report is produced by all local authorities with Adult Social Care responsibilities. The production of an Annual Report is not a statutory requirement, nor has any statutory guidance been issued on its content or style. The oversight of Adult Social Care is however changing Local Authority Adult Social Care functions by the Care Quality Commission (CQC) from April 2023. The detail of this oversight is not yet available so the future expectations for Annual Reports may change part of this.
- 1.2. The Annual Report describes the performance and achievements along with considering the challenges for Adult Social Care in Coventry. It is intended to provide assurance to stakeholders that Adult Social Care is delivering its objectives and is achieving positive outcomes for people in Coventry within the resources available.
- 1.3. The content of the Annual Report is informed by feedback on the experiences of people who come into contact with Adult Social Care, this feedback may be given in person, through groups or in response to surveys. A number of more specific case studies and direct quotes have been used to demonstrate the impact that Adult Social Care has on individuals and their families. Those who have commented on previous reports have consistently stated that case studies are an important aspect of the report, as they help to demonstrate outcomes for individuals and the difference it has made to their lives.
- 1.4. In June 2021/22 we produced a 'Coventry Adult Social Care Offer' which is a clear statement explaining our vision and objectives, aligned to the Council's One Coventry Plan ambitions. It has been developed as a way of setting out how we do things in Coventry including a description of what people can expect when they contact us, how they can participate in our work and useful links to information and advice. This year's Annual Report has been framed around our commitments we have made in the Offer about what people can expect from Adult Social Care.
- 1.5. Although an Annual Report is produced for a 12-month period it needs to be recognised that the work of Adult Social Care does not fit neatly within a twelve-month timeframe and delivery of the Adult Social Care objective of promoting independence and providing personalised care and support is very much an ongoing endeavour.
- 1.6. The Annual Report reflects on the work during the financial year (April 2021 to March 2022) which included a continued impact of the COVID-19 pandemic. A year in which Adult Social Care needed to respond to national restrictions, vaccination requirements and continue to refine a blend of the use of technology with face-to-face work.
- 1.7. As we moved into 2022/23 we started to see demand for Adult Social Care increase and the return to pre pandemic levels and above with potential additional pressures associated with the detrimental impact of social isolation on mental health, wellbeing and social skills. We also experienced people presenting to us with higher levels of need and approaching social

care at a later stage than they would normally. We also know that unpaid carers have seen their caring roles intensify and have been placed under increased pressures during the last year which has had an impact on the emotional and physical health of carers across the City.

- 1.8. The year 2021/22 also saw the publication of Government proposals for Adult Social Care reform. These included;
- 1.9.
 - 'Build Back Better' plan for Health and Social Care
 - 'People at the Heart of Care: adult social care reform' White Paper
 - Health and Care Act 2022 (which received Royal Assent in April 2022)
 - White Paper on integration of Health and care
 - Consultation on Liberty Protection Safeguards (due to replace Deprivation of Liberty Safeguards DoLS)
- 1.10 Together proposals introduce major reforms to Adult Social Care with measures including further integration with health care, a cap on social care costs and charging thresholds for charging, an intervention in the social care market intended to ensure local authorities move towards payment of a 'fair price' for care and the Care Quality Commission (CQC) being responsible for assessing Local Authorities' delivery of their adult social care functions. Delivering against this reform agenda will form a significant part of our programme of work for the next couple of years.
- 1.11 Although the challenges presented by COVID-19 and Adult Social Care reforms, now and into the future, are significant they are not the only challenges we face and some of the other key challenges we are continuing to address include:
 - Increasing demand for services resulting from an ageing population. In the decade to 2029, the City should expect to have an additional 8,900 people aged over 65 and an additional 2,000 people aged over 85. This group of people are more likely to live with multiple health conditions that require support.
 - Increasing numbers of adults with mental illness accessing long term support (with an additional impact due to COVID-19).
 - Increasing costs of care due to external factors including National Living Wage, inflation increases to employer pension contributions, other inflation costs, the increased complexity of the care needs that people are experiencing as well as increased infection control costs.
 - Challenges to maintaining sufficiency and quality of the adult social care market especially given the impact of COVID-19 on the sustainability of some provision.
- 1.12. The production of the 2021/22 Annual Report has drawn on the pool of feedback and information gathered over the year from a range of sources including social care staff, Partnership Boards, Adult Social Care Stakeholder Group, providers, partner organisations and people that have been in contact with Adult Social Care, along with their families and carers. Particular feedback to note includes:
 - Our work with Ahmed (page 21 of the Annual Report) to ensure his home was accessible to meet his needs demonstrating how we use adaptations and grants to enable disabled people to have access in and around their home.

- Our work with Ian (page 29 of the Annual Report) demonstrating how we work with people experiencing safeguarding concerns and challenging living circumstances to find more suitable accommodation with a clear focus on what's important to the person.
- 1.13 It is also important to recognise that although our focus is on Adult Social Care our success is increasingly intertwined with health services. Although Adult Social Care has a distinct identity, so much of what we do is achieved through working with others. New partnerships 'Integrated Care Systems' (ICS) are bringing together; Acute, Community Health Trusts, GPs, Primary Care services with Local Authorities and other care providers. These aim to bring organisations together to redesign, improve support and outcomes for residents.
- 1.14. The environment in which Social Care operates is changing, what has not changed is the core purpose of Adult Social Care in supporting people to achieve their outcomes and to live as independently as possible. Therefore, when looking forward and considering our future priorities, we are conscious of the impact of the changing environment while remaining committed to our core purpose.
- 1.15. Recognising the changing environment, we are focussing our improvement work for the next year on three areas: reforms, partnerships and internal improvement. The key elements of each of these areas are summarised below
- **Adult Social Care Reform.** This will include acting in accordance with Government requirements to move towards a Fair Cost of Care and to develop and utilise a Market Sustainability Plan by February 2023. The implementation of a cap on social care costs, implementation of new charging thresholds and a revised Charging Policy to be in place by October 2023. Continuing to prepare for the implementation of Liberty Protection Safeguards (replacing the Deprivation of Liberty Safeguards) at a date to be confirmed by the Government.
 - **Adult Social Care Improvement.** This will include a focus on developing and supporting our internal workforce. Supporting our residents by reviewing our service levels and customer standards in order to provide clarity on what people can expect from Adult Social Care when contacting us and receiving support. Undertaking community engagement events to raise awareness of Adult Social Care, including specifically within hard-to-reach communities. Ensuring the Adult Social Care Offer is accessible to all, redesigning the way we share information on our webpages and expanding the ways we engage on and coproduce our services.
 - **Adult Social Care Partnerships.** This will include continuing to build relationships with partner agencies. Working jointly with Coventry and Warwickshire Partnership Trust NHS Trust (CWPT) within the Section 75 Agreement. Working in partnership with health and voluntary sector organisations to implement the 'Improving Lives for Older People' programme to support older people in living independent lives in good health in Coventry. Using new joined up records to deliver, better, safer, and more timely care and support to people through the Integrated Care Record. Continuing to work in partnership with the voluntary sector and community groups to improve the support available locally to adults.

2. Options considered and recommended proposal

- 2.1 An Annual Report provides the opportunity to evidence and communicate Adult Social Care's performance in an accessible and transparent way as part of an overall approach to Sector Led Improvement. It is therefore recommended that the Annual Report for 2021/22 is approved by the Cabinet.

3. Results of Consultation undertaken

- 3.1 Although the Annual Report for 2021/22 was not subject to specific consultation, the content has been drawn from feedback gathered from people who come into contact with Adult Social Care together with comments from other partner organisations and stakeholders in the City. The case studies contained therein are real stories provided with the consent of those involved.

4. Timetable for implementing this decision

- 4.1. Once approved, the Annual Report will be published on the Council's internet pages and shared with partners and stakeholders.

5. Comments from the Chief Operating Officer (Section 151 Officer) and the Director of Law and Governance

5.1. Financial implications

Whilst there are no direct financial implications arising from the production of the report, the performance of Adult Social Care continues to be impacted by changes to Council resources and national legislation changes.

The report highlights £110.4m of Adult Social Care Spend in 2021/22 compared to spend of £103.2m in 2020/21, with the increase largely driven by additional resources provided to the care market in response to the Pandemic. This increase has been resourced from additional Council investment in Adult Social Care identified in the Budget report as well as extra grant resources received from Government during the pandemic.

5.2. Legal implications

There are no direct legal implications arising from the publication of the Annual Report.

The publication of the report is in accordance with the 2011 Department of Health recommendation that all local authorities' Adult Social Care directorates publish an Annual Report. This shows how the Local Authority performed against quality standards, and what plans have been agreed with local people for the future. The proposals for change as set out in the Health and Care Act 2022, referenced above, reinstating the inspection by CQC of a local authority's performance of its social care functions, are yet to be implemented and further details, including formal Guidance, are awaited.

6. Other Implications

6.1. How will this contribute to the Council's Plan (www.coventry.gov.uk/councilplan/)?

This Annual Report demonstrates the progress of Adult Social Care in maintaining and improving outcomes for the population of Coventry. This progress contributes to the Council's

objectives of citizens living longer, healthier, independent lives and contributes to the priorities in the Council Plan to protect the City's most vulnerable people.

6.2. How is risk being managed?

A range of risks exist in the delivery of Adult Social Care services, most notably related to resources and our ability to meet demand. These are managed through the directorate and corporate risk registers.

6.3. What is the impact on the organisation?

There is no direct impact on the organisation.

6.4. Equality and Consultation Analysis (ECA)

An Equalities Impact Assessment is not appropriate for this report. There has been a continued drive to embed equality and diversity within operational practice, commissioning plans and performance monitoring.

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

None

6.6. Implications for partner organisations?

There are no specific impacts for partner organisations arising from this report at this point but as the work of Adult Social Care is connected to health organisations and the voluntary and community sector as we seek to improve impacts may be experienced. The Annual Report provides an overview of Adult Social Care's performance and provides assurance to partners that progress is being made.

Report author(s):

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Lisa Lawson	Adult Services Programme Delivery Manager	Adult Services	15.08.22	23.08.22
Lara Knight	Governance Services Officer	Law and Governance	15.08.22	01.09.22
Sally Caren	Head of Adult Social Care and Support	Adult Services	15.08.22	15.08.22
Tracey Denny	Head of Service Localities and Social Care Operations	Adult Services	15.08.22	24.08.22
Aideen Staunton	Acting Head of Service Partnerships and Social Care Operations	Adult Services	15.08.22	23.08.22
Louise Ferro	Head of Business Systems	Adult Services	15.08.22	25.08.22
Jon Reading	Head of Commissioning and Quality	Adult Services	15.08.22	24.08.22
Ewan Dewar	Finance Manager	Financial Management	15.08.22	22.08.22
Names of approvers for submission: (Officers and Members)				
Pete Fahy	Director of Adult Services and Housing		15.08.22	30.08.22
Barry Hastie	Chief Operating Officer		30.08.22	31.08.22
Janice White	Team Leader, Legal Services	Law and Governance	15.08.22	23.08.22
Councillor M Mutton	Cabinet Member for Adult Services		23.08.22	23.08.22

This report is published on the Council's website: www.coventry.gov.uk/councilmeetings

Adult Social Care Annual Report 2021/22

(Local Account)



People's Stories

**Our Adult Social
Care Offer**

Our Key Achievements





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What is the Local Account?

Every year Coventry City Council produces a report which describes what Adult Social Care service is doing to help improve the lives of vulnerable people and how well as a service it is performing along with areas where we seeking to improve further. This report is usually referred to as the 'Local Account' but is also referred to as the 'Annual Report' for Adult Social Care.

We hope you find this account interesting and that it provides you with an insight into Adult Social Care in Coventry and the work that is being done to support improvements.



"Our success in achieving the vision for Coventry depends on placing adults and carers at the heart of everything we do. We will ensure people we work with are involved as equal partners in planning and decision making".

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Adult Social Care 2021/22 Key Changes

We could not write a Local Account reflecting back on 2021/22 without mentioning the continued impact Coronavirus (COVID-19) has had on the work of Adult Social Care and how we needed to respond to national restrictions, vaccination requirements and continue to refine a blend of the use of technology with face-to-face work.

2021/22 also saw the publication of Government proposals for Adult Social Care reform.

These included;

- **'Build Back Better' plan for health and social care**
- **People at the Heart of Care: Adult Social Care reform White Paper**
- **Health and Care Act 2022 (which received Royal Assent in April 2022)**
- **White Paper on integration of health and social care**
- **Consultation on Liberty Protection Safeguards (due to replace Deprivation of Liberty Safeguards DoLS)**

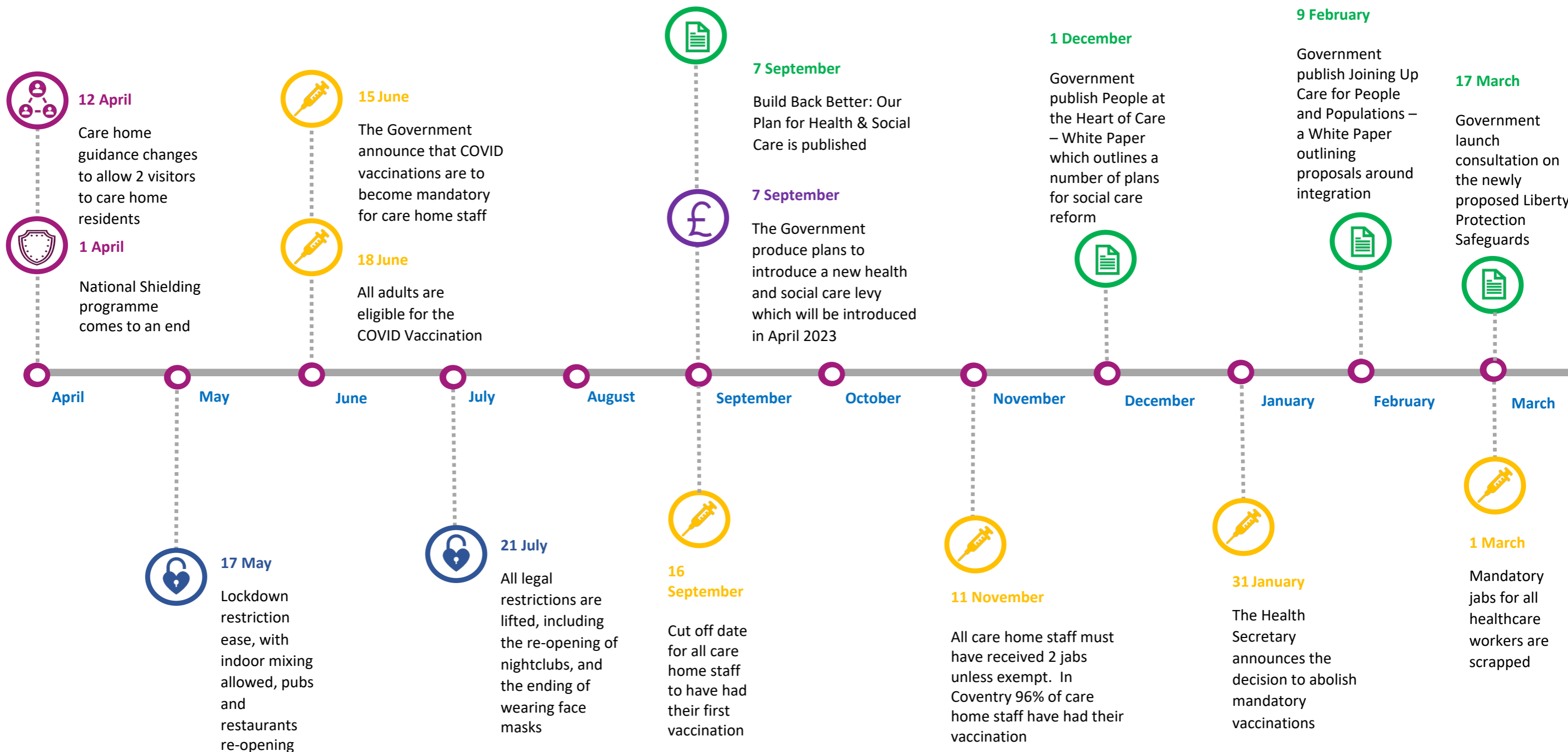
Together, these introduce major reforms to Adult Social Care, with measures including further integration with health care, a cap on social care costs, changing charging thresholds, an intervention in the social care market intended to ensure local authorities pay a 'fair price' for care and the Care Quality Commission (CQC) being responsible for assessing Local Authorities' delivery of their adult social care functions. These reforms will impact on the work of Adult Social Care over the years to come.



THE Botanists

A Year in the Life of Adult Social Care – 2021/22

We start the year still in lockdown measures. On 8 March 2021 care home residents can have one nominated visitor.





Pete Fahy

Director of Adult Services and Housing

The production of this Annual Report remains an important part of the annual cycle of Adult Social Care. It provides an opportunity for reflection on the progress we have made and challenges we face in delivering Adult Social Care within the city.

The year this report covers, 2021/2022, a year that remained overshadowed by the continuing COVID-19 pandemic, but also one where we were able to undertake much more in person work than the previous year. Speaking to people, understanding their circumstances and finding ways to support them is at the core of what we do and simply cannot be done as effectively through windows and on screens.

In our performance data we see the impact of the pandemic, there are less people satisfied with social care. This is most likely as a result of the restricted manner in which we have had to operate during periods of the pandemic. Understanding more about customer experience and how this can improve is increasingly important to us.

Each year this Annual Report includes a number of examples of the experiences of real people who we have supported – these examples are both powerful testimony to the impact that social care has on peoples lives and the positive work we do. They add a richness and honesty to what could otherwise become a raft of data and performance information.

As we now look ahead to 2023 and the challenges of future years it is right to remind ourselves of the huge reform agenda facing social care.

In October 2022 we are required to produce our Fair Cost of Care calculations and by February 2023 we are required to finalise a Market Sustainability Plan as part of the introduction of a Fair Cost of Care. Then in April 2023 there is the introduction of oversight and assurance for social care by the Care Quality Commission (CQC) to be followed by a series of financial reforms taking effect in October 2023 including the introduction of the care cap and changing financial thresholds. Alongside these reforms will be the introduction of Liberty Protection Safeguards and the Mental Health Act changes. All of these are a ‘must do’ and will form a large part of our programme of work for the next couple of years.

Regardless of what lies ahead, due to the people I work with and the commitment they show I remain certain that we will rise to the challenges and remain immensely proud and privileged to be the Director of Adult Social Care for Coventry City Council.

I hope you find this Annual Report informative and as always myself and my team are happy for any feedback.

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Mal Mutton

Cabinet Member for Adult Services

This is the third year I have had the pleasure of contributing to the Adult Social Care Annual Report and it is amazing to see the consistently highest standards of services being delivered with such a huge commitment and dedication from the workforce and partner organisations across the city.

Whilst many of us may be starting to feel that life is returning to some form of normality the challenges faced by some of the most vulnerable adults living in the city continue. We have seen increased demand upon Adult Social Care and the need for services to adapt and develop in order to meet demand has never been greater.

The report highlights some of the ways in which services are making real impact upon lives and the feedback and reflections of those people receiving services included within the report say it all!

I know there are far too many examples of individuals, teams and services to include all of the good work being undertaken every day

across Adult Social Care but I do hope you find the report highlights well the wide range of support and services provided.

I want to give my own personal thanks for the hard work, resilience, compassion and dedication demonstrated consistently by our wonderful social care workforce. I am confident that they will continue to rise to the challenges ahead and support the delivery of the forthcoming Adult Social Care reforms with their usual professionalism and commitment.

Please do get in touch if you would like to offer any feedback on the Annual Report by emailing getinvolvedasc@coventry.gov.uk



Introduction to Adult Social Care



The delivery of Adult Social Care is the responsibility of the Local Authority which interacts with a range of other local authority functions to support people in our communities, including Housing, Public Health, Children's Services or Culture and Leisure to name but a view. Our work is also closely connected to health organisations and the voluntary and third sector who work with many of the same people who come into contact with Adult Social Care.

Although Adult Social Care has a distinct identity, much of what we do is achieved through working with others. Our success is increasingly intertwined with our health partners. New partnerships 'Integrated Care Systems' (ICS) are bringing together; Acute Trusts, Community Health Trusts, GPs, Primary Care services with Local Authorities and other care providers. These aim to bring organisations together to redesign, improve support and outcomes for residents.

Adult Social Care in Coventry is one of several health and care organisations across Coventry and Warwickshire, making up the Coventry and Warwickshire Health and Care Partnership. This Partnership is working to improve the health and wellbeing of our residents. In all our efforts to achieve this we share a common vision:

'We will do everything in our power to enable people across Coventry and Warwickshire to pursue happy, healthy lives and put people at the heart of everything we do.'

In working to this vision, we believe that all our residents deserve to:

1. **LEAD** a healthy, independent and fulfilled life
2. **BE PART** of a strong community
3. **EXPERIENCE** effective and sustainable health and care services

As part of this Partnership, NHS Coventry and Warwickshire Integrated Care Board is now responsible for commissioning health and care services on behalf of people in Coventry and Warwickshire (this replaces Clinical Commissioning Groups).

www.happyhealthylives.uk/integrated-care-board/

From an Adult Social Care perspective, we do not have a complex strategy but at every level, we intend to provide support to the residents of Coventry, in the least intrusive manner possible, based on the assets, resources and abilities available to them. Our focus is on the promotion of independence, and this continues to be the at the heart of the way we work and provide support. Progressing this overarching objective is delivered day in, day out through the many interactions between our staff and people with care and support needs and through a series of developments and future planning overseen by the Director of Adult Services aimed at constantly improving what we do.

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During the last year we have made significant progress in our plans for the future including;

Improving access to support

Expectations are changing and for many the provision of day centre-based support should be complemented with the opportunity to undertake activities, with support, outside of a centre environment. An informal engagement exercise with stakeholders and a focus group from Alzheimer's Society co designed the vision for the Coventry Dementia Hub and subsequently permission was granted to commence a formal public consultation on the proposal to redevelop Maymorn Day Centre into a single Dementia Hub for Coventry. The proposals for the creation of a Coventry Dementia Hub, resulted in strong support for the new model, plans are progressing and formal Cabinet approval for the Hub is expected to be received in September 2022 with the opening of the hub predicted for April 2023.

Use of technology

Our use of technology to support our assessment activity has grown significantly. We have introduced a new animated self-assessment process so people can identify what they understand to be their own needs prior to an assessment. Furthermore, through the use of a digital dictation tool staff can now create documents of any length and and share them directly from a mobile device (usually a mobile phone). Both these innovations are saving people time and reducing unnecessary delays.



Our Coventry Adult Social Offer

Adult Social Care supports people aged 18 and over who have care and support needs as a result of a disability or an illness. Support is also provided to carers who spend time providing necessary care to someone else. We continue to work in accordance with our primary legislation, the Care Act (2014) and the required changes to practice and policy set out by the Act.

In 2021/22 we produced a 'Coventry Adult Social Care Offer' which is a clear statement explaining our vision and objectives, aligned to the Council's One Coventry Plan ambitions. It has been developed as a way of setting out how we do things in Coventry including a description of what people can expect when they contact us, how they can participate in our work and useful links to information and advice.

www.coventry.gov.uk/ascoffer

The delivery of Adult Social Care in Coventry focuses on approaches that promote well-being and independence to prevent, reduce or delay the need for long term support and to enable people to achieve their outcomes. In performance terms this means that we would expect to see a relatively smaller number of people in receipt of ongoing social care, and where ongoing social care is required that this is mainly provided in people's own homes. We would also expect that the short-term services we have in place to enable people to be independent are successful in reducing demand for ongoing Adult Social Care.



Adult Social Care Offer – Coventry City Council

Our Health and Care Partnership Vision

We will do all we can to enable people across Coventry and Warwickshire to pursue happy, healthy lives and put people at the heart of everything we do.

How will we do this?

Our work in Adult Social Care, at every level, intends to provide support to the residents of Coventry, in the least intrusive manner possible, based on the assets, resources and abilities that are available to them.

Our commitments to people who need to access our services



Taking a strength-based approach

We are committed to enabling people to live as independently as possible, drawing on people's own strengths and doing the things that are important to them, making use of what's available in local communities.



Helping people to stay at home

We will look at how we can adapt people's homes and provide equipment or if unable to do so explore alternative accommodation to enable people to live an independent life more easily.



Living and ageing well

We will help people think about the support they need and plan for how they can live the best life possible both now and into older age. We will enable people to find solutions that work best for them.



Making the best use of resources

We will aim to provide the right amount of support to meet people's needs and outcomes. In providing appropriate support, we consider costs and will look at innovative ways to deliver care and support.



Joined up care and support

We will work closely within the Council and with different organisations, including the NHS, to support people to achieve what is important to them. We will work with organisations providing support to ensure safe and quality services.



Keeping people safe

We will help people stay well and safe from harm and abuse, working alongside other organisations when we need to, and supporting people to make their own choices.



Carers are at the heart of all we do

We recognise, value and support the vital role of unpaid carers and will support them in their caring role, as well as supporting them if their caring responsibilities change or end.



Committed workforce

We have a valued and respected Adult Social Care workforce and will support and develop our own and those of our partners, equipping them with the skills, knowledge and values to provide effective care and support.

For full details of Coventry's Adult Social Care Offer or to request information in another language or format please email getinvolvedasc@coventry.gov.uk

How does Adult Social Care work in Coventry*

By Phone

024 7683 3003

By Professional / Carer Referral

Online Referral

By Online Self-Assessment

Online Self-Assessment

Adult Social Care Direct

Customer Services will take any initial information regarding a referral, such as contact details, key information, and the reason for the referral. They may be able to provide signposting advice and information advice at this stage.

Initial Contact Team

The initial contact team complete a follow up call for any new referrals. They will gather more detailed information about the referral and will advise the next steps.

Duty Team

Support any incoming queries through Adult Social Care, for people that are in receipt of support.

Opal Equipment Services

Provides information and advice about equipment to enable people to manage everyday tasks and live at home safely.

Occupational Therapy

Provides advice and support about a range of possible solutions that may make everyday tasks easier for you. This could range from daily living equipment such as bathing aids to stair lifts and monitoring systems.

Telecare Services

The Telecare Team will look at whether telecare equipment, such as personal trigger alarm, movement detector or medication dispenser are required.

Short Term Support

Promoting Independence

The Promoting Independence (PI) Service works with older people and people with physical disabilities to develop their independence and daily living skills and develops a greater understanding of long term/ongoing care and support needs.

Promoting Independence – Learning Disabilities

A multi-disciplinary team that works with adults with learning disabilities and autism to promote independence. The team provide support such as travel training, occupational therapy and support to use assistive technology.

Long Term Support

Older Peoples Assessment and Case Management Team

Works with adults over 65, they will explore the provision of support such as home support, day opportunities, supported housing, respite, residential care.

All Age Disabilities Team (Transitions 18-25)

Support adults turning 18 (or about to turn 18) until age 26, they will explore the provision of support such as home support, day opportunities, supported housing, respite, residential care

All Age Disabilities Team 25+

Support adults aged 26 and above, they will explore the provision of support such as home support, day opportunities, supported housing, respite, residential care.

*This is the process for referrals received by City Council Customer Services not Mental Health and Hospital referral routes

Setting the Scene -

Adult Social Care in a Changing Landscape

The demand for Adult Social Care rises every year as people live longer and there are more people living longer with more complex needs.

The illustrations on the next few pages give you an indication of the position for Adult Social Care during 2021/22 in respect of;

- **Budget** – Money Matters
- **Activity** – Facts & Figures
- **Demographic** – The people who come to us for support

- **Our Workforce** - The people that provide support where required

The Council is a large organisation spending a net £252.8m on revenue activity during 2021/22.

The gross Adult Social Care Spend in 2021/22 minus citizens and other contributions was £110.4m as shown below. This includes £8.2m of additional resources provided to support the care market during the pandemic.

BUDGET-MONEY MATTERS

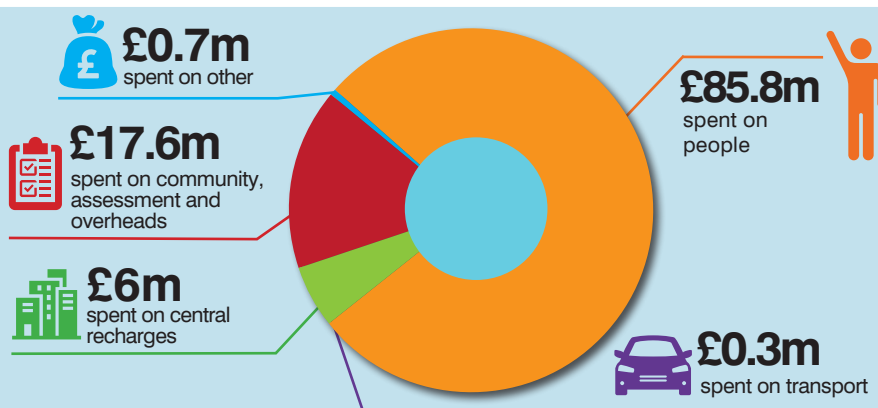
This compares to a spend of

£103.2m
in 2020/21



The largest element of the increase relates to Spend on People (provision of services)

2021/22 ADULT SOCIAL CARE SPEND (£110.4m)



BUDGET-MONEY MATTERS

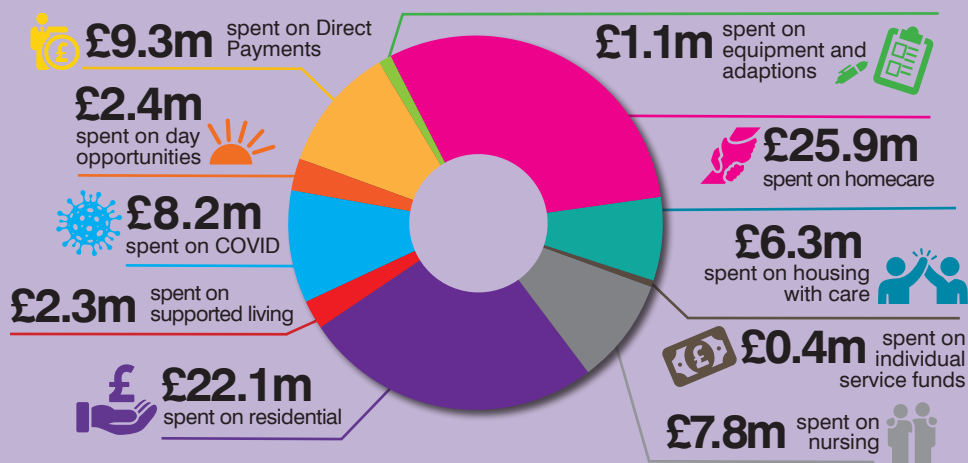
The 'Spend on People' referred to in the chart has increased from

£79.5m
in 2020/21



'Spend on People' is money spent directly on the following services

2021/22 SPEND ON PEOPLE (£85.8m)



BUDGET-MONEY MATTERS

Coventry still continues to be a comparatively low spending local authority per

100,000 population

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HOW DO WE COMPARE?

In recent years we know that Coventry demonstrates comparatively low spending as a local authority per **100,000 population**.

The Local Government Association publish information about spend later on in the year but you can view information for 2021/22 [here](#).

ACTIVITY FACTS AND FIGURES

COVID-19 and the country's response to the pandemic continued to impact on work of Adult Social Care during 2021/22, with national lockdowns and limited family contact impacted on the activity of Adult

Social Care, those accessing our support and how we needed to work. We are now starting to understand the long-term impact of the pandemic and are seeing more needs associated with mental health and wellbeing.

PEOPLE RECEIVING SUPPORT

Adult Social Care receive a large volume of requests for support on a day-to-day basis. Our aim is to maximise people's independence and support people in the least intrusive way.

11,316

new requests for support (an increase of 14% on last year's figure of 9,902)



6.5%

of requests resulted in a long-term service (increase on last year's 5%)



18%

received low level support (reduction on last year's 34%)



28%

received a short-term service to promote independence (decrease on last year's 30%)



4,546

people received long term support during the year (similar to last year's 4529)

people had been in long term support for over 12 months as at 31 March 2022



2,539

people received a planned or unplanned review throughout the year (compared to 1284 last year)



1,364

people transitioned from Children's Services to Adult Social Care compared to 23 last year



CARERS RECEIVING AN ASSESSMENT

Adult Social Care have an equal responsibility for anyone providing unpaid care within the city. Anyone providing necessary care to another adult is entitled to a carer's assessment.

1,211

carers had their needs assessed of which 335 received a separate assessment



1,364

carers received support

HOW DO WE COMPARE?

CQC Local Area Analysis data suggests in Coventry, compared to other local authorities that have similar populations, that we think of other solutions first, signposting to universal services and other community support rather than looking at traditional models of support. To explore the Local Area Analysis in more detail you can view the most recent reports from CQC [here](#).

In comparison to other local authorities Coventry continues to have;

Low rates of new requests for Adult Social Care, with an average of **31 a day** compared to the national average of **35 in 20/21**

Continued lower rate of people receiving long term support per **100,000 population** compared with our comparators

A lower rate of new requests for Adult Social Care support going straight into an ongoing long-term service than comparators

A higher proportion of new requests for **people aged 65+** going on to receive short term support to maximise independence than comparators

SAFEGUARDING

2021/22 Safeguarding Information

Protecting adults to live in safety, free from abuse and neglect is a core duty of Adult Social Care. The rising rate of safeguarding concerns reported suggests people know how to report abuse and we are addressing concerns without the need for an enquiry or investigation.

5,858 safeguarding concerns received, a **36% increase** from previous year (4,321)

899 safeguarding enquiries, an **82% increase** from the previous year (493)

15% the rate of concerns that led to an enquiry was up from 11% last year

869 completed safeguarding enquiries were undertaken in the year compared to 508 in the previous year

768 people (88%) were asked about their outcomes, an **increase from 83%** of people asked last year (423)

97% of people reported fully achieved/partially achieved outcomes compared to 94% last year

We continue to closely monitor our all activity and use 'sampling' audits and develop improvement plans when we need to look into our approaches in more depth.

HOW DO WE COMPARE?

Coventry has a higher rate of concerns per 100,000 population in 2021/22 (1962) compared to 2020/21 for England (1121) and West Midlands (1038). Coventry has a comparable number of enquiries started in 2021/22 (301) with England (343) and West Midlands (217) rates per population. The high number of concerns started compared to England and West Midlands has meant that Coventry's conversion rate (15%) is lower than England (34%) but comparable to the median West Midlands conversion rate (15%).

2021/22 comparator data is due to be published in November 2022 on the [NHS Digital Adult Social Care Analytical Hub](#).

DEPRIVATION OF LIBERTY SAFEGUARDS (DoLS)

The Deprivation of Liberty Safeguards (DoLS) are part of the Mental Capacity Act 2005. The safeguards aim to make sure that people in care homes and hospitals are looked after in a way that does not inappropriately restrict their freedom.

There has been a **14% (307)** increase in the number of applications

2,237 2020/21 **2,544** 2021/22

469 (18%) are in due process compared with **349 (16%)** in 2020/21

In **2021/22** there were **2,075** applications completed which is a 10% increase from

1,889 in 2021/22

There was an increase of applications granted after **6 months** of being received from **37 (4%)** in 2020/21 to **127 (14%)** in 2021/22

HOW DO WE COMPARE?

Comparator information will be published at the end of 2022 however we know last year, we saw a higher proportion of applications compared to other regions that Coventry share similarities with. And similarly, we completed a higher proportion of assessments than our comparators. Nationally local authorities completed on average 551 DoLS applications per 100,000 of the population in 2020/21 and in Coventry this figure was 695

Our work during year continued to be impacted as a result of the pandemic due to reduced staffing capacity and assessments taking longer to complete. Liberty Protection Safeguards are due to replace DOLs for which the service is actively preparing for.

DEMOGRAPHIC



Coventry's population is growing, changing and increasingly diverse



Coventry is home to **345,300** residents (census 2021)

14.6% of the population is 65+

2% of the population are aged 85 or over

Recent census information suggest that population growth has been lower than projected



but Coventry has a slightly faster rate of population growth than the West Midlands average of 6.2% and the England average of 6.6%



Life expectancy in Coventry remains consistently below England, but healthy life expectancy is similar to England

Health outcomes are worse in the most deprived areas, where people not only live shorter lives, but spend a bigger portion of their years in poor health, and are more likely to die of preventable causes



National data suggests that between 2015-2017 and 2017-2019, life expectancy between the richer and poorer increased further. In particular, there was a decrease in life expectancy for females in poorer areas - resulting in a widening of inequality in the life expectancy gap among females (7.4 years). Although, the gap for males (9.4 years) remains larger

Early mortality (<75 years) *Worse than national*



Cardiovascular	X	X
Cancer	X	X
Liver disease	X	
Respiratory diseases	X	X
Communicable diseases	X	X

OUR WORKFORCE

920

internal staff



81% Female staff



19% Male staff

Average age of workforce

48.2 YEARS

48.4% workforce aged over 50

73.1% workforce is white

Vacancy rate is

11.5% compared to **6%** nationally

20.6% of workforce is Black, Asian, Minority Ethnic

Leaver rate is **15.3%**



141 people

New starter rate is

14.7% **135** people



The wider Adult Social Care workforce in Coventry amounts to

9,500 jobs

which includes staff working in 181 CQC registered establishments

Key achievements - based on our Adult Social Care Offer

The previous section contained a volume of data and comparisons across a number of areas of performance. To summarise this as succinctly as possible would be to say that Coventry continues to support a relatively low number of people with ongoing care and support needs and as a result is a comparatively low spender on Adult Social Care.

This position has largely been arrived at by our approach to Adult Social Care and Support which is based on supporting people to be as independent as possible. Where independence

has been lost or reduced, we work with people to regain skills and where levels of independence have been limited, we work with people to improve this. Our goal is for people to be living independently within their own homes. This is not always achievable and in many cases living independently is only possible with support.

The examples below give a flavour of how we have delivered this approach. We have used real examples given with the consent of those involved.

1 Taking a strength-based approach

Promoting Strengths, Independence, Diversity and Inclusion in our Shared Lives Scheme - Saba's story

Shared Lives is the essence of family living; sharing a home, life and community with like-minded people. We pride ourselves on our rigorous matching and introduction process, ensuring the adults we support have the greatest opportunity of finding the right family, right home and support to lead a happy and fulfilling life whilst having their individual needs met. This

process cannot be successful without placing the adults we support at the heart of everything we do. Individuals living in Shared Lives are supported to express their wishes, explore their dreams, and share the highs and lows of living as part of a family. Here Saba shares her story in her own words about what it's like to be supported by the Scheme.

Hi I'm Saba

I moved to England in 2008 from Pakistan where I lived with my Grandparents and Uncle. When I moved to England, I was diagnosed with a Brain Tumour, I spent a lot of time in hospital meeting Nurses and Doctors and other children. I was taken into Foster Care in 2010, I was very unhappy during this time and struggled to settle in, I had different foster carers. In 2011 I met the perfect foster family; I now live with the family as part of Shared Lives and my younger sister lives with us too.

Shared Lives has made a massive difference to my life, now I am an adult I'm treated like an adult, Mandy and Mem are my shared Lives Carers, they support me with my independence and encourage me to do as much as I can. Mandy manages all my medical appointments and supports me with my health needs, but she has taught me about my medication and injections, I can now manage my own medication and do my own injections, I'm proud of this.





My biological family are so important to me, I love going to see my Mum and Dad, Mandy has always supported me with this, I can now do this on my own on the bus. My relationship with my Mum is so much better now, and we meet for drinks and go shopping together. I also like to go shopping on my own as I have the confidence to do this because Mandy has supported and encouraged me. As a Muslim I can celebrate my culture and all the festivals and events that are important to me, I share these with my Shared Lives family. Mandy always ensures I have Halal meat and we often cook traditional meals together.

What I like about living in Shared Lives is I can make some great memories, I have some lovely holidays with Mandy and Mem, we have been to Spain and Turkey, as well as short breaks to Butlins, I love going to amusement parks, although I don't like the fast rides.

I love living in Shared Lives, I have a great future to look forward to, I feel I am free to live my life and do what I want to do, I am looking forward to starting an apprenticeship in September, my aim is to find a job. Since coming into Shared Lives aged 18 years of age, I have had a financial appointee to manage my money, my aim is to manage my own finances which Mandy is supporting me to work towards, I feel confident I will be able to do this.

Another wish of mine is to return to Pakistan for a visit, I have been unable to do this because of the COVID-19 pandemic and my health needs, but this is something I plan to do in the future.

I love my life and wouldn't have it any other way.

www.coventry.gov.uk/sharedlives

Follow us on Twitter: @SharedLives18

Facebook: Shared Lives Coventry

Interested in becoming a Shared Lives Carer?

www.coventry.gov.uk/whybecomeasharedlivescarer



A room to spare
and a life to share

2 Helping people to stay at home

Ahmed – a home adapted to meet my needs

Ahmed is a 29-year-old young man with physical disabilities who lives with his parents. He and his family wanted safe and independent access to a sleeping area, toilet and showering facilities on the ground floor. His health conditions included respiratory failure, chronic back pain, weight problems and poor mobility. He was sleeping on a mattress in the lounge and was not able to get to the bathroom to use the toilet or shower; his mum was washing him on the mattress in the lounge. Although there were two reception rooms, Ahmed could not get into the second room due to the width of the doorways.

A request was sent in July 2021 by the Occupational Therapist (OT) for a joint visit to establish the best way of meeting his needs. Between the OT and the Housing Officer they identified that a Disabled Facilities Grant (DFG) could be provided to:

- Widen doorways to enable Ahmed to access the whole of the ground floor
- Alter the layout of the kitchen to enable him to pass through to the bathroom
- Bathroom alterations to remove the existing cubicle and provide a level-access shower
- Alterations to the back door so that Ahmed could go outside

The OT also arranged for a hospital bed to be provided so that Ahmed could sleep in a bed, not just a mattress. This also meant that he was able to get in and out of bed without his mum pulling him up from the floor.

Whilst carrying out her assessment, the OT noticed that the Ahmed's mother was also struggling with her mobility, so she was able to arrange for a stairlift to be fitted for her.

Nigel Goode, Home Improvements Officer, commented; *"In my role I am fortunate to be able to support people in ensuring their homes are adapted to meet their needs, it's a great pleasure and a true sense that we are helping people in our city. Ahmed's life changed when the work was completed, he was able to mix with his family rather than being confined to his room, have improved facilities to look after his personal care and access the wider community and meet up with his friends".*

Permission for the DFG scheme to go ahead was given by the private landlord in November 2021 and three contractors were allocated to provide quotes for the job. The most cost-effective quote was accepted and the grant was approved in January 2022.





The work was completed in March 2022 and the Ahmed's mother wrote in to thank the Housing Officer and the OT for all their support and understanding in dealing with the adaptations at their property. She stated;

"You have made a young man very happy".

She also thanked the contractor for going beyond their expectations in keeping them updated and addressing any concerns without hesitation.

The purpose of a Disabled Facilities Grant is to enable disabled people to have access in and around their home. A Disabled Facilities Grant can help, for example, to pay for a ramp, to widen doorways or replace a bath with a shower and is a process made up of a number of stages from an initial assessment, applying for a grant, getting estimates for the work and completion of any work. To find out more about DFGs please see our webpages www.coventry.gov.uk/help-live-home/disabled-facilities-grant



Aideen Staunton, (pictured) Head of Service, Partnerships and Social Care Operations said;

"It's great to see the difference this has made to Ahmed's life an accessible home is so important and has a direct impact on our health and wellbeing".



Currently awards through the grant scheme are mandatory but a new updated Housing Assistance Policy agreed in 2021/22 enables the Council to use a more discretionary approach to the awarding of grants. This more flexible approach will help more people who apply to us for funds. This will mean grants awards that do not exceed £6,000 would no longer need a financial assessment while there will be a new option to top-up grants that exceed £30,000.

3 Living and ageing well

David's journey towards more independence

David is 84-year-old man who has been profoundly deaf for most of his life following a fall from a great height as a small child. David uses British Sign Language (BSL) to communicate. To add to his challenges David cannot read or write and has started to lose his sight due to Glaucoma and cataracts.

David has always been independent but due to his failing sight he tripped whilst out due to an uneven pavement and since such time he has lost his confidence so stopped going out altogether. It was at this time that his daughter made the referral to Adult Social Care for an assessment.



"I hardly leave the house anymore as I'm embarrassed when I keep bumping into people".

David has no contact with the outside world and over the years his friends have passed away, so he has become more isolated, he also stopped attending the Deaf club and other social venues due to his failing sight.

"My only lifelines are Facetiming my daughter on the iPad and watching western films on my, without those i'd have nothing else to enjoy".

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David's main aim was to be part of the community and to have a social life without having to rely upon his daughter.

To enable David to fulfil his outcomes he received an assessment visit from the Visual and Hearing Impairment Team who provided him with a white cane to use when he is out, he also needed to learn a new form of communication before he lost all of his sight. The social worker and deafblind assessor identified a specialist service to teach David 'hands on signing' where David would gently place his hands on top of his communicator guides hands to feel the movements of the signs.

Learning 'hands on signing' will take a lot of practice, however David is embracing and enjoying learning a new skill, he has gained in confidence.

He has started to go out with the guide to the shops and is looking forward to joining the Coventry Resource Centre. David is also teaching his daughter some of the signs so when the time comes they will be able to communicate.

David still worries about his future and doesn't want to become completely isolated.

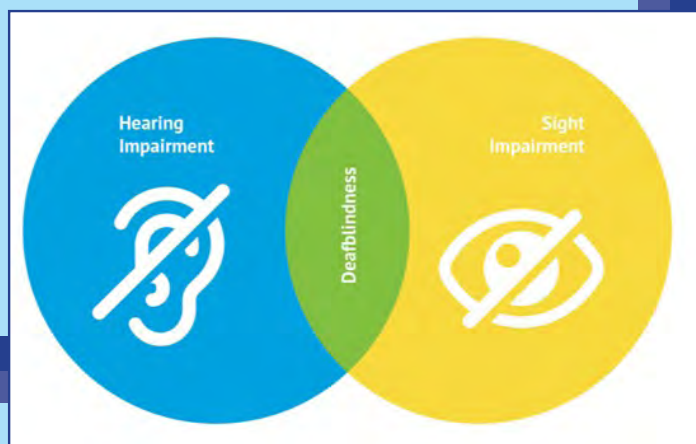
"I wonder what I will do, if it does become dark for me. Will I go into a home, just sit there in my chair and sleep more, just to be able to see in my dreams?"

Short Term Services to Maximise Independence (STSMI) are provided to promote people's independence with the purpose of enabling people to regain skills, confidence and to hopefully achieve what's important to people and promote their strengths. This service has not only improved David's quality of life now but will also help to prepare him and his family for the future when his needs change.

Janet, the social worker involved said;

"Working with David has given me the opportunity to use services creatively, seeing the transformation through his continued journey and how much he has gained in confidence with a positive outlook is very satisfying. On reflection I think "I'm just doing my job" but "just doing my job" has made such a difference to David's life and future".

In law, people are regarded as deafblind if their combined hearing and sight loss causes problems with communication, access to information, and mobility. People regarded as deafblind all have difficulties in these three areas caused by the interaction of the two impairments.



It is estimated that there are nearly

400,000

deafblind people in the UK. This is expected to increase to over

600,000

by 2023 due to our ageing population.



Deafblindness affects people of all ages, including children and young people, but it is more common in older people as our sight and hearing naturally worsen as we get older.

The Care Act 2014 says that a suitably qualified person who can understand the impact of both sensory losses must assess a person who is regarded as deafblind. We are pleased to say that following a successful training course we now have 2 more social workers trained as deafblind assessors in Adult Social Care.

4 Making the best use of resources

Supporting Adult Social Care staff through Digital innovation

Adult Social Care continuously looks for ways to support the workforce, through the use of digital and innovative tools and developments. One of the ways we are currently doing this is through the use of a digital dictation tool. 'Dragon Anywhere' is an application that supports staff to create documents of any length and edit, format and share them directly from a mobile device (usually a mobile phone), offering the following benefits;

- Saves time typing and eases pressure on administrative tasks
- Removes the need for social workers to travel to the office to make case notes saving time and reducing delay
- The software is intuitive and easy to navigate
- Dictation can be used as a memory aid

Stephanie Lamb, Community Case Worker and one of the members of staff taking part in the trial gives the following feedback on the tool;

"You can use it within 30 seconds. Just press the record button and, after you've finished, you can email it to yourself - it's that simple. It really is quick. I can now spend 10 mins dictating all the points I want to write, It saves time and is easy to use and it can help with long assessments and phone calls".

Adrian Flynn, Mental Health Social Worker also commented;

"I love the app and use it after all of my assessments. I find it very helpful, and it makes my work life a lot easier".

Hear more from Adrian directly about what this means in practice; <https://www.youtube.com/watch?v=p1nkPIEFluo>



Louise Ferro (pictured), Head of Business Systems and Continuous Improvement said;



"We are really keen to support our workforce in ways which can reduce time spent on recording and administrative tasks to enable more time to be spent having valuable conversations with people. Following evaluation later this year, if deemed a success the tool may become part of a suite of digital options available to staff to support them in their everyday tasks".

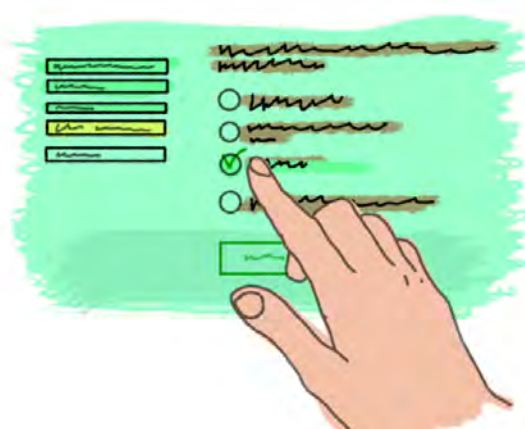


On-line Animated Self-Assessment Tool

Coventry City Council Adult Social Care has been part of a small group of Local Authorities who have worked together with an organisation called 'Looking Local' to develop an innovative on-line self-assessment form using short animations to support accessibility with what can seem a very complex process. Social workers, occupational therapists and technical experts were fundamental in ensuring the self-assessment tool included all the right questions in an easily accessible format covering all of the Care Act 2014 domains of care eligibility. The tool has been embedded into our initial contact process, and people making first contact with

Adult Social Care are asked to complete the self-assessment process prior to being contacted by our Social Work Initial Contact Team. The tool also offers signposting information and guidance to enable those people who are not eligible for or do not require social care interventions to find local support through other organisations.

This process will also support people and our social work teams by saving time during later assessment processes and help people navigate the Adult Social Care system when we are expecting an increase in requests for support.



Let's talk about you and your day-to-day life

This supported self assessment offers online advice, connecting you to resources and support to help you live your life independently.

[Begin your supported self-assessment](#)

5 Joined up care and support

Community Discharge Team rises to the challenge

Based at the University Hospital Coventry and Warwickshire NHS Trust (UHCW) our Community Discharge Team are hard at work supporting people to be discharged safely home, 7 days a week. The team has had to respond to significant change over the last 2 years.

In March 2020, revised measures were put in place nationally to manage the COVID-19 pandemic. This fundamentally changed the offer to people across health and social care nationally and impacted on the way patients were discharged from hospital.

Some of the requirements included:

- It was required that the discharge of patients would be extended to have discharge support available seven days a week

- Services needed to be available to support patients from 8am to 8pm daily
- Services to support effective discharge needed to be in place and this included brokerage, administration, equipment and therapy services in addition to social work

During this time the world's attention was brought to UHCW as it became the first hospital to issue the Covid vaccination with Margaret Keenan (pictured opposite) being the first person in the world to be vaccinated with the Pfizer Biotech jab!

Margaret returned to the hospital in 2022 to receive her spring booster.

www.england.nhs.uk/2022/04/maggie-keenan-among-millions-given-nhs-spring-covid-booster

Working at the hospital over the last 2 years brought about some key challenges, but at the heart of the team was ensuring that people who were in hospital were well supported on discharge.

Staff working during this time said;

"Not being able to see loved ones whilst they were in hospital, I think was incredibly difficult for any family and not having a regular point of contact. I hope I helped alleviate some of that anxiety by passing on any messages, even if it was just a quick hello or to say that their pet was being looked after".

"Ever-changing requirements for COVID-19 swabbing of residents in hospital for discharge back to care providers. This was challenging and very complex with high risk. The team had to be dynamic and adaptable"

"The pandemic also in some instances helped build resilience of staff working under stressful and dangerous circumstances".



"Throughout the pandemic the team was able to take on two social work students. Which was a fantastic way of gaining valuable work experience as front-line workers during a crisis".

The team continued to work at the hospital during the pandemic and held daily huddles to ensure that staff felt supported and were up to date with the Government changes.



They established the affectionately known 'FAB' team who worked with people who were isolating or had been exposed to the virus in commissioned services outside of the hospital setting.

In response to the requirements from the Government the Hospital Social Care Team and the Short-Term Therapy Team based at the Opal, came together as the 'New' Community Discharge Team, delivering services over seven days 8am to 8pm.

The 7-day offer has seen several improvements with people who are medically fit to leave the hospital being able to be discharged faster and supported to leave the hospital at the weekends.

In addition to the discharge capacity for patients the central safeguarding function for West Midlands Ambulanced Service (WMAS) referrals has been extended to cover seven days 8am to 8pm via the Hospital Based Community Discharge Team. This has proved particularly successful in both responses to safeguarding and admission prevention.

The Community Discharge Team works to positively promote the 'home first approach' by using the established discharge pathways together with the Community Discharge Therapy team implementing a service that helps people regain and develop their skills.

Integrated Care Record goes live

In a further example of how we are joining up care and support, during the year Coventry City Council took its first step in going live on the Integrated Care Record (ICR). This is an important development that will allow other health and care organisations to view our records and ultimately help us deliver better, safer care for people. It is widely recognised that the sharing of relevant data in a timely and secure manner supports the delivery of effective care.

As well as our own data, Coventry City Council professionals providing care for people will soon be able to see corresponding health care records. In the meantime, if you'd like to know more, please visit the ICR webpages.

www.happyhealthylives.uk/health-and-wellbeing/digital-services/integrated-care-record/

Coventry and Warwickshire Health and Care Partnership

Coventry City Council

Warwickshire County Council

NHS

Coventry and Warwickshire Integrated Care Record

6 Keeping people safe

Ian's story – a comfortable new home

Ian is a 65-year-old man with mental health problems who was admitted to hospital with an infection and confusion having collapsed at home. After 4 weeks in hospital, he was discharged to accommodation within a Housing with Care complex.

What was the situation?

Ian was on a very low income as he was under pension age and on Universal Credit. His income was £74 per week only. He had no family or friends who he was in contact with. He had a flat which was not in a habitable state to return to as it was in a state of disrepair and needed extensive cleaning. Ian also had rent and council tax arrears. Ian did not want to go back there as he associated it with becoming ill and being on his own.

Before going into hospital, a safeguarding concern had been raised due to concerns about his living conditions and that Ian was self-neglecting. It is likely that his poor health was a result of his environment, living conditions and not eating a balanced diet and Ian needed multi vitamins and other minerals to be prescribed for him whilst in hospital.

Whilst staying at the Housing with Care complex, staff reported that Ian needed prompting with personal care, with preparing healthier food choices and with keeping his accommodation tidy. Ian did not want to go back to his previous home. He was keen to live in a Housing with Care environment. He enjoyed talking to people and likes the company of others.

However, there were a number of barriers to moving;

- Low income, debts and not being on the right benefits
- No help from friends or family
- No furniture or belongings to take with him other than clothes
- No money in the bank to buy new furniture and carpets
- Difficulties managing money and budgeting



What did we do?

With the help of staff at the complex Ian was assisted to apply for the right benefits and applications were made for a Community Support grant to be able to access a new bed, kitchen items and bedroom furniture. The staff also gathered donations of furniture and white goods. Ian was referred to a money advisor for help with his debts and was eventually helped to move into a new flat in another Housing with Care scheme.

Stephanie Lamb Community Case Worker in the Older People's team said;

'When someone has a low income and no family support there can be a lot of obstacles to moving house. A joint approach from teams in the Council and Adult Social Care meant that Ian was able to move and not return to an environment which might have made him ill again'

How are things now?

Ian is now settled in his new flat and really happy with it. He has made friends and enjoys going to the restaurant for meals. Within days he had a TV donated to him from another resident. Ian was awarded backdated benefits which allowed him to clear his debts.

'Life is precious to me; I feel so lucky that people helped me to move here'.

'I have made friends and have a garden to look out on, I feel I have my life back now'. Ian added 'I reach my retirement age in September and can spend my retirement here as I have a lot of my life left to live'.

Since moving into the Housing with Care environment Ian's physical and mental health has improved. Ian was getting depressed at the thought of going back to his old tenancy as he did not want to live alone, had memories of the conditions he was living in and associated it with the trauma of being found on the floor collapsed. He is reassured by having staff on site who he can go to if he needs help. Having the right living environment can help people be as independent as possible and have a positive impact on their health and wellbeing.

Housing with Care, sometimes known as Extra Care, is housing designed for older people, with various levels of care and support available on site. People who live in Housing with Care have their own self-contained flats, their own front doors and a legal right to live in the property. In Coventry there is a range of Housing with Care schemes run by both the Council and private companies.

www.coventry.gov.uk/housingwithcare

If you are experiencing difficulties due to the rising cost of living the City Council has a web page dedicated to information and advice concerning how to reduce outgoings and get help and support.

www.coventry.gov.uk/costofliving

7 Carers at the heart of everything we do

Carers Trust Heart of England get creative

Within Coventry we work in close partnership with the Carers Trust Heart of England to ensure that we can support as many people across the city who have caring responsibilities. Supporting carers is such an integral part of the way we work in Adult Social Care. Here the Carers Trust Heart of England tell us a bit about their work throughout 2021/22 with a focus on coming out of pandemic restrictions and what carers told them was important.

The impact of the pandemic lasted longer than any of us imagined with the ever-changing social restrictions. This led to all of us constantly changing the way we work and socialize and undertake our daily routines. The impact on those with additional caring roles was immense. Here at Carers Trust, we continued to adjust what we did to ensure we continued to support Carers on their caring journey in a way that responded to those changing needs.

Like many organisations the hybrid way of working was born. Delivering services both digitally and face to face, will be a lasting legacy from the pandemic which has changed service delivery for everyone.

The service continued to utilise the enhanced funding from Adult Social Care:

- To support carers who were isolated and lonely
- Supporting carers experiencing grief and loss
- Ensuring hard to reach communities were involved
- Supporting carers who don't have access to technologies
- Supporting carers experiencing financial hardship
- Worked with employers to support carers who are juggling work and caring
- Providing direct payments for carers to help achieve outcomes



Supporting Carers to take a break

This year we developed our offer on respite opportunities for carers. The last year had an unprecedented impact on carers connecting socially and interacting with other carers and accessing vital respite and peer to peer support. We secured additional funding to complement and enhance our contract within Coventry. This funding gave us the additional resources to offer a variety of respite opportunities to carers both face to face and digitally.

Connecting carers – The Carers Creative

We ran a programme of activities and events, the most popular were creative activities, such as flower arranging, gardening, pinch pottery, also relaxation sessions such as Yoga, Zumba, Mindfulness and Aromatherapy and events around festivals such as Diwali and St Patricks Day. For many carers it was a tentative step back into the community and doing something for themselves after many months of staying at home worrying about the impact of the pandemic keeping themselves safe and those they care

for. Doing something fun and engaging also helps us connect with carers in a way that helps explore other support such as offering a carers assessment or identifying the need for a direct payment:



"Coming to the flower arranging session enables me to do something I enjoy and take something home to show my loved one what I have done. Learn a new skill and make new friends".



"When I am being creative I am putting myself first not last, I know now this is ok to do. Thank you, carers Trust, for giving me the space for an hour".

"The last two years I have been so lonely, coming to the flower arranging I am doing something wonderful and now have some good friends who understand me".

Reaching out in new ways

In the last year we started to make use of podcasts. We released a number of podcasts during Carers Week and are continuing to produce content for them, this includes an episode on Lasting Power of Attorney with Emma Austin from the Central England law centre. You can listen to all episodes here:

<https://anchor.fm/carerstrusthoef>

We are so excited to start recording these Podcasts. It's so accessible to everyone and we can really focus on information and services that we know really impact the Carers we support as well as highlighting real Carer stories.

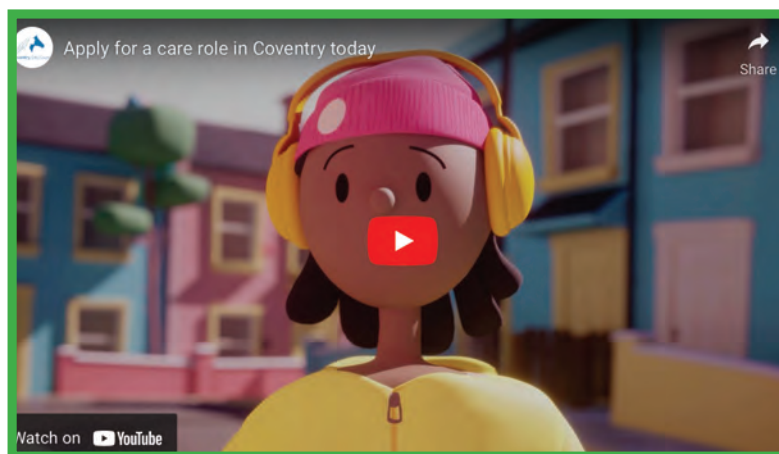


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8 Committed Workforce

Working in Adult Social Care, making a difference

Recruitment and retention within the Adult Social Care sector has been an ongoing issue for a number of years and has been further exacerbated by the COVID-19 pandemic. To support our providers in drawing in new recruits and retaining their existing staff through these challenging times, the Adults Commissioning Team worked to produce a 2-minute **animated video** for use free of charge by providers, aiming to highlight the benefits of a career in care and the wide variety of jobs available.



The video directs potential applicants to job roles advertised via the www.findajob.dwp.gov.uk website and acts a valuable resource to support recruitment.

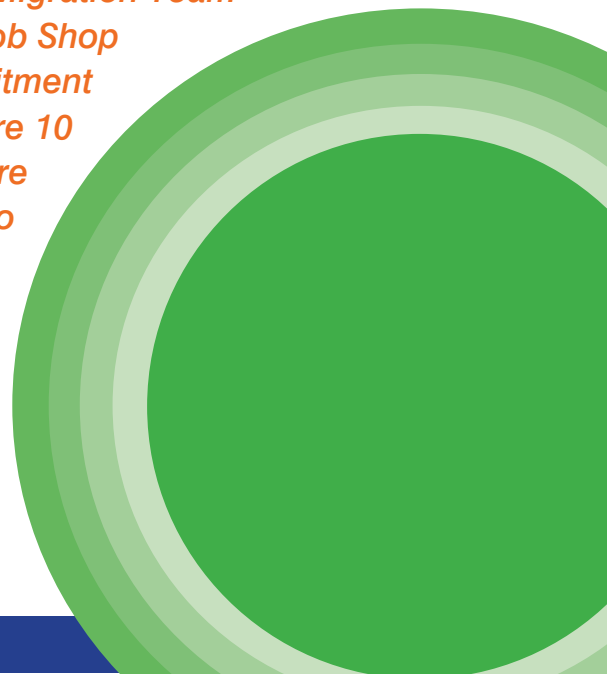
Promotional work was undertaken with a wide variety of partners in the city including The Job Shop, Coventry University, voluntary sector organisations and Health, to drive recruitment and increase retention within the city's social care workforce.

The video has so far been viewed over 600 times on YouTube, displayed in the window of The Job Shop and has been used by a number of providers in their own recruitment and advertising campaigns. The video remains available for any provider needing to supplement their own recruitment practices.

Neil Byrne, Service Manager Adult Commissioning said;

"The pandemic, although a particularly challenging time for recruitment and retention in the adult social care workforce, brought attention and recognition to the sector on an unprecedented scale; more people than ever before became aware of the value and importance of those working in the care sector."

"To build on the increased public appreciation, a more innovative method of recruitment was needed. The video offered a more personable and relatable means of advertising which could be used to target a wider audience than traditional recruitment campaigns. The video worked to show our commitment in supporting the provider market and we encourage feedback from all Coventry providers on how we can best support with recruitment on an ongoing basis. Most recently, we have worked with the Council's Migration Team and The Job Shop on a recruitment event where 10 people were recruited to roles in care".

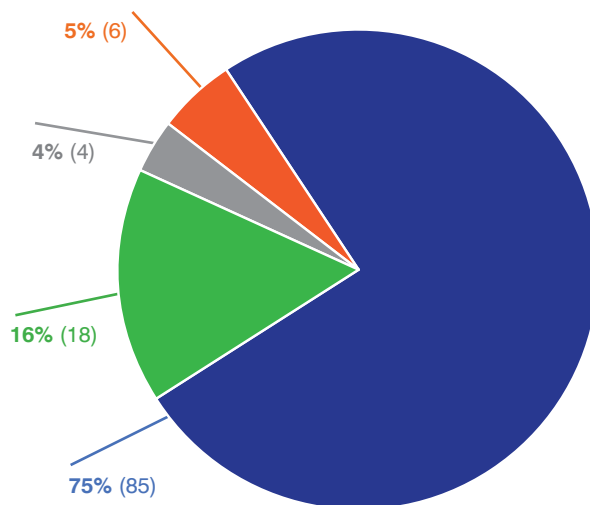


Working with Providers

During last 12 months Coventry's (Care Homes and Community based Adult Social Care services) Care Quality Commission (CQC) ratings have not changed significantly. There has been an increase in "Inadequate" rated provision but a larger reduction in 'Requires Improvement' rated services since last year, similar numbers remain the same for 'Good' rated providers. The Joint Health and Social Care Quality Assurance Team worked with operational colleagues to ensure the safety of services users including where

March 2022 - CQC Rating for the Coventry Care Market

■ Good
■ Inadequate
■ Outstanding
■ Requires improvement



provision was rated as 'Inadequate' or 'Requires Improvement' (Please note since March 2022 a number of the inadequate providers no longer operate in Coventry).

In comparison to national figures, Coventry Adult Social Care CQC ratings fair well, Coventry has higher rated good providers compared

to the national average (6% more) however the requires improvement providers are slightly above the national average (by 2%) with the same number for inadequate rated provides nationally. Work is ongoing with providers in 2022/23 to improve this position.

Care Home Improvement

The COVID-19 pandemic impacted on our ability to conduct visits to care providers and although visits continued to take place where essential, In the last 12 months the Joint Quality Assurance Team started work with all care homes to ensure a full quality assurance visit and a continued focus of assurance activity on commissioned community providers with poor ratings.

In addition to the above programme in the last 12 months we developed a refreshed quality assurance approach and reviewed the effectiveness of our Provider Escalation Panel (PEP). PEP is a multi-agency panel led by the City Council, made up of agencies across health and social care working together to address any provider quality or market concerns.

During 2021/22 the quality improvement campaigns restarted with a focus on Infection Prevention and Control, reinstatement of the care home provider forums and the creation of improved service engagement and involvement activities within care provision.



Care Providers providing the love

Care providers across the city needed to respond to the COVID-19 pandemic and as the pandemic subsided kept a focus on keeping their clients and staff safe whilst continuing to provide support for people and help them maintain contact with friends and family. This included paying attention to special occasions.

Tenants at Cophthorne Lodge Housing with Care scheme enjoyed a special Valentine's lunch. Staff worked hard to ensure that those who are widowed or single were not left out or feeling lonely. Whilst Valentine's Day can be a great day for some, it can be a difficult day for those whose loved ones have passed or those who are living on their own

Although there were no wedding proposals! Everyone felt loved and had an opportunity to remember their loved ones.

Tenants commented on the day;

"Very, very nice and thank all the staff it was lovely and very beautiful. The card, arrows and how the tables were set were so beautiful".

"I enjoyed it very much and to thank all the staff, I felt I was in love, and it was very beautiful and brilliant".



Jon Reading
Head of
Commissioning
and Quality said;

"The Valentine's celebration beautifully illustrates how it is possible to deliver care and support in a way that is person centred and treats people in a way that we would all like to be treated. It is just one example of where providers go above and beyond each and every day to support people to live a full life. In our quality assurance work we strive to build on good practice like this as well as tackling issues where standards fall below what we would all expect".

Innovation and Change

The Social Interventions Collective (SiCol) – one year on

A new and transformative service has been operating in Coventry for the past 12 months, led by the City Council's Approved Mental Health Practitioner (AMHP)/Social Work Service and two of the Council's internal provider services; The POD, which specialises in social advocacy and brokerage and Axholme Services providing intensive personalised one to one support. It has proven its worth, in its first year, by identifying and supporting at least 75 people at risk of psychiatric admission or serious mental health deterioration.

SiCol is a way of working that recognises the importance of weighting social and medical factors in crisis case 'formulation' (understanding key factors of a problem situation), rather than relying on the traditional dominance of the medical model. It was created and piloted in response to the tragic and untimely deaths of 2 males by suicide where social factors were identified as contributors. Those stressors included eviction, debt, loss of independence, loss of vital personal relationships and loss of access to key health and social care services caused by declining physical health.

The service was awarded funds from NHS England after a successful pilot and operates within the revised crisis support offer within the City. SiCol provides intensive and timely support on complex social issues. This means it covers a wide spectrum of social needs such as housing, debt and employment, bereavement, access to children subject to statutory procedures. SiCol mobilises advocacy, provides specialised support and links to key statutory services, local community groups, faith and user-led organisations.

Peb Johal, Senior Social Care Practitioner said;

"Although delivering and designing a service from grassroots has been challenging and has some way to go, it has been an extremely rewarding experience working with our NHS colleagues".

"It was a common statement, heard almost daily, from our NHS colleagues 'it's not a mental health problem it's a social one' without realising just how interrelated someone's mental health and social needs are".

SiCol has helped people in different ways, from providing intensive and one off support, with the crucial aim of resolving fundamental social issues.

Andy Seys, AMHP Lead and Team Manager SiCol, said;

"SiCol has been deliberately developed organically, via a bottom-up process with messages from individuals using services. The evaluation shows clearly the complexity of the work and also the commitment, hard work, skill and tenacity of those working within SiCol".





Sally Caren, (pictured left) Head of Adult Social Care and Support at Coventry City Council, said;

"In a short space of time this work is already leading the way and informing social work across Coventry and

Warwickshire. The commitment by colleagues to make this project a reality has been inspiring. The social model applied doesn't use a one fits all approach, but it does

recognise peoples' own expertise and lived experiences. It puts the person first and helps people in handing back power so they can shape the solutions. It aligns itself well with the principles of the Care Act 2014 in terms of wellbeing and strength-based approaches".

Over the past 12 months **95%** of psychiatric admissions were prevented, and at least **125** social issues were addressed with the support of a large network of around **50 partners** playing their part. The approach now forms a recognised element of the NHS Mental Health Transformation programme locally.

The Coventry Social Interventions Collective (SICoL) Social Model of Practice



Co-production and Engagement

In Adult Social Care we place adults and their carers at the heart of everything we do. We are committed to ensuring that people with care and support needs and their carers can be equal partners in planning and shaping future developments in Adult Social Care. But we know we've got some way to go with this.

Behind the scenes we've been working hard to try and develop our own approach to co-production and ensuring that we are involving people with care and support needs and carers in the development of services, something as simple as ensuring we get feedback along people's journeys, to being part of recruitment decisions to helping shape and create new services. That is why we've developed the 'Engagement, Involvement and Co-Production Our Approach – 2022' a document which outlines our key commitments to making this happen. We want to ensure that the involvement of people with care and support needs and carers becomes standard practice.



Peter recruits his own support staff

What did we do?

For the last 4 years we have tried to improve the involvement of Promoting Independent Living Service (PILS) tenants in the recruitment of their own staff.

The Promoting Independent Service offers support to people in their own tenancies around the clock to live as independently as possible, to be active in their local community and to live the lifestyle that they choose to live.

Some people live in their own house others live in shared accommodation with friends. Peter lives in his own flat, within a small number of flats, with staff on hand 24/7.

What could be more powerful than people choosing those that are going to be supporting them in the future?

We provide training with tenants to ensure they understand the recruitment process and how to identify the right attributes in their future staff. We use a card system made up of staff pictures with a description of them on the back. This is designed to ensure people are not choosing a friendly looking face or rejecting people on grounds of gender, race, or age.

During COVID-19 we have had to suspend tenant involvement due to recruitment happening on-line, but now we are back in the room, so to speak, we are really looking at innovative ways of getting the most involvement we can in partnership with our tenants.

Peter's role on the interview panel

Peter is a 43-year-old man, with mild learning disabilities, who receives support involving everyday tasks, shopping, cooking cleaning etc. Peter has his own tenancy and works very hard on keeping his flat clean and tidy. Peter is not the most confident of people as he has a slight speech impediment which can make it difficult to understand him when talking so being part of the interview panel and asking his own questions was a big challenge for him.

Peter chose his own questions with help from the staff who support him at home, independent of the recruiting panel.

Peter was able to ask his own questions to each candidate and other panel members were able to clarify any parts of the question candidates did not understand as Peter is not always easy to understand if you don't know him well.



Peter contacted the successful candidate to offer them the job! Peter reflected on the process;

"Scary!". "Really enjoyed it". "Will I be able to do it again?".



Malc Shiner, Support Coordinator said;

"We started doing this to continue the empowerment of our tenants in the process of employing staff. Who better to have an input into this than the very people being supported? We have done this a few times now and it has always been a positive experience for all tenants. It has

built their confidence, increased their self-esteem and a chance to do something that they would find difficult to experience in any other service. Interviewees also get the opportunity to meet and interact with those that they will work with right at the start of their career, giving them a small taster of what the future could be like as part of the PILS family".

What next and looking forward

PILS are hoping to use photos and video footage in our adverts in order to show candidates our commitment to involving tenants in the recruitment process and showing what they can expect if they come to interview.

In the future PILS want to look at how we involve our tenants who don't use speech as their way of communication in the interview process. Potentially as part of the interview, all candidates will be asked to do a project or test with the tenants designed to see how they interact with people.

Tracey Denny, Head of Service Localities and Social Care Operations said;

"It's great to see what the service is doing to involve people in recruitment and something we want to ensure we build on and see happening across the rest of our teams".

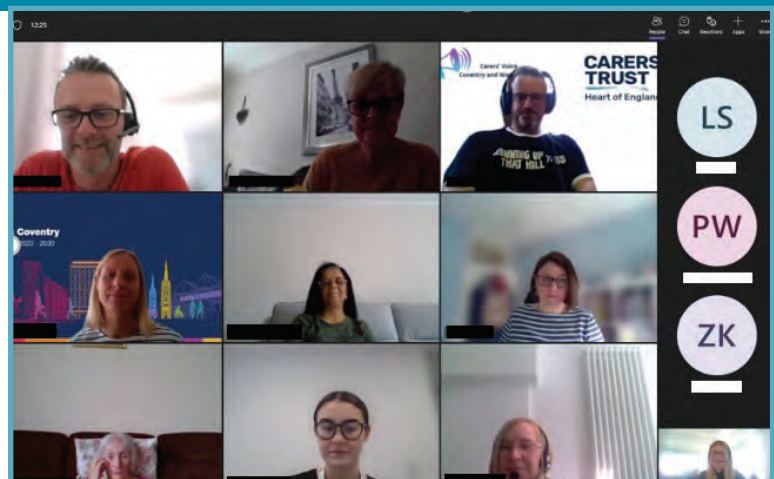


Adult Social Care Stakeholder Group

The work of Adult Social Care continues to be supported by our Stakeholder Group, who meet regularly to discuss any updates and influence the improvements of the service. The group is made up of Coventry residents who are experienced in how services work.

June, (pictured below) one of the new members said;

"One of my personal reasons for joining the Adult Social Care Stakeholder Group was to be involved in the development and improvement of services. I have a combination of experience in both my



previous working life and in my personal life and now that I am retired I am keen to share and use this experience to help improve outcomes for people living in Coventry. I am passionate about good Mental Health Services and supporting people, their family, friends and carers who support them with the right information and advice at the right time. The Adult Social Care Offer is an example of how the group has been involved in the production of information and our views and suggestions have been incorporated to ensure the statement is clear and accessible for all".

To find out more about Getting Involved visit www.coventry.gov.uk/health-social-care-say-getting-involved/getting-involved-adult-social-care



Performance Matters

On a yearly basis Adult Social Care undertake a survey of the experience of adults in receipt of support and every other year we undertake a survey of the experience of carers. These infographics shows our performance. This information helps us set our future priorities and identify any areas for improvement.

Understanding the views and experiences of Adult Social Care CARERS 2021/22

About the survey

A random selection of people with caring responsibilities who received an assessment or review within the 12 months prior to 31 August 2021



Survey respondents age between 20 and 100, average was

72

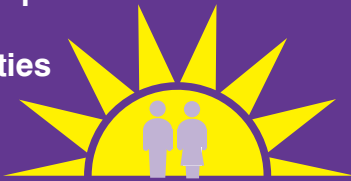


34%
male
66%
female



Of the people who were being cared for **27%** had physical support, **15%** memory and cognition, **42%** unknown and the rest included learning difficulties, mental health and other needs

Enhancing the quality of life for people with caring responsibilities



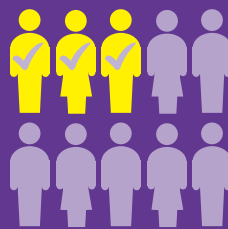
Carers reported quality of life

7 out of **24**

25% 

said they had as much social contact as they would like

Ensuring that people with caring responsibilities have a positive experience of care services and support

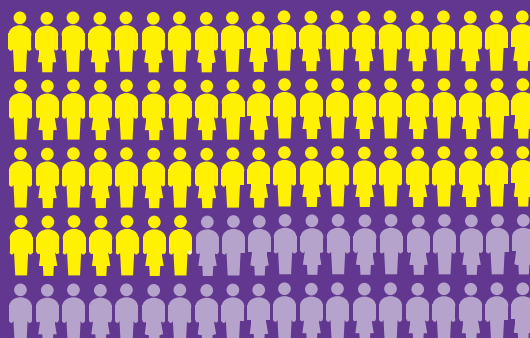


3 out of **10** carers said they were satisfied with the social care support they received

60% 

said it was fairly easy to find information about services

Ensuring people with caring responsibilities are included and consulted in discussions about the person they care for



67%

of people with caring responsibilities felt included or consulted in discussions about the person they care for



Understanding the views and experiences of Adult Social Care PEOPLE WITH CARE AND SUPPORT NEEDS 2021/22

About the survey

A random selection of service users were contacted who received long term support as at 1 December 2021



385

Service users gave us their feedback



Ages of respondents varied between 18 and 102
Average age was

60



43%
male

57%
female



Of the people who were being cared for **58%** had physical support
20% learning difficulties, the rest had other needs

Enhancing the quality of life for people with caring responsibilities



People scored their quality of life

19 out of **24**



42%

said they had as much social contact as they would like



7 in **10** people said they have enough control over their daily life

Ensuring that people have a positive experience of care services and support



6 in **10** people said they were satisfied with the social care and support they received

66%



said it was fairly easy to find information and advice about support, services or benefits

Ensuring that people who are vulnerable feel safe and protected from harm



72%



said they feel safe (this includes feeling safe from abuse, falling or other physical harm both inside and outside the home)



85% said services received helped them feel safe

S75 Partnership Agreement

We have a Section 75 Partnership Agreement with Coventry and Warwickshire Partnership Trust (CWPT) for the delivery of integrated mental health services. This agreement dating back to 2014 has now been extended for a further three years from April 2022. Each year the Partnership Trust produces its own Annual Report of the performance of the partnership arrangements to provide integrated mental health services in Coventry and Warwickshire. This report when published will be available via the Trusts website www.covwarkpt.nhs.uk/



Complaints/ Compliments

Everyone has the right to receive a good level of service and we want people to get the best possible support from us. Listening to your views helps us to put things right and improve our services for the future, so comments, compliments, complaints and suggestions are important and always welcome.

[www.coventry.gov.uk/
ascommentscomplimentscomplaints](http://www.coventry.gov.uk/ascommentscomplimentscomplaints)

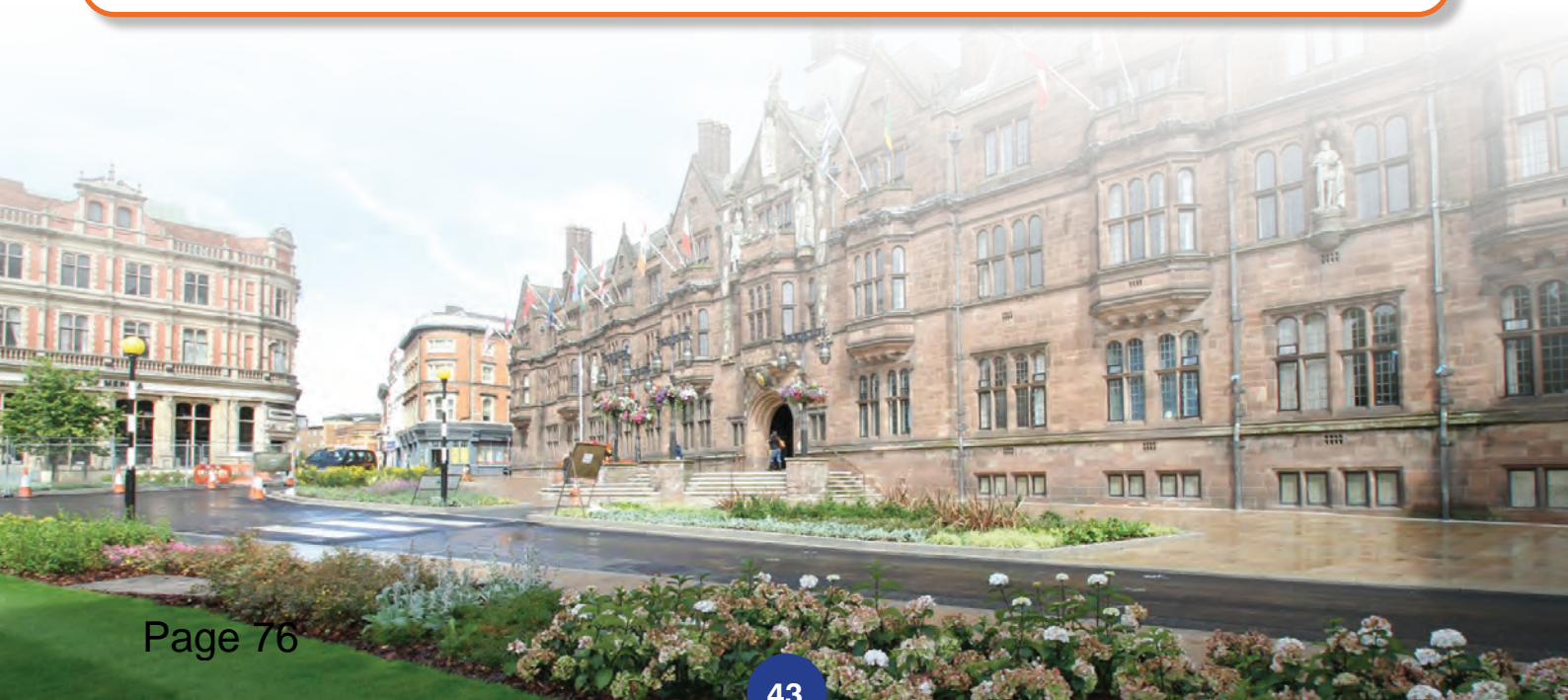
In 2021/22 we received



72
complaints



but nearly 4
times more
compliments
279



Celebrating Our Own Strengths

Awards and Good News



Adult Social Care celebrates our City of Culture

In 2021-2022 all eyes were on Coventry as we became the second City of Culture in the UK. The start of festivities were slightly delayed until June 2021 to take into account the national lockdown and to ensure that people would get the most out of the programme of activities and that Coventry still got it's chance to shine. It was important that all residents in Coventry felt part of the year. The company Creative Mojo with funding from the Coventry City of Culture Trust were able to work with Care Home residents to create some wonderful artwork across the city as part of the Winter Wonderland display. The displays played

on the strengths and interests of residents from Care Homes, including celebrating the automobile industry within Coventry.

The materials used meant that it was easy to get residents included in the design and creation of a number of different art installations. The end results are incredible.



Bringing it all together event

In March 2022 representatives from across Adult Social Care came together to discuss and celebrate the strengths of the service, with workshops focusing on the future developments taking place in Adult Social Care and to introduce the development of Team Planning approaches. These Annual

Team Plans are key documents which show how individual teams contribute to the Council's overall priorities and how by working together we can deliver our Adult Social Care service effectively whilst continuing to improve.



Foodie Awards 2022 Finalist announcement - Community and Food Hero Award - The Pod Café



This award recognises those who have gone the extra mile for the food scene in Coventry and Warwickshire. Whether that's helping the local community, providing opportunities, creating a brand-new business that benefits the area, or anything else that supports the food and drink world in the region. The Pod Café is a finalist this year, with a public vote to

Adults Services Wellbeing

A staff wellbeing week was held in March 2022 this being a daily mixture of online and in person activities and events focusing on health and wellbeing for our Adult Services. The week was organised as an opportunity to reflect on our own wellbeing and perhaps learn some new ways of looking after ourselves and our health. There were a variety of sessions on offer which included virtual sessions focusing on learning new skills, boosting well-being and virtual yoga sessions and appointment-based sessions for nutrition, musculoskeletal issues and blood pressure/cholesterol levels.

The week was well received by our staff with over 200 people attending various sessions over the week.

take place. The winner will be announced at the Foodie Awards night at Fargo Village.

www.visitcoventry.co.uk/news/article/39/vote-for-the-winner-of-the-food-hero-community-award-2022

Improving our Internal Provision

Eric Williams House are moving forward and working towards the Butterfly Model of Care. This looks at creating a home from home and means that they personalise all resident's care and address holistic needs of the individual.

Part of this was looking at the bedroom doors, they were all drab and a battleship grey in colour, this meant that the residents could not identify their own bedrooms as they all looked the same. Eric Williams staff embarked on project which meant that all the bedroom doors would be replaced to look like front

doors, they were to have to room numbers on with door knockers or letter boxes to resemble a front door, this is to make them easier to be identified as bedroom doors as the lounges also comprise of bathrooms, toilets, and linen cupboards.

The bulk of the work took a little over 4 weeks, the old doors and frames were removed and swiftly replaced with the new frames and doors. Although they are not fully finished and there are still somethings left to do it has already had a positive impact on residents.

One of the residents Celia has fallen in love with her front door and is absolutely over the moon with it. She said;

"I absolutely love it! It makes such a difference".

We are continuing to improve the physical environment for people supported in our internal services but also for the staff who work there. The last years have been a challenge for staff, with ever changing guidelines to work to, increased infection control and cleaning protocols, managing outbreaks and maintaining a safe service. A lot of the time staff did not get a chance

to take a break and took on different roles and extra duties so there was not a lot of time spent reflecting on what was happening to enable staff to deal with the effects this may have been having on their health

and wellbeing. So, at Eric Williams House a project was led by Christine Calcott

Assistant Manager to update the staff room which had not been changed for many years.

Staff were engaged as to what they wanted, and workforce grants accessed to make the improvements. The staff are really pleased with the end results.



"It's nice and more relaxing"

"Creates a relaxing atmosphere"



Terri Hallinan, Unit Manager said;

"Eric Williams House is a family, the journey that we have taken together through the last few years due to the pandemic has strengthened our foundation. All staffing roles are physically and mentally demanding, being kind to yourself is not always easy when looking after others. If there is one thing we have learnt, is we need to also think about our own mental wellbeing. This was the seed that was planted for this project, as you can see it grew into an area that now has a positive impact daily on team members working life at Eric Williams House".



Achieves in the Community Award

Sarah Laughton, Development Worker at the POD and Christine Eade, Manager of The POD, won the Ladies First Professional Development Awards 2022 in the category **Achieves in the Community**.

The event was celebrated at Coombe Abbey. A person who accessed their support through The POD, nominated them for their outstanding work.



Principal Social Worker Annual Report

Most areas now have a Principal Social Worker for Adults and Children's, supported by national and regional networks. The Care Act 2014 says local authorities should make arrangements to have a 'qualified and registered social work professional practice lead' in place.

In support of ensuring visibility for the role and celebrating achievements, our Adults Principal Social Worker, Andrew Errington, has produced a fourth annual report.

www.coventry.gov.uk/pswannualreport

What's Next?

Key Areas of Development for Adult Social Care 2022/23

In previous years our improvement priorities have been shaped around four key areas:

- **Our Promoting Independence model**
- **Accommodation offering care and support**
- **Locally based support**
- **Digital Technology and innovation**

However, the environment in which Social Care operates is changing. As we reflected on earlier in the Report this includes Government proposals for Adult Social Care reforms, the introduction of Integrated Care Systems and the One Coventry Plan currently being consulted on.

Whilst the changes will impact on Adult Social Care as we move forward, what has not changed is the people who come to us for support and the core purpose of Adult Social Care in supporting people to achieve their outcomes and to live as independently as possible. Therefore, when considering our future priorities, we must be conscious of the impact of the changing environment while remaining committed to our core purpose.

Recognising the changing environment, we are focussing our improvement work on three areas: **reforms, partnerships and internal improvement**. The key elements of each of these areas are summarised opposite:



1

Adult Social Care Reform

This will include;

- Act in accordance with Government requirements to move towards a **Fair Cost of Care** and to develop and utilise a Market Sustainability Plan by February 2023
- The implementation of a cap on social care costs, the **Care Cap** requirements to be in place by October 2023
- The implementation of new **Charging** thresholds and a revised Charging Policy by October 2023
- Continuing to prepare for the implementation of **Liberty Protection Safeguards** (replacing the Deprivation of Liberty Safeguards) at a date to be confirmed by the Government

2

Adult Social Care Improvement

This will include;

- **Workforce** - We will look to develop and support our internal and external workforce with a focus on recruitment, retention, culture and learning and development
- **Supporting our residents** – We will review our service levels and customer standards in order to provide clarity on what people can expect from Adult Social Care when contacting us and receiving support
- **Diversity and Inclusion** – We will undertake community engagement events to raise awareness of Adult Social Care, including specifically within hard-to-reach communities. We will listen and respond to feedback regarding our service and how we can improve
- **Information and Engagement** – We will ensure the Adult Social Care Offer is accessible to all, redesigning the way we share information on our webpages and expanding the ways we engage on and co-produce our services.

3

Adult Social Care Partnerships

This will include;

- **Change and Transformation** – We will continue to build relationships with partner agencies. Working jointly with Coventry and Warwickshire Partnership NHS Trust (CWPT) within the Section 75 Agreement we will find new solutions and ways of working to support people experiencing mental health problems
- **Improving Lives for Older People** – We will work in partnership with health and voluntary sector organisations to implement the improvements identified by this programme to ensure older people can live independent lives in good health in Coventry
- **Integrated Care Record** – We will use new joined up records to deliver, better, safer and more timely care and support to people
- **Voluntary Sector and Communities** – We will work in partnership with the voluntary sector and community groups to improve the support available locally to adults

Glossary

This section provides an explanation of some definitions and terms that appear throughout this document.

One Coventry

One Coventry is how we describe the Council's objectives, key strategies and approaches. It includes the Council's vision and priorities; new ways of working; and core areas of activity.

Integrated Care Systems (ICSs)

Integrated care systems (ICSs) are partnerships of organisations that come together to plan and deliver joined up health and care services, and to improve the lives of people who live and work in their area. 42 ICSs were established across England on a statutory basis on 1 July 2022.

Home First

Providing short-term care and reablement in people's homes or using 'step-down' beds to bridge the gap between hospital and home meaning people no longer need to wait unnecessarily for assessments in hospital.

Brokerage

A brokerage service finds information about service providers and other resources. For example, agencies that provide help with personal care and activities of daily living.

Power of Attorney

A power of attorney is a legal document that lets you give one or more persons the power to make decisions and manage, your money and property, and/or your health and welfare.

Housing with Care

Housing with Care, sometimes known as Extra Care, is housing designed for older people, with various levels of care and support available on site.

Promoting Independence.

Short-term services which aim to maximise the independence of the individual. At the end of the support, ongoing care and support services will be arranged as required.

Short-term Support

Short term support that is intended to be time limited, with the aim of maximising the independence of the individual and reducing the need for ongoing support by the Council.

Safeguarding

Safeguarding is how we work with people to prevent them experiencing harm from others or sometimes themselves. It includes helping people recover when they have been abused.

Carer Assessment

If you care for someone, you can have an assessment to see what might help make your life easier. This is called a carer's assessment.

Disabled Facilities Grant (DFG)

A Disabled Facilities Grant or DFG is available from Local Authorities to pay for essential housing adaptations to help disabled people stay in their own homes.

Infection Prevention and Control (IPC)

Infection prevention and control is a practical, evidence-based approach which prevents people and care workers from being harmed by avoidable infection and as a result of bacteria and viruses not responding to medicines.

Section 75 Partnership Agreement

These partnership agreements, legally provided by the NHS Act 2006, allow budgets to be pooled between local health and social care organisations and authorities. Resources and management structures can be integrated, and functions can be reallocated between partners.

Co-production

When an individual influences the support and services received, or when groups of people get together to influence the way that services are designed, commissioned and delivered.

Useful Contacts

Adult Social Care and Communities Directory

This online directory has all the information and advice you need in one central place, so you can find the information you need easily.

Website: <https://cid.coventry.gov.uk/>

Council Contacts & Mental Health Services

Adult Social Care Direct	The first point of contact for any referrals into Adult Social Care	024 7683 3003
Emergency Out of Hours (After 5pm Monday to Thursday, 4.30pm on Friday and throughout the weekend)	For urgent enquiries / emergencies only outside of normal office hours	024 7683 2222
Main Council Customer Services	The main switchboard for Coventry City Council	080 8583 4333
Mental Health Access Hub	Run by Coventry and Warwickshire Partnership NHS Trust (CWPT), this is the first point of contact for people accessing CWPT mental health services	080 8196 6798

Other Organisations

Age UK Coventry	Supporting adults 18+ providing information and advice, support and groups	024 7623 1999
Alzheimer's Society Coventry	Supporting adults with a diagnosis of dementia and their families with the provision of information and advice and group-based support	024 7665 2602
Carers Trust Heart of England	One-stop shop for unpaid carers of all ages	024 7663 2972
Coventry & Warwickshire MIND	Support for people living with a mental health condition	024 7655 2847
Macmillan Cancer Support	Cancer Support Service	024 7696 6052
Healthwatch	Independent organisation supporting people to have their say in health and social care services	0300 0120315
SEND Information, Advice and Support Service	Providing information and advice to young people with disabilities and special educational needs	024 7669 4307

Special Thanks to....

Saba, Ahmed,
David, Ian and Peter
Carers Trust Heart of England

All care providers across the city
The staff at Adult Social Care

All our partners and stakeholders

Contact Us

You can contact us about this report at:
getinvolved@coventry.gov.uk

You can contact Adult Social Care Direct at:
Email: ascdirect@coventry.gov.uk

Telephone: **024 7683 3003**

Next Generation Text (also known
as Text Relay and TypeTalk) Call **18001 024 7683 300**

More information about Adult Social Care can be found at:
www.coventry.gov.uk/adultsocialcare

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To: Cabinet

Date: 11th October 2022

Subject: Adult Social Care Annual Report 2021/22 (Local Account)

1 Purpose of the Note

- 1.1 To inform Cabinet of the outcome of the discussions about the report Health and Social Care Scrutiny Board 5 considered on Adult Social Care Annual Report 2021/22 (Local Account) at their meeting on 14th September 2022.

2 Recommendations

- 2.1 Health and Social Care Scrutiny Board 5 considered the report and submit the following comments to Cabinet for their consideration:
- 1) The Board welcomed the production of the report, and noted its value, acknowledging it was not a statutory requirement to produce the Adult Social Care Annual Report
 - 2) Supported the work being undertaken to promote Adult Social Care services to the City's diverse population to ensure services were available where needed
 - 3) That the impact of the growth in demand be monitored as the demand in growth did not correlate with an increase in workforce. The Board raised concerns that this may impact on the quality of care received and needed to be monitored.
 - 4) That opportunities to diversify the workforce to reflect the population including at care assistant level be explored
 - 5) Assurances were sought that the reasons for the increase in safeguarding enquiries and concerns were being monitored and understood
 - 6) The Board sought assurance regarding the reported performance measures including trends in compliments and complaints

3 Background and Information

- 3.1 At their meeting on 14th September 2022, Health and Social Care Scrutiny Board considered a report on Adult Social Care Annual Report 2021/22 (Local Account).
- 3.2 Following a robust discussion members were supportive of the content of the Adult Social Care Annual Report 2021/22 and made the comments above for Cabinet's consideration.

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Cabinet
Council

11 October 2022
18 October 2022

Name of Cabinet Member:

Cabinet Member for Children and Young People - Councillor P Seaman

Director approving submission of the report:

Director of Children's Services

Ward(s) affected:

All wards.

Title:

Coventry's Youth Justice Strategy and Plan – 2021-23 (Update 2022) (Youth Justice Plan)

Is this a key decision?

No - although the proposals affect more than two electoral wards, the impact is not expected to be significant.

Executive summary:

This paper is being submitted as notification that the Coventry Youth Justice Service (CYJS) - Youth Justice Plan has been agreed and signed off by its Chair, the Director of Children's Services, and to seek Council endorsement.

Youth Offending Teams (known now as Youth Justice Services) were established under the Crime and Disorder Act 1998. The functions assigned to the Youth Justice Service include the duty upon the local authority, under the Children Act 1989, to take all reasonable steps to encourage children not to commit offences. The Crime and Disorder Act imposed a duty on each Local Authority, acting in cooperation with its Statutory Partners (Police, Health, and Probation), to ensure that all Youth Justice services are available in their area to such an extent as it appropriate for the area.

The key tasks of the service are:

- Management and delivery of community sentences
- Assessing and delivery of out of court disposal interventions
- Assessing and delivery of diversion support to children at risk of entering the Youth Justice System.
- Management and delivery of secure estate sentences and resettlement

- Servicing the Youth Court and Crown Courts (in terms of provision of the court team, Bail & Health Assessments, provision of Pre-Sentence Reports and Stand-down Reports)
- Parenting services and management of Parenting Orders
- Victim services

The Crime and Disorder Act also imposed a duty to complete and submit a Youth Justice Plan each year. The Plan provides an update against the 2021-23 strategy. For the first time this year, the Youth Justice Board (YJB) mandated a template for the plan as part of their grant agreements with Youth Justice Services and thus the plan has been presented in this format.

Recommendations:

The Cabinet is requested to:

- 1) Recommend that Council endorse the Coventry's Youth Justice Strategy and Plan – 2021-23 (Update 2022).

Council is requested to:

- 2) Endorse the Coventry's Youth Justice Strategy and Plan – 2021-23 (Update 2022).

List of Appendices included:

The following appendices are attached to the report:

- Appendix 1 - Coventry's Youth Justice Strategy and Plan – 2021-23 (Update 2022).
- Appendix 2 – Equality Impact Assessment

Background papers:

None

Other useful documents

None

Has it or will it be considered by scrutiny?

No

Has it or will it be considered by any other council committee, advisory panel, or other body?

No

Will this report go to Council?

Yes – 18th October 2022

Report title: Coventry's Youth Justice Strategy and Plan – 2021-23 (Update 2022).

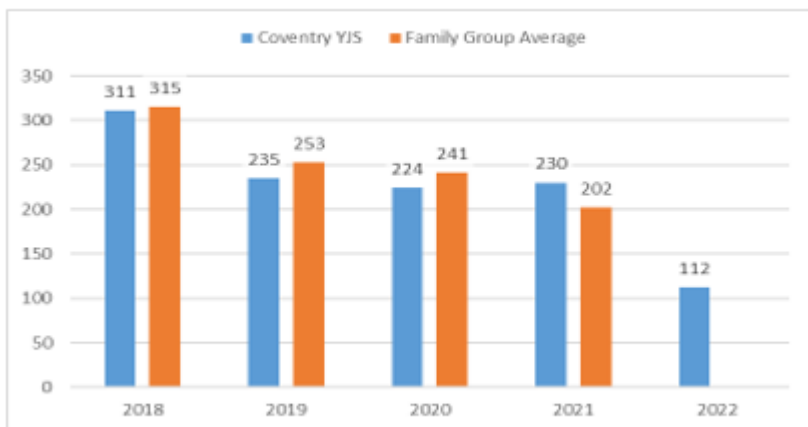
1. Context (or background)

1.1. The plan demonstrates, in line with the Youth Justice Board (YJB) grant requirement, the continued delivery of statutory responsibilities as described in the Crime and Disorder Act 1998 part 111 (section 38). CYJS has submitted the plan in line with the mandated YJB¹ structure. The plan demonstrates the delivery of the Service's statutory functions and the methods for achieving this in line with the grant requirement. This plan provides an updated picture on how the vision is being realized, priorities addressed, and provides a Service analysis and overview. It further outlines: how we engage/work collaboratively with children, families, and victims of crime; governance arrangements; partnership resourcing into the Service; our performance against key priorities; current challenges and risks; our emerging evidence base of best practice; and, how we continue to build on the developmental activities across the city in 2022/23.

1.2 Headlines 2021/22

1.2.1 Performance and outcomes for children, young people, families, and communities²

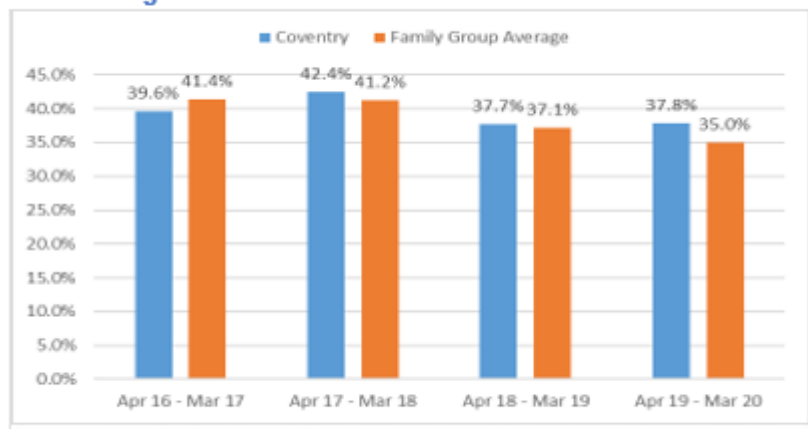
First Time Entrants



The number of children entering the youth justice system has been stable over the last three years but seen a marked decline this year; as a result, the Service has started a new Diversion Offer.

Table 1: FTEs per 100,000 of the 10–17-year-old population, Coventry YJS 2018-22

Reoffending



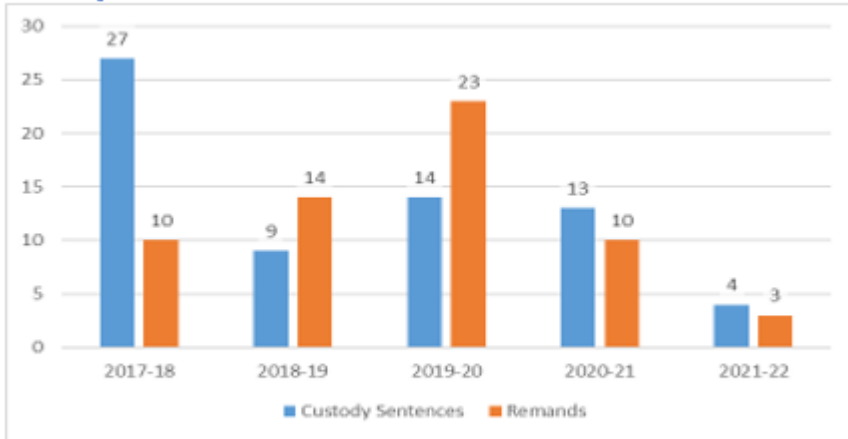
The reoffending rate has remained stable from last year, though it is higher than the Family Group. The number of children reoffending has reduced, but the stable percentage reflects the reduction in the overall cohort size.

Table 2: Children/Young People reoffending within a year, Coventry YJS 2016-2020

¹ Youth Justice Board explanation

² Family Group - a statistically similar comparator group as defined by the Youth Justice Board: Coventry, Derby, Bolton, Newport, Sheffield, Peterborough, Walsall, Leeds, Portsmouth, Southampton, Tameside.

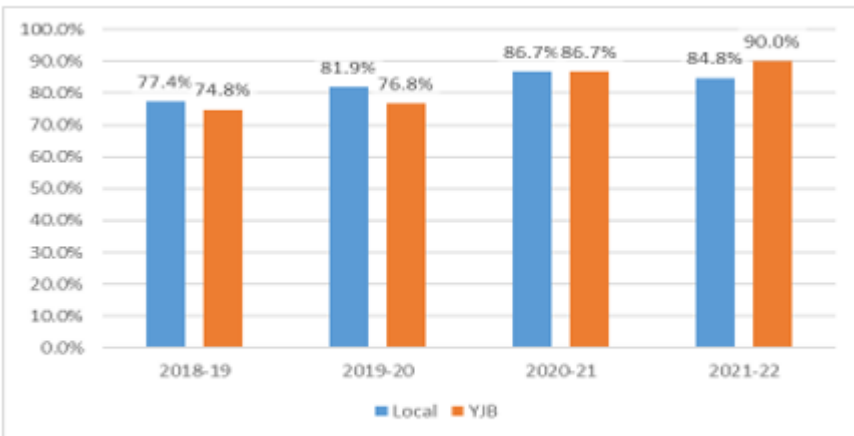
Custody and Remand



There was a significant decline in the use of custody and remand across 2021/22.

Table 3: New episodes of custody and remand, Coventry YJS 2017-22 (10-17 Year old's)

Education, Training and Employment



There is a continued improving trend for children being engaged in education, training, and employment (ETE); however, children in the youth justice system continue to achieve poor academically, compared to the city average.

Table 4: Engagement in suitable ETE by local assessment and by the YJB national standard, 2018-22

1.2.2 Key Achievements

A new name - Coventry Youth Justice Service - and new Diversion Project



Improved mechanisms for child led Service change



Continued disproportionality work leading to operational and cultural changes



A newer workforce bringing exciting ideas, but requiring greater investments in training and development

Development around trauma informed practice and approaches

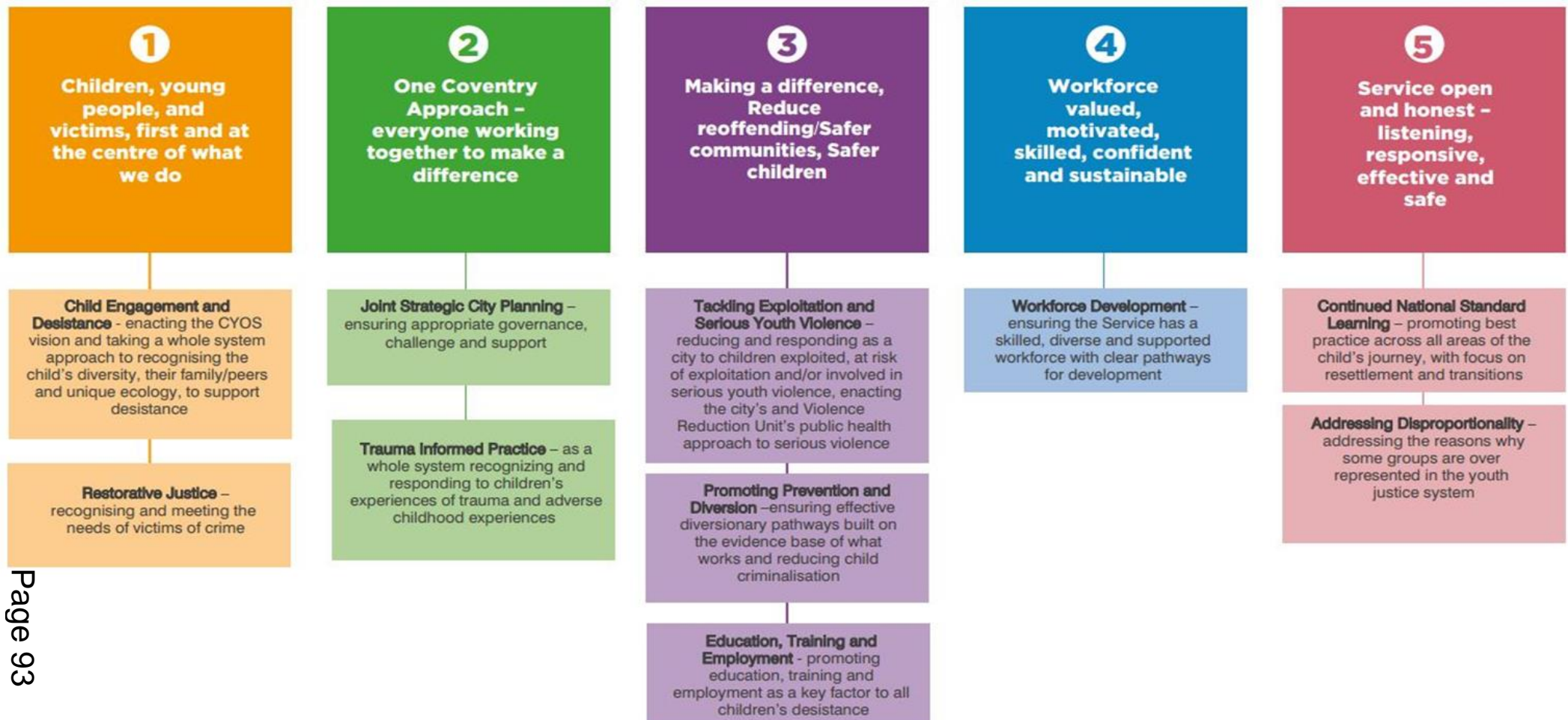


NHS and Youth Endowment Fund investments over the next 3 years



1.3 Our priorities and areas for improvement for 2021/23

The Plan outlines that the Service is working with a smaller, more vulnerable, and traumatised group of children whose needs are very high and who present a significant challenge. Children in the YJS are most likely to be accessing (or have accessed) alternative schooling provision following permanent exclusion, likely to have been a victim of criminal exploitation, residing in a deprived/high risk area and more likely to be from an ethnic minority background. To appropriately tackle these issues, we need: children leading steps for change, a skilled workforce, and a city approach to delivering trauma informed prevention and diversion activity. The plan re-outlines our vision and priorities for the Coventry's Youth Justice System, and how we seek to address these trends and findings.



2. Options considered and recommended proposal

- 2.1. Completion and submission of this plan is a statutory duty under the Crime and Disorder Act 1998. It is requested that Cabinet recommend that the Council endorse the Plan.

3. Results of consultation undertaken

- 3.1. All statutory partners are consulted under a statutory duty imposed by the Act. All Management Board members are consulted and contribute, although only statutory partner's cooperation is required. Additionally, the following methodology has been undertaken to formulate the plan: child/parent consultation on their experience and improvement areas; team consultation on how we achieve desistance for children; data analysis review of the Service and children in the youth justice system; a review of the best practice evidence base; a wider strategic partnership review; and, sharing with partners for feedback and amendments.

3.2. Statutory Members are represented by:

- Director of Children's Services
- Strategic Lead for Help Protection, Children's Services
- Chief Inspector, Coventry, West Midlands Police
- Head of Coventry Delivery Unit, Probation
- Head of Transformation, Coventry and Warwickshire Integrated Care Board
- Associate Director of Operations, Mental Health Services for Children and Young People

3.3. Other members include:

- Head of Environmental Services Street Scene and Regulatory Services
- Operations Manager, Coventry and Warwickshire, Prospects Services
- Chair of The Magistrates Youth Panel
- Head of Service, Education Improvement and Standards
- Head Teacher, Coventry Virtual School
- Violence Prevention - Programme Manager, Public Health Team
- Early Help Manager, Children's Services
- Service Manager, Positive Choices
- Head of Innovation and Engagement, Midlands, Youth Justice Board

4. Timetable for implementing this decision

- 4.1. YJB grant conditions state that receipt of grant is conditional on the submission of a strategic plan. The YJB recognise that local political processes do not necessarily tie in with submission dates and therefore they accept a draft plan, which had to be submitted by the end of June 2021; due to the Coventry Children's Services Ofsted Inspection a 3-week extension was agreed by the YJB, and the plan was submitted in line with this deadline.

5. Comments from Chief Operating Officer (Section 151 Officer) and Director of Law and Governance

5.1. Financial Implications

Grant funding from YJB may be withheld/withdrawn if the plan is not submitted in line with the Crime and Disorder Act and grant requirements.

Youth Justice Service Pooled Budget Changes

Agency	Annual Budget	
	2021-22	2022-23
Local Authority	738,663	745,051
Youth Justice Board	578,470	641,103
Police and Crime Commissioner	105,064	105,064
Health	112,164	129,835
Police	58,235	59,507
Probation	48,400	55,496
Budget	1,640,996	1,736,056

The change to the local authority contribution, Health and Police are because of increased costs (for example, staff spinal points and increments, and budget realignments); the Health, Police and Probation figures reflect '**payments in kind**' through seconded roles and other delegated funds³.

The plan was written prior to the YJB grant announcement and written based on funding being matched to the core grant allocation in 2021-22, as per the advice of the YJB. The grant has now been announced, with an additional one-year uplift for 2022-23 and the table above reflects this. The additional grant awarded will be used to support diversion activity to prevent children entering the youth justice system.

5.2. Legal Implications

Section 40 Crime and Disorder Act 1998 places a duty on the local authority, after consultation with the relevant bodies, to formulate and implement a yearly 'Youth Justice Plan'. The Plan must set out how Youth Justice Services in the area are to be provided, composed and funded, how they will operate, and what functions they are to carry out. Such Plans are submitted to the YJB for England and Wales and published in accordance with any directions issued by the Secretary of State.

6. Other implications

6.1. How will this contribute to the Council Plan (www.coventry.gov.uk/councilplan/)?

The plan's vision is underpinned by the One Coventry Plan. The improvement and business plan (Appendix 1: Section 13-Looking Forward) details the steps over the next 12 months to realise the plan's vision, and in turn the Council's. The activity within the plan is aligned locally to plans that include: Early Help Strategy, Local Police and Crime Board Plan, Safeguarding Partnership Strategy, Coventry Health and Wellbeing Strategy, Children and Young People's Plan, Local Policing Plan, Coventry Sustainable Communities Strategy, and the Coventry Youth Violence Prevention Strategy.

6.2. How is risk being managed?

Risk to the YJB grant, has been managed by consulting with partners in a timely manner to facilitate sign off and submission of the draft plan (grant requirement). The report is also submitted now for endorsement in line with statutory duties and good practice requirements.

6.3. What is the impact on the organisation?

³ Further finance tables are available on pages 63/64 of the Plan providing a breakdown of partner contributions to the pooled budget.

The Plan presents a balanced budget and no immediate implications for other groups. The Plan details the risks going forward in to 2021/23.

6.4. Equalities / EIA?

While this is not a new activity, an EIA has been completed and this identified a positive impact for one or more protected groups, given the detailed progressive actions within improvement/business plan.

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

None.

6.6. Implications for partner organisations?

Partners have all participated in agreement and sign off the Plan and there are no implications arising post sign off.

