

Cabinet

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Additional Information

Contact: Douglas Campbell (Telephone 07779 413886),
email: committeeservices@swindon.gov.uk

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TREASURY MANAGEMENT STRATEGY 2020/21

Appendix 1 - Treasury Management Strategy 2020/21

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Appendix 1 - Treasury Management Strategy 2020/21

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1 Current Portfolio Position

- 1.1 The capital expenditure plans set out in Annex 1 to Appendix 1 summarises the Council's current and future plans. The treasury management function ensures that the Council's cash is organised in accordance with the relevant professional codes, so that sufficient cash is available to meet this service activity and the Council's capital strategy. This will involve both the organisation of the cash flow and, where capital plans require, the organisation of appropriate borrowing facilities. The strategy covers the relevant treasury / prudential indicators, the current and projected debt positions and the annual investment strategy.
- 1.2 The Council's actual treasury portfolio position at 31 March 2019, with December 2019 actuals are summarised below.

TREASURY PORTFOLIO				
Treasury investments	actual 31.3.19 £m	actual 31.3.19 %	current 31.12.19 £m	current 31.12.19 %
UK Banks	15.0	33%	0.0	0%
Local authorities	15.5	34%	17.0	40%
Call Accounts	0.0	0%	10.0	24%
Total managed in house	30.5	67%	27.0	64%
Property funds	15.2	33%	15.0	36%
Total managed externally	15.2	33%	15.0	36%
Total treasury investments	45.7	100%	42.0	100%
Treasury long term external borrowing				
Local authorities	0.0	0%	0.0	0%
Other Financial Institutions	30.0	9%	30.0	9%
PWLB	296.3	91%	309.8	91%
Total external borrowing	326.3	100%	339.8	100%
Net treasury investments / (borrowing)	(280.6)		(297.8)	

- 1.3 The Council's Non Specified Treasury Investments are detailed below. The property fund is a non specified investment by virtue of the fact that it has a maturity profile of greater than 1 year, it is included in both the table above showing Treasury Portfolio as well as the table below.

Non Specified Treasury Investments	Sum Invested (£m)
Local Authority Property Fund	15.000
Local Charity	0.033

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Cabinet Approved Loans & Investments to wholly owned companies and joint ventures	Loan Limit (£m)	Loan Value 31.03.19 (£m)	Loan Value 31.12.19 (£m)	Share Capital (£)
Public Power Solutions Ltd.	15.0	8.9	9.7	100
Swindon Chapel Farm Solar Plc.	3.0	2.9	2.9	50,000
Swindon Common Farm Solar CIC Plc.	3.0	2.9	2.8	50,000
Swindon Housing (Rent) Co. Ltd.				100
Swindon Housing Development Co. Ltd.	15.0	0.6	5.1	1,000
Wichelstowe Joint Venture	15.0	0.3	2.4	1
Total Cabinet Approved Loans & Investments	51.0	15.6	22.9	101,201

- 1.4 The Council's actual Non-Treasury Investment portfolio position at 31 March 2019, with December 2019 actuals are summarised below.

Non-Treasury investments	actual 31.3.19 £m	current 31.12.19 £m
No of Properties	1	1
Property Acquisition Price	7.9	7.9
Amount Funded through borrowing	0.0	0.0
Average investment return before financing costs	7.5%	7.5%
Total investment income as a proportion of the Councils Net General Fund budget	0.4%	0.4%
Investment borrowing as a proportion of total external debt as measured by the Capital Financing Reserve (excl. lease liabilities and HRA)	0.0%	0.0%
Fair value of property investments as a proportion of all Council property assets (excl. HRA)	1.6%	1.6%

- 1.5 A number of investments detailed in the 2018/19 strategy have been reclassified as economic regeneration, in accordance with accounting policies and therefore have been removed from the above table.
- 1.6 The Council's forward projections for borrowing are summarised below. The table shows the actual external debt, against the underlying capital borrowing requirement, (the Capital Financing Requirement or "CFR"), highlighting any over or under borrowing.

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CAPITAL FINANCING REQUIREMENT						
	2019/20 (£m)	2020/21 (£m)	2021/22 (£m)	2022/23 (£m)	2023/24 (£m)	2024/25 (£m)
CFR excl. PFI b/fwd. 1 April	428.2	451.3	473.4	497.4	532.1	532.8
PFI liabilities	49.6	47.6	45.5	43.1	40.5	37.6
CFR incl. PFI	477.8	498.9	518.9	540.5	572.6	570.4
Add Capital Expenditure funded through borrowing	29.9	29.5	32.3	44.8	11.3	1.9
Less MRP (debt repayment)	(6.8)	(7.4)	(8.3)	(10.1)	(10.6)	(10.8)
Underlying Borrowing Requirement	451.3	473.4	497.4	532.1	532.8	523.9
PFI Liabilities	47.6	45.5	43.1	40.5	37.6	34.3
CFR c/fwd. 31 March	498.9	518.9	540.5	572.6	570.4	558.2
External Borrowing b/fwd. 1 April	(326.2)	(336.8)	(363.3)	(379.3)	(433.9)	(449.5)
Loan Maturities	1.5	11.9	11.8	13.2	14.9	15.6
New Loans	(12.1)	(38.4)	(27.8)	(67.8)	(30.5)	(31.2)
External Borrowing c/fwd. 31 March	(336.8)	(363.3)	(379.3)	(433.9)	(449.5)	(465.1)
Under / (Over) Borrowing	114.5	110.1	118.1	98.2	83.3	58.8
<i>Under borrowing as a % of Underlying Borrowing Requirement (excludes PFI)</i>	25%	23%	24%	18%	16%	11%
Net Investments c/fwd.	(45.0)	(40.0)	(40.0)	(40.0)	(40.0)	(40.0)

- 1.7 Within the range of prudential indicators there are a number of key indicators to ensure that the Council operates its activities within well-defined limits. One of these is that the Council needs to ensure that its gross debt does not, except in the short term, exceed the total of the CFR in the preceding year plus the estimates of any additional CFR for 2020/21 and the following two financial years. This allows some flexibility for limited early borrowing for future years, but ensures that borrowing is not undertaken for revenue or speculative purposes.
- 1.8 The Corporate Director of Finance and Assets reports that the Council complied with this prudential indicator in the current year and does not envisage difficulties for the future. This view takes into account current commitments, existing plans, and the proposals in this budget report.

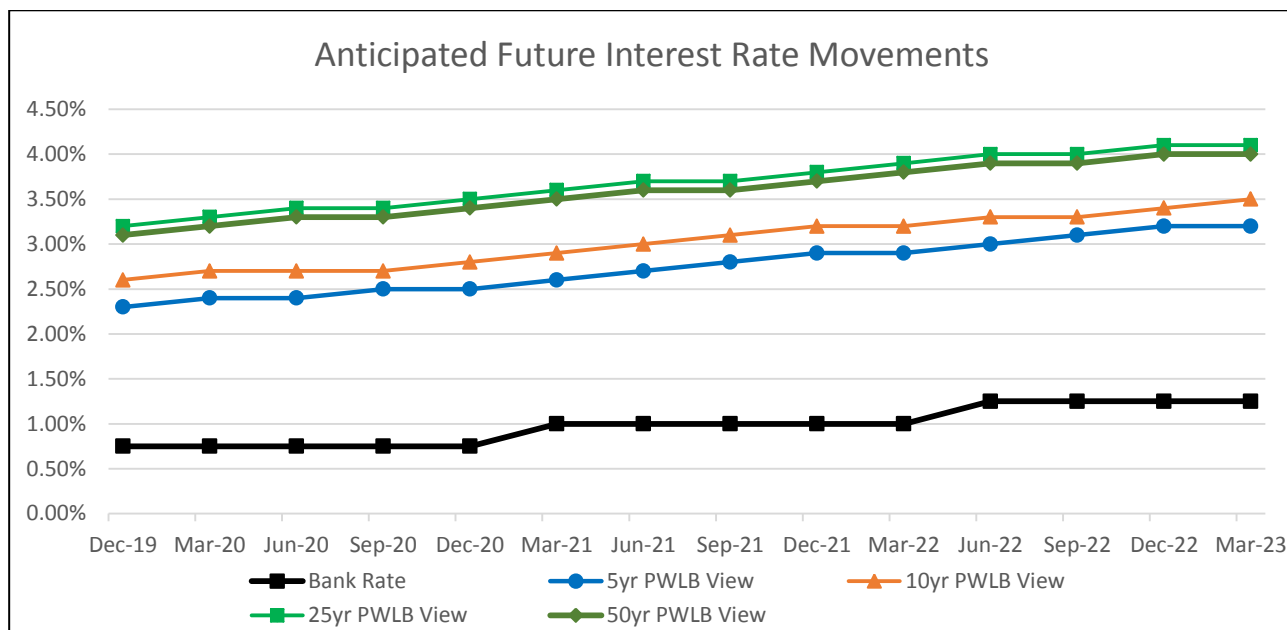
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2 Prospects for Interest Rates

- 2.1 The Council has appointed Link Asset Services as its treasury advisor and part of their service is to assist the Council to formulate a view on interest rates. The following table gives the Link view on interest rate movements.



- 2.2 The Monetary Policy Committee (MPC) left Bank Rate unchanged at 0.75% during 2019. There is still some residual risk that the MPC could cut Bank Rate as the UK economy is still likely to only grow weakly in 2020. Until that uncertainty is removed, it is unlikely that the MPC would raise Bank Rate.
- 2.3 The overall longer run future trend is for gilt yields, and consequently PWLB rates, to rise, albeit gently. From time to time, gilt yields, and therefore PWLB rates, can be subject to exceptional levels of volatility due to geopolitical, sovereign debt crisis, emerging market developments and sharp changes in investor sentiment. Such volatility could occur at any time during the forecast period.
- 2.4 In addition, PWLB rates are subject to decisions by H.M. Treasury to change the margin over gilt yields charged in PWLB rates: such changes could be up or down. It is not clear that if gilt yields were to rise back up again by over 100bps within the next year or so, whether H M Treasury would remove the extra 100 bps margin implemented on 9.10.19.
- 2.5 Economic and interest rate forecasting remains difficult with so many influences weighing on UK gilt yields and PWLB rates. The above forecasts, (and MPC decisions), will be liable to further amendment depending on how economic data and developments in financial markets transpire over the next year. Geopolitical developments, especially in the EU, could also have a major impact. Forecasts for average investment earnings beyond the three-year time horizon will be heavily dependent on economic and political developments.

Further information on the subject of this report can be obtained from Ian Burbidge on Direct Dial No. 07769 281641 or Email iburbidge@swindon.gov.uk

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2.6 In summary:

- Investment returns are likely to remain low during 2020/21 with little increase in the following two years. However, if major progress was made with an agreed future relationship with the EU, then there is upside potential for earnings.
- Borrowing interest rates were on a major falling trend during the first half of 2019-20 but then jumped up by 100 bps on 9.10.19. The policy of avoiding new borrowing by running down spare cash balances has served well over the last few years. However, the unexpected increase of 100 bps in PWLB rates requires a major rethink of local authority treasury management strategy and risk management.
- While this authority will not be able to avoid borrowing to finance new capital expenditure, to replace maturing debt and the rundown of reserves, there will remain a cost of carry to any new long-term borrowing that causes a temporary increase in cash balances as this position will, most likely, incur a revenue cost – the difference between borrowing costs and investment returns.

3 Minimum Revenue Provision Policy Statement

- 3.1 The Council is required to pay off an element of the accumulated General Fund capital spend each year (the CFR) through a revenue charge (the minimum revenue provision - MRP), although it is also allowed to undertake additional voluntary payments if required (voluntary revenue provision - VRP).
- 3.2 MHCLG regulations have been issued which require the full Council to approve an MRP Statement in advance of each year. A variety of options are provided to councils, so long as there is a prudent provision. The Council is recommended to approve the following MRP Statement:
- *For capital expenditure incurred before 1 April 2008 or which in the future will be Supported Capital Expenditure, the MRP will be based on the CFR as per the regulatory method in the MRP guidance. This option provides for an approximate 4% reduction in the borrowing need (CFR) each year.*
 - *From 1 April 2008 for all unsupported borrowing the MRP will be based on the estimated life of the assets, on an annuity basis, in accordance with the regulations. Annuity method charges will be calculated using the relevant PWLB annuity rates for the estimated asset lives as at 31 March in the year of expenditure. MRP charges commence the year after the asset becomes operational.*
 - *MRP will be deferred in relation to capital expenditure funded through borrowing where there is an intention to repay the borrowing from future receipts and where there is a strong likelihood that this will happen. Should*

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there be a shortfall between the debt and eventual receipts, the balance will incur an annual MRP charge.

- MRP Overpayments - A change introduced by the revised MHCLG MRP Guidance was the allowance that any charges made over the statutory minimum revenue provision (MRP), voluntary revenue provision (VRP) or overpayments, can, if needed, be reclaimed in later years if deemed necessary or prudent. In order for these sums to be reclaimed for use in the budget, this policy must disclose the cumulative overpayment made each year. Up until the 31 March 2020 it is not anticipated that any VRP overpayments will be made, the Council will apply this policy as required in future years.*
- For PFI contracts MRP will be based on the estimated life of the assets, on an annuity basis, in accordance with the regulations. Annuity method charges will be calculated based on the PWLB annuity rates at 31st March in the year that the assets became operational.*
- Where non-ring-fenced capital receipts are available, these can be applied to meet the cost of PFI liability repayment (or part thereof). Where capital receipts are applied in this manner, the MRP charge for the PFI would be reduced by an equal amount in that year.*
- For any future finance leases the MRP requirement would be met by a charge equal to the element of the charge applied to write down the liability.*

- 3.3 No revenue charge is currently required for the HRA, although the existing voluntary policy is to repay £5m per annum.

4 Borrowing Strategy

- 4.1 The Council is currently maintaining an under-borrowed position. This means that the amount of long-term loans required exceeds the actual level of long term loans taken out. Long term loans are required to fund capital expenditure which Council has approved as “funded through borrowing”, but there is a timing difference between when the expenditure is made and when the long term loan is taken out. The timing of the taking of long term loans is part of the wider cash management strategy.
- 4.2 The difference between long term borrowing required and what has actually been taken out is known as “Internal Borrowing” and represents the temporary use of cash reserves and working capital to bridge the timing difference. As cash from reserves and working capital is currently invested at historically low rates, then the policy of delaying long-term borrowing and using existing cash balances as an interim measure is currently a cheaper option for the Council.

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- 4.3 While the council will maintain an under borrowed position on the General Fund (the HRA is fully borrowed up to the CFR), future movements in interest rates will dictate the future policy and the timing of taking out long-term loans, and will be kept under careful review.
- 4.4 Against this background and the risks within the economic forecast, caution will continue to be adopted with the 2020/21 treasury operations. The Corporate Director of Finance and Assets will monitor interest rates in financial markets and adopt a pragmatic approach to changing circumstances:
- If it was felt that there was a significant risk of a sharp FALL in long and short term rates (e.g. due to a marked increase of risks around relapse into recession or of risks of deflation), then long term borrowings will be postponed, and potential rescheduling from fixed rate funding into short term borrowing will be considered.
 - If it was felt that there was a significant risk of a much sharper RISE in long and short term rates than that currently forecast, perhaps arising from an acceleration in the rate of increase in central rates in the USA and UK, an increase in world economic activity or a sudden increase in inflation risks, then the portfolio position will be re-appraised. Most likely, fixed rate funding will be drawn whilst interest rates are lower than they are projected to be in the next few years.
- 4.5 Any borrowing decisions will be reported to the Audit Committee as part of the annual cycle of reports.

Borrowing in Advance of Need

- 4.6 The Council will not borrow more than or in advance of its needs, purely in order to profit from the investment of the extra sums borrowed. Any decision to borrow in advance will be within forward approved Capital Financing Requirement estimates, and will be considered carefully to ensure that value for money can be demonstrated and that the Council can ensure the security of such funds.

Loan Re-scheduling

- 4.7 Opportunities from rescheduling loans to generate savings will be monitored through the year but need to be considered in the light of the current treasury position and the size of the cost of debt repayment (premiums incurred).
- 4.8 The reasons for any rescheduling to take place will include:
- The generation of cash savings and / or discounted cash flow savings;
 - Helping to fulfil the treasury strategy;
 - Amending the balance of the portfolio (amend the maturity profile and/or the balance of volatility).

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- 4.9 Consideration will also be given to identify if there is any residual potential for making savings by running down investment balances to repay debt prematurely as short term rates on investments are likely to be lower than rates paid on current debt.
- 4.10 All rescheduling will be reported to the Cabinet at the earliest meeting following its action.

New financial institutions as a source of borrowing and / or types of borrowing

- 4.11 Following the decision by the PWLB on 9 October 2019 to increase their margin over gilt yields by 100 bps to 180 basis points on loans lent to local authorities, consideration will also need to be given to sourcing funding at cheaper rates from the following:
- Local authorities (primarily shorter dated maturities)
 - Financial institutions (primarily insurance companies and pension funds but also some banks, out of spot or forward dates)
 - Municipal Bonds Agency
- 4.12 The degree which any of these options proves cheaper than PWLB Certainty Rate is still evolving at the time of writing and will be kept under review.

5 Investment Policy, Creditworthiness Policy and Investment Strategy

Investment Policy

- 5.1 The MHCLG and CIPFA have extended the meaning of ‘investments’ to include both financial and non-financial investments. This report deals solely with financial investments, (as managed by the treasury management team). Non-financial investments, essentially the purchase of income yielding assets, are covered in the Capital Strategy, (this forms part of the Capital Report elsewhere on this agenda).
- 5.2 The Council’s investment policy has regard to the following: -
- MHCLG’s Guidance on Local Government Investments (“the Guidance”)
 - CIPFA Treasury Management in Public Services Code of Practice and Cross Sectoral Guidance Notes 2017 (“the Code”)
 - CIPFA Treasury Management Guidance Notes 2018
- 5.3 The Council’s investment priorities will be security first, portfolio liquidity second and then yield, (return).
- 5.4 The above guidance from the MHCLG and CIPFA place a high priority on the management of risk. This authority has adopted a prudent approach to managing risk and defines its risk appetite by the following means: -

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- Minimum acceptable credit criteria are applied in order to generate a list of highly creditworthy counterparties. This also enables diversification and thus avoidance of concentration risk. The key ratings used to monitor counterparties are the short term and long-term ratings.
 - **Other information:** ratings will not be the sole determinant of the quality of an institution; it is important to continually assess and monitor the financial sector on both a micro and macro basis and in relation to the economic and political environments in which institutions operate. The assessment will also take account of information that reflects the opinion of the markets. To achieve this consideration the Council will engage with its advisors to maintain a monitor on market pricing such as “**credit default swaps**” and overlay that information on top of the credit ratings.
 - **Other information sources** used will include the financial press, share price and other such information pertaining to the banking sector in order to establish the most robust scrutiny process on the suitability of potential investment counterparties.
- 5.5 This authority has defined the list of **types of investment instruments** that the treasury management team are authorised to use. There are two lists in Annex 2 under the categories of ‘specified’ and ‘non-specified’ investments.
- **Specified investments** are those with a high level of credit quality and subject to a maturity limit of one year.
 - **Non-specified investments** are those with less high credit quality, may be for periods in excess of one year, and/or are more complex instruments which require greater consideration by members and officers before being authorised for use. Once an investment is classed as non-specified, it remains non-specified all the way through to maturity i.e. an 18 month deposit would still be non-specified even if it has only 11 months left until maturity.
- 5.6 This authority has engaged **external consultants**, (see section 7), to provide expert advice on how to optimise an appropriate balance of security, liquidity and yield, given the risk appetite of this authority in the context of the expected level of cash balances and need for liquidity throughout the year.
- 5.7 All investments will be denominated in **sterling**.
- 5.8 As a result of the change in accounting standards for 2019/20 under IFRS 9, this authority will consider the implications of investment instruments which could result in an adverse movement in the value of the amount invested and resultant charges at the end of the year to the General Fund. (In November 2018, the Ministry of Housing, Communities and Local Government, [MHCLG], concluded a consultation for a temporary override to allow English local authorities time to adjust their portfolio of all pooled investments by announcing a statutory override to delay implementation of IFRS 9 for five years commencing from 1.4.18).

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- 5.9 Investment instruments identified for use in the financial year are listed in Annex 2 under the 'specified' and 'non-specified' investments categories. Counterparty limits will be as set through the Council's treasury management practices – schedules.
- 5.10 However, this authority will also pursue value for money in treasury management and will monitor the yield from investment income against appropriate benchmarks for investment performance. Regular monitoring of investment performance will be carried out during the year.

Creditworthiness Policy

- 5.11 This Council applies the creditworthiness service provided by Link Asset Services. This service employs a sophisticated modelling approach utilising credit ratings from the three main credit rating agencies - Fitch, Moody's and Standard and Poor's. The credit ratings of counterparties are supplemented with the following overlays:
- Credit watches and credit outlooks from credit rating agencies;
 - CDS spreads to give early warning of likely changes in credit ratings;
 - Sovereign ratings to select counterparties from only the most creditworthy countries.
- 5.12 This modelling approach combines credit ratings, credit Watches and credit Outlooks in a weighted scoring system which is then combined with an overlay of CDS spreads for which the end product is a series of colour coded bands which indicate the relative creditworthiness of counterparties. These colour codes are used by the Council to determine the suggested duration for investments.
- 5.13 The Link Asset Services' creditworthiness service uses a wider array of information than just primary ratings. Furthermore, by using a risk weighted scoring system, it does not give undue preponderance to just one agency's ratings.
- 5.14 Typically the minimum credit ratings criteria the Council use will be a Short Term rating (Fitch or equivalents) of F1 and a Long Term rating of A-. There may be occasions when the counterparty ratings from one rating agency are marginally lower than these ratings but may still be used. In these instances consideration will be given to the whole range of ratings available, or other topical market information, to support their use.
- 5.15 All credit ratings will be monitored daily. The Council is alerted to changes to ratings of all three agencies through its use of the Link Asset Services' creditworthiness service.
- If a downgrade results in the counterparty / investment scheme no longer meeting the Council's minimum criteria, its further use as a new investment will be withdrawn immediately.

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- In addition to the use of credit ratings the Council will be advised of information in movements in credit default swap spreads against the iTraxx European Financials benchmark and other market data on a daily basis via its Passport website, provided exclusively to it by Link Asset Services. Extreme market movements may result in downgrade of an institution or removal from the Council's lending list.

5.16 Sole reliance will not be placed on the use of this external service. In addition this Council will also use market data and market information, information on any external support for banks to help support its decision making process.

UK banks – ring fencing

5.17 The largest UK banks, (those with more than £25bn of retail / Small and Medium-sized Enterprise (SME) deposits), are required, by UK law, to separate core retail banking services from their investment and international banking activities by 1st January 2019. This is known as “ring-fencing”. Whilst smaller banks with less than £25bn in deposits are exempt, they can choose to opt up. Several banks are very close to the threshold already and so may come into scope in the future regardless.

5.18 Ring-fencing is a regulatory initiative created in response to the global financial crisis. It mandates the separation of retail and SME deposits from investment banking, in order to improve the resilience and resolvability of banks by changing their structure. In general, simpler, activities offered from within a ring-fenced bank, (RFB), will be focused on lower risk, day-to-day core transactions, whilst more complex and “riskier” activities are required to be housed in a separate entity, a non-ring-fenced bank, (NRFB). This is intended to ensure that an entity's core activities are not adversely affected by the acts or omissions of other members of its group.

5.19 While the structure of the banks included within this process may have changed, the fundamentals of credit assessment have not. The Council will continue to assess the new-formed entities in the same way that it does others and those with sufficiently high ratings, (and any other metrics considered), will be considered for investment purposes.

Country limits

5.20 The Council has determined that it will only use approved counterparties from the UK and countries with a minimum sovereign credit rating of AA- from Fitch (or equivalent). This list will be amended by officers should ratings change in accordance with this policy.

Investment Strategy

5.21 **In-house funds.** Investments will be made with reference to the core balance and cash flow requirements and the outlook for short-term interest rates (i.e. rates for investments up to 12 months). Greater returns are usually obtainable by investing for longer periods. While most cash balances

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are required in order to manage the ups and downs of cash flow, where cash sums can be identified that could be invested for longer periods, the value to be obtained from longer term investments will be carefully assessed.

Investment returns expectations

- 5.22 On the assumption that the UK and EU agree a Brexit deal including the terms of trade by the end of 2020 or soon after, then Bank Rate is forecast to increase only slowly over the next few years to reach 1.00% by quarter 1 2023. Bank Rate forecasts for financial year ends (March) are:

Q1 2021	0.75%
Q1 2022	1.00%
Q1 2023	1.00%

- 5.23 The suggested budgeted investment earnings rates for returns on investments placed for periods up to about three months during each financial year are as follows:

2019/20	0.75%
2020/21	0.75%
2021/22	1.00%
2022/23	1.25%
2023/24	1.50%
2024/25	1.75%
Later years	2.25%

Investment Periods

- 5.24 **Specified Investment** periods are currently restricted to no longer than 24 months. Lending to counterparties is in line with the creditworthiness policy detailed above and recommended by Link and these are limited to a total of £20m. Any investments to banks and building societies for a period in excess of 365 days would be classed as a “non-specified investment” as detailed in Annex 2 to this strategy.
- 5.25 **Non Specified Investments** are limited to a maximum of £10m for any one counterparty, however investments in the Local Authority Property Fund or any similar multi asset fund may exceed this limit. These investments will be subject to a specific Cabinet approval before they are undertaken.
- 5.26 The Council balances held in our current account and outside the list of treasury investments are simply for transactional purposes and not active investments. These will be kept as close to a minimum as Council cash flow allows.” These balances will fluctuate on a daily basis and this fluctuation is

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managed by the use of short term deposit / instant access accounts. These balances will be will not exceed £20m.

- 5.27 There may be occasions where the Council has investments with Lloyds which, in addition to the operational bank account, will exceed the £20m threshold per counterparty. The overall deposits with Lloyds will therefore be limited to a maximum of £40m.
- 5.28 The maximum amount the council will invest for more than 1 year is set out in the table below;

Maximum principal sums invested > 365 days					
2019/20	2020/21	2021/22	2022/23	2023/24	2024/25
£20m	£20m	£20m	£20m	£20m	£20m

Investment risk benchmarking

- 5.29 This Council will use an investment benchmark to assess the investment performance of its investment portfolio of 3 month LIBOR. At the end of the financial year, the Council will report on its investment performance as part of its Annual Treasury Report.

6 Policy on the use of external service providers

- 6.1 The Council uses Link Asset Services, Treasury solutions as its external treasury management advisors.
- 6.2 The Council recognises that responsibility for treasury management decisions remains with the organisation at all times and will ensure that undue reliance is not placed upon the services of our external service providers. All decisions will be undertaken with regards to all available information, including, but not solely, our treasury advisers.
- 6.3 It also recognises that there is value in employing external providers of treasury management services in order to acquire access to specialist skills and resources. The Council will ensure that the terms of their appointment and the methods by which their value will be assessed are properly agreed and documented, and subjected to regular review.

Annexes

- Annex 1 - Prudential Indicators.
- Annex 2 - Credit and Counterparty Risk Management, Specified and Non-Specified Investments

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Annex 1 – The Capital Prudential Indicators 2020/21 – 2024/25

1 The Council's capital expenditure plans are a key driver of treasury management activity. The outputs from capital expenditure plans are reflected in prudential indicators, which are designed to assist the Members overview and confirm capital expenditure plans.

2 Capital expenditure

2.1 This prudential indicator is a summary of the Council's capital expenditure plans, both those agreed previously, and those forming part of this budget cycle. Members are asked to approve the capital expenditure forecasts:

Capital Expenditure projections	Spend to 2018/19	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25	Total Programme
	(£m)	(£m)	(£m)	(£m)	(£m)	(£m)	(£m)	(£m)
General Fund Approved	112.4	102.8	81.0	26.5	40.6			363.3
General Fund New			15.9	13.6	9.9	16.6	7.2	63.2
HRA Approved	35.6	19.7	21.1	11.1	6.1			93.6
HRA Estimated New			15.0	15.0	15.0	15.0	15.0	75.0
Total	148.0	122.5	133.0	66.2	71.6	31.6	22.2	595.1

2.2 Other long-term liabilities - The above financing need excludes other long-term liabilities, such as PFI and leasing arrangements that already include borrowing instruments.

2.3 The figures in this indicator (General Fund approved £363.3m, HRA approved £93.6m, Total £456.9m) represent the level of current scheme approvals as reported to Cabinet in December 2019 as part of the quarterly capital monitoring process (Including new schemes agreed at that meeting). Figures in the "general fund new (£63.2m)" row represent proposed approvals for Council in February 2020. These represent total approvals, irrespective of funding source. Figures in the "HRA estimated new (£75m)" represent the annual capital expenditure in the HRA maintenance and new build programme.

3 The Council's borrowing need (the Capital Financing Requirement)

3.1 The second prudential indicator is the Council's Capital Financing Requirement (CFR). The CFR is simply the total historic outstanding capital expenditure which has not yet been paid for from either revenue or capital resources. It is essentially a measure of the Council's indebtedness and so it's underlying borrowing need. Any capital expenditure above, which has not immediately been paid for through a revenue or capital resource, will increase the CFR.

Further information on the subject of this report can be obtained from Ian Burbidge on Direct Dial No. 07769 281641 or Email iburbidge@swindon.gov.uk

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- 3.2 The CFR does not increase indefinitely, as the minimum revenue provision (MRP) is a statutory annual revenue charge which broadly reduces the indebtedness in line with each assets life, and so charges the economic consumption of capital assets as they are used.
- 3.3 The CFR includes any other long-term liabilities (e.g. PFI schemes, finance leases). Whilst these increase the CFR, and therefore the Council's borrowing requirement, these types of scheme include a borrowing facility by the PFI lease provider and so the Council is not required to separately borrow for these schemes. The Council currently has £49.6m (as at 1 April 2019) of such schemes within the CFR.
- 3.4 The Council is asked to approve the CFR projections below. Details of the Council's projections for actual external debt compared to the CFR are contained in the main Strategy. Note the figures are estimates, not commitments.

CAPITAL FINANCING REQUIREMENT						
General Fund Projections	2019/20 (£m)	2020/21 (£m)	2021/22 (£m)	2022/23 (£m)	2023/24 (£m)	2024/25 (£m)
CFR excl. PFI b/fwd. 1 April	319.2	347.3	374.4	403.4	440.1	445.8
PFI liabilities	49.6	47.6	45.5	43.1	40.5	37.6
CFR incl. PFI	368.8	394.9	419.9	446.5	480.6	483.4
Add Capital Expenditure funded through borrowing	29.9	29.5	32.3	41.8	11.3	1.9
Less MRP (debt repayment)	(1.8)	(2.4)	(3.3)	(5.1)	(5.6)	(5.8)
Underlying Borrowing Requirement	347.3	374.4	403.4	440.1	445.8	441.9
PFI Liabilities	47.6	45.5	43.1	40.5	37.6	34.3
CFR c/fwd. 31 March	394.9	419.9	446.5	480.6	483.4	476.2
External Borrowing b/fwd. 1 April	(217.2)	(232.8)	(264.3)	(285.3)	(341.9)	(362.5)
Loan Maturities	1.5	11.9	11.8	13.2	14.9	15.6
HRA Debt repayment transfer to GF	(5.0)	(5.0)	(5.0)	(2.0)	(5.0)	(5.0)
New Loans	(12.1)	(38.4)	(27.8)	(64.8)	(30.5)	(31.2)
External Borrowing c/fwd. 31 March	(232.8)	(264.3)	(285.3)	(341.9)	(362.5)	(383.1)
Under / (Over) Borrowing	114.5	110.1	118.1	98.2	83.3	58.8
<i>Under borrowing as a % of Underlying Borrowing Requirement (excludes PFI)</i>	33%	29%	29%	22%	19%	13%

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HRA Fund Projections	2019/20 (£m)	2020/21 (£m)	2021/22 (£m)	2022/23 (£m)	2023/24 (£m)	2024/25 (£m)
CFR excl. PFI b/fwd. 1 April	109.0	104.0	99.0	94.0	92.0	87.0
Add Capital Expenditure funded through borrowing	-	-	-	3.0	-	-
Less MRP (debt repayment)	(5.0)	(5.0)	(5.0)	(5.0)	(5.0)	(5.0)
Underlying Borrowing Requirement	104.0	99.0	94.0	92.0	87.0	82.0
CFR c/fwd. 31 March	104.0	99.0	94.0	92.0	87.0	82.0
External Borrowing b/fwd. 1 April	(109.0)	(104.0)	(99.0)	(94.0)	(92.0)	(87.0)
HRA Debt repayment transfer to GF	5.0	5.0	5.0	2.0	5.0	5.0
External Borrowing c/fwd. 31 March	(104.0)	(99.0)	(94.0)	(92.0)	(87.0)	(82.0)
Under / (Over) Borrowing	-	-	-	-	-	-

- 3.5 A key aspect of the regulatory and professional guidance is that elected members are aware of the size and scope of any commercial activity in relation to the authority's overall financial position. The capital expenditure figures shown in 2.1 and the details above demonstrate the scope of this activity and, by approving these figures, consider the scale proportionate to the Authority's remaining activity.

