

Item No.	Classification: Open	Date: 2 March 2023	Decision Taker: Deputy Leader and Cabinet Member for Children, Young People, Education and Refugees
Report title:		Approval of Publication of Closure Proposals for Townsend Primary	
Ward(s) or groups affected:		North Walworth	
From:		Strategic Director of Children and Adult Services	

RECOMMENDATION

1. That the deputy leader and cabinet member for children, young people, education and refugees agree to publish proposals to close Townsend Primary School from the 31 August 2023 onwards.

BACKGROUND INFORMATION

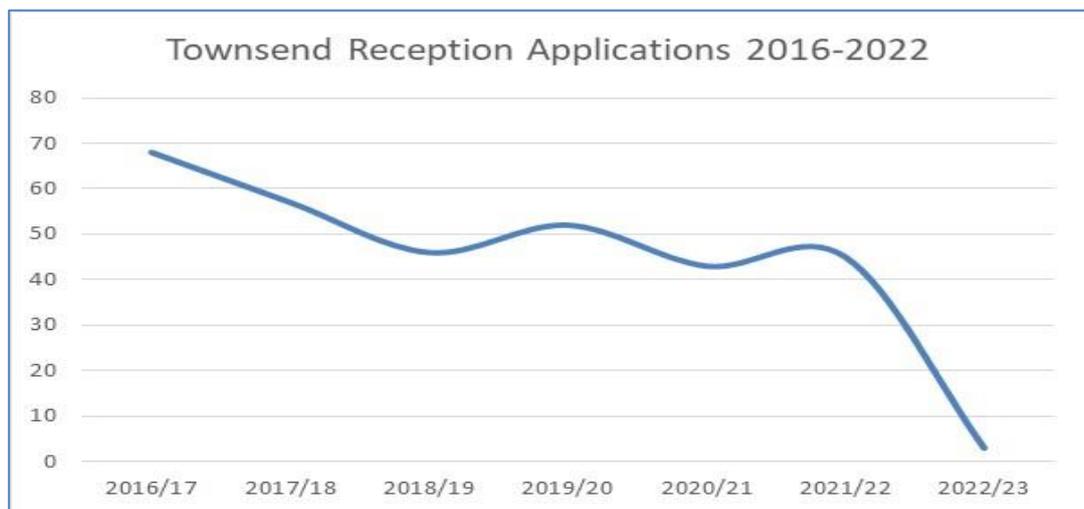
2. Falling numbers of pupils is a serious issue for primary schools right across the capital. London Councils (2023) has confirmed that 'London local authorities and schools are currently dealing with a significant and sustained period of reduction in demand for reception places, which has implications for school budgets and standards. The fall in demand reflects the decline in the birth rate since 2012 and changes in migration patterns'.
3. In Southwark this trend has previously been considered by cabinet in relation to the Pupil Place Planning Report 2022 (October 2022). In December 2022 cabinet agreed a Strategy to address this issue: 'Keeping Education Strong: Strategy for future proofing primary schools and protecting the quality of education in Southwark'.
4. As set out in the strategy, there are presently 777 (22%) primary reception vacancies in Southwark. This is having a severe impact on school finances as school funding is based on the number of children on roll - while rolls are falling, schools have to continue to pay for maintenance of buildings and staffing structures for more places than there are pupils. It is a principle of the council to protect Southwark's high quality of education and this may be compromised where the cost of teaching staff, equipment and enrichment activities become unaffordable.
5. The council has taken action including supporting the merger and federation of schools and reducing the number of surplus places by reducing the Published Admissions Number (PAN) of schools. However, the link between pupil numbers and school funding means that it is not always feasible to keep a school operating and guarantee a continuing high standard of education for the pupils remaining.