Report author(s):

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Operational Lead for Coventry Youth Justice Service

Service: Children's Services

Tel and email contact:

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Enquiries should be directed to the above person

Contributor/approver name	Title	Service Area	Date doc sent out	Date response received or approved
Chris Heeley	Strategic Lead, Help and Protection	Children's Services	08.09.22	14.09.22
Georgia Shelton	Accountant	Finance	08.09.22	14.09.22
Lara Knight	Governance Services Officer	Law and Governance	08.09.22	15.09.22
Names of approvers for submission:				
Finance: Tina Pinks	Finance Manager	Finance	08.09.22	14.09.22
Legal: Kate Burke	Solicitor	Law and Governance	08.09.22	14.09.22
Director: John Gregg	Director of Children's Services	-	08.09.22	14.09.22
Members: Councillor Seaman	Cabinet Member for Children and Young People	-	08.09.22	14.09.22

This report is published on the council's website: www.coventry.gov.uk/meetings

Coventry's Youth Justice Strategy and Plan - 2021-23 (Update 2022)



Foreword from the Chair of the Management Board

I am passionate about improving services for children and families. It is clear there is a commitment from politicians, partners, and teams to make a real difference to ensure that children, young people and victims, are first and foremost at the centre of Youth Justice services in Coventry.

We are committed to our One Coventry approach, to tackle issues like exploitation and serious youth violence, with these arrangements maturing and developing to meet need at a strategic and operational level. There is a partnership commitment to trauma informed practice and a commitment to a public health approach through the 10-year Coventry Youth Violence Prevention Strategy.

The 2021-23 plan details how we intend to put the vision and priorities into action with key developmental areas around education engagement, promoting diversion from the youth justice system, addressing disproportionately and continued improvements against the Youth Justice Board's National Standards and HMI Probation Framework.

Our overarching Children's Service's vision is: 'Coventry: together children and families are at the heart of everything we do.'. The Coventry Youth Justice Service vision and priorities seek to put this into action. The next year will build on activity in 2021/22 and seek to continue

progress to divert children from the formal Youth Justice System (YJS), getting in early, reducing criminalisation of children, and supporting to have a community with fewer victims of crime. We will continue to drive improvements to reduce the number of children engaged in offending behaviour and youth violence, the number entering the youth justice system and the number subject to custodial sentences.

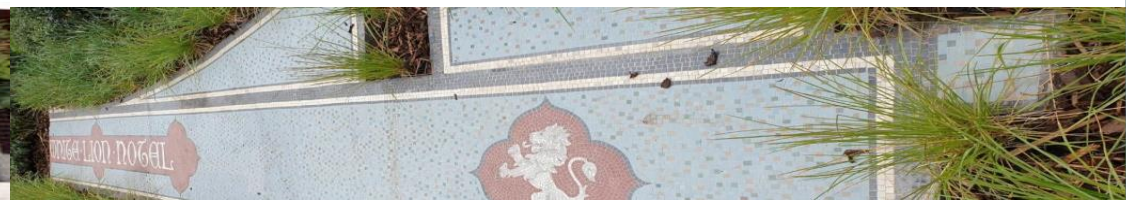
The impact of the COVID-19 pandemic has affected progress, particularly the impact on the workforce; new starters have brought new ideas and experience, though time has rightly needed to be invested in ensuring robust induction processes.

The Coventry Family Valued Programme launched in April 2021, it builds on the successes in Coventry; recognising where there will always be more to do to improve outcomes for children, young people, and their families and to that end I am committed to building a restorative culture. As a partnership in Coventry, we are proud of our achievements and we believe together we can make Coventry a safe, great and enjoyable place to live, grow and work

Service	Coventry Youth Justice Service
Service Manager/ Lead	Nick Jeffreys
Chair of YJS Board	John Gregg



John Gregg
 Director of Children's Services
 and Management Board Chair



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Executive Summary

This plan is the update to the 2021-23 Youth Justice Strategy and Plan. The 2021-23 Plan outlined the priorities and vision for Youth Justice Services in Coventry for a two-year period. This plan provides an updated picture on how the vision is being realized, priorities addressed, and provides a Service analysis and overview using the template mandated by the Youth Justice Board¹. It further outlines: how we engage/work collaboratively with children, families and victims of crime; governance arrangements; partnership resourcing into the Service; our performance against key priorities; current challenges and risks; our emerging evidence base of best practice; and, how we continue to build on the developmental activities across the City in 2022/23.

2021/22 Key achievements and Headlines

A new name -
Coventry Youth
Justice Service -
and new Diversion
Project



Reduction in
children in the
Youth Justice
System, custody,
and remands



Concerns
around
exploitation and
urban street
gangs



Continued disproportionality
work leading to operational
and cultural changes



A newer workforce bringing exciting
ideas, but requiring greater investments
in training and development

Development
around trauma
informed practice
and approaches



Improved
mechanisms for
child led Service
change



NHS and Youth
Endowment Fund
investments over
the next 3 years



The Plan outlines that Coventry Youth Justice Service is working with a smaller, more vulnerable, and traumatised group of children whose needs are very high and who present a significant challenge. Children in the YJS are most likely to be accessing (or have accessed) alternative schooling provision following permanent exclusion, likely to have been a victim of criminal exploitation, residing in a deprived/high risk area and more likely to be from an ethnic minority background. To appropriately tackle these issues, we need: children leading steps for change, a skilled workforce, and a city approach to delivering trauma informed prevention and diversion activity. The update improvement and development plan outlines, against the priorities, how we seek to address these trends and findings.

¹ Youth Justice Board explanation

Introduction

Youth Justice Services were established under the Crime and Disorder Act 1998 with the principal aim being to prevent offending behavior by children. The Act imposed a duty on each local authority together with its statutory partners, Police, Health and Probation, to ensure that adequate Youth Justice Services are available in their area.

The key tasks of the service are:

- Management and delivery of community sentences
- Assessing and delivery of Out of Court Disposal interventions
- Assessing and delivery of diversion² support to children at risk of entering the Youth Justice System.
- Management and delivery of secure estate sentences and resettlement
- Servicing the Youth Court and Crown Courts (in terms of provision of the court team, Bail & Health Assessments, provision of Pre-Sentence Reports and Stand-down Reports)
- Parenting services and management of Parenting Orders
- Victim services

The legislation also imposed a duty to complete and submit a Youth Justice Plan each year. The Act states that the Youth Justice Plan should set out how youth justice services in their area are to be provided, funded, the leadership and governance arrangements, and as well as key information about the Service to ensure quality and effective youth justice services.

This Plan will provide an update on activity on the 2021-23 vision and priorities. The Plan follows a newly prescribed template by the Youth Justice Board that sees some areas re-presented as per the initial Plan. More generally, it will present an updated analysis and what has been achieved against the priorities, alongside the next steps through an

updated business and improvement plan; this will detail how the CYJS vision and the following national outcome indicators will be achieved:

- Reduce the number of children in the youth justice system
- Reduce reoffending by children in the youth justice system
- Reduce the use of custody

Alongside, local agreed performance indicators that evidence positive outcomes for children, young people, and victims of crime and/or the mechanisms to achieve this, namely:

- Reduce incidents of serious youth violence in the city and reduce the number of children presenting at A&E for such injuries.
- Reduce the re-arrest/live reoffending rate for children exiting the youth justice system.
- Reduce risk judgements for children in the youth justice system.
- Reduce racial disparity for children in the youth justice system
- Improve ETE engagement and attainment for children in the youth justice system.
- Improve access to mental healthcare provision for children in the Youth Justice System; % in need compared to % accessing.
- Improve feedback from children/family/parents and victims of crime
- Improve Management Board Attendance at a Senior Level.

To ensure a robust and up to date picture is presented, a repeat of last year's methodology has been undertaken but with a focus on reviewing the activity under the agreed priorities and vision; in doing so, ensuring these remain fit for purpose and remain in line with Youth Justice Board's Strategic Plan 2021-24³.

This plan has been written alongside existing plans and strategies across the city in recognition that a whole city approach is required to achieve the outcomes outlined. The Plan is also subject to Coventry City Council Cabinet and Council endorsement.

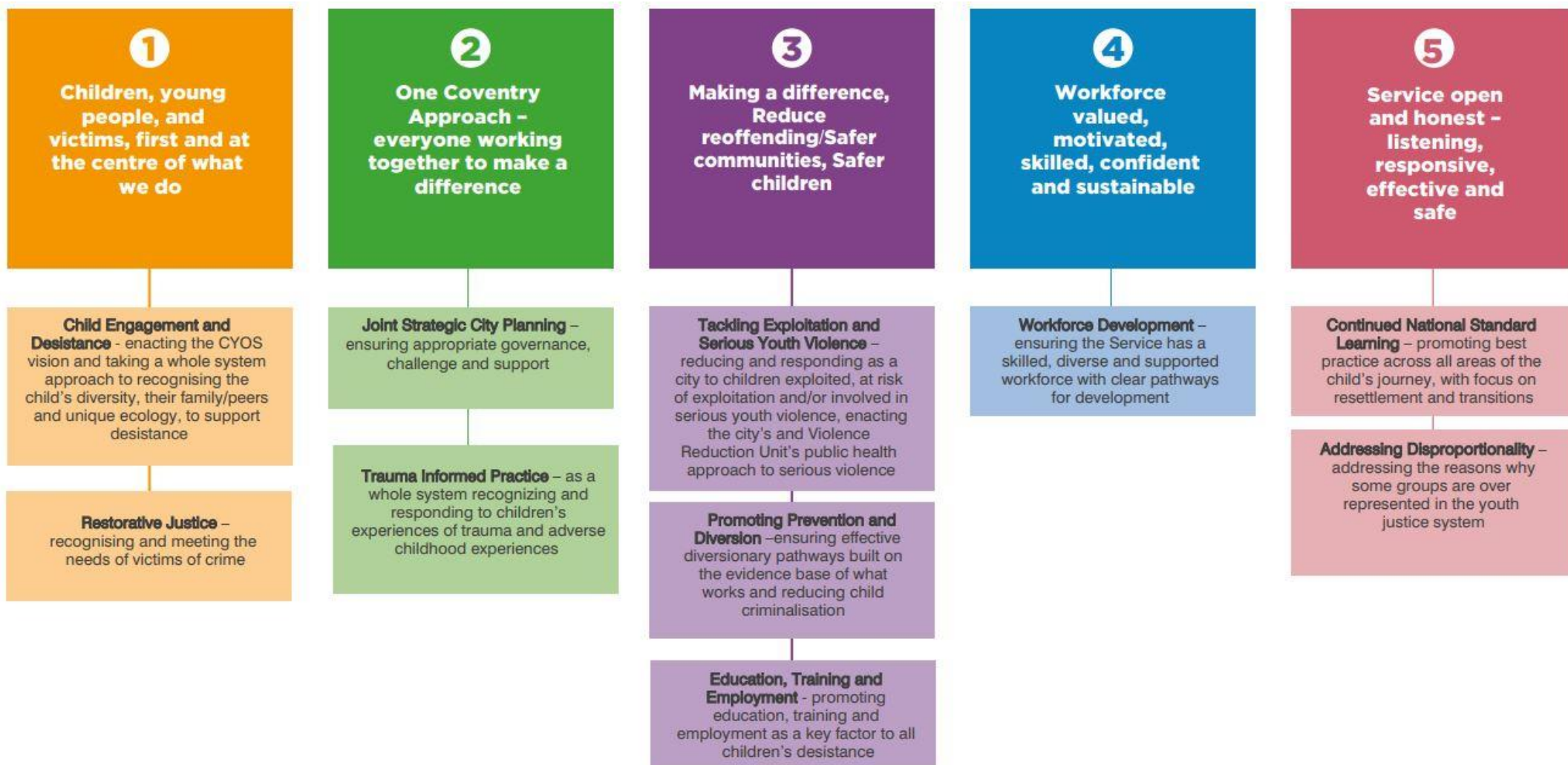
² Definition of diversion as per YJB doc

³ www.gov.uk/government/publications/youth-justice-board-for-england-and-wales-strategic-plan-2021-24

CYJS Vision and Priorities 2021-2023

Coventry Children's Services vision: together children and families are at the heart of everything we do.

CYJS's vision complements the wider Children's Service's Vision and YJB 'Child First, Offender Second' approach in aspiring to create: *'A youth justice system that sees children as children, treats them fairly and helps them to build on their strengths so they can make a constructive contribution to society. This will prevent offending and create safer communities with fewer victims.'* (YJB Strategic Plan 2021-24). Our vision is realised through the priorities and the actions in the improvement and business plan in Section 13. The vision and priorities have collaboration, celebrating diversity, taking a whole systems approach, and addressing inequalities (including structural) at the centre.



Local Context

Just over **one-fifth** of Coventry's population, or **79,765 (21.5%)** are children and young people under the age of 18 years.

This is slightly higher than national (England) rate (21.4%), but lower than the regional (West Midlands) rate of 21.9% and the metro area (West Midlands Combined Authority) rate of 23.8%. It is, however, higher than the sub regional (Coventry and Warwickshire) rate 20.8%.

Of Coventry's children and young people population:

- 22,757 are under 5
- 28,844 (aged 5-10)
- 20,684 (aged 11-15)
- 7,480 (aged 16-17)



Coventry is a diverse city and is expected to become even more diverse, with nearly half of Coventry Pupils from BME backgrounds. According to the latest school census, **53.1% of Coventry's school children are from BME background**, up from 39% in 2011.

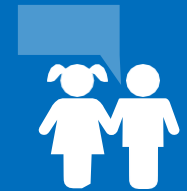


- 11 children were living in a privately fostered arrangement
- 1535 open early help assessments (across the partnership)
- 493 children are supported by a child protection plan
- 1580 children in need
- 752 children are in care
- 578 care leavers



The proportion of children and young people with English as an additional language:

- In primary schools is **34.4%** (the national average is **21.3%**)
- In secondary schools is **32.5%** (The national average is **17.1%**)
- In special schools is **28.6%** (the national average is **14.8%**)



As at January 2020 source data

The proportion of children entitled to free school meals:

- In primary schools is **18.3%** (the national average is **17.7%**)
- In secondary schools is **19.2%** (the national average is **15.9%**)
- In special schools is **41.3%** (the national average is **40.1%**)



As at January 2020 source data

85 primary schools/academies,

21 secondary schools/academies,

1 all thorough school/academy,

8 special schools/academy,

1 nursery school, **1** PRU's.

These figures include **51** academies and **4** free schools.

166 Ofsted registered childminders

101 early years settings



% Of care leaver FTE figures aged 17-20 is **64.3%** compared to 49.8% in 2020/21.

Compared to Statistical Neighbours **51.1%**, West Midlands **54.3%**, and England average **56%** (2019-20)



382

pupils educated at home



Coventry is on a relatively small footprint (98.65 km²) and with an estimated population in mid-2019 of 371,521 residents; this makes Coventry the 9th largest city in England in terms of population.

MASH

contact timeliness is **98.3%** compared with **98.5%** in 2020/21 and **92.8%** in 2019/20



Coventry is identified as a 'Marmot City'. **14.4%** of Coventry areas are identified as being in the most **10%** deprived in England. **Over one-third (37%)** of Coventry children live in low-income families.



29 Unaccompanied asylum-seeking children (as at end December 2021)



190

mainstream fostering households. And 24 new fostering households approved in 2020/21 (as end December 2020)



Child First

The CYJS Vision is the local ratification of the YJB's Child First approach. The approach is underpinned by an evidence base developed by Professor Stephen Case, an expert in criminology at Loughborough University. The approach is based on the latest research on best practice and underpinned by four tenants for service delivery outlined with the Youth Justice Board's Strategic Plan 2021-24, namely:

1. *Prioritise the best interests of children and recognising their particular needs, capacities, rights, and potential. All work is child-focused, developmentally informed, acknowledges structural barriers and meets responsibilities towards children.*

We reflect our commitment to ensuring children's voices are at the centre of our decision making through our first vision statement and our commitment to addressing disproportionality where children are overrepresented in the criminal justice system as a result of structural inequality.

2. *Promote children's individual strengths and capacities to develop their pro-social identity for sustainable desistance, leading to safer communities and fewer victims. All work is constructive and future-focused, built on supportive relationships that empower children to fulfil their potential and make positive contributions to society.*

Our focus on trauma informed practice evidences our commitment to working relationally and empowering children through prioritising access to education, training, and employment in recognition that this is consistently identified as key factor for a children's desistance, key to facilitating pro-social identity change and building on children's areas of interest/strength

3. *Encourage children's active participation, engagement, and wider social inclusion. All work is a meaningful collaboration with children and their carers.*

Our focus on engagement with children, families and victims is central to our vision and strategy, with additional recognition that such a commitment cannot be isolated to the Youth Justice Service alone but across the whole city through a joined up One Coventry approach.

4. *Promote a childhood removed from the justice system, using pre-emptive prevention, diversion, and minimal intervention. All work minimises criminogenic stigma from contact with the system.*

We pledge to committing to diversion and minimal intervention approaches to ensure that children are not unduly criminalised, and recognise that the community and social capital are imperative in tackling issues like serious youth violence and exploitation.

Voice of the Child



Current Approaches to Child Feedback

There are varied routes for co-creation/participation with children and families covered below. Routes have been explored to facilitate feedback at specific junctures, collaboration into decision making and ensure that methods support participation with all children in the YJS.

Through Our Eyes

Started in 2021/22, a quarterly feedback group led by a local charity, Guiding Young Minds, and the local Youth Commissioner. These sessions take place at a local youth club (Coventry Boys and Club) and sees children open to CYJS give feedback on their experiences, self-assess the Service, and discuss pertinent issues individually/collectively to improve the Service. The sessions are facilitated externally to encourage and facilitate more honest feedback.

The group was named through the first session in January 2022, which was also supported by the Children's Participation Team and involved an initial self-assessment on the Service. The participation team fed back using the Participation Standards a framework for self-assessment⁴. This identified that the 7 standards were being met, although participation was often 'adult initiated' rather than there being standalone pathways for unprompted feedback.

The cohort was aged between 15-18. Feedback was clear in that children felt they were being listened to, treated fairly, had good communication and workers were easy to get hold of, and they felt comfortable to share honestly. Children commented that their interests and strengths were built on; one child provided an example of stating that they were interested in boxing, and this later became part of their intervention. Children fed back that they liked having female workers as they found that they were nurturing and caring.

Children reflected on that support was available, but that ultimately it was they have the ability to make choices and choosing to not reoffend was down to them. Children reflected on the value of restorative work opened their eyes to impact on others both indirect and direct victims.

There were several areas for consideration, namely:

- Having sessions in community hubs and wanting a YJS office in each area
- Court process is difficult to navigate
- Having access to people with lived experience

All but 1 child reported they felt listened to. All children were able to identify how their worker supports their needs, e.g., follows up on things for them, changes locations of appts, takes out of the house where I can speak, uses preferred gender pronouns, sessions planned at times that suits them, offered transport where possible.

⁴ Children and Young People's Participation in Wales ... Good Practice 2016: 'were used as the self-assessment tool. <https://gov.wales/sites/default/files/publications/2019-06/good-practice-guide.pdf>

Page 106 Voice of the Child

in response to the areas of consideration the following steps have been undertaken:

- 6 Coventry has 8 Family Hubs, and these have been re-promoted across the team – while these are not additional YJS offices, they are community spaces where 1 to 1 session can take place, alongside charity/third sector venues (see Section 5).
- The CYJS Court Assistant Officer now contacts all children/families as soon as we are notified of a court listing to offer support/guidance through the process.
- The Office of the Police and Crime Commissioner Grant used in 2021/22 for community mentoring, across 2022/23 will also see children at medium/high risk of exploitation be offered funded mentoring to ensure that offers for people with 'lived experience'⁵ comes early.

A second session has now been held in April 2022 with the findings feeding into The Plan (Section 13); this has also included some 1 to 1 sessions led by Guiding Young Minds for children who have not been able to/wanted to engage through a group setting. The group will continue to meet quarterly, and feedback will be presented to Board with ongoing consideration for encouraging direct feedback from children to Board and that clear actions are taken in response; the group moving forward will be considering /discussing key issues/themes planned for Board.

For the Plan

In 2021/22, CYJS undertook a consultation with children and families open to the Service at the time to see what has worked well and what could be improved; several key themes emerged, namely: taking the service to children (home visits), adaptability, the importance of relationship building, diversity in offer of workers, and the value of learning about victims and impact of offending. These key themes supported the formulation of our 10 priorities and, to ensure these remain

⁵ <https://yjresourcehub.uk/training-and-workforce-development-resources/item/1001-lessons-learnt-from-essex-lived-experience-workforce-development-programme-county-lines-pathfinder-january-2022.html>

appropriate, the exercise was undertaken again during April 2022. Some of the key themes that emerged were similar to feedback through our Through Our Eyes sessions, namely: the majority of children felt listened to and that the right support was in place with several children, accessing YJS CAMHS support, complimenting how useful this was.

Areas of worries for children were orientated to access to education, training, and employment and/or other meaningful activities; and the importance of professionals understanding the lived experience of children and community challenges around serious youth violence; and a normalized view of 'postcode wars'. These specific learning points have fed into the improvement and development plan, but the feedback offers assurances that the priorities continue to be appropriate.

End of Intervention Feedback

For all children closing to the Service, an offer will be given to attend an end of intervention feedback session where appropriate (as assessed by the YJS Officer)⁶ facilitated by an experienced Sessional Worker.

This gives opportunity for the child to reflect on the impact of their work with CYJS, looking at the workers they have engaged with, the overall service delivery, and supporting with closure planning. The feedback document was devised in conjunction with the Children's Champion in the Partnership Team. The document seeks to draw upon qualitative, quantitative and distance travelled methods/processes from the start of the journey to the end. For families/children who have attended, a 4-6 month check in will be offered as an opportunity to review outcomes and to celebrate successes.



⁶ For example, a child who finds it difficult to meet new people.

Voice of the Child

This pathway has seen 20 children engaged through these sessions and approximately a 50/50 split of children open to Out of Court Disposals verses Court. Children who did not wish to engage in the feedback sessions will have also had opportunity to engage in a written self-assessment in replacement of the sessions. Feedback through these sessions reflected: the value of opportunities to access mentoring, supporting into education pathways, and the value of having a committed and caring worker. Some children reflected that despite feeling that they might be judged and wouldn't get anything out of their order/ interventions, found that the opposite was true: *"Out of a negative experience came a positive outcome"*. This appears to evidence the focused efforts on developing more trauma informed ways of working centered through one relationship resulting in children's not having to repeat their stories.

The key area of feedback was around some children preferring younger workers, albeit also commenting that the workers were supportive/non-judgmental. This feedback has been consistent, as captured within the Workforce Development Strategy 2021-23, and considerations to ensure a greater diversity of offer is explored in Section 7.

Viewpoint

Across the last year, the team has been embedding the use of Viewpoint when children and parents complete self-assessments as part of the ongoing assessment process. Now that this approach is embedded, and a new worker as Child Engagement and Development Officer is in post, a Service wide analysis will be undertaken on a 6 monthly basis to identify key themes for improvement/development.

Recruitment

CYJS has over the last year worked with the Participation Team to ensure that children's voices are at the forefront of the recruitment process. This has seen a representative from the team involved in all recruitment processes over the last year.

Support best practice and research

While prioritizing approaches to support local collaboration, CYJS has also supported several research projects over the last year through the Office of the Police and Crime Commissioner, HMI Probation and other research hubs supporting Coventry's children's input into wider system change and support internal learning (see Section 12).

100% of children did not think there was anything further we could do to support them. One child commented that 'having relationships works the most'.



Next Steps:

The last year has seen a new post created: Child Engagement and Development Officer. Over the coming year, they will lead on furthering engagement routes, ensuring that pathways for unprompted feedback are strengthened, and lead on responding to the learning identified above; these actions are as outlined in the Plan - Section 13.

Governance, Leadership and Partnership Arrangements

In line with the requirements of the Crime and Disorder Act (1998) and revised guidance from the Youth Justice Board for Youth Justice partnerships 2021, CYJS Management Board oversees the justice services, monitoring and actioning around the quality and effectiveness of child justice services across Coventry.

The Youth Justice Service is part of Children's Services; this is in recognition of the needs of the children in the YJS and the need for coordinated responses for such children; this has most recently been outlined in the 'Independent review of children's social care'. The Head of Service has the Youth Justice Service as a single portfolio and is line managed by the Strategic Lead (Assistant Director) for 'Help and Protection' services, which includes the exploitation team who YJS share an office with. The Management Board is currently chaired by the Director of Children's Services designated by the Chief Executive. The Board has cross cutting members, at a senior level, across the statutory and non-statutory strategic boards and groups championing the CYJS vision and priorities, for example:

- Early Help Strategy 2020-2022 –Outcome 6: 'Parents and young people involved or victims of crime and/or anti-social behaviour is reduced'
- Police and Crime Board – Priorities – 'Reducing re-offending and harm' and 'exploitation and serious youth violence'
- Schools Violence Reduction Strategy and Plan– 2020-2029
- Safeguarding Children Partnership – Priorities 2022-2023 - 'Exploitation'
- Health and Wellbeing Board – Health and Wellbeing Strategy 2019-2023 – 'Children and young people fulfil their potential'
- Safeguarding Adults Board - Priorities 2019-2021 - To be assured that services and agencies have appropriate systems, processes, and training in place to support and safeguard adults effectively.

These cross-cutting priorities ensure that the priorities and vision are seen as a city responsibility and challenge, as outlined in the 'One Coventry' approach and the council's values:



Governance, Leadership and Partnership Arrangements

CYJS Management Board

CYJS has the appropriate agencies and statutory representation on the Management Board, as detailed within the Board Members list in the appendices (appendix 1). Alongside the key Statutory Partners, CYJS also benefits from the attendance of the Chair of the Youth Court Bench, the Head of Education Improvement and Standards, Service Manager for Positive Choices (Substance Misuse Agency) the Headteacher of Coventry Virtual School, Operations Manager for Coventry & Warwickshire Prospects⁷ Service, the Head of Environmental Service Street Scene & Regulatory Services, Programme Manager for the Violence Prevention (Public Health Team) and Early Help Manager for Children's Services, and as required attendance from relevant Secure Estates, Chair of the Coventry Youth Partnership and agencies as required for updates. The Board is well supported by the YJB and Partnership Advisor. The board discharges its duties by:

- Requiring the CYJS Operational Lead and partners to report and account for performance against national and local indicators that evidence positive outcomes for children. Advanced reports are provided on performance, Probation transfers, Education (School Age), Education (16+), Health, Positive Choices (Substance Misuse agency), and the Police. Each report acts as an update from each agency of their activity across the last quarter.
- Oversight of budget and staffing structures to ensure that the service is adequately resourced
- Commissioning (internally) specific projects, research, and evaluation of aspects of service delivery
- Quality assurance, oversight and monitoring of plans, including those, which emerge from community safeguarding and public protection incidents
- Scrutiny of compliance with YJB grant conditions, including timeliness of data submission and connectivity via Management Board meetings and access to YJB reports.
- Strategic ownership and sign off of the Annual Youth Justice Plan

Management Board have continued the process of development, and this is covered in Section 11. Coventry has a 10 Year Youth Violence Prevention Strategy with a partnership owned action plan. The aims of the strategy and partners response is to act as a One Coventry response through a Public Health approach to the issue of youth violence. This Plan will be carried forward into the development of the Serious Violence Duty. The 10-year plan will form the public health approach foundations for the serious violence plan across the City in response to the Serious Violence Duty.



⁷ Prospects is the local service to support 16-24 year olds at risk of, or not in, education/training/employment - <https://www.prospects.co.uk/Contact-Us/Corporate-Head-Office/Prospects-in-Coventry-and-Warwickshire->

Governance, Leadership and Partnership Arrangements

Over the last year, this has been progressed through an Operational Group; however, following departure of the WM Police (Commander) and Public Health (Director), the new senior leadership team are reviewing the governance arrangements in line with the expectations through the Serious Violence Duty⁸. While the duty remains in draft terms, the duty is not isolated to children or young people; however, with the local commitment to a public health approach is centered towards 'strong foundations and 'prevention' that are equally central to violence more broadly. This review is currently underway, and an updated strategic needs assessment is being commissioned as part of this; this will inform an updated strategy and the current action plan and then reviewing on an annual basis.

The local commitment to the strategy remains strong with the partnership continuing to co-fund a Violence Prevention Programme Manager and an additional Local Authority funded post in a Schools Violence Reduction Lead, who leads on the Schools Violence Reduction Strategy. These posts are additional to the locally funded posts through the West Midlands Violence Reduction Unit, namely: Education Intervention Advisor and Faith Communities Navigator & Community Navigator.

Regional Influence:

To further strengthen the responses to children locally, many priorities require regional/national input/influence. To achieve this, there is attendance from the team and/or Management Board to the following meetings:

- Girls Delivery Group
- Criminal Justice Liaison and Diversion Strategic Board
- Child Exploitation Board

And, through a rota across regional Youth Justice leads:

- West Midlands Criminal Justice Board
- Regional MAPPA Senior Management Board
- West Midlands Strategic Violence Reduction Board

Additional to this, and in recognition of the need for coordinated responses to issues across the West Midlands Force/PCC area, a regional Youth Justice Subgroup has been set-up in 2022 as an arm of the Criminal Justice Board; this will enable the streamlining of regional matters, a clear regional strategic escalation pathway for governance of youth justice matters, and a regional decision-making forum for priorities.

Operational Interplay: The interplay between regional, statutory boards and violence prevention board enables strong operational interplay. Members of the team, managers and Board participate in a number of operational groups, including, but not limited to:

- The Contextual Safeguarding Subgroup and Operational Group
- Coventry Reducing Re-offending Board
- Channel Panel (PREVENT)
- Drug & Alcohol Steering Group
- The Coventry Youth Partnership
- Coventry Serious Youth Violence Forum
- Child Sexual Exploitation Operational Group
- Vulnerable and Missing Panel
- Child Exploitation and Missing Triage
- Liaison and Diversion Service Programme Group
- Youth One Day One Conversation
- Education and YJS Action Group/Working Party
- Coventry and Warwickshire Youth Panel Meeting
- School and Police Panels Meeting
- Multi-agency Risk Assessment Conference (MARAC)
- Multi-Agency Public Protection Arrangements (MAPPA)
- Fair Access Panels
- Serious and Organised Crime Joint Action Group (SOCJAG)

In addition to the above, there are also a number of champion leads across the Service including: Gangs, Child Engagement and Child Sexual Abuse. These champion leads support consistent practice across CYJS, developing their own expertise and supporting wider practice development.

⁸ Serious Violence Duty - <https://www.gov.uk/government/publications/police-crime-sentencing-and-courts-bill-2021-factsheets>

Governance, Leadership and Partnership Arrangements

Partnership and Secondment Arrangements:

The Local Authority is represented by the Director of Children's Services and Strategic Lead for Help and Protection the relationship has proven effective in:

- the role of CYJS Management Board Chair providing challenge and support to partners
- ensuring that the YJS is appropriately profiled in key forums,
- representation at West Midlands Strategic Violence Reduction Board
- Securing partner engagement and development activity; for example, resourcing into an exploitation hub.
- Overseeing the partnership arrangements protocol
- The Service has 5 qualified Social Workers within the Service

The Probation Service are represented on the Management Board by the Head of Coventry Probation Delivery Unit. This relationship has proven effective in:

- Providing information specific to transitions; for example, re-offending and engagement rates for young people post transfer
- Ensuring appropriate support is available to care leavers
- Facilitating joint audits across CYJS and Probation to ensure a continued learning feedback loop
- Overseeing the joint protocol and ensuring appropriate Probation resourcing into the Service
- The Service currently has 1 Full-time Probation Officer seconded in the Service who started in March 2020 on a three-year cycle.⁹

West Midlands Police are represented by one of Coventry's Detective Chief Inspectors. CYJS also has a named Inspector and Sergeant to support the Integrated Offender Management activity and Out of Court Disposals. This relationship has proved to be effective in:

- Securing close partnership working and high-level information sharing to support reducing youth violence and exploitation
- Increased police resourcing into the Offender Management and the local Youth Violence Reduction Team to support the preventative agenda
- Supporting the delivery of a point of arrest diversion offers for children
- Overseeing and ensuring appropriate Police resourcing into the Service, including the service level agreement, secondment arrangements and operational processes.
- The current seconded Youth Crime Officer has been in post since 2017. While secondment is not time limited, the arrangements will be jointly reviewed against the Youth Justice Board Guidance (last completed in 2018) as needed (e.g., where performance issues arise). A

Coventry and Warwickshire Integrated Care Board (ICB) is represented on the CYJS Management Board by the Head of Transformation (Children and Young People). The Coventry and Warwickshire NHS Trust is represented by the Associate Director of Operations, Mental Health Services for Children & Young People. CYJS continues to benefit from currently hosting two health staff (2 full time equivalents). Clinical supervision is offered via CAMHS. These relationships have proven effective in:

- Supporting the embedding of Trauma Informed Practice both in terms of facilitating formulation meetings, and consultation with CAMHS to inform the development of this area of practice
- Development of a broader health approach
- Development of the Health economy training pool
- Overseeing and ensuring appropriate Health resourcing into the Service, these secondment arrangements and working arrangements.

The ICB and YJS are currently in the process of recruiting a seconded Speech and Language Therapist; this is being progressed as part of the Trauma Informed Recovery Support (TIRS) Framework - see Section 7.

Education is represented on the Management Board by the local Head of Service – Education Improvement and Standards – and by the Operations Manager (Young People & Families Coventry and Warwickshire) for Prospects. CYJS have an employed Education Lead role, who is a qualified teacher, and a Senior Careers Adviser within Prospects (not seconded).

⁹ Probation Support Officer, which will see the Probation Officer post change to a 0.7 full-time equivalent and Support Officer as a 0.3 full-time equivalent

Governance, Leadership and Partnership Arrangements

These relationships have proven effective in:

- Ensuring that pathways for ETE are explored and monitored for all children in the young justice system
- Securing appropriate resources and services to meet the needs of children and young people
- Having strategic oversight of the key barriers to ETE engagement and appropriate senior buy-in to address/tackle these
- Overseeing the education arrangements protocol and relevant service level agreements.

Other partnership arrangements:

Community Safety are within the Local Authority, with a particular operational focus on exploring preventative and civil powers, for example, Public Space Protection Orders.

Courts provide regular feedback, which continues to be very positive. CYJS and the Deputy and Chair of the Youth Panel, have a close working relationship outlined in the Service Level Agreement.

Early Help provide a targeted Youth Worker offer across the city, which is being piloted for all children given a first Police Only Community Resolution; this is following learning for children entering custody as first-time entrants. The 8 Family Hubs continue to be used as additional deliver sites for CYJS.

Citizen Housing has a well-established working relationship with CYJS, with particular cross over around the use of acceptable behaviour contracts and other joint planning/management.

Positive Choices provides substance misuse support for children (along with other offers); CYJS benefits from co-location of a lead worker and clear working arrangements through the updated service level agreement and revised commissioning arrangements.

Other Providers/local organisations:

St Giles (National Charity) offer children mentors with lived/relevant experience and have a particular focus on resettlement support. They have a City Center hub and have worked closely with CYJS (over the last few years), particularly with increasing concerns around youth violence and exploitation.

Positive Youth Foundation (Local Charity) based in the Hillfields area, deliver several sports based mentoring offers: with a particular focus, through the Levelling the Playing Field Project¹⁰, on supporting children from Black, Asian and Minority Ethnic Backgrounds.

First Class Legacy (Regional Charity) are currently exploring disproportionality and racial inequality across the team and running a regional peer parenting project¹¹ explored in detail in Sections 7 and 9.

Guiding Young Minds (Local Charity) with a mobile youth club bus in the city they offer mentoring, with a particular focus on supporting children where CYJS has not successfully engaged the child/family.

Coventry Boys and Girls Club (Local Charity) offer sports and/or music-based mentoring through a newly equipped youth club based by Coventry University.

Aptitude CIC offer sports and/or music-based mentoring delivered through a youth club in the Radford area of the city.

This is not an exhaustive list but evidences the progressive partnership working with field 'experts' to improve the offer to Coventry's children, ensure there are localized offers considering the articulated worries by children on postcode/areas issues (see Section 4), and increase the diversity offer to children.



¹⁰ <https://levellingtheplayingfield.org/>

¹¹ <https://youthjusticeboard.newsweaver.co.uk/yots2/1arsemirciu1df4hdy7b24?lang=en&a=1&p=57921336&t=21098815>

Governance, Leadership and Partnership Arrangements

Workforce Overview

Workforce Demographics

As of the 1st April 2022, the YJS workforce has total 19 permanent staff, down from 23 reflecting current vacancies; a full breakdown is provided in the appendices (see appendix 3). The YJS has had a higher turnover rate than last year (28%), higher than the City Council rate of 13.5%; the small size of the Service does impact on changes year by year. The difference reflects 2 staff retiring, 1 staff member changing careers (all over 20 years with the Service), and 3 staff who joined the year previous re-evaluating their choice to work in Youth Justice and moving to different areas of work; learning has been taken from the latter around ensuring the induction is as integrated into the team and robust in nature, though it is a significant factor that all three started during the Covid 19 pandemic (not a trend isolated to the Service¹²). Sickness levels, while impacted by Covid 19, remained similar to last year (8.99) at 8.27 days lost per full time equivalent, lower than the City Council average at 13.25 days.

The staffing cohort is very diverse in experience with 58% having 6+ years' experience in the Service and 47% 11 years or more. The current workforce demographic profile is not fully reflective of the community; the YJS has 79% female staff, a 1% difference from last year and 26% (5) have a self-reported ethnicity of Black, Asian, and Minority Ethnic; the same figure as last year. There is a commitment to ensure that the nature and diversity of the workforce responds to local needs, as discussed in Section 7.

Workforce Learning and Development

Over the last two years, CYJS has introduced Senior Practitioner roles within the Service (see appendix 2). This post provides improved connectedness between strategic priorities and operational delivery with the role acting as bridge between direct delivery/management; examples are detailed in Section 7. While new starters have brought huge experience (Social Work, Multisystemic therapy, and the charity sector), inductions into the Service and knowledge upskilling have incurred significant team/manager investment. This will continue over the next 12 months as roles are recruited to and to achieve a stable workforce.

CYJS has a Training Planner following the Service completing the YJB's Youth Justice Skills Audit for Youth Justice Practitioners¹³ in early 2021. This comprehensive exercise was completed by Coventry YJS practitioners and supported the development of a service specific workforce development strategy (2021-23), alongside the wider Children's Services strategy. The priorities identified and actions from this have fed into the progression under the priority of 'Workforce Development', detailed in Section 7. The workforce strategy articulates the pathways for development within the Service. CYJS currently has two YJS Officers who have successfully completed the Social Work Degree Apprenticeship, two students on placements (Social Work and CAMHS), a Team Manager completed a Level 5 Management and Leadership Apprenticeship, and the Operational Lead has led a Peer Review for another YJS. CYJS has recruited 1 YJS Officer and 1 YJS Support Officer over the last year, with all practitioners completing/completed the Youth Justice Effective Practice Certificate; the qualification is endorsed by the Youth Justice Board and brings together the most up-to-date thinking, knowledge, research, and evidence about what works in this field.



¹² An international trend named 'The Great Resignation'

¹³ <https://yjresourcehub.uk/workforce-development/item/619-youth-justice-skills-matrix.html>

Resources and Services

Budgets 2022/23

CYJS funding consists of the City Council budget, YJB Grant and statutory partner contributions. In addition, funding is received from the Office of the Police and Crime Commissioner (PCC) that is additionally used to support diversion/mentoring offers, and all of which sits in CYJS pooled budget (see appendix 3).

This budget enables the continued running of Youth Justice services and as will be outlined, continued improvement as per the CYJS vision, priorities, and Plan (Section 13).

The Community Safety Fund was confirmed on 30th May 2022 by the West Midlands Police Crime Commission (PCC). The payments for services in-kind relate to staffing costs for employees working with the Youth Offending Service and have all been confirmed: Probation, Police, and Coventry and Warwickshire Partnership Trust. Each agency additionally makes a cash contribution to cover expenses of the role for CYJS; the Police contribution is covered by the PCC grant.

The YJB grant has not yet been confirmed, while the YJB and Ministry of Justice review allocations and the funding formulas for Youth Justice Services; however, the YJB have given written assurances that the core grant allocation will at least be matched from last year and the plan is written on the basis of the same contribution.

There has been a slight uplift from last year for the Local Authority contribution reflecting the 2% Pay Award. Last year CYJS received an additional top up grant (and a later small top-up) that funded an interim Quality Assurance Lead in 2021, trauma informed practice

training, one off projects (for example, Round Midnight – see Section 10) an animated video about the Service, and an external review by Lee Westlake (see Section 7). Section 13 outlines how the pooled budget will be used to continue to realise the agreed priorities and local vision, as well as the Services outlined in the introduction; this will in turn meet the objectives outlined within the YJBs Strategic Plan, West Midlands PCC Plan, and the local One Coventry Plan.

Workflow Demands

There has been a continued downward trajectory regarding the number of children in the youth justice system. CYJS has seen a further reduction since last year's average of 73 (2020/21) to an average of 52 (2021/22). The trend reflects a national one, detailed within the latest Youth Justice Statistics 2020/21¹⁴ and the impact of the Covid 19 pandemic. However, with the Covid 19 pandemic easing an increase was expected, though not seen (see Section 7 for performance breakdown).

Invest to save – The reduction in children in the YJS has given opportunity to support children who have been arrested, but where no further action is being taken; this is explored in detail in Section 7. The project has involved new processes and infrastructure. Referrals are direct from West Midlands Police and as the process of embedding referrals improves, this pathway will see a return to caseloads similar to 2020/21 over the coming months. CYJS will progressively recruit to the current vacancies in line with the increasing demand and in the

¹⁴ https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1054236/Youth_Justice_Statistics_2020-21.pdf

Resources and Services

meantime utilises the opportunity to invest in creative programmes to support an Arts Mark Award application in recognition that this will support children to develop strengths and support desistance; see Section 13.

The overall reduction over the last few years has enabled an increased intensity of support, needed to effectively respond to and address children’s experiences of childhood trauma, serious youth violence and exploitation (see Section 8); this includes ‘taking the Service to children’, detailed in the Annual HMIP Report 2021¹⁵, essentially increasing staffing/partnership time per child.

Ensuring good value for money:

The following mechanisms demonstrate the approaches to ensure that funding is used appropriately, and successful outcomes achieved.

Quality Assurance

The updated Quality Assurance Activity Schedule (appendix 4) outlines CYJS’s 2022-23 plan for quality assurance activity with broader actions tracked/progressed through the improvement/business plan. Section 9 covers the responses to the National Standards self-assessment, the localizing of these standards, and the following mechanisms used to ensure the embedment of these, namely: CYJS has held, and will continue, monthly developmental practice workshops, monthly practice reviews, and quarterly team half days. These spaces also provide opportunity for Board Member engagement and team building. The monthly practice reviews provide opportunity to review children where CYJS has not been successfully in achieving engagement, explore this through a trauma informed lens, and agree a plan for resolution; this is chaired by the CYJS Operational Lead or Team Manager and includes, Health, Police, Team Manager and YJS Officers.

Key performance indicators:

The Management Board specifically monitor national indicators:

- Reduce the number of children in the youth justice system

- reduce the use of custody
- reduce reoffending by children in the youth justice system

Alongside, local agreed performance indicators:

- Reduce incidents of serious youth violence in the city and reduce the number of children presenting at A&E for such injuries.
- Reduce the re-arrest/live reoffending rate for children exiting the youth justice system.
- Reduce risk judgements for children in the youth justice system.
- Reduce racial disparity for children in the youth justice system
- Improve ETE engagement and attainment for children in the youth justice system.
- Improve access to mental healthcare provision for children in the Youth Justice System; % in need compared to % accessing.
- Improve feedback from children/family/parents and victims of crime
- Improve Management Board Attendance at a Senior Level.

Monitoring these ensures good value by evidencing positive outcomes for children, young people, and victims of crime and/or the mechanisms to achieve this. The Ministry of Justice are currently reviewing national indicators and any changes will be incorporated to the above measures.

Methodology for the plan

The Plan has been formed through the following steps: 1. Management Board review and planning section. 2. Child/Parent consultation on their experience and improvement areas. 3. Team Consultation on how we achieve desistance for children. 4. Data analysis review of the Service and children in the youth justice system. 5. Assessment analysis of for and against desistance needs for children/adults. 6. Assessment analysis of risk assessment factors for all children/adults. 7. Evidence base best practice review of other YJSs. 8. Wider strategic partnership review and parity to existing strategic plans. 9. Sharing with partners for feedback and amendments.



¹⁵ <https://www.justiceinspectorates.gov.uk/hmiprobation/wp-content/uploads/sites/5/2022/03/FINAL-HMIP-Youth-Annual-Report-2021.pdf> - p.18

Progress on the previous Plan

The 2021-23 Plan outlined the 10 priorities, as detailed within Section 1. The improvement and business plan outlined actions per each priority and updates will be provided identifying key achievement, what is outstanding (why and what will be done), and the outcome measure for the priority.

1. Child Engagement and Desistance

There have been significant developments in this area, as detailed within Section 4. Additional to these aspects, the Service has re-named from Coventry Youth Offending Service to Coventry Youth Justice Service in recognition of the criminogenic impact of 'offending' labels¹⁶; this was following a consultation with children, families, and the team. The new logo was co-designed with a child open to the Service at the time:



Alongside, this we have:

- had several children designing an animated video as an overview of what the Service aims to do, but through the lens of a child.
- completed a leaflet re-design with the Participation Team to ensure that these are more child/family friendly.
- we have continued to review standards in light of the Covid 19 pandemic to ensure continued service delivery and this will remain an ongoing

process: this has seen the retention of some elements of practice – for example, taking the Service to children to support engagement through home visits and utilising local community/family hubs. Section 4 details feedback from children, the outcome measure for this priority.

2. Restorative Justice

CYJS continues to have lead restorative justice practitioners and will contact all victims where consent has been given. The feedback from children in Section 4, iterates the importance of restorative justice and Section 8 details delivery over the last year. CYJS has continued to meet the Restorative Justice (RJ) Council Marker, supported other Youth Justice Teams in their applications/shared best practice and completed a review of services for children who are victims of crime to ensure that access to targeted mental health support is available if needed.

3. Joint Strategic City Planning

A statutory management group has been established that enables greater partnership operational oversight and ownership of the plan. Management Board Members have continued to join Team Half Days to encourage team integration. The local indicators have been reviewed and updated as per Section 6, to ensure that the measures are fit for purpose; this includes the introduction of Board attendance and Section representation. Section 11 details developmental activity with Management Board over the last year, which includes Board Members being identified as sponsors for each priority to facilitate a strategic approach of high support, high challenge. The operational Youth Violence Prevention Partnership Board have continued to lead on the 10 Year Violence Prevention Strategy while the review of the upcoming Serious Violence Duty is undertaken, as detailed in Section 5.

¹⁶ <https://usir.salford.ac.uk/id/eprint/44396/1/Hazel%202017b%20Now%20all%20I%20care%20about%20Summary.pdf>
<https://www.law.ed.ac.uk/research/impact-and-engagement/edinburgh-study-of-youth-transitions-and-crime>

Progress on the Plan

4. Trauma Informed Practice

Coventry and Warwickshire ICB have been successful in securing a regional funding pot, named TIRS (Trauma Informed Recovery Support) Framework. The funding is the NHS's response to the Long-Term Plan commitment of investing in additional services for children and young people with complex needs. The aim of the TIRS framework is to provide child led, strengths based, trauma informed intervention to children who have experienced trauma and adversity but are not currently in receipt of such intervention. The TIRS framework cannot be a panacea for all childhood trauma, and therefore will focus on supporting the following cohorts of children and young people:

- Edge of Care (local team)
- Open to, or at risk of entering, the Youth Justice System
- Out of education or at risk of exclusion (based on local learning)
- Transitioning from the secure estate back into the community

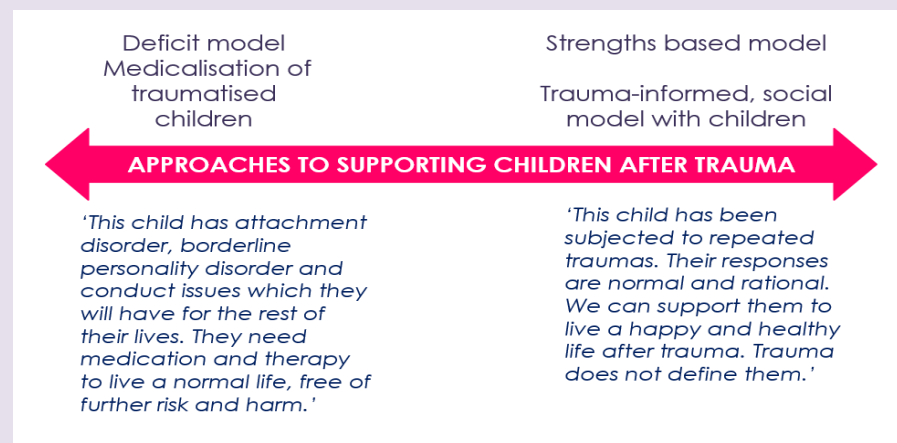
This will see much support in the YJS, but most significantly upstream support for children at risk of entering the YJS. The Child Exploitation and Assessment of Extra Familial Risk Commissioning Strategy has been delayed to sequence with the TIRS framework, as an in depth needs assessment is currently underway that will inform the strategy.

Within CYJS, a review of interventions and training has taken place with an external consultant, Steve Bore Specialist Services¹⁷. This has seen interventions become more trauma informed and reflect on where this was not previously; for example, the Service 4-5years ago would have utilized knife crime injuries as part of a programme that would now be viewed as potentially re-traumatizing and likely to increase a child's anxiety around community violence. It has also supported in re-framing with families and other professionals around re-framing:

Example of speech	Trauma-informed version of speech
'Our daughter does seem very depressed and suffering from anxiety, lately.'	'Your daughter appears to be low and fearful/scared, lately.'
'Ever since he was abused, he has serious attachment issues.'	'Since he was subjected to abuse, he has struggled to trust/form relationships with others.'

This training and review have supported the team in the formulations for why children are engaged in offending behaviour, using the 5Ps model (predisposing, presenting, precipitating, perpetuating, protective) model resulting in more individualized and successful interventions.

There is a commitment in the 10 Year Violence Prevention Strategy to the child's system being more trauma informed that has seen the Violence Reduction Partnership deliver training across primary and secondary schools supporting in moving responses to children from a behavior/medical model response to a more trauma informed one:



Moving forward, the key performance indicator for this area will be: 'improve access to mental healthcare provision for children in the Youth Justice System; % in need compared to % accessing'. This will support in outcome measuring and build on the quarterly Management Board updates the seconded CAMHS team provide to Management Board.

A review, albeit later than initially planned due to staffing capacity, has seen a revision to the specialist CYJS CAMHS pathway with the introduction of a local intensive multi-agency case consultation (IMACC); this model utilized the principles of Enhanced Case Management (ECM), trauma informed practices, systemic principles, and trauma recovery model¹⁸, but provides greater flexibility to meet the needs of children than

¹⁸ The primary model that will underpin IMACC is the Trauma Recovery Model (TRM) (Skuse and Matthew, 2015).

¹⁷ <https://steveborespecialist.com/>

Progress on the Plan

the national ECM model that requires specific resources to maintain efficacy to the model (e.g., clinical psychologist input). The new model will see all children open to the Service being screened and a higher number of children being able to engage in the IMACC process verses the ECM model.

5.Tackling Exploitation and Serious Youth Violence

The last year has seen the operationalization of a local Serious Organised Crime Exchange (SOCEX) that has seen additional policing resources and improving information sharing processes to support in tackling exploitation; plans to co-locate with CYJS/Horizon, has been impacted by the Covid 19 pandemic. Additionally, the Youth Crime Officer attends a daily triage meeting where any instances or issues involving children can be discussed/action planned. These feed into a weekly triage meeting which reviews responses for children arrested over the week/where concerns around exploitation; this will lead to action planning for these children and likely navigating into the most appropriate multi-agency forum¹⁹ as detailed in Section 5. The point of arrest intervention offer has continued from last year (funded by the Violence Reduction Partnership) and expanded over the last year: St Giles, Positive Choices, Positive Choices and offers through the Coventry Youth Partnership. Positive Choices are now delivering a mentoring offer for children identified as low risk of exploitation (considered through the weekly triage meeting) that complements existing support/pathways for children who need statutory arrangements/ existing commissioned offers.

Arrangements across the region have also been strengthened with particularly focus on Warwickshire; see Section 8 that details concerns around county lines from Coventry into Warwickshire. This has been achieved by action planning to tackle county lines/exploitation through the Serious and Organised Crime Joint Action Group (SOCJAG)²⁰.

A Child Criminal Exploitation Profile has been completed and is

being used to inform the Safeguarding Partnership's updated plan for tackling Exploitation as one of the three key priorities.

The partnerships (led by West Midlands Police) have been successful in a funding bid to the Youth Endowment Fund to replicate a successful model from Northamptonshire, named: the Community Initiative to Reduce Violence (CIRV)²¹; this will be adapted to meet local needs and fit with the existing infrastructure. While this is in the very early stages, it will see an extension of the current 'reachable/teachable' moments and expansion of the current triage arrangements, meaning more children/families are offered support at an early point and reducing the number of children entering the YJS or being exploited.

The expansion of the Horizon Team has been impacted by the challenges of Social Worker recruitment and a model to recruiting adolescent workers, action planning through MACE (Multi-Agency Child Exploitation) meetings, has been implemented.

Section 8 details an up-to-date picture on trends for exploitation and serious youth violence. This evidences a positive reduction in serious incidents/violence, evidencing the impact of measures to tackle established groups like C2/RB7 through Gang Injunctions and Public Space Protection Orders, but a concerning picture around increasing weapon possession, violence within schools, and how children from on-white British backgrounds are more likely to be criminally exploited and enter the youth justice system for more serious offences.



ROC

conversation

Coventry

The CIRV bid involved several community events facilitated by Redeeming Our Communities (ROC) <https://www.youtube.com/watch?v=Cz80cpxSe7c>



¹⁹ This process does not replace a referral into the Multi-agency Safeguarding Hub (MASH) but is addition to this to ensure appropriate steps have been taken.

²⁰ <https://www.warwickshire-pcc.gov.uk/working-together/tackling-organised-crime/>

²¹ <https://www.cirv-nsd.org.uk/>

Progress on the Plan

The learning review by the safeguarding Partnership, detailed in last year's plan, has now taken place and recommendations will be considered within Section 13.

6. Promoting Prevention and Diversion

A Diversion pathway has been established for the Service for children who have been suspects in offences, but where the Police are taking no further action (NFA); this enables an earlier offer to these children, albeit on a voluntary basis and where consent has been given. This is in direct response to the learning from custody reviews around children having multiple NFAs before entering the youth justice system for a serious offence and going straight to custody. Section 8 details how this project will also support in addressing racial disparity in the YJS. The diversion pathway has been developed through redistributing resources, due to the declining number of children in the YJS and particularly those seen through Court.

Arrangements for mentoring have been strengthened, through a bi-monthly partnership meeting that ensures children in the YJS have access to community mentoring offers. This supports in increasing the diversity of the offer to children, enabling matching, and builds on the evidence base that one trusted adult can make the difference.²² Additionally, over the last 12 months we have piloted a youth worker offer of support, delivered through the Family Hubs, to children given first Police only community resolution for a lower-level offence. All the children who have engaged have not reoffended and the intervention is in direct response to local learning reviews.

The local out of court scrutiny panel has been reinstated this year. This sees a sample of children reviewed on a quarterly basis by the Offender Management Police Inspector, Children's Champion, Panel Volunteer and Operational Lead for CYJS. This has strengthened quality assurance of decisions and enables direct feedback by the Operational Lead into the quarterly Management Board; further details are provided in Section 9.

7. Education, Training and Employment (ETE)

The TIRS Framework will see a Speech and Language Therapist (SALT) join the Service on a secondment arrangement; this is in response to the SEND Inspection 2019²³. Section 8 evidences the over-representation of speech, language, and communication/neurodiverse needs within CYJS; a SALT will improve capacity to assess the Service, but most significantly ensuring there is a specialized offer for children in the YJS, recognising that children would enter the YJS with their learning needs unmet.

A review of the local Fair Access Panel²⁴ has been undertaken over the last year that has led to changes to improve integration with Early Help and ensure that a whole family approach is taken.

CYJS has seen AQA accreditation for interventions completed by children seeing nearly 100 units achieved by children; this supports children to be work ready, improve their CV, and celebrate their academic progression. Monthly education meetings continue to take place across the partnership, now led by CYJS, reviewing children in and at risk of entering the YJS to ensure appropriate education, training and employment opportunities are available/supported to engage with.

The Timpson Review (2019)²⁵, and local custody reviews, have highlighted the high proportion of children permanently excluded from school within the secure estate. A sports based mentoring offer is now available for children at risk of permanent exclusion/have been excluded /low school attendance named Chances²⁶. This is a payment by results commissioning arrangement based on an evidence-based model, and locally delivered by Positive Youth Foundation.

CYJS will continue to track the educational attainment of children in the YJS, where good practice examples are identified these will be considered for local learning; Section 8 details the outcomes for education and the desistance analysis continues to identify that ETE as the most significant factor in supporting desistance.

²³ <https://reports.ofsted.gov.uk/provider/44/80456>

²⁴ <https://www.coventry.gov.uk/directory-record/57777/fair-access-protocol>

²⁵ <https://www.gov.uk/government/news/edward-timpson-publishes-landmark-exclusions-review>

²⁶ <https://positiveyouthfoundation.org/2021/03/18/hundreds-of-young-people-in-coventry-to-benefit-from-1-25million-sport-and-activity-life-improvement-scheme/>

²² <https://www.nya.org.uk/resource/hidden-in-plain-sight-gangs-and-exploitation/>

Progress on the Plan

Workforce Development

A live performance dashboard has been created enabling improved and regulated tracking of assessment timelines and adherence to local processes underpinned by the Youth Justice Board National Standards. The Training Planner (see Section 5) has resulted in a sequenced series of training events to respond to identified areas of development, for example:

- Systemic Training and follow-on group supervision – enabling reflection and supporting in hypothesizing for why children have/are engaging in offending behavior.
- Resettlement – building confidence in constitutive resettlement and lens of supporting a child's identity shift.
- Speech, Communication and Language Needs – support in assessing and responding to children's needs.
- Assessment for Adolescent who display harmful sexual behaviour (HSB) 3 – specific training for assessing and responding to HSB
- Structured Assessment of Violence Risk in Youth (SAVRY) – support around risk formulation for pre-sentence reports.

A pathway for development for the Youth Justice Degree Apprenticeship remains outstanding due to the impact of Covid 19 on the Youth Justice Board achieving ministerial approval. In the interim a local pathway is being developed to ensure progression for staff and support a grow your own culture. Other quality assurance processes are outlined in Section 6 and Section 9.

9. Continued National Standard Learning

Section 7 details the steps and actions taken over the last year in response to the 2020 National Standards Self-Assessment.

10. Addressing Disproportionality

CYJS has continued the Service review by 'First Class Foundation'²⁷ consultants reviewing the experiences of children and families open to CYJS, though engagement has been impacted by Covid 19 and concurrent activities. This has led onto team reflective sessions to support cultural competency equipping practitioners with the skills and

confidence to have explicit conversations with children about their ethnicity and identity/disproportionately; within the recent HMIP Thematic Inspection of the experiences of black and mixed heritage boys in the YJS²⁸ this was identified as an issue (see Section 11 for the emerging response to this report). CYJS has continued to support early targeted offers for children at risk with a particularly focus on interventions through sports, like Levelling the Playing Field locally delivered by Positive Youth Foundation and Sky Blues in the Community²⁹. These early support offers aim to reduce the racial disparity in the YJS by engagement in such activities.

Over 2021/22 we have had over 40 families referred and access support from the Kitchen Table Talks Project. The project has created and facilitated community based parental peer support building resilience and social capital for parents with children known to, or at risk of being a perpetrator or victim of serious youth violence; the project is being evaluated by Wolverhampton University and aims to reduce racial disparity.

Recognizing the learning in the Punishing Abuse Report and wider research through the Young Women's Justice Project³⁰ that the experience of girls in the Youth justice System is different to boys, we have committed to ensuring that there is a female specific offer; this works continues and a wider 'girls and gangs' project explores how girls are exploited through county lines and serious youth violence. The Service has co-led on a regional approach to set a mission statement and commitment to ensure robust, early and partnership responses to support pathways and reduce likelihood of coming into the YJS. This has seen consideration to bespoke lived experience offers, like SWAG. This work will continue over the next year and will remain a key focus of this priority, particularly around responding to girls' roles within criminal exploitation that, as outlined in the national research, largely hidden³¹.



²⁸ <https://www.justiceinspectorates.gov.uk/hmiprobation/inspections/>

²⁹ <https://www.levellingtheplyingfield.org/component/content/article/95-levelling-case-studies/140-sky-blues-community-coventry-levelling-playing-field?Itemid=437>

³⁰ <https://www.ayj.org.uk/young-womens-justice-project>

³¹ <https://www.nya.org.uk/resource/hidden-in-plain-sight-gangs-and-exploitation/>

²⁷ <https://firstclassnation.com/>

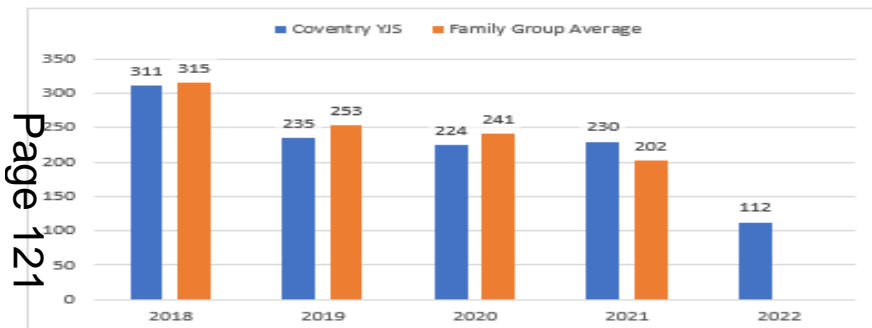
Performance and Priorities

The last year has continued to be challenging in responding to and ensuring quality service delivery with the ongoing impact of the Covid 19 pandemic and concurrent declining number of children entering the YJS. Section 6 outlines the national and updated local performance indicators; an updated picture for 2021-22 against these indicators is presented below except where this information is presented under other areas (for example, feedback from children in Section 4).

Reducing first time entrants (FTE) to the youth justice system

While the FTE rate has remained almost flat between 2019-2021, at around 230 per 100,000, in 2021/22 this has nearly halved to a rate of 112. The latest available YOT family FTE indicator for period Jan 21-Dec 21 indicates a rate of 197, but overall reflective of fewer children in the youth justice system, a regional and national trend.

In Coventry, CYJS continued to offer an Enhanced Community Resolution funded by the Office of the Police and Crime Commissioner (OPCC), which accounted for 42% of interventions over a doubling to the year previous; We started 93 disposal-based interventions in 2021/22. 55 of these (59%) were for out-of-court disposals; this does not include offers of intervention where children are supported where the Police are taking no further action. Overall, there has been a shift from Court disposals making up 60% of interventions in 2020/21 compared to just over 40% in 2021/22.



First-time entrants - Coventry 2018-20222 - rate per 100,000 for children aged 10-17

Child Proven Offences Profile

In 2021/22, CYJS was aware of 118 offences which resulted with a substantive disposal (i.e., one that forms part of a person's criminal record) and 136 non-substantive. The most common categories that resulted in non-substantive outcomes were: Violence Against the Person (46%), Criminal Damage (16%) and Drugs (11%); and, by a substantive outcome were Violence Against the Person (32%), Robbery (14%) and Domestic Burglary (13%).

Comparing to previous years (2017/18-2021/22), all proven offence groups have reduced largely in line with reductions overall with notable exception of motoring offences that has reduced by 90% and knife/weapon offences that have increased from 25 to 32 overall proven offences.

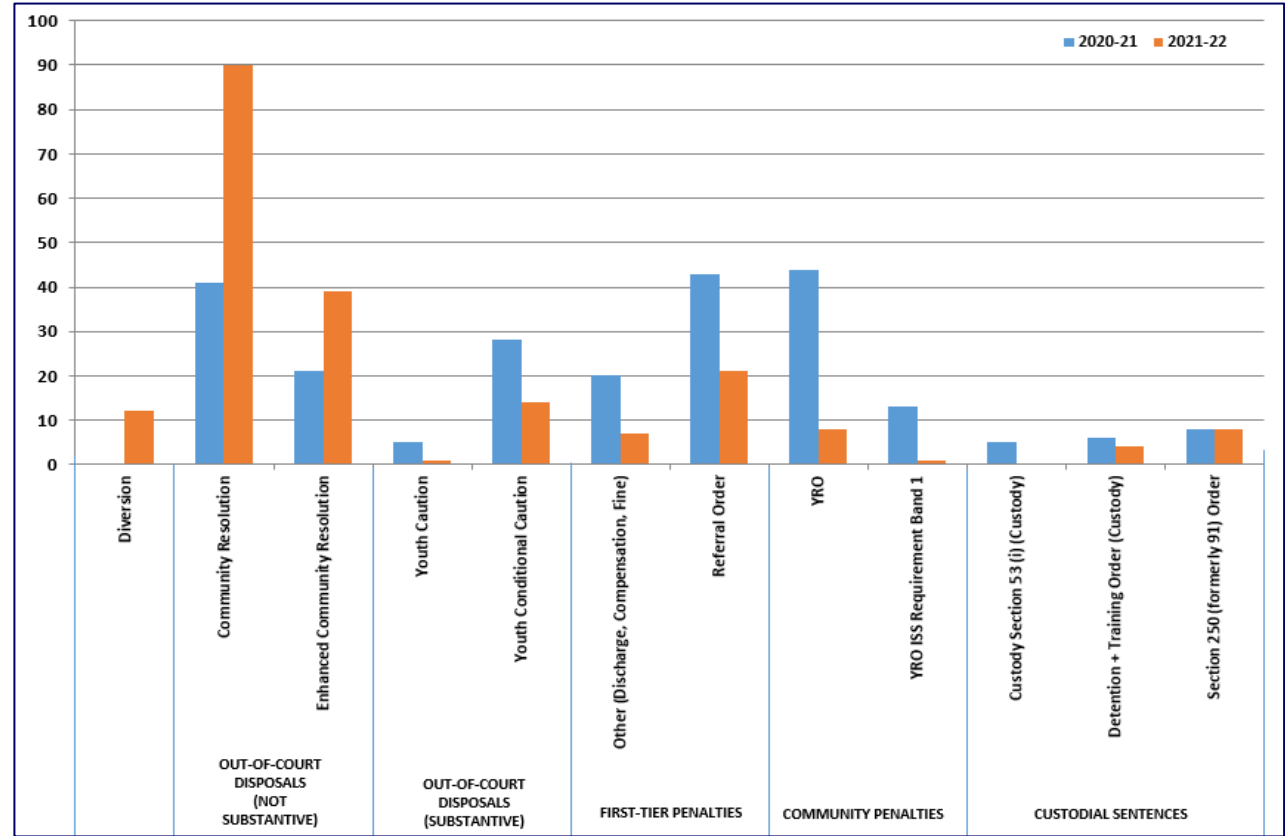
Youth Violence Profile

A Police profile has been provided to enable comparison to proven offences trends, specifically looking at Youth Violence given this is a key priority. Looking at under 24s, the group accounts for 29% (30% last year) of all violence against the person offences. Within this, consistent offences were Assault Occasioning Actual Bodily Harm (56% (increase from 32%), followed by wounding with (11%)/without intent (10%)). Victims were mostly likely to be aged between 20-24 followed by 15-19. Last year has seen fewer more serious injuries than previous years, evidenced by a reduction in the number reported as 'attempted murder'. While violence remains the main offence type for children, peer to peer violence in schools is reported to have increased but this is often not reflected in proven offences due to peer witnesses and victims being very reluctant to make formal complaints. There has been significant evidence of this in relation to the violence between organised crime groups and urban street gangs.

Disposal Profile

Overall, there were 196 disposals this year; by far the most used was the non-substantive Community Resolution (CR), used on 90 occasions. We started 93 disposal-based interventions in 2021/22; 55 of these (59%) were for out-of-court disposals, including 39 (42%) Enhanced Community Resolutions (ECR). There was a significant increase of ECRs and CRs compared to last year reflecting the impact of the Covid 19 pandemic with 2017/18 seeing 205 and 2018/19 seeing 141; additionally, over the last year there has been a specific Policing resource to support OOCs that may also be a factor. ECRs will be considered for more serious offences and any second offences will be referred to YJS for consideration through the local OOC Joint Decision Panel. Section 7 details the offer away from YJS for children given a first Police only CR.

For court disposals, we saw a reduction in all areas reflecting the commitment to divert children (detailed in Section 7), the impact of more peer-to-peer offending (see Youth Violence Profile) and improvements required by West Midlands Police in 'investigating crime' identified in their latest inspection (HMICFRS, 2021)³².



Disposals – Coventry 2020-22

Reducing offending and reoffending by children

The latest national data indicates a reoffending percentage of 36.8% (Jul 19 – Jun 20), the lowest rate in four years, though the family group average is 33.8%. The number of reoffences was less for Coventry at 2.64 on average, versus 3.58 for the Family Group; showing for children or young people who do reoffend they commit fewer offences. We have tracked the reoffending of 48 young people whose original penalty was imposed between October 2020 and March 2021; in all cases, the 12-month monitoring period for reoffending has now expired. Only three of these young people reoffended within 12 months with a total of 8 further offences, giving a reoffending binary rate of just 6.3% and frequency rate of 0.17; there were no clear patterns with the sample of only 3. The use of breach action for children (only counts as reoffending where re-sentenced) reduced significantly with only two children and 1 adult having breach action taken for Court Orders; this has reduced from the 18 in 2020-21. This trend reflects that the service is working with a reduced number of children, the dynamic/creative means of engagement being more successful in engaging children in the last year, and processes to ensure alternative routes to further criminalization are explored in the first instance.

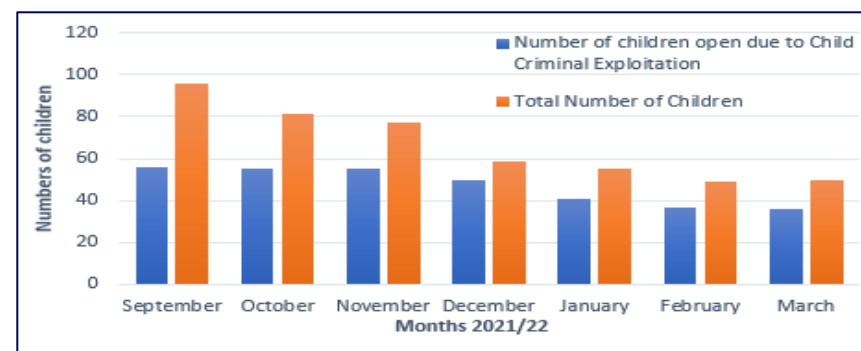
³² <https://www.justiceinspectors.gov.uk/hmicfrs/peel-assessments/peel-assessments-2021-22/west-midlands/>

Demographics

Across 2021/22, the average number of children open for interventions was 52, compared to the 70 at the end of year snapshot for 2020/21. At the end of the 2021/22, 80% were male a decrease on last year of 6% and 59 % were aged 16 or over (compared to 77% in 2021).

66.7% of children/young people had current or previous Children's Service's involvement at least at a Child Protection Level, an increase on the 55.7% % for the 2020/21 snapshot. The breakdown of this was as follows: 16.7% currently of a Looked After Child, 19.4% formerly a Looked After Child, 11.1% had a current Child Protection Plan and 44.4% formerly having a Plan. The number of former or current Looked After Children reduced by from 41% last year to 36% this year; however, there was a significant increase in the number of children previously or currently subject to a Child Protection Plan (an increase of 40%). This change will be somewhat reflected by having a smaller cohort and thus smaller changes resulting in starker percentile differences; however, this evidences why there is a commitment to trauma informed practice, iterates the findings within the Punishing Abuse Report (see Section 12) and is important context for the local criminal exploitation picture explored below.

There is an over-representation of Black, Mixed Heritage and White British children in the YJS cohort, and a large under-representation of Asian young people (see appendices). The ethnic makeup of the group was 48% White British, 8% White Ethnic Minority, 18% Black, 10% Asian, and 15% Mixed Heritage. As of January 2022, Coventry schools had a population makeup of 44% White British, 9% White Ethnic Minority, 13% Black, 22% Asian, 6% Mixed Heritage, 3% Chinese / Other, and 1.0% Refused. Violence Against the Person is the most prevalent category among all ethnic groups with exception for Other White, though this is not statistically significant. Children who reside in deprived areas in Coventry are more likely to be open to CYJS and more likely to be from the CV2 an CV6 areas of the city.



Child Exploitation

There remains a juxtaposition between the decreasing number of children in the youth justice system and continued concerns around serious youth violence; this is not an isolated local trend³³. There is local exploitation team to support children named the Horizon Team. Since April 2020, the team have overseen, and supported children, identified to be at medium/high risk of all forms of exploitation (including criminal); this resulted in a 52% increase in the number of children supported by the team comparing 2018/9 to 2020/21. Looking at the last 6 months, every month the numbers of children connected to criminal exploitation outpace the numbers of children connected to other forms of exploitation. This trend is unsurprisingly reflected in the National Referral Mechanisms submitted for children (Aug 20-Aug 21)³⁴ that saw over 50% of referrals for criminal exploitation and 70% of all referrals being made by the Local Authority.

Demographic trends for the Horizon team largely mirror YJS: 84% Male to 64% female and areas in which children are residing (CV2 and CV6), though the age group is slightly younger (approx. 1 year); this potentially shows a trajectory of younger children being exploited and then a small number entering the youth justice system. Having completed the disproportionality analysis below, this data suggested that where exploitation is a significant concern children enter the YJS for predominantly serious violent offences, evidencing the correlation between exploitation, serious youth violence and racial over-representation. Reviewing missing reports for children across Aug 2020-21, the key exploitation concern related to: child sexual abuse, an age range of 13-18, and 28.4% were children in care; this somewhat differs to the findings above for criminal exploitation; this may reflect the 'hidden in plain sight' nature of criminal exploitation³⁵.

³³ <https://www.justiceinspectorates.gov.uk/hmiprobation/inspections/yar-2021/> and https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1054236/Youth_Justice_Statistics_2020-21.pdf

³⁴ Coventry Child Criminal Exploitation Profile – October 2021

³⁵ Hidden in Plain Sight - National Youth Agency 2020

Disproportionality

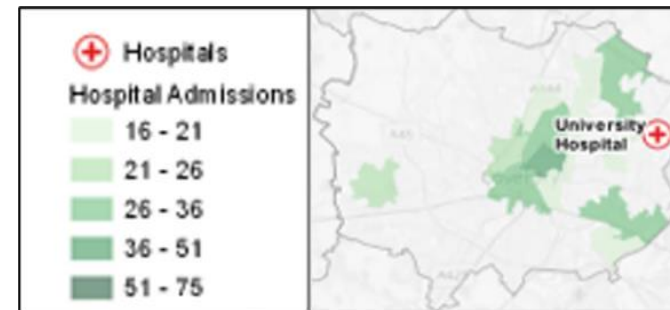
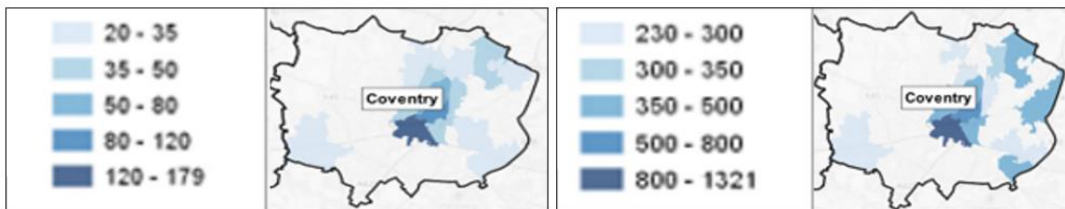
In April 2022 Coventry Youth Justice Service (CYJS) undertook a data comparison exercise to understand whether there was any identifiable disproportionality around ethnicity type and main justice disposal outcome. The data focused on the CYJS caseload from 2021-22, excluding only children who were made subject to a non-substantive (Police only) diversionary outcome during that time; use of breach was very low at 3 children and thus too low for statistical significance.

The exercise compared White British children versus the wider cohort and identified that the non-white British children were twice as likely to be charged to Court but had an offence frequency of 2.37 verses 1.8. To understand this further, we undertook deeper dive into the details of this and circumstances around charging decisions. This identified that charging decisions were appropriate in line with the seriousness of offences and that both groups were offered the same number of ECRS; though, there was a significant difference in Youth Conditional Cautions where 86% of children were White British. It showed that non-white British children were more likely to reside in the CV2 postcode and be identified to be a victim of exploitation/concerns around serious youth violence. The review found children were more likely to have been NFA'd for offences before being charged for more serious offences. Moving forward, and to impact on this racial disparity, the diversion offer will seek to redress this and the current referral breakdown for this is 50/50, reflective of local secondary school population data.

Strategic Needs Assessment - Violence Reduction Partnership

The Strategic Needs Assessment draws upon a varied data set to understand the regional picture on serious youth violence and highlights:

Possession of Weapons (Nov 2018 - Oct 21) Violence with Injury



Young People presenting at A&E for injuries

The assessment (see maps) identified a high concentration of Violence with Injury incidents in Hillfields (within the St Michaels ward) and, though this may reflect some aspects of the nighttime economy, a consistent pattern was seen with Possession of Weapon offences. A slightly different pattern was seen for victims and suspects of under 25 violence (see above), which was more reflective of hotspots in Wood End (CV2) and Foleshill/Hillfields (CV6/CV1). Lastly, reviewing the homes addresses of suspects, perpetrators, and victims of County Lines in Coventry (below):



This identified a similar pattern but that while offences (violence/weapon possession) predominantly take place in the Hillfields, the majority of victims and perpetrators reside elsewhere in the city. This evidence base has led to Hillfields and Wood End receiving additional funding through the Police and Crime Board, alongside specific resourced support via the Violence Prevention Partnership in detached youth work³⁶.

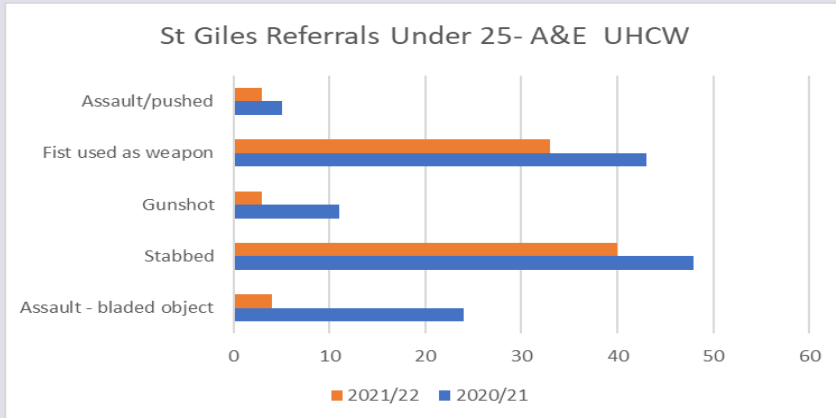
Across the West Midlands the most common age to be involved in County Lines (Jan 19- Oct 21) was aged 16-17 years old, across all persons 40% were Black, a significant overrepresentation, and over 90% were male. For Coventry, Warwickshire remains the main area where County Lines are seen.

The demographic picture for hospital admissions is a comparative picture to the exploitation and YJS profile regarding home addresses. Admissions for 'fist used' as a weapon' saw a spike in Sept/Oct believed to be as a result of assaults taking place with schools and injuries requiring X-rays through A&E.

³⁶ <https://westmidlands-vrp.org/supporting-places/coventry/>

Performance and Priorities – 2021/22

This trend likely reflects the trend of the permeation of gang/postcode issues that has arisen in Coventry over the last 5-6 years and as discussed by children in Section 4. The largest number of referrals for assault are within the White ethnic group and 13% of the referrals are in the Black ethnic group. Overall, there has been annual decline compared to 2021 for all areas, but most notably for gunshot injuries (see below).



Reducing the use of custody and remand

There has been a significant reduction in remand use compared to 2020/21 (see appendix) and the lowest recorded use overall. All children remanded were aged 17, male with the following ethnicities: White British (concurrent), Black African (concurrent) and Black Caribbean. Only one of the remands was new for 2021/22 and an intensive bail package was offered but not given by the Courts; while a community sentence was given a refresher on the robustness of intensive bail support packages was completed at the Youth Panel Meeting in November 2021.

Custodial episodes for children have reduced but remain higher than the Family Group Average; a rate of 0.29 per 1000 children compared with 0.21 for the Family Group. However, 2021/22 only saw two children as new entrants into custody and no new children going to custody since May 2021; 3 children had concurrent sentences for offences in custody/offences before their index sentence.

Custody Analysis

CYJS undertakes a learning review for all children who have gone to custody. Reviewing instances of 2021/22, for all children there had been

extensive attempts to support desistance, which had not been successful. Peers and identity through gang labelling was a significant factor for all children. All had a significant Children’s Services histories, wider family members, siblings or parents who had been in custody and this reflected an intergenerational transmission of offending behaviour. All children were known to the Police Offender Management Team or Police Organised Crime Group team: all children were offered third sector support through mentoring offers. For all children there were concerns or they were known to have been witness to serious youth violence in the community, 3 had Conclusive Grounds decisions through the National Referral Mechanism, all were, at points, open to the Horizon Team, and all had been/or were accessing alternative schooling provision (non-mainstream).

For the majority, there known lived experiences were similar to those outlined in the Punishing Abuse Report but compared to 2020/21 a greater reflection of experiences of trauma being related to serious youth violence and exploitation. Two children were White British, Two Black African and 1 child was Mixed ethnicity; see appendices.

Restorative Justice

CYJS achieved a secondary contact rate of 100% compared to 93% in 2020/21. The numbers of victims reduced in line with the reduced number of offences, though the use of shuttle mediation and face to face increased from 2020/21; likely reflective of the recovery from the Covid 19 pandemic. Of the children who engaged in face-to-face mediation in 2020/21, none have reoffended across 2021/22. Feedback from victims of crime remained very strong with an average rating score of 4.9 out of 5 mirroring the last three years.

Health Profile

There were 71 referrals this year, this is a decrease of 7 referrals since the last year but a significant percental increase. There were 63 males and 16 females and 2 non-binary children, reflecting a shift to a greater proportion of females. Reviewing referrals by ethnicity, these were in line with the overall YJS cohort.

24% of children referred were classified as Looked After Children compared to 25% in 2020/21. Last year, 9% of referrals were for children that were within a custodial provision that has reduced significantly in line with only 2

new children going to custody and both being around 18 at the time of sentence. The vast majority of referrals were for children subject to an Out of Court Disposal and all of the children accessing the diversion pathway were referred.

Approximately half of the referrals were for information and the other half for assessment/ consultation and or intervention. More broadly, the 'Long Term Plan Children and Young People complex needs service: Midlands Overview (2020)' document identifies that Coventry has a high assessed number of children with mental health disorders aged 5-16 and a high number of adverse childhood experience related indicators compared to the national average; this has been compounded through the Covid 19 period where an increased number of children have presented in crisis and been admitted into inpatient CAMHS provision³⁷.

Referrals into Positive Choices (substance misuse support for children) halved from the last year, but this is in line with reduction in numbers across CYJS and a higher proportion being referred for health support/accessing mentoring. Cannabis use remains the main referral reason; quarterly updates from Positive Choices and Health are provided and tracked through Management Board.

Educational needs

Reviewing children open to the Service across 2021/22, 16% open to CYJS had an Education, Health and Care Plan (EHCP) and 51% having some form of identified special education needs as identified through their assessment. These figures are consistent with 2020/21, but much higher than the general schooling population, which, as of January 2021, had 17.6% of pupils with Special Educational Needs and/or EHCP compared to CYJS's 67%.

Education attainment

An analysis of children open to CYJS in Key Stage 4, across 2016-2019, was completed last year that has not been repeated due to the impact of Covid 19 pandemic. The review identified that children were 2 grades below where they were expected to achieve similar to the specialist and alternative schooling provision across the city³⁸; these findings are in line with national

research³⁹. The analysis identified a downward trend overall, but this reflects

a move to a smaller group of children in the youth justice system with a very high level of need.

Education, Training and Employment (ETE) Engagement

In 2021/22, among CYJS children/adults aged over sixteen, 19% were NEET at the time they completed their intervention a 1% improvement compared to 2020/21. However, positively, across all children 84.8% were in suitable ETE at the end of their intervention, though this is a decrease of 2%; these children are reviewed through each quarter's Management Board to ensure appropriate support has been implemented to achieve ETE engagement.

Alternative provision data

Reviewing local permanent exclusion data and Violence Reduction Partnership regional data, a decline was shown in permanent exclusions for Coventry over the last 3 academic years with Coventry keeping part-time timetables in place for less than 1/6 of the maximum days allowed; this indicates a resistance to take children away from the safety of educational settings. Coventry has the lowest exclusion rate across the Violence Reduction Partnership West Midlands area, below the England average. Reviewing children open in 2021/22, 24.1% were in alternative education at some point while open to CYJS representing a significant overrepresentation and approximately half of all children of school age; 1 child was identified to be electively home schooled. Of this group, in order of size: 58% were White British reflecting an overrepresentation, White Other 12% (total 70%), Black 9% and other groups below 5%.

Desistance Analysis

Last year, to better understand the factors which will support children to not reoffend and inform the priorities set, CYJS undertook a review of the assessed risk factors for and against a child's offending behaviour for all children from the last year (2020/21); this exercise was undertaken again for 2021/22 and reviewed against the 2020/21 findings.

³⁷ https://www.coventry.gov.uk/homepage/1250/extended_learning_centre_-_key_information

³⁸

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/814368/understanding-educational-background-young-offenders-amended-summary.pdf

³⁷ This has seen a review of targeted support for Emotional Well-being and Mental Health Support.

³⁸ <https://www.compare-school-performance.service.gov.uk/schools-by-type?step=phase®ion=331&geographic=la&phase=secondary> ;

Performance and Priorities – 2021/22

Reviewing the assessed factors for preventing/reducing a child's offending behaviour, the most significant factors across both years were consistently: (1) Learning, Education, Training and Employment (2) Family and wider networks (3) Engagement and Participation.

Reviewing the assessed factors for a child's offending, the three most significant factors in 2020/21 were: (1) Features of lifestyle (2) Families and wider networks (3) Thinking and behaviour; and in 2021/22: (1) Families and wider networks (2) Substance Misuse (3) Emotional Development and Mental Health. This reflects a shift from the previous year and likely to reflect the work on trauma informed practice and evidence the shift from viewing decisions as being cognitively led versus emotionally led. There was a significant shift in seeing 'substance use' as a key factor, though this has not been reflected in an increase in referrals rates for work around substance use and this will be explored as part of the development and improvement plan.

Risk Assessments

The overwhelming evidence in this Section demonstrates significant concerns around serious youth violence, exploitation and children with a high level of need locally, regionally, and nationally. This trend has been reflected in the assessed risk levels of all children; since use of AssetPlus Assessment Framework in 2016/17, 15 children were assessed as presenting a high risk of serious harm or/and high concerns regarding their safety and wellbeing concerns (any adverse outcomes). Across the last few years this has increased as follows:

•36 - 2017/18 • 44 – 2018/19 • 58 - 2019/20 • 59 – 2020/21 • 51 –2021/22•

The last year saw a decrease but a higher percentage given the reduction in numbers; it is anticipated that the overall number in 2021/22 will be similar to 2019-2021 with the increase in numbers through the Diversion Project.

In next year's plan, an in-depth review of all risk assessments between April 2019 and March 2021 was undertaken; this has been repeated for the 2021/22 period. Similar trends were identified, regarding the key high-risk concerns being related to the perpetration of community violence with the 'Peers/Rival Gang Members' accounting 29% for potential victims. When

looking at the most concerning possible 'adverse outcomes', this related physical/harm and death followed by 'emotional harm' and 'criminal exploitation'; this highlights that the city has seen escalating issues of serious youth violence since 2016 to 2020, particularly between two prominent urban street gangs.

Priority Review

Section 7 has demonstrated that CYJS is working with a smaller, and sadly more violent, vulnerable, and traumatised group of children whose needs are very high. Children in the YJS are most likely to be accessing (have accessed) alternative schooling provision following permanent exclusion, at risk of being or are a victim of criminal exploitation, residing in a deprived/high risk area and more likely to be from a Black or Ethnic Minority Background. To appropriately tackle these issues, we need: children leading steps for change, a skilled workforce, and a city approach to delivering trauma informed prevention and diversion activity. This evidence base demonstrates that the 10 priorities continue to be appropriate, namely:

- (1) Child Engagement and Desistance
- (2) Restorative Justice
- (3) Joint Strategic City Planning
- (4) Trauma Informed Practice
- (5) Tackling Exploitation and Serious Youth Violence
- (6) Promoting Prevention and Diversion
- (7) Education, Training and Employment
- (8) Workforce Development
- (9) Continued National Standard Learning
- (10) Addressing Disproportionality



National Standards

In April 2020, all Youth Justice Services were required to submit a self-assessment against the YJB's new National Standards, which '...define the minimum expectation for all agencies that provide statutory services to ensure good outcomes for children in the YJS'. The self-assessment was submitted in April 2020 and involved Management Board Member sponsors per each of the standards. In January 2021, following a national moderation exercise, Coventry had confirmation that the submission offered an evidenced reflection of the judgments in the service standards and that a validation visit was not required due to the quality of the return. The self-assessment highlighted that, while the Service continued to see outcomes for children largely met, there were significant areas for progression and improvement, namely: National Standards 4 (In Secure) and 5 (Transitions) alongside Board Development. An Improvement Strategy 2020-23 was developed and then superseded by the 2021-23 Youth Justice Plan that built on from the activity identified within the self-assessment.

Since the submission of the self-assessment, CYJS has created and updated all guidance for all pathways. This has been done through the lens of the journey of the child in the youth justice system and ensuring a clear benchmarking of expectations at specific junctures as identified through best/evidenced practice models; for example, concepts like 'constructive resettlement' where the focus is supporting a child's identity shift, in addition to practical resettlement factors (e.g. housing). The impact of this meant a team wide uplift and greater parity in services offered depending on the individual practitioners; this has been imperative as CYJS has continued to see the most experienced practitioners retire and new practitioners not necessarily entering the Service with previous youth justice experience. To ensure that these standards/mechanisms for improvements embed, and lead to sustained Service improvement, a programme of monthly auditing has been completed across the last year.



Through these audits, a review of key developments for each standards are outlined below:

Standard 1: O OCD

A review of O OCDs was undertaken in Quarter 1 2021/22, that led to a rota for Children's Services attendance at the Joint Decision Panel, an amendment of the decisions process in the Panel to explicitly include the options for an 'extended assessment period' and 'escalation' to ensure these options are considered by the partnership, and reintroduction of the quarterly scrutiny panel (detailed in Section 7).

Standard 2: at Court

An audit was completed in Quarter 3 looking at decisions regarding when and when enforcement action had not been taken. This led to a mentoring process being implemented across the team to strengthen expectations around third sector engagement in a child's plan and a simple guide⁴⁰ for YJS Support Officers being devised to ensure consistent recording processes; workshops were undertaken to introduce this. Following this review, a review of Post Court Reports was completed that identified some inconsistencies in completion quality; a team simple guide was produced to ensure quality was consistently high and to particularly support less experienced practitioners in the Service.

⁴⁰ Simple guides – these are key headlines for a procedure, guidance, or policy

National Standards

Standard 3: in the community (court disposals)

A review of assessment quality was undertaken at the start of the year that identified a good use of hypothesis models, but a need for greater clarity on current controls and contingency planning to evidence these are clear and robust. A peer review model was undertaken across each team led by the Senior Practitioners and they have led on quality assurance for children on the Diversion Project to continue in supporting whole team/system development.

In Quarter 4, an audit was undertaken into Referral/Youth Rehabilitation Orders. The case planning process was strongly embedded, however uses of engagement processes were variable leading to a refresher on what constitutes 'acceptable reasons' and the intertwining of working in a trauma informed way. This has supported with equipping practitioners with the skills to navigate the competing balance of care versus control.

Standard 4: in secure settings

Constructive Resettlement: the last year has seen the introduction of resettlement key worker and ensure, where appropriate, there is an increased intervention offer to children as part of their resettlement journey; this is to ensure that there is a robust offer given the generally higher reoffending rates for this cohort. At the start of 2021, a resettlement audit was undertaken to assess the impact of this change and the updated guidance from 2020. The audit identified that responses remained somewhat orientated to resettlement pathways and two refresher workshops were undertaken on constructive resettlement as a result, alongside reviewing several case study examples.

Standard 5: on transition and resettlement

Young adults transferred to Probation continue to have their progression tracked through CYJS Management Board and reoffending rates are tracked through the aforementioned live reoffending tracker. Updates are provided to Management Board for those transferred across the last quarter, which largely showed positive engagement and no breach action on reoffending; however, there have been challenges in the transfer process as a result of Covid 19, with particular challenges for children/adults in custody. In Quarter 1, a Joint Probation Audit was

undertaken that highlighted the challenges the Service had in supporting transfers to Offender Management in Custody (OMIC) in lieu of a national process. This gap was escalated to Youth Custody Service, Youth Justice Board and the CYJS Management Board; this remains the case and a local agreement (child by child) has been agreed to transfer to Coventry Probation who will provide oversight if/where there are issues for transfers to OMIC. The audit also led to strengthened processes for oversight by the Seconded Probation Officer, leading to an improved system footprint of their activity/transfer process.

In Quarter 3, a management supervision audit was completed that led to piloting of an amended supervision template to ensure it was strengths focussed and appropriately capturing the child's voice. A re-review was undertaken in Quarter 4 and this showed improved capturing and, following team consultation, the new supervision template was implemented across CYJS.

In Quarter 4 a Joint Children's Services Audit was undertaken to review multi-agency working and if review the effectiveness of arrangements that should achieve a shared understanding of risk and planning for children. The audit resulted in strengthening the CAMHS screening for all children through the new pathway (see Section 8), a re-review of the children's plan, and a workshop around adapting this to meet children's needs (e.g. age). Learning from all audits have been communicated through monthly developmental practice workshops, monthly team meetings and quarterley half-team days.

Next steps

The audits (particularly the latter) led to Management Board in February 2022 agreeing for an external review now being undertaken by Lee Westlake Ltd⁴¹; the initial approach was replicating a peer review in process but with a focus on the initial assessment process and more lately leading to reviewing the arrangements for contingency planning. Learning from this will be used to inform the focus of a further self-assessment across 2022/23 that will also consider the updates in the yet to be published new case management guidance.

⁴¹ Lee Westlake is a previous Head of Service and Chair of the Youth Justice Sector Improvement Partnership; Lee continues to deliver the lead peer review training across the Sector.

Challenges, risks, and issues

Legislation and guidance – YJSs/partnership will need to respond to the changes within the Police, Crime Sentencing and Courts Act (2022), including the Serious Violence Duty. As outlined in Section 5, the storming phase to ensure governance and processes are in place is underway.

National Key Performance Indicator Review - The Management Board have reviewed the current local indicators, though there is a national review the existing national indicators that CYJS will have to respond to.

Funding - The YJB grant remains unannounced at the time of writing the plan and while assurances have been given on the maintenance of last year's core grant, this impacts on longevity planning. The impact of unconfirmed annual funding is also reflected across the current funding profile for agendas to tackle serious youth violence and exploitation.

Workforce and offers – Staff changes and new staff induction over the past two years resulted in significant time investment from other staff, including managers. This will continue over the next 12 months as roles are recruited to with retention particularly significant given the Service has moved to a new Diversion Offer.

The Diversion route gives a huge opportunity to reinvest resources earlier and prevent entry into the YJS; with this said, the offer presents a need for a cultural shift within West Midlands Police that is currently underway. The pathway also sees an opportunity to redress a significant current challenge in the racial disparity seen in Court (see Section 8).

Out of Court Disposals - The last year has seen a shift into a higher proportion in the use of out-of-court-disposals that is welcomed, but there is an ongoing challenge in ensuring appropriate decision making with changes to how Home Office Counting Rules are interpreted⁴² and that the Association of

⁴² <https://www.gov.uk/government/publications/counting-rules-for-recorded-crime>

Chief Police Officers Youth Gravity Matrix 2013⁴³ requires urgent updating; a national review is currently underway. HMIP, last year, described this as a '...as a 'postcode lottery' in the use of out-of-court disposals, with wide variation in the policies and processes that govern local schemes (p.33).⁴⁴; Coventry and Birmingham YJSs are currently working alongside West Midlands Police and the PCC to develop an updated Out of Court Disposal Policy for the region.

Offence Pattern Trends - Section 8 outlines that while most proven offence types have reduced significantly, violence against the person remains the most common offence group type and the city saw an increase in weapon possession amount children last year. The last year has also seen an increase in violence within schools and, while a reduction in the most serious offences, a worrying trend of the possible permeation of gang/postcode issues/increased tensions into mainstream secondary schools.

There is a significant amount of work to tackle violence within schools, as part of Education Violence Prevention Plan; for example, activity through the City's Police and Schools Panels and direct intervention into schools like Round Midnight⁴⁵ that uses virtual reality story scenarios as an engagement tool; CYJS is supporting in the delivery of this.



Press. Cast, Virtual_Decisions:KNIVES

Children Permanently Excluded - There is still a significant over representation of children permanently excluded in CYJS and most significantly in the very small number of children receiving custodial

⁴³ <https://yjlc.uk/sites/default/files/ACPO%20Youth%20Gravity%20Matrix.pdf>

⁴⁴ <https://www.justiceinspectors.gov.uk/hmiprobation/inspections/yar2020/>

⁴⁵ <https://www.roundmidnight.org.uk/>

Challenge, risks, and opportunities

sentences: this remains a key focus and, through the team desistance analysis (see Section 8), there clear recognition that education, training, and employment is the strongest factor in supporting desistance.

Services - NSPCC (National Society for the Prevention of Cruelty to Children) have had funding withdrawn locally that has impacted on the local offers for children convicted of sexual offence. CYJS has undergone assessment and intervention training so this can be undertaken in house; this is an additional ask and demand will be reviewed over the next 12months.

There remains an ongoing challenge around Youth Justice Services maintaining independence⁴⁶, and a balance of a 'child first' approach/risk management. This was specifically highlighted in the HMIP 2021 Annual Report: *'We are mindful that services have focussed upon ensuring a 'child first' approach is implemented, but do not consider this has to be mutually incompatible with continuing to ensure that risks children present to others are still effectively assessed and understood. Particularly given the rise in violent offending and the complexity of the children working with YOS. For this reason, we urge YOS to ensure they focus upon adequately assessing risk and putting in place effective planning and implementation to manage, mitigate and reduce risks wherever possible.'*⁴⁷

Inspection - HMIP have moved from a 4-year inspection cycle to a 6-year cycle as a result of the Covid 19 pandemic. CYJS's last inspection was a short quality screening in 2016 and a new framework (2018) and a new amended framework (2021) has been introduced since then. This has led to the work with Lee Westlake Ltd, outlined in Section 9, to support in external reviewing of CYJS to ensure that local auditing is in line with revised inspections.

Opportunities

- The TIRS and CIRV funding across the next three years gives huge opportunity to support system change at a preventative, diversion, and tertiary basis; these models are both being external quality assured and support the wider national research base.
- COCEX – additional investment into exploitation mapping, intel

triangulation and support around disruption measures gives great opportunity to prevent the small number of children entering the YJS.

- CYJS and Children's Services are currently using these funding routes as an opportunity to review current adolescent services across the Services and making sure that these are fit for the current need of the city with a specific focus on pathways away from care or custody.
- The Covid 19 pandemic has seen more hybrid ways of working that give opportunity to work more effectively and these aspects will continue to be maintained; for example, some multi agency risk panels to continue to take place on a virtual basis due to increased partnership attendance and engagement.

Next steps

The improvement and business plan will outline, against the priorities, how we intend to respond to these challenges, deliver on the CYJS vision and measures of success as per the national and local performance indicators. In doing so, meeting and delivering on the YJB's 'Child First' vision, the guiding principles, and strategic pillars.

The plan consolidates learning through the Covid 19 recovery, learning from relevant inspections, thematic reviews learning exercise, research, and other sources (for example, HMIP Academic Insights)⁴⁸. The plan is a working plan that will continue to develop across the coming year. The plan has been created to complement, and sit alongside, existing plans (for example, Coventry Youth Violence Prevention Partnership Strategy Plan), referring to specific elements, but without duplicating actions or reporting processes. The Plan focuses on specific actions across the coming year in recognition that much of this work will lead to follow on activity against the vision and priorities, which will be outlined in an updated 2022/23.



⁴⁶ <https://childrensocialcare.independent-review.uk/> - an independent review of children's social care

⁴⁷ <https://www.justiceinspectorates.gov.uk/hmiprobation/inspections/year-2021/>

⁴⁸ <https://www.justiceinspectorates.gov.uk/hmiprobation/research/academic-insights/>

Service Improvement Plan

Development of the Service Improvement and Business Plan

Section 13, outlines actions against each priority and these are triangulated across the YJB national standards and the YJB 2021-24 Strategic Plan. The Plan outlines what each action does to meet local/national indicators and the expected outcome of the action. Board Member sponsors are identified for each priority who will offer support and challenge around the priority. The Plan also details Plans, Papers, and Source Documents that identify what the action is in response to, for example: local learning, HMIP inspections (local, thematic, and annual), feedback from children/families /team and relevant research.

HMIP Thematic/New Standards

Following July 2021 new standards and a strategic Out of Court Strategy and Resettlement Strategy have been completed in advance of these standards with the recommendations considered as part of last year's Plan; with updates on these are provided in Section 7.

The recent HMIP Thematic Inspection of the experiences of black and mixed heritage boys in the YJS led to the formulation of a task and finish group with representation from: CYJS, the City Council, Early Help, Education, YJB, West Midlands Police and the third sector. Given the systemic nature of this issue, the majority of actions are absorbed into the Plan though some steps have already been achieved, for example but not limited to:

- An ethnicity breakdown of children released under investigation and stop & search data will be reviewed as part of the performance scorecard for the Safeguarding Partnership within the exploitation priority; this will enable scrutiny and support to address disproportionality issues.
- A Police User Voice group has been created to discuss such issues, supported by the PCC Youth Commissioner; this will see a pathway for children/young people to offer scrutiny directly to the Police.
- Extension of the PCC Funding to include children at medium/high risk of exploitation given there is a pattern for black and minority ethnic children being criminally exploited and entering the YJS.

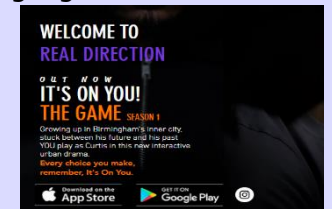
Local Learning

The partnership has undertaken one Community Safeguarding and Public Protection Learning Review in the last year, though while the child was charged in 2021 the offence was from 2019. The process involves all agency partners completing an internal review and then a round table learning event; this is chaired by the Independent Chair for the Safeguarding Partnership. The review illuminated common themes from those completed in 2020/21, namely: significant familial and peer entrenchment through organized crime groups. This led to specific training around masculinity and the development of an intervention programme focusses on de-glamourizing gang culture named Info Real: <https://www.inforeal.co.uk/>.

The learning from custody reviews from the last year are outlined in Section 7.

Board and Workforce Development

In late 2021, Coventry City Council commissioned an independent review of the YJS Board governance arrangements to ensure that the Board was in a state of readiness for a future inspection (HMIP/JTAI) and to identify areas for improvement to work towards promoting good governance and optimal productivity of the board. This was undertaken in by Mutual Ventures (an external consultancy company) and involved two stages: Individual 20 min conversations with each member to gather their thoughts on the board, their role, and input into the agenda for the reflection session; facilitating a session for the board to reflect on their role and define next steps. This resulted in a task and finish group (Probation, Community Safety and Violence Reduction Partnership) being tasked with reviewing the vision, objectives, chairing arrangements and overall functioning in line with the YJB's 'Youth justice service governance and leadership' published in December 2021. These recommendations have since been considered by Management Board through a further development session completed in April 2022 facilitated by Phil Sutton, a Youth Justice specialist and lead within the Association of YOT Managers (AYM); the recommendations are reflected in the Plan in Section 14, including exploring arrangements for an Independent Chair. Workforce Development remains a priority as outlined in Sections 5 & 7.



Evidence-based practice and innovation

Current examples

The Punishing Abuse Report presents the findings of a targeted review of 80 children across 11 authorities in the West Midlands (including Coventry) and West Mercia. The report starkly highlights how children in the youth justice system have experienced early childhood abuse, loss, and structural inequalities. The report's recommendations were an integral part of last year's plan and, following a re-review of the recommendations, will continue to be in this/coming years Plan.

Kitchen Table Talks outlined in Section 7, this project has been a YJB Pathfinder and follows a proven success model from Sandwell YJS. Coventry has referred over 40 families into the project and while awaiting the final report, the interim report in Oct 2021 outlined: an increase in parental wellbeing and improved relationships with the YJS⁴⁹

While there is currently a lack of national guidance and evaluation on which models of preventative based interventions are continually effective and thus viable for upscaling, the 'child first, offender second' evidence base highlights that criminogenic impact of the Youth Justice System and advocates for '...a childhood removed from the justice system, using pre-emptive prevention, diversion and minimal intervention. All work minimizes criminogenic stigma from contact with the system (Case and Browning, 2021).⁵⁰ Therefore, Coventry has built on the established point of arrest intervention offer through St Giles (see Section 7) to ensure an eclectic mix (various locations across the city, building on different interests, and differing diversity of delivery) of community mentoring offers is considered at this point; this also

builds on the learning from the 2017 Lammy Review (2017). For children who need a more intense offer to prevent escalation, (as outlined by Deković et al. (2011)⁵¹ and the HMIP Annual Report 2021) children are offered support through the Service's Diversion Offer and the additional partnership services within the YJS. The projects/offers will be quality assured by Coventry University to support in building a local evidence base of best practice.

Emerging Practice/Innovation:

Coventry has been successful in bidding for the Trauma Informed Recovery Support (TIRS) Framework and the Community Initiative in Reducing Violence (CIRV) – see Section 7. Both initiatives are predicated on the emerging evidence base around 'reachable/teachable' moments, outlined starkly in the 'Closing the gaps: Preventing children and adolescents falling into violence (2021)⁵². The Youth Worker offer (detailed in Section 7) running over the last 12 months has seen all children who have successfully engaged have not been arrested over the same period; this is an emerging evidence base but evidences the promising results thus far. The Violence Reduction Partnership, West Midlands Police, Horizon, and CYJS have been trialing (outlined in Section 10) a virtual reality resource named Round Midnight; initial feedback from children and the conversations the tool is facilitating through school, family hub and other group sessions, shows great emerging evidence of successful outcomes as a tool to engage children.



