Item No. N/A	Classification: Open	Date: 26 September 2023	Decision Taker: Deputy Leader and Cabinet Member for Children, Young People Education and Refugees	
Report titl	e:	Comber Grove Primary School Consultation		
Ward(s) or groups affected:		Camberwell Green		
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 commence consultation on a proposal to close Comber Grove Primary School from 31 August 2024.

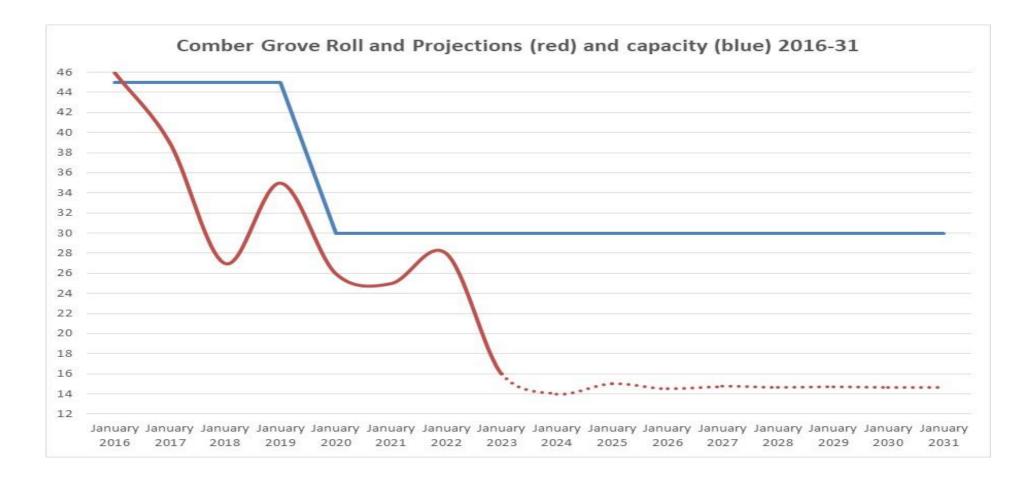
BACKGROUND INFORMATION

- 2. Comber Grove Primary School is a 1 Form Entry (FE) primary school, situated in Camberwell in the Camberwell Green ward. For place planning purposes, the school is situated in Southwark pupil place planning area 4 (PA4 Camberwell).
- 3. The school was, until 2019, a 1.5FE primary school (PAN of 45), when, due to falling rolls, the PAN was reduced by 15 to 30. Despite this, rolls have remained low at the school. Reception numbers fell to 16 in 2022-23 and are not expected to increase in 2023-24 or in the foreseeable future. As school funding is based on the number of children on roll the resources available for education are reducing. It is a core principle of the Council to protect Southwark's high quality of education this may be compromised where the cost of teaching staff, equipment and enrichment activities become unaffordable.
- 4. Falling numbers of pupils is a serious issue for primary schools right across the capital. London Councils (2023) 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'.