Core funds and expected investment balances

- 3.6 The application of resources (capital receipts, reserves etc.) to either finance capital expenditure or other budget decisions to support the revenue budget will have an ongoing impact on investments unless resources are supplemented each year from new sources (asset sales etc.).

4 Affordability Indicators

- 4.1 Prudential indicators are required to assess the affordability of the capital investment plans. These provide an indication of the impact of the capital investment plans and subsequent finance costs on the Council's overall finances.

Ratio of financing costs to net revenue stream

- 4.2 The table below shows the estimated financing costs (interest and debt repayment) as a proportion of the General Fund and HRA budgets.

Estimate of the ratio of financing costs to net revenue stream						
	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25
General Fund	8.6%	9.3%	10.3%	12.5%	12.8%	13.1%
HRA	38.8%	38.8%	52.9%	41.0%	34.4%	30.3%

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- 4.3 The table below shows the HRA CFR & includes the anticipated HRA investment balances these are expected to reduce over the next 4 years as the HRA uses its capital reserves to purchase property & new build schemes.

HRA Portfolio	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25
	(£m)	(£m)	(£m)	(£m)	(£m)	(£m)
HRA CFR 31st March	104.0	99.0	94.0	92.0	87.0	82.0
HRA Average investment balance	20.0	15.0	5.0	5.0	5.0	5.0
Number of HRA dwellings	10,279	9,858	9,838	9,794	9,823	9,763
Debt per dwelling	£10,119	£10,044	£9,556	£9,395	£8,858	£8,401

Treasury Indicators: limits to borrowing activity

- 4.4 **The Operational Boundary.** This is the limit beyond which external borrowing is not normally expected to exceed. This limit reflects the Councils current estimated debt position, with the assumption that internal borrowing (using existing working capital cash balances temporarily to fund capital expenditure in advance of undertaking new external borrowing) will be reduced as new external borrowing is undertaken. Other long term liabilities represent PFI and finance leases.

Operational Boundary	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25
	(£m)	(£m)	(£m)	(£m)	(£m)	(£m)
CFR (borrowing requirement)	451.3	473.5	497.4	532.1	532.8	523.9
PFI liabilities	47.6	45.5	43.1	40.5	37.6	34.3
Uplift	20.0	20.0	20.0	20.0	20.0	20.0
Total	518.9	539.0	560.5	592.6	590.4	578.2

- 4.5 **The Authorised Limit for external borrowing.** A further key prudential indicator, this represents a control on the maximum level of borrowing. This represents a legal limit beyond which external borrowing is prohibited, and this limit needs to be set or revised by the full Council. It reflects the level of external debt which, while not desired, could be afforded in the short term, but is not sustainable in the longer term.

- This is the statutory limit determined under section 3 (1) of the Local Government Act 2003. The Government retains an option to control either the total of all councils' plans, or those of a specific council, although this power has not yet been exercised.
- The Council is asked to approve the following authorised limit:

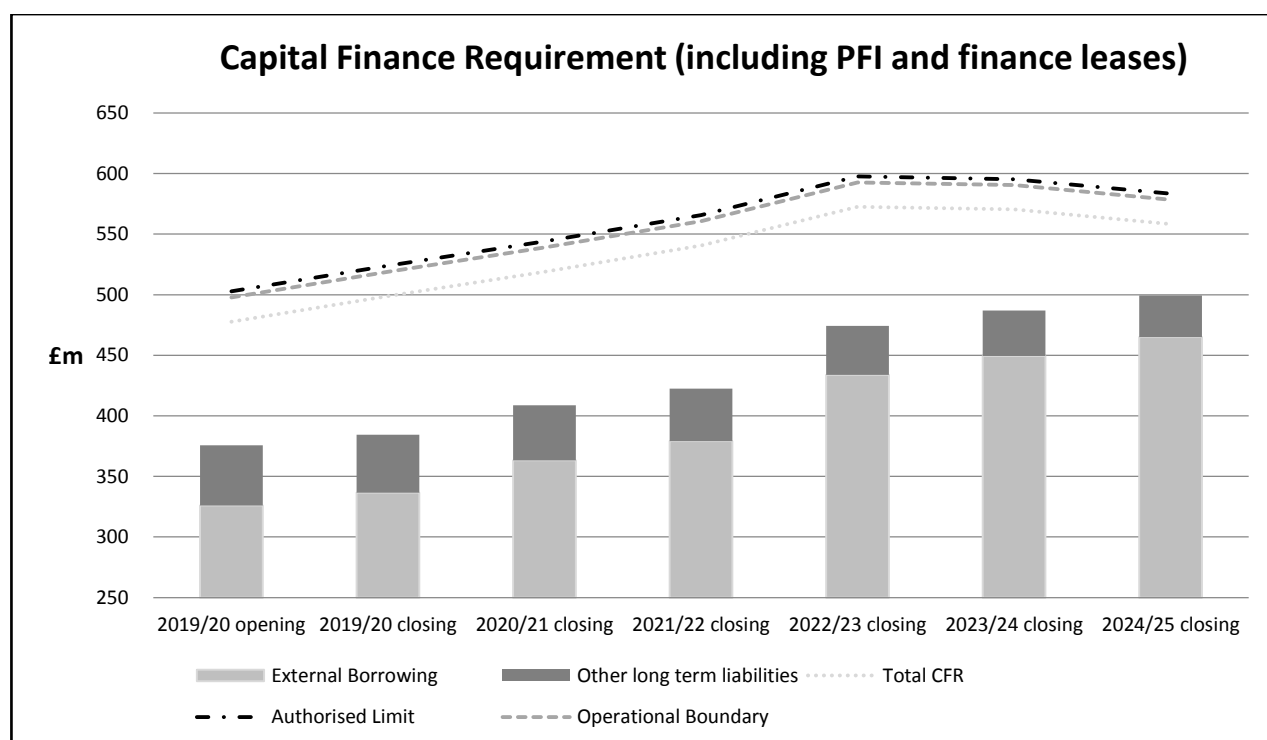
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Authorised Limit	2019/20 (£m)	2020/21 (£m)	2021/22 (£m)	2022/23 (£m)	2023/24 (£m)	2024/25 (£m)
Operational Limit	518.9	539.0	560.5	592.6	590.4	578.3
Uplift	5.0	5.0	5.0	5.0	5.0	5.0
Total	523.9	544.0	565.5	597.6	595.4	583.2

4.6 The above information is summarised in the graph below, showing existing debt, the CFR, the Operational Limit and the Authorised Limit



5 Activity Limit Indicators

5.1 There are three debt related treasury activity limits. The purpose of these are to restrain the activity of the treasury function within certain limits, thereby managing risk and reducing the impact of any adverse movement in interest rates. However, if these are set to be too restrictive they will impair the opportunities to reduce costs / improve performance. The indicators are:

- **Upper limits on variable interest rate exposure.**
This identifies a maximum limit for variable interest rate loans (based upon the debt position net of investments)
- **Upper limits on fixed interest rate exposure.**
This is similar to the previous indicator and covers a maximum limit on fixed interest rates loans;

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- **Maturity structure of borrowing**

These gross limits are set to reduce the Council's exposure to large fixed rate sums falling due for refinancing in a single period;

Interest rate Exposures		
	Upper	
Limits on fixed interest rates based on net debt	100%	
Limits on variable interest rates based on net debt	30%	
Maturity Structure of fixed & variable interest rate borrowing 2020/21		
	Lower	Upper
Under 12 months	0%	10%
12 months to 2 years	0%	25%
2 years to 5 years	0%	35%
5 years to 10 years	0%	35%
10 years and above	0%	80%
In any 10 year period above 10 years	0%	40%

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Annex 2 – Credit and Counterparty Risk Management, Specified and Non- Specified Investments

1 Treasury Management Practices – Treasury Investments

- 1.1 The MHCLG issued Investment Guidance in 2018, and this forms the structure of the Council's policy.
- 1.2 The key intention of the Guidance is to maintain the current requirement for councils to invest prudently, and that priority is given to security and liquidity before yield. In order to facilitate this objective the guidance requires this Council to have regard to the CIPFA publication Treasury Management in the Public Services: Code of Practice and Cross-Sectoral Guidance Notes. This Council adopted the Code on the 1st April 2008 and will apply its principles to all investment activity. In accordance with the Code, the Corporate Director of Finance and Assets has produced its Treasury Management Practices (TMPs). This part, (TMP1), covering investment counterparty policy requires approval each year.
- 1.3 **Annual investment strategy** - The key requirements of both the Code and the investment guidance are to set an annual investment strategy, as part of its annual treasury strategy for the following year, covering the identification and approval of following:
 - The strategy guidelines for choosing and placing investments, particularly non-specified investments.
 - The principles to be used to determine the maximum periods for which funds can be committed.
 - Specified investments that the Council will use. These are high security (i.e. high credit rating, although this is defined by the Council, and no guidelines are given), and high liquidity investments in sterling and with a maturity of no more than a year.
 - Non-specified investments, clarifying the greater risk implications, identifying the general types of investment that may be used and a limit to the overall amount of various categories that can be held at any time.

2 Treasury Management Practices – Non-Treasury Investments

- 2.1 The Council's Capital Strategy contains the criteria that will be adhered to when Non-Treasury investments are being considered, they are replicated here to enable all of the indicators to be consolidated in one place. (Annex 3 to the Capital Strategy)

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Risk management

- 2.2 All business case proposals will clearly identify risk to ensure these are acceptable to the Council with a clear focus on the impact of the downside risk on the overall sustainability of the authority.
- 2.3 Managing the Council's risks is an area of significant focus for senior management and members, and risk management is at the heart of all investment as well as operational decisions.
- 2.4 The Council aims to minimise its exposure to unwanted risks – those risks that are not actively sought and which carry no commensurate reward for the Council – through a range of mitigation strategies to the extent that it is cost-effective to do so. Specifically, the Council has no appetite for reputational risk, governance risk and currency risk.
- 2.5 The following local indicators will be used to assess the Council's total risk exposure as a result of its commercial investment decisions and will form part of the treasury management out-turn report
- Total Investment in commercial undertakings by Property/Other
 - Total Investment funded through borrowing
 - Average investment return before financing costs
 - Total investment income as a proportion of the Council's Net General Fund budget
 - Investment borrowing as a proportion of total external debt as measured by the Capital Financing Reserve (excl. lease liabilities and HRA)
 - Fair value of property investments as a proportion of all Council property assets
- 2.6 In considering risk, it is vital that not only the risks of individual investments are considered but also the cumulative impact of all the investments made by the authority and the interaction of individual risks. The Commercial Investment Strategy Board will therefore review the overall portfolio in light of current market and other risks.
- 2.7 The limits on loans by type are as follows:
- Wholly owned companies and joint ventures - £51m
 - Local Enterprises and charities - £1m

Performance, measurement and management

- 2.8 The Commercial Investment Strategy Board will receive regular reports setting out the performance and current risk in relation to the overall investment portfolio.
- 2.9 Regular monitoring of the portfolio will identify any changes in Security, Liquidity and Yield and will also identify any lifecycle costs required to maintain the income potential of any property based assets. Values will also be regularly assessed to identify any significant changes in the value of the investments and market conditions that might impact upon this.

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- 2.10 Any material change in the investment risk or threat to ongoing yield will be reported immediately to the next Board meeting (or immediately to the Chair if urgent action is required) so that mitigating action can be established. In considering risk, it is vital that not only the risks of individual investments are considered but also the cumulative impact of all the investments made by the authority and the interaction of individual risks. The Commercial Investment Strategy Board will therefore review the overall portfolio in light of current market and other risks.

Decision making, governance and organisation

- 2.11 All Commercial Investment proposals must be taken through the Commercial Investment Strategy Board ("CISB") in the form of a business case which sets out the financial implications and the risks.
- 2.12 The Board is chaired by the Cabinet Member for Finance, Education and Skills and is attended by the Chief Executive and Corporate Director of Finance and Assets. It meets monthly to review all proposals. If successful they either proceed to Cabinet for approval if the investment required is greater than £10m, or through a Cabinet Member Decision Note process if less than £10m. In addition, there is a CMAG (Cabinet Member Advisory Group) for additional scrutiny and comment.
- 2.13 The CISB will also obtain external expert advice if required, including additional legal advice if required, and has procured expert commercial property advice for this purpose as it continues to look for commercial property investments to support the budget.
- 2.14 The CISB has also approved a Property Investment and Disposal Strategy which sets out a number of criteria by which property investment proposals will be assessed. These are covered in the Capital Strategy, (this forms part of the Capital Report elsewhere on this agenda).
- 2.15 Proposals other than those assessed against the criteria in the Property Investment and Disposal Strategy will be assessed against the following criteria:
- Is the overall profit acceptable to the risk?
 - Are the timescales for returns realistic and acceptable?
 - Are the risks acceptable and/or controllable?
 - Is the investment required proportional to the level of resources available to the Authority?
 - Is external expertise required to fully understand the business case proposal and risks?
- 2.16 The purpose of the criteria set out above is to set a framework by which to assess commercial proposals and ensure consistency is applied when making decisions.

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Training and qualifications

- 2.17 Hartnell Taylor Cook, a firm of specialist commercial property consultants, have been procured to offer external expert advice on proposed purchases as well as an overview of the overall Council portfolio to ensure the portfolio is balanced, and risks are actively identified and managed.
- 2.18 The Council has also engaged specialist accounting and financial advisors to support this process.
- 2.19 The training needs of property management officers are kept under review, and officers attend training events and seminars held by CIPFA and other Training Organisations relevant to their professional qualifications.

3 Specified/Non-Specified Investments

- 3.1 The main strategy guidelines are contained in the body of the Treasury Strategy statement. The paragraphs below detail the Council's use of Specified and Non-Specified Investments
- 3.2 **Specified Investments** – These investments are sterling investments of not more than one-year maturity, or those which could be for a longer period but where the Council has the right to be repaid within 12 months if it wishes. These are considered low risk assets where the possibility of loss of principal or investment income is small. These would include sterling investments which would not be defined as capital expenditure with:
 - The UK Government (such as the Debt Management Account deposit facility, UK Treasury Bills or Gilt with less than one year to maturity).
 - Supranational bonds of less than one year's duration.
 - A local authority, parish council or community council.
 - Pooled investment vehicles (such as money market funds) that have been awarded a high credit rating by a credit rating agency. This covers pooled investment vehicles, such as money market funds, rated AAA by Standard and Poor's, Moody's or Fitch rating agencies.
 - A body that is considered of a high credit quality (such as a bank or building society) in accordance with the Councils creditworthiness Policy.
- 3.3 Within these bodies, and in accordance with the Code, the Council has set additional criteria to set the time and amount of monies which will be invested in these bodies. The Council has historically maintained a position of minimising investment balances and using these to reduce the requirement for borrowing. The investments made by the Council will therefore be timed to coincide with predicted day to day treasury requirements and thus are primarily of a short term nature.

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3.4 **Non-Specified Investments** – Non-specified investments are any other type of investment (i.e. not defined as Specified above). The Council holds 5 types of non-specified investments:

- Cash deposits > 1 year (Category (e) below)
- Share Capital (Category (f) below)
- Loan Capital (Category (g) below)
- The Local Authority Property Fund (Category (i) below).
- Loan to local Charity (Category (j) below).

Other Non-specified investments that the Council could make would include any investments with:

	Non Specified Investment Category
a	Supranational Bonds greater than 1 year to maturity Multilateral development bank bonds - These are bonds defined as an international financial institution having as one of its objects economic development, either generally or in any region of the world (e.g. European Reconstruction and Development Bank etc.). A financial institution that is guaranteed by the United Kingdom Government (e.g. National Rail) The security of interest and principal on maturity is on a par with the Government and so very secure. These bonds usually provide returns above equivalent gilt edged securities. However the value of the bond may rise or fall before maturity and losses may accrue if the bond is sold before maturity.
b	Gilt edged securities with a maturity of greater than one year. These are Government bonds and so provide the highest security of interest and the repayment of principal on maturity. Similar to category (a) above, the value of the bond may rise or fall before maturity and losses may accrue if the bond is sold before maturity.
c	The Council's own banker if it fails to meet the basic credit criteria. In this instance any balances will be maintained on an instant access basis
d	Building societies not meeting the basic security requirements under the specified investments. The operation of some building societies does not require a credit rating, although in every other respect the security of the society would match similarly sized societies with ratings. The Council may use such building societies but will take specific advice before doing so.
e	Any bank or building society that complies with the Council's creditworthiness policy for deposits with a maturity of greater than one year (including forward deals in excess of one year from inception to repayment).
f	Share capital in a body corporate – The use of these instruments will be

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	deemed to be capital expenditure, and as such will be an application (spending) of capital resources. Revenue resources will not be invested in corporate bodies. See note 1 below.
g	Loan capital in a body corporate. See note 1 below.
h	Bond funds. See note 1 below.
i	Property funds – The use of these instruments can be deemed to be capital expenditure, and as such will be an application (spending) of capital resources. This Authority will seek guidance on the status of any fund it may consider using.
j	Loan capital to local charity – The Council will provide loans to local charities that meets the Council's priorities and can demonstrate that they are sustainable in the medium term and able to meet their repayments as they fall due. Such loans will be for no more than 3 years, and will be closely monitored to ensure any risk of default is minimised.

Note 1: This Authority will seek further advice on the appropriateness and associated risks with investments in these categories.

The monitoring of investment counterparties - The credit rating of counterparties will be monitored regularly. The Council receives credit rating information (changes, rating watches and rating outlooks) from Link Asset Services as and when ratings change, and counterparties are checked promptly. On occasion ratings may be downgraded when an investment has already been made. The criteria used are such that a minor downgrading should not affect the full receipt of the principal and interest. Any counterparty failing to meet the criteria will be removed from the list immediately and if required new counterparties which meet the criteria will be added to the list.

4 TREASURY MANAGEMENT SCHEME OF DELEGATION

4.1 Full Council

- Receiving and reviewing reports on treasury management policies, practices and activities;
- Approval of annual strategy.

4.2 Cabinet

- Approval of / amendments to the organisation's adopted clauses, treasury management policy statement and treasury management practices;
- Budget consideration and approval;
- Approval of the division of responsibilities;

- Receiving and reviewing regular monitoring reports and acting on recommendations;
- Approving the selection of external service providers and agreeing terms of appointment.

4.3 Audit Committee

- Reviewing the treasury management policy and procedures and making recommendations to the responsible body.

5 THE TREASURY MANAGEMENT ROLE OF THE SECTION 151 OFFICER

The S151 (responsible) officer

- Recommending treasury management policy/practices for approval, reviewing the same regularly, and monitoring compliance;
- Submitting regular treasury management policy reports;
- Submitting budgets and budget variations;
- Receiving and reviewing management information reports;
- Reviewing the performance of the treasury management function;
- Ensuring the adequacy of treasury management resources and skills, and the effective division of responsibilities within the treasury management function;
- Ensuring the adequacy of internal audit, and liaising with external audit;
- Recommending the appointment of external service providers.
- Preparation of a capital strategy to include capital expenditure, capital financing, non-financial investments and treasury management, with a long term timeframe.
- Ensuring that the capital strategy is prudent, sustainable, affordable and prudent in the long term and provides value for money
- Ensuring that due diligence has been carried out on all treasury and non-financial investments and is in accordance with the risk appetite of the authority
- Ensure that the authority has appropriate legal powers to undertake expenditure on non-financial assets and their financing
- Ensuring the proportionality of all investments so that the authority does not undertake a level of investing which exposes the authority to an excessive level of risk compared to its financial resources
- Ensuring that an adequate governance process is in place for the approval, monitoring and ongoing risk management of all non-financial investments and long term liabilities
- Provision to members of a schedule of all non-treasury investments including material investments in subsidiaries, joint ventures, loans and financial guarantees
- Ensuring that members are adequately informed and understand the risk exposures taken on by an authority

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- Ensuring that the authority has adequate expertise, either in house or externally provided, to carry out the above
- Creation of Treasury Management Practices which specifically deal with how non treasury investments will be carried out and managed, to include the following: -
 - Risk management, including investment and risk management criteria for any material non-treasury investment portfolios;
 - Performance measurement and management, including methodology and criteria for assessing the performance and success of non-treasury investments;
 - Decision making, governance and organisation, including a statement of the governance requirements for decision making in relation to non-treasury investments; and arrangements to ensure that appropriate professional due diligence is carried out to support decision making;
 - Reporting and management information, including where and how often monitoring reports are taken;
 - Training and qualifications, including how the relevant knowledge and skills in relation to non-treasury investments will be arranged.

Appendix 1 – Overview of HRA Revenue Budget

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	2019/20 Budget	2020/21 Proposed Budget
	£	£
Expenditure		
Management (staff, overheads and service charge costs)	12,756,000	13,273,200
Repairs (incl. staff costs)	11,851,900	12,562,500
Discretionary Housing Payments	200,000	200,000
Rent, Rates & Taxes	68,500	110,000
Debt Management fees and Debt Rescheduling Premium	60,000	60,000
Gross Expenditure	24,936,400	26,205,700
Income		
Rents	(43,767,300)	(44,171,100)
Voids and Bad debts	1,120,300	1,000,300
Service Charges	(3,628,700)	(3,908,800)
Other Income (garages, commercial property, Homeline)	(2,566,600)	(2,679,000)
Gross Income	(48,842,300)	(49,758,600)
Net Cost of Services	(23,905,900)	(23,552,900)
Net Interest costs (after interest receivable has been deducted)	3,507,900	3,312,900
Contribution to Capital Expenditure and loan repayment	5,000,000	5,000,000
Contribution from General Reserves	0	0
Projected (surplus) / deficit for the year	(15,398,000)	(15,240,000)
Use of operating Surplus with £5m Loan Repayment		
Funding available for Capital Investment	15,398,000	15,240,000
Use of Operating Surplus	15,398,000	15,240,000

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Appendix 2 – Service charges for 2020/21

	Current Charge 2019/20	Proposed Charge 2020/21
	£	£
<u>Flats (Communal entrance)</u>		
Service Charge - Staircase Lighting	0.75	0.75
Multi Storey service charge	10.52	10.50
Neighbourhood Wardens Low & medium rise blocks service charge	1.87	1.80
Neighbourhood Wardens General stock service charge	1.00	1.00
Townsend House	9.86	9.86
<u>Sheltered Housing</u>		
Sheltered service charge	26.68	27.40
Heating charge - private use	6.50	7.02
Heating charge - communal use	2.54	2.83
Water charge	4.39	4.55
Extra Care (Newburgh House)	3.25	4.83
Guest room charge	16.00	16.50
Guest flat charge	18.00	18.50
<u>Other</u>		
Cable TV charge	2.04	2.20
Communal TV aerials	1.17	1.20
Grass Cutting	4.00	5.00
Hedge	2.00	2.50
Furniture Charge - Full Flat	5.00	5.00
Emergency Room Service Charge	17.61	18.60
<u>Support Charges</u>		
Sheltered housing support charge	3.13	3.13
Sheltered transitional protection	-1.67	-1.67
Homeline Charge	4.77	4.90
Homeline transitional protection	-0.30	-0.30
Homeline Charge - private tenants	7.48	7.86
Homeline Plus level 1	13.79	14.16
Homeline Plus level 2	15.35	15.76
Homeline Plus level 3	17.41	17.88

Appendix 2 – Service charges for 2020/21 (continued)

	Current Charge 2019/20	Proposed Charge 2020/21
	£	£
<u>Garage / Parking Charges</u>		
Garage rent	8.69	9.12
Account Garage + VAT	9.62	10.10
Parking space	2.94	3.09
Cross over - existing tenants	2.59	2.66
Cross over - new tenants	5.07	5.21
Cross over - new build properties (2 spaces)	10.14	10.41
Account parking space + VAT	3.28	3.44
Premium Garage + VAT	11.53	12.11
Premium parking space + VAT	7.21	7.57
<u>Supported Housing</u>		
Service Charge	44.59	45.79
Heating charge - private use	5.87	6.03
Heating charge - communal use	2.06	2.51
Water charge	5.56	6.23
Electricity	6.18	6.35
<u>Small Housing Schemes</u>		
Service charge - Moredon Road	35.26	35.26
Service charge - William Robins Court - LD clients	22.45	22.45
Service charge - William Robins Court - General needs	12.28	12.28
Service charge - Baileys Farm Gardens - General needs	14.58	14.59
Service charge - Baileys Farm Gardens - General needs water	4.34	4.34
Service charge - Marlowe Avenue	24.36	24.36
Service charge - Twyford Close	9.21	9.47
Service charge - Evelyn House (SBC element)	25.42	15.87
Service charge - Tyndale Gardens (SBC element)	30.94	14.48
Service charge - Kimmerfield Court (SBC element)	6.20	6.32
Service charge - Kimmerfield Court - Private heating charge	3.99	3.99
Service charge - Kimmerfield Court - Communal heating charge	1.74	1.74
Service charge - Sussex Place	1.37	1.37

Appendix 3 - Leaseholder Charges

	Current Charge 2019/20	Proposed Charge 2020/21
	£	£
Ground Rent - Annual Charge	10.00	10.00
Leaseholder management charge - all properties	173.16	177.84
Leaseholder management charge - properties with communal areas	207.36	212.96
Service Charge - Staircase Lighting adjusted to actual charge during annual review	34.89	39.53
Multi Storey service charge	443.95	448.59
Administration charge dealing with the re-sale of leasehold interest	174.68	179.40

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Appendix 4 - Detailed HRA Budget 2020/21

Item		2019/20 Budget	2020/21 Proposed Budget
		£	£
	<u>EXPENDITURE</u>		
1	S&M General	6,792,800	7,244,700
2	S&M Special	5,963,200	6,028,500
3	Repairs Administration	1,175,200	1,051,000
4	Contribution to Repairs Account	10,676,700	11,511,500
5	Rent, Rates & Taxes	68,500	110,000
	<u>Capital Financing</u>		
6	Funding available for Capital Investment	15,398,000	15,240,000
7	Debt Management	60,000	60,000
8	Discretionary Housing Payments	200,000	200,000
9	<u>TOTAL EXPENDITURE</u>	40,334,400	41,445,700
	<u>INCOME</u>		
	<u>Rent income</u>		
10	Dwellings	(43,767,300)	(44,171,100)
11	Provision for Bad Debts	620,300	600,300
12	Less voids	500,000	400,000
13	Garages	(215,000)	(230,000)
14	Shops / Commercial	(76,000)	(76,000)
15	Support charges - Sheltered	(216,000)	(216,000)
16	Sheltered Housing Service Charges	(2,269,000)	(2,575,200)
17	Supported Housing Service Charge	(453,300)	(455,200)
		(45,876,300)	(46,723,200)
18	Miscellaneous Properties Rent	(95,000)	(95,000)
19	Service Charges - Flats	(92,800)	(92,800)
20	Sheltered Housing Heating Charges	(597,600)	(569,600)
21	Homeline	(1,019,400)	(1,068,600)
22	Other Service Charges / Other income	(1,161,200)	(1,209,400)
23	Contribution from General Reserves	0	0
		(2,966,000)	(3,035,400)
24	<u>TOTAL INCOME</u>	(48,842,300)	(49,758,600)
25	<u>NET COST OF SERVICES</u>	(8,507,900)	(8,312,900)
26	Loan Charges - Interest	3,619,300	3,453,300
27	Interest on balances (interest receivable)	(111,400)	(140,400)
28	Right to buy mortgage interest (interest receivable)	0	0
29	<u>NET OPERATING EXPENDITURE</u>	(5,000,000)	(5,000,000)
30	Loan repayments	5,000,000	5,000,000
31	<u>PROJECTED (SURPLUS) / DEFICIT FOR THE YEAR</u>	0	0

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Appendix 5 - Proposed HRA Capital Budget 2020/21

Item		2019/20 Budget	2020/21 Proposed Budget
		£	£
	<i>HRA Capital Schemes</i>		
1	Capital Projects (including vehicle replacement) and Planned Maintenance Programme	8,000,000	15,240,000
2	Carried forward from previous year's Programme	0	2,000,000
3	Anticipated spend on Acquisition Programme (Budget £4m)	5,100,000	4,000,000
4	Anticipated spend on Housing Development Programme	6,780,000	8,968,500
5	Total Capital Programme	19,880,000	30,208,500
	HRA Capital Funding Applied		
6	Funding available for Capital Investment - transfer to MRR	15,398,000	15,240,000
7	In year Capital receipts	0	0
8	S106 Funding	2,000,000	2,000,000
9	In year resources available	17,398,000	17,240,000
	HRA Capital Reserves		
10	Usable Capital Receipts		
11	Prudential Borrowing		
12	HCA Funding	0	3,780,000
13	RTB Funding Used	1,530,000	1,200,000
14	HRA Capital Reserves	9,471,000	10,519,000
15	In year resources available	11,001,000	15,499,000
16	Total HRA Capital Funding	28,399,000	32,739,000
	<u>RTB retained funding</u>		
17	Brought forward	4,903,600	6,073,600
18	Used in year	(1,530,000)	(1,200,000)
19	Additional funding from in year sales	2,700,000	2,700,000
20	Resources carried forward	6,073,600	7,573,600

The HRA Business Plan assumes that any shortfall in funding would be met initially from General Reserves before any additional borrowing is required.

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Appendix 6 - Proposed 5 year Capital Programme

Element	2020/21 Proposed £000's	2021/22 Indicative £000's	2022/23 Indicative £000's	2023/24 Indicative £000's	2024/25 Indicative £000's
Components #	6,886	7,211	7,027	7,785	9,913
Contingent Major Repairs	550	300	300	300	300
Cyclical Planned Maintenance	2,030	2,030	2,030	2,030	2,030
EWI Refurbishment	2,100	4,000	5,000	5,400	5,400
Improvements	1,210	900	900	900	900
Major Adaptations	1,500	1,500	1,500	1,500	1,500
Vehicle Replacement Programme	750	500	500	500	500
Repairs Team relocation to Hillmead	500				
Grand Total	15,526	16,441	17,257	18,415	20,543

- Components typically cover the replacement of kitchens, bathrooms, roofs, windows, doors, boilers, central heating, rewiring etc

All budgets are shown at 2019/20 prices.

Any shortfall between the Capital Programme planned expenditure shown above and the funding available as indicated in the business plan at Appendix 8, will be addressed as part of budget setting at the start of each year.

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Appendix 7 - Proposed HGF Rents & Service Charges **2020/21**

	Current Charge 2019/20	Proposed Charge 2020/21
<u>Christopher House, Marlowe Avenue</u>		
Service Charge	12.06	12.06
<u>David Murray John Building</u>		
Service charge - 1 bed property	18.09	18.09
Service charge - 2 bed property	21.28	21.28
<u>PSL rents</u>		
1 Bed	113.03	To be confirmed by Gov't
2 Bed	135.28	
3 Bed	167.16	
4 Bed	210.17	
Private Sector Landlord Rents have been reduced in response to Government removing the previous weekly management fee. The fee has been replaced by the Flexible Homeless Support Grant that is not ring-fenced to Homelessness and has so far only been made confirmed up to and including 2019/20, although the Government have indicated levels for 2020/21 will be in line with 2019/20.		