⁴⁹ <https://yresourceshub.uk/evaluation-library/item/925-serious-youth-violence-interim-evaluation-report-west-midlands-pathfinder-april-2021.html>

⁵⁰ Child First Justice: the research evidence base – full report - https://yresourceshub.uk/evaluation-library/item/download/1116_220257bdb0ede10d9032a660364ac828.html

⁵¹ <https://journals.sagepub.com/doi/pdf/10.1177/0306624X17751161#:~:text=A%20meta%20analytic%20study%20by,skills%20showed%20the%20largest%20effects>. And A thematic inspection of the experiences of black and mixed heritage boys in the youth justice system, 2021

⁵² <https://institute.global/sites/default/files/articles/Closing-the-Gaps-Preventing-Vulnerable-Children-and-Adolescents-Falling-Into-Violence.pdf>

Looking forward

Improvement and Business Plan

	Action	Lead	By When	Outcomes	Indicator	Relates Plans/Papers/Source Documents
<u>Children, young people, and victims, first and at the center of what we do</u>						YJB Child First Principles: Principle 1 & 2 YJB Strategic Pillars: Pillar 3, Priority 1 & 2 National Standards 1 - 5
Child Engagement and Desistance – Caroline Ryder (Board Member Sponsor), Tianne Peynado (Practice Lead)						
Key Indicator – Improve feedback from children/family/parents and victims of crime						
1.	Through Our Eyes continue to meet quarterly and consider dynamic methods of Management Board feedback.	Tianne Peynado (Engagement and Development Officer) with Guiding Young Minds and Youth Crime Commissioner	End of Q2	Direct pathway for Children's voices and views to be actioned by Management Board	Increased and improved child/family/parent feedback	CYJS Children's and Parent's/Carer's Voices Analysis and Strategy 2022 Participation in Practice and Co-creation Project - Peer Power Project 2021
2.	Development of a child/family friendly headline plan	Tianne Peynado (Engagement and Development Officer)	End of Q2	Children/Families know our vision and priorities	Increased and improved child/family/parent feedback	CYJS Children's and Parent's/Carer's Voices Analysis and Strategy 2022 Participation in Practice and Co-creation Project - Peer Power Project 2021
3.	Publishing the Child's Journey Animated Video	Tianne Peynado (Engagement and Development Officer)	End of Q2	Children/Families know our vision and priorities	Increased and improved child/family/parent feedback	Participation in Practice and Co-creation Project - Peer Power Project 2021
4.	6 Monthly Viewpoint/Self-Assessment Analysis and exploration for direct feedback pathways, alongside direct questions around children's experiences of racial/other forms of discrimination	Tianne Peynado (Engagement and Development Officer)	End of Q2	Improved engagement with children	Increased and improved child/family/parent feedback	CYJS Children's and Parent's/Carer's Voices Analysis and Strategy 2022 HMIP Thematic – Experiences of Black and Mixed Heritage Children in the YJS (2021)
5.	Case closure reviews to continue to be presented to quarterly Management Board	Tianne Peynado (Engagement and Development Officer)	End of Q4	Strengthen approach to learning following feedback	Increased and improved child/family/parent feedback	Domain 1 Self-Assessment
6.	Development of a peer/voluntary role model programme	Tianne Peynado (Engagement and Development Officer)	End of Q4	Improved whole family offer	Increased and improved child/family/parent feedback	West Midlands Violence Reduction Unit Evaluation - Serious Youth Violence Pathfinder: Evaluation report – April 2021

Improvement and Business Plan

	Action	Lead	By When	Outcomes	Indicator	Relates Plans/Papers/Source Documents
7.	Through Our Eyes Review of personalized CYJS space for children and families.	Tianne Peynado (Engagement and Development Officer)	End of Q2	An improved child friendly personalized space.	Increased and improved child/family/parent feedback	HMIP Domain 1 Self-Assessment Youth Justice Plan 2021
8.	Engagement with children accessing Family Hubs and School Link Officers	Tianne Peynado (Engagement and Development Officer)	End of Q2	Support community integrating and build emerging themes for children	Increased and improved child/family/parent feedback	CYJS Children's and Parent's/Carer's Voices Analysis and Strategy 2022
9.	Create a leaflet for the Police Station explaining the OOCD's and the process of working with CYJS once referred by Police from assessment to intervention.	Stacey Brown (YJS Senior Practitioner), Tianne Peynado (Youth Justice Development and Engagement Officer)	End of Q1	Manage children and parent/carer expectations once referred into CYJS.	Increased and improved child/family/parent feedback	CYJS Children's and Parent's/Carer's Voices Analysis and Strategy 2022
10.	Evaluate and review the ISS induction in order to identify gaps and determine actions to improve the process.	Brittany Hawke (Senior Practitioner), Stacey Brown (YJS Senior Practitioner), Tianne Peynado (Youth Justice Development and Engagement Officer)	End of Q3	A child undertaking an ISS intervention fully understands the process and the expectations.	Increased and improved child/family/parent feedback	CYJS Children's and Parent's/Carer's Voices Analysis and Strategy 2022
11.	Empower staff to challenge and advocate for children regarding the number of professionals involved in a child's life. Group discussion to take place in pod meetings.	Stacey Brown (YJS Senior Practitioner)	End of Q2	Raised awareness amongst the team regarding the impact of multiple professionals in a child's life and where possible minimise the multiple professional contacts.	Increased and improved child/family/parent feedback	CYJS Children's and Parent's/Carer's Voices Analysis and Strategy 2022

Improvement and Business Plan

	Action	Lead	By When	Outcomes	Indicator	Relates Plans/Papers/Source Documents
12.	Explore and build new links of training and employment opportunities for children.	Tianne Peynado (Youth Justice Development and Engagement Officer)	End of Q4	Establish and offer more training and employment for children.	Increased and improved child/family/parent feedback	CYJS Children's and Parent's/Carer's Voices Analysis and Strategy 2022
13.	Review of where referrals to Positive Choices have not been made but there are concerns that a child is abusing substances.	Tianne Peynado (Youth Justice Development and Engagement Officer)	End of Q4	Increased volume of feedback of children.	Increased and improved child/family/parent feedback	2021/22 Desistance Analysis
<u>Children, young people, and victims, first and at the center of what we do</u>						YJB Child First Principles: Principle 1 & 2 YJB Strategic Pillars: Pillar 1, Priority 3 National Standards 1 - 5
Restorative Justice – Sue Robertson (Board Member Sponsor), Matt Haynes (Practice Lead)						
Key Indicator – Improve feedback from children/family/parents and victims of crime						
1.	Reapplication RJ marker and associated actions, including a review of the offer to victims of crime.	Matt Haynes (YJS Team Manager) and Carl Woodend (RJ Lead)	End of Q3	Improved victim offers	Reduced re-offending/arrest Increased and improved victim feedback	Restorative Council Code of Practice for Victims of Crime (2021) MOJ
2.	Recruit new Referral Order Panel Volunteers and deliver refresher/new starter training	Abi Jones (YJS Team Manager)	End of Q3	Improved community engagement	Reduced re-offending/arrest Increased and improved victim feedback	Referral Order Guidance (2018)
3.	Development and publishing of Reparative Projects across the Service.	Carl Woodend (RJ Lead)	End of Q4	Improved community engagement	Reduced re-offending/arrest Increased and improved victim feedback	Peer Review 2022
<u>One Coventry Approach – everyone working together to make a difference</u>						YJB Child First Principles: Principle 4 YJB Strategic Pillars: Pillar 2, Priority 1 & 2 National Standards 1 - 5
Joint Strategic City Planning – Chris Heeley/John Gregg (Board Member Sponsor), Nick Jeffreys (Practice Lead)						
Key Indicator – Management Board Attendance at a Senior Level						

Improvement and Business Plan

	Action	Lead	By When	Outcomes	Indicator	Relates Plans/Papers/Source Documents
1.	Engagement in the Youth Justice Subgroup, agreeing regional YJS priorities and reviewing of the West Midlands Out of Court Processes.	Nick Jeffreys (Operational Lead)	End of Q3	Improved regional continuity	Reduced number of children in the YJS	Punishing Abuse Report (2021)
2.	Community Partnership Meeting to continue bi-monthly and mini consortium to be developed for CYJS with benching outcomes returns and expectations; children medium/high risk of exploitation to be included in the pathway.	Stacey Brown (YJS Senior Practitioner), Nick Jeffreys (Operational Lead) and Sinead Hastings (Horizon Team Manager)	End of Q3	Improved oversight and governance for community sector provision.	Increased referral rate to projects. Reduced re-offending/arrest Reduced use of custody	HMIP Domain 1 Self-Assessment Supporting the desistance of children subject to court orders - Buckley and Moore (2021) Police and Crime Commissioner Funding Plan (2022) Mentoring and Peer Mentoring (2021) HMIP
3.	Serious Youth Violence (SYV) Duty – Strategic Needs Assessment to be completed and local plan for governance devised.	Caroline Ryder (Violence Prevention Programme Manager) and Craig Hicken (Head of Environmental Services, Street Scene & Regulatory Services)	End of Q2	Ensure strategic connectivity is effective and achieving desired outcomes	Reduced re-offending/arrest Reduced use of custody Reduced number of first-time entrants	Coventry Youth Violence Prevention Partnership Strategy and Action Plan National Standard 5 Punishing Abuse Report 2021 Serious Violence Duty (2022)
4.	Following the SYV Duty review an agreement on the governance arrangements for 10 Year Violence Prevention Strategy	John Gregg (Director of Coventry Children's Services) and Pete Henrick (Chief Superintendent, Coventry, West Midlands Police)	End of Q2	Ensure strategic connectivity is effective and achieving desired outcomes	Reduce incidents of serious youth violence in the city and reduce the number of children presenting at A&E for such injuries.	Coventry Youth Violence Prevention Partnership Strategy and Action Plan National Standard 5
5.	Establishment of a Coventry Children's Services' Trauma Informed Recovery Support (TIRs) implementation group.	Matt Clayton (Strategic Lead – Looked After Children (Practice))	End of Q4	Ensure resources best used	Reduced number of children in the YJS	Punishing Abuse Report 2021 Local Learning Reviews
6.	Review of local Indicators when the new national indicators are introduced across the Police and Crime Board, Management Board, Safeguarding Partnership.	Letoya Smith (Safeguarding Boards Quality Assurance Manager)	End of Q3	Ensure strategic connectivity is effective and achieving	Reduce incidents of serious youth violence in the city and reduce the number of children	MOJ National Indicator Review

Improvement and Business Plan

	Action	Lead	By When	Outcomes	Indicator	Relates Plans/Papers/Source Documents
				desired outcomes	presenting at A&E for such injuries.	
7.	Embedding Relational Practice across YJS and Children's Services	Katie Rhodes (Restorative Practice Lead)	End of Q4	Family Valued Programme intertwined with the CYJS Vision	Increased and improved child/family/parent feedback	Interim QA Analysis Leeds Family Valued Programme (2017)
8.	Updated performance report presented to Board Members for consideration. Subsequent, Performance Report review regarding assessment of fit for purpose with changing patterns and trends.	All Board Members	End of Q1 End of Q4	Improved performance measuring	Ensure Board Members have a thorough understand of relevant KPIs	Domain 1 Self- Assessment Contextual Safeguarding (2020) HMIP
9.	All Board Members to attend CYJS Team Meetings/Team Days/Half Days to explain their role and remit - continue	All Board Members	End of Q4	Improved team/Board relationships	Reduced re-offending/arrest Reduced use of custody	Domain 1 Self- Assessment
10.	The Partnership YJS Management Meeting to present to the Management Board on their respective lead areas	All Priority Leads	End of Q4	Creating structured and well-defined pathways and processes to services	Reduced re-offending/arrest Reduced use of custody	Interim Quality Assurance Review Action Risk and Desistance: A Blended Approach to Risk Management) - HMIP (2021)
11.	Actions from the Management Board Task and Finish Group paper recommendations: Partnership Independent Chair Proposal Review the current Terms of Reference to reflect the new agreed Management Board vision, objectives, membership criteria and responsibilities	Kirsty Baker (Head of Coventry Probation Delivery Unit) Nick Jeffreys (YJS Operational Lead)	End of Q1 End of Q2	Ensure Board Members have a thorough understand of relevant KPIs	Management Board Attendance at a Senior Level	Task and Finish Group Paper 2022 Plymouth YJS Inspection (2022)
12.	Review of outreach youth work provision in Stoke Aldermoor through the Early Help Outcome 6 Subgroup.	Caroline Ryder (Violence Prevention Programme Manager)	End of Q1	Identify early offer gaps in the city and ensure services are resourced to high need areas	Reduce incidents of serious youth violence in the city and reduce the number of children presenting at A&E for such injuries.	County Lines Analysis – Section 8 2022

Improvement and Business Plan

	Action	Lead	By When	Outcomes	Indicator	Relates Plans/Papers/Source Documents
13.	Informal Peer Review of Management Board	Nick Jeffreys (YJS Operational Lead) and Chris Heeley (Strategic Lead – Help and Protection)	End of Q2	Ensure Board Members have a thorough understand of relevant KPIs	Management Board Attendance at a Senior Level	Peer Review 2022
<p><i>One Coventry Approach – everyone working together to make a difference</i></p> <p style="text-align: right;">YJB Child First Principles: Principle 4 YJB Strategic Pillars: Pillar 3, Priority 1 & 2 National Standards 1 and 2</p> <p>Trauma Informed Practice – Chris Evans/Heather Kelly (Board Member Sponsor), Racheal DamhuisBoogers/Lesa Arms (Practice Leads)</p> <p>Key Indicator – Improve access to mental healthcare: % of children in the community and being released from custody with an identified need for a mental health intervention; and of that % mental health interventions delivered</p>						
1.	Implementation of the Trauma Informed Recovery Support (TIRS) Framework Including a Speech and Language Therapist being seconded into YJS	Nikki Holmes (Vanguard (TIRS) Project Manager – NHS Coventry and Warwickshire ICB) and Lyn Parsons (Clinical Consultant Lead NHSEI Trauma Vanguard Project 2021-2024 NHS Coventry and Warwickshire Clinical Commissioning Group) Nikki Holmes (Vanguard (TIRS) Project Manager – NHS Coventry and Warwickshire ICB)	End of Q4 End of Q2	Having a system that works in a trauma informed way	Reduced number of children in the YJS	NHS England & NHS Improvement Long Term Plan (LTP) Punishing Abuse Report 2021 Local Learning Reviews Serious youth violence and its relationship with adverse childhood experiences - Gray, Smithson and Jump (2021) Neurodiversity – a whole-child approach for youth justice – Kirby (2021) North Tyneside YJS Inspection (2021)
2.	Continued trauma informed spaces for team support and development - monthly informal counselling offer and review at end of year. - piloting of groups by Shaw - Systemics group spaces - closed trauma groups pilot with a Psychotherapist and report to Board to inform next steps.	Racheal DamhuisBoogers (Specialist Mental Health Practitioner (YOT/CAMHS))	End of Q4	Improved team wellbeing	Reduced risk judgements Reduced re-offending/arrest Increased and improved victim feedback	A thematic review of the work of youth offending services during the COVID-19 pandemic – Nov 2020 – Coventry YJS Response Punishing Abuse Report(2021) YJB Skills Audit - 2021

Improvement and Business Plan

	Action	Lead	By When	Outcomes	Indicator	Relates Plans/Papers/Source Documents
3.	Review of additional management and Clinical support following introduction of Service Manager – Roshni from RISE	Roshni Lawson (Service Manager – Specialist Mental Health with additional vulnerabilities Children and Young People – Rise)	End of Q3	Supporting trauma informed approaches across the Service	Reduced risk judgements Reduced re-offending/arrest Increased and improved victim feedback	HMIP 2020 Annual Plan Punishing Abuse Report(2021) Trauma-informed practice (2020) HMIP
4.	Embedding of the intensive multi-agency case consultation (IMACC)	Lesa Arms (YJS Team Manager) and Racheal DamhuisBoogers (Specialist Mental Health Practitioner (YOT/CAMHS))	End of Q4	Improved health assessing and offers to children	Reduced risk judgements Reduced re-offending/arrest Increased and improved victim feedback Reduced number of first-time entrants	Punishing Abuse Report(2021) Trauma-informed practice (2020) HMIP Resilience Model – HMIP Academic Insights (2022)
5.	Consideration for funding to the Antser Virtual Reality Technology allowing the user to experience the impact of trauma, abuse and neglect through the eyes of the child	Lesa Arms (YJS Team Manager) and Ed Baynes Clarke (Schools Violence Reduction Lead)	End of Q2	Earlier identification of needs	Reduced number of children in the YJS	Local Custody Review Analysis Punishing Abuse Report (2021)
6.	Trauma informed training for, Schools, Family Hubs, and wider Children's Services.	Edouard Baynes Clarke (Schools Violence Reduction Lead)	End of Q4	Earlier identification of needs	Reduced number of children in the YJS	Education violence reduction strategy (2020) Early Help Action Plan – Crime and ASB YJB Serious Youth Violence Stocktake Punishing Abuse Report (2021)

Improvement and Business Plan

	Action	Lead	By When	Outcomes	Indicator	Relates Plans/Papers/Source Documents
7.	Team completion (including new starters) of the Trauma Informed Effective Practice Award	Lesa Arms (YJS Team Manager)	End of Q4	Improved health assessing and offers to children	Improve access to mental healthcare for children	Punishing Abuse Report (2021) YJB Serious Youth Violence Stocktake (2021)
8.	Mentors in Violence Prevention, Round Midnight and other preventative interventions to be implemented across schools (focus on those with highest perm exclusion and hotspot areas in Section 8)	Nikki Penniston (Head of Delivery – West Midlands Violence Reduction Partnership) and Edouard Baynes Clarke (Schools Violence Reduction Lead)	End of Q4 2021	Earlier identification of needs	Reduced number of children in the YJS	YJB Serious Youth Violence Stocktake (2021) Punishing Abuse Report (2021) Education violence reduction strategy (2020) 2021 Promising Approaches to Knife Crime – HMIP Research 2022
9.	Family Therapy Review regarding YJS access and consideration for support to Parenting Lead.	Roshni Lawson (Service Manager – Specialist Mental Health with additional vulnerabilities Children and Young People – Rise) and Abi Jones (YJS Team Manager)	End of Q2	Improved health assessing and offers to children	Improve access to mental healthcare for children	Punishing Abuse Report (2021) YJB Serious Youth Violence Stocktake (2021)
10.	Eye Movement Desensitization and Reprocessing (EMDR) training for seconded CAMHS practitioners	Roshni Lawson (Service Manager – Specialist Mental Health with additional vulnerabilities Children and Young People – Rise)	End of Q3	Improved health assessing and offers to children	Improve access to mental healthcare for children	Trauma-informed Interventions for At-Risk and Justice-Involved Youth; A Meta Analysis (Olaghere et al., 2021)
11.	EMDR training for CAMHS in schools	Chris Evans (Associate Director of Operations Mental Health Services for Children & Young People Coventry & Warwickshire Partnership NHS Trust)	End of Q1	Improved health assessing and offers to children	Improve access to mental healthcare for children	Trauma-informed Interventions for At-Risk and Justice-Involved Youth; A Meta Analysis (Olaghere et al., 2021)

Improvement and Business Plan

	Action	Lead	By When	Outcomes	Indicator	Relates Plans/Papers/Source Documents
<p><i><u>Making a difference, Reduce reoffending/Safer communities, Safer children</u></i></p> <p>Tackling Exploitation and Serious Youth Violence – Daryl Lyons (Board Member Sponsor), Sara Graves (Practice Lead)</p> <p>Key Indicator – Reduce incidents of serious youth violence in the city and reduce the number of children presenting at A&E for such injuries.</p>						<p>YJB Child First Principles: Principle 4 YJB Strategic Pillars: Pillar 3, Priority 1 & 2 National Standards 1,3 and 5</p>
1.	Progression of the recommendations following the wider Learning Review into children given life custodial sentences.	Audit and Performance Subgroup Chaired by Neil McDonald (Strategic Lead – Quality Assurance)	End of Q3	Earlier identification of needs	Reduced use of custody Reduce incidents of serious youth violence in the city and reduce the number of children presenting at A&E for such injuries.	Local Learning Review 2022
2.	<p>Safeguarding Partnership to consider the response to the Child Criminal Exploitation Profile under the 'Exploitation' Priority:</p> <ul style="list-style-type: none"> - development of an Updated Exploitation Strategy. - review of current City adolescent offers to ensure these are fit for purpose with a specific focus on pathways away from care and custody (this will include PACE Provision). 	<p>Rebekah Eaves (Business Manager – Coventry Safeguarding Children's Partnership and Adult Board)</p> <p>Matt Clayton (Strategic Lead – Looked After Children (Practice)), Sara Graves (Operational Lead- Responsive Services) and Nick Jeffreys (YJS Operational Lead)</p>	<p>End of Q2</p> <p>End of Q3</p>	Resources for responding to teenage children is best utilised to meet their needs.	<p>Reduce incidents of serious youth violence in the city and reduce the number of children presenting at A&E for such injuries.</p> <p>Reduced number of children in the YJS</p>	<p>Punishing Abuse Report(2021)</p> <p>YJB Serious Youth Violence Stocktake (2021)</p> <p>Local Child Criminal Exploitation Profile (2021)</p> <p>Risk and Desistance: A Blended Approach to Risk Management) - HMIP (2021)</p> <p>Coventry Youth Violence Prevention Board - Youth Violence Literature Review (2020)</p> <p>Contextual Safeguarding (2020) HMIP</p> <p>Brighton and Hove YOS Inspection 2021</p> <p>The Case for Change – MacAlister (2022)</p>
3.	Serious Organised Crime Exchange (SOCEX) are now in place - a review of their role alongside the Youth Violence Reduction Team to ensure mapping, detection and processes for intervention around Child Exploitation/County Lines is robust.	Daryl Lyons (Chief Inspector), Sherrie Kimberley (T/Inspector – Partnerships Manager) and Sara Graves (Operational Lead- Responsive	End of Q4	Robust pathway of support for children at risk of criminal exploitation	Reduce incidents of serious youth violence in the city and reduce the number of children presenting at A&E for such injuries.	Coventry Youth Violence Prevention Board - Youth Violence Literature Review (2020)

Improvement and Business Plan

	Action	Lead	By When	Outcomes	Indicator	Relates Plans/Papers/Source Documents
		Services)			Reduced number of children in the YJS	
4.	Coventry Community Initiative in Reducing Violence (CIRV) Operationalized	Daryl Lyons (Chief Inspector)	End of Q4	Development of 'reachable moment' offers across the city	Reduced number of first-time entrants Reduced incidents of serious youth violence and reduced attendance at A&E for assault injuries	Injustice or in justice – Children's Commissioner - 2020
5.	Review of Serious Youth Violence Forum and the processes for network disruption regarding County Lines	Sherrie Kimberley (T/Inspector – Partnerships Manager) and Nick Jeffreys (YJS Operational Lead)	End of Q3	Earlier identification of needs	Reduced number of first-time entrants	YJB Serious Youth Violence Stocktake (2021) Punishing Abuse Report (2021)
6.	Review of the Local Offender Management Unit regarding the responses to children identified to be linked to Urban Street Gangs	Sherrie Kimberley (T/Inspector – Partnerships Manager)	End of Q1	Robust pathway of support for children at risk of criminal exploitation	Reduced incidents of serious youth violence and reduced attendance at A&E for assault injuries	CSPPI Learning 2021
7.	Management Board Review of mentoring offer for children at low risk of being exploited to be in place with a clearly defined referral pathway	Sharon Bolesworth (Positive Choices Service Manager)	End of Q4	Mentoring offer in place and being well assessed.	Reduced number of first-time entrants	YJB Serious Youth Violence Stocktake (2021)
8.	St Giles to be refunded for the continued reachable moment mentoring offers, known as desist and transform; this covers: under 25s police custody, entered hospital for assault injury, identified concerns identification, and resettlement	Steve Clarke (Contract Manager – St Giles) and Nikki Penniston (Head of Delivery – West Midlands Violence Reduction Partnership)	End of Q1 2022/23	Safe city for children, young people, and families	Reduced incidents of serious youth violence and reduced attendance at A&E for assault injuries Reduced number of first-time entrants	Coventry Youth Violence Prevention Partnership Strategy and Action Plan Domain 1 self- assessment Mentoring and Peer Mentoring (2021) HMIP
9.	Horizon Dashboard to be shared with YJS	Sara Graves (Operational Lead- Responsive Services) and Becky Pearson (Child Exploitation Coordinator)	End of Q2	Robust pathway of support for children at risk of criminal exploitation	Reduced number of first-time entrants	Coventry Youth Violence Prevention Partnership Strategy and Action Plan

Improvement and Business Plan

	Action	Lead	By When	Outcomes	Indicator	Relates Plans/Papers/Source Documents
10.	Min Quarterly intel/info pack disseminated across the team and CSLT to include relevant themes around threat to life and disruption notices relevant to issues affecting children.	Becky Pearson (Child Exploitation Coordinator)	End of Q2	Team/Leader understanding of emerging issues regarding child exploitation	Reduced number of first-time entrants	Coventry Youth Violence Prevention Partnership Strategy and Action Plan
11.	Monthly NRM submission list shared and disseminated among TMs	Adam Good (NRM Manager – SOCEX West Midlands)	End of Q1	Robust pathway of support for children at risk of criminal exploitation	Reduced number of first-time entrants	Cardiff Inspection (2020)
<i>Making a difference, Reduce reoffending/Safer communities, Safer children</i>						YJB Child First Principles: Principle 4 YJB Strategic Pillars: Pillar 1, Priority 3 National Standard 1
Promoting Prevention and Diversion - Overall Leads - Nigel Patterson/Craig Hicken, Katy Callender and Lesa Arms (Practice Lead)						
Key Indicator – Reduce the number of children in the youth justice system						
1.	Continued Development of a single referral route for targeted diversion intervention for the third sector, complimenting existing targeted youth work offer through the Family Hubs and PCSOs by the Violence Reduction Team. Tracking off all children arrested, and intervention pathwaysthrough targeted third sector provision (for example, St Giles)	Rebecca Farr (Partnerships Inspector)	End of Q4	Earlier identification children at highest risk	Reduced number of first-time entrants	Early Help Action Plan – Crime and ASB Coventry Youth Violence Prevention Partnership Strategy and Action Plan HMIP South Gloucestershire (2021) Report
2.	CYJS review of arts-based intervention offers and review against areas for Artsmark Award through the Arts Council.	Nick Jeffreys (Operational Lead) and Tianne Peynado (Engagement and Development Officer)	End of Q2	Improved arts offer for children	Reduced re-offending/arrest Reduced use of custody	HMIP Sandwell Inspection (2018) Youth Justice Plan 2021
3.	Coventry Youth Partnership to present the mentoring dashboard for early offers to Management Board	Rashid Bhayat (Positive Youth Foundation)	End of Q2	Increased strategic engagement with the 3 rd sector	Reduced number of first-time entrants	Punishing Abuse Report (2021) Domain 1 Self-Assessment
4.	Continued roll out and evaluation of the Youth Worker offer following Police Only Community Resolutions – quarterly updates	Nigel Patterson (Early Help Manager)	End of Q4	Improved diversion pathways	Reduced number of first-time entrants	Early Help Action Plan – Crime and ASB OOCOD Strategy 2021

Improvement and Business Plan

	Action	Lead	By When	Outcomes	Indicator	Relates Plans/Papers/Source Documents
5.	Diversion Offer numbers to increase and external evaluation to be progressed; the evaluation will include the Police referral pathway to appropriate community offers at the point of arrest.	Lesa Arms (CYJS Team Manager) and Tony Halon (Sgt Partnerships)	End of Q3	Improved diversion pathways	Reduced number of first-time entrants	Early Help Action Plan – Crime and ASB
6.	Continued review of regional/national offers for Outcome 22 and local pilot; review following publication of the Turning Point Project; Chance to Change that is expected to be published in 2022/23	Nick Jeffreys (Operational Lead) and Ryan Chambers (Detective Chief Inspector FCID)	End of Q2	Improved diversion pathways	Reduced number of first-time entrants	HMIP Annual Report 2021/22 OCCD Strategy 2021
7.	Review funding for Violence Reduction Partnership Programme Manager	Management Board	End of Q3	Resources for responding to teenage children is best utilised to meet their needs.	Management Board Attendance at a Senior Level	Early Help Action Plan – Crime and ASB Coventry Youth Violence Prevention Partnership Strategy and Action Plan
8.	Life skills programme to be developed mirroring the programme delivered in the Through Care Service and use of the Training Flat	Tianne Peynado (Engagement and Development Officer)	End of Q4	Children closing to CYJS have skills to live independently	Reduced re-offending/arrest	Punishing Abuse Report (2021)
9.	Resilience analysis for children open to YJS to inform early offers.	Racheal DamhuisBoogers (Specialist Mental Health Practitioner (YOT/CAMHS))	End of Q3	Improved health assessing and offers to children	Improve access to mental healthcare for children	Punishing Abuse Report (2021) Systemic Resilience – HMIP Academic Insights (2022)
10.	Toolkit of tiered interventions across the City to be shared across the Partnership	Eve Linstead (Education Lead)	End of Q4	Improved diversion pathways	Reduced number of first-time entrants	Early Help Action Plan – Crime and ASB Coventry Youth Violence Prevention Partnership Strategy and Action Plan
11.	Management Board review of Turnaround Funding and expansion of existing early help offers.	Management Board	End of Q2	Improved diversion pathways	Reduced number of first-time entrants	Early Help Action Plan – Crime and ASB MOJ 2022 – Turnaround Scheme

Making a difference, Reduce reoffending/Safer communities, Safer children

**YJB Child First Principles: Principle 3
YJB Strategic Pillars: Pillar 1, Priority 3
National Standard 5**

Education, Training and Employment – Rachael Sugars/Jas Madahar (Board Member Sponsor), Eve Linstead (Practice Lead)

Key Indicator – Improve ETE engagement and attainment for children in the youth justice system

Improvement and Business Plan

	Action	Lead	By When	Outcomes	Indicator	Relates Plans/Papers/Source Documents
1.	Management Board review of the progression of the Education Violence Reduction Action Plan	Edouard Baynes Clarke (Schools Violence Reduction Lead)	End of Q3	Earlier identification children at highest risk	Reduced number of first-time entrants	Education violence reduction strategy (2020)
2.	Seconded Speech and Language complete a Service needs assessment and present to Management Board, alongside development of an awareness video on children with speech and language needs.	Nikki Holmes (Vanguard (TIRS) Project Manager - NHS Coventry and Warwickshire ICB) and Eve Linstead (Education Lead)	End of Q3	Improved identification and offer to children with speech, language, and communication needs.	Increased and improved child/family/parent feedback Reduced re-offending/arrest	SEND inspection 2019 Punishing Abuse Report(2021) Neurodiversity – a whole-child approach for youth justice – Kirby (2021)
3.	Review of Key Stage 4 – identification of good practice examples and consideration for learning – presentation to management Board for actions where identified.	Kevin Coughlan (Performance Manager)	End of Q4	Earlier identification children at highest risk	Improved ETE attendance and attainment	Understanding the educational background of young offenders (DFE, 2019) Youth Justice Plan 2021-23
4.	Continued development of identification of sympathetic local employers	Hannah Parry (Prospects - Senior Careers Adviser) and Eve Linstead (Education Lead)	End of Q2	Improved employment pathways	Improved ETE attendance and attainment	HMIP Annual Report (2020) Interim QA Analysis
5.	Coordination of the 2 nd year of the Chances Programme delivered by Positive Youth Foundation	Rachael Sugars (Head of Service – Education Improvement and Standards) and Jo Monk (Inclusion and Attendance Manager)	End of Q4	Earlier identification children at highest risk	Reduced number of first-time entrants	Injustice or in justice – Children’s Commissioner – 2020 Custody Learning 2021
6.	Review of the ‘Back on Track’ Programme by Wolverhampton Youth Justice Service	Matthew Haynes (YJS Team Manager)	End of Q3	Improved pathways for children back into mainstream school	Improved ETE attendance and attainment Reduced number of first-time entrants	Wolverhampton Inspection (2022)

Improvement and Business Plan

	Action	Lead	By When	Outcomes	Indicator	Relates Plans/Papers/Source Documents
7.	Continued AQA accrediting of all interventions	Eve Linstead (Education Lead)	End of Q4	Improved employment pathways	Improved ETE attendance and attainment	HMIP Birmingham Inspection (2020) Youth Justice Plan 2021
8.	Review datasets for school age and non-school age children considering family group/national comparisons, particularly around educational attachment. Prospects to develop a comparator data set across neighbours where commissioned – consider attainment (levels) for end of Year 13; to include tracking of cohort to understand young person's educational journey.	Rachael Sugars (Head of Service – Education Improvement and Standards) and Jas Madahar (Operations Manager, Young People & Families Coventry & Warwickshire)	End of Q2	Ensure Board Members have a thorough understand of relevant KPIs	Improved ETE attendance and attainment	Understanding the educational background of young offenders (DFE, 2019)
9.	Management Board Review of children at risk of not being included in education (RONI)/ / local 'out of sight' dataset to consider the robustness of early pathways.	Rachael Sugars (Head of Service – Education Improvement and Standards) and Ed Baynes Clarke (Schools Violence Reduction Lead)	End of Q2	Improved pathways for children back into mainstream school	Improved ETE attendance and attainment	Timpson Review 2019 Custody Learning 2021
<u>Workforce valued, motivated, skilled, confident, and sustainable</u>						YJB Child First Principles: Principle 3 YJB Strategic Pillars: Pillar 1, Priority 1 & 2 National Standards 1 - 5
Workforce Development – Mamps Gill (Board Member Sponsor), Nick Jeffreys (Practice Lead)						
Key Indicator – Improve feedback from children/family/parents and victims of crime						
1.	Develop a pathway for completion of the foundation degree in Youth Justice– 1 st employee enrolled	Sarb Bhabra (Principal Social Worker) and Nick Jeffreys (YJS Operational Lead)	End of Q3	Practitioners will be part way through a Youth Justice Degree	Increased and improved child/family/parent feedback	Workforce Development Analysis and Strategy (2021) Youth Justice Plan 2021
2.	Re-completion of YJS Matrix and subsequent review of the training planner.	Tianne Peynado (Engagement and Development Officer)	End of Q3	Improved team confidence, knowledge and skills	Increased and improved child/family/parent feedback	Workforce Development Analysis and Strategy (2021) HMIP Annual Report (2020) HMIP Resettlement Thematic (2021) (2021) Youth Justice Plan 2021

Improvement and Business Plan

	Action	Lead	By When	Outcomes	Indicator	Relates Plans/Papers/Source Documents
3.	Annual Team supervision survey	Nick Jeffreys (Operational Lead)	End of Q2	Improved supervision framework	Increased and improved child/family/parent feedback	Domain 1 self- assessment
4.	Continue to explore possible 'Positive Action' recruitment to ensure the service better reflects the community and review example of best practice approaches from other Youth Justice Services.	Nick Jeffreys (Operational Lead)	End of Q4	Increased team diversity	Increased and improved child/family/parent feedback	Workforce Development Analysis and Strategy (2021) 2021 Youth Justice Plan 2021
5.	Review of the Workforce Development Strategy 2021-23 Workforce Review in preparation for the - review team demographics/workforce development strategy for review in 2023	Sarb Bhabra (Principal Social Worker) and Nick Jeffreys (YJS Operational Lead)	End of Q4	Increased team diversity	Increased and improved child/family/parent feedback	Workforce Development Analysis and Strategy (2021) 2021
6.	Review of Champion Areas across the Service and re-sharing of the Champions list.	Tianne Peynado (Engagement and Development Officer)	End of Q3	Improved service knowledge and expertise	Increased and improved child/family/parent feedback	Domain 1 self- assessment
7.	Exploration of a lived experienced apprenticeship	Tianne Peynado (Engagement and Development Officer)	End of Q2	Increased team diversity	Increased and improved child/family/parent feedback	Workforce Development Analysis and Strategy (2021) 2021
8.	Actions as per quality assurance framework	Nick Jeffreys (Operational Lead)	End of Q4	The quality of will be of good or outstanding when measured against HMIP standards	Reduced re-offending/arrest Reduced use of custody	Workforce Development Analysis and Strategy (2021)
9.	Youth Justice Sector Improvement Partnership training offers to be attended by Team Managers and Senior Practitioners	Nick Jeffreys (Operational Lead)	End of Q4	The quality of will be of good or outstanding when measured against HMIP standards	Reduced re-offending/arrest Reduced use of custody	Workforce Development Analysis and Strategy (2021)

Improvement and Business Plan

	Action	Lead	By When	Outcomes	Indicator	Relates Plans/Papers/Source Documents
10.	Once the YJB Grant is confirmed, Children's Services Senior Leadership Team to be with resourcing needs following the IT Needs Analysis	Karyn Bacon (Business Systems Manager (Children's Services)) and Nick Jeffreys (YJS Operational Lead)	End of Q2	Improved IT support to CYJS	Increased and improved child/family/parent feedback	Domain 1 self- assessment Youth Justice Plan 2021
11.	Team Gender Identity Training	Tianne Peynado (Engagement and Development Officer)	End of Q2	Improved team confidence, knowledge and skills	Increased and improved child/family/parent feedback	Team consultation and Section 8
<i>Service open and honest – listening, responsive, effective, and safe</i>						YJB Child First Principles: Principle 3 & 4 YJB Strategic Pillars: Pillar 3, Priority 3 & 4 National Standards 4 and 5
Continued National Standard Learning – Standards 4 and 5 – Kirsty Baker (Board Member Sponsor), Hannah Darby (Practice Lead)						
Key Indicator – Reduce reoffending by children in the youth justice system						
1.	Once the Youth National Offender Management in Custody (OMIC) process is published, to be considered locally for implementation and ratification in the local YOT to Probation transfer process.	Abi Jones (Team Manager)	End of Q2	Improved transition arrangements	Reduced re-offending/arrest Reduced use of custody	National Standard Self- Assessment Youth Justice Plan 2021
2.	Review process for AssetPlus sharing with secure estates.	Stacey Brown (YJS Senior Practitioner)	End of Q2	Ensure CYJS and Secure Estates have up to date shared assessments	Reduced re-offending/arrest Reduced use of custody	National Standard Self-Assessment HMIP Camden (2020)Report
3.	Continued Management Board tracking and oversight of children leaving custody, alongside reviewing the learning process to ensure dissemination and reflection across the whole partnership.	Stacey Brown (YJS Senior Practitioner)	End of Q4	Improved outcomes for children leaving custody	Reduced re-offending/arrest Reduced use of custody	National Standard Self-Assessment Contextual Safeguarding(2020) HMIP Youth Justice Plan 2021
4.	Continue custody reviews for all children to assess learning and feed into Management Board action with learning presented to the Extended Health and Protection Managers Meeting	Nick Jeffreys (Operational Lead)	End of Q4	The quality of will be of good or outstanding when measured against HMIP standards	Reduced re-offending/arrest Reduced use of custody	Resettlement Strategy – recommendations (2021) Youth Justice Plan 2021

Improvement and Business Plan

	Action	Lead	By When	Outcomes	Indicator	Relates Plans/Papers/Source Documents
5.	Individualised secure estate packs to be provided to families as required with support from Commissioning where appropriate.	Stacey Brown (YJS Senior Practitioner) and Tianne Peynado (Engagement and Development Officer)	End of Q4	Improved outcomes for children leaving custody	Reduced re-offending/arrest Reduced use of custody	National Standard Self-Assessment
6.	Development of Probation and Prospects Pathway for Young Adults.	Jas Madahar (Operations Manager, Young People & Families Coventry & Warwickshire) and Matt Sharp (Senior Probation Officer - Coventry Probation)	End of Q2	Improved access to ETE for young adults	Improved ETE engagement and attainment	Coventry Youth Violence Prevention Partnership Strategy and Action Plan
7.	Review of children's experience of custody through 1 to 1 engagement to inform review of resettlement strategy 6-month specific	Stacey Brown (YJS Senior Practitioner) and Tianne Peynado (Engagement and Development Officer)	End of Q3	Improve understanding of children's lived experience	Reduced re-offending/arrest Reduced use of custody	HMIP Report -Children in Custody (2019-20)
8.	Parents Against Child Exploitation (PACE) Training Programme across Horizon and YJS	Becky Pearson (Child Exploitation Coordinator)	End of Q4	Earlier identification of needs	Reduced re-offending/arrest Reduced number of first-time entrants	Resettlement Strategy – recommendations (2021)
9.	Resettlement Key Worker support offer reviewed, alongside regional St Giles Resettlement Service	Stacey Brown (YJS Senior Practitioner) and Tianne Peynado (Engagement and Development Officer)	End of Q4	Increased mentoring access by children	Reduced re-offending/arrest	Resettlement Strategy– recommendations (2021) Youth Justice Plan 2021
10.	Annual programme established for exploitation awareness raising training across CYJS, Horizon, Children's Services, School, and the Police.	Becky Pearson (Child Exploitation Coordinator)	End of Q4	Earlier identification of needs	Reduced incidents of serious youth violence in the city and reduce the number of children presenting at A&E for such injuries. Reduced number of first-time entrants	Resettlement Strategy– recommendations (2021)

Improvement and Business Plan

	Action	Lead	By When	Outcomes	Indicator	Relates Plans/Papers/Source Documents
11.	National Standard re-assessment following final recommendations from the Service review being undertaken by Lee Westlake. The re-assessment will put specific focus on exit strategies for children's transitions ending to CYJS and the sequencing of interventions based on need prioritization.	CYJS Management Team	End of Q4	The quality of will be of good or outstanding when measured against HMIP standards	Increased and improved child/family/parent feedback	CYJS Auditing 2021/22 HMIP Annual Report 2021
<u>Service open and honest – listening, responsive, effective and</u>						YJB Child First Principles: Principle 3 & 4 YJB Strategic Pillars: Pillar 3, Priority 3 & 4 National Standards 1 - 5
Addressing Disproportionately - Overall Leads – Sharon Bolesworth (Board Member Sponsor), Abi Jones (Practice Lead)						
Key Indicator – Reduce racial disparity for children in the youth justice system						
1.	Top tips for working with girls in the Youth Justice System and local bespoke offer enacted	Abi Jones (YJS TeamManager)	End of Q4	Improved transition arrangements	Reduced re-offending/arrest Reduced use of custody	National Standard Self-Assessment Punishing Abuse Report(2021)
2.	Specific inclusion within the Early Help strategy to support black and dual heritage boys to feed into reducing their overrepresentation in the criminal justice system; this will then feed into all strategies across Children's Services.	Nigel Patterson (Early Help Manager)	End of Q3	Reduce racial disparity in the youth justice system	Reduced re-offending/arrest Reduced number of first-time entrants	Tackling racial disparity in the criminal justice system: 2020/21 Lammy Review (2017) YJB Disproportionality Assessment (2021/22) HMIP Thematic – Experiences of Black and Mixed Heritage Children in the YJS (2021)
3.	CYJS team to have attended cultural awareness training to ensure they are empowered to have culturally competent conversations with all children about their identity.	Abi Jones (YJS TeamManager)	End of Q3	Reduce racial disparity in the youth justice system	Reduced re-offending/arrest Reduced number of first-time entrants	Tackling racial disparity in the criminal justice system: 2020/21 Lammy Review (2017) YJB Disproportionality Assessment (2021/22) HMIP Thematic – Experiences of Black and Mixed Heritage Children in the YJS (2021) Plymouth YJS Inspection (2022)

Improvement and Business Plan

	Action	Lead	By When	Outcomes	Indicator	Relates Plans/Papers/Source Documents
4.	Exploration with the Insight Team how diversity information can be incorporated into Coventry's Strategic Joint Needs Assessment to help all colleagues better understand the intersectionality of diversity issues and be able to identify themes and patterns, leading to targeted support and intervention.	Abi Jones (YJS TeamManager)	End of Q4	Reduce racial disparity in the youth justice system		Tackling racial disparity in the criminal justice system: 2020/21 Lammy Review (2017) YJB Disproportionality Assessment (2021/22) HMIP Thematic – Experiences of Black and Mixed Heritage Children in the YJS (2021)
5.	Nick Jeffreys to make a specific formal request of the Children's Services Leadership Team for disproportionality to feature in the Coventry safeguarding Children's Partnership priorities either as a stand alone priority, or as a key feature in every other priority to ensure disproportionality is tracked and evaluated using a secure multi-agency process. By the end of Q2.	Nick Jeffreys (YJS Operational Lead) and Neil McDonald (Strategic Lead – Quality Assurance)	End of Q2	Reduce racial disparity in the youth justice system	Reduce incidents of serious youth violence in the city and reduce the number of children presenting at A&E for such injuries.	Tackling racial disparity in the criminal justice system: 2020/21 Lammy Review (2017) YJB Disproportionality Assessment (2021/22) HMIP Thematic – Experiences of Black and Mixed Heritage Children in the YJS (2021)
6.	The Task and Finish HMIP disproportionality group to have understood from the placements team how diversity issues form a part of placement requests and seek to support any possible areas for development.	Abi Jones (YJS TeamManager) and Shoayb Khalifa (Operational Lead, Placements)	End of Q3	Reduce racial disparity in the youth justice system	Reduce incidents of serious youth violence in the city and reduce the number of children presenting at A&E for such injuries.	Tackling racial disparity in the criminal justice system: 2020/21 Lammy Review (2017) YJB Disproportionality Assessment (2021/22) HMIP Thematic – Experiences of Black and Mixed Heritage Children in the YJS (2021)
7.	The procurement of St Giles and Guiding Young Minds (Youth Engagement projects) for the coming year 2022-23, to improve the diversity of offer to children, as part of PCC Plan, and offers to children at medium/high risk of exploitation	Stacey Brown (YJS Senior Practitioner)	End of Q4	Improved diversity of offer and support over-representative - entry	Reduced number of first-time entrants Reduced re-offending/arrest Reduced use of custody	Workforce Development Analysis and Strategy (2021) HMIP Thematic – Experiences of Black and Mixed Heritage Children in the YJS (2021) Punishing Abuse Report(2021) Youth Justice Plan 2021
8.	Management Board of the 'levelling the playing field' mentoring offer and clear mentoring pathway defined between CYJS and Horizon.	Rashid Bhayat (Positive Youth Foundation)	End of Q2	Increased engagement with the 3 rd sector	Reduced number of first-time entrants	Domain 1 Self- assessment Mentoring and Peer Mentoring (2021) HMIP

Improvement and Business Plan

	Action	Lead	By When	Outcomes	Indicator	Relates Plans/Papers/Source Documents
9.	Kitchen Table Talks to be available to CYJS and Horizon, and local parenting peer group developed	Mandy Allen (YJS Parenting Lead)	End of Q2	Reduce racial disparity in the youth justice system	Reduced number of first-time entrants Reduced re-offending/arrest Reduced use of custody	West Midlands Violence Reduction Unit Evaluation - Serious Youth Violence pathfinder: Evaluation report – April 2021
10.	Reducing the Unnecessary criminalisation of Looked After Children reviewed and impact analysis.	Natasha Stirling (Operational Lead – Through Care) and Nick Jeffreys (Operational Lead YJS)	End of Q4	Reduce the number of Children Looked After in YJS	Reduced number of first-time entrants Reduced re-offending/arrest Reduced use of custody	Section 8 Analysis 2022
11.	Management Board to be presented within the quarterly Management Board Reports a breakdown of Children's Services involvement with children open to CYJS for consideration/action where needed.	Dave Woodhouse (Lead Data Analyst)	End of Q2	Ensure Board Members have a thorough understand of relevant KPIs	Management Board Attendance at a Senior Level	Section 8 Analysis 2022

Sign off, submission and approval



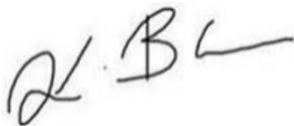
..... (Signature)

John Gregg - Director of Children's Services for Coventry (Management Board Chair)



..... (Signature)

Daryl Lyons Chief Inspector, Crime Manager, Coventry Neighborhood Policing Unit



..... (Signature)

Kirsty Baker – Head of Coventry Probation Delivery Unit



..... (Signature)

Heather Kelly – Head of Transformation (Children and Young people), NHS Coventry, and Warwickshire Integrated Care Board

Date: 21.07.2022

Appendix 1 – Management Board Membership

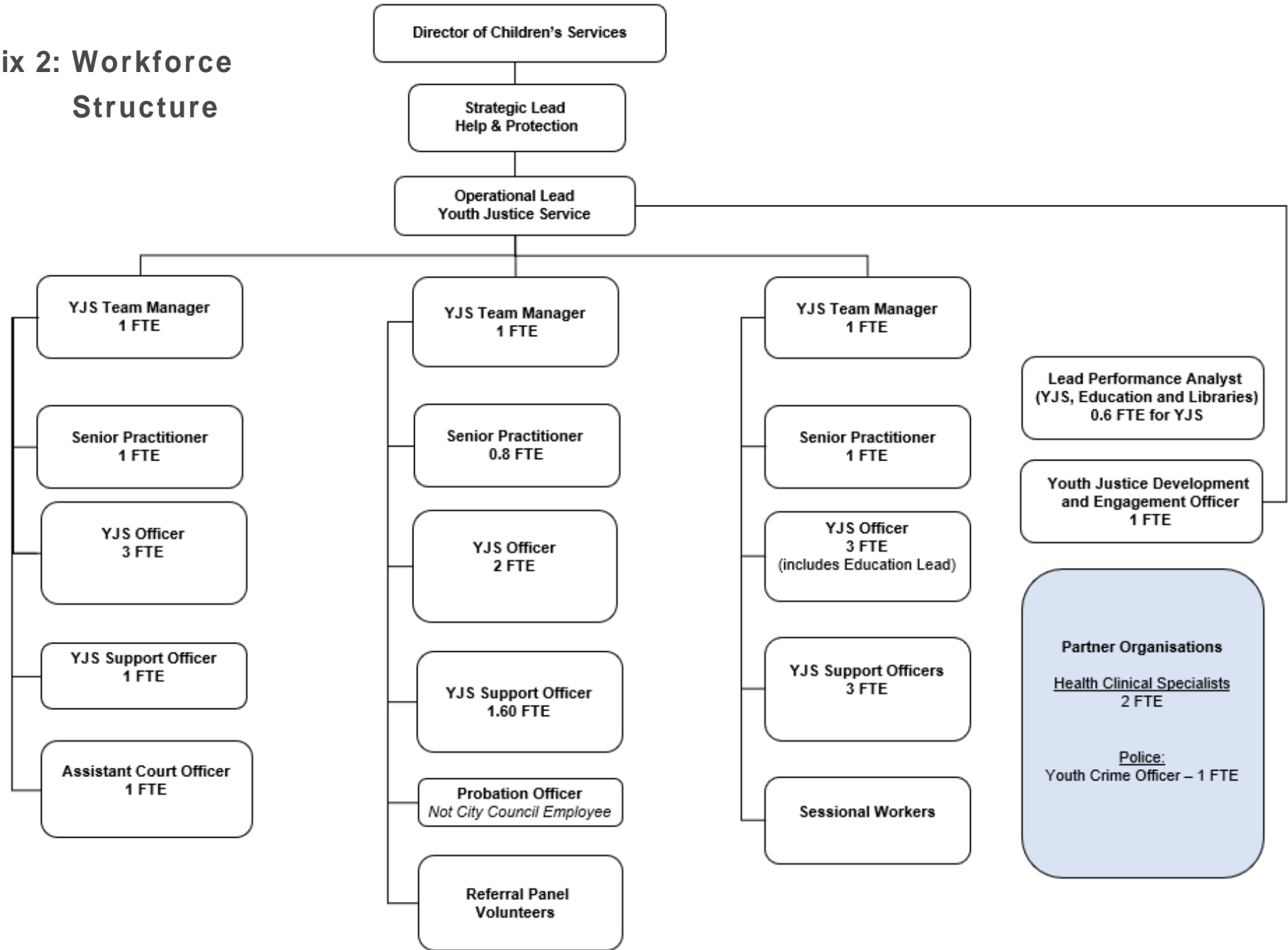
Name	Title	Attendance*
Daryl Lyons	Chief Inspector, Crime Manager, Coventry Neighborhood Policing Unit - West Midlands Police. Previously Paul Southern	Q1, Q2, Q3, Q4
Jas Madahar	Operations Manager, Coventry & Warwickshire Prospects Service	Q1, Q3, Q4
Heather Kelly	Head of Transformation (Children and Young people), NHS Coventry, and Warwickshire Clinical Commissioning Group	Q1, Q2 (interim member attended) Q3
Chris Evans	Associate Director of Operations, Mental Health Services for Children & Young People, Coventry & Warwickshire Partnership NHS Trust	Q2, Q3, Q4
John Gregg (Chair)	Director of Children's Services for Coventry, Coventry City Council	Q1, Q2, Q3, Q4
Sue Robertson	Chair of the Youth Panel	Q1, Q3, Q4
Sharon Bolesworth	Positive Choices Service Manager	Q1, Q3
Jim Horgan	Head Teacher, Coventry Virtual School (formerly LACES), Coventry City Council	Q2, Q3, Q4
Racheal Sugars	Head of Service, Education Entitlement, Coventry City Council	Q1, Q2, Q3, Q4
Nigel Paterson	Early Help Manager, Early Help & Family Hubs (Central), Coventry City Council	Q1, Q2, Q3
Caroline Ryder	Violence Prevention - Programme Manager (Shared post Coventry City Council and West Midlands Police)	Q2, Q3, Q4
Craig Hickin	Head of Environmental Services, Street Scene & Regulatory Services, Coventry City Council	Q4 (representative attended Q1, Q2, Q3)
Kirsty Baker (Deputy Chair)	Head of Coventry Probation Delivery Unit	Q1, Q2, Q3, Q4
Chris Heeley	Strategic Lead for Help and Protection, Coventry City Council	Q1, Q4
Mamps Gill	Youth Justice Board - Head of Innovation & Engagement – Midlands	Q1, Q2, Q3, Q4

*Attendance does not include deputies unless specified. Where members have changed mid-year, attendance has been included from the predecessor. Two additional Board Member development events took place on 4th May 2022 and 23rd November 2021.

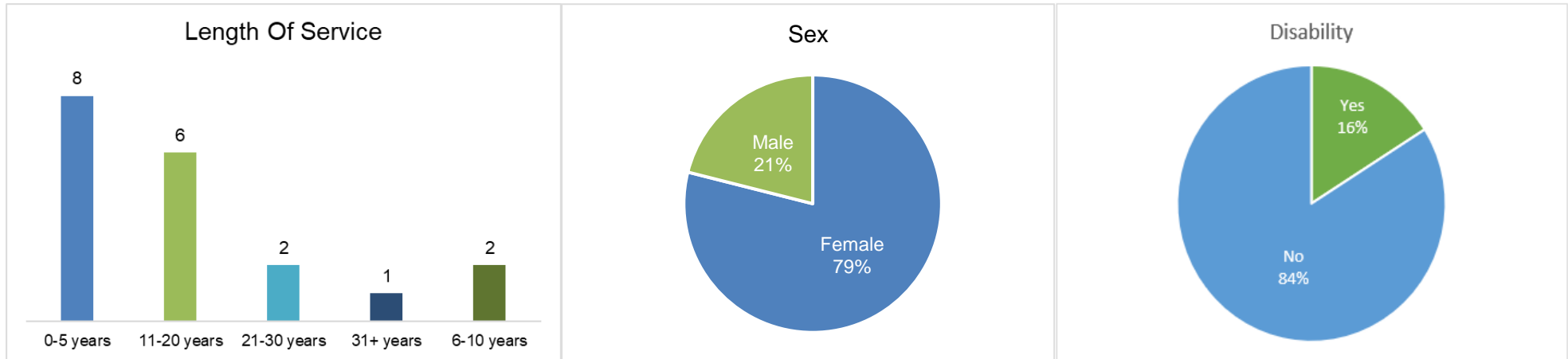
2021/22 Board Dates:

- Quarter 1 – 12th August 2021
- Quarter 2 – 18th November 2021
- Quarter 3 – 10th February 2022
- Quarter 4 – 12th May 2022

Appendix 2: Workforce Structure



Appendix 2: Workforce Structure Demographics



YJS Staff Ethnic Origin including Sessional Workers and Volunteers

Ethnic Origin	White British	White Other	Indian	African	Mixed Heritage	Black Other	Asian	Total
Strategic Manager	1							1
Team Managers	3							3
Practitioners	12	2	2		1	2		19
Administration	2		2				1	5
Sessional Workers	7	1	2	1		3		14
Volunteers	10	1		1		2	3	17
Total	21	18	6	2	1	7	4	59

Appendix 3: Budget and Spend 2022/23

CYJS Finance Tables (2022/23)

2022-23 Youth Justice Service Partner Contributions to Pooled Budget

Agency	Staffing costs	Payments in kind	Other delegated funds	Total
Local Authority	613,924		131,127	745,051
Youth Justice Board	390,871		140,736	531,607
Police Service		59,507		59,507
Police and Crime Commission	60,444		44,620	105,064
National Probation Service		50,496	5,000	55,496
Health Service		116,526	13,309	129,835
Total	1,065,239		444,288	1,626,560

* The YJB budget, at the time of writing, had not been confirmed, though confirmation was given that the grant would be no less than the Core Grant from 2021/22; the plan has been written on this basis.

* The payments for services in kind relate to staffing costs for employees working within the Youth Justice Service.

Youth Justice Service Pooled Budget Changes

Agency	Annual Budget	
	2021-22	2022-23
Local Authority	738,663	745,051
Youth Justice Board	578,470	531,607
Police Service	58,235	59,507
Police and Crime Commission	105,064	105,064
National Probation Service	48,400	55,496
Health Service	112,164	129,835
Budget	1,640,996	1,626,560

Comments

* The change to local authority contribution is as a result of increased costs (eg staff spinal points and increments, increases in National Insurance)

* The change to YJB budget is as a result of a one year grant uplift 21-22, with 22-23 to be confirmed

Appendix 3: Budget and Spend 2022/23

2021-22 Youth Justice Board Grant

YJB grant budget	Budget	Forecast outturn	over / under spend forecast
Salaries	390,871	390,871	0
Activity costs	37,603	37,603	0
Overheads	99,048	99,048	0
Equipment	25	25	0
Accomodation	4,060	4,060	0
Total	531,607	531,607	0

Comments

* This is based on the 21-22 allocation prior to uplift as funding has not yet been awarded

Appendices 4 – Quality Assurance Activity Schedule

COVENTRY CHILDREN'S SERVICES - CYJS																
Quality Assurance Activity Schedule: 1st April 2022– 31st March 2023																
Youth Justice Service																
Theme	Purpose	Context / Source	Auditors	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Jan	Feb	Mar	Comments
Practice Observations	Review the quality of child sessions.	All HMIP Domains and National Standards	CYJS Team Managers and Senior Practitioners			X			X			X				Frequency may be higher, dependent on audit learning. Individual learning areas to be action/tracked in supervision, and broader learning will be completed through practitioners' monthly workshops.
Threshold Analysis - Out of Court Disposals	To test the application of Association of Chief Police Officers (ACPO) Gravity Matrix (2013) and the Youth Out of Court Disposals; Guide for Police and Youth Offending Services; are decisions in line with this and, where appropriate, appropriate escalation has taken place.	HMIP Domain 3 and National Standard 2/ ACPO Guidance	Lead Manager Operational Lead CYJS Management Board		X			X			X			X		Reviewed through quarterly Management Board and actions then monitored through the Board
Threshold Analysis - PACE - Quarterly Board Report	To test the application of the Police and Criminal Evidence Act (PACE) (1984), are decision in line with this and, where appropriate, has sufficient challenge taken place.	HMIP Domain 2/3 and National Standard 2/3 PACE (1984)	Lead Manager Operational Lead CYJS Management Board		X			X			X			X		Reviewed through quarterly Management Board and actions then monitored through the Board
Threshold Analysis - Remands - Quarterly Board Report	To test the application of Legal Aid Sentencing Punishment of Offender's Act (2012) - are decisions in line with the guidance and has the Service taken appropriate action to offer appropriate community measures, where appropriate.	Legal Aid Sentencing Punishment of Offender's Act (2012)/ National Standard 4	Lead Manager Operational Lead CYJS Management Board		X			X			X			X		Reviewed through quarterly Management Board and actions then monitored through the Board
Threshold Analysis - First Time Entrants - Quarterly Board Report	To test the application of YJB and ACPO guidance, are decisions in line with guidance and do interventions reflect assessed need.	ACPO Guidance/HMIP Domain 1 Governance	Operational Lead CYJS Management Board		X			X			X			X		Reviewed through quarterly Management Board and actions then monitored through the Board
Youth Justice Board National Standard Self-Assessment	To test the embedment of new guidance introduced across 2020/21 following the National Standard Self-Assessment in early 2019/20.	All HMIP Domains and National Standards	CYJS Team Managers and Senior Practitioners	X	X	X	X	X	X	X	X	X	X	X	X	Actions for National Standard progression covered in the 2021/22 Action Plan. Individual learning areas to be action/tracked in supervision, and broader learning will be completed through practitioners' monthly workshops.
Supervisions	Annual Supervision Staff Review	HMIP Domain 1 Governance	Operational Lead				X									Any feedback to be provided direct to Team Manager and associated development actions monitored for completion through supervision.

Theme	Purpose	Context / Source	Auditors	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Jan	Feb	Mar	Comments
AssetPlus Timeliness	To ensure assessments are completed in a timely manner.	National Standard 2 and 3	CYJS Team Managers and Senior Practitioners	X	X	X	X	X	X	X	X	X	X	X	X	<i>Any associated actions will be reviewed through Management Meetings and Service learning delivered through practitioners' monthly workshops.</i>
AssetPlus Quality Assurance	All AssetPlus assessments to be quality assured and feedback provided where amendments are required. Timeliness of assessments reviewed through weekly CYJS Management Meeting.	All HMIP Domains and National Standards	All CYJS Team Managers and Senior Practitioners	X	X	X	X	X	X	X	X	X	X	X	X	<i>Continually completed with timeliness tracked through CYJS Management Meetings on a weekly basis. Any associated actions will be reviewed through Management Meetings and Service learning delivered through practitioner's monthly workshops.</i>
Missing Reporting	All Missing Notifications provided to CYJS for relevant children and Return Home Interviews.	National Standard 3	Lead Manager		X			X			X			X		<i>Ongoing action being monitored on a quarterly basis through CYJS Management Meeting.</i>
Report Gatekeeping	Quality Assurance for all Pre-Sentence Reports.	National Standard 2 and 4	All CYJS Team Managers	X	X	X	X	X	X	X	X	X	X	X	X	<i>Continually completed with timeliness tracked through CYJS Management Meetings on a weekly basis. Any associated actions will be reviewed through Management Meetings and Service learning delivered through practitioner's monthly workshops.</i>
Supervision Observations	Observations of supervision to be undertaken (one per manager)	HMIP Domain 2 and 3	Operational Lead										X			<i>Any feedback to be provided direct to Team Manager and associated development actions monitored for completion through supervision.</i>
Direct Work Observations	Observations of practice to be undertaken (min one per staff member over 12month period)	HMIP Domain 2 and 3	All CYJS Management												X	<i>Individual learning areas to be action/tracked in supervision, and broader learning will be completed through practitioners' monthly workshops. Higher frequency where needs identified and as part of other processes (for example, probation/induction period).</i>
External Review	To ensure that practice is in line with the HMIP Standards 2 and 3 and identify further areas for development.	HMIP 2 and 3	Lee Westlake Ltd	X	X	X	X	X	X							<i>The monthly auditing has fed into the key areas of exploration, namely a focus on risk/contingency planning.</i>

Appendix 5- Performance Information

First Time Entrants

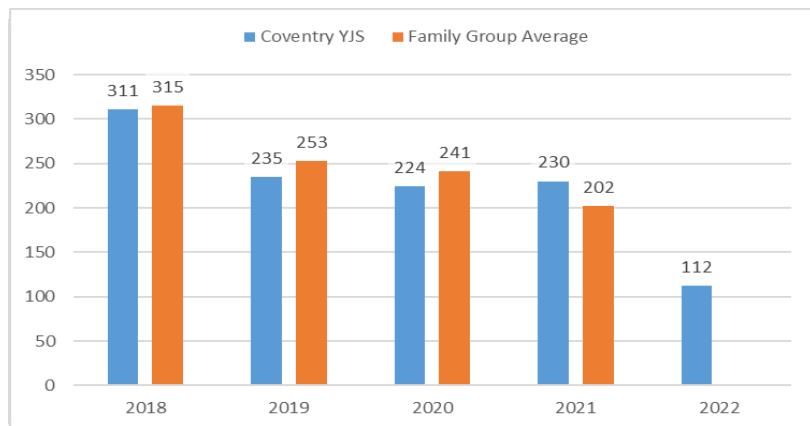


Table 1: FTEs per 100,000 of the 10–17-year-old population, Coventry YJS 2018-22

Reoffending

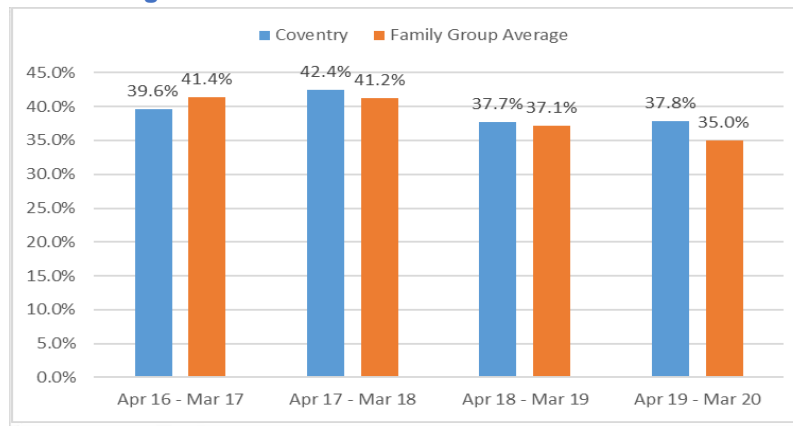


Table 2: Children/Young People reoffending within a year, Coventry YJS 2016-2020

Use of Custody

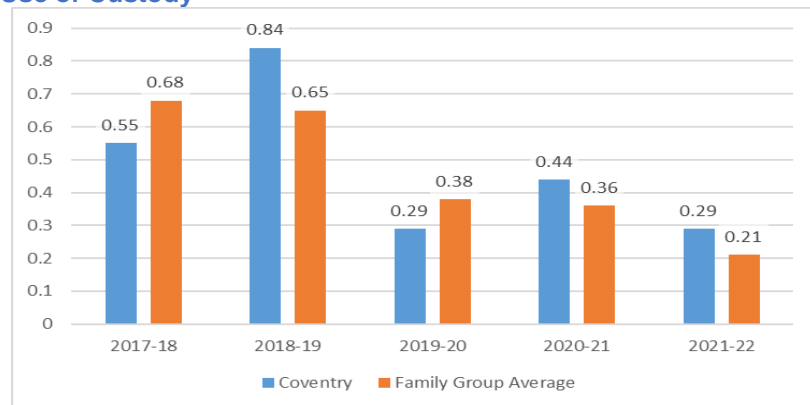


Table 3: Custodial sentences as a rate per 1,000 of the 10–17-year-old population, Coventry YJS 2017-2022

Use of Remand

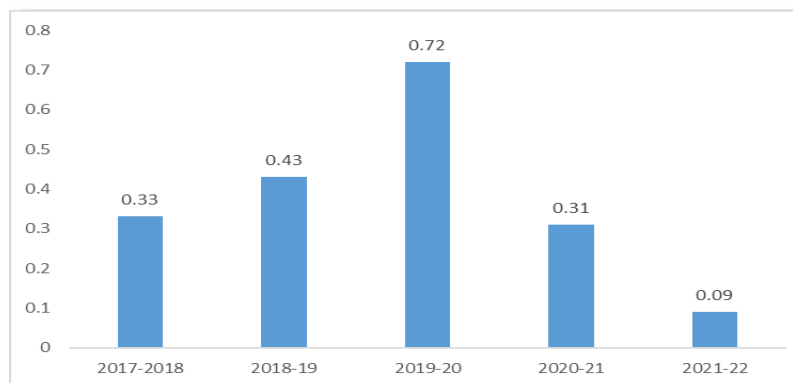


Table 4: New remand episodes per 1,000 of the 10–17-year-old population, Coventry YJS 2017-2022

Custody and Remand

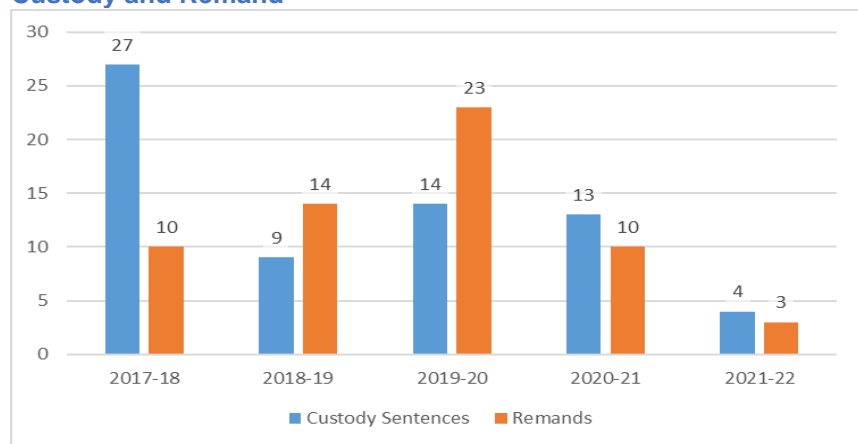


Table 5: New episodes of custody and remand, Coventry YJS 2017-22 (10-17 Year old's)

Accommodation

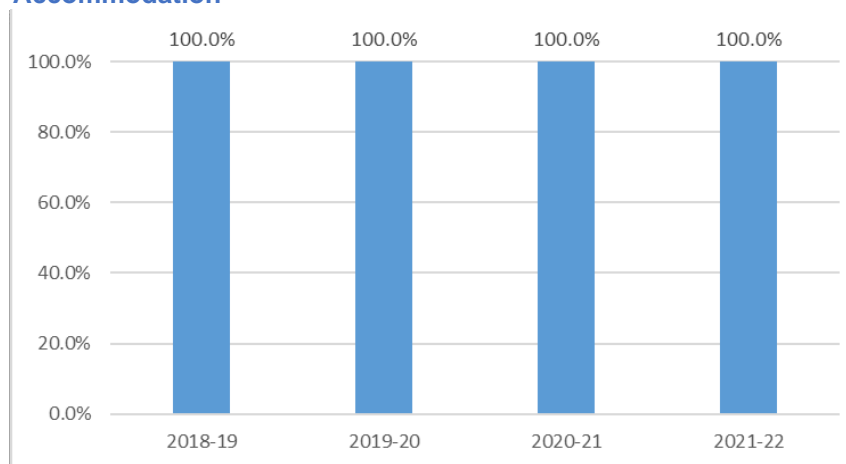


Table 6: Suitable accommodation, Coventry YJS 2018-22

Education, Training and Employment

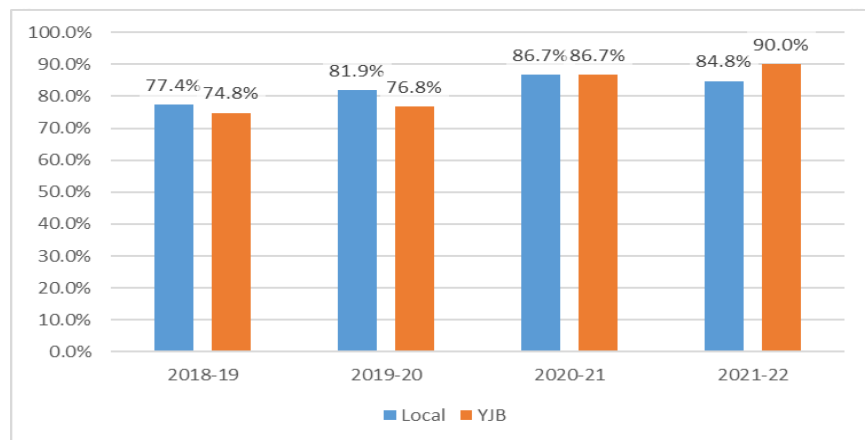


Table 7: Engagement in suitable ETE by local assessment and by the YJB national standard, 2018-22

Gender

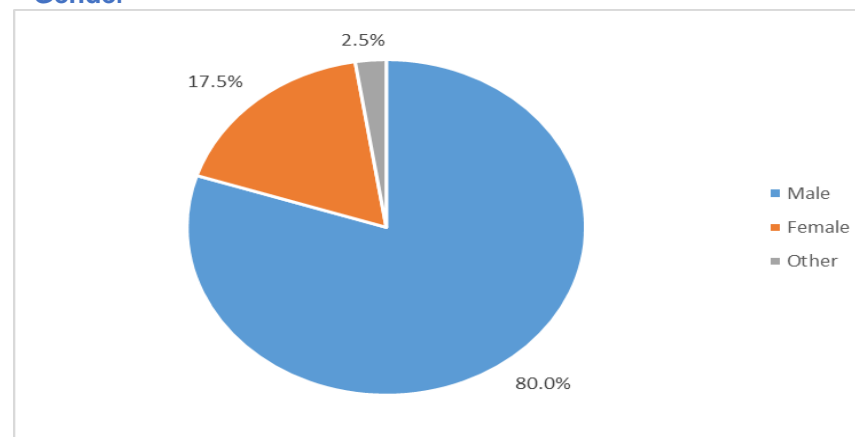


Table 8: Gender profile of children with proven offences, Coventry YJS 2021-22

Offences

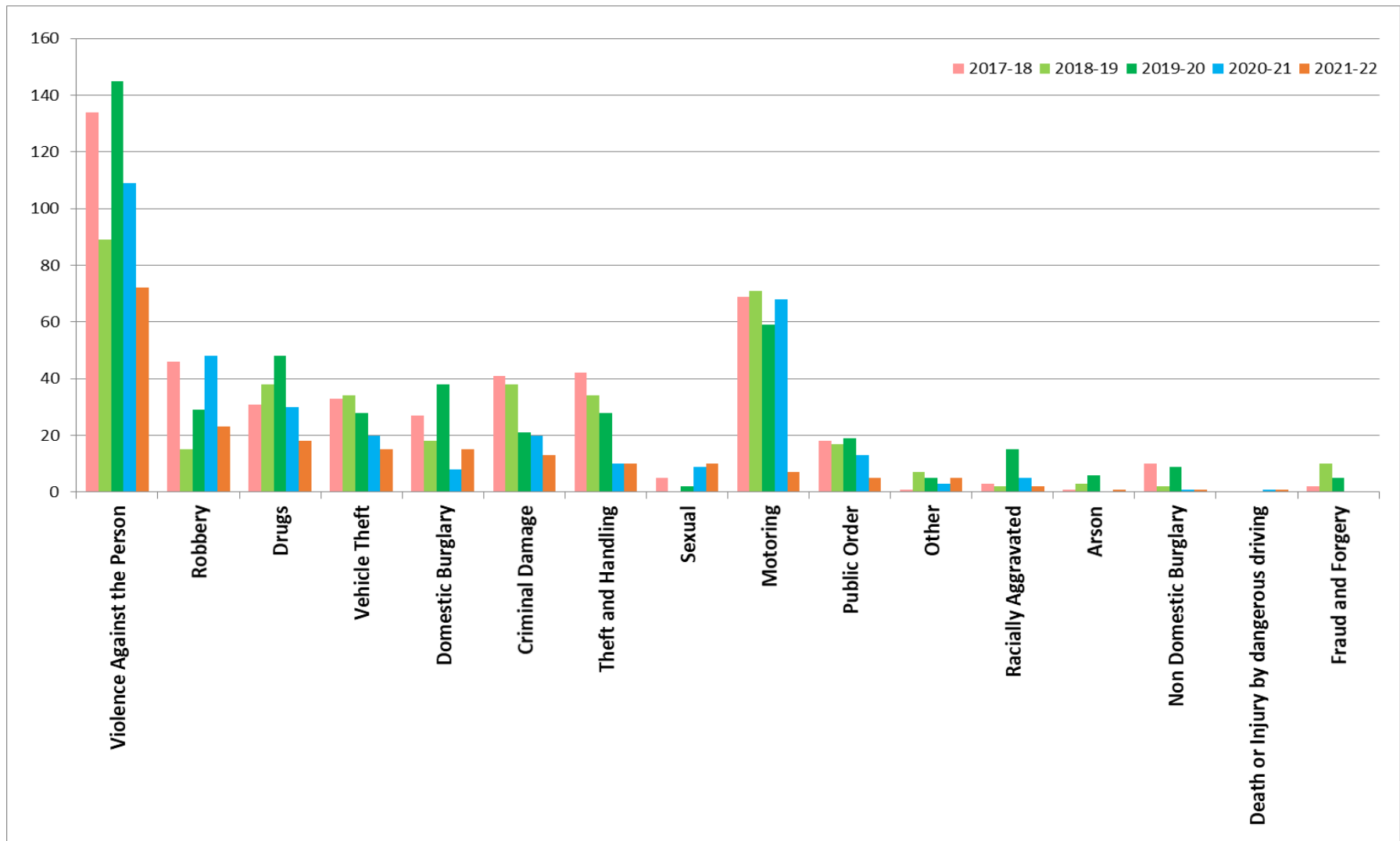


Table 9: Offences by offence type, Coventry YJS 2017-2022

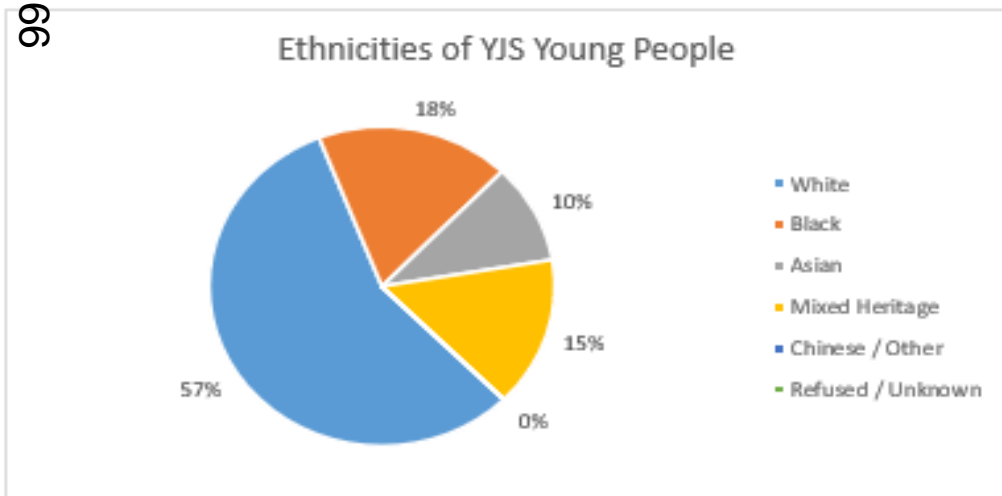


Table 10: Ethnic profile of young people with proven offences, open to Coventry YJS 31/03/2022

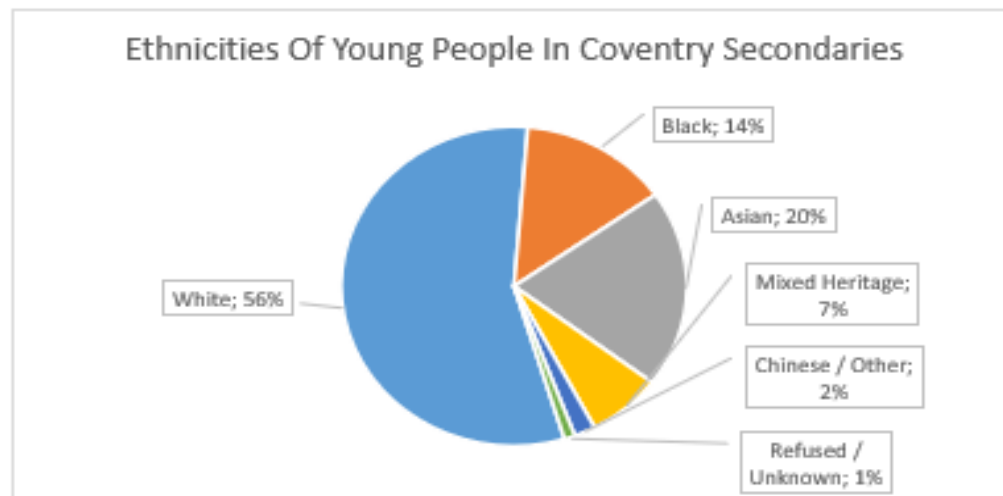


Table 11: Ethnic profile of young people in Coventry Secondaries

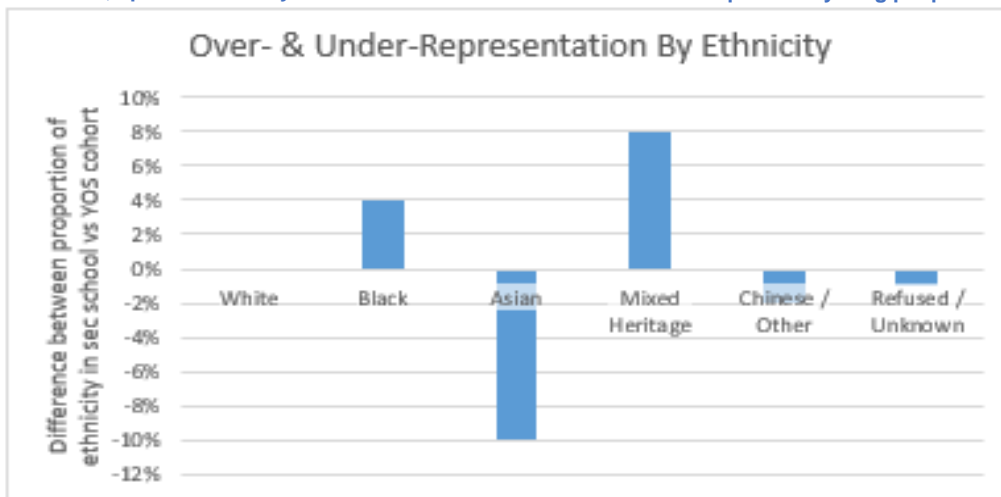


Table 12: Over and Under Representation by Ethnicity as per Table 10 and 11 data

Ethnicity

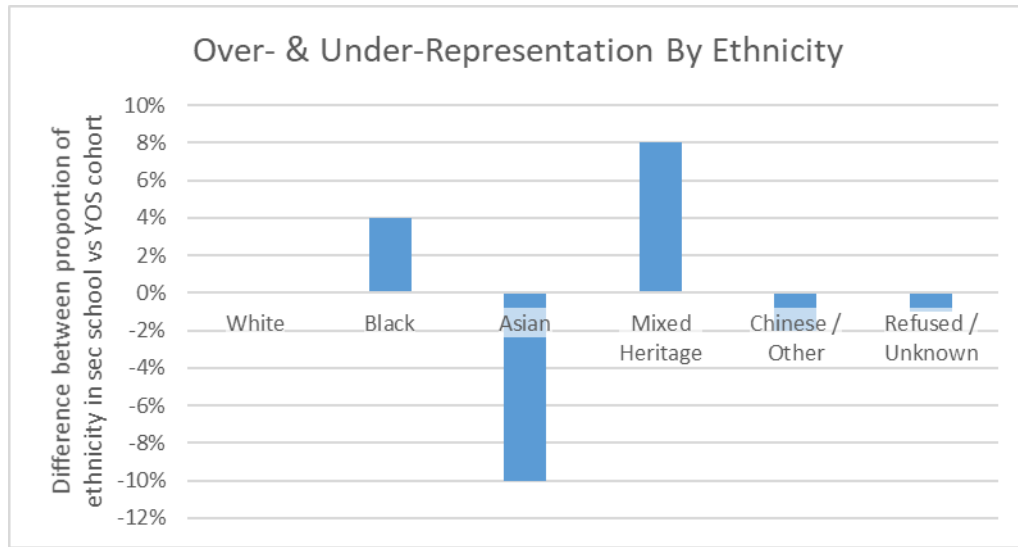


Table 13: Relative representation in custodial sentencing

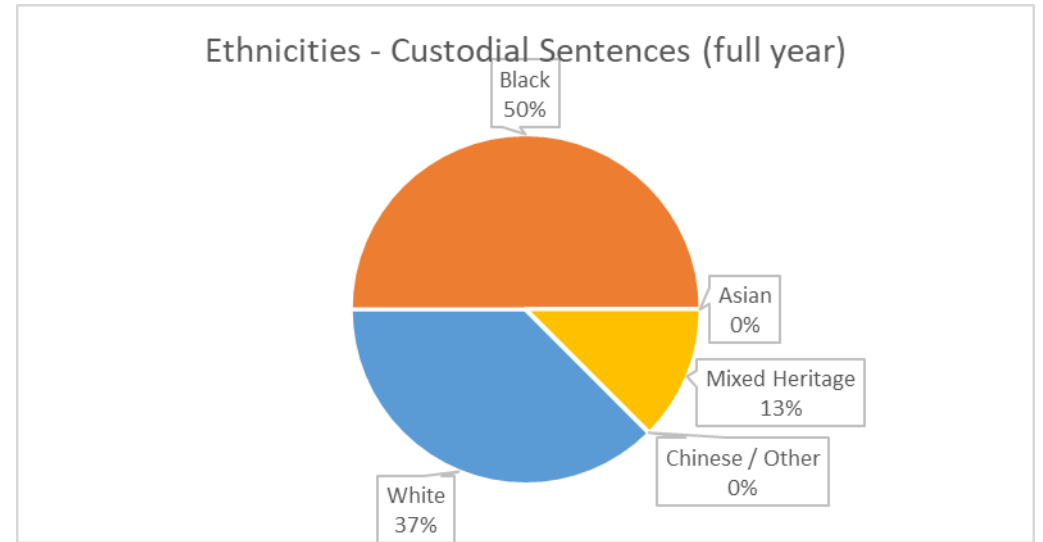


Table 14: Ethnicities of custodial sentences for children - 2021-22

Appendix 7 – Glossary of Terms and Abbreviations

ACE	Adverse childhood experience. Events in the child's life that can have negative, long lasting impact on the child's health, and life choices
AIM 2 and 3	Assessment, intervention and moving on, an assessment tool and framework for children who have instigated harmful sexual behaviour
ASB	Anti social behaviour
AssetPlus	Assessment tool to be used for children who have been involved in offending behaviour
CAMHS	Child and adolescent mental health services
CCE	Child Criminal exploitation, where a child is forced, through threats of violence, or manipulated to take part in criminal activity
Children	We define a child as anyone who has not yet reached their 18th birthday. This is in line with the United Nations Convention on the Rights of the Child and civil legislation in England and Wales. The fact that a child has reached 16 years of age, is living independently or is in further education, is a member of the armed forces, is in hospital or in custody in the secure estate, does not change their status or entitlements to services or protection.
Child First	A system wide approach to working with children in the youth justice system. There are four tenants to this approach, it should be: developmentally informed, strength based, promote participation, and encourage diversion
Child looked-after	Child Looked After, where a child is looked after by the local authority
CME	Child Missing Education
Constructive resettlement	The principle of encouraging and supporting a child's positive identity development from pro-offending to pro-social
Contextual safeguarding	An approach to safeguarding children which considers the wider community and peer influences on a child's safety
Community resolution	Community resolution, an informal disposal, administered by the police, for low level offending where there has been an admission of guilt
EHCP	Education and health care plan, a plan outlining the education, health and social care needs of a child with additional needs
ETE	Education, training or employment
EHE	Electively home educated, children who are formally recorded as being educated at

	home and do not attend school
EOTAS	Education other than at school, children who receive their education away from a mainstream school setting
FTE	First Time Entrant. A child who receives a statutory criminal justice outcome for the first time (youth caution, youth conditional caution, or court disposal)
HMIP	Her Majesty Inspectorate of Probation. An independent arms-length body who inspect Youth Justice services and probation services
HSB	Harmful sexual behaviour, developmentally inappropriate sexual behaviour by children, which is harmful to another child or adult, or themselves
JAC	Junior Attendance Centre
MAPPA	Multi agency public protection arrangements
MFH	Missing from Home
NRM	National Referral Mechanism. The national framework for identifying and referring potential victims of modern slavery in order to gain help to support and protect them
OOCD	Out-of-court disposal. All recorded disposals where a crime is recorded, an outcome delivered but the matter is not sent to court
Outcome 22/21	An informal disposal, available where the child does not admit the offence, but they undertake intervention to build strengths to minimise the possibility of further offending
Over-represented children	Appearing in higher numbers than the local or national average
RHI	Return home Interviews. These are interviews completed after a child has been reported missing
SLCN	Speech, Language and communication needs
STC	Secure training centre
SCH	Secure children's home
Young adult	We define a young adult as someone who is 18 or over. For example, when a young adult is transferring to the adult probation service.
YJS	Youth Justice Service. This is now the preferred title for services working with children in the youth justice system. This reflects the move to a child first approach
YOI	Young offender institution

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Scrutiny Coordination Committee
Cabinet

28 September 2022
11 October 2022

Name of Cabinet Member:

Cabinet Member for Jobs, Regeneration and Climate Change – Councillor J O’Boyle

Director Approving Submission of the report:

Director of Business, Investment and Culture

Ward(s) affected:

All

Title:

Coventry Economic Development Strategy 2022-2027

Is this a key decision?

Yes – as it is significant in terms of its effect on communities living or working in an area comprising two or more wards or electoral divisions in the area of the city

Executive Summary:

Coventry’s new Economic Development Strategy 2022-2027 will build on the achievements of the Coventry Economic Growth and Prosperity Strategy 2018-2022. It is one of the key strategies for delivering the objectives of the new One Coventry Plan 2022-2030, and also particularly strongly integrated with the new Coventry Skills Strategy.

As well as replacing the current Economic Growth and Prosperity Strategy, which expires at the end of 2022, a new Economic Development Strategy (“EDS”) is needed that provides a holistic framework for facilitating the sustainable growth of Coventry’s economy. This is vital as Coventry and the wider West Midlands region continues to recover from the recession generated by the Covid-19 pandemic, growing challenges around adjusting to new UK-EU trading regulations after Brexit and wider global supply chain disruption, inflation, and the cost of living and cost of doing business.

The new Economic Development Strategy will be integral to delivering the objectives of the 2022-2030 One Coventry Plan. It will be central to the objective of Increasing Economic Prosperity, by creating the conditions for local businesses to thrive, new investment to come into the city and the creation of new good quality job and training opportunities. Through providing the framework for sustainable economic development and enabling all residents to benefit from new employment and training opportunities created, the Strategy will also be key to tackling the causes of climate change and tackling inequalities. These actions will also cement the Council’s role as a partner, enabler and leader in shaping the local economy, and will help to improve the financial sustainability of the Council.

The vision of the Strategy is to “*deliver a strong and resilient economy, where inclusive growth is promoted and delivered, businesses are enabled to innovate and grow, and new local jobs are created.*” To achieve this vision, we will, through eight interlinked pillars:

- facilitate a sustainable economic recovery from the COVID-19 pandemic and challenging economic climate driven by inflation and rising cost of living and cost of doing business, creating the platform for longer-term growth and prosperity
- deliver a first-class support infrastructure that responds to our businesses’ needs and opportunities
- secure maximum public and private investment to deliver infrastructure projects that create the conditions for economic growth and job creation
- secure job creation, growth and prosperity through attracting and supporting business investment from both the UK and overseas
- ensure that social value and sustainability are incorporated into all economic development work
- support the development of a skills ecosystem which provides the skills required by Coventry’s businesses, both current and future, and contributes to economic growth and the prosperity of the city
- ensure Coventry is a leader in the green industrial revolution by supporting our businesses, residents and partner stakeholders to tackle the challenges and opportunities presented by climate change
- Build on existing strong partnerships in delivering all elements of this strategy

The Strategy will aim to tackle Coventry’s rising unemployment rate as well as wages and productivity levels which are below the national average, and the West Midlands economy experiencing the highest contraction of all regions during the Covid-19 pandemic. We will seek to capitalise on the unique opportunities facing the city – not least the city’s longstanding track record in transport innovation, opening of the UK Battery Industrialisation Centre in 2021, and plans for a Gigafactory at Coventry Airport and subsequent investment in the electric vehicle and battery technology supply chains; the legacies of UK City of Culture 2021 and the 2022 Commonwealth Games; and continued transformation of Coventry City Centre through the Friargate and City Centre South schemes and schemes delivering physical enhancements to neighbourhoods across the city.

In developing the Strategy, we have consulted directly with stakeholders across Coventry City Council, key external economic development and business support partners, and members of the public through the One Coventry Plan consultation process and consultation events.

Through continued work with our partners, by 2027 the strategy aims to ensure that Coventry is a:

- Green City, both through industrial innovation and sustainable transport.
- Leading edge city in Advanced Manufacturing & Engineering industries.
- Cultural City, particularly through expanded creative and tourism sectors.
- City providing high employment levels and good quality jobs.
- City providing opportunities for all through strong universities, and education & skills ecosystems.
- City with reduced health, economic and social inequalities.

As a result of the gradual withdrawal of EU structural funds between 2022 and 2024, the grant funding available to support the delivery of the EDS has also reduced requiring the use of one-off service reserves, which are now expired. Timing and value of successor grant funding from the Shared Prosperity Fund to support the EDS is still unclear but is expected to be less than previously available EU funds.

Recommendations:

Scrutiny Co-ordination Committee is recommended to:

- 1) Consider the content of the report and appendices
- 2) Identify any recommendations for Cabinet

The Cabinet is asked to:

- 1) Consider any recommendations or comments from Scrutiny Co-ordination Committee.
- 2) Approve the adoption of the Coventry Economic Development Strategy 2022-2027.
- 3) Delegate authority to the Director of Business, Investment & Culture following consultation with the Chief Legal Officer, the Chief Operating Officer and the Cabinet Member for Jobs Regeneration and Climate Change to further amend edit and adapt the Coventry Economic Development Strategy 2022-2027 in the future in response to subsequent review, opportunity and consultation as required.

List of Appendices included:

Appendix 1 - Coventry Economic Development Strategy 2022-2027

Appendix 2 - Equalities Impact Assessment

Background papers:

None

Other useful documents

West Midlands Combined Authority [Plan for Growth](#)

Has it been or will it be considered by Scrutiny?

Yes – Scrutiny Coordination Committee, 28th September 2022.

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

Coventry Economic Development Strategy 2022-2027

1. Context and Background

- 1.1 Coventry's new Economic Development Strategy 2022-2027 will build on the achievements of the Coventry Economic Growth and Prosperity Strategy 2018-2022. It is one of the key strategies for delivering the objectives of the new One Coventry Plan 2022-2030, and also particularly strongly integrated with the new Coventry Skills Strategy. Its purpose is to create the strategic framework for enabling the sustainable growth and development of Coventry's economy over a five-year period that will deliver significant benefits for the city's residents.
- 1.2 The Strategy has been produced at a crucial time. The Economic Growth & Prosperity Strategy expires at the end of 2022, and the city is responding to economic challenges presented by the recession caused by the Covid-19 pandemic, growing challenges around adjusting to new UK-EU trading regulations after Brexit and wider global supply chain disruption, and ongoing cost of living and cost of doing business challenges. The extent of these challenges, plus the scale and nature of new opportunities facing Coventry and the wider West Midlands economy, requires a new holistic framework that is fully integrated into other key Council Strategies and regional and sub-regional strategic frameworks.
- 1.3 In the 10 years after the 2008/09 recession, Coventry & Warwickshire was the fastest growing local economy in England (measured by economic output in Real GVA), and Coventry was the fastest growing UK city in terms of population. However, prior to the Covid-19 pandemic, economic growth slowed, with Coventry & Warwickshire recording the slowest growth of all local economies in 2018/19. During 2020, the West Midlands economy experienced the largest contraction of all UK regions, and Coventry's Claimant Count (numbers on unemployment-related benefits) almost doubled from 3% in January 2020 to 6.6% in December 2020 (the peak unemployment rate during the pandemic).
- 1.4 The West Midlands economy is expected to take longest of all English regions to return to pre-pandemic levels, and new Bank of England economic forecasts project a recession in the UK during Q4 2022 and throughout 2023.
- 1.5 Despite the challenging economic forecasts, there are major economic opportunities that Coventry is uniquely placed to capitalise on, and this strategy will create the necessary enabling framework. For example, there are major opportunities facing the electric vehicle and automotive supply chains, after the opening of UK Battery Industrialisation Centre in July 2021, and plans for a West Midlands Gigafactory at Coventry Airport and further investment in the business, innovation and skills support ecosystem. The delivery of strong legacies from UK City of Culture 2021 and the 2022 Commonwealth Games also presents significant opportunities for Coventry to secure investment (both international and domestic) across a wide range of sectors, including creative industries, tourism and professional services. The ongoing transformation of Coventry City Centre through Friargate and City Centre South, and investment in new forms of sustainable transport through Coventry Very Light Rail and All Electric Bus City will create further opportunities for new investment and provide more Coventry residents with access to good quality employment and training opportunities.
- 1.6 In response, the Strategy's Vision is to "*deliver a strong & resilient economy, where inclusive growth is promoted and delivered, businesses are enabled to innovate and grow, and new local jobs are created*". To achieve this vision, through eight interlinked pillars of delivery, we will:
 - Facilitate a sustainable economic recovery from the COVID-19 pandemic and challenging economic climate, driven by ongoing international trade and supply chain

disruption, inflation and the rising cost of living and cost of doing business, thereby creating the platform for longer-term growth and prosperity.

- Deliver a first-class support infrastructure that responds to our businesses' needs and opportunities.
- Secure maximum public and private investment to deliver infrastructure projects that create the conditions for economic growth and job creation across "Coventry.
- Secure job creation, growth and prosperity for Coventry through attracting and supporting business investment from both the UK and overseas.
- Ensure that social value and sustainability are incorporated into all of our Economic Development work.
- Support the development of a skills ecosystem which provides the skills required by Coventry's businesses, both current and future, and contributes to economic growth and the prosperity of the city.
- Ensure Coventry is a leader in the green industrial revolution by supporting our businesses, residents and partner stakeholders to tackle the challenges and opportunities presented by climate change.
- Build on existing strong partnerships in delivering all elements of this strategy.

1.7 In developing the Strategy, we have consulted directly with stakeholders within Coventry City Council, key external economic development and business support partners, and members of the public through the One Coventry Plan consultation process and "Strategy Carousel" events (over 100 stakeholders in total). This consultation exercise has been received positively and has enabled us to identify the key interventions that we are expected to deliver as part of the eight pillars within the five-year period, and, as such, secure buy-in and endorsement of the strategy. Through continued work with our partners, we aspire for Coventry to be, by 2027, a:

- Green City, both through industrial innovation and sustainable transport.
- Leading edge city in Advanced Manufacturing & Engineering industries.
- Cultural City, particularly through expanded creative and tourism sectors.
- City providing high employment levels and good quality jobs.
- City providing opportunities for all through strong universities, and education & skills ecosystems.
- City with reduced health, economic and social inequalities.

1.8 The new Economic Development Strategy will be one of the foremost strategies in delivering the objectives of the 2022-2030 One Coventry Plan. It will be central to the objective of Increasing Economic Prosperity, by creating the conditions for local businesses to thrive, new investment to come into the city and the creation of new good quality job and training opportunities. Through providing the framework for sustainable economic development and enabling residents across all neighbourhoods and social groups to benefit from new employment and training opportunities created, the Strategy will be key to delivering the objectives of Tackling the Causes of Climate Change and Tackling Inequalities. These actions will also cement the Council's role as a Partner, Enabler and Leader in shaping the local economy, and will help to Improve the Financial Sustainability of the Authority.

1.9 The success of the strategy will be measured through a set of relevant baseline and outcome indicators that are included in the One Coventry Plan, relating to business demography, wage levels and productivity, visitor levels, employment rates and skills levels. These are also set out within the strategy.

1.10 Partnership work will be integral to the roll-out and delivery of this strategy, involving many service areas across the Council, and through the Council working with key local regional and national level economic development and business support partners. The Economic Development Service will be responsible for overall co-ordination of the Strategy but will

collaborate particularly closely with the Employment & Skills Service in designing and delivering interventions, particularly those that will “Support All Coventry Residents to Access Jobs and Develop Skills”.

1.11 Our work with other sub-regional and regional partners will be critical to achieving the aspirations of this strategy. As well as working closely with our neighbouring Local Authorities, we will work collaboratively with the West Midlands Combined Authority (WMCA), given that the objectives of this strategy are closely aligned with the new West Midlands Plan for Growth. We will influence and work with partners to shape devolved policy that will make a real difference to the economic opportunities the people and businesses of Coventry have access to and will work with WMCA colleagues to bring external resources into Coventry. Building on our track record of securing external funding, we will also influence central Government through strong engagement with Department for Levelling Up, Housing & Communities; Department for Business, Energy & Industrial Strategy; Department for Culture, Media & Sport; Department for Work & Pensions; and other Government departments to ensure Coventry is at the forefront of new policy initiatives, pilot schemes and large scale funding opportunities.

1.12 This strategy will also aim to achieve the following:

- complement, support and influence Coventry City Council's wider strategies, policies and planning decisions, including any potential Local Plan review although it should be noted that in relation to planning decisions, this strategy will be treated as a material consideration but will have limited weight until the Local Plan review is completed; and
- raise current and future aspirations and opportunities on the national and international stage, due to its strategic importance.

1.13 As a result of the gradual withdrawal of EU structural funds between 2022 and 2024, the grant funding available to support the delivery of the EDS has also reduced requiring the use of one-off service reserves, which are now expired. Timing and value of successor grant funding from (primarily) the Shared Prosperity Fund to support the EDS is still unclear but is widely expected to be less than previously available EU funds.

1.14 It is imperative that CCC maintain its current level of provision in economic development activities, particularly in its business support programmes which are a key contributor to the Council's One Coventry Plan priority of creating economic prosperity. Businesses are currently facing unprecedented challenges including the huge rises in energy costs. Maintaining a similar activity and cost base will maintain a source of match funding which differentiates the Council from other business support providers which would seek 100% for their activities.

2 Options Considered and Recommended Proposal

2.1 Option 1

The Council can choose not to have an Economic Development Strategy, and to instead rely on strategic plans of the WMCA, such as the Plan for Growth. The risk with this approach is that it would most likely fail to deliver the necessary flexibility to focus on the priorities and types of interventions that are locally important to Coventry and specific neighbourhoods within the city. It would also reduce opportunities for focused interactions with key local stakeholders on the economy and how best to support local businesses and could hinder the ability of the city to secure new inward investment.

2.2 Option 2

The development of an Economic Development strategy that gives Coventry a new focus and voice in economic growth. It places Coventry businesses and people at the heart of the city's development, not least through attracting investment and new jobs, enhancing the competitiveness and resilience of existing businesses and jobs, upskilling the city's workforce and residents and improving the ability of local residents to access new employment opportunities and ability of local businesses to secure new supply opportunities. It will seek to align resources in this area to deliver the best possible economic outcomes for Coventry businesses and the city's residents.

2.3 It is recommended that the Cabinet supports Option 2 and endorses the Coventry Economic Development Strategy 2022-2027.

3 **Results of Consultation Undertaken**

3.1 Over 100 stakeholders were consulted to inform the focus and detail of the strategy. These included officers within the Authority, key local and regional economic development and business support partners, and members of the public through the One Coventry Plan consultation process (this included consultation with the public).

3.2 Stakeholder organisations consulted included:

- Coventry and Warwickshire Growth Hub
- Coventry and Warwickshire Chamber of Commerce
- Warwick University
- Coventry University
- Coventry and Warwickshire Reinvestment Trust
- Federation of Small Businesses
- Warwickshire County Council
- West Midlands Combined Authority

3.3 Through the consultation process which was positively received, we were able to determine the most important opportunities and threats facing Coventry's economy, the vision for what Coventry's economy should look like by 2027, and the most important areas of intervention required in response. We presented the strategy to the One Coventry Leadership Team in July 2022 to secure endorsement of all Council Directors.

3.4 It is also worth noting that the Council's Scrutiny Committee will be considering the Coventry Economic Development Strategy 2022-2027 on 28 September 2022.

4 **Timetable for Implementing This Decision**

4.1 The Coventry Economic Development Strategy 2022-2027 is a five-year strategy. Progress will be reported annually to the relevant Cabinet Member (Jobs, Regeneration & Climate Change) and to Cabinet.

5 **Comments from Chief Operating Officer (Section 151 Officer) and the Director of Law and Governance**

5.1 **Financial implications**

- 5.1.1 A proactive and innovative approach will be adopted to finance the delivery of the Coventry Economic Development Strategy 2022-27. This will entail building on existing core Council funding to secure external resources from a variety of sources. Coventry has a track record of securing more external grant funding than its neighbours, and the Economic Development Strategy plans to keep this record intact; however, with EU Structural Funds (historically one of the most important external funds for economic and social development) due to expire in 2023, and uncertainties over the scale, longevity and detailed focus of successor funds (including UK Shared Prosperity Fund), there will be a need to apply flexibility on how the delivery of the strategy is to be funded. The decline in EU funding in recent years has required the use of all one-off service reserves to maintain service levels however these will be fully utilised in the current financial year 22/23.
- 5.1.2 In a similar vein to previous sources of external funding, the ability to provide core funding as match funds will place Coventry in a stronger position to secure the external funds. Given uncertainties over the future of much external economic development funding, particularly beyond 2024/25 (when the current parliamentary term is due to end), the continuation of a consistent level of funding will also help ensure a degree of continuity in the scale and nature of support services the Council can provide to local businesses, inward investment services, and tracking of trends affecting business and the economy to ensure business support services are designed in a way that responds to key challenges and opportunities.
- 5.1.3 UK Shared Prosperity Fund (SPF) is expected to be less than previously received ERDF funding and this will become clearer once more details of the WMCA's commissioning framework are available, which is expected to happen towards the end of this financial year. Once the level of SPF is known, this will determine the level of available resources for the proposed strategy. No funding decision is required at this point.

5.2 Legal Implications

- 5.2.1 There are no direct legal implications arising out of this report at this stage, save for noting the Council's duty under the Equality Act 2010
- 5.2.2 Whilst there is no statutory duty to produce an Economic Development Strategy, doing so provides an important framework for helping to deliver the Council's statutory obligations and will help drive forward the One Coventry Plan 2022-2030. The Coventry Economic Development Strategy 2022 – 2027 will sit alongside other Council policies and strategies and will provide a clear and achievable economic vision therefore underpinning and reinforcing the Council's aims and objective for the City.
- 5.2.3 The Equality Act 2010 requires public authorities to have regard to the need to eliminate discrimination and advance equality of opportunity. The Council must further take into account its wider Public Sector Equality Duty (PSED) under s. 149 of the Equality Act 2010 when making its decisions. The public sector equality duty (s.49, Equality Act 2010) requires the Council when exercising its functions, to have 'due regard' to the need to eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Act, advance equality of opportunity between those who share a 'protected characteristic' and those who do not share the protected characteristic and foster good relations between persons who share a relevant protected characteristic and persons who do not share it (this involves having due regard, in particular, to the need to (a) tackle prejudice and (b) promote understanding). As such, Diversity, Equality and Inclusion has been identified as a cross-cutting theme within the strategy.

5.2.4 The Council will consider the impact of any projects or changes to service delivery that might arise as a result of implementing work coming out of this strategy on those protected equality characteristics. Individual proposals will be subject to an Equality Impact Assessment wherever relevant prior to any decision taken to proceed, including the identification of mitigating action, where possible.

6 Other implications

6.1 How will this contribute to the Council Plan (www.coventry.gov.uk/councilplan/)?

6.1.1 The Coventry Economic Development Strategy 2022-2027 will be one of the foremost strategies for delivering the One Coventry Plan and its five objectives.

6.1.2 **Increasing the Economic Prosperity of the City and Region.** This strategy will contribute heavily towards delivering this objective, not least because creating a strong and resilient economy underpins the Economic Development Strategy's objectives and key deliverables. The strategy will provide the strongest possible enabling framework for local businesses to prosper, (notably through providing the support ecosystem and infrastructure for businesses to invest in growth, diversification and innovation), for good quality jobs to be protected, for new domestic and international investment to come into Coventry, and for new good quality jobs and training opportunities to be created.

6.1.3 **Improving Outcomes and Tackling Inequalities Within our Communities.** Maximising social value is a cross-cutting theme throughout the strategy, and a key objective is to ensure that Coventry residents across all areas of the city and all social groups are able to benefit from good quality employment and training opportunities. It is also crucial that local businesses (particularly small and medium sized firms) are able to benefit from new supply opportunities. This will help to improve the standard of living of Coventry's residents and tackle longstanding inequalities.

6.1.4 **Tackle the Causes and Consequences of Climate Change.** One of the pillars within this strategy is to place Coventry as a leader in the green industrial revolution. One of the primary objectives is therefore to grow important "green" sectors of the economy (including electric vehicles, renewable energy and sustainable construction) and secure further inward investment into these sectors. Indeed, the Economic Development Strategy 2022-2027 will be fully integrated with the new Coventry Climate Change Strategy and supporting more Coventry businesses to understand and tackle the causes of climate change, and capitalising on opportunities presented by the circular economy are two further key objectives.

6.1.5 **Continued Financial Sustainability of the Council.** The strategy provides a framework that will enable businesses across a wide range of sectors to prosper and for local residents to improve their standard of living. All of this should help to support the financial sustainability of the Council by providing income generation opportunities, not least through business rates and Council tax revenues.

6.1.6 **Council's Role as a Partner, Leader and Enabler.** Partnership working is integral to the delivery of all elements of this strategy. As such, the Council will have a vital role to play in facilitating strong partnerships with other local economic development and business support organisations, and also acting as an important partner to regional and national organisations in delivering priority actions.

6.2 How is Risk Being Managed?

6.2.1 The Council has a strong track record of managing risks and maintaining significant financial controls and well-established procedures when handling public funds. The key risks associated with the strategy, and how they will be managed include:

- ***Economic uncertainty.*** With the Bank of England forecasting a recession for late 2022 and throughout 2023, the Council will need to act flexibly and be able to adapt projects and services to support businesses, and deliver the necessary infrastructure schemes, through both times of economic contraction and times of economic recovery and expansion.
- ***The changing public funding environment.*** With the UK no longer able to access EU Structural Funds beyond June 2023, the way many business, skills and employment support activities will be funded in Coventry and other areas of the UK will change. This could also entail changes in the quantum of funds, focus of the funds, and how the funding is administered. Coventry City Council is proactively responding to these changes through identifying more innovative ways of funding its priorities (including both through core and external funding sources), and further strengthening partnership approaches to delivery.
- ***Securing commitment of partners to work jointly on delivery of the strategy.*** Stakeholders both internal and external to the Council have responded very positively to the strategy, and we envisage that already strong partnership working arrangements will be enhanced in delivering the strategy.

6.3 What is the Impact on the Organisation?

6.3.1 HR Implications

The implications of this strategy in terms of funding the staff that will be directly responsible for delivering many of the activities, and facilitating successful partnership work, has been covered in Section 5.1. In respect of the wider Council, the Economic Development Strategy 2022-2027 will have wide reaching positive impacts on the residents of Coventry. These include improving health and wellbeing, targeting vulnerable groups and boosting local businesses and job creation. This should reduce reliance on other Council services (thereby mitigating against risks of the need to find extra financial resources for additional staff) and have public health benefits.

The staff impact within the strategy is positive. Any matters arising that impact staff as the strategy progresses will be dealt with in accordance with the appropriate policies that relate to specific matters arising.

6.3.2 Equality and Consultation Analysis (ECA)s

One of the key aspirations of the Economic Development Strategy is to have a positive impact on people who are identified as more vulnerable in terms of economic wellbeing and gaining sustainable employment. Initiatives, projects and programmes will be tailored to meet those vulnerable groups. Data is regularly collected and analysed to ensure continuous improvement and effective identification of the most vulnerable groups and

areas of the city. It should also be noted that Diversity, Equality and Inclusion is detailed as a cross-cutting theme within the strategy, underpinning all elements of strategy delivery.

In ensuring that Equality and Diversity is integrated into all elements of strategy design, we undertook a widespread consultation process to inform the content of the strategy, which included engagement with over 100 stakeholders across all Council Divisions, key local economic development and business support partners, and members of the public as part of the One Coventry Plan development process (including through the Strategy Carousel event).

Additionally, an Equalities Impact Assessment has been carried out in accordance with Council guidance.

6.3.3 Implications for (or impact on) Climate Change and the Environment

As detailed above, the strategy will have positive impacts on climate change and the environment and will be one of the most important strategies in achieving the One Coventry Plan's objective of "Tackling the Causes and Consequences of Climate Change". This strategy will also be strongly aligned with the new Coventry Climate Change Strategy.

Fundamentally, one of the Pillars of the strategy is to position Coventry as a leader in the Green Industrial Revolution. This will entail growing "green" sectors of the economy (e.g. low emission vehicles) and securing more inward investment (domestic and international) into these sectors, which will ultimately create new good quality "green" jobs and training opportunities. We will also deliver business support activities that will support small and medium sized firms in particular to better understand the causes of climate change and be able to tackle these (including through improved energy efficiency and adoption of renewable energy). The strategy also seeks to capitalise on opportunities presented by growing the circular economy. From an infrastructure standpoint, a core priority of the strategy is to ensure that new capital infrastructure schemes are designed in a way that protects the environment as much as possible (for example through creating sustainable drainage systems and protecting nature).

6.3.4 Implications for Partner Organisations?

The Strategy will be delivered in partnership with stakeholders across the city, sub-region and West Midlands region. It is a strategy that the Council cannot deliver on its own. Engagement with partners to align programmes, investments and collaboration on key projects and services will be required if we are to see its successful implementation. In many cases, it will involve the Council enhancing what are already strong partnerships.

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**COVENTRY ECONOMIC DEVELOPMENT STRATEGY 2022-
2027**

FRONT COVER

OUR VISION AND ASPIRATIONS

Foreword from Cllr Jim O Boyle, August 2022

The decade between 2010 and 2019 saw many successes for Coventry's economy. We saw a rejuvenation of our automotive sector, with the city at the forefront of the electric vehicle revolution, culminating in us securing the UK Battery Industrialisation Centre. We have also seen the city and region continue to be successful in securing new investment, notably Foreign Direct Investment. Securing UK City of Culture 2021 has also provided huge opportunities for boosting Coventry's profile to further position ourselves to attract new investment, as well as grow our creative, cultural and tourism sectors.

However, the COVID-19 pandemic, the rising challenges with inflation and the cost of living and cost of doing business, disruption to global supply chains, and new UK-EU trade regulations post-Brexit, have all presented many challenges to Coventry's economy and the city's businesses and residents. They have also caused longstanding inequalities between the richest and poorest in our society to grow. We are uniquely positioned to tackle these challenges, led by a strong legacy from UK City of Culture 2021 and the 2022 Commonwealth Games, the delivery of new development sites that provide unrivalled connectivity, and our world class innovation assets and education institutions. Building on the publication of our 10 strategic priorities on how we make [levelling up](#) a reality for Coventry, the publication of our new Economic Development Strategy for Coventry is very timely. It will create the framework to enable a local economy that delivers sustainable growth for the city and region, and crucially deliver an economy that residents across all our communities can benefit from.

The time has once again come to build on Coventry's longstanding tradition of innovation and reinventing itself, as we rise to the challenges of delivering a sustained economic recovery post-pandemic; delivering net zero and leading the way in the green industrial revolution; and ensuring that Coventry's residents and businesses can drive this through developing new skills and training opportunities in a way which systematically seeks to reduce inequalities right across our social gradient and addressing widening inequalities. We know and understand our communities; we work effectively with our businesses, third sector and other local public sector partners to deliver results, and we will once again work effectively with our partners to deliver necessary change that this Strategy is seeking to achieve.

Vision for this Economic Development Strategy

We will create a strong and resilient economy, where inclusive growth is promoted and delivered, businesses are enabled to innovate and grow and new local jobs are created.

To achieve this vision, we will:

- Facilitate a sustainable economic recovery from the COVID-19 pandemic and challenging economic climate driven by inflation, the rising cost of living and cost of doing business, and international trade and supply chain challenges. thereby creating the platform for longer-term growth and prosperity.
- Deliver a first class support infrastructure that responds to our businesses' needs and opportunities.
- Secure maximum public and private investment to deliver infrastructure projects that create the conditions for economic growth, job creation and that can "level up" Coventry's neighbourhoods.
- Secure job creation, growth and prosperity for Coventry through attracting and supporting business investment from both the UK and overseas.
- Ensure that social value and sustainability are incorporated into all of our Economic Development work.
- Support the development of a skills ecosystem which provides the skills required by Coventry's businesses, both current and future, and contributes to economic growth and the prosperity of the city.
- Ensure Coventry is a leader in the green industrial revolution by supporting our businesses, residents and partner stakeholders to tackle the challenges and opportunities presented by climate change.
- Build on existing strong partnerships in delivering all elements of this strategy.

We will measure progress made against the strategy objectives through the monitoring of the overall One Coventry Plan, and some of our key measurements of success include:

- Increase in Gross Domestic Product per head from £28,699, and reduce gap with national average.
- Increase in number of active businesses from 10,120 (or 330/10,000).
- Increase Coventry's employment rate from 71.2% (adding to the 161,000 jobs currently in the city).
- Reduce Coventry's unemployment rate from 5.5%, and reduce gap with national average.
- Increase median annual pay from £24,645 and reduce gap with national average.
- Increase in visitor trips from current level of 4.028m and pre-pandemic level of 10m.

OUR STORY

In the 10 years after the 2008/09 recession, Coventry & Warwickshire was the fastest-growing local economy in England, with economic output (measured in real GVA) growing by 33.4% between 2008/09 and 2016/17. This was driven significantly by major investments in Research & Development and production in the automotive sector and its supply chain, as well as continued expansion of the professional services sector and creative economy. Coventry had the fastest growing population of UK cities from 2009-2019 and its economic progress was exemplified by the award of UK City of Culture for 2021, being a host venue for the 2022 Commonwealth Games, and being part of the West Midlands 5G Test Bed – the first in the UK.

However, the local economy has encountered significant challenges in recent years. After growth of the Coventry & Warwickshire economy slowed to 1.24% growth (the lowest of all local economies) in 2018/19, the COVID-19 Pandemic had a severe impact on the economy, with the UK economy contracting by 9.9% in 2020 and the West Midlands estimated to have experienced the greatest contraction of all regions. This had a major impact on the local labour force, with the claimant count rising from 7,525 (3.0%) recorded in January 2020 to 16,490 (6.6%) in December 2020 (the peak during the pandemic). Longstanding inequalities across Coventry have been exacerbated, with 14.4% of neighbourhoods ranked in the most deprived 10% in England and life expectancy varying by 10.7 years for men and 8.3 years for women between the city's most affluent and most deprived neighbourhoods. The Council played an important role in helping to protect businesses and jobs, awarding over £80m in Government COVID-19 grants to over 4,500 Coventry businesses either mandated to close or adversely affected by public health restrictions, and ensuring that over 7,300 local businesses accessed over £300m in Government loans.

Further challenges have emerged in 2021 and 2022, with inflation (driven heavily by energy and component cost increases), labour shortages, and new regulations and document requirements for UK-EU trade post-Brexit all of which have slowed economic recovery, and the Bank of England's forecast of August 2022 projecting a recession for the UK during Q4 2022 and throughout 2023. It is therefore crucial that Coventry is able to deliver a strong and sustainable economic recovery from this challenging economic climate, and that foundations are put in place for longer-term economic prosperity. This includes building on the unique opportunities presented by the opening and roll-out of the £136m UK Battery Industrialisation Centre, maintaining Coventry's track record of leading edge innovation, the potential to secure a Gigafactory at Coventry Airport and subsequent investment in the electric vehicle and battery technology supply chains. There are also unique opportunities presented by the legacies of UK City of Culture 2021 and the 2022 Commonwealth Games, continuing the transformation of Coventry City Centre through the Friargate and City Centre South schemes, and the city's outstanding digital and transport connectivity. Through continued work with our partners, we aspire for Coventry in five years' time to be a:

- Green City, both through industrial innovation and sustainable transport
- Leading edge city in Advanced Manufacturing & Engineering industries
- Cultural City, particularly through expanded creative and tourism sectors
- City providing high employment levels and good quality jobs
- City providing opportunities for all through strong universities, and education & skills ecosystems
- City with reduced health, economic and social inequalities.

Alignment with Other Local Strategies

This Economic Development Strategy is one of the key strategies for delivering the One Coventry Plan's approach of enabling people to live their best lives in a vibrant and prosperous city. The actions within this strategy will be central to achieving the One Coventry Plan objective of "Increasing the Economic Prosperity of the City and Region". They will also contribute significantly to achieving the objectives of "Improving Outcomes and Tackling Inequalities in Communities" and "Tackling the Causes and Consequences of Climate Change". As such, this strategy is therefore closely aligned with many other strategies that feed into the One Coventry Plan, as well as feeding into the development of Coventry's Local Plan.



STRATEGIC PILLARS FOR DEVELOPING COVENTRY'S ECONOMY

We will achieve our objectives through 8 inter-related themes of activity, of which 4 are cross-cutting.

1. Delivering a Sustained Recovery from the COVID-19 Pandemic and Global Economic Challenges

The Covid-19 pandemic has delivered a seismic shock to the UK economy as many businesses were forced to close by the government throughout much of 2020 and the first half of 2021, or had their revenue generation capacity constrained. Businesses in Coventry were able to access significant support over this period in the form of c£100m of Covid grants and £300m of loans. This support proved to be a lifeline to many businesses, although it is notable that despite 13,000 new business registrations across Coventry & Warwickshire between Q2 2020 and Q3 2021, over 7,000 businesses failed.

As our economy continues to recover, many businesses have faced multiple economic challenges, including new trading regulations with the EU following Brexit (which also impacted on labour supply), disruption to global supply chains; and challenges created by inflation, and the rising costs of living and costs of doing business (with rises in energy prices and costs of materials particular challenges). Many businesses are still in the process of repaying Covid loans, and with the Bank of England forecasting a recession for late 2022 and 2023, we will need to show flexibility to continue supporting businesses to respond to these challenges. It is therefore vital that we provide the **necessary support ecosystem to enable businesses and jobs to be sustained and for businesses to be more competitive longer-term and grow and create jobs.**

In the short-term, we will continue to pro-actively communicate new areas of government support to protect businesses and jobs, and ensure those businesses and sectors that have been hardest hit by the pandemic and challenging economic conditions are in the best possible position to recover. However, to sustain the competitiveness of our business base, we will provide the ecosystem to stabilise the city's larger anchor firms, and will prioritise supporting the city's small and medium sized businesses to innovate and diversify. This will include adapting to changing market dynamics both domestically and internationally, including adjusting to new trading regulations between the UK and EU.

We will also prioritise maximising the scale of public funds we secure to sustain and enhance the services we are able to provide in providing support as often as needed to the widest number and range of businesses possible, and also in making the necessary capital investments that will drive business and jobs growth.

2. Providing a First Class Support Service for Local Businesses

In order to maximise levels of prosperity to Coventry's citizens, it is crucial that working alongside local business support, education and skills partners, we provide a strong support service that is responsive to the needs and opportunities faced by the city's 10,210 businesses, which currently support 161,000 jobs.

We will continue to create the ecosystem to enable the city's large anchor businesses to continue to thrive and create job and training opportunities; however, it is notable that 98% of Coventry's businesses are small or micro-businesses and it is vital that our support services are able to foster innovation and growth within these firms. We will build on the city's first class innovation and skills support assets, including through the universities, catapults and colleges, and strong partnerships between the Council and key business bodies. We will maximise public and private investment in enhancing our widely acclaimed business support services in the areas of start-ups, business growth, innovation, skills, and the low carbon economy.