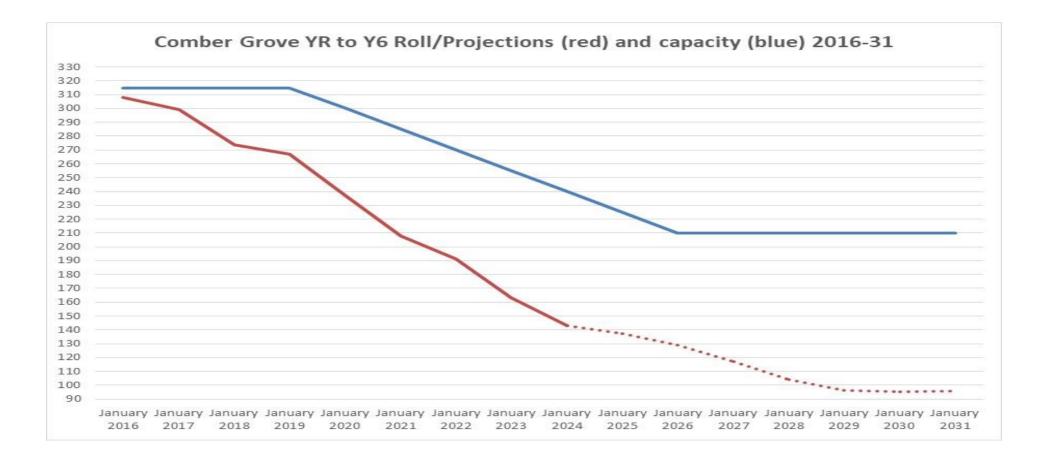
- 5. In Southwark, this trend was previously noted by Cabinet in relation to the Pupil Place Planning Report 2022 (October 2022). This report noted a substantial reduction in primary pupil numbers across the authority area in the last 5 years, particularly in the Camberwell locality (Planning Area 4), as well as a projected continuation of this reduction at least until the end of the decade.
- 6. In December 2022, Cabinet considered a report 'Keeping Education Strong: Strategy for future proofing primary schools and protecting the quality of education in Southwark'. This outlined a strategy to address falling rolls.
- 7. A further update on this Strategy, 'Keeping Education Strong Recommendations', was approved by cabinet at its June 2023 meeting. This included a recommendation that the council should have discussions with Comber Grove Primary School about the possibility of amalgamating with another Southwark Primary School.
- 8. Options for Comber Grove Primary School to amalgamate with other nearby primary schools have been explored. This would entail the school closing and all pupils being offered a place at one local school. While there are places available for all children nearby, no one school has space to accommodate all the children and in any event the geographical spread of schools across the area means that parents are likely to choose between a range of different schools.
- 9. It is proposed to consult on the closure of Comber Grove Primary School, both because the school itself is becoming unsustainable and in order to strengthen remaining local schools which are also challenged by the reduction in the primary school age population.
- 10. The proposal to consult on closure of the school comes to the cabinet member for agreement, as the council's constitution requires member authorisation for this type of consultation.
- 11. The council's constitution Section 3D decisions for Individual Cabinet Members - Paragraph 20 states: "*To agree the following school organisation decisions: Agreement to carry out the initial consultation where the council is proposing to make a statutory change to a school*".

KEY ISSUES FOR CONSIDERATION

12. A key factor to consider is the continuing fall in roll and pupil numbers at Comber Grove. Overall, the school's roll at reception has fallen from 46 in 2015-16, to 16 in September 2022.



13. The roll in 2015-16 in all year groups was 308, and in September 2023, is expected to be 143, a reduction of **54%**. Vacancies at the school overall across all year groups have risen from 7 in 2015-16 (**2%**) to an expected 97 in September 2023. The school's roll is unlikely to recover before 2035 based on GLA predictions below:



14. The 2022-2023 roll by year group and the vacancy number for each are given below for Comber Grove School. The school was formerly a 1.5FE school but reduced its PAN from 45 to 30 via an application to the Office of the Schools Adjudicator in 2019-20 - this accounts for the different PANs in years 4 to 6.

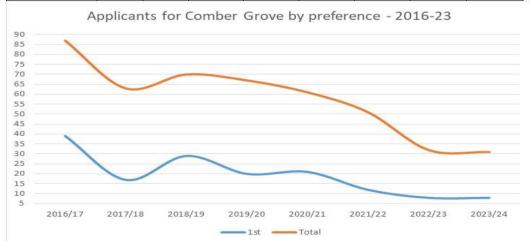
Year	R	1	2	3	4	5	6 T	otal
PAN 2022-23	30	30	30	30	45	45	45	255
Roll	16	23	28	26	21	18	31	163
Vacancies	14	7	2	4	24	27	14	92

Table 1 Comber Grove Roll 2022-23 by Year Group

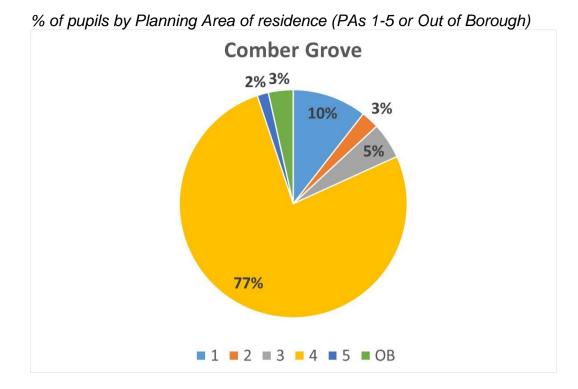
15. The school therefore presently has 92 vacancies across all year groups, 36% of the available roll. Reducing the PAN from 45 to 30 did not substantively address the overcapacity, and rolls are projected to continue to reduce. Applications to the school at reception have also fallen considerably. Since 2016, the overall number of applications has fallen from 87 to 31, a reduction of 64%. Similarly, for 1st preferences, numbers have reduced by 79%, and 1st to 3rd preferences by 70%

