



Community & Children's Services Committee

Date: WEDNESDAY, 13 DECEMBER 2023
Time: 2.00 pm
Venue: COMMITTEE ROOMS, WEST WING, GUILDHALL

Members:

Ruby Sayed (Chair)	Caroline Haines
Helen Fentimen (Deputy Chair)	Laura Jørgensen
Joanna Tufuo Abeyie	Florence Keelson-Anfu
Deputy John Absalom	Alderman Alastair King DL
Munsur Ali	Alderman Christopher Makin
Shahnan Bakth	Benjamin Murphy
Jamel Banda	Matt Piper
Matthew Bell	Henrika Priest
Ian Bishop-Laggett	Deputy Nighat Qureishi
Deputy Anne Corbett	Naresh Hari Sonpar
Aaron D'Souza	James St John Davis
Mary Durcan	Ceri Wilkins
Deputy John Fletcher	Deputy Philip Woodhouse
Deputy Marianne Fredericks	
Steve Goodman OBE	
John Griffiths	

Enquiries: julie.mayer@cityoflondon.gov.uk

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<https://www.youtube.com/@CityofLondonCorporation/streams>

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Ian Thomas CBE
Town Clerk and Chief Executive

AGENDA
Part 1 - Public Reports

1. **APOLOGIES**

2. **MEMBERS' DECLARATIONS UNDER THE CODE OF CONDUCT IN RESPECT OF ITEMS ON THE AGENDA**

3. **MINUTES**

To approve the public minutes and non-public summary of the meeting held on 1st November 2023.

For Decision
(Pages 9 - 18)

4. **OUTSTANDING ACTIONS**

To note the outstanding actions list.

For Information
(Pages 19 - 20)

5. **ANNUAL REVIEW OF THE COMMITTEE'S TERMS OF REFERENCE**

Report of the Town Clerk.

For Decision
(Pages 21 - 24)

6. **APPOINTMENT TO THE HOUSING MANAGEMENT AND ALMSHOUSES SUB COMMITTEE**

To appoint a Member to the Housing Management and Almshouses Sub Committee.

For Decision

7. **CARERS STRATEGY 2023-27**

Report of the Executive Director, Community and Children's Services.

For Decision
(Pages 25 - 100)

8. **CARE LEAVER COMPACT**

Report of the Executive Director, Community and Children's Services.

For Decision

(Pages 101 - 132)

9. **SAFE HAVENS IN THE CITY OF LONDON**

Report of the Executive Director, Community and Children's Services.

For Decision
(Pages 133 - 138)

10. **CITY OF LONDON ANTI-SOCIAL BEHAVIOUR POLICY**

Report of the Executive Director, Community and Children's Services.

For Decision
(Pages 139 - 160)

11. **CARE EXPERIENCE AS A PROTECTED CHARACTERISTIC - POLICY APPROVAL**

Report of the Executive Director, Community and Children's Services.

For Decision
(Pages 161 - 170)

12. **COMMUNITY CENTRE FINANCE (PORTSOKEN AND GOLDEN LANE COMMUNITY CENTRES)**

Report of the Executive Director, Community and Children's Services.

For Decision
(Pages 171 - 180)

13. **COMMUNITY PATROLLING SERVICE - VARIATION OF CONTRACT**

Report of the Executive Director, Community and Children's Services.

For Discussion
(Pages 181 - 184)

14. **ROLES AND POWERS OF COMMUNITY SAFETY AND CONSTABULARY POWERS IN THE CITY**

Report of the Town Clerk.

For Information
(Pages 185 - 198)

15. **CHILDREN'S SOCIAL CARE SELF EVALUATION FRAMEWORK (SEF)**

Report of the Executive Director, Community and Children's Services.

For Information

16. **COMMUNITY & CHILDREN'S SERVICES (NON-HOUSING) REVENUE OUTTURN FORECAST AS AT QUARTER 2 - 2023/24**

Report of the The Chamberlain and the Executive Director, Community and Children's Services.

For Information
(Pages 203 - 206)

17. **UPDATES FROM SUB COMMITTEES, ALLOCATED MEMBERS AND PORTFOLIO HOLDERS**

For Information

18. **QUESTIONS ON MATTERS RELATING TO THE WORK OF THE COMMITTEE**

19. **ANY OTHER BUSINESS THAT THE CHAIRMAN CONSIDERS URGENT**

20. **EXCLUSION OF THE PUBLIC**

MOTION - That under Section 100A(4) of the Local Government Act 1972, the public be excluded from the meeting for the following items of business on the grounds that they involve the likely disclosure of exempt information as defined in Paragraph 3 of Part I of Schedule 12A of the Local Government Act.

For Decision

Part 2 - Non-Public Reports

21. **NON-PUBLIC MINUTES**

To agree the non-public minutes of the meeting held on 1st November 2023.

For Decision
(Pages 207 - 212)

22. **NON-PUBLIC OUTSTANDING ACTIONS**

To note the non-public outstanding actions list.

For Information
(Pages 213 - 214)

23. **CHILDREN'S SOCIAL CARE SEF - NON-PUBLIC APPENDIX**

To note a non-public appendix in respect of agenda item 15.

For Information
(Pages 215 - 264)

24. **NON COMPLIANT WAIVER: EMERGENCY AND TEMPORARY ACCOMMODATION**

Report of the Executive Director, Community and Children's Services.

For Decision
(Pages 265 - 286)

25. **GATEWAY 3/4 OPTIONS APPRAISAL: WILLIAM BLAKE ESTATE WINDOW REPLACEMENT AND COMMON PARTS REDECORATIONS**

Report of the Executive Director, Community and Children's Services.

For Decision
(Pages 287 - 316)

26. **GATEWAY 5 ISSUES REPORT: CITY OF LONDON PRIMARY ACADEMY ISLINGTON (COLPAI)**

Report of the Executive Director, Community and Children's Services.

For Decision
(Pages 317 - 320)

27. **CITY OF LONDON CHILDREN'S CENTRE SERVICES AND FAMILY HUB DEVELOPMENT**

Report of the Executive Director, Community and Children's Services.

For Decision
(Pages 321 - 418)

28. **HOUSING REVENUE ACCOUNT (HRA) - COMMERCIAL PROPERTY DEBT POSITION AND ARREARS RECOVERY**

Report of the Executive Director, Community and Children's Services.

For Decision
(Pages 419 - 442)

29. **EXTENSION TO REPAIRS AND MAINTENANCE CONTRACTS**

Report of the Executive Director, Community and Children's Services.

For Information

30. **QUESTIONS ON MATTERS RELATING TO THE WORK OF THE COMMITTEE**

31. **ANY OTHER BUSINESS THAT THE CHAIRMAN CONSIDERS URGENT AND WHICH THE COMMITTEE AGREE SHOULD BE CONSIDERED WHILST THE PUBLIC ARE EXCLUDED**

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COMMUNITY & CHILDREN'S SERVICES COMMITTEE

Wednesday, 1 November 2023

Minutes of the meeting held at Guildhall at 2.00 pm

Present

Members:

Ruby Sayed (Chair)

Helen Fentimen (Deputy Chair)

Munsur Ali

Matthew Bell

Ian Bishop-Laggett

Anne Corbett

Mary Durcan

Deputy John Fletcher

Deputy Marianne Fredericks

Steve Goodman OBE

John Griffiths

Alderman Christopher Makin

Henrika Priest

Naresh Hari Sonpar

Ceri Wilkins

Deputy Philip Woodhouse

Officers:

Judith Finlay

- Executive Director, Community and Children's Services

Andrew Fothergill

- Comptroller and City Solicitors

Mark Jarvis

- Chamberlains

Polly Dunn

- Assistant Town Clerk

Raquel Pinto

- Town Clerks

Jason Hayes

- Community and Children's Services

Chris Pelham

- Community and Children's Services

Simon Cribbens

- Community and Children's Services

Pam Wharf

- Community and Children's Services

Deborah Bell

- Community and Children's Services

Dean Elsworth

- Community and Children's Services

Mark Lowman

- Community and Children's Services

1. APOLOGIES

Apologies were received from Caroline Haines, Florence Keelson-Anfu, Alderman Alastair King and Benjamin Murphy.

The following Members joined the meeting remotely Joanna Tufuo Abeyle and James St John Davis.

2. MEMBERS' DECLARATIONS UNDER THE CODE OF CONDUCT IN RESPECT OF ITEMS ON THE AGENDA

Deputy Marianne Fredericks declared a standing non-pecuniary interest by virtue of her position as a Governor of the Aldgate School.

In respect of the urgent item of business on the Middlesex Street Estate (Opt-out of Communal heating system), whilst there were no declarations on this matter, the Town Clerk advised that any similar, future projects would need to be considered on merit, noting that Members are responsible for managing

their own pecuniary interests. *NB. Members were asked to be mindful that, as soon as they become aware of a potential conflict of interest, they should raise this with the Town Clerk/Monitoring Officer, in order to receive timely advice ahead of the relevant Committee meeting.*

3. **MINUTES**

RESOLVED, that – the public minutes and non-public summary of the meeting held on 14th September 2023 be approved.

Matters arising

Members noted that there had been a brief delay to the damp works at the Almshouses, due to lack of access in respect of ill-health, but works were now underway. In respect of other snagging issues, an environmental sensor was being trialled in respect of windows and ventilation. The installation of CCTV would require Listed Building Consent.

4. **OUTSTANDING ACTIONS**

Members received the actions list and noted the following updates:

1. Charges to leaseholders would be covered in a report to a future meeting.
2. The Deed of Variation in respect of the Repairs and Maintenance Contract, would be presented to the Finance and Project and Procurement Committees at the end of this year/early next year, with tracking of the tendering process and resident consultation being monitored by this Committee.
3. Members noted the previous suggestion for an arbitration/compensation system in respect of missed appointments and poor service. The Chair advised that this would be considered by the Housing Management and Almshouses Sub Committee in the first instance.

5. **TERMS OF REFERENCE FOR THE HOMELESSNESS AND ROUGH SLEEPING (HRS) SUB COMMITTEE**

The Committee considered a report of the Town Clerk in respect of proposed changes to the Terms of Reference of the HRS Sub Committee, recommended by the Sub Committee, in respect of external membership and frequency of meetings.

Chair asked if this could be deferred in order to consider appointing external Members with sector experience.

DEFERRED

6. **HOMELESSNESS & ROUGH SLEEPING STRATEGY 2023-2027**

The Committee considered a report of the Executive Director, Community and Children's Services, which presented the City of London Corporation's draft Homelessness & Rough Sleeping Strategy (2023-27) for approval. Members noted that the draft Strategy had been scrutinised and endorsed by the Homelessness & Rough Sleeping Sub Committee.

The Chair thanked the Sub Committee and officers for their work on this comprehensive Strategy. The Chair of the Homelessness and Rough Sleeping Sub Committee was in attendance; keen to hear the views of CCS Members, noting that it would be a very dynamic and flexible strategy. There was a suggestion that the Strategy should make reference to the 5 Business Improvement Districts, to ensure a shared agenda and outcomes.

Members noted that the City Corporation is part of a GLA led partnership, represented by key partners, which reports to the Department of Levelling up. The City Corporation enjoys a good working relationship with the London Borough of Hackney and challenges over individual cases are rare. The Assistant Director assured the Committee that objectives are well aligned across housing, health and commissioning and the Strategy's initiatives are evident across the Partnership.

The Director agreed to respond outside of the meeting in respect of the total cost of the service, which was not covered in the Strategy.

RESOLVED, that – the draft Homelessness & Rough Sleeping Strategy for 2023-27, as set out in in Appendix 1 to the report, be approved, subject to the inclusion of the 5 Business Improvement Districts.

7. CITY OF LONDON PRIMARY ACADEMY ISLINGTON (COLPAI) - RESIDENTIAL BUILDING NAME

The Committee considered a report of the Director of Community and Children's Services in respect of the naming of the City of London Primary Academy Islington (COLPAI) residential development, which will deliver 66 much-needed homes for social rent, and three commercial units. Following several submissions and ballots, the most successful eligible name was "Black Raven Court, derived from the historical Black Raven Court Street name which existed in the area during the 1700s.

RESOLVED, that - the building be named "Black Raven Court" to enable the project team to register it with London Borough of Islington and procure the signage.

8. EDUCATIONAL CAMPAIGN: TACKLING VIOLENCE AGAINST WOMEN AND GIRLS

The Committee considered a report of the Executive Director, Community and Children's Services, seeking Member support to launch a Violence Against Women and Girls Educational campaign, developed by the City of London Corporation Community Safety Team, alongside the London Boroughs of Hackney and Tower Hamlets.

Members commended an excellent report, noting particularly the step change being sought in behaviours. The Chair further advised of the work in schools targeting teenage boys; the curriculum is frequently reviewed by the DfE and gives Schools autonomy to meet the needs of their communities. The Director of Education agreed to circulate details of this initiative to the City's schools via

weekly communications. The Virtual Head Teacher was also following up this work in respect of looked after children.

The Deputy Chair, who represents the Committee on the Police Authority Board, advised that the Board had approved this report at their last meeting and received a briefing from Baroness Casey on significant learnings from her review of the Metropolitan Police. The Board and various community Groups had asked for use of the acronym 'VAWG' to cease.

A Member advised of a similar campaign in a Canadian Town in respect of drinking and consent and their material is available for free if the town is accredited. The Member agreed to forward the link to the relevant officers. The Officer advised that both Licensing and the Police are enhancing their Christmas campaigns.

Members asked to see outcomes in terms of changing behaviours in due course.

RESOLVED, that – the commissioning of the campaign be approved.

9. **UPDATES FROM SUB COMMITTEES, ALLOCATED MEMBERS TO THE VARIOUS HOUSING ESTATES AND PORTFOLIO HOLDERS**

Vacancy on the Safeguarding Sub Committee

RESOLVED, That – being the only Member expressing a willingness to serve, Eamonn Mullalley be appointed to the Safeguarding Sub Committee for the year ensuing.

Vacancies on the Housing Management and Almshouses Sub Committee

Members noted that there was one long-standing vacancy for this Sub Committee, which had been advertised to the wider court and received three expressions of interest. However, another Member of the Sub Committee had resigned earlier this week.

It was suggested that the three members expressing an interest be allowed to join today. However, Members noted recent amendments to Standing Orders, whereby the memberships of Sub Committees should only be extended in exceptional circumstances. Therefore, the Chair suggested, and Members agreed, that the later vacancy should be filled once all Members of CCS had been given a chance to apply, given that some Members had submitted apologies today and might not be aware of the latest resignation. Furthermore, all three candidates were Members of the wider Court and not CCS Members. The Town Clerk agreed to write to all Members of CCS after the meeting, calling for nominations within the next 14 days. In the absence of any expressions of interest, the vacancy would, once again, be opened up to the whole Court.

Following a ballot whereby Eamonn Mullalley received 5 votes, Mark Wheatley received 2 votes and Alderwoman Susan Pearson received 8 votes, it was

RESOLVED, that – Alderwoman Susan Pearson be appointed to the Housing Management and Almshouses Sub Committee for the year ensuing.

Updates from the Allocated Members

Deputy John Fletcher had provided a written update for Members in respect of outstanding items on Middlesex Street and asked officers to keep him apprised of progress. Members noted that, at a recent resident association meeting, there was strong resistance to the installation of sprinklers in the tower blocks, due to residents' concerns about legacy issues with the City Corporation's various major projects.

Ceri Wilkins reported on various issues on the Golden Lane Estate in respect of repairs and maintenance, and the lack of CCTV, porters, cleaners and gardeners. However, a Ward Meeting had been scheduled for the following day when, these matters could be considered further. The Allocated Member thanked officers for responding to a query about the Pets Policy, outside of this meeting. Members also noted the appointment of a new Estate Officer at the Windsor Estate, as the Golden Lane Estate Officer had been covering both positions.

The Head of Major Projects advised that there would be a number of stakeholder events over the next few weeks to visit the newly refurbished flat on the Golden Lane Estate. Members noted that the work was of a very high standard.

Young People

Florence Keelson-Anfu had recently attended the Trustee Board and AGM for 'Partnership for Young London' where the annual budget and strategy had been agreed. Florence had agreed to support them with an apprenticeship and approach the City of London Corporation's HR Department, noting that the City Corporation are looking to ringfence apprenticeships to care leavers. The Chair, Deputy Chair and Florence would be attending the Children in Care Council (CICC) Awards Ceremony for Care Leavers at the Guildhall.

Sydenham Hill

The Chair advised that the asbestos issues were being resolved and was pleased to report on improved relationships with residents. There were some issues with vibrations and surveys were underway to seek a resolution.

Integrated Commissioning Board (ICB)

The Deputy Chair advised that the last meeting had considered winter planning, in light of the recent increase in Covid and respiratory infections. Members noted the importance of the work of the voluntary sector, pre and post hospital admissions, and detailed plans had been submitted to the Better Care Fund to ensure sustainable investments. The ICB also alternates business meetings with development sessions, with a development session scheduled for the following week.

Homelessness and Rough Sleeping

The last meeting had received a presentation from Home Connections, who had taken over Streetlink, and received valuable feedback from Members. The Sub Committee's Terms of Reference and the new Homelessness and Rough Sleeping Strategy also appeared on this agenda. Members noted that the Assessment Centre is expected to complete at the end of December 2023, a number of businesses across the square mile had pledged support and meetings were being arranged with officers.

Safeguarding

The Chair provided an update on care leavers receiving a TfL subsidy and support with Council Tax payments, which would be the subject of a report to the next Safeguarding Sub Committee and the next meeting of this Committee, for approval. Work was underway in respect of the new CQC Framework to ensure that the City Corporation is in a good place for the forthcoming inspection. The Deputy Chair had also attended a National Webinar on this matter. Members were reminded of the Corporate Parenting Hybrid session scheduled for 14th November and encouraged to attend or dial in.

Housing Sub

The Chair welcomed Pam Wharf, the new Interim Director of Housing, noting also the high number of housing reports on this agenda, which evidenced the intensive work underway to resolve legacy issues on both the City and out-of-City Estates. Work was also underway in respect of enhancing governance across the Housing Revenue Account and the implementation of a separate Housing Committee. Members noted that, whilst the recent tenants satisfaction survey had been poor in respect of repairs and maintenance, there had been some improvements in respect of major works.

10. QUESTIONS ON MATTERS RELATING TO THE WORK OF THE COMMITTEE

A member asked about the lack of consultation over the use and recharging in respect of agency cleaning staff. The Executive Director, who took up her position in June 2023, advised that, since 2017, the cost for temporary staff had been apportioned to leaseholders. The Director also accepted that there had been no consultation in 2017 but the City Corporation had sought Counsel's opinion and communications with residents would follow.

The City of London Women's Project (information only) report would be presented to a future meeting of the Committee for discussion. The Director agreed to speak to the Town Clerk in respect of future management of information and decision reports on Committee agendas. With effect from December the budget reports, which are also for information, would also appear on the main agendas.

11. ANY OTHER BUSINESS THAT THE CHAIRMAN CONSIDERS URGENT

Middlesex Street Heating System - Opt-out.

The Chair has agreed to receive this report as urgent business and apologised for the late despatch, which had been necessary to ensure that the information is as comprehensive as possible. Members noted that this iteration of the report responded to the outstanding queries from the last meeting and the City Solicitor was in attendance for any further questions.

During the discussion and questions on this item, the following points were noted:

1. The City Corporation can compel leaseholders to provide access to flats for inspections/surveys in respect of the replacement heating system. If there are a large number of access refusals then the project could still progress in terms of the pipework and the heating system would still operate. As a last resort, an injunction could be sought to gain access.
2. In theory, a challenge to the reasonableness of costs, on the basis that they have been incurred contrary to the Corporation's Climate Action Strategy, could be brought before the First-tier Tribunal but would be unlikely to succeed.
3. Removal of residents from the communal system increases the apportionment, making contributions from the remaining leaseholders higher. This would also apply to future servicing and repairs costs and component replacement and add further financial burden to HRA budgets.
4. No other City or out of City Estates would be able to opt out as they do not have communal systems.
5. Middlesex Street Petticoat Tower was offered the Cadent Scheme but the take-up was low and the Square will not be eligible.
6. Members expressed some concern as to the highly technical nature of this matter, although they accepted that the current system is at end of lifespan. There was some surprise at this being a gas installation, as it is far less popular, but a full comparison across various alternative systems had been provided.
7. A couple of Members were very concerned at having to take this decision, as it would be imposing a system on a small number of residents, noting that the cost and inconvenience of allowing them to opt-out would be negligible. A conflicting view was expressed in that a large majority are satisfied with the proposal.

At 3.35 the Committee agreed to extend the meeting beyond 2 hours to conclude the business on the agenda.

On being put to the vote, 9 Members voted for and 2 voted against the proposal and it was RESOLVED, that - the Communal heating and hot water system will be installed to all properties on the Middlesex Street Estate, that are currently served by the existing communal heating system, as per leases under repair, with service charges for the communal heating and hot water system installation and future servicing costs recoverable from leaseholders.

12. **EXCLUSION OF THE PUBLIC**

RESOLVED – That, under Section 100A(4) of the Local Government Act 1972, the public be excluded from the meeting for the following items of business on the grounds that they involve the likely disclosure of exempt information as defined in Paragraph 3 of Part I of Schedule 12A of the Local Government Act.

Item no(s) Para no(s)

13. **NON-PUBLIC MINUTES**

RESOLVED, that the non-public minutes of the meeting held on 14th September 2023 be approved

14. **OUTSTANDING ACTIONS**

The Committee received the non-public Outstanding Actions list.

15. **COLPAI VERBAL UPDATE**

The City Surveyor was heard.

16. **MIDDLESEX STREET COMMUNAL HEATING REPLACEMENT**

The Committee considered and approved a report of the Executive Director, Community and Children's Services.

17. **SYDENHAM HILL: WINDOWS AND COMMON PARTS REDECORATION**

The Committee considered and approved a report of the Executive Director, Community and Children's Services.

18. **HOLLOWAY ESTATE: WINDOWS AND COMMON PARTS REDECORATION**

The Committee considered and approved a report of the Executive Director, Community and Children's Services.

19. **GOLDEN LANE ESTATE (PHASE 2): WINDOWS AND COMMON PARTS REDECORATION**

The Committee considered and approved a report of the Executive Director, Community and Children's Services.

20. **WINDSOR HOUSE: WINDOWS AND COMMON PARTS REDECORATION**

The Committee considered and approved a report of the Executive Director, Community and Children's Services.

21. **SUMNER BUILDINGS AND AVONDALE SQUARE ESTATE**

The Committee considered and approved a report of the Executive Director, Community and Children's Services.

22. **ISLEDON HOUSE INFILL PROJECT**

The Committee considered and approved a report of the Executive Director, Community and Children's Services.

23. **QUESTIONS ON MATTERS RELATING TO THE WORK OF THE COMMITTEE**

There were no questions.

24. **ANY OTHER BUSINESS THAT THE CHAIRMAN CONSIDERS URGENT AND WHICH THE COMMITTEE AGREE SHOULD BE CONSIDERED WHILST THE PUBLIC ARE EXCLUDED**

There were no items of urgent business.

The meeting ended at 4.20pm.

Chairman

Contact Officer: Raquel.Pinto@cityoflondon.gov.uk

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Agenda Item 4

Title	Date Added	Pending Actions	Action Owner	Due Date	Update
COLPAI and Isleden House - Local Lettings Plan.	03/11/2022	A member requested that a visual map regarding overcrowding of social housing be provided.	Housing Needs Manager	November C&CS	Officers have compiled the data on overcrowding in the City and are compiling this data in a visual format.
Savills Review	13/03/2023	Briefing to be scheduled for members after May Committee if a breakfast briefing has not been arranged. A report on this to go to the HMASC Meeting.	Housing & Barbican	December C&CS	A report will be presented to C&CS Committee in December 2023.
Homelessness and Rough Sleeping Strategy 2023-27	03/05/2023	Further information is needed.	Head of Strategy and Performance	November C&CS	The strategy will come to November C&CS Committee.
CCS High Level Business Plan	03/05/2023	A members briefing needs to be arranged in respect to the 5-year business plan. A member requested for social mobility to be added to the plan.	Head of Strategy and Performance	January/February C&CS	The business plan will come to January/ February C&CS Committee.
CoL Women Project Update	27/07/2023	*Chair asked if consideration could be given to women with no recourse to public funds. *Clarity sought with respect to 'those who identify as women'. *Committee to receive further report at the end of the year, with a comprehensive business case, to demonstrate the impact of the CoL Women Project and secure its continuity.	Homelessness & Rough Sleepers	December C&CS	A report will be presented to C&CS Committee in December 2023.
Golden Lane Estate Community Safety Patrolling	27/07/2023	More frequent patrols by City Police/Parkguard requested.	AD Commissioning and Partnerships	December C&CS	Officers have submitted a bid to the Home Office for their 'safer streets fund' and if successful, this would enable the scheme to be widened.
Carers - Information and Advice	27/07/2023	*Carers would like to see a dedicated information/advice facility in the City of London. *Funding had been approved for a card which allows parent carers to jump queues at leisure activities and facilities. Members asked if similar could be made available for adult carers.	Head of Strategy and Performance	December C&CS	A report will come to C&CS Committee in December 2023.
Window Replacement	27/07/2023	Chair asked for a joint officer report of the Chamberlain and Housing consultants in terms of the HRA implications regarding whether windows replacements could be extended irrespective of age. A Housing Review was due to be complete in October, and committee would receive a report in November.	Housing & Barbican	December C&CS	A report will come to C&CS Committee in December 2023.
Middlesex Street Estate Communal Heating System	14/09/2023	Members requested that additional work be carried out within the next month, ahead of the delegated decision being taken. Further work to be completed to resolve queries below should include residents as well as officers - next iteration of report under delegated authority should include: i. The full extent of the works in terms of the electrical supply and feasibility. ii. The actual number of Leaseholders who might wish to opt out. iii. More clarity on the legal position. iv. Changes in the costings over the past 4 years. v. Information as to whether residents in other Local Authorities have opted out.	Housing & Barbican -	November C&CS	A briefing note was produced by Officers and this was shared and discussed at a meeting with Members. The meeting included two residents wishing to opt out.
Middlesex Street Estate Condition	14/09/2023	Estates in poor conditions. This could be remedied by withholding payment to contractors pending satisfactory inspections - followed by a 7-day period to enable residents to comment. AD of Housing to give further updates at next meeting.	Housing & Barbican	November C&CS	Officers have visited Middlesex Street and have implemented several actions to resolve some of the issues raised.
Housing specific winter measures	14/09/2023	Communications to be sent out to all regarding damp and mould to all on the estate.	Housing & Barbican	November C&CS	A 2 page article on damp and mould will be in the December edition of @home. All residents were sent the damp and mould leaflet earlier in the year. The corporate website is being updated with the latest news on damp and mould. A training session was held on 15th September 2023 on Damp, Mould and Condensation for non-technical staff.
Repairs and Maintenance Contract.	14/09/2023	The Head of special projects will run the procurement process and a draft timeline circulated to Members .	Housing & Barbican	Ongoing	Both contracts for Repairs & Maintenance currently with Wates (HRA) and Metwin (Barbican) will expire at the end of March 2024. A committee report requesting approval to proceed with a deed of variation for both contracts extending until the end of March 2025 is being prepared and will be presented for approval to Finance Committee and Procurement and Projects Sub Committee in December. It is unfortunate that a lack of oversight has caused this problem with insufficient time to re-procure in time for the current contract expiry date. To re-procure new contracts and consult with all stakeholders a deed of variation is required to maintain the current contracts until March 2025. It is recognised that the current contract performance is not optimal, and robust contract management will be required to ensure that the service improves whilst re-procurement is taken forward. A questionnaire will be distributed to all residents and stakeholders to obtain feedback on current arrangements, and soft market testing will be taken forward prepare the market to the opportunities of the new contracts, and to attract a high calibre of contractors and to set out our expectations for the service going forward.
Major Works Refurbishment - Golden Lane Estate	13/03/2023	Chair has requested for a 9-monthly update on the refurbishment works.	Housing & Barbican	December C&CS	This has been included in the reporting process for the project and the first report will be presented to C&CS in winter.
Tenant Satisfaction Measures	27/07/2023	*Housing KPIs (with TSMs) to be reported on, on a monthly basis WEF end of June 2023 *Consideration for a monthly HMASC sub-group to be set up, with delegated responsibility for scrutiny/sign off of KPIs and TSMs *Explore Options for tenant perceptions survey, report findings and recommendations to October HMASC	Housing & Barbican	(Monthly - Ongoing)	*Officers have appointed Acuity to carry out the tenant survey in preparation for the first regulatory return which is due in April 2024 *The survey will be carried out by telephone and online and will take place from 25 September to 21 October 2023 *Acuity will ensure that a minimum number of tenants are contacted to ensure the results are statistically significant *We are not required by the Regulator for Social Housing to survey leaseholders, however they will be included in the online survey to enable us to gauge satisfaction *The proposed performance sub-group of HMASC requires further discussion and ultimately a decision by Members on whether such a group should be constituted

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Agenda Item 5

Committee(s): Community and Children's Services Committee	Dated: 13 TH December 2023
Subject: Annual Review of the Committee's Terms of Reference	Public
Which outcomes in the City Corporation's Corporate Plan does this proposal aim to impact directly?	3, 8, 10
Does this proposal require extra revenue and/or capital spending?	N/A
If so, how much?	
What is the source of Funding?	
Has this Funding Source been agreed with the Chamberlain's Department?	
Report of: Town Clerk	
Report author: Committee and Member Services Officer	For Decision

Summary

The Annual Review of the Committee's Terms of Reference enables any proposed changes to be considered in time for the annual reappointment of Committees by the Court of Common Council. The Terms of Reference for the Community and Children's Services Committee are attached at Appendix 1.

Recommendations:

1. The terms of reference of the Committee (**set out at Appendix 1**) be approved, subject to any comments, for submission to the Court in April 2024; and,
2. Members consider whether any change is required to the frequency of the Committee's meetings.

Contact: julie.mayer@cityoflondon.gov.uk

COMMUNITY AND CHILDREN'S SERVICES COMMITTEE TERMS OF REFERENCE

To be responsible for:-

- (a) the appointment of the Executive Director of Community & Children's Services;
- (b) the following functions of the City of London Corporation (other than in respect of powers expressly delegated to another committee, sub-committee, board or panel):-
- i. Children's Services
 - ii. Adults' Services
 - iii. Education - to include the nomination/appointment of Local Authority Governors; as appropriate
 - iv. Libraries - in so far as the library services affects our communities (*NB - the budget for the Library Service falls within the remit of the Culture, Heritage and Libraries Committee but the Head of the Libraries Service reports to the Director of Community and Children's Services*)
 - v. Social Services
 - vi. Social Housing - (i.e. the management of the property owned by the City of London Corporation under the Housing Revenue Account and the City Fund in accordance with the requirements of all relevant legislation and the disposal of interests in the City of London Corporation's Housing Estates (pursuant to such policies as are from time to time laid down by the Court of Common Council)
 - vii. Public health - (within the meaning of the Health and Social Care Act 2012), liaison with health services and health scrutiny
 - viii. Sport/Leisure Activities
 - ix. Marriage Licensing and the Registration Service
- and the preparation of all statutory plans relating to those functions and consulting as appropriate on the exercise of those functions;
- (c) appointing Statutory Panels, Boards and Sub-Committees as are considered necessary for the better performance of its duties including the following areas:-
- Housing Management and Almshouses Sub-Committee
 - Safeguarding Sub-Committee
 - Integrated Commissioning Sub-Committee
 - Homelessness and Rough Sleepers Sub-Committee

- (d) excepting those matters reserved to the Court of Common Council or which are the responsibility of another Committee, all aspects of City of London Combined Relief of Poverty Charity (registered charity no. 1073660) and City of London Almshouses Charity (registered charity no. 1005857) and day-to-day management and administration of the charities. The Committee may exercise any available powers on behalf of the City Corporation as trustee under delegated authority from the Court of Common Council as the body responsible for exercising the powers of the City Corporation as trustee. This includes, but is not limited to, ensuring effective operational arrangements are in place for the proper administration of the charities, and to support expedient and efficient delivery of the charities objects and activities in accordance with the charities annual budget, strategy and policies.
- (f) making recommendations to the Education Board on the policy to be adopted for the application of charitable funds from The City of London Corporation Combined Education Charity (registered charity no. 312836) and the City Educational Trust Fund (registered charity no. 290840); and to make appointments to the Sub-Committee established by the Education Board for
- (g) the purpose of managing those charities.

the management of the Aldgate Pavilion.

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Committees: Community and Children's Services Committee – For Decision	Dated: 13/12/2023
Subject: Carers Strategy 2023-27	Public
Which outcomes in the City Corporation's Corporate Plan does this proposal aim to impact directly?	1,2,3,4
Does this proposal require extra revenue and/or capital spending?	N
If so, how much?	N/A
What is the source of Funding?	N/A
Has this Funding Source been agreed with the Chamberlain's Department?	N/A
Report of: Judith Finlay, Executive Director of Community and Children's Services	For Decision
Report author: Ellie Ward, Head of Strategy and Performance	

Summary

This report presents to Members a revised Carers Strategy for 2023 – 2027 for their approval. The Strategy sets the strategic priorities for the City of London Corporation (City Corporation) and guides our activities in relation to carers.

The term carers refers to unpaid carers. The Strategy focuses on adult carers of other adults or of children and young people with special educational needs and disabilities (SEND) where these needs are similar. The needs of parent carers of children with SEND specifically related to their individual caring experience and the SEND system will be addressed in the City Corporation's new SEND and Alternative Provision Strategy which will be developed in 2024. Young carers are considered in, and supported through, our Early Help strategy.

Carers were involved in the development of the strategy and the five priorities within it. An overview action plan has been produced to accompany the strategy. A 'you said, we did' document has also been produced which sets out what 'we' (the City Corporation) has done in response to carers ideas and feedback.

This paper summarises the strategy for Members' approval.

Recommendation

Members are asked to:

- Approve the Carers Strategy 2023-27.

Main Report

Background

1. There is no statutory duty on local authorities to produce a carers strategy but the City Corporation has followed many other local authorities in producing one. This reflects the City Corporation's recognition of the vital role that carers play and commitment to delivering the best possible support for them.
2. The development of the Carers Strategy involved engagement activities and evidence gathering which included a survey by the City Corporation's Peer Research Programme (resident research training) on cost of living and caring. This received 152 responses, 32 of which identified as carers. There was also a 12-week consultation exercise which included a dedicated consultation page on the City Corporation website, roundtable discussions with professional stakeholders and two focus groups with carers.
3. A summary document of some of the feedback, specifically from carers, is set out in a 'you said we did' document at Appendix 2.
4. The development of the Carers Strategy was overseen by the Carer Strategy Implementation Group (CSIG) which included five carers as well as professionals from across the Department of Communities and Children's Services (DCCS) and commissioned services; City Connections and the Carers Connections Service.
5. An action plan sits below the Strategy. This builds on the priorities and actions set out in the Strategy and provides a more detailed picture of what will be done to deliver against those priorities. Officers will explore with carers how they would like to be involved in reviewing the strategy and action plan.
6. The structure of the Carers Strategy reflects a move towards consistency of strategies developed by DCCS.

Current Position

Response to engagement and consultation feedback

7. The engagement and consultation activities provided the City Corporation with valuable insight into carers lives and what is important to them.
8. Research evidence highlights the value of caring to the economy but also the negative impact that caring can have on people in terms of finances, employment and health and wellbeing.
9. Carers in the City of London shared their positive and negative experiences of accessing support services. They told us about the negative impact caring has on their health and emotional wellbeing. We know the early identification of carers is important and carers told us that support at transition points, such as becoming a

carer, is key. Carers shared the problems they have in finding accessible information and the challenges in navigating complex health and care pathways.

10. Officers also spoke to carers about engagement and co-design. This gave officers insight which will be taken forward as part of the delivery of the Strategy, but it will also feed into a wider piece of work within the DCCS around engagement and co-design.

11. Insight gathered was used to identify five priority areas for the Strategy.

Priority areas

12. The Strategy sets out five priority areas:

- Tailored and universal services that work for carers.
- The health and emotional wellbeing of carers.
- Early identification of carers.
- Information and advice for carers.
- Engaging with carers.

Data

13. The Strategy cites various data sources to provide a picture of caring in England and the City of London.

Action plan

14. An action plan has been developed with carers to sit alongside the Carers Strategy. It builds on the priorities and activities set out in the strategy, providing further detail, accountability and impact measures. This can be found in Appendix 3.

Corporate & Strategic Implications

Strategic implications

15. The Carers Strategy's outcomes are designed to contribute to the delivery of the Corporate Plan 2018–2023 by aligning to these four outcomes:

Outcome 1: People are safe and feel safe.

Outcome 2: People enjoy good health and wellbeing.

Outcome 3: People have equal opportunities to enrich their lives and reach their full potential.

Outcome 4: Communities are cohesive and have the facilities they need.

16. The Strategy is also expected to align with outcomes set out in the new Corporate Plan which is currently being developed.

17. The Strategy sits below the Department of Community and Children's Services business plan and contributes to its delivery by mirroring its priorities and applying them to the needs of our carers.

18. The Strategy also supports, and is supported by, several other strategies and documents, such as:

- Joint Health and Wellbeing Strategy (in development).
- Adult Social Care Strategy (in development).
- Housing Management Strategy (in development).
- Early Help Strategy.

Financial implications

19. None identified

Resource implications

20. None identified

Legal implications

21. None identified

Risk implications

22. None identified

Equalities implications

23. An equality impact assessment has been completed and can be found in Appendix 4.

Climate implications

24. None identified

Security implications

25. None identified

Conclusion

26. The proposed Carers Strategy 2023-27 is the overarching strategic document that guides services and activity related to carers in the City of London. The priority areas will guide our work and vision for carers over the next four years. The City Corporation is committed to continuing to engage with carers throughout the lifetime of the Strategy to review progress and hold the City Corporation to account.