An important priority is to support local Small & Medium Sized Enterprises (SMEs) to expand their markets and supply chain opportunities, including supplying public sector bodies, large businesses, or other SMEs – this may include supplying other economic sectors that they had not previously worked with. We will also support SMEs to innovate and diversify to safeguard longer-term competitiveness and protect jobs. A further priority will be to work with the Department for International Trade to increase awareness of exporting and expand the number of Coventry businesses that are accessing international market opportunities.

Other important areas of focus include:

- Building on Coventry's competitive advantage as a leader in **Advanced Manufacturing & Engineering**, not least through supporting investment in new technologies, products and major capital investments in the automotive, aerospace & energy generation sectors that will create new supply chain and market opportunities and ultimately the creation of high value jobs.
- Create a successful economic legacy from UK City of Culture 2021 by developing support activities that will boost the competitiveness of businesses in and suppliers to **creative sectors**, resulting in new jobs and training opportunities, and businesses diversifying to supply new emerging sub-sectors.
- Supporting the growth of other sectors creating good quality jobs in response to new ways of working and new market opportunities. These include **Professional Services**, building on the next stages of Friargate, **Education** on the back of the universities' expansions, and **Health & Life Sciences**.
- Support the growth of a vibrant **visitor economy** through strengthening Coventry's cultural and leisure offer, and **conference tourism** sector through Coventry being leading edge in innovation.

- Facilitating further investment in **5G & digital connectivity** and maximising take-up levels amongst businesses to further foster innovation and business competitiveness.
- Supporting the development and growth of **social enterprises** across a range of sectors, and boost their capacity to tackle social and environmental needs and provide training and job opportunities.

3. Creating the Infrastructure to Enable Sustainable Economic Growth

We will continue to secure maximum levels of public and private resource to finance and deliver vital infrastructure projects that will create the conditions for economic growth and job creation, and also “levelling up” Coventry’s neighbourhoods through maximising economic opportunities. Priorities include:

- Innovating with multi-use developments, including delivery of Friargate and City Centre South to support **Coventry to adapt to the new role of 21st century city centres**, reflecting the new work, leisure and retail patterns that have been accelerated by the Covid-19 pandemic. To “level up” Coventry, this will also involve enhancing the vitality of our suburban centres, including the Foleshill Road corridor.
- Realise **development of priority commercial sites that will enable the creation of good quality jobs**. These include the West Midlands Gigafactory at Coventry Airport that will strengthen the West Midlands Automotive sector and build on the opening of UK Battery Industrialisation Centre (UKBIC).
- Deliver **physical enhancements to Coventry’s culture and tourism assets** to increase footfall, dwell times and spend and further build the city’s reputation for hosting major national events and destination for leisure and tourism. Central to achieving this objective will be to complete the development of the Collections Centre as a focal point for arts and creative sectors, as well as realising the Arena Quarter Masterplan, which will be crucial to realising the economic potential of the North East of the city.
- Enable Coventry to be an attractive, cleaner and greener city, **building a sustainable transport infrastructure**, including pedestrian walkways, cycleways, green public transport and electric vehicle charging points. Central to this will be the delivery of All Electric Bus City and the roll out of the first Very Light Rail route, which will connect people in North Coventry with job opportunities at University Hospital Coventry & Warwickshire, the city centre and area around Warwick University and UKBIC.
- Develop **green spaces and improved streetscape** that support a wider range of communities to live and work across Coventry, promoting accessible spaces and increasing equality of access for all.
- Investing in the necessary **renewable energy infrastructure and power supply** to enable clean economic growth and innovation, and service new housing and commercial developments. This will include investing in solar farms and clean energy hubs.
- Build **new homes** to service Coventry’s population growth and service the economic growth.
- Continue to develop fast and reliable **broadband and 5G infrastructure** to ensure the city’s businesses and residents have access to leading-edge digital technologies and networks.

We will continue to maintain a live pipeline of aspirational projects and work closely with key sub-regional and regional partners, including West Midlands Combined Authority (WMCA), and relevant central government departments to ensure we are in the best possible position to secure the necessary funds to realise important projects, deliver against the **10 strategic priority areas for “Levelling Up Coventry”**, and ultimately deliver vital objectives of the One Coventry Plan and the Government’s Levelling Up White Paper.

We will also continue to work with capital and infrastructure projects that have been funded through the Local Growth Fund and Getting Building Fund up to 2025, to realise the outputs and impact of these projects, ensuring that Coventry will receive the full benefit of these funding programmes.

4. Securing UK and Foreign Investment to Support Jobs and Prosperity

Coventry is a city built on inward investment. For centuries, the city’s strengths in manufacturing and innovation have attracted international businesses and ambitious people. We will therefore seek to further build on our global reputation for welcoming creators, designers and makers to work alongside our homegrown talent to shape new industries and technologies, as well as attracting, retaining and growing new and better jobs that will drive the city’s future.

Our Inward Investment Strategy sets out our approach to securing job creation, growth and prosperity for Coventry through attracting and supporting business investment, with is a vital element of the city’s economic development. We will deliver these benefits through a multi-faceted approach designed to establish and promote opportunities in Coventry to businesses and markets regionally, nationally and globally. Our key priorities for securing UK and Foreign Investment include:

- **Product Development** - developing and promoting the key Coventry offer to inward investors to drive competitiveness in an ever-changing marketplace.
- **Business Retention & Expansion** - to safeguard, support and grow the business base and seek to identify potential opportunities for securing further investment from existing businesses.
- **Investor Targeting** - pursuing target businesses, projects and opportunities that deliver more jobs, companies and investment for local people.

- **Capital Investment** - promoting opportunities to attract the investment that will unlock new developments in the city or bring forward key infrastructure projects.
- **Talent Development, Attraction & Retention** - promoting the city's fantastic talent nurturing assets (not least the city's universities, colleges and schools) and ensuring that Coventry is a place that works for businesses wanting a physical presence as well as a workforce that chooses to work from home, or in hybrid ways.
- **Partnership Leverage** - working closely with partners at the local, regional and national levels. Coventry will play an active role in supporting partnerships to achieve greater reach in order to deliver greater investment.
- **Place Promotion** - targeted place promotion to create engagement and deliver investment. We will be promoting the city's key target sectors which include, but are not limited to Mobility (automotive, aerospace and rail); Energy (renewables, battery technologies and storage); Creative & ICT (software, design, games, e-sports, digital infrastructure), Business Professional & Financial Services (headquarters, consulting & sales); and Retail & Leisure. This will also include realising the potential of key physical assets in the City Centre to secure aspirational investment (to include Friargate and City Centre South) as well as capitalising on the Gigafactory initiative and the established UKBIC investment to deliver a battery manufacturing supply chain and associated investment.

CROSS CUTTING THEMES

5. Achieving Social Value & Sustainability in all Facets of Economic Development

The Council is committed to engaging with social value across the whole organisation, in line with the UN Sustainable Development Goals, and embedding it in all threads of our activity. Social value is already well established in our work with developers on construction projects and in procurement but it needs to be developed across other elements of Economic Development across the Council and our partners. Growing our social value offer is ambitious but maximises the opportunity for local people and communities in the city. Working with internal and external stakeholders we will encourage social responsibility within procurement, development, and key services such as Education and Public Health and ensure the benefits of this are being realised well into the future within the city.

We will continue to raise awareness of social value, promote the social value taking place, encourage collaboration, improve understanding, and empower local people and communities. In line with our Social Value & Sustainability Policy, we will achieve this by working in a One Coventry approach Council-wide.

Key actions we will take to ensure social value is a key thread across all our work include:

- **Continue our already successful work with key development sites in the city**, notably through working with developers to promote contracting opportunities for local businesses, as well as employment, apprenticeship and training opportunities for local residents.
- **Signposting businesses we are supporting to the Social Value Forum** to maximise awareness of how engaging in social value principles can significantly benefit themselves and the wider economy.
- **Strengthening support to enable local SMEs to access more procurement opportunities**, particular from public bodies and major publicly funded projects in Coventry and beyond. This is in the form of both business advice and making stronger use of e-portals such as Find it in CW.
- **Developing a stronger circular economy in Coventry**. Initial steps will include working with the city's universities on use/reuse of materials, further developing the Coventry Food Network, continuing to roll out the City of Culture 2021 Green Code for the arts and cultural sectors as part of the future legacy, and creating the ecosystem for social enterprises that focus on waste minimisation to grow – all of this has potential to create significant employment and training opportunities for disadvantaged groups.
- **Ensuring we are recording and communicating where we're achieving social value**. This will entail further developing our new internal recording function.
- **Developing a directional approach that is broader, embedded and concrete**, ensuring that CCC staff and partner stakeholders are engaged and making social value a core priority.

6. Support All Coventry Residents to Access Jobs and Develop Skills

Together with partners, we will ensure that local people benefit from new employment and training opportunities are created through future economic recovery and growth. This will help support education and skills issues that restrict the labour market progression of both people in work and the unemployed (7.1% of Coventry's working age population have no qualifications compared to 6.4% nationally). Any failure to match the local workforce's skills to employer's needs risks harming the economic recovery of key sectors, and we will continue to support local businesses to tackle challenges with recruitment and labour supply, engaging Unions and Trade Bodies in the process to create attractive terms and conditions and promote career progression paths (where appropriate). Moreover, those without work or low paid are vulnerable to poorer health and life expectancy, and we will work with businesses to tackle longstanding health inequalities, through increasing investment in skills and apprenticeships, implementation of fairer working practices and paying more staff the real living wage, engaging Trade Bodies and Unions in the process.

We will therefore prioritise the upskilling and reskilling of the local workforce and ensuring local people access new jobs emerging. This strategy is fully integrated with the new Coventry Skills Strategy, not least its objective of *"Skills for business: A skills system which provides the skills required by Coventry's businesses, both current and future and contributes to economic growth and the prosperity of the city"*.

Through our Skills Strategy and Economic Development Strategy, we will achieve three things together:

- **Getting the Skills and Opportunities Right for Investment:** Develop a 'team around' approach for investments and large developments with expertise brought together from across the Council to ensure early, comprehensive planning better meets business need and ensures maximum benefit for Coventry. This is particularly key for emerging sectors, such as smart mobility, vehicle electrification, green energy/renewables, ICT and e-sports.
- **Co-designing Skills Solutions with Businesses:** designing together with industry and skills partners to ensure the skills system is responsive, innovative and produces the right skills mix for now and the future. This includes supporting employers to maximise social value commitments.
- **In-work Upskilling with Local Employers:** collaborations which encourage access to skills and workplace development at all levels.

We aim to achieve economic growth in Coventry that is inclusive and accessible to all communities across the city, including creating the right environment for more inclusive employment opportunities to flourish. We will continue to deliver tailored support to local businesses to upskill and reskill their workforce and create new opportunities for enhancing growth and productivity, whilst also promoting progression in the workplace. We will also continue to facilitate the transfer of CCC Apprenticeship Levy monies to local SMEs, and thereby support the creation of new Apprenticeship opportunities for local residents across all sectors of the local economy. We will also work with local businesses and training providers to enable the unemployed to acquire new skills and qualifications that will enable them to progress into employment.

We will also continue work alongside both Coventry University and University of Warwick, as important economic drivers within the city. They are economic assets in their own right, employing c11,000 people, and also have over 66,000 undergraduate and postgraduate students, which are key potential assets to the city's businesses. We will continue to work with the city's businesses to create the conditions to deliver high value employment opportunities and to retain more graduates in the city than the 15% last recorded in 2015.

7. Coventry as a Leader in the Green Industrial Revolution

To become a leader in the race to net zero, we will work with Coventry's businesses and industry leaders to lower emissions and ensure green innovation is driving Coventry's economic growth. We have played a leading role in green economic development and green innovation for many years, with Coventry's previous Climate Change Strategy (one of first of its type in the UK) achieving its target of reducing Carbon emissions by 27.5% five years early. Coventry's strong history of innovation and first-class support ecosystem means the city is well placed to lead the way in delivering a "Green Industrial Revolution", given that it produces the fourth highest number of patents per head of all major UK cities (75.6 per 100k population).

However, there is further work for the Authority to do, working with public and private sector partners to ensure industry can meet the challenge and position Coventry as a leader and flagship city for net zero and sustainability. Through this strategy and our new Climate Change Strategy, we will support Coventry businesses and other economic stakeholders to drive green innovation through:

- **Helping business and industry to understand the challenge and need to act and providing access to relevant support** – for example, just 36% of small businesses nationally currently have a plan to combat climate change and 69% not knowing how to measure their carbon footprint.
- **Seeking opportunities to develop jobs, skills, growth and innovation in industries which address the net zero and circular economy challenge**, such as building energy efficiency retrofit solutions or installation of low carbon heating technologies.
- **Mobilising opportunities in the energy sector to secure low carbon and renewable supply**, both in terms of servicing local businesses and residents and potential new investors to Coventry.
- **Enhancing our support offer to enable local businesses to improve energy efficiency, adoption of renewable energy sources and develop new innovative low carbon products and services**, by building on Coventry & Warwickshire Green Business Programme and our Business Sustain service.
- **Ensuring that our inward investment offering highlights our net zero activity to potential investors.** Specifically, we will seek to attract investment from businesses with their own ambitions to deliver net zero.
- **Working on circular economy opportunities that minimise waste across all sectors of the economy and support social enterprise.** We will seek solutions that address both food and fuel poverty, creating jobs and community activity.
- **Ensure Coventry's future Local Plans do not worsen the causes and impacts of climate change**, including not building on flood plains and conserving natural ecosystems.

8. Building on Successful Partnerships

In delivering all actions within this strategy and achieving positive outcomes for Coventry's businesses and residents, we will collaborate closely with key local partners operating in the economic and social development landscape and further strengthen existing working relationships. This will include (but not limited to) local business support and membership bodies (e.g. Coventry & Warwickshire Chamber of Commerce and Federation of Small Businesses), the universities in Coventry and wider West Midlands region, Further Education Institutes, specialist skills providers, Unions and Trade Bodies, and finance providers. We will also continue to apply a collaborative approach with the WMCA and UK Government. These relationships will play an important role not only in ongoing service delivery but on enhancing our understanding of the key needs and opportunities facing Coventry's businesses and residents on an ongoing basis and in informing how we design and deliver our services to enable us to realise these ambitions.

Diversity, Equality and Inclusion (DEI)

DEI is a core value that will underpin all aspects of delivering this strategy. From the materials used, the services leveraged through to the organisations engaged and attracted, DEI is a non-negotiable principle that will ensure all activities are delivered fair and responsibly. Together with our partners, we will safeguard and enhance the competitiveness of the city's businesses and create employment and associated opportunities without discrimination that will benefit all aspects of our diverse city.

BASELINE AND OUTCOME INDICATORS

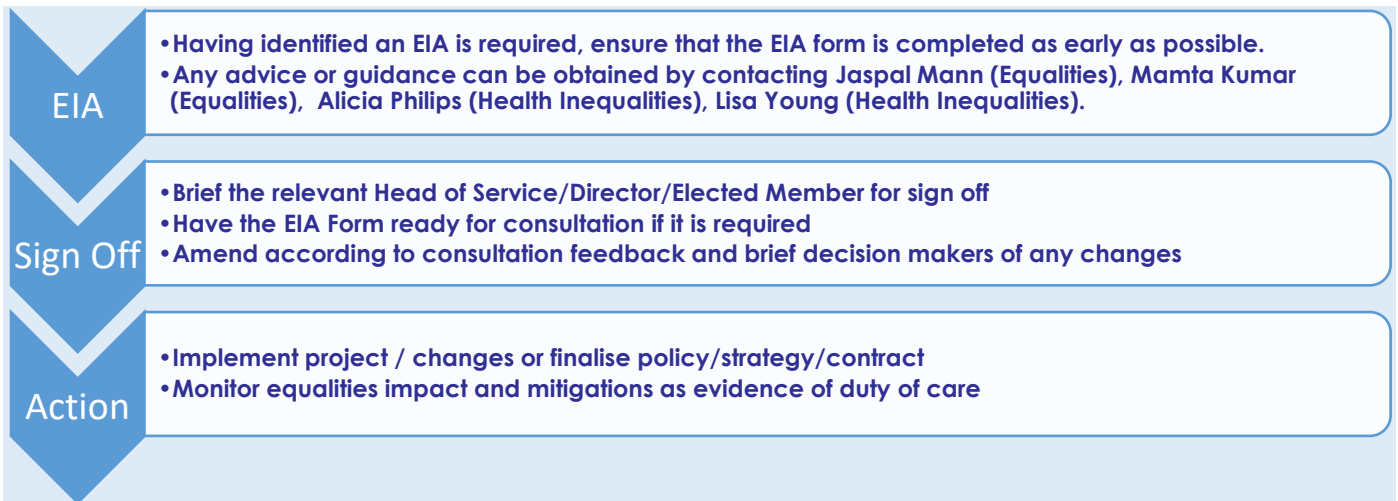
This section summarises indicators used in the One Coventry Plan 2022-2030, where the Council shows progress made towards its priorities that are most relevant to economic development. Through working with our partners, we summarise the improvements we intend to make from baseline positions during the strategy implementation period. Through the One Coventry Plan monitoring process, we will track the performance of the city's economy against these indicators.

Indicator	Previous	Current	Comparators	Progress	Target	Status
Regional gross domestic product (pound per head)	£30,168 (2019 revised)	£28,699 (2020 provisional)	West Midlands Region £26,281 (2020 provisional), England £32,866 (2020 provisional)		To increase	
City centre footfall (year-on-year % change)	-63.0% (2020/21 revised)	+94.7% (2021/22)	UK Index +59.5% (2021/22)		To increase	
Visitor trips	10,030,000 (2019)	4,028,000 (2020)	N/A (No data), England N/A (No data)		To increase	
Resident employment rate	71.2% (Jan-Dec 2020 revised)	71.2% (Jan-Dec 2021)	West Midlands Region 73.6% (Jan-Dec 2021), England 75.1% (Jan-Dec 2021)		To increase	
Unemployment (model-based)	5.9% (Jan-Dec 2020)	5.5% (Jan-Dec 2021)	West Midlands Region 5.0% (Jan-Dec 2021), England 4.5% (Jan-Dec 2021)		To decrease	
16-17-year-olds not in education, employment, or training (NEET) including not knowns	5.0% (NEET 3.0%, Not known 2.0%) (2020)	4.4% (NEET 2.3 %, Not known 2.1%) (2021)	West Midlands Region 5.7% (NEET 2.6%, Not Known 3.1%) (2021), England 5.5% (NEET 2.8%, Not Known 2.7%) (2021)		Below (better than) national average	
Median annual pay (all employee types) of residents	£24,645 (2020 revised) – not adjusted for inflation	£25,795 (2021 provisional) – not adjusted for inflation	West Midlands Region £25,000 (2021 provisional), England £26,192 (2021 provisional) – not adjusted for inflation		To increase	
Gross disposable household income per head	£15,225 (2018)	£15,350 (2019 provisional)	West Midlands Region 18,350 (2019 provisional), England £21,978 (2019 provisional)		To increase	
Apprenticeship levy transferred to support non-levy paying firms in Coventry	£74,734 (2020/21 transferred)	£97,976 (2021/22 transferred) £364,617 total pledge to end 2021/22	N/A		To increase	
Residents qualified to level 4 or above (working age population)	39% (Jan-Dec 2020 revised)	40% (Jan-Dec 2021)	West Midlands Region 39% (Jan - Dec 2021), England 43% (Jan-Dec 2021)		To increase	
Active enterprises (number and rate per 10,000)	330 (10,120) (2020 revised)	333 (10,120) (2021)	WMCA 394, Warwickshire 581, 2021		To increase	
Investment income secured	£1.1m (2020/21)	£2.2m 2021/22	N/A		To increase	
Business rates tax base (change from 2002 base)	138.70 (2019/20)	137.83 (2020/21)	WMCA 124.98 (2020/21),		To increase	

EQUALITY IMPACT ASSESSMENT (EIA)



Title of EIA		Economic Development Strategy 2022-2027
EIA Author	Name	David Hope
	Position	Business Development Manager
	Date of completion	6/9/2022
Head of Service	Name	Steve Weir
	Position	Head of Economic Development
Cabinet Member	Name	CLlr Jim O Boyle
	Portfolio	Jobs, Regeneration and Climate Change



PLEASE REFER TO [EIA GUIDANCE](#) FOR ADVICE ON COMPLETING THIS FORM

SECTION 1 – Context & Background

1.1 Please tick one of the following options:

This EIA is being carried out on:

- New policy / strategy**
- New service
- Review of policy / strategy
- Review of service
- Commissioning
- Other project (*please give details*)

EQUALITY IMPACT ASSESSMENT (EIA)



1.2 In summary, what is the background to this EIA?

This is an Equality Impact Assessment of the new Coventry Economic Development Strategy 2022-2027. This is primarily to ensure that the strategy, and more detailed interventions that are developed after rolling it out, eliminate unlawful discrimination, harassment and victimisation; advances equality of opportunity between different groups; and fosters good relations between different groups.

1.3 Who are the main stakeholders involved? Who will be affected?

The strategy and its roll out will affect and involve a wide range of stakeholders and partners. Although its implementation will be co-ordinated by CCC's Economic Development Service, it will involve and affect multiple Service Areas across the Council. The other key stakeholders that the strategy and its roll out will impact on include Coventry businesses, as well as Business Representative Bodies and business support organisations who will need to deliver interventions as part of the Strategy's roll-out. In light of this, the aforementioned stakeholders have all been consulted to agree the Strategy's priorities and key areas of focus.

Coventry residents will also be affected by the strategy, in that it will provide the framework for creating new good quality employment and training opportunities, both for residents not in employment and residents employed by Coventry businesses and seeking career progression, new skills and potentially increased wages. Again, we have consulted with the public in shaping the Strategy's priorities and focus, as part of the One Coventry Plan consultation process.

1.4 Who will be responsible for implementing the findings of this EIA?

Although Coventry City Council's Economic Development Service will be responsible for co-ordination and monitoring of the roll-out and implementation of this Strategy, the delivery of all interventions will entail partnership work with local, regional and national Economic Development partners. As such, all of these organisations will need to take responsibility for implementing the findings of this EIA.

SECTION 2 – Consideration of Impact

Refer to guidance note for more detailed advice on completing this section.

In order to ensure that we do not discriminate in the way our activities are designed, developed and delivered, we must look at our duty to:

- Eliminate discrimination, harassment, victimisation and any other conflict that is prohibited by the Equality Act 2010
- Advance equality of opportunity between two persons who share a relevant protected characteristic and those who do not

EQUALITY IMPACT ASSESSMENT (EIA)



- Foster good relations between persons who share a relevant protected characteristic and those who do not

2.1 Baseline data and information

Please include a summary of data analysis below, using both your own service level management information and also drawing comparisons with local data where necessary (go to

<https://www.coventry.gov.uk/factsaboutcoventry>)

The local economy has encountered significant challenges in recent years, after having the highest growth rates in the UK between 2008/09 and 2016/17. After growth of the Coventry & Warwickshire economy slowed to 1.24% growth (the lowest of all local economies) in 2018/19, the COVID-19 Pandemic had a severe impact on the economy, with the UK economy contracting by 9.9% in 2020 and the West Midlands estimated to have experienced the greatest contraction of all regions. This had a major impact on the local labour force, with the claimant count rising from 7,525 (3.0%) recorded in January 2020 to 16,490 (6.6%) in December 2020 (the peak during the pandemic). The most recent Claimant Count from July 2022 shows that Coventry's unemployment rate of 4.6% exceeds the national average of 3.7%. When examining age breakdowns, although Coventry's youth unemployment rate (under 25s) is below the national average, the unemployment rates for those aged 25-49 and over 50 exceed the national average.

The Strategy identifies other areas of underperformance in the local economy against national averages that need addressing. As a measure productivity, GDP per head in Coventry (£28,699) is lower than the national average of £32,866. As an indicator of the standard of living, the median annual wage in Coventry (£25,795) is also lower than the national average of £26,192.

Longstanding inequalities across Coventry have been exacerbated, with 14.4% of neighbourhoods ranked in the most deprived 10% in England and life expectancy varying by 10.7 years for men and 8.3 years for women between the city's most affluent and most deprived neighbourhoods.

2.2 On the basis of evidence, complete the table below to show what the potential impact is for each of the protected groups.

- Positive impact (P),
- Negative impact (N)
- Both positive and negative impacts (PN)
- No impact (NI)
- Insufficient data (ID)

Any impact on the Council workforce should be included under question 2.6 – **not below*

EQUALITY IMPACT ASSESSMENT (EIA)



Protected Characteristic	Impact type P, N, PN, NI	Nature of impact and any mitigations required
Age 0-18	P	The interventions that will be delivered through the implementation of this strategy will lead to the creation of new good quality employment and training opportunities that would increase aspirations for young people in Coventry and would provide them with strong future career pathways.
Age 19-64	P	The interventions will be delivered through the implementation of this strategy will lead to the delivery of business support activities that will benefit entrepreneurs, business managers and employees within this demographic, and further activities that will lead to the protection and creation of good quality employment and training opportunities that would improve labour market prospects and most likely the standard of living amongst residents within these groups.
Age 65+	P	The interventions will be delivered through the implementation of this strategy will lead to the delivery of business support activities that will benefit entrepreneurs, business managers and employees within this demographic, and further activities that will lead to the protection and creation of good quality employment and training opportunities that would improve labour market prospects and most likely the standard of living amongst residents within these groups.
Disability	P	The interventions will be delivered through the implementation of this strategy will lead to the delivery of business support activities that will be accessible to and benefit disabled entrepreneurs, business managers and employees, and further activities that will lead to the protection and creation of good quality employment and training opportunities that would improve labour market prospects and most likely the standard of living for Coventry's disabled residents.
Gender reassignment	P	The interventions will be delivered through the implementation of this strategy will lead to the delivery of business support activities that will be accessible to and benefit entrepreneurs, business managers and employees within this group, and further activities that will lead to the protection and creation of good quality employment and training opportunities that would be accessible to Coventry residents within this group, and would improve labour market prospects and most likely the standard of living.
Marriage and Civil Partnership	P	The interventions will be delivered through the implementation of this strategy will lead to the delivery of business support activities that will be accessible to and benefit entrepreneurs, business managers and employees of all types of marriage/civil partnership

EQUALITY IMPACT ASSESSMENT (EIA)



		characteristics, and further activities that will lead to the protection and creation of good quality employment and training opportunities that would be accessible to all Coventry residents, and would improve labour market prospects and most likely the standard of living.
Pregnancy and maternity	P	The interventions will be delivered through the implementation of this strategy will lead to the delivery of business support activities that will be accessible to and benefit entrepreneurs, business managers and employees that fall within this group, and further activities that will lead to the protection and creation of good quality employment and training opportunities that would be accessible to all Coventry residents, and would improve labour market prospects and most likely the standard of living.
Race (Including: colour, nationality, citizenship ethnic or national origins)	P	The interventions will be delivered through the implementation of this strategy will lead to the delivery of business support activities that will be tailored in a way that will be accessible to and benefit entrepreneurs, business managers and employees of all types of racial/ethnic groups, and further activities that will lead to the protection and creation of good quality employment and training opportunities that would be accessible to Coventry residents of all ethnic groups, and would improve labour market prospects and most likely the standard of living.
Religion and belief	P	The interventions will be delivered through the implementation of this strategy will lead to the delivery of business support activities that will be tailored in a way that will be accessible to and benefit entrepreneurs, business managers and employees of all religious beliefs, and further activities that will lead to the protection and creation of good quality employment and training opportunities that would be accessible to Coventry residents of all religious beliefs, and would improve labour market prospects and most likely the standard of living.
Sex	P	The interventions will be delivered through the implementation of this strategy will lead to the delivery of business support activities that will be tailored in a way that will be accessible to and benefit both male and female entrepreneurs, business managers and employees, and further activities that will lead to the protection and creation of good quality employment and training opportunities that would be accessible to both male and female Coventry residents, and would improve labour market prospects and most likely the standard of living.
Sexual orientation	P	The interventions will be delivered through the implementation of this strategy will lead to the delivery of business support activities

EQUALITY IMPACT ASSESSMENT (EIA)



	<p>that will be tailored in a way that will be accessible to and benefit entrepreneurs, business managers and employees of all types of sexual orientation, and further activities that will lead to the protection and creation of good quality employment and training opportunities that would be accessible to Coventry residents of all types of sexual orientation, and would improve labour market prospects and most likely the standard of living.</p>
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HEALTH INEQUALITIES

<p>2.3</p>	<p>Health inequalities (HI) are unjust differences in health and wellbeing between different groups of people which arise because of the conditions in which we are born, grow, live, work and age. These conditions influence our opportunities for good health, and result in stark differences in how long we live and how many years we live in good health.</p> <p>Many issues can have an impact: income, unemployment, work conditions, education and skills, our living situation, individual characteristics and experiences, such as age, gender, disability and ethnicity</p> <p>A wide range of services can make a difference to reducing health inequalities. Whether you work with children and young people, design roads or infrastructure, support people into employment or deal with welfare benefits – policy decisions and strategies can help to reduce health inequalities</p> <p>Please answer the questions below to help identify if the area of work will have any impact on health inequalities, positive or negative.</p> <p>If you need assistance in completing this section please contact: Alicia Philips or Lisa Young in Public Health for more information. More details and worked examples can be found at https://coventrycc.sharepoint.com/Info/Pages/What-is-an-Equality-Impact-Assessment-(EIA).aspx</p>	
<p>Question</p>	<p>Issues to consider</p>	
<p>2.3a What HIs exist in relation to your work / plan / strategy</p>	<ul style="list-style-type: none"> • Explore existing data sources on the distribution of health across different population groups (<i>examples of where to find data to be included in support materials</i>) • Consider protected characteristics and different dimensions of HI such as socio-economic status or geographical deprivation 	
<p>Response:</p>		

EQUALITY IMPACT ASSESSMENT (EIA)



	<p>The Health Inequalities most pertinent to this area of work are similar to those baseline challenges identified when Coventry secured Marmot City status. Namely that where someone is born, where they live, whether they work or not and what they do all affect how long someone will live, how healthy they will be and what quality of life they will experience. Men in the most affluent areas of the city will live, on average, 10.7 years longer than men in the most deprived areas, while for women the difference is 8.4 years.</p> <p>The Economic Development Service, working with key local and regional partners, and other Service Areas within the Council, has played an active part in forming the Council's response to the Call to Action, and will continue to do so through the implementation of this new Economic Development Strategy and the interventions that will be delivered as part of this.</p>
<p>2.3b How might your work affect HI (positively or negatively).</p> <p>How might your work address the needs of different groups that share protected characteristics</p>	<p>Consider and answer below:</p> <ul style="list-style-type: none"> ● Think about whether outcomes vary across groups and who benefits the most and least, for example, the outcome for a woman on a low income may be different to the outcome for a woman a high income ● Consider what the unintended consequences of your work might be
	<p>Response:</p> <p>a. Potential outcomes including impact based on socio-economic status or geographical deprivation</p> <p>We expect the implementation of this strategic to deliver positive benefits for areas of geographic deprivation, notably by creating the conditions and support services to enable businesses in these areas to prosper, and create new good quality employment and training opportunities (the latter, alongside implementation of the new Skills Strategy). This will also potentially deliver positive benefits to those unemployed and economically inactive, by providing them access to new employment and training opportunities that would facilitate positive labour market progression. It will also deliver positive benefits to those in employment (particularly the lower paid) by providing access to training opportunities or new jobs that would again facilitate labour market progression and potentially access to higher wages.</p> <p>b. Potential outcomes impact on specific socially excluded or vulnerable groups eg. people experiencing homelessness, prison leavers, young people leaving care, members of the armed forces community.</p>



As detailed above, an important emphasis of this strategy (alongside implementation of the new Skills Strategy) will be to create the conditions that will enable traditionally socially excluded groups to access new or improved employment and training opportunities.

2.4 Next steps - What specific actions will you take to address the potential equality impacts and health inequalities identified above?

In co-ordinating the implementation of this Strategy, we will continue to be actively involved in supporting Public Health and other Service areas and partners to reduce health inequalities. Indeed, the Strategy (alongside implementation of the Skills Strategy) pledges to work with businesses to tackle longstanding health inequalities, through increasing investment in skills and apprenticeships, implementation of fairer working practices and paying more staff the real living wage, engaging Unions and Trade Bodies in the process. We will also continue to support businesses in addressing recruitment challenges, which will entail co-designing training programmes alongside training providers, and (where possible) matching local jobseekers with new vacancies to reduce risks of worklessness widening health inequalities.

DIGITAL INCLUSION

2.5 The Covid-19 pandemic accelerated the uptake of digital services nationally, whereby people who are digitally enabled have better financial opportunities, can access new information and are better connected to others (Lloyds Consumer Digital Index, 2021). However, for those who are digitally excluded, the digital divide has grown during the last two years, and without intervention people will be left behind with poorer outcomes across employment, health and wellbeing, education and service access. Some people are more likely to be excluded including: older people, people from lower income households, unemployed people, people living in social housing, disabled people, school leavers before 16 with fewer educational qualifications, those living in rural areas, homeless people, or people who's first language is not English ([NHS Digital](#).)

Some of the barriers to digital inclusion can include lack of:

- **Access** to a device and/or data
- **Digital skills**
- **Motivation** to get online
- **Trust** of online safety

Digital exclusion is not a fixed entity and may look different to different people at different times.

Example 1. Person A, has access to a smartphone and monthly data and can access social media apps, however lacks the digital skills and confidence, and appropriate device to create a CV, apply for jobs and attend remote interviews, and/or access educational and skills resources.

EQUALITY IMPACT ASSESSMENT (EIA)



<p>Example 2. Person B, is digitally confident and has their own laptop, however due a lower household income and other financial priorities, they cannot afford their monthly broadband subscription and can no longer get online to access the services they need to.</p> <p>Example 3. Person C has very little digital experience and has heard negative stories on the news regarding online scams. Despite having the financial resource, they see no benefit of being online and look for alternatives whenever possible. A new council service requires mandatory online registration, therefore they do not access it.</p> <p>It is important that we all consider how we can reduce digital inequalities across our services, and this may look very different depending on the nature of our work.</p> <p>Please answer the questions below to help identify if the area of work will have any impact on digital inequalities, positive or negative.</p> <p>If you need assistance in completing this section please contact: Laura Waller (<i>Digital Services & Inclusion Lead, CCC</i>). More details and worked examples can be found at https://coventrycc.sharepoint.com/Info/Pages/What-is-an-Equality-Impact-Assessment-(EIA).aspx</p>	
Question	Issues to consider
2.5 What digital inequalities exist in relation to your work / plan / strategy?	<ul style="list-style-type: none"> • Does your work assume service users have digital access and skills? • Do outcomes vary across groups, for example digitally excluded people benefit the least compared to those who have digital skills and access? • Consider what the unintended consequences of your work might be.
	<p>Response:</p> <p>We anticipate that the interventions that would be delivered as part of the implementation of this strategy would target individuals and business managers with varied levels of digital skills. Indeed, we envisage that support to businesses to digitise in some form and support to improve the digital skills of the workforce will be featured within the interventions. As such, we do not anticipate that any interventions will be exclusively delivered in digital format.</p>
2.5b How will you mitigate against digital inequalities?	<ul style="list-style-type: none"> • If any digital inequalities are identified how can you reduce these? For e.g. if a new service requires online registration you may work with partner organisations to improve digital skills and ensure equitable processes are available if someone is unable to access online.
	<p>Response:</p>

EQUALITY IMPACT ASSESSMENT (EIA)



As detailed above, we envisage that support to businesses to digitise in some form and support to improve the digital skills of the workforce will be featured within the interventions that will be delivered as part of the roll-out of the strategy. As such, we anticipate that many of the interventions will be delivered in hybrid formats (some in person and some digitally).

2.6 How will you monitor and evaluate the effect of this work?

We will continue to consult with local businesses, business representative bodies and Trade Bodies on the extent to which there is a need to continue tackling the “digital divide” in terms of digital skills and the extent to which there is a need to provide additional digitisation support for businesses. We will also continue to consult with these bodies on the most appropriate format of delivery of our Economic Development and business support services to maximise take-up, notably the balance between digital and physical delivery.

2.7 Will there be any potential impacts on Council staff from protected groups?

There will be no additional impacts on Council staff from protected groups.

You should only include the following data if this area of work will potentially have an impact on Council staff. This can be obtained from: Nicole.Powell@coventry.gov.uk

Headcount:

Sex:

Female	
Male	

Age:

16-24	
25-34	
35-44	
45-54	
55-64	
65+	

Disability:

Disabled	
Not Disabled	
Prefer not to state	
Unknown	

Ethnicity:

Religion:

Any other	
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EQUALITY IMPACT ASSESSMENT (EIA)



White	
Black, Asian, Minority Ethnic	
Prefer not to state	
Unknown	

Sexual Orientation:

Heterosexual	
LGBT+	
Prefer not to state	
Unknown	

Buddhist	
Christian	
Hindu	
Jewish	
Muslim	
No religion	
Sikh	
Prefer not to state	
Unknown	

3.0 Completion Statement

As the appropriate Head of Service for this area, I confirm that the potential equality impact is as follows:

- No impact has been identified for one or more protected groups
- Positive impact has been identified for one or more protected groups
- Negative impact has been identified for one or more protected groups
- Both positive and negative impact has been identified for one or more protected groups

4.0 Approval

Signed: Head of Service: Steve Weir, Head of Economic Development	Date: 9th September 2022
Name of Director: Andy Williams, Director Business Investment Culture	Date sent to Director: 9th September 2022
Name of Lead Elected Member: Cllr Jim O'Boyle.	Date sent to Councillor: 15th September 2022

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To: Cabinet

Date: 11th October 2022

Subject: Coventry Economic Development Strategy 2022-2027

1 Purpose of the Note

- 1.1 To inform Cabinet of the recommendations from Scrutiny Co-ordination Committee following their consideration of the Coventry Economic Development Strategy 2022-2027

2 Recommendations

2.1 Cabinet is recommended to:

- 1) Approve the adoption of the Coventry Economic Development Strategy 2022-2027
- 2) That annual performance data on the strategy is presented to the appropriate scrutiny board.

3 Background and Information

- 3.1 Members of the Committee considered the Cabinet Report and the Committee asked a number of questions and the following points were discussed:
- How the performance and the success of the strategies would be measured, including the indicators the One Coventry Plan
 - The frequency of performance reporting of the strategies to Scrutiny
 - The challenge of the current economic climate for businesses
 - Retrofit grants for Registered Social Landlords and a retrofitting project in Foleshill were outlined
 - The development of the Gigafactory site
 - A summary progress of City Centre South was given with a public report to Cabinet due in the Autumn
 - Investment Zones would be subject to a bidding process and no details of this were known at the time of the meeting
 - How the strategies would be communicated to, and benefit Coventry communities was discussed
 - The role and purpose of Equality Impact Assessments was outlined in relation to the development of new strategies
 - Social Value data will form part of the evaluation process
 - Options to use employment land for open spaces
 - A full Equalities Impact Assessment has been completed for the new strategy including Health Inequalities.

Gennie Holmes
Scrutiny Co-ordinator
024 7697 1857

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Scrutiny Coordination Committee
Cabinet

28 September 2022
11 October 2022

Name of Cabinet Member:

Cabinet Member for Jobs, Regeneration and Climate Change – Councillor J O’Boyle
Cabinet Member for Education and Skills – Councillor K Sandhu

Director Approving Submission of the report:

Chief Partnerships Officer/ Director of Education and Skills - Kirston Nelsen

Ward(s) affected:

All

Title:

Coventry Skills Strategy 2022-2030

Is this a key decision?

Yes – as it has the potential to positively affect all wards within the city.

Executive Summary:

This is Coventry’s first ever citywide Skills Strategy. The Coventry Skills Strategy takes a holistic approach to the skills system from early years through to lifelong learning to achieve the best outcomes for our residents and businesses. It plays a pivotal role in delivering on the ambitions of the ‘One Coventry 2022-2030 Plan’ in helping to increase the economic prosperity of the city, addressing climate change and tackling inequalities within our communities. The approach reflects collaborative principles of the One Council Plan with shared work across Council teams and services, residents, education/skills providers, employers, other public sector bodies and community organisations. It serves as a ‘framework for action’ with partners learning and developing creative solutions to skills challenges together to meet our three Strategic Ambitions and the eight Priority areas within them:

Strategic Ambition 1: A comprehensive, citywide skills offer that raises aspirations and allows each and every resident throughout their lives to reach their full potential.

- 1. Skills Levels:** To improve the overall skills levels of Coventry residents.
- 2. Aspiration:** Further develop a skills system that inspires residents to achieve from primary school through to lifelong learning.
- 3. Progression Pathways:** Providing a clear line of sight for people to progress through Coventry’s skills system.

Strategic Ambition 2: A skills ecosystem which ensures that all, including those most in need, are able to participate in, progress and achieve success.

4. Community: A skills system which meets the needs of all residents and is widely accessed by all Coventry communities, including newly arrived communities.

5. Inclusion: A skills system which is fully inclusive and representative of our diverse City.

6. Highest Needs: A skills system which supports those most in need, with a ‘proportionate universalism’¹ approach, helping people out of poverty and creating a more equal City.

Strategic Ambition 3: A flexible and responsive system that works together with our growing, investing and local businesses to deliver the right skills mix for our dynamic labour market.

7. Skills for business: A skills system which provides the skills required by Coventry’s businesses, both current and future and contributes to economic growth and the prosperity of the City and Region.

8. Social Value and Sustainability: A skills system which is well positioned to maximise increased commitment to social justice, respect, community, and responsibility including Coventry’s commitment to tackling climate change.

Shared goals with the Economic Development Strategy

The Skills Strategy is fully integrated with Coventry City Council’s new Economic Development Strategy 2022-2025.* Through the two strategies we will achieve three common goals:

1. **Getting the skills and opportunities right for investment:** Develop a ‘team around’ approach for investments and large developments with expertise brought together from across the Council to ensure early, comprehensive planning better meets business need and ensures maximum benefit for Coventry.
2. **Co-designing skills solutions with businesses:** Designing together with industry and skills partners to ensure the skills system is responsive, innovative and produces the right skills mix for now and the future. This includes supporting employers to maximise social value commitments.
3. **In-work upskilling with local employers:** Collaborations which encourage access to skills and workplace development at all levels.

¹ ‘Proportionate Universalism’ is an approach developed by Sir Michael Marmot and applied throughout health and other services in the UK. The resourcing and delivering of universal services is at scale and intensity proportionate to the degree of need.

Recommendations:

Scrutiny Co-ordination Committee is recommended to:

- 1) Consider the content of the report and appendices
- 2) Identify any recommendations for Cabinet

The Cabinet is asked to:

- 1) Consider any recommendations or comments from Scrutiny Co-ordination Committee.
- 2) Approve the Coventry Skills Strategy 2022-2030.
- 3) Receive an annual monitoring report on the progress towards the Strategy's aspirations and the progress each 'Action Group' has made against the 8 priorities.

List of Appendices included:

Coventry Skills Strategy 2022-2030

Background papers:

None

Other useful documents

West Midlands Combined Authority Regional Skills Plan 2016
West Midlands Combined Authority AEB Plan 2022-2025
West Midlands Combined Authority Plan for Growth 2022.

Has it been or will it be considered by Scrutiny?

Yes – Scrutiny Coordination Committee, 28th September 2022.

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

Coventry Skills Strategy 2022-2030

1. Context and Background

- 1.1 This is the first ever citywide skills strategy, taking a holistic approach to the skills system from early years through to lifelong learning to achieve the best outcomes for our residents and businesses. It is one of the key strategies for delivering the objectives of the new One Coventry Plan 2022-2030, and is strongly integrated with the new Coventry Economic Development Strategy 2022-2027. Its purpose is to serve as a framework for action with partners learning and developing creative solutions to skills challenges together.
- 1.2 In the last 5 years Coventry has successfully raised skills levels driving down the numbers of residents with no qualifications by 14,700 and achieved a substantial increase in the numbers of residents qualified at NVQ2 with 43,700 more residents qualified to NVQ2 or above. We have also made significant progress in becoming a more highly skilled City with 37,000 more residents qualified to NVQ3 or above. Coventry's school Ofsted results have also significantly improved with 92% of Primary Schools and 86% of Secondary Schools now rated as good or outstanding.
- 1.3 However, like any major city Coventry still faces challenges. The city is responding to economic challenges presented by the recession caused by the Covid-19 pandemic, growing challenges around adjusting to new UK-EU trading regulations after Brexit and wider global supply chain disruption, and ongoing cost of living and cost of doing business challenges. We trail national averages for skills levels and this strategy considers ways to level up in order to provide the skills we need to meet the challenges we face.
- 1.4 We want Coventry residents to have skills that match the needs of local employers, not only for now, but also for the vacancies of the future. We want to ensure learning and skills provision meets the needs of all Coventry's communities, is fully inclusive and plays a key role in reducing poverty. We want to build aspiration throughout all educational levels, with Coventry's young people inspired to learn, seeing clear pathways to the jobs they strive towards.
- 1.5 In developing the Strategy, we have consulted directly with a wide variety of stakeholders including officers across Coventry City Council, key external partners including skills providers and voluntary and community sector organisations and members of the public through the One Coventry Plan consultation process and Strategy Carousel events (over 100 stakeholders in total). In addition, we held a Citywide Skills Survey which was open between 16th November 2021 to 11th January 2022 and was completed by 259 residents. The Skills Survey played a key role in informing the priorities for the Skills Strategy. A full list of stakeholder engagement is attached in **Appendix D**.
- 1.6 The Skills Strategy will be one of the foremost strategies in delivering the objectives of the 2022-2030 One Coventry Plan. It will be central to the objective of Increasing Economic Prosperity by ensuring businesses have the skills they need to survive, thrive and grow. It will improve outcomes and tackle inequalities for communities by ensuring those who need it most get the skills needed to secure good quality employment and progress within the workplace. The strategy will be key to delivering the objectives of Tackling the Causes and Consequences of Climate Change by providing the green skills needed both now and in the future. The Council's role as a Partner, Enabler and Leader will be crucial in working collaboratively with funders such as WMCA, external skills providers, universities, employers and the voluntary and community sector. Finally, by supporting more residents into better jobs the Skills Strategy plays a crucial role in Improving the Financial Sustainability of the Council by increasing Council Tax income and reducing costs associated with unemployment/low paid employment.

- 1.7 Partnership work will be integral to the roll-out and delivery of this strategy. This strategy serves as a 'framework for action' and the Action Groups formed to achieve our priorities will involve many Service Areas across the Council, and work with external skills providers, universities, employers and the voluntary and community sector. In addition, the Council will work closely with regional funders such as WMCA and national funding bodies such as ESFA. Coventry City Council's Employment and Skills Service will be responsible for overall co-ordination of the Strategy but will collaborate particularly closely with the Economic Development Service on our shared priorities. In addition, the Employment and Skills Service will work closely with colleagues from Education, the Migration Team, Climate Change and Sustainability and Early Help amongst others.

2 Options Considered and Recommended Proposal

- 2.1 Option 1: The Council can choose not to have a Coventry Skills Strategy, and to instead rely on the strategic plans of WMCA such as the Regional Skills Plan 2016 and the AEB Plan 2022-2025. The risk with this approach is that it does not have a local focus which considers the needs of Coventry residents and businesses and the priorities that are locally important to specific neighbourhoods within the city. It would also reduce opportunities for focused interactions with key local stakeholders.
- 2.2 Option 2 is the development of a Coventry Skills Strategy that gives Coventry a new skills focus and takes a holistic view of Coventry skills system. It places Coventry residents and businesses at the heart of the skills system focusing on getting the best outcomes for our City – increasing skills levels, raising aspiration, building effective progression pathways, ensuring the skills system serves our communities, is inclusive and supports those with highest needs, and ensuring we get the right skills for our businesses and the green skills needed to protect our climate.
- 2.3 It is recommended that the Cabinet supports Option 2 and endorses the Coventry Skills Strategy.

3 Results of Consultation Undertaken

- 3.1 Over 100 stakeholders were consulted to inform the Skills Strategy Priorities and detail. These included officers within the Authority across all Divisions, key local and regional skills partners (these included local universities, colleges and independent training providers), voluntary and community sector organisations, and members of the public through the One Coventry Plan consultation process (this included attendance at the Strategy Carousel event) and the Skills Survey. A full list of the stakeholders consulted is attached in **Appendix D**.
- 3.2 Through the consultation process, we were able to determine the most important priorities for Coventry's Skills System. We presented the strategy to the One Coventry Leadership Team in July 2022, alongside the new Economic Development Strategy 2022-2027 to secure endorsement of all Council Directors.
- 3.3 It is also worth noting that the Council's Scrutiny Committee will be considering the Coventry Economic Development Strategy 2022-2027 on 28th September 2022.

4 Timetable for Implementing This Decision

4.1 The Coventry Skills Strategy 2022-2030 is an 8-year strategy in line with the One Coventry Plan. Progress will be reported annually to the relevant Cabinet Members (Jobs, Regeneration & Climate Change, and Education and Skills) and to Cabinet.

5 **Comments from Chief Operating Officer (Section 151 Officer) and the Director of Law and Governance**

5.1 **Financial implications**

5.1.1 Coventry City Council will take the lead role as an enabler for change with the Skills Strategy, working with funders to shape skills resources and with delivery partners to ensure city-wide provision leads to a comprehensive and quality skills offer for our residents. Implementation of the Strategy will be led by Employment & Skills Service officers who will co-ordinate the Collaborative Action Plans agreed across the network of skills providers.

5.1.2 The ability to deliver the skills strategy will depend on sufficient available resources across the city. The vast majority of skills funding is from grant, either direct from Government departments or via devolved administrations such as West Midland Combined Authority (WMCA). Funding sources are currently in a period of transition as WMCA seeks to further align skills funding to an employment focus but the City Council is already working closely with WMCA in order to influence funding policy, minimise potential funding turbulence and shape the commissioning of skills provision across the FE sector. It is impossible to guarantee the consistent availability of grant funding over the longer-term life of this strategy, but as set out above Council officers will continue to liaise with appropriate funding bodies and seek to maximise funding opportunities to support the Skills Strategy from external grant sources.

5.2 **Legal Implications**

5.2.1 There are no direct legal implications arising out of this report at this stage, save for noting the Council's duty under the Equality Act 2010

5.2.2 Whilst there is no statutory duty to produce a Skills Strategy doing so provides an important framework for helping to deliver the Council's statutory obligations and will help drive forward the One Coventry Plan 2022-2030.

5.2.3 The Equality Act 2010 requires public authorities to have regard to the need to eliminate discrimination and advance equality of opportunity. The Council must further take into account its wider Public Sector Equality Duty (PSED) under s. 149 of the Equality Act 2010 when making its decisions. The public sector equality duty (s.49, Equality Act 2010) requires the Council when exercising its functions, to have 'due regard' to the need to eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Act, advance equality of opportunity between those who share a 'protected characteristic' and those who do not share the protected characteristic and foster good relations between persons who share a relevant protected characteristic and persons who do not share it (this involves having due regard, in particular, to the need to (a) tackle prejudice and (b) promote understanding). As such, Diversity, Equality and Inclusion are key priorities within this strategy, and cut across all other priorities.

A full Equality Impact Assessment (EIA) is attached in **Appendix E**.

5.2.4 The Council will consider the impact of any projects or changes to service delivery that might arise as a result of implementing work coming out of this strategy on those protected equality characteristics. Individual proposals will be subject to an Equality Impact Assessment

wherever relevant prior to any decision taken to proceed, including the identification of mitigating action, where possible.

6 Other implications

6.1 How will this contribute to the Council Plan (www.coventry.gov.uk/councilplan/)?

6.1.1 The Coventry Skills Strategy 2022-2030 will be one of the foremost strategies for delivering the One Coventry Plan and its five objectives:

6.1.2 **Increasing the Economic Prosperity of the City and Region.** The Coventry Skills strategy will contribute heavily towards delivering this objective, by ensuring that businesses get the skills they need to survive, thrive and grow. In addition, supporting residents to get the skills they need to enter work increases their spending power, contributing to Coventry's circular economy. This will increase further for residents supported to upskill within the workplace and move into higher paid roles.

6.1.3 **Improving Outcomes and Tackling Inequalities Within our Communities.** The Coventry Skills Strategy plays a key role in achieving this objective. It does this by ensuring that our skills system meets the needs of all Coventry's communities and is fully inclusive. This includes ensuring that we improve job outcomes and skills levels for communities from more deprived areas of the city and for residents from ethnic minorities, including newly arrived communities. The strategy also ensures that we continue to shape our skills system to provide the most support for those with the highest needs such as disabilities, health conditions, single parents, substance misuse issues and ex-offenders using a 'proportionate universalism' approach. Finally, the strategy considers how we support businesses to maximise their social value commitments, especially employing more Coventry residents with higher needs.

6.1.4 **Tackle the Causes and Consequences of Climate Change.** The Coventry Skills Strategy makes a significant contribution to this objective by ensuring that we provide the green skills that businesses need both now and in the future. In addition, we will ensure schools, colleges and adult education providers are embedding climate change content into their curriculums. We will shape school and college careers advice to inspire young people to see the potential of green jobs and inspire the 'green' innovators of the future.

6.1.5 **Continued Financial Sustainability of the Council.** Supporting residents to gain the skills they need to get into work will increase Council Tax revenue and decrease other costs to the Council. The Manchester New Economic Toolkit (2019), a Government approved tool, estimates that the average economic value to the local economy of a long term unemployed person entering work is £14,790 per annum. In addition, supporting businesses to get the skills they need will help more businesses to survive, thrive and grow which has a positive impact on Business Rates revenue.

6.1.6 **Council's Role as a Partner, Leader and Enabler.** Partnership working is integral to the Coventry Skills Strategy. The Coventry Skills Strategy serves as a 'framework for action' with action groups formed to achieve our priorities. These action groups will be led by Coventry City Council Employment and Skills Service and include colleagues from the Economic Development Service, Education, The Migration Team, Climate Change and Sustainability and Early Help amongst others. In addition, we will include a range of external partners such as schools, colleges, universities, independent training providers, WMCA, DWP and the voluntary and community sector.

6.2 How is Risk Being Managed?

6.2.1 The Council has a strong track record of managing risks and maintaining significant financial controls and well-established procedures when handling public funds. The key risks associated with the strategy, and how they will be managed include:

- **Economic uncertainty.** With the Bank of England forecasting a recession for late 2022 and throughout 2023, the Council will need to act flexibly and be able to adapt projects and services best support residents and businesses.
- **The changing public funding environment.** With the UK no longer able to access EU Structural Funds beyond June 2023, the way many business, skills and employment support activities will be funded in Coventry and other areas of the UK will change. This could also entail changes in the quantum of funds, focus of the funds, and how the funding is administrated. Coventry City Council is proactively responding to these changes through identifying more innovative ways of funding its priorities (including both through core and external funding sources), and further strengthening partnership approaches to delivery.
- **Securing commitment of partners to work jointly on delivery of the strategy.** Stakeholders both internal and external to the Council have responded very positively to the strategy, and we envisage that already strong partnership working arrangements will be enhanced in delivering the strategy through our Action Groups.

6.3 What is the Impact on the Organisation?

6.3.1 HR Implications

The implications of this strategy in terms of funding the staff that will be directly responsible for delivering many of the activities, and facilitating successful partnership work, has been covered in Section 5.1. In respect of the wider Council, the Coventry Skills Strategy 2022-2030 will have wide reaching positive impacts on the residents of Coventry. These include improving health and wellbeing, targeting vulnerable groups and boosting local businesses and job creation. This should reduce reliance on other Council services (thereby mitigating against risks of the need to find extra financial resources for additional staff) and have public health benefits.

6.3.2 Equality and Consultation Analysis (ECA)s

One of the key priorities of the Coventry Skills Strategy is to ensure that our skills system meets the needs of all Coventry communities. In addition, there is a priority around 'inclusion' ensuring that our skills system is fully inclusive including good destinations for all ethnic groups. Finally, the strategy has a priority of ensuring that the skills system meets the needs of those who may be considered to have 'higher needs' such as health conditions, disabilities, single parents, care leavers, those with substance misuse issues and ex-offenders.

A full Equality Impact Assessment (EIA) is attached in **Appendix E**.

6.3.3 Implications for (or impact on) Climate Change and the Environment

As detailed above, the strategy will have positive impacts on climate change and the environment, and will be one of the most important strategies in achieving the One Coventry Plan's objective of "Tackling the Causes and Consequences of Climate Change". This strategy will also be strongly aligned with the new Coventry Climate Change Strategy.

6.3.4 Implications for Partner Organisations?

The Strategy will be delivered in partnership with stakeholders across the city, sub-region and West Midlands region. The strategy serves as a 'framework for action' and the actions will not be able to be delivered by the Council on its own. Engaging partners will be crucial to the success of the strategy's Action Plans.

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Names of approvers for submission: (officers and members)				
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John Redfern/ Linden Dunham	Major Projects Lead Lawyer	Law and Governance	12/09/2022	16/09/2022
Kirston Nelson	Chief Partnerships Officer/ Director of Education and Skills	Education and Skills	20/09/2022	20/09/2022
Councillor K Sandhu	Cabinet Member for Education and Skills	-		
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This report is published on the council's website: www.coventry.gov.uk/councilmeetings

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Forward

(Cllr Duggins/Cllr Sandhu)

I am proud to launch our first ever Citywide Skills Strategy which provides a 'framework for action' across all educational stages working collaboratively to get the best skills outcomes for our residents, from early education through to lifelong adult learning.

In the decade between 2010 and 2019 Coventry achieved great economic growth and reduced inequalities. Coventry made significant progress in driving down unemployment - particularly youth unemployment which since 2015 has remained well below the national averages. Coventry's flagship Job Shop has supported over 1000 residents each year into employment and the model has been replicated by other Local Authorities. Coventry's successes were reflected in the securing of City of Culture 2021 as well as acting as host venue for the 2022 Commonwealth Games and the International Children's Games. Coventry significantly raised its skill levels, and its school Ofsted results with 92% of primary schools and 86% of secondary schools now rated as good or outstanding.

Unfortunately, the combined impacts of Brexit and the COVID-19 pandemic have presented many new challenges to Coventry's economy and the city's businesses and residents. We have now entered a cost-of-living crisis which is putting significant pressure on household budgets and presenting a growing challenge of in-work poverty. Building on the publication of our One Coventry Plan 2022 – 2030 priorities¹ the Skills Strategy is very timely. It supports an increase to the economic prosperity of the city in ensuring that businesses have the right skills to grow. It tackles inequalities by making sure skills provision is equally accessed by all Coventry's communities, with our residents gaining the skills they need to secure good employment and progress within it. Finally, the Skills Strategy plays a key role in tackling the causes and consequences of climate change by ensuring residents gain the right skills to support green jobs growth.

¹ Hyper-link to One Coventry Plan to be added

Executive Summary

Coventry has made significant progress in becoming a higher skilled City in the last 5 years.

We have driven down the numbers of residents with no qualifications by 14,700. We have achieved a substantial increase in the numbers of residents qualified at NVQ2 with 43,700 more residents qualified to NVQ2 or above. We have also made significant progress in becoming a more highly skilled City with 37,000 more residents qualified to NVQ3 or above. ~~(from 50% to 59.3%).~~

Coventry is a diverse city both in terms of its resident population and its business base. Coventry has the second highest resident average pay in the WM region and the lowest levels of youth unemployment. There are a wide range of vacancies with particular strengths in the public sector and advanced manufacturing, and a growing 'culture, tourism and leisure' sector boosted by City of Culture 2021.

Like any major city Coventry still faces challenges. We trail national averages for skills levels and this strategy considers ways to level up. However, we do not want to improve skills levels for the sake of comparisons and measures. We want Coventry residents to have skills that match the needs of local employers, not only for now, but also for the vacancies of the future. We want to ensure learning and skills provision meets the needs of all Coventry's communities, is fully inclusive and plays a key role in reducing poverty. We want to build aspiration throughout all educational levels, with Coventry's young people inspired to learn, seeing clear pathways to the jobs they strive towards.

This Strategy plays a pivotal role in delivering on the ambitions of the 'One Coventry 2022-2030 Plan' in helping to increase the economic prosperity of the city, addressing climate change and tackling inequalities within our communities. The approach reflects collaborative principles of the One Council Plan with shared work across Council teams and services, residents, education/skills providers, employers, other public sector bodies and community organisations. It serves as a 'framework for action' with partners learning and developing creative solutions to skills challenges together to meet our three Strategic Ambitions and the eight Priority areas within them:

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- 1. Skills Levels:** To improve the overall skills levels of Coventry residents.
- 2. Aspiration:** Further develop a skills system that inspires residents to achieve from primary school through to lifelong learning.
- 3. Progression Pathways:** Providing a clear line of sight for people to progress through Coventry's skills system.

Strategic Ambition 2: A skills ecosystem which ensures that all, including those most in need, are able to participate in, progress and achieve success.

- 4. Community:** A skills system which meets the needs of all residents and is widely accessed by all Coventry communities, including newly arrived communities.
- 5. Inclusion:** A skills system which is fully inclusive and representative of our diverse City.

6. Highest Needs: A skills system which supports those most in need, with a ‘proportionate universalism’² approach, helping people out of poverty and creating a more equal City.

Strategic Ambition 3: A flexible and responsive system that works together with our growing, investing and local businesses to deliver the right skills mix for our dynamic labour market.

7. Skills for business: A skills system which provides the skills required by Coventry’s businesses, both current and future and contributes to economic growth and the prosperity of the City and Region.

8. Social Value and Sustainability: A skills system which is well positioned to maximise increased commitment to social justice, respect, community, and responsibility including Coventry’s commitment to tackling climate change.

Shared goals with the Economic Development Strategy

The Skills Strategy is fully integrated with Coventry City Council’s new Economic Development Strategy 2022-2025.* Through the two strategies we will achieve three common goals:

1. **Getting the skills and opportunities right for investment:** Develop a ‘team around’ approach for investments and large developments with expertise brought together from across the Council to ensure early, comprehensive planning better meets business need and ensures maximum benefit for Coventry.
2. **Co-designing skills solutions with businesses:** Designing together with industry and skills partners to ensure the skills system is responsive, innovative and produces the right skills mix for now and the future. This includes supporting employers to maximise social value commitments.
3. **In-work upskilling with local employers:** Collaborations which encourage access to skills and workplace development at all levels.

² ‘Proportionate Universalism’ is an approach developed by Sir Michael Marmot and applied throughout health and other services in the UK. The resourcing and delivering of universal services is at scale and intensity proportionate to the degree of need.

Setting the Scene: The need for a more Equal Coventry and Sustained Economic Recovery

The Economy

Challenging Economic Climate, Following a Decade of Success:

In the 10 years after the 2008/09 recession, Coventry & Warwickshire was the fastest-growing local economy in England, with economic output (measured in real GVA) growing by 33.4% between 2008/09 and 2016/17. This was driven significantly by major investments in Research & Development and production in the automotive sector - providing a platform for the creation of new good quality jobs and training opportunities. During this period, Coventry also secured UK City of Culture 2021, was selected as a host venue for the 2022 Commonwealth Games, and was part of the West Midlands 5G Test Bed (the first of its type in the UK) – all of these were expected to provide the conditions for creating new job and training opportunities in other sectors, including creative industries and tourism & hospitality.

However, the performance of the local economy has slowed, reducing the capacity to create new employment and training opportunities. For example, in 2018/2019, Coventry & Warwickshire recorded the lowest growth rate of all local economies (1.24%) and in 2020, the West Midlands experienced the biggest economic contraction of all regions due to the Covid-19 pandemic. This led to a significant increase in the Claimant Count (numbers claiming unemployment related benefits) from 7,825 (3.2%) in February to 16,490 (6.6%) in December 2020 (the peak pandemic level). This exacerbated longstanding inequalities in the city, with the highest increases in the Claimant Count seen in Coventry's most deprived wards.

The economy's capacity to recover and has also been constrained since this date with inflation, increases in the cost of energy and materials, labour shortages, and supply chain disruption for key components and materials, all being key factors limiting economic growth. The regulations for trade between the UK and EU post Brexit and additional document requirements, have also slowed the recovery. With the Bank of England's forecasts from August 2022 projecting a recession during Q4 2022 and all of 2023, there are risks that this could create further structural economic challenges and widen inequalities. An important objective of this Skills Strategy is to therefore ensure that Coventry's labour force is able to secure the necessary skills to enable them to access new opportunities that will emerge from structural economic change, and thereby enhance their standard of living. As an enabler of change, the Council will help our businesses to better reflect the communities they serve, encouraging employers to look at alternative methods of recruitment and to appoint more diverse workforces.

Demographics

Coventry's has a dynamic and adaptable labour force that could play an active role in supporting the economic recovery:



A young population: Coventry has a median age of 32 years compared to the UK average of 40. The pandemic in 2020 had a disproportionate impact on younger workers, due to the sectors most impacted by lockdowns, but through upskilling of the labour force (one of the central priorities within this strategy), this demographic could have an important role to play in accelerating the growth of emerging and expanding sectors of the economy.



Expected growth in 65+ age group: The 65+ age group is expected to become the fastest-growing demographic over the next 15 years, and the transferrable skills and experience of this demographic could again have an important role to play in facilitating economic restructuring. Those 75+ represent 6% of the city's population compared to a UK average of 9%. However, by 2043 there is expected growth in 75+ residents of 8%.³



A diverse City: 33% of Coventry's population are from ethnic minority backgrounds, compared to 20% for England as a whole.⁴ Coventry's population is expected to become more diverse: among schoolchildren, 48.7% of pupils are from ethnic backgrounds other than White British, and it will be essential that we ensure that any barriers these groups face in accessing employment and training opportunities are tackled within Coventry's skills system.



Becoming less economically deprived and more equal: The 2019 Indices of Multiple Deprivation (IMD) report⁵ showed significant improvements compared to 2015. Coventry moved from 34th most deprived Local Authority area to 64th. The number of neighbourhoods ranked within the most deprived 10% in the UK also decreased from 36 to 28. This improvement was driven in part by improving schools, a significant decrease in unemployment, supported by Coventry City Council's Job Shop, and rising resident wages. This Skills Strategy will contribute towards further reducing the number of neighbourhoods ranked within the most deprived 10% by providing residents in these areas with more access to good quality jobs and training opportunities.



Inequalities for women: Average weekly wages for women in Coventry are £173 less than those of male residents. This compares unfavourably to the national average gender pay gap of £97. Coventry also has statistically high numbers of economically inactive women with a gap of 9.6% between economically inactive women and men in Coventry which is larger than the National Average of 5.7%.⁶ A key focus of this Skills Strategy is ensuring that women in Coventry can access the best skills provision to help them into work or to progress to better paid roles, with courses delivered with the right flexibility.



Improving outcomes for disability and health conditions: Coventry has just over 10,000 residents claiming Employment Support Allowance, the main out of work benefit for people with disabilities and health conditions. This number has decreased in the last 5 years. Coventry has proportionally less people economically inactive due to long term sickness than the national averages.⁷ Coventry has been particularly successful in supporting residents with learning disabilities to progress straight from education into employment through our innovative Supported Internship programmes with University Hospital Coventry and Warwickshire (UHCW) and Warwick University, which have seen over 70% progress into paid work. This Skills Strategy seeks to increase innovative provision such as Supported Internships and ensure mainstream provision is sufficiently flexible to support the needs of people with disabilities and health conditions leading to good outcomes for these groups.

³ One Coventry (draft)

⁴ [Coventry City Council Website - Facts About Coventry](#)

⁵ [Coventry City Council IMD Summary Report](#)

⁶ [Nomis \(ONS\)](#)

⁷ [Nomis \(ONS\)](#)



Still challenges in health outcomes: The Covid pandemic has exacerbated longstanding inequalities, especially in health outcomes with life expectancy varying by 10.7 years for men and 8.3 years for women between the City's most affluent and most deprived neighbourhoods.⁸ In delivering this strategy, we will work with businesses to tackle longstanding health inequalities, through increasing investment in skills and apprenticeships, implementation of fairer working practices and paying more staff the real living wage, engaging Trade Bodies, Unions and other relevant stakeholders in the process

Labour Market

The characteristics of Coventry's labour force will influence the focus of where our skills support activities need to be over the next five years:



High employment in professional occupations: 26.4%, compared to a National Average of 23.3%. There is a high concentration of public sector employment: Coventry City Council, one of the largest Job Centres in the country, a large regional hospital and offices for several national civil service bodies such as The Department for Education and the Local Government and Social Care Ombudsman. Also, two large Universities which combined employ over 11,000 people, many in Professional Occupations, including engineering specialisms in support of Coventry's advanced engineering research and development. There will continue to be a need for labour with the requisite generic, leadership and management, and technical skills to fill new roles, so it is vital that we enable the local education and training system to produce a local labour force with these vital skills.



Strong employment in manufacturing sector: 6.1% of Coventry's workforce compared to a national average of 5.6%. Although the Covid pandemic caused a contraction of 2,300 jobs in this sector, advanced manufacturing & engineering is a sector where we aspire to create further growth (notably through growing electric vehicle and battery supply chains). It is therefore crucial that our skills system continues to produce a supply of local labour with the required high-level technical skills.



Low proportion of residents employed as Managers, Directors and Senior Officials: 5% compared to a national average of 10.9%, although this is in partly due to many of those working in these roles in Coventry businesses commuting from outside the city. A key objective within the Skills Strategy is to raise aspirations of Coventry residents across all neighbourhoods, and expand provision and maximise take-up of Leadership & Management training to enable more Coventry residents to progress into these types of roles.



Higher than average vacancy numbers: As with much of the UK over the last year Coventry has had higher than average numbers of vacancies. Employers particularly struggled to fill roles in hospitality and logistics, Health & Social Care (notably nursing roles in the NHS), and programme and software development roles across a range of sectors. This is a further challenge slowing the economic recovery, especially as many of these sectors employed high volumes of "EU nationals", who have since left the UK labour market. We will therefore work with employers, trade bodies unions, and training providers to ensure that training courses are designed in a way that delivers the skills the sectors need, and to

⁸ [Coventry City Council Website - Facts About Coventry](#)

identify Coventry residents that could potentially benefit from upskilling and fill the vacancies.



Many vacancies are low skilled/low paid and insecure: Skills solutions can support sectors experiencing labour shortages, however for many of the roles available the issue is more 'labour' as opposed to 'skills' shortage. Many roles in logistics, hospitality and care for example require elementary skills, have limited entry requirements, are lower paid and more insecure and struggle to attract candidates as a result. We will therefore work with employers, trade bodies and unions to drive improvements in the terms of employment within these sectors and develop and promote clearer career development paths. We will also provide support to these businesses in tackling recruitment challenges, and through the Job Shop, match local residents that could potentially fill new vacancies.

Making Our Priorities Happen:

Each of our Priorities will have an Action Plan, developed in collaboration with relevant partners across the city and setting out key performance indicators. These Collaborative Skills Plans will provide the basis for partners, residents and employers to explore challenges and create innovative responses which lead to the improvement of our local skills offer. By encouraging experimentation and learning, this approach will allow the city to better respond to significant economic and societal challenges. It also represents an ask of Coventry's stakeholders to work in a different way, collaborating and designing solutions with the voice of our communities at the centre.

As such there will be actions resulting from this Strategy which are not yet known but will be developed within the Collaborative Skills Plans. The information below sets out some of the existing and planned activity which will help this Strategy's approach come alive and begin our journey towards a more comprehensive and responsive skills offer: one which ensures all our communities can progress and achieve success.

Further detail on the evidence base and how we have arrived at these priorities is contained in Appendix (B).

1. Overall Skills Levels: Improve the overall skills levels of Coventry residents

Our Aim: Bring skills levels for number of residents with no qualifications and numbers with NVQ1, 2 and 3 and above in line with National Averages.

We will achieve this by:

- **Building on the success of Coventry City Council's Education Partnership:** This has supported primary schools to improve from 42% good or outstanding in 2013 to 92% good or outstanding in 2021.
- **Ensuring Coventry's children fulfil their potential:** We will continue to ensure that education is focusing on giving every child and young person the skills they need to fulfil their potential and reach the right successful destination in adulthood. We will continue to invest in our collaborative approach working in partnership with all schools and delivering on local and national priorities. We will use additional investment available for Education Improvement Areas to support this and continue to secure attainment improvements and close the gap with the national position.
- **Providing holistic support for whole families:** Working in our communities and in collaboration with key partners to support families with wider issues which affect educational attainment. Includes parenting support, mental health support for children and parents, healthy eating guidance, money advice and increasing access to digital devices to support learning. These actions are described in more detail in Coventry's [Early Help Strategy 2020-22](#) and the [Multi Agency Parent Strategy 2020-2023](#).
- **Supporting families from newly arrived communities:** We are proud to be recognised as a City of sanctuary and continue to welcome refugees and asylum seekers from war-torn countries to live in the city. We will continue to work with refugee and migrant families to help overcome barriers, especially language barriers that can affect educational attainment.
- **Supporting our Further Education providers to provide a high quality offer:** Ensuring high levels of participation and a high quality offer at all levels.
- **Continuing to Increase participation in adult education, ensuring quality:** Supporting Skills Providers to provide courses of the right quality, marketed well and meeting resident need. Employment Support Providers such as the Coventry Job Shop providing high

quality advice and guidance, including bespoke careers guidance from the National Careers Service (NCS). In addition, community organisations and libraries act as both a referral route and also as providers of lower level/unaccredited skills courses as a key progression pathway into higher level courses.

- **Working to improve graduate retention:** Coventry currently retains approximately 15% of graduates, the 4th lowest in the UK. We will work with our Universities and local employers to improve the graduate retention offer and to increase the volume and quality of graduate level jobs. We will continue to support Coventry University's aspiration to expand their employability offer helping their graduates to secure careers locally (Coventry University 2030 Group Strategy⁹)
2. **Aspiration: An aspirational skills system that inspires residents to achieve from primary school through to lifelong learning**

Our Aim: For high aspirations to be built into Coventry's Skills System from a young age (primary school) and to remain all the way through to lifelong learning.

We will achieve this by:

- **Supporting our Primary Schools to increase employer interactions:** Using our Coventry City Council led networks of employers, working through 'One Coventry' partnerships to provide inspiring employer interactions – developing even higher ambitions for Coventry's children and their parents.
- **Inspiring 'green futures' programmes:** Inspiring our children and young people to want to take action and to gain the skills required to address the causes and consequences of climate change.
- **Supporting parents to have high aspirations for their children:** Parenting support, starting from early years, including helping parents to improve their own skills levels and move into or progress within employment. This can improve parental wellbeing, including self-esteem, positively impacting the aspirations they have for their children.
- **Increasing higher education engagements in our Primary and Secondary Schools:** Partnering with Coventry and Warwick Universities to encourage more of Coventry's children and their parents to see higher education as an option.
- **Building on the success of CW Careers Hub:** 30 out of 33 of Coventry's Secondary schools/colleges are signed up with the Coventry and Warwickshire Careers Hub (CW Careers Hub). This supports schools/colleges 'Careers Leaders' to embed the 8 Gatsby Benchmarks¹⁰ including increasing employer engagement, embedding careers into the curriculum, and informing students and parents of their options.
- **Using government funding to increase SME Interactions in our Secondary Schools and Colleges:** We will seek any available funding to effectively link Coventry's Small and Medium Employers to Coventry schools to help schools diversify their careers offer.
- **Building on our success in using adult skills provision to support residents into/back into work:** Working through Coventry Job Shop and its partners to promote skills offers that lead to good quality employment. Encouraging residents that 'it's never too late to learn', with adults taking advantage of the Government's 'Lifetime Skills Guarantee'.
- **Increasing the uptake of 'In Work' adult skills provision to drive upward mobility:**

⁹ [Coventry University Group 2030 Strategy](#)

¹⁰ [Information on the 8 Gatsby Benchmarks](#)

Ensuring skills providers have a flexible offer that can meet the needs of those in low paid work. Working with employers to increase skills training within working hours and effectively using any available 'in work' skills funding to drive upwards mobility.

3. Progression Pathways: Providing a clear line of sight for people to progress through Coventry’s skills system

Our Aim: Building clearly defined routes through all educational levels which lead into good quality employment. For residents to easily re-engage in the skills system once in employment; continuing 'lifelong learning' and increasing their earning potential and facilitating career development.

We will achieve this by:

- **Learners having clear line of sight of where courses can lead:** Learners seeing the value of continuing in education, achieving higher skills levels which can lead to higher paid work. We will work in partnership with employers, employer representative bodies and our Education and Skills Providers to develop pathways across different sectors.
- **Continue to encourage progression through 'lifelong learning' including adults who are 'In Work':** See chart below showing out of work and in work skills progression pathways:

Chart 1 - Out of work and in work skills progression pathways



4. Community: Developing a skills system which meets the needs of all residents and is widely accessed by all Coventry communities

Our Aim: Ensure all areas of the city are widely accessing skills support, at all levels and with good evidence of progression.

We will achieve this by:

- **Building on current community engagement success:** 2020-21 data from the Adult Education Budget (AEB) suggests good representation from wards with higher levels of deprivation with the two wards with highest representation being St Michaels (12%) and Foleshill (12%). We need to continue to ensure all Coventry's communities can access adult skills provision at all levels, focusing particularly on evidence of good progression to higher education levels and strong jobs outcomes for all groups.
- **Ensure skills system is supporting communities with the cost of living:** Ensuring the Coventry skills system supports residents into good quality work and to progress within the workplace. We especially need to focus on supporting women in low paid work as there is a larger pay gap between women and men in Coventry than the national average.¹¹ The skills system can also play a role in supporting residents to budget and understand financial systems which can help with cost of living pressures.
- **Embed findings Coventry Skills Survey 2021:** Our first ever citywide skills survey showed the main barriers to accessing adult skills provision are time restrictions (48% of respondents) and wanting more online courses (36%). We will support our Skills Providers to continue to make provision more flexible and work with partners to increase online provision and address digital poverty barriers. Course flexibility can especially support economically inactive women or women in low paid work who may have juggle caring responsibilities. The Skills Survey also showed adults find out about courses primarily online (61%) but face to face information is still key for many, especially those accessing the Coventry Job Shop (42%). We will encourage our Skills Providers to continue to strengthen their online presence and the quality of their online information, whilst continuing to promote skills provision through the Coventry Job Shop and other employment support providers.
A full report on the Coventry Skills Survey can be found in Appendix (C)
- **Continue to engage our residents through annual skills surveys and smaller feedback groups:** We will run our Skills Survey annually to continue to learn from our residents and adjust skills delivery and promotion accordingly. In addition, working with community partners to undertake regular community engagement activities.

5. Inclusion: A skills system which is fully inclusive and representative of our diverse City

Our Aim: Ensure all ethnic groups are well served by the skills system, ensuring engagement practices reflect our communities' needs and appropriate provision and support is available to enable full participation and progression at all educational levels.

We will achieve this by:

- **Continue to narrow the GCSE attainment gap for black students:** For 2019-20 GCSE results show that black students in Coventry were 0.6% below the average for all students on the attainment 8 measure (average of 8 GCSE results). This gap is lower than the national average of 1.3% but should continue to be addressed. We will work in a 'One Coventry' way across education, health, social services, Family Hubs and community

¹¹ Coventry gap between average weekly pay for full time male and female workers is £178. National average is £97.4. Source [Nomis](#) (ONS)

organisations to ensure that this gap continues to narrow, and Coventry continues to perform better than national averages.

- **Attainment gap for unaccompanied migrants and refugees:** We will work to ensure that these groups are provided with additional support to overcome barriers.
 - **Ensure adult skills provision maintains diversity with good progression for all groups:** For AEB provision in Coventry for 2020/21 - 21% of learners described themselves as from African, Caribbean, or other Black backgrounds and 16% from Asian backgrounds. We will build on this diversity in our provision whilst ensuring that all groups progress to higher levels and good sustainable employment.
 - **'In Work' provision to support more representation from ethnic minorities in senior leadership roles:** A report by Green Park in August 2021 showed for FTSE 100 companies only 11 of 295 (3.7%) leaders in the Top 3 roles have ethnic minority backgrounds.¹² Coventry City Council is showing leadership in addressing this with the 'Ignite' programme. This was a 6-month programme, which aimed to ignite the leadership potential in employees from Black, Asian, and Minority Ethnic backgrounds. The programme ran from September 2021 to March 2022 with a quarter of participants progressing to more senior roles following completion of the programme. In our City Council role as 'enabler' we will support other businesses to develop similar programmes.
- 6. Highest Needs: A skills system which supports those more in need, with a 'proportionate universalism' approach, helping people out of poverty and creating a more equal City.**

Our Aim: Concentrating proportionally higher levels of available resources to ensure Coventry's skills system is widely accessed by local areas of higher deprivation and demonstrates progression into good quality work - especially higher paying work. Strong participation will be pursued amongst those who may be considered higher needs due to disability, health/mental health conditions, drug/alcohol misuse, lone parents, teenage parents, ex-offenders and young people at risk of gang violence.

We will achieve this by:

- **'One Coventry' partnership working to support families with barriers that can impact educational attainment:** Coventry schools to help identify children and their families where there are concerns such as mental health issues, drug and alcohol misuse, homelessness, domestic violence and gang violence - working with their designated Early Help Assessment Co-ordinator through our Family Hubs to get the right support for children and their families.
- **Building on our success in supporting SEND learners to progress into paid employment:** Coventry has had highly successful Supported Internship programmes running for a number of years, with 60-80% of SEND learners progressing directly from education into employment with host employers including University Hospital Coventry and Warwickshire (UHCW) and Warwick University. We will continue to grow our Supported Internship programmes whilst exploring offer options to help SEND learners progress into meaningful paid employment.
- **Skills solutions which support adults with learning disabilities into work:** Building on the success of our supported Sector Work Academy Programme (SWAP) for adults with learning disabilities with 80% of learners progressing into paid employment with CV Life. This demonstrated the effectiveness of embedding a 'Supported Employment' approach within adult skills provision.

¹² [Green Park Annual Business Leaders Index 2021 This link doesn't work](#)

- **Using adult skills provision as a driver to reduce poverty:** Providing out of work residents with the right skills to meet the needs of the local labour market and move in to sustainable and well-paid employment. In addition, targeting skills provision at those in low paid and insecure work to address in work poverty and working with employers, trade bodies and unions to improve pay, workplace environments and opportunities.
 - **Ensuring adult skills provision is fully inclusive:** Supporting Adult Skills Providers to be inclusive in their course offers of residents who may be considered higher needs due to disability, health/mental health conditions, drug/alcohol misuse, lone parents, teenage parents, ex-offenders, and young people at risk of gang violence. Ensuring appropriate classroom and wraparound support and flexible course delivery to suit different learning needs.
- 7. Skills for Business: A skills system which provides the skills required by Coventry's businesses, both current and future and contributes to economic growth and the prosperity of the City**

Our Aim: Ensure Coventry businesses can find the skills to grow, including upskilling/reskilling existing workforces through in-work skills provision. Ensure Coventry has the skills base to attract inward investment. Maximise opportunities for residents to benefit from large developments such as the planned electric vehicle 'Battery Gigafactory'.

We will achieve this by:

Working together on our shared goals with the Coventry Economic Development Strategy: Further detail on Coventry Economic Development Strategy can be found in Appendix (A):

- **Getting the skills and opportunities right for investment:** Develop a 'team around' approach for investments and large developments with expertise brought together from across the Council to ensure early, comprehensive planning better meets business need and ensures maximum benefit for Coventry.
- **Co-designing skills solutions with businesses:** Designing together with industry and skills partners to ensure the skills system is responsive, innovative and produces the right skills mix for now and the future. This includes engaging with workplace unions and supporting employers to maximise social value commitments.
- **In-work upskilling with local employers:** Collaborations which encourage access to skills and workplace development at all levels.

In addition:

- **Supporting employers to see the skills potential of refugees and the wider migrant population:** Business engagement with targeted skills support to help overcome barriers and unlock a wider candidate pool.
- **Continuing to provide strong labour market intelligence (LMI) to Adult Skills Providers:** We will use and grow our existing networks which use EMSI labour market intelligence and other data to help Adult Skills Providers shape their delivery according to labour market need.
- **Increase SME awareness of available In-Work skills provision:** Working with partners such as Coventry and Warwickshire Chambers of Commerce (CW Chamber) and the Federation of Small Businesses (FSB) to better access In-Work skills funding including ESF (UKSPF) and Apprenticeship Levy Transfer. Holding joint events and webinars and gathering clear feedback from Small and Medium-sized Enterprises (SMEs) on their skills needs, especially more niche needs.

8. Social Value and Sustainability: A skills system which is well positioned to maximise increased commitment to social value and Coventry's commitment to tackling climate change

Our Aim: Aligned skills provision to support residents to capitalise on social value opportunities generated through Coventry City Council's new Social Value Strategy. Ensure skills provision is geared towards jobs growth created by sustainability actions including those linked to the Net Zero 2050 Plan.

We will achieve this by:

Ensuring skills provision supports Coventry's commitment to social value: Coventry City Council is committed to engaging with social value across the whole organisation, embedding in all threads of activity and leading partner organisations to take the same approach. This is detailed in Coventry's new Social Value and Sustainability Policy. We will ensure skills provision supports employers to meet their social value commitments, for example providing pre-employment training that helps an employer recruit local residents with the right skills or paying the 'real living wage' to address in work poverty.

- **Shape school and FE careers advice around emerging green skills needs:** Supporting Schools and FE Careers Leads to shape their advice around jobs growth in heat pumps, home retrofitting and EV vehicle production and maintenance. As well as opportunities more unique to Coventry such as our Battery Gigafactory and our Very Light Rail project.
- **Design adult skills provision around 'green' skills need:** Ensuring our Adult Skills Providers are able to provide the right courses to meet both current and future green skills need.
- **Shape In-work Skills provision to support reskilling of workers to the 'Green Economy':** Work with funders and our Skills Providers to ensure we have the right provision to support workers to reskill/upskill in sectors which will become obsolete i.e petrol and diesel mechanics, gas boiler engineers and petrol vehicle production operatives. Ensure provision is widely accessed.

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Appendix B: Arriving at the Priorities (Evidence Base)

1. Overall Skills Levels: Improve the overall skills levels of Coventry residents

Table 1: Overall Qualification Level Comparisons as of December 2021 (latest data available)¹

Measure	Coventry Score	UK Average	Comparison	WMCA Average	Comparison
No Qualifications	7.6%	6.6%	-1%	7.7%	+0.1%
NVQ1 and Above	84.9%	87.9%	-3%	84.9%	Same
NVQ2 and Above	76.5%	78.2%	-1.7%	75.2%	+1.3%
NVQ3 and Above	58.7%	61.5%	-2.8%	57.2%	+1.5%
NVQ4 and Above	40.4%	43.5%	-3.1%	38.8%	+1.6%

Table 1 shows that Coventry is performing well on overall skills levels compared to regional averages but there is a challenge to catch up with National Averages particularly around higher-level skills. This is significant considering employment demand trends; Working Futures estimates that (55.2%) of all jobs will require L4+ skills by 2027.²

To improve overall skills levels of Coventry residents we need to consider skills attainment through all stages of education - Primary, Secondary, Further and Adult Education:

Primary Performance

Table 2: Coventry Primary Performance Data³

Measure	Coventry Score	England Average	Comparison	WMCA Average	Comparison
% Pupils Meeting Expected Standard	62%	65%	-3%	62%	Same
% Achieving Higher than Expected Standard	7%	11%	-4%	9.28	-2.28
Reading Progress Score	-0.3	0	-0.3	-0.2	-0.1
Writing Progress Score	-0.4	0	-0.4	0	-0.4
Maths Progress Score	+0.1	0	+0.1	0	+0.1

¹ [Office for National Statistic - Nomis: Coventry Labour Market Profile](#)

² [Working Futures 2017-2027: Long-run labour market and skills projections Headline Report](#)

³ [Data from Gov.uk – 2019 data \(latest available\)](#)

Overall Coventry's primary schools perform well. 92.4% are rated as good or outstanding by Ofsted, which is the highest in the WMCA region. The number of pupils which met the expected levels is in line with the WMCA average and for Maths exceeds both WMCA and National averages. However, Coventry trails national averages for meeting expected levels and performs worse than both WMCA and National averages for reading and writing.

Secondary Performance

Table 3: Coventry Secondary Performance Data⁴

Measure	Coventry Score	England Average	Comparison	WMCA Average	Comparison
Educational Progress (KS2-KS4)	-0.12	-0.03	-0.09 ▼	-0.10	-0.02 ▼
Staying in Education or Employment (2017 leavers)	93%	94%	-1% ▼	93%	Same ◀
Grade 5 or above in Maths and English	38%	40%	-2% ▼	39%	-1% ▼
Achieving at least 1 qualification	97%	96%	+1% ▲	97.5%	-0.5% ▼

86.4% of Coventry secondary schools are rated good or outstanding which rates as second best in the WMCA region. Coventry is slightly below WMCA and National averages for educational progress and achieving Grade 5 (C) or above for Maths and English.

Coventry's overall good Ofsted performance suggests there are other factors to consider rather than just looking at quality of teaching or overall quality of primary and secondary schools themselves. Children from poorer families are less likely to meet or exceed expected educational levels. Analysis by Teach First found that; in 2019, 44.9% of disadvantaged pupils achieved a standard pass in GCSE English and maths, compared with 72.1% of non-disadvantaged pupils - an attainment gap of 27.2%⁵. For the West Midlands this is slightly lower at 25.8%.

A Joseph Rowntree Foundation report from March 2010 looked at the main factors that affect educational attainment for children from poorer backgrounds.⁶ For primary education these include home learning environment, parenting styles and rules, family interactions (i.e mother-child closeness) and the health and well-being of the child. Also, key are the aspirations of parents, and how far parents and children believe their own actions can affect their lives. For secondary education there is also; what parents can devote to material resources towards education - including private tuition, computer and internet access, time spent sharing family meals and outings; and that parents quarrel with their child relatively infrequently.















⁴ [Data from Gov.uk – 2019 data \(latest available\)](#)

⁵ [Teach First: 'Building a Better Future - Tackling the Attainment Gap in GCSE English and Maths'. August 2020'](#)

⁶ [Joseph Rowntree Foundation: 'Poorer Children's Educational Attainment, How Important are Parental Attitudes'. March 2010.](#)

Further Education Performance

Table 4: Further Education Performance⁷

Measure	Coventry Score	England Average	Comparison	WMCA Average	Comparison
Average Result	C	C+	- (+) 	C	Same 
Students Completing Main Study Programme	93.5%	91.3%	+ 2.2% 	92%	+1.5% 
Achieving AAB or higher, including at least 2 facilitating subjects	9.9%	14.1%	-4.2% 	11%	-1% 
Grade and points for a student's best 3 A levels	C+ 31.88	C+ 32.89	-1.01 	C+ 31.52	+ 0.36 
Students Progressing in to education or employment	81%	81%	Same 	80%	+1% 
Students Entering Apprenticeships	11%	10%	+1% 	10%	+1% 
Disadvantaged Students* Entering Apprenticeship	12%	10%	+2% 	10.5%	+1.5% 

Coventry has higher numbers than both WMCA and National averages for students completing main study programme with an average grade of 'C' - in line with the WMCA average, although trails the national average of 'C+'.

As with primary and secondary education to improve educational attainment in further education we need to look at wider issues than just quality of teaching within

Adult Education Performance

Adult Education data for the previous academic year (2020-21) shows high numbers of learners entering with either no qualifications or at entry level:

- 4500 learners (39%) enter with either no qualifications or only Entry Level qualifications.
- A further 1477 at Level 1 (13%)

In terms of learner enrolment:

- 1900 enrolled on LV1 courses (17%)
- 4300 enrolled on LV2 courses (38%)

This shows the vital role our Adult Education providers are playing in improving educational levels for adults in the City. However, as of December 2021 (latest data available) there were 19,100 adults in Coventry without any qualifications, an increase of 1500 on the previous year.

⁷ [Data from Gov.uk – 2019 data \(latest available\)](#)

21,100 Coventry residents were only qualified to LV1, this has decreased by 4000 on the previous year showing considerable success in residents gaining LV2 or above qualifications.⁸

Higher Education Performance

Coventry has 2 world class higher education institutions with over 55,000 students combined. Despite this Coventry trails National averages for residents qualified to NVQ4 and above. This can be attributed in part to higher skilled Coventry workers choosing to live outside the City in less urban areas, and commuting in. However, there is also an issue with graduate retention. A Centre for Cities study shows that Coventry retained 15 per cent of graduates in the 2014-2015 period, the fourth lowest among UK cities⁹. However almost a third of students in Coventry – 31 per cent – came from outside the UK and this should be factored in. Furthermore 42% of Coventry residents that progressed to university chose to study in Coventry which is 18th highest amongst UK Cities.

2. **Aspiration: An aspirational skills system that inspires residents to achieve through from primary school to lifelong learning**

Primary Aspiration

The Joseph Roundtree Foundation report highlights the key role parental aspirations have.¹⁰ The Skills Strategy highlights key actions, working in a One Coventry way to support parental aspirations for their children.

Secondary/Further Aspiration

Coventry secondary schools are making good progress in embedding the 8 Gatsby Benchmarks, with the number of schools meeting them increasing year on year. The 8 Gatsby

30 out of 33 of Coventry's schools and colleges (including special schools) are engaged with the Coventry and Warwickshire Careers Hub (CW Careers Hub). This is funded by the Careers and Enterprise Company working in partnership with Coventry and Warwickshire Local Enterprise Partnership (CWLEP) and Think Higher. The CW Careers Hub supports school's 'Careers Leaders' to create a high-quality careers plan that will increase employer engagement, embed careers into the curriculum and inform students and parents of their options.

There is also the ESF funded Coventry and Warwickshire; 'Collaborate to Train' project, a partnership between WCG (formerly Warwickshire College Group), Coventry City Council Job Shop, Coventry College, Coventry University and Solihull College & University Centre. The project helps small and medium enterprises (SMEs) access the right training to support the future of their businesses including; accessing apprenticeships, work experience placements, supported internships and advising on effective school engagement. The project has now entered its second phase after the first phase supported over 400 SME's.

Coventry University have advised that they are currently revising their 'Access and Participation' plan. This will lead to increased engagement with schools which will support with building aspiration amongst pupils and their parents.

⁸ [Office for National Statistic - Nomis: Coventry Labour Market Profile](#)

⁹ [Centre for Cities: 'The great British brain drain: an analysis of migration to and from Coventry'. October 2017.](#)

¹⁰ [Joseph Rowntree Foundation: 'Poorer Children's Educational Attainment, How Important are Parental Attitudes'. March 2010.](#)

Adult Education

Adults out of work can be supported by Coventry Job Shop working with public sector and community partners to promote skills offers that lead to good quality employment. This includes Sector Work Academy Programmes (SWAPs), which are continuing to increase in the City. These are short 2-8 week courses co-designed with employers, providing learners with the skills required by the host employer(s) as well as work experience and a guaranteed interview at the end of the course. Also, of great importance are apprenticeships, which are now funded for all ages. Apprenticeship data from 2019/20 shows 52% of apprenticeship starts in Coventry were for those over the age of 25.

For adults in work, in addition to supporting Skills Providers to offer flexible provision that can fit around work commitments, there is also ESF funded programmes: Skills Support for the Workforce (SSW) and Skills 4 Growth (S4G). Serco have the contract for SSW in Coventry providing a range of skills courses targeted at individuals in low paid work. Since 2016 it has provided over 2200 in work skills courses, the majority (1900) at Level 2. S4G is led by Coventry City Council and provides targeted skills funding for SME businesses across Coventry and Warwickshire with 50% funding for any level of accredited course. This enables upskilling of workforces which provides more entry level opportunities as existing employee's progress. Finally, Apprenticeship Levy can be used to upskill workforces of larger employers. Coventry City Council is leading in this, with over 450 employed apprentices undertaking over 65 different types of apprenticeship. This has been supported by workforce planning sessions mapping career pathways, utilising apprenticeships to address current and future predicted skills shortages.

3. Progression Pathways: Clearly built in throughout Coventry's skills system

As our largest provider of both FE and Adult Education - Coventry College acknowledge in their 2021-24 Strategic Development Plan that traditionally, too many learners exiting the college at LV1 and 2 didn't progress to higher levels. Their Strategic Development plan looks to address this. In addition, they plan to increase numbers progressing from Coventry College to higher education. Currently 7.2% of Coventry College provision is 'Access to Higher Education' and the strategy plans to increase this by 2024.

4. Community: A skills system which meets the needs of all residents and is widely accessed by all Coventry communities

Data from last academic year (2020/21) suggests Adult Education delivery in Coventry is doing reasonably well in serving Coventry's communities. Wards with higher levels of deprivation have higher volumes of learners such as St Michaels (12%) and Foleshill (12%). However, there could still be community groups and areas of the City that are under-represented and we need to continue to ensure our Skills Providers have good reach across the City.

5. Inclusion: A skills system which is fully inclusive and representative of our diverse City

Coventry continues to welcome large proportions of refugees. Between 2019 and 2020 Coventry saw the second highest number of international arrivals after Birmingham. This contributed to Coventry in 2020 (latest data available) having the highest percentage of foreign-born residents in the region – 25.9%.¹¹ Currently, Coventry has around 1500 asylum seekers. This is three times the number of asylum seekers Coventry had at end of 2019/ beginning of 2020.

¹¹ [ONS Local Migration Indicators 2017](#)

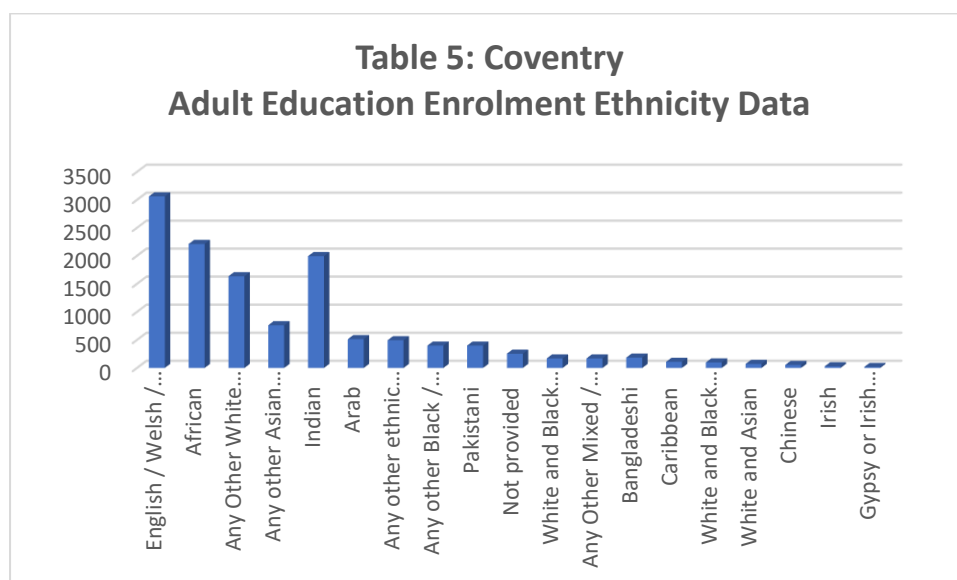
Secondary/Further Education

For 2019-2020 GCSE results, Black young people in Coventry scored lower than the overall average on the attainment 8 (average of 8 GCSE results) score – with a score of 47.1. The gap between this score and the average is only 0.9% and is equal to the national average gap. However, compared to the previous year, the gap has widened by 0.3% in Coventry whereas nationally it has decreased by 0.4%. Coventry performs better for mixed raced young people with scores 0.7% higher than the average. This is a large improvement from the last academic year in which scores were 2.3% below average. Asian students performed well above the average.

Comparative data is not available for further education at Local Authority level but national data suggest that far few students from black backgrounds go on to achieve 3 A Levels.¹²

Adult Education

Data from the academic year (2020/21) suggests Adult Education delivery in Coventry is doing reasonably well in serving Coventry's ethnic minorities. 21% of learners described themselves as from African, Caribbean, or other Black backgrounds. 16% as from Asian backgrounds. This is shown below in table 5:



However, we need to consider learner experiences particularly how different ethnic groups progress and achieve.

6. Highest Needs: A skills system which supports those most in need, supports people out of poverty and helps create a more equal City.

Disability

There are many adults in Coventry with learning disabilities and other disabilities who are not in employment, for all adults with disabilities the ONS estimates around 53.6% are in employment but for those with learning disabilities only between 19-34%.¹³ However, for those

¹² [Gov.UK: Commission on Race and Ethnic Disparities, Independent Report](#)

¹³ [ONS: Outcomes for disabled people in the UK - 2020](#)

with learning disabilities who receive a service from Adult Social Care this decreases to around 5.6%, with the West Midlands having the lowest rates at 3.2%.¹⁴

Poverty

Coventry had very low levels of unemployment with 3% of 16-64 year olds claiming out of work benefits in February 2020. This increased significantly due to the pandemic but is decreasing month on month and is now at 4.7%. Despite this there are still significant areas of economic deprivation the City. The 2019 IMD report showed Coventry still ranks as the 64 most deprived out of 317 Local Authority areas. This suggests that there are issues with in-work poverty, which is also something local support agencies - Coventry Citizens Advice and Coventry Independent Advice Service are reporting. December 2021 data for DWP Mercia District (Coventry and Warwickshire) shows the highest proportion of in work Universal Credit claimants in the region at 41% compared to a regional average of 39%. There is a larger gender gap between female and male pay in the City than most of the UK. The gap in gross weekly pay is £172 compared to the national average of £97 and the West Midlands average of £102.

Other Barriers

Alcohol/Substance misuse: Coventry has the highest levels of alcohol hospital admissions in the WMCA with 2976 per 100,000 compared to a WMCA average of 1999 per 100,000. Coventry also has high rates of Alcohol dependency with 18.8 residents per 1000 struggling with alcohol dependency compared to a UK average of 13.7 per 1000. Coventry also has high rates of 15-24 substance misuse hospital admissions which are the 2nd highest in WMCA at 199 per 100,000 compared to the WMCA average of 190 per 100,000.¹⁵

Victims of domestic violence: Domestic violence crime rates are only reported regionally, but the West Midlands has a comparatively high rate with 37.27 per 1000 crimes which is higher than Greater Manchester at 34.25 and London at 35.14. In 2019 15% of the 350 families supported by Coventry City Council for homelessness were victims of domestic violence, with the actual number likely to be higher as women who are victims of domestic violence often stay with wider family before seeking support from statutory services.¹⁶

Homelessness- Coventry City Council supported 340 families who had been made homeless in 2019 compared to 40 in 2015. Rising rents and increased bills from the current cost of living crisis are likely to see this rise continue. ¹⁷

Ex Offenders- Coventry has slightly lower crime rates than the WMCA average and lower rates for youth offending with 16.79. 17 year olds per 1000 entering the youth justice system compared to a WMCA average of 17.67.¹⁸

7. Skills for business: A skills system which provides the skills required by Coventry's businesses, both current and future and contributes to economic growth and the prosperity of the City

The Federation of Small Businesses (FSB) 'Small Business Confidence Survey' from December 2021 reports 39% of SME's in the West Midlands believe access to the right staff is holding them back and close to a quarter state challenges finding individuals with the right

¹⁴ [BASE: Employment Rates Rates for People with Disabilities 2020-21](#)

¹⁵ [CCC Citywide Intelligence](#)

¹⁶ [CCC Citywide Intelligence](#)

¹⁷ [CCC Citywide Intelligence](#)

¹⁸ [CCC Citywide Intelligence](#)

skills in their area. A similar proportion say hiring is a struggle because they require individuals with niche skill sets.¹⁹

8. Social Value and Sustainability: A skills system which is well positioned to maximise increased commitment to social value and Coventry's commitment to tackling climate change

The Government's Net Zero Strategy, October 2021 formalises plans to ensure the UK is fully carbon neutral by 2050 with plans to create up to 440,000 jobs. A proportion of these will involve re-skilling existing workers from carbon intensive industries but there will also be a need to train new people.

The areas of opportunity for Coventry are set out below with actions to both re-skill existing workers and train new people to benefit from new 'green' jobs.

-Heat and Buildings (Heat Pumps and Retro-fitting): All new heating appliances installed in homes by 2035 to be either electric heat pumps or hydrogen boilers. This in combination with continued plans to better insulate homes, will create 100,000 jobs in the middle of the 2020s and up to 175,000 by 2030.

Traditional gas boiler engineers will steadily see their skills become obsolete, therefore a large proportion of the 100,000 jobs will involve retraining. There will also be a requirement for FE colleges and other skills providers to reshape their curriculum away from training traditional gas boiler engineers and into training heat pump or hydrogen boiler engineers.

Transport (EV vehicle production and maintenance): The Government's 'zero emission vehicle mandate' bans the sale of new petrol or diesel cars by 2030. In addition, there is £620 million of funding for zero emission grants and electric vehicle (EV) infrastructure and a £1 billion Automotive Transformation Fund. Combined these measures plan to create 22,000 jobs by 2024 and 74,000 by 2030.

Coventry is uniquely positioned to benefit from jobs growth in 'green' transportation. Coventry already has the largest number of electric vehicle (EV) charging points outside of London²⁰ and has the UK Battery Industrialisation Centre (UKBIC), which employs over 100 people in high skilled roles. There are plans to build a Battery Gigafactory which will put Coventry at the heart of the UK's EV industry and create over 4000 jobs locally.

¹⁹ [FSB: West Midlands SBI 2021 Q2 Report](#)

²⁰ [Guardian Article- August 2021](#)

Appendix C: Skills Survey Results and Analysis

Section 1: Profile of respondents



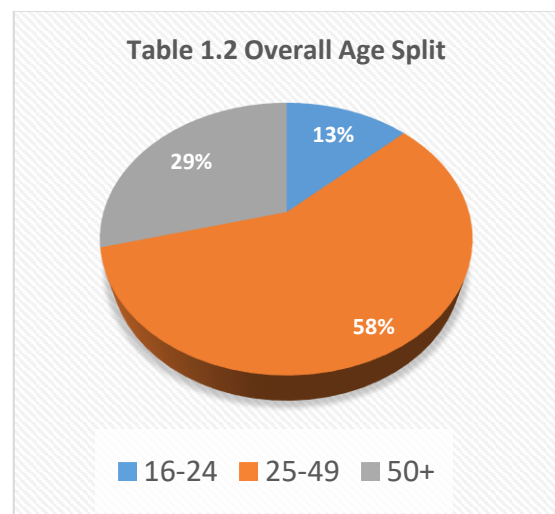
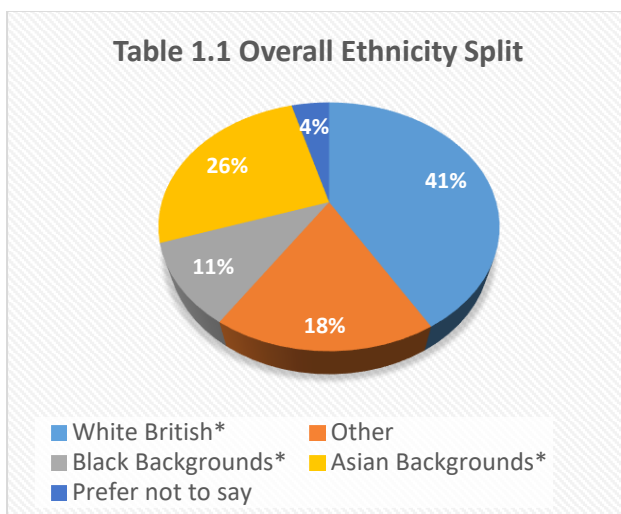
Completed by 259 people



37% Male and 62% Female



11% declared a disability



Section 2: Key Findings and Overall Conclusions

Why adults engage in skills courses:

The survey only asked about 'most recent qualification' which will not capture all reasons respondents may have engaged with adult skills courses. This will be addressed in future surveys. In addition, for younger respondents their 'most recent qualification' may have been statutory education. There was also not the option of 'to gain skills for work' which may have affected the results.

Taken into account these limitations, we can learn:

- **Personal development:** High numbers of adults take courses for personal development – wanting to 'learn something new' (27.8%) or to 'gain confidence' (18.5%).
- **Hobbies:** Undertaking courses for 'hobbies and interests' is still important for many with 11.3% of overall respondents and 25% for respondents with a declared disability. However only 2.4% of respondents from Asian Backgrounds* selected this option and also lower proportions of the 25-49 year old age group (8.3%).

*Black Backgrounds includes – Mixed White and Black Caribbean, Black/African, Caribbean Black or Black British Caribbean, Black or Black British, Black African Other, Mixed White and Black African

*Asian Backgrounds includes - Asian or Asian British Chinese Asian, Asian British Bangladeshi, Asian or Asian British Pakistani, Asian or Asian British Indian, Mixed White and Asian

* White British includes - White English, Welsh, Scottish, Northern Irish or British

- **Career Change:** Selected by 10.3% overall respondents with higher proportions of White British* respondents (12.3%) and 24-49 year olds (12.6%). No 16-24 year olds selected this option.

How to promote skills courses:

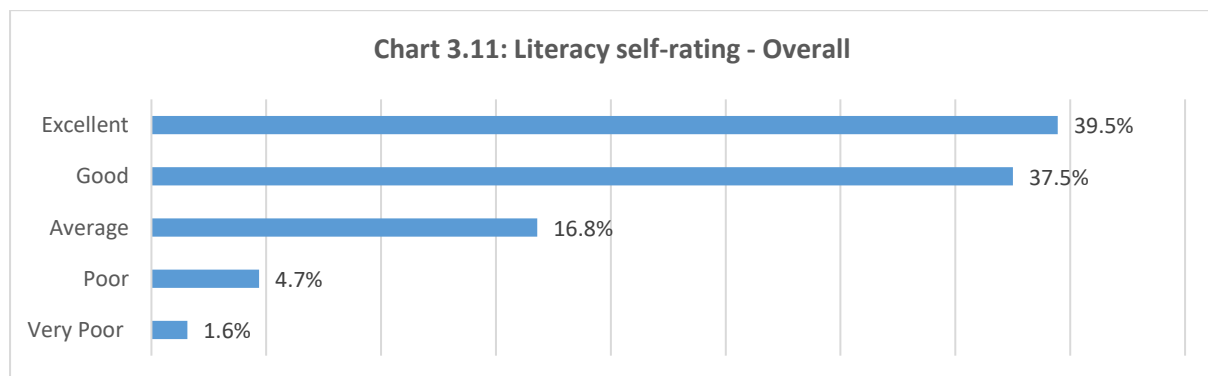
- **Online:** Good online information is key with 60.6% of respondents finding they found out about courses this way.
- **Face to Face:** Still important for many, especially the Job Shop with 41.5% stating they would use the Job Shop to find out about skills courses.
- **Younger people favoured Face to Face:** Lower proportions of 16-24 year olds said they would find out about courses online (42.1%) with higher proportions from this age group selecting the Job Shop (54.5%) and Job Centre plus (33.3%- compared with only 10.49% of 25-49 year olds and 13.7% of those who were 50+).

How to remove barriers:

- **Flexible course provision:** 47.6% of survey respondents stated that ‘time’ was a barrier to accessing skills courses, with this rising to 48.3% of 25-49 year olds and 58.7% of White British* respondents. 49.6% of survey respondents stated that ‘more flexible course solutions’ would remove barriers for them. Comments from survey respondents included; ‘more evening courses’, ‘more weekend courses’ and ‘being able to do courses flexibly in my own time’.
- **Address concerns around fees:** 41.9% of survey respondents stated that ‘low/no fees’ would support them to access more courses with this rising to 49.2% of respondents from Asian Backgrounds*. This could be reflective of the high percentage of respondents who were ‘employed full time’ (58.9%), as the majority of those who are out of work can access courses for free, as can many who are in low paid work. This may also relate to respondents needing ‘better information on courses’ as it may be that some are not aware of what they can access for free, for a low fee or options to use the student loans system.
- **Increase online provision:** 37.8% of survey respondents wanted more online courses. However, when asked how they preferred to learn 54.5% wanted ‘blended’ learning with only 22.2% opting for solely online.
- **Childcare:** 21.5% of survey respondents stated childcare was a barrier with most of these being respondents from Asian Backgrounds*.

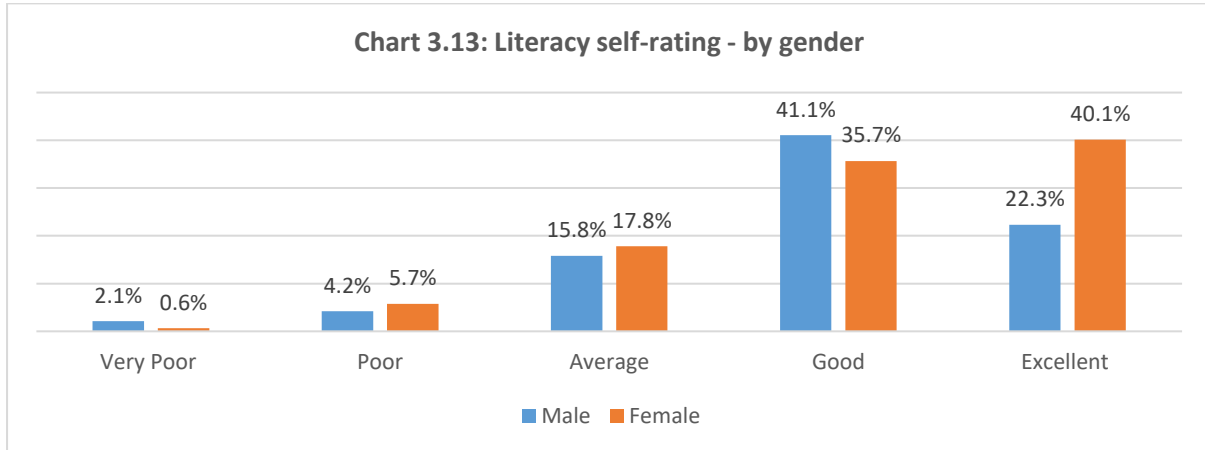
Section 3: Learning levels and employment status of respondents

3.1 Literacy self-rating – overall: The majority of respondents rated their literacy as either excellent or good (77%):

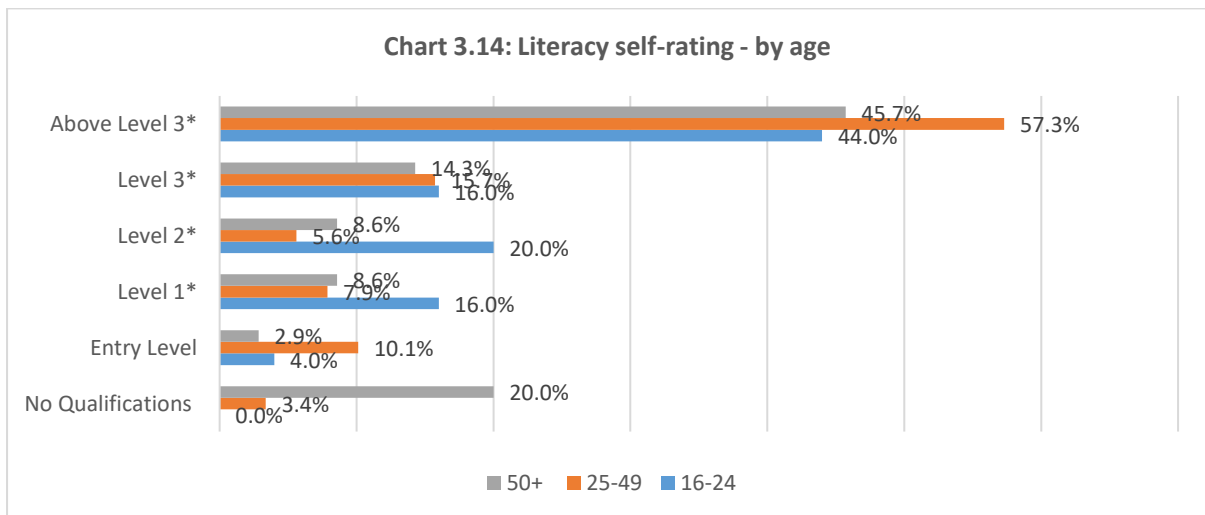


3.12 Literacy self-rating for respondents with a declared disability: For respondents with a declared disability the pattern of responses is broadly the same as in Table 3.11.