6. Townsend Primary School is a one form entry (1FE) primary school in Walworth. The school is situated in Southwark Council's School Planning Area 1 (PA1) - Borough, Bankside and Walworth. In recent years, the school has not been able to fill the 30 places it is able to admit each year. This academic year, starting September 2022, only 11 children took up Reception class places, and 17 joined Reception the previous year. Townsend has a capacity of 210 across all year groups of the school, 131 places are currently filled with 79 places empty - 38% of Years Reception to 6, substantially above the council's average vacancy level of 22%. This low level of admissions has had a considerable financial effect on the school over recent years, which has led to a substantial and growing in year financial deficit. Forecasts for the school and the locality from the GLA show numbers continuing to fall locally and across Southwark – this is explored in detail in the school place planning report for 2022.
7. As regards the applicants the school has received since 2016, there has been a considerable drop in expressed preferences overall. This, along with 21% drop in births in planning area 1, make it unlikely that pupil numbers will recover at Townsend. Table 1 below shows the falling number of applications that Townsend has received each year since 2016.

Table 1: Applicants by preference and total, 2016-2022 - Preferences 1 to 6

Year	1	2	3	4	5	6	Total	PAN	Preferences 1-3
2022/23	2	1	0	0	0	0	3	30	3
2021/22	11	7	11	5	8	3	45	30	29
2020/21	12	9	11	5	3	3	43	30	32
2019/20	17	13	4	9	3	6	52	30	34
2018/19	19	8	8	4	4	3	46	30	35
2017/18	19	10	11	7	6	4	57	30	40
2016/17	21	13	11	13	6	4	68	30	45

("PAN" in the table above means the pupil admission number. In the table, it is a reference to the number of pupils that a school can accept into its Reception intake each year. Column 1 shows the number of first preference school applications received, column 2 the number of second preferences etc.).

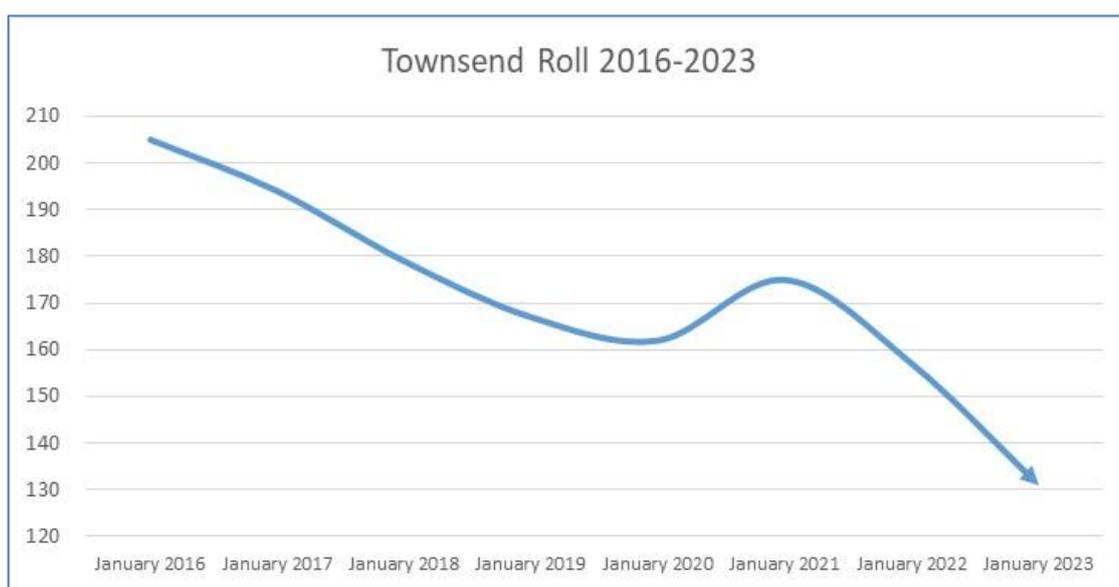


8. Pupil Numbers at the school have fallen since January 2016 as well by 74 pupils overall (36%).

Table 2: Pupils by year group 2016-2023

Year	R	1	2	3	4	5	6	Total
2022/23	11	17	20	16	20	25	22	131
2021/22	17	20	23	20	27	25	25	157
2020/21	20	26	24	25	27	24	29	175
2019/20	22	21	20	24	23	27	25	162
2018/19	21	20	24	26	28	23	25	167
2017/18	21	24	28	27	24	25	30	179
2016/17	27	30	27	26	29	30	25	194
2015/16	30	29	29	30	30	27	30	205

9. It has become increasingly clear that the school is no longer sustainable financially or organisationally, and that, after evaluation of a number of options, closure of the school should be considered and consulted on.