Appendices

- Appendix 1 – City of London Corporation Carers Strategy 2023-27.
- Appendix 2 – You Said, We Did document.
- Appendix 3 – Headline Action Plan.
- Appendix 4 – Carers Strategy 2023-27 Equality Impact Assessment.

Ellie Ward

Head of Strategy and Performance

Department of Community and Children's Services

E: ellie.ward@cityoflondon.gov.uk

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City of London Corporation Carers Strategy 2023-2027



The Care Act 2014 defines a carer as ‘an adult who provides or intends to provide care for another adult.’ This is unpaid and doesn’t include caring as part of a contract or as voluntary work for an organisation.

In this Strategy, the term ‘carers’ is used throughout to refer to unpaid carers. The Strategy primarily focuses on adult carers who live or care for someone in the City of London.

The City of London Corporation (City Corporation) recognises that parent carers of children and young people with special educational needs and disabilities (SEND) can share some similar needs to adults caring for another adult and some of these needs have been addressed in this Strategy. However, we also recognise that parent carers can experience specific needs relating to their individual caring experience and the SEND system. These needs will be considered as part of the development of a new SEND and Alternative Provision Strategy in 2024.

The City Corporation recognises that carers can care for relatives, friends, neighbours or their child with SEND, and that each caring experience is unique depending on the needs of the cared for and the carer themselves. We also appreciate that each carer may need different types and levels of support.

Young carers are considered in, and supported through, our Early Help strategy.

1 Introduction

The 2021 census estimates that there are 4.7 million carers in England.¹ Being a carer can have significant impacts for the carers’ health and wellbeing, finances and employment.

The Census 2021 states that there are 496 self-identified carers in the City of London.² However, not all of these carers have approached services for support and it is recognised that there are likely to be more who have not self-identified as carers.

The City Corporation is committed to supporting carers in their caring role and ensuring that the impact of caring on their lives is minimised.

This Strategy has been developed with carers and sets out priorities to focus our activity and shape our services for carers.

The Strategy helps to deliver our vision that:

Carers are identified and supported through the complexities of their caring journey and to deal with the impact caring can have on their own health and wellbeing.

Five priorities have been identified with carers that will drive our activity over the next four years to meet this vision:

- Tailored and universal services that work for carers.
- The health and emotional wellbeing of carers.
- Early identification of carers.
- Information and advice for carers.
- Engaging with carers.

An action plan will sit underneath this strategy to ensure that we remain on track but also responsive to change if needed.

A special thanks must go to carers in the City of London who have given up precious time to take part in surveys, engagement sessions and be part of the Carers Strategy Implementation Group (CSIG) which informed the development of this strategy. Carers will continue to be at the heart of delivering this strategy and in shaping our services.

2 Strategic context

This strategy sits within the context of national and regional policy, as well as a range of City Corporation strategies and responsibilities.

2.1 National

The UK Government sets the legislative framework for carers. This includes giving carers certain rights, for example through the Care Act 2014³, which is mainly for adults in need of care and support and their adult carers and includes the right to a carer's assessment based on the appearance of need. There is also the Children and Families Act 2014⁴ which gives young carers and young adult carers in England a right to a carers assessment and to have their needs met (if the assessment shows this is needed).⁵

Carers also have rights around employment. In 2023, the Carer's Leave Act⁶ was passed and the law will be enacted in 2024. This will introduce a flexible entitlement to one week's unpaid leave per year for employees who are providing or arranging care for a relative or dependent. The Employment Relations (Flexible Working) Act 2023 gives carers the right to request flexible working from the first day of their employment.⁷ The Human Rights Act and the Equality Act 2010 can also relate to carers rights, for example 'a carer cannot be discriminated against on the basis of their association with a disabled person.'⁸

Key components of the Care Act 2014 are prevention, assessment and support. The Act sets out the entitlements for adult carers to have a carers assessment when it appears they have a need for support. They are then entitled to this support if they meet the national eligibility criteria. Similarly, the Children and Families Act 2014⁹ gave young carers and young adult carers in England a right to a carer's assessment and to have their needs met. This would be managed within the Children and Families Service at the City Corporation.

In Dec 2021, the Government published a White Paper (a policy paper that sets out plans for reform) on wider adult social care called 'People at the Heart of Care'.¹⁰ This included a focus on unpaid carers. It aimed to 'empower' unpaid carers by focusing on three core strands: services to support unpaid carers; identifying, recognising and involving unpaid carers; and supporting the economic and social participation of unpaid carers.

The Health and Care Act 2022¹¹ amended some of the measures in the Care Act 2014 and gave the Care Quality Commission (CQC) new powers around inspecting care at a local authority and Integrated Care System (ICS) level. A new single assessment framework uses quality statements to assess levels of care. This includes looking at how carers are involved in planning, managing and making decisions for those that they care for. It also considers how local authorities co-produce person-centred care with carers and how carers are treated as equal partners.

The NHS Long Term Plan in 2019¹² includes a commitment that carers will benefit from greater recognition and support.

Each year, the Department of Health and Social Care (DHSC) undertakes a national survey of adult carers in England (SACE) which considers the impact of caring on individuals.

2.2 Regional

The Health and Care Act 2022 placed a duty on NHS hospital trusts to ensure that unpaid carers of all ages are involved as soon as feasible when plans for the patient's hospital discharge are being made. In response to this duty, the London Association of Directors of Adult Social Services (ADASS), Carers UK and other partners co-produced the London Carers Hospital Discharge Toolkit for hospitals and community providers. The Toolkit was launched in March 2022 and aims to help providers improve the experiences of carers during hospital discharge or during an admission or discharge to a virtual ward.¹³

The East London NHS Foundation Trust (ELFT) provides integrated community and mental health services for people living in the City of London. ELFT's Carers, Friends and Families Strategy (2022-2026)¹⁴ focuses on the needs of carers and people using ELFT services. It was co-produced with carers and staff and sets out five priority areas:

- Improve identification and recognition of carers including young carers.
- Staff should be aware of carers and trained to engage with carers effectively.

- Clear pathways to access support for carers and help in a crisis.
- Clearer voice and involvement.
- Ensure the right support is in place for carers.

ELFT is also running a training programme for its workforce about carers focusing on ensuring content is sought, as matter of course, to share information with carers; and then to ensure that the carers' expertise is taken into account when developing Care Plans.

It is also a requirement of the Better Care Fund (BCF) that some of the joint funding between the North East London Integrated Care Board (health) and the City Corporation is spent on providing support to carers.

2.3 Local

The City of London is unique in its size and position; 8,600 residents living in the square mile that is surrounded by seven local authorities. The number of residents in the City of London has increased by 16% since 2011. The majority are working age but there are 1200 people (14%) who are aged 65 and over. Although the percentage of population aged over 65 has stayed the same between the censuses, the actual number of people has increased. 51% of households in the City of London are one person-households.¹⁵

Life expectancy in the City of London is better than both the London and England average¹⁶ and the City Corporation aims to help people stay at home as independently as possible for as long as possible.

The City Corporation's activity is driven by our Corporate Plan; a new one is due to be published in 2024. The Department for Community and Children's Services Departmental Business Plan includes outcomes around safety, choice and independence, health and wellbeing and community.

This Carers Strategy sits within the context of the Corporate and Departmental Business Plans. It also sits alongside other City Corporation strategies including the Early Help Strategy and the emerging Adult Social Care Strategy, Housing Management Plan and the Joint Local Health and Wellbeing Strategy. The City Corporation SEND Strategy for children and young people 2020-24 will expire in 2024 and a new SEND and Alternative Provision Strategy will be developed. This will include parent carers specific needs within the context of those systems.

The City Corporation commissions some services directly, such as a carers support service, but there may also be some services and provision for resident carers that are commissioned by other partners, such as the Integrated Commissioning Board or local health place based partnership, that covers both the City of London and Hackney.

3 Background

3.1 Carers and the caring journey

The Care Act 2014 defines a carer as ‘an adult who provides or intends to provide care for another adult.’ This is unpaid and doesn’t include caring as part of a contract or as voluntary work for an organisation.¹⁷ We recognise that carers can care for relatives, friends, neighbours or children and young people with SEND. We also know that people can become carers at any point. As carers told us:

“You can fall into caring. [It’s] some people’s regular life.”

“My life changed overnight for three months.”

Many carers don’t see themselves as such and it can be difficult to separate their caring role from the relationship they have with the person they are caring for. Carers are unique and can provide a range of support including help with daily tasks such as getting out of bed and personal care such as bathing, to emotional support such as helping someone who has mental health issues.¹⁸ This is different to a paid carer who is employed by social care services to provide support to people in their homes. This can be known as homecare, domiciliary care or home help.¹⁹

A range of national research and evidence gives a flavour of who carers are and the impact it can have.

Demographics:

- 59% of carers are women. Women are more likely to become carers and to provide more hours of unpaid care than men.²⁰
- 27% of carers said they had a disability.²¹
- Carers from a Black, Asian and ethnic minority background were more likely to be struggling financially than White carers (37% vs 27%).²²

Health and wellbeing:

- 30% of carers said their mental health was bad or very bad.²³
- 60% of carers report a long-term health condition or disability compared to 50% of non-carers.²⁴
- 29% of carers feel lonely often or always.²⁵

Employment:

- 44% of working-age adults who are caring for 35 hours or more a week are in poverty.²⁶
- 75% of carers in employment worry about continuing to juggle work and care.²⁷

It has also been suggested that the challenges faced by carers, such as managing stress and responsibility, negative impacts on their physical and mental health, and not being able to take time away from caring, were intensified by the pandemic.²⁸

The cost of living crisis has continued to exacerbate problems; 25% of carers are cutting back on essentials like food or heating and 63% are extremely worried about

managing their monthly costs. Furthermore, 27% said they were struggling to make ends meet.²⁹

3.2 Carers in the City of London

I care for my wife. We have been together for 45 years. Seven years ago, she developed health problems which make it difficult for her to socialise, travel or enjoy leisure activities.

She needs little personal care but I have to do almost all of our domestic chores, including cooking all our meals from scratch because of her stomach/gut issues. I accompany her on a short walk most days and go with her to medical appointments.

I am in good health and would be able to see my friends occasionally or go for long walks. However, cautious attempts to do this remind her of what she can't do, so I restrict my outings to food shopping, short walks for exercise and attending carers groups and drop-in sessions.

Caring for my wife gives me pleasure and a sense of purpose. I have acquired new skills and learnt to be very patient and tolerant. However, adapting to her changes in behaviour has been challenging, and losing our social life, the regular visits to our children and grandchildren and other activities has been difficult to cope with. My social contacts are now mainly with other carers, who don't talk about all the things we can't do. And, most important, the weekly drop-in sessions with our wonderful carer support worker keep me going.

Every caring experience is unique. Carers have told us how a caring experience can depend on the individual carer and the needs of the person being cared for. It could involve different levels of care at different life stages. Carers also shared how people can transition in and out of being a carer, and experience key transitions during that time, e.g. their cared for going into residential care or experiencing an improvement in their health.

We include some case studies of people who are carers in the City of London throughout this section. These are from carers who have agreed to share their experiences as part of the strategy. We recognise that they might not reflect all caring situations but we hope that they provide an insight into some carers' lives.

I care for my dad. This can involve making each meal, helping him shower, taking him shopping, taking him for walks and out for the day. Going to hospital and doctors appointments. Sitting in A&E with him. Ordering medication, dealing with telephone calls and important documents. Making sure someone is with him 24 hours a day now. Going on holidays. Arranging care if I want to go away with my husband or if I'm unwell.

For me, being a carer means my dad is getting the best care. I know his likes and dislikes. He isn't limited to a time having carers coming in and different people coming in daily who don't know him. I'm able to do the things he likes, maybe sit and chat about memories and good times we had, but also sit quietly watching TV sometimes. I also get to spend precious time with my dad and we are still making memories. Something I can cherish later on.

There are 496 self-identified carers (6% of the population) in the City of London. Nearly a third of these, (32%) provide 20 or more hours of unpaid care a week. 298 of these carers are aged over 50.³⁰

At the start of October 2023, 33 carers were being supported by the City Corporation's Adult Social Care team. The average age of carers (of the 29 carers for whom we know the age) was 61. Of those 29 carers: 3 were 18-30 years old, 3 were 31-50 years old and 14 were 51-70 years old. 9 were 70 years old and over (of which 4 were over 80 years old).

Findings for the City of London from the national carers survey in 2021-22³¹ (23 respondents) told us:

- 13% of carers did not find it easy to find information about services.
- The average Quality of Life score for carers was 7.3 (out of 12) which matched the national average and was higher than the inner London average of 7.0.
- 44% of carers who had received support or services were extremely or very satisfied with Social Services. This compares to 36% nationally and 33% in inner London.

The City Corporation's Peer Researcher Programme ran a survey which included questions regarding caring. In June 2023, 152 residents had replied, of which 39 identified as carers. These carers told us that:

- 26% sometimes or always feel lonely in their role.
- Over half stated that their mental and physical health sometimes stopped them from carrying out their caring role.

I care for my mother who is 90 and who has advanced Dementia and share her full-time care with my partner. This can involve assistance with feeding, personal care and toileting on a 24-hour basis. It can also involve domestic care tasks, e.g. laundry, cleaning and cooking... administrative tasks dealing with benefits, financial management... liaising with healthcare professionals e.g. GP surgeries, district nurses, community mental health services. We also liaise with social services and care agencies who provide care.

For me, providing care is my main priority and provides me with reassurance that my mother is being cared for properly and is nourished emotionally and physically as much as possible. Whilst difficult and has resulted in many sacrifices, it has proved the most worthwhile, rewarding and meaningful experience of my life so far.

I care for my 20-year-old son who has very complex, severe epilepsy. This involves organising his medication including raising money to pay for it every month. He is seizure free on this medication but has days when he's very tired and can't look after himself. We both suffer from PTSD (post-traumatic stress disorder) from the years of uncontrolled seizures and he needs a lot of emotional support.

For me, being a carer means always being available to help my son on the bad days and he still can't be left alone at nights because of the risks of SUDEP (sudden unexpected death in epilepsy). And my life involves organising any dealings with clinicians and struggling to afford to pay for the medication which keeps him well.

I care for my 91-year-old neighbour/friend who has Alzheimer's. She recently moved permanently into a care home following discharge from hospital as [she] now needs 24-hour care. Prior to her moving to the care home, it involved me seeing her nearly every day, taking her shopping, ensuring that she ate properly and being on call in emergencies which increased as her Alzheimer's progressed.

For me, my need to care for her has changed as her physical needs are now taken care of by the home so I'm not so physically tired. However I remain her closest contact. I am still the emergency contact for the care home so I visit regularly, take her to hospital appointments, look after her flat until it is vacated, post etc, and ensure she has all she needs. There is still the possibility that I can get an urgent call at any time from the care home should my friend fall or be ill bearing in mind her age etc, so I still worry about her.

City Corporation services

The City Corporation's Adult Social Care, Children's Social Care and Early Help teams fulfil our legislative duties in relation to carers. Where respite care is required, this is assessed and considered for the cared for person.

The City Corporation commissions a number of services including City Connections with a sub-contract Carers Connections (providing specific support to adult carers including information and advice about their caring role as well as general wellbeing activities and drop-in sessions which have also been attended by some parent carers) and City Advice.

The Carers Connections service was a pilot run by City Connections which is now continuing. The service was accessed by 80 unique carers between October 2022 and September 2023. 46 of those were previously unknown to City Connections. Of the 80 carers:

- 36 were White British and 24 were Bangladeshi. The remainder were a mix of ethnicities.
- 58 were female and 22 were male.
- 16 were aged between 35-44 years old, 14 were aged between 45-54 years old and 15 were 55-64 years old.
- The majority (65) did not report having a disability.

Between July and September 2023 there were 10 unique carers accessing the services, all of which had been previously unknown to City Connections. Overall, there were 179 contacts with carers including four carers assessments completed by the City Corporation's adult social care team, 26 contacts through peer support sessions and 34 1-2-1 support talk sessions in person or on the phone.

Feedback received from carers by the Carers Connections service has included:

- [The project manager] has helped me talk about my emotional and mental health needs as a carer... I am happy that they speak Bengali, easier to communicate.
- The carers connection service has allowed us to connect as a community and peers.
- Although the resources are limited, I am grateful for the services provided... As a carer it can still feel isolating in the City of London but the knowledge that individuals such as [the project manager] and places like Portsoken [Community Centre] are available provides a sense of comfort.
- I was signposted to [another] organisation by [the project manager] which I never knew existed.

A City Wellbeing Centre provides psychological support services to City of London residents and workers on an innovative pay model. Within this, there was a pilot to provide a counselling service to carers although carers felt that this wasn't carer specific enough and take up was low.

Overall, support through these services includes:

- General wellbeing support and minimising of social isolation.
- Navigating and accessing the health and social care system.
- Welfare rights and benefit entitlement advice.

Carers have told us that there are some gaps in services and that there could be some strengthening in relation to carers needs. These will be considered as part of the action plan and specifically as part of the recommissioning of Carers Connections, the carers support service.

3.3 Our strengths

- Strengthened understanding of City of London carer needs and identification of more carers, particularly in the east of the City of London, through specific Carers Support Service and Peer Researcher Programme.
- Focus on improved practice with carers in the Adult Social Care service by introducing a carers assessment guide and training of staff (there will continue to be a focus on this so that improvement is continuous).
- Targeted support for carers through a carers support service.
- This strategy was developed with carers.
- All carer assessments in the City of London are carried out by qualified social workers.

3.4 Our challenges

- Ensuring consistency of knowledge around carers across frontline staff.
- Ensuring our information is kept up-to-date, accessible and inclusive for our diverse group of residents.
- Ensuring carers are supported by professionals to access the full range of information and services available (specifically carers who are registered with Tower Hamlets GP Practices are aware of, and able to access, support as a carer in the City of London).
- Sharing information and building networks within the voluntary and community sector.
- Services working with carers – including health, local authorities and voluntary sector services - are facing significant pressures.
- Building on what is already in place to strengthen our co-production work with carers.

4 Progress since the last strategy

The City Corporation's key achievements since the last Carer Strategy 2019-23 include:

- Establishment of the CSIG which includes five carers. This meant carers' voices were heard in the delivery of the 2019-23 strategy and formation of this new strategy.

- Strengthened our offer for unpaid carers through Carers Connections, a sub-contract of City Connections, which involves a dedicated coordinator supporting carers. This has resulted in more carers being identified and supported.
- Gained a better understanding of unpaid carers within our Bangladeshi community through Carer Connections and the Peer Researcher Programme. This insight will inform the recommissioning of the Carers Connections service.
- Worked with carers to improve our offer through the pandemic, including Adult Social Care-funded Zoom licenses for an informal carers peer support group.
- Worked with the CSIG to make the City Corporation website more accessible to carers.
- Adopted a Parent Carer Strategy in our Children’s Social Care and Early Help teams.
- Created and adopted a Parent Carer Needs Assessment template for use in Children’s Social Care and Early Help.
- Applied an uplift to carers individual budgets, benchmarked against other local authorities. This resulted in payments increasing and levels of payment widened so that more carers received payments.
- Completed a Carers Assessment guide and checklist, and delivered a Carers Assessment training session for Adult Social Care staff. The guidance has been embedded in practice and improved the way staff work with carers.
- Trialled a specific carers counselling service as part of the City Wellbeing Centre.

5 Developing this strategy

This strategy has been developed with carers as well as wider engagement and consultation with key stakeholders.

There was a 12-week consultation exercise which involved roundtables with stakeholders and specific focus groups with carers.

A range of data and evidence was also analysed including findings from the Peer Research surveys.

This engagement enabled us to identify the priorities for this strategy. They reflect what carers have told us and how we think we can make the most difference as the City Corporation.

6 Priorities

The five strategic priorities for this strategy are:

- Tailored and universal services that work for carers.
- The health and emotional wellbeing of carers.
- Early identification of carers.
- Information and advice for carers.
- Engaging with carers.

6.1 Priority 1: Tailored and universal services that work for carers

Carers have told us that they want community services that reflect carer needs around health and social care navigation, financial advice and wellbeing support.

“We’ve lost all our social life and all our holidays, it’s like living in a permanent lockdown, we haven’t been on holidays in years. What I long for is human contact, information is useful.”

“What they need is an emergency plan, you have a card with you that social services can see if something happens to you.”

We know that carers are the experts by experience and to provide the best possible experiences for carers we need to co-design services. We want to build on how we have engaged carers in the development of this strategy, and extend this approach to different areas. We also know that by co-designing services, we can better reflect and meet the diversity of need among carers. This directly links to priority 4.

To deliver on this priority over the next four years, we will:

- Co-design the core offer to carers and improve the way organisations work together to provide more joined-up support for carers.
- Support carers to have a plan in place in the event of an emergency where they are unable to provide care.
- Ensure that carers in employment can access the support services they need.

Key actions to deliver these priorities include:

- Recommissioning the Carers Support Service, reflecting carers’ views and needs (including those in employment).
- Connecting carers to a wider range of relevant activities and support to reduce social isolation and promote wellbeing.
- Exploring a carers emergency card and plan scheme, and any discount schemes for carers.

Key measures of success are:

- Recommissioned Carers Support Service is co-designed with carers.
- Number of carers linked / referred to other services.
- Number of carers taking up any agreed emergency card and plan scheme.

6.2 Priority 2: The health and emotional wellbeing of carers

Carers told us that caring can have a significant impact on their health and emotional wellbeing, and that this can be experienced in different ways depending on the individual. Carers also told us that transition points, such as becoming a carer, when the cared for goes into a home or when caring responsibilities cease, can be particularly hard and negatively impact on their health and emotional wellbeing.

“As a carer what I need is emotional support. If all I get is information, it feels like a scarily empty statement to me.”

“Support for my own physical well-being”

We want to better support carers with their health and emotional wellbeing, and have focused on specific activities that the City Corporation can influence. Some of the support available to carers around health and emotional wellbeing is commissioned by the Integrated Care Board or the City and Hackney Place Based Partnership which covers both the City of London and Hackney. This priority crosses over with priorities 1 and 3.

To deliver on this priority over the next four years, we will:

- Ensure that carers residing in the City of London can access and benefit from health and emotional wellbeing services offered in the City of London and that may be linked to neighbouring boroughs.
- Explore how the gaps in service provision around carers’ health and emotional wellbeing either can be met through targeted or universal support, particularly around key transition points.
- Improve carers’ social connectivity so they feel part of their local community.

Key actions to deliver these priorities include:

- Ensure that wider services which are commissioned for City and Hackney residents can be accessed by City of London carers.
- Addressing identified gaps in existing provision and considering this as part of, or outside of, the recommissioning of the carers support service.
- Connecting identified carers with targeted and universal provision so they feel part of the community and less isolated.

Key measures of success are:

- Health and emotional wellbeing services have a physical presence in the City of London.
- Carers can access and benefit from a range of health and emotional wellbeing services commissioned as part of the wider health and care system.
- Carers tell us they feel less isolated.

6.3 Priority 3: Early Identification of carers

Carers have told us that they want frontline workers across health, social, community and education services to be able to identify unpaid carers, respect carers’ experiences and offer support where appropriate.

“If somebody from housing finds out there’s a family struggling with care, are they passing that on?”

Carers have highlighted to us the importance of the experience of their contact with frontline workers and we know the crucial role these workers can play in identifying

and meeting carers' needs. We want to build on our existing provision and work with partners to make this the best possible experience for carers in the City of London.

To deliver on this priority over the next four years, we will:

- Ensure professionals are trained and supported to proactively identify and recognise carers.
- Ensure carers are supported by professionals to access the full range of information and services available.
- Support people to recognise when they are in a caring role and where to seek help.
- Identify where systems could work together more effectively so that carers do not have to keep telling their story to different services.

Key actions to deliver these priorities include:

- Providing training and induction activities to support professionals' awareness and knowledge of carers.
- Embedding working with carers into the standard operating procedures across the City Corporation and partner organisations.
- Improving information sharing between professionals and community services to support the identification of carers.

Key measures of success are:

- Increased number of carers identified.
- Increased number of frontline workers trained in Making Every Contact Count (with carer focus).
- Carer awareness embedded in induction programmes across different organisations.

6.4 Priority 4: Information and advice for carers

Carers have told us that they need easy access to information to help them look after the person they care for and to look after themselves. Carers also told us about the importance of knowing what to do in a crisis so that the person they care for will be safe and looked after.

“You’re left all on your own, you don’t know where to go for services unless you meet another carer. You go home and Google everything.”

“I don’t know where to find information. We don’t have a good website or anywhere that can help. I need something but I don’t know what it is and I don’t know what you’ve got.”

Accessible, up-to-date information is crucial for anyone trying to navigate health and social care. For carers, this is no exception. The City Corporation has a role to play in providing this information in a way that carers can access, understand and, in some cases, take action based on what is provided.

To deliver on this priority over the next four years, we will:

- Ensure that City Corporation information around carers is consistent, relevant, accurate, accessible and regularly updated.
- Support carers to acquire, develop and maintain digital skills to be able to access information and support.
- Provide information about what to do in a crisis so that carers feel confident that, should something happen to them, the person that they care for will be safe and looked after.

Key actions to deliver these priorities include:

- Reviewing and updating City Corporation information around carers so that it is accessible and communicated through a variety of channels. Carers will be involved with this and will tell us to what extent they want to be involved.
- Ensuring carers are signposted to information on specific health conditions and relevant services.
- Ensuring that carers can access training and support to increase internet and digital confidence.

Key measures of success are:

- Positive feedback from carers on accessibility and relevance of information provided.
- Number of carers receiving crisis information.
- Number of referrals to digital training and support; number of carers who report that they are now more digitally confident.

6.5 Priority 5: Engaging with carers

Carers have told us that they want to be recognised as experts by experience and co-design community services for carers.

“Carers are the people coming with the expertise, they should listen to us.”

We recognise that we can strengthen engagement with carers and ensuring they have influence in the design and development of strategies and services to meet their needs. We want to build on the engagement involved in developing this strategy and previous services such as Carers Connections, and extend this approach to different areas. By co-designing services we want to better reflect and meet the diversity of need among carers.

To deliver on this priority over the next four years, we will:

- Strengthen engagement and co-design with carers (as part of a wider programme looking at engagement and co-design across the Department for Community and Children’s Services).
- Extend our reach to engage with more carers in our community.
- Respect and value the expertise of carers.

Key actions to deliver these priorities include:

- Co-designing the recommissioned carers support service.
- Agreeing with carers where and what level of involvement they have in activities such as the design and delivery of carer information and training for professionals.
- Developing the reward and recognition process for different engagement levels and activities (part of wider departmental work).

Key measures of success are:

- Recommissioned Carers Support Service is co-designed with carers.
- Carers feel valued and heard in a range of engagement activities agreed with them.
- An agreed approach for reward and recognition across the Department of Community and Children's Services that reflects a range of engagement and co-design levels and opportunities.

7 Implementation and delivery

The strategy and associated action plan will be reviewed on an annual basis. Officers within the Department for Community and Children's Services will work with carers to agree how they want to be involved in that process. We want to give all carers in the City of London who want to, the opportunity to engage so we will be looking at a range of activities to reach a diverse group of carers. We will also agree ways in which carers can share insight and thoughts on progress between the annual reviews so that it is not just a once-a-year opportunity.

Any legislative change will result in changes to the action plan and delivery of services if applicable within the annual review period. The strategy and action plan will also be reported on to Members, through the Community and Children's Services Committee.

This City Corporation Carers Strategy sits within the context of national legislation and regional and local drivers to improve support for carers. It also supports the delivery of objectives in the Corporate Plan and the Department of Community and Children's Services Business Plan.

I care for my mum, she's 92-years-old and has mobility issues due to age-related frailty and a disability via a permanent tremor which precludes her from carrying anything, cooking, even making a cup of tea. I have cared for her for 12 years.

This can involve a lot of practical help on a daily basis, starting with commode emptying and showering in the morning to shopping for and making all meals and drinks each day. It means that I run both of our homes with all associated admin, housekeeping and practicalities. I'm mum's cook, chauffeur, hairdressers, personal shopper, tech adviser and life organiser. I take care of all health related matters, making judgement calls, attending appointments, following up, ensuring a seamless flow of medication, aids and adaptations and health supplements. I am entirely responsible for all outings from home, social, medical, holidays and entertainment. Since a bad fall necessitating a hip replacement five years ago, mum only has confidence to leave the flat with me. If I don't take her out, she's marooned at home. I am confidante, sounding board and 360 degree emotional and psychological support.

For me, being a carer means being extremely well organised. It means putting another person's needs before my own. It means accepting that my own health and wellbeing take a backseat. That my last holiday was in 2016. That my social life is in the main conducted by phone. That friends outside London haven't been seen for many years. That the number of hours available for work have had to reduce and my income has dropped to a point where I'm needing to move home and downsize as I can no longer afford my outgoings. Being a carer also means knowing I'm doing my very best for the person I love most in the world. It means seeing a sweet, smiling face every day. It means being humbled by knowing a loved one so intricately and intimately. It meant having daily company through lockdowns! It means a lot, lot, lot of love.

Endnotes

- ¹ Figure taken from Census 2021 available at: <https://www.ons.gov.uk/peoplepopulationandcommunity/healthandsocialcare/socialcare/articles/unpaidcarebyagesexanddeprivationenglandandwales/census2021>
- ² Statistics taken from Office for National Statistics (2023) Provision of unpaid care. Available at: <https://www.ons.gov.uk/datasets/TS039/editions/2021/versions/3>
- ³ Information on the detail of the Care Act 2014 is available via: <https://www.legislation.gov.uk/ukpga/2014/23/contents/enacted>
- ⁴ Information on the detail of the Children and Families Act 2014 is available via: <https://www.legislation.gov.uk/ukpga/2014/6/contents/enacted>
- ⁵ Further information on the legal context can be found on the Carers Trust website at: <https://carers.org/carers-and-the-law/carers-and-the-law>
- ⁶ Further information on the Carer's Leave Act 2023 is available on the Carers UK website: <https://www.carersuk.org/for-professionals/support-for-employers/the-carers-leave-act/>
- ⁷ Carers First (2023) Working Carers: The Employment Relations (Flexible Working) Act 2023 receives Royal Assent. Available via: <https://www.carersfirst.org.uk/news-and-stories/working-carers-the-employment-relations-flexible-working-act-2023-receives-royal-assent/>
- ⁸ Further information on carers rights under the law is available via: <https://carers.org/carers-and-the-law/carers-and-the-law>
- ⁹ Information on the detail of the Children and Families Act 2014 is available at: <https://www.legislation.gov.uk/ukpga/2014/6/contents/enacted>
- ¹⁰ Department for Health and Social Care (2021) People at the Heart of Care: Adult Social Care Reform White Paper. Available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1061870/people-at-the-heart-of-care-asc-reform-accessible-with-correction-slip.pdf
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- ¹² NHS England (2019) The NHS Long Term Plan. Available at: <https://www.longtermplan.nhs.uk/publication/nhs-long-term-plan/>
- ¹³ Further information on the NHS London Carers Hospital and Discharge Toolkit is available at: <https://www.england.nhs.uk/london/our-work/carers-and-hospital-discharge/>
- ¹⁴ East London NHS Foundation Trust (2022) Carers, Friends and Families Strategy (2022-2026). Available at: <https://www.elft.nhs.uk/contact-us/contact-carers-leads>
- ¹⁵ ONS (2022) Household and resident characteristics, England and Wales: Census 2021. Available at: <https://www.ons.gov.uk/peoplepopulationandcommunity/householdcharacteristics/homeinternetandsocialmediausage/bulletins/householdandresidentcharacteristicsenglandandwales/census2021>
- ¹⁶ Public Health England (2017) City of London Health Profile 2017. Available via: <https://democracy.cityoflondon.gov.uk/documents/s86130/06%20-%20Appendix%20-%20City%20of%20London%20Health%20Profile%202017%203.pdf#:~:text=Life%20expectancy%20in%20City%20of%20London%20at%20birth,from%2076.2%20in%202001-03%20to%2079.4%20in%202012-14>
- ¹⁷ Further detail on the definition of carer within the Care Act 2014 is available via: <https://www.legislation.gov.uk/ukpga/2014/23/section/10/enacted>
- ¹⁸ NHS commissioning for carers information accessed on 18 September 2023. Available at the time at: <https://www.england.nhs.uk/commissioning/comm-carers/carers/>
- ¹⁹ Information on help at home from a paid carer. Available at the time at: <https://www.nhs.uk/conditions/social-care-and-support-guide/care-services-equipment-and-care-homes/homecare/>
- ²⁰ Carers UK facts and figures accessed on 2 October 2023. Available at the time at: <https://www.carersuk.org/policy-and-research/key-facts-and-figures/>
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- ²⁷ Carers UK (2022) State of Caring 2022: A snapshot of unpaid care in the UK. Available at: https://www.carersuk.org/media/vgrixkcs/soc22_final_web.pdf
- ²⁸ Care Quality Commission (2022) Increased strain on carers. Available via: https://www.cqc.org.uk/publications/major-reports/soc202021_01f_increased-strain
- ²⁹ Carers UK (2022) State of Caring 2022: A snapshot of unpaid care in the UK. Available via: https://www.carersuk.org/media/vgrixkcs/soc22_final_web.pdf
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- ³⁰ Statistics taken from Office for National Statistics (2023) Provision of unpaid care. Available at: <https://www.ons.gov.uk/datasets/TS039/editions/2021/versions/3>
- ³¹ NHS Digital (2022) Personal Social Services Survey of Adult Carers in England 2021-22 available at: <https://digital.nhs.uk/data-and-information/publications/statistical/personal-social-services-survey-of-adult-carers/england-2021-22>

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Carers - you said, we did November 2023

Various engagement activities with carers took place during the development of the City of London Corporation (City Corporation) carers strategy and action plan. The City Corporation's commissioning team also engaged carers to inform the recommissioning of the carers support service.

The City Corporation values and appreciates the time and expertise that carers gave to this and recognises that it is important to provide feedback not only where we have taken forward carers' ideas, but also where we haven't.

The tables and content in this document provide this feedback in a 'you said, we did' format; where 'you' relates to carers in the City of London and 'we' relates to the City Corporation. We share where we have acted on feedback and where we plan to act on feedback. We also set out how we have responded to feedback or ideas that came up during our engagement activities but sit outside of the strategy, action plan and recommissioning of the carer support service. The tables included are:

- Table 1: Carers strategy.
- Table 2: General comments.
- Table 3: Carers action plan.
- Table 4: Recommissioning of carers support service.

We hope that carers in the City of London recognise their feedback and insight in the below, however, if not please email Hannah Dobbin, Strategy and Projects Officer – hannah.dobbin@cityoflondon.gov.uk – who can have a look and provide a response for you.