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Appendix 8 - Comparison of Business Plans showing the impact of changes made as part of the budget setting for 2020/21 over the next 4 years

Current 19/20 HRA Business Plan										
Income						Expenditure		Net Available for Investment		
Year	Rental Income	Voids & Bad Debts	Net Rental Income	Other income	Total Income	Total expenses	Debt Interest	Net Operating Expenditure	Debt Repayment	Available for Capex
	£,000	£,000	£,000	£,000	£,000	£,000	£,000	£,000	£,000	£,000
1 2020.21	42,206	(1,129)	41,077	8,587	49,664	(25,404)	(3,555)	20,705	(5,000)	15,705
2 2021.22	43,394	(1,160)	42,234	8,778	51,012	(26,028)	(3,384)	21,600	(5,000)	16,600
3 2022.23	44,917	(1,191)	43,726	8,994	52,720	(26,665)	(3,231)	22,824	(5,000)	17,824
4 2023.24	46,474	(1,223)	45,251	9,273	54,524	(27,318)	(3,844)	23,362	(5,000)	18,362
Totals	176,991	(4,703)	172,288	35,632	207,920	(105,415)	(14,014)	88,491	(20,000)	68,491
Revised 20/21 HRA Business Plan										
Income						Expenditure		Net Available for Investment		
Year	Rental Income	Voids & Bad Debts	Net Rental Income	Other income	Total Income	Total expenses	Debt Interest	Net Operating Expenditure	Debt Repayment	Available for Capex
	£,000	£,000	£,000	£,000	£,000	£,000	£,000	£,000	£,000	£,000
1 2020.21	41,727	(1,000)	40,727	9,139	49,866	(26,114)	(3,513)	20,239	(5,000)	15,239
2 2021.22	42,935	(1,025)	41,910	9,379	51,289	(26,751)	(3,384)	21,154	(5,000)	16,154
3 2022.23	44,027	(1,050)	42,977	9,602	52,579	(27,405)	(3,213)	21,961	(5,000)	16,961
4 2023.24	45,455	(1,075)	44,380	9,844	54,224	(28,074)	(3,042)	23,108	(5,000)	18,108
Totals	174,144	(4,150)	169,994	37,964	207,958	(108,344)	(13,152)	86,462	(20,000)	66,462
Business Plan Variations										
Income						Expenditure		Net Available for Investment		
Year	Rental Income	Voids & Bad Debts	Net Rental Income	Other income	Total Income	Total expenses	Debt Interest	Net Operating Expenditure	Debt Repayment	Available for Capex
	£,000	£,000	£,000	£,000	£,000	£,000	£,000	£,000	£,000	£,000
1 2020.21	-479	129	(350)	552	202	(710)	42	(466)	0	(466)
2 2021.22	-459	135	(324)	601	277	(723)	0	(446)	0	(446)
3 2022.23	-890	141	(749)	608	(141)	(740)	18	(863)	0	(863)
4 2023.24	-1,019	148	(871)	571	(300)	(756)	802	(254)	0	(254)
Totals	(2,847)	553	(2,294)	2,332	38	(2,929)	862	(2,029)	0	(2,029)

The "Available for Capex" figures include an element earmarked for depreciation charges on vehicles

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Appendix 1

Delayed and Deferred Admissions

Aim

1. The aim of this policy is to establish a procedure which gives parents, schools and settings clear guidance on deferred and delayed admission. When a delayed request is made for an **own admission authority school** the decision rests with the school requested, but the Local Authority will coordinate the request.

2. Key Principles

- 2.1 All children and young people should normally be educated in their chronological year group.
- 2.2 Schools assess the learning needs of children and young people so that the curriculum they provide is relevant enabling them to make appropriate progress and maximise their achievement.
- 2.3 Admission of children outside their normal year group will be made in accordance with the School Admissions Code 2014 – Paragraphs 2.17 A and B.
- 2.4 There is no statutory barrier to children being admitted outside their normal age group, but parents do not have the right to insist that their child is admitted to a particular age group.
- 2.5 The decision is made by the relevant Admission Authority, details of which are shown below:-

3. <u>Type of School</u>	<u>Admission Authority:</u>
4. Academy	Academy Trust
5. Community	Local Authority
6. Foundation	Governing Body
7. Voluntary Aided	Governing Body
8. Voluntary Controlled	Local Authority

- 2.6 For children already in school in an existing year group the head teacher will make the decision on whether the child should be educated in a year group outside of their chronological age.
- 2.7 For children moving into the authority the admission will be considered against the child's chronological age group.

3 Deferred and Delayed Entry Reception Classes:

- 3.1 Children usually start school in the September after their 4th birthday. All children are entitled to a full time school place at this point.

3.2 Parents do not have to send their children to school until they reach compulsory school age, which will be on a set date following their 5th birthday. They must attend school full time from that point.

3.3 Children born from the 1st April to the 31st August are known as Summer Born Children. Summer born children do not need to start school until the September following their 5th birthday, a full academic year after they are first entitled to a school place.

3.4 There are a number of options available to parents if they do not feel that their child is ready start school full time in the September following their 4th birthday:

- Defer their entry to a point later in the school year (please see Deferred entry section below)
- Arrange for them to attend school part time – parents can request this from the school allocated.
- If the child is summer born, parents can request that their child's admission be deferred by a full year, until the September after their 5th birthday. However, the child would need to attend the school for at least the final term of that academic year because it is not possible to reserve a school place for a full academic year. Even if the child is summer born they must attend school for at least the final term in order to keep the school place offered. If the child does not attend the school for the final term, the place would be withdrawn and the parent would need to make an in year application for a place for the child in Year 1.

4 Deferred Entry

4.1 The Early Years Foundation Stage spans pre-school to the reception age group within school, providing appropriate learning experiences for children aged 3 – 5 years.

4.2 Primary education is normally provided in primary schools although, in some areas, there are separate infant and junior schools. Children whose fifth birthday falls before 1 September, 1 January or 1 April become compulsory school age on whichever of these dates follows their fifth birthday. However, so that all children can benefit from three full years of infant education, children can be admitted to the reception year group at the beginning of the academic year starting in September.

4.3 Parents can request a deferred entry until later in the same school year as long as this does not go beyond the child's compulsory school age or beyond the academic year for which the original application was made.

4.4 Parents can request that their child takes up the reception place part-time until the child reaches compulsory school age. Once the child has started at the school parents cannot apply for delayed entry.

5 Delayed Entry

5.1 Children whose 5th Birthday falls in the Summer Term do not legally have to send their child to school until the following September. Parents of summer born children can request for their children to be admitted outside of their normal age group in Reception, instead of Year 1.

5.2 *Parents who wish to do this should apply to the Local Authority for a Reception place at the normal time but also complete the Request to Delay form to request to delay to the September following their child's 5th Birthday for the request to be considered. This is because if the request is refused parents will still have an on time application to be considered as part of the normal admissions round. A request for delayed entry must be made at the time the application is submitted.*

5.3 All requests should be submitted by the 15th January, the primary closing date. Requests can be submitted after this date but these may be considered later.

5.4 *Parents should submit evidence which allows admission authorities to determine why it would be in the child's interests to be admitted to reception rather than year one.* In some cases parents may have professional evidence that it would be appropriate for them to submit, for example, when a child receives support from a speech and language therapist. Admission authorities must still consider requests that are not accompanied by professional evidence. In such cases the supporting information might simply be the parent's statement as to why they have made their request.

5.5 Before deciding to delay their child's entry to school parents should visit the schools they are thinking of applying for. The teachers will be able to explain the provision on offer to children in the reception class, how it is tailored to meet the needs of the youngest pupils and how the needs of these pupils will continue to be met as they move up through the school. They may also be able to allay any concerns the parent may have about their child's readiness for school. Parents are encouraged to think carefully about this decision as it is likely to affect the child for the rest of their time at school. Children can develop at different rates and will continue to develop between the time parents request to delay and the point at which they become statutory school age. Parents are also asked to note that:

- The admission authority of one school is not required to comply with the decision made by another admitting authority. This means that if parents move schools, parents would need to make another request for a place outside of cohort for that new school to consider. If that is refused, the parent would need to apply for a place in the child's normal age group, one year above where they have been educated up to that point.
- Parents will also need to make another request when they apply for secondary school so that the child could start in year 7. If this is

refused, they would have to apply for a place in Year 8. This is the same for any phase transfer (infant to junior).

- A child ceases to be compulsory school age on the last Friday in June in the school year they become 16. Children are not legally required to attend school after this point. If a child has been educated outside of normal age group then they would be in Year 10 when they reached compulsory school age and this means the child would be under no obligation to attend school in Year 11 when most children would sit their GCSE's.
- Where a parent requests their child is admitted out of their normal age group, the school admission authority is responsible for making the decision on which year group a child should be admitted to.

5.6 They are required to make a decision on the basis of the circumstances of the case and in the best interests of the child concerned. This will require the admission authority to take account of the child's individual needs and abilities and to consider whether these can best be met in reception or year one. It will also involve taking account of the potential impact on the child of being admitted to year one without first having completed the reception year.

5.7 The views of the head teacher will be an important part of this consideration. In addition, as a consequence of being born before their due date, a child may fall into a different age group than if they had been born at full term. When considering the circumstances of the case, admission authorities should take account of the age group the child would have fallen in to if born on time.

5.8 Please note that the Admitting Authority of the School will contact any professionals they deem appropriate to be able to make an informed decision in regard to the child for example Health Visitor, School, Early Years Provider (pre school, private nursery, child minder), Education Psychologist, doctor or consultant. The details of the case will also be shared with these professionals.

6 Who makes the decision?

6.1 Decisions must be made by the admitting authority of the school. For Academy Schools this is the Academy Trust / Governing Body.

6.2 For Community and Voluntary Controlled Schools the final decision on delayed transfer will be taken by the Local Authority's Delayed School Entry Admissions Panel in consultation with the Headteacher of the school[s] requested. Parents will be informed in writing clearly setting out the reasons for the decision. The Delayed School Entry Admissions Panel is made up of representatives from Admissions, the Education professionals as necessary, Early Years Consultants, and SEND representatives if necessary.

7 What happens if the request is approved?

- 7.1 If a request to delay is approved, parents should withdraw their application for the normal age group. Parents will then need to make a new application as part of the main admission round for the following year.
- 7.2 Please note that parents can only apply for those schools that have agreed to the delayed admission, they cannot apply for any other school. Therefore it is in parent's interest to request to delay to more than one school.
- 7.3 If the LA is unable to allocate a place at one of the preferred schools that has agreed delayed admission, it will offer an alternative placement at the nearest school available if that school also agrees to the delay. If the alternative school is not agreeable to this, the LA will offer a place to the child in their normal age of entry i.e in Year 1 at an alternative school.
- 7.4 Parents should note that where their request to delay is agreed this does not guarantee a place at a particular school. Parents must apply again as part of the following admissions round and their application receives equal consideration with all others received. It remains possible, that the application would be refused a place if other applicants rank higher in the schools admissions criteria. In the event of a school being oversubscribed the admissions criteria will be used to determine the allocation of places and a delayed applicant does not receive any higher priority Therefore it is important parents request delay to every school that would like their child to attend.

8 What happens if the request is refused?

- 8.1 Where a parent's request is refused the on-time application will be processed as part of the main admissions round. Lower priority will not be given on the basis that the child is being admitted out of their normal age group.
- 8.2 Parents will need to decide whether to accept the offer of a place for the normal age group and defer admission until they become statutory school age, or to refuse the place and make an in year application for admission to Year 1 for the September following the child's fifth birthday.
- 8.3 Please note there is no right to appeal against a decision to refuse delayed admission.
- 8.4 Where a Swindon resident wishes to apply for a school outside of Swindon, they must gain agreement from that school / Local Authority that they would accept a delayed application.

9 Delayed Admission to Junior Schools and delayed transfer to Secondary Schools

- 9.1 Children and young people should transfer to the next phase of education (junior schools) with their peer group.
- 9.2 Parents of children who have delayed entry to reception, will need to make another request to delay when they would need to apply for a junior or

secondary school place i.e in Year 5 to be allowed to apply for a place when the child is in Year 6.

9.3 The implications for delayed pupils reaching statutory school leaving age before completing Key Stage 4 and social emotional issues for delayed pupils must be considered when making any decision.

9.4 The final decision on delayed transfer will be taken by the relevant admission authority. For Community and Voluntary Controlled Schools the final decision on delayed transfer will be taken by the Delayed School Entry Admissions Panel in consultation with the Headteacher of the school[s] requested. The decision will be based on sound educational reasons in the child's best interests, and will need to bear in mind the age group the child has been educated in up to that point.

10 Pupils with an Education Health and Care Plan

10.1 Due to their specific needs children with an Education Health and Care Plan may have it recognised that it is necessary to be taught outside their chronological year group. This decision will be made by the SEN Assessment Panel.



Swindon Borough Council
School Admissions Co-ordinated Schemes
Academic Year 2021-22

1. Introduction

In accordance with the School Admissions (Admission Arrangements and Co-ordination of Admission Arrangements) (England) Regulations 2012 Swindon Borough Council must formulate a scheme which outlines how it intends to manage admissions to all maintained schools¹ in its area and all admission authorities¹ must participate in this scheme. This scheme will apply where an applicant is resident within the Swindon Local Authority area.

Interpretation and Glossary

In this scheme –

“the LA” means Swindon Borough Council acting in their capacity as a Local (Education) Authority;

“the LA area” means the Borough of Swindon;

“Primary education” has the same meaning as in section 2(2) of the Education Act 1996;

“Primary school” has the same meaning as in section 5(2) of the Education Act 1996;

“Secondary education” has the same meaning as in section 2(2) of the Education Act 1996;

“Secondary school” has the same meaning as in section 5(2) of the Education Act 1996;

“school” means – a Community, Voluntary Aided, Voluntary Controlled, Trust School, Foundation School, Academy, University Technical College, Studio School or Free School

“admission authority” in relation to a Community or Voluntary controlled school means the LA and, in relation to an Academy, Foundation, Voluntary Aided or Free school means the governing body of that school;

“the specified year” means the school year beginning in September 2020

“admission arrangements” means the determined arrangements which govern the procedures and decision making for the purposes of admitting pupils to a school.

¹ References to schools in this scheme includes, community, voluntary controlled, voluntary aided, foundation or trust schools, academies, free schools and University Technical Colleges. All schools with the exception of community and voluntary controlled schools are their own admission authority.

2. Key Information for phased entry 2020-21

		Primary and Infant	Junior	Secondary
1.	Relevant Year Group	Reception (Yr 0)	Year 3	Year 7
2.	For children born between	1 st September 2016 and 31 st August 2017	1 st September 2013 and 31 st August 2014	1 st September 2009 and 31 st August 2010
3.	Applications can be made from	1 st September 2020	1 st September 2020	1 st September 2020
4.	Maximum number of preferences	3	3	3
5.	Deadline for ontime applications	Friday 15 th January 2021	Friday 15 th January 2021	Saturday 31 st October 2020
6.	Applications to be forwarded to other LA and Swindon admission authorities	Friday 12 th February 2021	Friday 12 th February 2021	Tuesday 2 nd December 2020
7.	Ranked lists to be returned by Swindon admission authorities	Friday 12 th March 2021	Friday 12 th March 2021	Tuesday 12 th January 2021
8.	Deadline for proof and changes of address to be received	Friday 12 th March 2021	Friday 12 th March 2021	Tuesday 12 th January 2021
9.	Swindon LA to notify schools of offers made	Thursday 1 st April 2021	Thursday 1 st April 2021	Friday 12 th February 2021
10.	Offers made to Swindon residents	Friday 16 th April 2021	Friday 16 th April 2021	Monday 1 st March 2021
11.	Deadline for parents to accept place	Friday 30 th April 2021	Friday 30 th April 2021	Monday 15 th March 2021

Table 1

- 2.1. The primary and secondary co-ordinated scheme will apply to all admission authorities within the LA area in relation to children wishing to join the normal year of entry during the primary/infant phase, junior or secondary phase in Swindon for September 2021.
- 2.2. Table 1 indicates the following information for each phase
 - 2.2.1. Relevant Year Group
 - 2.2.2. The relevant dates of birth for the normal point of entry
 - 2.2.3. The maximum number of preferences which can be made
 - 2.2.4. The date from when applications can be made
 - 2.2.5. The deadline for on-time applications
 - 2.2.6. The date when the LA will forward applications to other LAs and Swindon Admission Authorities
 - 2.2.7. The date by which Swindon Admission Authorities are required to return the ranked list of applications
 - 2.2.8. The deadline for changes of address
 - 2.2.9. The date when the LA will forward details of those offered a place to Swindon schools
 - 2.2.10. The date that parents will be notified in writing of the offer made
 - 2.2.11. The deadline for parents to accept the school place.
- 2.3. In Swindon, children can start school at the earliest from the September following their fourth birthday. Full time provision will be made available in all reception classes for all relevant children from September 2021.
- 2.4. Parents can defer the date their child is admitted to school until later in the school year but not beyond the point at which they reach compulsory school age² or, for children born between 1 April and 31 August, not beyond the beginning of the final term of the school year for which the offer was made;
- 2.5. Parents can also request that their child takes up the place offered part time until the child reaches compulsory school age.
- 2.6. The LA will publicise the coordinated admissions process for each phase of education. This will be done by:
 - publishing a composite prospectus online by 12 September 2021 for children due to start the Reception year and Junior School for the first time;
 - publishing a composite prospectus online by 12 September 2021 for children due to transfer from Year 6 in a junior or primary school to Year 7 in a secondary school called;
 - publicising coordinated admission arrangements on the LA public website;
 - producing posters and/or other advertising information;
 - making arrangements to enable parents to apply online;
 - Sending out information to early years providers including Child Minders to advertise the process
 - Sending information to all schools in Swindon about the process for them to send out to parents via newsletters, texts, and letter.
 - writing to parents of children regarding the possibility of transferring from Year 9 in a

² Compulsory school age is set out in section 8 of the Education Act 1996 and the Education (Start of Compulsory School Age) Order 1998. A child reaches compulsory school age on the prescribed day following his or her fifth birthday (or on his or her fifth birthday if it falls on a prescribed day). The prescribed days are 31 December, 31 March and 31 August.

secondary school to Year 10 in a Studio School or UTC.

- 2.7 The Governing Bodies or Academy Committees and/or Directors of OAA schools covered by the scheme remain responsible for setting admission rules, applying them and determining the offer of places. Where an OAA school consults on a change to its admission arrangements and/or rules, which it must at least once every seven years or when a change is made to those arrangements or rules (whichever happens sooner), it must consult, determine and publish according to the timescales laid down in the School Admissions Code 2014.
- 2.8 For all OAA schools, the parent will receive the official offer from the LA as the 'clearing house' made on behalf of the school or Governing Body or Academy Committee or Directors. Offers for the transfer phases listed in 2.8 above **must not** be sent directly by the school, Governing Body, Academy Committee, or Directors.

3. Making an application

- 3.1. Parents will be able to make an online application directly to Swindon Borough Council as the LA. The online facility will be available from 1 September 2020 (or nearest working day) up until the closing date indicated in **Table 1**. A paper form will also be made available.
- 3.2. The online application form will be known as the Swindon Local Authority (LA) Common Application Form used for the admission of pupils into the relevant year group.
- 3.3. Swindon Local Authority (LA) Common Application Form will be available for Swindon residents wishing to apply for a school place, either within or outside of the Borough of Swindon.
- 3.4. Swindon LA's Common Application Form, must be used as a means of expressing one or more preferences by a parent wishing to apply for a school place for their child either within or outside the Borough of Swindon. The child must live in Swindon.
- 3.5. Parents will be asked to express no more than 3 preferences in ranked order for schools both within and outside the Swindon Borough with the opportunity to express reasons for their particular preferences.
- 3.6. Parents are required to submit one application only per child. Where the LA receives more than one application for the same child before the closing date, the LA will only consider the latest submitted application and the other application will be discarded. If two late applications are received (after the closing date), the latest application by date will be the application considered.
- 3.7. Each preference will be considered equally. This means that Swindon LA will consider all applications against the published admissions criteria without reference to how the school applied for has been ranked on the application form. As far as possible applicants will be offered a place at a school to which they have expressed a preference. Where the applicant has made more than one preference the LA will make an offer at the highest ranked preference school with available places in accordance with the standard admission criteria. Where it is not possible to offer a place at a preferred school, and the applicant lives in Swindon, the LA will allocate a place at the next nearest school with a place, The distance between the applicant's home and school is taken as a straight line between the Local Land

and Property Gazetteer (LLPG) address point of the applicant's home address and of the school with those living closest to school receiving higher priority.

- 3.8. The governing body of a Foundation, Voluntary Aided School, Academy or Free School can ask parents who have expressed a preference for their school on the online Common Application Form, to provide additional information on a supplementary form or additional evidence, only if the additional information is required in order to apply their oversubscription criteria to the application. Where a supplementary form or additional evidence is required it is the responsibility of the parent to complete the form and return to the school concerned.
- 3.9. Where a school receives a supplementary form it may not be regarded as a valid application unless the parent has also completed a Common Application Form which expressed a preference for that school. The Common Application Form must have been returned to the LA.
- 3.10. Swindon LA must receive the application by the deadline date (by midnight) indicated in Table 1 (Row 5)

4. Application Process

- 4.1 The LA will consider in the first instance those applications received before the closing date.
- 4.2 Applications received after the closing will be considered as late. Applications can be submitted after this date but they will be considered as late for the purposes of the co-ordinated scheme. This means they will be considered after all on time applications. The LA will endeavour to deal with late applications before the offer date, but it may not be possible to do this in every circumstance.
- 4.3 Swindon LA will have forwarded applications for schools in other LA's to the maintaining LA's and forwarded applications to other admission authorities with any supporting evidence the parent submitted by the date indicated in Table 1 (Row 6).
- 4.4 Relevant information concerning a preference for a school as part of one of the transfers listed in 4.3 above, will be shared securely with other LAs where a preference has been requested for a school in that LA's area. This is in line with the General Data Protection Regulations and the 2018 Data Protection Act.
- 4.5 Foundation, Voluntary Aided Schools and Academies will apply their admissions criteria and send Swindon LA a list indicating the order in which all applicants have priority according to oversubscription criteria by the date indicated in Table 1 (Row 7).
- 4.6 Academies may choose to delegate the consideration of applications to the LA.
- 4.7 Swindon LA requires all evidence of changes in circumstances (e.g. proof of move / address) by the date indicated in Table 1 (Row 8).
- 4.8 Pupils with a statement of Special Educational Needs or an Education, Health and Care Plan (EHCP) will be admitted to the school named on their statement or plan. Applications of children with a statement or EHCP are considered by the Special Educational Needs Assessment Team (SENAT Team). Once a statement or plan reaches the formal proposed stage, this scheme does not apply as any placement is finalised by SENAT.
- 4.9 The LA will apply the agreed scheme and all applications for Community and VC schools will be considered using the oversubscription criteria for Community Schools and those lists provided by Swindon authorities and other LA schools. The LA will offer the highest rank available as indicated on the parent's application. Swindon will then compare the lists for all schools in the area. Where a child qualifies for one of the available places at more than one school, Swindon will provisionally allocate a place at the school ranked highest by the parent in their application. The lists will be adjusted for any other school for which a preference was expressed, moving another child who was previously not eligible for a place up the list to the provisional place that has been vacated.
- 4.10 Swindon LA will inform other LA's of offers made to their residents. Other LA's have responsibility to inform their residents.
- 4.11 If a child resident in Swindon remains unplaced Swindon LA will consider how to place them in schools within the area. Swindon LA will then offer places at the nearest available school (measured in a straight line) with places when children remain unplaced.

- 4.12 Children who have been refused a place at all of their named preferences, will be offered a place at an alternative school (excluding Catholic Schools unless agreed with the school's governing body) with a place available
- 4.13 Swindon LA will then offer places to late applicants subject to the places available and oversubscription criteria.
- 4.14 Swindon schools will be informed by Swindon LA of the final results by the date indicated in Table 1 (Row 9).
- 4.15 Offers will be made to parents by Swindon LA, on the national offer day (or the next working day where the national date is on a weekend). This date is indicated in Table 1 (Row 10).
- 4.16 Parents are only able to apply through the online system and those that have requested an email notification will be notified on the offer day. Parents / Carers that do not have access to this can contact the LA for assistance with this.
- 4.17 Those children refused places at higher preferences for Community or Voluntary Controlled schools will be placed on a waiting lists and informed of their right of appeal.
- 4.18 Parents must accept or refuse the place offered by the deadline indicated in Table 1 (Row 11)
- 4.19 Appeals against the refusal of a place at a preferred school will be heard within 40 school days of the closing date for appeals to be lodged. A timetable for appeals will be published on the Swindon Borough Council website by 28th February of the relevant year of admission.

5. In-year admissions

- 5.1 If parents/carers decide to transfer their children during the academic year after the normal admissions round, this is referred to as an In Year Transfer. Parents/carers who wish to transfer their child/ren in year to a Swindon school they must apply online on Swindon Borough Council's website and through the Boroughs In-Year Coordinated Scheme.
- 5.2 Please see the In Year Coordinated Scheme document for full details.

6. Sampling of Admission Applications to detect suspected fraud

- 6.1. The LA reserves the right to undertake sampling of applications as and when it determines necessary. All parents should be aware of this and therefore ensure that the information they submit on their application form is correct. By signing the application form, or submitting the form online, the parent is confirming that the information they have provided is correct.
- 6.2. If the LA undertakes sampling of applications, it will write to parents to ask that they submit proof of their address. Evidence of proof of address will be checked and parent will need to submit at least 2 of the following:
- Council Tax bill
 - Child Benefit letter
 - Child Tax Credit
 - Official Rental Agreement
 - Solicitor's letter (not older than one month).
 - Drivers Licence
 - Utility Bill
- 6.3 The LA may check the information given on the application form or the evidence submitted with other parties such as Council Tax or Electoral roll. Please note that the LA may do this at any time if they suspect fraud.
- 6.4 If evidence is not submitted, or the evidence is not sufficient, then the LA will either not consider the application as an on time application, which may have implications for the child being allocated their preferred school, or it may withdraw the offer of a school place, whichever is appropriate depending on the time the sampling is done. If a parent applies for a school place falsely (using false information), they will lose all the preferences stated on the application form and the whole application will become invalid. The application would then be treated as a late application. (A fresh application would need to be made which would be treated as a late application and if a place is refused at the preferred schools, the parents would have right of an appeal against the refusal.)
- 6.5 If the LA finds that fraud has been committed and the child has already started at the school, there may also be consequences for any other sibling of that child who may not be able to start at the preferred school.
- 6.6 If the LA withdraws a place for a child on the suspicion of fraud, the place will be reallocated.
- 6.7 If parents or schools suspect someone has applied fraudulently they should contact the Council on 01793 445500.

7. Definitions

Deferred admissions

Parents can request that the date that their child is admitted to school is deferred later in the academic year or until the term in which the child reaches compulsory school age. However, please note that the place must be taken up in the same academic year that it was originally offered and admission cannot be delayed beyond the statutory school start date. Notification of the intention to defer should be given directly to the school concerned as soon as possible once a place has been offered.

1st September 2016 and 31st December 2016

Admission will be September 2021 or can be deferred until January 2022

1st January 2017 and 31st March 2017

Admission will be September 2021 or can be deferred until January or April 2022

1st April 2017 and 31st August 2017

Admission will be September 2021 or can be deferred until January or April 2022

Delayed Admission of Summer born children

A summer born child is one born between 1st April and 31st August. A parent of a “summer born” child may request for their child to be deferred until they are statutory school age, that is that they may start school in Year 1 and not in the Reception Year. Please note that if the parent would like their child to start at the school allocated in Year 1 they would need to start school in the last academic term (April) for the place to be held for their child. Otherwise, the school place will be removed and the parent will need to make a new application for a school place in Year 1.

Parents of summer born children are also able to request for their child to be admitted to a year group later than that of their natural cohort. Please note that this is a request, and this will be considered by the Admitting Authority for the school.

Please see Appendix 1 to these arrangements, Delayed and Deferred Admissions.

Applications outside the Normal Age of Admission

Parents of gifted or talented children, or those who have experienced problems or missed part of a year, for example due to ill health, can seek places outside of their normal age group. Admission Authorities must make decisions on the basis of the circumstances of each case, informing parents of their statutory right to appeal. This right does not apply if they are offered a place in another year group of the school.

Evidence may be required in these circumstances from a Senior Medical Consultant, Educational Psychologist and/or other relevant professionals.

In the instance that the child has not started school (or is not statutory school age), or it is before the child needs to apply for a school place, the Admitting Authority for the school (LA for maintained schools or Governing Body of the School) may have discretion to decide whether the child would need to be put back an academic year on the circumstances outlined above. Evidence may be required in these circumstances from a Senior Medical Consultant and/or Educational Psychologist. This discretion would only be used in exceptional circumstances where it would

have to be proved that it was in the child's interest. This may have already been considered by the Special Educational Needs Assessment Team (SENAT) through the Early Years Panel.

Relevant Age Group

The age group to which children are normally admitted. Each relevant age group must have admission arrangements, including an admission number. Some schools (for example schools with sixth forms which admit children into the sixth form) may have more than one relevant age group.

Statement of Special Educational Needs (SEN)

A Statement of Special Educational Need is a statement made by the local authority under Section 324 of the Education Act 1996, specifying the special educational provision required for that child.

Education, Health and Care Plan

An Education, Health and Care plan is a plan made by the local authority under Section 37 of the Children and Families Act 2014 specifying the special education provision required for that child.

Proof of Address

The LA reserves the right to ask parents for proof of their address. If the parents' current address is different to that held on the LA's computerised system the LA may ask parents to provide proof of the new address if one is indicated. Acceptable proof of address includes:

- A copy of your Council Tax Bill
- A solicitor's letter stating contracts have been exchanged and specifying a completion date
- A copy of the Child Tax Credit or Working Tax Credit award letter
- A signed and dated tenancy agreement plus proof of residency (e.g. copy of recent utility bill)

If parents fail to provide proof of a new address then, the LA will use the old address for admission purposes. If parents indicate they will be moving house, even if they provide the relevant proof of that address, they must move into that property by at least the end of the first term. The LA reserves the right to check that parents are living in the address indicated within that timescale. If parents are not living in that address, the applications will be investigated and the place allocated may be withdrawn

Applications

Online Common Application Form

For the normal admissions round, an online Common Application Form (CAF) must be completed by all parents applying for Admission for 2021-22. All parents who list their preferred schools on the LA's CAF are regarded to as having made a valid application.

In-year admission application

For in-year applications, the online Swindon In-year application form must be completed by all parents applying for Admission applying to transfer during the 2021-22.

Supplementary forms and additional evidence / information

An additional supplementary form (SIF) or additional evidence may be required by an Academy, Foundation or Voluntary Aided school who require additional information in order to consider the application, this is available from the school. This may be for in-year and normal admissions round.

Children from Overseas

Children who hold a full British Citizen passport or children whose passport has been endorsed to show they have a right of abode in the country are entitled to apply for a place at a maintained school. The passport or visa should be made available for inspection before an offer of a school place can be made. Asylum Seekers should make available evidence of their right of abode as provided by the National Asylum Support Service.

During the normal admissions round applications on behalf of children currently living outside the UK will be considered, but until the children are resident in the country of their home address will be considered as being their place of residence outside the UK. Exceptions to this would be instances where the children are of parents returning from foreign postings such as UK service personnel and other crown servants as indicated above (including diplomats) who have been posted abroad on a fixed term contract and who are returning to live within the UK. Proof of future residency will be required if the application is made to an oversubscribed school.

For in-year applications, with the exception of UK service personnel as indicated above, applications for in-year places will only be accepted once the child is permanently resident within the country.