1 st 2nd 3rd **∆**th 5th 6th Total PAN Year 2016-17 2017-18 2018-19 2019-20 2020-21 2021-22 2022-23 2023-24

Table 2 – Applicants to Comber Grove 2017-2023

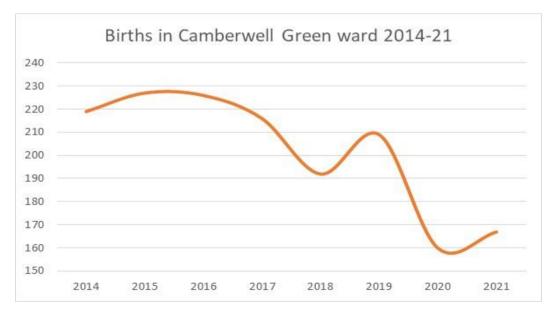


16. The origin of most pupils is mainly from Planning Area 4 (77%) and, of these, the great majority (70%) come from the Camberwell Green ward. Of the non-PA4 pupils, the biggest proportion come from PA1 (Borough, Bankside and Walworth), a planning area that has also seen a considerable drop in numbers and births.



 Births in the Camberwell Green ward – where the school is situated and where over 70% of its pupils come from – have reduced since 2016 by 59 – 26% lower in 2021 than previously. This would usually lead to a reduction in reception roll four years hence, meaning there will be a further drop in 2024 of around 49 births (23%).

Year	2014	2015	2016	2017	2018	2019	2020	2021
Births	219	227	226	216	192	209	160	167



- 18. In respect of future projections, the Greater London Authority (GLA) project that, if nothing changes:
 - Rolls at Comber Grove Primary will fall by a further 59 pupils in the next 5 years – a 36% reduction;
 - Reception rolls in the locality the planning area (PA4) surrounding the school fell by around another 172 pupils (a 27% reduction) between 2016 and 2023 and are projected to fall further by 54 pupils from 2023 to 2031 (11%);
 - Year R to 6 rolls in PA4 fell by 465 pupils, (11%) between 2016 and 2023, and there will be 838 fewer pupils overall (24%) from 2023 to 2031;
 - Births in the Camberwell Green Ward are projected to remain at the same level from 2021 to 2031 this will feed through to a substantial reduction in reception pupils.
- 19. If Comber Grove were not to close in August 2024, the roll estimates for following year's year group totals would be as shown in the table below, with vacancies increasing to 39% of the roll).

Year	R	1	2	3	4	5	6 T	otal
PAN 2023-24	30	30	30	30	30	30	45	225
Roll	15	13	15	23	27	25	20	138
Vacancies	15	17	15	7	3	5	25	87

Table 3 Comber Grove Roll 2024-25 Projected roll and vacancies

- 20. Comber Grove is situated in the council's school place planning area 4 (PA4), which covers the Camberwell area and has seen a substantial growth in surplus places in Southwark. Presently, there are 117 (4FE) reception places surplus in this area 21% of all available reception places. Overall, Year R to 6 vacancies total 1,006, around 22% of all available places in schools.
- 21. All of these factors combined means that pupil numbers at Comber Grove are unlikely to recover in the near future, and that the school is likely to fall further into a state of economic and financial unviability, with consequent effects on standards and quality. As schools are funded primarily on a per pupil basis, falling rolls result in reduced budgets. This in turn impacts on the resources available to support a high quality of education.