Table 1: Carers strategy

You said (Carers)	We did (City Corporation)	Lead
Supporting carers' health and emotional wellbeing is vital. We want more support in the City of London, including physically based in the City of London, such as the City and Hackney Recovery College and Crisis Café.	<p>We added the health and emotional wellbeing of carers as a priority within the strategy.</p> <p>The action plan reflects ensuring accessibility to a range of services that are available to carers. Wider provision of services which should be available in the City of London such as the Recovery College and the Crisis café will be raised separately as part of our wider work.</p>	Strategy and Performance team
Support for carers ends if the carer ceases to have caring responsibilities. For example, if the cared for moves to a nursing home or dies. Support should continue to be available to the carer to help them manage this period of transition, that shouldn't be seen as the end of the carers journey.	<p>We recognise that this can be a difficult time for carers and support shouldn't just stop if caring responsibilities end. We amended the strategy to better reflect a focus on support during key transition points.</p> <p>We will also be clearer in the recommissioning of the carers support service about who the service is available to.</p>	Strategy and Performance team
We want an emergency carer card to let emergency services know we have cared for at home or school and be linked to an emergency plan held by City of London/NHS. We would also like a card to access discounts with retailers.	We have included exploring an emergency carers card and plan as a key action within the strategy. We will also explore a discount card with retailers.	Strategy and Performance team

You said (Carers)	We did (City Corporation)	Lead
Better reflect true extent of co-production in developing the strategy and work to improve engagement with carers going forward.	We have changed the language used around carer engagement within the strategy. We are also looking at co-production more broadly across the Department for Community and Children's Services and how we can strengthen this.	Strategy and Performance team
If you include the digital skills in the strategy, what about providing carers who need them with laptops and internet?	<p>We previously joined a scheme which provided laptops to residents who required them along with internet access options (dongles). There was low uptake of these schemes but we have ensured that there is free access to computers in the Community Centres (Golden Lane and Portsoken).</p> <p>We are currently reviewing all the different digital skills support that is available in the City of London and the strategy includes actions to support carers to be able to access this.</p>	Strategy and Performance team
The City Parent Carer Forum felt that the Carers Strategy excluded parent carers and that the City Corporation's Early Help and SEND Strategies do not address parent carers' needs.	Parent carers in the City of London are valued and therefore we have amended the wording in the Carers Strategy so that it is clear that parent carers are included in our understanding of carers within the context of this Strategy and its priorities. We have also amended the Strategy to better reflect our plans that the SEND strategy will be updated in 2024 and will include parent carers needs related to the SEND and alternative provision systems. In addition, we acknowledge that it is young carers who are mainly represented in the Early Help strategy.	Strategy and Performance Team

Table 2 – General comments

You said (Carers)	We did (City Corporation)	Lead
<p>There is a need for a residential nursing/care home in the City of London for our cared ones. This facility could be made available to both City of London residents and workers. It would also avoid everyone having to travel outside of the City of London and enable them to stay within their established support networks and allow the carers to still be part of their recognised community.</p>	<p>Residential care in the City of London is an issue that gets raised periodically. Provision of residential care is a complex issue but we keep demand and options for all accommodation-based provision under review.</p> <p>A paper setting out the situation and complexities of providing residential care in the City of London will be developed shortly.</p>	<p>Strategy and Performance Team</p> <p>Commissioning Team</p>
<p>What about carers who care for someone outside of the City of London? Sometimes your community of support can be where you live rather than where you care for someone.</p>	<p>The Care Act is clear that in terms of statutory carers assessments, responsibility lies with the local authority where the cared for person lives.</p> <p>However, as noted, it may be easier and preferable for carers to access more informal support where they themselves live. We will ensure that the re-commissioning of the Carers Support Service takes this into account and is clear about providing support to carers who live in the City of London.</p>	<p>Commissioning Team</p>

You said (Carers)	We did (City Corporation)	Lead
What support is there for working carers in the City of London?	<p>In terms of carers who live in the City of London who are working, the recommissioned carers service will consider trialling whether there is a need for any sessions out of working hours.</p> <p>The City and Hackney Public Health Team run Business Healthy which is an initiative to support businesses in the City of London to promote and support the health and wellbeing of their workers. We have had discussions with the Team to suggest that the issue of caring could be an area that the initiative looks to explore and support.</p>	<p>Commissioning Manager</p> <p>City and Hackney Public Health Team</p>
Young carers must not be forgotten. What about support for young carers transitioning to becoming adult carers?	<p>We agree. Young carers are currently supported by the Early Help Team and responsibility for support shifts to Adult Social Care where applicable when they became 18.</p> <p>There have been few instances of this in recent years but the transitions pathway was reviewed to ensure it was robust and planning for transition starts early at the age of 14 as part of a Transitions Group.</p>	<p>Early Help Team</p> <p>Adult Social Care Team</p>

You said (Carers)	We did (City Corporation)	Lead
Short breaks and respite are crucial for carers' health and emotional wellbeing	<p>As noted in the strategy, respite for the cared for would be considered as part of a care package or as part of support for a child or young person with SEND.</p> <p>However, it is noted that carers also need specific support and breaks for themselves. Care free breaks are addressed in the recommissioning of the carers support service in terms of accessing various funds for carer breaks.</p>	Commissioning Manager
The health system is complex and hard to navigate, especially if English isn't your first language.	<p>This is an ongoing issue raised in relation to health services.</p> <p>We will continue to raise this as part of the health and social care integration work across North East London.</p>	Strategy and Performance Team
GPs should have a carer toolkit and need to approach carers from the point of view of being a carer. GPs have a code to record emergency plans and they're not providing the information to store in an emergency plan.	We will raise primary care support for carers in discussions with health colleagues at the City and Hackney partnership level and at the North East London level.	Strategy and Performance Team
What about a system to ensure that a carer's GP and their cared for's GP is the same? Could the GP offer the opportunity to both the carer and cared for to be seen by the same GP if they so wished? This would help the GP to see them as one unit and the impact circumstances may have on each other.	GP choice is a personal matter, but we can explore with health colleagues in the conversations noted above whether there are any measures that could be taken to strengthen the overall picture for GPs when talking to carers.	Strategy and Performance Team

You said (Carers)	We did (City Corporation)	Lead
You mention the Hospital Discharge Toolkit in the strategy. How can carers in the City of London benefit from that?	The Toolkit is for hospitals to explore carers experiences of hospital admission and discharge. In our conversations with health colleagues we will explore if there are any specific outcomes from this work and what the impact has been for carers.	Strategy and Performance Team
It is very hard for carers to access counselling and therapy pathways which can be so beneficial for emotional wellbeing.	The issue of emotional wellbeing has now been added to the strategy as a specific priority and any gaps which have been identified will be considered as part of the action plan.	Strategy and Performance Team

Table 3: Carers action plan

You said (Carers)	We did (City Corporation)	Lead
Be specific about when the action plan will be reviewed.	<p>The action plan will be formally reviewed annually. The Strategy and action plan are due to be signed off in December 2023 so it is planned that the review will be between October and December each year.</p> <p>However, there will be opportunities for carers to review and monitor the action plan throughout the year.</p>	Strategy and Performance team
Make sure the actions align with all the points in the strategy.	This has been checked and alignment is in place. We will continue to monitor this if things change as part of the review process.	Strategy and Performance team

You said (Carers)	We did (City Corporation)	Lead
The success measures need to be SMART (specific, measurable, achievable, realistic and timebound).	We reviewed this again and we will continue to keep under review as work evolves.	Strategy and Performance team
We don't want the priority around engagement with carers to be a long list of things for carers to do, carers have limited time and capacity.	We will continue to engage with carers to get a better understanding of what they would like to be involved in and how. We recognise that there are different levels of engagement and co-design that carers want to be involved in and we will be open and transparent about this.	Strategy and Performance team Commissioning Lead Adult Social Care

Table 4: Recommissioning of the carers support service

You said (Carers)	We did (City Corporation)	Lead
We want a standalone carers support service to continue and not be reintegrated back into a general support service.	We are commissioning a standalone carers support service.	Commissioning Manager
A standalone, carers service is crucial both for the quality of advice and for young carers (current pilot service liaises with City and Hackney Carers Centre for young carers and they are very knowledgeable). Examples shared of where advice from other partners is inaccurate.	We will commission a standalone service for carers. Commissioning Manager liaising with partners identified regarding incorrect advice given.	Commissioning Manager

You said (Carers)	We did (City Corporation)	Lead
There needs to be consistency in provision and service as the carers support service is recommissioned.	Agreed and recognised. We will endeavour to ensure as much consistency as possible.	Commissioning Manager
Relationships take a long time to build. We have developed a good relationship with the current project manager.	This is acknowledged and recognised.	Commissioning Manager
What about support for young carers transitioning to becoming adult carers?	See point in table 2 above.	
How will the carers support service link with City Connections? How will social prescribers know about carers support in the City?	We will include requirements within the specification (as with all contracts) to work with identified partners and agree referral routes where applicable.	Commissioning Manager
There is a need for practical help and support for both the carer and the cared for when carers are poorly.	This relates to points above about emergency cards and plans which is a key action in the strategy.	
We're finding it hard to get European toilet access keys posted since Brexit.	The City Corporation does not have any role in this.	Strategy and Performance Team
There should be a physical carers centre in the City of London.	Space for carers to meet is reflected in the recommissioning of the carers support service in terms of having 'pop-up' centres which provide more flexibility and innovation across a range of spaces. This should also reach a more diverse group of carers.	Commissioning Manager

We have listened to carers and the specification of new carer support service will have two levels:

- **Primary requirement** - this is the base service which is expected in the contract.
- **Preferred requirement** - this is the service which carers would like to be provided as part of the contract.

The list below details what will be included as a **primary requirement** in the recommissioning of the carer support service in response to what carers have told us. The Commissioning Manager will lead on this.

- The current carers support service (which is a pilot) depends on one person (the project manager) which is a risk. The new service should ensure that there is back-up staff when the project manager is on leave.
- There needs to be advocacy for carers at various levels; including Care Act advocacy and challenging partners and agencies (including the City Corporation).
- It is important to be able to network with other mental health support groups for carers.
- It is important that the carers support service has links to the Carers Trust. (We will also include links to other national and local carers groups and charities).
- Short breaks and respite are vital for carers. The carers support service should enable and facilitate care free breaks. This will continue support provided as part of the current pilot.
- The carers support service should help carers with paperwork to apply for grants; e.g. Carers Trust offer grants up to £300.
- Whoever is commissioned to deliver the carer support service must have access to up-to-date technology. (We will ask for more feedback from carers to determine the detail of this requirement).
- The current carers support project lead is 'excellent'. The research turnaround and advice is speedy, personalised and accurate.

The list below details what will be included as a **preferred requirement** in the recommissioning of the carer support service in response to what carers have told us. The Commissioning Manager will lead on this.

- The carers support service should be available outside of typical 9-5 work hours Monday to Friday and at weekends. It was noted that the informal City Carers Community provides an informal service outside of current office hours.
- Carers whose cared for reside outside of the City of London or who self-fund should be able to access the carers support service. Carers felt that currently support from the City Corporation ceases for these cohorts.
- There needs to be support for carers whose caring responsibilities have now ceased. Carers forum feedback suggested that six years is an ideal time period.
- The project manager should help carers to navigate health pathways and advocate with consultants and health professionals.
- Carers support service should help carers transition when their caring roles ceases. Peer support should be provided.

- There should be a carers toolkit given to carers by whoever has the first contact with a carer, e.g. carers service or adult social care.

There was feedback and ideas raised in discussions about the recommissioning of the carer support service that are more related to the City Corporation's **Adult Social Care** service. This has been fed back to the Head of Adult Social Care and shared to inform the development of the adult social care strategy in 2024. **You said:**

- There should more consistency in approach and information from the adult social care social workers.
- There should be better access to the City Corporation adult social care team and responses to queries. The names of two officers would greatly facilitate this and carers would know who they should make their initial contact with.
- There is a sense of 'trepidation' when faced with contacting formal services within the City of London Corporation.

We also recognise the following idea from carers which sits outside of the recommissioning of the carer support service:

- **You said** – there should be a listening service (including a mental health practitioner service, CRUSE Level 4 service).
- **We did** – the Commissioning Lead will explore what is currently available and whether such services could be available in the City of London.
- **You said** - There should be support for carers to visit their cared for who are resident outside of the City of London (e.g. taxicard and dial-a-ride issues recently identified).
- **We did** - The City of London Corporation would look to carers to use existing schemes available, but we will explore what the eligibility is for existing schemes to identify any specific gaps.

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Carers Strategy 2023 - 2027 Action Plan

Review : Annually

Priority 1: Tailored and universal services that work for carers

To deliver on this priority over the next four years, we will:

- Co-design the core offer to carers and improve the way organisations work together to provide more joined-up support for carers.
- Support carers to have a plan in place in the event of an emergency where they are unable to provide care.
- Ensure that carers in employment can access the support services they need.



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Action	What will this mean for carers?	Success measure	Lead
Recommission the Carers Support Service, reflecting carers' views and needs (including those in employment).	Carers recognise their input has been heard and receive support that meets their needs.	Service recommissioned in 2024.	Commissioning Manager
Explore introducing a carers emergency card and associated emergency plan.	Carers have a mechanism to know that should something happen to them, their cared for will be looked after.	Identify options by January 2024. Implementation by April 2024. Carers are taking up the offer and find it valuable.	Strategy and Performance Team Adult Social Care
Explore a discount card for carers in the City of London.	Carers get discounts on things that may help support them in their caring role.	Identify options by April 2024. Implementation by September 2024.	Commissioning Manager

		Carers are taking up the offer and find it valuable.	Strategy and Performance Team
Celebrate and recognise the contributions of carers through a range of events including carers rights day and carers week.	Carers feel valued and respected for their contributions.	Events agreed and delivered on an annual basis.	Carers support service

Priority 2: The health and emotional wellbeing of carers

To deliver on this priority over the next four years, we will:

- Ensure that carers residing in the City of London can access and benefit from health and emotional wellbeing services offered in the City of London and that may be linked to neighbouring boroughs.
- Explore how the gaps in service provision around carers' health and emotional wellbeing either can be met through targeted or universal support, particularly around key transition points.
- Improve carers' social connectivity so they feel part of their local community.

Action	What will this mean for carers?	Success measure	Lead
Collaborate with partners to secure access to services which are commissioned on a City and Hackney basis (or wider) but are available to City of London carers.	Access to a wider range of services that carers are entitled to.	More City carers accessing wider range of services by end of June 2024. Carers reporting increased emotional wellbeing.	Strategy and Performance Team
Discuss with partners and help facilitate provision of services within the Square Mile.	Services are more accessible to City of London carers.	City carers report services are more accessible.	Strategy and Performance Team

		Carers reporting increased emotional wellbeing.	
Identify what will be provided within the recommissioned carers support service as primary and preferred requirements.	The carers support service meets a range of identified needs and considers other needs it could meet.	The specification for the carers support service includes a wide range of primary requirements. Carers report satisfaction with the service after recommissioning and as part of contract monitoring.	Commissioning Manager
Explore how other identified gaps in services to carers could be met outside of the carers support service where appropriate.	Wider range of carer needs met.	Innovative approach to meeting needs identified. Range of funding opportunities utilised to resource these gaps. Uptake of any services or initiatives.	Strategy and Performance Team Commissioning Manager
Work in partnership to identify options to reduce social isolation amongst carers.	Carers feel connected to their communities and less socially isolated.	Options identified by June 2024. Implementation as appropriate by October 2024. Carers reporting less social isolation and more community connectedness.	Strategy and Performance Team
Work with health partners in the local place based partnership and the wider health and care	Health services are supporting carers in their role.	Health services are more proactive and responsive to the needs of carers.	Strategy and Performance Team

system to identify and implement actions that would improve carers' health and wellbeing.			
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Priority 3 : Early identification of carers

To deliver on this priority over the next four years, we will:

- Ensure a range of professionals are trained and supported to proactively identify and recognise carers.
- Ensure carers are supported by professionals to access the full range of information and services available.
- Support people to recognise when they are in a caring role and where to seek help.
- Identify where systems could work together more effectively so that carers do not have to keep telling their story to different services and only have to 'say it once'.

Action	What will this mean for carers?	Success measure	Lead
Develop and deliver training for a range of professionals that embeds recognition of carers.	More professionals can recognise and have appropriate conversations with carers.	Develop training model (based on Making Every Contact Count) by April 2024. Roll out training May-December 2024.	Strategy and Performance Team
Carer awareness added to induction sessions across the Department for Community and Children's Services and partner organisations.	More professionals can recognise and have appropriate conversations with carers and understand some of their experiences.	Carer awareness added to inductions session during 2024.	Strategy and Performance Team
Develop and deliver a programme of awareness raising activities so that people can	People will be supported to identify carers or self-identify as a carer.	Awareness raising activities delivered during 2024.	Strategy and Performance Team

Action	What will this mean for carers?	Success measure	Lead
<p>identify themselves and others as carers.</p> <p>Speak to carers about how they'd like to be involved.</p>		<p>More carers identified.</p>	<p>Adult Social Care</p> <p>Carers support service</p>
<p>Explore and establish mechanisms for better information sharing between GP Practices, community services and social care.</p>	<p>Carers should only have to tell their story once.</p> <p>Carers should be sign-posted to appropriate support and activities.</p>	<p>Mechanisms to improve information sharing identified by April 2024.</p> <p>Action taken to improve mechanisms by December 2024.</p>	<p>Strategy and Performance Team</p> <p>Adult Social Care</p>

Priority 4: Information and advice for carers

To deliver on this priority over the next four years, we will:

- Ensure that City Corporation information around carers is consistent, relevant, accurate, accessible and regularly updated.
- Support carers to acquire, develop and maintain digital skills to be able to access information and support.
- Provide information about what to do in a crisis so that carers feel confident that, should something happen to them, the person that they care for will be safe and looked after.

Action	What will this mean for carers?	Success measure	Lead
<p>Provide crisis information to anyone who is known as a carer.</p>	<p>Carers have information about what to do in a crisis (linked to carers emergency card).</p>	<p>Crisis information developed with input from carers and disseminated to network of carers.</p> <p>Carers tell us that they find the information useful.</p>	<p>Adult Social Care</p> <p>Carers support service</p>

Action	What will this mean for carers?	Success measure	Lead
Explore what digital and internet training is available in the City of London for carers.	The City Corporation will have a better understanding of current provision and gaps to inform what is available for carers.	Digital and internet training mapped, as well as any gaps in provision by April 2024.	Commissioning Manager
Make a range of digital and internet training accessible to carers based on need.	Carers can access training to improve their digital and internal skills. This should help carers search for and access information.	Carers attend training. Carers report feeling more digitally confident.	Commissioning Manager
Edit information and advice on the City Corporation website which is specific for carers including information for carers signposting them to relevant health resources e.g. charities for specific conditions.	Carers can access accurate information and be sign-posted to other sources of information.	Online platforms are updated by April 2024. Carers find the information useful.	Strategy and Performance Team

Priority 5: Engaging with carers

To deliver on this priority over the next four years, we will:

- Strengthen engagement and co-design with carers (as part of a wider programme around co-production across the Department for Community and Children’s Services).
- Extend our reach to engage with more carers in our community.
- Respect and value the expertise of carers.

Action	What will this mean for carers?	Success measure	Lead
Work with carers to agree their level of involvement in activities such as reviewing the carers strategy, the design and delivery of carer information and training for professionals.	Carers are aware of, and can chose to take part in, a range of engagement opportunities.	Carers feel their voice is heard in developing engagement activities.	Strategy and Performance Team
Build and expand the network of carers who want to be involved in engagement activities.	More carers have their voices heard.	More carers are involved in engagement activities.	Strategy and Performance Team Carers support service
Develop reward and recognition policy for different engagement levels and activities (wider piece of work).	Carers feel valued as experts by experience in their individual caring role.	Agreement for a reward and recognition policy by end of 2023. Development and implementation of reward and recognition policy by April 2024.	Strategy and Performance Team
Develop feedback mechanism for engagement activities, such as ‘you said, we did’ documents’, so	Carers see more transparency around decision-making and	Feedback mechanisms are included in project planning.	Strategy and Performance Team

Action	What will this mean for carers?	Success measure	Lead
that carers know their voices were heard and acted on, or where not acted on a reason is given.	where their input has had an impact.	Feedback mechanisms are delivered as part of each engagement project.	Commissioning Manager
Carers co-design the recommissioned carers support service.	<p>Carers see their input and needs reflected in the specification for the carers support service.</p> <p>Carers experience a service that meets their needs.</p>	<p>Carers co-design the specification for the carers support service by December 2023.</p> <p>Carers report feeling valued and heard.</p> <p>Carers support service commissioned early 2024.</p>	Commissioning Manager
Carers are involved in contract monitoring for the recommissioned carers support service.	Carers feel their voice is heard and influences the monitoring and delivery of the contract.	<p>Carers support service commissioned early 2024.</p> <p>Carers involved in and influence contract monitoring arrangements set up early 2024.</p>	Commissioning Manager

EQUALITY ANALYSIS (EA) TEMPLATE

Decision

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Date

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What is the Public Sector Equality Duty (PSED)?

The Public Sector Equality Duty (PSED) is set out in the Equality Act 2010 (s.149). This requires public authorities, in the exercise of their functions, to have 'due regard' to the need to:

- Eliminate discrimination, harassment and victimisation
- Advance equality of opportunity between people who share a protected characteristic and those who do not, and Foster good relations between people who share a protected characteristic and those who do not

The characteristics protected by the Equality Act 2010 are:

- Age
- Disability
- Gender reassignment
- Marriage and civil partnership
- Pregnancy and maternity
- Race
- Religion or belief
- Sex (gender)
- Sexual orientation

What is due regard?

- It involves considering the aims of the duty in a way that is proportionate to the issue at hand
- Ensuring real consideration is given to the aims and the impact of policies with rigour and with an open mind in such a way that it influences the final decision

The general equality duty does not specify how public authorities should analyse the effect of their business activities on different groups of people. However, case law has established that equality analysis is an important way public authorities can demonstrate that they are meeting the requirements.

Case law has established the following principles apply to the PSED:

- **Knowledge** – the need to be aware of the requirements of the Equality Duty with a conscious approach and state of mind.
- **Sufficient Information** – must be made available to the decision maker.
- **Timeliness** – the Duty must be complied with before and at the time that a particular policy is under consideration or decision is taken not after it has been taken.
- **Real consideration** – consideration must form an integral part of the decision-making process. It is not a matter of box-ticking; it must be exercised in substance, with rigour and with an open mind in such a way that it influences the final decision.
- **Sufficient information** – the decision maker must consider what information he or she has and what further information may be needed in order to give proper consideration to the Equality Duty.
- **No delegation** – public bodies are responsible for ensuring that any third parties which exercise functions on their behalf are capable of complying with the Equality Duty, are required to comply with it, and that they do so in practice. It is a duty that cannot be delegated.
- **Review** – the duty is not only applied when a policy is developed and decided upon, but also when it is implemented and reviewed.

- Due regard should be given before and during policy formation and when a decision is taken including cross cutting ones as the impact can be cumulative.

What is an Equality Analysis (EA)?

An equality analysis is a risk assessment tool that examines whether different groups of people are, or could be, disadvantaged by service provision and decisions made. It involves using quality information, and the results of any engagement or consultation with particular reference to the protected characteristics to understand the actual effect or the potential impact of policy and decision making decisions taken.

The equality analysis should be conducted at the outset of a project and should inform policy formulation/proposals. It cannot be left until the end of the process.

The purpose of the equality analysis process is to:

- Identify unintended consequences and mitigate against them as far as possible, and
- Actively consider ways to advance equality and foster good relations.

The objectives of the equality analysis are to:

- Identify opportunities for action to be taken to advance quality of opportunity in the widest sense;
- Try and anticipate the requirements of all service users potentially impacted;
- Find out whether or not proposals can or do have any negative impact on any particular group or community and to find ways to avoid or minimise them;
- Integrate equality diversity and inclusion considerations into the everyday business and enhance service planning;
- Improve the reputation of the City Corporation as an organisation that listens to all of its communities;

However, there is no requirement to:

- Produce an equality analysis or an equality impact assessment
- Indiscriminately collect diversity data where equalities issues are not significant
- Publish lengthy documents to show compliance
- Treat everyone the same. Rather, it requires public bodies to think about people's different needs and how these can be met
- Make service homogenous or to try to remove or ignore differences between people.

An equality analysis should indicate improvements in the way policy and services are formulated. Even modest changes that lead to service improvements are important. In it is not possible to mitigate against any identified negative impact, then clear justification should be provided for this.

By undertaking an equality analysis officers will be able to:

- Explore the potential impact of proposals before implementation and improve them by eliminating any adverse effects and increasing the positive effects for equality groups
- Contribute to community cohesion by identifying opportunities to foster good relations between different groups
- Target resource more effectively
- Identify direct or indirect discrimination in current policies and services and improve them by removing or reducing barriers to equality

- Encourage greater openness and public involvement.

How to demonstrate compliance

The Key point about demonstrating compliance with the duty are to:

- Collate sufficient evidence to determine whether changes being considered will have a potential impact on different groups.
- Ensure decision makers are aware of the analysis that has been undertaken and what conclusions have been reached on the possible implications.
- Keep adequate records of the full decision making process.

In addition to the protected groups, it may be relevant to consider the impact of a policy, decision or service on other disadvantaged groups that do not readily fall within the protected characteristics, such as children in care, people who are affected by socio-economic disadvantage or who experience significant exclusion or isolation because of poverty or income, education, locality, social class or poor health, ex-offenders, asylum seekers, people who are unemployed, homeless or on a low income.

Complying with the Equality Duty may involve treating some people better than others, as far as this is allowed by discrimination law. For example, it may involve making use of an exception or the positive action provisions in order to provide a service in a way which is appropriate for people who share a protected characteristic – such as providing computer training to older people to help them access information and services.

Taking account of disabled people's disabilities

The Equality Duty also explicitly recognises that disabled people's needs may be different from those of non-disabled people. Public bodies should therefore take account of disabled people's impairments when making decisions about policies or services. This might mean making reasonable adjustments or treating disabled people better than non-disabled people in order to meet their needs.

Deciding what needs to be assessed

The following questions can help determine relevance to equality:

- Does the policy affect service users, employees or the wider community, including City businesses?
- How many people are affected and how significant is the impact on them?
- Is it likely to affect people with particular protected characteristics differently?
- Is it a major policy, significantly affecting how functions are delivered?
- Will the policy have a significant impact on how other organisations operate in terms of equality?
- Does the policy relate to functions that engagement has identified as being important to people with particular protected characteristics?
- Does the policy relate to an area with known inequalities?
- Does the policy relate to any equality objectives that have been set?

Consider:

- How the aims of the policy relate to equality.
- Which aspects of the policy are most relevant to equality?
- Aims of the general equality duty and which protected characteristics the policy is most relevant to.

If it is not clear if a policy or decision needs to be assessed through an equality analysis, a Test of Relevance screening tool has been designed to assist officers in determining whether or not a policy or decision will benefit from a full equality analysis.

Completing the Test of Relevance screening also provides a formal record of decision making and reasoning. It should be noted that the PSED continues up to and after the final decision is taken and so any Test of Relevance and/or full Equality Analysis should be reviewed and evidenced again if there is a change in strategy or decision.

Role of the assessor

An assessor's role is to make sure that an appropriate analysis is undertaken. This can be achieved by making sure that the analysis is documented by focussing on identifying the real impact of the decision and set out any mitigation or improvements that can be delivered where necessary.

Who else is involved?

Chief Officers are responsible for overseeing the equality analysis proves within departments to ensure that equality analysis exercises are conducted according to the agreed format and to a consistent standard. Departmental equality representatives are key people to consult when undertaking an equality analysis.

Depending on the subject it may be helpful and easier to involve others. Input from another service area or from a related area might bring a fresh perspective and challenge aspects differently.

In addition, those working in the customer facing roles will have a particularly helpful perspective. Some proposals will be cross-departmental and need a joint approach to the equality analysis.

How to carry out an Equality Analysis (EA)

There are five stages to completing an Equality Analysis, which are outlined in detail in the Equality Analysis toolkit and flowchart:

2.1 Completing the information gathering and research stage – gather as much relevant equality-related information, data or research as possible in relation to the policy or proposal, including any engagement or consultation with those affected;

2.3 – Developing an action plan – set out the action you will take to improve the positive impact and / or the mitigation action needed to eliminate or reduce any adverse impact that you have identified;

2.4 Director approval and sign off of the equality analysis – include the findings from the EA in your report or add as an appendix including the action plan;

2.2 Analyse the evidence – make and assessment of the impact or effect on different equality groups;

2.5 Monitor and review – monitor the delivery of the action plan and ensure that changes arising from the assessment are implemented.

The Proposal

Assessor Name:	Zoe Dhami	Contact Details:	Zoe.dhami@cityoflondon.gov.uk
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1. What is the Proposal

The Carer Strategy 2023 – 27 will identify and support carers through the complexities of their caring journey and the impacts it can have on a carers own health and wellbeing.

2. What are the recommendations?

The strategy has five priorities:

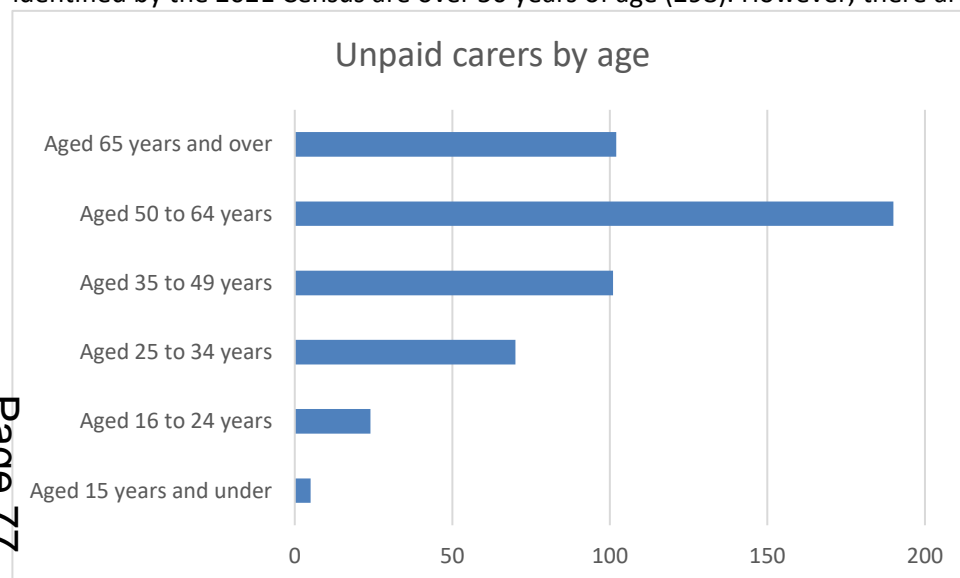
- Tailored and universal services that work for carers.
- The health and emotional wellbeing of carers.
- Early identification of carers.
- Information and advice for carers.
- Engaging with carers.

3. Who is affected by the Proposal? *Identify the main groups most likely to be directly or indirectly affected by the recommendations.*

A carer is someone who spends time looking after or helping a friend, family member or neighbour who, because of their health and care needs, would find it difficult to cope without this help. The strategy acknowledges carers regardless of their age or whether they self-identify as such. The carers group can be broken down into young carers, parent carers and adult carers. This delineation is due to different services that are currently on offer across these three groups and recognises the different needs of each.

Age - Additional Equalities Data (Service Level or Corporate) *Include data analysis of the impact of the proposals*

There are 496 self-identified carers in the Square Mile as of the 2021 Census. This is a decrease from the 576 in 2011 census (a decrease mirrored in other local authorities). Unpaid carers make up 5.8% of the City of London population. The majority of carers identified by the 2021 Census are over 50 years of age (298). However, there are 29 aged 24 and under.



What is the proposal's impact on the equalities aim? *Look for direct impact but also evidence of disproportionate impact i.e. where a decision affects a protected group more than the general population, including indirect impact*

Both young and older carers can face direct discrimination due to age. This includes:

- **Employment:** Young or elderly unpaid carers might be denied job opportunities or promotions due to assumptions about their caregiving responsibilities affecting their job performance.
- **Training Opportunities:** Employers or institutions may not offer training or skill development opportunities to younger or older unpaid carers, presuming they might not have the time or inclination.
- **Financial Assistance:** Some support programs or grants might have age-related criteria, excluding younger or older carers from receiving financial aid.

What actions can be taken to avoid or mitigate any negative impact or to better advance equality and foster good relations?

Coproduction will be a key element in the on-going provision of services to carers, and the Carer Strategy Implementation Group will be built on to include a diverse range of unpaid carer input. Through this elements of direct and indirect discrimination can be highlighted and designed out.

Training and awareness raising delivered at part of the action plan will take into account age.

The Carer Strategy work will be linked to the joint local health and wellbeing strategy action plan. This includes a focus on improving employment for residents in the City

- Access to Services: Younger carers, especially those below the age of 18, may find knowing about and accessing social care difficult. Either due to stigma around social care and the worry that someone may be removed from the family, or because it is not brought to the attention of the young carer. While older carers might not be directed to support specifically designed for elderly individuals.

Carers will also face indirect discrimination due to age. Including:

- Lack of Flexible Working Arrangements: Policies that don't allow for flexible working hours can disproportionately impact older carers who may have specific care routines to adhere to.
- Inadequate Support Services: Services designed without considering the unique needs of older carers might inadvertently exclude them. For instance, support groups or programs primarily targeted towards middle-aged carers might not address the concerns of other age groups.
- Public Awareness and Stereotyping: The prevalent image of a 'typical' carer might exclude the younger demographic, leading to a lack of recognition and understanding of their challenges.

Physical Accessibility: Older carers might face challenges accessing services or attending events if venues aren't elderly-friendly, such as lacking ramps or appropriate seating.

- Communication Barriers: Information might be primarily disseminated through channels more accessible to middle-aged individuals (like certain social media platforms), potentially excluding younger or older carers who may not use those channels as frequently.

Through outcome 1 of the carer strategy more will be done to ensure that all people, adult and children, are aware of what carer is and whether they are in a caring role. This proposal also includes raising awareness within primary care, secondary care, schools and other necessary points of daily contact of what a carer role is and how to identify carers. It is important to note that the identification of young carers is part of the carer strategy, however, ongoing support for young carers is covered by the early years strategy.

Through outcome 2 of the carer strategy all mediums of communication and access to information will be considered. This will include social media, postal mail outs, bulletin boards, email, flyers, pop-up sessions and video.

of London. One element will be the specific needs of carers that are in employment or those wanting to access employment.

A further component of the joint local health and wellbeing strategy is ensuring welfare services understand the specific needs of carers and can support them to access the advice they need.

Key borough statistics:

The City has proportionately more people aged between 25 and 69 living in the Square Mile than Greater London. Conversely there are fewer young people. Approximately 955 children and young people under the age of 18 years live in the City. This is 11.8% of the total population in the area. Summaries of the City of London [age profiles from the 2011 Census can be found on our website](#).

A number of demographics and projections for Demographics can be found on the [Greater London Authority website in the London DataStore](#). The site details statistics for the City of London and other London authorities at a ward level:

- [Population projections](#)

NB: These statistics provide general data for these protected characteristics. You need to ensure you have sufficient data about those affected by the proposal.

Disability - Additional Equalities Data (Service Level or Corporate) *Include data analysis of the impact of the proposals*

According to the 2021 Census there are 98 unpaid carers in the City of London with a disability under the equality act.

What is the proposal's impact on the equalities aim? *Look for direct impact but also evidence of disproportionate impact i.e. where a decision affects a protected group more than the general population, including indirect impact*

Direct discrimination faced by unpaid carers due to disability include:

- Employment: Unpaid carers with disabilities may be overlooked for jobs or promotions based on misconceptions about their ability to balance caregiving and work responsibilities.
- Training Opportunities: Employers or institutions might not provide training or skill development opportunities to disabled carers, making assumptions about their capabilities.
- Access to Services: Disabled carers might be denied access to certain carer services due to physical barriers or lack of disability-friendly amenities.
- Financial Assistance: Some support programs may have criteria that do not take into account the additional challenges faced by carers with disabilities, making them ineligible for certain benefits.
- Public Facilities: Disabled unpaid carers may face direct discrimination if public facilities are not accessible or equipped to cater to their needs.

Indirect discrimination faced by unpaid carers due to disability include:

- Lack of Accessible Information: Important information might be disseminated in formats not accessible to all disabled carers, such as lacking sign language interpretations, Braille, or easy-read formats.
- Inadequate Support Services: If support services are primarily designed without considering the unique needs of carers with disabilities, they might inadvertently fail to fully support this group.

What actions can be taken to avoid or mitigate any negative impact or to better advance equality and foster good relations?

Coproduction will be a key element in the on-going provision of services to carers, and the Carer Strategy Implementation Group will be built on to include a diverse range of unpaid carer input. Through this elements of direct and indirect discrimination can be highlighted and designed out.

Training and awareness raising delivered at part of the action plan will take into account disability.

The Carer Strategy work will be linked to the joint local health and wellbeing strategy action plan. This includes a focus on improving employment for residents in the City of London. One element will be the specific needs of carers that are in employment or those wanting to access employment. Included will be consideration of barriers to disabled carers.

A further component of the joint local health and wellbeing strategy is ensuring welfare services understand the specific needs of carers and can support them to access the advice they need. Disabled carers may be entitled to further support.

<ul style="list-style-type: none"> • Public Awareness and Stereotyping: Public perceptions and stereotypes about disabled individuals can lead to misunderstandings and underestimations of their capabilities as carers. • Communication Barriers: Carers with disabilities, like hearing or speech impairments, might face challenges in communicating their needs or the needs of those they care for, leading to inadequate support. • Physical Accessibility: Indirect discrimination can occur when events for carers or the locations of services are not accessible to those with physical disabilities. • Lack of Flexible Working Arrangements: While policies that lack flexibility can affect many unpaid carers, those with disabilities might find these policies particularly limiting, given the additional challenges they face. <p>Outcome 2 will need to consider how disabilities affect access to information.</p>	
<p>Key borough statistics:</p> <p>Day-to-day activities can be limited by disability or long term illness – In the City of London as a whole, 89% of the residents feel they have no limitations in their activities – this is higher than both in England and Wales (82%) and Greater London (86%). In the areas outside the main housing estates, around 95% of the residents responded that their activities were not limited. Additional information on Disability and Mobility data, London, can be found on the London Datastore.</p>	<p>The 2011 Census identified that for the City of London’s population:</p> <ul style="list-style-type: none"> • 4.4% (328) had a disability that limited their day-to-day activities a lot • 7.1% (520) had a disability that limited their day-to-day activities a little <p>Source: 2011 Census: Long-term health problem or disability, local authorities in England and Wales</p> <p>NB: These statistics provide general data for these protected characteristics. You need to ensure you have sufficient data about those affected by the proposal.</p>

Gender Reassignment

Check this box if NOT applicable

Gender Reassignment - Additional Equalities Data (Service Level or Corporate) *Include data analysis of the impact of the proposals*

92.07% of the City of London population that completed the Census 2021 stated their gender as being the same as their sex registered at birth.

0.11% reported sex being different to that registered at birth but did not specify identity

0.15% reported as a trans woman

0.06% reported as a trans man

0.15% reported as non-binary

0.01% reported as all other gender identities

Based on the percent of the population that identified as carers, there may be a low number of carers that fall into the 7.03% of residents identifying differently to the sex registered at birth.

What is the proposal's impact on the equalities aim? *Look for direct impact but also evidence of disproportionate impact i.e. where a decision affects a protected group more than the general population, including indirect impact*

Direct discrimination faced by unpaid carers due to gender reassignment include:

Employment: Carers who have undergone gender reassignment might be denied job opportunities or promotions based on prejudices related to their transition.

- Training Opportunities: Some employers or institutions might exclude carers who have undergone gender reassignment from training sessions due to biases.
- Access to Services: Carers who have undergone gender reassignment may face refusal or differential treatment when seeking support or services due to their trans status.
- Financial Assistance: Biases related to gender reassignment might influence the allocation of grants or financial support, leading to potential exclusion.
- Public Perception: Carers who have undergone gender reassignment might encounter derogatory comments, biases, or prejudiced behavior based on their transition.

Indirect discrimination faced by unpaid carers due to gender reassignment include:

- Lack of Inclusive Support: Services or support groups primarily designed for cisgender carers might not address the unique concerns of carers who have undergone gender reassignment.

What actions can be taken to avoid or mitigate any negative impact or to better advance equality and foster good relations?

Coproduction will be a key element in the on-going provision of services to carers, and the Carer Strategy Implementation Group will be built on to include a diverse range of unpaid carer input. Through this elements of direct and indirect discrimination can be highlighted and designed out. This will also include consideration as to whether support groups that are for carers that have had gender reassignment are necessary.

Further, there may be work with carers that can tailor communication to better suit carers that have gone through gender reassignment.

The carer strategy work will be linked to the joint local health and wellbeing strategy action plan. This includes a focus on improving employment for residents in the City of London. One element will be the specific needs of carers that are in employment or those wanting to access employment.