10. Amongst the considerations for proposing closure are:
- *The pupil roll has fallen over the past five years resulting in reduced (pupil led) funding. This reduced funding has created significant deficit (£599,000), and it is thought to be unlikely that the school will be able to reverse this trend and prevent this deficit growing over future years if it remains open.*
 - *This funding position would have a detrimental impact on staffing and resources, which would limit the school's ability to continue to provide the high quality of education that the children in the school community need and deserve.*
 - *The school would be hampered in its capacity to deliver the broad and balanced curriculum that it would be reasonable to expect of a primary school.*
 - *Southwark has capacity in neighbouring schools to meet the needs of all pupils transitioning from Townsend to other schools.*
11. In considering the closure of a school, Southwark is required to follow the

Department for Education's (DFE) guidance: "*Opening and closing maintained schools, Statutory guidance for proposers and decision-makers* (January 2023). This sets out a five-stage process as outlined below.

12. The deputy leader and cabinet member for children, young people education and refugees agreed in December 2022 to start a consultation on the proposal to close Townsend Primary School from 31 August 2023. This report seeks approval to move to the next stage of the process, the publication of proposal to close the school. A final decision on whether to proceed with the closure of the school would be taken by the council's cabinet at the end of the representation period that follows the publication of proposal.

KEY ISSUES FOR CONSIDERATION

The procedure for the consideration of a school closure

13. The **five stages** to a school closure consideration outlined in the guidance and mentioned in paragraph 11 are set out below
 - *Stage 1: Statutory Consultation with interested parties (COMPLETE)*
 - *Stage 2: Publication of proposals (THIS PAPER REQUESTS THIS)*
 - *Stage 3: Representation from publication;*
 - *Stage 4: Cabinet decision, and finally,*
 - *Stage 5: Implementation of proposals, if agreed*
14. The LA held a series of informal, information sessions during November 2022, with parents of children at the school, staff and key stakeholders to explain the situation that the school was in and to give notice that a formal process to consult on proposal for closure was to begin.
15. Following cabinet member approval to proceed, the LA undertook Stage 1 – Statutory Consultation with interested parties from the 5 January 2023 to the 28 February 2023. Feedback from the consultation is summarised in paragraphs 25 and 26 below.
16. The deputy leader and cabinet member for children, young people education and refugees is required to consider the feedback from this consultation before approving the publication of formal closure proposals (Stage 2) and to invite further comment on formal proposals from stakeholders. These proposals are set out in Appendix 3 of the report.
17. Stage 3 will involve the receipt of formal representations from interested parties and stakeholders for a 4-week period of time in March 2023. Feedback from this exercise and previous consultation will be summarised and taken into account in a report to cabinet, scheduled to occur in later in the year (date to be confirmed) (Stage 4). Stage 5 – should the cabinet agree to the closure of the school - would be the formal process of the school closing on the 31 August 2023.

18. The timetable outlined above is given in tabular format below:

Stage	Dates
Stage 1: Statutory Consultation with interested parties	5 January 2023 to 25 February 2023
Stage 2: Publication	March 2023
Stage 3: Representation	March 2023 to April 2023
Stage 4: Cabinet decision	June 2023
Stage 5: Implementation	31 August 2023

Results of the pre-publication consultation (Stage 1)

19. It is a statutory requirement for the Proposer (in this case the LA) to consult any parties they think appropriate before publishing statutory proposals.
20. The process included a statutory element of consultation that lasted for 6 weeks to allow the widest possible opportunity for views/comments to be made by parents, carers, local residents and other stakeholders. The purpose of the consultation was for the LA to seek the views of and engage with those that could potentially be affected by the proposed closure of Townsend School. It was also an opportunity for interested parties to suggest other options for consideration on the proposed closure of Townsend School in August 2023.
21. In addition to this, Southwark sought the views of:
- *All schools/admission authorities in Southwark, governing bodies and academy trusts (via the Headteacher and the Chair of Governors).*
 - *Neighbouring Councils (Lambeth, Tower Hamlets, Lewisham, Croydon, Wandsworth, and Westminster)*
 - *All Southwark Councillors and MPs*
 - *The SDBE and the Catholic Diocese*
 - *Appropriate trade Unions*
22. Consultation has been undertaken by:
- *Placing a note on the school website containing the consultation documents.*
 - *Setting up a website that allowed people to answer the consultation questions.*
 - *Giving an email address to allow for parents, carers and stakeholders to feed back on the pre-publication proposals.*
 - *Distribution of a paper form for stakeholders to respond to.*
 - *An email to all of the five, additional stakeholder groups listed above was sent by the LA*
 - *Six consultation meetings for parents, carers, community and stakeholders were held in December 2022 and January 2023.*
 - *Consultation with staff, and their professional associations/trade unions is presently being undertaken*
23. The results of the initial consultation are outlined in paragraphs 25 to 26 of this report.