22. The council has assessed the following possible options for the school going forward:

Option	Appraisal
Status quo	Not taking action would be likely to result in the financial position of the school becoming increasingly difficult and education standards declining.
Further PAN Reduction to 0.5FE	A school with an overall roll of 105 would not be financially viable – and would lack the resilience larger schools have to cover for staff absence and resource deployment.
Forming a hard federation with another school	A hard federation would not substantively address the low rolls the school is presently experiencing.
Amalgamating with another school, entailing the closure of the school.	No one nearby school could accommodate all the children and in any event the geographical spread of schools across the area means that parents are likely to choose between a range of different schools
Entering into an arrangement with a Multi Academy Trust/	The school is understood to have had discussions with a MAT operating in their local area. A decision for the school to join a MAT would ultimately be for the school, the MAT and the Department for Education's Regional Schools Director. However Southwark would not support this as this would not address the falling rolls issue at the school and in the local area.
Closure of the school	This is the preferred option for consultation on the basis that it will prevent a decline in education standards for the pupils currently attending the school, as well as strengthening other local schools by taking out surplus capacity.

23. After consideration of all the above options for Comber Grove, the recommendation is to consult on the closure of Comber Grove from 31 August 2024.

Accommodating displaced children in alternative schools in the event of a closure

- 24. The LA is confident that all children presently attending Comber Grove School and all applicants to reception for September 2024 can be accommodated in alternative schools within a reasonable distance.
- 25. There are currently 845 vacant places across year groups in 10 Southwark schools which are within 0.7 miles of the school (1,220 including the 4 Lambeth schools within the same distance), many times the existing numbers on roll. Presently there are 117 reception places vacant at these Southwark schools more than 3 times the PAN of the school 190

including Lambeth vacancies in schools within the same distance.

Policy framework implications and decision-making

- 26. Southwark council's 'Fairer, Greener, Safer Delivery Plan 2022 2026' restates the council's long term commitment to ensuring our schools are high quality and inclusive. An orderly closure of the school would enable all children to transition to alternative Ofsted "Good" or "Outstanding" schools in the locality, honouring the right to a good education for all pupils presently and potentially attending the school. The reduction in pupil places that would result following the closure would contribute to reduction of surplus places in the local area.
- 27. By reducing school capacity both locally and borough wide, the council will help to ensure that schools remain viable, standards are maintained and improved, and that parents and carers still have a choice of good or outstanding schools for their children.
- 28. The statutory process to close a school is set out in the department for education's statutory guidance document '*Opening and closing maintained schools statutory guidance for proposers and decision-makers'* (2019). The process includes five stages as follows:
 - Stage one Consultation
 - Stage two Publication
 - Stage three Representation
 - Stage four Decision
 - Stage five Implementation
- 29. This report is seeking agreement to proceed with **Stage one** a consultation on the proposal to close Comber Grove school. The consultation will run for six weeks exclusive of school holidays.
- 30. All key stakeholders in the community will be invited to participate through attending in person and online meetings as well as providing written feedback if preferred. A detailed draft timetable is attached as Appendix 2 of the report.
- 31. At the end of the consultation period, the cabinet member will be presented with the results of the consultation and will then consider via the IDM process once more approving the publication of proposals. This would be stage two of the process. This would involve the publication of formal notices of the proposed closure in the local press and on the school or council website. Responses during this process form Stage three of the process.
- 32. The results of this and the previous consultation would then be combined in a report and this will be submitted to the council's cabinet for decision. This forms Stage four of the process. If the decision is taken to close the school this would be Stage five of the process.

Risks

- 33. There is a risk of referral to the Office of the School's Adjudicator (OSA) if the local authority does not make a decision within a period of 2 months of the end of the representation period (Stages 3). Where this happens, the local authority must, within a week of the end of that 2 month period, refer the case to the schools adjudicator.
- 34. In addition to the right to make a referral to the School Adjudicator above, the following bodies also has a right to make referral to the School Adjudicator if they object to the determination/decision made by the local authority. Those able to object to this proposal are:
 - 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 specified in the proposals.
- 35. If a formal objection to the proposal/decision is made by any of the three bodies outlined in paragraph 35 the entire process could be delayed requiring the school to remain open until the proposal was considered and, if refused, beyond this time. This is considered to be low risk as there is no obvious dis-benefit to any schools in the relevant categories.
- 36. There is a very small risk that reducing school capacity prior to any future increase in demand could potentially leave the council vulnerable to legal action for not meeting its target duty to provide sufficient primary school places. The Education Act 1996 places a duty on local authorities to "secure that there are sufficient primary [...] school places in their area as well as working to [...] increase] opportunities for parental choice". However, the large level of vacancies and compact nature of Southwark's geography mitigate considerably against this risk.
- 37. Secretary of State for Education's approval is required for site closures and this could alert them to a vacant site that could be used for a free school. Were a free school to open on the Comber Grove site, all the work in reducing capacity could be negated as a new school of the same or greater capacity could be opened, meaning the capacity deleted was unnecessarily reprovided. This will be mitigated by the council making a proposal to the Secretary of State that we intend to repurpose the buildings for other educational use.