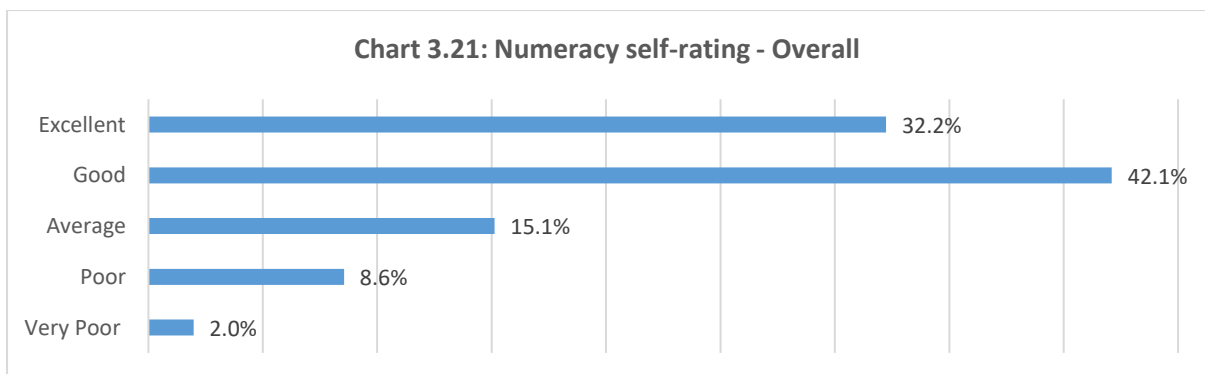
3.13 Literacy self-rating by gender: A much higher percentage of female respondents rated their literacy as ‘excellent’ than males:



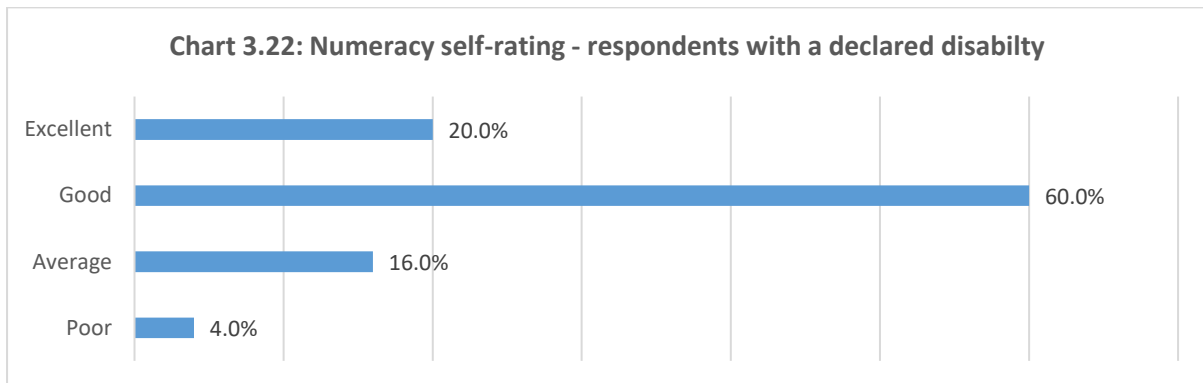
3.14 Literacy self-rating by age: Significantly lower numbers of 18-24 year old respondents rated their literacy as ‘excellent’ with 76% in this age category instead opting for ‘average’ and ‘good’:



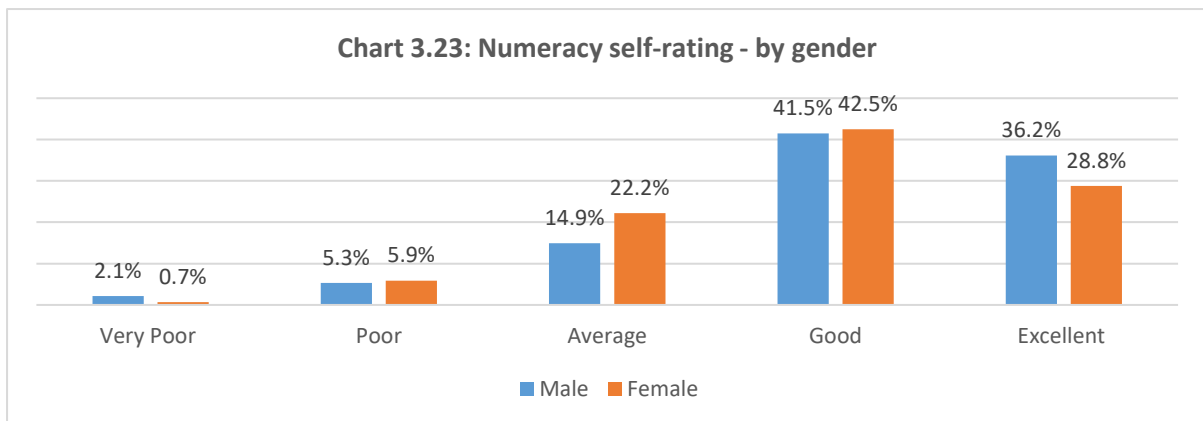
3.21 Numeracy self-rating: Overall, most respondents (74%) rated their numeracy as either ‘excellent’ or ‘good’. This is a lower % than for literacy (77%) and also far fewer rated their numeracy skills as ‘excellent’ – ‘32.2%’ compared with ‘39.5%’ for numeracy:



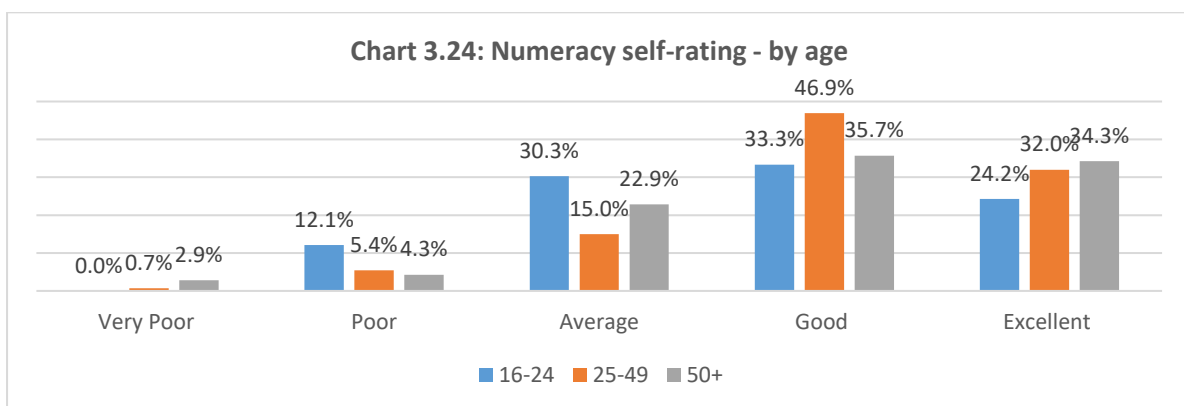
3.22 Numeracy self-rating for respondents with a declared disability: A far higher proportion of respondents with a declared disability rated their numeracy as ‘good’, although less rated their numeracy as ‘excellent’:



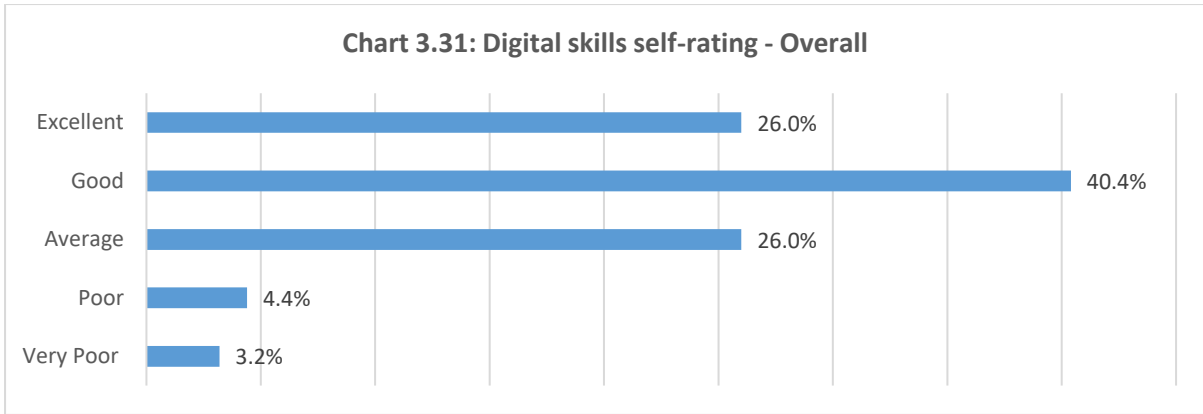
3.23 Numeracy self-rating by gender: A lower percentage of female respondents rated their numeracy as ‘excellent’ than male respondents. This contrasts with literacy self-rating which showed the reverse:



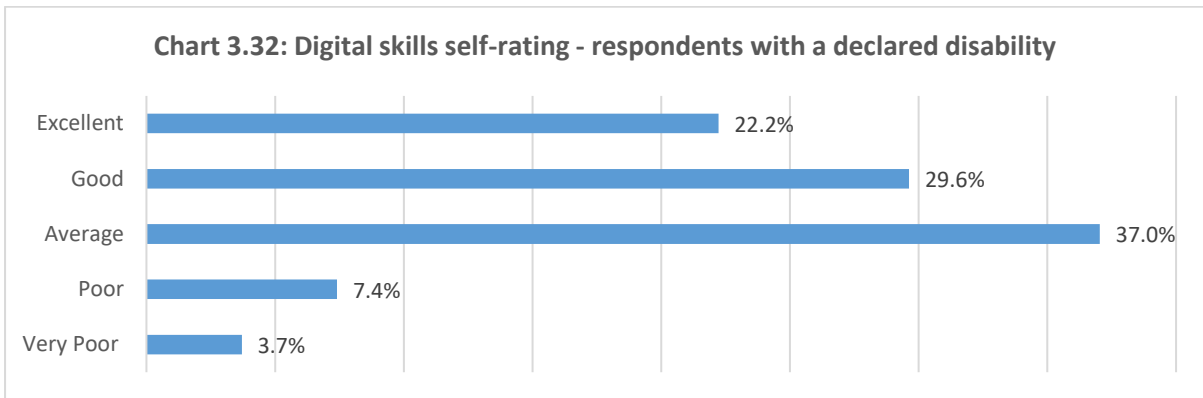
3.24 Numeracy self-rating by age: Higher proportions of young people (16-24) rated their numeracy as either ‘poor’ or ‘average’ – 40.4% compared with 20.4% of 25-49 year olds and 27.3% of those who are 50+. The 25-49 year old group rated their numeracy the highest with 78.9% rating themselves as ‘good’ or ‘excellent’:



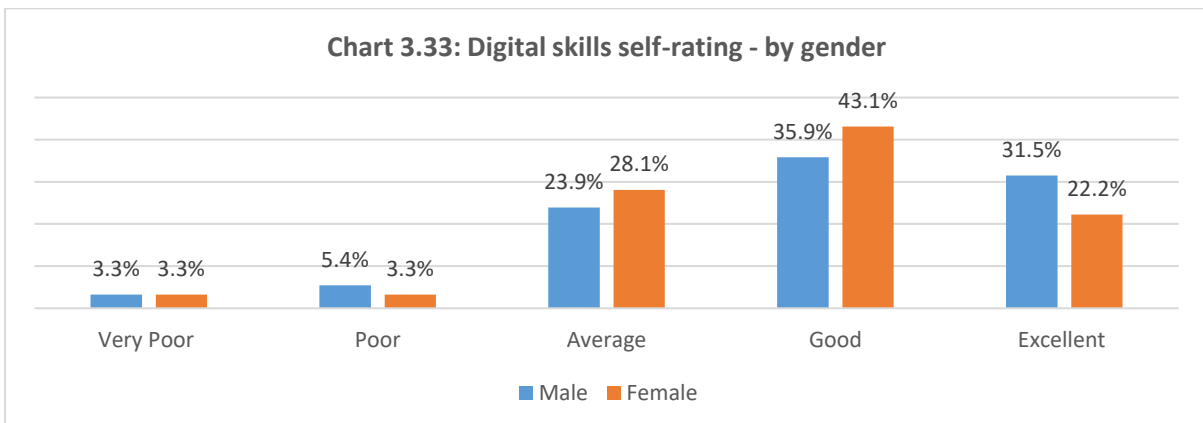
3.3 Digital skills self-rating: Overall, 66% of respondents rated their digital skills as either ‘good’ or ‘excellent’. This is lower than both the self-rating for numeracy and literacy:



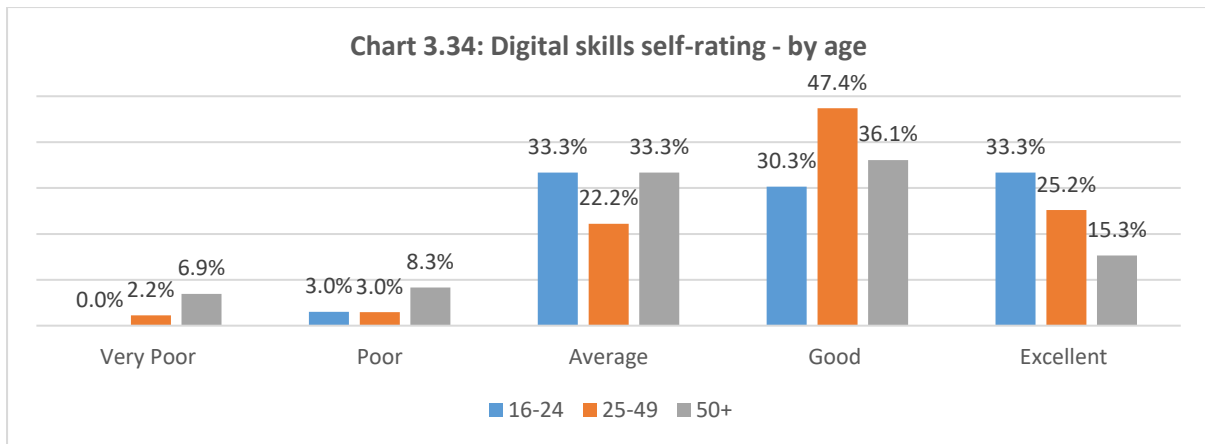
3.32 Digital skills self-rating for respondents with a declared disability: For respondents with a declared disability a lower percentage rated their digital skills as either ‘excellent’ or ‘good’ with a higher percentage opting for ‘average’:



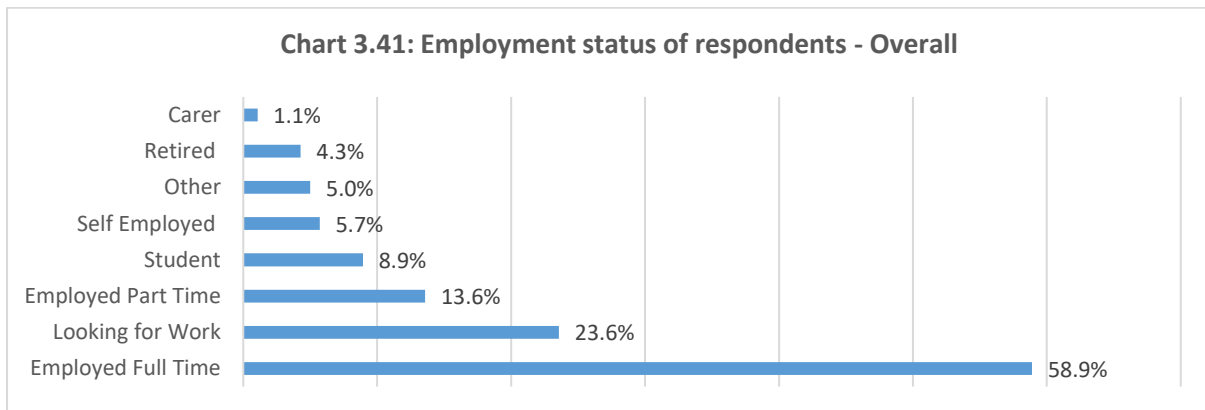
3.33 Digital skills self-rating by gender: A higher proportions of male respondents rated their digital skills as ‘excellent’, although when combining ‘good’ and ‘excellent’ male and female self-ratings are nearly inline:



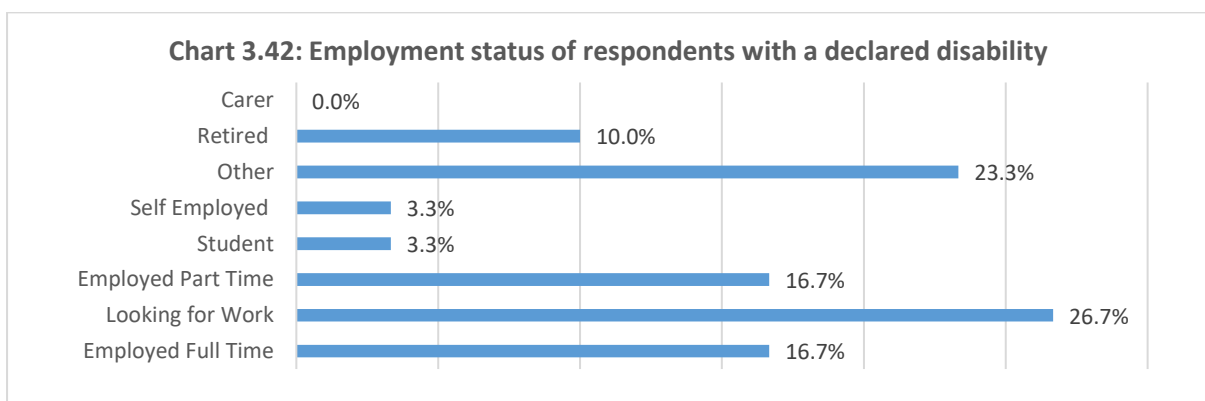
3.34 Digital skills self-rating by age: Significantly lower proportions of respondents who are 50+ rated their digital skills as either ‘good’ or excellent’ with a combined total of 50.4% compared to 67.6% of 25-49 year olds and 63.6% of 16-24 year olds:



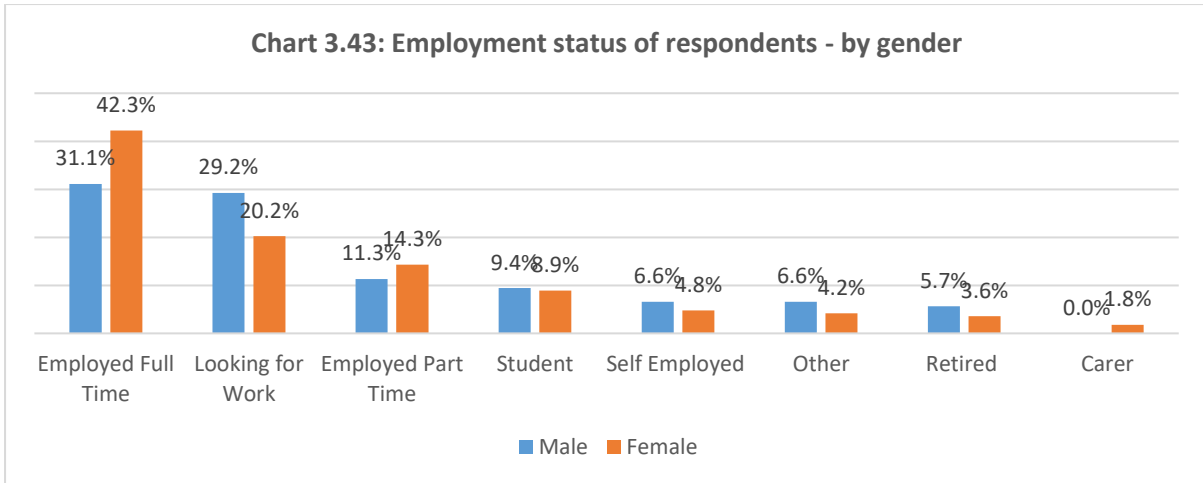
3.41 Employment status of respondents – overall: The majority of respondents (58.9%) were employed full time. However, a significant proportion were either looking for work or employed part time – combined this makes up 37.2% of responses:



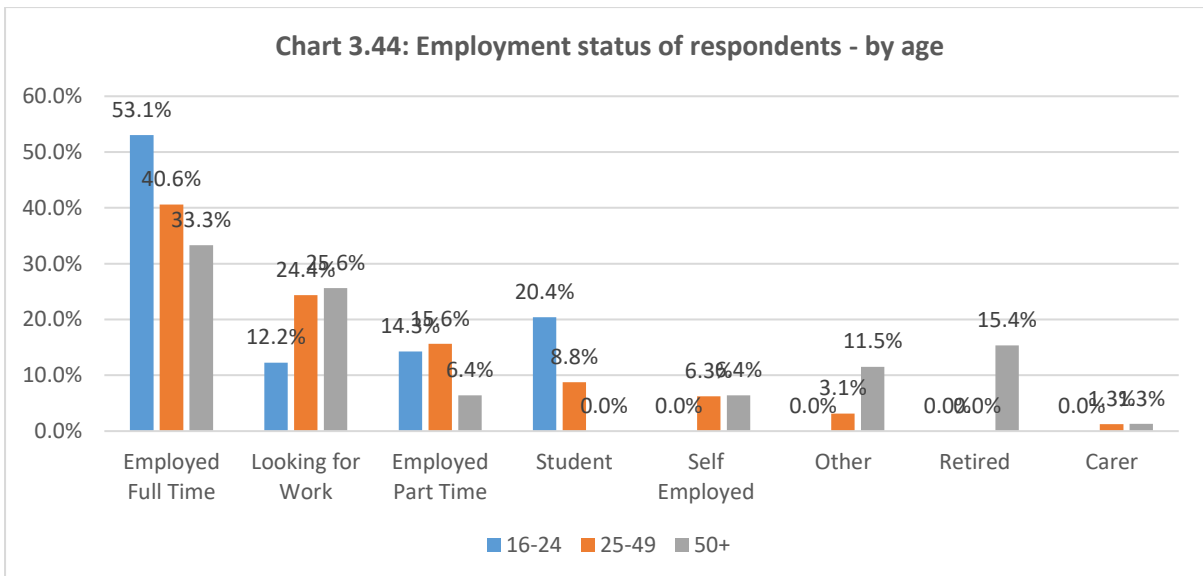
3.42 Employment status of respondents with a declared disability: Far fewer respondents with a declared disability were ‘employed full time’. Slightly higher proportions were ‘employed part time’ and ‘looking for work’:



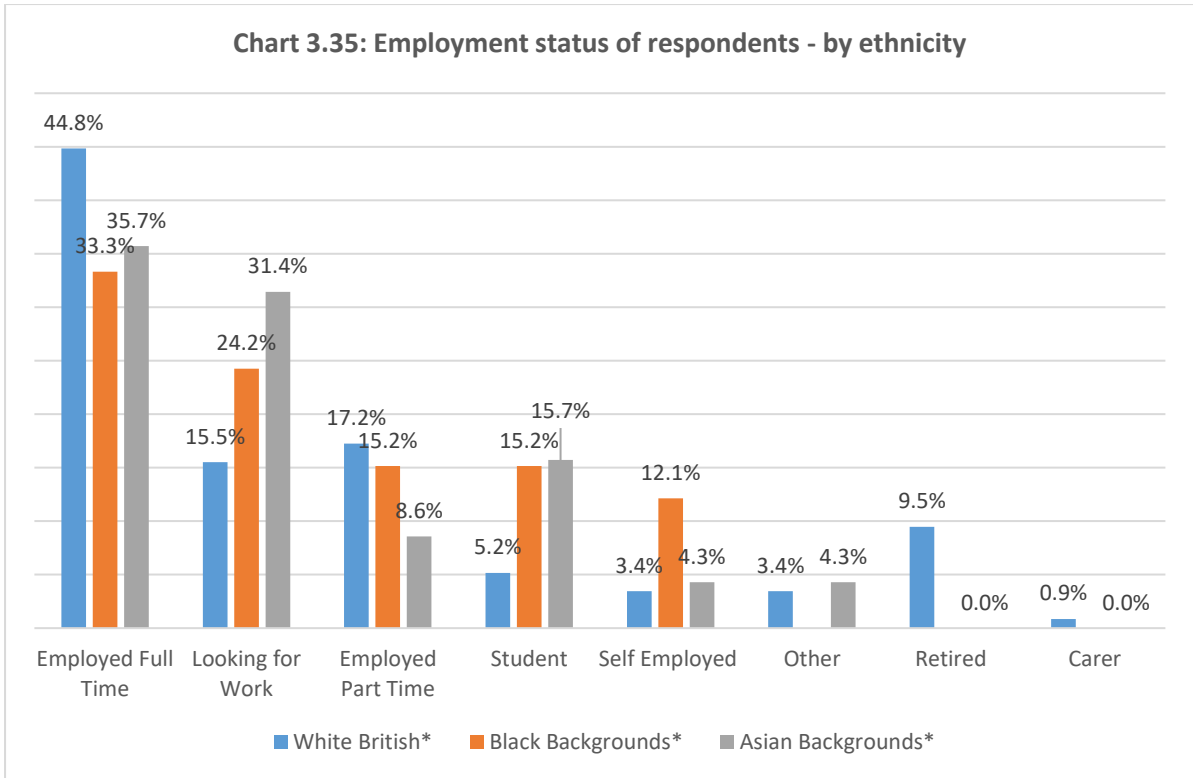
3.43 Employment status of respondents by gender: A lower proportion of male respondents were in full time work, with a higher proportion ‘looking for work’:



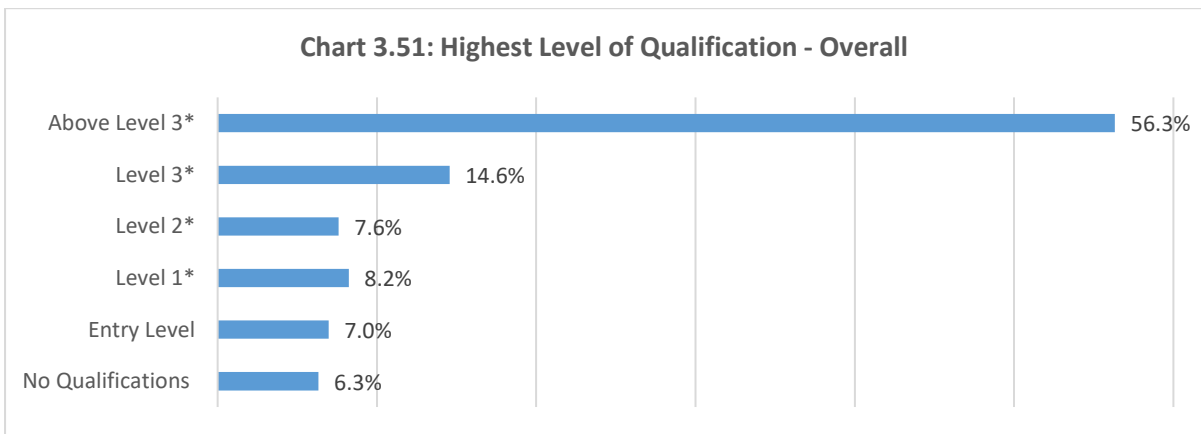
3.44 Employment status of respondents by age: Significantly more 16-24 year old respondents were 'employed full time' with a higher proportion of those who were 50+ 'looking for work':



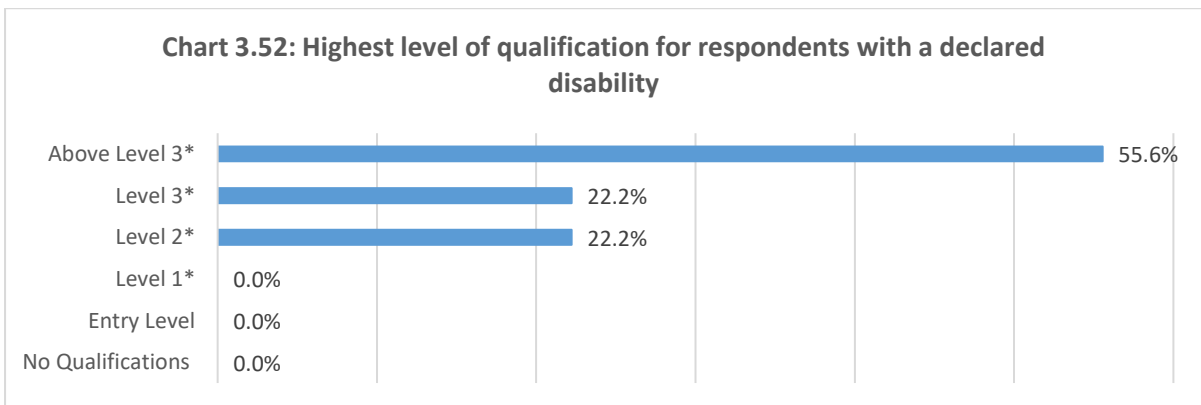
3.35 Employment status of respondents by ethnicity: A higher proportion of White British* respondents were 'employed full time' and also 'employed part time'. Respondents from Asian Backgrounds* were the most likely to be 'looking for work':



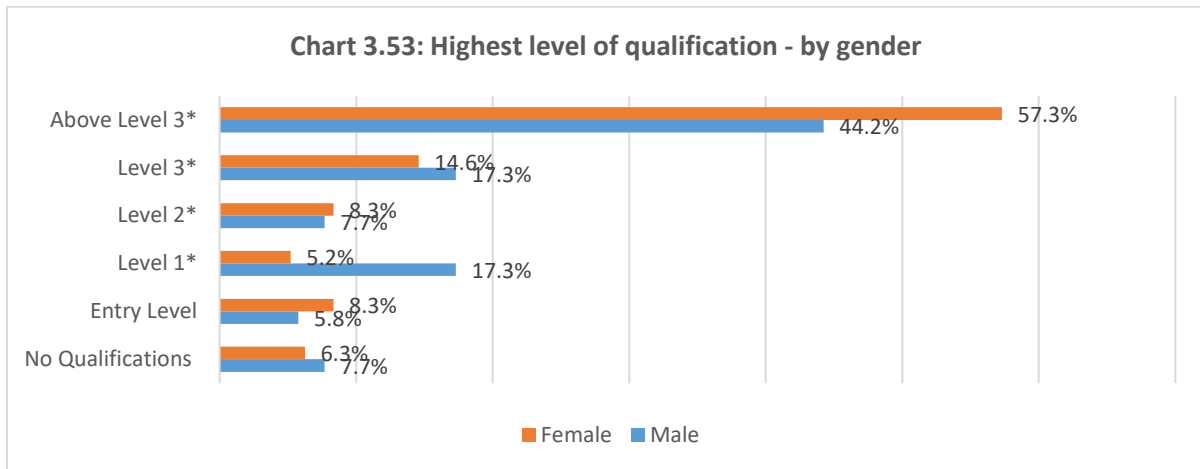
3.5 Highest Level Qualification – Overall, the majority of respondents were qualified to above Level 3. However, a significant proportion (21.5%) were below Level 2 (GCSE Grades A-C/9-4):



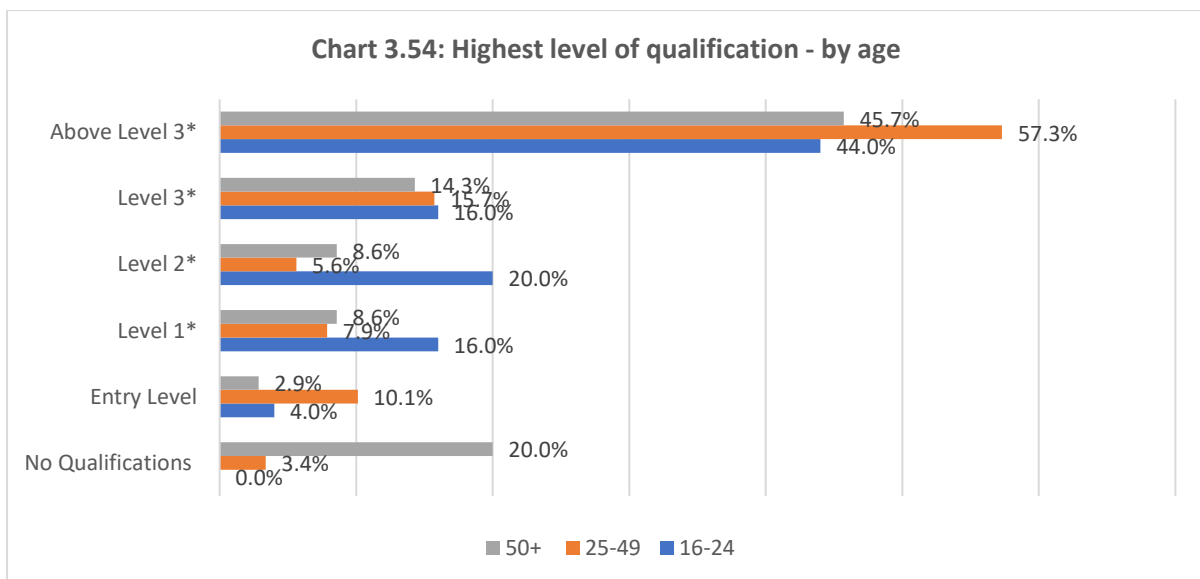
3.52 Highest level of qualification for respondents with a declared disability: No respondents with a declared disability were qualified below Level 2:



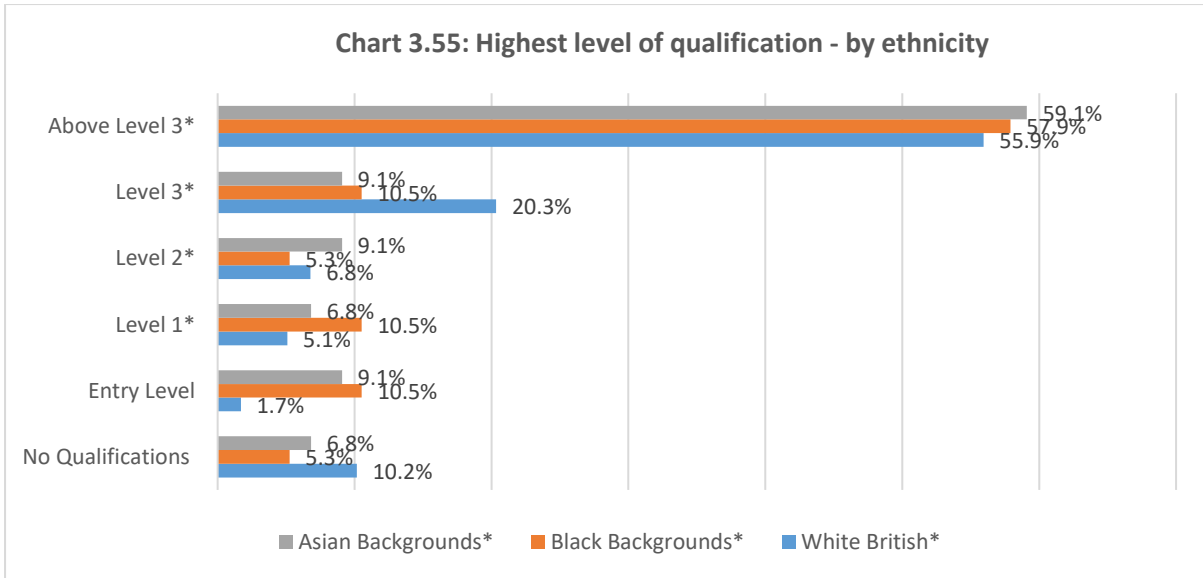
3.53 Highest level of qualification by gender: A higher proportion of female respondents were qualified to above Level 3 with higher proportions of male respondents being below Level 2:



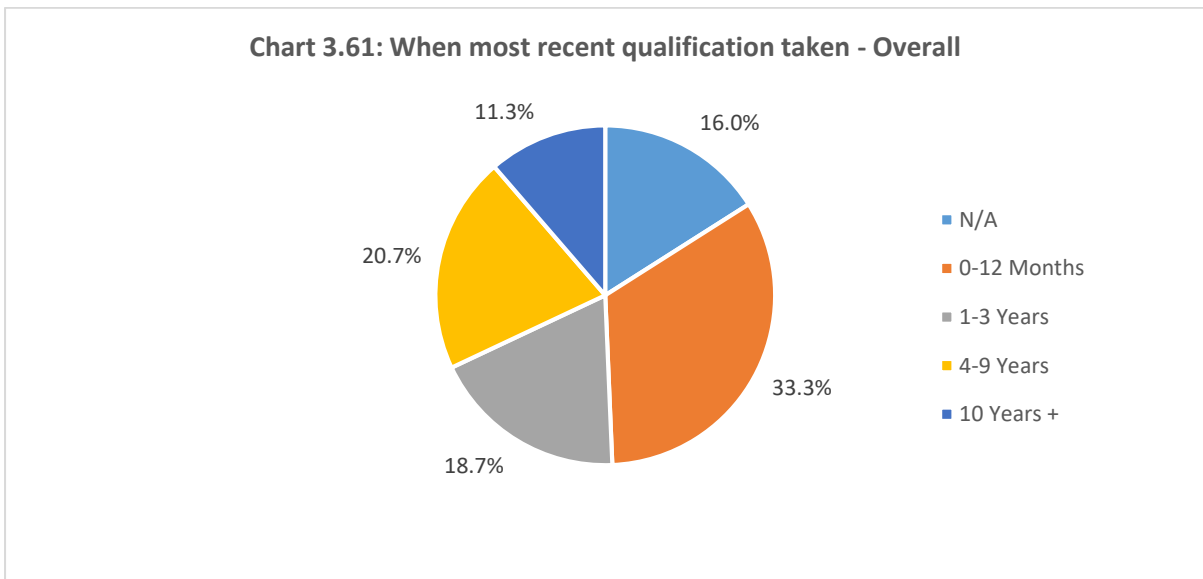
3.54 Highest level of qualification by age: A higher proportion of 25-49 year old respondents were qualified to above Level 3, although it should be noted that some of those in the 16-24 year old category would not have reached an age where it is possible to achieve above Level 3. Significantly higher proportions of the 50+ group had no qualifications:



3.55 Highest level of qualification by ethnicity: Respondents from Asian Backgrounds* proportionality were most likely to be qualified to above Level 3, although taken together with those qualified to Level 3, White British* respondents were the highest qualified overall with 76.2% qualified to Level 3 or above:

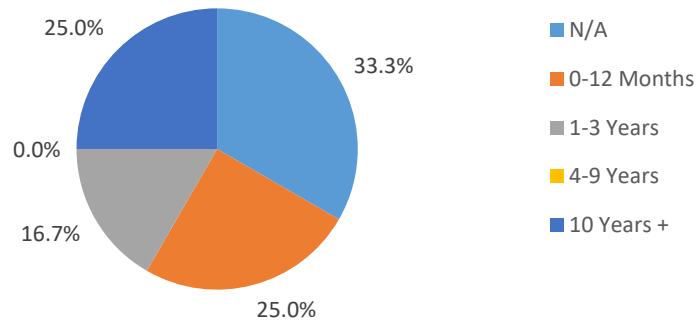


3.6 When most recent qualification was taken - The majority of respondents (52%) have taken their most recent qualification within the last 3 years, with 33.3% having taken a qualification within the last 12 months:



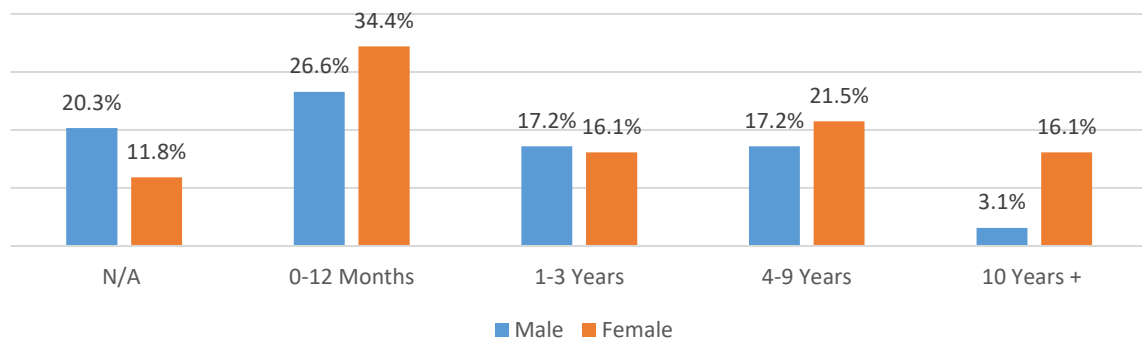
3.62 When most recent qualification taken - respondents with a declared disability: Higher proportions either answered 'NA' or that their last qualification was undertaken 10 or more years ago:

Chart 3.62: When most recent qualification taken - respondents with a declared disability

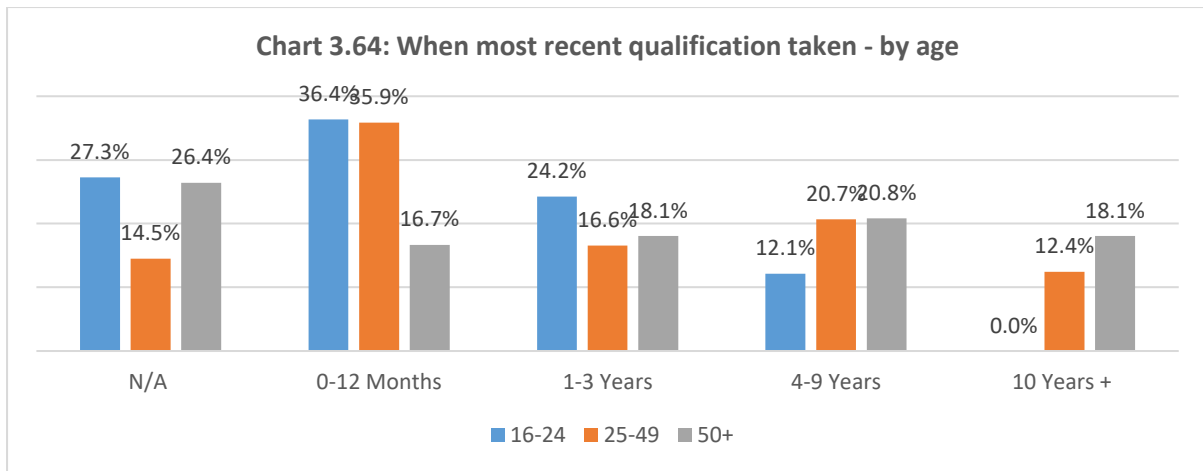


3.63 When most recent qualification taken – by gender: More female respondents have taken their most recent qualification in the last 12 months although there were also a large group of female respondents who took their last qualification more than 10 years ago.

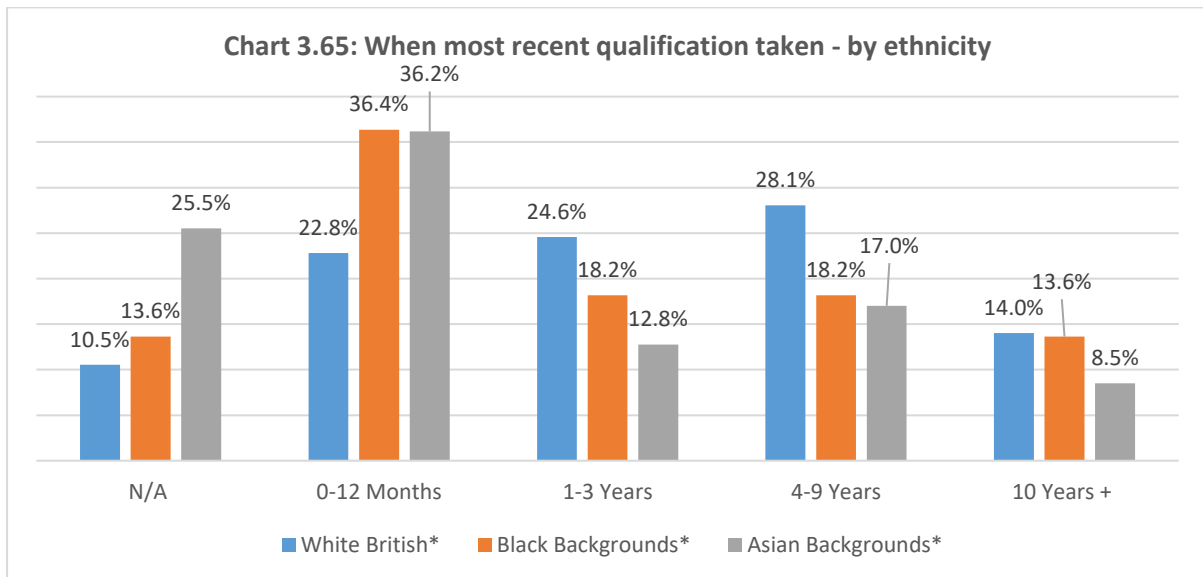
Chart 3.63: When most recent qualification taken - by gender



3.64 When most recent qualification taken – by age: Respondents who were 50+ were least likely to have taken a recent qualification. Understandably, 16-24 year olds were most likely to have taken a recent qualification, which is reflective of those within this age category who would have recently left statutory education (or still be within statutory education). However, a large percentage of 16-24 year olds selected N/A despite non from this age category stating they had ‘no qualifications’ on the previous question. This suggests some 16-24 decided not to include their statutory education for this question and took the question to mean any qualifications gained since leaving statutory education:



3.65 When most recent qualification taken - by ethnicity: Higher proportions of respondents from Black Backgrounds* and Asian Backgrounds* had taken a course in the last 12 months compared with respondents who were White British*. A high proportion of the White British* respondents had taken their last course 4 or more years ago.



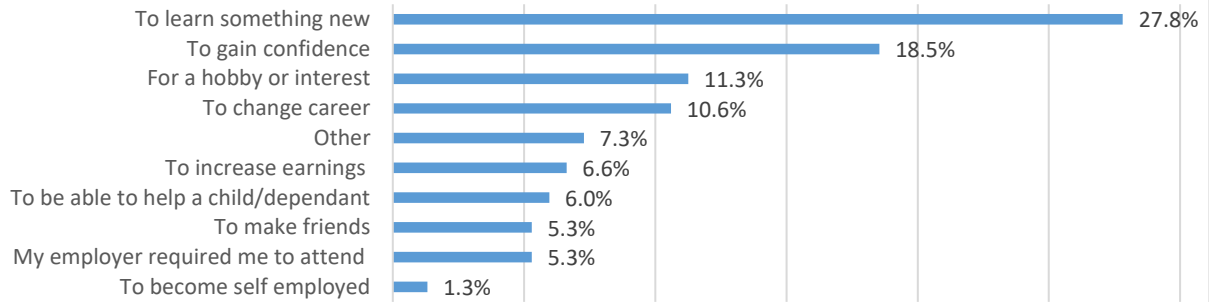
Section 4: Analysis of Individual Questions

Note questions 1-4 responses are contained in Section 3.

Question 5: Why did you take you most recent qualification (tick all that apply)

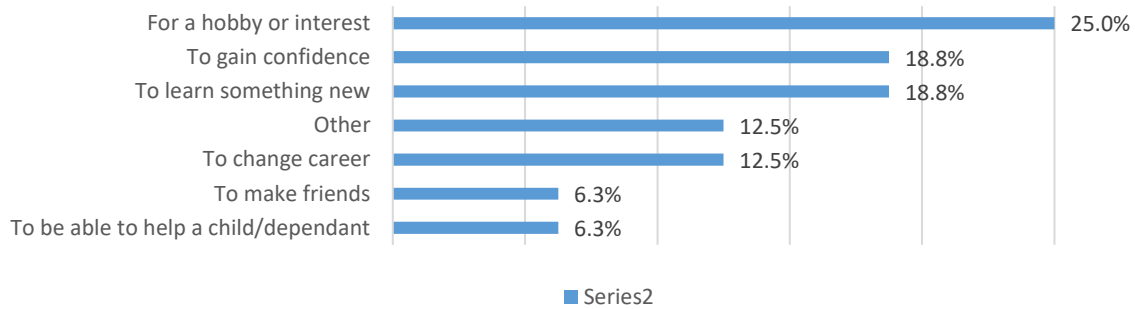
5.1 Reasons for taking most recent qualification – overall: ‘Learning something new’ was the most common response for survey respondents with 27.8% of respondents selecting this option, followed by wanting to ‘gain confidence’ – 18.5%. This focus on learning being more for personal development as opposed to ‘change career’ (10.6%) or ‘increase earnings’ (6.6%) is an interesting contrast in light of the current funding focus for Adult Education. The Department for Education (DfE) ‘Skills for Jobs White Paper’ and the West Midlands Combined Authority (WMCA) ‘Regional Skills Plan’ focus the Adult Education Budget (AEB) much more on skills for employment. This said we need to explore more what ‘learn something new’ means for respondents and it could be that some survey respondents meant this more in terms of learning something new for work. Likewise gaining confidence could be to do with gaining confidence to gain a job, or securing a better job.

Chart 5.1: Reasons for taking most recent qualification - Overall



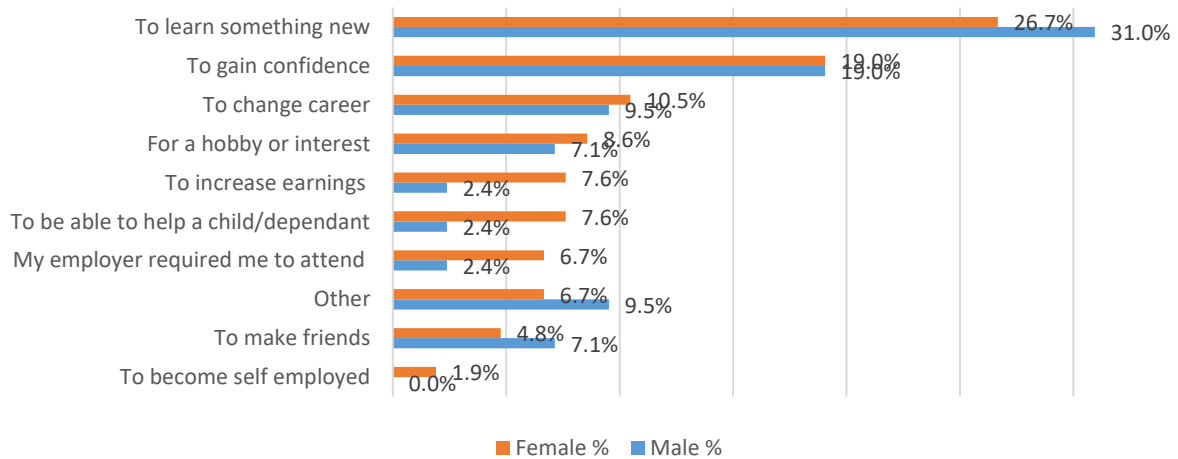
5.2 Reasons for taking most recent qualification – respondents with a declared disability: A much higher proportion of respondents with a declared disability selected ‘for a hobby or interest’ as their reason for doing their most recent course, with less selecting ‘to learn something new’ and none selecting ‘to make friends’, ‘my employer required me to attend’ or ‘to become self employed’:

Chart 5.2: Reasons for taking most recent qualification - respondents with a declared disability

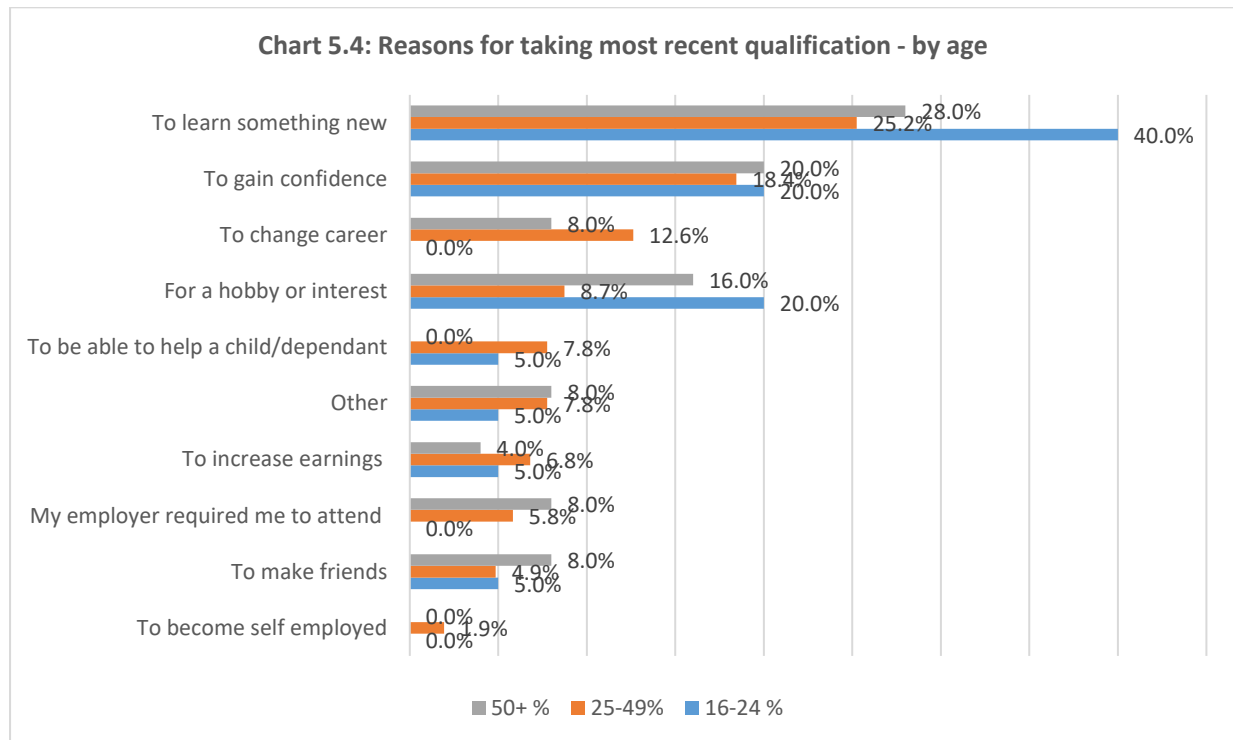


5.3 Reasons for taking most recent qualification – by gender: Slightly higher proportions of male respondents opted for ‘learn something new’, with lower proportions opting for ‘to increase earnings’, ‘to be able to help a child/dependant’ and ‘my employer required me to attend’:

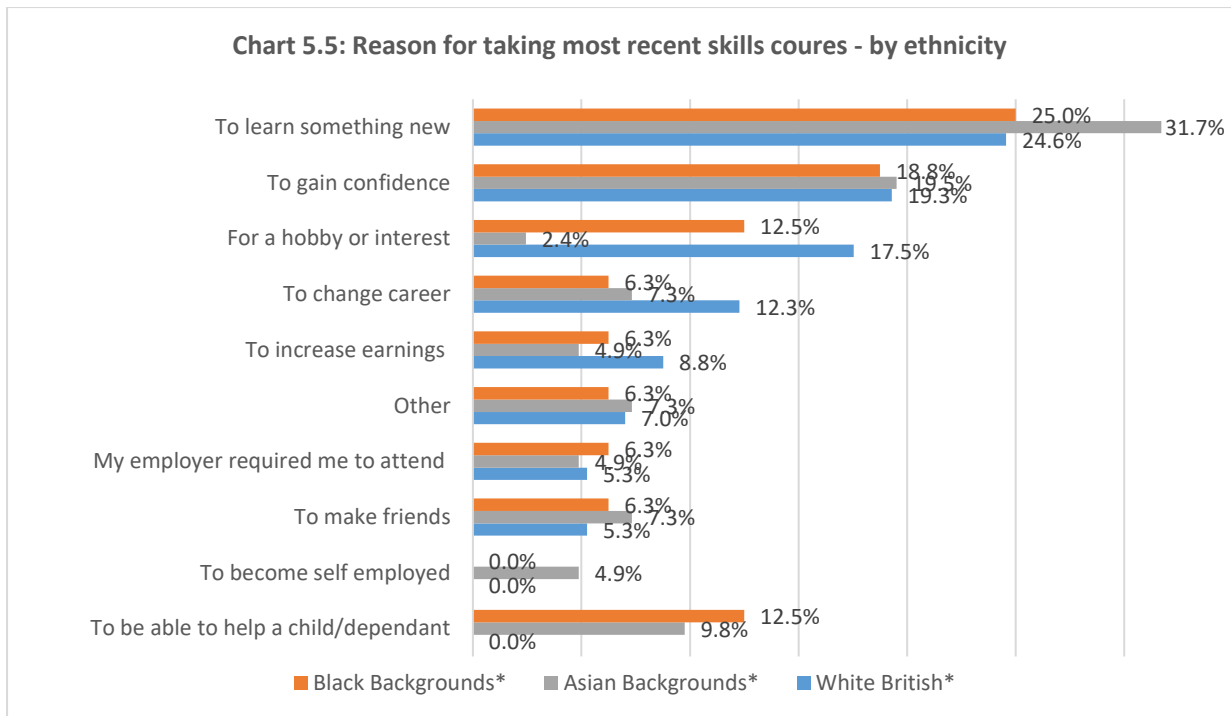
Chart 5.3: Reasons for taking most recent qualification - by gender



5.4 Reasons for taking most recent qualification – by age: Significantly higher proportions of 16-24 year old respondents selected ‘to learn something new’ and ‘for a hobby or interest’. Non in this age category selected ‘to change career’, or ‘my employer required me to attend’. This despite higher proportions of respondents in this age category being in full time employment. However, it may be reflective of more being at the start of their careers and doing their first jobs. Higher proportions of 25-49 year olds selected to ‘change career’ and ‘to increase earnings’ with less selecting ‘for a hobby or interest’. This perhaps shows greater focus for this age group compared to the other age groupings in using skills provision for career development and increasing earnings as opposed to more social or wellbeing related reasons:

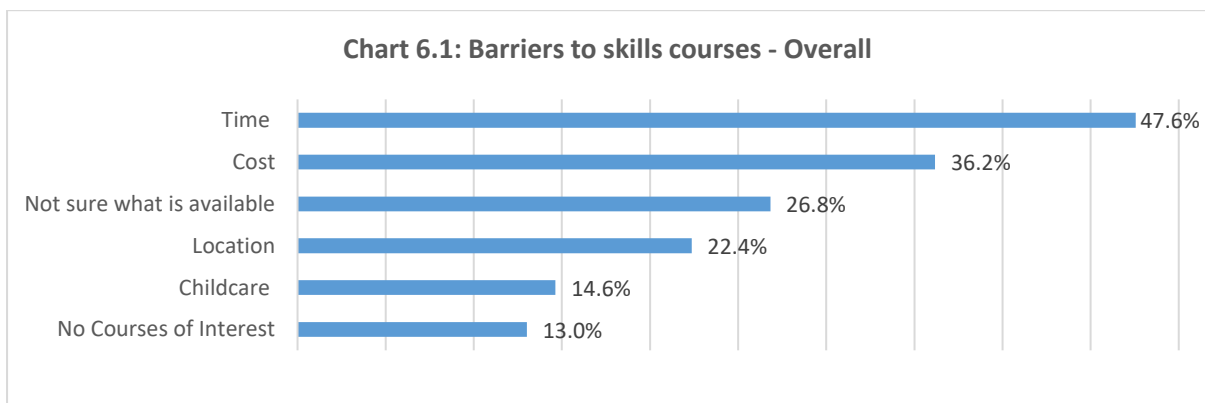


5.5 Reasons for taking most recent qualification – by ethnicity: Higher proportions of respondents from Asian Backgrounds* selected to ‘learn something new’, although significantly less opted for ‘hobby or interest’. Respondents from Asian Backgrounds* were also the only ethnic grouping who stated that they did their last course ‘to become self-employed’. No respondents from White British* backgrounds selected ‘to be able to help a child/dependant’.



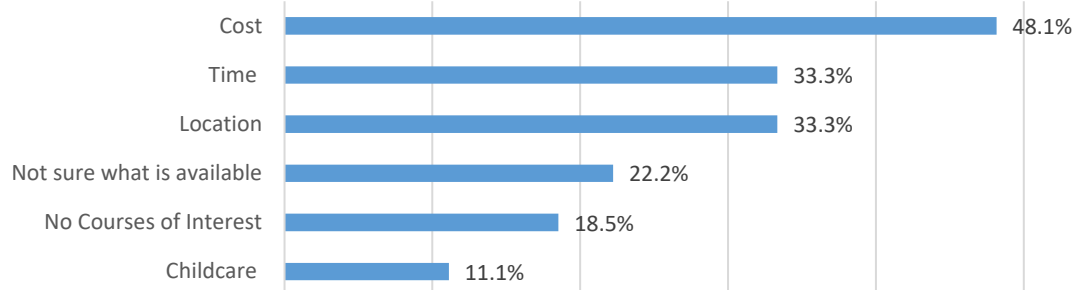
Question 6: What has stopped you from doing a skills course in the past? (tick all that apply)

6.1 Barriers to skills courses – overall: The most common barrier was time, followed by cost and then ‘not being sure what is available’:



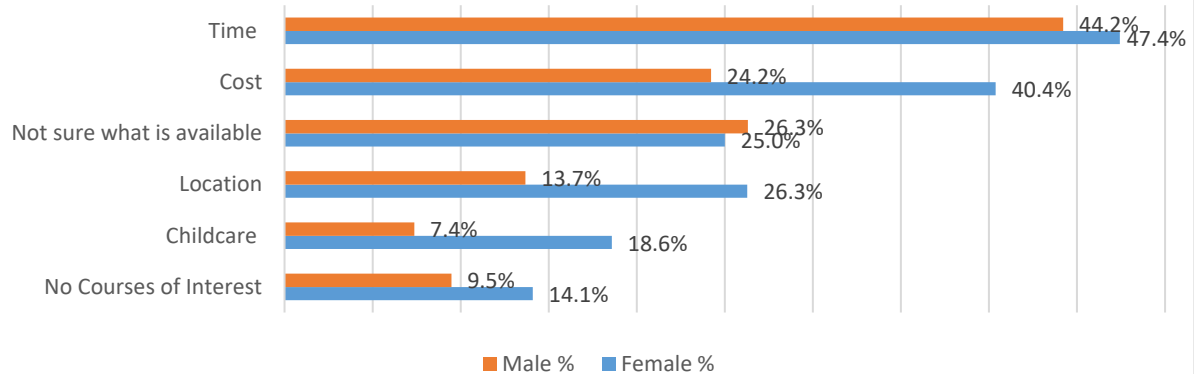
6.2 Barriers to skills courses – respondents with a declared disability: Cost was more of a barrier, with also a higher proportion of respondents with a disability stating location as a barrier (33% compared with overall average of 22.4%). More blended provision may better support those with disabilities to access courses where location is a barrier.

Chart 6.2: Barriers to skills courses - respondents with a declared disability



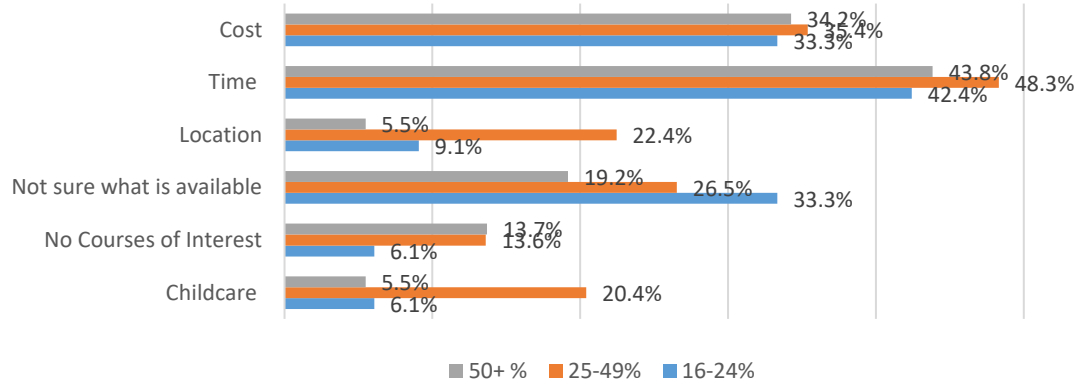
6.3 Barriers to skills courses – by gender: Cost was more of a barrier for female respondents as was the location of courses and childcare. This suggests that providers who want to attract more female learners need to think carefully about course location. It is of interest that childcare was a barrier for some male respondents as well, showing that this can be a general issue for families and more flexible provision may be needed.

Chart 6.3: Barriers to skills courses - by gender

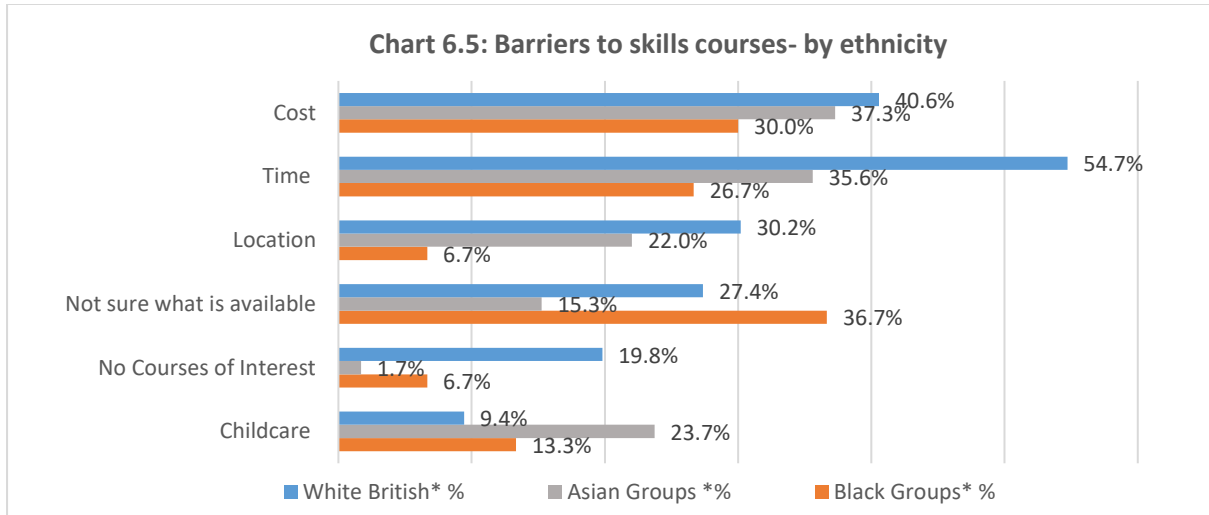


6.4 Barriers to skills courses – by age: Not being sure what was available features as a more prominent barrier for 16-24 year olds, suggesting that training providers need to work harder with this age group to promote their offers. In turn employment support providers, including careers guidance professionals need to ensure that young people understand their training options.

Chart 6.4: Barriers to skills courses - by age



6.5 Barriers to skills courses – by ethnicity: For the White British* group ‘time’ features more prominently as a barrier. This may be reflective of a higher proportion of this group being in full time employed as shown by table 3.35. For respondents from Black Backgrounds* we can see that ‘not being sure what is available’ is the most prominent barrier. This suggests that skills providers and employment support providers may need to work harder with this group to ensure their offers are clearly communicated. For respondents from Asian Backgrounds* childcare is a far more significant barrier than for the other two ethnicity groupings.

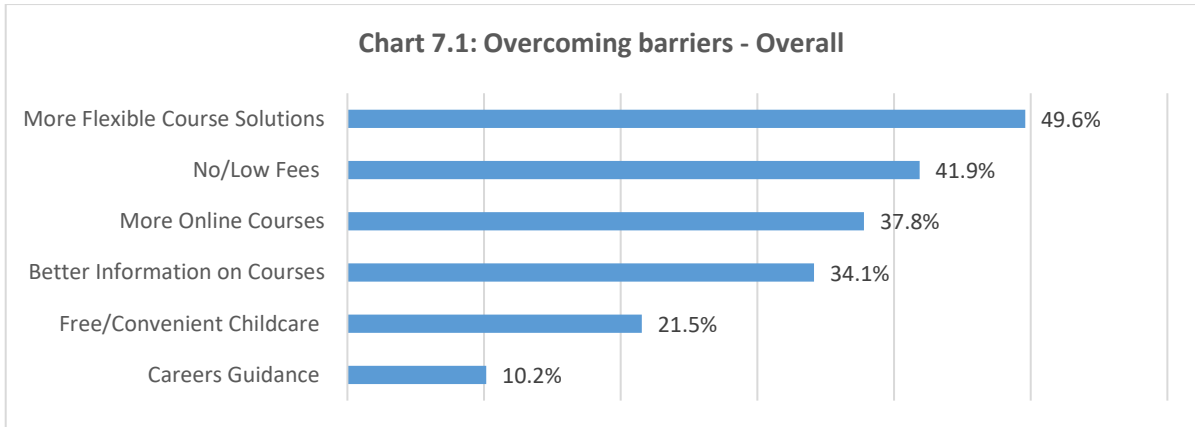


Question 7: What would help you overcome these barriers (please tick all that apply)

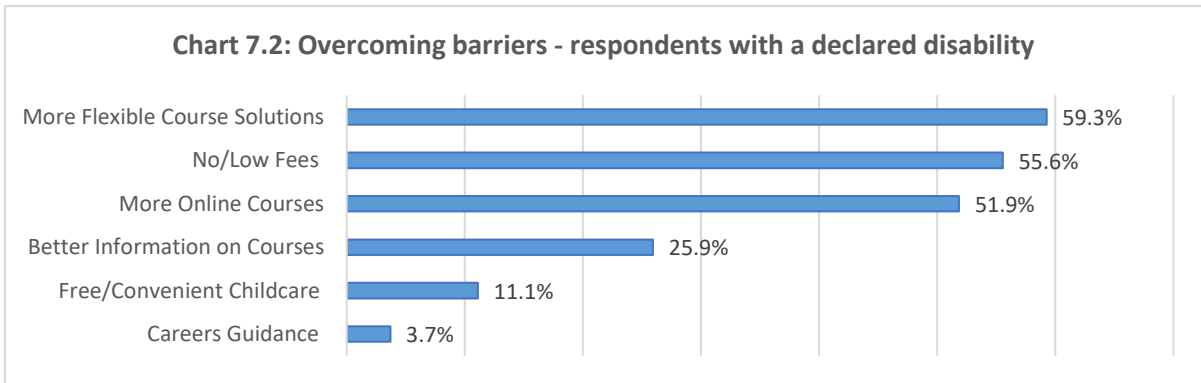
7.1 Overcoming Barriers – Overall: It is clear that Adult Skills Providers need to make courses as flexible as possible, with just under 50% of survey respondents stating that this would help overcome barriers. In addition they need to continue to increase their online offer with 37.8% of respondents stating this would help them. Providing good information on courses is also key and is a challenge also to Employment Support Providers such as JobCentre Plus (JCP), Coventry Job Shop and the National Careers Service (NCS) who can serve as a key referrer to adult skills courses (see Q9).

A lot of respondents have stated that ‘no/low fees’ would help them to access more skills courses. This could be reflective of the high percentage of respondents who were ‘employed full time’ (58.9%), as the majority of those who are out of work can access courses for free, as can many who are in low paid work. Also, respondents may need ‘better information on courses’ as it may be some are not aware of what they can access for free, for a low fee, or options to use the student loan system.

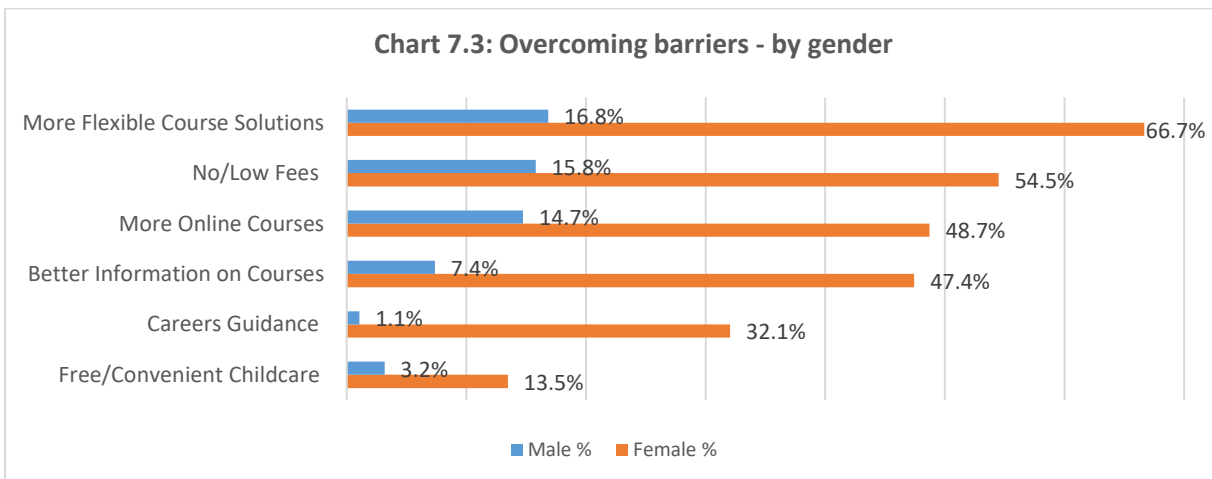
As with question 6, childcare should not be underestimated as a barrier, with 21.5% of respondents stating that free/convenient childcare would support them to access skills courses. This can be linked to needing more flexible courses solutions and more online courses as both of these could make it easier for parents to access courses:



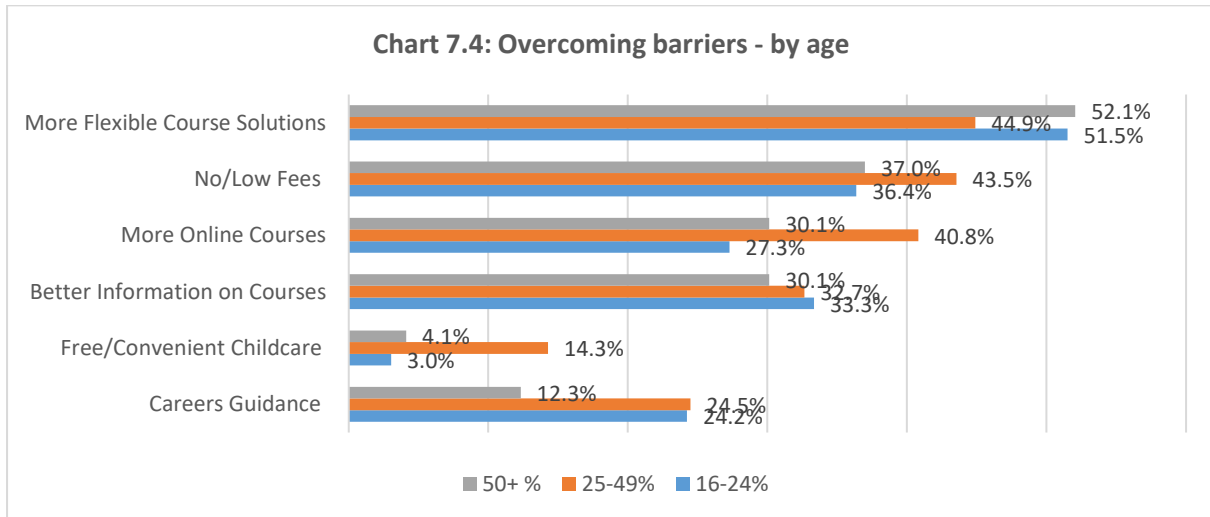
7.12 Overcoming barriers – respondents with a declared disability: For respondents with disabilities there was a significantly larger percentage who stated that they wanted ‘more flexible course solutions’, ‘no/low fees’ and ‘more online courses’. Slightly less from this group stated that they needed ‘better information on courses’ and significantly less stated ‘free/convenient childcare’ and better careers guidance.



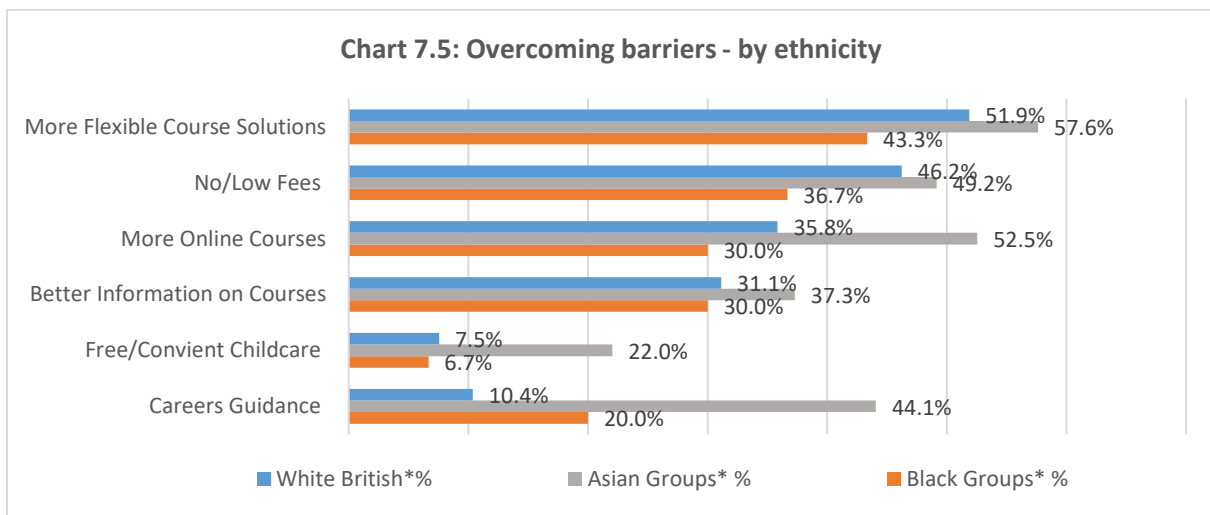
7.13 Overcoming barriers – by gender: Female respondents were more ‘vocal’ in their response to this question with considerably higher percentages responding to all barriers. This suggests Adult Skills Providers need to particularly think about barriers for female learners. This said both nationally and locally there are considerably more female respondents accessing Adult Education Budget (AEB) courses with a ratio of around 60% female to 40% male. This suggests there may be other reasons, not picked up in this survey, for males not accessing courses this is a point to address when this survey is ran again in subsequent years.



7.4 Overcoming barriers – by age: Course flexibility was a bigger issue for both the 16-24 and 50+ age groups. Conversely ‘no/low fees’ was a bigger issue for the 24-49 year old group. Interestingly wanting more courses online was not as big an issue for 16-24 year olds as for 25-49 year olds. This perhaps goes against assumptions and shows offering more online solutions could actually attract more 25-49 year olds than 16-24 year olds. ‘Free/convenient’ childcare was understandably a bigger issue for the 25-49 year old group, reflective of increased likelihood of childcare responsibilities.



7.5 Overcoming barriers – by ethnicity: Respondents from Asian Backgrounds* were considerably more responsive with much higher percentages for ‘more flexible course solutions’, ‘more online courses’, ‘better information on courses’ and ‘careers guidance’. ‘Careers guidance’ also features more prominently for respondents from Black Backgrounds* as well.

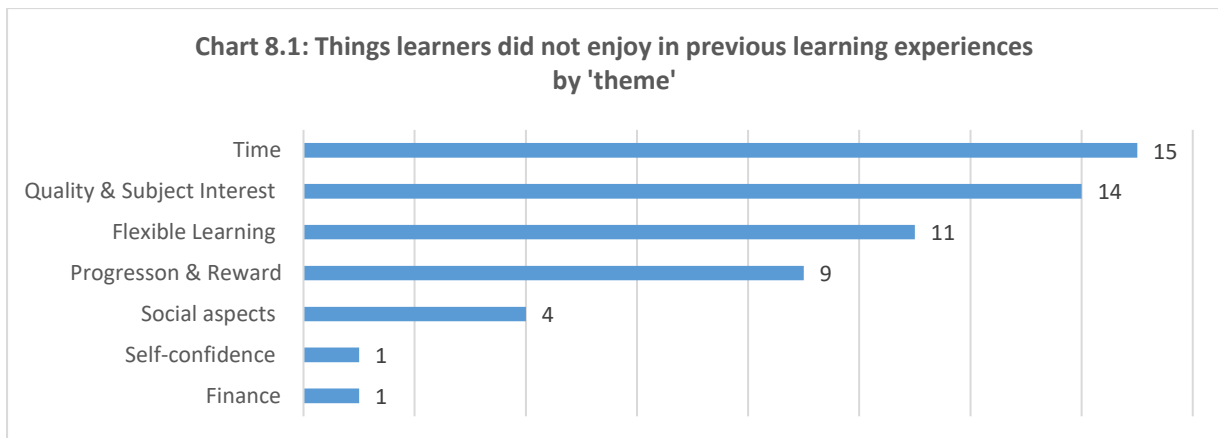


Q8 What, if anything, did you not enjoy about your previous learning experiences (open text responses)

This question was answered by 55 of the survey respondents. Responses have been grouped into themes to show patterns:

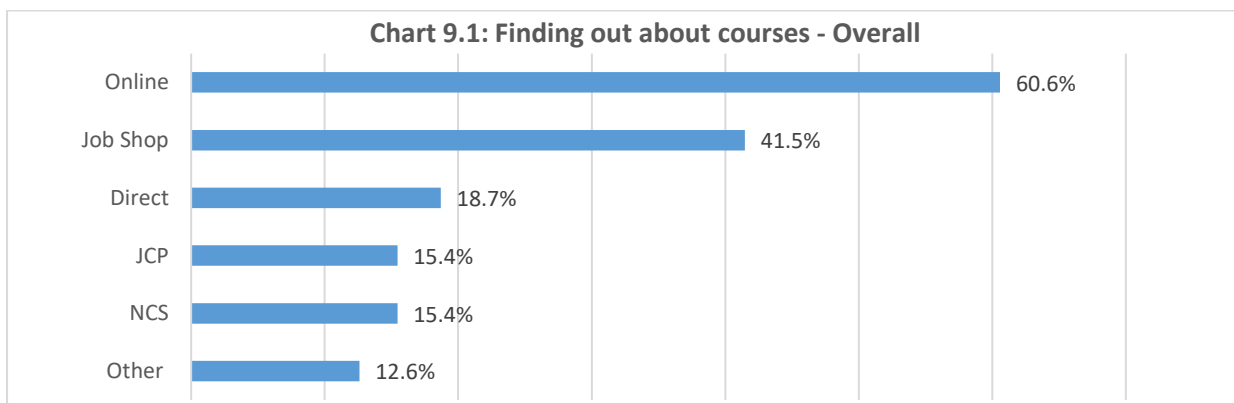
- **Time (15 responses):** For example - ‘Not having enough time in work to do it’ or ‘having to fit studies around my part time job’.

- **Quality and Subject Interest (14 responses):** For example - 'staff were not well prepared' or 'some of the topics in the course felt irrelevant'.
- **Flexible Learning (11 responses):** For example – 'Too much time traveling to the location' or 'fixed hours of delivery even though it was an online course'.
- **Progression and Reward (9 responses):** For example – 'it didn't help me to get a new job' or 'sometimes courses were very vague with no qualification'.
- **Social Aspects (4 responses):** For example – 'bullies in the class', or 'loudest people get the most attention'
- **Other: 'Self confidence' and 'finance' with one response each.**



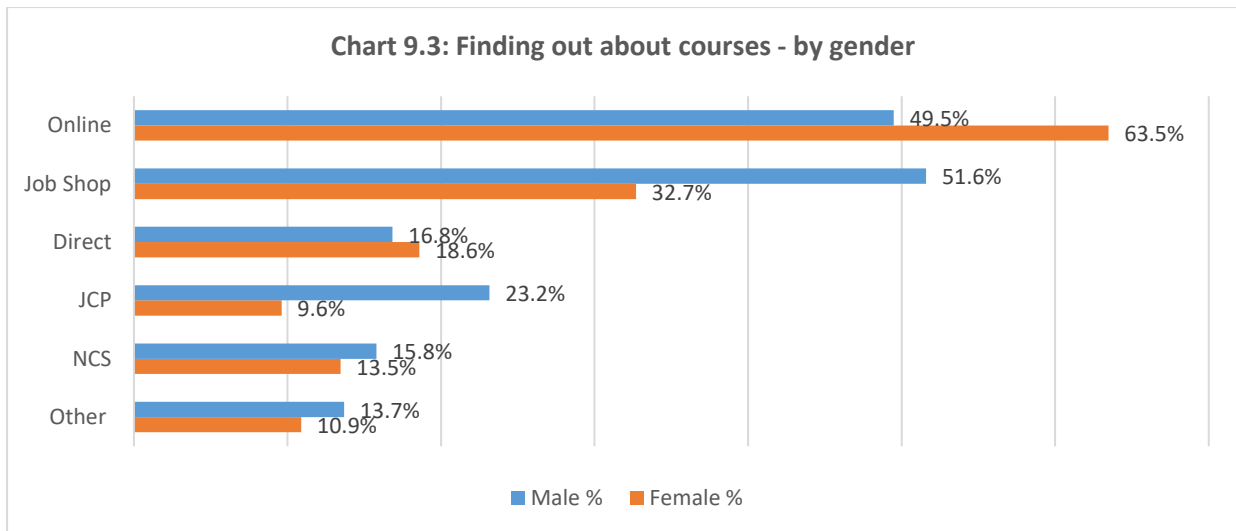
Q9: Where would you go to find out information on available courses? (Tick all that apply)

9.1 Finding out about courses – overall: It is clear that Adult Skills Providers need to have a strong online presence with 60.6% of survey respondents saying they would find out about courses this way. However, it is still important for Skills Providers to work closely with referral partners especially the Coventry Job Shop with 41.5% stating they would use the Job Shop to find out about courses.

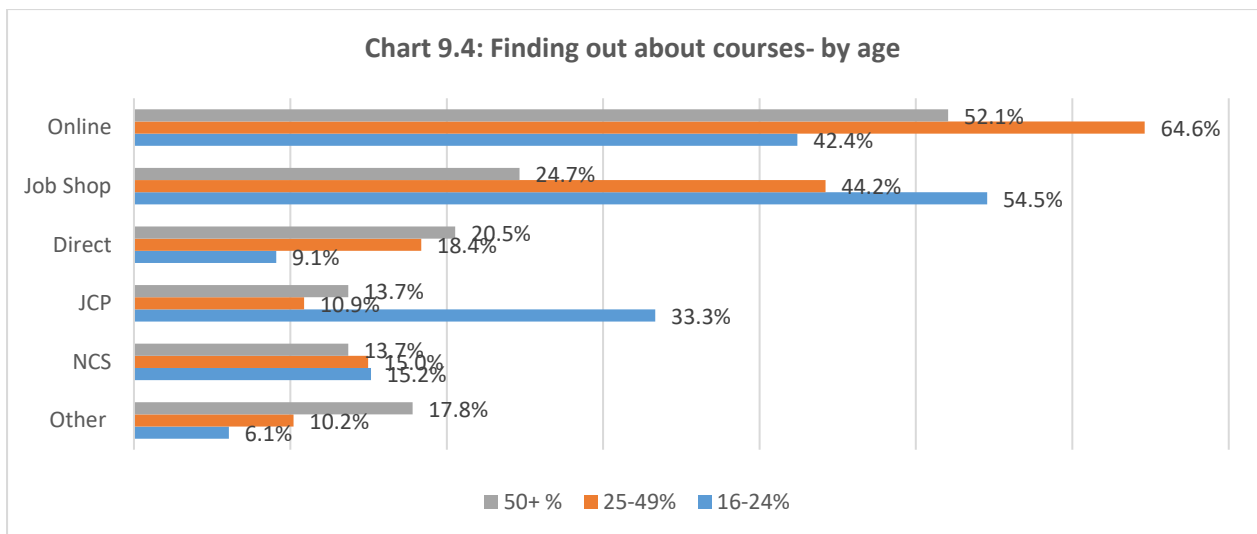


9.2 Finding out about courses- respondents with a declared disability: Responses from this group were roughly in line with overall responses.

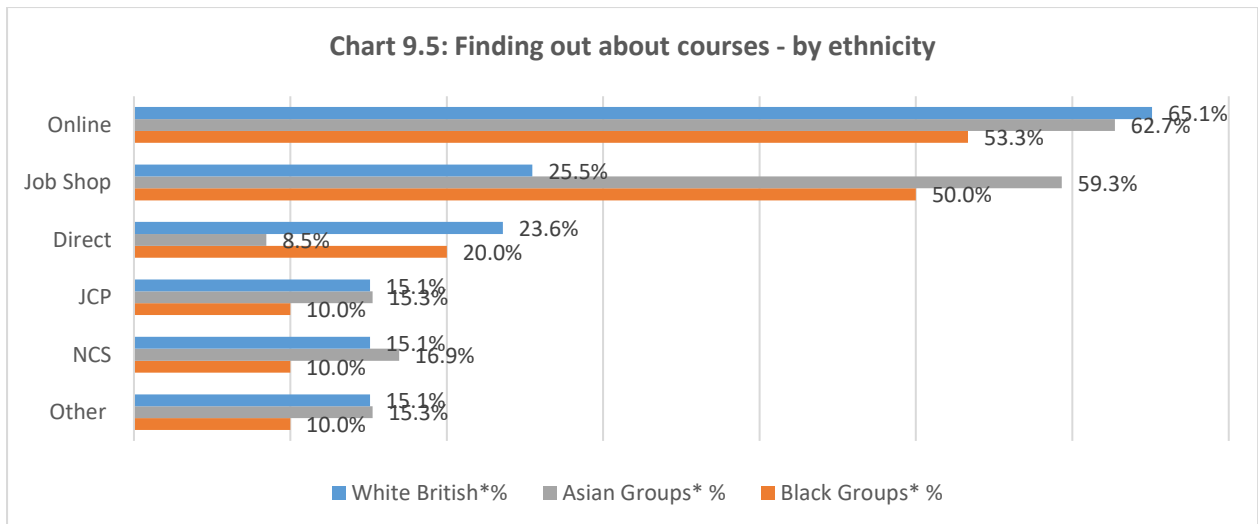
9.3 Finding out about courses – by gender: Higher proportions of female respondents favoured finding out about courses online, whereas a significantly higher proportion of male respondents favoured face to face information – especially from the Job Shop (51.6 compared to 32.7 of female respondents) and JCP (23.2 compared to 9.6% of female respondents).



9.4 Finding out about courses – by age: The 16-24 age group showed the lowest preference for finding out about online courses, which is consistent with responses to question 7 with lower proportions of 16-24 year olds wanting online course delivery compared with the other age groupings. The 16-24 year old group were much more likely to want face to face information then the other two age groupings, especially from JCP and the Job Shop.



9.5 Finding out about courses – by ethnicity: Online information was selected by more White British* and Asian Backgrounds* respondents than Black Backgrounds* respondents. Both Black and Asian Backgrounds* respondents showed a significantly stronger preference for the Job Shop than White British* respondents. This was not the case for other face to face sources of information though with Black Backgrounds* respondents selecting NCS and JCP less than the other two ethnicity groupings.



Q10 What makes learning fun for you? (open text responses)

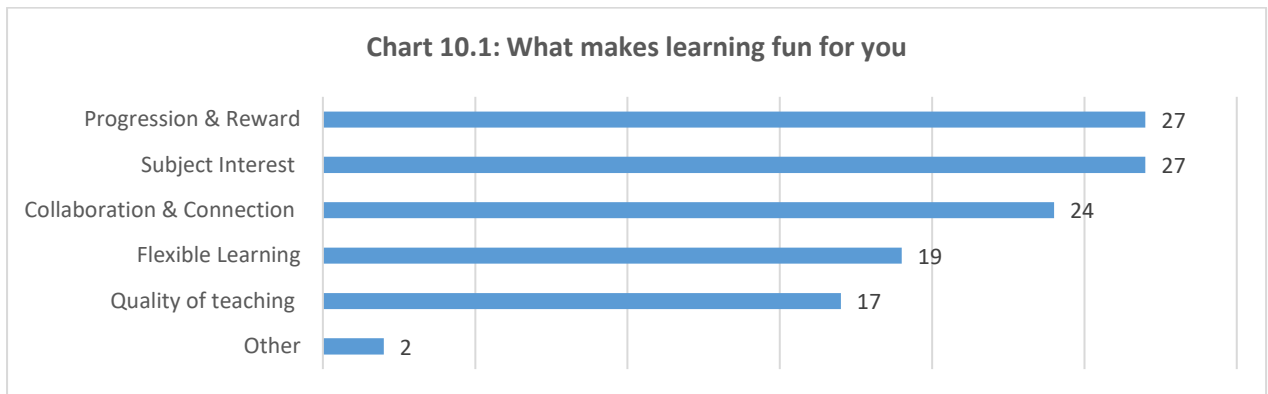


This question was answered by 116 of the survey respondents. The above word cloud shows the importance of other ‘people’ with several survey respondents expressing that they wanted to work in groups collaboratively and with ‘like-minded’ people. There was a lot of emphasise also on the quality of tutors especially their teaching style and passion for the subject they teach. Interest in the subject and the learning environment also feature quite strongly in the word cloud.

To consider whole responses rather than individual words, responses have been grouped into themes to show patterns. This shows a stronger emphasis on ‘subject interest’ and the ‘progression and reward’ then reflected in the word cloud:

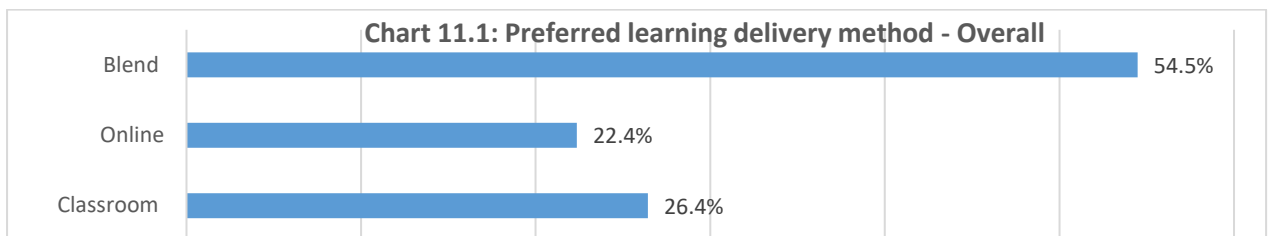
- **Subject Interest (27 responses):** For example – ‘learning something new’ or ‘passion for a particular subject/area’
- **Progression & Reward (27 responses):** For example - ‘learning something useful that will further progress my career’ or ‘transferrable skills and improved understanding’.
- **Collaboration & Connection (24 responses):** For example – ‘Having like-minded people with you’ or ‘interaction with peers and networking’.
- **Flexible Learning (19 responses):** For example – ‘Easy bite-sized lessons’ or ‘flexible time scheduling’
- **Quality of teaching (17 responses):** For example - ‘Passionate teachers that enjoy the content being taught’ and ‘good tutor support with helpful feedback’.

- **Other (2 responses)**

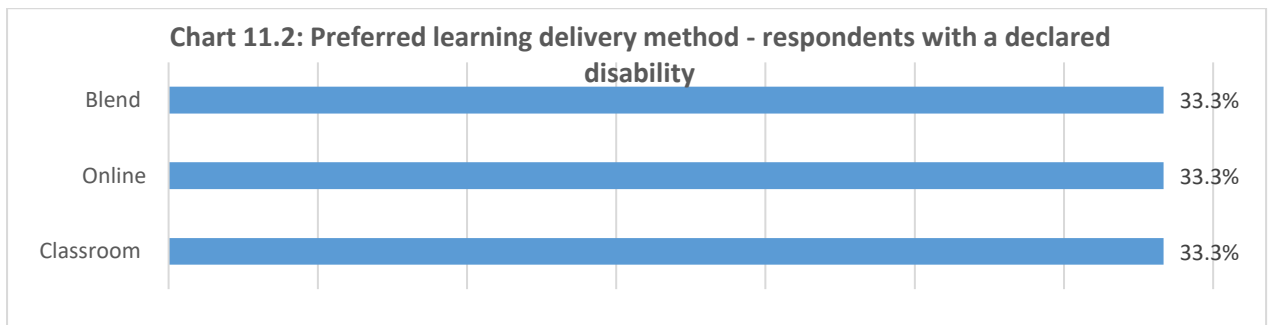


Q11 How do you prefer to learn (tick one)

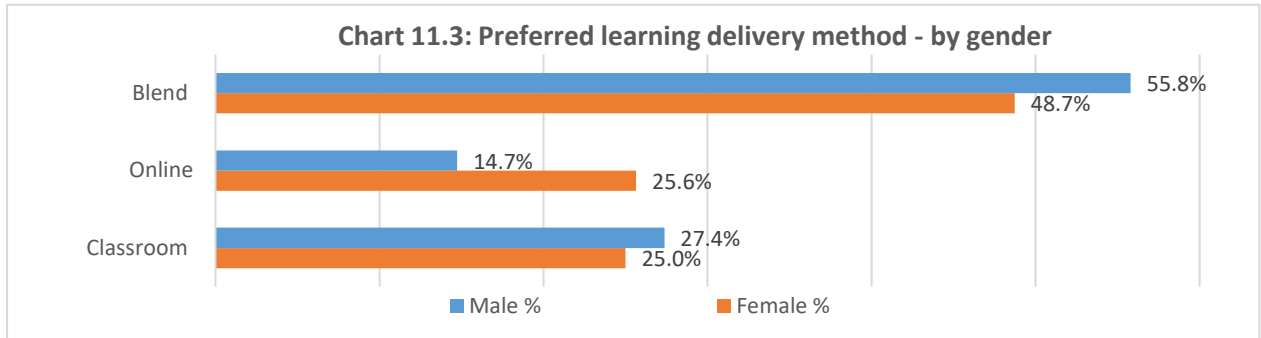
11.1 Preferred learning delivery method – overall: Overall there was clear preference for blended learning. Slightly higher numbers of respondents preferred solely classroom over solely online.



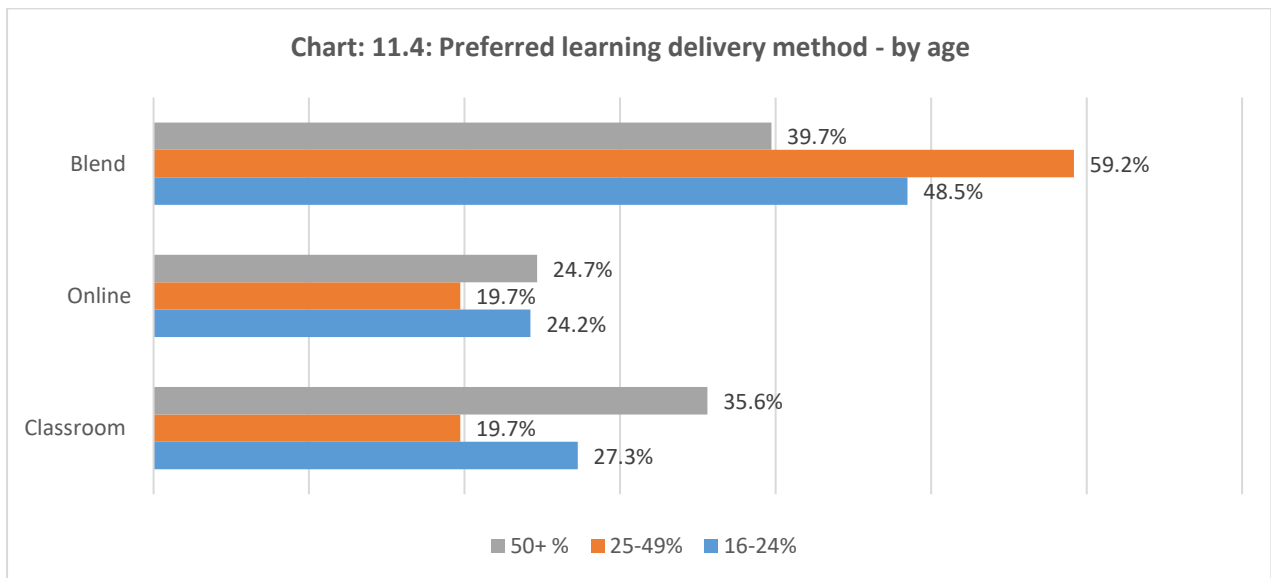
11.2 Preferred learning delivery method – respondents with a declared disability: There was a lower preference for blended learning from respondents with a declared disability, with responses being evening split between the 3 options.



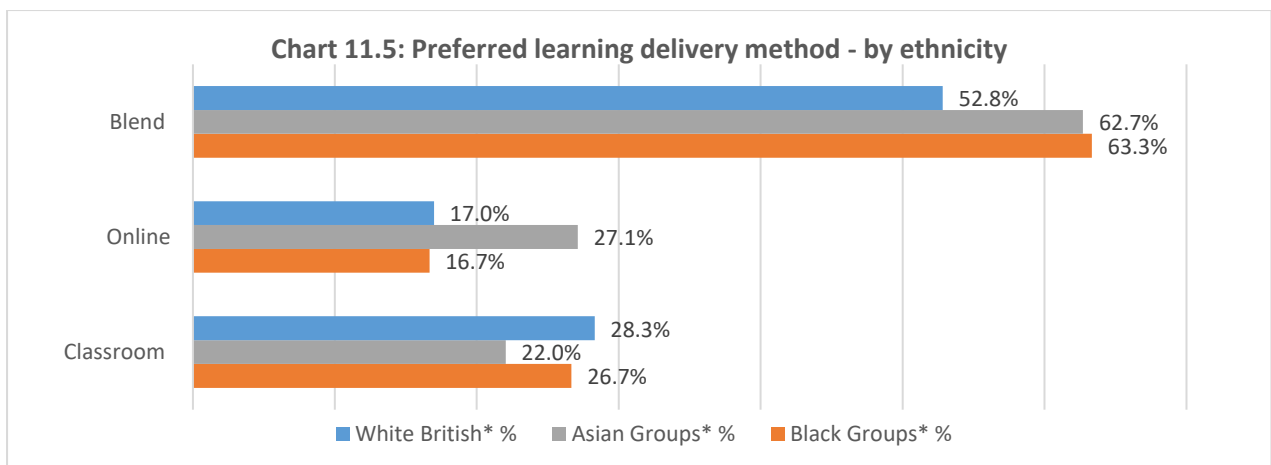
11.3 Preferred learning delivery method – by gender: Slightly higher percentages of male respondents opted for blended and classroom-based learning, but much lower percentages of male respondents opted for online learning compared to female respondents.



11.4 Preferred learning delivery method – by age: Blended learning was the most common response for the 25-49 age group. The 50+ group were the most likely to choose classroom learning with nearly as many choosing this option as blended.



11.5 Preferred learning delivery method – by ethnicity: A significantly higher percentage of respondents from Asian Backgrounds* opted for online learning then the other two ethnicity groupings.



Q12 & 13: These questions didn't add anything of note for the purposes of this report.

Q14: Do you have any suggestions for how we can improve skills provision in Coventry (open text responses)

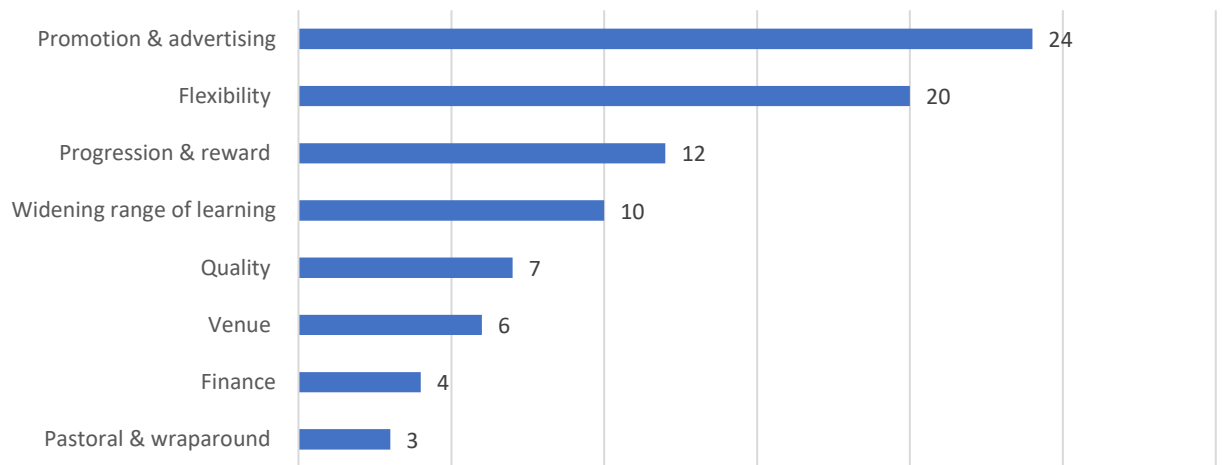


This question was answered by 86 survey respondents. The above word cloud shows that many felt courses could be better advertised and promoted. Respondents showed a preference for 'in person'/'face to face' courses. However, some did state that they wanted courses to be streamed. Flexibility of course delivery also featured with some wanting evening or weekend courses. Also featured were responses around good 'prior information' on course content.

To consider whole responses rather than individual words, responses have been grouped into themes to show patterns. This reflects the word cloud in showing the most common responses were around promotion and advertising of courses. 'Flexibility' features more strongly than in the word cloud as does 'progression and reward':

- **Promotion and advertising (24 responses):** For example – 'Increasing advertising of courses', or 'better promotional materials.'
- **Flexibility (20 responses):** For example – 'More out of hours courses' and 'more weekend courses.'
- **Progression and reward (12 responses):** For example – 'Progressing to a higher level, after learning the basics' and 'have an end destination such as an interview with an employer'.
- **Widening the range of learning (10 responses):** For example – 'More 'refresher' courses for people who have been away from a job for a few years' or a 'design courses that meet real work world needs'.
- **Quality (7 responses):** For example – 'Trainers need to better apply information.' Or 'having extra teachers in the class to provide more 1 to 1 support'
- **Venue (6 responses):** For example – 'a more central training venue' and 'a venue with better parking'.

Chart 14.1: Suggestions for improving skills provision in Coventry



Stakeholder Consultation List

Category	Organisation/Service Area	Written Feedback Received
CCC	Adult Social Care	
	Children and Young Peoples Partnership	
	Customer Service	
	Early Help Partnership/Children and Young People Partnership	
	Economic Development Service	Contributed directly to doc
	Educational Improvement	
	Extended Service Leadership Team	
	Housing and Homeless	
	HR	
	Migration Team	Yes
	Organisational Development	
	Public Health	
	Sustainability and Low Carbon	Contributed directly to doc
	Violence Prevention/West Midlands Police Project	Yes
Community Organisations	Caribbean Centre	
	Grapevine	
	Highlife Centre	
	Indian Community Centre	
	Moat House Community Trust	
	Watch	
	Weetec	
FE Colleges	Coventry College	
	Hereward College	
	NWSLC	
	Warwickshire College Group	
Independent Training Provider	CW Chamber Training	
	Foleshill Womens Training	
	Go Train	
	New Start 4 U	
	Pet Xi	
	Princes Trust	
Universities	Coventry University	Yes
	Warwick University	

Stakeholder Consultation List

Category	Organisation/Service Area	Written Feedback Received
Regional/Sub Regional Bodies	CWLEP	Yes
	WMCA	Yes
Other	Citizen Housing	
	JCP	
	Mental Health Matters	
	Prospects (NCS)	
	Positive Youth Foundation	
Business Representative Bodies	FSB	Yes
	BiTC	

CW Chamber Training: Sally Lucas, Executive Director

Questions:

- 1. What's your view on these 10 priorities? Describe the areas that you agree with and disagree with. Is the language of these priorities suitable?**

Overall, I think the priorities cover the range of audiences. Don't disagree with any as such.

How will the priorities be measured to know what success looks like ? I'm not sure what the starting point is or what the end goal is.

I think 10 are quite a lot of priorities and there is probably overlap in some areas eg. 8 and 9.

- 2. Is there anything you would add? Any gaps?**

I would probably group the priorities and have some as a sub-set of the high level aim eg. Overall skills levels with 2 and 3 as a sub set ?

- 3. What actions do you think Coventry should take to help achieve these priorities?
Please suggest:**

- Actions that would support individual priorities
- Actions that would support multiple priorities

Would need to know the baseline starting point under each priority and what success looks like.

Provide the structure to join skills provision up/access existing structures to influence and inform.

- 4. How could you and your organisation contribute to these priorities.**

Offering practical options eg. ESF NEET provision opportunities, traineeships and apprenticeship vacancies. Provide a bridge into employment and employers. Work with schools/FE to seamlessly progress.

5. Can you make suggestions for how these priorities should be measured?

Identify the starting point eg. current skill levels of Coventry residents and current skills priorities of local businesses. Benchmark with nearest statistical neighbours.



Lee Osborne, Development Manager Coventry, Solihull and Warwickshire

Introduction

The Federation of Small Businesses (FSB) is the UK's largest business support organisation, promoting and protecting the interests of the self-employed and small business owners. Established over 45 years ago to help our members succeed in business, we are a non-profit making and non-party political organisation that's led by our members, for our members.

The FSB in Warwickshire, Coventry and Solihull welcomes the opportunity to respond and input to Coventry Skills strategy which aims to give Coventry based businesses the skills they need both currently and in the future.

FSB research has consistently shown that small businesses are facing real skills challenges.

According to our latest small business confidence the share of small businesses who say lack of access to the right staff is holding them back is at its highest level in six years at 38%. Close to a quarter of employers in the West Midlands state that it is difficult to find individuals with the right skills in their area and a similar proportion say hiring is a struggle because they require individuals with niche skill sets.

The FSB is therefore keen to support Coventry City Council and other partners to help deliver an effective and locally relevant skills strategy. This will not only aim to enable the development of skills within the local population but also help ensure businesses can employ people with the right skills sets and achieve their growth ambitions, having a positive impact on the local economy.

We would therefore welcome the opportunity for further involvement as the document progresses and evolves to help address shared priorities and outcomes. We have provided some initial thoughts on some of the questions within the consultation below:

Consultation questions

What is your view on the priorities?

The FSB can agree with the summary of priorities, outlined in the consultation document.

While we have a particular focus on priorities 8 – 10, we would agree that all the priorities within the document are relevant and should be supported.

While the language of the priorities is suitable, there could be further reference in here as to how they fit in with Government priorities and initiatives at a national level around apprenticeships, skills bootcamps and lifelong learning aims. It would also be useful to provide some context around the priorities and provide an understanding as to how the skills strategy will link in with other skills initiatives and strategies that are being developed across the region such as Local Skills Improvement Plans and regional skills strategy developed by WMCA.

We would also welcome reference to the self-employed and sole traders under priority 8 and a focus on entrepreneurship.

Is there anything you would add?

While Priority 3 aims to outline and provide clear progression pathways, consideration should be given to including points around effective careers and employability advice. When recruiting young people, small businesses are seeking individuals who are able to successfully transition from education to the workplace and possess the skills their firm needs to grow. Careers advice, information and guidance that covers a range of education, training and employment pathways and facilitates opportunities to gain experience of the working world, can help to achieve this and should be included either in the existing priorities or as a separate priority.

Small businesses can play a key role in helping improve young peoples awareness of apprenticeships, facilitate access to opportunities to experience the workplace first hand and inform young peoples understanding of enterprise and self-employment. We believe that this priority area should see schools, colleges, Coventry careers hubs and other key stakeholders working with small firms to identify and pursue opportunities for successful engagement and to provide careers advice guidance to young people, raise aspirations and meet local labour market need.

In relation to priority 8 and 9 which will be critical in terms of future employment, we would also like to see reference to the importance of leadership and management skills training and support small firms to invest in this area emphasising the link between skills training and improved business productivity and competitiveness.

What action do you think should be taken to help achieve these priorities?

FSB research has consistently shown that small businesses are facing skills and employment challenges. The share of firms citing lack of access to appropriately skilled staff as a barrier to growth has risen in the FSB quarterly small business confidence surveys and in the Q2 2021¹ survey had soared to its highest level in a

¹ <https://firstvoice.fsb.org.uk/first-voice/regional-voice/fsb-west-midlands-sbi-2021-q2-report.html>

number of years (37%) for West Midlands firms, with the proportion of respondents citing it as a barrier up 18 percentage points compared to Q2 2019, before the pandemic hit.

The FSB is therefore keen to support Coventry City Council and other partners to focus on education and skills development, employability skills, technical skills and local skills development. This will help to inform the key skills requirements and provision now and for the future to ensure businesses can grow and have a positive impact on the local economy.

We would welcome continued engagement with Coventry City Council and other stakeholders locally in liaising with small businesses to tackle skills challenges and future skills needs. Key actions here could include:

- Hold joint events or webinars to help inform a wider network of small businesses about the role that local stakeholders including the local authority, colleges, careers hubs and Universities all play in this space and how it can benefit small businesses across Coventry
- There is still a lack of general awareness from small businesses about the services and initiatives that are available to help them with skills and recruitment challenges.

Therefore, consideration should be given to holding an event specifically targeted at small businesses to include businesses sharing skills and recruitment challenges, awareness raising of local support services and benefits of supported internships, apprenticeships, traineeships and funded skills programmes for businesses. To help inform about the benefits of these initiatives it would also be useful in sourcing a number of business case studies to share at these events.

- FSB would be willing to organise and coordinate a roundtable with a group of small employers to discuss skills and employability challenges locally to ensure there is direct feedback to the Coventry City Employability and Skills team and other partners locally of the types of challenges and issues being faced.
- We welcome increased engagement with SME's through specialist advisers at the local authority to work with them to identify and support their skills and employment needs. This would again help highlight initiatives and resources such as use of the Apprenticeship levy to provide fully funded training and the promotion by member representative organisations of case studies to help showcase the

benefits of this service and engagement would also be beneficial to any service provided.

How should these priorities be measured?

We would like to see some important outputs and outcomes included in the description of each of the priorities. These should have timescales and targets attached to help make it easier to evaluate progress and specify more clearly with success looks like.

The FSB see the outcomes around reducing the number of businesses reporting skills shortages and the focus on apprenticeships is being amongst the most important from a business perspective. We would also like to see more emphasis placed on increased engagement from small businesses in supporting local programmes which encourage apprenticeships and work with schools and colleges to help raise awareness of careers and self-employment opportunities. Specific measures could also include an increased business representation on local skills boards to make it accessible for local employers to input.

**Violence Reduction Unit CCC/West Midlands Police: Caroline Ryder,
Programme Manager**

Thanks for sharing the draft strategy. Just a few points from me. I don't really need you to come back to me with answers but I just wanted to point them out for your consideration!

Priority 1: Could be measured by taking the baseline of current skills and then again at a later point - however, things like GCSE attainment may take 5 years to show an improvement..... I would think that the closure of Henley college will hamper this ambition somewhat. Perhaps mention in the strategy how this can be addressed?