24. At the conclusion of the statutory consultation outlined above, the LA has reviewed the feedback they received. No substantive objections were raised by stakeholders, nor were any viable alternative proposals put forward.

Responses to issues raised in the initial pre-publication consultation

25. No representations were received from neighbouring councils, councillors, the SDBE or the Catholic Diocese. The trade unions had a number of operational queries, and liaised extensively with the school's Human Resources (HR) advisors. No trade unions formally objected to the school closure.
26. Two responses were received from the consultees outlined in paragraph 21. Neither response objected to the closure of the school.

Publication of the notices and representation (Stages 2 and 3) and responses to issues raised in the post publication consultation

27. The LA will, if approval is given, proceed to the next, formal stages of the process (Stage 2) with the publication of the proposals, requesting responses from the date to be confirmed to the date to be confirmed. Formal notices (Appendix 2) will be published and displayed at the school, placed on the school website and in the local press, inviting comment on the Statutory proposal (Appendix 3) – this would complete stage 3 of the statutory process.

Cabinet decision (Stage 4)

28. At the conclusion of Stages 2 and 3 and in line with the statutory guidance, the decision maker is the cabinet of the council and the proposals and such observations, feedback, objections and comments will be presented to the cabinet for scrutiny and decision. The cabinet is empowered to:
- *Agree the closure proposal*
 - *Agree the closure proposal with modifications*
 - *Refuse the closure proposal*
29. If cabinet does not take a decision on the school closure within 2 months of the expiry of the formal notice (i.e. by the date to be confirmed), the matter would then be referred to the Office of the Schools Adjudicator (OSA) for final decision. The following bodies have the right to have the decision referred to the Schools Adjudicator in any case, independent of the local authority after the cabinet decision is taken.
- *The Diocesan Board of Education of any C of E Diocese in the relevant area.*
 - *The Bishop of any Roman Catholic Church in the relevant area.*
 - *The governing body or any foundation of the foundation or voluntary school specified in the proposals.*

Formal closure of the school (Stage 5)

30. If cabinet agrees to the proposals to close, this will be effective from 31st August 2023.

Actions undertaken for the pupils, parents and carers affected

31. The local authority, as the body responsible for school admissions in Southwark, has had to plan for every eventuality to ensure that all children attending Townsend Primary School have a school place for September 2023. Support has been offered to parents, carers and pupils to manage the transition – should it be decided that the school should close – from Townsend to other schools. A coordinated admissions process, led by the local authority's school admissions team has been established to ensure that the parent/carer of each child on the roll of Townsend will have access to an admissions application and be able to state preferences of alternative schools. A dedicated admissions officer has been allocated to work closely with families and school staff and ensure that every child is able to secure a school place for September 2023.
32. Similarly, children with special educational needs are being fully supported to make this transition with reviews of their Education, Health and Care Plans where appropriate.
33. It should be noted that there are **9** Southwark schools within 0.6 miles of Townsend; all within a reasonable walking distance. At the beginning of the year, these 9 schools had around 665 vacant school places across Reception to Year 6.

Actions undertaken for the teachers and non-teaching staff affected

34. The situation at the start of the process was that the LA informed their staff at the earliest possible opportunity that there was a potential that the school would close in August 2023. The trade unions were also involved at this stage.