Duplicate Applications

The LA requires parents to submit one application only per child. Where the LA receive more than one application for the same child before the closing date, the LA will only consider the latest submitted application and the other application will be discarded. If two late applications are received (after the closing date), the latest application by date will be the application considered.

Late applications

The closing date for applications is defined in Table 1. Applications can be submitted after this date but they will be considered as late for the purposes of the coordinated scheme. This means they will be considered after all the on time applications. The LA will endeavour to deal with late applications before the offer date, but it may not be possible to do this in every circumstance.

Preferences

Parents will be invited to state up to three ranked preferences. Each preference will be considered equally. This means that Swindon LA will consider all applications against the published admissions criteria without reference to how the school applied for has been ranked on the application form. As far as possible applicants will be offered a place at a school to which they have expressed a preference. Where the applicant has made more than one preference the LA will make an offer at the highest ranked preference school with available places in accordance with the standard admission criteria. Where it is not possible to offer a place at a preferred school, and the applicant lives in Swindon, the LA will allocate a place at the next nearest school with a place.

The next nearest school with a place will relate to any maintained mainstream school, whether it be Community, Voluntary Aided, Voluntary Controlled, Foundation, Academy or Free School (excluding Catholic Schools unless agreed with the school's governing body).

Change of preference

A parent may change their mind about the preferences they have made after the closing date indicated in Table 1, if they have a genuine reason for doing so, which may be that they are moving house. The Admissions Team would need any request to change a preference in writing from the parent. Any change in preference received after the deadline for ontime applications, regardless of the circumstance, will be considered as a late application.

Any evidence that is needed to accompany the change in preference would be required to be with the Admissions Team by the deadline for address changes in Table 1 (Row 8).

8. Swindon Schools

Primary, Infant and Junior Schools

School Name	Type of School
Abbey Meads Community Primary School	Academy
Badbury Park Primary School	Academy
Beechcroft Infant School	Community
Bishopstone CE Primary School	Voluntary Controlled
Bridlewood Primary School	Community
Brook Field Primary School	Community
Catherine Wayte Primary School	Community
Chiseldon Primary School	Community
Colebrook Infant Academy	Academy
Colebrook Junior School	Community
Covingham Park Primary School	Community
Drove Primary School	Academy
East Wichel Community Primary School	Community
Eastrop Infant Academy	Academy
Eldene Primary School	Community
Even Swindon Primary School	Community
Ferndale Community Primary School	Academy
Goddard Park Primary School Academy Trust	Academy
Gorse Hill School	Academy
Grange Infant School	Academy
Grange Junior School	Academy
Greenmeadow Primary School	Community
Haydon Wick Primary School	Academy
Haydonleigh Primary School	Community
Hazelwood Academy	Academy
Holy Cross Catholic Primary School	Academy
Holy Family Catholic Primary School	Academy
Holy Rood Catholic Primary School	Academy
King William Street CE Primary School	Academy
Lainesmead Primary School	Community
Lawn Primary School	Community
Lethbridge Primary School	Academy
Liden Primary School	Community
Millbrook Primary School	Academy
Moredon Primary School	Academy
Mountford Manor Primary School	Academy
Nythe Primary School	Community
Oakhurst Primary School	Community
Oaktree Primary School	Community
Oliver Tomkins CE Infant School	Voluntary Aided
Oliver Tomkins CE Junior School	Voluntary Aided
Orchid Vale Primary School	Community
Peatmoor Primary School	Academy
Red Oaks Primary School	Academy
Robert Le Kyng Primary School	Community
Rodbourne Cheney Primary School	Academy
Ruskin Junior School	Academy
Seven Fields Primary School	Academy
Shaw Ridge Primary School	Academy

Southfield Junior School	Academy
South Marston CE Primary School	Academy
St Catherine's Catholic School	Academy
St Francis CE Primary School	Voluntary Aided
St Leonards' Primary Academy	Academy
St Mary's Catholic Primary School	Academy
Swindon Academy	Academy
Tadpole Farm Church of England Primary Academy	Academy
The Croft Primary School	Academy
Tregoze Primary School	Academy
Wanborough Primary School	Community
Westlea Primary School	Academy
Westrop Primary School	Community
William Morris Primary School	Academy
Wroughton Infant School	Community
Wroughton Junior School	Community

Secondary Schools

School Name	Type of School
Lawn Manor Academy	Academy
Highworth Warneford School	Academy
Abbey Park Academy	Academy
Kingsdown School	Academy
Lydiard Park Academy	Academy
Nova Hreod Academy	Academy
St Joseph's Catholic College	Academy
Swindon Academy	Academy
The Commonweal School	Academy
The Dorcan Academy	Academy
The Ridgeway School	Academy
Great Western Academy	Academy
The Deanery	Academy
University Technical College	University Technical College

9. Appendices

9.1. Appendix 1 – Delayed and Deferred Admissions



School Admission Arrangements
(Community and Voluntary Controlled Schools)
2021-22

Admission Arrangements 2021-22 (Community and Voluntary Controlled Schools)

1. Introduction

This policy applies solely to applications for places at Community and Voluntary Controlled (VC) schools in Swindon. Foundation, Voluntary Aided (VA) and Academy Schools are their own admission authorities and therefore the Governing Bodies of the schools are responsible for determining their own admission arrangements and policies.

This document should be read in conjunction with the Co-ordinated Scheme for 2021-22, and the In Year Coordinated Scheme 2021-22 which applies to all schools within the Swindon LA area.

The closing dates for applications are:

Primary, Infant and Junior – 15th January 2021 and offers are made on 16th April 2021
Secondary - 31st October 2020 and offers are made on 1st March 2021

Applications must be made for children transferring from nursery to infant or primary school and for children transferring from infant to junior school.

2. Oversubscription Criteria

If there are more applications than there are places at the school, then the oversubscription criteria are applied.

The over-subscription criteria for all Swindon Community and Voluntary Controlled Schools are as follows:

A child who has a statement of special educational needs or Education, Health and Care Plan (EHCP) is required to be admitted to the school named on the child's statement.

A	A looked after child or previously looked after child. <i>Previously looked after children are children who were looked after, but ceased to be so because they were adopted (or became subject to a child arrangements order or special guardianship order)</i>
B	Any child who has a sibling attending the preferred school at the same time as he or she is due to be admitted;
C	Any child living within the school's catchment area;
D	Any child not living in the school's catchment area.

Decider

For Community and Voluntary Controlled schools distance will be determined from the applicant's home address to the school on the following basis –

The distance between the applicant's home and school is taken as a straight line between the Local Land and Property Gazetteer (LLPG) address point of the applicant's home address and of the school with those living closest to school receiving higher priority.

Children with statements of special educational needs or Education, Health and Care Plan

Pupils with a statement of special educational needs or Education, Health and Care Plan at the time of allocation are required to be admitted to the school named on their statement or plan. Once a statement reaches the formal proposed stage the administration of the admission of the young person becomes the responsibility of Special Educational Needs Assessment Team (SENAT) at which point this policy no longer applies.

Looked After Child

Looked After Child

A 'Looked After Child' is a child who is:

- (a) in the care of a local authority, or
- (b) being provided with accommodation by a local authority in the exercise of their social services functions (see the definition in section 22(1) of the Children Act 1989) at the time of making an application to a school.

This also applies to a 'Looked After Child' or a child who was previously looked after but immediately after being looked after became subject to an adoption, child arrangements or special guardianship order. If children have ever been Looked After or Adopted or subject to a residency or special guardianship order evidence would need to be provided and the LA reserve the right to ask the parent to provide this.

A 'previously looked after child' is a child who:

- (a) ceased to be looked after because they were adopted (under the Adoption Act 1976 (see section 12 adoption orders) and children who were adopted under the Adoption and Childrens Act 2002 (see section 46 adoption orders).
- (b) became subject to a child arrangements order (defined in s.8 of the Children Act 1989, as amended by s.12 of the Children and Families Act 2014) or
- (c) became subject to a special guardianship order (see Section 14A of the Children Act 1989 - an order appointing one or more individuals to be a child's special guardian (or special guardians)).

Sibling

A sibling is defined as a child attending the preferred school at the same time as he or she is due to be admitted, who is a;

- brother or sister;
- half brother or sister;
- adopted brother or sister;
- step brother or sister, or
- the child of the parent/carer's partner where the child for whom the school place is sought is living in the same family unit at the same address as that sibling.

Where the sibling of the child making the application is under assessment for a Statement of Special Educational Needs or Education Health and Care Plan, then they will be counted as a sibling from the time that the school is named on the final plan.

Catchment area

A catchment area is a geographical zone served by a school. The address that determines a child's catchment area is the place where s/he is ordinarily resident with his/her parent(s) or legal guardian(s). Most schools have a catchment area but some addresses fall within areas shared by two or more schools. Children living outside the Borough boundary are treated as if the children live within Swindon but outside the catchment area for the school(s) in question. Maps of each catchment area are held by the LA and can be viewed on request or on the council's website

Distance

In all cases where schools are oversubscribed, distance is as a straight line between the Local Land and Property Gazetteer (LLPG) address point of the applicant's home address and of the school within each oversubscription criteria. If the direct distance measurement does not separate applicants, places will be offered by random allocation.

3. Other definitions

Address

Home address

The home address given on the application form must be the address where the child resides for most of the week with his or her parent or carer. The LA will not accept more than one address as the child's home address. The terms of a residency order may clarify the home address. Where necessary to determine which address to recognise and in the absence of a residency order, the LA will consider the home address to be with the parent with primary day to day care and control of the child.

In reaching this decision, evidence may be requested to show the address to which any Child Benefit is paid and from which the child is registered with a medical GP. If the Child Benefit letter is not available, a copy of the most recent bank statement where the Child Benefit is credited may be taken as residency, or the address stated on the NHS Medical Card of the child. Any other evidence provided by parents will also be considered by the Admissions Manager in reaching a decision on the home address for admissions purposes. This may be necessary for instance where parents do not agree on the child's home address. Parents are urged to reach agreement but where they do not, the LA will determine the home address.

Applications

An application for a place at a primary or secondary school for September 2021 must be made online using the Local Authority's online common application form. This is made via the Council's online admission system.

Children of UK Service Personnel

Applications for children of service personnel with a confirmed posting to the area will be considered in advance of the family arriving in the area provided the application is accompanied by an official letter from the commanding officer that declares a relocation date and a Unit postal address or quartering area address. Until a fixed address is provided, the LA will accept the Unit Postal Address or Quartering address as the Home Address for allocation purposes. All

applications must be included in the normal admissions round if possible. The LA will not refuse a service child a place because the family does not currently live in the area, and will not reserve blocks of places for these children.

An in-year application will be considered in the normal way and if a reasonable alternative cannot be offered, the child may be admitted as an 'excepted pupil' under the School Admissions (Infant Class Sizes) (England) Regulations 2012. In circumstances where placing a child at a school that is deemed a reasonable alternative would mean admitting above the PAN, the LA will take into account the organisational structure of the school to determine whether it is the best interests of the child and children already attending the school.

A reasonable alternative is defined as a school which is within the statutory maximum walking distance of 2 miles for a child who is under 8 years old and 3 miles for a child who is over 8 years old.

Late applications

Applications received after the closing date will be considered as late applications. This means that they will be considered after all on-time applications have been considered. This applies to primary applications received after 15th January 2021 and secondary applications received after 31st October 2020.

Multiple births

The LA will endeavour to place siblings born at the same time (e.g. twins, triplets etc.) at the same school, if necessary the school will admit over its PAN to accommodate such children. In the case of Infant Class Sizes (Reception, Year 1 and Year 2) class sizes must not contain more than 30 pupils with a single school teacher, however, additional children may only be admitted in limited exceptional circumstances, and in accordance with the School Admissions Code, twins and children from multiple births are classed as 'excepted pupils' to this legislation. Therefore, if one child of a multiple birth is offered the last available space at the school (according to the PAN), then offers will be made to all the children of that particular multiple birth. Those children would remain an exception to infant class size for the entire time they are in an infant class or until the class numbers fall back to the current infant class size limit.

Parent/carer

This is defined as a person with parental responsibility (PR) or legal residency of the child. This could include a person who is not a parent but who has a Court Order giving parental responsibility to them.

Shared responsibility

Where two adults have shared responsibility for a child they should agree before submitting an application form which school(s) to name as their preference(s). In cases of dispute, or where two applications from the adult with whom the child is living are received, the LA will ask parents to agree on the school applied for, or if that is not possible the LA will ask the parent to seek a Specific Issues Order through the Courts to gain the authority to make an application.

In the absence of a parental agreement or either of the parents obtaining a Court order determining the issue, the LA will be required to decide which preference(s) to be recorded and this will be done by using the application made by the person who lives at the property where the child is resident at their home address as defined below

(In reaching a decision on the address to use as the 'home address', evidence may be requested to show the address to which any Child Benefit is paid and from which the child is registered with a medical GP. Any other evidence provided by parents will also be considered by the Admissions Manager in reaching a decision on the home address for admissions purposes.)

Applications outside the Normal Age of Admission

Parents of gifted or talented children, or those who have experienced problems or missed part of a year, for example due to ill health, can seek places outside of their normal age group. Admission Authorities must make decisions on the basis of the circumstances of each case, informing parents of their statutory right to appeal. This right does not apply if they are offered a place in another year group of the school.

Evidence may be required in these circumstances from a Senior Medical Consultant, Educational Psychologist and/or other relevant professionals.

In the instance that the child has not started school (or is not statutory school age), or it is before the child needs to apply for a school place, the Admitting Authority for the school (LA for maintained schools or Governing Body of the School) may have discretion to decide whether the child would need to be put back an academic year on the circumstances outlined above. Evidence may be required in these circumstances from a Senior Medical Consultant and/or Educational Psychologist. This discretion would only be used in exceptional circumstances where it would have to be proved that it was in the child's interest. This may have already been considered by the Special Educational Needs Assessment Team (SENAT) through the Early Years Panel.

Deferred admissions

Parents can request that the date that their child is admitted to school is deferred later in the academic year or until the term in which the child reaches compulsory school age. However, please note that the place must be taken up in the same academic year that it was originally offered and admission cannot be delayed beyond the statutory school start date. Notification of the intention to defer should be given directly to the school concerned as soon as possible once a place has been offered.

1st September 2016 and 31st December 2016

Admission will be September 2021 or can be deferred until January 2022

1st January 2017 and 31st March 2017

Admission will be September 2021 or can be deferred until January or April 2022

1st April 2017 and 31st August 2017

Admission will be September 2021 or can be deferred until January or April 2022

Delayed Admission of Summer born children

A summer born child is one born between 1st April and 31st August. A parent of a "summer born" child may request for their child to be deferred until they are statutory school age, that is that they may start school in Year 1 and not in the Reception Year. Please note that if the parent would like their child to start at the school allocated in Year 1 they would need to start school in the last academic term (April) for the place to be held for their child. Otherwise, the school place will be removed and the parent will need to make a new application for a school place in Year 1.

Parents of summer born children are also able to request for their child to be admitted to a year group later than that of their natural cohort. Please note that this is a request, and this will be considered by the Admitting Authority for the school.

Please see Appendix 1 to these arrangements, Delayed and Deferred Admissions.

Published Admissions Number

A Published Admission Number (PAN) is agreed for each school annually and defines the number of places available for the year of entry. All applications must be agreed until the PAN has been reached.

Waiting lists

Waiting lists will be maintained for all Community and Voluntary Controlled schools from the initial point of entry until the end of that academic year. For the September 2020 intake this will be from the national offer date until 31st August 2022.

For all other year groups (Years 1 – 6 and 8-11) the waiting list will be discarded on 31st August 2021 and new applications will be invited from 1st September 2021.

Placement will be determined by applying the oversubscription criteria published in the Admissions Guide. Names will be removed from the lists if requested or if the offer of a place that becomes available is not accepted. Positions on waiting lists may change due to new applications received.

Waiting lists for Foundation, Voluntary Aided Schools and Academies are outlined in the individual schools own admission arrangements.

Placing a child's name on a waiting list does not affect the parents' right of appeal against an unsuccessful application.

Parents may only apply and appeal once per school per academic year. The LA may consider a fresh application if there is a significant and material change in circumstances of the parent, child or school since the original application was made. An example of this may be that the family have moved house.

Appeals procedure

Parents have a right of appeal to an independent panel against any decision made by or on behalf of the LA as to the school at which education is to be provided for their child. Information about the appeal procedure will be provided where a place at one or more of the preferred schools has been refused.

For appeals for September 2021 a timetable for hearing appeals will be published by 28th February 2021 and be available on the relevant schools or Local Authority website. Appellants should contact the Admissions Team to obtain an appeal form, which should be returned to Appeals Clerk at Civic Offices, Euclid Street, Swindon, SN1 2JH.

In-year admissions

- 3.1 If parents/carers decide to transfer their children during the academic year after the normal admissions round, this is referred to as an In Year Transfer.
- 3.2 The LA has a coordinated In Year Admissions Scheme and all Community and Voluntary Controlled Schools are part of this scheme for September 2021-22.
- 3.3 Please refer to the In Year Coordinated Admissions Scheme for more information on this.

4. Published Admission Numbers

The following list of schools are community and voluntary controlled which the Local Authority is the admission authority. The Local Authority are consulting upon the admission number for the 2020-21 academic year. The Published Admission number (PAN) applies to the relevant year group for admission in September 2021-22 and these are in the table below.

School Name	Type of School	Published Admission Number 2020-21	Published Admission Number 2021-22
Beechcroft Infant School	Community	90	90
Bishopstone CE Primary School	Voluntary Controlled	8	8
Bridlewood Primary School	Community	30	30
Brook Field Primary School	Community	60	60
Catherine Wayte Primary School	Community	60	60
Chiseldon Primary School	Community	30	30
Colebrook Junior School	Community	50	50
Covingham Park Primary School	Community	60	60
East Wichel Community Primary School	Community	60	60
Eldene Primary School	Community	60	60
Even Swindon Primary School	Community	90	90
Greenmeadow Primary School	Community	40	40
Haydonleigh Primary School	Community	90	90
Lainesmead Primary School	Community	60	60
Lawn Primary School	Community	60	60
Liden Primary School	Community	60	50
Nythe Primary School	Community	30	30
Oakhurst Primary School	Community	60	60
Oaktree Primary School	Community	55	55
Orchid Vale Primary School	Community	60	60
Robert Le Kyng Primary School	Community	60	60
Wanborough Primary School	Community	30	30
Westrop Primary School	Community	45	45
Wroughton Infant School	Community	90	90
Wroughton Junior School	Community	90	90

5. Appendices



5.1 Appendix 1 – Delayed and Deferred Admissions

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School Admission Arrangements 2021-22, and Mainstream Home to School Transport Policy 2021-22

1. Privacy Statement



2. School Admission Arrangements - Community and Voluntary Controlled Schools

1. Do you agree with the Proposed School Admission Arrangements for 2021-22 for Community and Voluntary Controlled Schools?							
						Response Percent	Response Total
1	Yes					83.33%	5
2	No					16.67%	1
Analysis	Mean:	1.17	Std. Deviation:	0.37	Satisfaction Rate:	16.67	answered
	Variance:	0.14	Std. Error:	0.15			skipped
Comments: (1)							
1	11/12/2019 18:54 PM ID: 132423557	Haven't looked at them. I am here for the SEND transport policy.					

3. Coordinated Admissions Scheme

2. Do you agree with the proposed Coordinated Admissions Scheme for 2021-22?							
						Response Percent	Response Total
1	Yes					83.33%	5
2	No					16.67%	1
Analysis	Mean:	1.17	Std. Deviation:	0.37	Satisfaction Rate:	16.67	answered
	Variance:	0.14	Std. Error:	0.15			skipped

4. In Year Coordinated Admissions Scheme

3. Do you agree with the proposed In Year Coordinated Admissions Scheme for 2021-22?							
						Response Percent	Response Total
1	Yes					83.33%	5
2	No					16.67%	1
Analysis	Mean:	1.17	Std. Deviation:	0.37	Satisfaction Rate:	16.67	answered
	Variance:	0.14	Std. Error:	0.15			skipped

5. Mainstream Home to School Transport Policy 2021-22

4. Do you agree with the Mainstream Home to School Transport Policy for 2021-22?

							Response Percent	Response Total	
1	Yes			<div></div>			100.00%	6	
2	No						0.00%	0	
Analysis	Mean:	1	Std. Deviation:	0	Satisfaction Rate:		0	answered	6
	Variance:	0	Std. Error:	0				skipped	0

7. Designated Transport Areas 2021-22

6. Do you agree with the Designated Transport Areas for 2021-22?

							Response Percent	Response Total
1	Yes			<div></div>			83.33%	5
2	No			<div></div>			16.67%	1
Analysis	Mean:	1.17	Std. Deviation:	0.37	Satisfaction Rate:	16.67	answered	6
	Variance:	0.14	Std. Error:	0.15			skipped	0
Comments: (1)								
1	11/12/2019 18:54 PM ID: 132423557		Didn't look only interested in the SEND travel policy.					

8. Respondent Details



7. Please tick the box that best describes you:

				Response Percent	Response Total
1	I am a parent / carer of a child at Primary, Infant or Junior School in Swindon			33.33%	2
2	I am parent / carer of a child at a Secondary School in Swindon			16.67%	1
3	I am a parent of a child in a School outside of Swindon			0.00%	0
4	I represent a Primary, Infant or Junior School in Swindon			50.00%	3
5	I represent a Secondary School in Swindon			0.00%	0
6	I represent a School outside of Swindon			0.00%	0
7	I am a Parish, Town or Ward Councillor for Swindon Borough			0.00%	0


7. Please tick the box that best describes you:

						Response Percent	Response Total
	Council						
8	other					0.00%	0
Analysis	Mean:	2.67	Std. Deviation:	1.37	Satisfaction Rate:	23.81	answered 6
	Variance:	1.89	Std. Error:	0.56			skipped 0

9. Do you consider yourself to have a disability?

						Response Percent	Response Total
1	Yes					16.67%	1
2	No					83.33%	5
Analysis	Mean:	1.83	Std. Deviation:	0.37	Satisfaction Rate:	83.33	answered 6
	Variance:	0.14	Std. Error:	0.15			skipped 0

10. What do you consider, best describes your ethnicity?

						Response Percent	Response Total
1	White British					100.00%	6
2	White European					0.00%	0
3	White Other					0.00%	0
4	Black African					0.00%	0
5	Black British					0.00%	0
6	Black Caribbean					0.00%	0
7	Black Other					0.00%	0
8	Asian Indian					0.00%	0
9	Asian Bangladeshi					0.00%	0
10	Asian British					0.00%	0
11	Asian Pakistani					0.00%	0
12	Asian Other					0.00%	0
13	Mixed White & Black Caribbean					0.00%	0
14	Mixed White & Asian					0.00%	0
15	Mixed White and Black African					0.00%	0
16	Mixed Other					0.00%	0
Analysis	Mean:	1	Std. Deviation:	0	Satisfaction Rate:	0	answered 6
	Variance:	0	Std. Error:	0			skipped 0

Response from St Joseph's Catholic College:

Comment	LA response
<p><i>Summer Born Children</i>- it is not clear who makes the decision on whether or not a summer born child is placed outside of the natural cohort. It is the decision of the admission authority</p>	<p>The proposed delayed and deferred admissions appendix (appendix 1 to the Coordinated Admissions Arrangements) is clear that the Admitting Authority for the school makes the final decision concerning a request to delay – Section 6 of this appendix clarifies this position.</p>
<p><i>Proposed in year coordinated scheme</i></p>	
<p>Point 1.1 and 1.2 it is not clear what process will be followed for if an (Other Admissions Authority) OAA opts out of the scheme. The key point is if the admissions team receive an application for an OAA outside of the scheme how and the timeframe in which this will be transferred.</p>	<p>Section 4 of the In Year Coordinated Scheme refers to Own Admitting Schools that have opted out of the scheme.</p> <p>In essence if an OAA opts out of the scheme there will be a separate Admissions Application form with 1 preference for parents to complete and send directly to the OAA school.</p> <p>We have added in information to the scheme to state that if the LA receives an application in error for a school that has opted out of the scheme, the LA will pass this on to the OAA as soon as possible or within 5 school days.</p>
<p>Para 2.5. The second sentence states that only information relevant to the application will be sent to schools. However, coincidentally para 2.4 of the School Admissions code states that supplementary forms must only request additional information that has a direct bearing on the decisions. This is because OAA's should have access to the information on the CAF including the applicants contact details.</p>	<p>Admission Authorities must only consider information that is relevant to the child gaining a place at the school, i.e. any information that is pertinent to the schools oversubscription criteria. Parent's names or contact details are not relevant to the allocation of a place as these details have no bearing on whether the child could be allocated a place at the school or not.</p> <p>2.4 of the School Admissions Code states' in some cases, admission authorities will need to ask for supplementary information forms in order to process applications. If they do so, they must only use supplementary forms that request additional information when it has a direct bearing on decisions <i>about oversubscription criteria</i> or for the purpose of selection by aptitude or ability.</p>

	<p>The School Admissions Code does not state that the LA must pass on all information that is on the application form, it must only pass on what is relevant to making the decision.</p> <p>However, the LA's new Admissions Portal, which will be available to all schools that are part of the In Year Coordinated Scheme, will allow schools to view the entire application (preferences for other schools exempt). For in year admissions this will not be available for schools that opt out because the portal is only available for applications made on line direct to the LA.</p>
<p>Para 2.7 It would be preferable that the proposed calendar of date was included as part of the consultation as it is impossible to feedback on any dates which are incompatible.</p>	<p>The LA develops the In Year Calendar of dates every year in consultation with all schools in the Borough that are part of the in year scheme and have taken into account schools requests to move dates where possible. The LA will continue to do this working with all schools in the Borough.</p>
<p>Para 2.10 This is contrary to advice received where OAA's must consider all information available at the time of consideration.</p>	<p>The advice to OAA schools with regards to Supplementary Information Forms (SIF's) and completion of the online admissions application, has always been that a valid application is one where the online admissions application is completed on time before the closing date. Some schools also require a SIF to be completed to gather additional information that is relevant to their oversubscription criteria. If the Admitting Authority requires a SIF, but a parent has only completed an application form, the school can only consider the information on the form. When the parent submits a SIF to the school, the school can reassess the application and if relevant could consider the application under higher / lower criteria. Admitting Authorities can only consider the information submitted at the time of the application form and by the closing date.</p>

Para 2.11 This paragraph may need to make a reference to the process if an OAA opts out of the coordinated scheme.	We have clarified this in section 2.11.
Para 3.7 OAA's are able to offer over PAN. Also for an OAA to rank all applications each cycle when there are no places available is a waste of resource.	<p>OAA schools are able to admit over the PAN and if a school was part of the in year scheme and wished to do so they could let the LA know this. This happens presently.</p> <p>Ranking the applications submitted to the school against the schools oversubscription criteria, means that the schools governing body has considered the applications and this means the application can be refused or offered a place. If no places are available, it ensures that the applications are refused and a refusal letter is sent out on behalf of the school as part of the in year scheme. It also ensures that the children are then placed on the waiting list according to that rank given. If no rank is given no refusal letter is sent, no place is therefore given on the waiting list for the school (if they have one) and no right of appeal is given. If schools are not ranking applications when there are no places available as part of the in year scheme the LA would question as to whether the school is considering the application and sending a refusal letter.</p>
Para 3.13 It is difficult to see how a place can be reserved and the College believes that this needs more consideration.	This is in the scheme to try to ensure that parents are given a school place that is closest to home, and to speed up the process for a parent that will need to apply for schools through the in year scheme, and then to schools directly that are not part of the scheme. The LA will ask the OAA if this can be reserved, but if this is not possible (perhaps due to the fact that the Governing Body meeting is not for some time) then the LA will advise the parent to make an application to the school directly.
Para 3.14 Currently OAA's are able to send out own offer letters too. Is there a reason for this change?	There is no change to this. OAA schools are still able to do this. This paragraph states that OAA must not send out an offer / refusal letter <i>until</i> the LA has sent formal written notification –

	as part of being in the in year scheme there is no need for an OAA to send a separate decision letter.
Para 3.15 What is the process if the child was living in another part of the UK?	We have clarified this in the policy.
Para 3.16 The second sentence states that a child should start at a school by a certain date. Can you clarify please if this is part of the withdrawal of a place process?	This is stated so that places at schools are not held for long periods of time, preventing other children from accessing them. Usually places are taken up immediately, but in the minority of cases this allows an admitting authority to define what is a reasonable amount of time for a parent to take up a school place.
Para 3.21 A small point but indicates that the LA will consider applications rather than LA and OAA's.	This is in relation to schools that are part of the in year scheme.
Para 3.22 Currently information on when a child leaves is included in the vacancy spreadsheet and to the EWO. Can it be clarified who needs to be informed and when by.	As stated in 3.22 the LA will need to be informed when a child has started / left the school via the Vacancy spreadsheet so that the information per school is correct and the correct number of places can be offered.
Para 4.2 The school admissions code does not provide for OAA's notifying the LA of in year applications on the day and could be difficult to manage if applications are received outside of normal working hours, by electronic means for example.	This has been amended to stated 'as soon as possible, but within 5 school days' to take account of this.
Para 4.3 The school admissions code does not require a copy of the letter to be provided to the Swindon admissions team but rather to notify of the application and provide the outcome.	Paragraph 2.22 of the School Admissions Code states: Own admission authority schools must , on receipt of an in-year application, notify the local authority of both the application and its outcome, to allow the local authority to keep up to date figures on the availability of places in the area. The admission authority must also inform parents of their right to appeal against the refusal of a place. Although the Code does not state that the form or copy of the decision letter should be sent to the LA, this information would enable the LA to have as much information as possible on the child in the area and to ensure that the parent has applied for a school place through the in year scheme as

	<p>well / at the same time to speed up the process and ensure the child is not out of school for more time than necessary. It would also enable the LA to speed up any other referral for example to Fair Access Panel etc. This is best practice and we would hope that the OAA school would cooperate and engage with the LA on this</p>
<p>Para 4.4 There is no obligation to provide details of the waiting list to the applicant.</p>	<p>This is not referred to in Section 4.4. However, if an OAA school holds a waiting list then it is good practice to advise parents of the practice of holding a waiting list, how it operates etc, in a decision letter especially if the child has been refused. Parents will then know to ask what position their child might be on the waiting list and can be better informed of their options</p>
<p>Para 4.5 Suggest that some further detail on how applications are shared.</p>	<p>This has been added to the scheme.</p>
<p>Para 4.6 There is no obligation in the code to provide the information on places on a certain date and it is difficult to agree to do this without the calendar being made available.</p>	<p>Whilst we appreciate there is no requirement in the Admissions Code to provide the information on numbers on a certain date, it is recognised by the DfE that LA's need this information to be able to advise parents.</p> <p>As all schools have been participating in the in year coordinated scheme since September 2017 and informing the LA of the number of places per year group on certain dates per month in the in year scheme, it is proposed that this practice continues as schools are familiar with this and it does not provide any additional burden to schools.</p> <p>It would also be useful to know when schools have their Admissions Panels / Governor meetings scheduled so that the LA can inform parents.</p>
<p>Para 4.8 similarly to the point on para 3.22, further clarity on the process would be welcomed.</p>	<p>In relation to school places the LA would like a list of all the number of places per year group against the schools PAN, via spreadsheet electronically. This is currently provided by all schools through the current in year process, and so is no additional</p>

	burden to schools.
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**In Year Coordinated School Admissions Scheme for
Reception to Year 11**

2021-22

In-Year Coordinated School Admissions Scheme - September 2021-22

- 1.1 The scheme covers admissions for entry to all Community and Voluntary Controlled, Academy, Free School, Voluntary Aided, and Foundation schools in Swindon outside the normal admissions rounds for children transferring between phases of education (see the Coordinated Admissions Scheme for more details) for entry to year groups Reception through Year 11 (inclusive).
- 1.2 An Own Admitting Authority School (OAA) may opt out of this scheme but must inform the LA in writing by the last working day in February 2020 so that details can be published in the Scheme and online by 15 March 2020. Any school that opts out would be doing so from 2021 and would need to consult on this in the normal way.
- 1.3 Any OAA school that has withdrawn from the Scheme must adhere to the requirements set out in Part 4 of this Scheme.
- 1.4 A list of OAA schools in Swindon that are not part of the Scheme will be published online by 15 March 2020 and as part of the determined Scheme.
- 1.5 Applications outside the normal round of admissions (see the Coordinated Admissions Scheme) will be referred to in the Scheme as “in-year applications”.
- 1.6 The Local Authority (LA) has delegated the responsibility for admissions to Sixth Form (Years 12 and/or 13) to schools to administer locally. Parents should apply direct to schools for Sixth Form places.
- 1.7 The LA will coordinate in-year admissions to all mainstream schools in Swindon that are part of the Scheme. Therefore, applications from both residents and non-residents of Swindon for places in schools in Swindon that are part of the Scheme must be made to the LA. If Swindon residents wish to apply for a place outside of Swindon they will need to apply to the school / or that Local Authority directly, and not through this system
- 1.8 The Governing Bodies or Academy Committees of OAA schools that are part of the Scheme remain responsible for setting admission rules, applying them and determining the offer of places. The LA **will not** make admissions decisions on behalf of OAA schools.