Priority 2: I think this will be very difficult to measure. I'm not sure what the Gatsby benchmark is. My personal experience of careers advice for my own kids has been that it's flaky at best. it's very much an optional thing and most kids wouldn't take it up because at 15, if you don't have to do it, then likelihood is you won't. What "added value" can the careers advisor bring? It's no longer enough to just give people the information - young people need coaching/guidance. It may be that we have to prioritise certain areas of the City or schools. In Marmot we often talk about proportionate universalism - this would be a perfect example. For some kids, telling them about an apprenticeship is enough- they can do the rest. For others, they may need additional support to be able to access opportunities because of barriers they face.

Priority 3: Have "we" been in consultation with local business/industries about what their expectations are not only of school leavers but also older adults. Business want staff with certain skills and with some investment from them they could pay for short courses in for example, basic IT. I know we had an annual skills summit so not sure if any data was ever captured about the skills gap but I know it's something employers talk about a lot.

Priority 4: I suppose a good example of this would be the classroom facility at Moathouse - not sure if they are well used but with Henley College closing, it would be good to make more of that facility. Are we making the most of on-line learning opportunities? There is so much stuff out there now that's accessible on-line, the quality varies enormously but there must be some valuable learning to be done online.



Priority 5: No comments

Priority 6: I think it would be useful to link in with people like the probation service here. I have contacts if you need. Also - positive choices, the young peoples drug, alcohol and sexual health service. Again I have contacts. I'm just thinking of community organisations that could signpost people into provision.

Priority 7: No comments

Priority 8: I haven't seen the new social value strategy - if you can lay your hands on a copy I'd be interested to look it over. Thanks.

your feedback form said 10 priorities, but I count only 8? Also, are you completing an Equality Impact Assessment on this strategy? If not, give Jaspal Mann a shout and she can assist you. It's something that often gets overlooked but needs to be completed to ensure we aren't overlooking any protected groups.

Sorry for the lengthy email!



Coventry University: Joanne Dobson, Associate Pro-Vice-Chancellor (Group Policy)

Apologies. I thought I had followed up on your email but can't see a reply in my sent mail. I hope this is still useful.

I think that the main piece of feedback would be to raise the importance of education and not just skills.

I'm pleased to see a priority of "aspiration" so high up the list. As one of the city's universities, our Mission of "Creating Better Futures" fits well with that.

We also agree with the need for clear progression pathways. I'm not sure if you're aware, but the government recently (last week) announced the new Office for Students Director of Fair Access and Participation and that universities would need to revise their Access and Participation Plans. This may mean increasing activity in schools, which could well support clear progression – and indeed aspiration. This may also impact on diversity and supporting areas of highest need. Finally, there may also be some measurements in our APP that could be useful for you in terms of measuring the priorities. Please let me know if you'd like me to reach out to the relevant team here as this new plan develops.

Re: Priority 6. Should this be worded more to reflect inclusivity of those with the highest need? Does it currently read as though the skills system focusses primarily on those with the most need? Interestingly, we welcomed the Labour Councillors onto campus recently and there was a discussion about support for veterans. Is that an area of high need in the city?

We welcome the acknowledgement of support the skills needs of companies in the city. I would be happy to reach out to colleagues on the Technology Park on that point if that would be helpful.



Finally, there are almost certainly other areas on this that our 2030 Strategy could support. This can be found here:

<https://www.coventry.ac.uk/globalassets/media/global/09-about-us/corporate-strategy/group-strategy-2030-compressed.pdf>

Happy to have a conversation on any of these points if that would be helpful.

CCC Public Health: Sue Frossell

Priorities 1-3:

To achieve this, proportionately more resources will need to be applied across the gradient of skills need. Below references reflect a need to measure 'overall skills measure' (hides unequal uptake), moving out of poverty, helping most in need (both focus on most need). Can we apply our resources across a gradient of skills need and measure this uptake? Rather than most, can we use the term more? Uptake by postcode is a crude measure but might be helpful alongside other measures?



Coventry City Council Skills Strategy

Contact: Glen Smailes, Employment and Skills Service (T: 07967 820436)

Priorities Consultation:

A comprehensive, citywide skills offer that raises aspirations and allows each and every learner throughout their lives to reach their full potential

We want aspirations to be high at each level of Coventry's skills system, from Primary education through to Adult Education including 'lifelong learning'. We want Coventry's young people and adults to be ambitious and realise their potential. To enable this, we need clear pathways which empower both young people and adults to make the right choices. We need to be responsive to emerging need, shaped by changes to the labour market such as growing and emerging sectors.

Ambition Priorities:

1. Overall Skills Levels: Improve the overall skills levels of Coventry residents

Our ambition: Bring skills levels for number of residents with no qualifications and numbers with NVQ1, 2 and 3 and above in line with National Averages.

We will achieve this by: Enable our primary schools, secondary schools, and further education (FE) colleges to continue to improve educational attainment through taking a multi-agency 'One Coventry' approach. Increase participation in Adult Education whilst maintaining quality.

2. Aspiration: An aspirational skills system that inspires residents to achieve through from primary school to lifelong learning

Our ambition: For high aspirations to be built into Coventry's Skills System from a young age (primary school) and to remain all the way through to lifelong learning.

We will achieve this by: Schools and FE providers supported to be aspirational, seeing the potential in their learners. Supporting schools to achieve the Gatsby Benchmarks, working in close partnership with careers advisors including the

Careers and Enterprise Company. Look after the wellbeing of young people and working in partnership to address barriers which can affect aspirations and attainment for young people.

Continue to push adult residents to be aspirational, with good quality careers advice and flexible course options which make use of the new 'Lifetime Skills Guarantee', and entitlements to flexible lifetime student finance from 2025 onwards.

3. Progression Pathways: Clearly built in throughout Coventry's skills system

Our ambition: Clearly defined routes through all educational levels which lead into good quality employment. For residents to easily re-engage in the skills system once in employment; continuing 'lifelong learning' and increasing their earning potential and facilitating career development.

We will achieve this by: Support Coventry's Education and Skills Providers to map clear pathways developed in partnership with local and regional employers and higher education providers. Ensure these are clearly defined and communicated to learners with co-design of courses between residents, education providers and employers where relevant. Ensure that learners see the value of their course and know the destination(s).

A skills ecosystem that ensures that all, including those most in need, are able to participate in, progress and achieve success

Coventry's Skills System needs to include all residents with no disparities in access, educational attainment, or progression. Skills Providers need sufficiently flexible provision, tailored delivery and content - including bespoke courses to support residents with different needs. We also need to work together to promote skills provision widely across the City and ensuring no residents view provision as 'not for them'.

4. Community: A skills system which meets the needs of all residents and is widely accessed by all Coventry communities

Our Ambition: Ensure all areas of the City are widely accessing skills support, at all levels and with good evidence of progression.

We will achieve this by: Support Skills Providers to have offers which are relevant, effectively communicated – including through close partnership work with community organisations, widely accessible (i.e blended learning and delivery within communities) and of high quality.

5. Inclusion: A skills system which is fully inclusive and representative of our diverse City

Our Ambition: Ensure all ethnic groups are well served by the skills system, ensuring engagement practices reflect our communities' needs and appropriate provision and support is available to enable full participation and progression at all educational levels.

We will achieve this by: Support Skills Providers to have offers which are widely accessible and effectively communicated (including in other languages). Ensure high participation in ESOL classes to remove language barriers from learning. Ensure progression from ESOL into higher level skills provision and work.

6. Highest Needs: A skills system which supports those most in need, supports people out of poverty and helps create a more equal City.

Ambition: Ensure Coventry's skills system is widely accessed by areas of higher deprivation and demonstrates progression into work - especially higher paying work. High participation of those who may be considered higher needs due to disability, health/mental health conditions, drug/alcohol misuse, lone parents, teenage parents, ex-offenders, and young people at risk of gang violence. Able to demonstrate a positive impact on people's general wellbeing.

We will achieve this by: Support Skills Providers to have offers which can be flexible and responsive in delivery and able to overcome barriers to attainment and progression. Strong community provision and good communication of offers. Strong progression pathways which support residents into good quality paid work. Clearly evidenced wellbeing benefits.

A flexible and responsive system that works together with our growing, investing and local businesses to deliver the right skills mix for our dynamic labour market

Coventry's skills system needs to support our businesses and encourage new businesses to invest in the City. It also needs to support these businesses to deliver on social value and provide the skills needed for the 'green' jobs of the future.

7. Skills for business: A skills system which provides the skills required by Coventry's businesses, both current and future and contributes to economic growth and the prosperity of the City

Our Ambition: Ensure Coventry businesses can find the skills to grow, including upskilling/reskilling existing workforces through in-work skills provision. Ensure Coventry has the skills base to attract inward investment. Maximise opportunities for residents to benefit from large developments such as the planned electric vehicle 'Battery Gigafactory'.

We will achieve this by: Effectively provide Skills Providers with labour market intelligence to ensure courses are designed to meet current and future skills needs. Strong links between employers and Skills Providers to provide suitable in work skills provision. Work in close partnership with Coventry City Councils Economic Development Service and their partners, aligning skills provision to Coventry City Councils Economic Development Strategy.

8. Social Value and Sustainability: A skills system which is well positioned to maximise increased commitment to social value and Coventry's commitment to tackling climate change

Ambition: Aligned skills provision to support residents to capitalise on social value opportunities generated through Coventry City Councils new Social Value Strategy. Ensure skills provision is geared towards jobs growth created by sustainability actions including those linked to the Net Zero 2050 Plan.

We will achieve this by: Working in close partnership with Coventry City Councils Procurement Team and strategic partners, especially large businesses through the Councils Anchor Alliance. Close partnership working with employers and industry bodies, supported by intelligence from regional and sub-regional bodies such as CWLEP, WMCA and FSB.

Questions:

Migration Team feedback

The Migration Team are particularly interested in the following areas that will contribute to the Skills Strategies high-level priorities and other parts that have a more operational focus.

1. What's your view on these 10 priorities? Describe the areas that you agree with and disagree with. Is the language of these priorities suitable?

Yes, we agree with all 10 priorities. There are clear areas of strength and synergy with our service, particularly against Points 2, 4, 5, and 7 and there are also some identified gaps below.

A skills section will form part of our Integration Strategy where we will add key priorities from the Skills Strategy, it will also include more details on sector-based academies and surveillance.

Point 4 'Community' and 5 'Inclusion' expand the wording to include "newly arrived communities", this sends a positive message to contributors and the community that the skills strategy helps to achieve for this group.

Points 2 and 7 there are missed opportunities for newly arrived school aged children and adults. Point 7 Newly arrived communities can help to fill some of the gaps of skills shortages for businesses and be part of the workforce for the future. There are challenges with former qualifications being recognised.

Newly arrived communities contribute to economic growth and employment and it is important they can access well-coordinated skills services, which recognise and meet their needs.

There is a lot we have learnt about barriers and the need for skills to be available and acquired flexibly.

Improving the position of those already in employment through well-developed personal plans to achieve their career aspirations. Within employment, progression should continue, with sustained skills journeys leading to better social and financial outcomes.

Links between formal classroom and community provision, to be flexible between the two to access support.

Provide opportunities to use spaces like the library to access support for newly arrived communities.

Include skills support for UAC (unaccompanied) young people – approximately 100 in the City.

2. Is there anything you would add? Any gaps?

Suggested wording to include in the Skills Strategy:

“To support integration the skills strategy commits to better access to skills for newly arrived communities. It recognises the skills refugees and the wider migrant population bring and aims to help people to pursue their ambitions.”

The city receives approximately on average 1,500 newly arrived individuals per year (this number increased last year due to the Afghan resettlement); it can take between 1-5 years to rebuild their lives from the day they arrive to become fully assimilated. Access to work is a key marker of integration

Engagement – How can we use lived experiences to help understand user journeys and respond on the ground? Engage the migrant population in processes to design and develop skills programmes.

Aspirational - Research and identify unused skills in the migrant population and local skills gaps and provide pathways to fill the skills gap. The West Midlands Strategic Migration Partnership is developing a regional resource to be applied to unused skills and better connections to the jobs market.

Practical Pathways to fill skills gaps - EDS (Business Advisors) working with businesses to provide pathways to fill skills gaps. Mi-Friendly Cities worked with the Chamber to complete a survey of SME's vacancy gaps, build on this work to offer practical pathways to jobless refugees and migrants into work.

Untapped potential of migrant and refugee women in employment and skills, re-engaging with women to build digital skills.

Working with individuals to develop entrepreneurial skills and talent and access business development services.

Point 8 – Social Value Policy - the inclusion of Refugees and Unaccompanied migrant children is not included as a group in the policy, this needs to be revisited.

3. What actions do you think Coventry should take to help achieve these priorities?

Please suggest:

-Actions that would support individual priorities

- Working with the Migration Team and partners to help newly arrived communities and refugees address the challenges and create bridges to access the skills support on offer.
- Actively engaging with clients to understand and provide the support they need.
- Actively engaging with the wider sector that works with these groups including organisations with specialist experience.
- Dialogue with employers to sign up to support newly arrived young people with developing basic skills and traineeships to become economically active.
- To broaden network of organisations that provide support and access to employment with additional support i.e., mentoring.
- Migration Team and Employment and Skills Team working together to deliver support and work on joint programmes i.e., UKSPF

-Actions that would support multiple priorities

Labour Market Integration for Newly arrived communities - lack of understanding of the labour market, pathways to employment and their options, including vocational training and apprenticeships, can limit their opportunities to gain meaningful employment, which makes best use of their skills.

- Provide clear communication on what skills support is available for newly arrived communities. Requires more comprehensive communication on the skills support offer to enable Liaison officers and others to provide information to clients.

- Specific communication on the different routes and journeys into skills and training i.e., eligibility and requirements to access apprenticeships, training, schools, courses.
- Work with networks across the city to engage in delivering skills support i.e., Refugee Employment Network
- The West Midlands Strategic Partnership would help to support and provide a general understanding of the processes and systems in place in this country.
- Employers' perceptions of refugees/newly arrived communities can limit opportunities and success in gaining employment. There is a lack of opportunities to gain experience, particularly through volunteering, work placements and work shadowing, which could lead to paid employment or provide references for job applications.
- Raising awareness of what our new communities can bring to the table, working with local businesses and partners to understand the needs and experience of newly arrived communities and what they can offer. Establish a campaign (sensitive use of media) to promote skills and experience and case studies.
- Build on the Mi-friendly Cities work on supporting employers to understand the checks that are required to employ refugees and HR team skills/training required to support this element.
- Shared apprenticeships schemes for sector-based working with a number of different employers, to gain the skills they require.

4. How could you and your organisation contribute to these priorities.

- Migration Team representation on the Skills Strategy strategic groups
- We can provide intelligence on newly arrived communities skills needs and challenges and work with employment hub to provide support.
- Engage with migrant groups and people when they arrive.
- Integration Strategy will contribute to delivering the Skills Strategies priorities linked to our service area.

- Can you make suggestions for how these priorities should be measured?

- People progressing towards goals to get a sense of individuals learning journey at the outset and how to accelerate the journey and measure the ongoing impact.

- Hard outcomes, those that are already employed and have got into higher skilled/paid employment.
- Social Value supporting newly arrived communities' skills development.
- Ask clients how they feel about the process? Have they really achieved what was promised when they started the programme?
- We can suggest targeted indicators once we have a clear idea of which priorities you will focus on for newly arrived communities.

EQUALITY IMPACT ASSESSMENT (EIA)



Title of EIA		Skills Strategy 2022-2030
EIA Author	Name	Glen Smailes
	Position	Business Development Manager
	Date of completion	12/9/2022
Head of Service	Name	Kim Mawby
	Position	Head of Employment and Skills
Cabinet Member	Name	Cllr K Sandhu & Cllr J O Boyle
	Portfolio	Education and Skills & Jobs, Regeneration and Climate Change

EIA	<ul style="list-style-type: none"> • Having identified an EIA is required, ensure that the EIA form is completed as early as possible. • Any advice or guidance can be obtained by contacting Jaspal Mann (Equalities), Mamta Kumar (Equalities), Alicia Philips (Health Inequalities), Lisa Young (Health Inequalities).
Sign Off	<ul style="list-style-type: none"> • Brief the relevant Head of Service/Director/Elected Member for sign off • Have the EIA Form ready for consultation if it is required • Amend according to consultation feedback and brief decision makers of any changes
Action	<ul style="list-style-type: none"> • Implement project / changes or finalise policy/strategy/contract • Monitor equalities impact and mitigations as evidence of duty of care

PLEASE REFER TO [EIA GUIDANCE](#) FOR ADVICE ON COMPLETING THIS FORM

SECTION 1 – Context & Background

1.1 Please tick one of the following options:

This EIA is being carried out on:

New policy / strategy

New service

Review of policy / strategy

Review of service

Commissioning

EQUALITY IMPACT ASSESSMENT (EIA)



Other project (*please give details*)

1.2 In summary, what is the background to this EIA?

This is an Equality Impact Assessment of the new Coventry Skills Strategy 2022-2030. This is primarily to ensure that the strategy, and more detailed interventions that are developed after rolling it out, eliminate unlawful discrimination, harassment and victimisation; advances equality of opportunity between different groups; and fosters good relations between different groups.

1.3 Who are the main stakeholders involved? Who will be affected?

The strategy and its roll out will affect and involve a wide range of stakeholders and partners. Although its implementation will be co-ordinated by CCC's Employment and Skills Service, it will involve and affect multiple Service Areas across the Council. The other key stakeholders that the strategy and its roll out will impact on include Coventry's skills providers (schools, colleges, universities, independent training providers), voluntary and community sector groups and businesses, as well as Business Representative Bodies and business support organisations. In light of this, the aforementioned stakeholders have all been consulted to agree the Strategy's priorities and key areas of focus.

Coventry residents will also be affected by the strategy, in that it will provide a 'framework for action' for improving skills outcomes across Coventry. This includes the raising of overall skills levels, building aspiration, improving progression pathways, ensuring our skills system; meets the needs of our communities, is inclusive and supports those with the highest needs, ensuring we get the right skills for businesses and providing the green skills to support action on climate change.

1.4 Who will be responsible for implementing the findings of this EIA?

Although Coventry City Council's Employment and Skills Service will be responsible for co-ordination and monitoring of the roll-out and implementation of this Strategy, the delivery of all interventions will entail partnership work with local, regional and national partners. As such, all of these organisations will need to take responsibility for implementing the findings of this EIA.

SECTION 2 – Consideration of Impact

Refer to guidance note for more detailed advice on completing this section.

In order to ensure that we do not discriminate in the way our activities are designed, developed and delivered, we must look at our duty to:

- Eliminate discrimination, harassment, victimisation and any other conflict that is prohibited by the Equality Act 2010



- Advance equality of opportunity between two persons who share a relevant protected characteristic and those who do not
- Foster good relations between persons who share a relevant protected characteristic and those who do not

2.1 Baseline data and information

Please include a summary of data analysis below, using both your own service level management information and also drawing comparisons with local data where necessary (go to <https://www.coventry.gov.uk/factsaboutcoventry>)

Economy – challenges and opportunities

In the 10 years after the 2008/09 recession, Coventry & Warwickshire was the fastest-growing local economy in England, with economic output (measured in real GVA) growing by 33.4% between 2008/09 and 2016/17.

However, the performance of the local economy has slowed, reducing the capacity to create new employment and training opportunities. For example, in 2018/2019, Coventry & Warwickshire recorded the lowest growth rate of all local economies (1.24%) and in 2020, the West Midlands experienced the biggest economic contraction of all regions due to the Covid-19 pandemic. This led to a significant increase in the Claimant Count (numbers claiming unemployment related benefits) from 7,825 (3.2%) in February to 16,490 (6.6%) in December 2020 (the peak pandemic level). This exacerbated longstanding inequalities in the city, with the highest increases in the Claimant Count seen in Coventry's most deprived wards.

An important objective of the Coventry Skills Strategy is to therefore ensure that Coventry's labour force is able to secure the necessary skills to enable them to access new opportunities that will emerge from structural economic change, and thereby enhance their standard of living. As an enabler of change, the Council will help our businesses to better reflect the communities they serve, encouraging employers to look at alternative methods of recruitment and to appoint more diverse workforces.

Demographics

Coventry's has a dynamic and adaptable labour force that could play an active role in supporting the economic recovery:

A young population: Coventry has a median age of 32 years compared to the UK average of 40. The pandemic in 2020 had a disproportionate impact on younger workers, due to the sectors most impacted by lockdowns, but through upskilling of the labour force (one of the central priorities within this strategy), this demographic could have an important role to play in accelerating the growth of emerging and expanding sectors of the economy.

Expected growth in 65+ age group: The 65+ age group is expected to become the fastest-growing demographic over the next 15 years, and the transferrable skills and experience of this demographic could again have an important role to play in facilitating economic restructuring. Those 75+ represent 6% of the



city's population compared to a UK average of 9%. However, by 2043 there is expected growth in 75+ residents of 8%.

A diverse City: 33% of Coventry's population are from ethnic minority backgrounds, compared to 20% for England as a whole. Coventry's population is expected to become more diverse: among schoolchildren, 48.7% of pupils are from ethnic backgrounds other than White British, and it will be essential that we ensure that any barriers these groups face in accessing employment and training opportunities are tackled within Coventry's skills system.

Becoming less economically deprived and more equal: The 2019 Indices of Multiple Deprivation (IMD) report showed significant improvements compared to 2015. Coventry moved from 34th most deprived Local Authority area to 64th. The number of neighbourhoods ranked within the most deprived 10% in the UK also decreased from 36 to 28. This improvement was driven in part by improving schools, a significant decrease in unemployment, supported by Coventry City Council's Job Shop, and rising resident wages. This Skills Strategy will contribute towards further reducing the number of neighbourhoods ranked within the most deprived 10% by providing residents in these areas with more access to good quality jobs and training opportunities.

Inequalities for women: Average weekly wages for women in Coventry are £173 less than those of male residents. This compares unfavourably to the national average gender pay gap of £97. Coventry also has statistically high numbers of economically inactive women with a gap of 9.6% between economically inactive women and men in Coventry which is larger than the National Average of 5.7%. A key focus of this Skills Strategy is ensuring that women in Coventry can access the best skills provision to help them into work or to progress to better paid roles, with courses delivered with the right flexibility.

Improving outcomes for disability and health conditions: Coventry has just over 10,000 residents claiming Employment Support Allowance, the main out of work benefit for people with disabilities and health conditions. This number has decreased in the last 5 years. Coventry has proportionally less people economically inactive due to long term sickness than the national averages. Coventry has been particularly successful in supporting residents with learning disabilities to progress straight from education into employment through our innovative Supported Internship programmes with University Hospital Coventry and Warwickshire (UHCW) and Warwick University, which have seen over 70% progress into paid work. This Skills Strategy seeks to increase innovative provision such as Supported Internships and ensure mainstream provision is sufficiently flexible to support the needs of people with disabilities and health conditions leading to good outcomes for these groups.

Still challenges in health outcomes: The Covid pandemic has exacerbated longstanding inequalities, especially in health outcomes with life expectancy varying by 10.7 years for men and 8.3 years for women between the City's most affluent and most deprived neighbourhoods. In delivering this strategy, we will work with businesses to tackle longstanding health inequalities, through increasing investment in skills and apprenticeships, implementation of fairer working practices and paying more staff the real living wage, engaging Trade Bodies, Unions and other relevant stakeholders in the process



Labour Market:

The characteristics of Coventry's labour force will influence the focus of where our skills support activities need to be over the next five years:

High employment in professional occupations: 26.4%, compared to a National Average of 23.3%. There is a high concentration of public sector employment: Coventry City Council, one of the largest Job Centres in the country, a large regional hospital and offices for several national civil service bodies such as The Department for Education and the Local Government and Social Care Ombudsman. Also, two large Universities which combined employ over 11,000 people, many in Professional Occupations, including engineering specialisms in support of Coventry's advanced engineering research and development. There will continue to be a need for labour with the requisite generic, leadership and management, and technical skills to fill new roles, so it is vital that we enable the local education and training system to produce a local labour force with these vital skills.

Strong employment in manufacturing sector: 6.1% of Coventry's workforce compared to a national average of 5.6%. Although the Covid pandemic caused a contraction of 2,300 jobs in this sector, advanced manufacturing & engineering is a sector where we aspire to create further growth (notably through growing electric vehicle and battery supply chains). It is therefore crucial that our skills system continues to produce a supply of local labour with the required high-level technical skills.

Low proportion of residents employed as Managers, Directors and Senior Officials: 5% compared to a national average of 10.9%, although this is in part due to many of those working in these roles in Coventry businesses commuting from outside the city. A key objective within the Skills Strategy is to raise aspirations of Coventry residents across all neighbourhoods, and expand provision and maximise take-up of Leadership & Management training to enable more Coventry residents to progress into these types of roles.

Higher than average vacancy numbers: As with much of the UK over the last year Coventry has had higher than average numbers of vacancies. Employers particularly struggled to fill roles in hospitality and logistics, Health & Social Care (notably nursing roles in the NHS), and programme and software development roles across a range of sectors. This is a further challenge slowing the economic recovery, especially as many of these sectors employed high volumes of "EU nationals", who have since left the UK labour market. We will therefore work with employers, trade bodies unions, and training providers to ensure that training courses are designed in a way that delivers the skills the sectors need, and to identify Coventry residents that could potentially benefit from upskilling and fill the vacancies.

Many vacancies are low skilled/low paid and insecure: Skills solutions can support sectors experiencing labour shortages, however for many of the roles available the issue is more 'labour' as opposed to 'skills' shortage. Many roles in logistics, hospitality and care for example require elementary skills, have limited entry requirements, are lower paid and more insecure and struggle to attract candidates as a result. We will therefore work with employers, trade bodies and unions to drive improvements in the terms of employment within these sectors and develop and promote clearer career development paths. We will



also provide support to these businesses in tackling recruitment challenges, and through the Job Shop, match local residents that could potentially fill new vacancies.

The above data, a citywide skills survey and widespread consultation with various stakeholders informed the developing of 3 Strategic Ambitions which contain 8 Priorities. These serve as a 'framework for action' and the Action Groups delivering these priorities will ensure positive impacts for all 'protected groups'. The Strategic Ambitions and Priorities are set out below:

Strategic Ambition 1: A comprehensive, citywide skills offer that raises aspirations and allows each and every resident throughout their lives to reach their full potential.

1. **Skills Levels:** To improve the overall skills levels of Coventry residents.
2. **Aspiration:** Further develop a skills system that inspires residents to achieve from primary school through to lifelong learning.
3. **Progression Pathways:** Providing a clear line of sight for people to progress through Coventry's skills system.

Strategic Ambition 2: A skills ecosystem which ensures that all, including those most in need, are able to participate in, progress and achieve success.

4. **Community:** A skills system which meets the needs of all residents and is widely accessed by all Coventry communities, including newly arrived communities.
5. **Inclusion:** A skills system which is fully inclusive and representative of our diverse City.
6. **Highest Needs:** A skills system which supports those most in need, with a 'proportionate universalism'¹ approach, helping people out of poverty and creating a more equal City.

Strategic Ambition 3: A flexible and responsive system that works together with our growing, investing and local businesses to deliver the right skills mix for our dynamic labour market.

7. **Skills for business:** A skills system which provides the skills required by Coventry's businesses, both current and future and contributes to economic growth and the prosperity of the City and Region.
8. **Social Value and Sustainability:** A skills system which is well positioned to maximise increased commitment to social justice, respect, community, and responsibility including Coventry's commitment to tackling climate change.

There are also 3 shared priorities with the Economic Development Strategy:

¹ 'Proportionate Universalism' is an approach developed by Sir Michael Marmot and applied throughout health and other services in the UK. The resourcing and delivering of universal services is at scale and intensity proportionate to the degree of need.



Shared goals with the Economic Development Strategy

The Skills Strategy is fully integrated with Coventry City Council’s new Economic Development Strategy 2022-2025.* Through the two strategies we will achieve three common goals:

1. **Getting the skills and opportunities right for investment:** Develop a ‘team around’ approach for investments and large developments with expertise brought together from across the Council to ensure early, comprehensive planning better meets business need and ensures maximum benefit for Coventry.
2. **Co-designing skills solutions with businesses:** Designing together with industry and skills partners to ensure the skills system is responsive, innovative and produces the right skills mix for now and the future. This includes supporting employers to maximise social value commitments.
3. **In-work upskilling with local employers:** Collaborations which encourage access to skills and workplace development at all levels.

2.2 On the basis of evidence, complete the table below to show what the potential impact is for each of the protected groups.

- Positive impact (P),
- Negative impact (N)
- Both positive and negative impacts (PN)
- No impact (NI)
- Insufficient data (ID)

**Any impact on the Council workforce should be included under question 2.6 – not below*

Protected Characteristic	Impact type P, N, PN, NI	Nature of impact and any mitigations required
Age 0-18	P	The Coventry Skills Strategy will positively impact this group by: Raising grades at all stages Building aspiration – inspiring young people to believe in their future and be inspired to achieve to reach their goals Progression pathways will be developed to provide clear line of sight for young people as they progress through Coventry’s skills system.

EQUALITY IMPACT ASSESSMENT (EIA)



		<p>Ensuring the skills system for 0-18 year olds is fully inclusive and supports those with the highest needs. This includes securing equality of outcomes.</p> <p>Ensuring young people are given the skills employers need to support their future careers and inspiring young people to consider 'green' future careers.</p>
Age 19-64	P	<p>The Coventry Skills Strategy will positively impact this group by: Raising grades at all stages and raising overall City skills levels through increased uptake of adult learning both within and outside of the workplace.</p> <p>Building aspiration – inspiring people to believe in their future and to understand that it is never too late to learn.</p> <p>Progression pathways will be developed to provide clear line of sight for all age learners ensuring they see the value in the courses they take.</p> <p>Ensuring the adult skills system is fully inclusive and supports those with the highest needs. This includes securing equality of outcomes. Ensuring adults are given the skills employers need to support their future careers and providing 'green skills' to support residents into current and future 'green' jobs.</p>
Age 65+	P	<p>The Coventry Skills Strategy will positively impact this group by: Raising grades at all stages and raising overall City skills levels through increased uptake of adult learning both within and outside of the workplace.</p> <p>Building aspiration – inspiring people to believe in their future and to understand that it is never too late to learn.</p> <p>Progression pathways will be developed to provide clear line of sight for all age learners ensuring they see the value in the courses they take.</p> <p>Ensuring the adult skills system is fully inclusive and supports those who are 65+ with the highest needs. This includes securing equality of outcomes. Ensuring skills provides make necessary reasonable adjustments to provide positive learning environments for people who are 65+.</p> <p>Ensuring adults are given the skills employers need to support their careers and providing 'green skills' to support residents into current and future 'green' jobs.</p>
Disability	P	<p>The Coventry Skills Strategy will positively impact this group by: Raising grades at all stages and raising overall City skills levels through increased uptake of adult learning both within and outside of the workplace.</p>

EQUALITY IMPACT ASSESSMENT (EIA)



		<p>Building aspiration – inspiring people with disabilities to believe in their future and to understand that it is never too late to learn. Progression pathways will be developed to provide clear line of sight for all age learners, including those with disabilities, ensuring they see the value in the courses they take.</p> <p>Ensuring the adult skills system is fully inclusive and supports those with the highest needs including those with disabilities. This includes securing equality of outcomes. Ensuring skills provides make necessary reasonable adjustments to provide positive learning environments for people with disabilities.</p> <p>Ensuring adults with disabilities are given the skills employers need to support their careers. Encouraging employers to create opportunities for residents with disabilities i.e job carving. Providing ‘green skills’ to support residents with disabilities into current and future ‘green’ jobs.</p>
Gender reassignment	p	<p>The Coventry Skills Strategy will positively impact this group by: Raising grades at all stages for all groups, including those who have gone through or are in the process of gender reassignment and raising overall City skills levels through increased uptake of adult learning both within and outside of the workplace.</p> <p>Building aspiration – inspiring people who have gone through or are in the process of gender reassignment to believe in their future and to understand that it is never too late to learn.</p> <p>Progression pathways will be developed to provide clear line of sight for all age learners, including those who have gone through or are in the process of gender reassignment, ensuring they see the value in the courses they take.</p> <p>Ensuring the adult skills system is fully inclusive and supports those with the highest needs including those who have gone through or are in the process of gender reassignment. This includes securing equality of outcomes. Ensuring skills provides make necessary reasonable adjustments to provide positive learning environments for people who have gone through or are in the process of gender reassignment.</p> <p>Ensuring those who have gone through or are in the process of gender reassignment are given the skills employers need to support their careers. Encouraging employers to be positive about employing people who have gone through or are in the process of going through gender reassignment. Providing ‘green skills’ to support these residents into current and future ‘green’ jobs.</p>
Marriage and Civil Partnership	p	<p>The Coventry Skills Strategy will positively impact this group by:</p>

		<p>Raising grades at all stages including for adults in marriages and civil partnerships and raising overall City skills levels through increased uptake of adult learning both within and outside of the workplace. Building aspiration – inspiring people from all groups including those in marriages and civil partnerships to believe in their future and to understand that it is never too late to learn.</p> <p>Progression pathways will be developed to provide clear line of sight for all age learners, including adults in marriages and civil partnerships, ensuring they see the value in the courses they take. Ensuring the adult skills system is fully inclusive and supports those from all communities including adult in marriages and civil partnerships.</p> <p>Ensuring adults in marriages and civil partnerships are given the skills employers need to support their careers. Encouraging employers to be positive about employing people from all backgrounds including residents in marriages and civil partnerships. Providing ‘green skills’ to support these residents into current and future ‘green’ jobs.</p>
<p>Pregnancy and maternity</p>	<p>P</p>	<p>The Coventry Skills Strategy will positively impact this group by:</p> <p>Building aspiration – inspiring residents who are pregnant or on maternity leave to believe in their future and to understand that it is never too late to learn.</p> <p>Progression pathways will be developed to provide clear line of sight for all age learners, including young people and adults who are pregnant or on maternity leave, ensuring they see the value in the courses they take.</p> <p>Ensuring the adult skills system is fully inclusive and supports those who are pregnant or mothers to learn and achieve good outcomes. Ensuring skills provides make necessary reasonable adjustments to provide positive learning environments for pregnant women and mothers.</p> <p>Ensuring adults in marriages and civil partnerships are given the skills employers need to support their careers. Encouraging employers to be positive about employing people from all backgrounds including pregnant women and those returning from maternity. Providing ‘green skills’ to support these residents into current and future ‘green’ jobs.</p>



<p>Race (Including: colour, nationality, citizenship ethnic or national origins)</p>	<p>P</p>	<p>The Coventry Skills Strategy will positively impact this group by: Raising grades for ethnic minorities at all educational stages and raising overall City skills levels for adults from ethnic minorities through increased uptake of adult learning both within and outside of the workplace. Building aspiration – inspiring young people from ethnic minorities to believe in their future. Inspiring adults from ethnic minorities to have high career aspirations and understand that it is never too late to learn. Progression pathways will be developed to provide clear line of sight for all age learners from ethnic minorities ensuring they see the value in the courses they take. Ensuring the adult skills system is fully inclusive and supports those from ethnic minorities, including those with the highest needs. This includes securing equality of outcomes. Ensuring skills provides make necessary reasonable adjustments to provide positive learning environments for ethnic minorities. Ensuring young people and adults from ethnic minorities are given the skills employers need to support their careers. Working with employers to prevent discrimination against people from ethnic minorities. Providing ‘green skills’ to support resident from ethnic minorities into current and future ‘green’ jobs.</p>
<p>Religion and belief</p>	<p>P</p>	<p>The Coventry Skills Strategy will positively impact this group by: Raising grades for young people from all religions and beliefs at all educational stages and raising overall City skills levels for adults from different religions and beliefs through increased uptake of adult learning both within and outside of the workplace. Building aspiration – inspiring young people from all religions and beliefs to believe in their future. Inspiring adults from all religions and beliefs to have high career aspirations and understand that it is never too late to learn. Progression pathways will be developed to provide clear line of sight for all age learners from different religions and beliefs ensuring they see the value in the courses they take. Ensuring the adult skills system is fully inclusive and supports those from different religions and beliefs, including those with the highest needs. This includes securing equality of outcomes. Ensuring skills provides make necessary reasonable adjustments to provide positive learning environments for people from all religions and beliefs. Ensuring young people and adults from ethnic minorities are given the skills employers need to support their careers and providing</p>

		<p>'green skills' to support residents from all religions and beliefs into current and future 'green' jobs.</p>
Sex	P	<p>The Coventry Skills Strategy will positively impact this group by: Raising grades for all genders at all educational stages and raising overall City skills levels for adults from all genders through increased uptake of adult learning both within and outside of the workplace. Building aspiration – inspiring young people from all genders to believe in their future. Inspiring adults from all genders to have high career aspirations and understand that it is never too late to learn. Progression pathways will be developed to provide clear line of sight for all age learners from different religions and beliefs ensuring they see the value in the courses they take. Ensuring the adult skills system is fully inclusive and supports those from all genders, including those with the highest needs. This includes securing equality of outcomes. Ensuring skills provides make necessary reasonable adjustments to provide positive learning environments for people from all genders. Ensuring young people and adults from all genders are given the skills employers need to support their careers and providing 'green skills' to support residents from all genders into current and future 'green' jobs.</p>
Sexual orientation	P	<p>The Coventry Skills Strategy will positively impact this group by: Raising grades for people of all sexual orientations at all educational stages and raising overall City skills levels for adults from all sexual orientations through increased uptake of adult learning both within and outside of the workplace. Building aspiration – inspiring young people of all sexual orientations to believe in their future. Inspiring adults of all sexual orientations to have high career aspirations and understand that it is never too late to learn. Progression pathways will be developed to provide clear line of sight for all age learners of all sexual orientations ensuring they see the value in the courses they take. Ensuring the adult skills system is fully inclusive and supports those of all sexual orientations including those with the highest needs. This includes securing equality of outcomes. Ensuring skills provides make necessary reasonable adjustments to provide positive learning environments for people of all sexual orientations. Ensuring young people and adults of all sexual orientations are given the skills employers need to support their careers and providing 'green skills' to support residents of all sexual orientations into current and future 'green' jobs.</p>



HEALTH INEQUALITIES

<p>2.3</p>	<p>Health inequalities (HI) are unjust differences in health and wellbeing between different groups of people which arise because of the conditions in which we are born, grow, live, work and age. These conditions influence our opportunities for good health, and result in stark differences in how long we live and how many years we live in good health.</p> <p>Many issues can have an impact: income, unemployment, work conditions, education and skills, our living situation, individual characteristics and experiences, such as age, gender, disability and ethnicity</p> <p>A wide range of services can make a difference to reducing health inequalities. Whether you work with children and young people, design roads or infrastructure, support people into employment or deal with welfare benefits – policy decisions and strategies can help to reduce health inequalities</p> <p>Please answer the questions below to help identify if the area of work will have any impact on health inequalities, positive or negative.</p> <p>If you need assistance in completing this section please contact: Alicia Philips or Lisa Young in Public Health for more information. More details and worked examples can be found at https://coventrycc.sharepoint.com/Info/Pages/What-is-an-Equality-Impact-Assessment-(EIA).aspx</p>	
<p>Question</p>	<p>Issues to consider</p>	
<p>2.3a What HIs exist in relation to your work / plan / strategy</p>	<ul style="list-style-type: none"> • Explore existing data sources on the distribution of health across different population groups (<i>examples of where to find data to be included in support materials</i>) • Consider protected characteristics and different dimensions of HI such as socio-economic status or geographical deprivation 	
	<p>Response:</p> <p>The Health Inequalities most pertinent to this area of work are similar to those baseline challenges identified when Coventry secured Marmot City status. Namely that where someone is born, where they live, whether they work or not and what they do all affect how long someone will live, how healthy they will be and what quality of life they will experience. Men in the most affluent areas of the city will live, on average, 10.7 years longer than men in the most deprived areas, while for women the difference is 8.4 years.</p> <p>The Economic Development Service, working with key local and regional partners, and other Service Areas within the Council, has played an active part in forming the Council's</p>	



	<p>response to the Call to Action, and will continue to do so through the implementation of this new Economic Development Strategy and the interventions that will be delivered as part of this.</p>
<p>2.3b How might your work affect HI (positively or negatively). How might your work address the needs of different groups that share protected characteristics</p>	<p>Consider and answer below:</p> <ul style="list-style-type: none"> ● Think about whether outcomes vary across groups and who benefits the most and least, for example, the outcome for a woman on a low income may be different to the outcome for a woman a high income ● Consider what the unintended consequences of your work might be
	<p>Response:</p> <p style="padding-left: 40px;">a. Potential outcomes including impact based on socio-economic status or geographical deprivation</p> <p>The Coventry Skills strategy aims to raise skills levels for all residents and encourage resident aspiration. Whilst there is a focus on all residents the strategy recognises that more attention needs to be directed to more deprived areas of the City, using a ‘proportionate universalism approach’. One of the priorities of the Coventry Skills Strategy is that the skills system ‘meets the needs of all residents and is widely accessed by all Coventry communities, including newly arrived communities.’ There will be an Action Group focusing on this priority, ensuring that the strategies other priorities such as raising skills levels, building aspiration and providing the skills that employers need are equally benefiting all communities, especially deprived communities.</p> <p>Through the focus on communities, the Coventry Skills Strategy will have a positive impact on the socio-economic status of many city residents. There will be a focus on ensuring that residents from more deprived communities are given the skills they need to secure employment and to progress within employment to higher paying roles. The Coventry Skills Strategy is fully integrated with the Economic Development Strategy and shared goals around getting the skills right for investment, co-designing skills solutions with businesses and in work upskilling with local employers. These shared goals will provide businesses with the skills they need to grow and invest in the City which will lead to more jobs for local people, including growth in higher paid roles. Crucially both strategies recognise the need to work closely with businesses around social value to ensure that jobs growth benefits local residents, particularly residents from more deprived communities.</p>



- b. Potential outcomes impact on specific socially excluded or vulnerable groups eg. people experiencing homelessness, prison leavers, young people leaving care, members of the armed forces community.

The Coventry Skills strategy aims to raise skills levels for all residents and encourage resident aspiration. Whilst there is a focus on all residents the strategy recognises that more attention needs to be directed to socially excluded or vulnerable groups using a ‘proportionate universalism approach’. One of the priorities of the Coventry Skills Strategy is that the skills system effectively supports those who may be considered to have the highest needs such as people experiencing homelessness, prison leavers, young people leaving care, members of the armed forces community, people with disabilities, victims of domestic violence and those with substance misuse issues. There will be an Action Group focusing on this priority, ensuring that the strategies other priorities such as raising skills levels, building aspiration and providing the skills that employers need are equally benefiting those with higher need. We will ensure that skills providers

2.4 Next steps - What specific actions will you take to address the potential equality impacts and health inequalities identified above?

The Action Groups responsible for actioning the priorities of the Coventry Skills Strategy be actively involved in supporting Public Health and other Service areas and partners to reduce health inequalities. The Action Groups will work with skills providers at all levels to raise skills levels for all Coventry communities with more attention directed to more deprived areas of the City, using a ‘proportionate universalism approach’. There will also be actions focused on building aspiration for all communities and ensuring that all communities are gaining the skills that they need to secure good quality work, and to progress within the workplace. This includes actions to ensure that the skills system is fully inclusive and supporting those with ‘higher needs’.

The Coventry Skills Strategy (alongside Economic Development Strategy) pledges to work with businesses to tackle longstanding health inequalities, through increasing investment in skills and apprenticeships, implementation of fairer working practices and paying more staff the real living wage, engaging Unions and Trade Bodies in the process. We will also continue to support businesses in addressing recruitment challenges, which will entail co-designing training programmes alongside training providers, and (where possible) matching local jobseekers with new vacancies to reduce risks of worklessness widening health inequalities.

DIGITAL INCLUSION

2.5 The Covid-19 pandemic accelerated the uptake of digital services nationally, whereby people who are digitally enabled have better financial opportunities, can access new information and are better connected to others (Lloyds Consumer Digital Index, 2021). However, for those who are digitally excluded, the digital divide has grown during the last two years, and without intervention people will be left behind with poorer outcomes across employment, health and wellbeing, education and service access. Some people are more likely to be excluded including: older people, people from lower income households, unemployed people,

EQUALITY IMPACT ASSESSMENT (EIA)



	<p>people living in social housing, disabled people, school leavers before 16 with fewer educational qualifications, those living in rural areas, homeless people, or people who's first language is not English (NHS Digital.)</p> <p>Some of the barriers to digital inclusion can include lack of:</p> <ul style="list-style-type: none"> • Access to a device and/or data • Digital skills • Motivation to get online • Trust of online safety <p>Digital exclusion is not a fixed entity and may look different to different people at different times.</p> <p>Example 1. Person A, has access to a smartphone and monthly data and can access social media apps, however lacks the digital skills and confidence, and appropriate device to create a CV, apply for jobs and attend remote interviews, and/or access educational and skills resources.</p> <p>Example 2. Person B, is digitally confident and has their own laptop, however due a lower household income and other financial priorities, they cannot afford their monthly broadband subscription and can no longer get online to access the services they need to.</p> <p>Example 3. Person C has very little digital experience and has heard negative stories on the news regarding online scams. Despite having the financial resource, they see no benefit of being online and look for alternatives whenever possible. A new council service requires mandatory online registration, therefore they do not access it.</p> <p>It is important that we all consider how we can reduce digital inequalities across our services, and this may look very different depending on the nature of our work.</p> <p>Please answer the questions below to help identify if the area of work will have any impact on digital inequalities, positive or negative.</p> <p>If you need assistance in completing this section please contact: Laura Waller (<i>Digital Services & Inclusion Lead, CCC</i>). More details and worked examples can be found at https://coventrycc.sharepoint.com/Info/Pages/What-is-an-Equality-Impact-Assessment-(EIA).aspx</p>	
Question	Issues to consider	
<p>2.5 What digital inequalities exist in relation to your work / plan / strategy?</p>	<ul style="list-style-type: none"> • Does your work assume service users have digital access and skills? • Do outcomes vary across groups, for example digitally excluded people benefit the least compared to those who have digital skills and access? • Consider what the unintended consequences of your work might be. 	
	<p>Response:</p>	



<p>The Coventry Skills Strategy is city-wide in scope and therefore does not consider all to have equal digital access and skills. The Strategy’s priorities around community, inclusion and supporting those who may be considered to be ‘higher needs’ recognises this. Action Groups working on these priorities will work with skills providers to ensure that digital barriers do not prevent some from accessing courses and progressing. For example, if a course is planned to be delivered online or with a blended approach the skills provider needs to ensure that they have a plan for learners who do not have digital access at home i.e they can use classroom facilities or be given a device and data/broadband access. Ensuring that there is good access for all to gain digital skills will also be a key action in promoting inclusion and ensuring the Coventry skills system is supporting all communities.</p> <p>A Citywide Skills Survey undertaken between Nov 2021 – Jan 2022 showed that 54% of respondents wanted ‘blended’ online and classroom courses with 22% wanting online only. However, 26% of respondents wanted classroom only, which showed that there is still a significant proportion of residents who either cannot access online provision or prefer not to learn in this way. It is crucial therefore that skills providers do not exclude these groups.</p>	
<p>2.5b How will you mitigate against digital inequalities?</p>	<ul style="list-style-type: none"> • If any digital inequalities are identified how can you reduce these? For e.g. if a new service requires online registration you may work with partner organisations to improve digital skills and ensure equitable processes are available if someone is unable to access online.
	<p>Response: As detailed above the Skills Strategy Action Groups will work with all skills providers as well as community partners to improve digital skills across the city and ensure that device access barriers are addressed.</p>

2.6 How will you monitor and evaluate the effect of this work?

We will continue to hold an Annual Skills Survey which will look at whether digital barriers are preventing residents from accessing skills courses. As with our previous survey there will be readily available offline versions of the survey to ensure good representation from residents with digital barriers.

We will continue to engage with businesses in partnership with our Economic Development Service to understand if businesses are struggling to recruit Coventry residents with the right levels of digital skills. We will also be informed by local and regional data on digital skills levels.

EQUALITY IMPACT ASSESSMENT (EIA)



2.7 Will there be any potential impacts on Council staff from protected groups?

There will be no additional impacts on Council staff from protected groups.

You should only include the following data if this area of work will potentially have an impact on Council staff. This can be obtained from: Nicole.Powell@coventry.gov.uk

Headcount:

Sex:

Female	
Male	

Age:

16-24	
25-34	
35-44	
45-54	
55-64	
65+	

Disability:

Disabled	
Not Disabled	
Prefer not to state	
Unknown	

Ethnicity:

White	
Black, Asian, Minority Ethnic	
Prefer not to state	
Unknown	

Religion:

Any other	
Buddhist	
Christian	
Hindu	
Jewish	
Muslim	
No religion	
Sikh	
Prefer not to state	
Unknown	

Sexual Orientation:

Heterosexual	
LGBT+	
Prefer not to state	
Unknown	

3.0 Completion Statement

As the appropriate Head of Service for this area, I confirm that the potential equality impact is as follows:

EQUALITY IMPACT ASSESSMENT (EIA)



- No impact has been identified for one or more protected groups**
- Positive impact has been identified for one or more protected groups
- Negative impact has been identified for one or more protected groups
- Both positive and negative impact has been identified for one or more protected groups

4.0 Approval

Signed: Head of Service: Kim Mawby, Head of Employment and Skills	Date: 9th September 2022
Name of Director: Kirston Nelson, Chief Partnerships Officer/ Director of Education and	Date sent to Director
Name of Lead Elected Members: Cllr K Sandhu, Cabinet Member for Education and Skills Cllr J O'Boyle, Cabinet Member for Jobs, Regeneration and Climate Change	Date sent to Councillors:

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To: Cabinet

Date: 11th October 2022

Subject: Coventry Skills Strategy 2022-2030

1 Purpose of the Note

- 1.1 To inform Cabinet of the recommendations from Scrutiny Co-ordination Committee following their consideration of the Coventry Skills Strategy 2022-2030

2 Recommendations

2.1 Cabinet is recommended to:

- 1) Approve the adoption of the Coventry Skills Strategy 2022-2030
- 2) That annual performance data on the strategy is presented to the appropriate scrutiny board.

3 Background and Information

3.1 Members of the Committee considered the Cabinet Report and the Committee asked a number of questions and the following points were discussed:

- How the performance and the success of the strategies would be measured, including the indicators the One Coventry Plan
- The frequency of performance reporting of the strategies to Scrutiny
- Reassurances were given about the viability of Coventry College. It was acknowledged there were challenges in getting lectures in certain trade subjects and options to address this gap were being explored.
- How the strategies would be communicated to, and benefit Coventry communities was discussed
- The role and purpose of Equality Impact Assessments was outlined in relation to the development of new strategies
- Opportunities to upskill over 50s given the current retirement age and that people may need to stay in work longer given the rising cost of living
- Opportunities to upskills parents and link with Early Help Partnership to enhance skills. Opportunities to make training flexible and modular around family commitments were being looked at to make it as inclusive as possible.
- Narrowing the attainment gap at GCSE level would be discussed by Education and Children's Services Scrutiny Board 2
- Limitations of the consultation on the skills strategy were discussed. Although the response rate was disappointing, new information was gained from undertaking it and the survey would run annually and try and increase its reach based on lessons learnt.
- Apprenticeships were a key focus for the skills strategy both within the City Council and in other organisations. Certain groups were targeted for support including those with barriers to

employment. The parts of the Apprenticeship Levy had been transferred to other organisations to help ensure it was spent within the City.

- A work experience offer was being redeveloped following a lull due to the pandemic.
- Support for women from BAME backgrounds to access training and therefore employment

4 Health Inequalities Impact

- 4.1 A full Equalities Impact Assessment has been completed for the new strategy including Health Inequalities.

Gennie Holmes
Scrutiny Co-ordinator
024 7697 1857



Cabinet

11th October 2022

Name of Cabinet Member:

Cabinet Member for Policing and Equalities – Councillor A S Khan
Cabinet Member for Housing and Communities – Councillor D Welsh

Director Approving Submission of the report:

Director of Streetscene and Regulatory Services

Ward(s) affected:

All

Title:

Review of Policy for Enforcing Standards in Private Sector Housing 2022

Is this a key decision?

No – although this matter affects all wards in the city, the impact is not expected to be significant.

Executive Summary:

The provision of good quality housing for Coventry residents is a priority for the City Council.

Government have legislated to provide local authorities with additional powers to tackle poor quality homes in the Private Rented Sector (PRS).

The Council approved its enforcement policy for enforcing standards in private sector housing in 2018.

This policy has now been reviewed following the introduction of additional powers and legislation and the report therefore seeks approval of the attached “Policy for Enforcing Standards in Private Sector Housing 2022”, which now incorporates those additional powers and provides an effective framework for all future housing enforcement activities in the city.

Recommendations:

The Cabinet is requested to:

1. Consider and approve the amended “Policy for Enforcing Standards in Private Sector Housing 2022” attached at Appendix 1 to the report.

2. Authorise the Director of Streetscene and Regulatory Services to implement the policy as detailed in the report and delegate authority to the Strategic Lead for Regulation to issue, use, amend and enforce civil penalties and all other enforcement powers as set out in the revised "Policy for Enforcing Standards in Private Sector Housing 2022".

List of Appendices included:

Appendix 1 Policy for Enforcing Standards in Private Sector Housing 2022 and policy appendices (Policy Appendix 1 – Acts and Regulations; Policy Appendix 2 – Civil Penalties under the Housing and Planning Act 2016; Policy Appendix 3 – Civil Penalties under the Tenant Fees Act 2019; Policy Appendix 4 – Civil Penalties under the Electrical Safety Standards Regulations 2020; Policy Appendix 5 – Penalties under the Minimum Energy Efficiency Standards 2018; Policy Appendix 6 – Fit and Proper Person for Caravan Licensing; Policy Appendix 7 – Database of Rogue Landlords).

Appendix 2 Equality and consultation analysis form.

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?

No

Will this report go to Council?

No

Report title: Review of Policy for Enforcing Standards in Private Sector Housing 2022

1. Context (or background)

- 1.1. In recent years, the Government have introduced a patchwork of legislation designed to strengthen consumer protection for tenants and tackle rogue landlords and these were included in the Council's Policy for Enforcing Standards in Private Sector Housing 2021.
- 1.2. In order for the Council to use these powers it must publish a policy setting out how it will implement the legislation in relation to properties in the PRS and review how these powers are adopted.
- 1.3. Coventry City Council has reviewed its policy which, if approved will take effect from the date of approval by Cabinet.
- 1.4. This will be managed within existing resources and compliments and supports the work carried out under Additional and Mandatory Licensing Schemes.
- 1.5. A copy of the revised policy is attached as Appendix 1 to the report. In summary the new policy includes amendments to updated legislation such as the Smoke and Carbon Monoxide Regulations and provides a decision-making mechanism and criteria for adopting the powers to place someone on the Rogue Landlord Database.

2. Options considered and recommended proposal

- 2.1. **Do nothing** - This option is not recommended because this would prevent the use of the full suite of powers in relation to the PRS available to the City Council. This could affect the Council's ability to help protect the health, safety and welfare of tenants in Coventry.
- 2.2. **Approve the policy – This is the preferred option.** In order for the Council to proceed with implementing the legislation provided it must have published a policy. Without this the Council is not able to use the powers. Therefore, the Cabinet are requested to approve the policy for Enforcing Standards in Private Sector Housing and adopt the approach set out in the appropriate appendices for dealing with the implementation of civil penalties.

3. Results of consultation undertaken

- 3.1. The enforcement measures open to the Council are set out in legislation and consultation is unnecessary for the Council to be able to use them.

4. Timetable for implementing this decision

- 4.1. The policy must be published first to allow the Council to implement civil penalties. The implementation can commence once the report has been approved and the policy is published. It is proposed that the revised policy will take effect from the date it is approved by Cabinet.

5. Comments from the Chief Operating Officer (Section 151 Officer) and the Director of Law and Governance

5.1. Financial implications

The financial implications associated with the recommendation are limited to the employee costs associated with implementing the policy and any costs involved in publishing the policy document. These costs will be managed within existing resources.

Enforcement authorities will be able to retain the money raised through financial penalties with this money reserved for future housing enforcement in the private rented sector as set out in statutory guidance.

5.2. Legal implications

Each statutory instrument sets out the provisions of the legislation and is supported by regulations, statutory guidance and non-statutory guidance which the Council will have regard to when deciding upon its enforcement activities.

The Council will not be able to undertake its role of regulating the PRS through the use of these powers unless it has approved and published its policy.

The regulatory function in relation to the policy will be carried out by the Regulatory Service through officers exercising delegated powers. The one exception is the approval of the policy statement, which must be approved by Cabinet.

The Council is required to have regard to any current Government guidance when carrying out any regulatory activities under legislation.

6. Other implications

6.1. How will this contribute to achievement of the Council's Plan?

The One Coventry Plan 2022-2030 is currently being finalised and sets out the Council's vision and priorities for the city, with a vision of working together to improve our city and the lives of those who live, work and study here by creating a city where our residents get the best possible start in life, experience good health and age well and are protected and valued as residents and communities.

Housing is a key determinant of health and as a Marmot City the Council recognises the importance reducing health inequalities. The Council's Housing and Homelessness Strategy 2019-2024 affirms this view and also acknowledges that housing plays a crucial role in the economic growth of the city.

The PRS plays a fundamental role in providing affordable housing and the ambition for Coventry is "*to improve the use of existing homes*".

The Housing Strategy links into the Council Plan and the Health and Wellbeing Strategy by contributing to the delivery of the key corporate priorities but also in supporting the local economy through ensuring communities have stable and safe places to live.

6.2. How is risk being managed?

If the Policy for Enforcing Standards in Private Sector Housing is not approved, the City Council will not be able to perform its full regulatory functions through the use of the range of enforcement powers it has at its disposal.

The policy will inform decisions taken by regulatory services that will have an impact on the interests of private landlords, agents and tenants. The policy follows the principles of enforcement set out in the Council's overarching Public Safety and Housing Enforcement Policy 2017 and therefore reflects the need to respect the relevant rights given by the Human Rights Act.

Decisions of Regulatory Services are open to challenge through the First Tier Property Tribunal and in certain cases the Magistrates Court and beyond. The policy is designed to ensure our compliance with legislation and statutory guidance, minimising the risk of legal challenge.

6.3. What is the impact on the organisation?

The adoption of the policy should have limited impact on the organisation. There is no human resource, financial or ICT implications as cases which are likely to be subject to civil penalties will be investigated using current resources. There is a potential positive impact, in that any income received from civil penalties provides an opportunity to undertake further proactive work and statutory functions in relation to the Council's enforcement activities covering the PRS.

6.4. Equalities / EIA

The Policy for Enforcing Standards in Private Sector Housing makes links to the Council's Equality and Diversity Policies and an Equalities Assessment exists for regulatory activities. A specific Equalities Assessment has been completed for this report and is attached at Appendix 2 to the report.

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

The review of the policy provides an opportunity for the Council to address issues relating to the climate change agenda.

6.6. Implications for partner organisations?

The policy for Enforcing Standards in Private Sector Housing contributes towards the work of the Community Safety Partnership.

The effective operation of the policy by Regulatory Services has an impact on the quality and management of properties in the PRS and on the co-existence of rented properties with local residents and communities.

Report author(s):

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Service:

Regulatory Services

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Enquiries should be directed to the above person.

Contributor/ approver name	Title	Service	Date doc sent out	Date response received or approved
Contributors:				
Davina Blackburn	Strategic Lead Regulation	Street Scene and Regulatory Services	23 rd August 2022	23 rd August 2022
Suzanne Bennett	Governance Services Co- ordinator	Law and Governance	30 th August 2022	1 st September 2022
Names of approvers for submission: (officers and members)				
Cathy Crosby	Finance Officer	Finance	23 rd August 2022	26 th August 2022
Gill Carter	Legal Officer	Law and Governance	23 rd August 2022	25 th August 2022
Andrew Walster	Director of Streetscene and Regulatory Services	Street Scene and Regulatory Services	30 th August 2022	1 st September 2022
Councillor A Khan	Cabinet Member for Policing and Equalities		5 th September 2022	15 th September 2022
Councillor D Welsh	Cabinet Member for Housing and Communities		5 th September 2022	15 th September 2022

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POLICY ON ENFORCING STANDARDS IN PRIVATE SECTOR HOUSING 2022.

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1. PURPOSE

This policy is intended to provide guidance for officers, businesses and members of the public on the principles and processes, which will apply when enforcement action is considered or taken in cases being investigated in the Private Sector in Coventry. It also provides a background to the legislation and guidance on which it is based.

It is important for local authorities to have an enforcement policy to ensure consistency of approach among Council officers and for members of the public to know what to expect from the service. An enforcement policy also provides clarity if the Council takes legal proceedings or enforcement action is appealed against.

Our aim is to raise standards in Private Sector Housing throughout Coventry, working with owners, landlords, letting agents and tenants to achieve this. However, it is recognised that if the law is broken, then enforcement action may be necessary to protect the public and the environment.

2. INTRODUCTION

The Council has a responsibility to deal with unsatisfactory housing in its area and nationally, conditions in the Private Rented Sector (PRS) tend to be less satisfactory than in owner-occupied homes.¹

It is for this reason that enforcement forms the core function of the Council and whilst the teams work hard to develop a professional and constructive relationship with responsible landlords, the need to ensure that all properties meet minimum standards is paramount.

A firm but fair policy on enforcement in accordance with our published procedures is adopted with regular service of statutory notices in cases where informal action has proved ineffective or is inappropriate.

When conducting any investigations each case is judged on its own merits and in accordance with Coventry City Council's [Enforcement Policy](#), and the [CPS evidential and public interest tests](#).

Duties fall under three main headings as follows:

- 1) Undertaking inspections/audits and providing guidance to ensure that residential accommodation meets minimum legal standards. Taking formal action as necessary to secure compliance with statutory requirements;

¹ English Housing Survey 2020-21

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1060141/2020-21_EHS_Headline_Report_revised.pdf



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- 2) The administration and enforcement of the mandatory licensing of prescribed HMOs;
- 3) The administration and enforcement of the discretionary additional licensing of prescribed HMOs;

This policy sets out the Council's principles for enforcing and exercising its duties as a Housing Authority under the following Acts and Regulations made there under:

- The Housing Act 1985
- The Housing Act 2004
- The Protection from Eviction Act 1977
- The Building Act 1984
- The Environmental Protection Act 1990
- The Public Health Act 1936
- The Local Government (Miscellaneous Provisions) Act 1976 and 1982
- The Equality Act 2010
- The De-regulation Act 2015
- The Housing and Planning Act 2016
- The Tenant Fees Act 2019
- The Electrical Safety Standards in the Private Rented Sector (England) Regulations 2020
- The Energy Efficiency (Private Rented Property ("PRS")) (England and Wales) Regulations 2015
- The Smoke and Carbon Monoxide Alarm (Amendment) Regulations 2022
- The Mobile Homes (Requirement for Manager of Site to be Fit and Proper Person) (England) Regulations

3. POLICY STATEMENT

The Council considers the protection of public health paramount and when enforcing the law all assistance will be given to landlords and agents to comply with legal requirements.

All enforcement action will be proportional to the risk any situation presents and will always be in accordance with statutory Codes of Practice, Council procedures and protocols, and official guidance from central and local government bodies.

Reasonable effort will be made to ensure compliance with the law by a process of advice and education. Formal action will however be considered in the following circumstances:

- where there is a strict liability to comply and a risk to public health exists;
- where there is a blatant or deliberate contravention of the law;



- where there is a history of non-compliance, or cooperation for an informal approach is not forthcoming; and
- where action agreed as part of an informal process is not being progressed within agreed timescales.

In safeguarding housing conditions and wider environmental issues arising from rented homes in Coventry, the Council will aim to work with responsible landlords to help them to reduce issues and raise housing standards. However, where appropriate and necessary, the Council will instigate appropriate enforcement action against landlords who fail to comply with their legal requirements.

The Council will expect landlords to have a good understanding of the housing standards and management issues that should be met in privately rented accommodation; it would expect landlords to refer to the Council's guide to minimum property standards and to liaise with Council officers or other professionals to confirm the extent to which additional requirements apply to any addresses let out as Houses in Multiple Occupation (HMOs).

4. HOARDING AND DILAPIDATED PROPERTIES

These are properties often occupied by vulnerable persons, sometimes with mental health issues or elderly people struggling to cope. There has been an increased awareness of the issue brought about by publicity and media exposure and a corresponding rise in the number of reports from neighbours and health visitors regarding issues of disrepair, lack of hygiene or accumulations within properties. While these properties are usually owner occupied, the Council has powers under legislation to take action where the situation is likely to cause harm or ill health to the occupier or where there is a wider health issue or where statutory nuisance may exist.

The cases that come to light are prioritised and referred to other agencies as necessary, particularly when there are safeguarding issues. Known cases are kept under review.

Enforcement action will be taken when necessary to protect public health, but the Council will primarily seek to provide signposting to assistance and engage with the relevant agencies to help them deal with any underlying issues.

5. ENFORCEMENT OPTIONS

Coventry City Council recognises and affirms the importance of achieving and maintaining consistency in approach to making decisions that concern regulatory enforcement action, including prosecution.



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To achieve and maintain consistency, relevant guidance and policy is always considered and followed unless inappropriate in the circumstances.

In deciding upon enforcement options, the Council will have due regard to its overarching enforcement policy - Public Safety and Housing Enforcement Policy November 2017 as well as having due regard to statutory guidance, approved codes of practice and relevant industry or good practice guides.

Generally, it is the Council's preference that landlords are first given the opportunity, wherever possible, to investigate any reported problems at their properties. The Council expects responsible owners to undertake necessary repairs and improvements without the need for the Council to instigate formal action.

There are a number of options available to the Council and it will depend on the circumstances of the case:

No Action – Where premises are found to be satisfactory.

Informal Action – Informal action will be taken in relation to minor Category 2 hazards or where the Landlord is accredited by the Council through the Coventry Landlord Accreditation Scheme (CLAS).

In most cases, in receipt of a complaint regarding housing conditions at an address, the Council would contact the tenant and establish the nature of the complaint and general details of the disrepair present. They would provide the tenant with advice on the Deregulation Act and action that the Council may be able to take in relation to the disrepair found. The Council will arrange to visit the property and assist the tenant to put their complaint in writing to the landlord to highlight the alleged deficiencies and request that the complaint be investigated, and remedial action taken as necessary.

Where the tenant has not received a satisfactory response then a visit may be made and an assessment carried out to determine which course of action is appropriate.

If, at the outset the initial complaint indicates that an immediate investigation by a Council officer is warranted or the tenant does not wish to avail themselves of the protection that the Deregulation Act provides, then a visit will be made.

Formal Action – This action will normally be the first course of action following the inspection unless the landlord has provided the tenant with a satisfactory response or is accredited.

In cases where officers visit an address, whether this is a result of a landlord's failure to adequately resolve a highlighted issue or as part of an audit or other investigation, written or verbal advice may be deemed sufficient should the inspection highlight only minor deficiencies.

With regard to assessments made under the Housing Health and Safety Rating System (HHSRS) made under Part 1 of the Housing Act 2004, the Council would not



normally take formal action if the identified defects equated only to minor or moderate Category 2 hazards.

The Council has a statutory duty to act in cases of Category 1 hazards and will exercise this duty where it is clear that the landlord has failed to provide the tenant with a satisfactory response or to address the concerns raised.

In deciding on the appropriate enforcement approach the Council will have regard to the HHSRS enforcement guidance: housing conditions

Guidance for local housing authorities about their duties and powers under part 1 of the Housing Act 2004.

<https://www.gov.uk/government/publications/housing-health-and-safety-rating-system-enforcement-guidance-housing-conditions>

The enforcement options available to the Council under the Housing Act 2004 are set out in Appendix 1 to this Policy.

These are notices used when a landlord is failing to comply with housing or other health and environmental legislation. They normally require that necessary remedial action be taken at a specified property by the owner within a specified time period, which will vary depending on the nature and scale of the works.

For defects that give rise to Category 1 HHSRS hazards under Part 1 Housing Act 2004, the Council has a duty to take appropriate enforcement action to deal with that hazard. The Council will also normally seek to deal with any significant Category 2 hazards identified at an address, whether or not Category 1 hazards are also present. Where a property contains a number of more modestly rated hazards, which appear to create a more serious situation when looked at together, the situation may be deemed unsatisfactory and in need of action. This is because the occupants encounter one hazard after another as they move around.

In situations where a landlord fails to comply with a formal notice requiring remedial works, the Council may undertake these works in default of the owner and take steps to recover any costs incurred. This power may be exercised in addition to any prosecution proceedings taken for non-compliance with this notice.

Where there is a Category 1 HHSRS hazard present that is considered to represent an imminent risk of serious harm to the health and safety of the occupiers of a dwelling, the Council may serve an Emergency Prohibition Order or take Emergency remedial action. Such emergency actions would involve either the removal of certain defects giving rise to the immediate risk or the closure of all or part of a dwelling.

Failure to comply with a statutory notice can be a criminal offence and may lead to prosecution and/ or, where appropriate, the carrying out of work in default. As the Council relies heavily upon statutory notices to ensure compliance, it will view a breach of a notice as a serious matter.



The Council will normally charge where legislation permits the recovery of costs for serving statutory notices.

Civil Penalties

Coventry City Council has powers to issue civil penalties as an alternative to prosecution in respect of the following breaches:

- Failure to comply with an Improvement Notice (section 30 of the Housing Act 2004);
- Offences in relation to licensing of Houses in Multiple Occupation (section 72 of the Housing Act 2004);
- Offences in relation to licensing of houses under Part 3 of the Act (section 95 of the Housing Act 2004);
- Offences of contravention of an overcrowding notice (section 139 of the Housing Act 2004);
- Failure to comply with management regulations in respect of Houses in Multiple Occupation (section 234 of the Housing Act 2004);
- Breach of a banning order (section 21 of the Housing and Planning Act 2016);
- Failure to comply with Regulation 3 of the Electrical Safety Standards in the Private Rented Sector (England) Regulations 2020;
- Failure to comply with the requirement of the Tenant Fees Act 2019; and
- Failure to comply with the requirements of the Energy Efficiency (Private Rented Property) (England and Wales) Regulations (as amended) and the Energy Performance of Buildings (England and Wales) Regulations 2012

If a civil penalty is paid in respect of a breach Coventry City Council will not take any further enforcement action in respect of that breach. If a penalty is not paid, Coventry City Council may commence proceedings or take other enforcement action in respect of the breach.

Where there is a legislative option for the Council to choose the amount payable for a civil penalty, the Council's policy will be to charge the maximum permitted level. The charges will be available on the Council's website.

Where appropriate the Council will apply for a Rent Repayment Order (RRO) and support tenants who wish to apply for a RRO.

The Council's approach to determine appropriate penalty levels is set out in Appendix 2 for penalties issued in relation to Housing Act, and Housing and Planning Act and Appendix 3 for penalties issued in relation to Tenant Fees Act offences, Appendix 4 for penalties issued in relation to the Electrical Safety Standards and Appendix 5 in relation to the Minimum Energy Efficiency Standards and the requirements regarding Energy Performance Certificates.



Appendix 6 provides the policy on Caravan Licensing Fit and proper person assessments

Appendix 7 provides the decision-making process for the length of time someone is maintained on the Rogue Landlord Database.

Simple Caution

Coventry City Council has the power to issue simple cautions (previously known as 'formal cautions') as an alternative to prosecution for some less serious offences, where a person admits an offence and consents to the simple caution. Where a simple caution is offered and declined, Coventry City Council is likely to consider prosecution.

A simple caution will influence how Coventry City Council and others deal with any similar breaches in the future, and may be cited in court if the offender is subsequently prosecuted for a similar offence.

Simple cautions will be used in accordance with Ministry of Justice Guidance and any other relevant guidance.

Prosecution

When deciding whether to prosecute Coventry City Council has regard to the provisions of The Code for Crown Prosecutors as issued by the Director of Public Prosecutions.

Prosecution will only be considered where Coventry City Council is satisfied that it has sufficient evidence to provide a realistic prospect of conviction against the defendant(s).

Before deciding that prosecution is appropriate, Coventry City Council will have particular regard to the following public interest criteria:

- How serious is the offence committed;
- What is the level of culpability of the suspect;
- What are the circumstances of and the harm caused to the victim;
- Was the suspect under the age of 18 at the time of the offence;
- What is the impact on the community;
- Is prosecution a proportionate response; and
- Do sources of information require protecting.

The Council expects that, in the public interest, enforcing authorities should normally prosecute, or recommend prosecution, where, following an investigation or other regulatory contact, one or more of the following circumstances apply. Where:

- a breach of the legislation resulted in a death;



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- the gravity of an alleged offence, taken together with the seriousness of any actual or potential harm, or the general record and approach of the offender warrants it;
- there has been reckless disregard of legislative requirements;
- there have been repeated breaches which give rise to significant risk, or persistent and significant poor compliance;
- the breach has been carried out without or in serious non-compliance with an appropriate licence or permission;
- a duty holder's standard of compliance is found to be far below what is required by law and to be giving rise to significant risk;
- there has been a failure to comply with a statutory notice; or there has been a repetition of a breach that was subject to a simple caution;
- false information has been supplied wilfully, or there has been an intent to deceive, in relation to a matter which gives rise to significant risk; and/or
- officers have been intentionally obstructed in the lawful course of their duties.

In deciding on the public interest, the Council will make an overall assessment based on the circumstances of each case and will consider all relevant circumstances carefully, including local and corporate priorities.

6. DECISION MAKING

Ultimately, it is for Coventry City Council to decide which option it wishes to pursue but as a general principle, local authorities should normally prosecute where an offence is particularly serious or where the offender has committed similar offences in the past.

Prosecution in serious cases demonstrates that the Local Authority will not hesitate to take formal action where needed and is likely to act as a strong deterrent both to the offender and other rogue landlords. A prosecution also enables the Local Authority to apply for a banning order following a successful conviction.

Coventry City Council has an enforcement matrix which is used to determine the most appropriate course of action in enforcement cases. The principle of the enforcement matrix is to provide a score based on a number of factors, both negative and positive. Bands are provided to reflect the score produced and the appropriate courses of action for dealing with the identified situation.

Band 1 reflects cases that score positively or up to minus 10 and recommends an informal approach to enforcement.

Band 2 reflects cases that score between minus 11 and minus 30 and recommend action on a non punitive level such as revocation of licences or reduction in licence lengths.



Band 3 starts to cover more serious offences with scores between minus 31 and minus 40 and the recommended course of action is to be determined by way formal investigation with outcomes such as a caution or financial penalty being the likely approach.

Band 4 is where the score is greater than minus 41 and for the most serious cases. An investigation is recommended, and outcomes could include prosecution, banning orders, or significant financial penalties.

The enforcement matrix provides guidance to officers carrying out investigations and ensures that enforcement is being carried out in a fair, proportionate and consistent way.

Database of Rogue Landlords

The database is designed to be a tool which will help local housing authorities to keep track of rogue landlords and focus their enforcement action on individuals and organisations who knowingly flout their legal obligations. The more comprehensive the information on the database, the more useful it will be to authorities. Such information will also encourage joint working between local housing authorities who will be able to establish whether rogue landlords operate across their local housing authority areas.

The duties and powers available to local housing authorities with regard to the database of rogue landlords and property agents (“the database”) are set out under the provisions in Chapter 3 of Part 2 of the Housing and Planning Act 2016 (“the Act”). The information that must be included in an entry on the database is described in the Housing and Planning Act 2016 (Database of Rogue Landlords and Property Agents) Regulations 2018

Local housing authorities must have regard to the criteria in the statutory guidance in deciding whether to make an entry in the database under section 301 of the Act, and the period to specify in a decision notice under section 312 of the Act.

The Council will add an entry onto the rogue landlord database in respect of a person who receives a banning order. This is a statutory requirement.

The Council will have regard to the guidance set out above when deciding whether or not to exercise its discretionary power to make an entry onto the rogue landlord database in respect of a person who receives two or more financial penalties in the same year, or is convicted of a banning order offence.

The statutory guidance sets out the criteria to which local housing authorities must have regard in deciding whether to make an entry under section 30 of the Act.

Charging for Enforcement

If there is a statutory charging mechanism the Council will seek to recover the full costs of providing its services wherever that is possible in accordance with guidance provided by Government and its policies.

Charges are made for the serving of formal notices under the Housing Act 2004. If properties are rented in a condition that requires statutory intervention the City Council will endeavour to recover the costs incurred. Similarly the Council will adopt the highest penalties in the case of Civil Penalties in accordance with the guidance provided by Government and its policies.

Proceeds of Crime

Where appropriate the Council will consider the use of the Proceeds of Crime Act 2002. The Proceeds of Crime Act allows local authorities to recover assets that have been accrued through criminal activity.

7. MONITORING AND REVIEW

The Service will keep its regulatory activities and interventions under review, with a view to considering the extent to which it would be appropriate to remove or reduce the regulatory burdens they impose, where the Council has direct control of these matters.

Changes will be introduced into this document where necessary to accommodate new legislation, guidance and local needs.

The satisfaction of service users i.e. landlords, tenants and residents will be assessed through regular random sample customer questionnaires.

Application of the Policy

All officers must have regard to this policy and make decisions in accordance with the Council procedures when making enforcement decisions.

Maximum Levels

Coventry City Council takes the enforcement of housing conditions in the Private Rented Sector extremely seriously and proactively pursues enforcement action where it is considered to be necessary and appropriate.

There may be circumstances when the Council is dealing with offences that it considers will warrant a maximum penalty. This will be carried out in accordance with guidance provided by Government and the Council's policy.

Recording of the decision

A record of each decision and the reasons for the financial penalty will be made together with how the amount of the penalty was set and the reasons for imposing it.

Policy on Private Sector Housing Enforcement

Appendix 1 – Acts and Regulations

The Housing Act 2004

The Housing Act 2004 (the Act) provides that, amongst other things, the statutory minimum standard for all homes in England and Wales, the Housing Health and Safety Rating System (HHSRS).

HHSRS is a calculation of the effect of 29 possible hazards on the health of occupiers and the legislation provides a range of actions for addressing identified hazards. This Policy takes account of guidance¹ provided by the Government and sets out how the Council will use its powers and reach its decisions in relation to the HHSRS (Part 1 of the Housing Act 2004).

The Council has a **duty** to take action to address Category 1 hazards as defined by the Act and must decide which of the available enforcement options is the most appropriate to use.

In the case of Category 2 hazards identified under HHSRS the Council has a **power** to take action and will exercise its discretion and consider individual cases and circumstances when deciding whether to take action in response to Category 2 hazards.

Housing Act 2004 Notices and Orders

Improvement Notices require the recipient to carry out certain works within a specified time period. It is anticipated that Improvement Notices will be an appropriate and practical remedy for most hazards.

Where the Council determines that an Improvement Notice should be served in respect of a Category 1 Hazard, it will:

- Require works that will either remove the hazard entirely or reduce its effect so that it ceases to be a Category 1 hazard.

Where the Council determines that an Improvement Notice should be served in respect of a Category 2 Hazard, it will:

- Require works it considers sufficient either to remove the hazard or reduce it to an appropriate degree.

Suspended Improvement Notices provide the Council with a power to suspend an Improvement Notice once served.

¹ Housing health and safety rating system (HHSRS) enforcement guidance: housing conditions - <https://www.gov.uk/government/publications/housing-health-and-safety-rating-system-enforcement-guidance-housing-conditions>

The Council will consider this course of action where it is reasonable in the circumstances, to do so, for example,

- The need to obtain planning permission (or other appropriate consent) that is required before repairs and/or improvements can be undertaken; and
- Personal circumstances of occupants, which suggests that works ought to be deferred.

When deciding whether it is appropriate to suspend an Improvement Notice, the Council will have regard to:

- The level of risk presented by the hazard(s);
- The response or otherwise of the landlord or owner; and
- Any other relevant circumstances (e.g. whether the vulnerable age group is present).

Suspended Improvement Notices will be reviewed on an ongoing basis, at least every 6 months.

Prohibition Orders can be used in respect of both Category 1 and Category 2 hazards for all or part of a dwelling and are likely to be used if repair and/or improvement appear inappropriate on grounds of practicality or excessive cost (i.e. the cost is unrealistic in terms of the benefit to be derived).

Prohibition Orders can prohibit specific uses (Section 22 (4)(b) Housing Act 2004); this option may be employed to prevent occupation by particular descriptions of persons, for example premises with steep staircases or uneven floors which make them particularly hazardous to elderly occupants and premises with open staircase risers or widely spaced balustrades that make them particularly unsuitable for infants.

Suspended Prohibition Orders provide the Council with the power to suspend a Prohibition Order once served.

The Council will consider this course of action where it is reasonable in the circumstances to do so. Suspended Prohibition Orders will be reviewed on an ongoing basis, at least every 6 months. The Council will consider any written requests made for alternative uses of premises in accordance with our planning duties.

Hazard Awareness Notices may be served to notify owner-occupiers of the existence of hazards (for example where the risk from the hazard is mitigated by the longstanding nature of the occupancy). It might also be applicable where:

- It is judged appropriate to draw a landlord's attention to the desirability of remedial action; and
- To notify a landlord about a hazard as part of a measured enforcement response.

Emergency Remedial Action & Prohibition Orders may be used specifically where the Council is satisfied that:

- A Category 1 hazard exists, and that
- the hazard poses an imminent risk of serious harm to health or safety, and that

- immediate action is necessary.

If these conditions are met, the Council will take appropriate emergency action. Situations in which emergency action may be appropriate include:

- Residential accommodation located above commercial premises which lack a safe means of escape in the event of fire because there is no independent access; and
- Risk of electrocution, fire, gassing, explosion or collapse.

Demolition Orders provides the Council with the power to make an Order to demolish the building as a possible response to a Category 1 hazard (where they are judged the appropriate course of action). In determining whether to issue a Demolition Order, the Council will take account of Government guidance that is applicable at the time and will consider all the circumstances of the case.

Clearance Areas can be declared if the Council is satisfied that each of the premises in the area is affected by one or more Category 1 hazards (or that they are dangerous or harmful to the health and safety of inhabitants as a result of a bad arrangement or narrowness of streets). In determining whether to declare a Clearance Area, the Council will act only in accordance with Section 289 of the Housing Act 1985 (as amended) and having had regard to relevant Government guidance on Clearance Areas and all the circumstances of the case.

Houses in Multiple Occupation (HMOs)

Part 2 of the Housing Act 2004 introduced a mandatory licensing system for certain types of Houses in Multiple Occupation (HMO).

The aim of licensing is to ensure that every licensable HMO is safe for the occupants and visitors and is properly managed.

Since 2006 all HMOs of three or more storeys with 5 or more occupants, sharing facilities required a licence.

The Government has introduced changes to the mandatory licensing system set out in the Housing Act 2004 that will remove the “three storey rule” and as such from October 2018 owners of HMOs with 5 or more occupants must apply to the Council to have their properties licensed.

The responsibility for applying for a licence rests with the person having control of or the person managing the property.

The Housing Act 2004 also provides the Council with the power to apply Discretionary Licensing, either by way of Additional or Selective Licensing based on specific conditions being met. Should an area within Coventry ever become subject to Selective licensing, a specific enforcement policy will be developed to accompany any designation.

HMO Licensing Offences

The Housing Act 2004 sets out a number of licensing related offences all of which carry an unlimited fine, including:

- Operating an unlicensed HMO;
- Allowing an HMO to be occupied by more persons than a licence allows;
- Breach of licence condition; and
- Supplying incorrect information in a licence application.

Rent Repayment Orders (RRO)

In addition to the above, a landlord who operates an unlicensed HMO can be subject to a Rent Repayment Order (RRO) by a First-tier Tribunal (Property Chamber) under sections 96 and 97 of the Housing Act 2004.

A RRO requires repayment of rent received by the landlord over a period of up to 12 months. The Council will usually consider applying for such a measure if the landlord has received rent that has been paid by Housing Benefit.

Where an unlicensed HMO is identified, the Council will assess whether there are good reasons why an application has not been received. If there are no good reasons, the Council will look to take formal proceedings with a view to prosecution in the courts or by way of issuing a Civil Penalty.

Any action in relation to a breach of licence conditions will be assessed on how serious the breach affects the safety of the occupants or whether the responsible person does not carry out necessary works within an agreed timescale or has been given a previous opportunity to comply. Where appropriate the Council will pursue legal proceedings if it is in the public interest to do so.

Interim and Final Management Orders

An Interim Management Order (IMO) transfers the management of a residential property to the Council for a period of up to twelve months. The circumstances in which an order can be made are discussed below. In particular, the IMO allows the Council possession of the property against the immediate landlord, and subject to existing rights to occupy can:

- do anything in relation to the property, which could have been done by the landlord, including repairs, collecting rents etc.
- spend monies received through rents and other charges for carrying out its responsibility of management, including the administration of the property; and
- to create new tenancies (with the consent of the landlord).

Under an IMO the Council must pay to the relevant landlord (that is the person(s) who immediately before the order was made was entitled to the rent for the property) any surplus of income over expenditure (and any interest on such sum) accrued during the period in which the IMO is in force. It must also keep full accounts of income and expenditure in respect of the house and make such accounts available to the relevant person.

The Council **must** take enforcement action in respect of a licensable property (which means an HMO subject to Part 2, or other residential property subject to Part 3) by making an IMO if:

- the property ought to be licensed, but is not, and the Council considers there is no reasonable prospect of it granting a licence in the near future; and/or
- the Health and Safety Condition isn't met and, therefore, it would not have granted an application for a licence.

An IMO may not, however, be made on these grounds if an effective application is outstanding with the authority for the grant of a licence or a Temporary Exemption Notice or if such a notice is in force.

Final Management Orders

In exceptional circumstances the Council can also apply to the First Tier Tribunal (Residential Property) for a Final Management Order (FMO) which can last for up to five years. Such powers will only be used in exceptional circumstances and will be authorised through the appropriate method.

Management Order Management Schemes

The Council must adopt a management scheme for a property subject to an FMO. The scheme must set out how the Council intends to manage the house.

In particular, the management scheme must include:

- the amount of rent it will seek to obtain whilst the order is in force;
- details of any works which the Council intends to undertake in relation to the property;
- the estimate of the costs of carrying out those works;
- provision as to the payment of any surpluses of income over expenditure to the relevant landlord, from time to time; and
- in general terms how the authority intends to address the matters that caused the Council to make the order.

The Council must also keep full accounts of income and expenditure in respect of the house and make such accounts available to the relevant landlord.

Temporary Exemption Notices

Where a landlord is, or shortly will be taking steps to make an HMO non-licensable, the Council may serve a Temporary Exemption Notice (TEN). A TEN can only be granted for a maximum period of three months. In exceptional circumstances a second TEN can be served for a further three-month period. A TEN will be considered where the owner of the HMO states in writing that steps are being taken to make the HMO non- licensable within 3 months.

Raising Standards in HMOs

Under current legislation many HMOs do not currently require a licence. These include houses containing self-contained flats and smaller HMOs. Many of these still pose a significant degree of risk to occupants and/or have a history of being poorly managed. With that in mind the Council introduced a citywide Additional Licensing scheme in

May 2020 which will run for a period of five years to support the regulation of such HMOs. Enforcement of the HMO Management Regulations and the use of the HHSRS will support the licensing regime.

General Management of HMOs

The Management of Houses in Multiple Occupation (England) Regulations 2006 require the person having control of the house to ensure that:

- all services, furnishings, fixtures and fittings are maintained in good, sound, and clean condition;
- the structure is kept in good order;
- all communal areas of the interior are regularly cleaned and redecorated as necessary;
- all yards, boundary walls, fences, gardens and outbuildings are maintained in a safe and tidy condition;
- satisfactory arrangements for the disposal of refuse and litter have been made;
- at the commencement of all tenancies the lettings are clean, in a satisfactory state of repair and decoration, and comply in all respects with these standards;
- all staircases and multiple steps should be provided with suitable handrails; and
- all tenants should fulfil their tenancy obligations.

Where compliance with the Management Regulations has not been achieved then enforcement will be considered based on the affect the breaches are likely to have on the occupants thereby providing tenants and neighbours confidence that the Council are addressing any issues relating to all HMOs.

Fire Safety in HMOs

Statistically, HMOs have one of the highest incidents of deaths caused by fire in any type of housing. It is therefore essential that any HMO possesses an adequate means of escape in event of a fire and adequate fire precautions. The actual level of fire protection and detection required will be determined by a risk assessment. The Planning and Regulatory Service is generally the lead enforcing authority for fire safety in HMOs, however where an HMO contains communal areas, a Fire Risk Assessment must be carried out in accordance with the Regulatory Reform Order which is administered by West Midlands Fire & Rescue Service.

Powers of Entry and Power to Require Information

The Council has the power of entry to properties at any reasonable time to carry out its duties under Section 239 of the Housing Act 2004 provided that:

- The officer has written authority from an appropriate officer (Strategic Lead of Regulation) stating the particular purpose for which entry is authorised; and
- The officer has given 24 hours' Notice to the owner (if known) and the occupier (if any) of the premises they intend to enter.

No such notice is required where entry is to ascertain whether an offence has been committed under Sections 72 (offences in relation to licensing of HMOs), 95 (offences in relation to licensing of houses) or 234(3) (offences in relation to HMO Management Regulations).

If admission is refused, premises are unoccupied or prior warning of entry is likely to defeat the purpose of the entry, then a warrant may be granted by a Justice of the Peace on written application. A warrant under this section includes power to enter by force, if necessary.

The Council also has power under Section 235 of the Housing Act 2004 to require documentation to be produced in connection with:

- any purpose connected with the exercise of its functions under Parts 1-4 of the Housing Act 2004; and
- investigating whether any offence has been committed under Parts 1-4 of the Housing Act 2004.

The Council also has powers under Section 237 of the Housing Act 2004 to use the information obtained above and Housing Benefit and Council Tax information obtained by the authority to carry out its functions in relation to these parts of the Act.

Housing And Planning Act 2016

This Act provides Coventry City Council with additional powers and amends existing powers within the Housing Act 2004. Planning and Regulatory Services will implement these where appropriate in accordance with statutory guidance provided by Government and its policies and procedures.

Civil Penalties

In April 2017 powers to impose Civil Penalties of up to £30,000 as an alternative to prosecution for certain specified offences came in to force under Section 126 and Schedule 9 of the Housing and Planning Act 2016.²

Income received from a civil penalty can be retained by the local housing authority provided that it is used to further the local housing authority's statutory functions in relation to their enforcement activities covering the PRS.

A civil penalty may be imposed as an alternative to prosecution for the following offences under the Housing Act 2004:

- failure to comply with an Improvement Notice (section 30);
- offences in relation to licensing of Houses in Multiple Occupation (section 72);
- offences in relation to licensing of houses under Part 3 of the Act (section 95);
- offences of contravention of an Overcrowding Notice (section 139); and
- failure to comply with Management Regulations in respect of Houses in Multiple Occupation (section 234).

The amount of penalty is to be determined by the Council in each case by applying the matrix in this policy. In determining an appropriate level of penalty, the Planning

² Civil Penalties - <https://www.gov.uk/government/publications/civil-penalties-under-the-housing-and-planning-act-2016>

and Regulatory Service will have regard to statutory guidance given in the Ministry of Housing Communities and Local Government publication 'Civil Penalties under the Housing and Planning Act 2016'.

Only one penalty can be imposed in respect of the same offence and a civil penalty can only be imposed as an alternative to prosecution. However, a civil penalty can be issued as an alternative to prosecution for each separate breach of the Houses in Multiple Occupation Management Regulations. Section 234(3) of the Housing Act 2004 provides that a person commits an offence if he fails to comply with a regulation. Therefore, each failure to comply with the regulations constitutes a separate offence for which a civil penalty can be imposed.

The same criminal standard of proof is required for a civil penalty as for prosecution. This means that before taking formal action, the Council must satisfy itself that if the case were to be prosecuted in a magistrates' court, there would be a realistic prospect of conviction. In order to achieve a conviction in the magistrates' court, the Planning and Regulatory Service must be able to demonstrate beyond reasonable doubt that the offence has been committed. Further details of how the Council determines penalty levels can be found at Appendix 1.

Rent Repayment Orders

In addition to the powers provided by the Housing Act 2004³ to apply RROs in regard to offences related to HMOs as outlined above, the Housing and Planning Act 2016 extended the power to apply RROs in respect of the following offences committed after 6th April 2017:

- failure to comply with an Improvement Notice under Section 30 of the Housing Act 2004;
- failure to comply with a Prohibition Order under Section 32 of the housing Act 2004;
- breach of a banning order made under Section 21 of the Housing and Planning Act 2016;
- using violence to secure entry to a property under Section 6 of the Criminal Law Act 1977; and
- illegal eviction or harassment of the occupiers of a property under Section 1 of the Protection from Eviction Act 1977.

The maximum amount of rent that can be recovered is capped at 12 months. A criminal standard of proof is required. The Council must apply to the First Tier Property Tribunal for an RRO.

Database of Rogue Landlords

The Rogue Landlord Database is a new tool for local authorities in England to keep track of rogue landlords and property agents and came into force on 6 April 2018.

³ Rent Repayment Orders - <https://www.gov.uk/government/publications/rent-repayment-orders-under-the-housing-and-planning-act-2016>

A local housing authority must make an entry on the database where a landlord or property agent has received a banning order. They have the discretion to make entries where a landlord or property agent has been convicted of a banning order offence or has received 2 or more civil penalties within a 12 month period.

Local authority officers will be able to view all entries on the database, including those made by other local housing authorities. The database can be searched to help keep track of known rogues, especially those operating across council boundaries and will help authorities target their enforcement activities.

Details held on the database will not be available to members of the public.

Regulatory Services will have regard to the guidance⁴ provided by Government when deciding whether or not to include a person on the Rogue Landlord Database.

Appendix 7 provides the Council's decision-making process when determining the length of time a person will remain on the Rogue Landlord Database.

Banning Orders

From the 6th April 2018 a Local Authority has the power to apply to the First Tier Tribunal for a banning order.

A Banning Order is an order that bans a landlord or property agent from:

- Letting housing in England;
- Engaging in English letting agency work;
- Engaging in English property management work; and
- Doing two or more of those things. Breach of a banning order is a criminal offence.

A Banning Order must be for a minimum period of 12 months. There is no statutory maximum period for a Banning Order.

Planning and Regulatory Services will use banning for the most serious offenders who breach their legal obligations and rent out accommodation which is substandard and where previous sanctions, such as a prosecution has not resulted in positive improvements, and it is necessary for the Council to proceed with further prosecutions/formal action.

Part 5 of the Housing and Planning Act 2016 covers a range of measures including changes to the 'fit and proper person' test applied to landlords who let out licensable properties and allowing arrangements to be put in place to give authorities in England access to information held by approved Tenancy Deposit Schemes with a view to assisting with their private sector enforcement work.

⁴Rogue Landlord Database - <https://www.gov.uk/government/publications/database-of-rogue-landlords-and-property-agents-under-the-housing-and-planning-act-2016>

Protection From Eviction Act 1977

The Legislation defines unlawful eviction and harassment of residential occupiers, creates a criminal offence for breach of same for which any person subsequently convicted of an offence may receive an unlimited fine and/or a term of imprisonment.

Residential Occupiers [tenants] occupying a privately rented property under the provisions of an Assured Shorthold Tenancy are entitled exclusive possession of the property, to enjoy the property without interference to either their peace or comfort and not to be unlawfully evicted from it.

Any person with the intent to cause the residential occupier of any premises and any person who knows, or has reasonable cause to believe the conduct committed is likely to cause the residential occupier or members of his family:

- (a) To give up the occupation of the premises or any part thereof; or
- (b) To refrain from exercising any right or pursuing any remedy in respect of the premises or part thereof; or
- (c) Does acts calculated to interfere with the peace or comfort of the residential occupier or members of his household; or persistently withdraws or withholds services reasonably required for the occupation of the premises as a residence, shall be guilty of an offence.

The Electrical Safety Standards in the Private Rented Sector (England) Regulations 2020.

The Electrical Safety Standards Regulations came into force on 1 June 2020 and form part of the Government's work to improve safety in all residential premises - and particularly in the Private Rented Sector (PRS).

These Regulations put best practice on a statutory footing. All landlords in the PRS now must do what good landlords already do: make sure the electrical installations in their rented properties are safe.

The Regulations require landlords to have the electrical installations in their properties inspected and tested by a person who is qualified and competent, at least every 5 years. Landlords must provide a copy of the electrical safety report to their tenants, and if requested to their local authority.

Local authorities have a vital role to play in ensuring a high-quality, safe and healthy PRS. Under these Regulations they can require landlords to carry out vital remedial works or even arrange for the repairs to be done and recover their cost from the landlord. They can decide the level of penalty for landlords who don't comply, up to £30,000 and can spend the proceeds on enforcement purposes, helping them to keep up the good work driving up standards in privately rented homes.

Environmental Protection Act 1990

Statutory Nuisance Provisions

If a property is unsafe, causing or is likely to cause a nuisance to the locality, there are several legislative tools available to the Council to ensure that the condition of the property is improved.

Issues that may be a statutory nuisance include:

- noise from premises or from vehicles, equipment or machinery in the street
- smoke from premises;
- smells from industry, trade or business premises (for example, sewage treatment works, factories or restaurants);
- artificial light from premises;
- insect infestations from industrial, trade or business premises; and
- accumulation or deposits on premises (for example, piles of rotting rubbish)

For the issue to count as a statutory nuisance it must do one of the following:

- unreasonably and substantially interfere with the use or enjoyment of a home or other premises; and
- injure health or be likely to injure health.

Abatement notices

Coventry City Council must serve an abatement notice on people responsible for statutory nuisances, or on a premises owner or occupier if this is not possible. This may require whoever's responsible to stop the activity or limit it to certain times to avoid causing a nuisance and can include specific actions to reduce the problem.

The Deregulation Act 2015

Introduced on the 1st October 2015, the effect of Section 33 of the Act is to provide six months' protection from eviction for a tenant occupying a dwelling under an assured short hold tenancy, where a relevant notice has been served by a local housing authority in relation to a dwelling. The purpose is to prevent retaliatory evictions in instances where a tenant has reported conditions of disrepair to the Local Authority. The Act initially covers new tenancies only, although from 1st October 2018 it will apply to all tenancies.

The Smoke And Carbon Monoxide Alarm (Amendment) Regulations 2022

With effect from the 1st October 2015, these Regulations have for the first time made it an offence for landlords not to provide smoke and carbon monoxide alarms within their properties in prescribed locations. The requirement is to have at least one smoke

alarm installed on every storey of a rented property and a carbon monoxide alarm in any room containing a solid fuel burning appliance (e.g. a coal fire, wood burning stove). After that, the landlord must make sure the alarms are in working order at the start of each new tenancy.

On the 11th of May 2022 the Smoke and Carbon Monoxide Alarm (Amendment) Regulations 2022 were laid before Parliament and later approved, introducing amendments to the Regulations that will come into force on the 1st of October 2022.

The amendment regulations will mean:

- social landlords will be required to provide a smoke alarm on every storey of their properties where there is a room used wholly or partly as living accommodation; and
- both social and private landlords will be required to provide carbon monoxide alarms in any room of their properties used wholly or partly as living accommodation where a fixed combustion appliance is present (excluding gas cookers); and
- there will be a new obligation on all landlords to repair or replace any alarm which is found to be faulty during the period of a tenancy, and landlords will be required to repair or replace alarms as soon as reasonably practicable.

The penalty for non-compliance is to issue a remedial notice requiring a landlord to fit and/or test the alarms within 28 days. If the landlord fails to comply with the notice, the Council can arrange for the alarms to be fitted and/or tested with the occupiers consent. Failure to comply can also incur a civil penalty charge on the landlord of up to £5,000.

It is anticipated that powers under Part 1 of the Housing Act 2004 will continue to take precedence to ensure adequate fire safety on the basis that remedial works can be carried out with more expediency.

The Immigration Act 2014

Right to Rent was introduced under Part 3 of the Immigration Act 2014 as part of the government's reforms to build a fairer and more effective immigration system. The first phase was trialled in parts of the West Midlands and was applied nationally from February 1st 2016. UK Visas and Immigration are the enforcing authority. Under the new regulations, landlords will be required to check a potential tenant's 'Right to Rent' and those who fail to do so may face a penalty of up to £3,000 per tenant. The regulation will mean that private landlords, including those who sub-let or take in lodgers must check the right of prospective tenants to be in the country. The government has portrayed the issue of 'beds in sheds' as being about illegal immigration and tackling it has become part of wider government measure to clamp down on undocumented migrants as has the Housing and Planning Act.

The Tenant Fees Act 2019

The Tenant Fees Act 2019 (Act) came into force on 1 June 2019.

The key provisions of the Act restrict the kinds of payments that landlords and letting agents can require and prohibit certain arrangements in connection with the letting of housing in England.

In addition, the Act sets out stringent regulations for the treatment of holding deposits (i.e. deposits paid to reserve a property prior to the signing of a tenancy agreement). The Act applies to tenancies of housing in England. For the purposes of the Act, "tenancy" means:

- assured shorthold tenancies (other than ones of social housing and certain long leases);
- student lettings falling within paragraph 8 of Schedule 1 of the Housing Act 1988; and
- licences to occupy (excluding holiday lets and licences to occupy social housing).

The inclusion of licences in the definition of "tenancy" is a clear anti-avoidance provision designed to stop those involved in the letting of housing exploiting the lease/licence distinction to avoid complying with the new provisions.

The Caravan and Control Of Development Act 1960

The Caravan and Control of Development Act 1960 prohibits the use of land as a caravan site unless the occupier holds a site licence issued by the local authority.

Before a licence can be granted, a caravan site must first be granted Planning Consent. Once a Planning Consent has been granted, a Caravan Site Licence must be applied for and will be issued.

A caravan site licence contains provisions relating to the maintenance and running of the park. The primary purposes of the licence being to ensure that the risk of spread of fire is minimised, that there is appropriate access to the site for emergency services and that the facilities provided are appropriate to the nature and size of the site.

To ensure that this is done the licence is issued subject to the conditions based on the adopted model standards for caravan sites and a copy of the licence is displayed on site. The Council will carry out site inspections to ensure that the conditions are being complied with.

In addition to the site licence, The Mobile Homes (Requirement for Manager of Site to be Fit and Proper Person) (England) Regulations 2020 ("the Regulations") introduces a fit and proper person test for mobile home site owners or the person appointed to manage the site.

The Energy Efficiency (Private Rented Property) (England and Wales) Regulations 2015

These regulations introduced a Minimum Energy Efficiency Standard (MEES) of Energy Performance Certificate (EPC) E for the PRS. From 1 April 2018, private rented properties in scope of the MEES Regulations had to meet the minimum EPC E before they can be let on a new tenancy, unless a valid exemption has been registered. The MEES Regulations applied to all domestic properties in scope from 1 April 2020. Failure to comply with the Regulations is an offence which can result in the issuing of a financial penalty.

The Redress Schemes for Lettings Agency Work And Property Management Work (Requirement To Belong To A Scheme Etc) (England) Order 2014

The Redress Schemes for Lettings Agency Work and Property Management Work (Requirement to Belong to a Scheme etc) (England) Order 2014 made it a legal requirement for all lettings agents and property managers in England to join a government-approved redress scheme by 1 October 2014.

Tenants, prospective tenants, landlords dealing with lettings agents in the PRS; as well as leaseholders and freeholders dealing with property managers in the residential sector can complain to an independent person about the service received

The enforcement authority can impose a fine of up to £5,000 where it is satisfied, on the balance of probability that someone is engaged in letting or management work and is required to be a member of a redress scheme but has not joined.

The expectation is that a £5,000 fine should be considered the norm and that a lower fine should only be charged if the enforcement authority is satisfied that there are extenuating 54 circumstances. It will be up to the enforcement authority to decide what such circumstances might be, taking into account any representations the lettings agent or property manager makes during the 28 day period following the authority's notice of intention to issue a fine.

Policy on Private Sector Housing Enforcement

Appendix 2 – Imposing Civil Penalties Under the Housing and Planning Act 2016

1. INTRODUCTION

The power to impose a Civil Penalty as an alternative to prosecution for the following offences was introduced by section 126 and Schedule 9 of the Housing and Planning Act 2016:

- Failure to comply with an Improvement Notice (section 30 of the Housing Act 2004);
- Offences in relation to licensing of Houses in Multiple Occupation (section 72 of the Housing Act 2004);
- Offences in relation to licensing of houses under Part 3 of the Act (section 95 of the Housing Act 2004);
- Offences of contravention of an overcrowding notice (section 139 of the Housing Act 2004);
- Failure to comply with management regulations in respect of Houses in Multiple Occupation (section 234 of the Housing Act 2004); and
- Breach of a banning order (section 21 of the Housing and Planning Act 2016).

In determining the Civil Penalty amount, Coventry City Council will have regard to the statutory guidance issued under schedule 9 of the Housing and Planning Act 2016 and also to the developed civil penalty matrix.

The approach to issuing a Civil Penalty is fundamentally made up of two stages, firstly determining the appropriate sanction and secondly (if appropriate) the level of Civil Penalty charged.

When determining the appropriate sanction the Council should satisfy itself that if the case were to be prosecuted there would be a 'realistic prospect of a conviction'. This is currently determined by consulting the Crown Prosecution Service "Code for Crown Prosecutors" which provides two tests: (i) the evidential test and (ii) the public interest test.

Coventry City Council currently consults this code when determining whether to seek a prosecution for offences committed and will continue to do so on a case by case basis in line with this procedure and its enforcement policy.

The maximum penalty that can be set is £30,000. A minimum penalty level has not been set and the appropriate amount of penalty is to be determined by the local housing authority. Only one penalty can be imposed in respect of the same offence.

Statutory guidance has been issued by the Secretary of State under Schedule 9 (12) of the Housing and Planning Act 2016 and local authorities must have regard to this when exercising its functions in respect of civil penalties.

Paragraph 3.5 of the statutory guidance states that “**the actual amount levied in any particular case should reflect the severity of the offence, as well as taking account of the landlord’s previous record of offending**”. The same paragraph sets out several factors that should be taken into account to ensure that the civil penalty is set at an appropriate level.

a) **Severity of the offence.**

The more serious the offence, the higher the penalty should be.

b) **Culpability and track record of the offender.**

A higher penalty will be appropriate where the offender has a history of failing to comply with their obligations and/or their actions were deliberate and/or they knew, or ought to have known, that they were in breach of their legal responsibilities. Landlords are running a business and should be expected to be aware of their legal obligations.

c) **The harm (or potential harm) caused to the tenant.**

This is a very important factor when determining the level of penalty. The greater the harm or the potential for harm (this may be as perceived by the tenant), the higher the amount should be when imposing a civil penalty.

d) **Punishment of the offender.**

A civil penalty should not be regarded as an easy or lesser option compared to prosecution. While the penalty should be proportionate and reflect both the severity of the offence and whether there is a pattern of previous offending, it is important that it is set at a high enough level to help ensure that it has a real economic impact on the offender and demonstrate the consequences of not complying with their responsibilities.

e) **Deter the offender from repeating the offence.**

The ultimate goal is to prevent any further offending and help ensure that the landlord fully complies with all of their legal responsibilities in future. The level of the penalty should therefore be set at a high enough level such that it is likely to deter the offender from repeating the offence.

f) **Deter others from committing similar offences.**

While the fact that someone has received a civil penalty will not be in the public domain, it is possible that other landlords in the local area will become aware through informal channels when someone has received a civil penalty. An important part of deterrence is the realisation that (a) the local authority is proactive in levying civil penalties where the need to do so exists and (b) that the level of civil penalty will be set at a high enough level to both punish the offender and deter repeat offending.

g) Remove any financial benefit the offender may have obtained as a result of committing the offence.

The guiding principle here should be to ensure that the offender does not benefit as a result of committing an offence, i.e. it should not be cheaper to offend than to ensure a property is well maintained and properly managed.

The Council will consider the above factors when deciding where, within the relevant band of the Civil Penalties Matrix below, a particular offence and penalty fall. Further, the Council considers factors (d) to (g) above, inclusive, to be primary objectives of financial penalties and will attach particular weight to them when determining the appropriate level of penalty.

2. FACTORS IN DETERMINING PENALTY LEVELS

Clearly, a single level penalty will not be appropriate in all cases and when assessing the level of penalty to be imposed it is expected that the maximum amount would be reserved for the worst offenders. The actual amount levied should reflect the severity of the case and the Council will have regard to the following:

- Culpability of the landlord – Factors to take into account when determining the culpability include where the offender:
 - Has the intention to cause harm, the highest culpability where an offence is planned;
 - Is reckless as to whether harm is caused, i.e. the offender appreciates at least some harm would be caused but proceeds giving no thought to the consequences, even though the extent of the risk would be obvious to most people;
 - Has knowledge of the specific risks entailed by his actions even though he does not intend to cause the harm that results; and
 - Is negligent in their actions.

Examples of Culpability

High (Deliberate Act)	Intentional breach by landlord or property agent or flagrant disregard for the law, i.e. failure to comply with a correctly served improvement notice
High (Reckless Act)	Actual foresight of, or wilful blindness to, risk of offending but risks nevertheless taken by the landlord or property agent; for example, failure to comply with HMO Management Regulations
Medium (Negligent Act)	Failure of the landlord or property agent to take reasonable care to put in place and enforce proper systems for avoiding commission of the offence; for example, part compliance with a schedule of

	works, but failure to fully complete all schedule items within notice timescale.
Low (Low or no culpability)	Offence committed with little or no fault on the part of the landlord or property agent; for example, obstruction by tenant to allow contractor access, damage caused by tenants.

Harm or Potential for Harm

In determining the level of harm the Council will have regard to:

- the person: i.e. physical injury, damage to health, psychological distress;
- the community; i.e. economic loss, harm to public health; and
- other types of harm; i.e. public concern/feeling over the impact of poor housing condition on the local neighbourhood.

The nature of the harm will depend on the personal characteristics and circumstances of the victim, e.g. tenant.

Where no actual harm has resulted from the offence, the Council will consider the relative danger that persons have been exposed to as a result of the offender's conduct, the likelihood of harm occurring and the gravity of harm that could have resulted.

Factors that indicate a higher degree of harm include:

- Multiple victims;
- Especially serious or psychological effect on the victim; and
- Victim is particularly vulnerable.

Examples of Harm Categories

High	Defect(s) giving rise to the offence poses a serious and substantial risk of harm to the occupants and/or visitors; for example, danger of electrocution, carbon monoxide poisoning or serious fire safety risk.
Medium	Defect(s) giving rise to the offence poses a serious risk of harm to the occupants and/or visitors; for example, falls between levels, excess cold, asbestos exposure.
Low	Defect(s) giving rise to the offence poses a risk of harm to the occupants and/or visitors; for example, localised damp and mould, entry by intruders.

Punishment of the Offender

The Council will also have regard to the following:

- A Civil Penalty should not be regarded as an easy or lesser option compared to prosecution;
- The penalty should be proportionate and reflect the severity of the offence; and
- The penalty should be set high enough to help ensure that it has a real economic impact on the offender and demonstrate the consequences of not complying with their responsibilities.

Deter the offender from repeating the offence

- The ultimate goal is to prevent further offending and help ensure the landlord fully complies with all their legal responsibilities in future.
- The level of penalty should be set at a high enough level to deter repeat offending.

Deter others from committing similar offences

- An important part of deterrence is the realisation that the Council is proactive in levying Civil Penalties where the need exists and that the level of Civil Penalty will be set high enough to punish the offender and deter repeat offending.
- Remove any financial benefit the offender may have obtained as a result of committing the offence.
- Ensure that the offender does not benefit as a result of committing an offence i.e. it should not be cheaper to offend than to ensure a property is well maintained and managed.

3. DETERMINING THE AMOUNT OF CIVIL PENALTY

In determining the level of a civil penalty, officers will have regard to the matrix set out below, which has been developed taking into the factors set out in the statutory guidance provided by Government.

The matrix is intended to provide an indicative minimum 'tariff' under the various offence categories, with the final level of the civil penalty adjusted in each case, and generally within the relevant band, to take into account aggravating and mitigating factors.

The Council may, exceptionally, increase the penalty above the band maximum or, again exceptionally, decrease it below the minimum 'tariff'. In order to meet the objectives of this policy and of financial penalties in particular, however, including the need for transparency and consistency in the use of such penalties, the Council will exercise its discretion to increase or decrease a penalty beyond band limits in exceptional circumstances only (excluding any Discounts as set out below). The Council will consider on a case-by-case basis, in light of the information with which it is provided, whether any such circumstances exist.

The table below sets out the interrelation between harm and culpability as an initial determinant of the Civil Penalty banding.

Band	Severity	Band Width (£)
1	Low Culpability/Low Harm	£0 to £4,999
2	Medium Culpability/Low Harm	£5,000 to £9,999
3	Low Culpability/ Medium Harm or High Culpability/ Low Harm	£10,000 to £14,999
4	Low Culpability/High Harm or Medium Culpability/ Medium Harm	£15,000 to £19,999
5	Medium Culpability/High Harm or High Culpability/Medium Harm	£20,000 to £24,999
6	High Culpability/High Harm	£25,000 to £30,000

Aggravating Factors

The starting point for the penalty may be increased by 3% for each aggravating factor up to a maximum of 15% of the initial penalty level.

In order to determine the final penalty the Council will consider all aggravating factors relevant to the case.

Below is a list which will be considered as part of the determination. This is not an exhaustive list and other factors may be considered depending on the circumstances of each case:

- Previous convictions having regard to the offence to which applies and time elapsed since the offence;
- Motivated by financial gain;
- Lack of co-operation/communication or obstruction of the investigation;
- Deliberate concealment of the activity/evidence;
- Offending over an extended period of time i.e. more than 6 months
- Number of items of non-compliance – greater the number the greater the potential aggravating factor;
- Record of non-compliance;
- Record of letting substandard accommodation;
- Record of poor management/ inadequate management provision;
- Lack of a tenancy agreement/rent paid in cash; and
- Already a member of an accreditation scheme or letting standard

Mitigating Factors

The starting point for the penalty may be decreased by 3% for each mitigating factor to a maximum 15% of the initial penalty level.

In order to determine the final penalty the Council will consider all mitigating factors relevant to the case.

Below is a list which will be considered as part of the determination. This is not an exhaustive list and other factors may be considered depending on the circumstances of each case:

- Co-operation with the investigation;
- Voluntary steps taken to address issues e.g. submits a licence application;
- Willingness to undertake training;
- Willingness to join Coventry City Council`s landlord accreditation scheme;
- Evidence of health reasons preventing reasonable compliance – mental health, unforeseen health issues, emergency health concerns;
- No previous convictions;
- Vulnerable individual(s) where vulnerability is linked to the commission of the offence;
- Good character and/or exemplary conduct; and
- Early admission of guilt i.e. within 1 month.

When considering aggravating and mitigating factors the Civil Penalty imposed must remain proportionate to the offence.

Reference will be made to Magistrates Court Sentencing Council guidelines when considering relevant aggravating and mitigating factors.

An offender will be assumed to be able to pay a penalty up to the maximum amount unless they can demonstrate otherwise.

Illustrative Examples

Failure to comply with an Improvement Notice

Maximum Court fine that can be levied for failure to comply with an Improvement Notice - Unlimited

An Improvement Notice served under Part 1 Housing Act 2004 specifies repairs/improvements that the recipient should carry out in order to address one or more identified Category 1 and/or Category 2 hazards in a property. Category 1 hazards are the most serious hazards, judged to have the highest risk of harm to the occupiers; the Council has a duty to take appropriate action where a dwelling is found to have one or more Category 1 hazards present.