Community, equalities (including socio-economic) and health impacts

Community impact statement

35. The Public Sector Equality Duty, at section 149 of the Equality Act, requires public bodies to consider all individuals when carrying out their day-to-day work, in shaping policy, delivering services and in relation to their own employees. The statutory guidance requires the cabinet to consider the impact of this proposal on local integration and community cohesion objectives when they are taking a decision on the proposals. Given that most children are remaining within the locality it is not felt that there will be any discernible impact on integration and community cohesion.
36. Public bodies are required to have due regard when carrying out their activities to the need to eliminate discrimination, advance equality of opportunity, and foster good relations between people with protected characteristics and those with none. The council's "Approach to Equality" commits the council to ensuring equality is an integral part of our day-to-day business.
37. "Protected characteristics" are the grounds upon which discrimination is unlawful. The characteristics are: age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, gender and sexual orientation. In this case, the characteristics covering gender reassignment,

marriage and civil partnership, pregnancy and maternity, and sexual orientation are unlikely to be issues to consider in terms of place planning. In terms of age, disability, race, religion or belief.

38. With regard to the Ministry of Housing, Communities & Local Government "Integrated Communities Action Plan" - the guidance issued by the Government lists (under "Education and Young People") a list of actions that schools and local authorities should reference, if needed. None of the 16 issues raised as part of the plan are appropriate to this proposal.

Equalities (including socio-economic) impact statement

39. A detailed Equality and Health Impact Assessment (that includes socio-economic impact) has been completed and is attached at Appendix 4. The statutory guidance requires the cabinet to consider the impact of this proposal on local integration and community cohesion objectives when they are taking a decision on the proposals. Given that most children are remaining within the locality it is not felt that there will be any discernible impact on integration and community cohesion.

Health impact statement

40. The Equality and Health Impact Assessment has been completed and is attached at Appendix 4 - this includes Health impacts. No adverse health impacts were ascertained during the Impact Assessment process

Climate change implications

41. Following the Council Assembly meeting on the 14 July 2021, the council has now committed to considering the climate change implications of any decisions made. The council is developing a toolkit for staff on the council's climate change strategy. This provides guidance for staff to consider climate change impacts. Cabinet report authors are now required to detail the implications of their recommendations. This report has not directly considered the impact of climate change in the main body of the report, as the effects on climate change of the recommendation will have a minimal effect on climate change.
42. As the numbers of pupils in the authority area falls, and the numbers of pupils attending particular schools reduce, then it is likely that less pupils will be travelling to schools, thereby potentially reducing travel (and carbon emissions) overall, and, where it is utilised, car use. There will be a negligible effect on the other categories outlined - enhancing the environment and green space, green jobs and businesses, sustainable energy and reducing waste, so these are not substantively addressed in this report.
43. No direct measures have been taken to reduce or enhance the impact on climate change as part of this work, as no substantive negative effects have been identified. Additionally, as no direct measures have been taken to reduce or enhance the impact on climate change as part of this work, no monitoring will be required. As explained above, the falling numbers of pupils is likely, if anything, to have a net positive effect (albeit small) on climate change, as less pupils attend school and are therefore transported by car or other forms of transport.

44. Whilst reducing the number of school places will not directly enhance the environment and green space, or create "green" jobs and businesses, less schools operating could potentially benefit sustainable energy or reduce energy and waste from consumables
45. Therefore, there will be, in our opinion, no substantive negative effects as a result of the recommendations and proposals.

Resource and risk implications

46. The council aims to ensure that demand for school places is as closely matched to supply as possible. The closure of a school where there is considerable overcapacity supports this process.
47. Section 14 of the Education Act 1996, places a duty on local authorities to "*secure that sufficient schools for providing primary and secondary school education are available for their area*". The authority is required to exercise these functions with a view to increasing opportunities for parental choice. The large level of existing and anticipated vacancies and the compact nature of Southwark's geography mitigate considerably against any risk of there being insufficient places to house pupils affected by the closure.
48. The freehold of the building belongs to the council, who would ultimately decide what use the building would be put to, if closure were agreed. Planning constraints presently limit the use of the building for anything other than education or training purposes. Southwark Council's clear preference would certainly be for the building to remain in use as an educational or community facility.