2. The Application:

- 2.1 Parents must apply online using the Swindon Borough Council’s online system at https://www.swindon.gov.uk/info/20071/school_places_and_admissions/422/changing_or_transferring_to_a_swindon_school . Parents can also apply using a paper form if they cannot complete the online form.
- 2.2 Parents will be able to request a maximum of 3 preferences on their application. These preferences can be for any mainstream school in Swindon that is part of the Scheme.

- 2.3 If parents are moving into Swindon they will need to provide proof of their address (see definitions below) and submit this at the time they submit their application. The Admissions Team will need the proof of address by the closing date. If the evidence is not provided the application will be considered on the current address and this may impact the consideration of the application in terms of the oversubscription criteria.
- 2.4 All applications will be considered under the Equal Preference Scheme and therefore all preferences will be considered at the same time. This speeds up the consideration of each application as every parent will have an offer / refusal on the entire application (all 3 preferences). Under the Equal Preference Scheme, places will be offered to the highest preference possible
- 2.5 Information regarding children's applications will be sent electronically to schools. This is only information that is relevant to the consideration of the application.
- 2.6 All applications will be considered in process periods (batches) and not individually in preference order. The process periods will run every 25-30 school days. If possible the LA will offer places every 20 school days but this is dependent on the support of I.T.
- 2.7 An in year calendar of dates will be published on the Council's website to show when each process period is open, closed and when places will be offered and parents notified.
- 2.8 Each process period has an open and close date, and within this period the LA will receive applications. On each closing date any application must be submitted online by **12 noon** of that day for it be considered in that process period.
- 2.9 Some OOA schools require parents to also complete a Supplementary Information Form (SIF) in order to find out what criteria the child would come under e.g. if they are Baptised Catholic.
- 2.10 The SIF is available on the Council's website and on the schools website. However, the SIF must be submitted at the same time as the application (or before the closing date). If these are not submitted it may affect the rank of the application.
- 2.11 Supplementary forms must be submitted directly to the school. Please note that a Supplementary Form alone is not an application for a school place, parents must have also completed an online admissions application. Please note this is only relevant to OAA that are in the in year scheme.
- 2.12 The Admissions Team will send the applications received in each process period to the OOA school, and those not buying into the LA's traded service, for them to rank in order of their oversubscription criteria, and to send back to the LA within the required time limit.
- 2.13 Even if schools have space, they must not admit the child until they have completed an in year application online and the application has been processed by the School Admissions Team. This is to ensure that the correct application is considered for any place available.

3. Processing Applications and Offering Places

- 3.1 When reaching an admissions decision, Admissions Authorities **must** comply with Paragraph 2.7 of the 2014 School Admissions Code which states that the decision must not be made by one individual. For mainstream OAA schools whether they are part of the Scheme or not, the decision must be made by the whole Governing Body or Admissions Committee or all Directors or an admissions committee established to make the decisions.
- 3.2 For schools that are their own OAA and have not bought into the LA's traded service, details of the preference for a mainstream OAA school that is part of the Scheme will be forwarded by the LA to the school concerned so that a decision can be made by the Admissions Authority. The Admissions Authority will then be responsible for determining whether a place can be offered and for notifying the LA of the outcome of the preference within the timeframe specified in the calendar of dates.
- 3.3 OAA schools that have not bought into the LA's traded service, will hold admissions meetings as necessary (see 3.1 above) to ensure that the timescales set within the Scheme can be met. The Department for Education (DfE) advises that decisions of this kind can be taken by a minimum of two appointed representatives (Governors or Directors) and the meeting can be virtual (but must be in accordance with the schools governance policy).
- 3.4 When considering whether a place is available the decision will normally be made on the basis of whether the number on roll in the particular year group is less than the Published Admission Number (PAN) for the particular school and/or the PAN number for the school when that year group started at the school in the year of entry (if different).
- 3.5 If there are places available in the relevant year group and the number of applications is fewer than the number of available places, the Admissions Authority (which may be the LA or the LA acting on behalf of the mainstream OAA school that has asked the LA to act as its agent and process applications on its behalf) **must** comply with Paragraph 2.8 of the 2014 School Admissions Code and offer a place to every child who has applied for one.
- 3.6 If there are places available in the relevant year group but the number of applications exceeds the number of available places, the Admissions Authority (which may be the LA or the LA acting on behalf of a mainstream OAA school) **must** decide to whom the place or places are to be offered by prioritising the applications according to the determined and published over-subscription criteria.
- 3.7 If there are no places available in the relevant year group, the Admissions Authority (which may be the LA or the LA acting on behalf of the mainstream OAA school) **must** prioritise the applications according to the determined and published oversubscription criteria.
- 3.8 Where the LA is the Admitting Authority or is acting on behalf of the OAA, the LA will apply the oversubscription criteria determined and published for that school to determine which children should be offered a place as set out in 3.6 to 3.7 above.

- 3.9 On the offer dates specified in the In Year Calendar, the LA will send all schools an electronic list of all the children offered a place at their schools. On the parent notified dates, the LA will send out the offer of a place via email.
- 3.10 Where the LA processes an in-year application and it is not possible for a place to be offered at any of the preferred schools requested by the parent on the application, and the child is resident in Swindon and is attending a Swindon School or is Home Educated, the LA will not offer an alternative school place.
- 3.11 Where the LA processes an in-year application and it is not possible for a place to be offered at any of the preferred schools requested by the parent on the application, and the child is resident in Swindon and the child has no school place (is out of school), the LA will determine the nearest school within a reasonable distance that has a place available.
- 3.12 The Alternative school will be the next nearest school with a place available at that time.
- 3.13 If the nearest school within a reasonable distance that has a place available (see 3.11) is a mainstream OAA school that is not part of the Scheme, the LA will notify the parent that the nearest school within a reasonable distance that has a place available is a school that is not part of the Scheme and advise the parent to make a direct application for a place at that school.
- 3.14 For all schools that are part of the Scheme, the LA will send formal written notification of the offer and/or refusal. Individual schools **must not** contact the parent in writing or by any other method until the LA has sent formal written notification.
- 3.15 If the child lives in England but outside Swindon, the LA will notify the current home LA that a place has been offered at a Swindon school (or an application was made for a place at a Swindon school(s) and no place was offered).
- 3.16 An offer of a school place will normally be available for no longer than 28 school days from the date on which the offer is made.
- 3.17 The School Admissions Team will require up to date numbers for children in each year group for all schools on a regular basis to ensure that the correct number of places can be offered. Schools must provide this on the dates specified in the in year calendar.
- 3.18 If a place is refused at a school in any year group, the child will be placed on the waiting list for the school, if they hold one. Parents should refer to each individual schools admissions policy with regards to how they hold waiting lists and for how long children are on waiting lists.
- 3.19 If a child is offered a place at a lower preference, they will remain on the waiting list for any higher preferences.

- 3.20 There will be very exceptional cases that can be considered outside of a process period, for instance Looked After Children (LAC), Children who are subject to Domestic Violence and living at the Women's Refuge / or appropriate alternative, Year 11 protocol children, and Asylum Seekers or Refugees. LAC applications will be processed within 5 school days.
- 3.21 If parents are making applications for more than one child, the LA (or OAA schools) will consider each application separately. If one child is offered a place it does not necessarily mean that the other child will also be offered a place as this depends on the number of places available. The application form does request that that parents specify if they would like to be allocated places at one school for all children even if this means it is a lower preference.
- 3.22 All schools within the Scheme must inform the LA as soon as a child starts or leaves their school by via the Vacancy Spreadsheet sent to the LA.
- 3.23 Children will be expected to remain on roll at the current school (if it is a Swindon school) and attending there, whilst their transfer to another school is in progress, unless they are new to the Country or area.

4. Requirements on state-funded mainstream OAA schools that are not part of the Scheme

- 4.1 If parents are applying for a school place at a school that has opted out of the in year coordinated scheme, the parent must complete a separate application form, available on the Council's website and on the schools website directly. This must be sent to the school directly and not the LA. If the LA does receive any application for OAA schools that are not part of the scheme the LA will pass these on to the school as soon as possible, within 5 school days.
- 4.2 There is a legal requirement for schools to notify the LA of any in-year application submitted to them and its outcome. Mainstream OAA schools that are not part of the Scheme must comply with this legal requirement.
- 4.3 The OAA school should notify the LA of any in- year application on the day it is received by the school if possible, but within 5 school days at the latest. The OAA should send the application to the Admissions Officer for the School at the LA at schooladmissions@swindon.gov.uk
- 4.4 The OAA should also send a copy of the decision letter, once the application has been considered by the Governing body, to the Admissions Officer for the School at the LA at schooladmissions@swindon.gov.uk
- 4.5 Mainstream OAA schools that are not part of the Scheme must send a formal written notification to the parent of the outcome of the application. Where an offer is made, the school must specify a date by when the child should join the school. This start date *should* not be more than 28 school days after the date of the offer. If a place cannot be offered, the school must provide details of its Waiting List.

4.6 If a place cannot be offered, the school must inform the parent of their right to a school admissions appeal and how they can lodge such an appeal. If a place cannot be offered, and the child is resident in Swindon and has no school place (is out of school), the school should provide a copy of the original application and the formal written notification without delay, so that the LA can determine the nearest school within a reasonable distance that has a place available. This should be sent to admissions@swindon.gov.uk

4.7 The LA needs correct information about where places are available. Therefore, all mainstream schools in Swindon **must** regularly update the LA about the number of children on roll in each year group and/or the number of places available in each year group. Schools that are not part of the Scheme **must** provide this information on the dates listed in the In Year Calendar.

4.8 If the LA does not receive the information in 4.4 above, the LA will contact the individual school in the first instance to try to resolve the issue. The LA will also report non-compliance that has not been resolved in its annual report to the Office of the Schools Adjudicator.

4.9 All schools in Swindon **must** inform the LA when a child leaves the school for any circumstances i.e if they have moved to another Swindon School or if they have moved away. The school must also advise the LA when children have started at their school.

5. School Admission Appeals

5.1 For all mainstream schools that are part of the Scheme, the LA will provide parents with details when sending the formal written notification of how to lodge a school admissions appeal where a place could not be offered that was listed as a higher preference on the application than the school offered.

5.2 Appeals for all Community and Voluntary Controlled schools in Swindon are handled by the Appeals Clerk, Democratic Services department of Swindon Borough Council, which is separate to the School Admissions Team. Parents will receive information about the online appeals process available at:

https://www.swindon.gov.uk/info/20071/school_places_and_admissions/973/school_admission_appeals

5.3 Some mainstream OAA schools in Swindon that are part of the Scheme have purchased the school appeals service offered by the Appeals Clerk Services and parents will receive information about the appeals process available if they have been refused a place through the Scheme.

6. Glossary and Definition of Key terms

In this scheme –

- “the LA” means Swindon Borough Council acting in their capacity as a Local (Education) Authority;
- “the LA area” means the Borough of Swindon;
- “Primary school” has the same meaning as in section 5(2) of the Education Act 1996;
- “Secondary school” has the same meaning as in section 5(2) of the Education Act 1996;
- “school” means – a Community, Voluntary Aided, Voluntary Controlled, Trust School, Foundation School, Academy, University Technical College, Studio School or Free School
- “Own admission authority”(OAA) in relation to a Community or Voluntary controlled school means the LA and, in relation to an Academy, Foundation, Voluntary Aided or Free school means the governing body of that school;
- “the specified year” means the school year beginning in September 2020
- “admission arrangements” means the determined arrangements which govern the procedures and decision making for the purposes of admitting pupils to a school.

Applications outside the Normal Age of Admission

Parents of gifted or talented children, or those who have experienced problems or missed part of a year, for example due to ill health, can seek places outside of their normal age group. Admission Authorities must make decisions on the basis of the circumstances of each case, informing parents of their statutory right to appeal. This right does not apply if they are offered a place in another year group of the school.

Evidence may be required in these circumstances from a Senior Medical Consultant, Educational Psychologist and/or other relevant professionals.

In the instance that the child has not started school (or is not statutory school age), or it is before the child needs to apply for a school place, the Admitting Authority for the school (LA for maintained schools or Governing Body of the School) may have discretion to decide whether the child would need to be put back an academic year on the circumstances outlined above. Evidence may be required in these circumstances from a Senior Medical Consultant and/or Educational Psychologist. This discretion would only be used in exceptional circumstances where it would have to be proved that it was in the child’s interest. This may have already been considered by the Special Educational Needs Assessment Team (SENAT) through the Early Years Panel.

Relevant Age Group

The age group to which children are normally admitted. Each relevant age group must have admission arrangements, including an admission number. Some schools (for example schools with sixth forms which admit children into the sixth form) may have more than one relevant age group.

Statement of Special Educational Needs (SEN)

A Statement of Special Educational Need is a statement made by the local authority under Section 324 of the Education Act 1996, specifying the special educational provision required for that child.

Education, Health and Care Plan

An Education, Health and Care plan is a plan made by the local authority under Section 37 of the Children and Families Act 2014 specifying the special education provision required for that child.

Proof of Address

The LA reserves the right to ask parents for proof of their address. If the parents' current address is different to that held on the LA's computerised system the LA may ask parents to provide proof of the new address if one is indicated. Acceptable proof of address includes:

- A copy of your Council Tax Bill
- A solicitor's letter stating contracts have been exchanged and specifying a completion date
- A copy of the Child Tax Credit or Working Tax Credit award letter
- A signed and dated tenancy agreement plus proof of residency (e.g. copy of recent utility bill)

If parents fail to provide proof of a new address then, the LA will use the old address for admission purposes. If parents indicate they will be moving house, even if they provide the relevant proof of that address, they must move into that property by at least the end of the first term. The LA reserves the right to check that parents are living in the address indicated within that timescale. If parents are not living in that address, the applications will be investigated and the place allocated may be withdrawn

Applications

In-year admission application

For in-year applications, all parents applying for Admission applying to transfer during the 2021-22 must complete the online Swindon In-year application form. Paper forms are also available for those unable to apply online.

Supplementary Information Forms

An additional supplementary information form (SIF) may be required by an Academy, Foundation or Voluntary Aided school who require additional information in order to consider the application, this is available from the school. This may be for in-year and normal admissions round.

Children from Overseas

Children who hold a full British Citizen passport or children whose passport has been endorsed to show they have a right of abode in the country are entitled to apply for a place at a maintained school. The passport or visa should be made available for inspection before an offer of a school place can be made. Asylum Seekers should make available evidence of their right of abode as provided by the National Asylum Support Service.

For in-year applications, with the exception of UK service personnel as indicated above, applications for in-year places will only be accepted once the child is permanently resident within the country.

Duplicate Applications

The LA requires parents to submit one application only per child. Where the LA receive more than one application for the same child before the closing date, the LA will only consider the latest submitted application and the other application will be discarded.

Preferences

Parents will be invited to state up to three ranked preferences. Each preference will be considered equally. This means that Swindon LA will consider all applications against the published admissions criteria without reference to how the school applied for has been ranked on the application form. As far as possible applicants will be offered a place at a school to which they have expressed a preference. Where the applicant has made more than one preference the LA will make an offer at the highest ranked preference school with available places in accordance with the standard admission criteria. Where it is not possible to offer a place at a preferred school, and the applicant lives in Swindon, the LA will allocate a place at the next nearest school with a place.

The next nearest school with a place will relate to any maintained mainstream school, whether it be Community, Voluntary Aided, Voluntary Controlled, Foundation, Academy or Free School (excluding Catholic Schools and schools that are not part of this scheme, unless agreed with the school's governing body).

7. Schools that are not part of this Scheme for 2021-22:

To be inserted once the LA has been informed

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Mainstream Home to School Transport Policy 2021-22

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1. Introduction

- 1.1 This document sets out the Local Authority's duties and responsibilities on school transport.
- 1.2 The aim of this document is to set out policies and approaches that provide the very best service to our customers by producing information in one document that is widely available to all parties with an interest in school transport.
- 1.3 It therefore clarifies the Local Authority's responsibilities for the delivery of mainstream, Special Educational Needs and post-16 transport and includes additional policies on transport for students, school transport operations in extreme weather conditions, behaviour and drugs and alcohol policy on school transport.
- 1.4 The policy is reviewed on a regular basis in consultation with other Council directorates and stakeholders, including schools, transport providers, neighbouring Local Authorities and Diocesan Authorities.
- 1.5 This policy only applies to those students living within the borough boundary of Swindon.
- 1.6 This document has been reviewed in line with the Home to School travel and transport guidance published by the Department for Education (DfE) in July 2014 and the Post – 16 transport and travel support to education and training (DfE) January 2019.
- 1.7 For the purposes of this document, the Local Authority (LA) is defined as the department within Swindon Borough Council that administers Education.
- 1.8 For further information and advice on this document, please contact:

Strategic School Admissions
Manager

School Admissions
Swindon Borough Council
Wat Tyler House
Beckhampton Street
Swindon
Wiltshire
SN1 2JH

Telephone – 01793 445500
Email –
schooladmissions@swindon.gov.uk

2. Legislation

- 2.1 The Education and Inspections Act 2006 inserted sections 508B and 508C into the Education Act 1996 (The Act). These sections place a duty on Local Authorities to ensure that suitable travel arrangements are made where necessary to facilitate the student's attendance at school. Please note that 508B refers to travel arrangements for 'eligible children' of compulsory school age. This is a mandatory requirement. 508C refers to travel arrangements for children other than 'eligible' children. This is a discretionary requirement
- 2.2 The duty applies for home to school travel arrangements made at the start of the day and school to home travel arrangements at the end of the day for students of compulsory school age. It does not relate to travel between educational institutions during the school day.
- 2.3 Parents are responsible for ensuring that their children attends school regularly. However section 444 of the Act outlines the situation where a parent may have a defence in law against prosecution by a Local Authority for their child's non-attendance at school. Section 444(3)(b) provides a defence if he or she provides that:
- a. The qualifying school at which the student is a registered student is not within statutory walking distance.
 - b. No suitable arrangements have been made by the Local Authority for boarding accommodation at or near to the school
 - c. No suitable arrangements have been made by the Local Authority for enabling the student to become a registered student at a qualifying school near to his/her home
 - d. The Local Authorities has a duty to make travel arrangements in relation to the student under section 508B and has failed to discharge that duty.
- 2.4 The definition of eligible students is set out in (Schedule 35B) of the Act in respect of whom travel arrangements will be required.
- 2.5 Section 508B prescribes that travel arrangements must be provided free of charge. In cases where students do not qualify for free transport, section 508C provides a discretionary power for authorities to provide assistance by paying all or part of the student's reasonable travel expenses. Each authority decides whether and how to exercise these powers.
- 2.6 The Special Educational Needs and Disability Regulations 2014 section 53) indicate that the following must be published in the local offer in relation to transport assistance. Schedule 2(14) Transport arrangements for children and young people with special educational needs or a disability to get to and from school or post-16 institution, or other institution in which they are receiving

special educational provision or training provision including—

- (a) arrangements for specialist transport;
- (b) arrangements for free or subsidised transport;
- (c) support available in relation to the cost of transport, whether from the local authority or otherwise.

3. Mainstream School Transport Policies

Eligibility

- 3.1 Students will be entitled to free travel assistance from a suitable pick up point near to their home to a suitable set down point near the school they attend if:
- a. They attend the designated appropriate school
- and either**
- b. They are aged between five and seven years old and live more than 2 miles (3.218688 kilometres) from the school they attend;
- or**
- c. They are aged between eight and sixteen years old and live more than 3 miles (4.828032 kilometres) from the school they attend;
- 3.2 Distances will be measured by the safest walking route as defined by Swindon Borough Council using mapping software.
- 3.3 To qualify for transport assistance the student must be attending the designated appropriate school **AND** qualify under the distance criteria.

The designated appropriate school

- 3.4 The designated appropriate school for the purposes of assessing eligibility is the school within the **designated transport area** for the home address in **Appendix 1**.
- 3.5 When such a school is unavailable (i.e. there is no space in the relevant year group), the designated appropriate school will be considered to be the next nearest school with a place available. The next nearest school is measured as a straight line between the Local Land and Property Gazetteer (LLPG) address point of the applicant's home address and of the school with those living closest to school receiving higher priority.

Home address

- 3.6 Transport to and from school will be determined and approved from a single permanent residence. This is the one where the student spends most time with the parent/guardian and has been used for admission purposes and the school.
- 3.7 Transport provision will normally cease if there is a change in the home address that would lead to attendance not being at the designated appropriate school for the new address.

- 3.8 In exceptional circumstances, where there is a change in the student's home address, or placement if in public care, the Local Authority may consider the continued attendance at the current school to be the student's best interest. Consideration will be given to whether the change of address was entirely outside any parental control.
- 3.9 Recognised exceptions to the rules given above are as follows
- 3.9.1 In some cases of temporary disability of the student on the advice of the Local Health Authority. Evidence of this would be required.
- 3.9.2 For some students resident in Swindon in Year 10-13 whose families move out of the designated area for the Swindon school they are attending and live more than three miles by a safe walking route and receive Income Support or income-based Job Seeker's Allowance, to help them complete a GCSE or A-level Course.
- 3.9.3 Where a student studies somewhere other than the designated appropriate area school, sixth form or college to follow a course that is not provided, in broadly similar terms by the designated area colleges and the student's family receive Income Support or income-based Job Seeker's Allowance.

Road Safety

- 3.10 Transport is assessed for a safe walking route using "Assessment of Walked Routes to School Guidelines" published by Road Safety GB which identifies hazards and the assessment of risk of walked routes to school.

The assessment of a safe walking route

- 3.11 As it is the duty of parents to ensure that students attend school, the law on safe walking routes assumes that a responsible adult will accompany students to and from school.
- 3.12 A safe route will be on footpaths along the majority of its length. Short sections of road with a speed limit of 30mph or less may be acceptable, subject to assessment.
- 3.13 Crossings of major routes, including all routes with a speed limit of more than 30mph, will either be by controlled crossing or by under- or over-pass. This can legitimately involve a diversion or even doubling back on a route, but any additional distance will be included in the route measurement.
- 3.14 In determining entitlement to free transport, the route used in assessing the distance is the shortest safest available walking route in accordance with National Road Safety Guidance.

Primary School Aged Students

- 3.15 Transport can be provided, on road safety grounds if the journey to the designated appropriate school would involve the use of roads without footpaths or lighting.

Secondary School Aged Students

- 3.16 There are a number of criteria that need to be met for Secondary School students to receive transport on road safety grounds. The following criteria are based on the expectation that parents will accompany their children to and from school where they consider it necessary:

- a. There is no footway, or;
- b. Students have to walk along a dual carriageway with a speed limit of 40 mph or higher, and they have to cross a dual carriageway, and there is no safe crossing point available. A safe crossing point is defined as any of the following:

Light Operated Crossings
Zebra Crossing
Pedestrian Refuge
Foot Bridge
Underpass
School Crossing Patrol in Operation

Students (without an EHCP) unable to walk to school by reason of their disability, or mobility problem (including temporary medical conditions).

- 3.17 Where a student is attending their nearest qualifying school (or designated school if this is not the nearest) which is within the relevant walking distance (i.e. within 2 miles if aged under 8, and 3 miles if aged over 8), but is unable to walk to that establishment (accompanied as necessary) by reason of their SEN and/or disability, he or she will be eligible for transport assistance by providing appropriate evidence from their consultant, for example:

- Long term severely restricted independent mobility (something that is likely to last at least a year, this can include sporadic conditions such as epilepsy or multiple sclerosis).
- a physical disability e.g. severe cerebral palsy which may necessitate the daily use of significant mobility aids such as a wheelchair,
- a medical condition resulting in severe persistent pain and/or extreme fatigue, an example of this might be juvenile arthritis,
- a medical condition resulting in serious persistent health and safety risks. Examples of this might be intractable epileptic seizure disorders

- 3.18 Transport may be provided to the designated appropriate school on medical grounds for either short-term provision, where a student has a temporary medical problem or on a long-term basis if the student has a particular long-term condition. In both cases recommendations must be received from the Local Health Authority.
- 3.19 Evidence would be required and any application would be considered on a case by case basis. In all cases recommendations must be received from an appropriate medical officer from the Local Health Authority, this should be a Consultant looking after the student.
- 3.20 If assistance is granted this would be reviewed termly, with the need for new evidence to be submitted. If assistance is granted the LA, in the first instance would seek to provide petrol expenses. If a parent cannot provide evidence from the Local Health Authority, the LA will remove that assistance.

The Nature of Transport Arrangements

- 3.21 The arrangements for assisted travel which may be made under this policy will be at the LA's discretion and area made on the most cost-effective basis. These arrangements may take the form of:
 - a. Travel pass for use on public transport (season ticket);
 - b. A parent consenting to use their car in return for a mileage allowance;
 - c. Travel pass or other authorisation for use on private contract services;

Parental preference

- 3.22 The Local Authority has no duty to provide transport where parents exercise their right to express a preference for their child to
 - a. Attend a particular school other than the school which the LA has designated as serving the area where they live, or
 - b. Attend a particular school other than the designated appropriate school.

Education and Inspections Act 2006

- 3.23 The Education and Inspections Act 2006 provides extended right for students from low income groups.
- 3.24 Low income groups are defined as where the student is entitled to free school meals or where the parents receive the maximum Working Tax Credit are entitled as follows
 - a. Students aged between eight and eleven years old – where the nearest suitable school is beyond two miles
 - b. Students aged between eleven and sixteen

- i. To one of the three closest schools to the home address between 2 and 6 miles, or
 - ii. To a school between 2 and 15 miles where preferred on the grounds of religion or belief
- 3.25 The LA may review all eligibility for transport on a yearly basis. If the student is no longer eligible for transport assistance on these grounds then the transport will be withdrawn and the parent / carer will be informed.
- 3.26 There is a right of appeal for parents or students to the Education Transport Appeals Sub-Committee for transport on road safety grounds, in relation to the issue of their ability to accompany their children to school. (The need for parents to be at work would not usually be considered as a reason why transport should be provided). Details of the Appeals process are set out later in the document.

Timetable and process for applications

- 3.27 Applications are to be made online, via the LA website
https://www.swindon.gov.uk/info/20032/schools_and_education/414/school_travel_support/2
- 3.28 Whilst applications can be made at any time, applications for travel support to commence at the start of a new academic year should be made by 1st July.
- 3.29 The LA will accept application forms after this time, however the LA cannot guarantee travel support will be available for the start of the academic year

4. Mainstream School Transport – Discretionary

The Key policies involving discretionary transport are:

Students of pre-statutory school age

- 4.1 Transport may be provided for students of pre-statutory school age where transport is already running and where there are spaces available on current transport.

Education other than at School (EOTAS) and elective home education

- 4.2 Where parents, in conjunction with the school if appropriate, have chosen to educate their child other than at school, no assistance will be available from the LA in connection with any transport need arising.

Education other than at School (EOTAS) and referral units

- 4.3 Where the LA arranges for a student to have education other than at school, the LA will provide transport subject to normal eligibility rules on home to school transport.

Students without an Education, Health and Care Plans (EHCP)

- 4.4 All transport for students without EHCPs who are attending mainstream schools will be provided on the basis of normal eligibility criteria.
- 4.5 If a Local Authority places a student with an EHCP at a school or unit this will be deemed as the **designated appropriate school** for school transport purposes irrespective of the Local Authority's normal zoning arrangements, and these applications will be considered under the SEND Transport Policy.

Children in the care of the Local Authority

- 4.6 The school at which a student is placed by the LA will be deemed the **designated appropriate school** for school transport purposes irrespective of the LA's normal zoning arrangements in order to provide continuity of educational provision for such students. The allocation of a school place will be reviewed as part of the student's regular Care Plan review.

Continuity

- 4.7 Where students resident within the Borough move home during Years 10 and 11 out of the designated area for the current Swindon school in which they are studying, the LA may provide free home to school transport.
- 4.8 This is applicable when the current Swindon school is more than 3 miles from home and the parents are in receipt of the relevant qualifying benefits, (Universal Credit). This is to assist the student to complete their GCSE courses.
- 4.9 Any entitlement under continuity grounds must fulfil all the criteria in the paragraph above.

- 4.10 Any child whose entry to school has been delayed and may reach school leaving sooner than their peers (in Year 10), will continue to be eligible for school transport assistance if they are already in receipt of it for continuity purposes.

School Transport Appeals

- 4.11 Parents have a right of appeal to the Education Transport Appeals Subcommittee of Swindon Borough Council set out in part 7 of this policy

Provision of Passenger Assistants

- 4.12 A Passenger Assistant will only be provided following the outcome of an assessment of the student's Special Educational Needs and / or medical needs in order to meet the needs of the students travelling to and from school. This determination will be made by the Special Educational Needs and Disability Assessment Team, and any other appropriate professionals, in liaison with the Passenger Transport Team taking into account:
- 4.12.1 A student's medical needs, particularly where rescue medication is required. Passenger Transport Assistants employed by the LA are trained in Emergency Aid, but it is not part of their role to administer medication. If a student has medical needs that are likely to require intervention whilst travelling, consideration will be given to the provision of a specialist health carer from the NHS.
- 4.12.2 Where an individual student's needs create a clear danger or health and safety risk to themselves and other passengers on the vehicle
- 4.12.3 Where an assessment of the students on the vehicle and the journey to be undertaken highlight a clear danger or health and safety risk to all passengers on the vehicle.

5. Post 16 (16-18)Mainstream Education transport policy

- 6.1 There is no legal requirement for Local Authorities to provide transport beyond the completion of Year 11
- 6.2 This policy aims to ensure access to further education opportunities to all 16-19 year olds living in the Borough of Swindon, as required under the Education Act 2002.
- 6.3 Given the urban nature of the Borough, Swindon offers good transport accessibility within its boundaries, with extensive public transport provision. This presents very few barriers to learning for the majority of mainstream students.

Policy

There is no automatic discretionary subsidised support for pupils accessing mainstream Post 16 education although the transport on the school bus will be provided to the Ridgeway School 6th form from within the Ridgeway Transport Area if over 3 miles or due to an unsafe walking route. This will require an annual parental contribution of £495.

6. Other Key Policy Areas

Other relevant, key policies are set out below:

- 7.1 The home address given on the application form must be the address where the student resides for most of the week with their parent or carer. Where a student has a joint address or the parents have dual responsibility, then the address that the child benefit is paid will be taken as the students's home address. The LA may ask parents or carers to provide proof of these circumstances. Please note that transport, if provided, will only be provided to one address.
- 7.2 If you move house please let us know in advance as this may affect your child's entitlement to transport or they may need to be on a different bus. If you have any queries about the area you are moving into please contact us and we will be able to tell you the catchment areas for the school your child attends.
- 7.3 Students may be required to walk up to one mile from home to the pick-up point and, where students use public service routes, they may be required to walk up to one mile from the setting-down point to the school or 1.5 miles to a 16-18 provider.
- 7.4 Requests for changes in transport arrangements will be considered but changes, such as additional stops, are not always possible for reasons of safety and timing.
- 7.5 Students aged eight years of age who are entitled to free transport under the distance criteria will continue to receive free transport until the end of the academic term in which they reach the age of eight.
- 7.6 Where, for any reason, transport facilities have been approved in error, the LA reserves the right to withdraw that provision at any time convenient to the LA, and will normally do so, after giving due notice of its intention to do so.
- 7.7 Transport is only provided if the student attends the nearest education establishment offering the qualification irrespective of the module content.
- 7.8 Students who do not have an Education Health and Care Plan but who are deemed to have a level of special needs below that required for a formal statement, would not normally be entitled to free transport but would have the right to appeal for transport to the Education Transport Appeals Panel.