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

Community impact statement

38. The Public Sector Equality Duty, 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 as an employer. Public bodies need to have due regard to the need to eliminate discrimination, advance equality of opportunity, and foster good relations between people with protected characteristics and those with none when carrying out their activities.

Equalities (including socio-economic) impact statement

- 39. The council's "*Approach to Equality*" commits the council to ensuring equality is an integral part of our daily business. "Protected characteristics" are the grounds upon which discrimination is unlawful these 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 civil partnership, pregnancy and maternity, and sexual orientation are unlikely to be issues to consider in the context of a school closure.
- 40. An equality impact statement has been completed for this proposal and is attached as Appendix 1. Potential negative impacts in terms of equalities were identified as regards Disability Special Educational Needs (SEND). If the school closes, then the LA will work with children displaced by the closure to find an appropriate placement at the numerous schools with vacancies local to where they live, including those with EHCPs or classified as SEND plus. Individual support will be provided to children with disabilities including reviewing Education, Health and Care Plans and discussing transition arrangements between schools. No other differential negative impacts have been identified, so no further mitigating or improvement actions are proposed in this category
- 41. No negative impacts in terms of equalities including socio-economic were identified in respect of other protected characteristics, and therefore no mitigations were required,
- 42. The same approach will be used for Comber Grove individual support is being provided to children with disabilities including reviewing Education, Health and Care Plans and discussing transition arrangements between schools. No other differential negative impacts have been identified, so no further mitigating or improvement actions are proposed in this category

Health impact statement

43. As mentioned above, an equality impact statement has been completed for this proposal and is attached as Appendix 1. No negative impacts in terms of

health were identified, and therefore no mitigations were required.

Climate change implications

- 44. 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.
- 45. This report has not directly considered the impact of climate change in the main body of the report, as the recommendation will have a minimal effect on climate change. As the numbers of pupils in the authority area falls, and the numbers of pupils attending schools reduce, then it is likely that less pupils will be travelling to schools, thereby potentially reducing car use, travel and carbon emissions overall.
- 46. 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.
- 47. Reducing the number of school places will not directly enhance the environment and green space, nor will it create "green" jobs and businesses, or benefit sustainable energy or reduce waste, albeit that less pupils in a particular school could potentially use less energy and produce less waste.
- 48. Therefore, there is no expected substantive negative climate change effect arising from this proposal.

Resource implications

- 49. Surplus capacity in primary schools as a result of falling rolls impacts on school budgets and the resources available for education.
- 50. It is proposed that the current school site could be re-purposed for other educational or community use to meet local needs. This would also reduce the risk of the vacant education site being used for a future free school, at the Secretary of State's discretion. The creation of a new free school would create additional places in Southwark and have the knock on effect of increasing the already significant surplus capacity within the primary school sector.

Legal implications

- 51. The council's general duty in relation to securing sufficient school places in its area, and its functions in relation to making alterations to its existing maintained schools, is described in the body of the report.
- 52. Where the council is considering a proposal to close a maintained school, the lead member is reminded that certain proposals will be subject to statutory notification and consultation procedures under Education and Inspections Act

2006, and regulations and guidance issued under that that Act.

53. The lead member is also reminded that the public sector equality duty under section 149 Equality Act 2010, as set out in the community impact section of the report, applies to the exercise any of its functions. In line with Equality and Human Rights Commission guidance, an equality and health analysis has been undertaken to indicate the extent of any impact on those with protected characteristics.