Legal implications

49. Please see the comments below from the Assistant Chief Executive – Governance and Assurance.

Financial implications

50. The Dedicated Schools Grant (DSG) Schools Block, which is awarded to fund education provision, is primarily calculated using pupil numbers and pupil characteristics. Consequently, there is expected to be minimal impact on the amount of the grant as a consequence of the closure. With a similar amount of income spread over a smaller number of schools, there will be a positive impact on the financial position of schools. This will be seen in those schools which accept pupils formerly attending Townsend.
51. Townsend Primary ended the 2021-22 financial year in a deficit position of £599,000. This forecast is expected to rise significantly if the school remains open therefore it is important that decisive and timely action is taken.
52. It is also estimated that the closure will also incur costs such as redundancies, site security, uniforms for children transferring to other schools, archiving/disposal etc. and is estimated at around £470,000. In order to minimise

the costs of closure it is important that the school and officers work together to maximize redeployment opportunities to existing staff to alternative, suitable positions.

Human resource implications

53. The council is the employer of all staff at the school, and will follow formal staff redundancy processes in consultation with trade unions and staff as per the Restructure, Redeployment and Redundancy Policy. This may or may not result in staff redundancies.

Consultation

54. Consultation in this proposal has been extensive including the statutory consultation processes and has involved all relevant stakeholders, and is outlined in paragraphs 19 to 24.

SUPPLEMENTARY ADVICE FROM OTHER OFFICERS

Assistant Chief Executive – Governance and Assurance

55. This report seeks the agreement of the cabinet member to publish proposals to close Townsend Primary School under the Education and Inspections Act 2006. Townsend School is a community school and the council therefore has the power under section 15 of the 2006 Act to propose closure.
56. As explained in the report, publication can only occur once statutory consultation processes have taken place. These have been carried out in accordance with the 2006 Act, the School Organisation (Establishment and Discontinuance of Schools) (England) Regulations 2013 and the DFE statutory guidance “Opening and Closing Maintained Schools”. A statutory proposal to close has to be published within 12 months of the consultation being completed.
57. The decision to publish school closure proposals is an executive decision which is delegated and reserved to the cabinet member in accordance with part 3D of the council’s constitution.
58. A process of statutory consultation has been carried out in relation to this proposal, the results of which are set out in the report. It is necessary for the cabinet member to properly consider the results of that consultation and take them into account when deciding whether to proceed to publish statutory closure notices.
59. The report clarifies how the notices will be published, that this will be for a four-week period, and that any representations made as a result of the notices will need to be considered prior to any decision to close the school. This will be the subject of a separate report and is a decision that is reserved to the cabinet to make.
60. When making this decision, the cabinet member should have regard to the statutory guidance “*Opening and closing maintained schools*” issued by the Department for Education in November 2019.

61. The proposals will be “published” (stage 3 of the statutory process) by the LA in April 2023. Any person may send objections or comments to these proposals to the council within four weeks of the date of publication of the proposals. Any objections or comments will need to be considered prior to any decision to close the school. This will be the subject of a separate report and is a decision that is reserved to the cabinet to make.
62. The cabinet decision in relation to these proposals has to be made within two months of the close of the representation period of the publication of the statutory proposals, or the decision has to be referred to the Schools Adjudicator to make. If the decision is made to approve the proposals to close the school, the 2006 Act requires these to be implemented by the council.
63. The cabinet member needs to apply the public sector equality duty in section 149 Equality Act 2010 in making this decision, which requires it to have due regard to the need to (a) eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under the Act; (b) advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it; (c) foster good relations between persons who share a relevant protected characteristic and persons who do not share it. An equalities impact analysis has been produced and needs to be considered by the cabinet member in making this decision.
64. The cabinet member also needs to have regard to the council’s statutory duty under section 14 of the Education Act 1996 to secure that sufficient schools for providing primary and secondary education are available for their area. The report clarifies the availability of alternative schools in the event of the closure of Townsend School.