School Transport operations in extreme weather conditions

- 7.9 When there is snow, ice or flooding, school transport may be disrupted. If the bad weather occurs overnight, parents must contact the transport operator or listen to local radio / website / school to find out if the transport is running. If parents/carers cannot find out for certain and school transport is over 20 minutes late then it should be assumed that

the school bus is not operating at all. If a parent decides to take their child into school themselves, they must also be able to collect their child in the afternoon because school transport may still not be able to operate.

- 7.10 Where very bad weather is forecast or prolonged, the LA will make a decision after 2 p.m. the previous day as to whether to provide transport. In these instances information will be available on the local radio station and Council website.

Behaviour on School Transport:

- 7.11 The majority of students travelling to and from school behave well. For a few, this is not so and these few can make the journey very unpleasant for others. Unacceptable behaviour will not be tolerated and in all instances of unacceptable behaviour the school and parents of those concerned will be contacted. Bullying, vandalism or unruly behaviour can result in exclusion from transport.

7. School Transport Appeals

- 8.1 In accordance with the revised guidance for transport appeals, since September 2016, the LA has adopted a 2 stage review and appeal process.
- 8.2 This appeals policy is applicable to children who live within the Borough of Swindon that are attending mainstream and special schools. This appeals policy applies to children with or without an Education, Health and Care Plan (EHCP).

Right to Appeal

- 8.3 Where a parent has been refused transport assistance they can challenge the decision for the following reasons
- 8.3.1 The nature of the transport arrangements offered
 - 8.3.2 Their child's eligibility
 - 8.3.3 The distance measured in relation to statutory walking distances; and
The safety of the route

Stage 1

- 8.4 Within 20 working days from the receipt of the local authority's home to school transport decision, a parent can make a request asking for a review of the decision.
- 8.5 A parent will be advised of the right for a review within the decision letter.
- 8.6 The request for review should be made by completing the transport appeal form online. A link will be provided by email. The parent should state the reason why the decision should be reviewed and given details of any personal and/or family circumstances the parent believes should be considered when the decision is reviewed.
- 8.7 Within 20 working days of the receipt of the parent's written request a senior officer will review the original decision and will notify the parent by way of detailed written notification of the outcome of the review.
- 8.8 The decision letter will contain the following
- 8.8.1 The nature of the decision reached;
 - 8.8.2 How the review was conducted (including any standards followed e.g., Road Safety GB)
 - 8.8.3 Information regarding other parties consulted
 - 8.8.4 What factors were considered
 - 8.8.5 Information how the parent can escalate their case to stage 2 if appropriate

Stage 2

- 8.9 Following the receipt of the local authority's stage one decision notification, a parent can within 20 working days submit a request to escalate the matter to Stage 2.
- 8.10 A parent should complete a transport appeal form online. A link will be provided by email.
- 8.11 Within 40 days of receipt an appeal will be scheduled with the Education (Transport) Appeals Sub-Committee who will consider both written and verbal representation from both parents and officers involved in the case.
- 8.12 The parent will be notified of the outcome by telephone following the outcome of the appeal panel and will receive formal notification of the outcome within 5 working days. The notification will include
- 8.12.1 The nature of the decision reached;
 - 8.12.2 How the review was conducted (including any standards followed e.g., Road Safety GB)
 - 8.12.3 Information regarding other parties consulted
 - 8.12.4 What factors were considered
 - 8.12.5 If refused, information about how the parent can refer to the case to the Local Government Ombudsman
- 8.13 Where an appeal is upheld, this does not guarantee funding throughout the school life of the child, and the circumstances under which the appeal was upheld would be kept under review.

Education Transport Appeals Sub-Committee

- 8.14 An Education Transport Appeals Sub-Committee will meet to consider transport appeals. The membership of this Sub-Committee is made up of three Councillors selected from a pool appointed by the Appeals Committee. These Councillors will not have been involved with the case previously and should not have any close connection with the appellant. If one of the Councillors does have a remote connection with the appellant, they may be allowed to take part in the hearing if neither the LA's representative nor the appellant objects
- 8.15 The Education Transport Appeals Sub-Committee will consider case papers for each appeal consisting of the reasons as to why the LA have refused to provide transport assistance, any other relevant information and the parents appeal giving reasons as to why they are appealing against this decision.
- 8.16 Each Councillor will remain a Committee member for at least one year but there will be no limit on how long they wish to continue as a member providing there is no conflict of interest in the areas mentioned above.
- 8.17 All Councillors on the Appeals Committee will undertake training on the Transport Policy at least once per academic year to ensure that Councillors become 'expert' in this field.

- 8.18 The Education Transport Appeals Sub-Committee will consider all appeals on their individual merits. The decision of the Sub-Committee is final with no further rights of appeal.
- 8.19 The Education Transport Appeals Sub-Committee must operate within the Transport Policy at all times.
- 8.20 The Education Transport Appeals Sub-Committee must take into consideration the cost of transport should the appeal be upheld.
- 8.21 If the Education Transport Appeals Sub-Committee agrees to uphold an appeal, it must indicate the length of time for which the transport has been agreed.
- 8.22 Once the appeal has been heard the Education Transport Appeals Sub-Committee will make its decision that day and the Committee Officer will endeavour to contact the parent by telephone the same day to give the result of the appeal. A decision letter outlining the Education Transport Appeals Sub-Committee decision and its reasons will follow usually within one week.
- 8.23 If parents are not happy with the decision of the Education Transport Appeals Sub-Committee then they are able to contact the Ombudsman. The Ombudsman will only be able to look at the way the appeal was conducted and establish whether the LA followed all its processes in the correct manner.
- 8.24 If the Appeal is in relation to a placement made by order of an SEN & Disability Tribunal, the Appellant and the Local Authority may be bound by any decision relating to travel that the Tribunal has made. The SEN and Disability Tribunal may have specifically come to a decision about placement based on the inclusion of travel costs.
- 8.25 For appeals on the grounds of road safety, parents can only appeal if they believe that they are unable to accompany their child to school. However, the Appeals Sub-Committee will not usually accept the need for parents to be at work as the reason why transport should be provided.
- 8.26 The Education Transport Sub-Committee is able to consider applications for assistance from parents of children receiving nursery education as per the School Standards and Framework Act 1998.

Grounds Under Which the Education Transport Appeals Sub-Committee can Uphold an Appeal

- 8.27 The grounds under which the Education Transport Appeals Sub-Committee can allow / uphold an appeal are:
- 8.27.1 The Transport Policy has not been applied properly.
- 8.27.2 There are discrepancies in the way the application has been handled.

8.27.3 The individual circumstances put forward by the applicant outweigh the normal policy considerations and are considered to be exceptional circumstances.

8.28 Examples of exceptional circumstances are:

8.28.1 If there are exceptional circumstances within the immediate family unit where the child lives that affects the child ability to attend their designated school such as domestic violence. Evidence would be required to support this.

8.28.2 Death or serious illness of parent with whom the child has been living.

8.28.3 In cases of students with Special Educational Needs – additional evidence of need that the Education Transport Appeals Sub-Committee is asked to consider.

8. Contacts

Please contact Education Transport at:
educationtransport@swindon.gov.uk

Or for travel advice for students with an EHCP, please contact the SEND Travel Advisor at:
senttravel@swindon.gov.uk

Please also refer to the local offer <http://children.mycaremysupport.co.uk/>

Appendix 1 – Designated transport areas

The maps outlining the designated transport areas are found in a separate document to be read in association with this document (this can be made available on request to educationtransport@swindon.gov.uk)

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Swindon Borough Council

Pay Policy Statement: April 2020

This statement sets out the Council's policies in relation to the pay of its workforce (excluding schools), particularly its Chief Officers, in line with Section 38 of the Localism Act 2011. The statement is approved by Full Council each year and published on the Council's website demonstrating an open and transparent approach to pay policy.

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Introduction

This statement draws together the Council's policies relating to the payment of the workforce particularly

- Chief Officers;
- Its lowest paid employees; and
- The relationship between the pay of Chief Officers and the pay of other employees.

This statement sets out the Council's key policy principles in relation to pay evidencing a transparent and open process. It does not supersede the responsibilities and duties placed on the Council in its role as an employer and under employment law. These responsibilities and duties have been considered when formulating the statement.

This statement aims to ensure the Council's approach to pay attracts and retains a high performing workforce whilst ensuring value for money. The Council's aims are to ensure that remuneration policies are fair to staff, across all posts, and that they comply with all legal obligations, such as the Equality Act 2010. It sits alongside the information on pay that the Council already publishes as part of its responsibilities under the Code of Practice for Local Authorities on Data Transparency. Further details on this information can be found on the Council's website under [Senior Council Officers](#).

Transparency and Autonomy

The Council recognises and welcomes the aim behind this pay policy statement to ensure that its approach to pay is accessible for all and to enable local people to take an informed view of whether local decisions on all aspects of remuneration are fair and make the best use of public funds.

It also welcomes the Government's recognition that each local authority remains an individual employer in its own right and, as such, has the autonomy to make decisions on pay that are appropriate to local circumstances and deliver value for money for local taxpayers.

The Council is under statutory duty to appoint on merit and has to ensure that it complies with all appropriate employment and equalities legislation e.g. The Equalities Act. The Council will always seek to appoint the best available candidate to a post who has the skills, knowledge, experience, abilities and qualities needed for the post. The Council will therefore consider all applications to try to ensure the best available candidate is appointed.

If a candidate is a former employee in receipt of a Local Government Pension Scheme pension or a redundancy payment this will not rule them out from being re-employed by the Council. Clearly where a former employee left the Council on redundancy terms then the old post has been deleted and the individual cannot return to the post as it will not exist.

The Council will apply the provisions of the Redundancy Payments Modification Order regarding the recovery of redundancy payment if this is relevant. Pensions Regulations also have provisions to reduce pension payment in certain circumstances to those who return to work within the local government service.

Amendments to the Pay Policy Statement

This pay policy statement relates to the financial year 2020/21. Information on the Council's workforce will be published after 1st April 2020 for the financial year.

The statement will be updated annually but may be amended during the year, with agreement by Full Council, if the need arises.

Publication of and Access to Information

The Council will publish this pay policy statement on its website at http://www.swindon.gov.uk/info/20028/open_data_and_transparency/401/senior_council_officers as soon as is reasonably practicable after it has been approved by Full Council. Any subsequent amendments to this pay policy statement made during the financial year to which it relates will also be similarly published.

For further information about this pay policy statement please contact the Council's Director of Human Resources & Organisational Development at sgrewal@swindon.gov.uk.

Structure Overview

As of 1st October 2019 the Council employs **2,582** employees (excluding schools) and provides a wide range of functions.

TUPE

The following TUPE (Transfer of Undertakings (Protection of Employment) Regulations) have taken place since 1st April 2019:

- **1st April 2019:** 4 employees from Town Gardens and Queens Park transferred to Central Swindon South Parish Council.
- **31st May 2019:** 2 employees from First City Nursing transferred to Swindon Borough Council.

All staff who transferred to the Council were integrated into various areas of the Council according to their roles and responsibilities.

Service areas

The Council's service areas are gathered together in the following groupings:

Chief Executive

The Council appointed a new Chief Executive on 12th July 2018. The Chief Executive's key responsibilities are to:

- Be the lead policy advisor to the Council and to support Councillors to make decisions on behalf of the community, and to develop plans for the future of Swindon
- Take responsibility for the performance of 2582 staff (as at 1 October 2019 – this figure does not include school staff or casual workers), ensuring they deliver services in line with Council priorities and statutory requirements
- Develop partnership working with other public, private and voluntary organisations to achieve improved outcomes and better public services for local people
- Ensure the proper use of council resources to deliver value for money for the community across a wide range of services from child adoption to looking after older people
- Raise the profile of Swindon at a regional and national level so that Swindon is able to influence national thinking and to secure additional funding for Swindon priorities
- Work with Councillors to ensure the ethical standards, probity and integrity of decision making in the Council are of the highest order.

Resources & Growth report directly to the Chief Executive. Further information about the [Chief Executive](#) can be found on the Council's website.

Communities & Housing

Communities & Housing is accountable for joined-up delivery across all service areas, partners and providers leading to effective delivery of statutory, support and commercial services to agreed outcomes.

The service areas that support Communities & Housing include StreetSmart, Planning, Regulatory Services & Heritage, Housing, Highways and Architecture and Construction Management.

Resources & Growth

Resources & Growth are the enabling function of the Council with overall responsibility for the Council's support services functions and is managed by the Chief Executive.

The service areas within Resources & Growth are Finance, Audit & Property Assets, Human Resources & Organisational Development, Performance, Organisational Improvement & Communications, Digital Services & Corporate Programmes, Town Centre Development and Strategic Growth & Place.

Adult Social Services

One of Swindon Borough Council's four strategic priorities is to help people to help themselves while protecting our most vulnerable children and adults. Adult Services are responsible for implementing the wide programme of services, commissioning and quality assurance which sit underneath this priority whilst meeting statutory obligations. Public Health supports Adult Services.

The Corporate Director of Adult Social Services holds the statutory obligation for the Director for Adult Social Services (DASS).

Children's Services

One of Council's four strategic priorities is to help people to help themselves while protecting our most vulnerable children and adults. Children's Services are responsible for implementing the wide programme of services, commissioning and quality assurance which sit underneath this priority whilst meeting statutory obligations.

The service areas that support Children's Services include Education, Children's Social Care and Skills, Employment & Lifelong Learning.

The Director of Children's Services holds the statutory obligation for the Director of Children's Services (DCS).

The Council's [organisation chart](#) can be found on the Council's website.

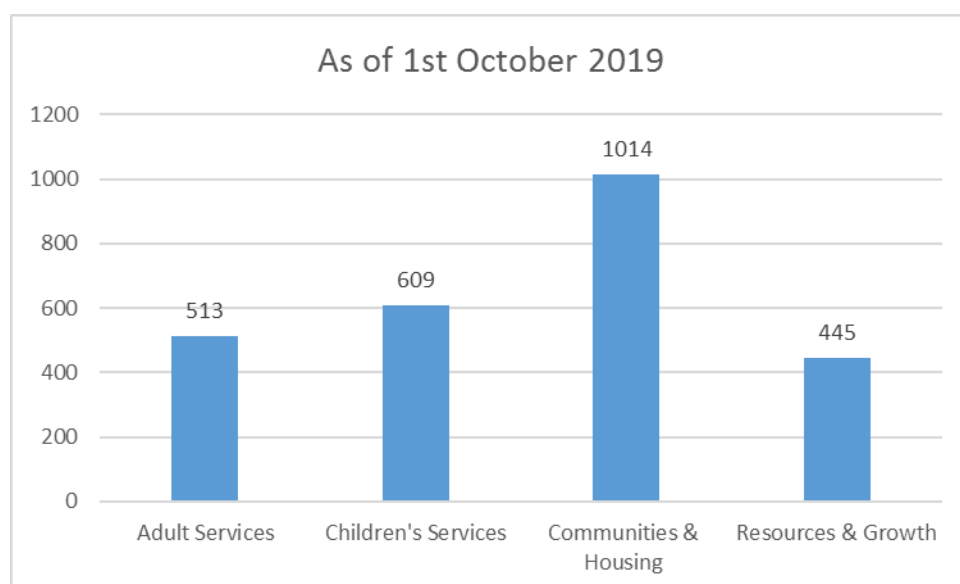


Figure 1: Number of staff in each directorate (excluding the Chief Executive)

As a team member of Corporate Management Team, the Corporate Directors have a shared responsibility for delivering the organisational strategic direction, agreeing priorities and driving their successful achievement.

Senior Officers

This section provides information on the Council's Senior Officers.

- Definition
- New Appointments and Pay
- Terms and Conditions

Definition

Senior Officers have been defined as the posts of:

- Chief Executive – Head of Paid Service
- Statutory and non-statutory Chief Officers (a person for whom the Head of Paid Service has direct responsibility), i.e.:
 - Corporate Director – Communities & Housing
 - Director of Finance (section 151 Officer)
 - Corporate Director - Children's Services (DCS)
 - Corporate Director - Adult Social Services (DASS)
- All Deputy Chief Officers (a person who reports directly to or is directly accountable to one or more of the statutory or non-statutory Chief Officers), i.e.:
 - All Tier 2 posts at Head of Service Level

Identified Senior Officer roles and salaries can be found on the Council's website under [Open Data and Transparency](#).

New Appointments and Pay

In relation to Senior Officers, legislation requires the Full Council or a meeting of Members to be offered the opportunity to vote before large salary packages are offered in respect of a new appointment.

For this purpose, salary packages should include salary, any bonuses, fees or allowances routinely payable to the appointee to which the officer is entitled as a result of their employment.

The Secretary of State considers that £100,000 is the right level for that threshold to be set.

In Swindon, this approach will be applied for all roles graded at Director 5 and above.

There are 5 levels in Swindon's Executive pay structure as detailed below (as of 1st April 2019):

Level	Salary Range	
	From	To
CEO	£156,437	£194,963
Board Director	£122,263	£146,461
Director 5	£102,950	£120,883
Director 4	£84,980	£101,758
Director 3	£70,258	£84,113

This applies to the Chief Executive and all Board Directors for new appointments made after 1st April 2012.

The Council's Special Committee has delegated powers to make decisions on behalf of the Full Council, on the advice of the Chief Executive, on any policy or particular matters that are urgent and considered necessary in the best interests of the Council.

Process for Setting Pay

As agreed by Full Council in June 2005 and updated by the Special Committee in November 2013, pay for Senior Officers is set in line with the Executive Pay Strategy. A copy of the Executive Pay Strategy can be requested through hradviceandadmin@swindon.gov.uk.

In addition, any new appointments at Level Director 5 and above, from 1st April 2012, will have their salaries agreed by Members.

Pay Relationships

This section provides information on the following:

- [Gender Ratio](#)
- [Salary band by Ethnic group](#)
- [Lowest Paid Employees](#)
- [Highest to Lowest Paid Employees](#)
- [Pay Increases and Pay Progression](#)
- [Terms and Conditions](#)
- [Job Evaluation](#)

Gender Ratio (as of 1st October 2019)

The table below reflects the Council's male / female ratio per salary band. Please note that this does not reflect our grading structure as we have staff who are not yet harmonised on our grading structure. This also includes employees on apprenticeships.

Salary (FTE)	Male	Female	Total	Total % of workforce
£0 - £15,000	14	4	18	0.70%
£15,001 - £20,000	264	562	826	31.64%
£20,001 - £25,000	188	306	494	19.17%
£25,001 - £30,000	160	238	398	15.41%
£30,001 - £40,000	150	327	477	18.47%
£40,001 - £50,000	86	167	253	9.80%
£50,001 - £60,000	24	39	63	2.44%
£60,001 - £70,000	11	12	23	0.89%
£70,001 - £80,000	6	11	17	1.01%
£80,001 - £90,000	2	1	3	0.08%
£90,001 - £100,000	0	1	1	0.04%
£100,001 - £120,000	2	3	5	0.19%
Over £120,000	2	2	4	0.15%
Total	909	1673	2582	100%

Salary Band by Ethnic Group (as of 1st October 2019)

The table below reflects the Council's ethnic ratio per salary band. Please note that this does not reflect our grading structure as we have employees who are not yet harmonised on our grading structure.

Salary (FTE)	BME	White British	Not Stated	Total
£0 - £15,000	1	16	1	18
£15,001 - £20,000	113	552	161	826
£20,001 - £25,000	53	376	65	494
£25,001 - £30,000	37	299	62	398
£30,001 - £40,000	61	348	68	477
£40,001 - £50,000	25	205	23	253
£50,001 - £60,000	6	51	6	63
£60,001 - £70,000	3	14	6	23
£70,001 - £80,000	0	14	3	17
£80,001 - £90,000	1	2	0	3
£90,001 - £100,000	0	1	0	1
£100,001 - £120,000	0	2	3	5
Over £120,000	1	2	1	4
Total	301	1882	399	2582

Lowest Paid Employees

For the purpose of this pay policy statement, the definition of the lowest-paid employees adopted by the Council for the purposes of this statement is as follows:

“The lowest paid employees with the Council are those substantive employees who are paid on the minimum salary of the Council’s substantive pay structure equating to J1, £17,364 pa (£9.00 per hour) based on a 37 hour standard working week”.

The Council considers this to be the most appropriate definition as this is the lowest pay point and pay level on its substantive pay structure and which normally applies to new entrants to the lowest graded jobs within the organisation. The exception is employees who are employed on a Government sponsored apprenticeship programme that allows for them to be paid at nationally agreed apprenticeship rates.

A copy of the Council’s pay scales can be found at the end of this statement.

National Living Wage

As of 1st April 2016 the Council has adopted the National Living Wage for all employees, regardless of age, excluding those who are on apprenticeship contracts of employment.

Apprentices

An apprentice’s rate of pay is applied by age. The Council will no longer pay the minimum statutory rate of pay for most new apprentices. Apprentices will be paid according to their age when they start employment with the Council.

Age	Hourly rate of pay (as of 1 st April 2019)
16 – 18 *	£3.90 per hour
19 – 24	£7.70 per hour
Over 25	£8.21 per hour

*Once these apprentices have completed their first year, they will be moved to the rate of pay for 19 – 24 year olds.

Apprentices over the age of 25 will receive the current National Living Wage rate of pay.

Highest to Lowest Paid Employees

The tables below indicate the relationship between the highest and lowest paid employees.

Highest Pay	£170,340
Mean Pay	£28,265.16
Median Pay	£24,325
Lowest Pay	£17,364
Ratio of Mean to Highest	1: 6.0
Ratio of Median to Highest	1: 7.0
Ratio of Lowest to Highest	1: 9.8

Definitions:

Mean	Total pay for substantive employees divided by the number of substantive employees.
Median	The middle amount of pay of Swindon Borough Council (between the highest and lowest amounts).

The above rates of pay do not include any pension contributions. Information about the [pension schemes](#) and contribution rates can be found on pages 14 -16.

The recommendation of the Hutton Report into “Fair Pay in the Public Sector”, as recognised by the Government in the Code of Recommended Practice for Local Authorities on Data Transparency, was that a pay ratio of the salary of the Chief Executive compared to the median average salary in the organisation should be published.

The ratio between the highest paid salary and median average salary, the ‘pay multiple’ is 1:7.0. The Council does not have a policy on maintaining or reaching a specific ‘pay multiple’. However, the Council is conscious of the need to ensure that the salary of the highest paid employee is not excessive but is consistent with the needs of the Council as expressed in this policy statement.

The Hutton Review raised concerns about multiples in the order of 1:20 or higher, between the lowest and the highest paid employees in local authorities. The Council’s current ratio of lowest to highest is 1:9.8 and so is well below that level.

Pay Increases and Pay Progression

Where it has been recognised that a role has changed due to responsibilities, job content, redesign of the post, for example, a revised role profile will be submitted for re-evaluation in accordance with the Council’s approved job evaluation schemes. Further information about the Council’s approved [job evaluation](#) schemes can be found on page 11.

National Pay

The Council will apply any annual pay increases that are agreed by relevant national negotiating bodies.

Local Pay

Negotiation on pay is at local level but is mindful of national agreements.

Executive Contracts

There is no automatic right to salary progression based on time served for employees on Executive Contracts. Further information is outlined in the Council’s Executive Pay Strategy. A copy of the Executive Pay Strategy can be requested through hradviceandadmin@swindon.gov.uk.

Terms and Conditions

The Council reviewed its employees' pay, grading and terms and conditions when it implemented a new pay structure in 2010. The Council wanted to ensure that the new pay structure and terms and conditions were modern, fair and compliant with equal pay legislation. It was applied to all groups of employees, with the exception of:

- Chief Executive, Board Directors and Directors
- Staff employed on Soulbury Evaluation Scheme terms and conditions
- Youth workers on Joint Negotiating Committee (JNC) for Youth and Community Workers terms and conditions
- Teachers

All other groups of employees are covered by separate national terms and conditions of employment.

Job Evaluation

The Council's approach to pay is that pay related to a job grade which will be determined using a recognised job evaluation scheme. Jobs evaluated using either the Hay Evaluation Scheme or the National Joint Council (NJC) job evaluation scheme.

In the sections below, it indicates the differences between these two schemes and in what circumstances they are used.

Hay

The Hay Job Evaluation Scheme is widely used in both public and private sectors, primarily for managerial, administrative and clerical roles, but in some cases for all jobs within user organisations.

Jobs have been evaluated by trained assessors. A trained evaluation panel evaluates jobs against each of the elements within the scheme using detailed role profiles. The outcome of the evaluation assigns a profile and points score that shows the total size of the job.

All jobs from Q Grade and above, including Chief Officers, are graded using the Hay Job Evaluation scheme.

National Joint Council (NJC) Evaluation Scheme

The NJC scheme comprises thirteen factors of various weightings. The scheme was jointly developed and agreed between the local authority employers and the trade unions. A trained evaluation panel evaluates jobs against each of the elements of the scheme using detailed job descriptions. The outcome of the evaluation assigns a point's score that shows the total size of the job. The points score enables jobs to be placed in a rank order with other jobs in the organisation. All jobs from grade N and below are graded using the NJC Evaluation Scheme.

All roles are evaluated using either scheme; however the Council sets its own pay line. A copy of the Council's pay scales can be found at the end of this statement.

Pay Policies and Processes

The following section provides information on the pay policies and procedures that the council have in place. This includes the following:

- [Allowances](#)
- [Reimbursement of Subsistence or other Expenses](#)
- [Flexible Retirement, Early Retirement and Redundancy Payments Policy](#)
- [Termination Payments](#)
- [Relocation Expenses](#)
- [Honorariums and Acting-up Pay](#)
- [Election Payments](#)
- [Market Factor Supplements](#)

Allowances

An allowance is a payment made to staff by the Council that is not part of the basic contracted salary. Allowances are subject to taxation rules provided by the Inland Revenue and some are pensionable.

As part of the new pay and grading structure that was implemented in April 2010, allowances paid to employees were also reviewed and a new allowance structure was put into place.

In early 2017 the Council consulted with all employees on mileage rates. It was agreed that the Council's mileage rates will be paid in accordance with HMRC guidelines with effect from 23rd July 2017. Employees who use their car for business purposes can claim mileage using the current HMRC rates. A copy of the Allowances Policy can be requested through hrradviceandadmin@swindon.gov.uk.

Reimbursement of Subsistence or Other Expenses

In accordance with the requirements of the National Conditions of Service, the Council makes provision for the reimbursement of approved expenses. The Council has produced guidance for employees on travel and subsistence and this applies equally to all staff, irrespective of grade. A copy of the Travel and Expenses Policy can be requested through hrradviceandadmin@swindon.gov.uk.

Flexible Retirement, Early Retirement and Redundancy Payments Policy

On termination, redundancy payments and any discretion exercised in relation to retirement or redundancy will be paid in line with the Council's Policy on Flexible Retirement, Early Retirement and Redundancy Payments Policy. A copy of the policy can be requested through hrradviceandadmin@swindon.gov.uk.

The Council may, in certain circumstances, also apply its discretionary powers in relation to premature retirements and redundancies for Chief Officers. This approach is in line with Part 4 paragraph 85 of the Chief Officers of Local Authorities, Constitution Conditions of Service Salaries which states that "Authorities should bear in mind the possible application

of discretionary powers of premature retirement and permissible enhancements of benefits or redundancy payments”.

Termination Payments

The Council does not provide any further payment to employees leaving the Council’s employment other than in respect of payment for accrued leave, if agreed that it is not possible to take this leave before the date of leaving. Any other payments that are agreed or negotiated will be done so in line with current employment law practices.

Relocation Expenses

The aim of the scheme is to provide financial recompense to employees who need to move their main residence to take up an appointment with the Council. This scheme does not cover the purchase of a second property. Eligibility criteria will also apply, including the decision to offer relocation will be made prior to the post being advertised. Relocation expenses can be claimed up to £8,000. The Council’s policy requires repayment in part or in full if the employee leaves within 3 years of appointment. A copy of the Relocation Policy can be requested through hradviceandadmin@swindon.gov.uk.

Honorariums and Acting-up Pay

Employees on any grade may be awarded an honorarium payment or a higher duty allowance if they meet the criteria for either payment. The Council has a policy covering Honorariums and Acting-up Pay. This does not apply to Chief Officers.

A copy of this policy can be requested through hradviceandadmin@swindon.gov.uk.

Election Payments

Payments made to employees (including the Returning Officer and the Deputy Returning Officer) working during local, parliamentary or European elections or referenda are made in line with either the statutory fees or a local scale of fees agreed in consultation with Wiltshire Council. This could apply to Chief Officers.

Market Factor Supplements

All employees are appointed to posts, which have been evaluated and graded through either the NJC or Hay job evaluation schemes. Salaries are linked to the grading structure.

External labour market conditions can produce a situation in which staff with scarce skills and expertise can command higher salaries than the maximum provided under the current grading mechanism for that post. In these circumstances, based on evidence from the relevant labour market, it may be deemed appropriate to pay an additional Market Factor Supplement in addition to basic pay.

The relevant labour market may include another local authority or elsewhere in the public or private sectors. Market factor supplements are not linked to an individual’s actual or anticipated performance within the role. They are linked to the difficulty in recruiting to certain posts requiring specific skills or qualifications. The Council has produced guidance

for employees on Market Factor Supplements which can be requested through hradviceandadmin@swindon.gov.uk. The policy is not applicable to Chief Officers.

Pensions

This section includes information the following:

- [Auto-Enrolment](#)
- [Local Government Pension Scheme \(LGPS\)](#)
- [Changes to the Local Government Pension Scheme \(LGPS\)](#)
- [National Health Service \(NHS\) Pension Scheme.](#)

Auto Enrolment

Due to legislation ([The Pensions Act 2011](#)) there is a requirement for all employers in the UK to automatically enrol their workers into a qualifying pension scheme where they are not currently a member. Employees, who meet the criteria below (as of 1st April 2019) and are currently not in a workplace pension, will automatically be enrolled into the [Local Government Pension Scheme \(LGPS\)](#) or [Teacher's Pension Scheme \(TPS\)](#):

- Earn over £10,000 per year (or pro-rata pay period) (April 2019);
- Are age 22 or over; and
- Are under State Pension Age.

The aim of the legislation is to encourage people to save towards their retirement and have enough income to enjoy it. Employees can still opt to join the relevant pension scheme at any time. This has been clearly communicated to employees.

Local Government Pension Scheme (LGPS)

The Council offers all its employees access to the [Local Government Pension Scheme \(LGPS\)](#), in accordance with the statutory provisions of the scheme.

Any pension payments made on termination of employment either on grounds of redundancy, in the interests of the efficiency of the service or on grounds of ill health will be made within the statutory terms of the LGPS.

The discretions which the Council is able to apply under the scheme upon termination of employment are the same for senior employees as for all other employees who are LGPS members.

Changes to the Local Government Pension Scheme (LGPS)

With effect from 1st April 2014 the Local Government Pension Scheme changed. The table below shows the main provisions of the new 2014 scheme compared with the 2008 scheme.