Financial implications

- 54. The Dedicated Schools Grant (DSG) Schools Block, which is allocated to fund education provision in mainstream state funded schools, is primarily calculated using pupil numbers and pupil characteristics. As it is stated in paragraph 16 the pupil numbers in Comber Grove are expected to fall in the next 5 years.
- 55. Comber Grove Primary ended the 2022-23 financial year with a cumulative deficit of £20k. This is expected to rise significantly due to the failing pupil numbers if he school remains open therefore it is important that decisive and timely action is taken.
- 56. It is also estimated that the closure will also incur costs such as redundancies, site security, and uniforms for children transferring to other schools, archiving/disposal etc. In order to minimize 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.

Consultation

- 57. When it is proposed to close or amalgamate a maintained school the statutory consultation procedures defined by the DfE are required to be undertaken. This process is outlined in Appendix 2, involving a mixture of formal and informal consultation processes that needs to be carried out by the local authority and Governing Body. Initially, this involves ensuring all stakeholders are informed of the proposals and plans to follow a statutory consultation process. Cabinet member approval is required to initiate the statutory consultation process which runs for six weeks during term time.
- 58. Consultation will include meetings with parents/carers, staff, trade unions and governors, as well as writing to local MPs, the Southwark Diocesan Board of Education and RC Education Commission, and neighbouring authorities to elicit their views on the proposed closure.
- 59. All comments obtained through the statutory consultation process will be considered, the lead member will then be asked whether to proceed with the closure proposal. At this stage, formal notices would be issued, and the consultees (as above), as well as the general public would be invited to consider the proposals put forward to close the school.

60. The final decision to close Comber Grove School rests with the council's Cabinet. If this is agreed, Comber Grove School will close on the 31 August 2024.

SUPPLEMENTARY ADVICE FROM OTHER OFFICERS

Assistant Chief Executive - Governance and Assurance

- 61. This report seeks the agreement of the cabinet member to commence a statutory consultation under the Education and Inspections Act 2006. The intention in these proposals is to seek to close a school.
- 62. In this case the proposal is to close Comber Grove School for the reasons set out in the report and to facilitate an orderly transfer of existing pupils from Comber Grove to other schools.
- 63. This is one of the options available when seeking to close a school as set out in the DfE statutory guidance "*Opening and Closing Maintained Schools*". The cabinet member is empowered to take this executive decision in accordance with part 3D of the constitution.
- 64. Where the council is carrying out any consultation, in accordance with the Gunning principles it is important that the material provided to consultees will include sufficient information to enable "intelligent consideration", that the council will give adequate time for those responses, and ensure that the results of the consultation are properly considered and taken into account before deciding whether to proceed to issue statutory notices.
- 65. The general duty on the council to ensure a sufficiency of school places has been referred to in the body of the report.
- 66. The cabinet member is reminded that the council, in the exercise of all its functions, must have due regard (section 149 Equality Act 2010) to the need to (a) eliminate discrimination, harassment, victimisation or other prohibited conduct, (b) to advance equality of opportunity and (c) foster good relations between persons who share a relevant protected characteristic and those who do not share it. An equality impact analysis has been completed which the cabinet member should take into account when making her decision on this report.

Strategic Director of Finance Ref: [CAS23/35]

67. The Strategic Director of Finance notes the proposal to commence consultation on the proposal to close Comber Grove Primary School from 31 August 2024. 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.

- 68. In the case of Comber Grove 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.
- 69. Schools in financial difficulty contribute to wider financial stresses across all maintained schools and so it is important that the financial position of all schools are reviewed regularly to ensure they are living within their means.
- 70. 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. Whilst the responsibility for the financial management of the school rests with the governing body, the ultimate responsibility of maintained schools rests with the Council 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.