<ul style="list-style-type: none"> • Public Awareness and Stereotyping: Misunderstandings or stereotypes related to gender reassignment can lead to misconceptions about the roles and challenges of these carers. • Inadequate Representation: Carers who have undergone gender reassignment might feel underrepresented in carer advocacy groups, support organizations, or media portrayals. • Service Design: Services that are not tailored to address the unique challenges or experiences of carers who have undergone gender reassignment might inadvertently exclude or inadequately serve them. • Lack of Culturally Sensitive Care: The distinct experiences of transgender and gender-diverse individuals might not be considered when designing support or services for carers, leading to potential cultural insensitivity. • Assumptions about Medical Needs: There might be unwarranted assumptions about the medical or psychological needs of carers who have undergone gender reassignment, which can influence the type and quality of care or support they receive. 	
<p>Key borough statistics:</p> <ul style="list-style-type: none"> • Gender Identity update 2009 - ONS 	<p>NB: These statistics provide general data for these protected characteristics. You need to ensure you have sufficient data about those affected by the proposal.</p>

Pregnancy and Maternity

NOT applicable

Pregnancy and Maternity - Additional Equalities Data (Service Level or Corporate) *Include data analysis of the impact of the proposals*

Click or tap here to enter text.

What is the proposal's impact on the equalities aim? *Look for direct impact but also evidence of disproportionate impact i.e. where a decision affects a protected group more than the general population, including indirect impact*
Click or tap here to enter text.

Key borough statistics:

Under the theme of population, the [ONS website](#) has a large number of data collections grouped under:

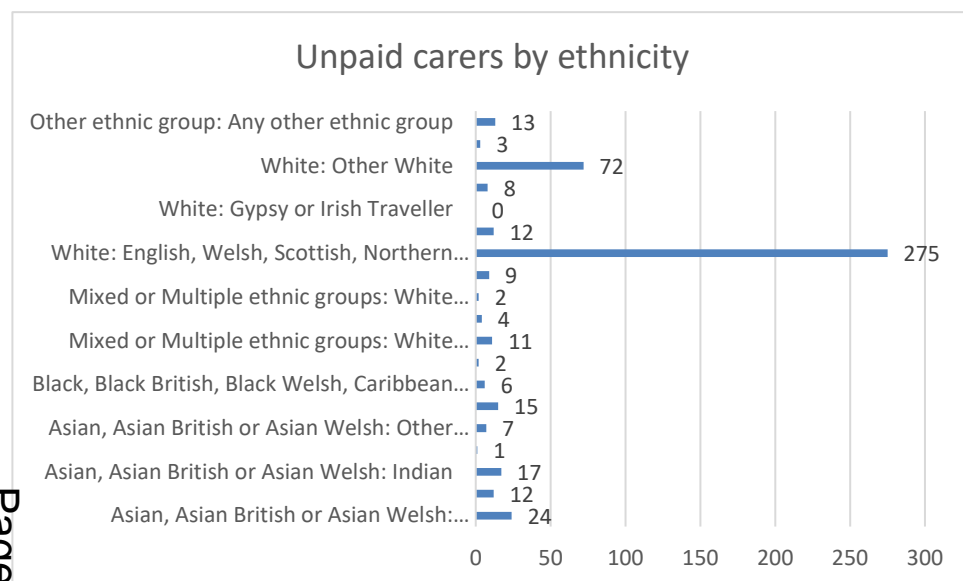
- [Contraception and Fertility Rates](#)
- [Live Births](#)

What actions can be taken to avoid or mitigate any negative impact or to better advance equality and foster good relations?

Click or tap here to enter text.

NB: These statistics provide general data for these protected characteristics. You need to ensure you have sufficient data about those affected by the proposal.

Race - Additional Equalities Data (Service Level or Corporate) *Include data analysis of the impact of the proposals*



The majority of carers are from all British white and white minority groups. However, 126 carers are from a ethnic minority background. The largest ethnic minority group is Bangladeshi, with 24 carers.

Ethnicity	Count
Asian, Asian British or Asian Welsh: Bangladeshi	24
Asian, Asian British or Asian Welsh: Chinese	12
Asian, Asian British or Asian Welsh: Indian	17
Asian, Asian British or Asian Welsh: Pakistani	1
Asian, Asian British or Asian Welsh: Other Asian	7
Black, Black British, Black Welsh, Caribbean or African: African	15
Black, Black British, Black Welsh, Caribbean or African: Caribbean	6
Black, Black British, Black Welsh, Caribbean or African: Other Black	2
Mixed or Multiple ethnic groups: White and Asian	11
Mixed or Multiple ethnic groups: White and Black African	4
Mixed or Multiple ethnic groups: White and Black Caribbean	2

Mixed or Multiple ethnic groups: Other Mixed or Multiple ethnic groups	9
White: English, Welsh, Scottish, Northern Irish or British	275
White: Irish	12
White: Gypsy or Irish Traveller	0
White: Roma	8
White: Other White	72
Other ethnic group: Arab	3
Other ethnic group: Any other ethnic group	13

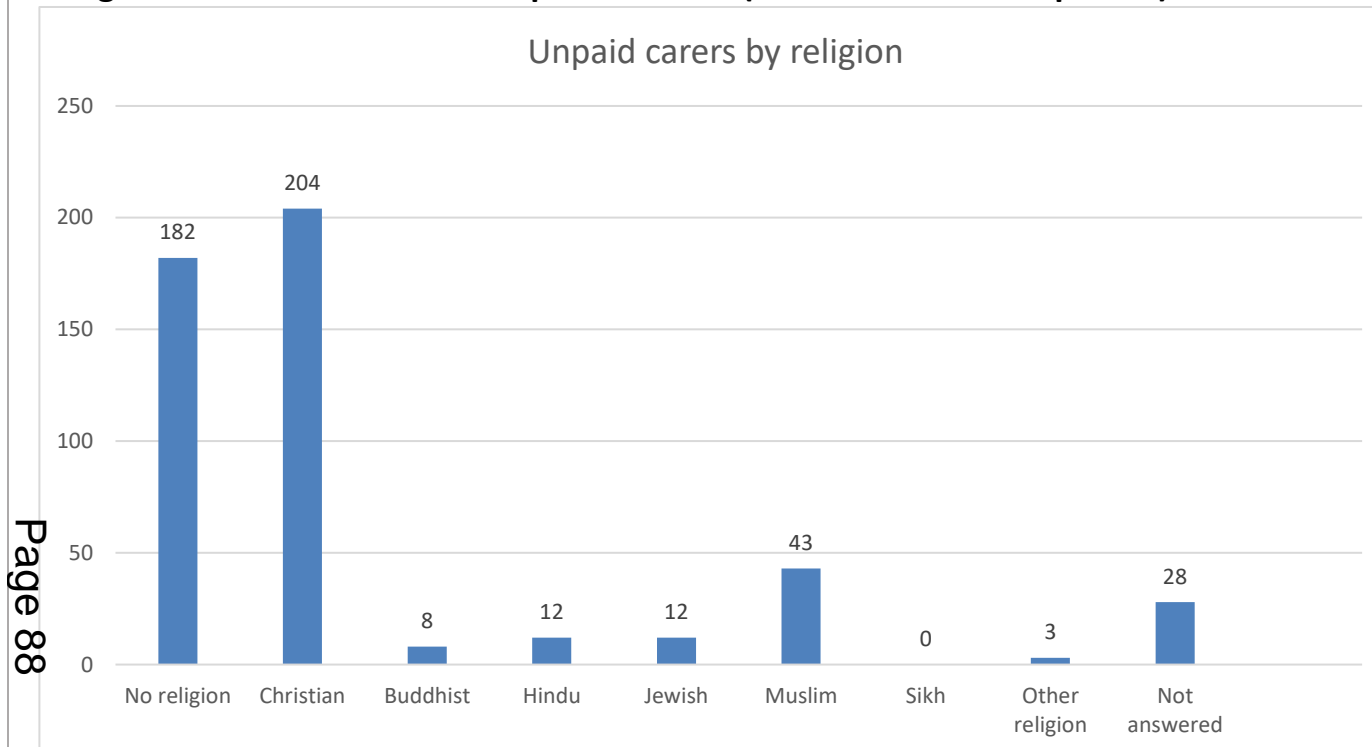
<p>What is the proposal’s impact on the equalities aim? <i>Look for direct impact but also evidence of disproportionate impact i.e. where a decision affects a protected group more than the general population, including indirect impact</i></p> <p>Direct discrimination faced by carers due to race include:</p> <ul style="list-style-type: none"> • Employment: Unpaid carers from racial and ethnic minorities might be denied job opportunities or promotions based on biases or stereotypes related to their racial background. • Training Opportunities: Employers or institutions may deny training or skill development opportunities to carers from certain racial or ethnic backgrounds based on prejudices. • Access to Services: Carers from racial and ethnic minority backgrounds may face refusal or differential treatment when seeking support or services due to their race. • Financial Assistance: Racial biases might influence the allocation of grants or financial support, leading to carers from certain backgrounds being unfairly overlooked. • Public Perception: Unpaid carers from minority racial backgrounds may face derogatory comments or prejudiced behaviour based on their race. <p>Indirect discrimination faced by carers due to race include:</p> <ul style="list-style-type: none"> • Cultural Insensitivity: Services designed without considering the diverse cultural needs and practices of carers from different racial backgrounds might inadvertently exclude or inadequately serve them. • Lack of Representation: Racial and ethnic minority carers might feel underrepresented in carer advocacy groups, support organizations, or in media 	<p>What actions can be taken to avoid or mitigate any negative impact or to better advance equality and foster good relations?</p> <p>Training and awareness raising delivered at part of the action plan will take into account race.</p> <p>This work will be incorporated into the wider employment workstream from the joint local health and wellbeing strategy, discussed above. (linked with outcome 3 of carer strategy).</p>
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<p>portrayals of carers.</p> <ul style="list-style-type: none"> • Language Barriers: Important information and support services may not be available in multiple languages, making it challenging for carers who speak languages other than English to access them. • Public Awareness and Stereotyping: Stereotypes associated with certain racial or ethnic groups can lead to misconceptions about their roles and challenges as carers. • Inadequate Networking Opportunities: Support groups or networking events might not be inclusive of or tailored to the unique experiences of carers from diverse racial backgrounds. • Cultural Stigmas: Certain racial or ethnic communities might have cultural stigmas associated with caregiving or seeking external support, indirectly placing additional pressures on carers. <p>Outcome 2 of the strategy includes a public campaign to help carers identify themselves in that role. Part of the work to develop this will be understanding the stigmas around caring for different roles in terms of getting help when it is expected of you, or the types of service support available. Included will also be what languages the campaign should be in and what community people may be best to share information with different ethnic groups.</p>	
<p>Key borough statistics:</p> <p>Our resident population is predominantly white. The largest minority ethnic groups of children and young people in the area are Asian/Bangladeshi and Mixed – Asian and White. The City has a relatively small Black population, less than London and England and Wales. Children and young people from minority ethnic groups account for 41.71% of all children living in the area, compared with 21.11% nationally. White British residents comprise 57.5% of the total population, followed by White-Other at 19%.</p>	<p>The second largest ethnic group in the resident population is Asian, which totals 12.7% - this group is fairly evenly divided between Asian/Indian at 2.9%; Asian/Bangladeshi at 3.1%; Asian/Chinese at 3.6% and Asian/Other at 2.9%. The City of London has the highest percentage of Chinese people of any local authority in London and the second highest in England and Wales. The City of London has a relatively small Black population comprising 2.6% of residents. This is considerably lower than the Greater London wide percentage of 13.3% and also smaller than the percentage for England and Wales of 3.3%.</p> <p>See ONS Census information or Greater London Authority projections.</p> <p>NB: These statistics provide general data for these protected characteristics. You need to ensure you have sufficient data about those affected by the proposal.</p>

Religion or Belief

Check this box if NOT applicable

Religion or Belief - Additional Equalities Data (Service Level or Corporate) *Include data analysis of the impact of the proposals*



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What is the proposal's impact on the equalities aim? *Look for direct impact but also evidence of disproportionate impact i.e. where a decision affects a protected group more than the general population, including indirect impact*

Direct discrimination faced by carers due to religious beliefs:

- Employment: Unpaid carers might be denied job opportunities or promotions based on prejudices related to their religious beliefs or practices.
- Training Opportunities: Some employers or institutions may exclude carers from training or development sessions due to biased perceptions related to their religion.
- Access to Services: Unpaid carers may face refusal or differential treatment in accessing carer services based on their religious affiliation.

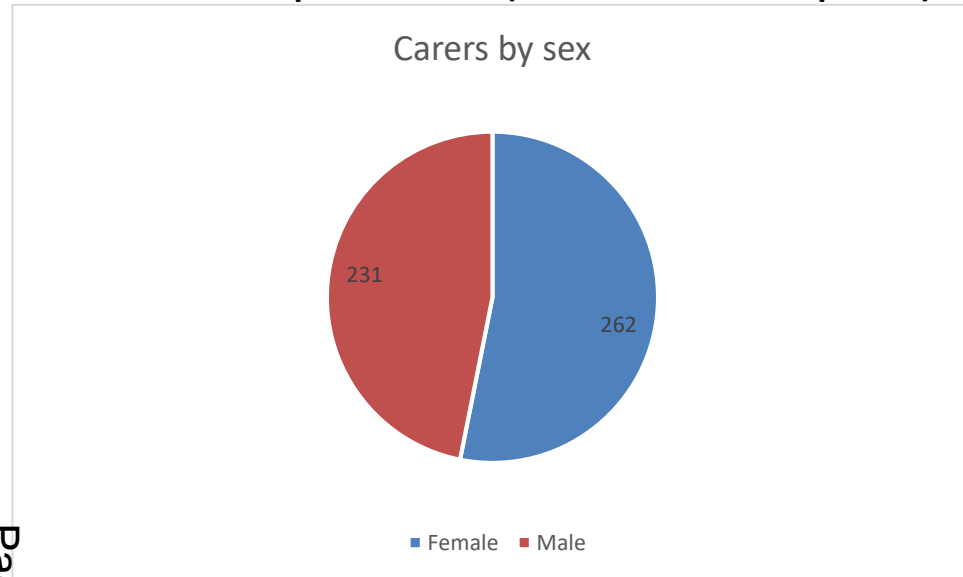
What actions can be taken to avoid or mitigate any negative impact or to better advance equality and foster good relations?

Given the wide range of religions and beliefs among carers coproduction will be central to ensuring services, peer groups and activities cater to all religious requirements and make all carers feel welcomed. (Linked to outcome 3).

Training and awareness raising delivered at part of the action plan will take into account race.

<p>• Public Interaction: Carers might encounter derogatory comments, biases, or prejudiced behaviour from the public or professionals based on their religious attire or practices.</p> <p>• Financial Assistance: Biases related to religion or beliefs may influence the allocation of grants or support to certain carers.</p> <p>Indirect discrimination faced by carers due to religious beliefs:</p> <ul style="list-style-type: none"> • Lack of Cultural and Religious Sensitivity: Services or support that do not consider the diverse religious practices and requirements may inadvertently exclude or inadequately serve carers of certain faiths. • Scheduling Conflicts: Training sessions, support group meetings, or events that are scheduled during religious observances or holidays can limit participation for carers of certain faiths. • Dietary Restrictions: Events or facilities that do not cater to the dietary restrictions of various religions can be excluding. • Public Awareness and Stereotyping: Misunderstandings or stereotypes related to certain religions can lead to misconceptions about the roles, challenges, or capabilities of carers from those religious backgrounds. <p>Lack of Representation: Carers from certain religious groups might feel underrepresented or misunderstood in advocacy groups or support organizations.</p> <ul style="list-style-type: none"> • Cultural Stigmas: Some religious communities might have internal stigmas or beliefs regarding caregiving, seeking external support, or discussing certain health conditions, indirectly placing additional pressures or challenges on carers. <p>The public campaign in outcome 2 to help residents identify as carers will take into consideration the stigma around support services or as accepting a carer role that may come from certain religions and beliefs. This will be done through coproducing the campaign with carers.</p>	
<p>Key borough statistics – sources include:</p> <p>The ONS website has a number of data collections on religion and belief, grouped under the theme of religion and identity.</p> <p>Religion in England and Wales provides a summary of the Census 2011 by ward level</p>	<p>NB: These statistics provide general data for these protected characteristics. You need to ensure you have sufficient data about those affected by the proposal.</p>

Sex - Additional Equalities Data (Service Level or Corporate) *Include data analysis of the impact of the proposals*



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What is the proposal's impact on the equalities aim? *Look for **direct impact** but also evidence of **disproportionate impact** i.e. where a decision affects a protected group more than the general population, including **indirect impact***

- Direct discrimination faced by carers due to sex include:
- **Employment:** Female carers, in particular, might be denied job opportunities or promotions due to societal perceptions about their primary role being caregivers.
 - **Training Opportunities:** Some employers or institutions might limit training or development opportunities for carers of a specific sex based on biases or stereotypes.
 - **Access to Services:** Carers of one sex might face refusal or differential treatment in accessing carer services based on preconceived notions related to gender roles.
 - **Financial Assistance:** Gender biases might influence the allocation of grants or financial support, with one sex being prioritised over the other.

What actions can be taken to avoid or mitigate any negative impact or to better advance equality and foster good relations?

Through the employment work of the joint local health and wellbeing strategy, significant consideration will be given to female workers and female carers will be included in this. There are direct and indirect discrimination that will greatly impact female carers that are either in work or are seeking employment. (Linked to outcome 3).

Training and awareness raising delivered at part of the action plan will take into account sex.

Coproduction will also ensure that support groups and activities are targeted at the right sex where it may be necessary to offer single sex support.

<ul style="list-style-type: none"> Public Perception: Male carers, for instance, might face comments or attitudes that challenge their role as caregivers, given societal expectations of caregiving as a "female" role. <p>Indirect discrimination faced by carers due to sex include:</p> <ul style="list-style-type: none"> Societal Expectations: Societal norms and expectations regarding gender roles can lead to undue pressure or lack of recognition for carers, especially for those who do not fit traditional caregiving moulds. Lack of Representation: Carers of a specific sex, particularly male carers, might feel underrepresented in advocacy groups, support organizations, or media portrayals. Assumptions about Capabilities: Stereotypes about what each gender is "naturally suited" for might lead to assumptions about the capabilities or limitations of carers based on their sex. Public Awareness and Stereotyping: Misconceptions about caregiving roles based on gender can result in reduced awareness or understanding of the challenges faced by carers of a specific sex. <p>Service Design: Services designed with a gender bias (e.g., mainly catering to female carers) might inadvertently exclude or inadequately serve carers of the other sex.</p> <ul style="list-style-type: none"> Support Group Dynamics: Some support groups might lean heavily towards one gender's experiences, potentially making it challenging for carers of the opposite sex to relate or benefit fully. 	
<p>Key borough statistics:</p> <p>At the time of the 2011 Census the usual resident population of the City of London could be broken up into:</p> <ul style="list-style-type: none"> 4,091 males (55.5%) 3,284 females (44.5%) 	<p>A number of demographics and projections for demographics can be found on the Greater London Authority website in the London DataStore. The site details statistics for the City of London and other London authorities at a ward level:</p> <ul style="list-style-type: none"> Population projections <p>NB: These statistics provide general data for these protected characteristics. You need to ensure you have sufficient data about those affected by the proposal.</p>

Sexual Orientation

Check this box if NOT applicable

Sexual Orientation - Additional Equalities Data (Service Level or Corporate) *Include data analysis of the impact of the proposals*

79.28% of City residents that undertook the census 2021 reported as heterosexual or straight.

7.58% reported as gay or lesbian

2.31% reported as bisexual

0.29% reported as pansexual

0.06% reported as asexual

0.10% reported as queer

0.01% reported as all other sexual orientations

10.37% did not answer.

Based on self-identified carers making up 5.8% of the population it can be estimated that a small number (around 50) may identify with a sexual orientation other than heterosexual or straight.

What is the proposal's impact on the equalities aim? *Look for **direct impact** but also evidence of **disproportionate impact** i.e. where a decision affects a protected group more than the general population, including **indirect impact***

Direct discrimination faced by carers due to sexual orientation include:

- Employment: Carers identifying as LGBTQ+ might be denied job opportunities or promotions based on biases related to their sexual orientation.
- Training Opportunities: Some employers or institutions might exclude carers based on their sexual orientation from training or development sessions.
- Access to Services: LGBTQ+ carers might face refusal or differential treatment when seeking support or services based on their sexual orientation.
- Financial Assistance: Biases related to sexual orientation might influence the allocation of grants or financial support to certain carers.
- Public Perception: Carers from the LGBTQ+ community might face derogatory comments, biases, or prejudiced behaviour based on their sexual orientation.

Indirect discrimination faced by carers due to sexual orientation include:

- Lack of Inclusive Support: Services or support groups primarily designed for heterosexual carers might not address the unique concerns of LGBTQ+ carers.

What actions can be taken to avoid or mitigate any negative impact or to better advance equality and foster good relations?

Coproduction will ensure that support groups and activities are available for carers that may want specific non heterosexual groups, and work will be undertaken to make them feel comfortable in all support groups. (Linked to outcome 3).

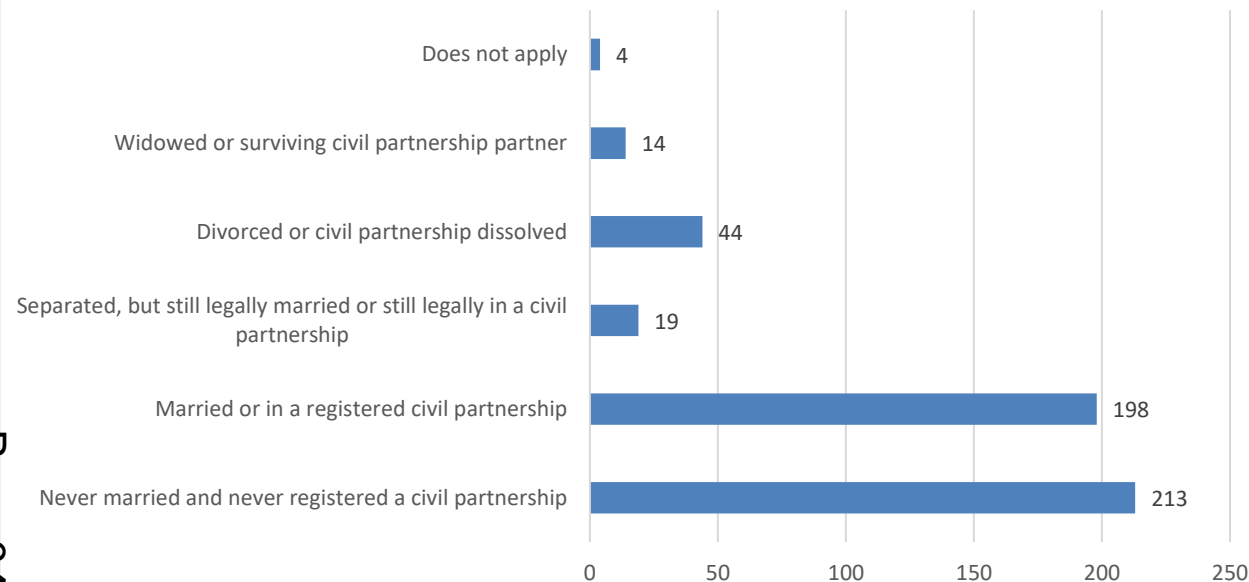
Training and awareness raising delivered at part of the action plan will take into account sex.

<ul style="list-style-type: none"> • Public Awareness and Stereotyping: Misunderstandings or stereotypes related to sexual orientation can lead to misconceptions about the roles and challenges of LGBTQ+ carers. • Inadequate Representation: LGBTQ+ carers might feel underrepresented in carer advocacy groups, support organizations, or media portrayals. • Assumptions about Family Dynamics: There might be assumptions about the familial relationships and dynamics of LGBTQ+ carers, leading to misinformed advice or support. • Service Design: Services not tailored to address the unique challenges or experiences of LGBTQ+ carers might inadvertently exclude or inadequately serve them. • Lack of Culturally Sensitive Care: The unique cultural or community-related experiences of LGBTQ+ individuals might not be considered when designing support or services for carers, potentially resulting in cultural insensitivity. <p>Outcome 2 of the strategy includes a public campaign to help carers identify themselves in that role. Part of the work to develop this will be understanding the stigmas around caring due to sexual orientation. This will also be extended to other actions in outcome 2 about ensuring relevant and needed information is accessible. Where applicable, links will be made with organisations that already have the expertise to support people facing different difficulties with caring.</p>	
<p>Key borough statistics:</p> <ul style="list-style-type: none"> • Sexual Identity in the UK – ONS 2014 • Measuring Sexual Identity - ONS 	<p>NB: These statistics provide general data for these protected characteristics. You need to ensure you have sufficient data about those affected by the proposal.</p>

Marriage and Civil Partnership - Additional Equalities Data (Service Level or Corporate) *Include data analysis of the impact of the proposals*

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Carers by marriage and civil partnership



What is the proposal's impact on the equalities aim? *Look for direct impact but also evidence of disproportionate impact i.e. where a decision affects a protected group more than the general population, including indirect impact*

Direct discrimination faced by carers that are married or in a civil partnership include:

- Employment: Carers in a marriage or civil partnership might be denied job opportunities or promotions based on assumptions about their caregiving responsibilities toward their spouse or partner.
- Training Opportunities: Employers or institutions might exclude carers in a marriage or civil partnership from training sessions, assuming they have other "family" commitments.
- Access to Services: Carers in a marriage or civil partnership might face

What actions can be taken to avoid or mitigate any negative impact or to better advance equality and foster good relations?

Training and awareness raising delivered at part of the action plan will take into account marriage and civil partnership.

differential treatment when seeking support or services based on their marital status.

- Financial Assistance: Certain grants or support programs might prioritise or deprioritise carers based on their marital status, leading to potential exclusion.
- Public Perception: Carers in a marriage or civil partnership might face comments or attitudes suggesting that their primary role should be to support their spouse or partner, regardless of other commitments.

Indirect discrimination faced by carers that are married or in a civil partnership include:

- Societal Expectations: Societal norms regarding the roles and responsibilities of those in a marriage or civil partnership might lead to undue pressure or lack of recognition for these carers.
- Lack of Recognition: The unique challenges faced by carers who are married or in a civil partnership, such as balancing caregiving duties for their spouse or partner with other responsibilities, might not be adequately recognised.
- Assumptions about Support: There might be assumptions that carers in a marriage or civil partnership receive more personal support, thereby reducing the perceived need for external assistance.

Public Awareness and Stereotyping: Stereotypes related to marital roles and responsibilities can result in reduced understanding or misconceptions about the challenges faced by carers in a marriage or civil partnership.

- Service Design: Services primarily designed without considering the unique challenges of those in a marriage or civil partnership might inadvertently exclude or inadequately serve them.

Outcome 2 of the strategy includes a public campaign to help carers identify themselves in that role. Part of the work to develop this will be understanding the stigmas around caring whether in a marriage, civil partnership or not. In all circumstances there will be differing stigmas that may need to be overcome (for example a spouse thinking caring is duty included in marriage) or acknowledgment that whatever partnership a carer is in, that their role requires the same support. This will be done working with carers.

Outcome 3 actions include ensuring support for people whose caring role has come to an end, through counselling, peer support or welfare aid.

Key borough statistics – sources include:

- [The 2011 Census contain data broken up by local authority on marital and civil partnership status](#)

NB: These statistics provide general data for these protected characteristics. You need to ensure you have sufficient data about those affected by the proposal.

Additional Impacts on Advancing Equality and Fostering Good Relations

NOT applicable

Additional Equalities Data (Service Level or Corporate)

Click or tap here to enter text.

Are there any additional benefits or risks of the proposals on advancing equality and fostering good relations not considered above?

Click or tap here to enter text.

What actions can be taken to avoid or mitigate any negative impact on advancing equality or fostering good relations not considered above? Provide details of how effective the mitigation will be and how it will be monitored.

Click or tap here to enter text.

This section seeks to identify what additional steps can be taken to promote these aims or to mitigate any adverse impact. Analysis should be based on the data you have collected above for the protected characteristics covered by these aims.

In addition to the sources of the information highlighted above – you may also want to consider using:

- Equality monitoring data in relation to take-up and satisfaction of the service
- Equality related employment data where relevant
- Generic or targeted consultation results or research that is available locally, London-wide or nationally
- Complaints and feedback from different groups.

Additional Impacts on Social Mobility

Check this box if NOT applicable

Additional Social Mobility Data (Service level or Corporate)

NONE

Are there any additional benefits or risks of the proposals on advancing Social Mobility?

The Carer Strategy 2023-27 will have added benefits to improving the social mobility of carers due to the following:

- There is a focus on early identification of carers and ensuring that carers get the support they need in a timely manner. This should mitigate financial loss from crisis situations.
- There is a focus on helping carers identify themselves which should again mitigate financial loss from crisis situations.
- The strategy is closely linked to the Joint Local Health and Wellbeing Strategy that is aimed at reducing the impact of economic determinants of health.

What actions can be taken to avoid or mitigate any negative impact on advancing Social Mobility not considered above?

Provide details of how effective the mitigation will be and how it will be monitored.

Click or tap here to enter text.

This section seeks to identify what additional steps can be taken to promote the aims or to mitigate any adverse impact on social mobility. This is a voluntary requirement (agreed as policy by the Corporation) and does not have the statutory obligation relating to protected characteristics contained in the Equalities Act 2010. Analysis should be based on the data you have available on social mobility and the access of all groups to employment and other opportunities. In addition to the sources of information highlighted above – you may also want to consider using:

- Social Mobility employment data
- Generic or targeted social mobility consultation results or research that is available locally, London-wide or nationally
- Information arising from the Social Mobility Strategy/Action Plan and the Corporation's annual submissions to the Social Mobility Ind

Conclusion and Reporting Guidance

<p>Set out your conclusions below using the EA of the protected characteristics and submit to your Director for approval.</p> <p>If you have identified any negative impacts, please attach your action plan to the EA which addresses any negative impacts identified when submitting for approval.</p> <p>If you have identified any positive impacts for any equality groups, please explain how these are in line with the equality aims.</p>	<p>Review your EA and action plan as necessary through the development and at the end of your proposal/project and beyond.</p> <p>Retain your EA as it may be requested by Members or as an FOI request. As a minimum, refer to any completed EA in background papers on reports, but also include any appropriate references to the EA in the body of the report or as an appendix.</p>
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This analysis has concluded that ...

The analysis has indicated that the Carers Strategy 2023-27 will have a positive impact on carers as this is the first strategy to have been developed with unpaid carers throughout the process through the Carer Strategy Implementation Group and collaborative work will be built on through the actions. This is further ossified by current work on collaboration, reward and recognition of volunteers being undertaken in the department.

The analysis has highlighted that professionals and other front line staff need to understand how protected characteristics can all add challenges and nuances to the carer role which need to be understood in order to provide the best support. The Carers Strategy will make specific reference to how the action plan will ensure that any negative impact is avoided or mitigated, and to better advance equality and foster good relations.

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Outcome of analysis – check the one that applies

Outcome 1

No change required where the assessment has not identified any potential for discrimination or adverse impact and all opportunities to advance equality have been taken.

Outcome 2

Adjustments to remove barriers identified by the assessment or to better advance equality. Are you satisfied that the proposed adjustment will remove the barriers identified.

Outcome 3

Continue despite having identified some potential adverse impacts or missed opportunities to advance equality. In this case, the justification should be included in the assessment and should be in line with the duty to have 'due regard'. For the most important relevant policies, compelling reasons will be needed. You should consider whether there are sufficient plans to reduce the negative impact and/or plans to monitor the actual impact.

Outcome 4

Stop and rethink when an assessment shows actual or potential unlawful discrimination.

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Signed off by Director:	<i>Click or tap here to enter text.</i>	Name:	<i>Click or tap here to enter text.</i>	Date	<i>Click or tap to enter a date.</i>
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Agenda Item 8

Committee: Safeguarding Sub Committee – For Information DCCS: Grand committee	Dated: 23/11/2023 13/12/2023
Subject: Care Leaver Compact	Public
Which outcomes in the City Corporation’s Corporate Plan does this proposal aim to impact directly?	3, 10
Does this proposal require extra revenue and/or capital spending?	N
If so, how much?	N/A
What is the source of Funding?	N/A
Has this Funding Source been agreed with the Chamberlain’s Department?	N/A
Report of: Judith Finlay, Executive Director of Community and Children’s Services	For Decision
Report authors: Rachel Talmage, Head of Children’s Social Care and Early Help, People Department, Department of Community and Children’s Services	

Summary

The Pan London Care Leavers Compact provides a framework for developing consistency, breadth and quality in the support offered to City of London (CoL) care leavers. The Compact was established in early 2022 to deliver a consistent and high-quality offer for care leavers across the capital (Appendix 1). A report was taken to the Safeguarding Sub-Committee in May 2023, to set out progress against the Compact.

This paper responds to the London Innovation and Improvement Alliance (LIIA) Pan London Care Leavers Compact Local Authority Commitments report sent to local authorities in October 2023, which seeks corporate sign-up to six commitments set out in the Compact (Appendix 2).

This report to Members shows CoL’s progress in these six areas. A draft Care Leaver Offer, which care leavers are currently being consulted on, shows our ambition to have a world-class offer for our children. This final version will be shared with Members following the completion and sign-off from our young people.

Recommendation

Safeguarding Sub-Committee Members are asked to:

- Note the progress made on the six commitments that all London local authorities have been invited to sign up to
- Approve recommending that the Community and Children’s Services Committee sign up to the six commitments set out in the Compact

Main Report

Background

1. It is a duty under the Children and Social Work Act 2017 that England's local authorities must publish information about the services offered for care leavers. Each London local authority therefore has a care leaver offer, but these are individual to each area and do not provide a consistent and shared offer for our care leavers. Care leavers do not always live in the local authority responsible for them, which poses further challenges with the variation in offers. It is also important that the offer to care leavers reaches beyond services provided by local authorities. Partners such as health, education and transport have important roles to play, as do the private and voluntary sectors.
2. The Pan London Care Leavers Compact provides a framework for developing consistency, breadth and quality in the support offered to London's care leavers. The Compact was established in early 2022 to deliver a consistent and high-quality offer for care leavers across the capital.
3. City of London Corporation Members have always demonstrated a commitment to supporting our care leaver population. Following a focused visit of our care leaving services in November 2018, Ofsted noted that:

“Care leavers in the City of London benefit from a strong service that ensures that they are very well supported. They receive effective help which enables most to achieve good outcomes. There is a determined and appropriately ambitious political and corporate focus to sustain and improve outcomes for care leavers.”
4. Furthermore, in 2020, during the full Inspection of Children's Social Care Services, Ofsted judged the experience and progress of children in care and care leavers to be “Outstanding” noting the following:
 - Children in care and care leavers are extremely well supported.
 - Commitment to ensuring that needs are met is demonstrated by senior leaders, councillors, health partners and children's social workers, resulting in an extremely good level of service.
 - Extremely strong involvement and interest from council members.
 - Particular sensitivity shown regarding cultural diversity.
 - Strong use of advocacy and independent visiting.
 - Good housing offer, with support and moving only when ready.
5. In 2023, Ofsted introduced a separate judgement on care leavers, in recognition of the unique set of presenting needs of this cohort of young people.
6. The Care Leaver Offer has been updated after listening to the views of our care leavers, the people who work with them, from national research,

and from reviewing other offers from local authorities that are also graded as 'outstanding'. The draft is currently subject to final consultation with our young people .

Current Position

7. The LIIA wrote to London Directors of Children's Services on 10 October 2023 to ask for formal commitment to the Care Leavers Compact and its six commitments, to be approved by 31 December 2023. It is anticipated that there will be a formal launch of the agreed Compact in early 2024.
8. London local authorities are asked to sign up to the following six commitments:
 - 1) *London Local Authorities offer a full council tax exemption for their Care Leavers (18-25) that live within the borough.*
 - 2) *London Local Authorities adopt the principle that no Care Leaver (18-25) should be found intentionally homeless.*
 - 3) *London Local Authorities adopt the principle that their Care Leavers up to the age of 25 are to be found as being in 'priority need' under homelessness legislation.*
 - 4) *London Local Authorities offer a rent deposit scheme for their Care Leavers (18-25) for whom private rented accommodation is assessed as a suitable option.*
 - 5) *London Local Authorities have a joint protocol between Housing and Children's Services for Care Leavers in line with good practice advice.*
 - 6) *London Local Authorities become signatories to the Care Leavers Covenant.*

The following paragraphs update Members on how the CoL is demonstrating its dedication to these six commitments:

9. Commitment 1: Council tax scheme for care leavers
 - a. We have a council tax scheme for care leavers.
 - b. Care leavers aged up to 25 who reside in the City are exempt at source; no care leaver supported by the CoL has to pay council tax up to age 25 years; and the corporation does not bill these young people.
 - c. We ensure that care leavers aged up to 25 who reside outside the City who are eligible to pay council tax have applied for any discounts from their local council; their council tax is paid direct from the corporation to their local authority.

- d. At present we do not offer council tax exemption at source for care leavers supported by other local authorities who live in the City. We are currently unaware of any care leavers residing within the CoL boundary. Any amendment to this offer would likely have minimal impact on the budget.
 - e. This report seeks formal approval to extend our offer to any care leaver residing in the City.
10. Commitment 2: Housing policy exempting care leavers from becoming intentionally homeless
- a. Our housing policy ensures that care leavers are offered accommodation or are supported to access private renting, and are not ever in a position to be found intentionally homeless.
 - b. No care leaver supported by the City has ever been found intentionally homeless.
 - c. Legal advice has confirmed that we are not able to use the language 'exempt our young people from being found intentionally homeless' under housing legislation. However, we are able to commit to ensuring that no care leaver under the age of 25 will be homeless, and that an alternative home will be provided if required. The commitment to no care leaver being homeless is therefore present.
11. Commitment 3: All care leavers up to the age of 25 are to be found as being in 'priority need' under homelessness legislation
- a. Our care leavers are at the top band (band f) for bidding for CoL accommodation.
12. Commitment 4: London local authorities offer a rent deposit scheme for their care leavers (aged 18–25 years) for whom private rented accommodation is assessed as a suitable option
- a. We have a rent deposit scheme for care leavers aged 18–25 years for whom private rented accommodation is assessed as a suitable option.