In most cases, the service of an Improvement Notice will have followed an informal stage, where the landlord had been given the opportunity to carry out improvements without the need for formal action. In such cases, an identified failure to comply with an Improvement Notice will represent a continued failure on the part of the landlord to deal appropriately with one or more significant hazards affecting the occupier[s] of the relevant dwelling.

The Council would view the offence of failing to comply with the requirements of an Improvement Notice as a significant issue, exposing the tenant[s] of a dwelling to one or more significant hazards. The civil penalty for a landlord controlling five or less dwellings, with no other relevant factors or aggravating features (see below) would be regarded as a serious matter, representing a band 3 offence, attracting a civil penalty of at least £10,000.

Where a landlord or agent is controlling/owning a significant property portfolio and/or has demonstrated experience in the letting/management of property the failure to

comply with the requirements of an Improvement Notice would be viewed as being a severe matter attracting a civil penalty of £20000 or above.

Aggravating features/factors specific to non-compliance with an Improvement Notice

- The nature and extent of hazards that are present. Multiple hazards and/or severe/extreme hazards that are considered to have a significant impact on the health and/or safety of the tenant(s) in the property would justify an increase in the level of the civil penalty

Generic aggravating features/factors

The Council will have regard to the following general factors in determining the final level of the civil penalty:

- A previous history of non-compliance would justify an increased civil penalty. Examples of previous non-compliance would include previous successful prosecutions [including recent convictions that were 'spent'], works in default of the landlord and breaches of regulations/obligations, irrespective of whether these breaches had been the subject of separate formal action
- Any available information regarding the financial means of the offender, not restricted to just rental income from the rented home[s]

Failure to License offences

Maximum Court fine that can be levied for failure to license an HMO or Part 3 House – Unlimited

Failure to license a Mandatory 'HMO'

Under Part 2 Housing Act 2004, most higher risk HMOs occupied by 5 or more persons forming 2 or more households are required to hold a property licence issued by the local authority. HMO licensing was introduced to allow local authorities to regulate standards and conditions in high risk, multiply occupied residential premises. Through the property licence regime, local authorities ensure that the HMO has sufficient kitchens, baths/showers and WCs and place a limit on the number of persons permitted to occupy it and the licence holder is required to comply with a set of licence conditions.

The Council would view the offence of failing to licence an HMO as a significant failing; Licensing was introduced by the Government in order to regulate management, conditions, standards and safety in the properties considered to represent the highest risk to tenants as regards such matters as fire safety and overcrowding.

Under the Council's policy the civil penalty for a landlord controlling one or two HMO dwellings, with no other relevant factors or aggravating features (see below) would be regarded as a serious matter, representing a band 3 offence, attracting a civil penalty of at least £10000. Where a landlord or agent is controlling/owning a significant property portfolio, and/or has demonstrated experience in the letting/management of

property, the failure to license an HMO would be viewed as being a severe matter attracting a civil penalty of £20000 or above (a band 5 offence).

Aggravating features/factors specific to non-licensing offences

- The condition of the unlicensed property. The nature and extent of any significant hazards that are present would justify an increase in the level of the civil penalty. Equally, an HMO that was found to be poorly managed and/or lacking amenities/fire safety precautions and/or overcrowded would also justify an increased civil penalty.
- Any demonstrated evidence that the landlord/agent was familiar with the need to obtain a property licence e.g. the fact that they were a named licence holder or manager in respect of an already licensed premises.

Generic aggravating features/factors

As set out under 'Improvement Notice' above

Failure to licence a property under the Council's Additional (HMO) Licensing Scheme

The Council has designated the whole of the borough as an additional licensing area. The scheme came into force on 4th May 2020 and expires on 5th May 2025. Under the scheme, all HMOs occupied by three or more persons forming two or more households sharing one or more basic amenities such as a WC or kitchen, but which fall outside the scope of mandatory HMO licensing, will be required to hold an additional licence in order to be legally let as well as those HMOs that fall within the definition of self-contained flats under Section 257 of the Housing Act 2004.

The Council would view the offence of failing to license an HMO under its additional licensing scheme as a significant failing. The Council has introduced additional HMO licensing, amongst other reasons, in order to regulate management, conditions, standards and safety in the properties considered to represent a higher risk to tenants as regards such matters as fire safety and overcrowding compared with properties occupied by a single-family household.

Under the Council's policy the civil penalty for a landlord controlling one or two HMO dwellings, with no other relevant factors or aggravating features (see below) would be regarded as a moderate matter, representing a band 2 offence, attracting a civil penalty of at least £5000. Where a landlord or agent is controlling/owning a significant property portfolio, and/or has demonstrated experience in the letting/management of property, the failure to license an HMO would be viewed as being a serious matter attracting a civil penalty of £15000 or above (a band 4 offence).

Aggravating features/factors specific to non-licensing offences

- The condition of the unlicensed property. The nature and extent of any significant hazards that are present would justify an increase in the level of the civil penalty. Equally, an HMO that was found to be poorly managed and/or lacking amenities/fire safety precautions and/or overcrowded would also justify an increased civil penalty

- Any demonstrated evidence that the landlord/agent was familiar with the need to obtain a property licence e.g. the fact that they were a named licence holder or manager in respect of an already licensed premises

Generic aggravating features/factors

As set out under 'Improvement Notice' above

Breach of licence conditions

Maximum Court fine that can be levied for failure to comply with a licence condition - unlimited

All granted property licences impose a set of conditions on the licence holder. These conditions impose a variety of obligations relating to the letting, management and condition of the rented property, including:

- Undertaking Gas Safe and electrical checks;
- Installing and maintaining smoke alarms;
- Obtaining tenant references, providing written tenancy agreements and protecting deposits;
- Notifying the Council in any specified changes in circumstances;
- Carrying out specified measures to prevent or address anti-social behaviour
- Maintaining the property in reasonable repair;
- Ensuring that the gardens are tidy and free from refuse; and
- For HMO, licences granted under part 2, carrying out works that were a condition of the granted licence or reducing occupation levels as necessary.

It is important that the manager of a licensed property complies with all imposed conditions, but the Council recognises that a failure to comply with certain licence conditions is likely to have a much bigger impact on the safety and comfort of residents than others.

In determining the level of a civil penalty, the Council will therefore initially consider:

- a) The number and nature of the licence condition breaches; and
- b) The nature and extent of deficiencies within each specified licence condition

Clearly, the circumstances of breach of licence condition offences have the potential to vary widely from case to case but, as a guide:

- The civil penalty for a landlord controlling five or less dwellings (or 1 or 2 HMOs), with no other relevant factors or aggravating features [see below], for a failure to provide tenants with their contact details or for failing to address relatively minor disrepair would each be regarded as a moderate band 1 offence, attracting a civil penalty of £1000. Where a landlord or agent is controlling/owning a significant property portfolio, and/or has demonstrated experience in the letting/management of property, these same offences would be regarded as a moderate band 2 offence, attracting a civil penalty of £5000 for a 'professional' landlord or agent.

- The civil penalty for a landlord controlling five or less dwellings (or 1 or 2 HMOs), with no other relevant factors or aggravating features (see below), for a failure to provide or maintain smoke alarms in working order, to fail to address serious ASB issues such as the use of a licensed premises for illegal purposes or the failure to carry out works/improvements imposed as a condition of a granted HMO licence would each be regarded as a serious band 3 offence, attracting a civil penalty of at least £10000. Where a landlord or agent is controlling/owning a significant property portfolio, and/or has demonstrated experience in the letting/management of property, these same offences would be regarded as a severe band 5 offence, attracting a civil penalty of £20000 or above for a 'professional' landlord or agent.

Aggravating features/factors specific to non-licensing offences

- None – the nature of the licence condition breaches and their impact upon the occupiers would be an integral part of the initial assessment process

Generic aggravating features/factors

As set out under 'Improvement Notice' above

Failure to Comply with The Management of Houses in Multiple Occupation (England) Regulations

Maximum Court fine that can be levied for failure to comply with each individual regulation - unlimited

The Management of Houses in Multiple Occupation (England) Regulations 2006 impose duties on the persons managing certain HMOs in respect of:

- Regulation 3 - Providing information to occupiers
- Regulation 4 - Taking safety measures, including fire safety measures
- Regulation 5 - Maintaining the water supply and drainage
- Regulation 6 - Supplying and maintaining gas and electricity, including having these services/appliances regularly inspected
- Regulation 7 - Maintaining common parts
- Regulation 8 - Maintaining living accommodation
- Regulation 9 - Providing sufficient waste disposal facilities

Note - The Licensing and Management of Houses in Multiple Occupation (Additional Provisions) (England) Regulations 2007 place similar obligations on the managers of HMOs as defined by Section 257 Housing Act 2004.

It is important that the manager of an HMO complies with all regulations, but the Council recognises that a failure to comply with certain regulations is likely to have a much bigger impact on the safety and comfort of residents than others. Furthermore, and using Regulation 8 as an example, a breach of this regulation could relate to defects to an individual window in one HMO but multiple defects to the structure, fixtures & fittings in number of rooms in a second HMO.

In determining the level of a civil penalty, the Council will therefore initially consider;

- a) The number and nature of the management regulation breaches; and
- b) The nature and extent of deficiencies within each regulation

Clearly, the circumstances of HMO Management Regulation offences have the potential to vary widely from case to case but, as a guide:

- The civil penalty for a landlord controlling one or two HMO dwellings, with no other relevant factors or aggravating features [see below], for a failure to display a notice containing their contact details or for failing to address relatively minor disrepair would each be regarded as a moderate band 1 offence, attracting a civil penalty of £1000. Where a landlord or agent is controlling/owning a significant property portfolio, and/or has demonstrated experience in the letting/management of property these same offences would be regarded as a moderate band 2 offence, attracting a civil penalty of at least £5000 for a 'professional' landlord or agent.
- The civil penalty for a landlord controlling one or two HMO dwellings, with no other relevant factors or aggravating features (see below), for a failure to maintain fire alarms in working order, to maintain essential services to an HMO or to fail allow an HMO to fall into significant disrepair would each be regarded as a serious band 3 offence, attracting a civil penalty of at least £10000. Where a landlord or agent is controlling/owning a significant property portfolio, and/or has demonstrated experience in the letting/management of property these same offences would be regarded as a severe band 5 offence, attracting a civil penalty of £20000 or above for a 'professional' landlord or agent.

Aggravating features/factors specific to non-licensing offences

- None – the nature of the Management Regulation breaches and their impact upon the occupiers would be an integral part of the initial assessment process

Generic aggravating features/factors

As set out under 'Improvement Notice' above

4. PROCESS

The procedure for imposing a civil penalty is set out in Schedule 13A of the Housing Act 2004 and Schedule 113 of the Housing and Planning Act 2016 and summarised below.

Coventry City Council must give the person a notice of its proposal ('notice of intent') to impose a civil penalty. The notice of intent must set out:

- the amount of the proposed financial penalty;
- the reasons for proposing to impose the penalty; and
- information about the right of the landlord to make representations

The notice of intent must be given no later than 6 months after the authority has sufficient evidence of the conduct to which the penalty relates, or at any time when the conduct is continuing.

A person who is given a notice of intent may make written representations to the local housing authority about the intention to impose a financial penalty. Any representations must be made within 28 days from the date the notice was given.

After the end of the period for representations, the local housing authority must decide whether to impose a penalty and, if so, the amount of the penalty. If the authority decides to impose a financial penalty, it must give the person a notice ('final notice') requiring that the penalty is paid within 28 days.

The final notice must set out:

- the amount of the financial penalty;
- the reasons for imposing the penalty;
- information about how to pay the penalty;
- the period for payment of the penalty (28 days);
- information about rights of appeal; and
- the consequences of failure to comply with the notice.

The local housing authority may at any time:

- withdraw a notice of intent or final notice; or
- reduce the amount specified in a notice of intent or final notice.

On receipt of a final notice imposing a financial penalty a landlord can appeal to the First Tier Tribunal against the decision to impose a penalty and/or the amount of the penalty. The appeal must be made within 28 days of the date the final notice was issued. The final notice is suspended until the appeal is determined or withdrawn.

Civil Penalties – Multiple Offences

Where the local housing authority are satisfied that more than one offence is being committed concurrently in respect of a single property, they may issue multiple Civil Penalty Notices, (for example, where there are multiple breaches of the HMO Management Regulations).

However, where satisfied on the merits of the case and/or where the authority consider that issuing multiple penalties at the same time would result in an excessive cumulative penalty, nothing in this policy shall require the authority to do that. The authority may take action in respect of one or some of the offences and warn the offender that future action in respect of the remaining offences will be taken if they continue.

Discounts

The Council will automatically apply the following discounted rates to any imposed financial penalties in the following circumstances:

- **In the event that the offender complied with the identified breach (for example by making an application to license a previously unlicensed address) within the representation period at the ‘Notice of Intent’ stage, the Council would reduce the level of any imposed civil penalty by 20%;**

Illustrative example

The landlord of an HMO property fails to obtain a licence. They only operate one HMO and there are no other relevant factors or aggravating features. The offence is regarded as a serious matter, representing a band 3 offence, attracting a civil penalty of at least £10,000. Upon receipt of the ‘Notice of Intent’ to impose a £10,000 financial penalty, the landlord makes a complete application for the HMO licence within the period allowed for representations. No other representations [or representations that are upheld] are made to the Council.

The Council issues a ‘Final Notice’ imposing a financial penalty of £8,000 (£10,000 with a 20% discount having been deducted due to compliance during the representation period).

Totality of offences

When arriving at penalty levels the total is inevitably cumulative, however the Council will determine the fine for each offence based on the relevant criteria above so far as they are known, or appear, to the Council and add up the penalties for each offence and consider if they are just and proportionate. If the aggregate total is not just and proportionate the Council will consider how to reach a just and proportionate penalty level.

There are a number of ways in which this can be achieved, for example:

- where an offender is to be fined for two or more offences that arose out of the same incident or where there are multiple offences of a repetitive kind, especially when committed against the same person, it will often be appropriate to impose for the most serious offence a fine which reflects the totality of the offending where this can be achieved within the maximum penalty for that offence.
- where an offender is to be fined for two or more offences that arose out of different incidents, it will often be appropriate to impose a separate fine for each of the offences. The Council will add up the fines for each offence and consider if they are just and proportionate. If the aggregate amount is not just and proportionate the Council will consider whether all of the fines can be proportionately reduced. Separate fines will then be considered. Where separate fines are passed, the Council will be careful to ensure that there is no double-counting.

Policy on Private Sector Housing Enforcement

Appendix 3 – Imposing Civil Penalties under the Tenant Fees Act 2019

Introduction

Section 8 of The Tenant Fees Act 2019 provides local authorities with the power to impose a civil penalty in situations where a breach of the Tenant Fees Act 2019 has been identified.

Under the Tenant Fees Act, landlords are prohibited from imposing charges or payments in connection with a tenancy or licence unless that payment is one of a specified number of 'permitted payments'. Each separate 'prohibited payment' represents a breach of the Tenant Fees Act 2019:

- The Tenant Fees Act 2019 enables the Council to serve notices imposing Civil Penalties of up to a maximum of £5,000 where a landlord or agent has required a tenant to make a 'prohibited payment';
- The Tenant Fees Act 2019 enables the Council to impose Civil Penalties of up to a maximum of £30,000 where a landlord or agent has required a tenant to make a 'prohibited payment' within 5 years of a previous conviction or the imposition of a Civil Penalty (as an alternative to instigating prosecution proceedings);
- The Tenant Fees Act 2019 enables the Council to serve notices imposing Civil Penalties of up to a maximum of £5,000 where a landlord or agent is in breach of the requirement to repay the holding deposit.

This guidance outlines the Council's policy in setting the level of a civil penalty in each case where it has been determined to issue a civil penalty, including cases where it has determined to impose a civil penalty as an alternative to prosecution proceedings.

Its primary objective, is to promote both transparency and consistency in the imposition of Civil Penalties so that, for example, those affected know how the Council will generally penalise relevant offences and are assured that, generally, like cases will be penalised similarly, and different cases penalised differently.

For these reasons in particular, the Council will depart from this policy and the guidance below in exceptional circumstances only. It will consider carefully, and on a case by-case basis, whether any such circumstances exist, in light of the information with which it is provided. The further objectives of using Civil Penalties in particular as a means of enforcement are explained below.

Coventry City Council has developed this policy on deciding financial penalties and the appropriateness of prosecution as an alternative to imposing financial penalties under the relevant letting agency legislation.

It applies in relation to any decision to any decision made by the Council in its capacity as Enforcement Authority and Lead Enforcement Authority under Section's 7 & 24 of the Tenants Fees Act 2019 respectively.

For clarity, "relevant letting agency legislation" means:-

1. The Tenant Fees Act 2019, "the TFA 2019";
2. Part 3, Chapter 3 of the Consumer Rights Act 2015;
3. Section 83(1) and 84(1) of the Enterprise and Regulatory Reform Act 2013 ; and
4. Sections 133 – 135 of the Housing and Planning Act 2016.

1. Legal Reference

The TFA 2019 prohibits the charging of fees in respect of an Assured Shorthold Tenancy ("a tenancy"), other than those which are specifically permitted by Schedule 1 of the TFA 2019, and amends other legislation as follows:

- a. in respect of the duty of letting agents to publicise fees etc. under Section 87 of the Consumer Rights Act 2015.
- b. in relation to the duty placed on enforcement authorities to have regard to any guidance issued by the Secretary of State ("the SoS") relating to the enforcement of an order under s83(1) of 84(1) as per Section 85 of the Enterprise & Regulatory Reform Act 2013.
- c. in respect of the duty to enforce being subject to Section 26 of the TFA 2019 under Article 7 of the Redress Schemes for Lettings Agency Work and Property Management Work (requirement to belong to a Scheme etc.) England) Order 2014.
- d. in relation to the meaning of 'Lead Enforcement Authority', "the LEA", under Section 135 (enforcement of client money protection scheme regulations) of the Housing and Planning Act 2016.
- e. in respect of the LEA as an alternative to the SoS where the SoS is not the LEA under Article 7 of the Redress Schemes for Lettings Agency Work and Property Management Work (requirement to belong to a Scheme etc.) England) Order 2014.

2. TFA 2019 Sanctions

The TFA 2019 provides that enforcement authorities may impose financial penalties of up to £30,000 depending on the breach as follows:

- a. In respect of Prohibited Payments under s1 & s2 of the TFA 2019 a financial penalty not exceeding £5,000 for a first breach.
- b. Under s12 of the TFA 2019 a second or subsequent breach within 5 years of the previous breach provides for a financial penalty not exceeding

£30,000.00 and there is alternative power to prosecute in the Magistrates Court where an unlimited fine may be imposed.

The Council will determine what is the most appropriate and effective sanction and whether it is appropriate to impose a financial penalty or prosecute having due regard to the Coventry City Council Enforcement Policy and as the Enforcement Authority, the Private Sector Housing Enforcement Policy.

In appropriate circumstances consideration will be given to less formal action such as warning letters or advice, in an effort to secure compliance, and will be done so in accordance with the relevant Enforcement Policy.

3. Consequential Amendments brought about by the TFA 2019

The TFA 2019 amends the legislation referred to in paragraph 1 above which separately provides that penalties may be imposed as follows:

- i In respect of a failure of Letting Agents to publicise their fees as required by s83(3) of the CRA 2015 a financial penalty not exceeding £5,000.
- ii. In respect of a failure by any person engaged in Letting Agency or Property Management work who fails to hold membership of a Redress Scheme as required by Article 3 Redress Schemes for Lettings Agency Work and Property Management Work (requirement to belong to a Scheme etc.) England) Order 2014 (in respect of Lettings Agency work) or Article 5 (in respect of property management work) to a financial penalty not exceeding £5,000. Note that it is not sufficient to simply register for redress – the correct category of membership must be obtained depending on the work carried out.
- iii. In respect of a failure by a property agent who holds client money to belong to an approved or designated Client Money Protection (“CMP”) Scheme as required by Regulation 3 of the Client Money Protection Schemes for Property Agents (Requirement to Belong to a Scheme etc.) Regulations 2019, a financial penalty not exceeding £30,000.
- iv. In respect of a failure to obtain a certificate confirming membership or display that certificate as required or publish a copy of that certificate on the relevant website (where one exists) or produce a copy of the certificate free of charge to any person reasonably requiring it as required by Regulation 4(1) of the Client Money Protection Schemes for Property Agents (Requirement to Belong to a Scheme etc.) Regulations 2019 a financial penalty not exceeding £5,000.
- v. In respect of a failure by a property agent to notify any client within 14 days of a change in the details of an underwriter to the CMP scheme or that the membership of the CMP scheme has been revoked as required by Regulation 4(2) of the Client Money Protection Schemes for Property Agents (Requirement to Belong to a Scheme etc.) Regulations 2019 a financial penalty not exceeding £5,000.

4. Statutory Guidance.

The Ministry of Housing, Communities & Local Government (“MHCLG”) has published the following document; Tenant Fees Act 2019: Statutory Guidance for enforcement authorities.

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/922896/Tenancy Fees Act -
Statutory guidance for enforcement authorities.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/922896/Tenancy_Fees_Act_-_Statutory_guidance_for_enforcement_authorities.pdf)

This is statutory guidance to which enforcement authorities must have regard to in relation to enforcing the TFA 2019. This statutory guidance recommends certain factors that an enforcement authority should take into account when deciding on the level of financial penalties under the TFA 2019 and further recommends that enforcement authorities develop and document their own Policy on determining the appropriate level of financial penalty in a particular case.

5. Determining the level of the financial penalty

In accordance with the provisions of the TFA 2019 the level of financial penalties is to be determined by the Council. Although the statutory guidance recommends factors which may be taken into account it does not go into any significant level of detail in this regard. Each of the following factors will be considered as a part of the Council’s decision making process and they are:

- a. The history of compliance/non-compliance;
- b. The severity of the breach V4 4;
- c. Deliberate concealment of the activity and/or evidence;
- d. Knowingly or recklessly supplying false or misleading evidence;
- e. The intent of the landlord/agent, individual and/or corporate body;
- f. The attitude of the landlord/agent;
- g. The deterrent effect of a prosecution on the landlord/agent and others; and
- h. The extent of financial gain as a result of the breach

Although the Council has therefore a wide discretion in determining the appropriate level of financial penalty in any particular case, regard has been given to the statutory guidance when making this policy.

The Council has also decided to base this policy on the principles set out in Coventry City Council’s policy entitled ‘Civil Penalty as an alternative to prosecution under the Housing Act 2004’ with the recognition that with the exception of the limited power to prosecute referred to in Section 2.b of this policy prosecution is not otherwise an option under the TFA 2019.

The civil penalty as an alternative to prosecution under the Housing Act 2004 policy was reviewed in 2018 and was informed by the principles contained in; Sentencing Council Health and Safety Offences, Corporate Manslaughter and Food Safety and

Hygiene Offences Definitive Guideline. The Council believes this to be a fair, relevant and reasonable model to follow.

Appendix 1 of this policy contains the processes that the Council will use in order to determine the level of financial penalty under the TFA 2019. All stages subsequent to the issue of a Notice of Intent are subject to statutory time limits and the suspension of the process should an appeal be made to the First Tier Tribunal. V4 5

Appendix 1 – The Council’s process for determining the level of penalty to set:

STEP ONE – Determining the offence category

The Council will determine the breach category using only the culpability and category of harm factors below. Where an offence does not fall squarely into a category, individual factors may require a degree of weighting to make an overall assessment. Other discretionary factors may also be applied in order to reflect consistency and may consider decisions in other UK jurisdictions where they contain some relevant and persuasive content.

Culpability

Very high: Where the Landlord or Agent intentionally breached, or flagrantly disregarded, the law or has/had a high public profile and knew their actions were unlawful.

High: Actual foresight of, or wilful blindness to, risk of a breach but risk nevertheless taken.

Medium: Breach committed through act or omission which a person exercising reasonable care would not commit.

Low: Breach committed with little fault, for example, because:

- significant efforts were made to address the risk although they were inadequate on the relevant occasion.
- there was no warning/circumstance indicating a risk.
- failings were minor and occurred as an isolated incident.

Harm

The following factors relate to both actual harm and risk of harm. Dealing with a risk of harm involves consideration of both the likelihood of harm occurring and the extent of it if it does.

Category 1 – High Likelihood of Harm

- Serious adverse effect(s) on individual(s) and/or having a widespread impact due to the nature and/or scale of the Landlord’s or Agent’s business.
- High risk of an adverse effect on individual(s) – including where persons are vulnerable.

Category 2 – Medium Likelihood of Harm

- Adverse effect on individual(s) (not amounting to Category 1)
- Medium risk of an adverse effect on individual(s) or low risk of serious adverse effect.
- Tenants and/or legitimate landlords or agents substantially undermined by the conduct.
- The Council's work as a regulator is inhibited.
- Tenant or prospective tenant misled

Category 3 - Low Likelihood of Harm

- Low risk of an adverse effect on actual or prospective tenants.
- Public misled but little or no risk of actual adverse effect on individual(s).

We will define harm widely and victims may suffer financial loss, damage to health or psychological distress (especially vulnerable cases). There are gradations of harm within all of these categories.

The nature of harm will depend on personal characteristics and circumstances of the victim and the assessment of harm will be an effective and important way of taking into consideration the impact of a particular crime on the victim.

In some cases, no actual harm may have resulted and enforcement authority will be concerned with assessing the relative dangerousness of the offender's conduct; it will consider the likelihood of harm occurring and the gravity of the harm that could have resulted. To the community Some offences cause harm to the community at large (instead of or as well as to an individual victim) and may include economic loss, harm to public health, or interference with the administration of justice.

STEP TWO - Starting point and category range

Having determined the category that the breach falls into, the Council will refer to the following starting points to reach an appropriate level of civil penalty within the category range. The Council will then consider further adjustment within the category range for aggravating and mitigating features.

Obtaining financial information

The statutory guidance advises that local authorities can use their powers under Schedule 5 of the Consumer Rights Act 2015 to, as far as possible, make an assessment of a Landlord or Agent's assets and any income (not just rental or fee income) they receive when determining an appropriate penalty. The Council will use such lawful means as are at its disposal to identify where assets might be found.

In setting a financial penalty, the Council may conclude that the Landlord or Agent is able to pay any financial penalty imposed unless the Council has obtained, or the Landlord or Agent has supplied, any financial information to the contrary. The subject of a Final Notice, or a Notice of Intent where the subject does not challenge it, will be expected to disclose to the Council such data relevant to his/her financial position to facilitate an assessment of what that person can reasonably afford to pay. Where the

Council is not satisfied that it has been given sufficient reliable information, the Council will be entitled to draw reasonable inferences as to the person's means from evidence it has received, or obtained through its own enquiries, and from all the circumstances of the case which may include the inference that the person can pay any financial penalty.

Starting points and ranges

The tables in Appendices 4-10 below give the starting points, minimum and maximum financial penalties for each harm category and level of culpability for each type of breach.

- Appendix 4 First breach in respect of a Prohibited Payment
- Appendix 5 Second & subsequent breach in respect of a Prohibited Payment
- Appendix 6 Breach of Publication of Fees requirements
- Appendix 7 Breach in respect of membership of a Redress Scheme
- Appendix 8 Breach in respect of membership of a Client Money Protection Scheme
- Appendix 9 Breach in respect of certificates in respect of a Client Money Protection Scheme
- Appendix 10 Breach of transparency requirements in respect of a Client Money Protection Scheme

Context

Below is a list of some, but not all factual elements that provide the context of the breach and factors relating to the Landlord or Agent. The Council will identify whether any combination of these, or other relevant factors, should result in an upward or downward adjustment from the starting point. In particular, relevant recent convictions are likely to result in a substantial upward adjustment. In some cases, having considered these factors, it may be appropriate to move outside the identified category range which will not exceed the statutory maximum permitted in any case.

Factors increasing seriousness

Aggravating factors:

- Previous breaches of the TFA 2019
- Previous convictions, having regard to:
 - the nature of the offence to which the conviction relates and its relevance to the current breach; and
 - the time that has elapsed since the conviction.

Other aggravating factors may include:

- Motivated by financial gain
- Deliberate concealment of illegal nature of activity
- Established evidence of wider/community impact
- Obstruction of the investigation
- Record of poor compliance

- Refusal of advice or training or to become a member of an Accreditation scheme

Factors reducing seriousness or reflecting personal mitigation

- No previous or no relevant/recent breaches
- No previous convictions or no relevant/recent convictions
- Steps voluntarily taken to remedy problem
- High level of co-operation with the investigation, beyond that which will always be expected
- Good record of relationship with tenants
- Self-reporting, co-operation and acceptance of responsibility
- Good character and/or exemplary conduct
- Mental disorder or learning disability, where linked to the commission of the breach
- Serious medical conditions requiring urgent, intensive or long-term treatment and supported by medical evidence

STEP THREE - General principles to consider in setting a penalty

The Council will finalise the appropriate level of penalty so that it reflects the seriousness of the offence and the Council must take into account the financial circumstances of the Landlord or Agent if representations are made by the Landlord or Agent following the issue of a Notice of Intent.

The level of financial penalty should reflect the extent to which the conduct fell below the required standard. The financial penalty should meet, in a fair and proportionate way, the objectives of punishment, deterrence and the removal of gain derived through the commission of the breach; it should not be cheaper to breach than to take the appropriate precautions and a fundamental principle involved is that there should be no financial gain to the perpetrator from the commission of the breaches.

If issuing a financial penalty for more than one breach, or where the offender has already been issued with a financial penalty, The Council will consider whether the total penalties are just and proportionate to the offending behaviour and will have regard to the factors in STEP EIGHT below.

STEP FOUR- Issue Notice of Intent

The Council will issue a Notice of Intent within 6 months of the enforcement authority having sufficient evidence that the Landlord or Agent has breached the TFA 2019. If the breach is ongoing the 6-month deadline continues until the breach ceases. A Notice of Intent can be served spontaneously.

While there are slight variations in the statutory requirements according to which breach is being addressed a Notice of Intent will typically contain the date of the Notice, the amount of the proposed penalty, the reason for imposing the penalty and how the recipient can make representations concerning the penalty.

STEP FIVE – Consideration of representations and review of financial penalty where appropriate

The Council should review the penalty and, if necessary adjust the initial amount reached at STEP FOUR, and represented in the Notice of Intent, to ensure that it fulfils the general principles set out below.

Any quantifiable economic benefit(s) derived from the breach, including through avoided costs or operating savings, should normally be added to the total financial penalty arrived at in step two. Where this is not readily available, the Council may draw on information available from enforcing authorities and others about the general costs of operating within the law. Whether the penalty will have the effect of putting the offender out of business will be relevant but in some serious cases this might be an acceptable outcome.

STEP SIX – Reductions

The Council will consider any factors which indicate that a reduction in the penalty is appropriate and in so doing will have regard to the following factors relating to the wider impacts of the financial penalty on innocent third parties; such as (but not limited to):

- The impact of the financial penalty on the Landlord or Agent's ability to comply with the law or make restitution where appropriate; and
- The impact of the financial penalty on employment of staff, service users, customers and the local economy.

The following factors will be considered in setting the level of reduction. When deciding on any reduction in a financial penalty, consideration will be given to:

- The stage in the investigation or thereafter when the offender accepted liability;
- The circumstances in which they admitted liability; and
- The degree of co-operation with the investigation.

The maximum level of reduction in a penalty for an admission of liability will be one-third. In some circumstances there will be a reduced or no level of discount. This may occur for example where the evidence of the breach is overwhelming or there is a pattern of breaching conduct.

Any reduction should not result in a penalty which is less than the amount of gain from the commission of the breach itself.

STEP SEVEN - Additional actions

In all cases the Council must consider whether to take additional action. These may include further enforcement action itself or reference to other organisations where appropriate.

STEP EIGHT – Totality of breaching conduct

Where the offender is issued with more than one financial penalty, the Council should consider the following guidance from the definitive guideline on Offences Taken into consideration and totality which appears to the Council to be an appropriate reference and guide.

As the total financial penalty is inevitably cumulative the Council should determine the financial penalty for each individual breach based on the seriousness of the breach and taking into account the circumstances of the case including the financial circumstances of the Landlord or Agent so far as they are known, or appear, to the Council.

The Council should add up the financial penalties for each offence and consider if they are just and proportionate. If the aggregate total is not just and proportionate the Council should consider how to reach a just and proportionate total financial penalty. There are a number of ways in which this can be achieved.

For example:

Where a Landlord or Agent is to be penalised for two or more breaches or where there are multiple breaches of a repetitive kind, especially when committed against the same person, it will often be appropriate to impose for the most serious breach a financial penalty which reflects the totality of the conduct where this can be achieved within the maximum penalty for that breach. No separate penalty should be imposed for the other breaches. Where a Landlord or Agent is to be penalised for two or more breaches that arose out of different incidents, it will often be appropriate to impose separate financial penalties for each breach. The Council should add up the financial penalties for each breach and consider if they are just and proportionate. If the aggregate amount is not just and proportionate the Council should consider whether all of the financial penalties can be proportionately reduced. Separate financial penalties should then be imposed.

Where separate financial penalties are passed, the Council must take care to ensure that there is no double-counting.'

STEP NINE – Recording the decision

The officer making a decision about a financial penalty will record their decision giving reasons for coming to the amount of financial penalty that will be imposed.

Appendix 2 – Non exhaustive list of vulnerable people:

Young adults and children

Persons vulnerable by virtue of age

Persons vulnerable by virtue of disability or sensory impairment

People on a low income

Persons with a Drug or alcohol addiction

Victims of domestic abuse

Children in care or otherwise vulnerable by virtue of age

People with complex health conditions

People exploited where English is not their first language.

Victims of Trafficking or sexual exploitation

Refugees

Asylum seekers People at risk of harassment or eviction

People at risk of homelessness.

Appendix 3 – Non exhaustive list of relevant offences /breaches:

Housing law or landlord and tenant related

Offences under:

The Public Health Acts of 1936 and 1961

The Building Act 1984

The Environmental Protection Act 1990

The Town and Country Planning Act 1990

The Prevention of Damage by Pests Act 1949

The Protection from Eviction Act 1977

The Local Government (Miscellaneous Provisions) Acts of 1982 and 1976

The Housing Grants, Construction and Regeneration Act 1996

The Local Government and Housing Act 1989

The Housing Act 2004

The Consumer Protection from Unfair Trading Regulations 2008

Offences involving fraud

Offences in which the victim has been deprived of money, property or other benefit by misrepresentation/deception on the part of the offender including:

- Theft
- Burglary
- Fraud
- Benefit fraud (particularly where tenants are in receipt of Housing Benefit)
- Conspiracy to defraud
- Obtaining money or property by deception
- People trafficking
- Being struck off as a company director

Offences involving violence

A conviction for the offence of:

- Murder
- Manslaughter
- Arson
- Malicious wounding or grievous bodily harm
- Grievous bodily harm with intent
- Actual bodily harm
- Grievous bodily harm
- Robbery
- Criminal damage where the intent was to intimidate or was racially aggravated
- Common assault
- Common assault which is racially aggravated
- Assault occasioning actual bodily harm
- Possession of an offensive weapon
- Possession of a firearm

Offences involving drugs

Consideration should be given to the nature of the offence and what bearing it could have on the Landlord or Agents business activities. The nature, quantity, purity and class of drugs should be taken into account. In addition where an offence of possession with intent to supply is involved regard should be had to the role and importance of, the subject in the supply chain.

Offences involving sexual offences

An offence contained in schedule 3 of the Sexual Offences Act 2003.

Unlawful discrimination

Unlawful discrimination can include findings of an Industrial Tribunal on unlawful employment practice such as discrimination under the Disability Discrimination Act. Consideration should be given to the nature of the unlawful discrimination and what bearing it could have on the management of a licensable property.

Other offences

- Modern Slavery/ Human Trafficking
- Offences involving the recruitment, transportation, transfer, harbouring or receipt of persons, by means of the threat or use of force or other forms of coercion, of abduction, of fraud, of deception, of abuse of power or of a position of vulnerability or of the giving or receiving of payments or benefits to achieve the consent of a person having control of another person, for the purpose of exploitation is likely to attach a lower level of culpability.

Appendix 4 – Financial Penalty in the case of a first breach in respect of Prohibited Payments.

The table below gives the starting points, minimum and maximum financial penalties for each harm category and level of culpability. Where exceptional circumstances apply the Council may reduce the minimum penalties further but may not increase them above the maximum permitted of £5000.

	Starting point (£)	Range	
		Min (£)	Max (£)
Low culpability			
Harm category 3	1250	250	2250
Harm Category 2	1500	500	2500
Harm Category 1	1750	750	2750
Medium culpability			
Harm category 3	2000	1000	3000
Harm Category 2	2250	1250	3250
Harm Category 1	2500	1500	3500
High culpability			
Harm category 3	2750	1750	3750
Harm Category 2	3000	2000	4000
Harm Category 1	3250	2250	4250
Very high culpability			
Harm category 3	3500	2500	4500
Harm Category 2	3750	2750	4750
Harm Category 1	4000	3000	5000

Appendix 5 – Financial Penalty in the case of a second or subsequent breach in respect of Prohibited Payments within 5 years of a previous breach.

The table below gives the starting points, minimum and maximum financial penalties for each harm category and level of culpability. Where exceptional circumstances apply the Council may reduce the minimum penalties further but may not increase them above the maximum permitted of £30000.

		Range	
	Starting point (£)	Min (£)	Max (£)
Low culpability			
Harm category 3	3500	2000	8000
Harm Category 2	6500	4000	10000
Harm Category 1	8500	4500	15000
Medium culpability			
Harm category 3	6500	4750	17000
Harm Category 2	10500	5000	20000
Harm Category 1	12500	5500	22000
High culpability			
Harm category 3	10500	5500	20000
Harm Category 2	15000	6250	24000
Harm Category 1	18000	7000	26000
Very high culpability			
Harm category 3	15000	7000	24000
Harm Category 2	17500	7250	28000
Harm Category 1	20000	7500	30000

Appendix 6 – Financial Penalty in the case of a breach in respect of Publication of Fees.

The table below gives the starting points, minimum and maximum financial penalties for each harm category and level of culpability. Where exceptional circumstances apply the Council may reduce the minimum penalties further but may not increase them above the maximum permitted of £5000.

	Starting point (£)	Range	
		Min (£)	Max (£)
Low culpability			
Harm category 3	1250	250	2250
Harm Category 2	1500	500	2500
Harm Category 1	1750	750	2750
Medium culpability			
Harm category 3	2000	1000	3000
Harm Category 2	2250	1250	3250
Harm Category 1	2500	1500	3500
High culpability			
Harm category 3	2750	1750	3750
Harm Category 2	3000	2000	4000
Harm Category 1	3250	2250	4250
Very high culpability			
Harm category 3	3500	2500	4500
Harm Category 2	3750	2750	4750
Harm Category 1	4000	3000	5000

Appendix 7 – Financial Penalty in the case of a breach in respect of Membership of a Redress Scheme.

The table below gives the starting points, minimum and maximum financial penalties for each harm category and level of culpability. Where exceptional circumstances apply the Council may reduce the minimum penalties further but may not increase them above the maximum permitted of £5000.

	Starting point (£)	Range	
		Min (£)	Max (£)
Low culpability			
Harm category 3	1250	250	2250
Harm Category 2	1500	500	2500
Harm Category 1	1750	750	2750
Medium culpability			
Harm category 3	2000	1000	3000
Harm Category 2	2250	1250	3250
Harm Category 1	2500	1500	3500
High culpability			
Harm category 3	2750	1750	3750
Harm Category 2	3000	2000	4000
Harm Category 1	3250	2250	4250
Very high culpability			
Harm category 3	3500	2500	4500
Harm Category 2	3750	2750	4750
Harm Category 1	4000	3000	5000

Appendix 8 – Financial Penalty in the case of a breach in respect of a failure to obtain membership of a Client Money Protection Scheme

The table below gives the starting points, minimum and maximum financial penalties for each harm category and level of culpability. Where exceptional circumstances apply the Council may reduce the minimum penalties further but may not increase them above the maximum permitted of £30000.

		Range	
	Starting point (£)	Min (£)	Max (£)
Low culpability			
Harm category 3	3500	2000	8000
Harm Category 2	6500	4000	10000
Harm Category 1	8500	4500	15000
Medium culpability			
Harm category 3	6500	4750	17000
Harm Category 2	10500	5000	20000
Harm Category 1	12500	5500	22000
High culpability			
Harm category 3	10500	5500	20000
Harm Category 2	15000	6250	24000
Harm Category 1	18000	7000	26000
Very high culpability			
Harm category 3	15000	7000	24000
Harm Category 2	17500	7250	28000
Harm Category 1	20000	7500	30000

Appendix 9 – Financial Penalty in the case of a breach in respect of issues relating to certificates of evidence of Membership of a Client Money Protection Scheme.

The table below gives the starting points, minimum and maximum financial penalties for each harm category and level of culpability. Where exceptional circumstances apply the Council may reduce the minimum penalties further but may not increase them above the maximum permitted of £5000.

		Range	
	Starting point (£)	Min (£)	Max (£)
Low culpability			
Harm category 3	1250	250	2250
Harm Category 2	1500	500	2500
Harm Category 1	1750	750	2750
Medium culpability			
Harm category 3	2000	1000	3000
Harm Category 2	2250	1250	3250
Harm Category 1	2500	1500	3500
High culpability			
Harm category 3	2750	1750	3750
Harm Category 2	3000	2000	4000
Harm Category 1	3250	2250	4250
Very high culpability			
Harm category 3	3500	2500	4500
Harm Category 2	3750	2750	4750
Harm Category 1	4000	3000	5000

Appendix 10 – Financial Penalty in the case of a breach in respect of transparency issues relating to Membership of a Client Money Protection Scheme.

The table below gives the starting points, minimum and maximum financial penalties for each harm category and level of culpability. Where exceptional circumstances apply the Council may reduce the minimum penalties further but may not increase them above the maximum permitted of £5000.

		Range	
	Starting point (£)	Min (£)	Max (£)
Low culpability			
Harm category 3	1250	250	2250
Harm Category 2	1500	500	2500
Harm Category 1	1750	750	2750
Medium culpability			
Harm category 3	2000	1000	3000
Harm Category 2	2250	1250	3250
Harm Category 1	2500	1500	3500
High culpability			
Harm category 3	2750	1750	3750
Harm Category 2	3000	2000	4000
Harm Category 1	3250	2250	4250
Very high culpability			
Harm category 3	3500	2500	4500
Harm Category 2	3750	2750	4750
Harm Category 1	4000	3000	5000

Policy on Private Sector Housing Enforcement

Appendix 4 – Imposing Civil Penalties for Electrical Safety Standards Regulations offences

INTRODUCTION

The Electrical Safety Standards in the Private Rented Sector (England) Regulations 2020 came into force on the 1st June 2020 and apply in England to:

- a) All new specified tenancies from the 1st July 2020; and
- b) All existing specified tenancies from 1st April 2021.

Landlords of privately rented accommodation must:

- Ensure national standards for electrical safety are met. These are set out in the appropriate 'wiring regulations', which are published as British Standard 7671;
- Ensure all electrical installations in their rented properties are inspected and tested by a qualified and competent person at least every 5 years;
- Obtain a report from the person conducting the inspection and test which gives the results and sets a date for the next inspection and test;
- Supply a copy of this report to the existing tenant within 28 days of the inspection and test;
- Supply a copy of this report to a new tenant before they occupy the premises;
- Supply a copy of this report to any prospective tenant within 28 days of receiving a request for the report;
- Supply the local housing authority with a copy of this report within 7 days of receiving a written request for a copy;
- Retain a copy of the report to give to the inspector and tester who will undertake the next inspection and test;
- Where the report shows that further investigative or remedial work is necessary, complete this work within 28 days or any shorter period if specified as necessary in the report; and
- Supply written confirmation of the completion of the further investigative or remedial works from the electrician to the tenant and the local housing authority within 28 days of completion of the works.

Landlords must obtain a report giving the results of the test and setting a date for the next inspection. Landlords must comply within 7 days with a written request from Coventry City Council for a copy of the report and must also supply the Council with confirmation of any remedial or further investigative works required by a report.

Coventry City Council may wish to request reports following inspections of properties to ascertain the condition of the electrical installation and confirm the landlord is complying with the Regulations.

Inspectors will use the following classification codes to indicate where a landlord must undertake remedial work. More information can be found in the relevant edition of the Wiring Regulations:

- **Code 1 (C1): Danger present. Risk of injury**
- **Code 2 (C2): Potentially dangerous**
- **Further Investigation (FI): Further investigation required without delay**
- **Code 3 (C3): Improvement recommended.** Further remedial work is **not** required for the report to be deemed satisfactory.

If the report contains a code C1, C2 or FI, then the landlord must ensure that further investigative or remedial work is carried out by a qualified person within 28 days, or less if specified in the report.

The C3 classification code does not indicate remedial work is required, only that improvement is recommended.

A remedial notice must be served where the local housing authority is satisfied on the balance of probabilities that a landlord has not complied with one or more of their duties under the Regulations. The notice must be served within 21 days of the decision that the landlord has not complied with their duties.

If Coventry City Council has reasonable grounds to believe a landlord is in breach of one or more of the duties in the Regulations and the report indicates urgent remedial action is required, the local housing authority may, with the consent of the tenant or tenants, arrange for a qualified person to take the urgent remedial action and recover their costs.

Otherwise, they must serve a remedial notice requiring the landlord to take remedial action within 28 days. Should a landlord not comply with the notice Coventry City Council may, with the tenant's consent, arrange for any remedial action to be taken themselves.

Landlords have rights to make written representation and appeal against remedial action. The Council can recover the costs of taking the action from the landlord.

Under regulation 11 of the Regulations where the Council is satisfied, beyond reasonable doubt, that a private landlord has breached a duty under regulation 3, the authority may impose a financial penalty (or more than one penalty in the event of a continuing failure) in respect of the breach.

Regulation 3 states that:

(1) a private landlord who grants or intends to grant a specified tenancy must-

(a) ensure that the electrical safety standards are met during any period when the residential premises are occupied under a specified tenancy;

(b) ensure every electrical installation in the residential premises is inspected and tested at regular intervals by a qualified person; and

(c) ensure the first inspection and testing is carried out:

(i) before the tenancy commences in relation to a new specified tenancy; or

(ii) by 1st April 2021 in relation to an existing specified tenancy.

(2) For the purposes of sub-paragraph (1)(b) “at regular intervals” means:

(a) at intervals of no more than 5 years; or

(b) where the most recent report under sub-paragraph (3)(a) requires such inspection and testing to be at intervals of less than 5 years, at the intervals specified in that report.

(3) Following the inspection and testing required under sub-paragraphs (1)(b) and (c) a private landlord must:

(a) obtain a report from the person conducting that inspection and test, which gives the results of the inspection and test and the date of the next inspection and test;

(b) supply a copy of that report to each existing tenant of the residential premises within 28 days of the inspection and test;

(c) supply a copy of that report to the local housing authority within 7 days of receiving a request in writing for it from that authority;

(d) retain a copy of that report until the next inspection and test is due and supply a copy to the person carrying out the next inspection and test; and

(e) supply a copy of the most recent report to—

(i) any new tenant of the specified tenancy to which the report relates before that tenant occupies those premises; and

(ii) any prospective tenant within 28 days of receiving a request in writing for it from that prospective tenant.

(4) Where a report under sub-paragraph (3)(a) indicates that a private landlord is or is potentially in breach of the duty under sub-paragraph (1)(a) and the report requires the private landlord to undertake further investigative or remedial work, the private landlord must ensure that further investigative or remedial work is carried out by a qualified person within:

(a) 28 days; or

(b) the period specified in the report if less than 28 days, starting with the date of the inspection and testing.

(5) Where paragraph (4) applies, a private landlord must:

(a) obtain written confirmation from a qualified person that the further investigative or remedial work has been carried out and that:

(i) the electrical safety standards are met; or

(ii) further investigative or remedial work is required;

(b) supply that written confirmation, together with a copy of the report under sub-paragraph (3)(a) which required the further investigative or remedial work to each existing tenant of the residential premises within 28 days of completion of the further investigative or remedial work; and

(c) supply that written confirmation, together with a copy of the report under sub-paragraph (3)(a) which required the further investigative or remedial work to the local housing authority within 28 days of completion of the further investigative or remedial work.

(6) Where further investigative work is carried out in accordance with paragraph (4) and the outcome of that further investigative work is that further investigative or remedial work is required, the private landlord must repeat the steps in paragraphs (4) and (5) in respect of that further investigative or remedial work.

(7) For the purposes of sub-paragraph (3)(e)(ii) a person is a prospective tenant in relation to residential premises if that person:

(a) requests any information about the premises from the prospective landlord for the purpose of deciding whether to rent those premises;

(b) makes a request to view the premises for the purpose of deciding whether to rent those premises; or

(c) makes an offer, whether oral or written, to rent those premises.

A financial penalty may be of such amount as the authority imposing it determines; but must not exceed £30,000.

In determining the Civil Penalty amount, Coventry City Council will have regard to the statutory guidance issued under schedule 9 of the Housing and Planning Act 2016 and also to the developed Civil Penalty Matrix.

The approach to issuing a Civil Penalty is fundamentally made up of two stages, firstly determining the appropriate sanction and secondly (if appropriate) the level of Civil Penalty charged.

When determining the appropriate sanction the Council should satisfy itself that if the case were to be prosecuted there would be a 'realistic prospect of a conviction'. This is currently determined by consulting the Crown Prosecution Service "Code for Crown Prosecutors" which provides two tests: (i) the evidential test and (ii) the public interest test.

Coventry City Council currently consults this code when determining whether to seek a prosecution for offences committed and will continue to do so on a case by case basis in line with this procedure and its enforcement policy.

The maximum penalty that can be set is £30,000. A minimum penalty level has not been set and the appropriate amount of penalty is to be determined by the Local Housing Authority. Only one penalty can be imposed in respect of the same offence.

Statutory guidance has been issued by the Secretary of State under Schedule 9 (12) of the Housing and Planning Act 2016 and Local Authorities must have regard to this when exercising its functions in respect of civil penalties.

Paragraph 3.5 of the statutory guidance states that “**the actual amount levied in any particular case should reflect the severity of the offence, as well as taking account of the landlord’s previous record of offending**”. The same paragraph sets out several factors that should be taken into account to ensure that the civil penalty is set at an appropriate level.

a) **Severity of the offence.**

The more serious the offence, the higher the penalty should be.

b) **Culpability and track record of the offender.**

A higher penalty will be appropriate where the offender has a history of failing to comply with their obligations and/or their actions were deliberate and/or they knew, or ought to have known, that they were in breach of their legal responsibilities. Landlords are running a business and should be expected to be aware of their legal obligations.

c) **The harm (or potential harm) caused to the tenant.**

This is a very important factor when determining the level of penalty. The greater the harm or the potential for harm (this may be as perceived by the tenant), the higher the amount should be when imposing a civil penalty.

d) **Punishment of the offender.**

A civil penalty should not be regarded as an easy or lesser option compared to prosecution. While the penalty should be proportionate and reflect both the severity of the offence and whether there is a pattern of previous offending, it is important that it is set at a high enough level to help ensure that it has a real economic impact on the offender and demonstrate the consequences of not complying with their responsibilities.

e) **Deter the offender from repeating the offence.**

The ultimate goal is to prevent any further offending and help ensure that the landlord fully complies with all of their legal responsibilities in future. The level of the penalty should therefore be set at a high enough level such that it is likely to deter the offender from repeating the offence.

f) **Deter others from committing similar offences.**

While the fact that someone has received a civil penalty will not be in the public domain, it is possible that other landlords in the local area will become aware through informal channels when someone has received a civil penalty. An important part of deterrence is the realisation that (a) the local authority is proactive in levying civil penalties where the need to do so exists and (b) that the level of civil penalty will be set at a high enough level to both punish the offender and deter repeat offending.

g) Remove any financial benefit the offender may have obtained as a result of committing the offence.

The guiding principle here should be to ensure that the offender does not benefit as a result of committing an offence, i.e. it should not be cheaper to offend than to ensure a property is well maintained and properly managed.

The Council will consider the above factors when deciding where, within the relevant band of the Civil Penalties Matrix below, a particular offence and penalty fall. Further, the Council considers factors (d) to (g) above, inclusive, to be primary objectives of financial penalties and will attach particular weight to them when determining the appropriate level of penalty.

FACTORS IN DETERMINING PENALTY LEVELS

Clearly, a single level penalty will not be appropriate in all cases and when assessing the level of penalty to be imposed it is expected that the maximum amount would be reserved for the worst offenders. The actual amount levied should reflect the severity of the case and the Council will have regard to the following:

- Culpability of the landlord – Factors to take into account when determining the culpability include where the offender:
 - Has the intention to cause harm, the highest culpability where an offence is planned;
 - Is reckless as to whether harm is caused, i.e. the offender appreciates at least some harm would be caused but proceeds giving no thought to the consequences, even though the extent of the risk would be obvious to most people;
 - Has knowledge of the specific risks entailed by his actions even though he does not intend to cause the harm that results; and
 - Is negligent in their actions.

Examples of Culpability

The Council will determine the level of culpability by considering the relevant breaches of Regulation 3, for example, in the case of a breach of where a report indicates that a private landlord must undertake further investigative or remedial work, the private landlord fails to do such investigation or remedial work then the culpability will be assessed as high because the landlord was fully aware of the issues having received the report.

For lesser culpable acts the Council will consider an alternative level based on the examples shown in the table below.

High (Deliberate Act)	Intentional breach by landlord or property agent or flagrant disregard for the law, i.e. failure to comply with a correctly served improvement notice
High (Reckless Act)	Actual foresight of, or wilful blindness to, risk of offending but risks nevertheless taken by the landlord or property agent; for example, failure to comply with HMO Management Regulations
Medium (Negligent Act)	Failure of the landlord or property agent to take reasonable care to put in place and enforce proper systems for avoiding commission of the offence; for example, part compliance with a schedule of works, but failure to fully complete all schedule items within notice timescale.
Low (Low or no culpability)	Offence committed with little or no fault on the part of the landlord or property agent; for example, obstruction by tenant to allow contractor access, damage caused by tenants

Harm or Potential for Harm

In determining the level of harm the Council will have regard to:

- the person: i.e. physical injury, damage to health, psychological distress;
- the community; i.e. economic loss, harm to public health; and
- other types of harm; i.e. public concern/feeling over the impact of poor housing condition on the local neighbourhood.

The nature of the harm will depend on the personal characteristics and circumstances of the victim, e.g. tenant.

Where no actual harm has resulted from the offence, the Council will consider the relative danger that persons have been exposed to as a result of the offender's conduct, the likelihood of harm occurring and the gravity of harm that could have resulted.

Factors that indicate a higher degree of harm include:

- Presence of C1 classification issues;
- Multiple victims;
- Especially serious or psychological effect on the victim; and
- Victim is particularly vulnerable.

Examples of Harm Categories

High	Defect(s) giving rise to the offence poses a serious and substantial risk of harm to the occupants and/or visitors; for example, C1 classification codes or multiple C2 classification codes
Medium	Defect(s) giving rise to the offence poses a serious risk of harm to the occupants and/or visitors; for example, isolated or minimal numbers of C2 classification codes.
Low	Defect(s) giving rise to the offence poses a risk of harm to the occupants and/or visitors; for example, isolated C2, C3 or FI classification codes.

Punishment of the Offender

The Council will also have regard to the following:

- A Civil Penalty should not be regarded as an easy or lesser option compared to prosecution;
- The penalty should be proportionate and reflect the severity of the offence; and
- The penalty should be set high enough to help ensure that it has a real economic impact on the offender and demonstrate the consequences of not complying with their responsibilities.

Deter the offender from repeating the offence

- The ultimate goal is to prevent further offending and help ensure the landlord fully complies with all their legal responsibilities in future.
- The level of penalty should be set at a high enough level to deter repeat offending.

Deter others from committing similar offences

- An important part of deterrence is the realisation that the Council is proactive in levying Civil Penalties where the need exists and that the level of Civil Penalty will be set high enough to punish the offender and deter repeat offending.
- Remove any financial benefit the offender may have obtained as a result of committing the offence.
- Ensure that the offender does not benefit as a result of committing an offence i.e. it should not be cheaper to offend than to ensure a property is well maintained and managed.

DETERMINING THE AMOUNT OF CIVIL PENALTY

In determining the level of a civil penalty, officers will have regard to the matrix set out below, which has been developed taking into the factors set out in the statutory guidance provided by Government.

The matrix is intended to provide an indicative minimum 'tariff' under the various offence categories, with the final level of the civil penalty adjusted in each case, and generally within the relevant band, to take into account aggravating and mitigating factors.

The Council may, exceptionally, increase the penalty above the band maximum or, again exceptionally, decrease it below the minimum 'tariff'. In order to meet the objectives of this policy and of financial penalties in particular, however, including the need for transparency and consistency in the use of such penalties, the Council will exercise its discretion to increase or decrease a penalty beyond band limits in exceptional circumstances only (excluding any Discounts as set out below). The Council will consider on a case-by-case basis, in light of the information with which it is provided, whether any such circumstances exist.

The table below sets out the interrelation between harm and culpability as an initial determinant of the Civil Penalty banding.

Band	Severity	Band Width (£)
1	Low Culpability/Low Harm	£0 to £4,999
2	Medium Culpability/Low Harm	£5,000 to £9,999
3	Low Culpability/ Medium Harm or High Culpability/ Low Harm	£10,000 to £14,999
4	Low Culpability/High Harm or Medium Culpability/ Medium Harm	£15,000 to £19,999
5	Medium Culpability/High Harm or High Culpability/Medium Harm	£20,000 to £24,999
6	High Culpability/High Harm	£25,000 to £30,000

Aggravating Factors

The starting point for the penalty may be increased by 3.33% for each aggravating factor up to a maximum of 15% of the initial penalty level.

In order to determine the final penalty the Council will consider all aggravating factors relevant to the case.

Below is a list which will be considered as part of the determination. This is not an exhaustive list and other factors may be considered depending on the circumstances of each case:

- Previous convictions having regard to the offence to which applies and time elapsed since the offence;
- Motivated by financial gain;
- Lack of co-operation/communication or obstruction of the investigation;
- Deliberate concealment of the activity/evidence;
- Offending over an extended period of time i.e. more than 6 months
- Negligence;

- Number of items of non-compliance – greater the number the greater the potential aggravating factor;
- Record of non-compliance;
- Record of letting substandard accommodation;
- Record of poor management/ inadequate management provision;
- Lack of a tenancy agreement/rent paid in cash; and
- Already a member of an accreditation scheme or letting standard

Mitigating Factors

The starting point for the penalty may be decreased by 3% for each mitigating factor to a maximum 15% of the initial penalty level.

In order to determine the final penalty the Council will consider all mitigating factors relevant to the case.

Below is a list which will be considered as part of the determination. This is not an exhaustive list and other factors may be considered depending on the circumstances of each case:

- Co-operation with the investigation;
- Voluntary steps taken to address issues e.g. submits a licence application;
- Willingness to undertake training;
- Willingness to join Coventry City Council's landlord accreditation scheme;
- Evidence of health reasons preventing reasonable compliance – mental health, unforeseen health issues, emergency health concerns;
- No previous convictions;
- Vulnerable individual(s) where vulnerability is linked to the commission of the offence;
- Good character and/or exemplary conduct; and
- Early admission of guilt i.e. within 1 month.

When considering aggravating and mitigating factors the Civil Penalty imposed must remain proportionate to the offence.

Reference will be made to Magistrates Court Sentencing Council guidelines when considering relevant aggravating and mitigating factors.

An offender will be assumed to be able to pay a penalty up to the maximum amount unless they can demonstrate otherwise.

PROCESS

The procedure for imposing a civil penalty is set out in Schedule 2 of The Electrical Safety Standards in the Private Rented Sector (England) Regulations 2020 and summarised below.

Coventry City Council must give the person a notice of its proposal ('notice of intent') to impose a civil penalty. The notice of intent must set out:

- the amount of the proposed financial penalty;
- the reasons for proposing to impose the penalty; and
- information about the right of the landlord to make representations.

The notice of intent must be served before the end of the period of 6 months beginning with the first day on which the authority is satisfied, in accordance with regulation 11, that the private landlord is in breach (“the relevant day”), subject to sub-paragraph (3).

(3) If the breach continues beyond the end of the relevant day, the notice of intent may be served:

- (a) at any time when the breach is continuing; or
- (b) within the period of 6 months beginning with the last day on which the breach occurs.

The private landlord may, within the period of 28 days beginning with the day after that on which the notice of intent was served, make written representations to the local housing authority about the proposal to impose a financial penalty on the private landlord.

After the end of the period for representations, the local housing authority must decide whether to impose a penalty and, if so, the amount of the penalty. If the authority decides to impose a financial penalty, it must give the person a notice (‘final notice’) requiring that the penalty is paid within 28 days.

The final notice must set out:

- the amount of the financial penalty;
- the reasons for imposing the penalty;
- information about how to pay the penalty;
- the period for payment of the penalty (28 days);
- information about rights of appeal; and
- the consequences of failure to comply with the notice.

The local housing authority may at any time:

- withdraw a notice of intent or final notice; or
- reduce the amount specified in a notice of intent or final notice.

On receipt of a final notice imposing a financial penalty a landlord can appeal to the First Tier Tribunal against the decision to impose a penalty and/or the amount of the penalty. The appeal must be made within 28 days of the date the final notice was issued. The final notice is suspended until the appeal is determined or withdrawn.

If the private landlord does not pay the whole or any part of a financial penalty which, the private landlord is liable to pay the Council may recover the penalty or part on the order of the county court as if it were payable under an order of that court.

Policy on Private Sector Housing Enforcement

Appendix 5 – Imposing Civil Penalties for Minimum Energy Efficiency Standards (MEES) and Energy Performance Certificate offences

Introduction

The Minimum Energy Efficiency Standards (MEES) came into force in April 2018 and have been amended twice since that time. This policy document reflects the most recent up to date amendments made on the 15th March 2019.

The Energy Efficiency (Private Rented Property) (England and Wales) Regulations 2015, as amended are referred to in this document as “the Regulations”.

The Regulations are designed to tackle the least energy-efficient properties in England and Wales – those rated F or G on their Energy Performance Certificate (EPC). The Regulations establish a minimum standard of EPC band E for both domestic and non-domestic private rented property, affecting new tenancies and renewals since 1 April 2018.

The amended Regulations introduced a new self-funding element for domestic landlords, which takes effect if landlords are unable to access third-party funding to improve any EPC F or G properties, they let to EPC E.

The Regulations set out the minimum level of energy efficiency for private rented property in England and Wales. In relation to the domestic private rented sector (PRS) the minimum level is EPC E.

Landlords who are installing relevant energy efficiency improvements may, of course, aim above and beyond this current requirement if they wish.

The minimum standard will apply to any domestic private rented property which is legally required to have an EPC, and which is let on certain tenancy types. Where these two conditions are met the landlord must ensure that the standard is met (or exceeded).

Landlords of domestic property for which an EPC is not a legal requirement are not bound by the prohibition on letting sub-standard property.

The minimum level of energy efficiency means that, subject to certain requirements and exemptions:

- a) since 1 April 2018, landlords of relevant domestic private rented properties must not grant a tenancy to new or existing tenants if their property has an EPC rating of F or G (as shown on a valid EPC for the property); and
- b) from 1 April 2020, landlords must not continue letting a relevant domestic property which is already let if that property has an EPC rating F or G (as shown on a valid EPC for the property).

Where a property is sub-standard, landlords must normally make energy efficiency improvements which raise the EPC rate to minimum E before they let the property.

In certain circumstances, landlords may be able to claim an exemption from this prohibition on letting sub-standard property where a valid exemption applies, landlords must register the exemption on the PRS Exemptions Register.

The Regulations cross refer to other Regulations, including the Energy Performance of Buildings (Certificates and Inspections) (England and Wales) Regulations 2007, the Building Regulations 2010 and the Energy Performance of Buildings (England and Wales) Regulations 2012. Readers wishing to consult these related Regulations should ensure they look at the most up to date versions at www.legislation.gov.uk

Enforcement of the Minimum Level of Energy Efficiency

Local authorities are responsible for enforcing compliance with the domestic minimum level of energy efficiency. They may check whether a property meets the minimum level of energy efficiency and may issue a compliance notice requesting information where it appears to them that a property has been let in breach of the Regulations (or an invalid exemption has been registered in respect of it).

Where a local authority is satisfied that a property has been let in breach of the Regulations it may serve a notice on the landlord imposing financial penalties.

The authority may also publish details of the breach on the PRS Exemptions Register.

The landlord may ask the local authority to review the penalty notice and, if the penalty is upheld on review, the landlord may then appeal the penalty notice to the First-tier Tribunal.

A local authority may also serve a penalty notice for the lodging of false information on the PRS Exemptions Register.

The Council may check for different forms of non-compliance with the Regulations including:

- since 1 April 2018 whether the property is sub-standard and let in breach of regulation 23 (which may include continuing to let the property after 1 April 2020); and
- where the landlord has registered any false or misleading information on the PRS Exemptions Register, or has failed to comply with a compliance notice.

Since 1 April 2018, where the Council believes that a landlord may be in breach of the prohibition on letting a sub-standard property, or a landlord has been in breach of the prohibition at any time in the past 12 months, the Council may serve a compliance notice that requests information from that landlord which will help them to decide whether that landlord has in fact breached the prohibition.

The fact that the Council may serve a compliance notice on a landlord up to 12 months after the suspected breach means that a person may be served with a compliance notice after they have ceased to be the landlord of the property.

It is good practice, therefore, for landlords to retain any records and documents relating to a let property that may be used to demonstrate compliance with the Regulations.

Any notice that is served under the Regulations must be in writing and may be sent in hard copy or electronically. Where a notice is served on a corporate body it may be given to the secretary or clerk of that body if a suitable named individual cannot be identified. Where a notice is served on a partnership, it may be addressed to any partner, or to a person who has control or management of the partnership business.

A compliance notice served by the Council may request either the original or copies of the following information:

- the EPC that was valid for the time when the property was let;
- any other EPC for the property in the landlord's possession;
- the current tenancy agreement used for letting the property;
- any Green Deal Advice Report in relation to the property; and
- any other relevant document that the Council requires in order to carry out its compliance and enforcement functions.

The compliance notice may also require the landlord to register copies of the requested information on the PRS Exemptions Register.

The compliance notice will specify:

- the name and address of the person that a landlord must send the requested information to; and
- the date by which the requested information must be supplied (the notice must give the landlord at least one calendar month to comply).

The landlord must comply with the compliance notice by sending the requested information to the Council and allow copies of any original documents to be taken.

Failure to provide documents or information requested by a compliance notice, or failure to register information on the PRS Exemptions Register as required by a compliance notice, may result in a penalty notice being served.

The Council may withdraw or amend the compliance notice at any time in writing, for example where new information comes to light.

The Council may also use the documents provided by the landlord or any other information it holds to decide whether the landlord is in breach of the Regulations.

Where the Council decides to impose a financial penalty, they have the discretion to decide on the amount of the penalty, up to maximum limits set by the Regulations.

The maximum penalties are as follows:

- a) Where the landlord has let a sub-standard property in breach of the Regulations for a period of less than 3 months, the Local Authority may impose a financial penalty of **up to £2,000** and may impose the publication penalty;

- b) Where the landlord has let a sub-standard property in breach of the Regulations for 3 months or more, the Local Authority may impose a financial penalty of **up to £4,000** and may impose the publication penalty;
- c) Where the landlord has registered false or misleading information on the PRS Exemptions Register, the Local Authority may impose a financial penalty of **up to £1,000** and may impose the publication penalty; and
- d) Where the landlord has failed to comply with the compliance notice, the Local Authority may impose a financial penalty of **up to £2,000** and may impose the publication penalty.

A local authority may not impose a financial penalty under both paragraphs (a) and (b) above in relation to the same breach of the Regulations. But they may impose a financial penalty under either paragraph (a) or paragraph (b), together with financial penalties under paragraphs (c) and (d), in relation to the same breach. Where penalties are imposed under more than one of these paragraphs, the total amount of the financial penalty may **not be more than £5,000**.

It is important to note that this maximum amount of £5,000 applies per property, and per breach of the Regulation. Given this, it means that, if after having been previously fined up to £5,000 for having failed to satisfy the requirements of the Regulations, a landlord proceeds to unlawfully let a sub-standard property on a new tenancy; the Council may again levy financial penalties up to £5,000 in relation to that new tenancy.

Table Two:

Infringement	Penalty (less than three months in breach)	Penalty (three months or more in breach)
Renting out a non-compliant property	Up to £2,000, and/or Publication penalty.	Up to £4,000, and/or Publication penalty.
Providing false or misleading information on the PRS Exemptions Register	Up to £1,000, and/or Publication penalty	
Failing to comply with a compliance notice	Up to £2,000, and/or Publication penalty	

It is important to note that the maximum penalty amounts apply per property, and per breach of the Regulations.

Publication penalty (regulation 39)

A publication penalty means that the Council will publish some details of the landlord's breach on a publicly accessible part of the PRS Exemptions Register.

The Council can decide how long to leave the information on the Register, but it will be available for view by the public for at least 12 months.

The information that the Council may publish is:

- the landlord's name (except where the landlord is an individual);
- details of the breach; and
- the address of the property in relation to which the breach occurred; and the amount of any financial penalty imposed.

The Council may decide how much of this information to publish. However, the authority may not place this information on the PRS Exemptions Register while the penalty notice could be, or is being reviewed by the Council, or while their decision to uphold the penalty notice could be, or is being, appealed

Circumstances in which a penalty notice may be served (regulation 38)

From 1 April 2018 onwards, the Council may serve a penalty notice (relating to a financial penalty, a publication penalty or both) on the landlord where they are satisfied that the landlord is, or has been in the last 18 months:

- in breach of the prohibition on letting sub-standard property (which may include continuing to let the property after 1 April 2020) (see section 1.2.1);
- in breach of the requirement to comply with a compliance notice; or
- has uploaded false or misleading information to the Exemptions Register.

The fact that an enforcement authority may serve a penalty notice on a landlord up to 18 months after the suspected breach means that a person may be served with a penalty notice after they have ceased to be the landlord of a property.

The penalty notice may include a financial penalty, a publication penalty or both. The penalty notice will:

- explain which of the provisions of the Regulations the Council believes the landlord has breached;
- give details of the breach;
- tell the landlord whether they must take any action to remedy the breach and, if so, the date within which this action must be taken (the date must be at least a month after the penalty notice is issued);
- explain whether a financial penalty is imposed and if so, how much and, where applicable, how it has been calculated;
- explain whether a publication penalty has been imposed;
- where a financial penalty is imposed, tell the landlord the date by which payment must be made, the name and address of the person to whom it must be paid and the method of payment (the date must be at least a month after the penalty notice is issued);

- explain the review and appeals processes, including the name and address of the person to whom a review request must be sent, and the date by which the request must be sent; and
- explain that if the landlord does not pay any financial penalty within the specified period, the Council may bring court proceedings to recover the money from the landlord.

A further penalty notice may be issued if the action required in the penalty notice is not taken in the time specified.

As noted above, when the Council issues a penalty notice which carries a right of appeal, they must tell the landlord about that right of appeal.

Circumstances in which a penalty notice may be reviewed or withdrawn (regulation 42)

The Council may decide to review its decision to serve a penalty notice, for example when new information comes to light.

A landlord also has the right to ask the Council to review its decision to serve a penalty notice. This request must be made in writing.

The penalty notice must tell the landlord how long they have to make this request, and who it must be sent to.

When the Council receives the request, it must consider everything the landlord has said in the request and decide whether or not to withdraw the penalty notice.

The Council must withdraw the penalty notice if:

- they are satisfied that the landlord has not committed the breach set out in the penalty notice;
- although they still believe the landlord committed the breach, they are satisfied that the landlord took all reasonable steps, and exercised all due diligence to avoid committing the breach; or
- they decide that because of the circumstances of the landlord's case, it was not appropriate for the penalty notice to be served.

If the Council does not decide to withdraw the penalty notice, it might decide to waive or reduce the penalty, allow the landlord additional time to pay, or modify the publication penalty, and must explain the appeals process and how financial penalties can be recovered.

Whatever they decide, the Council must inform the landlord of their decision in writing, and, should do so at the earliest opportunity.

Recovery of financial penalties (regulation 45)

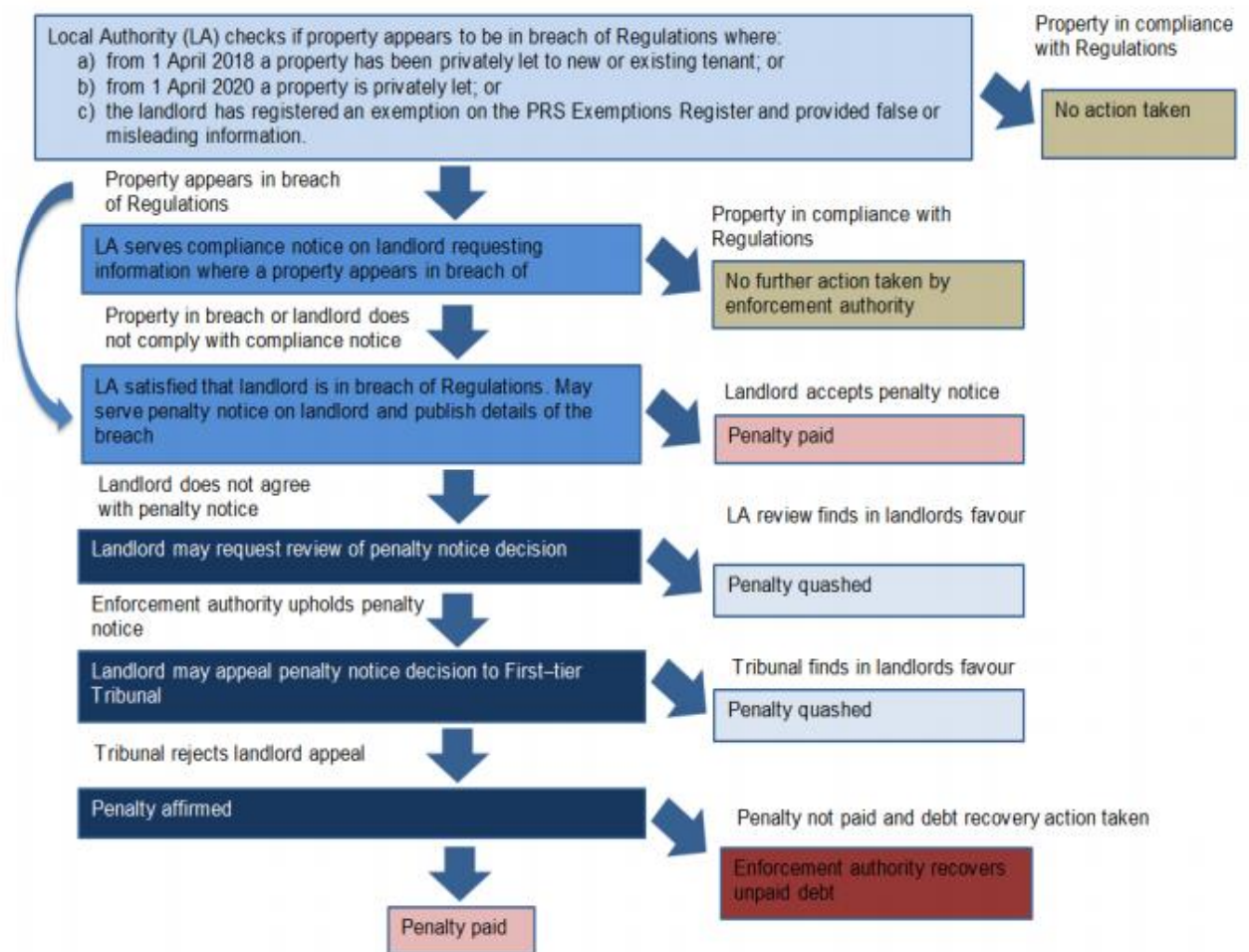
If a landlord does not pay a financial penalty imposed on them, the Council may take the landlord to court to recover the money. In proceedings for the recovery of a financial penalty a certificate signed by or on behalf of the person with responsibility for the financial affairs of the Council and stating that payment of the financial penalty

was or was not received by a given date, will be accepted as evidence of the landlord's non-compliance with the penalty notice.

The Council may not take the landlord to court to recover the money:

- a) during the period in which the landlord could ask the Council to review their decision to serve the penalty notice, or while they are reviewing their decision to serve the penalty notice; or
- b) during the period in which the landlord could appeal to the First-tier Tribunal, or while there is an ongoing appeal to the First-tier Tribunal, against the penalty notice.

The Domestic Private Rented Sector Minimum Standard



Appeals to the First-tier Tribunal (General Regulatory Chamber) (regulations 43 and 44)

The First-tier Tribunal (General Regulatory Chamber) is administered by Her Majesty's Courts and Tribunals Service and is the home for a range of rights of appeal.

Where a landlord asks the Council to review a decision to serve a penalty notice and, on review, they decide to uphold the penalty notice, the landlord may then appeal to the First-tier Tribunal against that decision if they think that:

- the penalty notice was based on an error of fact or an error of law;
- the penalty notice does not comply with a requirement imposed by the Regulations; or
- it was inappropriate to serve a penalty notice on them in the particular circumstances.

If a landlord does appeal, the penalty notice will not have effect while the appeal is ongoing. A landlord may also wish to seek legal advice as part of considering or making an appeal, if they have not already done so.

Enforcement of the Energy Performance of Buildings Regulations 2012

Under the Energy Performance of Buildings (England and Wales) Regulations 2012 landlords and businesses are required to make energy efficiency of buildings transparent by using an energy performance certificate (EPC), to show the energy rating of a building, when sold or rented out and recommendations on how to improve energy efficiency.

Failure to provide an EPC when required means a person may be liable to a civil penalty charge notice and enforcement action may still be taken up to six months after any failure has been corrected.

The Council has the power to ask the seller or landlord to provide them with a copy of the EPC for inspection. If requested, a copy of the EPC must be provided within seven days or the person to whom the request was made may be liable to a penalty charge notice for failing to comply. A copy of an EPC can be requested at any time up to six months after the last day for compliance with the duty to make it available.

A fixed penalty charge of £200 may be issued for failure to comply in the following circumstances:

- on sale or rent the seller or landlord failed to make a valid EPC available free of charge to the prospective buyer or tenant at the earliest opportunity or to the person who ultimately becomes the buyer or tenant;
- on marketing the seller or landlord did not commission an EPC before the building was put on the market or the person acting on their behalf (i.e. estate or letting agent) did not ensure that an EPC was commissioned for the building;
- the seller or landlord or a person acting on their behalf did not secure an EPC using all reasonable efforts within seven days of the building being put on the market. An EPC must be obtained 21 days after the initial seven day period; and
- the seller or landlord or a person acting on their behalf did not include the energy performance indicator in any advertisement of the sale or rental in commercial media.

If a penalty charge notice is issued but you believe it should not have been issued you can request a review from the local authority. If, after review, you are not satisfied with the outcome of the review you may within 28 days, beginning on the day after the notice is received from the local authority confirming the penalty, appeal to the county court.

A person with an interest in, or in occupation of, a building, must cooperate with any seller or landlord to enable them to comply with requirement to make an EPC available. They must also allow access to the building to any energy assessor appointed by the seller or landlord. The penalty for obstructing an enforcement officer or for imitating an enforcement officer is a fine not exceeding level 5 on the standard scale, upon summary conviction.



FIT AND PROPER PERSON DETERMINATION POLICY FOR CARAVAN SITE LICENSING

DETERMINATION POLICY

Introduction

Following a Government review of the Mobile Homes Act, 2013, the Government introduced a new regime under the Caravan Sites and Control of Development Act 1960 called the Fit and Proper Person Test (F&PP test). The regime sits within The Mobile Homes (Requirement for Manager of Site to be Fit and Proper Person) (England) Regulations, 2020. All protected residential sites which are operated on a commercial basis must have demonstrated that they are operated/managed by a F&PP.

The Mobile Homes (Requirement for Manager of Site to be Fit and Proper Person) (England) Regulations 2020, require the manager of a site to be a Fit and Proper Person (“the Regulations”). Local authorities are accordingly required to introduce a fit and proper person test for mobile home site owners, or the person appointed to manage the site, unless they are eligible for an exemption under the Regulations¹.

A local authority must be satisfied that the site owner “*is a fit and proper person to manage the site*” or, if the owner does not manage the site, “*that a person appointed*” to do so by the site owner “*is a fit and proper person to do so*” or has, with the site owner’s consent, “*appointed a person to manage the site.*”

Where a site owner or their manager fails the fit and proper person test, and they are unable to identify and appoint a suitable alternative manager, who must pass the fit and proper person assessment, the local authority can instead appoint a person to manage the site, but only with the consent of the site owner.

Principally, the fit and proper person test applies to a “relevant protected site”. A relevant protected site is a site, which requires a licence and which is not solely for

¹ *i.e. it is a non-commercial, family occupied site under Regulation 3

holiday purposes or is otherwise not capable of being used all year round. The fit and proper person requirement will ensure that site owners, or their managers, have integrity and follow best practice. Additionally, it provides the safeguard that such individuals will not pose a risk to the welfare or safety of persons occupying mobile homes on the site i.e. park home owners.

The Evidence

When conducting the fit and proper person assessment, Coventry City Council (the Council) must consider the following points relevant to the application:

1. **Is the individual able to conduct effective management of the site.** This includes, but is not limited to, securing compliance with the site licence and the long-term maintenance of the site. It follows that, the Council must have regard to:
 - (a) whether the person has a sufficient level of competence to manage the site;
 - (b) the management structure and funding arrangements for the site;
 - or
 - (c) the proposed management structure and funding arrangements.

Competence to manage the site

This includes reviewing the competency of the appointed individual. The individual must have sufficient experience in site management, or have received sufficient training, and be fully aware of the relevant law as well as health and safety requirements.

The management structure and funding arrangements for the site

The Council will consider whether relevant management structures are in place and whether they are adequate to ensure effective management of the site. The Council may want to ensure that the applicant has a robust management plan, this should also be reviewed to ensure it addresses the following issues: the pitch fee payment, proximity of the manager to the site, manager's contact details for residents (including out of office and emergency contact details), the complaints procedure, maintenance, staffing, and refuse removal.

It is advisable that the site is managed by an applicant based in the UK and a management structure would be unlikely to be suitable if the applicant is an individual, or a company (including its directors), which does not reside or have a permanent UK address. This is because there may complex issues as a result of this, such as needing the court's permission to serve a claim in a foreign country. Should this happen, counsel would be able to assist. The applicant's interest in the land will also have an important impact, as would their financial standing, management structures and competence, all of which could contribute to the overall assessment of their suitability to manage the site effectively.

The proposed management structure and funding arrangements in place for managing the site

The Council must consider whether the applicant has sufficient funds (or has access to sufficient funds) to manage the site and comply with licence obligations. Evidence of these funds should be readily available.

Another consideration is if funding is through a third party (including an associated company), the local authority should be wary if this is not disclosed as this will impact on the Council's ability to deem whether the application is financially viable.

2. **Personal information relating to the applicant concerned.** This would include a criminal record check and should include evidence that the applicant:
- (a) has not committed any offence involving fraud or other dishonesty, violence, firearms or drugs or any offence listed in Schedule 3 to the Sexual Offences Act 2003 (offences attracting notification requirements);
 - (b) has not contravened any provision of the law relating to housing, caravan sites, mobile homes, public health, planning or environmental health or of landlord and tenant law;
 - (c) has not contravened any provision of the Equality Act 2010 in, or in connection with, the carrying on of any business;
 - (d) has not harassed any person in, or in connection with, the carrying on of any business;
 - (e) is not or has not been within the past 10 years, personally insolvent;
 - (f) is not or has not been within the past 10 years, disqualified from acting as a company director;
 - (g) has the right to work in the United Kingdom; and
 - (h) is a member of any redress scheme enabling complaints to be dealt with in connection with the management of the site (when this is in place).

The Council has a duty to investigate any conduct which could amount to harassment and any evidence obtained should be reviewed to determine whether it is sufficient to be used to prosecute a site owner. The Council may also rely on convictions by the courts as evidence of harassing behaviour which would reduce the risk of the local authority being successfully challenged on any refusal to approve an applicant on this basis.

The Council may have records of previous harassment complaints made against a site owner or their manager. Even if no action was taken on these complaints these will be taken into consideration in the fit and proper person determination. These complaints may identify further potential risks and can also provide an indication of potential underlying problems with the management of the site or the site owner's lack of experience/skills in dealing with customers. The Council may also wish to address any underlying issues by attaching conditions to the individual's entry on the register.

3. Upon rejection of a person's application by any other local authority this should be centrally recorded and include the details of the person involved and the reasons for the rejection.

Items to take into consideration

4. "The applicant" is defined at paragraph 2 of the Regulations as "the person who makes an application under regulation 6".
5. The "relevant person" is also defined at paragraph 2 of the Regulations to mean "the subject of the fit and proper person assessment under Regulation 7".
6. The conduct of any person associated or formerly associated with the relevant person (whether on a personal, work or other basis) is also an important factor to be considered in the fit and proper person assessment.
7. Site owners may be required to provide details of any current or former associates of the relevant person in the application form. Those associates will not include other current joint owners as that information would have already needed to have been provided in their own application forms.
8. It is not routinely required to provide information of all current or past associates of the site owner. However, prior to making any final decisions, the Council may consider the conduct of past and current associates relevant to that individual's application. The site owner can be asked to provide additional information during the application process.
9. The Council is required to establish whether an individual is considered to be an associate of the relevant person and then whether their conduct is relevant to the application. A relevant associate could be defined as any individual who may have played a part, directly or indirectly, in a decision or action, which has had an impact on residents' rights, or the quiet enjoyment of their homes.
10. The Regulations are drafted widely giving the opportunity for the Council to take into consideration other relevant matters. However, the Council is cognisant that poor management practices do not affect a person's conduct, unless they are also a breach of the criminal or civil law. A person cannot be deemed unfit due to conduct, simply because of poor management, although that factor is highly relevant to determining any question of suitability or competence. However, all conduct is relevant in relation to the person's fitness to hold a licence and/or manage the particular mobile home site.
11. The Council is able to decide the specific matters they deem relevant to the fit and proper person application. These matters could be in relation to current or previous issues, or events, that have occurred in relation to the park site or any other park site owned or managed by the site owner or site manager in another local authority area. Additionally, the site owner's conduct regarding other business, outside of the park homes sector, can also have implications on the financial and management arrangements of the site in question. Any matters which the Council believes to be of relevance to the application should primarily focus on the relevant person's conduct, competence and their suitability to manage the site.

12. The Council may request evidence to support any additional matters that they require to be taken into consideration for the application. This is to mitigate any risks should they face being challenged at a tribunal because of their final decision. The evidence could include previous tribunal and court decisions, documents or records from Companies House, or other public bodies or financial institutions. Allegations which have not been investigated or documented may be difficult to use as evidence to support the authority's decision.

Applications

The Regulations use various terms in the application process and these are outlined below:

As mentioned earlier “relevant person” is defined in paragraph 2 of the Regulations and is “the subject of the fit and proper person assessment under Regulation 7”. Please note that this could be the site owner or person appointed to manage the site by the site owner.

“Relevant officer” is defined in paragraph 1 of Schedule 2 of the Regulations, where the applicant is a company, a relevant officer will be a director or other officer of the company; or, where the applicant is a partnership, a partner; or, where the applicant is a body corporate, a member of the management committee of that body.

“Required Information” is defined in paragraph 14 of Schedule 2 of the Regulations (even though the Regulations incorrectly state that this information is contained in paragraph 13) as: the person's name and business contact details; details of the person's role or proposed role in relation to the management of the site; where the person has not yet been appointed, the address, telephone number and email address (if any) at which the person may be contacted in respect of the application; details of each relevant protected site (other than that to which the registration application relates) — for which the person holds a licence issued under section 3 of the Caravan Sites and Control of Development Act 1960, or in which the person has a legal estate or equitable interest, or which the person manages.

The application for inclusion in the fit and proper register, must therefore include the following:

The applicant and site details required

13. Details of the site and the applicant:

- (1) the applicant's name and business contact details;
- (2) where the applicant is not an individual, the following information in relation to the individual completing the application on behalf of the applicant and each relevant officer:
 - (i) the person's name;
 - (ii) details of the person's role (if any) in relation to the management of the site.
- (3) the name and address of the site;
- (4) evidence of the applicant's legal estate or equitable interest in the site;

- (5) confirmation that the applicant is the occupier within the meaning of section 1 of the Caravan Sites and Control of Development Act 1960; and
- (6) The name and business contact details of any other person that has a legal estate or equitable interest in the site.

14. The name and address of each other relevant protected sites:

- (1) for which the applicant holds a licence issued under section 3 of the Caravan Sites and Control of Development Act 1960;
- (2) in which the applicant has a legal estate or equitable interest; and
- (3) that the applicant manages.

15. The applicant must clearly specify whether their application is made in respect of either the applicant, or site owner, or the person that the applicant or site owner has appointed to manage the site.

Information relating to the site manager

16. In circumstances where a “site manager” has been appointed to manage a site more information is needed. The person who is applying for the site manager to be registered as a fit and proper person (the relevant person) must provide the following information: the site manager’s name and details of that person’s role (if any) in relation to the management of the site.

If the site manager has appointed or intends to appoint a further individual (“A”), ‘Required Information’ would also be needed from A. And where A is not a relevant officer of the site manager, the relevant officer to whom A is accountable for the day-to-day management of the site, should be the one to provide the Required Information.

Additional information when the applicant is the relevant person and an individual

17. When the applicant is the relevant person, and is an individual, and the applicant has appointed, or intends to appoint, someone else (“B”) to be responsible for the day-to-day management of the site, ‘Required Information’ would be needed from B. If B is not an individual but is, instead, for example, a company, and B has appointed an individual (“C”) to do the day-to-day management, ‘Required Information’ would be needed from C. Where C is not a relevant officer of a company, the relevant officer to whom C is accountable for the day-to-day management of the site would also need to provide the Required Information.

Additional information where applicant is relevant person and not an individual

18. When the applicant is the relevant person but is not an individual and the applicant has appointed or intends to appoint someone else (“B”) to be responsible for the day-to-day management of the site, Required Information would be needed from this person. If B is not a relevant officer of the applicant, the person to whom B is accountable for the day-to-day management of the site (“C”) would also need to provide the Required Information. Where B itself is not an individual, the individual (“D”) that B has appointed or intends to appoint to be responsible for the day-to-day management of the site would also need to

provide the Required Information. Where D is not a relevant officer of B, the relevant officer to whom D is accountable for the day-to-day management of the site would also need to provide the Required Information.

19. It can be seen from the above that the Regulations prohibit the operation of a relevant protected site unless the site owner or its site manager (whatever the management structure might be) has been assessed by the local authority as a fit and proper person to do so. This has been included to ensure that consistent standards are applied to companies and other organisations that are not individuals.

Criminal record certificate/s

20. Criminal Records Certificates must be issued under section 113A (1) of the Police Act 1997 and will be required where: (a) the relevant person is an individual and (b) for each individual in relation to whom the applicant is required to provide information for example, a site manager or individuals A, B, C or D as outlined above.

21. With reference to the above law, the Criminal record may be either basic or enhanced, the Council has determined that the certificate can be basic.

22. The certificate must have been issued no more than six months before the date of the application. It is incumbent upon the site owner to ensure that any certificates provided meet this requirement.

Declaration

A declaration made and signed by the “appropriate person”, which means:

- (a) where the applicant is a company, a director or other officer of the company;
- (b) where the applicant is a partnership, one of the partners;
- (c) where the applicant is a body corporate and the conduct of the management of the body is vested in its members, a member;
- (d) where the applicant is not a body falling within (a) to (c) above, a member of the management committee;
- (e) where the applicant is an individual, that individual.

23. Where the applicant is not the relevant person, the declaration must confirm that the applicant has made all reasonable enquires into the matters mentioned in paragraph 9 of the Regulations and considerations relevant to the fit and proper person assessment as set out below.

24. The declaration should also state that the information provided in the application is correct and complete to the best of the applicant’s knowledge and belief.

Considerations relevant to fit and proper person assessment

25. Proper management of the site includes, but is not limited to, securing compliance with the site licence and the long-term maintenance of the site.

26. To be able to secure the proper management of the site, the Council must (amongst other things) have regard to whether the relevant person has a sufficient level of competence to manage the site and the management structure or proposed management structure and funding arrangements.

Decisions, notification and rights of appeal

27. The Council must make a decision on the application in a timely and practicable manner and either:

- (a) where the decision is to grant the application unconditionally and include the relevant person on the register for 5 years, serve a final decision notice on the applicant; or
- (b) otherwise, serve a preliminary decision notice on the applicant.

28. On receipt of an application the Council may:

- (a) grant the application unconditionally;
- (b) grant the application subject to conditions; or
- (c) reject the application.

Granting the application unconditionally

29. Where the Council is satisfied that the applicant meets the fit and proper person test unconditionally, they must include the applicant on the register for 5 years. The authority must issue a final decision notice to the applicant to inform them of its decision.

30. The final decision notice must clearly state:

- (a) the date the final decision notice is served;
- (b) the final decision;
- (c) the reasons for the decision;
- (d) when the decision is to take effect;
- (e) information about:
 - (i) The right of appeal to the First Tier Tribunal; and
 - (ii) The period within which an appeal may be made.

To include the applicant on the register subject to certain condition(s)

31. In some circumstances, the Council can specify that the individual for the fit and proper person test will only be successful if certain conditions are met. If these conditions are satisfied, the Council can grant an application subject to those condition(s). An application can also be granted for less than 5 years.

32. It may be the case that the Council decides to include the person on a register subject to condition(s), if it would only be satisfied that the person would meet the fit and proper requirement if the condition(s) were complied with. An applicant will be able to appeal against the decision to attach (or vary) any condition to an entry on the register.

33. Conditions will be clearly stated for the applicant's understanding and this will also allow for the Council to ensure that they are enforceable.

An example of the requirements are included in the Table 1 below.

Table 1

Specific	The specific condition/s a site owner is being requested to address.
Measurable	The conditions required and the outcome(s) expected.
Achievable	The applicant should be reasonably expected to be able to achieve the condition. For example, it may not be reasonable to expect a site owner of one small site to have the same resources to introduce the same procedures as a medium sized company.
Realistic	The applicant should have a clear understanding of how the required outcome can be reached and that there are no circumstances or factors which would make the achievement of the outcome impossible or unlikely.
Timebound	A clear timescale in which the task/action must be completed.

What can a condition relate to?

34. The fit and proper person test is aimed at ensuring that the person managing the site is competent and the conditions should relate directly to the person's ability to secure the proper management of the site.
35. Where a person has contravened legislation, or committed offences set out in paragraph 2 above, it is not recommended that conditions are set in relation to those matters. This is because such a condition would be unlikely to meet the tests set out above in paragraph 33. For example, if a person has committed fraud or violence, that specific incident cannot be reversed by requiring the person to perform a specific task.
36. Where the person has committed those listed offences or contravened legislation, these breaches should be considered, together with all the other information available, when reaching a preliminary decision.
37. An example of a condition could relate to the payment of an annual fee. A condition can also be set with respect to ensuring the relevant person has the ability to secure the proper management of the site. In summary, conditions can relate to any factors which are relevant to the person's competence to manage the site, the management structure, or funding arrangements for the site, an associated person's influence, and any other relevant factors.
38. **Example 1** - A local authority has evidence of a site owner's failure over a certain period of time to address residents' complaints. This is an example of poor management which could be resolved by the site owner implementing an adequate complaints procedure. A condition could be attached requiring the site owner to "*implement an effective and accessible three stage complaints process for residents by xx date and provide the LA with quarterly reports of complaints and outcomes, from that date and for the first year*".

If the condition is met within the specified time frame, the local authority can record this in the register. If, at a future date, it is found that the site owner failed to implement a complaints procedure, a further opportunity to comply may be given and this could include a new condition of the site owner providing quarterly reports of complaints and outcomes for each year. The site owner could also be expected to complete a relevant “Continuous Professional development Customer Service/Dealing with complaints” course by a certain period. However, should the local authority consider the actions as unlikely to achieve the desired outcome, the site owner could be removed from the register.

39. **Example 2** – If, when considering an application, certain documents or information are unavailable to the applicant, because of delays from third parties, the local authority may wish to attach a condition to the entry on the register that the site owner “is to provide the authority by registered post, with the original xx document by xx date”.
40. **Example 3** - An associated person has been visiting the park and, through their action ‘X’, has caused distress to the residents impacting their well-being and security. A condition could be attached to the register requiring the site owner to put measure(s) in place by xxx date preventing the associated person, or any other person, from carrying out action X on the site.

Decisions not to include the applicant on the register

41. Should the Council determine that the applicant does not meet the requirements, and attaching conditions would not be appropriate, it can refuse to grant the application.
42. Where the Council makes a decision to include the applicant on the register, subject to conditions, or not to include the applicant on the register, a preliminary decision notice to the applicant must be issued.
43. The preliminary decision notice must clearly state:
- (a) the date the preliminary decision notice is served;
 - (b) the preliminary decision;
 - (c) the reasons for it;
 - (d) the date it is proposed that the final decision will have effect;
 - (e) information about the right to make written representations
 - (f) where the preliminary decision is to refuse the application, the consequences of causing or permitting the land to be used as a relevant protected site in contravention of the regulations; and
 - (g) where the preliminary decision is to grant the application subject to conditions, the consequences of failing to comply with any conditions.

Right to make a representation

44. An applicant who receives a preliminary decision notice will have 28 days in which to make representations to the local authority. The 28-day period begins with the day after the day on which the notice was served.
45. The Council is obliged to consider and take any representations it receives into account before making a final decision.

Final decision notice

46. The Council must, as soon as reasonably practicable, after the end of the period allowed for making representations, make a final decision and serve the decision notice on the applicant.
47. The final decision notice must set out:
- (a) the date the final decision notice is served;
 - (b) the final decision;
 - (c) the reasons for it;
 - (d) when the decision is to take effect;
 - (e) information about the right of appeal and the period within which an appeal may be made;
 - (f) where the decision is to refuse the application, the consequences of causing or permitting the land to be used as a relevant protected site in contravention of the regulations; and
 - (g) where the decision is to grant the application subject to conditions, the consequences of failing to comply with any condition.

Appeals

48. The applicant can decide to appeal the decision by making an application to the First-tier Tribunal (Property Chamber) (“the tribunal”) within specific timeframes set by the tribunal. The applicant is permitted to appeal against any decisions served by the Council. These could include:
- (a) including the relevant person on the register for an effective period of less than 5 years;
 - (b) including the relevant person on the register subject to conditions; and
 - (c) rejecting the application.
49. Where an applicant accepts the Council’s decision not to include the person originally stated in the application on the register, they will be required to seek alternative management arrangements to comply with the fit and proper person requirement. If they fail to do so they will be committing an offence.
50. An appellant will not be able to claim compensation for losses incurred pending the outcome of an appeal.

Withdrawal or amendment of notice

51. There may be circumstances where the Council may decide not to continue or to withdraw a previously agreed action such as after serving:
- (a) a preliminary decision notice but before service of the final decision notice;
 - (b) a final decision notice but before the decision to which it relates takes effect; or
 - (c) a notice of proposed action but before the proposed action is taken.
52. To withdraw or amend a notice, the Council must serve notice to the person on whom the original notice was served.
53. There are no requirements for notices to contain specific information, however, it is recommended that a withdrawal or amendment notice should state:
- (a) that it is withdrawing/amending the original notice (a copy of the original notice should be attached for reference);
 - (b) the reasons for withdrawing the notice;
 - (c) the date it takes effect; and,
 - (d) the implications of the decisions in relation to the person's entry on the register.

Removal from the register

54. If, after a person is included in the register, and new evidence relevant to the person's inclusion becomes available the Council may decide to:
- (a) remove the person from the register;
 - (b) impose a condition on the inclusion of the person in the register (whether or not there are conditions already imposed);
 - (c) vary a condition; or
 - (d) remove a condition.
55. The Council uses its judgement when determining whether to review an entry and consider any subsequent actions are required. It is recommended that any such decision should be related to the person being a fit and proper person rather than, for example, site licensing issues which are governed separately. If the Council decides to take any of the actions listed in paragraph 51 (a) to (c) above, it must serve a notice of any proposed action on the occupier.
56. The notice of proposed action must clearly state:
- (a) the date the notice of proposed action is served;
 - (b) the action the local authority proposes to take;
 - (c) the reasons for it;
 - (d) the date it is proposed that the local authority will take the action;
 - (e) information about the right to make written representations;
 - (f) where the proposed action requires the removal of a person from the register, the consequences of causing or permitting the land to be used as a relevant protected site in contravention of the regulations; and
 - (g) where the proposed action is to impose a condition on the inclusion of a person in the register or to vary a condition, the consequences of failing to comply with said conditions.

57. A notice of proposed action is not required if the Council decides to remove a condition attached to an entry. A removal of a condition is viewed widely as being a positive step, which is unlikely to be opposed. It is for that reason that a notice of proposed action is not required. As good practice though, it is recommended that local authorities make the site owner or their manager aware of the decision in writing and also ensure the register is updated.

Notice of action taken

58. Where a notice of proposed action is given, the occupier will have 28 days, starting from the day after the notice is served, in which to make representations.

59. The Council must, as soon as reasonably practicable after the end of the 28-day period, decide whether to carry out the proposed action.

60. Where the Council decides to take the action, it must serve a further notice on the occupier, indicating the action that has been taken, within the period of 5 working days beginning with the day after the day on which the action was taken.

61. The notice of action must set out—

- (a) the date the notice of action is served;
- (b) the fact that they have taken the action;
- (c) the reasons for doing so;
- (d) the date the action was taken;
- (e) information about the right of appeal and the period within which an appeal may be made;
- (f) where the action is to remove a person from the register, the consequences of causing or permitting the land to be used as a relevant protected site in contravention of regulations; and
- (g) where the action is to impose a condition on the inclusion of a person in the register or to vary a condition, the consequences of failing to comply with any condition.

Offences

62. There are 3 offences which can occur within the Regulations. They are as follows:

- Operating a site in contravention of the fit and proper person regulations - The site owner will have certain defences under the Regulations in any proceedings brought against them.
- Withholding information or including false or misleading information in the registration application - The site owner will not have any defences under the Regulations in any proceedings brought against them for this offence.
- Failing to comply with a specified condition - The site owner will have certain defences under the Regulations in any proceedings brought against them.

63. The Council is responsible for enforcing the Regulations. A site owner found guilty of any of the above offences will be liable on summary conviction to a level 5 (unlimited) fine.

Defences

64. One defence is available to a site owner who has inherited a site and would be found to have a reasonable excuse for failing to make an application within the relevant periods as set out below.

Relevant periods in specific circumstances

65. The below table outlines limited circumstances where a site owner may have a defence.

Row	Circumstance	Relevant period for making an application in the circumstance
1	The occupier held a site licence immediately before the day on which regulation 4 (operating a site without being a fit and proper person) came into force on 1 October 2021.	From 1 st July 2021 before 1 October 2021, the day on which regulation 4 came into force.
2	The period of a person's inclusion in the register in relation to the site has come to an end other than as a result of action by the local authority under regulation 8(1)(a) (removal from the fit and proper register after new relevant evidence becomes available).	Not less than two months before the end of the period of the person's inclusion in the register.
3	At the time that the occupier became entitled to within the period of 3 months possession of the land it was in use as a relevant protected site; and within the period of 28 days beginning with the day after the day on which the person became the occupier of the land the occupier notifies the relevant local authority of its intention to make an application under regulation 6 (application for inclusion in the register).	Beginning with the day after the day on which the person became the occupier of the land.
4	At the time that the occupier became entitled to possession of the land it was in use as a relevant protected site; and the occupier does not give the notification referred to in row 3 above.	Within the period of 28 days beginning with the day after the day on which the person became the occupier of the land.
5	A person appointed to manage the site no longer does so; and within the period of 28 days beginning with the day after the relevant day the occupier notifies the relevant local authority that the person no longer does so.	Within the period of 3 months beginning with the day after the relevant day.
6	A person appointed to manage the site no longer does so; and the occupier does not give the notification referred to in row 5 above.	within the period of 28 days beginning with the day after the relevant day
7	The breach of regulation 4(1) (operating a site without being a fit and proper person) arises because the local authority has removed a person from the register; and within the period of 28 days beginning with the relevant day in relation to the local authority's decision the occupier notifies the	Within the period of 3 months beginning with the relevant day.

	relevant local authority of its intention to make a new application under regulation 6 (application for inclusion in the register) in relation to the site	
8	The breach of regulation 4(1) arises because the local authority has removed a person from the register; and the occupier does not give the notification referred to in row 7 above.	Within the period of 28 days beginning with the relevant day.
9	The breach of regulation 4(1) (operating a site without being a fit and proper person) arises because the local authority has rejected an in-time application; and within the period of 28 days beginning with the relevant day in relation to the rejected application the occupier notifies the relevant local authority of its intention to make a new application under regulation 6.	Within the period of 3 months beginning with the relevant day.
10	The breach of regulation 4(1) (operating a site without being a fit and proper person) arises because the local authority has rejected an in-time application; and the occupier does not give the notification referred to in row 9 above.	Within the period of 28 days beginning with the relevant day.

The Fit and Proper Persons Register

66. The Council maintains a register of persons who they are satisfied are fit and proper persons to manage a site in their area. This register is open to inspection by the public during normal office hours. This register is also published online.
67. The register provides a record of the outcome (as discussed above) of the fit and proper person tests the Council has carried out for sites. The register includes the following:
- (a) the name and business contact details of the person;
 - (b) the name and address of the relevant protected site to which the application relates;
 - (c) the status of the person (site owner or manager of the site);
 - (d) the dates of the first and last day of the period for which the person's inclusion in the register has effect;
 - (e) whether any condition is attached to the person's inclusion in the register; and
 - (f) where any condition is attached to the person's inclusion in the register—
 - (i) the number of any such conditions;
 - (ii) the dates of the first and last day of the period for which any such condition applies (if applicable); and
 - (iii) the date any condition is varied or satisfied (if applicable).
68. Where a person has met the fit and proper person test, the register will give details of that person and of the site, including decisions made on how long a person's inclusion is for, up to a maximum of 5 years.
69. In order to comply with the fit and proper person requirement a site owner must at least two months before the period (e.g. 5 years) comes to an end submit a new application for the person (or alternative) to be included in the register.

70. Where there are rejected applications, the following information must be included in the register:

- (a) the name and address of the site to which the application relates;
- (b) that an application in respect of the site has been rejected; and
- (c) the date on which the application was rejected.

Details of the rejected application will remain on the register until a successful fit and proper person application is made in respect of the owner or manager of the site.

It must be noted that the name of the rejected applicant will not be included on the register. Local authorities will however be able to consider requests for further information about the entry on the register, for example, the details of the specific conditions attached and any additional information, on a case by case basis and in accordance with data protection legislation.

71. Where the local authority has, with the site owner's consent, appointed a person to manage the site, the local authority must include the following information:

- (a) the name and business contact details of the person;
- (b) the name and address of the site which the person has been appointed to manage;
- (c) the status of the person;
- (d) the dates of the first and last day of the period for which the person's inclusion in the register has effect;
- (e) whether any condition is attached to the person's inclusion in the register; and
- (f) where any condition is attached to the person's inclusion in the register—
 - (i) the number of any such conditions;
 - (ii) the dates of the first and last day of the period for which any such condition applies (if applicable); and
 - (iii) the date any condition is varied or satisfied (if applicable).

Policy on Private Sector Housing Enforcement

Appendix 7 – Database of Rogue Landlord

In deciding the period of time for which the entry will be maintained i.e. remain on the rogue landlord database, the Local Housing Authority will have regard to the following factors:

(a) Severity of the offence

The severity of the offence and related factors, such as whether there have been several offences committed over a period of time, should be considered. Where an offence is particularly serious and/or where there have been several previous offences; and/or the offence(s) have been committed over a period of time, then the decision notice should specify a longer period of time. Where one or more of these factors are absent, it may be appropriate to specify a shorter period. The local housing authority will have due regard to the guidance on civil penalties as an alternative to prosecution when assessing the level of harm caused by such offending.

(b) Culpability and serial offending

The local housing authority will consider whether the offender has any previous convictions and/or financial penalties which have been issued. If an offender has previous convictions for Banning Order offences and/or financial penalties issued against them, it is likely that the period specified in the decision notice will be increased to reflect a pattern of offending. The local housing authority will have due regard to the guidance on civil penalties as an alternative to prosecution when assessing the level of culpability to be applied to such offending.

(c) Deter the offender from repeating the offence

The local housing authority will consider whether the period calculated is sufficient to deter the offender from committing further offences. If the local housing authority does not think the period is sufficient, the period may be increased to ensure deterrence is met.

(d) Mitigating Factors

The local housing authority may reduce the time if mitigating factors are prevalent. Examples of mitigating factors may include genuine mistake, health issues or a recent bereavement that has contributed to the commission of the offence.

(e) Aggravating Factors

The local housing authority will give due consideration to the Sentencing Council guidelines and may increase the time if it is felt appropriate to do so given the circumstances of the offending.

When the Council has made the decision to exercise its powers under the Act to make an entry on the database, it will use the following steps and considerations to determine the length of time that the subject should be added to the database:

1. Assess the effect of a) above – the severity of the offence and b) above - the culpability and serial offending using the matrix below.

		Severity of offence.		
		Low	Medium	High
Culpability and serial offending	Very High	10yrs	10yrs	15yrs or more
	High	5yrs	10yrs	10yrs
	Medium	2yrs	5yrs	10yrs
	Low	2yrs	2yrs	5yrs

2. Apply any mitigation (reduction) presented in relation to the initial calculation and recalculate as necessary.

The Council may reduce the time if mitigating factors are prevalent.

Examples of mitigating factors may include genuine mistake, health issues or a recent bereavement that has contributed to the commission of the offence:

- Very strong mitigating factors, e.g. unavoidable, personal health, bereavement
- Reasonable mitigating factors, however little done to overcome these to prevent offence from Occurring
- No mitigating factors

3. Apply any aggravating factors - the Council may increase the time if falsified and/or brazen mitigating factors exist, for example, lack of cooperation with the Council, persistent offending or a clear disregard for the legal responsibilities.

The calculated timescale of an entry on the database cannot be less than 2 years as the minimum timescale for an entry on the database for a person convicted of a banning order offence is two years beginning on the day that the entry is made. The calculated timescale for the duration of a Banning Order cannot be less than 12 months.

The matrix allows for a banning of 15 years or more to be considered. In the very worst cases Coventry City Council may apply for an indefinite ban.

This Council must remove an entry it made if all the convictions on which the entry was based have been overturned on appeal or if or ordered to do so by the First Tier Tribunal.

In some circumstances the Council has the power to remove or vary an entry on the database including reducing the period for which the entry it made must be maintained. In those circumstances, the Council will consider the same factors set out in this policy to be used, when making the decision whether or not to make an entry on the database and the same factors of how long an entry shall remain on the database.

The procedures the Council must follow are set out in the Act. There are legal rights of appeal set out to the First Tier Tribunal in relation to decisions the Council makes to use its powers in relation to the database.

Statute	Provision	Offence
Protection of Eviction Act 1977	Section 1(2), (3) and (3A)	Unlawful eviction and harassment of occupier
Criminal Law Act 1977	Section 6(1)	Violence for securing entry
Housing Act 2004	Section 30(1)	Failing to comply with an improvement notice
	Section 32(1)	Failing to comply with a prohibition order
	Section 72(1), (2) and (3)	Offences in relation to licensing of Houses in Multiple Occupation
	Section 95(1) and (2)	Offences in relation to licensing of houses under Part 3
	Section 139(7)	Contravention of an overcrowding notice
	Section 234(3)	Failure to comply with management regulations in respect of Houses in Multiple Occupation
	Section 238(1)	False or misleading information
Regulatory Reform (Fire Safety) Act 2005	Article 32(1) and (2)	Fire safety offences
Health and Safety Act 1974	Section 33(1)(c) where a person contravenes any requirement specified in regulation 36 of the Gas Safety (Installation and Use) Regulations 1998 (6)	Gas safety offences - duties on landlords
Immigration Act 2014	Section 33A (1) and (10)	Residential tenancies – landlord offences
	Section 33B (2) and (4)	Residential tenancies – agent offences
Fraud Act 2006	Section 1(1)	Fraud
	Section 6(1)	Possession etc. of articles for use in frauds
	Section 7(1)	Making or supplying articles for use in frauds
	Section 9(1)	Participating in fraudulent business carried on by sole trader etc.
	Section 11(1)	Obtaining services dishonestly
	Section 12(2)	Liability of company officers for offences by company

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**Coventry City Council
Equality and Consultation Analysis (ECA) Form**

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: Adrian Chowns

Name of Service Area/Proposal: Regulatory Services – Review of Private Sector Housing Enforcement Policy 2022

Head of Service: Andrew Walster

Date of completion: September 2022

Background to the planned changes

1. What is the background to the planned changes? Why is this change being considered?

New and updated legislation has been provided by Government to deal with certain offences regarding housing in the Private Rented Sector, which can be pursued by the Council to address poor housing conditions and rogue landlords.

In order for the Council to use these powers it must have reviewed and updated its policy setting out how it will implement these powers in relation to properties in the PRS. The original policy was approved in 2018 and reviewed in 2021 and since that time new powers have been introduced that are now incorporated into the policy document.

This report provides the details of this review and the new powers included in the revised policy.

2. Who do you need to consider as part of this ECA? **stakeholder analysis*

Landlords
Agents
Tenants in the Private Rented Sector
Residents living in the city.

Coventry City Council Equality and Consultation Analysis (ECA) Form

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?

There is no requirement to conduct a consultation exercise because the process for implementing civil penalties is set out in Government guidance which was developed as part of a national consultation exercise by the Government.

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
Gender reassignment
Marriage/Civil Partnership
Pregnancy/Maternity
Race
Religion/Belief
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

The Policy will not have a negative impact on any protected groups as it not specific to:-

- Age
- Disability
- Gender
- Gender reassignment
- Marriage/Civil Partnership
- Pregnancy/Maternity
- Race
- Religion/Belief
- Sexual Orientation

Coventry City Council Equality and Consultation Analysis (ECA) Form

The adoption of the new powers and the civil penalties will have a positive impact upon all groups. The use of civil penalties and other enforcement action detailed in the policy will enable the Council to take formal enforcement action against rogue landlords.

- 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.)

The amendment of the policy for enforcing standards in private sector housing will enable the Council to implement a wider range of powers available to them, providing a holistic approach to dealing with problems in the private rented sector. In doing so the Council will be improving the standard and management of properties in the private rented sector and sending out a positive message to landlords that it takes the issue of poor housing extremely seriously.

- 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.

Housing is a key determinant of health and cold, damp, unsafe homes impact on all groups but particularly the young and old. By improving standards in privately rented properties the occupants will potentially benefit from a direct improvement in health and be at less risk of accidents.

- 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*

Coventry City Council
Equality and Consultation Analysis (ECA) Form

- 7. What are the likely impacts of this project/review on staff from protected groups?** For further support please contact Andy Hyland (andy.hyland@coventry.gov.uk tel: 7683 3426)

Coventry City Council
Equality and Consultation Analysis (ECA) Form

Form 2

This section should be completed AFTER any consultation has been concluded.

Author of this document:

Date of completion:

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.

Outcome of equality impact

9. Indicate which of the following best describes the equality impact of this project/review:

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.