Other officers

71. No other officers were required to provide a concurrent for this report.

BACKGROUND DOCUMENTS

Background Papers	Held At	Contact
Opening and closing maintained schools - Statutory guidance for	Services, 160 Tooley	Ric Euteneuer 07925 637558
proposers and decision-makers January 2023	SE1 2QH	
https://assets.publishing.service.g		
achment_data/file/851585/Openin	ig and closing maintaine	ed_schools1012.pdf
Making significant changes		Ric Euteneuer
('prescribed alterations') to	Services, 160 Tooley	07925 637558
5	Street, London,	
guidance for proposers and	SE1 2QH	
decision-makers January 2023		
https://assets.publishing.service.g	ov.uk/government/upload	ls/system/uploads/att
achment_data/file/756572/Mainta	ined_schools_prescribed_	alterations guidanc
<u>e.pdf</u>		
School Admissions Code -	Children and Adult	Ric Euteneuer
Statutory guidance for admission	Services, 160 Tooley	07925 637558
authorities, governing bodies,	Street, London,	
local authorities, schools'	SE1 2QH	
adjudicators and admission		
appeals panels. DfE 2021		

Background Papers	Held At	Contact
https://assets.publishing.service.g		
ttachment_data/file/1001050/Scho	ool_admissions_code_20	21.pdf
Pupil Places Planning Report 2022, Southwark Council, October 2022	Children and Adult Services, 160 Tooley Street, London, SE1 2QH	Ric Euteneuer 07925 637558
https://moderngov.southwark.gov	.uk/documents/s109543/F	Report%20Annual%2
0School%20Place%20Planning.p		
Keeping Education Strong Strategy - Strategy for future proofing primary schools and protecting the quality of education in Southwark	Services, 160 Tooley	Ric Euteneuer 07925 637558
https://moderngov.southwark.gov	.uk/documents/s110486/A	<u>ppendix%201%20</u>
Place%20planning%20across%20		%20Schools%20A
%20strategy%20for%20future-%2		
Keeping Education Strong Recommendations, Southwark Council, June 2023	Children and Adult Services, 160 Tooley Street, London, SE1 2QH	Ric Euteneuer 07925 637558
https://moderngov.southwark.gov	.uk/documents/s114705/F	Report%20Keeping
%20Education%20Strong.pdf		
The Essential Guide to the Public Sector Equality Duty – EHRC July 2014	Children and Adult Services, 160 Tooley Street, London, SE1 2QH	Ric Euteneuer 07925 637558
https://www.equalityhumanrights.		d_essential_guide_
Equalities Act 2010	Children and Adult Services, 160 Tooley Street, London, SE1 2QH	Ric Euteneuer 07925 637558
Link: https://www.equalityhumanri		guidance/public-
sector-equality-duty		
Integrated Communities Government Action Plan, February 2019	Children and Adult Services, 160 Tooley Street, London, SE1 2QH	Ric Euteneuer 07925 637558
https://assets.publishing.service.g		
ttachment_data/file/778045/Integr lan.pdf	ated Communities Strate	egy Govt Action P
Managing Surplus School Places in London (2023) – London Councils	Children and Adult Services, 160 Tooley Street, London, SE1 2QH	Ric Euteneuer 07925 637558

Background Papers	Held At	Contact			
https://www.londoncouncils.gov.uk/our-key-themes/children-and-young- people/education-and-school-places/managing-surplus-school-places					
Southwark's Borough Plan		Ric Euteneuer 07925 637558			
Link: https://www.southwark.gov.uk/council-and-democracy/fairer- future/council-plan					

APPENDICES

No.	Title
Appendix 1	Equality Impact and Needs Assessment
Appendix 2	Decision Flow Chart
Appendix 3	Map of location of Comber Grove Primary School

AUDIT TRAIL

Lead Officer	David Quirke-	Thornton	David Quirke-Thornton			
			ult Services			
Report Author	Strategic Director of Children and Adult Services					
Report Aution	Ric Euteneuer					
	Principal Strategy Officer (School Place Planning)					
Version	Final					
Dated	20 September	r 2023				
	-					
Key Decision?	Yes					
CONSULTATION WITH OTHER OFFICERS / DIRECTORATES /						
CABINET MEMBER						
Officer	Title	Comments Sought	Comments Included			
Assistant Chief E	xecutive	Yes	Yes			
Governance and	Governance and Assurance					
Strategic Director	of	Yes	Yes			
Finance						
Cabinet Member		Yes	No			
Date final report s	ent to Constitu	tional Team	26 September 2023			