Two care leavers took up this option in 2022–23, as they did not want to take up permanent accommodation within the CoL estates.
13. Commitment 5: A joint protocol between Housing and Children's Services for care leavers
- a. There is a joint protocol between our two services, and the services sit in the same department. This protocol is in line with good practice advice, including tenancy support and banding. The protocol will be revised again in 2023–24, as set out in the Children's Social Care Service Development Plan.

- b. The Housing lead sits on the Child in Care and Care Leavers Strategic Development Group, and regular Housing and Social Care meetings are held.
- c. The Housing department has created a video for care leavers about realistic expectations of their new studio flats. The Housing team ensure that every care leaver has an allocated tenancy support officer. No care leaver has ever been evicted from their home.
- d. A programme of preparation for independent living (including housing and expectations) is in place for 2024 to support the 121 social work and 121 keywork sessions.
- e. As young people move into their permanent homes, Children's Social Care will fund extra keywork support for their first six months of tenancy.

14. Commitment 6: Signatory to the Care Leaver Covenant in terms of its role as a large employer

- a. The City of London Corporation is signed up to the Covenant, which is separate to, but connected with the Compact.¹
- b. The Covenant is a national improvement programme, following governmental commitment to care leavers. It aims to ensure that young adults leaving care:
 - are better prepared to live independently
 - have improved access to employment, education and training
 - experience stability in their lives
 - feel safe and secure
 - have improved access to health support
 - achieve financial stability.
- c. Examples of CoL's approach to ensure these aims include:
 - Exploring ring-fenced opportunities for care leavers within the local authority. Our ambition is to offer a world-class service to our care leavers. The next phase of our work is looking at how care leavers can be included in the 'family firm', with the Corporation prioritising these – our children, in respect of work and work readiness.

¹ [Home - Care Leaver Covenant \(mycovenant.org.uk\)](https://mycovenant.org.uk)

- Our ambition is to ensure that all children and young people are in employment or education. For example, we will invite those who are unable to work or study full time into the Guildhall or other CoL spaces to offer routine, higher-level exposure to work, with real learning opportunities such as apprenticeships. This is a joint project between Children’s Social Care, Participation, the Virtual School and Adult Education.
- The apprenticeship offers are circulated to social workers and young people.
- The first collaborative offer between Adult Education and the Virtual School took place in summer 2023, with intensive English for Speakers of Other Languages (ESOL) provision to strengthen one of the biggest barriers to work – confidence through clear spoken English.
- In October 2023, the Virtual School held an Oracy Day to improve spoken English and confidence. This was a joint project with the City of London Freeman’s School.
- A social value contracting approach that benefits care leavers (whether around education, training or employment or other areas).
- The City of London Corporation uses a social value approach, and this work was taken forward between central strategy, the Head of Social Care and Early Help and Education and Early Years in 2022. One example was the collaboration with Procurement and IT colleagues to distribute laptops to our children in care and care leavers.

Corporate & Strategic Implications

Corporate plan

15. Work supporting care leavers sits within a commitment to a flourishing society, ensuring equality of opportunity. We would like to see equal outcomes for our young people: being able to access well-paying jobs and receive a good quality education. Our ambition for care leavers is equivalent to our hopes for our own children.

Financial implications

16. Costs to meet these commitments are managed within local budgets. Some features of the Compact include central support and funding, for example, Transport for London are covering 50% of the costs for care leavers for annual bus passes from April 2024.

Resource implications

17. Resource needs are met within the Department's resource base. Wider corporate engagement, for example, the procuring of laptops, will see wider commitment and distribution of resources to support our ambitions.

Legal implications – none

Risk implications

18. Providing a full, creative, enrichment programme and ensuring that young people are provided with opportunity and courses that will stretch them offers an antidote to boredom and the risk of unhealthy behaviours on an individual basis. The CoL will be subject to an Ofsted inspection in this area. There is a risk that, should the impact of the offer not continue to innovate and grow, then the CoL would suffer reputational risk.

Equalities implications

19. As part of the Care Leaver Compact, several London and national local authorities have adopted care leaver status as a protected characteristic. The LIA Report on Local Authority Commitments notes the following:

Care Leavers and those who support them have advocated for some time that care experience should be recognised as a 'protected characteristic'. This gained further traction through the Independent Review of Children's Social Care. The Review discusses the stigma and discrimination that people experience as a result of being in care or care experienced and argues that it is similar in nature to other groups that have a legally protected characteristic under the Equality Act (2021). It recommends that care experience should be made a protected characteristic to give employers, public services etc greater authority to put in place programmes to promote better outcomes for care experienced people.

Despite the Review's position, Stable Homes Build on Love does not follow through with a related proposal. Various Local Authorities have therefore decided to adopt this position themselves, with Lambeth, Waltham Forest, Merton, Ealing, Hammersmith and Fulham and Sutton passing resolutions in short succession this year. The implications of such a position are still to be fully understood; whilst the position is not binding in law, it will likely make a difference to the development of new council policy (through EDI [Equality, Diversity & Inclusion] assessments) and of whole council approaches to support Care Leavers.

As this is such a recent area of development, around which we are still learning, we are not making a recommendation, but flagging it as a topic that features strongly in many LA's thinking about their care leaver support.

20. Legal advice is being sought to support CoL to adopt this position. A future report will be submitted to the Safeguarding Sub-Committee and the Community and Children's Services Committee.

Climate implications – none

Security implications – none

Conclusion

21. The Care Leaver Compact sets out a comprehensive ambitious offer for all CoL local authorities to sign up to. The CoL is well positioned in this regard, having adopted most of the provisions already and already working towards recognising care leavers as a protected characteristic. The ambition is to be a world-class service to care leavers. Signing up to the Compact formally strengthens our offer across each of the Compact's six commitment areas.

Appendices

- **Appendix 1:** Pan London Care Leavers Compact
- **Appendix 2:** Pan London Care Leavers Compact Local Authority Commitments Report

Rachel Talmage

Head of Children's Social Care and Early Help
People Department
Department of Community and Children's Services

T: 020 7332 3621

E: Rachel.Talmage@cityoflondon.gov.uk

The Pan London Care Leavers Compact





"It is important for care leavers to be involved in decision making and policy changing such as the compact because they are the ones who have first-hand experience of the challenges and difficulties faced by young people who have grown up in the care system. They are the voices with the lived experience who need to be heard. The Compact offers a space where we can work together and make this happen."

Pan London Children
in Care Council

Introduction

The Pan London Care Leavers Compact provides a framework for developing consistency, breadth and quality in the support offered to London's Care Leavers. The project is sponsored by Lambeth and the London Innovation and Improvement Alliance (LIIA), working to the Association of London Directors of Children's Services (ALDCS). It has secured £110,000 of Department of Education funding to support delivery. Key delivery partners include the London Children in Care Council, Partnership for Young London, and the GLA.

Care leavers are young people who have previously been children in the care of their Local Authority. Children come into local authority care for a variety of reasons but will often have experienced significant trauma, the breakdown of family relationships and a range of challenges and disadvantages. They are entitled to the nurture, support, and opportunities that parents provide for their children as they transition to adulthood.

Together, as corporate parents, partners, and society, we have a duty to ensure that children who have not been able to live with their parents receive this.

Whilst most care leavers are adults, understandings around the extended nature of adolescence have deepened. In particular, young adulthood is increasingly recognised as a critical developmental stage of life. This is reflected in the 2017 Children and Social Work Act which extends the support duty of local authorities towards those care leavers who request it until the age of 25 (previously until age 21). This project reflects that change by recognising care leavers as 18–25-year-olds who have been in the care of a local authority. There are an estimated 16,000 London Care Leavers fitting this definition.

Why is a Pan London Care Leavers Compact needed?

“The disadvantage faced by our care experienced community should be the civil rights issue of our time. Children in care are powerless, they are often invisible to society and face some of the greatest inequalities that exist in England today ...

... the ‘corporate parenting’ responsibility that applies to local authorities needs to be extended to all public bodies for children in care and care experienced adults, to reflect the shared responsibility they have to these children and adults.”

(Independent Review of Children’s Social Care, 2022, pg. 144/145)

The 2022 Care Review is not alone in making this case. It is mirrored by the comments of London’s Children in Care Council, those who work with care leavers, and multiple national research bodies. The need for a regional approach to care leaver support was raised in the 2020 Children’s Society report: [Towards a Pan London Offer](#), which highlights care leavers’ confusion about the support that is available to them, as well as inequalities according to where they live and where they were in care.

It is a duty under the Children and Social Work Act 2017 that England Local Authorities publish information about the services offered for care leavers. Each London borough therefore has a care leaver offer, but these are individual to each authority and do not provide a consistent and shared offer. Care leavers do not always live in the borough responsible for them which further complicates understanding of their entitlements and the practical means of accessing them. Reaching reciprocal agreements is extremely challenging, which means that few Boroughs will offer support to each other’s care leavers. Movement is a particular challenge in London, where the existence of 33 Local Authorities with complex population, housing, and funding

dynamics mean that care leavers often live outside of their responsible borough and/or move frequently. Across London in 2020, 53% of children in care were placed outside of their local authority (DfE 2020), a proportion that is likely to be similar amongst young people who have left care.

In addition to issues of equity and accessibility, ‘local offers’ are currently heavily weighted towards the support provided by local authorities. The offer to care leavers should reach beyond services provided by local authorities, with partners such as health, education, transport, and the private and voluntary sector having vital roles to play. The Care Review recommends we adopt the term ‘community parenting’ rather than the currently used ‘corporate parenting’. There are many intersecting public services, business and commissioning frameworks that could be utilised to build offers that span London boroughs. Working in this way will have the added benefit of developing new ways of working across leaving care services to strengthen our regional approach and establish a better infrastructure for collaboration.

What should a Pan-London Care Leavers Compact deliver?

The Compact is a series of individual agreements brought together under an umbrella. The agreements are not mutually dependent and are being delivered sequentially, as agreement is reached. The targets for agreement under the Compact are drawn from several areas, notably:

- ▶ Existing and emerging practice
- ▶ Co-Production with London’s Children in Care Council and other care leaver participation networks
- ▶ Research and policy documents
- ▶ Data and Insight
- ▶ Partnership and Collaboration

Greater Manchester Care Leavers Guarantee

Greater Manchester Combined Authority (GMCA) launched its Care Leavers Guarantee in 2019, with five key priority areas for Care Leavers to:

- ▶ Be better prepared and supported to live independently
- ▶ Have improved access to education, employment, and training
- ▶ Experience stability in their lives and feel safe and secure
- ▶ Receive improved access to health support
- ▶ Achieve financial stability

The priorities have resulted in several pledges across the 10 GMCA authorities and their partners. These include full, reciprocal, council tax exemption, free bus passes, free prescriptions, and a range of commitments around care leaver housing and education. The London Compact will look to adopt several of the GMCA pledges and is grateful for their generosity in sharing approaches and learning.

London's Children in Care Council and other participation networks

The London Children in Care Council (CICC), supported by Partnership for Young London (PYL), have led and informed every stage of the Compact's development. The CICC met with ALDCS in January 2022, securing ALDCS support for the project and discussing key areas to cover. These are reflected in the thematic areas of the Compact. We would particularly like to recognise the roles of the PYL apprentices, all of whom are care-experienced and who have provided essential leadership and advocacy. <https://www.partnershipforyounglondon.org.uk/cicc>

The six thematic groups (Houses)

These groups, known as 'Houses', are described more fully below and bring together specialist stakeholders in a particular field to identify areas to target and ensure their delivery. They look to target

areas that will most benefit care leavers, whilst also being pragmatic about what can be achieved across London's boroughs and their partners. Each group is co-chaired by a young person from the Children in Care Council.

Research and Policy Documents

The Compact has drawn on research and policy documents to identify areas for a common approach across London. [The Children's Society Report, Towards a London-Wide Care Offer](#) is a key influence, flagging inconsistencies in current offers and reciprocity issues for care leavers outside their home boroughs. The Independent Review of Children's Social Care (May/June 2022) was published after work on a London Care Leavers Compact had started, however its recommendations are strikingly similar. Its five 'missions' are focused on loving relationships, jobs and education, health, and ending care leaver homelessness, all of which fit logically within the Compact's thematic groups. The clarity of recommendations such as ending 'intentional homelessness' assessments, publishing Integrated Care Board plans for improving health outcomes and setting targets for job creation, have helped generate focus and momentum. We are maintaining contact with the DfE Care Review Implementation team to ensure the Compact remains linked to wider Care Leaver policy and practice development.

The Compact is not the limit of ambition for care leavers and concentrates on resources and access to services, rather than more complex questions of what good and impactful practice looks like. Where practice themes emerge, these are fed into networks such as the London Local Authority Network for Care Leavers, and the Catch-22 Regional Benchmarking Forum.

London's current offer

It is important that the Compact builds on existing areas of consensus and strong practice. Several mapping exercises have been undertaken to understand London's current 'local offers' and identify similarities, differences, and the approaches that are having an impact. We have benefitted from others work in this regard, for example a 2020

scoping of council tax exemption by the Children's Society. A survey undertaken by the Compact Working Group in early 2022 across a range of measures included the below findings. These are based on 28 local authorities who responded out of 33 asked.

Category	Question	Yes	No
Housing	Do care leavers have some form of council tax exemption? <i>N.B. There is a variance in types of exemption across local authorities.</i>	28 or 100%	0 or 0%
	Can care leavers be assessed as intentionally homeless?	20 or 71%	8 or 29%
Mentoring	Do care leavers have rent deposit / guarantee support?	17 or 61%	11 or 39%
	Do care leavers have an additional mentoring offer?	16 or 57%	12 or 43%
Health	Do you have a dedicated mental health / wellbeing offer for care leavers?	20 or 71%	8 or 29%
	Do you offer free or discounted access to leisure centres?	22 or 79%	6 or 21%
ETE	Do you have an LA apprenticeship offer for care leavers?	17 or 61%	11 or 39%
	Do you have dedicated skills/pre-employment programmes for care leavers?	19 or 68%	9 or 32%

We are currently undertaking further surveys for a more detailed breakdown of housing, education, training and employment, and mental health offers across London.

"Through the Compact, we are tackling collaboration with various sectors such as: Education, training, employment, housing, transport, standardised financial offer and health. By getting young care experienced people involved we are promoting mental health, encouraging voices who are not often heard, and contributing equally amongst the diversity of care leavers across London."

Pan London Children in Care Council

How will the Pan-London Care Leavers Compact be delivered?

Securing support and agreement across multiple areas requires a strong and wide-reaching partnership. A Care Leavers Trust Board has been brought together to oversee the work and reflect the 'community parenting' ethos of the work. This has the following representation:

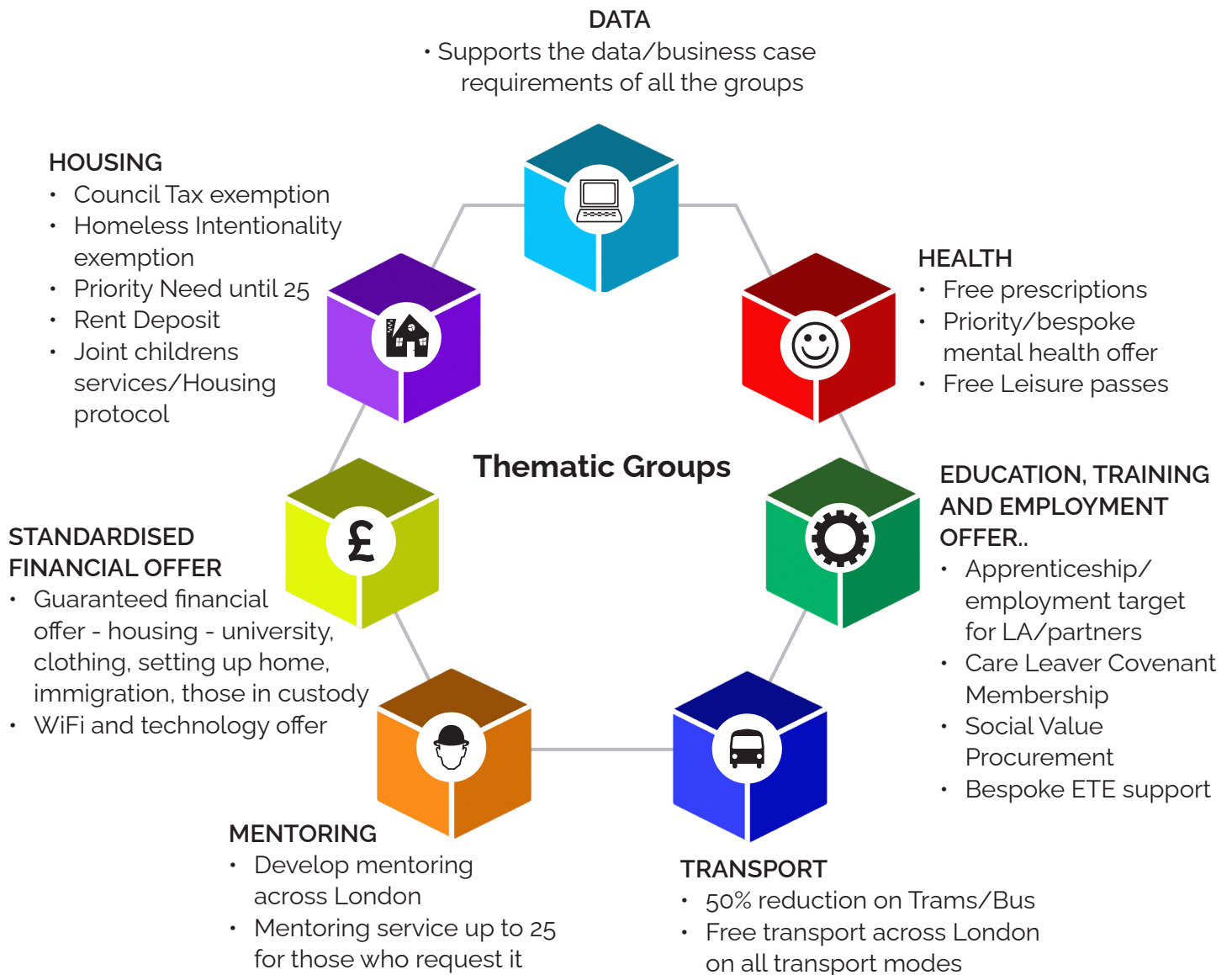
- ▶ A Director of Children's Services from each of London's Sub-Regions
- ▶ Young People from the London Children in Care Council
- ▶ Mark Riddell, the National Care Leaver Advisor
- ▶ Greater London Authority
- ▶ London Councils
- ▶ Care Leaver Covenant
- ▶ Catch-22 Regional Benchmarking Forum
- ▶ John Lewis
- ▶ NHS ICB Babies Children and Young People Lead

The Trust Board oversees the Compact Working Group, which consists of Lambeth, LiIA, and Partnership for Young London (including the Children in Care Council). London's existing Local Authority Network for Care Leavers (LLANCL), which brings together care leaving representation from the local authorities, is the reference group for delivery. Political support for the agreements will be critical and both young people and officers working on the project will look for engagement, advice, and support from Members, Chief Officers, City Hall, and national government.

Delivery of the project is organised into six thematic stakeholder groups, known as 'Houses', which bring together specialists in specific areas. Each group works to first identify and then deliver the support offers that come together to form the Compact. Whilst many targets for delivery are agreed, in some areas the detail of targets is still under consultation.



The 'Houses' - thematic areas for a Common Offer



“The care leavers compact is like a guide for all Local authorities and other partners across London to ensure professionals share resources and develop their skills, building best practice across London.”

Pan London Children in Care Council

How is the Compact progressing?

Each support offer is arrived at separately but will sit under the umbrella of a common offer to London's care leavers. The focus to date has been on the following areas.

Health

Free Prescriptions

Following advocacy by the Children in Care Council to the Regional Babies Children and Young People Transformation Board, London's Chief Nurse wrote to each of the ICS areas asking them to work with Local Authorities to implement a free prescriptions scheme for Care Leavers without an existing exemption. This will not only make access to essential medication affordable but have wider benefits in terms of prevention of more severe illness and supporting engagement with health services.

The South-West ICS area had already been working on a Free Prescription scheme and, along with the North-East ICS, are ready to launch their scheme before the end of 2022. London's other three ICS areas are all working on their schemes, which should follow promptly. An additional benefit has been bringing together the ICS areas for discussions on meeting care leaver needs.

Mental Health Provision

Almost without exception, care leavers will have experienced trauma and adverse childhood experiences. The impact on their mental health is significant; a 2017 report from Barnardo's, which mirrors earlier research, suggests that 46% of care leavers have been identified with a mental health concern, of which 65% were not receiving

a service. The Care Review stresses the need to meet care leaver mental health needs, including a recommendation for specialist, bespoke support to be delivered in partnership with Borough Leaving Care Services.

The Compact Working Group is currently mapping each local authorities' Mental Health Offer as a precursor to discussions on a London offer.

Education, Training and Employment

A series of successful events have been held with education providers and businesses to look at the offers to care leavers, pathways into provision, and how best to meet their support needs. These included a November 2022 workshop focused on the 'business offer' that was hosted by the West Ham United Foundation and John Lewis Partnership. The event was co-facilitated by the Children in Care Council and reached a broad range of businesses, one of whom made an immediate offer of 200 apprenticeships to London care leavers! The Compact will continue bringing together businesses, care leavers, and Personal Advisors to develop ETE offers and pathways. This also includes linking with statutory partners, for example the NHS England offer to develop 1,000 internship or early-stage career opportunities for care experienced young people over the next three years.

A survey is currently out to local authorities to map their 'family firm' offers to care leavers. This includes looking at apprenticeship, internship, and work experience offers across the Council, ETE support packages, and social value procurement policies. Local authorities are also being asked whether they are signatories to the Care Leavers Covenant, the DfE funded National Inclusion Programme. The Care Leavers Covenant does important work in supporting organisations across multiple sectors in their offers to care leavers, including tailored support to local authorities around developing Whole Council Approaches. 13 London Boroughs are currently signatories to the Whole Council Approach.

Housing

The Housing group has developed housing proposals that build on the work of Greater Manchester, the Care Review recommendations, and previous work undertaken by the Mayor of London and the Children's Society. Initial consultations have been undertaken with ALDCS and London's Housing Directors on the following proposals:

- ▶ Council Tax Exemption for Care Leavers
- ▶ Principles of avoiding 'intentional homelessness' assessments for Care Leavers and extending priority need to the age of 25
- ▶ Rent Deposit Schemes
- ▶ Joint housing protocols for Care Leavers between Housing and Children's Services in line with the Governmental best practice model

A survey is currently out to Local Authorities to map their positions against these proposals. Once the precise position is known, further engagement will take place with LA members and officers aiming to secure agreement.

Transport

The Mayor of London made a 2021 Manifesto commitment that Transport for London (TfL) would support London's care leavers with half-price travel. TfL have currently offered this on all bus and tram travel. This is a benefit that will be accessible to an estimated 16,000 18–25 year-old London care leavers. TfL are currently working with the London Datastore (GLA), the Compact Working Group and local authorities to devise an automated process for checking eligibility and administering the scheme. It is anticipated that the scheme will be available to care leavers by mid-2023.

Together for London's care leavers

A defining principle of the Pan London Care Leavers Compact is the 'community parenting' approach that brings partners together to deliver high quality and well-coordinated support offers. In a relatively short period, partners have come together across local authorities, Health, Education, Transport, Business, and Voluntary sectors to work on building these offers together in London. We anticipate that the number of stakeholders will continue to grow in 2023, offering the potential to move beyond the remit of the Compact and tackle the larger and more complex challenges facing care leavers.

We therefore use the final part of this briefing as a call to all parts of London to be a 'community parent'. Together, we will be better in the face of financial challenge and, through co-ordination of efforts, more than the sum of our parts. With London's Children in Care Council at the heart of delivery, all that we do will continually be tested against what is needed and what will work for the Care Leaving community. Together, we can ensure London's care leavers are not 'invisible to society', but rather that we are building the awareness and will to ensure care experienced young people have the opportunities and support that we would want for our own children.

To ask anything about this briefing or find out more about how to get involved please contact: matthew.raleigh@londoncouncils.gov.uk

"The Compact truly focuses on involving care leavers in decision making and policy changing can help to promote greater transparency and accountability in the care system. Care leavers can act as advocates for their peers and help to ensure that the care system is held accountable for its actions and decisions."

Pan London Children in Care Council

“A tree may grow in silence, but it does not stop the effects of nature. I am human my drive and need for change requires action which start words. How will they know? How will they know? How will they know what we really want if we remain silent? Do not respect fear, respect the power of the tongue embrace it and let it drive your change into success. We are the people who accept our past as part of us but do not let our past define us. Do you know how hard it is to see light when you've been buried in darkness? Do not respect fear respect the bravery of overcoming that fear, that silence and speaking up for what you truly believe in. We are using our stories to hopefully shorten the next child's journey to light. To make sure every child knows there will always be light after darkness.”

LIATeam@londoncouncils.gov.uk

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(In memory of the great contributions and challenges from the brilliant and much missed Aishat Hamzat)

Pan London Care Leavers Compact Local Authority Commitments



The London Children in Care Council and Directors of Children's Services meet Joanne McCartney, Deputy Mayor for Children and Young People, Sept '23

"The disadvantage faced by our care experienced community should be the civil rights issue of our time. Children in care are powerless, they are often invisible to society and face some of the greatest inequalities that exist in England today"

'A recent All Party Parliamentary Group report found that a third of care leavers became homeless in the first two years after leaving care (Miller, 2018), and research conducted by Centrepont found that 26% of care leavers had sofa surfed, while 14% were sleeping on the streets (Gill & Daw, 2017).'

(Independent Review of Children's Social Care, 2022)

Introduction

This paper asks London's Local Authorities to make six commitments to London's Care Leavers as part of a Pan London Care Leavers Compact. There are five housing related positions and an additional commitment relating to whole council support of Care Leavers through membership of the Care Leavers Covenant. The Compact aims to maximise consistency and quality in the 'local offers' of support to Care Leavers by Local Authorities and their partners. It is important to note that whilst this paper focusses on the Local Authority offer, we are concurrently developing partner offers, for example around free prescriptions with Health partners and transport with TFL. Please refer to the Care Leavers Compact briefing for a fuller description of this work and 'community parenting' principles of broadening the support offered to Care Leavers beyond Local Authorities.

<https://www.liia.london/wp-content/uploads/2023/04/The-Pan-London-Care-Leavers-Compact-Briefing-February-23-FINAL.pdf>

Background

Multiple sources reference the poor outcomes of children who leave the care of local authorities as opposed to those who live with their families. These young adults are required to live independently earlier than their peers, often at a distance from 'home', with less support and intersecting disadvantages.

There has been a common set of recommendations, made over several years, to improve outcomes for this cohort. In the context of Housing and Care Leavers, the 2015 Children's Society report, *The Wolf at the Door*, assesses the impact of Council Tax debt and recommended an exemption for Care Leavers. This was again recommended in their 2021 report, *Towards a London-Wide Care Offer*. Barnado's 2021 report, *No Place Like Home* is one of multiple voices to call for the removal of the 'unintentionality' requirement and the extension of 'priority need' for Care Leavers until the age of 25.

More recently, the government's Independent Review of Children's Social Care (March/April 2022), a key policy driver in children's social care, makes recommendations regarding housing and Care Leavers as follows:

"Recommendation 2: Introduce a stronger safety net against care leaver homelessness by removing the local area connection test, ending intentionally homelessness practice, providing a rent guarantor scheme and increasing the leaving care grant to £2,438 for care experienced people.

There will be no situation where any local authority discharges their corporate parenting responsibilities or housing duty to care leavers by deeming them intentionally homeless."

(Independent Care Review Recommendations Annexe, Chapter 6, pg. 133-142)

Recent legislative change is also relevant to Care Leavers and their housing. The 2017 Children and Social Work Act extends the support duty of local authorities towards Care Leavers who request it until the age of 25 (from 21 previously). This change reflects the extended nature of adolescence and the specific vulnerabilities and support needs of this cohort. It is also consistent with Local Authorities' responsibilities as corporate parents who are committed to providing 'what we would want for our own children'.

London Local Authority Commitments

The following commitments cover areas that have been identified as important by a variety of research bodies. The same areas have also been flagged by the London Children in Care Council and by Leaving Care and Housing Service Managers. Many authorities have already adopted these approaches, as shown by mapping of London offers and Greater Manchester's adoption of a common offer to Care Leavers. Whilst they can be hard to predict, for most LA's costs have not been a prohibitive factor. Further detail around the rationale and business case for each commitment is provided in Annexe A below and in the attached case studies/mapping.

1. **London Local Authorities offer a full council tax exemption for their Care Leavers (18-25) that live within the borough. (Note: We strongly encourage LA's to also fund the council tax of their Care Leavers living outside of the authority)**
2. **London Local Authorities adopt the principle that no Care Leaver (18-25) should be found intentionally homeless.**
3. **London Local Authorities adopt the principle that their Care Leavers up to the age of 25 are to be found as being in 'priority need' under homelessness legislation.**
4. **London Local Authorities offer a rent deposit scheme for their Care Leavers (18-25) for whom private rented accommodation is assessed as a suitable option.**
5. **London Local Authorities have a joint protocol between Housing and Children's Services for Care Leavers in line with good practice advice**
(<https://www.gov.uk/government/publications/joint-housing-protocols-for-care-leavers/joint-housing-protocols-for-care-leavers-good-practice-advice>)
6. **London Local Authorities become signatories to the Care Leavers Covenant**

A note on Care Experience as a Protected Characteristic

Care Leavers and those who support them have advocated for some time that care experience should be recognised as a 'protected characteristic'. This gained further traction through the Independent Review of Children's Social Care. The Review discusses the stigma and discrimination that people experience as a result of being in care or care experienced and argues that it is similar in nature to other groups that have a legally protected characteristic under the Equality Act (2021). It recommends that care experience should be made a protected characteristic to give employers, public services etc greater authority to put in place programmes to promote better outcomes for care experienced people.

Despite the Review's position, Stable Homes Build on Love does not follow through with a related proposal. Various Local Authorities have therefore decided to adopt this position themselves, with Lambeth, Waltham Forest, Merton, Ealing, Hammersmith and Fulham and Sutton passing resolutions in short succession this year. The implications of such a position are still to be fully understood; whilst the position is not binding in law, it will likely make a difference to the development of new council policy (through EDI assessments) and of whole council approaches to support Care Leavers.

As this is such a recent area of development, around which we are still learning, we are not making a recommendation, but flagging it as a topic that features strongly in many LA's thinking about their care leaver support.

Case Studies and London Mapping

Oldham is one of the 10 Greater Manchester Local Authorities who in 2019 adopted a common offer for their Care Leavers in several areas, including around Council Tax Exemption, Intentional Homelessness and Priority Need. This was enacted within a wider commitment to effective communication and joint working across children's and housing departments.

We attach the full Oldham cabinet paper and a shorter format version to explain why, along with the rest of Manchester, they decided to take this path. Key factors included the support of both Children's and Housing departments, an assessment that the cost implications were negligible, and the rationale that doing so was an important part of both the councils' homelessness and corporate parenting responsibilities.

We are also sharing summary case studies on the Kensington and Chelsea and London Borough of Barking and Dagenham council tax positions.

We are also sharing mapping, completed by leaving care services, on each London LA's current position against the commitments in this paper. As indicated, many authorities already adopt these practices.

Development and progression of the Commitments

We have undertaken a wide range of regional and national consultation in developing these commitments, including securing endorsement from ALDCS, Lead Members for Children and London's Housing Directors. This activity has included:

- Developing proposals with stakeholders and made the case for why there are important
- Undertaking mapping of each LA's position against the proposals
- Securing the endorsement of ALDCS for the proposals
- Engaging in a workshop for Lead Members for Children, who indicated their support and offered their assistance to progress them
- Undertaking two rounds of consultation with Housing Needs Managers and Housing Directors, following which London's Housing Directors formally endorsed these proposals in their meeting on 21st July 2023
- Providing a briefing summary to London Chief Executives

Next Steps and Requests of Local Authorities

Progression of these commitments relies on cross-cutting LA support. It is important that they are supported by the Local Authority as a whole, as well as by children's and housing departments. Having consulted on and agreed a Pan London position, we now ask that Local Authorities progress any proposals **that they have not already adopted**. Individual LA's routes for decision making may vary, but will likely to be through either corporate parenting boards or cabinet/full council. In order to assist Local Authorities, we provide the following 'pack':

- This paper, setting out the commitments
- Annexe A (below) explaining the rationale for each commitment
- Mapping spreadsheet showing the self-reported position of each borough against the proposals.
- Oldham '7 minute briefing' and cabinet paper regarding Intentional Homelessness and Priority Need
- Council tax exemption case studies from RBKC and LBBD
- Bexley Joint Housing/CS Protocol for Care Leavers

We are keen that these offers are put in place for London's Care Leavers as soon as possible (where they are not in place already). **We therefore ask that Local Authorities adopt these positions as their practice by December 31st 2023.** When combined with our partners' offers around health and transport, this will enable a first version of a Care Leavers Compact to be launched in February '24, marking London's commitment to a consistent, quality offer to its Care Leavers.

Louisa Foyle (Development Officer, Partnership for Young London)

Jacqui McShannon (DCS, LBHF and ALDCS strategic lead for Care Leaving)

Stephen Kitchman (DCS, Bexley and ALDCS strategic lead for Care Leaving)

James Thomas (DCS Tower Hamlets and ALDCS strategic lead for Care Leaving)

27.09.23

Annexe A - LA Commitments

- 1. London Local Authorities offer a full council tax exemption for their Care Leavers (18-25) that live within the borough. (Note: We strongly encourage LA's to also fund the council tax of their Care Leavers living outside of the authority)**

There are effectively three levels of council tax offer to Care Leavers within London. LA's who exempt **their** Care Leavers living within the borough through waiving revenue (90%). LA's who exempt **their** Care Leavers who are living within the borough and **pay** CT for their Care Leavers living outside the borough (60%). And a few LA's who exempt **any** Care Leaver living within their borough, whilst also paying CT for their Care Leavers outside the borough (10%). **It is important to note that only a small percentage of Care Leavers under the age of 25 pay council tax as those in supported accommodation, full-time higher or further education, or certain apprenticeships will not be liable.**

The best option for Care Leavers is for LA's to waive council tax for **all** Care Leavers living within their area. This would be a clear, consistent, and strong offer to Care Leavers and avoid complex arrangements around reciprocity. This is also the approach taken by the 10 Greater Manchester authorities. However, the nature of housing stock, cost and availability in London means that some boroughs have higher numbers of Care Leaver settlement than others. This is likely to make reaching agreement difficult in the short-term, although we are working through the National Care Leaver Advisor and London Councils to advocate a national approach.

It is proposed that, at a minimum, all London authorities offer a full council tax exemption to their 18-25 Care Leavers living within the borough. We also urge LA's to go further and fund the council tax of their Care Leavers living out of borough (as 60% of London boroughs currently do). We have attached two case studies from LA's with different demographics who have adopted this position – for Barking and Dagenham the 22/23 annual cost was £69,790.29 to support 79 Care Leavers, for Kensington and Chelsea £27,343 to support 12 Care Leavers. Most LA's are expected to fall within this range, however costs can only be predicted accurately at a local level as they depend on knowledge of Care Leaver numbers, personal circumstances, and the local housing position.

Our ambition remains higher than this – either full reciprocity or a change in the national tax position.

2. London Local Authorities adopt the principle that no Care Leaver (18-25) should be found intentionally homeless.

The duty to provide permanent accommodation does not arise where someone has been found to have become intentionally homeless. Intentional homelessness assessments can have a significant impact on an individual's current and future housing prospects. A variety of factors, including the impact of trauma, lower levels of support (relative to their peers), and living independently at an earlier age, mean Care Leavers are at higher risk than their age-equivalent peers of being found intentionally homeless. Many boroughs account for this and make efforts to avoid reaching this point – this 'upstream' support, particularly when co-ordinated across children's services and housing, is vital (see proposal 5). However, relatively few boroughs make the firm commitment, as advocated by the Care Review, that *"there will be no situation where any local authority discharges their corporate parenting responsibilities or housing duty to care leavers by deeming them intentionally homeless."*

This option does have some controversies – for example the duty to support would remain after an eviction due to antisocial behavior, or the refusal of an offer of suitable accommodation. We have also been advised by Housing Directors that housing legislation encourages decision-making based on individual circumstances rather than 'blanket' positions. However, the Council also has a duty to ensure these young people are allowed to learn from their mistakes and move on with its support (much as a family might respond to a child who has made a mistake). Balancing these factors, and accounting for feedback, we are proposing that London authorities adopt this as a 'principle' for Care Leavers until the age of 25. Any exemption to the principle should be agreed jointly between Housing and Children's services leads.

The intentional homelessness judgement is rarely applied in practice to Care Leavers. Care Leaving teams reported 10 such judgements across London over the last two years. At this level, any cost implication seems negligible to non-existent, particularly as boroughs will normally continue to support a Care Leaver after such as judgement. Adopting this position is therefore a statement of values and intent as much as a request for different practice.

3. London Local Authorities adopt the principle that their Care Leavers up to the age of 25 are to be found as being in 'priority need' under homelessness legislation.

Closely linked to the 'intentional homelessness' proposal is the proposal that Care Leavers up to the age of 25 should be considered in 'priority need' under homelessness legislation. The 2017 extension to the Local Authority support duty to Care Leavers to the age of 25 has not been accompanied by a similar change in housing legislation. Priority Need is therefore

a discretionary assessment for Care Leavers above the age of 21, who must be considered 'vulnerable' to receive it.