Strategic Director of Finance and Governance

65. The strategic director of finance and governance notes the proposal to close Townsend Primary School. Maintained schools receive the majority of their funding via the Dedicated Schools Grant, which is broadly distributed on a per-pupil basis. As a result, falling rolls over a period of time can result in significantly reduced grant income, which can impact the ability of a school to balance its budget whilst maintaining teaching and learning standards at the school. In the case of Townsend Primary School, the financial strain due to falling rolls is compounded by its location where there are significant surplus places across the maintained school estate. Schools in financial difficulty contribute to wider financial stresses within the maintained schools estate and so it is important that the financial position of all schools are reviewed regularly to ensure they are living within their means.
66. Section 22 of the Schools and Standards Framework Act (SSFA) 1998 sets out the Local Authority’s responsibilities with respect to the funding of schools and includes a duty to defray all the expenses of maintaining a school. When a maintained school closes, any outstanding deficit falls to the council to be written off. Whilst the financial management of maintained schools is delegated to their governing bodies, ultimate responsibility lies with the local authority and it is incumbent upon officers and members to ensure robust governance and controls

are in place, both with respect to falling rolls and financial deficits, to limit any further exposure to financial risk arising from schools in deficit.

BACKGROUND DOCUMENTS

Background Papers	Held At	Contact
Opening and closing maintained schools Statutory guidance for proposers and decision makers January 2023	Education Directorate 4 th Floor, Children's and Adults' Services, 160 Tooley Street, London, SE1 2QH	Ric Euteneuer 07925 637558
Link (please copy and paste into your browser): https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1131568/Opening_and_closing_maintained_schools_Jan_2023.pdf		
School Admissions Code - Statutory guidance for admission authorities, governing bodies, local authorities, schools adjudicators and admission appeals panels. 2021 – DfE	Education Directorate 4 th Floor, Children's and Adults' Services, 160 Tooley Street, London, SE1 2QH	Ric Euteneuer 07925 637558
Link (please copy and paste into your browser): https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1001050/School_admissions_code_2021.pdf		
Integrated Communities Government Action Plan, February 2019	Education Directorate 4 th Floor, Children's and Adults' Services, 160 Tooley Street, London, SE1 2QH	Ric Euteneuer 07925 637558
Link: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/778045/Integrated_Communities_Strategy_Govt_Action_Plan.pdf		
The Essential Guide to the Public Sector Equality Duty – EHRC July 2014	Education Directorate 4 th Floor, Children's and Adults' Services, 160 Tooley Street, London, SE1 2QH	Ric Euteneuer 07925 637558
Link: https://www.equalityhumanrights.com/sites/default/files/guidance-essential-public-sector-equality-duty-england_0.docx		
Managing Surplus School Places in London (2023) – London Councils	Education Directorate 4 th Floor, Children's and Adults' Services,	Ric Euteneuer 07925 637558

Background Papers	Held At	Contact
	160 Tooley Street, London, SE1 2QH	
https://www.londoncouncils.gov.uk/our-key-themes/children-and-young-people/education-and-school-places/managing-surplus-school-places		
Pupil Places Planning Report 2022, Southwark Council, October 2022	Education Directorate 4 th Floor, Children's and Adults' Services, 160 Tooley Street, London, SE1 2QH	Ric Euteneuer 07925 637558
Link (please copy and paste into your browser): https://moderngov.southwark.gov.uk/documents/s109543/Report%20Annual%20School%20Place%20Planning.pdf		
Keeping Education Strong Strategy - Strategy for future proofing primary schools and protecting the quality of education in Southwark	Education Directorate 4 th Floor, Children's and Adults' Services, 160 Tooley Street, London, SE1 2QH	Ric Euteneuer 07925 637558
Link (please copy and paste into your browser): https://moderngov.southwark.gov.uk/documents/s110486/Appendix%201%20Place%20planning%20across%20Southwarks%20Primary%20Schools%20A%20strategy%20for%20future-%20proofing%20quali.pdf		

APPENDICES

No.	Title
Appendix 1	Map showing the location of Townsend Primary School
Appendix 2	Statutory Notice for Closure
Appendix 3	Statutory Proposal
Appendix 4	Equality and Health Impact Assessment

AUDIT TRAIL

Lead Officer	David Quirke-Thornton, Strategic Director of Children and Adult Services	
Report Author	Nina Dohel, Director of Education	
Version	Final	
Dated	28 February 2023	
Key Decision?	Yes	
CONSULTATION WITH OTHER OFFICERS / DIRECTORATES / CABINET MEMBER		
Officer Title	Comments Sought	Comments Included
Assistant Chief Executive – Governance and Assurance	Yes	Yes
Strategic Director of Finance and Governance	Yes	Yes
Cabinet Member	Yes	No
Date final report sent to Constitutional Team	1 March 2023	