	LGPS 2008	LGPS 2014																																										
Basis of pension	Final salary	Career Average Revalued Earnings (CARE)																																										
Accrual rate	1/60 th	1/49 th																																										
Pensionable pay	Pay excluding non-contractual overtime and non-pensionable additional hours.	Pay including non-contractual overtime and additional hours for part time staff.																																										
Contribution flexibility	No	Yes, members can pay 50% contributions for 50% of the pension benefit.																																										
Normal pension age	65	Equal to the individual member’s State Pension Age.																																										
Qualifying period for benefits	3 months	2 years																																										
Contribution rates	<table><tr><td rowspan="10">Please note: 2008 contribution rates are based on whole-time equivalent pay whereas the 2014 contribution pay bands will be based on actual salary.</td><td>Pay Bands</td><td>Contribution rates</td><td>Pay Bands 2019 / 2020</td><td>Contribution Rates</td></tr><tr><td>£0 to £13,500</td><td>5.5%</td><td>Up to £14,400</td><td>5.5%</td></tr><tr><td>£13,501 - £15,800</td><td>5.8%</td><td>£14,401 - £22,500</td><td>5.8%</td></tr><tr><td>£15,801 - £20,400</td><td>5.9%</td><td>£22,501 - £36,500</td><td>6.5%</td></tr><tr><td>£20,401 - £34,000</td><td>6.5%</td><td>£36,501 - £46,200</td><td>6.8%</td></tr><tr><td>£34,001 - £45,500</td><td>6.8%</td><td>£46,201 - £64,600</td><td>8.5%</td></tr><tr><td>£45,501 - £85,300</td><td>7.2%</td><td>£64,601 - £91,500</td><td>9.9%</td></tr><tr><td>Above £85,300</td><td>7.5%</td><td>£91,501 - £107,700</td><td>10.5%</td></tr><tr><td></td><td></td><td>£107,701 - £161,500</td><td>11.4%</td></tr><tr><td></td><td></td><td>More than £161,501</td><td>12.5%</td></tr></table>			Please note: 2008 contribution rates are based on whole-time equivalent pay whereas the 2014 contribution pay bands will be based on actual salary.	Pay Bands	Contribution rates	Pay Bands 2019 / 2020	Contribution Rates	£0 to £13,500	5.5%	Up to £14,400	5.5%	£13,501 - £15,800	5.8%	£14,401 - £22,500	5.8%	£15,801 - £20,400	5.9%	£22,501 - £36,500	6.5%	£20,401 - £34,000	6.5%	£36,501 - £46,200	6.8%	£34,001 - £45,500	6.8%	£46,201 - £64,600	8.5%	£45,501 - £85,300	7.2%	£64,601 - £91,500	9.9%	Above £85,300	7.5%	£91,501 - £107,700	10.5%			£107,701 - £161,500	11.4%			More than £161,501	12.5%
Please note: 2008 contribution rates are based on whole-time equivalent pay whereas the 2014 contribution pay bands will be based on actual salary.	Pay Bands	Contribution rates	Pay Bands 2019 / 2020		Contribution Rates																																							
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			More than £161,501	12.5%																																								
Lump sum option	Trade £1 of pension for £12 tax-free lump sum	Trade £1 of pension for £12 tax-free lump sum																																										
Death in service lump sum	3 x pensionable pay	3 x pensionable pay																																										
Death in service survivor benefits	1/160 th accrual based on Tier 1 health pension enhancement	1/160 th accrual based on Tier 1 ill health provision enhancement.																																										
Ill health provision	Immediate access to benefits depending on severity of the condition.	Immediate access to benefits depending on severity of the condition.																																										

These changes only apply to England and Wales. All Local Government Pension Scheme pensions built up before 1st April 2014 will be protected. Further information about the changes can be found on the [Local Government Pension Scheme website](#).

NHS Pension Scheme

The Council have employees who were transferred from the NHS. As part of the transfer agreement (TUPE), these employees were able to keep their NHS pension scheme and continue to contribute into that scheme.

Further information about the [NHS Pension Scheme](#) can be found on their website.

Pay Scales April 2019

NJC Pay Grades			New Rate (FTE)	Hourly Rate
Grade	Point	Payroll Point		
J	1	1	17,364	9.00
	2	2	17,743	9.20

Hay Grades		New Rate (FTE)	Hourly Rate
Grade			
Q		£31,369	£16.26
	Midpoint	£36,431	£18.88
		£41,494	£21.51

K	1	3	18,186	9.43
	2	4	18,574	9.63
	3	5	18,650	9.67
	4	6	18,945	9.82
	5	7	19,057	9.88
	6	8	19,301	10.00
	7	9	19,573	10.15

R		£35,437	£18.37
	Midpoint	£41,388	£21.45
		£47,337	£24.54

S		£40,276	£20.88
	Midpoint	£47,103	£24.41
		£53,928	£27.95

L	1	10	19,665	10.19
	2	11	19,967	10.35
	3	12	20,244	10.49
	4	13	20,817	10.79
	5	14	21,151	10.96
	6	15	22,059	11.43
	7	16	22,604	11.72

T		£47,043	£24.38
	Midpoint	£53,960	£27.97
		£60,876	£31.55

U		£52,954	£27.45
	Midpoint	£61,589	£31.92
		£70,222	£36.40

M	1	17	23,014	11.93
	2	18	23,384	12.12
	3	19	23,942	12.41
	4	20	24,325	12.61
	5	21	24,868	12.89
	6	22	25,265	13.10
	7	23	25,794	13.37
	8	24	26,207	13.58
	9	25	26,722	13.85

Executive Pay Scales

Level	Salary Range	
	From	To
CEO	156,437	194,963
Board Director	122,263	146,461
Director 5	102,950	120,883
Director 4	84,980	101,758
Director 3	70,258	84,113

N	1	26	27,218	14.11
	2	27	27,654	14.33
	3	28	28,159	14.60
	4	29	28,611	14.83
	5	30	29,100	15.08
	6	31	29,567	15.33
	7	32	30,040	15.57
	8	33	30,521	15.82
	9	34	30,980	16.06

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B&NES, SWINDON AND WILTSHIRE PARTNERSHIP
Suicide and Self-harm Prevention Strategy
Swindon Locality 2019 – 2023 (DRAFT)

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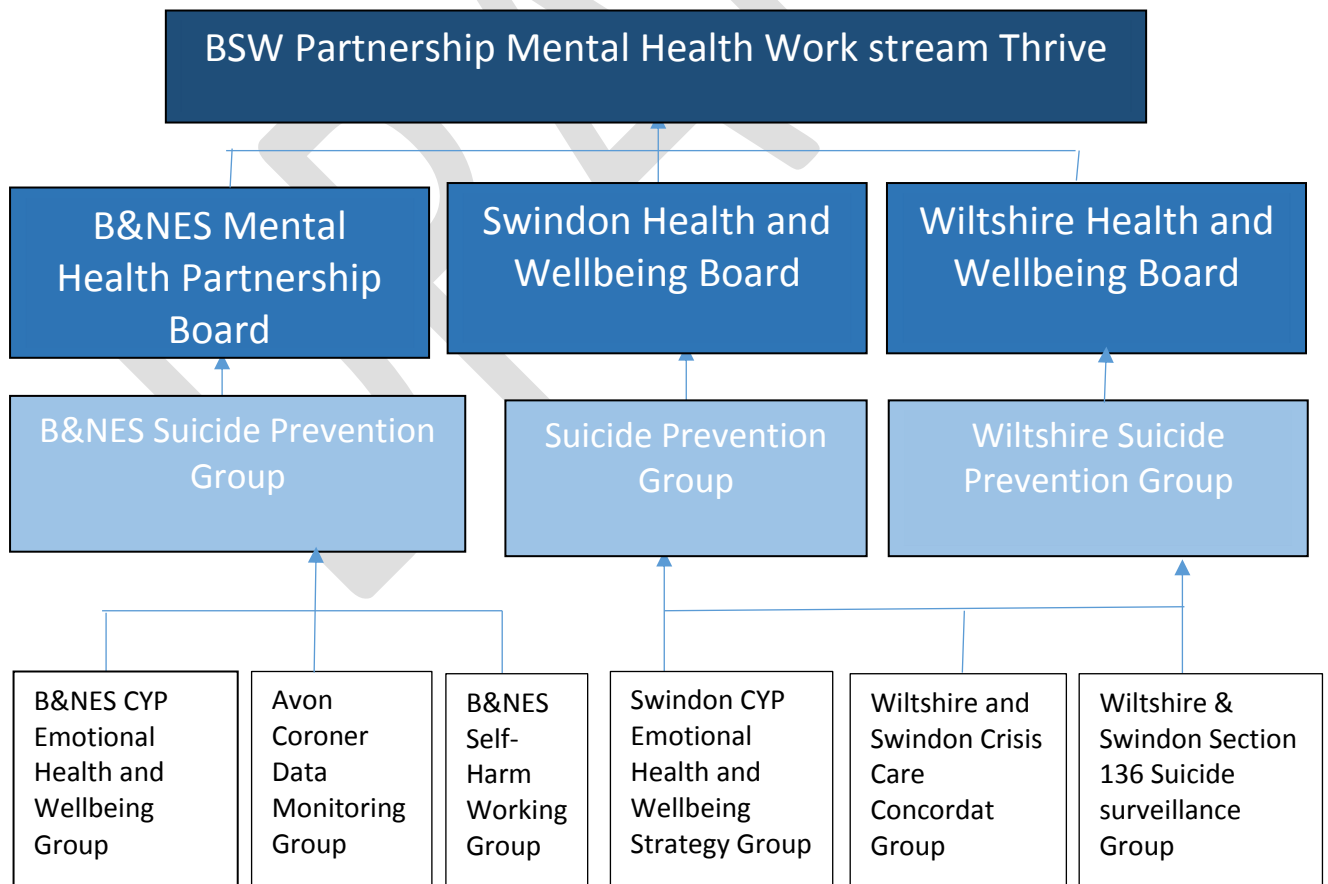
1. Introduction

This document outlines the commitment of B&NES, Swindon and Wiltshire (BSW) Partnership, formerly known as the Sustainability Transformation Partnership (STP) to work together to reduce suicide throughout the area. It acknowledges the benefits of working together to achieve this whilst maintaining a local focus garnering supporting from statutory, private, and third sector organisations, local communities and individuals. The first sections of this strategy reflect the commitments of the BSW Partnership with further local detail and commitment outlined from section 6.

2. Governance arrangements

Each local authority will maintain responsibility for their suicide prevention strategy and report to their own Health and Wellbeing or Partnership Boards. Joining strategies together at a B&NES, SWINDON AND WILTSHIRE (BSW) PARTNERSHIP level will ensure that we work together where synergies exist in a most efficient and effective way. Each local authority will localise the BSW Partnership Strategy and be responsible for their own action plans which can be brought together for reporting purposes.

Chart 1



*Swindon's suicide prevention group also includes a focus on a reduction of self-harm and implementation of the Better Mental Health Prevention Concordat.

3. Background

3.1 Definitions and risk factors for suicide

There are no standard definitions of suicide and self-harm but for use in this document the following definitions may provide clarity.

Suicidal act: Refers to all suicides and suicidal attempts

Suicide: In the UK, suicide is defined as deaths given an underlying cause of intentional self-harm or injury/ poisoning of undetermined intent

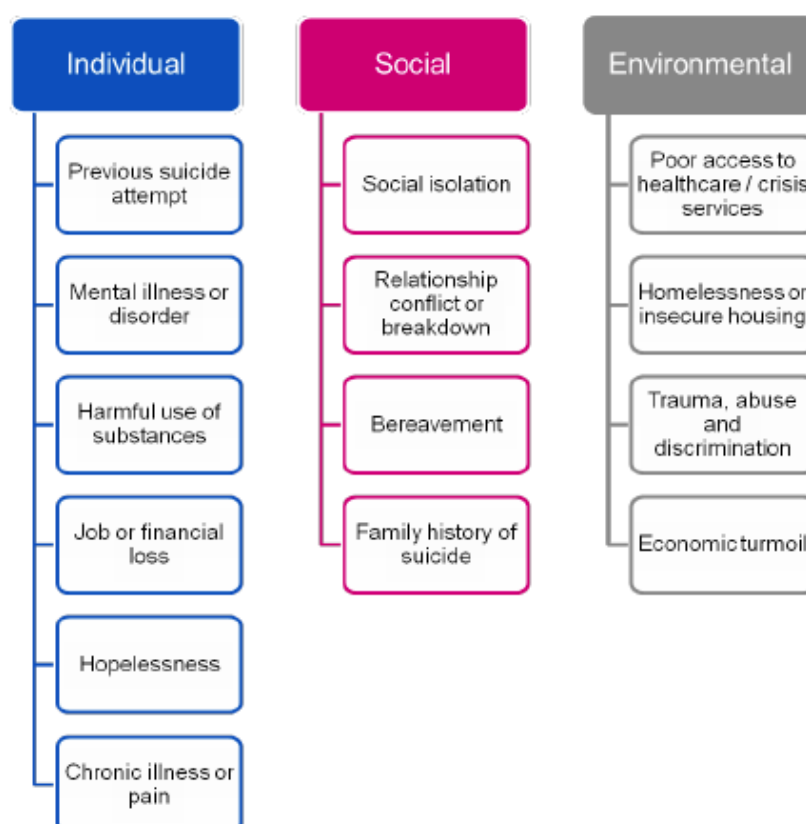
Attempted suicide: Act of self-poisoning or self-injury with suicidal intent, that is not fatal

Suicidal ideation: Recurring thoughts or preoccupation with suicide

Self-harm: Self-harm is defined as an intentional act of self-poisoning or self-injury, self-harm does not include attempted suicide. However, the PHE Fingertips data for hospital admissions for self-harm does not distinguish intent.

There is a great deal of complexity involved with an individual's decision to take their own life. However, these can be broken down into three domains highlighting key risk factors.

Chart 2. Key suicide risk factors, adapted from World Health Organisation, Preventing Suicide: A global imperative¹



3.2 Our vision

The premise for this document is that at a population level suicide and self-harm is preventable. At a BSW PARTNERSHIP level and local level we are committed to reducing the rate of suicide throughout B&NES, Swindon and Wiltshire.

Every suicide is a tragic event and has devastating impacts on families, friends and communities.

All partners within the BSW Partnership suicide prevention network are committed to:

- *Reducing suicide, attempted suicide and self-harm.*
- *Ensuring that no one will think that suicide is their only option*
- *Tackling the stigma associated with suicide*
- *Supporting those who are affected by suicide.*

The national ambition to reduce the suicide rate by 10 per cent by 2020/21 has been set by the Independent Mental Health Taskforce in the Five Year Forward View for Mental Healthⁱⁱ. The BSW Partnership will strive to achieve this by 2020/21 and exceed this target by the end of the strategy in 2023.

Whilst the premise for this strategy is that suicide is preventable this in no way reflects on those who have lost loved ones, patients or clients to suicide. It acknowledges that individuals, be they parents, children, the wider extended family, friends or professionals, strive to keep those who feel suicidal safe on a daily basis. This strategy and accompanying action plan aims to reduce the risk, support those who experience suicidal ideation and those who support and care for them by applying the evidence to develop a strategic approach to reducing risk of suicide and self-harm throughout the BSW partnership area.

3.3 Six myths about suicide

There are a number of common misconceptions around suicide and suicidal ideation. It is important that the facts around suicide are widely understood to allow the appropriate support to be provided when someone is in need.

1. **MYTH:** People who talk about suicide do not intend to do it.

FACT: People who talk about suicide may be reaching out for help or support. A significant number of people contemplating suicide are experiencing anxiety, depression and hopelessness and may feel that there is no other option.

2. **MYTH:** Most suicides happen suddenly without warning.

FACT: The majority of suicides have been preceded by warning signs, whether verbal or behavioural. Of course there are some suicides that occur without warning. But it is important to understand what the warning signs are and how to look out for them.

3. **MYTH:** Someone who is suicidal is determined to die.

FACT: On the contrary, suicidal people are often ambivalent about living or dying. Someone may act impulsively by drinking pesticides, for instance, and die a few days later, even though they would have liked to live on. Access to emotional support at the right time can prevent suicide.

4. **MYTH:** Once someone is suicidal, he or she will always remain suicidal.

FACT: Heightened suicide risk is often short-term and situation-specific. While suicidal thoughts may return, they are not permanent and an individual with previously suicidal thoughts and attempts can go on to live a long life.

5. **MYTH:** Only people with mental disorders are suicidal.

FACT: Suicidal behaviour indicates deep unhappiness but not necessarily mental disorder. Many people living with mental disorders are not affected by suicidal behaviour, and not all people who take their own lives have a mental disorder.

6. **MYTH:** Talking about suicide is a bad idea and can be interpreted as encouragement.

FACT: Given the widespread stigma around suicide, most people who are contemplating suicide do not know who to speak to. Rather than encouraging suicidal behaviour, talking openly can give an individual other options or the time to rethink his/her decision, thereby preventing suicide.

Source: World Health Organization, Preventing suicide: A global imperativeⁱ

4. Policy Context

4.1 National policy context

England's overarching mental health strategy 'No health without mental health' references suicide rates throughout as a key indicator of mental ill-health and states that suicide prevention can only be achieved by improving mental health across the whole populationⁱⁱⁱ.

In September 2012, HM Government published a strategy for the prevention of suicide in England, focusing on six key action areas^{iv}. In January 2017, the scope was extended to include self-harm^v:

1. Reducing the risk of suicide in high risk groups
2. Tailoring approaches to improve mental health in specific groups
3. Reducing access to means of suicide
4. Providing better information and support to those bereaved or affected by suicide
5. Supporting the media in delivering sensitive approaches to suicide and suicidal behaviour
6. Supporting research, data collection and monitoring
7. Reducing rates of self-harm as a key indicator of suicide risk

In the Five Year Forward View for Mental Health the Independent Mental Health Taskforce set a national ambition to reduce the suicide rate in England by 10 per cent by 2020/21ⁱⁱ. This and various other national policy documents such as, The National Suicide Prevention Alliance Public Health England Guidance and Support Manual for Local Suicide Prevention plans (2016)^{vi}, The NHS Long Term Plan (2019)^{vii}, and the All Part Parliamentary Group of Suicide and Self-harm Prevention Report, outline and reference the importance of suicide prevention with the requirement to develop local multiagency suicide prevention Group and develop a suicide prevention strategy and or action plan informed by a suicide audit.

The NHS Long Term Plan (2019)^{vii} states that the NHS will continue to build on the reduction in suicide rates that have been seen in recent years and "reducing suicides will remain an NHS priority over the next decade."

4.2 Regional policy context

The BSW Partnership (formerly known as the Sustainability and Transformation Partnership (STP)) has agreed to adopt the principles of Thrive to improve mental health and wellbeing across the footprint. The Thrive model aims to bring together statutory providers, voluntary services, businesses and communities to raise awareness of mental health, and to prevent mental health problems establishing and persisting. Suicide prevention is a key theme within the BSW partnership Thrive mental health work stream with a commitment to reduce suicide rates across the area by 10% by 2020/21 as laid out in the Five Year Forward View for Mental Health 2016ⁱⁱ.

4.3 Local policy context

Swindon Borough Council has a long established suicide audit or prevention group and Public Health has produced a suicide prevention audit and strategy since 2004.

At the beginning of 2018 the Swindon Health and Wellbeing Board, Swindon Borough Council Cabinet and Clinical Commissioning Group Governing Body signed up to the principles of the Prevention Concordat for Better Mental Health^{viii}. The purpose of the national Prevention Concordat is to provide a focus for cross-sector action to deliver a tangible increase in the adoption of public mental health approaches across local authorities, the NHS, public, private and VCSE sector

organisations, education settings and employers. This focus fits well with the Thrive approach. It outlines the three different levels of prevention including:

- Promoting good mental health and wellbeing
- Prevention of mental health problems, suicide and self-harm
- Improving the lives of people experiencing and recovering from mental health problems

In 2018 our suicide prevention group terms of reference were reviewed and amended to include a more holistic approach including responsibility to deliver commitments outlined in the Better Mental Health Prevention Concordat. A decision was taken to focus this work on those over the age of 18. Suicide Prevention for Children and Young People is now overseen by the Children and Young People Emotional and Mental Health Strategy Group.

In addition in 2015 Swindon adopted the Mental Health Crisis Care Concordat. This has resulted in the establishment of a multi-agency Swindon and Wiltshire Crisis Care Concordat Group with a focus of preventing mental health crisis, keeping people safe, improving responses to those in crisis and contributing to the parity of esteem for mental and physical health. Actions achieved by this group have contributed to suicide prevention within Swindon.

The CAMHS Transformation Plan identifies that our local priorities to provide support to our children and young people remain focused on ensuring there is robust provision to deliver early intervention and prevention, building individual resilience and reducing escalation of serious manifestations of poor mental health in self-harm and suicide – issues which continue to have a prevalence locally amongst our younger population.

4.4 Suicide by mental health patients

This multi-agency suicide prevention strategy primarily focuses on those who are not known to mental health services. There has been considerable work that has been undertaken by mental health service providers to reduce suicide and both adult and children and young people's mental health service providers in BSW partnership have their own strategies to reduce suicide. These are overseen by the Health Care Quality Improvement Partnership, however, it is important to summarise the key findings from these strategies to ensure our strategies align.

The Health Care Quality Improvement Partnership produces the National Confidential Inquiry into Suicide and Safety in Mental Health Annual Report. The 2018 report^{ix} found that there were 1,612 patient suicides in the UK in 2016, this figure has fallen in recent years. There were 106 suicides by in-patients in the UK in 2016, around 7% of all patient suicides, continuing a long-term downward trend. However, the fall has been slower in recent years, reflecting the pattern. The report highlighted that the highest risk period for patient suicide was in the first 2 weeks after discharge.

During 2006-2016 there were 909 suicides per year on average by patients who had a history of alcohol or drug misuse, 56% of all patients who died. Only a minority were in contact with specialist substance misuse services.

The national report outlined 10 ways to improve safety for mental health services which are outlined pictorially in the diagram below.

Chart 3



Adult Mental Health Services

Avon and Wiltshire Partnership NHS Trust provide adult mental health services throughout the BSW Partnership area. They have developed their own Suicide Prevention Strategy (2017 – 2020) to reduce the rate of suicide by mental health patients under their care. The focus of suicide prevention is now on the crisis team as this team now intervenes where previously patients would have been admitted. There is also a focus on patients who have been discharged from care, particular within two weeks of discharge where the suicide rate has not reduced to the same extent as inpatients and patients are known to be at risk. AWP have now developed a zero suicide ambition plan.

The National Confidential Inquiry into Suicide and Safety in Mental Health (NCISH)^x provide data for suicide rates in respect of all NHS trusts in England. The rates for 2011-13 and 2012-14 (the most up-to-date figures) for AWP show that, in 2011-13, AWP had a suicide rate of 11.4 per 10,000 people under mental health care, compared to the median of 7.65 for the rest of England.

The AWP strategy outlines actions that will be taken to:

- Reduce the risk of suicide in high risk groups
- Tailoring approaches to improve mental health in specific groups
- Reduce access to the means of suicide
- Learn from investigations and review into unexpected deaths
- Provide better information and support to those bereaved or affected by suicide
- Support the media in delivering sensitive approaches to suicide and suicidal behaviours
- Support research, data collection and monitoring.

AWP have produced an action plan to address these 7 priorities in order to achieve their aim of reducing suicide by 10% by 2020.

Children and Young People Mental Health Services

Oxford Health NHS Foundation Trust provide Children and Young People's mental health services across the BSW Partnership footprint. They have developed a Self-Harm and Suicide Prevention Strategy 2018 -2021 for all ages. This strategy acknowledges that suicide prevention is integral to patient care and a fundamental component of clinicians' daily activity. The strategy highlights large scale improvement work such as managing transitions that will impact on suicide prevention whilst identifying key areas for development based on accepted evidence and best practice.

Oxford Health Foundation Trust suicide prevention actions include:

- Safety planning – All patients at risk of self-harm or suicide will have a safety plan in place
- 48 hour follow ups after discharge from inpatients' services – All patients will receive face to face contact from the AMHT within 48 hours of discharge
- All clinical staff will receive suicide prevention training; suicide awareness training will be available for non-mental health and non-clinical staff
- Care interventions and support – Carers managing risk of self-harm or suicide are offered supportive and educational interventions
- Supporting families/carers bereaved by suicide – Families and carers bereaved by suicide are offered appropriate support and signposting
- Staff support – Staff affected by patient suicide are offered appropriate support and signposting.

In 2017 NCISH^{xi} carried out a study into suicide of children and young people in the UK and identified ten common themes:

Family factors such as mental illness	Academic pressures especially related to exams
Abuse and neglect	Social isolation and withdrawal
Bereavement and experience of suicide	Physical conditions that may have a social impact
Bullying	Alcohol and illicit drugs
Suicide related to internet use	Mental ill-health, self-harm and suicide ideas

Based on these themes NCISH developed the key messages below:

- Suicide in young people is rarely caused by one thing; it usually follows a combination of previous vulnerability and recent events
- The stresses the study identified before suicide are common in young people; most come through them without serious harm

- Important themes for suicide prevention are support for, or management of family factors (e.g. mental illness, physical illness, or substance misuse), childhood abuse, bullying, physical health, social isolation, mental ill-health and alcohol or drug misuse.
- Specific actions are needed on groups: 1) support for young people who are bereaved especially by suicide, 2) greater priority for mental health in colleges and universities 3) housing and mental health care for looked after children 4) mental health support for Lesbian, gay, bisexual and transgender (LGBT) young people.
- Further efforts are needed to remove information on suicide methods from the internet; and to encourage online safety, especially for under 20s.
- Suicide prevention in children and young people is a role shared by front-line agencies; they need to improve access, collaboration and risk management skills. A later, more flexible transition to adult service would be more consistent with our finding of antecedents across the age range.
- Services which respond to self-harm are key to suicide prevention in children and young people, and should work with services for alcohol and drug misuse, factors that are linked to subsequent suicide.

4.5 Suicide and Self-Harm Prevention Competencies

The House of Commons Health Committee has produced a report on suicide prevention^{xii}. One of its recommendations is that Health Education England's (HEE) Mental Health workforce strategy should ensure that there are enough trained staff to implement the Mental Health Taskforce recommendations in The Five Year Forward View for Mental Health.

Based on these recommendations the National Collaborating Centre for Mental Health (NCCMH) to develop a self-harm and suicide prevention competence framework.

Three competency frameworks have been developed:

- [Suicide and Self Harm Prevention Competencies – Adults and Older People](#)
- [Suicide and Self Harm Prevention Competencies – Children and Young People](#)
- [Suicide and Self Harm Prevention Competencies – Community and Public Health](#)

The first two (above) will be most relevant to health and social care professionals, some of whom will have had some training in mental health. The Community and Public Health competencies are aimed more at front line staff working with the general population – all ages. This will include professionals working with the public across all spheres of civic life, including health and social care, education, the voluntary and community sector and more, for example the teachers, police, transport workers, community workers, employers, staff and many others.

In addition there is a fourth report: [Suicide and Self-Harm Prevention Competencies – What does the competencies framework mean for my care?](#)

This report is aimed at service users and carers and outlines how the competencies framework relates to the support, care and treatment that service users and carers might expect to receive.

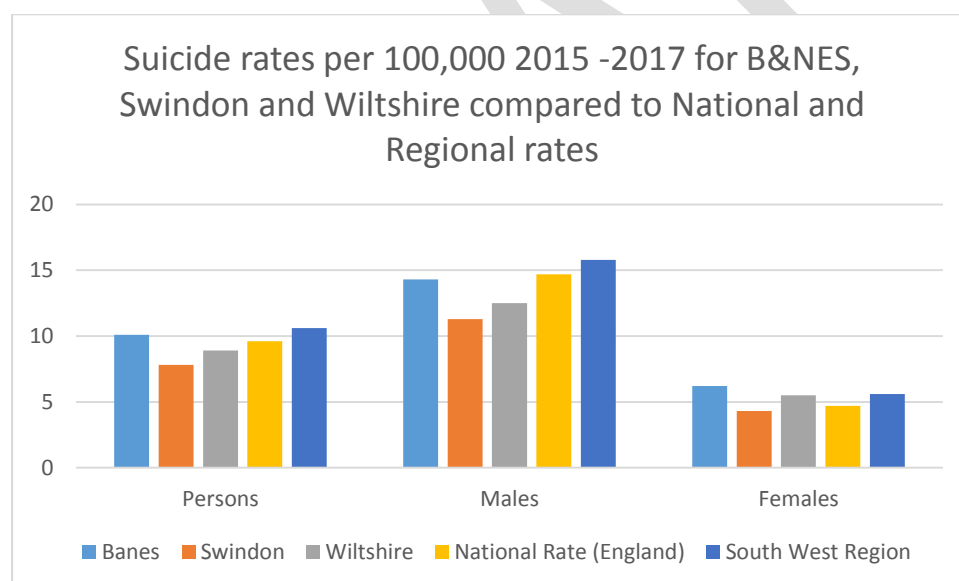
These frameworks are a useful resource for all individuals, organisations and agencies working with the general population.

5 Suicide and Self-Harm Profile for the BSW Partnership area

5.1 Suicide rates per 100,000 for the latest reporting period 2015 -17 for persons (overall), Males and Females in B&NES, Swindon, Wiltshire, the South West and England.

Local Authority	Persons	Males	Females
B&NES	10.1	14.3	6.2
Swindon	7.8	11.3	4.3
Wiltshire	8.9	12.5	5.5
National Rate (England)	9.6	14.7	4.7
South West Region	10.6	15.8	5.6

Chart 4

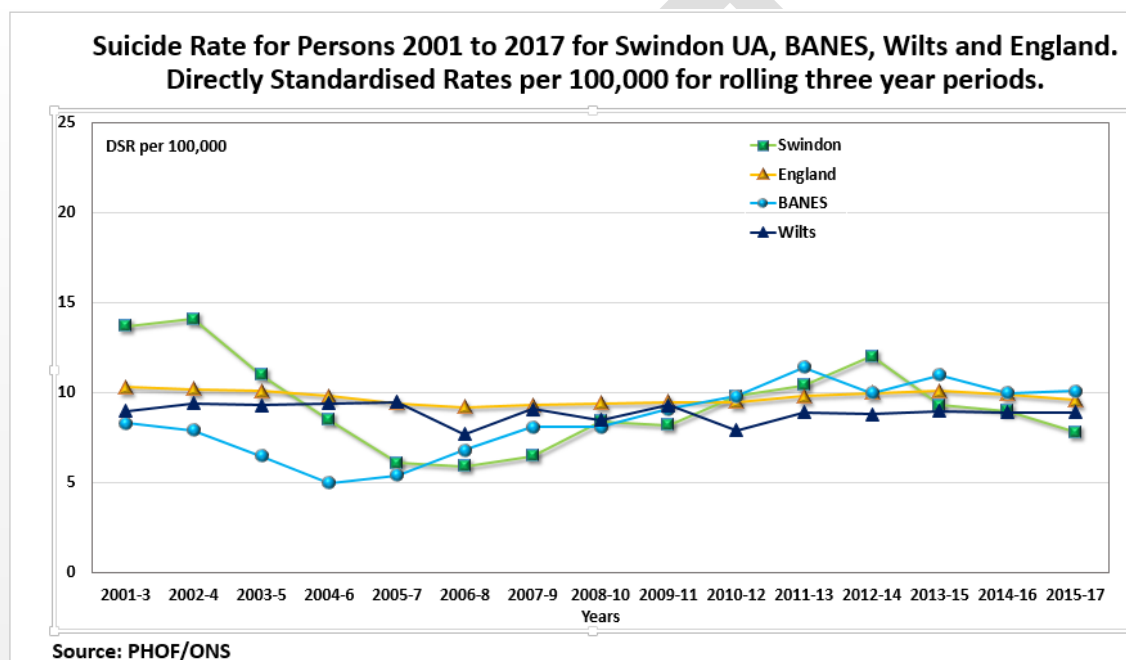


The chart above shows that for the latest reporting period 2015 -17 all three local authority areas had a lower suicide rate than the regional average for the South West. B&NES had a slightly higher overall rate than the national average although lower than the South West region. This was due to a higher rate of female suicides. In Wiltshire the overall rate was slightly lower than the national average but for females was slightly higher. In Swindon the rates were slightly below the national and regional averages overall and for males and females. None of the differences are statistically significant.