Coventry City Council Equality and Consultation Analysis (ECA) Form

Approvals from Director and Cabinet Member

Name of ECA Author: Adrian Chowns

Date: 5th September 2022

Director: Andrew Walster

Cabinet Member: Councillor David Welsh and Councillor
Abdul Khan

Please detail below any committees, boards or panels that have considered this analysis.

Name	Date	Chair	Decision taken
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Next steps

Please send this completed ECA to the Insight Team as follows:

Wendy Ohandjanian (wendy.ohandjanian@coventry.gov.uk tel. 7683 2939)

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Cabinet
Council

11th October 2022
18th October 2022

Name of Cabinet Member:

Cabinet Member for Children and Young People – Councillor P Seamen

Director Approving Submission of the report:

Director of Children's Services

Ward(s) affected:

All

Title:

Family Hub and Start for Life Programme

Is this a key decision?

Yes - the proposals involve financial implications in excess of £1m per annum and are likely to have a significant impact on residents or businesses two or more electoral wards in the City.

Executive Summary:

The Council currently operates 8 Family Hubs to deliver place-based integrated offer to families across the city, including the offer from the buildings, through an outreach model and a developing digital offer.

Coventry City Council has been selected to apply to join the national Family Hub and Start for Life Programme (first 1001 days), with financial investment to strengthen its offer to babies, children and families building on the achievements to date.

This programme will attract between £4.06m - £4.25m grant funding across the 3 years 2022/23 to 2024/25 to deliver the programme objectives. In addition to this Coventry City Council can bid for additional trailblazer funding of £183k during 2022/23 allowing us to be one of the first 15 Local Authorities to lead the way in delivering the programme.

This report includes an overview of the Family Hub and Start for Life Programme and the funding that Coventry City Council is eligible for. The report includes a description of key service priorities, including a focus on community outreach and engagement with communities to ensure the co-production of the maturity and expansion of family support services.

Recommendations:

Cabinet is recommended to:

- 1) Note the proposals of the Family Hub and Start for Life programme and Trailblazer programme.

Cabinet is requested to recommend that Council:

- 1) Accepts the grant funding for the purposes outlined in this report in respect of the Family Hub and Start for Life programme and the Trailblazer programme, in the event that that the City Council is successful in its grant bid the City Council.
- 2) Delegate authority to Director of Children's services, following consultation with the Chief Operating Officer and Chief Legal Officer, to agree and sign any grant agreement.
- 3) Agree that the Director of Children Services' is named as the Single Accountable leader for the Start for Life Offer.
- 4) Agree that future reports on this grant and the Family Hub and Start for Life programme are received by the Cabinet Member with responsibility for Children Services

Council is recommended to:

- 1) Accept the grant funding for the purposes outlined in this report in respect of the Family Hub and Start for Life programme and the Trailblazer programme, in the event that that the City Council is successful in its grant bid the City Council.
- 2) Delegate authority to Director of Children's services, following consultation with the Chief Operating Officer and Chief Legal Officer, to agree and sign any grant agreement.
- 3) Agree that the Director of Children Services' is named as the Single Accountable leader for the Start for Life Offer.
- 4) Agree that future reports on this grant and the Family Hub and Strat for Life programme are received by the Cabinet Member with responsibility for Children Services

List of Appendices included:

None

Background papers:

None

Other useful documents

[HM Government : The Best Start for Life : A vision fir the 1001 critical days](#)

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, 18th October 2022

Report title: Family Hub and Start for Life Programme

1. Context (or background)

- 1.1 Family Hubs are a place-based way of joining up services locally in the planning and delivery of family services. They bring together services to improve access, build connections between families, practitioners, services and providers and put relationships at the heart of family support. Family hubs offer universal and targeted support to families with children of all ages up to 19 years and should provide support to families with young people with SEND up to 25 years. A comprehensive and effective Start for Life offer (0-2 years) should be at the core of the offer.
- 1.2 Coventry has pioneered the development and delivery of a Family Hub offer since 2018, and there are currently 8 Family Hubs delivering services to children, young people and their families through place based integrated working by a range of services, with some outreach and an emerging digital offer.
- 1.3 Coventry has been influential in the development of national and regional policy and practice regarding the development and delivery of Family Hubs to deliver early help to children, young people and families through place-based integration of services and working with our communities and residents to ensure that their needs are met, and their strengths and assets are utilised to help others
- 1.4 At the 2021 Autumn Budget, HM Government announced a three-year Family Hub and Start for Life Programme to deliver a step – change in outcomes for babies, children, young people, parents, and carers. As part of this the government allocated £301.75M to enable 75 eligible Local authorities in England to deliver a package of family support and Start for Life services, a national programme jointly overseen by the Department of Health and Social Care and the Department for Education.
- 1.5 Coventry Local Authority has been notified that it is eligible for an allocation of this funding, having been pre-selected using Income Deprivation Affecting Children Indices (IDACI), and has been invited to complete a sign-up application.
- 1.6 The sign-up form for the Family Hubs and Start for Life Programme requires commitment to the programme and to confirm the ability to deliver the programme's ask as outlined in the programme guide, and to consider applying to be a trailblazer LA at the same time.
- 1.7 Trailblazers are a group of 15 selected Local authorities who will lead the way in delivering the programme, making the fastest and most ambitious improvements to services and establishing best practices to benefit all LAs delivering the programme.
- 1.8 The funding is to enable and enhance the delivery of integrated family support for families with children of all ages, as well as Start for Life services (midwifery, health visiting, parent-infant relationships and mental health, breastfeeding, safeguarding, and SEND offer)
- 1.9 More specifically the funding must enhance the Family hub offer (building, outreach and digital offer) regarding parent- infant mental health support, infant feeding support services, evidence-based parenting programmes, and to publish a clear "Start for Life offer" and ensure that parents' and carers' voices are heard in the design and delivery of services through Parent and Carer Panels.
- 1.10 It is anticipated in Coventry that the total indicative allocation for the Family Hubs and Start for Life programme for Coventry is between £4.06m and £4.25m over three financial years

of 2022-23, 2023-24 and 2024-25. A provisional breakdown of this allocation is outlined in table 1.

Table 1: Provisional allocation for your Coventry local authority

2022-2023	2023-2024		2024-2025		Total 2022-2025	
Total	Lower range	Upper Range	Lower Range	Upper Range	Lower Range	Upper Range
£1,037,000	£1,666,000	£1,775,000	£1,387,000	£1,472,000	£4,090,000	£4,284,000

1.11 There are clear expectations regarding how the funding should be allocated to deliver the required funding services as indicated in table 2 (which will be enhanced in year 1 if Coventry is selected to be a Trailblazer LA)

Workstream	%	Range of total funding		Trailblazer funding
		Lower	Higher	
Family hubs programme spend	19.90%	813,910	852,516	
Family hubs capital spend	5.00%	204,500	214,200	
Perinatal mental health and parent-infant relationships	30.80%	1,259,720	1,319,472	100,000
Parenting support	16.10%	658,490	689,724	33,000
Infant feeding support	15.40%	629,860	659,736	50,000
Home learning environment services	9.60%	392,640	411,264	
Publishing 'Start for Life' offers and Parent and Carer Panels	3.20%	130,880	137,088	
Total		£4,090,000	£4,284,000	£183,000

1.12 The Family Hub programme guide sets the minimum and “go further” expectations for each of these offers, and as well as for the other services expected to be provided within a Family Hub offer (which are not additional funded). The sign-up application requires agreements to have been made as to which of the “go further” Coventry will commit to (across the three aspects of the services – in the building, within the community, and digitally) to be achieved by the end of the funded period.

1.13 The trailblazer application (which must be completed at the same time) should include a description of the current Coventry offer and evidence of our achievements to date, and then our aspirations for innovative practice in year 1 to accelerate this offer. Trailblazers will be expected to deliver visible, tangible changes for families in the 2022-2023 financial year, which will then be sustained and improved over the rest of the programme.

1.14 Trailblazers will be expected to make the quickest and most ambitious and innovative progress in delivering the Family Hubs and Start for Life programme. This will include going faster and harder in delivering new or improved services for at least one of the following areas funded: perinatal mental health and parent-infant relationships, infant feeding, and parenting support. Whilst trailblazers may be selected if applying for just one or two programmes, priority will be given to trailblazers that are ambitious and innovative across all three areas. Therefore, Coventry wishes to apply for all three aspects of the funding.

- 1.15 Trailblazers will also be expected to share delivery experience and expertise with other local authorities and the government. Coventry is well positioned to take on this role, having established a “Lets’ Talk about Family Hubs” Community of Practice as part of the regional project in May 2022 in which Coventry lead an assessment over the 14 Local Authorities in the West Midlands ADCS network and designed a blueprint for the agile roll out of Family Hubs.
- 1.16 All families need support from time to time to help their babies and children thrive and the ambition of the national Family Hub and Start for Life Programme is that every family will receive the support when they need it and should have access to the information and guidance that they need to care for and interact positively with their babies and children and to look after their own wellbeing. Investing in supporting families to care for their babies, children and young people has an important role to play in reducing health and educational inequalities, and improving their longer-term physical, emotional, cognitive and social outcomes.
- 1.17 Local services (public and the voluntary, community and faith sector), working together and in partnership *with* families, all have a vital role to play in supporting all families. Family Hubs are therefore positioned by the Government to be the universal offer to all families, with a mandate to improve the joining up between state and non-state services and taking a whole family approach to better support families to access the help that they need.
- 1.18 Evidence is clear that identifying risks early and preventing problems from escalating leads to better long term- outcomes. Universal services should therefore prioritise working within the Family Hub partnership offer and made available to all local families who need them to identify and respond to issues early before they develop into more complex problems. This will mean that some families will need additional targeted help, and the Family Hub should continue to be an enabler and driver delivering early help to families in Coventry, with clear and accessible pathways to access targeted service offer and to intensive family support (Supporting Families)
- 1.19 The first 1001 critical days, from conception to two years of age, is a time of rapid development and the experiences of a child during this time lay the foundation for life long emotional and physical health, Therefore the love, care and nurture that a baby experiences in this period is particularly important, in the context of families who are supported through advice, guidance and help to ensure that their children have the best start in life.
- 1.20 In July 2020, the Prime Minister asked the Rt Hon Dame Andrea Leadsom MP to chair a review into improving health and developmental outcomes for babies in England, and the subsequent “The Best Start for Life: A vision for the 1001 Critical days” report was published. The report identified support with breastfeeding, perinatal mental health, and parent– infant relationships as essential services which are vital to ensuring that every baby gets the best start in life. The programme therefore includes additional investment to ensure these essential services are available families who needs them in Coventry, through access to services in the hub buildings, through community outreach and in the digital domain.
- 1.21 The COVID-19 pandemic has also had an impact on access to services for children and families and the evidence of this impact is continuing to emerge, such as increased demand for mental health services, concerns about children with developmental delay, and isolation for vulnerable families.
- 1.22 It is therefore important that services reintegrate and work hard to restore existing and new services to help families get the support they need, building on the experience of good partnerships and new and flexible working practices, such as online support.

1.23 The Family Hub programme's objective is to join up and enhance services delivered through transformed family hubs, ensuring all parents and carers can access the support they need when they need it, with funding provided to enhance Coventry's family hub model, improve the universal Start for Life offer and support the continued transformation of family support. In summary the programme will:

- provide support to parents and carers so they can nurture their babies and children, improving health and education outcomes for all
- contribute to a reduction in inequalities in health and education outcomes for babies, children, and families across England by ensuring that support provided is communicated to all parents and carers, including those who are hardest to reach and/or most in need of it
- build the evidence base for what works when it comes to improving health and education outcomes for babies, children, and families in different delivery contexts

1.24 Further priorities for Coventry, which also reflect national guidance and good practice, include:

- improving how local services share information and work together to provide holistic support for families, especially vulnerable families such as families with children with SEND, refugee and asylum-seeking families, and those not yet accessing services from our current Family Hubs
- ensuring that the Start for Life offer is clear, accessible, and seamless
- embedding the voices of parents and carers to co-produce the Family Hub offer and influence the continuous improvement of the offer
- enhancing and expanding services which seek to identify and address needs at an early stage before more specialist support is required
- ensuring additional targeted interventions which support vulnerable and under-served populations are included as part of the offer and delivered through the family hub model
- supporting workforce capacity and capability through workforce models that incorporate skill mix, facilitating join-up of the multi-professional workforce to provide continuity of care to all families, improving multi-agency training, addressing existing skill gaps, and ensuring empathy is at the heart of practice
- understanding what works and sharing best practice through robustly evaluating the Family Hub Offer against a set of measurable quantitative and qualitative objectives and contributing to the establishing of communities of practice

1.25 The key principles and recommendations for the continued design and deliver of the Family Hub offer in Coventry should include

1. **Join-up of local partners involved in the early years and family support system** – including local authorities, NHS, safeguarding, voluntary, community, faith and charity sector partners – to plan and deliver services in a place-based way,

including co-location, which is aligned with other initiatives and relevant local strategies.

2. **Strong local leadership and a commitment across partners to prioritise the early years, and support families with children of all ages.** The Director of Children's Services will be the single accountable leader responsible for driving and overseeing improvements in Coventry's Start for Life services. Local leadership should be assisted by the Early Help Partnership governance structure, a subgroup of the Coventry Safeguarding Children' Partnership, which is inclusive of delivery partners and key stakeholders, to ensure that priorities are shared and understood, and that organisations encourage and challenge each other to deliver positive outcomes.
3. **A skilled workforce working in integrated ways to provide families with universal and targeted support, including creating capacity through new workforce models that incorporate skill mix and facilitate closer working across professions so that families receive the holistic, whole family support that they need as early and effectively as possible.**
4. **Continuity of care between professionals and peer supporters,** facilitated by the appropriate person for the family, to ensure families receive a seamless offer of support and do not have to repeat their story. Co-location of staff, appropriate data-sharing arrangements and join-up of case management systems play an important role in enabling this.
5. **Consultation with families, including young people, parents, and carers, to codesign and improve services.** The family hub model includes community ownership and co-production with families, children, and young people. This programme provides funding to establish Parent and Carer Panels which will play a key role in designing and continuously improving family services, through regular feedback from families from different communities and with different needs.
6. **Safeguarding** underpins all aspects of Start for Life and family services delivered through family hubs, as set out in 'Working Together to Safeguard Children'. The principles and duties of safeguarding children, young people, and adults at risk are integral to the Family Hub operating model.
7. **High quality and evidence-based support.** Services commissioned to deliver within the Family Hub offer must be evidence-led and based on the best available evidence. Where there is no current evidence base there will be a focus on implementation science to develop a better understanding of "what works".

1.26 Coventry is required to use the funding to commit to delivering visible change for families within the first half of 2023 (calendar year) which may include

- clearly communicated expansion of our co-located services
- clear and enhanced opportunities for families to be involved in the co-design of family hubs through our Early Help advisory boards, governance, and in the delivery of services themselves, such as peer support programmes or mentoring schemes
- adaptations to our family hubs buildings to improve the environment and suitability for different ages and needs
- Expansion of operating hours

1.27 The transformation funding is not intended to cover the operational costs of Family Hubs and Start for Life services. For family hub services that are not funded as part of the programme (as described in the programme guide), funding from existing funding sources will need to be continued.

2. Options considered and recommended proposal

2.1 That Coventry signs up to the national Family Hub and Start for Life Programme and applies to be a trailblazer, bringing its current offer into alignment with the national programme and maximising its universal place based early help offer to children, young people and families.

2.2 A local population needs assessment should be undertaken in the first year of the programme (2022-2023).

2.3 A delivery plan will be submitted by Dec 2022 that will demonstrate how the funding will be used to achieve the programme objectives, the overall ambition for the changes that are planned to take place in the next three years, including the “go further” options agreed to take forward, which will form an integral component of the Early Help Strategy.

2.4 Coventry will also commit to work with the National Centre for Family Hubs and Start for Life Unit to share learning and best practice, implement central government branding requirements, to engage with the digital solutions being developed through the Family Hubs Growing Up Well project and Start for Life Unit’s work with NHSE to develop a Digital Personal Child Health Record, and agree to take part in the national evaluation of Family Hubs and Start for Life.

2.5 Sign up to the programme will require the support from senior executives and leads across the Local Authority, the Integrated Care Board, elected members, and senior strategic leaders within the local services providers that are relevant to the programme including the local health, education, and social care system, and the Voluntary and Community Sector.

3. Results of consultation undertaken

3.1 An analysis of the marketplace for services relevant to the funding and sign-up application (parenting support, perinatal mental health and parent - infant relationships, home learning environment support, infant feeding) is being conducted and there is opportunity for a range of services to be involved in delivering a comprehensive offer to families through the Family Hub Offer (in the building, through community outreach and virtually)

3.2 Consultation with members of the public to understand preferred methods of service delivery, including focussed consultation with people from deprived neighbourhoods will inform the procurement dialogue process and will be designed to improve proactive engagement with specific communities.

4. Timetable for implementing this decision

4.1 The invitation to sign up for the Family Hub programme (including the start for Life and trailblazer application) is the 30th of September, 2022.

5. Comments from Chief Operating Officer (Section 151 Officer) and Director of Law and Governance

5.1 Financial implications

5.1.1 The existing family hub model in Coventry is funded by a combination of core and grant funding, including Strengthening Families grant and contributions from Public Health.

5.1.2 This programme would attract additional grant funding of between £4.09m and £4.26m across three years, plus an additional £183k if the trailblazer application is successful

5.1.3 This grant is not intended to cover the operational costs of Family Hubs and Start for Life services. For family hub services that are not funded as part of the programme (as described in the programme guide), funding from existing funding sources will need to be continued.

5.1.4 The grant regime requires two returns per financial year:

- An interim statement of grant usage that will detail on financial spend per funded service in the programme
- An annual statement of grant usage at the end of the financial year that provides confirmation that expenditure was in line with the purposes specified in the grant determination letter

Funding in years two and three is subject to satisfactory periodic review of delivery performance.

5.1.5 Funding is expected to be spent in the financial year for which it is allocated, and not carried forward. This is a particular risk to the project in year 1, due to the timing of the announcement and agreement being mid-way 2022/23. To mitigate this risk, several actions have been identified that can be undertaken as soon as the funding is confirmed, so that change can be delivered at pace. Discussions are already underway with partners and stakeholders to ensure that they can deliver as necessary once the project officially starts.

5.1.6 A full and detailed project budget will be drawn up as part of the delivery plan, against which project spend will be monitored. All required spend will be funded through the grant awarded and no match funding will be required.

5.1.7 Careful consideration will need to be given to the action to be taken at the end of the grant regime, as this is time limited funding. If the grant ceases after the three years, then activity and provision will need to reduce back to levels that can be met within the existing budget envelop. However, the three-year timeframe gives opportunity to review and measure the impact of changes to service users during the project, and to incorporate best practice into the existing family hubs model when reviewing provision and delivery.

5.2 Legal implications

The work of family hubs and the proposals outlined in this report supports the City Council's duty to safeguard and promote the welfare of children within their area who are in need. The duty is a general duty to provide a range and level of services to Children in Need in the LAs area and not to a specific child.

6. Other implications

6.1 How will this contribute to the Council Plan (www.coventry.gov.uk/councilplan/)?

The Family Hub and Start for life programme supports the One Coventry Corporate Plan's vision to improve the quality of life for Coventry people by:

- Improving educational outcomes
- Making communities safer
- Improving health and wellbeing
- Protecting our most vulnerable people - Keeping children and adults safe from harm, Providing early intervention for families who need it; Enabling people to exercise choice and control in their daily lives ; Improving services for people experiencing domestic violence and Preventing homelessness and helping people who do become homeless
- Reducing health inequalities – giving our children the best start in life and helping support people facing multiple and complex needs.

The integration of services to support children, young people and their families is a way of delivering the Council's properties through active communities and empowering citizens and working together with partners across the voluntary, public and private sectors to

- Enable residents to self-serve by maximising the use of new technology
- Pool and share resources
- Solve local problems

6.2 How is risk being managed?

6.2.1. The possibility of a failure to identify providers to deliver on each aspect of the funded programme is minimized as there is already Family Hubs in place with a range of agencies and service providers committed to the programme, and a wider early help partnership offer to draw from.

6.2.2 The risks associated with possible failure to deliver on the key priorities of the programme and the requirements of the grant are mitigated using expert personnel who are highly experienced in developing and delivering national programmes, and who will be supported and advised by personnel from the Family Hubs Start for Life Unit, DHSC.

6.3 What is the impact on the organisation?

Delivering effective prevention and early help for children and their families to secure positive outcomes is a significant priority for many functions of the City Council, including Children's Services, Safeguarding, Education, Migration, Employment and Skills and Public Health. It is anticipated that the transformation and development of our Family Hub programme in alignment to the National programme specification will further improve the delivery of integrated early help and prevention services.

6.4 Equality Impact Assessment (EIA)

An Equalities Impact Assessment was undertaken in 2018 at the commencement of the Coventry Family Hub programme.

The Family Hub and Start for Life Programme will provide city wide support to children, young people and families and will enhance the work to reduce inequalities and outcomes for children, young people, and their families in need of early help. The programme will prioritise engagement with vulnerable communities including those seldom heard or less reached including children with disabilities, refugee and asylum-seeking families, families

experiencing homelessness, young carers, minoritized families and families living in poverty.

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

There are no implications

6.6 Implications for partner organisations?

A wide range of partner agencies (statutory, commissioned, and voluntary and community sector) take an active role in the Early Help Strategic Partnership which will provide the governance for this work, as a subgroup of the Coventry Safeguarding Children Partnership. A One Coventry approach is taken by this Strategic Partnership.

Report author(s):

Name and job title:

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Service:

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Contributor/approver name	Title	Service	Date doc sent out	Date response received or approved
Lara Knight	Governance Services Co-ordinator	Law and Governance	20.9.2022	21.9.2022
Names of approvers for submission: (officers and members)				
Finance : Tina Pinks	Finance Manager	Finance		16.9.2022
Legal : Julie Newman	Chief Legal Officer	Legal Services		16.9.2022
Director : John Gregg	Director of Children's Services	Children's Services		16.9.2022
Members: Councillor P Seamen	Cabinet Member for Children and Young People			21.9.2022

This report is published on the council's website: www.coventry.gov.uk/councilmeetings



Cabinet

11 October 2022

Name of Cabinet Member: Cabinet Member for Children and Young People – Councilor P Seaman

Director approving submission of the report: Director of Childrens Services -J Gregg

Ward(s) affected:

None

Title: Request for approval of acceptance of funding received from the Department of Education to implement 'Staying Close' provision for our care leavers.

Is this a key decision?

No

Executive summary:

An expression of interest (EOI) application was submitted to the Department for Education in April 2022 on behalf of Coventry Children's Services to be included in a national rollout of 'Staying Close' arrangements. Staying Close arrangements are being implemented to support young people leaving care from residential Childrens homes with an aim to provide these young people with the same support and opportunities as those who are eligible to remain in their foster care placements under the statutory 'Staying Put' arrangements. The application submitted a bid to enable Coventry Children's Services to provide additional ongoing support to all children leaving residential care as care leavers, within Coventry up to the age of 21. The grant requested, over a 3-year period was for a total of £1,009,647.

On July 1st, 2022, we were informed by the DfE that our bid had been successful and Section 31 grant funding (Education Act 2002) agreed.

The DfE also informed us that the grant amounts awarded for financial years 23/24 and 24/25 are indicative. Section 31 agreements will need to be agreed between both parties each year.

22/23	23/24	24/25	Total
£323,127	£336,403	£350,117	£1,009,647

Recommendations:

The Cabinet is requested to:

1. Approve the acceptance of the DfE grant awarded in the sum of £1,009,647 to be utilised towards the proposal which will enable looked-after children living in residential care within the city to access our 'Staying Close' offer and ongoing support until the age of 21

2. Delegate authority to the Director of Children's Services following consultation with the Chief Operating Officer and Chief Legal Officer, to negotiate final terms and approve entry into the grant funding agreement to secure the DfE funding with the City Council acting as the Accountable Body for the funding as well as any other agreements required to bring into effect the recommendations set out in this report.

List of Appendices included:

None.

Background papers:

None

Other useful documents

Application guidance & background information for Staying Close. Department for Education (2022)
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1066354/SC_LA_guidance_form_-_April_2022.pdf

The Break Staying Close, Staying Connected Project: Evaluation report. Department for Education (2020)
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/931987/Staying_Close_Break.pdf

The independent review of children's social care- Josh MacAlister (2022) Page 146 :
<https://childrensocialcare.independent-review.uk/wp-content/uploads/2022/05/The-care-experience.pdf>

Residential Care in England- Sir Martin Narey-(2016)
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/534560/Residential-Care-in-England-Sir-Martin-Narey-July-2016.pdf

Coventry City Council: Through Care Coventry- Local offer to Care Leavers
https://www.coventry.gov.uk/downloads/file/29100/through_care_local_offer.pdf

'Ready or not' – care leavers views of preparing to leave care- Department for Education (2022)
<https://www.gov.uk/government/publications/ready-or-not-care-leavers-views-of-preparing-to-leave-care/ready-or-not-care-leavers-views-of-preparing-to-leave-care#recommendations>

Has it or will it be considered by scrutiny?

No

Has it or will it be considered by any other council committee, advisory panel or other body?

No

However, the matter was considered by the Corporate Parenting Board on 28th April 2022. Approval was granted to submit an expression of interest application.

Update reports to be submitted to Corporate Parenting board on a quarterly basis.

Will this report go to Council?

No

Report title: Staying Close- Grant funding from Department for Education.

1. Context (or background)

- 1.1. Young people leaving residential care do not have the same opportunity to stay put as those in foster care do. Many young people leaving residential care have experienced early trauma and separation and multiple placement moves, so may not have access to support networks and sustained long-term supportive and meaningful relationships.
- 1.2. Coventry City Council has 4 homes for up to 16 children in care and offers medium to long-term care for children who are unable to safely live with their families. Alongside this we also commission placements for 12 children within the city with private providers.
- 1.3. Young people are offered informal ongoing support, from their previous carers within the homes where they lived.

2. Options considered and recommended proposal

- 2.1. Building upon our current Local offer to Care Leavers, we will ensure that all of our children living within a residential children's home in the city have access to Lifelong links, the House Project and Training Flat and are enabled to maintain relationships with a trusted carer, through outreach and ongoing support up until the age of 21.
- 2.2. The funding for the project will create 6.5 additional posts, over a period of 3 years and offer support to approximately 26 young people. A measure of success of the project will relate to enabling young people to move to independence with additional support, sooner than may have previously been viable. In turn this will create a cost saving against the budget and it is hoped, fund the project going forward.
- 2.3. As children approach adulthood they are supported to have an experience of living independently in the Training Flat. This enables the young person and their carers to identify areas to focus on to enable them to live safely and independently as they become adults. By creating 4 additional senior residential children's workers, we can ensure this support remains ongoing once they have moved on.
- 2.4. Lifelong Links, enables young people to identify adults, which may include family members that they wish to establish a long-term supportive relationship with. Through this, young people are empowered to build an ongoing network of support, which can include carers from the home they live in.
- 2.5. The House Project is currently set up to have 2 cohorts of 12 young people per year. By creating an additional House Project Personal advisor, Team Manager and professional support, alongside the senior RCW's we are able to increase the number of cohorts, with an additional cohort being identified for October 2022.

3. Results of consultation undertaken

- 3.1. Our children living within our children's homes and our care leavers tell us that they want to stay in touch with the key people involved in their lives and maintain relationships. Informally our residential staff offer ongoing support but have told us they wish they could do more to support the young people when they leave.

- 3.2. All of the residential staff involved in a 'Staying Close' workshop told us it was the 'right thing to do' and felt positive about the ongoing support they could offer. They felt that maintaining their relationships with our care leavers was a vital part of them continuing to feel cared for.
- 3.3. When some children living in our homes were asked about moving onto independence, they told us they would really want their carers to keep in touch and carry on helping them. One young person said, 'they already know me, I can talk to them about anything'.
- 3.4. The key messages and analysis of a national consultation with children in care and care leavers 'Ready or not' published by the DfE in 2022 found:

Many care leavers felt 'alone' or isolated when they left care and did not know how to get help with their mental health or emotional well-being. Many care leavers had no one they could talk to about how they were feeling or who would look out for them.

Care leavers needed someone they could rely on for help when they felt scared or worried

Care leavers valued being able to stay in touch with social workers, children's home staff and other professionals

One young person said: My children's home helped me the most; they still stay very close'.

4. Timetable for implementing this decision

- 4.1. Funding awarded from the grant will be paid on an annual basis, and subject to review in partnership with the DfE. We would aim to launch our Staying Close offer in October 2022.
- 4.2. Monthly Staying Close project meetings will be undertaken to review progress, update plans and a risk register. Project board members include colleagues from finance, House Project, Through Care, Residential Services and led by the Strategic Lead for Looked after children (corporate parenting).
- 4.3. There is a requirement to submit quarterly reports to the DfE with performance indicators, which will also be shared and reviewed by CSLT and within Corporate Parenting Board. The project members will also engage with 'What Works in Children's Social Care (WWCSC) research to evidence improved outcomes and continuously seek feedback from the young people involved to improve the project delivery.

5. Comments from Chief Operating Officer (Section 151 Officer) and Director of Law and Governance

5.1. Financial Implications

- 5.1.1 This grant will cover staff as outlined below, to support young people leaving residential care and enable them to access the same level of support as young people leaving fostering placements. These contracts will be fixed term in line with the grant award.

Area of spend	2022-23	2023-24	2024-25	Total
Team Manager (1 x G9)	£65,139	£67,275	£69,590	£202,004
Residential staff (4 x G6)	£167,637	£175,305	£183,115	£526,057
House Project staff (1 x G5)	£34,867	£36,124	£37,425	£108,416
Admin support (1 x G3)	£13,337	£13,820	£14,320	£41,477
Overheads (15%)	£42,147	£43,879	£45,667	£131,693
Total	£323,127	£336,403	£350,117	£1,009,647

5.1.2 The initial cohort of existing 16-17year olds within residential provision within the city has been identified and the current cost of these placements is £2.5m per annum. If these young people can be supported into independence at an earlier stage, then these placement costs can be reduced.

The costs avoided as a result of this initiative will be monitored during the monthly project meetings and a decision will be taken in year 2024-25 to assess whether the savings achieved could support this initiative on an ongoing basis beyond the grant funding.

5.1.3 There are no capital implications.

5.2. Legal Implications

5.2.1 Section 1 of the Localism Act 2011 permits a Council to do anything that an individual may do, whether or not normally undertaken by a local authority (the General Power of Competence). If successful, the Council will be accepting a grant for the delivery of the outcomes specified and compliance with any funding criteria and requirements. The Council would be the accountable body for the funding.

5.2.2 As the accountable body, it is anticipated that the Council will be required to enter into a grant funding agreement with the DFE to govern the terms and conditions of the grant funding. Legal advice will be sought on the terms and conditions of the grant agreement to minimise any risks.

5.2.3 Any procurement will be conducted in compliance with the Council's policy and legal obligations, specifically in compliance with the Council's Contract Procedure Rules and the Public Contracts Regulations 2015 and Subsidy Control Rules and supported by relevant officers.

5.2.4 The acceptance of the grant set out in this report will also support the Council's ability to discharge the following statutory duties:

- Section 23C Children Act 1989 – duties to former relevant children (those who were looked after by the Local Authority)
- Section 23 CZA Children act 1989 (as inserted by Children and Families Act 2014, part 5 (98),) local authorities are required to facilitate, monitor, and support young people in

foster care 'staying put' arrangements until they reach 21 years of age, where this is what they and their foster carers want.

- 5.2.5 Section 2 Children and Social Work Act 2017 provides a requirement for each Local Authority in England to publish a 'Local Offer for Care Leavers'. The Local Offer must contain information about services offered by the Local Authority for care leavers, under the Children Act 1989; and/or made available to assist in or prepare for adulthood and independent living. Coventry's Local Offer will need to be updated if approval is given to accept the grant which will implement the Staying Close Provisions.

6. Other implications

6.1. How will this contribute to the Council Plan (www.coventry.gov.uk/councilplan/)?

The project supports several elements of the Councils Plan, including ensuring young people are safe, improving health and wellbeing, enhancing our duties as Corporate Parents and building upon our Care Leavers offer. It also enables young people leaving residential care to be afforded similar opportunities to those who have the option to 'stay put' with former foster carers.

6.2. How is risk being managed?

Project governance is in place. A project risk register is subject to monthly review, identifying mitigations and actions needed to reduce risks. A key risk identified at the start of the project is sufficient housing offers for young people through the House project, which will impact on the sustainability of the offer beyond the 3-year grant and success of the project. To mitigate this, young people will have the option to move to supported accommodation until a property can be identified, however this creates a further move for them.

6.3. What is the impact on the organisation?

Through the creation of the 4 senior residential workers posts, we are enabled to offer a further tier of career progression to our employees and strengthen our residential workforce and offer. Staying Close, happens informally currently, the offer will ensure we are proactively supporting our young people, strengthening our Care Leavers Offer and is in line with our Corporate Parenting responsibilities.

6.4. Equalities / EIA?

An equality Impact Assessment (EIA) has been completed. The outcome identified that by implementing a 'Staying Close' offer to children leaving residential care as care leavers, we are affording them similar opportunities to children who live in foster care and are able to 'stay put' post 18. The offer is made to all of Coventry's looked after children who live in a residential children's home in Coventry, aged 16+, irrespective of whether they live in a home run by the council or through a commissioned placement.

We are also ensuring that our care leavers are enabled to maintain positive relationships with their carer's, as a child leaving home at 18 may do with their parents/ families.

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

There are no apparent negative impacts on environmental/ climate change or the carbon footprint because of this project. Young people will be supported to recycle, understand energy efficiency and conserving water.

6.6. Implications for partner organisations?

By proactively offering additional support to our carer leavers moving on from a residential children's home, we will aspire to reduce the impact on other agencies by enabling young people to make positive life choices, access education and employment, maintain their tenancies, be positive members of their communities and support them in meeting their health and emotional wellbeing needs.

Young people will be signposted to relevant agencies for support as appropriate.

Report author:

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Contributor/approver name	Title	Service Area	Date doc sent out	Date response received or approved
Contributors:				
Lara Knight	Governance Services Co-ordinator	Law and Governance	21/09/2022	21/09/2022
Names of approvers for submission: (Officers and members)				
Finance: Tina Pinks	Finance Manager	Finance	12/09/2022	
Legal: Nancy Perkins	Case Management Team Leader	Law and Governance	12/09/2022	20.09.2022
Director: John Gregg	Director of Children's Services	-	27/09/2022	27/09/2022
Members: Councillor P Seaman	Cabinet Member for Children and Young People		27/09/2022	27/09/2022

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Public report

Cabinet

A separate report is submitted in the private part of the agenda in respect of this item, as it contains details of financial information required to be kept private in accordance with Schedule 12A of the Local Government Act 1972. The grounds for privacy are that it contains information relating to the financial and business affairs of any particular person (including the authority holding that information). The public interest in maintaining the exemption under Schedule 12A outweighs the public interest in disclosing the information.

Cabinet

11 October 2022

Name of Cabinet Member:

Cabinet Member for Children and Young People - Councillor P Seaman

Director approving submission of the report:

Director of Childrens Services

Ward(s) affected:

None

Title:

Capital scheme for Children's home offering same day/short-term placements

Is this a key decision?

Yes - the proposals involve financial implications in excess of £1m per annum.

Executive summary:

The Council wishes to establish an additional Children's home, offering same day/short-term provision. This will be funded via acceptance of a Department for Education (DfE) Capital Grant, which will also require match funding of 50% capital borrowing by Coventry City Council. Should the DfE Capital Grant bid not be successful then 100% capital borrowing will be required to fund the project.

A sufficiency needs analysis is a requirement of section 22G of the Children Act 1989 and statutory guidance was issued in 2010. A recent analysis in Coventry has identified the need for additional provision offering same day/short-term care for children in Coventry.

For some children and their families, additional time/space is needed whilst a wrap-around offer of support can be put in place or, due to level of need/trauma, some may require longer-term residential care as a looked after child.

Coventry City Council currently operates 4 Children's homes for up to 16 looked after children and commissions an additional 12 placements with private providers within the city. Based upon the Ofsted registration of these homes, and others within the city, a placement offer cannot be made to children who require accommodating at short notice or for a short period of time.

Working across children's services, finding the right placement at the right time, despite being part of a regional framework can be a significant challenge due to current market pressures, particularly for unplanned placements. Therefore, we are often reliant on spot contract providers who may inflate costs of the placement due to the urgency to meet the child's immediate needs.

Nationally this has been acknowledged by the Department for Education (DfE) which has recently announced an initiative to match any capital funding required to enable local authorities to open and run its own provision. An application has been made and the service is currently waiting for a decision.

The current proposal is to purchase and refurbish a privately owned residential property to offer this provision. This will enable children to live locally whilst assessment and appropriate support is put in place which enables improved outcomes for children needing a same day/short-term provision.

Recommendations:

Cabinet is recommended to:

1. Approve the acceptance of a DfE grant if awarded which will be utilised towards the commissioning and provision of an additional children's home.
2. Approve capital expenditure of up to; -
 - a. The sum as specified in the private report to be met from prudential borrowing in the event the grant is successful, or,
 - b. In the absence of the DfE grant award, the sum as specified in the private report to be met from prudential borrowing.
3. Delegate authority to the Director of Children's Services following consultation with the Chief Operating Officer and the Chief Legal Officer to; -
 - a. negotiate final terms and approve entry into any grant funding agreement
 - b. secure the DfE funding with the City Council acting as the Accountable Body for the funding as well as any other agreements required to bring into effect the recommendations set out in this report.
4. Delegate authority to the Director of Children's Services following consultation with Chief Operating officer and Chief Legal Officer to undertake the necessary due diligence to identify and purchase a property that can be used for the purpose of a short-stay children's home.

List of Appendices included:

None

Background papers:

None

Other useful documents

DCSF 2010 – Sufficiency Statutory guidance on securing sufficient accommodation for looked after children

[sufficiency_statutory_guidance_on_securing_sufficient_accommodation_for_looked_after_children.pdf \(publishing.service.gov.uk\)](https://www.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/534560/sufficiency_statutory_guidance_on_securing_sufficient_accommodation_for_looked_after_children.pdf)

Sir Martin Narey 2016 - Independent review of children’s residential care [England]

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/534560/Residential-Care-in-England-Sir-Martin-Narey-July-2016.pdf

Josh MacAlister, Chair of the independent review of children’s social care - Transforming Care

<https://childrensocialcare.independent-review.uk/wp-content/uploads/2022/05/Transforming-care.pdf>

CMA March 2022 - Children’s social care market study

<https://www.gov.uk/government/publications/childrens-social-care-market-study-final-report>

Has it or will it be considered by scrutiny?

No

Has it or will it be considered by any other council committee, advisory panel or other body?

Yes

This matter will be submitted to the Corporate Parenting Board on Thursday 3rd November 2022

Will this report go to Council?

No

Report title: Capital scheme for Children’s home offering same day/short-term placements

1. Context (or background)

- 1.1. A sufficiency needs analysis is a requirement of section 22G of the Children Act 1989 and statutory guidance was issued in 2010. A recent analysis in Coventry has identified the need for additional provision offering same/day/short-term care for children in Coventry.
- 1.2. For some children and their families, additional time/space is needed whilst a wrap-around offer of support can be put in place or, due to level of need/trauma, some may require longer-term residential care as a looked after child.
- 1.3. The sufficiency analysis has identified the need for additional provision offering same day/short-term for children in Coventry. This analysis is reinforced by a recent report by the Competition and Markets Authority (CMA) which undertook an examination of the market on behalf of the Government.
- 1.4. A full report was published in March 2022. It found that there was a shortage of appropriate children’s home placements, that the largest market providers could be earning higher profits than the CMA would expect in a well-functioning market. The report highlighted the risk of private equity owned providers going into financial distress and ultimately having to exit the sector due to high and increasing levels of debt.

2. Options considered and recommended proposal

- 2.1. Coventry is already a provider of children’s home provision registered with Ofsted. It is proposed that Coventry City Council now opens an additional home that is supported by partner agencies e.g., Health, and investigates the feasibility of exploring the purchase and refurbishment of a privately owned residential property for children needing a same day/short-term placement to meet the identified gap in provision. This will future proof the Council from excessive placement costs caused by market swings such as those experienced throughout the Covid-19 pandemic and the expected economic downturn due to the current cost of living crisis.
- 2.2. The home sets out to address known/experienced placement challenges. The residential team will work closely with families, partners and wider services to enable children to safely return home whenever possible or onto more permanent and appropriate placements based on their individual needs and welfare.
- 2.3. A primary function of the home will be to respond to potential unplanned admissions to care, which can include:
 - When the Police have exercised their powers of protection in respect of a child and request the local authority receive the child
 - Discharges from hospital relating to mental health & emotional well-being where

there is no longer a need to remain in hospital following CAMHS assessment, but they require additional support before returning home, planned fostering or residential therapeutic care

- PACE beds - preventing children from remaining in custody overnight, when no alternative placement can be found in the region
 - For children remanded into the care of the Local Authority when no alternative placement can be found in the region
 - Critical family relationship breakdowns (particularly for adolescents), enabling time & space whilst intensive restorative work is undertaken and/or FGC completed to look at alternatives to becoming long-term 'looked after'
 - Children who need long-term foster placements within Coventry or for siblings, which cannot be accessed at short notice
 - Placement stability- 'respite' for children in foster placements who may be in crisis, working closely with carers and the wider services such as Edge of care, Horizons to create a solution focused plan that enables the child to return to live with their carers
 - 'Respite' for single parent/carer who is admitted to hospital in an emergency and where no alternative care for the child is available
- 2.4. Working closely with the Placement Team stringent 'gate keeping' will be needed to ensure that children do not remain living within the home for a long period of time. Whenever possible and appropriate we will still seek to place children within a foster placement in Coventry and enabling further time to plan for these placements, will mean less children are placed 'at a distance'.
- 2.5. Given the significant market pressure when we are in need of a same day placement, we often have limited choices and can be required to commission spot placements at high costs.
- 2.6. Several options have been considered to meet the identified provision gap. These are:
1. Accessing the private market- consideration of a specific block contract for 'hard to place' children and commissioning further provision from the market or providing the provision internally.
 2. Use of the private market- there is currently no private provision of this type in the city and there is no indication that this situation is likely to change. There are however out of city placements that are usually high-cost and involves the child moving away from Coventry's key services, family and friends.
 3. Use of existing block contract- there has been some discussion with Coventry City Council's block providers to explore whether they are able to expand provision into this area. However, both providers have indicated that they do not have the capacity or structure to run homes for children needing same day/short-term crisis intervention within the city.

4. Commissioning further provision from the market- the cost of external residential placements made by Coventry have increased by 32% in the 5 years since 2017/18. A short-term residential home will help Coventry drive value by reducing its reliance on this market.
 5. Expanding internal provision- Coventry has a good track record in opening and running children's home provision. It currently runs 5 children's homes, for children who need medium to long term residential care. Coventry has experience of opening and running good quality children's homes within the city. In addition, the DfE has created an initiative to local authorities that want to open their own provision to meet need and to match capital funding. An application has been made to the DfE to match fund the capital provision requested to be invested by Coventry City Council.
 6. The analysis of options indicates that providing internal children's homes is the best option for ensuring high quality provision that meets the needs of children within the city boundary. Combining with partner agencies such as Health, we can offer same day/short-term provision for children within the Coventry area and build upon the success of our Reunification Project & Edge of care services.
 7. The plan is to purchase and refurbish a privately owned residential property for children needing a same day/short-term placement to meet the identified gap in provision.
 8. This makes use of the DfE match capital funding available, in line with the delivery timelines within the grant [March 2025]. We have clear project plans in place which will enable the us to provide further in-city, in-house provision for looked after children.
- 2.7. As part of the bid process a review of suitable properties for sale within Coventry was undertaken on 18 August 2022. Seven properties were identified as being potentially suitable, subject to visits and surveys.
 - 2.8. Although the home will be established to house up to four young people at any one time, the property purchased will need to be a 5+ bedded home and have sufficient space for the home's requirements.
 - 2.9. The new short-term residential home will provide real value by giving the service extra time to put support in place and find the most appropriate placement; whether to remain at home with family, enter foster care or enter a more suitably matched residential or another placement.
 - 2.10. As well as significant immediate financial benefits, there are also longer-term ones associated with better matched placements that lead to reduced placement breakdown and escalation of costs, plus better education and health outcomes. This along with improved outcomes for young people demonstrates the strong value of a short-term provision.

3. Results of consultation undertaken

- 3.1. There have been continuous discussions with young people, their families, partner agencies and organisations representing families who have looked after children or are on the edge of becoming looked after. There is overwhelming feedback that there needs to be more local provision for families and their children who may be in crisis. When needing an urgent placement, due to lack of placement sufficiency within the city, some have had to move considerable distances to be placed in a foster home or residential children's home that can meet their needs.
- 3.2. When children are enabled to remain in Coventry, we can undertake intensive work with them and their families with the aspiration for them to return home if safe to do so. This is challenging if a child is placed a significant distance from the city and we are then unable to engage with them through relational based practice to find mutually agreed solutions to resolve/decrease any safeguarding concerns.
- 3.3. All feedback has underlined the benefit of young people remaining in the city where their families can be better involved in the child's care planning and local professionals work together to meet the child's needs. This will contribute to better outcomes for the child who is placed in the city.
- 3.4. In addition, there will be better outcome efficiencies for Children's Services. Having children closer to the city will mean that there will be wider savings in transportation and social worker time. It will be easier and quicker to visit children who are based in our own homes. Staff at the home will use the same recording system as the allocated social worker meaning that communication is more efficient, and the needs of children can be identified more easily and met more quickly.
- 3.5. Working closely with Health, we have seen a significant rise in the number of children who present at hospital with mental health & emotional wellbeing needs, many of whom do not have a medical need and, following CAMHS assessment, are deemed fit for hospital discharge.
- 3.6. Through discussions with Health, we have established joint daily 'Bronze' and weekly 'Silver' escalation meetings to ensure children move on as quickly as possible. However, for some children and their families, we have agreed that additional time/space is needed whilst a wrap-around offer of support can be put in place or, due to level of need/trauma, some may require longer-term residential care as a looked after child.
- 3.7. Additionally, some foster carers have told us that they find self-harming behaviours difficult to manage. We will support the carers of children who are already looked after who may be presenting with self-harming behaviours or mental health concerns with 'respite', to prevent potential placement breakdown and ensure children achieve permanency.

4. Timetable for implementing this decision

- 4.1. Once approved the search for an appropriate property will begin immediately. Coventry City Council is now waiting for a decision from the DfE. There are specific requirements regarding completion of provision attached to the DfE grant. These will be monitored regularly through a project management group, chaired by the Strategic Lead for Looked after Children and oversight by operational staff including finance and property services colleagues. There will be regular reports on progress to the Lead member for Children's Services and Corporate Parenting Board. The aim is for the proposed home to be operational by October 2023.

5. Comments from Chief Operating Officer (Section 151 Officer) and Director of Law and Governance

- 5.1. Financial Implications

Capital funding

- 5.1.1. The Council intends to purchase and renovate a residential property to open a children's home. This home will offer same day/short term placements for children needing a crisis provision. The total capital outlay needed to undertake this work has been estimated at a sum as stated in the private report based upon current suitable property market prices and previous experience of opening 3 previous homes and the financial implications associated with this.
- 5.1.2. In September 2022, a bid was made to the DfE under its Children's Home Capital Fund programme for this capital project to be 50% match funded. If the Council's bid is successful, the DfE will contribute up to the amount as stated in the private report towards the capital work and the Council will fund the balance from prudential borrowing.
- 5.1.3. If the bid for DfE capital grant is unsuccessful the Council will seek to fund the entire capital project costs from prudential borrowing which is stated in the private report

Revenue funding

- 5.1.4. Many of the Council's highest costing placements have been made in emergency situations where only one provider is found. Despite the high cost, the placement is often ill equipped to meet all the needs of the young person. There is often no other option due to a lack of crisis/short term provision in the City.
- 5.1.5. A new short-term residential home will provide real value by giving the service extra time to put support in place and find the most appropriate placement; whether to remain at home with family, enter foster care or enter a more suitably matched residential or another placement.
- 5.1.6. Coventry has more than 80 looked after children placed in residential homes. Over 80% of those are placed with external providers, showing how heavily reliant Coventry is on the external market.

- 5.1.7. The cost of external residential placements made by Coventry have increased by 32% in the 5 years since 2017/18. A short-term residential home will help Coventry drive value by reducing its reliance on this market.
- 5.1.8. The annual operational costs of the new home have been determined and includes day, waking night, administration, and management staff, in addition to other running costs such as groceries, trips and utility costs.
- 5.1.9. At the 75% anticipated occupancy rate, equivalent to 3 out of 4 beds being occupied, the effective bed cost is more expensive than the average cost of a standard residential bed. However, the following need to be considered:
- The short-term home is of a specialist nature, with high staffing levels and waking night staff
 - The cost of many crisis placements far exceeds the average standard rate
 - The home will act as a mechanism for preventing entries to care or finding better matched placements, avoiding significant placement costs
 - At 75% occupancy and an average length of stay of 4 weeks, the home could accommodate up to 40 stays per year.
- 5.1.10. A review of 14 potentially suitable young people for the home was undertaken. The young people were in Edge of Care, Through Care and Youth Justice service areas. Of the 14, it was determined that 5 could have been prevented from entering residential placements if a short-term home was available. This would have avoided costs sufficient to fund the running costs of the short-term residential home.
- 5.1.11. As well as significant immediate financial benefits, there are also longer-term ones associated with better matched placements that lead to reduced placement breakdown and escalation of costs, plus better education and health outcomes. This along with improved outcomes for young people demonstrate the strong value of a short-term provision.

5.2. Legal Implications

- 5.2.1. The Council has a general duty to looked after children under section 22 (3) of the Children Act 1989 to safeguard and promote their welfare. Additionally, section 22G of the Children Act 1989 (section 9 of Children and Young Persons Act 2008) requires the Council to secure, where reasonably practicable, sufficient accommodation for looked after children and those whose circumstances make it consistent with their welfare to provide them with accommodation within their local authority area.
- 5.2.2. To ensure compliance with the statutory requirements under the Children's Homes (England) Regulations 2015, governance around the operation of the children's home will be required to ensure a registered manager is appointed to oversee the operation of the children's home, as well as appropriate quality assurance arrangements, are in place for monitoring.

- 5.2.3. As defined in Section 1 of the Localism Act 2011, a council is empowered to do anything an individual may do, whether or not normally undertaken by a local authority. If the application for the grant is successful, the Council will accept a grant based on the outcomes specified and in compliance with any of the funding criteria and requirements. It would be the Council that would be held accountable for the funding.
- 5.2.4. Consequently, the Council, as the accountable body, will be required to enter into a grant funding agreement with DFE to govern grant terms and conditions. To minimise any risks, legal advice should be sought regarding the terms and conditions of the grant agreement.
- 5.2.5. It is the responsibility of the Council to ensure that any procurement is conducted in compliance with the Council's policy and legal obligations, including the Contract Procedure Rules, Public Contracts Regulations 2015, and Subsidy Control Rules. This will be facilitated by relevant officers.

6. Other implications

6.1. How will this contribute to the Council Plan (www.coventry.gov.uk/councilplan/)?

The initiative will contribute to the Council plan in the following ways:

- 6.1.1. Locally committed- the homes will protect some of the city's most vulnerable children, keeping them local to meet their needs and make sure that they continue to have regular involvement with their family and services. It will engage local partners so that the health and wellbeing of this group of children will be significantly improved.
- 6.1.2. Delivering our priorities with fewer resources- the opening of an additional home will make savings on the Children's Services Placements budget. This has been demonstrated through an effective cost/benefit analysis and business case. It will add social value to the communities in which the homes are located. The needs of children are at the heart of this initiative.
- 6.1.3. Family Valued- working with the children and families of Coventry, who are in need of short-term intensive support, which may include a short stay for the child within our home to enable restorative and solution focussed work to be completed.
- 6.1.4. Managing performance and managing progress- the home will be subject to significant scrutiny and governance as they are registered with Ofsted. Once registered, the home will be subject to significant quality oversight including monthly assessment by an independent visitor and inspection by regulatory inspectors, Ofsted, in accordance with regulation.

6.2. How is risk being managed?

- 6.2.1. Robust governance processes are proposed that will make sure that any emergent risks are identified and mitigated at the earliest opportunity. The underlying outcome is that children's homes open within agreed timescales. This will include representatives from across the whole of the Council who are involved in the delivery of the project. These will be coordinated by the Strategic Lead for Looked after Children.
- 6.2.2. There is always a level of risk operating a children's home. However, as Coventry has a good track record running children's homes while working closely with Ofsted, it is anticipated that any risks can be ameliorated through robust management and active leadership.

6.3. What is the impact on the organisation?

- 6.3.1. The initiative is a key pillar of the Council's corporate parenting responsibilities. Opening further children's homes in the city will provide children with high quality provision within the city. Operating this home will mean improved placement choice for children with complex needs. The registered manager will work closely with our partners and the wider services to ensure children access the right placement at the right time.

6.4. Equalities / EIA?

- 6.4.1. An Equality Impact Assessment will be completed as part of the business case for a new residential provision.

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

- 6.5.1. The plan to refurbish the new home will take account of all current building regulations and will be 'future proofed' to meet all environmental regulations. There will be close liaison with the Safety, Health, Environment and Quality Manager to identify the best ways of minimising any impact on the environment from any renovations.
- 6.5.2. Coventry City Council has secured ERDF funding towards the installation of Solar PV on the existing residential children's homes, which will commence in October 2023. There is therefore potential to expand the scheme should additional funding be provided as part of the refurbishment project. This would further reduce the carbon emissions associated with the proposed purchase of an additional property.

6.6. Implications for partner organisations?

Partner agencies are required to provide ongoing services to children who are looked after. This includes health services and education provision. Feedback from all partners is that it is easier to deliver high quality services when children remain within to the city. It is anticipated that any new home opened by Coventry City Council will be located within the city boundary. This means partners will be in a

better position to meet children’s needs, improve their health and education outcomes and support families.

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Legal:	Nancy Perkins, Solicitor and team leader	Law and Governance	12.09.2022	16.09.2022
Director: John Gregg	Director of Children’s Services	-		
Members: Pat Seaman	Cabinet Member for	-		

	Children & Young People			

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A separate report is submitted in the private part of the agenda in respect of this item, as it contains details of financial information required to be kept private in accordance with Schedule 12A of the Local Government Act 1972. The grounds for privacy are that it contains information relating to the financial and business affairs of any particular person (including the authority holding that information). The public interest in maintaining the exemption under Schedule 12A outweighs the public interest in disclosing the information.

Cabinet

11 October 2022

Name of Cabinet Member:

Cabinet Member for Adult Services - Councillor M Mutton

Director Approving Submission of the report:

Director of Adult Services and Housing

Wards Affected:

All

Title:

Social Care Reforms: Fair Cost of Care

Is this a key decision?

Yes – the content of this report relates to a decision of a value in excess of £1m and impacts on all wards.

Executive Summary:

This report seeks approval for the use of monies available to the City Council for 2022/23 in respect of the Fair Cost of Care (FCoC) reform.

Fair Cost of Care is one of a series of reforms to Adult Social Care which were contained within the White Paper 'People at the Heart of Care' published in December 2021 with other key reforms including the introduction of oversight of Adult Social Care by the Care Quality Commission from April 2023 and the introduction of a Care Cap and revised charging thresholds from October 2023.

The Fair Cost of Care is the first of the new reforms to be implemented. The primary purpose of the fund is to support local authorities to prepare their markets for reform, including the further commencement of Section 18(3) of the Care Act and to support local authorities to move towards paying providers a fair cost of care. Section 18(3) will allow new self-funders accessing care homes the right to access the same rates that councils pay from October 2023 and existing self-funders by April 2025. DHSC have confirmed that in practice they expect that actual fees to be paid will be 'informed' by the fair cost of care process however fee rates will continue to be based on sound

judgement, evidence and through a negotiation process, as is the case currently. This means there will still be variation in the rates providers are paid to reflect quality, level of service, personalisation and wider market circumstances. The ultimate goal is to achieve a sustainable market.

To comply with the requirements of FCoC the City Council is required to complete a FCoC exercise related to home support for those aged 18 and over and residential/nursing care for people aged 65 and over. The requirement also includes the production of a provisional Market Sustainability Plan (MSP) by October 2022 with a final MSP required by February 2023. The results of the FCoC exercise (in the form of a Cost of Care report) and provisional MSP are required to be submitted to the Department of Health and Social Care (DHSC) by 14 October 2022. Following submission, the returns will be subject to a national review process by DHSC, and once that review process is complete, they will instruct local authorities to publish their cost of care reports. In addition, the Council is required to commit to 'moving towards' a FCoC.

National funding is available for FCoC. This is £152m for 2022/23 rising to £600m for 2023/24 and 2024/25. From the 2022/23 national amount the City Council has received an allocation of £1.047m with future years funding to be allocated pending the outcome of the FCoC exercise nationally. FCoC funding is not expected to contribute to annual increases resulting from inflation or other cost of living expenses, nor the additional costs associated with demographic changes, these existing annual changes are expected to be met from other local authority resources. For the City Council to receive any future years funding we are required to comply with the FCoC requirements of DHSC.

As the outcome of the process is not confirmed until the subsequent review by DHSC, the draft outcome for submission is contained within the private report, and will be made public in line with DHSC guidance. There is the option to reduce or close any gap by contributing additional City Council resource to the FCoC but given the challenging position of local government finances and the fact that the introduction of FCoC is an additional burden as a result of government policy, using additional council resources to fund FCoC is not recommended. The Council is nevertheless required to determine how the resource available for 2022/23 is used to support moving toward a FCoC. There is further work to be done including further engagement with adult social care providers, to enable finalisation of the MSP by February 2023 in order to understand the impact of this funding difference in the context of the local care market.

Cabinet is recommended to:

1. Approve that the FCoC funding provided be used to fund an additional increase for eligible contracted providers of home support for adults aged 18 and over, and residential/nursing care for people aged 65 and over for 2022/23 where the price paid is less than the FCoC. This represents an additional fee increase of circa 3%
2. Delegate authority to the Director of Adults Services and Housing, following consultation with Cabinet Member for Adults, to finalise the Market Sustainability Plan for February and submit the final report, subject to any further guidance received, by the submission date
3. Support submission of the Cost of Care reports detailing how the exercise was completed, the results of the exercise and how the resource available for 2022/23 will be used
4. Support the FCoC reform intent to move towards paying social care providers a Fair Cost of Care using govt resources provided to fund this reform

List of Appendices included:

Appendix One: Equality Impact Assessment

Appendix Two: Provisional Market Sustainability Plan (included in private report)

Appendix Three: Cost of care reports (included in private report)

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?

No

Will this report go to Council?

No

Report title: Social Care Reforms: Fair Cost of Care

1. Context (or background)

1.1 There is an ambitious reform agenda for Adult Social Care as encapsulated in the December 2021 White Paper 'People at the Heart of Care' which set out three broad policy objectives for Adult Social Care to be delivered over the next ten years, these being:

- People have choice, control, and support to live independent lives
- People can access outstanding quality and tailored care and support
- People find adult social care fair and accessible

1.2 The White Paper also introduced a series of reforms to Adult Social Care including:

- The introduction of a FCoC. This reform is to support local authorities to prepare their markets for reform, including the further commencement of Section 18(3) of the Care Act and to support local authorities to move towards paying providers a fair cost of care.
- The introduction of oversight of Adult Social Care by the Care Quality Commission from April 2023.
- The introduction of the care cap whereby, from October 2023, an £86k "cap" on the amount that anyone over 18 will pay for their care during their lifetime is due to be in place.
- The introduction of revised contribution thresholds from October 2023 where the upper capital asset threshold will increase from £23,250 to £100,000; with the lower threshold increasing from £14,250 to £20,000.

1.3 This report is concerned with the implementation of the FCoC as the first reform to be implemented. The implementation of other reforms will be the subject of future reports as required.

1.4 Fair Cost of Care

1.5 The purpose of the Fair Cost of Care reform is to support local authorities to prepare their markets for reform, including the further commencement of Section 18(3) of the Care Act and to support local authorities to move towards paying providers a fair cost of care. Section 18(3) will allow new self-funders accessing care homes the right to access the same rates that councils pay from October 2023 and existing self-funders by April 2025.

1.6 FCoC is concerned with how much it **costs** to deliver care, not the **price** of care. The FCoC is based on the April 2022 position and is not expected to contribute to annual increases resulting from inflation or other cost of living expenses, nor the additional costs associated with demographic changes, these existing annual changes are expected to be met from other local authority resources. The government definition of FCoC also recognises the responsibility of local authorities 'in stewarding public money, including securing best value for the taxpayer'.

1.7 The FCoC does not apply to all social care providers at this point. The current scope is all home support providers catering for Adults aged 18 and above and residential/nursing care home providers supporting people aged 65 and over. The FCoC exercise is open to all providers in these categories whether they contract with the City Council or not however

there is no mandatory requirement for providers of social care to participate in the data gathering stage of the FCoC exercise. There is no specified date for when the FCoC exercise will apply to other elements of the social care market.

- 1.8** For Coventry, the number of providers included in the FCoC exercise were 47 Older People Care Homes contracted with the City Council, who, as at 10 August 2022 were supporting 1580 people in the city. It should be noted that the Council currently has contracts with all 47 homes. For home support the FCoC applies to 48 registered home support providers supporting 2910 people, of which the City Council contracts with 16 of these providers. The number of people supported is subject to change on a daily basis.
- 1.9** In order to comply with the FCoC reform local authorities are required to undertake an exercise to calculate the gap between the current average price paid for care and the median cost to providers of social care and support for delivering that care. In order to support this exercise, the Local Government Association (LGA) provided two national costing tools, one for care homes and one for home support to be used by care providers to detail their costs of providing care. The costing tools enable a breakdown of the different cost elements required to deliver a service including staffing costs, service volume delivered, premises costs, back-office costs, travel time for home care, and rates of return. Once completed, the costing tools generates either an hourly home rate for home support or a weekly cost per person for care homes.
- 1.10** To comply with FCoC requirements the City Council is required to submit the following to the Department of Health and Social Care (DHSC) by 14 October 2022.
- 1.11** Cost of Care Report (Appendix 1 – Private Report) – A document transparently setting out the approach to data collection, analysis and reported results. Separate documents are required for home support and care homes.
- 1.12** Provisional Market Sustainability Plan (Appendix 2 – Private Report) – This document is required to outline the current market position, risks to the sustainability of the market (including the assessment of risk of social care reforms) and plans to support the market in ensuring quality and sufficiency. There is an opportunity for local authorities to assess the impact that current fee rates are having on their market and potential future risks, particularly in the context of adult social care reform. The MSP, once complete is expected to support decision making on how funding will be used to address any sustainability challenges. The current status of the MSP is 'draft' with a final MSP to be submitted in February 2023.
- 1.13** The submission of a satisfactory Cost of Care report and provisional Market Sustainability Plan to DHSC by 14 October 2022 and a final Market Sustainability Plan by February 2023 are conditions for the City Council to receive future years funding for FCoC. Within this the Council is required to make a commitment to how the Council will move towards payment of the FCoC as part of our 2023/24 budget setting process. There is however no timescale stipulated for the delivery of this commitment as it is recognised by DHSC that moving towards represents a journey and that different local authorities are at different points from the median figure calculated., coupled with the fact that the future years allocation of FCoC is unknown.
- 1.14** The FCoC conditions will require that local authorities publish their Cost of Care reports and final Market Sustainability plans. Publication of the cost of care reports is subject to a review process by DHSC. Once this process is complete DHSC will instruct local authorities to publish the outcome. Publication dates of the final MSP are yet to be confirmed.

1.15 Completing the Fair Cost of Care exercise

1.16 The national toolkit for home support providers became available on 28 March 2022 and 25 May 2022 for residential care homes. The initial closing dates for toolkit submissions to the City Council were set as 13 June 2022 and 11 July 2022 respectively, however, to maximise the number of returns received, these were extended.

1.17 Prior to the toolkits becoming available the City Council engaged with local care providers to encourage participation in the exercise. This included market engagement sessions to clarify understanding, providing a specific email address for providers queries, issuing regular updates and making information available through the Council's website. There were also national webinars facilitated for providers to attend on how to complete the toolkits.

1.18 At the closing date for submissions the response rates for complete returns were as follows:

- Home care – 11 submissions from a possible 48 (23% rate of return for the total market)
- Residential – 18 submissions from a possible 47 (38% rate of return for the total market)

1.19 Following the closing date all submissions were reviewed to identify any inputting errors, significant outliers and areas requiring further clarification which were raised with providers as appropriate. Where possible additional data sources were used to verify the information provided, including data held by the council (such as financial data and information on commissioned packages of support) national data (such as the national capacity tracker) and data available in the public domain (such as companies house accounting information).

1.20 Outcome of the Fair Cost of Care Exercise and Next Steps

1.21 The detailed outcome of the fair cost of care exercise remains subject to DHSC review processes prior to publication and is therefore included in the private report.

1.22 The outcome of the FCoC exercise, based on returns to date and the completion of the process described above did identify a gap between the current price paid by the City Council and the median rate identified in the process based on the provider returns received.

1.23 In considering the implications of this gap it should be noted that additional DHSC guidance received on 25 August 2022 states that *'the outcome of the cost of care exercise is not intended to be a replacement for the fee setting element of local authority commissioning processes or individual contract negotiation'*. and that *'fee rates will also continue to be based on sound judgement, evidence, and through a negotiation process, as is the case currently. As such there will be variation in the rates providers are paid to reflect the quality and level of service'*. The Fair Cost of Care guidance also states that: *'as many local authorities move towards paying the fair cost of care, it is expected that actual fee rates paid may differ due to such factors as rurality, personalisation of care, quality of provision and wider market circumstances'*. Local market circumstances are therefore a factor in determining our approach to FCoC and fee rates moving forward.

1.24 It also needs to be recognised that the process itself is based on the returns received. As returns covering the whole market have not been received this ultimately impacts on the calculated figure and how it compares to the actual market in practice, which includes numerous different operating models. Modelling in this way using a median, and not reflecting the numerous differing levels of complexity and need, oversimplifies what is ultimately a constantly evolving and complex market which is why it can only inform the position rather than define local rates.

- 1.25** Over the period from October 2022 and February 2023 when the final Market Sustainability Plan is due to be submitted further provider engagement will take place, regarding the impact of the gap and to inform how future years FCoC funded allocated to the City Council may be best used to support market sustainability and the policy intentions. To support this work a survey has been undertaken with care homes and home support providers to better understand current challenges with issues of recruitment and retention, costs of travel and utility costs being significant reported factors.
- 1.26** In respect of next steps, alongside the continuing work to finalise the MSP by February 2023 the Department of Health and Social Care will be reviewing local authority FCoC returns in order to assure themselves that local authorities have complied with the reporting requirements outlined in the grant conditions. This review process will cover three areas:
- 1.27** Consistency – whether returns are consistent with DHSC templates and core requirements; whether reports are internally consistent; whether returns are consistent with those of other similar local authorities.
- 1.28** Transparency – whether exercises are evidence-based; whether the approach to key cost lines has been set out; whether plans demonstrate a considered analysis of sustainability challenges and clear strategy to address these in line with the fund objectives; whether market analyses have been undertaken at an appropriate level of detail.
- 1.29** Partnership – whether providers have been given sufficient opportunity to participate in both cost of care exercises and market sustainability planning.
- 1.30** In undertaking this review process the DHSC may contact local authorities to respond to follow up questions about whether exercises sufficiently align with DHSC guidance, and if not agree actions to ensure alignment. The aim is that all local authorities are aware of their position within this review process by the end of November 2022.

2. Options considered and recommended proposal

Compliance with FCoC process is a prerequisite of receiving future years funding, as is supporting the policy intent of ‘moving towards’ a FCoC. As such there are no other options than to comply with the FCoC requirements at this point in time due to negative impact this would have on future funding to support social care through the FCoC.

There are however options to consider in respect of how the FCoC resource available for 2022/23 of £0.982m (£1.047m less £0.065m used for resources to complete the exercise) is deployed and the Council’s position in respect of supplementing this with other resources. These options and recommendation are as follows:

2.1 Option One: Recommended Option

Distribute FCoC funding as an additional 22/23 increase of approximately 3% across all contracted older people care homes and home support providers that are included in the exercise and currently being paid less than FCoC, with no additional City Council resource to be made available in addition to this.

This option would allow an even distribution of funding across the market recognising the cost pressures faced by providers included in the FCoC exercise. Although this option is not necessarily reflective of the differing cost pressures each market faces it is the most equitable option within the financial envelope available and ensures equal support at this point to the sustainability of home support and care homes for older people.

2.2 Option Two: Not recommended

Use FCoC funding to support home support providers only with no additional City Council resource to be made available in addition to this

Using FCoC funding for home support would align with the policy objective of supporting people to remain at home through providing additional financial support to this area. This approach is however not recommended as there is a gap in both home support and residential/nursing care homes. Additionally, although people are supported at home wherever possible there are a number of people for whom care home support is required and we therefore need to also ensure that care homes are also financially supported to be sustainable.

2.3 Option Three: Not recommended

Use FCoC funding to support residential care only with no additional City Council resource to be made available in addition to this

For similar reasons as option two both areas of the market, home support and residential care are essential for an effective care market and a gap exists for both.

2.4 Option Four: Not recommended

Use FCoC funding to increase the rates of the lowest price providers with no additional City Council resource to be made available in addition to this

Such an approach increases the price paid to the lowest priced care providers and in doing so would arguably improve the sustainability of those who may be considered at most financial risk. Whilst this approach supports alignment of rates in the market, there is insufficient evidence at this point to support a decision on where a benchmark for 'lowest price' should be set.

2.5 Option Five: Not recommended

Supplement FCoC funding with City Council resource from 2023/24

Supplementing the government funding with other council resources would accelerate a move to the figure calculated in the exercise. This approach is not recommended as significant additional resource in 23/24 will already be required to be identified based on forecast National Living Rates and other costs still to be met from other Council resources. The introduction of FCoC is a government policy creating an additional (and new) burden on local authorities and as such funding to meet the policy intent should be made available from government and not other existing council resources.

3. Results of consultation undertaken

- 3.1 Engagement regarding the exercise to be completed was carried out with the local provider market as described in paragraph 1.17 above. The templates and information received by providers as part of the process were used to inform the outcome to be reported to DHSC.

4. Timetable for implementing this decision

4.1 Initial returns are required to be submitted to DHSC by 14th October 2022 with the final market sustainability plan due to be completed by February 2023. Publication of the outcome of the exercise will be completed in line with DHSC deadlines which are yet to be confirmed.

5. Comments from the Chief Operating Officer (Section 151 Officer) and Director of Law and Governance

5.1 Financial implications

5.1.1 There is national funding available to support the FCoC which is £152m for 2022/23 from which Coventry's allocation was £1.047m. This national amount increases to £600m for 2023/24 and 2024/25 with the allocation methodology to be determined nationally following the outcome of the FCoC exercise. It was permissible under the grant conditions for up to 25% of the grant to be used to complete the exercise and support engagement with providers. From the Coventry allocation £0.065m (6.2%) has been used to create internal capacity to fund implementation activity associated with meeting the purpose of the FCoC policy meaning a total of £0.982m remains which will be used to support the market.

5.1.2 As part of the gradual implementation of FCoC, the Government will review the funding distribution and conditions ahead of allocating money for 2023/24 and 2024/25 to ensure they remain appropriate to meet the objective of making local markets more sustainable.

5.1.3 The Government will also work closely with local government and care providers to monitor changes in the market as this fund is implemented, providing as much support and oversight to local authorities as is appropriate for Central Government, while respecting their statutory duty under section 5 of the Care Act 2014 to facilitate the efficient and effective operation of local care markets.

5.1.4 There is a gap between the current average fee rates paid and the outcome of the exercise. As highlighted in 1.24 above, the market is both a constantly evolving and complex one and modelling in this way using a median, which does not reflect the numerous differing levels of complexity and need, oversimplifies what is ultimately a constantly evolving and complex position. Whilst as previously outlined the move towards a fair cost of care is both not expected to be immediate, and the FCoC rate is only expected to help inform fee rates which will continue to be based on sound judgement, evidence, and through a negotiation process and subject to local market factors, as part of reporting the outcome to DHSC, there is a requirement to include a calculation of the gap. As this is still subject to review by DHSC, this is included in the private report.

5.2 Legal implications

5.2.1 Section 5 of the Care Act 2014 places a duty on local authorities to facilitate and promote a diverse and high quality market of care and support services (including prevention services) for all people in their local area regardless of who arranges and pays for those services. Local authorities must act with a view to ensuring that there is a range of different services and providers to choose from.

5.2.2 The FCoC exercise is therefore recognised by Government as a key instrument in ensuring authorities are paying a 'fair' rate of care and thus able to facilitate a sustainable, diverse care market in line with our legal requirements. The Government has provided funding and guidance¹ to help local authorities achieve these outcomes.

5.2.3 Within the context of the adult social care reforms, particular consideration is being given to the impact of the further commencement of section 18(3) of the Care Act 2014 (which is

¹ [Market Sustainability and Fair Cost of Care Fund 2022 to 2023: guidance](#), updated 22 August 2022

currently in force for domiciliary (i.e. home) care only) and how sustainability of the local 65+ care home and 18+ domiciliary care markets can be improved. This section of the Care Act 2014 was commenced in relation to domiciliary care in 2015. Local authorities are therefore already required to meet the eligible needs of individuals requiring domiciliary care when requested.

6. Other implications

6.1 How will this contribute to the Council Plan (www.coventry.gov.uk/councilplan/)?

The approach outlined in this report supports the Council Plan by contributing to the following objectives:

- Improving the quality of life for Coventry people
- Improving health and wellbeing
- Protecting our most vulnerable people
- Reducing health inequalities
- Promote the growth of a sustainable Coventry economy
- Delivering our priorities with fewer resources

6.2 How is risk being managed?

There is risk associated with this programme of work. The financial risk is in part mitigated by the allocation of funding from DHSC. The risks associated with social care and market sustainability is managed within the directorate risk register, and the overall Council financial position within the corporate risk register.

6.3 What is the impact on the organisation?

None

6.4 Equality Impact Assessment (EIA)

An EIA has been completed in respect of the FCOC exercise. This demonstrates the potential for positive impacts for people aged 18 and over with disabilities supported through the provision of home support and adults aged 65 and over who are supported in care homes. In relation to race, religion and gender there are expected to be benefits to people with these protected characteristics when supported in the services included in the FCoC exercise. Where benefits are seen it is anticipated that they will accrue through movement towards more sustainable care and support services.

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

None

6.6 Implications for partner organisations?

There may be impacts to NHS organisations in respect of jointly funded support or where the same providers are used by NHS as well as Social Care and fee rates change.

Market sustainability for social care has a significant impact on NHS services and the ICB as an effective social care market can prevent a deterioration in health and supports key health operational objectives including admission avoidance and reducing length of stay in hospital settings.

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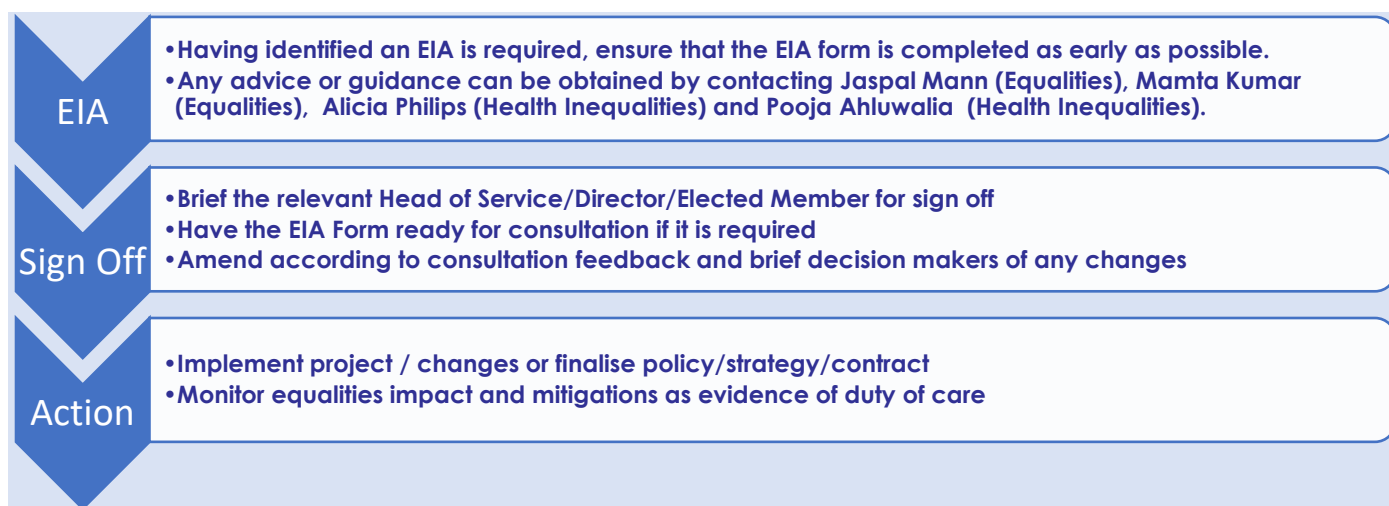
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Julie Newman	Director of Legal and Governance	Law and Governance	14.09.22	16.09.22
Pete Fahy	Director of Adult Services and Housing	Adult Services	13.09.22	14.09.22
Councillor M Mutton	Cabinet Member for Adult Services	-	14.09.22	15.09.22

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APPENDIX ONE – Fair Cost of Care EQUALITY IMPACT ASSESSMENT

Title of EIA		Social Care Reforms: Fair Cost of Care
EIA Author	Name	Chloe Phillips
	Position	Commissioning Officer
	Date of completion	19/8/2022
Head of Service	Name	Jon Reading
	Position	Head of Commissioning and Quality
Cabinet Member	Name	Cllr Mal Mutton
	Portfolio	Adult Services



PLEASE REFER TO [EIA GUIDANCE](#) FOR ADVICE ON COMPLETING THIS FORM

SECTION 1 – Context & Background

1.1 Please tick one of the following options:

This EIA is being carried out on:

- New policy / strategy
- New service
- Review of policy / strategy
- Review of service
- Commissioning
- Other project (*please give details*)

1.2 In summary, what is the background to this EIA?

As part of the [People at the Heart of Care: adult social care reform white paper](#), local authorities are required to complete a [Fair Cost of Care](#) (FCOC) exercise to arrive at a shared understanding with providers of the local cost of providing care. In addition, authorities are required to publish a Market Sustainability Plan detailing how they plan on working towards the fair cost of care (where this is not already being paid) over the next 3 years.

In undertaking the exercise, local authorities will be looking to identify the lower quartile, median and upper quartile costs in the local area for the following care categories:

- 65+ care homes
 - standard residential care
 - residential care for enhanced needs
 - standard nursing care
 - nursing care for enhanced needs
- 18+ domiciliary care (home support – excluding short term or reablement provision).

The Department of Health consider the median cost of care across the market to be the 'Fair Cost' and has indicated they will provide additional funding over the next few years to **move towards** this fair cost where local authorities are paying below this rate.

Whilst the exercise is not a mandatory requirement for providers, all providers who are registered to deliver the above care in Coventry have been invited to participate, regardless of whether they contract with the City Council. Participating providers are required to submit their costs via the nationally commissioned tools for the exercise; [IESE](#) supply the tool for care homes and [CHIP](#) the toolkit for domiciliary care.

Coventry City Council have been allocated an initial fund of £1.047million to assist in moving towards the payment of the established “fair” cost. Future funding allocations for the exercise are yet to be announced, however will be conditional on the completion of the following requirements by the 14 October 2022:

- cost of care exercises for 65+ care homes and 18+ domiciliary care
- a provisional market sustainability plan – a final plan to be submitted in February 2023
- a spend report detailing how funding allocated for 2022 to 2023 is being spent in line with the fund’s purpose

All decisions and funding allocations in respect of the exercise will be made following approval in line with CCC governance procedures.

1.3 Who are the main stakeholders involved? Who will be affected?

- Coventry City Council
- Integrated Care Board (ICB)
- Residents / service users
- LGA (Local Government Association)
- ADASS (Directors of Adult Social Services)
- DHSC (Department of Health and Social Care)

- Neighbouring local authorities e.g. Solihull, Warwickshire

1.4 Who will be responsible for implementing the findings of this EIA?

- Coventry City Council

SECTION 2 – Consideration of Impact

Refer to guidance note for more detailed advice on completing this section.

In order to ensure that we do not discriminate in the way our activities are designed, developed, and delivered, we must look at our duty to:

- Eliminate discrimination, harassment, victimisation, and any other conflict that is prohibited by the Equality Act 2010
- Advance equality of opportunity between two persons who share a relevant protected characteristic and those who do not
- Foster good relations between persons who share a relevant protected characteristic and those who do not

2.1 Baseline data and information

Please include a summary of data analysis below, using both your own service level management information and also drawing comparisons with local data where necessary (go to <https://www.coventry.gov.uk/factsaboutcoventry>)

As above, the FCOC exercise only covers care homes catering for people aged 65 and over and home support (domiciliary care) care providers providing support for those aged 18 years and over. Data taken from the Capacity Tracker (a national database that adult social care providers are legally required to update) indicates the following number of people were in receipt of a service as of 31 August 2022 (regardless of funding source) and therefore potentially affected by this exercise:

- 2910 people receive a home support service in the City
- 1586 people living in a 65+ care home

The exercise itself will not impact service users directly but any implementation of increased fee rates may indirectly serve to improve service user experience through improved financial sustainability of care provision helping to support continuity of care received, quality and outcomes provided.

General Data: Coventry City Population and Workforce

Age

The number of older people within the City is increasing, with this group expected to accelerate and outpace other groups. Coventry City Council [population and demographics](#) data indicates there are 50,463 people aged 65+ in Coventry, around 13% of Coventry's population. By 2029, the City should expect to have an additional 8900 people aged over 65 and an additional 2000 aged over 85.

Coventry also has an aging workforce; the average age of a worker in adult social care is 43 years; 67% are aged between 25-54, 23% above 55 and only 10% are under 25%.

Diversity

33% of Coventry's population are BME, with the city expected to become even more diverse; half of Coventry pupils (52%) are from BME backgrounds. In respect of Coventry's social care workforce, 31% of individuals are from a BME background. 16% of the workforce are male.

2.2 On the basis of evidence, complete the table below to show what the potential impact is for each of the protected groups.

- Positive impact (P),
- Negative impact (N)
- Both positive and negative impacts (PN)
- No impact (NI)
- Insufficient data (ID)

**Any impact on the Council workforce should be included under question 2.6 – not below*

Protected Characteristic	Impact type P, N, PN, NI or ID	Nature of impact and any mitigations required
Age 0-18	NI	The exercise does not cover this age group
Age 19-64	P	Moving towards a “fair” and more sustainable rate for care should have benefits for the social care market, including encouraging investment and innovation: this may contribute to a greater range and flexibility of services available which can better meet individual or specific care needs. The policy should increase the financial sustainability of providers thus ensuring continuity of care and resultant better outcomes
Age 65+	P	Moving towards a “fair” and more sustainable rate for care should have benefits for the social care market, including encouraging investment and innovation: this may lead to a greater range and flexibility of services available which can better meet individual or specific care needs. The policy should increase the financial sustainability of providers thus ensuring continuity of care and resultant better outcomes
Disability	P	As the policy is specifically targeted at certain types of care and certain age groups, it should provide positive benefit to some people with a disability but not all. Supporting disabled people to meet their care needs will advance equality of opportunity between disabled and non-disabled people.

		<p>Moving towards a “fair” and more sustainable rate for care should have benefits for the social care market, including encouraging investment and innovation: this may lead to a greater range and flexibility of services available which can better meet individual or specific care needs.</p> <p>The policy should increase the financial sustainability of providers thus ensuring continuity of care and resultant better outcomes</p>
Gender reassignment	NI	The policy is aimed at specific types of care and age ranges and is provided irrespective of gender status
Marriage and Civil Partnership	NI	The policy is aimed at specific types of care and age ranges and is provided irrespective of marriage and civil partnership
Pregnancy and maternity	NI	The policy is aimed at specific types of care and age ranges and is provided irrespective of pregnancy and maternity
Race (Including: colour, nationality, citizenship ethnic or national origins)	P	<p>This policy is expected to impact this group positively.</p> <p>Supporting this group to meet their care needs will advance equality of opportunity between disabled and non-disabled people.</p> <p>Moving towards a “fair” and more sustainable rate for care should have benefits for the social care market, including encouraging investment and innovation: this may lead to a greater range and flexibility of services available which can better meet individual or specific care needs.</p> <p>The policy should increase the financial sustainability of providers thus ensuring continuity of care and resultant better outcomes</p> <p>There is some evidence that some ethnic groups may be more likely than others to have care needs. For example, disability-free life expectancy is lowest for Pakistani and Bangladeshi groups https://www.gov.uk/government/publications/build-back-better-our-plan-for-health-and-social-care/adult-social-care-charging-reform-public-sector-equalities-duty-impact-assessment and health-related quality of life score for older adults are lower amongst many ethnic minority groups relative to the White British group, according to the 2017 GP patient survey https://www.gov.uk/government/publications/build-back-better-our-plan-for-health-and-social-care/adult-social-care-charging-reform-public-sector-equalities-duty-impact-assessment. By supporting those with care needs to access appropriate and affordable care, this policy may have particular benefits for some ethnic groups and thereby encourage equality of opportunity for those who share a protected characteristic and those who do not.</p>

		<p>People from BAME communities form 31.4% of the social care workforce (source WM ADASS). The Council will work to ensure that at least a proportion of any fee rate increases are passed on to the workforce thus having a positive impact on wages.</p>
Religion and belief	P	<p>This group could be impacted positively</p> <p>We know that some people with different religions or beliefs may have different social care needs. For example, some people may face language or cultural barriers to accessing services, while other people may have special dietary requirements or needs to mark religious days in particular ways</p> <p>Moving towards a “fair” and more sustainable rate for care should have benefits for the wider social care market, including encouraging investment and innovation: this may lead to a greater range and flexibility of services available which can better meet individual or specific care needs for certain religious groups.</p>
Sex	P	<p>This policy does not treat people differently based on their sex or gender. However, there are various factors which may mean that women are more likely to benefit from the support this policy offers, and that this policy will thereby promote equality of opportunity between these 2 groups.</p> <p>Women are more likely than men to be disabled. In the 2019 to 2020 Family Resources Survey, 24% of females reported having a disability compared to 19% of males. Across all age groups except those below aged 15, a higher proportion of females than males reported that they were disabled.</p> <p>Office for National Statistics (ONS) indicate that women’s lifetime earnings are substantially lower than men’s: in 2018 women received, on average, equal to 59% of men’s lifetime earnings. This means that they are likely to have less certainty over how they will meet the costs of their future care needs and will be particularly likely to benefit from this policy.</p>
Sexual orientation	NI	<p>The new policy is aimed at specific types of care and age ranges and is provided irrespective of sexual orientation.</p>

HEALTH INEQUALITIES

<p>2.3</p>	<p>Health inequalities (HI) are unjust differences in health and wellbeing between different groups of people which arise because of the conditions in which we are born, grow, live, work and age. These conditions influence our opportunities for good health, and result in stark differences in how long we live and how many years we live in good health.</p> <p>Many issues can have an impact: income, unemployment, work conditions, education and skills, our living situation, individual characteristics, and experiences, such as age, gender, disability, and ethnicity</p> <p>A wide range of services can make a difference to reducing health inequalities. Whether you work with children and young people, design roads or infrastructure, support people into employment or deal with welfare benefits – policy decisions and strategies can help to reduce health inequalities</p> <p>Please answer the questions below to help identify if the area of work will have any impact on health inequalities, positive or negative.</p> <p>If you need assistance in completing this section please contact: Alicia Philips or Pooja Ahluwalia in Public Health for more information. More details and worked examples can be found at https://coventrycc.sharepoint.com/Info/Pages/What-is-an-Equality-Impact-Assessment-(EIA).aspx</p>
Question	Issues to consider
<p>2.3a What HIs exist in relation to your work / plan / strategy</p>	<ul style="list-style-type: none"> • Explore existing data sources on the distribution of health across different population groups (<i>examples of where to find data to be included in support materials</i>) • Consider protected characteristics and different dimensions of HI such as socio-economic status or geographical deprivation
	<p>Response:</p> <p>Service users and residents in care provision who are council funded will have met eligibility criteria under The Care Act 2014, specifically that their needs relate to a physical or mental impairment effecting a number of aspects of their daily life. Services are designed to support individuals in meeting their health and wellbeing outcomes – including health inequalities - and meet individual support needs in a tailored way. Such care is delivered equitably, fairly and in a proportionate way, recognising the individual need of the person. The ethos of the FCOC works to ensure providers are paid in a manner which ensures the longevity and sustainability of the market, ensuring providers can maintain service delivery. In turn, the improvement to market sustainability will assist in ensuring providers can deliver the best care possible and meet health and care outcomes.</p>
<p>2.3b How might your work affect HI (positively or negatively).</p>	<p>Consider and answer below:</p> <ul style="list-style-type: none"> • Think about whether outcomes vary across groups and who benefits the most and least, for example, the outcome for a woman on a low income may be different to the outcome for a woman a high income

<p>How might your work address the needs of different groups that share protected characteristics</p>	<ul style="list-style-type: none"> ● Consider what the unintended consequences of your work might be
	<p>Response:</p> <ol style="list-style-type: none"> a. Potential outcomes including impact based on socio-economic status or geographical deprivation b. Potential outcomes impact on specific socially excluded or vulnerable groups e.g. people experiencing homelessness, prison leavers, young people leaving care, members of the armed forces community. <p>The policy itself specifically focuses on providers of care within 65+ residential settings and home support providers supporting individuals age 18+; provider staff and service users are therefore the parties who will be affected by the implementation and outcome of the FCoC exercise. Coventry will look to influence HIs in a positive manner through the exercise.</p> <p>Service Users: The health of individuals in receipt of the services may benefit in a positive way through improved continuity of care, resulting in better outcomes.</p> <p>Provider staff: There may be positive impact on the health of provider staff. Through the FCoC exercise the Council will work with providers to ensure best use of the funding. Consultation will take place with the provider market on its use however any effect will likely be positive (although probably small) in relation to:</p> <ul style="list-style-type: none"> ➤ Increased job security ➤ Fair recruitment practices (supported by CCC) ➤ Good working conditions <p>We will work with the home support market to facilitate access to green travel / electric vehicles, in turn reducing both fuel costs and the carbon footprint of this method of care delivery.</p> <p>The Council will also be supporting on recruitment events to assist in diversifying the workforce, specifically BAME individuals, refugee and migrant workers and male care workers; Skills for Care data states only 16% of the workforce are male and 33 of the general workforce are male. Such statistics are not reflective of the city's demographics and by assisting in recruitment in this area we hope providers will be in a stronger position to meet the cultural needs of the service users they support.</p>

2.4 Next steps - What specific actions will you take to address the potential equality impacts and health inequalities identified above?

The Council will be producing a Market Sustainability Plan and Market Position Statement which will aim to influence the market in line with the above actions. Funding from the FCoC exercise will be distributed in 2022/23

to contracted home support and care home provision to give resource to providers to enable change. Funding for subsequent years is expected however allocations are not yet known.

2.5 How will you monitor and evaluate the effect of this work?

Intelligence drawn from provider feedback e.g. through provider forums and specific engagement sessions. Market sustainability data through monitoring of Market Sustainability Plan and entrances and exits to/from the market.

2.6 Will there be any potential impacts on Council staff from protected groups?

n/a

You should only include the following data if this area of work will potentially have an impact on Council staff. This can be obtained from: Nicole.Powell@coventry.gov.uk

Headcount:

Sex:

Female	
Male	

Age:

16-24	
25-34	
35-44	
45-54	
55-64	
65+	

Disability:

Disabled	
Not Disabled	
Prefer not to state	
Unknown	

Ethnicity:

White	
Black, Asian, Minority Ethnic	
Prefer not to state	
Unknown	

Religion:

Any other	
Buddhist	
Christian	
Hindu	
Jewish	
Muslim	
No religion	
Sikh	
Prefer not to state	
Unknown	

Sexual Orientation:

Heterosexual	
LGBT+	
Prefer not to state	
Unknown	

3.0 Completion Statement

As the appropriate Head of Service for this area, I confirm that the potential equality impact is as follows:

- No impact has been identified for one or more protected groups
- Positive impact has been identified for one or more protected groups
- Negative impact has been identified for one or more protected groups
- Both positive and negative impact has been identified for one or more protected groups

4.0 Approval

Signed: Head of Service: Jon Reading, Head of Commissioning and Quality	Date: 19/8/22 
Name of Director: Pete Fahy	Date sent to Director: 14/9/22
Name of Lead Elected Member: Cllr Mal Mutton	Date sent to Councillor: 14/9/22

Email completed EIA to equality@coventry.gov.uk



Public report
Cabinet

A separate report is submitted in the private part of the agenda in respect of this item, as it contains details of financial information required to be kept private in accordance with Schedule 12A of the Local Government Act 1972. The grounds for privacy are that it contains information relating to the financial and business affairs of any particular person (including the authority holding that information). The public interest in maintaining the exemption under Schedule 12A outweighs the public interest in disclosing the information.

Cabinet
Council

11th October 2022
18th October 2022

Name of Cabinet Member:

Cabinet Member for Strategic Finance and Resources - Councillor R Brown

Director approving submission of the report:

Joint report:

Managing Director for Coventry Municipal Holdings Limited (A Walster) and
Chief Operating Officer (B Hastie)

Ward(s) affected:

Foleshill

Title: Loan for Material Recycling Facility

Is this a key decision?

Yes - the proposals involve financial implications in excess of £1m per annum.

Executive summary:

The Business Plan for Tom White (TW) for 2022/23 was approved by the Shareholder Committee in March 2022 which supports Tom White business growth and ongoing development.

The business plan set out proposals to redevelop the Tom White recycling infrastructure at Longford Road site. Once completed, this redevelopment will improve the environmental performance of Tom White, dramatically increase the recycling rates for commercial waste and help to increase the financial dividend payable from Tom White back to the Shareholder (the Council).

Tom White growth generally, and the facility redevelopment specifically; focuses on **tackling climate change** and supporting the One Coventry Plan and Climate Change Strategy by

- Enhancing the recycling ability by reducing burden on raw materials and promoting circular economy;

- Achieving greater diversion of commercial waste from landfill; and
- Increasing energy production either directly or through a fuel manufacture.

The recycling facility redevelopment is core to these growth objectives, and the diagram at Appendix C shows how the new MRF sits in the context of overall waste management and recycling in Coventry and the sub-region.

The current recycling plant and equipment used by TW has historically suffered with little planned maintenance under previous ownership and as it reaches the end of its economic life is now experiencing significant breakdowns leading to poor plant availability, with plant availability reducing considerably. During April to December 2021, the facility experienced 72 days of plant downtime. The impact of this was an increased cost of maintenance (plant and vehicle repairs and spares) and increased plant hire in FY2021/22. There was also an increased cost of disposal due to more material going to landfill due to the plant not being available to sort material for an alternative, cheaper and environmentally sustainable disposal route as a fuel source for onward processing.

This existing plant performance is causing significant cost pressures in TW such that month to month the business is currently operating at about 'break even'. accordingly the new plant solution will remove the cost pressures that undermine profitability and allow the business to get back on track for profit and dividend availability.

In the short term the Tom White management team has hired new resilient mobile equipment to compensate for the poor performance of the plant. This means that the old unreliable plant does not need to be run, thereby cutting significantly the maintenance costs and subsequent impacts. However this is not a long term solution for the volume of waste processed through the facility, nor does it provide the opportunity to enhance recycling rates and improve financial returns to the shareholder.

The management team at TW have been working with its preferred supplier to design the new facility to move away from waste disposal but focus on treating commercial waste as commodity from which the maximum environmental and economic benefit should be extracted. Therefore the solution is focussed on creating zero waste to landfill.

The business plan increases economic stability with the business case for the recycling facility increasing financial of Tom White each year.

The approval of the business plan by the Coventry Shareholder Committee was subject to funding; this report puts forward the preferred options to finance the development of the material recycling facility by seeking funding to Tom White via a commercial loan for the sum as detailed in the Private Report to enable delivery of the recycling infrastructure.

Recommendations:

Cabinet is requested to recommend that Council:

- 1) Approve a Loan up to the value detailed in the Private Report on commercial market terms for the purposes of delivering the recycling infrastructure.
- 2) Approve the addition of up to the value detailed in the Private Report to the Councils approved capital programme for the purposes of entering into the Loan
- 3) Approve the increase in the Commercial Investment Strategy limit for 2022/23 for investment in service loans as detailed in the Private Report.

- 4) Delegate authority to the Chief Operating Officer (S151 Officer) and the Chief Legal Officer , following consultation with the Cabinet Member for Strategic Finance and Resources, to finalise and agree the detailed terms of the transaction with Tom White. The authority under this delegation shall also include the power to enter into the necessary legal agreements and subsequently the power to negotiate and agree any such variations as is deemed necessary to the terms of the loan facility and ancillary documents.

Council is recommended to:

- 1) Approve a Loan up to the value detailed in the Private Report on commercial market terms for the purposes of delivering the recycling infrastructure
- 2) Approve the addition of up to the value detailed in the Private Report to the Councils approved capital programme for the purposes of entering into the Loan
- 3) Approve the increase in the Commercial Investment Strategy limit for 2022/23 for investment in service loans as detailed in the Private Report.
- 4) Delegate authority to the Chief Operating Officer (S151 Officer) and the Chief Legal Officer, following consultation with the Cabinet Member for Strategic Finance and Resources, to finalise and agree the detailed terms of the transaction with Tom White. The authority under this delegation shall also include the power to enter into the necessary legal agreements and subsequently the power to negotiate and agree any such variations as is deemed necessary to the terms of the loan facility and ancillary documents.

List of Appendices included:

Appendices are included in the Private Report

Background papers:

None

Other useful documents

None

Has it or will it be considered by scrutiny?

No

Has it or will it be considered by any other council committee, advisory panel or other body?

No

Will this report go to Council?

Yes

18th October 2022

Title of Report: Loan for Material Recycling Facility

1. Context (or background)

- 1.1. The business Plan for Tom White for 2022/23 was agreed by the Coventry Shareholder Committee in March 2022, and supports Tom White business growth and ongoing development. The business plan clearly set out proposals to redevelop the recycling infrastructure (MRF) at Longford Road to improve environmental performance, increase recycling rates for commercial waste and increase the financial dividend payable from Tom White back to the Shareholder (the Council).
- 1.2. The approval of the business plan by the Coventry Shareholder Committee was subject to funding; this report puts forward the preferred option available for funding the proposed infrastructure.
- 1.3. The approved Tom White business plan together with the approved business case for the MRF redevelopment are included in the Private report for information. It should be noted that the costs have increased since the business plan was approved to take into account global movements in construction costs and changes in the recycling market. The main points are summarised below:
 - **An improvement in the environmental performance** of Tom White taking the recovery of recyclable materials from c.7% of the waste delivered to Tom White, to over 70% meaning a significant enhancement of recycling performance and reduction in the cost of waste disposal. This contributes to the circular economy, with more material being recycled into new products with less reliance on the raw material in manufacture – a key aspect of tackling Climate Change.
 - Delivers **greater business resilience** for Tom White with far less reliance on third party providers to take the non-recyclable material received by Tom White from its customers. This provides greater market surety and more cost effective disposal routes that should completely avoid the use of Landfill or the export of material from the UK. This is also a key aspect of contributing to tackling Climate Change.
 - Delivers a **positive financial return** to Tom White that allows for greater dividend to be payable to the Shareholder in future years – this supports the ongoing financial sustainability of the Council and with 'profit for purpose' supports the funding of front line services in Coventry.
 - Provides an **enhanced recycling service** to businesses in communities across the city that previously may have been unaffordable – having the facility located in Coventry and achieving value from the materials recycled means a comprehensive recycling service will be affordable to all business communities in Coventry. We will **contribute to improving outcomes** for our communities in Coventry.
- 1.4. The proposed automated solution with mechanical sorting and recovery through utilising optical sorters and other equipment to sort material into individual product streams, improving the accuracy, pick rate and material quality. The proposed solution provides contingency as the equipment can be configured to adapt to changes in the commodity market and waste stream. It is assumed the new facility will be operational from Autumn 2023.

- 1.5. It is on the basis as described above that the approval to redevelop the Material Recycling Facility (MRF) at Tom White was approved by the Coventry Shareholder Committee, subject to securing funding. The costs for the recycling facility are detailed in the Private report.

2. Options considered and recommended proposal

- 2.1. Three options have been considered for delivering funding for the redevelopment of the MRF at Tom White which are set out as follows:

Option 1 - Do Nothing

- 2.2. Doing nothing would result in the MRF not being redeveloped. The existing MRF is now beyond its useful life, with the costs of ongoing maintenance being prohibitive to Tom White's financial performance, impacting on dividend potential to the Shareholder. Furthermore the MRF is no longer able to keep up with current best environmental practices, with only 7% of input materials being recovered for recycling. The remainder being either sent to landfill or incinerated to extract energy which is contrary to the recognised waste hierarchy, whilst also presenting more costly routes for the disposal of waste.
- 2.3. This option would result in the environmental benefits of the MRF not being realised, and the company would not be in a position to declare any further dividend based on the expected higher costs of operation.
- 2.4. The mobile equipment that has been acquired could continue to be utilised, but this is not a long term solution as the equipment is not designed for the volumes of waste that we would expect the flow through the facility.
- 2.5. This is not the recommended option.

Option 2 - Third Party Asset Backed Debt Funding

- 2.6. The Tom White team has explored third party funding through a number of routes. Heads of terms have been presented by a third party funder for the MRF project. They have undertaken commercial and technical due diligence on the redevelopment proposals and are keen to fund the development.
- 2.7. The third party has provided Tom White with a commercial term sheet, with details of the terms of the loan with a payment company guarantee from the Council. This was based on the expected costs of the facility, which have now increased due to agreement of final design and movements in the price of materials within the market.
- 2.8. If the Council was to offer a Parent company guarantee it would mean that if Tom White was not in a position to meet the debt servicing costs, the Council would have to step in and meet the liabilities of repaying back the Loan. If the Council provided the parent company guarantee the value would be required to be noted on in the Council's accounts as a contingent liability without receipt of any of the interest benefits.
- 2.9. Whilst this option avoids the need for the Council to provide a Loan on market terms into Tom White for the MRF redevelopment, the Shareholder (Council) would retain the payment risk associated with the funding without the benefit of the interest payment.
- 2.10. This is not the recommended option.

Option 3 - Shareholder Loan

- 2.11. Coventry Shareholder Committee approved the investment in principle for TWW as part of the business plan approvals in March 2022. This was subject to securing suitable finance to take the project forward.
- 2.12. The Council could provide a shareholder loan for the value detailed in the Private report to Tom White using the offer from the third party funder as a market comparator and the specific commercial market terms. The Council have used the EU Reference Rates to help determine the interest rate which is to be charged under a Loan on market terms. In line with the CIPFA Prudential Borrowing Code the Council can justify financing the project on the basis of the primary environmental and social benefits achieved as a direct result of the investment. The development of the MRF supports the Council's Climate Change Strategy, in particular the aspirations in relation to the Circular Economy as detailed within the plan and depicted in the Appendices, rather than the primary driver being to generate income.
- 2.13. The Council's cost of borrowing is lower than the rate of interest that the Council will charge to TWW. This means that the Council will generate a financial benefit from a loan arrangement. The risk of providing a loan is no greater in effect than the financial guarantee considered in option 2.
- 2.14. The project supports the Council in meeting its Climate Change Strategy and enables the Council to provide finance for the project without any greater perceived risk than under option 2, but with the ability to receive a revenue stream as loan interest, which is a by-product of the financing agreements. This is the recommended option.

3. Results of consultation undertaken

- 3.1. No formal consultation has been or is planned to be undertaken in respect of this paper. However the business plan for Tom White for 2022/23 and the business case for the MRF redevelopment has been shared and approved previously by the Shareholder Committee.

4. Timetable for implementing this decision

- 4.1. It is intended that the construction contract for the MRF development will be entered into within 4 weeks of this decision, with the MRF fully operational within 12 months. The Business Plan contemplated that Tom White's would start operating the new facility from February 2023. This date has now slipped to further design development, engagement with funders, and concluding the contracts for the construction. Global supply chain pressures have also extended lead times, resulting in a c.12 month lead time for completion of the facility. It is anticipated that the plant will be operational by Autumn 2023 assuming all contracts concluded, and prices fixed in October 2022.

5. Comments from Chief Operating Officer (Section 151 Officer) and Director of Law and Governance

5.1. Financial Implications

The investment in the Material Recycling Facility (MRF) was approved in principle, subject to funding by Shareholder Committee in March 2022. TW management team have secured an offer for finance from a third party which provides a market comparator to the Shareholder loan terms. The proposal from the third party funder required a payment guarantee from the Council to move ahead with the loan. This would in effect mean that the Council would have

to account for the perceived risk of the payment guarantee being called on. The payment guarantee would be appraised annually for the risk of the guarantee being called in with the resulting sum being referenced within the Council's accounts as an impairment provision.

The Shareholder loan has been set to a longer term based on the life of the asset. The Council will finance the loan using prudential borrowing, which will be repaid from the loan repayments for capital and interest from Tom White's, over the life of the loan.

The investment by the Council is in line with the CIPFA Prudential Borrowing regulations due to the project supporting the Councils Climate Change Strategy and the strong strategic climate change aspirations in the One Coventry Council Plan. Investing in this facility will improve the recycling ability of the plant from 7% to 70%. The facility will ensure that there is zero or very little waste sent to landfill and increase business resilience through having access to more markets for the offtake material and recyclates extracted from the waste stream.

As part of the Commercial Investment Strategy the Council set limits for investing in shares and service loans, with a total limit of £123m for 2022/23. These were reported on the Q1 Monitoring Report in August 2022. The proposed loan would increase the total level of investments through service loans, including planned and committed, to take account of the additional loan finance. Whilst this is a significant further investment within the waste sector, it provides a significant opportunity to develop facilities in line with the Council's Climate Change Strategy and One Coventry principles, with the risks associated with the development being managed as described in this report. It is proposed that the limit for loans provided to external organisations be increased to include the value of the loan as detailed in the Private report to facilitate the development, whilst maintaining a small element of headroom within the limit.

The payment terms for the Shareholder loan would be on market terms and conditions, with the capital repayment spread evenly over the term of the loan, and interest calculated on a reducing balance basis (equal instalment payment basis). The investment in the new equipment should derive a return greater than the cost of capital financing each year leaving resource within the company to declare a dividend back to the Council.

The forecast position indicates that Tom White's underlying business and the MRF investment will generate sufficient cash to enable the business to declare a dividend once the facility is operational.

The proposal in this report represents a major investment, the risk for which rests with the Council ultimately, given its role as 100% shareholder. Repayment of the loan and delivery of financial returns in the form of additional dividends will rely upon the trading performance of Tom White over the lifetime of the MRF infrastructure. The proposals have been subject to significant due diligence and external advice which provide a high degree of confidence that these proposals are financially sound. Like all such proposals however, it is important to recognise the commercial risk involved. The Council has taken care to extend its overall commercial investments over a broad range of activities to provide protection against financial shocks that might affect specific sectors. Given the financial backdrop to local government funding and the approaching financial headwinds of inflation and financial recession, the greatest risk to the Council is to do nothing. The proposal contained here demonstrates a continued commitment by the Council to protect its financial position through well researched investments supported by robust business cases.

5.2. Legal Implications

- 5.2.1. Under Section 12 of the Local Government Act 2003, the Council has a specific power to invest (or provide a loan). The power states "a local authority may invest for any purpose relevant to its functions under any enactment or for the purposes of the prudent management of its financial affairs". This provides the Council with a power to invest in Tom White, for any purpose relevant to its functions (this function would have to be identified) or if the Council can show it is for the prudent management of its financial affairs.
- 5.2.2. Furthermore, under section 1 of the Localism Act 2011, the Council also has a power "to do anything that individuals generally may do" (the "General Power of Competence"). "Individual" means an individual with full capacity. The General Power of Competence gives the Council:
- Power to do a thing anywhere in the United Kingdom or elsewhere;
 - Power to do it for a commercial purpose or otherwise for a charge, or without charge, and
 - Power to do it for, or otherwise than for, the benefit of the authority, its area or persons resident or present in its area.
- 5.2.3. The Council will be compliant with the requirements of both the General Power of Competence and the Power to Invest. This report serves as the case for the proposal and the basis on which the investment powers can be utilised.

Subsidy Control

- 5.2.4. Following the withdrawal of the United Kingdom from the European Union which came to an end at 11pm on 31 December 2020. EU State aid law no longer applies to financial assistance provided by UK public authorities.
- 5.2.5. However, under Chapter 3 of Title XI of Part 2 (the "Subsidy Control Chapter") of the Trade and Co-operation Agreement between the European Union and the United Kingdom (the "TCA"), both the EU and the UK have undertaken to implement an effective subsidy control regime in their respective territories.
- 5.2.6. It should be noted that the Subsidy Control Chapter is only relevant where a particular public intervention meets the definition of a "subsidy" in the TCA. The Subsidy Control Act 2022 gained royal assent in April 2022 and comes into force in the autumn.
- 5.2.7. Market Economy Investor Principle ("MEIP") is a well established exemption to the previous EU State Aid legislation. Such as exemption is still applicable to the Subsidy Control Regime (which replaces the previous EU State Aid Legislation). A Loan does not automatically constitute a subsidy if the Council carries out prior due diligence that demonstrates that investments are likely to generate sufficient returns that a private prudent investor would have made the same investment. i.e. the Council can invest in the proposal in return for an appropriate commercial return which would satisfy the expectations of a private prudent investor.
- 5.2.8. The risk of Subsidy is not dependent upon whether the financial return is actually ever achieved by the Council, as whether the Subsidy exists or not is assessed at the time of the funding advanced, but there must be a realistic prospect of the financial return being achieved by the Council.
- 5.2.9. We have undertaken analysis of interest rate based on the EU Reference Rates which show that the rate of interest charged is an appropriate rate of interest to charge on market terms

based on the rates issued by the EU. Therefore the investment by the Council would not be conveying an economic advantage and also demonstrates the MEIP test.

5.2.10. In practice the Council would need to rely on the MEIP analysis as a justification for any subsidy in the event of a complaint, challenge or investigation. The risk of Subsidy Control is not dependent upon whether the financial return is actually ever achieved by the Council, as whether subsidy exists or not is assessed at the time of the funding advanced, but there must be a realistic prospect of the financial return being achieved by the Council.

5.2.11. The Council is complying with Subsidy Control Regime as the transaction is being undertaken upon arms' length terms and will comply with the MEIP principle, meaning that no benefit is conferred on the recipient and therefore there is no distortion to competition.

6. Other implications

6.1. How will this contribute to the Council Plan (www.coventry.gov.uk/councilplan/)?

The proposal complements the One Coventry Plan as below:

Improves the environmental performance of Tom White taking the recovery of recyclable materials from c.7% of the waste delivered to Tom White, to over 70% meaning a significant enhancement of recycling performance. This contributes to the circular economy, with more material being recycled into new products with less reliance on the raw material in manufacture – a key aspect of **tackling Climate Change**.

Delivers greater business resilience for Tom White with far less reliance on third party providers to take the non-recyclable material received by Tom White from its customers. This provides greater market surety and more cost effective disposal routes that avoids completely the use of Landfill or the export of material from the UK. This is also a key aspect of contributing to **tackling Climate Change**.

Delivers a positive financial return to Tom White that allows for greater dividend to be payable to the Shareholder in future years – this supports the **ongoing financial sustainability** of the Council and with 'profit for purpose' supports the funding of front line services in Coventry. This is discussed further in the financial section of this report.

Provides an enhanced recycling service to businesses in communities across the city that previously may have been unaffordable – having the facility located in Coventry and achieving value from the materials recycled means a comprehensive recycling service will be affordable to all business communities in Coventry. We will contribute to **improving outcomes for our communities** in Coventry.

6.2. How is risk being managed?

A project risk assessment and mitigation plan is being developed and incorporated within the construction planning process. A professional Owners Engineer / Project Manager is being employed to oversee the detailed design and construction process post contract award to ensure construction and interface risks are suitably managed and mitigated.

This business case for the investment was approved by Shareholder Committee in March 2022 and will be incorporated into the budget for Tom White for FY24 onwards which will be subject to approval by Shareholder Committee. Regular updates will be provided by the management team to the Board of Directors to ensure the investment is progressing as expected. The Loan Facility agreement will also contain market terms and clauses such a

requirement for regular financial updates from TW to the Council to ensure they are able to meet the terms of the loan agreement

A number of sensitivity scenarios have been considered to test and support the financial case for the investment.

6.3. What is the impact on the organisation?

The proposal in this report represents a major investment, the risk for which rests with the Council ultimately, given its role as 100% shareholder. The repayment of the loan and delivery of any dividends will rely upon the trading performance of Tom White over the lifetime of the MRF infrastructure. The proposals have been subject to significant due diligence and external advice which provide a high degree of confidence that these proposals are financially sound. Like all such proposals however, it is important to recognise the commercial risk involved.

The Council's Commercial Investment Strategy is designed to ensure that the Council's management arrangements and level of commercial investments in the form of shares, commercial property and loans to external organisations is proportionate to the size of the Council. The proposed Shareholder loan requires the existing limits for loans to be increased as recommended in this report. The Council has taken care to extend its overall commercial investments over a broad range of activities to provide protection against financial shocks that might affect specific sectors.

Given the financial backdrop to local government funding and the approaching financial headwinds of inflation and financial recession, the greatest risk to the Council is to do nothing. The proposal contained here demonstrates a continued commitment by the Council to protect its financial position through well researched investments supported by robust business cases. The risks and mitigating actions are covered in the section above to reduce the impact on the Council and ensure oversight of the loan investment.

6.4. Equalities / EIA?

No equality impact assessment has been carried out as the recommendations do not constitute a change in service or policy.

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

This proposal has a material positive impact on climate change and the environment. The MRF redevelopment will significantly increase the recycling of commercial waste in Coventry that is received by Tom White from 7% to over 70%, contributing to the circular economy, reducing the burden on raw materials. Currently 46% of material is sent to landfill at a cost of £1.8m pa which should be reduced to close to zero.

The quality of the outputs will ensure that UK based processors will be sourced for the separated materials, and there will be increased opportunities to access emerging UK markets materials such as plastic film.

Having the development situated in Coventry will result in less transport miles for recyclable material to be processed by a state-of-the-art facility.

6.6. Implications for partner organisations?

The report has implications for TW in which the Council has a shareholder interest through Coventry Municipal Holdings Limited, who have 100% of shares in TW. The investment will

have a significant environmental impact on the operation of Tom White with a dramatic improvement to the material recovery rates and a reduction in the cost of waste disposal, including a reduction in the headcount currently used to pick the waste for separation. The 4 affected posts will be re-trained and redeployed within the organisation.

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Director: Andrew Walster	Managing Director	Coventry Municipal Holdings	6 th August 22	6 th August 22
Members: Councillor Richard Brown	Cabinet Member for Strategic Finance and Resources	-	8 th August 22	26 th Sept 22

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