60% of London Local Authorities report that they currently adopt this principle. We struggled to get data from LA teams around the numbers of 21-24 yr old care leavers assessed as not being in priority need, but (as with IH) the belief is this is a rare occurrence. As with IH, it is therefore proposed that all London boroughs adopt this position as a 'principle'.

4. London Local Authorities offer a rent deposit scheme for their Care Leavers (18-25) for whom private rented accommodation is assessed as a suitable option.

With 61% of Local Authorities currently offering this and others stating they are developing a policy, there seems a degree of consensus that this is an important area of support for Care Leavers. London's relatively low level of social housing stock means that private renting is an important option for Care Leavers who are ready to live independently. Without the support of family, they will normally lack the financial resource to take the first step. Whilst some boroughs go further than this and offer (or are developing) a Rent Guarantee scheme, uncertainties around cost and duration of this commitment mean we are unlikely to achieve consensus around it.

5. London Local Authorities have a joint protocol between Housing and Children's Services for Care Leavers in line with good practice advice
[\(<https://www.gov.uk/government/publications/joint-housing-protocols-for-care-leavers/joint-housing-protocols-for-care-leavers-good-practice-advice>\)](https://www.gov.uk/government/publications/joint-housing-protocols-for-care-leavers/joint-housing-protocols-for-care-leavers-good-practice-advice)

66% of London boroughs have a joint protocol in place for Care Leavers. The Department for Education issues recommendations for the contents of such protocols and there are numerous good practice examples across London. The protocol is particularly important because it defines the vision and joint work arrangements that apply at all levels of Care Leaver housing need, from progression to independence to those at risk of housing breakdown or homelessness. The quality of the joint approach between Children's and Housing departments is vital to improving Care Leavers housing outcomes; **this is the proposal that is likely to have the greatest impact on the largest numbers of Care Leavers.**

We attach Bexley's joint protocol, which has been flagged as an example of good practice. Bexley recently received an 'outstanding' judgement in their Ofsted ILACS, which included an 'outstanding' judgement in the recently introduced stand-alone judgement on the experience and progress of Care Leavers.

6. London Local Authorities become signatories to the Care Leavers Covenant

The Care Leaver Covenant is the National Inclusion Body (DfE funded) for Care Leavers. They provide two main roles; hosting a wide range of local and national support offers for Care Leavers and providing support/guidance to organisations (including Local Authorities) who wish to support Care Leavers. This latter includes the development of Whole Council Approaches and Social Value Procurement strategies within Local Authorities. The Care Leaver Covenant is regularly referenced within Stable Homes, Built on Love, the government's response to the Independent Review of Children's Social Care, and is due to receive further funding to develop its offer.

13 London Local Authorities are currently signatories to the Care Leaver Covenant. There is no cost associated with becoming a signatory and in our engagement activity we have not heard any arguments against membership. A joint SOLACE / Care Leaver Covenant briefing on the Covenant and Whole Councils Approaches can be found here:

<https://mycovenant.org.uk/wp-content/uploads/2020/05/Briefing-paper-local-auth-final-Solace-Typeset-Printed-v5.pdf>



Appendix 1

Safe Havens

Safe Havens are a practical way for businesses to let people know that a form of support is easily available if they need help. Premises such as shops, cafes, pubs, libraries, and other places of interest can register to be officially known as a Safe Haven.

The definition of a Safe Haven is –

"A place of temporary refuge for a person to facilitate their onward journey. Whilst the Safe Haven cannot provide specialist interventions, staff can contact emergency services and/or signpost to specialist services where needed".

We are looking for businesses that are willing to be a Safe Haven to help women with their onward journeys – for example, providing a friendly face and reassurance, allowing the individual to charge their phone, calling a taxi, contacting family/friends, waiting for, or signposting to transport, and if required, making a phone call to the emergency services, or offering useful helpline numbers to the affected person.

Safe Havens will not intervene in someone's problems directly or speak to another person involved.

The basic criteria for a Safe Haven would include access to water (could be bottled), electricity, wi-fi or a landline telephone, charging point for mobile phone with extension lead if required, a chair/seat, access to a toilet if required, the Safe Haven Logo displayed in a window/door, trained staff with a list of support network contact details and relevant public liability insurance. Either Body Cameras are to be worn, or staff to have DBS checks completed, or two members of staff must be present when an individual is in the Safe Haven, or alternatively, the Safe Haven area must be covered by working CCTV.

Training to staff will enable the venue employees to feel confident in dealing with members of the public, bearing in mind that we cannot provide specialist support. Each venue will appoint a `champion` who will feed directly into us, and we will collate and evaluate all feedback received.

Safe Havens will be signposted/recognisable by using door/window stickers at each venue. Your business would be included as a delivery partner in communications and will also be included in any digital communications for the public to identify the location of the Safe Havens.

We will ensure that other partners, including the City Of London Police and The Metropolitan Police Service know about the Safe Haven and support it during their operational hours. We need your support to be able to deliver Safe Havens across London to help tackle violence against women and girls in public spaces.

Safe Haven Training

Safer Business Network has developed a grassroots training program which aims to improve the skills, knowledge, and confidence of learners in identifying vulnerability and making appropriate interventions to support the delivery of a Safe Haven. This will equip the participants with the skills to deliver the training to future Safe Haven staff and Champions.

Learning Objectives

During the session, learners will:

- Learn what a Safe Haven is and what it does.
- Learn the basic requirements of a Safe Haven.
- Explore the factors that put someone at risk.
- Discover how to assist `users` of Safe Havens.
- Develop skills which enable you to train other people and answer questions.

For further information:

Please speak to your BCRP Manager or email Eren.Bessim@Saferbusiness.org.uk our Training and Development Manager.

Committees: General Purposes Committee of Aldermen – For decision Community and Children’s Services Committee – For decision Resource Allocation Sub (Policy and Resources) Committee – For decision	Dated: 05/12/2023 13/12/2023 24/01/2024
Subject: Safe Havens in the City of London	Public
Which outcomes in the City Corporation’s Corporate Plan does this proposal aim to impact directly?	Outcome 1
Does this proposal require extra revenue and/or capital spending?	No
If so, how much?	
What is the source of Funding?	
Has this Funding Source been agreed with the Chamberlain’s Department?	
Report of: Judith Finlay, Executive Director of Community and Children’s Services	For Decision
Report author: Valeria Cadena, Community Safety Manager	

Summary

The purpose of this report is to ask for Members’ support for the delivery of Safe Havens across the City of London Corporation buildings and estates. The aim is to help tackle and prevent violence against women and girls in public spaces and make the Square Mile a safer place to live, work, study and visit.

Recommendations

Members are asked to:

- Note the report
- Endorse the Safe Haven scheme.

Main Report

Background

1. The Safer City Partnership is working with the Safer Business Network to help us create ‘Safe Havens’ for women and girls in the Square Mile. Safe Havens will assist women and girls who are feeling unsafe, harassed or in a vulnerable situation to continue their journey by helping them to contact emergency services, provide water, toilets or other basic facilities, or by offering useful helpline numbers to the affected person.
2. Safe Havens are defined as: "a place of temporary refuge for a person to facilitate their onward journey. Whilst the Safe Haven cannot provide specialist

interventions, staff can contact emergency services and/or signpost to specialist services where needed” (Appendix 1).

3. Safe Havens will not intervene in someone’s problems directly or speak to another person involved. Reception and security staff would receive training on how to deal with these situations so the Safe Haven can provide an immediate place of safety for women and girls at risk or in a vulnerable situation.
4. The basic criteria for a Safe Haven would include access to water, electricity, wi-fi or a landline telephone, charging point for mobile phone, a chair/seat, access to a toilet, trained staff with a list of support network contact details and relevant public liability insurance. Ideally the Safe Haven area must be covered by working CCTV. The accreditation will come with the Safe Haven Logo to be displayed in a window/door (Appendix 1).

Current Position

5. Our City of London buildings (Guildhall, Mansion House, Central Criminal Court, Bastion House and libraries) already have most of the requirements and we would like them to become accredited in the Square Mile to set up an example to all businesses.
6. There are no costs for the training as the Safer City Partnership has already provided funding for this initiative in the Square Mile. The training given to reception and security staff is in-person, takes around one hour, and will be free of charge to all City of London Corporation buildings.
7. The training will enable the venue employees to feel confident in dealing with members of the public, bearing in mind that they cannot provide specialist support. Each venue will appoint a ‘champion’ who will report directly to the Safer Business Network, and they will collate and evaluate all feedback received. The training provided by Safer Business Network aims to improve learners’ skills, knowledge, and confidence in identifying vulnerability and making appropriate interventions to support the delivery of a Safe Haven. Upon completion of the training, participants should be able to train future Safe Haven staff and champions.
8. Once we are part of the scheme, we would be included as a delivery partner in communications. We will also be included in any London digital communications for the public to identify the location of the Safe Havens. The City of London Police and the Metropolitan Police Service will know about the location of the Safe Havens and will provide support during their operational hours.
9. Southwark and Lambeth have joined forces to bring the same accreditation to their boroughs, to promote safety for women and girls.

Options

10. There are three options that can be taken:
 - Not to support.

- To support (Recommended). The Guildhall, Mansion House, Central Criminal Court, Bastion House and Libraries, already have most of what is required to become Safe Havens, and therefore the one-hour training can be rolled out to start the accreditation.
- In 2024, we can provide an evaluation to this forum to ask for your support again to expand this scheme to the wider City institutions such as the Barbican, Markets, and educational and community centres across the City of London Corporation.

Proposals

11. If the recommended option 2 is chosen, the Guildhall, Mansion House, Central Criminal Court, Bastion House and Libraries already have reception/security staff who can be trained, space for people to take a stop and make a call, landlines and toilets that the public can use. This covers most of what is required to become a Safe Haven. The one-hour training can be rolled out to start the accreditation.
12. The named premises proposed are provisional at present and further internal consultation will be required as to ascertain any security implications and any other emerging issues in due course before any list is finalised or further publicised.
13. By supporting this initiative, we will lead by example, promote safety within and across the Square Mile, motivate and encourage other businesses to become part of the Safe Havens scheme, and work actively to provide safe places for women and girls.

Corporate & Strategic Implications

14. There are no strategic implications directly related to this report.

- Financial implications – N/A
- Resource implications – N/A
- Legal implications – N/A
- Risk implications – N/A
- Equalities implications – N/A
- Climate implications – N/A
- Security implications – N/A

Appendices

- Appendix 1 – Safe Haven Information, Safer Business Network

Valeria Cadena

Community Safety Manager
Community and Children's Services

T: 0207 332 1272

E: valeria.cadena@cityoflondon.gov.uk

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Committees: Community and Children’s Services Committee – For decision Police Authority Board – For decision Policy and Resources – For decision	Dated: 13/12/2023 13/12/2023 14/12/2023
Subject: City of London Anti-Social Behaviour Policy	Public
Which outcomes in the City Corporation’s Corporate Plan does this proposal aim to impact directly?	
Does this proposal require extra revenue and/or capital spending?	N
If so, how much?	£
What is the source of Funding?	N/A
Has this Funding Source been agreed with the Chamberlain’s Department?	N/A
Report of: Judith Finlay, Executive Director of Communities and Children’s Services	For Decision
Report author: Valeria Cadena, Community Safety Manager, Department of Community and Children’s Services	

Summary

The purpose of this report is to share with members the new City of London Anti-Social Behaviour (ASB) Policy. In the Square Mile, the City of London Corporation and the City of London Police are the first responders to incidents of anti-social behaviour. The policy aims to bring clarity to members and the public on how the city deals with all the different types of ASB.

Recommendations

Members are asked to:

- Note the report.
- Support the publication of the ASB Policy.

Main Report

Background

1. The City of London is a safe and pleasant place to live, work and visit, with low levels of crime compared to other areas. However, its unique geographical area and authority presents complex problems that are unique to this area. Issues range from having a distinctive ASB challenge to supervising a safer, vibrant and modern night-time economy.

2. To bring clarity on how we deal with ASB in the Square Mile, the Department of Community and Children's Services, in partnership with other corporation departments and City of London Police have produced a new ASB Policy (Appendix 1) to share with our communities.
3. The Government definition of ASB according to the Anti-Social Behaviour, Crime and Policing Act 2014 is:
 - Conduct that has caused or is likely to cause harassment, alarm, or distress to any person
 - Conduct capable of causing nuisance or annoyance to a person in relation to that person's occupation of residential premises, or
 - Conduct capable of causing housing-related nuisance or annoyance to any person.
4. The definition is quite broad and covers a wide range of behaviours. It may include, but it is not limited to, noise, physical violence, intimidation, harassment, verbal or written abuse, threats of violence, vandalism, drug misuse and drug dealing, environmental nuisance, and hate crime.
5. Anti-social behaviour can be categorised into three main types, depending on how people are affected:
 - a. Personal anti-social behaviour: when a person targets a specific individual or group.
 - b. Nuisance anti-social behaviour: when a person causes trouble, annoyance or suffering to a community.
 - c. Environmental anti-social behaviour: when a person's actions affect the wider environment, such as public spaces or buildings.
6. The City of London Police are one of the Square Mile's first responders and are responsible for dealing with ASB reports that fall outside of the remit of the Corporation. This will include public disorder, crime, and nuisance behaviour.
7. There are no set guidelines on when ASB becomes a criminal offence and fundamentally a police issue. However, often the actual act may be criminal and the behaviour before during or after the act may be considered ASB.
8. The Corporation has teams within the departments of Public Protection, City Operations, and Community and Children's Services that respond to ASB. The Housing Service, Noise Service and Street Enforcement Officers within those departments have public procedures in place for how their officers address ASB.
9. The 2022–2025 City of London Safer City Partnership Strategy has seven priorities, with a view to deliver on its mission statement: "To make the Square Mile a safe place for people to live, learn, work or visit". Reducing and preventing

Neighbourhood Crime and anti-social behaviour, including those linked to the night-time economy, is one of those aims.

Current Position

10. The intention of this policy is to ensure clarity across our communities on how the City Corporation and City Police deal with ASB, and what areas are dealt with by both. For example, the Corporation's response structure is certainly different from other local authorities (see Appendix 2). ASB is reported to different committees depending on where the departments and teams report, therefore it is important to try to paint the whole picture for everyone's information.
11. In developing this policy, meetings were held with the relevant departments, teams and service managers to ensure that the uniqueness of each department or service was considered. This policy has also been discussed at the ASB Strategic Group and is co-chaired by the Director of City Operations and Chief Superintendent for Uniform Policing.

Proposals

12. The City of London ASB Policy has been drawn up in line with changing government policy, a further revision of the Statutory Guidance for Frontline Professionals of the ASB Act 2014, the Housing White Paper and the ASB Action Plan set by central government, and to reflect issues in the local community and ways of tackling them. i.e. county lines, cuckooing (using a vulnerable person's property as a base to conduct criminal activity), and serious youth violence.
13. The policy also incorporates the requirement for ASB Case Reviews (previously known as the Community Trigger) which were introduced in the ASB Act 2014 to give victims and communities subjected to repeat ASB a mechanism to have their case independently and professionally reviewed.
14. We have reviewed and researched work across the Corporation's services and departments, and members of the Safeguarding Children Partnership (SCP) including the police. We have assessed what the new policy should include and ensured that each department has the tools they need to respond to different forms of anti-social behaviour. This work aims to provide better outcomes for Square Mile residents and visitors.

Corporate & Strategic Implications

15. Strategic implications – The adoption of a Corporate ASB Policy is expected to bring understanding of the delivery of ASB management and ensure compliance throughout the City of London.
 - Financial implications – None

- Resource implications – None
- Legal implications – This proposal is intended to ensure the City Corporation’s compliance with statutory requirements.
- Risk implications – None
- Equalities implications – None
- Climate implications – None
- Security implications – None

Conclusion

16. The City of London is committed to keeping people safe and feeling safe, which is recognised within the Corporate Plan. The ASB Policy further commits the Corporation to this aim in standardising the approach to ASB investigation and management.

Appendices

- Appendix 1 – City of London Corporation Anti-Social Behaviour Policy
- Appendix 2 – Map of all City Corporation teams dealing with ASB

Valeria Cadena

Community Safety Manager

Department of Community and Children’s Services

T: 020 7332 1272

E: valeria.cadena@cityoflondon.gov.uk



City of London

Anti-Social Behaviour Policy 2023

Produced by:	Community Safety Team, Department of Community and Childrens Service
Approved by:	Safer City Partnership
Original Approval Date:	2 October 2023
Next Review Date:	October 2024

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1. Introduction

This document sets out the City of London Corporation's ambitions to tackle anti-social behaviour (ASB). It says what we want our services to achieve for people experiencing ASB and details the kind of service level and quality we aim to provide. It also explains the broad approach we have agreed to adopt to support and advance our objectives.

1.1 Policy statement

The City of London Corporation will not tolerate ASB directed towards anyone in the city, including our residents, workers, students, or Corporation staff. This policy sets out our pledge to tackle ASB and the approaches we will use to tackle ASB.

We will ensure that three key approaches are used in tackling all cases of ASB:

- Early intervention and prevention to resolve the problem as quickly as possible
- Partnership working with appropriate agencies
- Enforcement using the full range of informal and legal tools available.

1.2 Equality and diversity

The City of London Corporation is committed to promoting equality within the delivery of its services to ensure that everyone is treated with respect, dignity, fairness and, above all, that they are not discriminated against.

The Equality Act 2010 provides a framework to ensure that Corporation services are not provided in a discriminatory manner, ensuring that there is a formalised approach in place when considering legal action against an individual who is known or suspected of having a protected characteristic.

This means that, under this policy, the Corporation will:

- Demonstrate that we have considered any vulnerability identified within the Act when deciding to proceed with legal action
- Have concluded that legal action is needed due to the effect of the ASB on either the wellbeing of the victim and/or the perpetrator
- Ensure that the proposed legal action is a proportionate response to the ASB in accordance with the City of London Enforcement Policy.

2. Policy summary

2.1 Understanding anti-social behaviour

The City of London Corporation's anti-social behaviour (ASB) policy sets out the objectives for the Corporation's ASB services and is committed to tackling ASB through early intervention, partnership working and enforcement.

The definition of ASB according to the Anti-Social Behaviour, Crime and Policing Act 2014 is:

- Conduct that has caused or is likely to cause harassment, alarm, or distress to any person.
- Conduct capable of causing nuisance or annoyance to a person in relation to that person's occupation of residential premises, or
- Conduct capable of causing housing-related nuisance or annoyance to any person.

ASB covers a wide range of behaviours. It may include, but it is not limited to, noise, physical violence, intimidation, harassment, verbal or written abuse, threats of violence, vandalism, drug misuse and drug dealing, environmental nuisance and hate crime.

The City of London Police are the Corporation's first responders and are responsible for dealing with ASB reports that fall outside of the remit of the City of London Corporation. This will include public disorder, crime, and nuisance behaviour.

The City of London Corporation has teams within the Housing Service, Public Protection, City Operations, and Community and Children's Services that respond to ASB. The Housing Service, Public Protection and City Operations have public procedures in place for how their officers address ASB.

2.2 Principles of addressing anti-social behaviour

The City of London Corporation's ASB policy is founded on five principles, which were developed by the Home Office Anti-social Behaviour Strategic Board.

- Victims should be encouraged to report ASB and expect to be taken seriously.
- We will have clear and transparent processes to ensure that victims can report ASB concerns.
- We will work in partnership to identify, assess, and tackle ASB and its underlying causes.
- The public's ASB concerns will be considered with strategic needs assessments for community safety and will deliver a holistic approach.
- Adults and children who exhibit ASB should have the opportunity to take responsibility for their behaviour and repair the harm caused by it.

3. Definition of anti-social behaviour

The Anti-Social Behaviour, Crime and Policing Act 2014 defines ASB as:

- Conduct that has caused or is likely to cause harassment, alarm, or distress to any person.
- Conduct capable of causing nuisance or annoyance to a person in relation to that person's occupation of residential premises, or
- Conduct capable of causing housing-related nuisance or annoyance to any person.

Although there are many behaviours that can be disruptive and inconvenient, they are not always ASB. The City of London Corporation will therefore assess each case to decide if it is or is not ASB.

3.1 ASB may include (but is not limited to):

- noisy and/or abusive behaviour
- vandalism
- graffiti
- intimidation
- public drunkenness
- littering
- fly-tipping
- illegal drug use
- excessively barking dogs
- hate behaviour directed at a person's:
 - race or nationality
 - gender
 - sexual orientation
 - disability
 - faith.

3.2 What is not ASB

Some behaviour, even though it may cause nuisance to individuals, will usually not be regarded as ASB, but will be assessed on an individual basis. For example, this can include:

- one-off parties and barbecues
- infrequent and occasional noise or disturbances
- children's play
- occasional dog barking
- excessive noise from domestic appliances (e.g. washing machines, vacuum cleaners)
- minor vehicle repairs
- gossip
- escalated disputes.

Rough sleepers should be referred to [StreetLink](#).

4. Objectives

The Corporation's ASB policy is founded on the following five objectives:

4.1 **Victims should be encouraged to report ASB and expect to be taken seriously.**

Our policy is to:

- Make people aware of what ASB is
- Publicise and promote our various services to combat ASB
- Seek to respond to each reported case of ASB as quickly as possible
- Support victims of ASB throughout the case
- Encourage and support victims to report criminal behaviour to the police.

4.2 **We will have clear and transparent processes to ensure that victims can report ASB concerns.**

Our policy is to:

- Treat all reports as confidential, sharing information only within data protection laws and information-sharing agreements
- Ensure that all ASB incidents reported that involve criminal behaviour is reported to the police
- Quickly refer cases between the different departments of the Corporation, the police, and other agencies as necessary
- If any person is dissatisfied with an ASB investigation, signpost to the Corporation's complaints process and the ASB Case Review (formally known as the Community Trigger).

4.3 **We will work in partnership to identify, assess, and tackle ASB and its underlying causes.**

Our policy is to:

- Take any necessary early intervention to protect people and property
- Take it into account (and adjust our approach as necessary) when a victim or a perpetrator is a vulnerable person
- Not necessarily intervene in low-level disputes between households concerning lifestyle differences, for example, noise made by younger children playing in their home, garden or in communal areas, or parking disputes involving non-allocated spaces.

4.4 **The public's ASB concerns will be considered with strategic needs assessments for community safety and will deliver a holistic approach.**

Our policy is to:

- Participate in relevant strategic or preventative initiatives
- Participate in permanent or ad-hoc multi-agency workgroups dealing with specific ASB issues
- Work with housing providers, businesses, and other agencies by providing professional advice and support, to assist with their ASB investigations.

4.5 Adults and children who exhibit ASB should have the opportunity to take responsibility for their behaviour and repair the harm caused by it.

Our policy is to:

- Use any of the tools and powers available to us under the law and Corporation policy, including those tools and powers that do not require Court action
- Support the police in the use of Community Resolution, for incidents of ASB at the lower level of harm or risk
- Facilitate an apology from the perpetrator to the victim, in a manner that the victim supports
- Ensure any restitution is forthcoming in a timely fashion.

5. Responding to reports of anti-social behaviour

5.1 Teams within the Square Mile who respond to reports of ASB

The City of London Corporation has teams within the Housing Service, Public Protection, City Operations, and Community Safety that respond to ASB. The City of London Police are responsible for dealing with ASB reports that fall outside of the remit of the City of London Corporation. This will include public disorder, crime, and nuisance behaviour.

The City of London Corporation has a separate [ASB policy for tenants in Housing stock](#): where ASB occurs in or around the City's Housing Estates, or wherever Housing Service staff are working, the Housing Service ASB policy will take precedence over this policy.

5.1.1 The Housing Service will investigate and respond to:¹

- ASB incidents (including environmental ASB) that occur in the Corporation's Housing Revenue Account (HRA) housing estates, the City of London and Gresham Alms houses, and commercial properties managed as part of HRA estates
- ASB that affects residents and their households or visitors, commercial tenants, City of London Corporation staff, agents, and contractors
- Disputes between the Corporation's Housing tenants.

5.1.2 Port Health and Public Protection respond to:²

- Protecting consumers and working with businesses to bring them into compliance with licensing legislation

¹ Department of Community and Children's Services, Housing Service, Anti-social Behaviour Policy

² Port Health and Public Protection Policy Statement on Enforcement

- Enforcing all noise and nuisance legislation (there is a service level agreement with the Street Environment Team to provide an out-of-hours noise response)
- Ensuring that all licensed premises comply with legislative provisions and promote the licensing objectives for the prevention of crime and disorder, public safety, the prevention of public nuisance and the protection of children from harm
- The enforcement of illegal street trading and buskers.

5.1.3 City Operations will respond to:

- The enforcement of littering, fly tipping, graffiti, flyposting, and other types of environmental ASB
- Cleansing of ASB sites
- Parking enforcement
- Highway licensing.

5.1.4 The Community Safety Team (CST) will respond to:

- The CST receive referrals from another Corporation teams or an external agency working in the City. The CST do not receive referrals directly from the public.
- The CST will investigate and lead on ASB multi-agency cases, where responsibility for investigation does not sit within another organisation or City of London Corporation team, for example, City of London Police, Port Health and Public Protection and Housing Services
- Cases requiring a multi-agency response.

Examples of cases that the CST will oversee are:

- ASB incidents that pose a risk to individuals or the community
- ASB that is taking place in any public place or place to which the public have access that poses a risk to individuals or the community.

The CST will also provide advice and guidance to other Corporation teams or external agencies.

When ASB is reported to a department within the Corporation and it does not fall within the department's remit, they will refer the incident to the CST by completing an ASB referral form.

5.1.5 The City of London Police will respond to:

ASB involving criminal behaviour should be reported to the Police [online](#) or by calling 101 for non-emergencies, or 999 in an emergency. The 999 number should only be used when:

- it is an emergency
- a crime is in progress
- someone suspected of a crime is nearby
- there is danger to life
- violence is being used or threatened.

ASB can also be reported to Crimestoppers on 0800 555 111. Those making reports can choose to remain anonymous. This will be taken into consideration by officers when undertaking an investigation.

Contact details for all services can be found at Appendix A.

6. Categorising and prioritising reports of anti-social behaviour

6.1 Severity of ASB and risk assessments

- Reports of personal ASB can be classified as low, medium or high risk. Corporation officers will contact the complainant to ask a series of questions to assess the potential risk of harm caused by the ASB.
- If the ASB involves the use or threat of violence or there is a significant risk of harm (for example, a hate crime/incident), an officer will aim to contact the complainant within one working day. For all other reports of ASB, an officer will aim to contact the complainant within five working days. For reports of noise pollution, the Public Protection Team has its own attendance standards which can be found on the City of London website: [Disturbed by noise in the Square Mile? - City of London](#)
- If a victim's risk assessment score is high, then the Corporation officer will consider whether a referral should be made to an appropriate agency.

6.2 Factors indicating risk

While risk can be a subjective judgement, Corporation officers will look for key indicators to help them understand the potential severity of risk:

- How serious the incident is – officers will consider whether the behaviour consists of threats of violence, actual violence, or if there is a genuine risk of harm.
- Is the behaviour directed at the complainant – in some cases, the complainant may be experiencing ASB which is not directed at them specifically (for example, someone playing music and disturbing a neighbour). If the behaviour is targeted at the complainant (for example, physical abuse), then this is a higher risk. This risk is further escalated if the incident is motivated by hate for a protected characteristic.
- How often the incidents are happening – if they are more frequent, then the harm caused is likely to be higher.
- The proximity of the perpetrator – if the perpetrator is in close, regular proximity to the complainant, then the opportunity to encounter each other is high and therefore so is the risk of further incident and harm. This may cause psychological harm to the victim.
- Whether the victim has mental or physical ill-health – this may affect how resilient the victim is to the problem and the impact the ASB has on them.
- Whether the victim has previously been a victim of ASB or crime – that is, repeat victims.
- Whether they have friends or family around them – if the victim does not have a support network, or feels isolated, the risk of harm is likely to be higher.

7. Enforcement

The Anti-Social Behaviour, Crime and Policing Act 2014 was introduced to streamline different articles of legislation and provides the Corporation and the police tools and powers to address ASB.

Enforcement action should follow a stepped approach, exhausting non-legal remedies before deciding on legal action. However, there may be occasions that the behaviour is so serious that it precludes non-legal action and warrants immediate legal sanction.

The process for case management and decision making is dealt with in the Standard Operating Procedure document.

7.1 Informal action

If the behaviour is assessed as being at a low or medium level and the victim risk assessment concurs, non-legal enforcement may be appropriate.

Warning letters – a formal letter from the Corporation outlining the complaint and a record of which will be held on file, should the behaviour reoccur.

Community remedy – when a criminal offence or ASB incident has been admitted, the police can instruct the perpetrator to undertake an act to compensate the victim, in lieu of court proceedings.

Acceptable Behaviour Contracts (ABCs) – a voluntary written agreements between persons who have been involved with ASB.

7.2 Legal enforcement

Community Protection Notice – to stop a person aged 16 or over, a business or organisation committing ASB that spoils the community's quality of life.

Civil Injunction – to quickly stop or prevent individuals engaging in ASB, nipping problems in the bud before they escalate.

Without notice (ex-parte) Injunctions – as above, but the perpetrator is not made aware of the application. Without notice, injunctions are likely to be used where violence has been used or threatened or is likely to happen.

Criminal Behaviour Order – issued by a criminal court against a person who has been convicted of an offence, designed to tackle the most persistently anti-social individuals who are also engaged in criminal activity.

Closure Power – to allow the Police or the Corporation to close premises quickly which are being used, or likely to be used, to commit nuisance or disorder.

Public Spaces Protection Order – designed to stop individuals or groups from committing ASB in a public space.

7.3 Surveillance – the Regulation of Investigatory Powers Act policy and procedure

The Regulation of Investigatory Powers Act 2000 (RIPA) regulates surveillance carried out by public authorities in the conduct of their business, specifically: the monitoring, recording and interception of communications; the requisition, provision, and handling of communications data; and the use of directed covert surveillance.

Before undertaking surveillance under RIPA, an authority must be satisfied that it is undertaken in connection with a core function and is necessary, proportionate, and lawful. It is essential that all Corporation officers read and refer to the City of London Corporation's RIPA Policy and Procedure documents before submitting an operation application form.

8. Multi-agency working

Dealing with ASB cases sometimes requires involvement from statutory and non-statutory partnership agencies. As well as working closely with enforcement agencies such as the Police, registered social landlords will have access to more appropriate enforcement actions within tenancy breaches. We acknowledge that sometimes both complainants and alleged perpetrators may be vulnerable and may benefit from a referral to an appropriate support service.

Reports of ASB may be discussed at a multi-agency forum to ensure that a coordinated response is taken, involving the relevant partners to resolve the ASB problem. Such forums may include the:

- Homelessness and Rough Sleeping Task and Action Group
- City of London Corporation City Community Multi-Agency Risk Assessment Conference
- ASB in the Night-Time Economy (NTE)
- ASB Case Review (formerly the Community Trigger)

8.1 Homelessness and Rough Sleeping Task and Action Group

The Homelessness and Rough Sleeping Task and Action Group is a multi-agency meeting led by the Homelessness and Rough Sleeping team to support the most vulnerable long-term rough sleepers in the City of London. The aim of the group is for professionals to support the work undertaken by the City of London commissioned Outreach team in sourcing collaborative, innovative and integrated solutions to individual rough sleepers who present with complex and difficult needs.

Through effective partnership working, the group aims to resolve areas of support that compound the individual's current homelessness. The group has an agreed terms of reference in place.

8.2 City Community Multi-Agency Risk Assessment Conference

The City of London Corporation Community Multi-Agency Risk Assessment Conference (CCM) is a multi-agency meeting where representatives from the statutory and voluntary sectors share information on vulnerable ASB victims, ASB perpetrators and ASB hotspot locations.

After sharing all relevant information about a victim, perpetrator or location, the representatives discuss options for increasing the safety of the victim, perpetrator, or location and turn these into a co-ordinated action plan.

The aim is to identify the highest risk, most complex cases and solve the issues of concern. Victims also include those experiencing hate crime.

The focus of the CCM is on managing the risk to the vulnerable victim and/or perpetrator and providing options for increased safety. The CCM also considers other people affected and manages the behaviour of any perpetrator. The panel will decide on the best approach to managing the overall risk to the victim, perpetrator, or community and on effective safety planning strategies.

Information shared at the CCM is confidential and is only used for the purpose of reducing the risk of harm and safeguarding those at risk.

8.3 ASB in the Night-Time Economy (NTE)

ASB in the Night-Time Economy is discussed within the Licencing Leasing Partnership (LLP) and meets weekly to discuss any issue surrounding the NTE. This includes crime relating to licensed premises or by perpetrators who have visited licensed premises, ASB, noise issues and any other emerging trends. As the remit of the meeting is broad, representatives attend from the Police, CoLP Licensing Team, CoLC Licensing Team, Port Health & Public Protection and the Community Safety Team.

8.4 ASB Case Review (formerly the Community Trigger)

The Anti-Social Behaviour, Crime and Policing Act 2014 introduced specific measures designed to give victims and communities a say in the way that ASB complaints are dealt with. This includes the Anti-Social Behaviour Case Review, (formerly known as the Community Trigger), which gives victims of persistent ASB reported to any of the main responsible agencies (such as the local authority, police, and housing providers) the right to request a multi-agency case review where a local threshold is met.

The City of London Corporation has a duty to carry out an Anti-Social Behaviour Case Review on request when a case meets the threshold. The threshold is met when:

- At least three separate qualifying complaints of ASB or hate incidents must have been made within the past six months
- No action has been taken
- The case has been closed and the original problem persists.

Applications for an Anti-Social Behaviour Case Review may either come directly from the victims of ASB or from a third party (with the victim's written consent), such as a family member, friend, or local elected representative (a councillor or MP). The victim may be an individual, a business or a community group.

9. Publicity and data control

The City of London Corporation Communications Team will, wherever appropriate, liaise with Police press offices to publicise its work, to promote positive case outcomes and reassure residents of its ability to tackle and prevent ASB.

9.1 Information sharing and confidentiality

Information sharing should not be seen as a barrier to successful action. In cases where informed consent is not given (i.e., a request for information is made without the subject's knowledge or consent), for the prevention of crime and disorder or to protect vulnerable people, lack of consent should not be seen as a barrier to action.

The City of London Corporation will treat all information received with the strictest of confidence. At times it is imperative to understand that, in certain circumstances, we may have a legal obligation to share relevant information with other statutory agencies, especially where there is a need for the prevention and detection of crime or safeguarding concerns.

We have a duty to share information with partnership agencies as defined in the Crime and Disorder Act 1998 and in accordance with the Data Protection Act 1998 and data-sharing protocols.

9.2 Crime and Disorder Act 1998

Section 115 of the Crime and Disorder Act 1998 allows for the exchange of information where the disclosure is necessary or expedient for the purposes of any provision of the Crime and Disorder Act 1998, or amendments to that legislation.

The information, whether from a private individual or a member of a public body, can be disclosed to a relevant authority or a person acting on behalf of such an authority.

Under the Act, the City of London has the Community Safety Partnership information-sharing protocol.

9.3 Data Protection Act 2018

The non-disclosure provision of the Data Protection Act 2018 does not apply where a disclosure is for the purposes of (section 29):

- the prevention and detection of crime, or
- the apprehension or prosecution of offenders,
- where failure to disclose would be likely to prejudice those objectives in a particular case.

To satisfy these terms, any request for personal information, where the purpose is the prevention or detection of crime, should specify as clearly as possible how failure to disclose would prejudice this objective.

For example, if a social landlord wanted information from the police to assist them in civil proceedings, their request should make it clear why the proceedings are necessary and how a successful action could prevent crime.

9.4 Human Rights Act 1998

Article 8(1) of the Human Rights Act 1998 states that everyone has the right to respect for his private and family life, his home, and his correspondence. This right is not absolute – interference can be justified in the interests of the prevention of disorder or crime.

10. Monitoring the service

10.1 Case supervision

Each team within the Corporation that has a responsibility to investigate ASB has its own service standards and procedures. However, the manager or nominated officer will conduct reviews of cases and will consider that:

- Service standards have been/are being adhered to
- All actions arising during the case investigation are accurately recorded
- All avenues of investigation have been explored, with all witnesses contacted and any problem-solving opportunities considered
- All documents, letters, statements, and evidence have been scanned and attached to the case, and all hard copy documents retained for the potential of future legal action
- All guidance and direction previously provided to the investigating officer has been actioned and cases are progressing in accordance with any planned timescales.

10.2 Complaints

The City of London Corporation is committed to always providing the best possible service, but sometimes mistakes are made. If this happens, we want customers to contact us and let us know.

Where complaints cannot be resolved by local managers and exhaust the Corporation's complaints procedure, complainants will be referred to either the Local Government Ombudsman, depending on the case issues and the complainant's tenure.

If an individual or organisation has a complaint, compliment, or comment about the City of London Corporation, they can talk to the member of staff concerned or the relevant team manager. Contact details will be provided for all teams.

10.3 Performance monitoring

The performance of this policy will be monitored by the ASB Strategic Delivery Group.

The group will ensure that all collated performance data is purposeful and adds value to the work of the organisation insofar as it ensures that senior managers and key partners are fully informed of ASB performance and can be used to influence procedural improvements.

Data relating to enquiries and cases logged within the City of London Corporation Community Safety Team's case management systems will be extracted through tailored reports for performance measurement, management purposes and corporate monitoring.

10.4 ASB policy review

This document will be reviewed on an annual basis, as a minimum, to ensure that it remains relevant and up to date.

11. Appendix

Service contact details:

City of London Police

Emergency – 999

Non-emergency – 101

Online [Home | City of London Police](#)

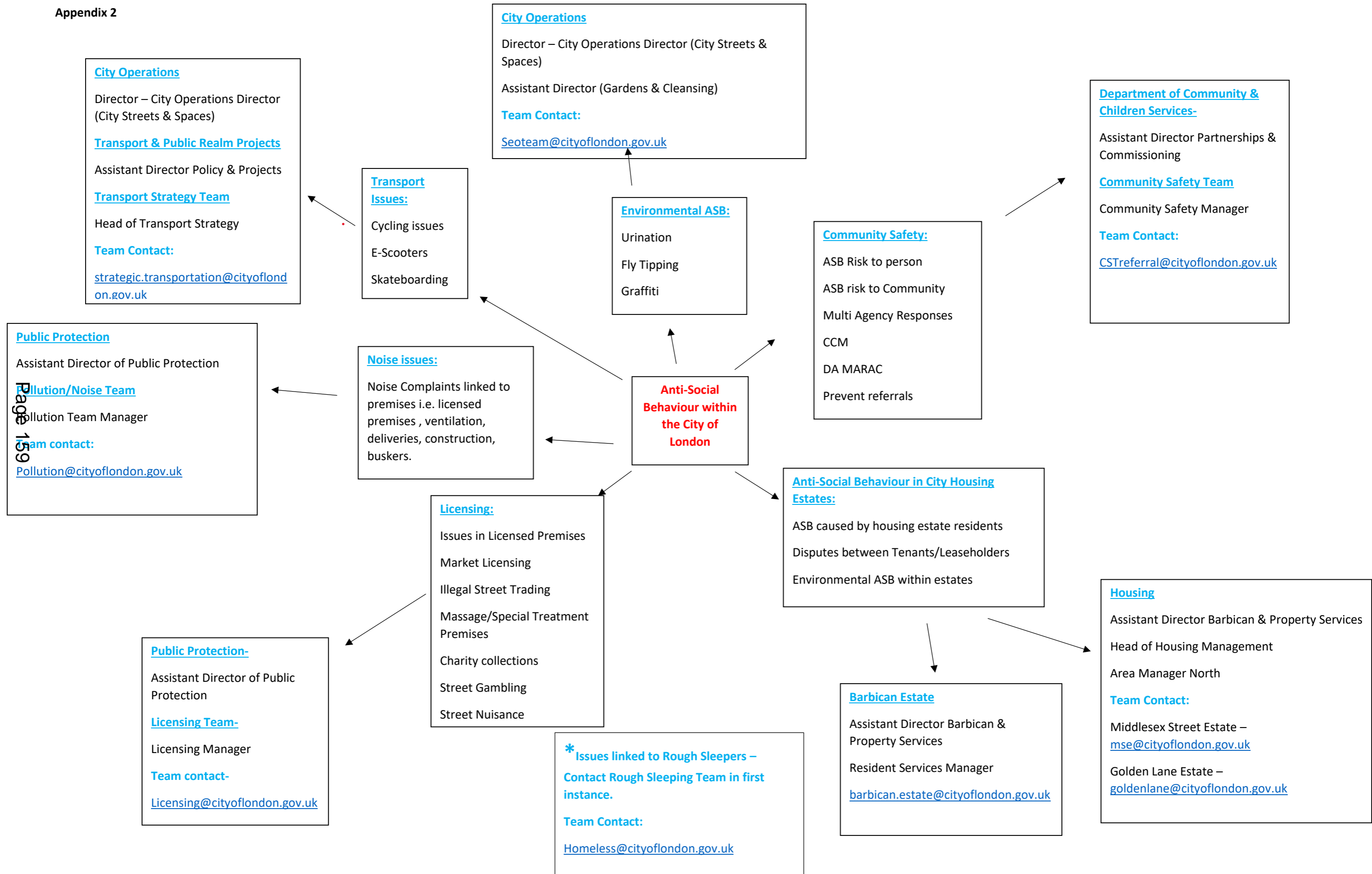
City of London Corporation

Switchboard – 020 7606 3030

Online Service Enquiry form [Online Service Enquiry Form - Online Enquiry - My City \(cityoflondon.gov.uk\)](#)

Direct services contact – [Contact the City Corporation - City of London](#)

Appendix 2



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Agenda Item 11

<p>Committees: Equality, Diversity and Inclusion Sub-Committee – For discussion</p> <p>Community and Children Services – For decision</p> <p>Policy and Resources – For decision</p> <p>Court of Common Council – For decision</p>	<p>Dated:</p> <p>11th December 2023</p> <p>13th December 2023</p> <p>14th December 2023</p> <p>11th January 2024</p>
<p>Subject: CoL Care Experienced as a Protected Characteristic Policy approval</p>	<p>Public</p>
<p>Which outcomes in the City Corporation’s Corporate Plan does this proposal aim to impact directly?</p>	<p>Contribute to a flourishing society</p> <ol style="list-style-type: none"> 1. People are safe and feel safe. 2. People enjoy good health and wellbeing. 3. People have equal opportunities to enrich their lives and reach their full potential. 4. Communities are cohesive and have the facilities they need.
<p>Does this proposal require extra revenue and/or capital spending?</p>	<p>No</p>
<p>If so, how much?</p>	<p>NA</p>
<p>What is the source of Funding?</p>	
<p>Has this Funding Source been agreed with the Chamberlain’s Department?</p>	<p>NA</p>
<p>Report of: Judith Finlay, Director Community and Children’s Services</p>	<p>For Decision</p>
<p>Report author: Chris Pelham, Assistant Director People Directorate, Community and Children Services</p>	

Summary

In May 2022, the Independent Review of Social Care published its final report to Government: [Final Report - The Independent Review of Children's Social Care](#). The review looked in-depth at the experience of care, including the experience of people

who had been in care. The review considered extensive feedback and consultation from public bodies, national voluntary organisations and charities, on the experiences of care. The final report recommended that Government should make care experience a protected characteristic.

The Government chose not to implement this recommendation, but local authorities across the country are taking their own action to adopt this principle within their local authority policy and procedural arrangements.

In January 2023, Lambeth became the first London local authority to commit to treating care experience as an additional equality strand, alongside the protected characteristics set out in the Equality Act 2010. Since then, six more London local authorities have made this commitment, and all other London local authorities are considering this as part of their commitment to the London Care Leavers Compact. This is in addition to a further 24 local authorities nationally, with many more making progress on approvals to also adopt the Compact.

The London Care Leavers Compact was established in 2022 to deliver a consistent and high-quality offer for care leavers across the capital. Supported by the Department for Education's funded London Innovation and Improvement Alliance, the Compact provides a framework for all London local authorities to develop consistency, breadth and quality in the support offered to London's care leavers.

The City of London's own Corporate Equalities Objectives set out our commitment to meeting the ambitions of the London Care Leaver Compact.

A report was presented to the Safeguarding Sub-Committee in June 2023, noting the progress that the City of London Corporation (CoLC) has made in respect of the Care Leavers Compact. The report also highlighted our commitment to having care experienced adopted as a protected characteristic.

This report is seeking approval to adopt a specific City of London policy approving care experienced as a protected characteristic (see Appendix 1). In doing so, the CoLC will be further demonstrating its ambitions towards improved opportunities for care leavers in line with the CoLC's wider commitment to strengthening social mobility and equal access opportunities for all.

The policy will go to the Equality, Diversity and Inclusion Sub-Committee for information/discussion, then Community and Children's Services Committee and Policy and Resources Committee for approval and, if approved, it will continue on to the Court of Common Council for approval.

Recommendations

Members are asked to:

- Endorse the CoLC's recognition of care experienced as if it were a protected characteristic where practicable and, in doing so, approve the CoLC's specific policy, 'Care Experienced as a Protected Characteristic' (Appendix 1).

Main Report

Background

1. A CoLC care leaver is a young person aged between 18 and 25 who has been looked after by the CoLC for more than 13 weeks after their 14th birthday, including some time after their 16th birthday. All CoLC care leavers are entitled to access support from the Children Social Care Service. We proactively encourage them to engage with this support through the allocation of a qualified social worker throughout their period in care, up to the age of 25 years. Care leavers are also referred to as 'care experienced', which is reflected in this paper and the 'Care Experienced as a Protected Characteristic' policy.
2. The Independent Review of Children's Social Care headed by Josh MacAlister published a final report in May 2022 that noted:

Many care experienced people face discrimination, stigma, and prejudice in their day to day lives. Public perceptions of care experience centre on the idea that children are irredeemably damaged and that can lead to discrimination and assumptions being made. One young person told the review that a teacher had told them "You're smart - for a kid in care", another young person said "I don't want people to point out that I am in care if I don't want that mentioned. It makes me so cross – that shouldn't happen."

This stigma and discrimination can be explicit, and often comes with assumptions about the likely characteristics of children and adults that have care experience. They can also be implicit and are evidenced in the way care experience is discussed in schools, workplaces, and the media. At its worst this can lead to care experienced people being refused employment, failing to succeed in education or facing unfair judgements about their ability to parent when they have children and families of their own. Hearing testimony from care experienced people sharing the discrimination they have experienced, even from a very young age, it is clear that such discrimination can be similar in nature to other groups that have a legally protected characteristic under the Equality Act (2010). So, while there may be ways that society can help reduce stigma and discrimination, including creating greater public consciousness on these issues, just as with other areas of equality, there is a case to go further. Therefore, the government should make care experience a protected characteristic.

3. The Government chose not to implement this recommendation, but councils across the country are now taking their own action. Seven London local authorities have currently adopted care experienced as a protected characteristic, with all other London local authorities exploring this option as part of the wider regional work of the London Care Leavers Compact. This is in addition to 24 other local authorities nationally adopting care experienced as a protected characteristic.

4. The City of London, alongside the other 32 London local authorities, is committed to meeting the goals and ambitions of the London Care Leaver Compact and has set this out in our own Corporate Equalities Objectives.
5. Furthermore, as part of the CoLC commitment to the Care Leaver Compact, the City of London will be working with partners across the Square Mile to enhance employment and training opportunities for all care leavers. This workstream will align with Destination City ambitions and support the CoLC to improve social mobility opportunities for people who are care experienced.
6. As corporate parents, all council officers and Members share a collective responsibility to ensure that care experienced children and young people who may have had disrupted experiences of family life get the support they need to live the happiest and healthiest lives possible. This includes responsibilities to:
 - Ensure that the support we provide to our care experienced children and young people is of the same quality we would expect for our own children
 - Challenge the negative attitudes and prejudice that exist in relation to care experienced children and young people in all aspects of society
 - Act as champions for the needs of our looked-after children and care leavers in all our spheres of influence
 - Proactively seek out and listen to the voices of our care experienced children and young people when developing new council policies.
7. As already noted, the Independent Review of Children's Social Care 2022 recommended that:

“Government should make care experience a protected characteristic” and “new legislation should be passed which broadens corporate parenting responsibilities across a wider set of public bodies and organisations.”
8. While this recommendation was not implemented by the Government, having a specific CoLC policy that recognises care experienced should where practicable be treated as a protected characteristic will demonstrate our commitment to challenging and eliminating discrimination and prejudice against this group of young people.

Current Position

9. As at the start of November 2023, the CoLC was supporting 56 care leavers. Of this group, 89% were in employment, education or training, and 96% were in suitable accommodation.
10. In respect of our commitment to the London Care Leaver Compact, specific CoLC examples include:
 - Our policy of making Council Tax exempt for all our care leavers

- Meeting the cost of using Transport for London bus services for our care leavers
- Prioritising our care leavers within our housing allocations policy.

11. CoLC Members have always demonstrated a commitment to supporting our care experienced population. Following a focused visit of our care leaving services in November 2018, Ofsted noted that:

“Care leavers in the City of London benefit from a strong service that ensures that they are very well supported. They receive effective help which enables most to achieve good outcomes. There is a determined and appropriately ambitious political and corporate focus to sustain and improve outcomes for care leavers.”

12. Furthermore, in 2020, during the full Inspection of Children Social Care Services, Ofsted judged the experience and progress of ‘Children in Care and Care Leavers’ to be “Outstanding” noting the following:

- Children in care and care leavers are extremely well supported.
- Commitment to ensuring that needs are met is demonstrated by senior leaders, councillors, health partners and children’s social workers, resulting in an extremely good level of service.
- Extremely strong involvement and interest from council members.
- Particular sensitivity shown regarding cultural diversity.
- Strong use of advocacy and independent visiting.
- Good housing offer, with support and moving only when ready.

13. In 2023 Ofsted introduced a separate judgement on care leavers, in recognition of the unique set of presenting needs of this cohort of young people.

14. Oversight and monitoring of the impact of policy and service performance in respect of our young people who are care experienced is reported to the Safeguarding Sub-Committee, Chaired by the Chair of Community and Children’s Services.

15. Establishing a specific CoLC policy will treat care experienced as a protected characteristic and will further demonstrate our continued ambition and commitment to delivering outstanding support for our care experienced population. The proposed change will extend the protection against direct and indirect discrimination to this group in our local policy and practice. It should be noted that the requirement to make “reasonable adjustments” under the Equality Act (actions and alterations to increase accessibility) applies specifically and only to the protected characteristic of disability. Any local change will remain consistent with that requirement and limitation in order not to create the risk of discrimination against other protected characteristics.

Options

16. There are two options:

- a) For Members to approve that the CoLC should treat care experienced as if it were a protected characteristic where practicable to do so as set out in the specific policy (Appendix 1). This is the preferred option.

In doing so, we will be contributing to meeting the specific goal set out in the Corporation's Equalities Objectives 2023-2027 to implement the London Care Leaver Compact.

It will also demonstrate our commitment to improving social mobility opportunities for people who are care experienced, and support the wider ambitions to enhance employment and training opportunities for care experienced people in the Square Mile and the CoLC.

- b) For the Community and Children's Services Committee not to approve that the CoLC should treat care experienced as if it were a protected characteristic. This is not the preferred option.

Pursuing option (b) will mean the CoLC is not aligned to the regional and national local government ambitions to improve equal access to opportunities for people who are care experienced.

Proposals

17. To adopt option (a) and treat care experienced as if it were a protected characteristic, as set out in the policy at Appendix 1. In doing so, the CoLC recognises that:

- Care experienced people are a group who, without this protection, are likely to face discrimination as defined by the principles set out in the Equality Act 2010
- Future decisions, services and policies made and adopted by the CoLC should have due regard to the requirements set out in the CoLC 'Care Experienced as a Protected Characteristics' policy.
- In discharging the Public Sector Equality Duty under s.149 of the Equality Act, the Corporation will include care experienced in the annual publication of information relating to people who share a protected characteristic in services and employment and generally have due regard to the need to eliminate discrimination against and promote equality of opportunity for care experienced people.

18. If agreed by Members, the report will go to the Equalities Diversity and Inclusion Sub Committee for information and discussion, and Policy and Resources and the Court of Common Council for approval.

Corporate & Strategic Implications

19. **Financial implications:** Having this status should not impact on the current funding for people who are care experienced. Implementation of the policy would require regular monitoring, with emerging risks presented to Members as required.
20. **Resource implications:** Having this status should not impact on the current funding for people who are care experienced. Implementation of the policy would require regular monitoring of impact in terms of finance and resource, with emerging risks presented to the Community and Children's Services Committee as required.
21. **Legal implications:** The Corporation is entitled to adopt the policy outlined above. Treating care experienced as if it were a Protected Characteristic will not directly bring into play the enforcement mechanisms set out in the Equality Act. However a failure to take into account the policy where it applies or departing from it where it is not reasonable to do so may result in Judicial Review.
22. **Risk implications:** Adopting this policy will reduce the likelihood of care experienced people in CoLC encountering discrimination because of this personal characteristic. It is likely to assist and ensure that there is access to equal opportunities to CoLC care experienced people in terms of education, employment, training and housing needs. The Corporation will be expected to follow the Policy unless there are reasonable and justifiable reasons for not doing so.
23. **Equalities implications:** An individual is protected from discrimination based on a certain characteristic. The Equality Act 2010 sets out the following protected characteristics;
 - Age
 - Disability
 - Gender reassignment
 - Marriage and civil partnership
 - Pregnancy and maternity
 - Race
 - Religion or belief
 - Sex
 - Sexual orientation
24. While acknowledging that the status of care experienced is not currently recognised as a legally binding protected characteristic within the Equality Act 2010, adopting the specific CoLC policy strengthens equal access of opportunity to care experienced people in the City of London. As such, it is a change in approach, not law, whilst adhering to the spirit and principles of the Equality Act 2010..
25. Furthermore, we will be contributing to meeting the goal set out in the Equalities Objectives to implement the London Care Leaver Compact and demonstrating our commitment to improving social mobility opportunities for people who are care experienced. Adopting this policy will also enhance our ongoing commitment as a

corporation to meeting the broader goals and ambitions regarding Equality, Diversity & Inclusion, as set out in our Equalities Objectives 2023–2027.

26. **Climate implications:** There are no known climate implications.

27. **Security implications:** There are no known security implications.

Conclusion

28. This report has set out the background and context to why the CoLC should adopt its own specific policy that recognises care experienced should be treated as a protected characteristic. In doing so, the CoLC will demonstrate its continued commitment to supporting the broader Equality, Diversity & Inclusion agenda, as set out in our Equalities Objectives 2023–2027.

29. The Corporation will be taking a clear regional leadership role in recognising that adopting this policy will provide equal opportunity access to a group of people who would otherwise be discriminated against because of their history of being in care.

30. Adopting the policy will also demonstrate our regional commitment to the Care Leaver Compact, provide a strong foundation for the CoLC to be a leader in developing opportunities for all care experienced people in the Square Mile, and meet our Destination City ambitions.

Appendices

- Appendix 1 – City of London Corporation: Care Experienced as a Protected Characteristic – Policy

Chris Pelham

Assistant Director People Directorate, Community and Children Services

T: 020 7332 1636

E: chris.pelham@cityoflondon.gov.uk

Appendix 1: City of London Corporation

Care Experienced as a Protected Characteristic – Policy

October 2023

Introduction

The City of London Corporation (CoLC) recognises that people who are care experienced may face unique challenges as they transition into independence and adulthood. The CoLC is committed to creating an inclusive and supportive environment for people who have been in the care of the CoLC. This policy reflects our commitment to ensuring that people who have been in the care of the CoLC will not be discriminated against because of their status as a care experienced person.

Definitions

Care experienced: An individual who has been in the care of the CoLC, either foster care, residential care, semi-independent provision, or other similar arrangements, and has since reached the age of 18, and is entitled to support until they are 25 years old.

Objectives

To provide CoLC care experienced people with equal access to education, training employment, and accommodation.

To collaborate with relevant agencies, organisations, and stakeholders to ensure that comprehensive and holistic support is available to CoLC care experienced people.

To create a supportive and inclusive environment that promotes the wellbeing and integration of CoLC care experienced people within the community.

Key Principles

Equal Opportunities: CoLC care experienced people shall have access to the same opportunities and rights as their peers, regardless of their care history.

Tailored Support: Services and support shall be tailored to the individual needs of CoLC care experienced people, recognising their unique circumstances.

Collaboration: The CoLC shall collaborate with educational institutions, employers, housing providers, and other relevant organisations, including the Corporation itself, to ensure that a coordinated and effective support network is available for CoLC care experienced people.

Advocacy: The CoLC shall actively advocate for the rights and needs of CoLC care experienced people within its policies and procedures, including acknowledgement

by all departments of their understanding and commitment to this policy within their corporate parenting responsibility.

Measures and Provisions

Education and Training: The CoLC to provide opportunities for access to scholarships, bursaries, and mentorship programmes to facilitate access to higher education and skill development for CoLC care experienced people. Prioritise care leavers for work experience opportunities, adult education services and ringfenced apprenticeships.

Employment: The CoLC to collaborate with employers (including internally) to offer opportunities to access internships, job training, apprenticeships and, career guidance to CoLC care experienced people.

Housing: The CoLC to prioritise the opportunity for CoLC care experienced people to access affordable housing and support, that ensures an opportunity for a smooth transition to independent living.

Implementation and Monitoring

The CoLC will regularly assess the effectiveness and impact of this policy through data collection, feedback mechanisms, and stakeholder consultations, reporting back to the relevant CoLC committees on the progress of the implementation.

In the delivery of the Public Sector Equality Duty, the CoLC will include care experience in the publication and review of Equality Objectives.

Future decisions, services and policies made and adopted by the CoLC should be assessed through Equality Impact Assessments to determine the impact of changes on people with care experience, alongside those who formally share a protected characteristic.

Committee: Community and Children's Services Committee	Dated: 13/12/2023
Subject: Community Centre Finance (Portsoken and Golden Lane Community Centres)	Public
Which outcomes in the City Corporation's Corporate Plan does this proposal aim to impact directly?	2, 4, 12
Does this proposal require extra revenue and/or capital spending?	Y/N
If so, how much?	£
What is the source of Funding?	
Has this Funding Source been agreed with the Chamberlain's Department?	Y/N
Report of: Executive Director of Community and Children's Services	For Decision
Report authors: Simon Cribbens, Assistant Director – Commissioning and Partnerships (DCCS)	
Liam Gillespie, Head of Housing Management (DCCS)	

Summary

This paper provides Members with an update on the operation of the two community centres at Portsoken and Golden Lane Estate, which are managed by the Housing Division. The centres are managed directly, through operating models supported by Members. However, there are alternative operating models, for example, community-led delivery or outsourcing to a third party, that could be considered. A community-led approach was explored in some detail for the delivery of the Golden Lane Community Centre but was not viable at the time of exploration. The considerations and interdependencies around adopting different models are complex, and likely to take time and additional resource to deliver, and therefore it is recommended that the current arrangements are maintained. Potential grant funding opportunities remain available for groups that may wish to seeking funding to explore and develop alternative business models. However, it is recommended that the Department continues to manage the facilities but will consider any viable alternative options if they arise, bringing these to Members' attention.

Specifically in relation to Golden Lane Community Centre, which is accounted for in the Housing Revenue Account (HRA), the implications of wider community (i.e. non-resident) use have been explored. Wider use places an obligation on the Department to contribute from its local risk budget to the provision of HRA facilities when they are made available for the public. As such, officers will need to identify a Departmental local risk budget to contribute towards operating costs.

Leaseholder contributions to the running costs of Golden Lane Community Centre are also being reconsidered given the use of the centre by the wider community.

Recommendations

Members are asked to:

- Note the report
- Endorse the current operating models for Portsoken and Golden Lane Community Centres and note that officers will consider the viability of any suggested alternative arrangements
- Note the requirement to contribute to Golden Lane Community Centre's costs from a non-HRA budget
- Note that officers will consider in more detail whether leaseholders will continue to be recharged costs relating to GLCC and, if so, how the contribution will be calculated, with a decision to be made before the new financial year

Main Report

Background

1. The Housing Division manages two community centres within the City of London: Golden Lane Estate Community Centre (GLCC) and Portsoken Community Centre.
2. GLCC is integral to the Golden Lane Estate and is therefore managed within the Department's housing function and underwritten by the Housing Revenue Account (HRA). Portsoken Community Centre (PCC) was provided as part of the Canopy by Hilton hotel development at Aldgate and is not a Housing Division asset. The property is leased by the Department from the hotel and its running costs are underwritten by the Department's local risk budget.
3. Both facilities are available for hire by residents and the general public, and the income generated is used to offset running costs. Neither centre is currently profitable, however they produce income which acts to reduce the cost to the City of operating the buildings.

Current and alternative operating models

Current operating models

4. The centres are managed by Housing Division staff. A Community Centres Manager oversees their operation, with help from a Community Centres Assistant. This ensures a staff presence on both sites during operational hours and the staff costs for these posts are split across the two sites.
5. Under this model, the management of the centres, including room bookings, budgets, income generation and facilities management is the responsibility of the Housing Division.
6. For PCC, Members set a vision for a thriving and financially sustainable facility, serving and driven by people living and working in the community. No operating

budget was provided for the centre, so it must either cover its costs through income generation or the deficit be absorbed by the Department.

7. Similarly, with GLCC, Members endorsed the model of a centre run in the interests of the residents and wider community, with the input of those living on the estate and others using the centre.
8. Both centres have Advisory Boards made up of local stakeholders, including Members, residents and City Corporation officers, which act as community consultative groups and help set policy for the centres, including reviewing hiring charges and balancing types of use in the spaces.
9. Both PCC and GLCC operate on a 'zero budget' principle; they are accounted for in the City Fund and HRA respectively, with income offsetting running costs. Remaining costs are charged to the relevant local risk budgets. In the case of GLCC, an element of the running costs is charged to leaseholders of Golden Lane Estate.
10. The centres are both well used, with a variety of commissioned services, commercial users, community-focused initiatives, and resident hirers making use of the space.
11. PCC averages 530 hours of bookings per month (constituting approximately 55% of the available time), with 510 hours on average at GLCC (approximately 63% of usable time being booked). The under-utilised hours tend to be at times when demand for hire is low, for instance early mornings, or during school holidays. Peak times are weekday evenings and, for commissioned services, weekday afternoons and evenings. These slots tend to be consistently booked by hirers.
12. It should be noted that the two centres operate in areas where they compete with other community spaces, including the City's own libraries, church-based spaces and venues such as St. Luke's Community Centre.
13. A scheme of different hiring charges is operated, from free resident/community use up to full commercial hire rates. Officers balance the use of the centres to ensure that one type of hire does not dominate and free or reduced-cost use, which benefits the local community, is enabled. Officers are assisted in monitoring this balance by the respective Advisory Boards. Currently, approximately 25% of the use at each site is for free community or resident hire. The centres are moving towards the goal of standalone financial viability, however the need to generate income must be balanced with enabling resident use and playing an important role in supporting wider delivery of Department-sponsored activity (e.g., adult skills, youth club provision and community events).

Alternative operating models

14. Officers have been asked to consider alternative operating models for both PCC and GLCC at various times, including the potential running of the centres by community-led groups.

15. In the case of GLCC, this was considered in detail several years ago, when a group led by residents of Golden Lane Estate expressed an interest in taking over the running of GLCC after its refurbishment. This group was successful in obtaining funding for a feasibility study to examine the potential for a community-led model, however this did not result in a viable proposal being presented at the time, principally due to the lack of firm data on running costs, being so soon after the centre's reopening.
16. The outsourcing of the centres to community-led groups would require sufficient assurance to be given about the management of financial and other risks (asset management, safeguarding, health and safety, etc.) involved in doing so. Operating costs such as utilities, business rates and rent/service charges are significant and the business case for a community-led model for either location would need to give adequate assurance of the financial viability of the proposal, and not rely on the City Corporation effectively underwriting the risk should the venture not prove workable.
17. The City Corporation would also have to factor in its duties to the HRA and legal considerations around the proper management of housing assets (in the case of GLCC). A further factor is that PCC is held pursuant to a lease, which may complicate, or potentially prohibit, the transfer of operational management to a third party.
18. When considering the model for the two centres prior to their opening, Members supported the approach that the centres would be run by the Department along their current lines, to establish stability and long-term feasibility. This was intended to allow other possible arrangements to be suggested, including those led by the community, which could be informed by a more realistic view of how the centre operates.
19. An initial step for an alternative model could be the establishment of an organisation to develop the capacity to deliver services, or manage the centre, like the approach taken initially at GLCC. Community-led models for this type of facility do exist elsewhere, however they tend to be supported by much larger resident bases and involve well-established entities with a track record of similar operations. The running of community facilities can also be outsourced to provider organisations, however this may not deliver any substantial benefits in financial or community involvement terms.
20. Members should note that there is currently no identified Departmental funding to support this capacity-building by any interested group and, if a group came forward and it was considered desirable to explore the potential of any model, suitable funding would need to be found either by the Department or the group itself.
21. Given the above considerations, Members are asked to endorse the current operating models, though officers will consider any suggested alternatives and bring viable alternatives to Members for their consideration.

Financing of Golden Lane Estate Community Centre (GLCC)

General financial arrangements

22. GLCC forms part of the City Corporation's housing estate portfolio. The housing estates and related buildings and amenities are financed through the Housing Revenue Account (HRA). This includes facilities such as community centres; income and expenditure for GLCC is therefore currently managed through this account.
23. Leases for residential properties on Golden Lane, which have been sold through the Right to Buy, provide that the City Corporation may apportion part of the costs of the provision of its housing and other services relating to the estates. Therefore, after income has been applied to the account, the remaining running costs of GLCC are covered by the HRA, with a proportion billed to leaseholders through their service charges. The proportion paid by leaseholders is determined by the percentages contained in individual leases.
24. In 2022/23, £83,529 in income was generated at GLCC and the operating costs amounted to £126,719, leaving a deficit of £43k. Of this, £10,561 was recharged to leaseholders on the estate, which is the lowest amount passed on to leaseholders for several years. Members may wish to note that no service charge contribution was demanded in 2020/21 as the centre was closed during the pandemic.

Resident and wider community use of GLCC

25. GLCC was substantially refurbished in 2017/18. Prior to that, it had been used almost exclusively by residents living on the estate. The financing of the centre through the HRA and service charge contributions was therefore both a logical and fair arrangement.
26. Since the refurbishment of the centre, use by the wider community has grown and now makes up a significant amount of the activity taking place at the centre. Approximately 75% of bookings are made by non-resident hirers (whether individuals or organisations), however it should be noted that many of these activities will be open to residents, or specifically aimed towards them (including commissioned services). The remaining c.25% of bookings are made by residents on the estate.
27. It can therefore be questioned whether it is fair to continue to finance the running of the centre through the traditional means (i.e., via the HRA and service charge contributions).
28. Bearing in mind the implications for management of the HRA, officers obtained advice on the current model and potential different approaches, with a view to agreeing as fair and transparent an approach as possible for the HRA and leaseholders.

Advice on the implications for the management of the HRA

29. Legal advice was sought on the current operating model and its implications for the maintenance of the HRA, given the changed nature of the use of GLCC following its refurbishment. Officers requested an opinion on whether the HRA was the correct account through which to administer the running costs of the centre, and what the implications were for the current operating model on the practice of charging back an element of the costs to leaseholders on Golden Lane.
30. Officers were advised that wider community use of HRA facilities places an obligation on the Department to contribute to the cost of providing such facilities from non-HRA money. The non-HRA contribution should be a reasonable reflection of the wider community's benefit from the facilities.
31. Officers were also advised that the HRA was still the correct fund through which to account for GLCC's running costs and that a contribution may still be sought from leaseholders on the estate, however there is no obligation to do so.
32. The Department must therefore consider apportioning the operating costs of GLCC between the HRA and a suitable Departmental local risk budget. Members may wish to note that there is currently no identified local risk budget to cover such costs, however officers will work with the Chamberlain's Department to identify a suitable budget and implement this formally by the next financial year.
33. It should be noted that a contribution is already made to the centre from non-HRA funds. The City Corporation's Adult Skills and Education Service (ASES) is a major user of the centre and pays £28,000 per annum for use of various rooms and facilities. This amount was agreed at the time of GLCC's reopening in 2018 and was set with reference to the Business Rates payable on their former premises at the Sir Richard Cloudesley School site. At the time, it roughly equated to their expected demand for bookable time within the centre. This income is of course contingent on ASES's continued use of the centre, which is not subject to any time commitment on their part.

Implications for long leaseholders

34. The relevant clause in the lease agreements for properties on Golden Lane Estate says that the City Corporation *may* charge a proportion of the costs for estate facilities including GLCC. Under the old operating model (before refurbishment), it was clearly arguable that costs should be apportioned through leases as the facilities were provided almost exclusively for the benefit of residents on the estate.
35. Given the changed nature of the use of GLCC, we are required not only to identify a contribution from non-HRA funds but to consider what, if anything, should be charged to long leaseholders through service charge provisions.

36. Officers suggest that two options are reasonably open to the Department in respect of leaseholder contributions:

- i. Continue to charge a proportion of the costs for GLCC to leaseholders but limit this recharge to the relevant part of the costs directly attributable to resident use (quantified through analysis of previous year's bookings)
- ii. Do not charge anything back to leaseholders (costs attributable to resident use to be borne solely by the HRA)

37. Officers will consider the financial implications of these options in more detail. Consideration must also be given to our duties towards the HRA and the need to recover costs wherever possible. Any decision to reduce or remove service charge contributions would of course underline the need for GLCC to generate as much income as possible.

Proposals

38. Members are asked to note the report, and:

Operating models

- i. Endorse the current approach to the operation of both community centres, with officers committing to bringing potential alternatives to Members' attention and engaging with any community groups expressing an interest in developing an alternative proposal

Operation and financing of GLCC

- ii. Note that GLCC will continue to be accounted for within the HRA, with a contribution from a Departmental local risk budget, to reflect the wider community's share of the benefits and amenities of GLCC, the precise arrangements being subject to discussion with the Chamberlain's Department

Leaseholder contributions

- iii. Note that officers will consider in more detail whether leaseholders will continue to be recharged costs relating to GLCC and, if so, how the contribution will be calculated, with a decision to be made before the new financial year

Corporate & Strategic Implications

Strategic implications

The community centre provision supports our strategic aims of 'contributing to a flourishing society' (people enjoy good health and wellbeing, people have equal opportunities to enrich their lives and reach their full potential, communities are cohesive and have the facilities

they need) and 'shaping outstanding environments' (Our spaces are secure resilient and well maintained).

Financial implications

The main financial implication is the need to identify an appropriate local risk budget to contribute to the running of GLCC. This will be subject to further discussion with officer in DCCS and Chamberlain's.

Officers will also consider the financial implications of limiting or removing the leaseholder contribution to GLCC in more detail and arrive at a decision.

Resource implications

None.

Legal implications

The reconsideration of financial arrangements in respect of GLCC will support greater transparency in our management of the HRA and our duties in respect of that account.

Risk implications

None.

Equalities Implications

None.

Climate implications

None.

Security implications

None.

Conclusion

39. The Housing Division manages two community centres within the City, at Portsoken and Golden Lane Estate. These are run in-house in accordance with models endorsed by Members. Officers have been asked to consider alternative operating models for both PCC and GLCC at various times, including the potential running of the centres by community-led groups and, in the case of GLCC a community group conducted a feasibility study on a proposal by a resident group, though this did not result in a viable plan at the time it was explored (now several years ago).
40. Officers recommend that the current operating models continue and will give due consideration to potential alternatives.
41. The arrangements for financing GLCC through the HRA have been confirmed as the most appropriate arrangement, given that it is a Housing asset. However, a contribution from a non-HRA local risk budget will need to be made in recognition of the centre's use by the wider community.
42. The cost of running GLCC is also partly covered by leaseholder service charges. Given the changed nature of the use of the centre, officers will

consider whether the service charge will continue to be made and, if so, limit it to a proportion of the use directly attributable to residents.

Appendices

- None

Simon Cribbens

Assistant Director, Partnerships and Commissioning, DCCS

T: 020 7332 1638

E: simon.cribbens@cityoflondon.gov.uk

Liam Gillespie

Head of Housing Management, DCCS

T: 020 7332 3785

E: liam.gillespie@cityoflondon.gov.uk

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Committee: Community and Children's Services	Dated: 13/12/2023
Subject: Community Patrolling Service – variation of contract	Public
Which outcomes in the City Corporation's Corporate Plan does this proposal aim to impact directly?	1, 12
Does this proposal require extra revenue and/or capital spending?	N
If so, how much?	£
What is the source of Funding?	
Has this Funding Source been agreed with the Chamberlain's Department?	n/a
Report of: Judith Finlay, Executive Director, Department of Community and Children's Services	For Discussion
Report author: Simon Cribbens, Assistant Director – Commissioning and Partnerships	

Summary

This report informs Members of the variation of the Community Patrolling Service contract to deliver Home Office funded activity on the City's bridges. Variation of the Department's contract allows for the rapid mobilisation of an expanded service in line with the conditions of the grant. The expanded service supports City Operations and the City of London Police. It should be noted that the Police Authority Board are separately asked to endorse the delegation of Community Safety Accreditation Scheme (CSAS) powers to the provider. Such powers support community safety patrolling, but the expanded delivery is not contingent on them.

Recommendations

Members are asked to:

- Note the report.

Main Report

Background

1. The Department of Community and Children's services commissions a Community Patrolling Service, delivered under contract the provider Parkguard, to address specific issues.
2. The scope of the contract is limited to two discrete areas:
 - a. Resident reassurance – which provides some targeted patrolling and response on the City's social housing estates within the Square Mile
 - b. Outreach support – supporting delivery of outreach services for street homelessness people, and to deliver patrols reducing begging.

3. The resident reassurance patrols is funded by the Housing budget and operates on the City's social housing estates. Tasking is informed by intelligence gathered by housing colleagues. Deployment is based on intelligence and arising need rather than scheduled patrolling. All information and intelligence gathered by Parkguard is shared with police sector team each week. For anything that requires urgent attention Parkguard will call the police. The scale of delivery is limited by the amount of budget made available but is broadly considered proportionate to need.
4. Outreach support provides assistance to the delivery of outreach services for street homelessness people, and to deliver patrols minimising begging. It aims to help reduce anti-social behaviour which may be associated with begging, and to enable the outreach services to work with the most vulnerable. This includes facilitating effective outreach working by homelessness services in challenging situations and locations.

Current Position

5. The Police Authority Board team led a bid to the Home Office's Safer Streets Fund. The fund supports local authority initiatives to prevent crime, and the City of London bid included additional CCTV, lighting and an expansion of community safety patrolling to the City's bridges (in partnership with Southwark and Lambeth).
6. The bid was successful and provides funding for additional activity in 2023/24 and 2024/25. Grant conditions expect the rapid mobilisation of delivery.
7. To enable the rapid mobilisation of this additional delivery, the current Departmental contract with Parkguard has been varied within the permitted limits. The variation increases the contract value by £100k (fully funded by the Safer Streets Fund grant). The variation was approved the Community and Children's Services Category Board in line with the delegations of the procurement code.
8. While the contract is held by the department, delivery focuses predominantly on areas and issues that are the concern of City Operations and the City of London Police. Tasking and oversight will be provided by a multi-agency panel, including the Department's Community Safety Team.
9. The patrolling will also engage with relevant initiatives such as the suicide prevention approaches on the bridges.
10. The current provider Parkguard does not operate in the City using Community Safety Accreditation Scheme (CSAS) powers. The CSAS powers, introduced in 2002, allows Chief Constables to delegate some limited powers to accredited local officers such as neighbourhood wardens or security staff. This includes powers to request a person's name and address (where they have committed an offence or are acting in an anti-social manner), confiscate alcohol in some circumstances and to stop cyclists riding on the footpath.

11. The powers are delegated by the Commissioner of the City of London Police. A report to the Police Authority Board (13 December 2023) seeks endorsement of the delegation. This report is provided with the “for information” items. The expanded provision funded by the Safer Streets Fund is not contingent on the use of such powers, but they are considered beneficial to its operation

Corporate & Strategic Implications

Strategic implications

12. The service aligns with and supports the delivery of the Corporate Plan, the Safer City Partnership Strategy, the Department’s business plan.

Financial implications

13. As set within the report – the expansion is fully funded by Home Office Grant

Resource implications

14. None.

Legal implications

15. The variation of contract has been reviewed by the Comptroller and City Solicitor and is compliant.

Risk implications

16. None.

Equalities implications

17. The provider is required to ensure that the provision of the service meets the needs of service users from different religious, ethnic and cultural backgrounds including paying due regard to specific needs that may relate to gender, sexual orientation, disability, age, and transgendered status. 26.4. The provider will monitor activities and outcomes so as to identify and address any gaps in its delivery to any of the protected groups within the Equalities Act 2010.

Climate implications

18. None.

Security implications

19. Delivery aims to prevent crime and anti-social behaviour.

Conclusion

20. The expanded delivery of community reassurance patrolling will

Appendices

- None

Simon Cribbens

Assistant Director – Commissioning and Partnerships

E: simon.cribbens@cityoflondon.gov.uk

Committee: Police Authority Board – For Decision Community and Children’s Services – For Information	Dated: 13/12/2023 13/12/2023
Subject: Roles and powers of community safety and constabulary services in the City	Public
Which outcomes in the City Corporation’s Corporate Plan does this proposal aim to impact directly?	#1 – People are safe and feel safe
Does this proposal require extra revenue and/or capital spending?	N
If so, how much?	N/A
What is the source of Funding?	N/A
Has this Funding Source been agreed with the Chamberlain’s Department?	N/A
Report of: Town Clerk	For Decision For Information (CCS)
Report author: Charles Smart, Police Authority team	

Summary

This report brings together three issues raised at PAB over the course of 2023 which relate to the roles of, and the powers available to, several “policing-adjacent” organisations in the City:

- a) An overview of the City Corporation’s various constabularies – the Hampsted Heath Constabulary, Epping Forest Keepers, and City of London Market Constabularies
- b) A review of the City’s crime and disorder byelaws
- c) A decision on the delegation of Community Safety Accreditation Scheme (CSAS) powers to the City’s community safety patrol provider, Parkguard

These are treated together for two reasons – there is a shared question across ‘a’ and ‘c’ about potential risks posed by ‘policing-adjacent’ organisations exercising enforcement powers where they may be confused with the police, and across ‘b’ and ‘c’ about which available powers are best employed to reduce crime and disorder (i.e. “byelaws and/or CSAS?”).

On the former question, this report identifies a risk of potential confusion between the City Police and the Hampstead Heath Constabulary, which might suggest that the appearance, and oversight, of the Constabulary should be reviewed. On the latter this report recommends the delegation of CSAS powers, both on its own merits and because successive legislation now means City byelaws are now of limited relevance to crime and disorder.

Recommendations

Members are asked to:

- Note the information provided on City constabularies and byelaws
- Consider whether to recommend to the Hampstead Heath Committee that a review into the oversight arrangements for the Hampstead Heath Constabulary, and the form of the Constabulary uniform, be carried out, checking these are proportionate to their 'policing-adjacent' responsibilities
- Endorse the recommendation to delegate CSAS powers to the City Corporation's commissioned community safety patrol service (currently provided by Parkguard)

Main Report

Background

1. Over the course of 2023 PAB Members have raised three inter-linked issues:
 - a) *'Policing-adjacent' organisations* – Members were made aware of the Hampstead Heath Constabulary and requested further background on their role, powers, and oversight arrangements, asked if similar organisations existed within the Corporation, and for an assessment of this state of affairs.
 - b) *City byelaws* – Members requested a review of the City's bylaws, specifically whether their greater use might represent an opportunity to address low-level crime and disorder.
 - c) *Community safety patrol (Parkguard) CSAS powers* – Members received a paper in September about delegating CSAS powers to Parkguard, which was withdrawn with a request for more information on issues including oversight and their use of powers.
2. These three issues have common themes about which organisations have policing and enforcement powers in the City (/ Corporation), how their various work is overseen, and the merits and risks of extending or amending who is able to use which powers. As such, they are treated together in this report.

Current Position

Policing-adjacent organisations

3. Corporation officers have reviewed these organisations and a summary of their backgrounds, operations and powers, oversight, and appearances is included at *Appendix A*.
4. In brief, there are three constabularies overseen by the City Corporation:

- The Hampstead Heath Constabulary patrols the Heath, Highgate Wood, and Queen’s Park in Kilburn. Their 5 attested constables enforce Heath-specific and general “open spaces” byelaws in these areas, and have the power of arrest although this is used very rarely. They are accountable to the Assistant Director of North London Open Spaces, and have a uniform very similar to that of the City Police, including the red-white check detail.
 - Epping Forest Rangers (16 keepers, 4 enforcement officers, 2 managers) likewise enforce bespoke and general byelaws in the Forest, for example to protect its deer or prevent littering. They also have the power of arrest, also used very rarely. They are accountable to the Environment Director, and wear khaki uniforms that do not resemble police clothing.
 - The City of London Markets Constabularies (c. 45 personnel total) provide security in Smithfield, Billingsgate, and New Spitalfields markets. They do not have power of arrest. They are overseen by the Markets Director, and have uniforms similar to generic security guards (though with City red-white check detail).
5. Of these three, only the Markets Constabularies operate (partially) in the same geographic area as the City Police – i.e. within the City’s Smithfield markets complex. There are other uniformed officers with enforcement powers in the City – such as traffic, port health, Trading Standards officers – but these would not be considered policing-type or policing-adjacent. Parkguard, the City’s community patrol service, works in partnership with the City Police but at present has no enforcement powers (discussed further below).
 6. The conclusion of this overview is that oversight and accountability mechanisms are in place for all the City’s constabularies and, in practice, there are few overlaps with the City Police because the constabularies operate in distinct and separate areas and (operationally and physically) two of the three do not ‘look like’ police officers.
 7. An area potentially meriting further investigation is oversight of the Heath Constabulary, whose uniforms are most similar to City Police and where there may be risk of public confusion, including because the Heath Constabulary do have power of arrest. Oversight of the Heath Constabulary is the responsibility of the Hampstead Heath, Highgate Wood and Queen’s Park Committee. Members may wish to consider whether to recommend to that Committee that a brief review of those oversight arrangements – and the Constabulary’s uniform - is carried out, to assess whether these are appropriate for the role of the Constabulary, proportionate to their powers and responsibilities, and to considerations of public perception.

City byelaws

8. The City of London, like other local authorities, can implement byelaws to regulate and manage the use of City public spaces and these are (as above) used actively for Corporation-managed areas outside the Square Mile such as Hampstead Heath. The Police Authority Board commissioned Corporation

officers to review the byelaws available for tackling crime and disorder in the Square Mile, whether they are being used, and if this could be improved or change (potentially as an alternative or complement to delegating CSAS powers).

9. The conclusion of this review is that City byelaws now have limited practical application to tackling local crime and disorder. This is because these byelaws are largely historic, some dating back to 1898, and have since been superseded by other more appropriate statutory powers. As a result they are rarely if ever used, and in the majority of City public spaces the City Police and Corporation enforcement officers (such as street environment officers) enforce offences using powers derived from the Highways Act, the Road Traffic Regulation Act (traffic orders), the Environmental Protection Act, and criminal offences under the Highway Code. It is, for example, already an offence under the Highway Code to cycle on a pavement.
10. The only areas where this review concludes that existing City byelaws remain a viable enforcement 'tool' for crime and disorder are on City walkways, much the largest of which is the Barbican highwalk (others include the Riverside Walkway, the footway through Baynard House near Blackfriars and the Fyefoot Lane footway across Upper Thames St.). City Walkway byelaws derive from the City of London Various Powers Act 1967 and prescribe a specific set of offences such as bringing a vehicle onto the Walkway, skateboarding, playing music, dog walking without a lead and littering (see *Appendix 3*), but also require such offences to be dealt with by summary conviction to a fine not exceeding £20. That means only police officers can enforce City byelaws meaning enforcement is dependent on a policing presence.
11. City byelaws can be amended or extended to address specific issues on walkways or in public spaces not covered by existing statutory powers. For walkways, the enforcement powers and level of fine could also be reviewed but this may require the current byelaws to be revoked before new ones are brought in. Since the byelaws were created through primary legislation, the mechanism to change them also requires the approval of the Secretary of State (as a minimum) based on evidence to demonstrate the extent of the existing problem, the justification as to why that problem cannot be addressed through existing powers, consultation with external stakeholders and the support of the Court of Common Council.
12. As part of this process it would need to be demonstrated that any new provisions were justified, proportionate and reasonable. Such changes are uncommon – the last (to allow Civil Enforcement Officers to enforce vehicle parking) was made through a wider 'various City powers' piece of legislation in 2013. This means amending byelaws is unlikely to be the fastest or most proportionate (in terms of resources involved) means of addressing a given disorder issue.

Delegation of CSAS powers to the Corporation's community safety patrol service (Parkguard)

13. In September, PAB received a paper about delegating CSAS powers to the Corporation's community safety patrol service, Parkguard. In summary: Parkguard currently deliver patrols on City-run residential estates and support the Corporation's homelessness outreach service. They have no enforcement powers (including enforcement of byelaws) and their main functions are providing reassurance and deterring crime through a visible presence, collecting intelligence, and communicating issues to the City Police.
14. The aim of delegating CSAS powers is to give Parkguard officers more tools to deal with low-level disorder and ASB – the recommendation is to delegate powers to issue Fixed Penalty Notices (as a credible enforcement tool, although in practice used infrequently elsewhere), to require a name and address, to require the surrender of alcohol and tobacco, and to stop cycles riding on a footway. Full details on the proposals are available in the September paper (see *Background papers* section).
15. In response Members raised several questions, which are addressed below:
 - *The process for extending Parkguard's contract* – This is a separate issue to CSAS delegation. Parkguard's existing contract (held by Dept. Communities & Childrens Services) for patrolling social housing estates and supporting homelessness outreach was extended in July, prior to the September PAB meeting. Its value was within officer delegations and followed all internal clearance processes. Since September, the Corporation has been awarded grant funding from the Home Office to temporarily expand community safety patrolling, as part of a wider multi-borough bid to tackle crime on bridges. This expansion is also within officer delegations for approval by the relevant Category Board and is reported to relevant Members.
 - *A 'make or buy' analysis of Parkguard's services* – Members queried if funding could be better invested in the City Police. At present, this is not a live question – CSAS delegation carries no cost, the current contract is funded by DCCS budgets, and the temporary expansion is funded from a Home Office Safer Streets Fund grant that cannot be used for core policing services. A theoretical scenario involving a choice between Parkguard and City Police would depend on the objectives (with Parkguard being a service for lower-level crime and disorder), but in like-for-like personnel terms Parkguard is cheaper, more flexible, and faster to (de)mobilise than City Police officers.
 - *Powers available to Parkguard, including use of handcuffs* – At present, without CSAS powers, Parkguard officers operating in the City are in terms of powers no different to members of the public. Delegating CSAS powers would give them the powers listed at paragraph 13, but no more – they are not able to enforce byelaws and would not have powers of arrest or search. Parkguard officers do carry handcuffs but can use them only as could any member of the public – as a restraint in self-defence or as the least intrusive use of force. In practice their use of handcuffs (in the City and in other areas in which they

operate) is exceptionally rare, and subject to automatic 'trigger codes' with incident reports sent to Parkguard's senior managers and supervisors.

- *Oversight of the use of CSAS powers* – It is recommended that delegation of CSAS powers is accompanied by greater oversight and scrutiny of Parkguard, linked also to the Home-Office funded expansion. This will entail: fortnightly working-level reporting to the multi-agency 'bridge crime' tasking group (comprising Corporation officials, City Police, other borough representatives, and the Safer Business Network) , quarterly reporting on use of CSAS powers to the Corporation, and quarterly reporting on both use of powers and wider operational activity to PAB and CSS committees. There is, as above, also pre-existing internal scrutiny of use of powers and all complaints are automatically sent to the Corporation for review. Lastly, the recommendation is for a *trial* of CSAS powers, to be evaluated in detail (with a report to Members) after one year.

16. Members should lastly be aware that Parkguard has, since July 2023, been delivering community safety patrols on Hampstead Heath in support of the Hampstead Heath Constabulary (under a separate contract to the one that funds patrols in the Square Mile). They are able to use CSAS powers on the Heath (which is under Metropolitan Police jurisdiction, within which Parkguard have held CSAS delegation since 2013). This is overseen (and approved by) the Hampstead Heath Committee, which by the time of December PAB, will have considered a report on their activities on the Heath to date, including data on their use of CSAS powers (the paper at item 8 on the agenda of the Heath Committee's meeting on 29 November refers).

Options

17. For the City's constabularies, there is an option to do a deeper review of governance, oversight, and operational coordination. This is outside of PAB's remit and at this stage there isn't a clear rationale from a policing perspective to go beyond examining the Heath Constabulary's oversight.
18. For byelaws, it is likely to be challenging to make a case to the Secretary of State for new byelaws on public highways that would be additional to existing primary national legislation. A case for amending and updating the byelaws relating to City walkways is potentially more likely to be successful but a decision to progress such a review would need to take into account the evidence base, the consultation required and the resources, cost & timescale involved. If Parkguard is granted CSAS powers then the possible review of the City Walkway bylaws could include a proposal for them to be able to enforce the bylaws in addition to the police. At this stage, however, Corporation officers do not believe there is a sufficiently strong case to commence such a review.
19. For CSAS, the lead alternatives are not to delegate any powers, or not to delegate the power to issue Fixed Penalty Notices (which is the only power that involves any form of punishment). Parkguard patrols will still be temporarily expanded regardless of the decision on CSAS, though the view of City Police and

Corporation officers is that this will limit their effectiveness in tackling crime and disorder as they will lack a credible sanction and substantive powers to intervene in, for example, instances of dangerous cycling or drinking in prohibited places. As above, Fixed Penalty Notices are used rarely in practice by Parkguard in other areas so there is limited upside risk in delegating this power, the downside risk of not doing so is the lack of a credible threat. Anecdotal evidence from other policing areas is that this is a useful tool for Parkguard / community safety patrols to have.

Proposals

20. This report recommends:

- A) That PAB considers whether to recommend to the Heath Committee that it should review the Heath Constabulary's oversight and uniform
- B) That PAB agrees to delegate CSAS powers to the City's community safety patrol (currently Parkguard) to give them more tools to tackle crime and disorder, with additional oversight
- C) That PAB notes the other conclusions of this report – that there are few other overlaps between City constabularies and policing, and that byelaws do not appear to offer a useful suite of tools for tackling crime and disorder in the Square Mile

Conclusion

21. This report has sought to answer two questions common to three issues – are there risks from the current (constabulary) or future (Parkguard) exercise of powers by “policing adjacent” organisations, and are there opportunities to use current (byelaw) or future (CSAS) powers to better effect to reduce crime and disorder.

22. On the first, it concludes that City constabularies and City Police are largely distinct (and differentiable), though with a question about the Heath Constabulary. On the second, it discounts the practical utility of City byelaws. In turn, it instead recommends delegating CSAS powers to Parkguard as a way to enhance their work to reduce crime and disorder, and that this should be accompanied by greater oversight and scrutiny (to balance the potential risks of giving a “policing adjacent” service some enforcement powers).

Appendices

- Appendix 1 – Detail of City Constabularies
- Appendix 2 – City Walkway Byelaws
- Appendix 3 – 2023 Letter from City of London Police Commissioner endorsing delegation of CSAS powers to Parkguard

Background Papers

Community Safety Patrolling and Delegation of Community Safety Accreditation Scheme powers – *September PAB paper* – Available [here](#)

Charles Smart

Policy Officer, Police Authority

T: n/a

E: Charles.smart@cityoflondon.gov.uk

Organisation	Background and legislative basis	Size, powers, and tasking	Oversight, accountability, and funding	Appearance, and relation to other police
Hampstead Heath Constabulary	<p>Originally part of the LCC Parks Authority (est. 1889), transferred to the Corporation along with Heath ownership in 1992.</p> <p>HHC are sworn as constables under Ministry of Housing and Local Government Provisional Order Confirmation (Greater London Parks and Open Spaces) Act 1967.</p>	<p>5 attested constables (recently reduced from team of 12), plans to recruit additional rangers who will not be constables.</p> <p>Powers to enforce Heath and open spaces bylaws and regulations, though mainly reporting and taking of names and addresses of offenders – power of arrest is used very rarely.</p> <p>Tasked and controlled by themselves.</p>	<p>Accountable to the Asst. Director of North London Open Spaces, no formal reporting requirements, though ad-hoc reports produced for Hampstead Heath, Highgate Wood and Queen’s Park C’ttee.</p> <p>Complaints handled by Corporation, via Environment dept. Not inspected by HMICFRS, and there is no relationship to the IOPC, as they are Corporation/council officers.</p> <p>Funded from City Cash (Hampstead Heath ‘local risk’ budget)</p>	<p>Uniform very similar to City of London Police, including red-white check detail. Link. Vehicles are in police colours with City of London logo.</p> <p>Work with Met Police, to whom any serious crimes are passed. Parkguard have been contracted to support the HHC, on the Heath.</p>
Epping Forest Keepers	<p>Established under the Epping Forest Acts 1878 and 1880 which formally transferred the forest to the Corporation.</p> <p>Keepers are sworn as constables under these Acts.</p>	<p>16 keepers and assistant keepers, 2 managers, 4 enforcement officers.</p> <p>Power to enforce Epping Forest bylaws (e.g. cycling, horse-riding, protecting deer) and LA bylaws on litter and dogs. Power to arrest, but used rarely. Can bring prosecutions in Magistrates and Crown courts.</p> <p>Tasked and controlled by the Head of Operations (Head Keeper).</p>	<p>Overseen by, and accountable to, the Corporation’s Executive Director of Environment and the Epping Forest and Commons C’ttee, to whom they report bimonthly.</p> <p>Current legal view (from 2012) is Keepers are not answerable to the IOPC, and complaints are handled by the Corporation. Not inspected by HMICFRS.</p> <p>Funded by Epping Forest Charity, which in turn is 50% funded by City Cash and 50% funded by locally-generated income.</p>	<p>Uniform is khaki, not police-like. Vehicles are in police colours but with black bonnets. Link</p> <p>Keepers work with Essex & Met police, regularly attend tasking and briefing meetings, and have information sharing agreements.</p> <p>Occasional work with Border Force, water bailiffs, LA ASB officers.</p>
CoL Markets Constabularies	<p>No bespoke legislation – operate under the Local Government Miscellaneous Provisions Act 1982</p>	<p>1 general manager, 3 heads of security (1 for each market), 7 sergeants, 37 constables, 1 security administrator</p> <p>Power to enforce LG Misc. Provisions (e.g. around fire precautions) and Smithfield team have limited</p>	<p>Overseen by Markets Director, though ultimately report to Corporation’s Chief Operating Officer (Emma Moore)</p>	<p>Uniform like generic security guard, though with CoLP red-white check detail. Link. Vehicles are white and clearly branded as ‘constabulary’ not police. link</p>

		<p>added powers under local authority status (e.g. no smoking, no fly tipping)</p> <p>Tasked, ultimately, by the General Manager (at Billingsgate, who is responsible for all 3 markets' security)</p>	<p>No public reporting requirements, and no current professional standards although SIA accreditation is about to be rolled out</p> <p>Funded by market service charges – i.e. market tenants fund them as security</p>	<p>Work with police mainly around protests and threats, and with CTSA. Criminal incidents and immigration cases (in vehicles) are reported to local forces (CoLP, Tower Hamlets, Waltham Forest).</p>
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Appendix 2 – City Walkway Byelaws



CORPORATION OF LONDON

BYELAWS made under Section 12 of the City of London (Various Powers) Act 1967, by The Mayor and Commonalty and Citizens of the City of London, acting by the Common Council, with respect to City Walkways.

1. In these Byelaws—

“the Corporation” means the Mayor and Commonalty and Citizens of the City of London, acting by the Common Council;

“Act of 1967” means the City of London (Various Powers) Act 1967;

“Act of 1969” means the City of London (Various Powers) Act 1969;

“balustrade” means any balustrade, wall, railing or fence comprised in or adjoining any City Walkway;

“City Walkway” means a place within the City of London declared to be a City Walkway by the Corporation in pursuance of Section 6 of the Act of 1967;

“invalid carriage” means a mechanically propelled vehicle, the weight of which, unladen, does not exceed five hundredweight and which is specially designed and constructed, and not merely adapted, for the use of a person suffering from some physical defect or disability and is used solely by such a person;

“vehicle” means a car, van, lorry, caravan, truck, motorcycle, cycle or any other vehicle whether mechanically propelled or not, but it does not include a perambulator, invalid chair or invalid carriage.

2. Any act necessary for the proper execution of his duty by (1) an officer of the Corporation, (2) a Police Constable, (3) a Fire Officer, (4) an Ambulance Officer, or (5) any person, or the servant of any person, employed, engaged or appointed by the Corporation or any statutory undertaker for the purpose of carrying out any of their functions, or any act done with the consent of a Police Constable in uniform, shall not be deemed an offence against these Byelaws.

3. Any act required to be carried out by any person in or upon a City Walkway in pursuance of a statutory requirement or notice served by the Corporation under such a requirement, shall not be deemed an offence against these Byelaws.

4. Any act carried out by any person in or upon a City Walkway with the written consent of the Corporation given in pursuance of Section 18 of the Act of 1967 as amended by Section 14 of the Act of 1969, shall not be deemed an offence against these Byelaws.

5. No person shall, when on a City Walkway—
 - (1) place or cause to be placed any article or substance on any balustrade;
 - (2) wilfully throw or drop, or cause to be thrown or dropped, upon or from that City Walkway, any article or substance;
 - (3) climb or sit on any balustrade;
 - (4) bring or cause to be brought any dog which is not on a lead and kept under effective control;
 - (5) allow any dog under his control or ownership to foul any part thereof by depositing its excrement thereon — Provided that a person shall not be liable to be convicted of an offence against this Byelaw if the fouling of the City Walkway by the dog was not due to culpable neglect or default of that person;
 - (6) play any instrument of music;
 - (7) use or operate any radio, record or cassette player or other similar instrument;
 - (8) bring or cause to be brought any vehicle;
 - (9) ride or cause to be ridden any horse or other animal;
 - (10) bring or cause to be brought any horse, pony, mule, ass, goat or cattle;
 - (11) importune any person for the purpose of taking or selling any photograph;
 - (12) set up any structure or erection;
 - (13) climb on any tree;
 - (14) enter or walk on parts thereof where entry or walking is for the time being prohibited by exhibited notices authorized by the Corporation;
 - (15) interfere with or obstruct any officer of the Corporation in the execution of his duty.

6. Every person who shall offend against any of the foregoing Byelaws shall be liable upon summary conviction for any such offence to a fine not exceeding £20.

Examined,
(Signed) DESMOND HEAP,
Comptroller and City Solicitor.



The Common Seal of the Mayor and Commonalty and Citizens of the City of London was affixed to these Byelaws at a duly constituted Meeting of the Court of Common Council held on the 29th day of November, 1973, and in my presence.

(Signed) EDWARD NICHOLS,
Town Clerk.

The foregoing byelaws are hereby confirmed by the Secretary of State for the Environment and shall come into operation on the 1st June, 1974.

(Signed) S.T. GARRISH
An Assistant Secretary in the Department
of the Environment.

Signed by the authority of the Secretary of State
2nd May, 1974.



CITY WALKWAY — ADDITIONAL BYELAW

ADDITIONAL BYELAW made under Section 12 of the City of London (Various Powers) Act 1967, by the Mayor and Commonalty and Citizens of the City of London, acting by the Common Council, with respect to City Walkways.

1. In this byelaw

“the Principal Byelaws” means the byelaws made by the Mayor and Commonalty and Citizens of the City of London on the 29th day of November, 1973 and confirmed by the Secretary of State on the 2nd May, 1974.

2. The following byelaw is inserted after byelaw 5(15) in the Principal Byelaws—

“(16) ride or cause to be ridden any roller skates or skateboard”.

Dated the 12th day of JUNE 1990.



The Common Seal of the Mayor and Commonalty and Citizens of the City of London was hereunto affixed in the presence of—

(Signed) T.C. SIMMONS
Deputy Town Clerk.

DET 1335

The foregoing byelaws are hereby confirmed by the Secretary of State for Transport and shall come into force on 26th March 1991.

Signed by authority of
the Secretary of State
for Transport
26 February 1991

(Signed) N.T. REES
An Assistant Secretary
in the Department
of Transport

ENC 7447

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Pete O'Doherty
Temporary Commissioner

Pete.O'Doherty@cityoflondon.police.uk

Direct line
020 7601 2002

13th November 2023

Ian Thomas CBE
Town Clerk and Chief Executive
City of London Corporation
Guildhall
London
EC2P 2EJ

Dear Ian,

Following extensive consultation and coordination between the City of London Police and The City of London Corporation, I am pleased to confirm that I fully endorse the use of Community Safety Accreditation Scheme (CSAS) Powers within the City of London.

The concept of CSAS was established by the Police Reform Act 2002 and enables me to accredit staff from a variety of sources that will include key stakeholders from Transport for London and private enterprise, with increased powers to deal with traffic management and to tackle graffiti, litter and anti-social behaviour. This supports policing efforts to reduce crime and disorder by increasing the effectiveness of their accredited staff and enabling a closer working relationship with local police forces.

CSAS authorisation requires enhanced training standards, accountability procedures and vetting, the governance of this is being established with the Metropolitan Police Service with whom we will work closely to ensure close scrutiny and management of those utilising the given powers.

Please accept this letter as formal notification of the endorsement of the CSAS powers.

Yours sincerely,

Pete O'Doherty
Temporary Commissioner

City of London Police HQ

Address 4th Floor, Guildhall Yard East, London EC2V 5AE

Telephone +44 (0) 20 7601 2222 **Textphone** +44 (0) 20 7601 2906

www.cityoflondon.police.uk

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Committees: Safeguarding Sub-Committee – For Information Community and Children’s Services Committee – For Information	Dated: 23/11/2023 13/11/2023
Subject: Children’s Social Care Self Evaluation Framework	Public (this report) Non-Public (Annexe 1)
Which outcomes in the City Corporation’s Corporate Plan does this proposal aim to impact directly?	1,2,3,4
Does this proposal require extra revenue and/or capital spending?	N
If so, how much?	£
What is the source of Funding?	N/A
Has this Funding Source been agreed with the Chamberlain’s Department?	N/A
Report of: Judith Finlay, Executive Director, Community and Children’s Services	For Information
Report author: Ellie Ward, Head of Strategy and Performance	

Summary

Children’s Social Care and Early Help are subject to inspection by Ofsted under the Inspecting Local Authority Children’s Services (ILACS) Framework. These inspections take place every four to five years and, in between, there are shorter, specific ‘focus’ visits and an Annual Engagement Meeting (AEM) with Ofsted.

Each year the Department of Community and Children’s Services produces a Self-Evaluation Framework (SEF) report which is used for the AEM and also for inspections.

This report presents the Self-Evaluation Framework for Members to note.

Recommendation

Members are asked to:

- Note the report.

Main Report

Background

1. Children’s Social Care and Early Help are subject to inspection by Ofsted under the ILACS Framework. These inspections take place every four to five years and, in between, there are shorter, specific ‘focus’ visits and an AEM with Ofsted.
2. The City of London Corporation’s last full inspection was in 2020 when we were rated ‘outstanding’ overall. A focus visit took place in November 2022 to look at

front door services. Feedback was very positive and there were no recommendations for improvement.

3. Each year the Department of Community and Children's Services produces a SEF report which is used for the AEM and also for inspections.
4. Though there is no set format or template for the SEF report, it is designed to allow the local authority to reflect on their delivery and performance, their challenges, how they have responded, and the impact they have had on children, young people and their families.
5. As part of our work to drive excellence in Children's Social Care, in 2020 we also established the Achieving Excellence Board (AEB), which is independently chaired by a former Ofsted Inspector who provides challenge to us on our services and performance, and provides advice on where we could strengthen services or approach.
6. The City of London Corporation's SEF is built around the aims of the AEB:
 - Doing the core job to a consistent standard
 - Being creative, pioneering and having a 'can do' culture
 - Having a relentless focus on outcomes.
7. Each area of our work, such as contacts, assessments, Early Help, children looked after (CLA), and care leavers are considered under these three headings.
8. A copy of the SEF is provided as Appendix 1 in non-public items.

Current Position

Doing the core job to a consistent standard

9. Overall, our performance in delivering our statutory responsibilities has maintained excellent quality and performance, despite the challenges of the pandemic, the cost of living crisis and the financial constraints in which we operate.
10. The number of CLA has decreased in recent years after a large increase around four years ago. However, the number of care leavers we support (at an increased level compared to other local authorities) has been increasing. National policy proposes an increased focus on care leavers and their needs. The service already exceeds this in terms of the support offered.
11. Our Early Help Service consistently achieves positive feedback and outcomes and was particularly effective in supporting our guests who were placed in the City of London as part of the Afghanistan Resettlement Programme. Over the past two years, the Early Help Service has run an innovative parenting course, developed by the Race Equality Foundation. One of its impacts has been that parents have developed their own peer support network.

12. There have been ongoing challenges around provision of health services to looked-after children. Specific difficulties have been around accessing dentistry, and health review performance being less efficient than planned. In addressing this, we have collaborated with health colleagues and paid for some emergency dentistry where needed.
13. A stable workforce means that children are able to form and sustain meaningful, consistent and stable relationships with their workers.
14. There is robust governance around Children's Social Care, with Members routinely trained and engaged in their role as Corporate Parent.

Being creative, pioneering and having a can do culture

15. This year we developed a family therapy clinic with King's College London, which is proving effective and valuable.
16. This year we introduced the co-location of a Forensic Child and Adolescent Mental Health Service (FCAMHS) clinician with members of the Social Care team.
17. The City of London Corporation's assets were utilised to create enrichment for our Children and Young People – for example, the project with the City's independent schools for Children who are Looked After (CLA) and care leavers to enrich their education. This also benefits young people at the City's schools.
18. A new programme of apprenticeships for our CLA and care leavers is being developed.
19. Secured Home Office immigration interviews to be conducted online with social worker support, which minimises stress and increases the speed and outcome of people's interviews.

A relentless focus on outcomes

20. External audits have been positive in terms of the impact for children and their families.
21. The SEF sets out some specific case studies illustrating the impact that the service has had.

Areas for improvement

22. The SEF sets out a number of improvements that focus on strengthening our existing robust work. These are included in our Service Development Plan which is monitored quarterly by the AEB and the Safeguarding Sub-Committee.

Corporate & Strategic Implications

23. Strategic implications – Our work in Children’s Social Care helps deliver on Corporate Outcomes 1–4 and the outcomes in a number of our other Departmental Strategies, including the Children and Young People’s Plan and the Special Educational Needs and Disability (SEND) Strategy.
24. Financial implications – none
25. Resource implications – none
26. Legal implications – Children’s Social Care Service operates within a legal framework set out in a number of Acts.
27. Risk implications – none
28. Equalities implications – none, but equalities implications are considered throughout the service and, where a new service or initiative is instigated, an Equalities Impact Assessment will be carried out.
29. Climate implications – none
30. Security implications – none

Conclusion

31. This report presents to Members the annual SEF for Children’s Social Care.

Appendices

- Appendix 1 (non-public) – City of London Corporation Self-Evaluation Framework (SEF) for Children’s Social Care

Ellie Ward

Head of Strategy and Performance

T: 020 7332 1535

E: ellie.ward@cityoflondon.gov.uk

Committee(s): Community and Children's Services	Dated: 13 December 2023
Subject: Community & Children's Services (Non-Housing) Revenue Outturn Forecast as at Quarter 2 2023/24	Public
Which outcomes in the City Corporation's Corporate Plan does this proposal aim to impact directly?	1,2,3,4,12.
Does this proposal require extra revenue and/or capital spending?	N
Report of: The Director of Community and Children's Services and the Chamberlain	For Information
Report author: Mark Jarvis, Head of Finance & Beatrix Jako, Financial Business Partner, Chamberlain's Department	

Summary

1. This report sets out the Quarter 2 estimated outturn for the Community & Children's Services Committee budget (excluding the ring-fenced Housing Revenue Account (HRA) Repairs and Maintenance budget, which will be reported with the Budget Estimates and the updated 5 year plan at the next Committee) for the year 2023/24.
 - The total local risk projected overspend for the full year is currently £263k, mostly related to children's services.
 - The total central risk budget is projected to overspend by £274k, mostly related to the increased cost of benefits administration and increased numbers of asylum seekers who are 18 years and above for whom we receive minimal government funding.

Table A - Summary of DCCS Budget and Projected Outturn (including HRA Repairs & Maintenance Budget) 2023/24			
	2023/24 Latest Approved Budget £000	Forecast Outturn £000	Variation Underspend / (Overspend) £000
DCCS Revenue (see details in Table B)			
Net local risk expenditure	(13,451)	(13,714)	(263)
Net central risk expenditure	(1,227)	(1,501)	(274)
DCCS Local and Central Risk Net expenditure	(14,678)	(15,215)	(537)

Recommendation

2. That the Q2 projected outturn report for 2023/24 is noted.

Main Report

Quarter 2 Projected Outturn

Table B below gives the detailed forecast by service area.

Table B - DCCS – City Fund Budget Monitoring Budget and Projected Outturn 2023/24					
	2023/24 Latest Approved Budget £000	Actuals to Q2 £000	Forecast Outturn £000	Variation Underspend / (Overspend) £000	Paragraph
<u>LOCAL RISK</u>					
Supervision and Management	(1,397)	(634)	(1,397)	-	
Housing Services					
Other Housing Service	5	(61)	5	-	
Supporting People	(577)	(254)	(577)	-	
Service Strategy	(6)	(20)	(6)	-	
Total Housing	(578)	(335)	(578)	-	
People Services					
Older People	(1,576)	(599)	(1,309)	267	3
Adult Social Care	(2,716)	(722)	(2,632)	84	
Occupational Therapy	(354)	(173)	(388)	(34)	
Homelessness	(3,192)	(1,394)	(3,185)	7	
Housing Benefit	104	20	104	-	
Children Social Care	(1,521)	(858)	(1,928)	(407)	4
Total People Services	(9,255)	(3,726)	(9,338)	(83)	
Education and Skills					
Early Years & Childcare	(648)	(235)	(638)	10	
Other Schools Related Activity	(253)	(135)	(354)	(101)	
Adult Community Learning	(191)	12	(162)	29	
Total Education and Skills	(1,092)	(358)	(1,154)	(62)	
Partnerships					
Commissioning inc. recreation	(683)	(638)	(797)	(114)	5
Public Health	30	789	30	-	
Youth Service	(173)	(69)	(177)	(4)	
Community Safety Team	(303)	7	(303)	-	
Total Partnerships	(1,129)	89	(1,247)	(118)	
TOTAL LOCAL RISK CITY FUND	(13,451)	(4,964)	(13,714)	(263)	

Table B - DCCS – City Fund Budget Monitoring Budget and Projected Outturn 2023/24					
	2023/24 Latest Approved Budget £000	Actuals to date £000	Forecast Outturn £000	Variation Underspend / (Overspend) £000	Paragraph
<u>CENTRAL RISK</u>					
Supervision and Management	(80)	-	(80)	-	
Commissioning inc. recreation	140	6	106	(34)	
Early Years and Childcare	(472)	(377)	(472)	-	
Other School Related Activity	516	2,417	516	-	
Asylum Seekers	(1,254)	(521)	(1,294)	(40)	6
Delegated Budget	30	(1,203)	30	-	
Other Housing Services	(40)	-	(40)	-	
Housing Benefit	(67)	(257)	(267)	(200)	7
Total Central Risk	(1,227)	65	(1,501)	(274)	
TOTAL LOCAL RISK & CENTRAL RISK CITY FUND	(14,678)	(4,899)	(15,215)	(537)	

3. The Older People local risk budget is projecting an underspend of £267k. It should be noted that we are awaiting agreements for placement costs uplifts which may be backdated to begin in April, as a result this forecast is subject to change throughout the year as package uplifts agreed.
4. The Children’s Social Care local risk budget is expected to overspend by a net £407k. This is due to the continued presence of a number of high cost placements which includes a new client in 2023/24 with an estimated cost of £415k per annum.
5. The Commissioning local risk budget is expected to overspend by £114k mainly due to higher than expected removal cost relating to the Mansell Street Community Centre.
6. The Asylum Seekers central risk budget is projected to overspend by £40k. There are increasing number of asylum seekers turning 18 years old for which we have a carers responsibility, but which attract little or no government funding from the Home Office.
7. Housing Benefit Administration central risk budget is projecting an overspend of £200k. This is largely attributable to a shortfall between housing benefits awarded for temporary accommodations and what the Department for Work and Pensions paid. Some of the accommodations are over their limit and

shortage of temporary accommodation at reasonable prices led to the increasing shortfall in this area.

8. The Homes for Ukraine Scheme continues during the year. The costs involved with these programmes are fully met from government grants and have no impact on the Directors overall net forecast outturn.
9. In general it should be noted that both the social care and asylum budgets are very volatile and a small change in client numbers has a major effect on the eventual full year outturn.

Caroline Al-Beyerty
Chamberlain & CFO

Judith Finlay
**Director of Community &
Children's Services**

Contact officers:

Mark Jarvis
Head of Finance – Chamberlains
E: Mark.Jarvis@Cityoflondon.gov.uk

Beatrix Jako
Financial Business Partner – Chamberlains
E: Beatrix.Jako@cityoflondon.gov.uk

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