5.2 Trend in suicide rates – persons

The charts below show the suicide trend rates from 2001 - 2017 for each of the three Local Authority areas for the BSW Partnership. It can be seen that all three areas have a suicide rate generally in line with the national average. Swindon and B&NES rates have fluctuated over the period probably due to the relatively low numbers within both Authority areas. The rate in B&NES has slightly increased over the period from a very low rate back in 2004 -2006 to slightly above the national average in 2017. In Swindon the rate also rose between 2004 -2006 until 2012 -14 since when it has started to come down and is now slightly below the national average. The Wiltshire rate has been consistently just below the national rate for several years.

Chart 5

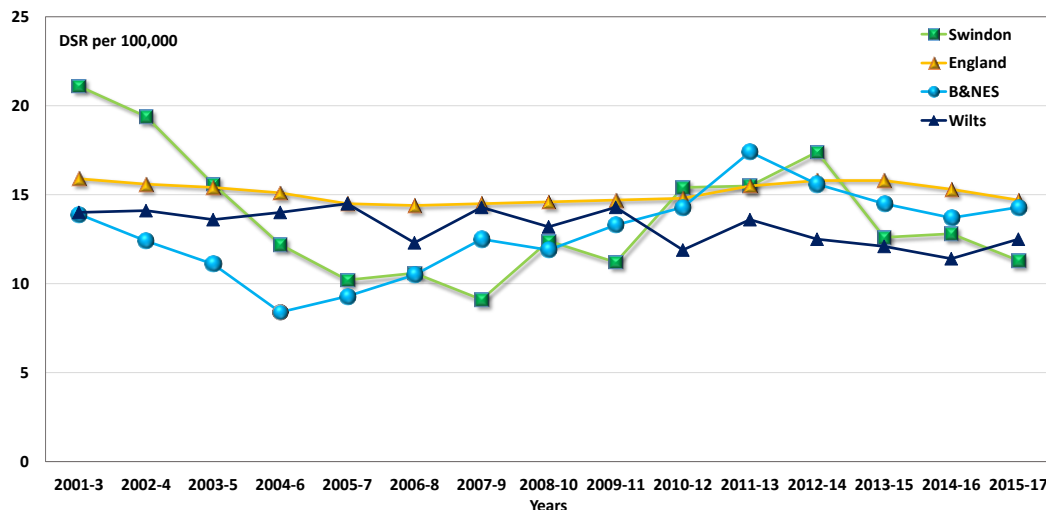


5.3 Trend in suicide rates - males

The suicide rates for males can be seen in the charts below. For all three areas the rates are slightly below the national average. The male suicide rates are very much higher than the female rates in all areas. This is in line with the national profile.

Chart 6

**Male Suicide Rate 2001 to 2017 for Swindon UA, B&NES, Wilts and England.
Directly Standardised Rates per 100,000 for rolling three year periods.**



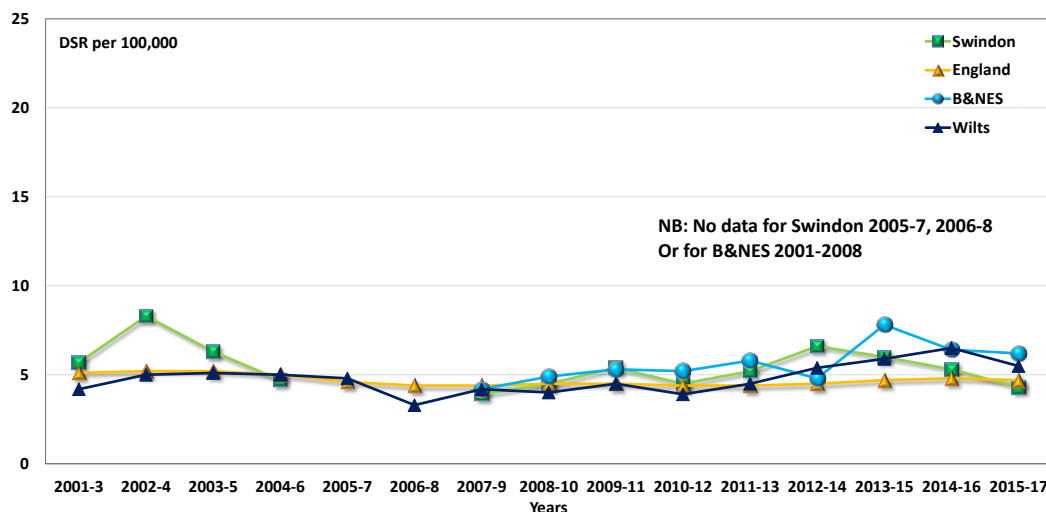
Source: PHOF/ONS

5.4 Trend in suicide rates - females

The charts below show the suicide rates for females for each of the Local Authority areas. The rates for Wiltshire and B&NES are slightly higher than the national average and for Swindon slightly below although again the figures are not statistically significantly different. All three areas saw a decrease in the last reporting period.

Chart 7

**Female Suicide Rate 2001 to 2017 for Swindon UA, B&NES, Wilts and England.
Directly Standardised Rates per 100,000 for rolling three year periods.**



Source: PHOF/ONS

5.5 Self harm profiles

Self-harm has been described by the National Institute for Health and Care Excellence (NICE)^{xiii} as “any act of self-poisoning or self-injury carried out by a person, irrespective of their motivation. This commonly involves self-poisoning with medication or self-injury by cutting.”

Self-harm often goes unreported and it is thought that hospital statistics underestimate overall rates of self-harm by about 60%. However, there are no comprehensive surveys of self-harm in the community at local level. Accident and emergency (A&E) data is of poor quality and lacks detail and therefore the most robust measure available is hospital admissions. They are used in the Public Health Outcomes Framework and other Public Health England tools to compare rates of self-harm between local authorities.

The charts below show the hospital admission rates for self-harm for each of the local authority areas against the national and regional rates per 100,000. It can be seen that the admission rates in Swindon are particularly high and although they had fallen slightly from 2014/15 in the last year they have increased again. The fall in admission rates for those between the ages of 10 – 24 years for Swindon fell at a greater rate but in the last year have increased. Admission rates for all ages for Wiltshire have slightly increased over the last couple of years and there has been a very slight increase in admissions for B&NES.

Chart 8

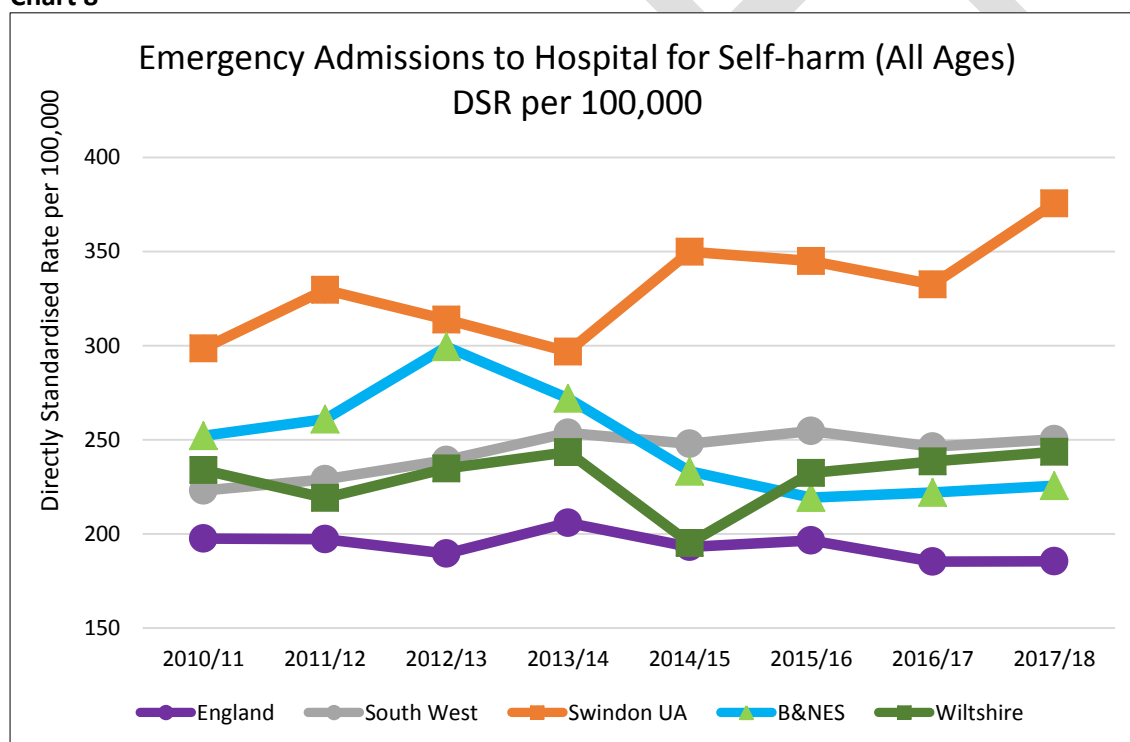
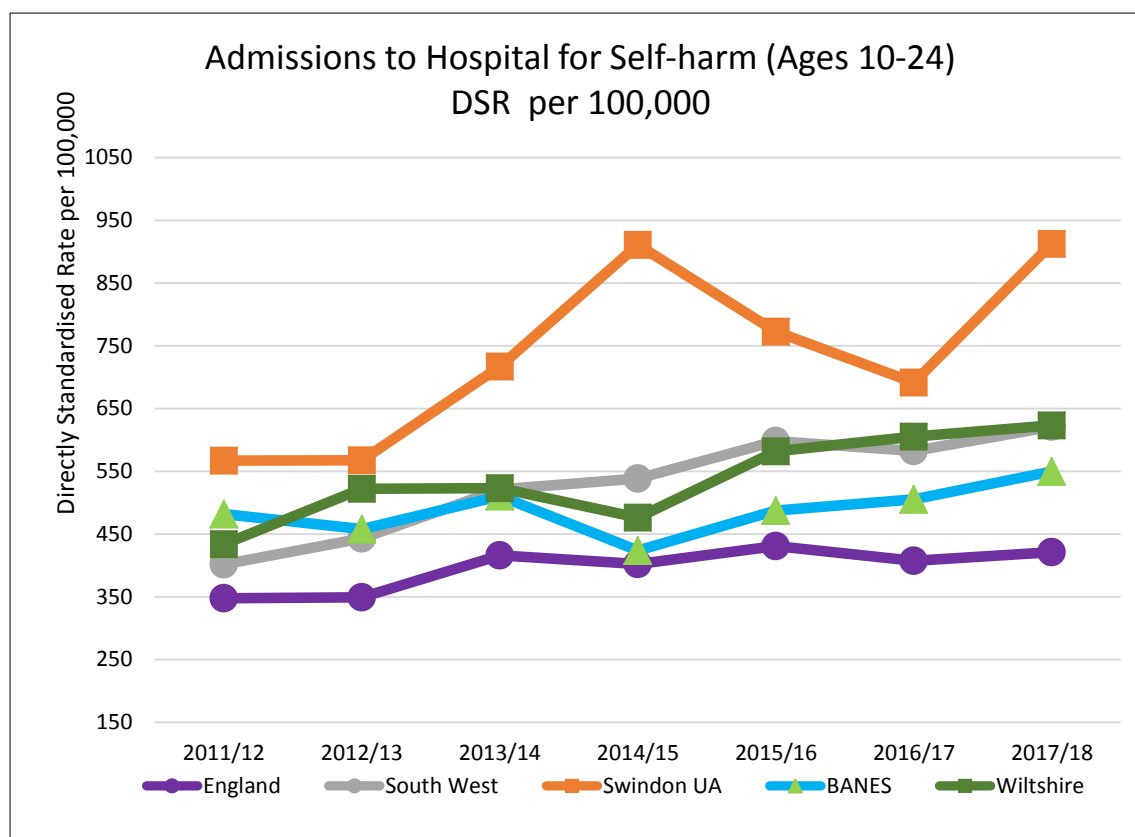


Chart 9



Research into self-harm and hospital admissions

As the rates of hospital admission for self-harm are higher than the national average across the South West Region the Directors of Public Health commissioned Public Health England South West Knowledge and Intelligence Service to carry out a piece of exploratory research into the causes. As Swindon's high rates are particularly high Swindon has been collaborating in this project.

The interim project report highlights a number of findings that are relevant to the BSW Partnership.

- Self-harm can mean many different things. Many people associate the term with cutting and in particular cutting without attempting suicide. Methods of self-harm can be divided into self-poisoning and self-injury. Studies of attendance at emergency departments show that approximately 80% of people have taken an overdose of prescribed or over the counter medication. However, general population studies have shown that for self-harm events that don't result in an admission, self-injury may be more common than self-poisoning.
- There are links between self-harm and other harms, e.g. for alcohol or substance misuse, unintentional injuries or assault, and many areas have high admission rates for more than one type of harm. There is scope for overlap, duplication and miss-recording between these and self-harm.

- Service provision that may be considered best practice may lead to higher admissions rates. For example at GWH, where previously patients who had self-harmed out of hours were invited to return to GWH for an appointment with the psychiatric liaison service are now seen on attendance. However, this has meant that they are admitted to the observation ward. Similarly close adherence to NICE guidance may also necessitate practices that result in more people, especially under 18s, being admitted awaiting psychiatric assessment.
- The England admission rates for self-harm are heavily influenced by the London region data. London has a large population (around 9 million compared to around 5.5m in the South West) and the lowest admission rates by some margin. When London is removed from the analysis of admission rates, the South West is found to be much more in-line with the remaining English regions. For females the South West has the highest admissions rates out of the regions at each age group but the gap to the England average without London is much reduced. For males, the South West is fairly typical of the English regions apart from London. Removing London from the analysis would also bring Swindon's rates closer to the (non-London) national average.
- Self-harm has increased in the South West in the last five years, especially amongst young people, young women and particularly due to overdoses.
- Self-harm is strongly linked to deprivation and studies which look at small area geographies show this more distinctly. It is also apparent that nationally the admissions gap between the most and least deprived has narrowed in recent years and that admissions may be rising fastest in some of the least deprived deciles.

The interim report detailed what is known about self-harm (in relation to admission rates) and explained what the key areas for further research are. These are being progressed by PHE and a report is expected in summer 2019. In the meantime the findings can be used locally as a 'checklist' of issues that LAs and CCGs can investigate depending on the local circumstances.

The priorities for further research include:

- Detailed analysis of A&E data including age and gender specific rates, repeat attendances and age standardised rates by LA and Trust. Followed by a comparison of A&E data with inpatient data.
- A qualitative study, led by the Care Forum, to explore patient journeys is underway in Swindon, Wiltshire, Bath and North East Somerset, Bristol, North Somerset, Somerset and South Gloucestershire. This is intended to find out more about what happens to people who come to A&E but aren't admitted and why do some people are admitted multiple times.
- Descriptive analysis of the crisis and liaison teams in each area including hours of operation and ages catered for and comparison with attendance and admittance rates.
- It is a strongly held view and one supported by some local analysis that a major problem in the South West is the number of young girls overdosing on analgesics. To explore this admission rates for young people (male and female) from intentional analgesic poisoning will be analysed.
- Conducting more detailed analysis into associated harms using age standardised rates and overlaying the rates for the individual harms over the top of the general harm indicator.

Additionally, looking at whether coding in the South West is more comprehensive (either in general or for particular types of harm).

- Investigating coding practices in the South West to show whether coders in the South West are coding differently from other areas.

6. Suicide Profile for Swindon

6.1 Trends in suicide rates for Swindon

Since 2003 the suicide rates in Swindon have tended to be slightly below the national average although they rose above the national average during the period 2012 -14. Since then they have been decreasing slowly and for the latest period 2015 -17 the rate is 7.8 per 100,000. This is below the national rate of 9.6 per 100,000.

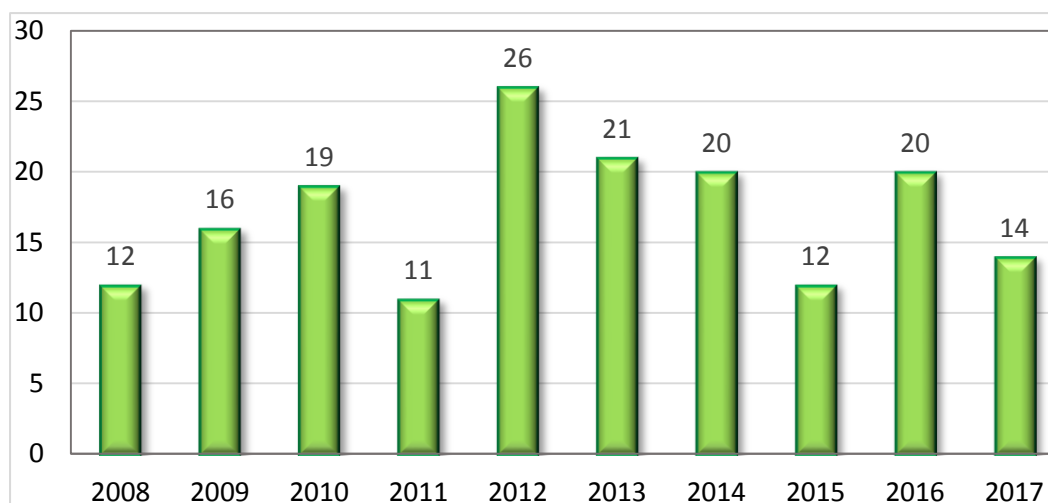
Chart 10 Suicide Rate for Persons 2001 to 2017 for Swindon UA and England. Directly Standardised Rates per 100,000 for rolling three year periods.



Source: PHOF/ONS

As can be seen in the figure below, the numbers of suicides in Swindon have fluctuated over time, probably due to the relatively low numbers rather than any particular causal factors in different years.

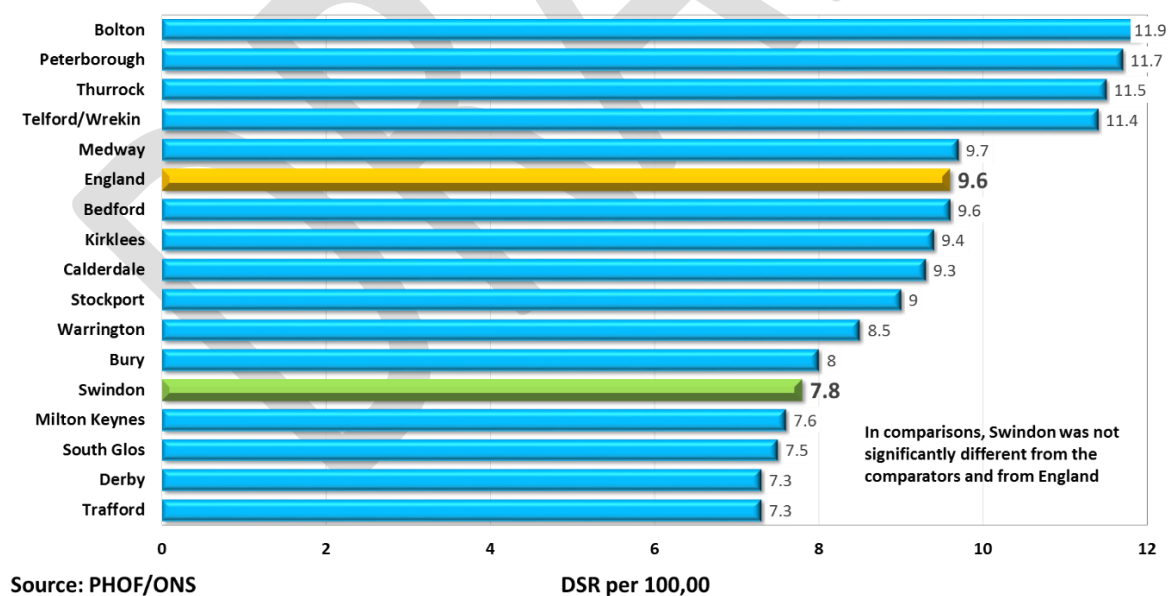
Chart 11. Number of Suicides in Persons in Swindon UA by Year 2008 to 2017.



Source: ONS

The chart below shows the Swindon suicide rate for all ages against Swindon comparator towns. This shows that the Swindon compares favourably to most of our comparators towns with the fifth lowest rate out of 16.

Chart 12. Suicide Rates for 2015-2017 for Swindon UA, Swindon's comparator towns and England. Directly Standardised Rates per 100,000.

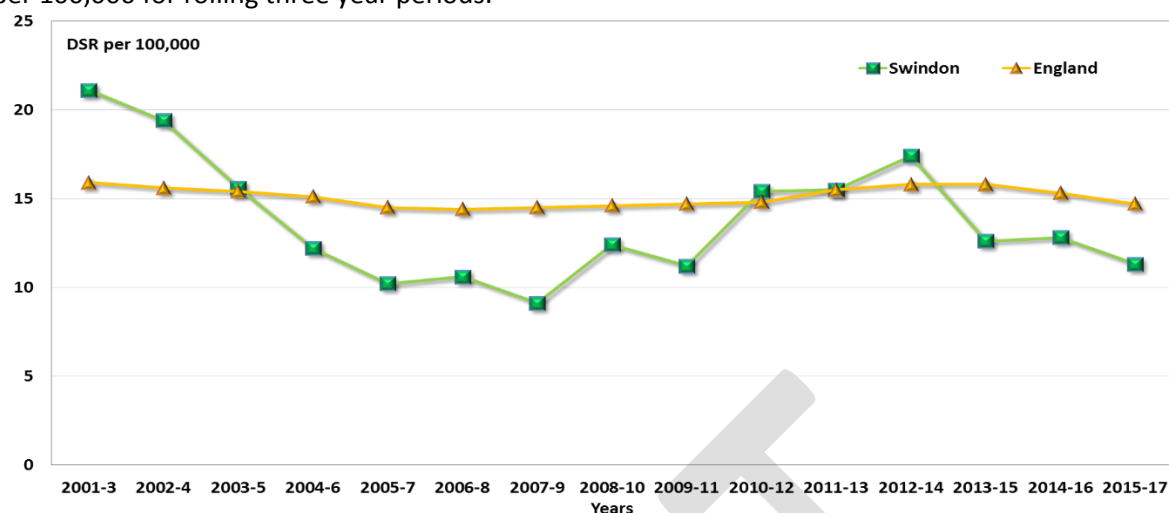


Source: PHOF/ONS

6.2 Demographic profile of suicides in Swindon

The suicide rate for males is higher than for females both nationally, regionally and locally. The graph below shows a decrease in male suicides in Swindon since 2012 -14. It is currently 11.4 deaths per 100,000 male population. This is below the national rate of 11.7, although the rates are not statistically significantly different.

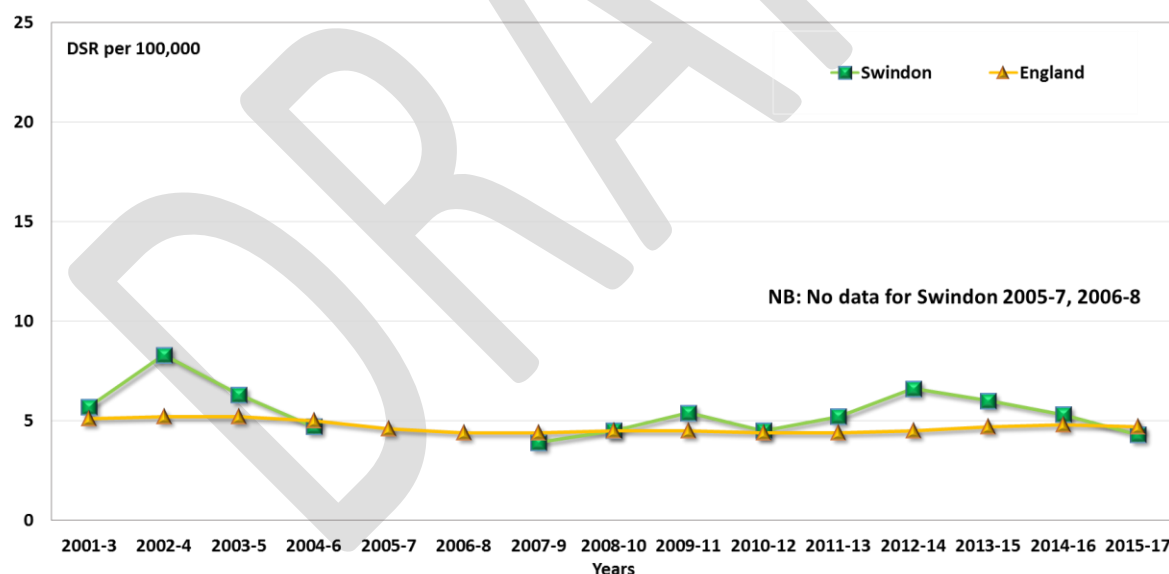
Chart 13. Male Suicide Rate 2001 to 2017 for Swindon UA and England. Directly Standardised Rates per 100,000 for rolling three year periods.



Source: PHOF/ONS

Since 2011 the suicide rate for females in Swindon has been above the national average. However, since 2012 -14 the rate has been decreasing and in 2015 -17 the rate was very slightly below the national average at 4.3 per 100,000. The national rate was 4.7 per 100,000.

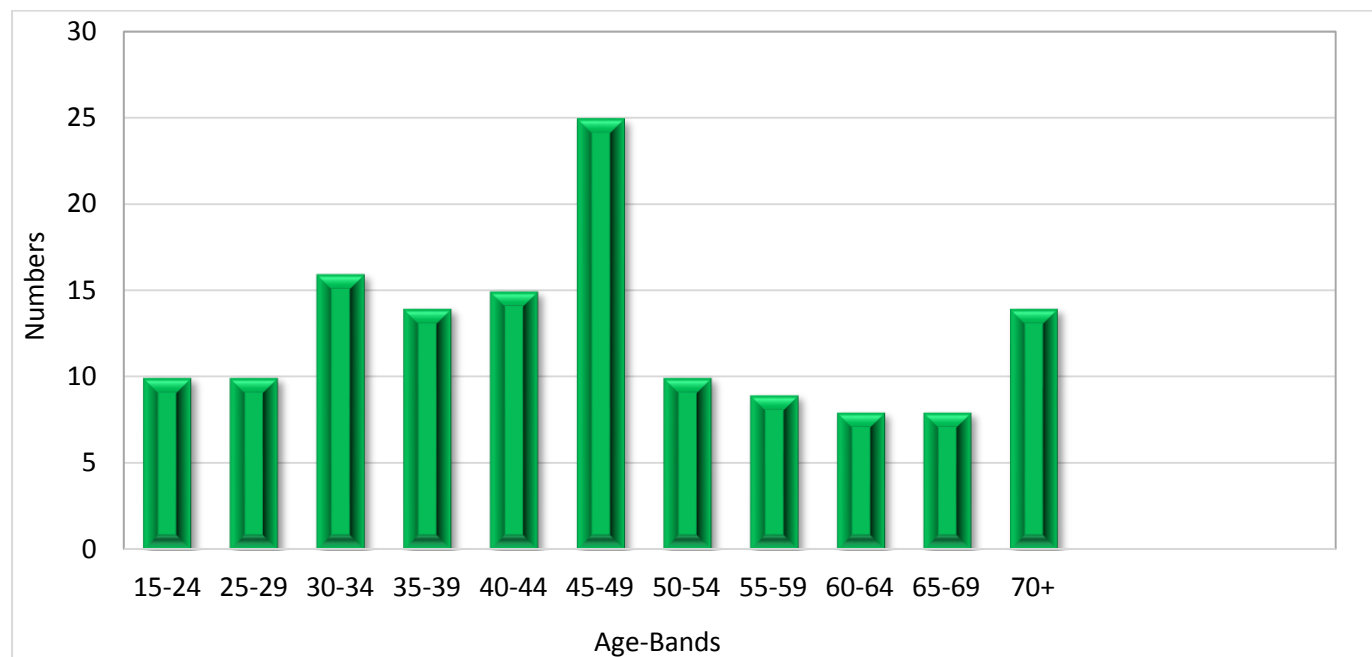
Chart 14 Female Suicide Rate 2001 to 2017 for Swindon UA and England. Directly Standardised Rates per 100,000 for rolling three year periods.



Source: PHOF/ONS

The graph below shows a spike in numbers of suicides in Swindon in people in their forties, with men accounting for the majority of these suicides. Suicide is the biggest killer of men under the age of 50.

Chart 15 Suicide Deaths by Age-bands in Swindon in 2008-2017 (total = 139).



Source: Suicide Audit Database/Wiltshire Coroner

Deaths by those under 18 years of age

Deaths for those under the age of 18 are reviewed by the Child Death Overview Panel. Since 2011 there have been less than 5 confirmed deaths by suicide for those living in Swindon.

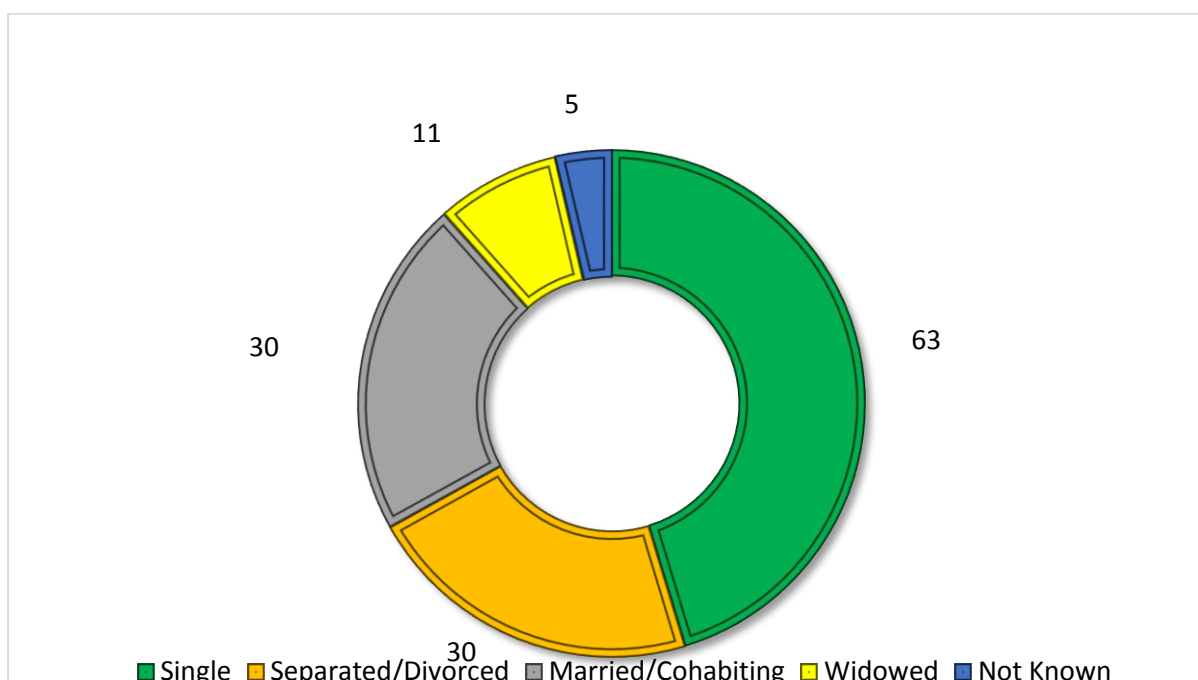
Local Suicide Data

The following data has been extracted from Swindon's local suicide audit database. The coroner informs Public Health of deaths by suicide following the inquest. Information is then provided by our local mental health services, substance misuse services, General Practices, and Great Western Hospital to gain a more detailed profile of those who have died by suicide. To avoid duplication, as deaths by those under 18 years of age are reviewed in more detail by the Child Death Overview Panel local suicide audit does not include those under 18.

Marital Status

The majority of suicide deaths (66.9%) from 2008-2017 were of people who were single or separated/divorced, as illustrated in the figure below.

Chart 16 Marital Status in Suicide Deaths in Swindon Population 2008-2017 (total = 139).

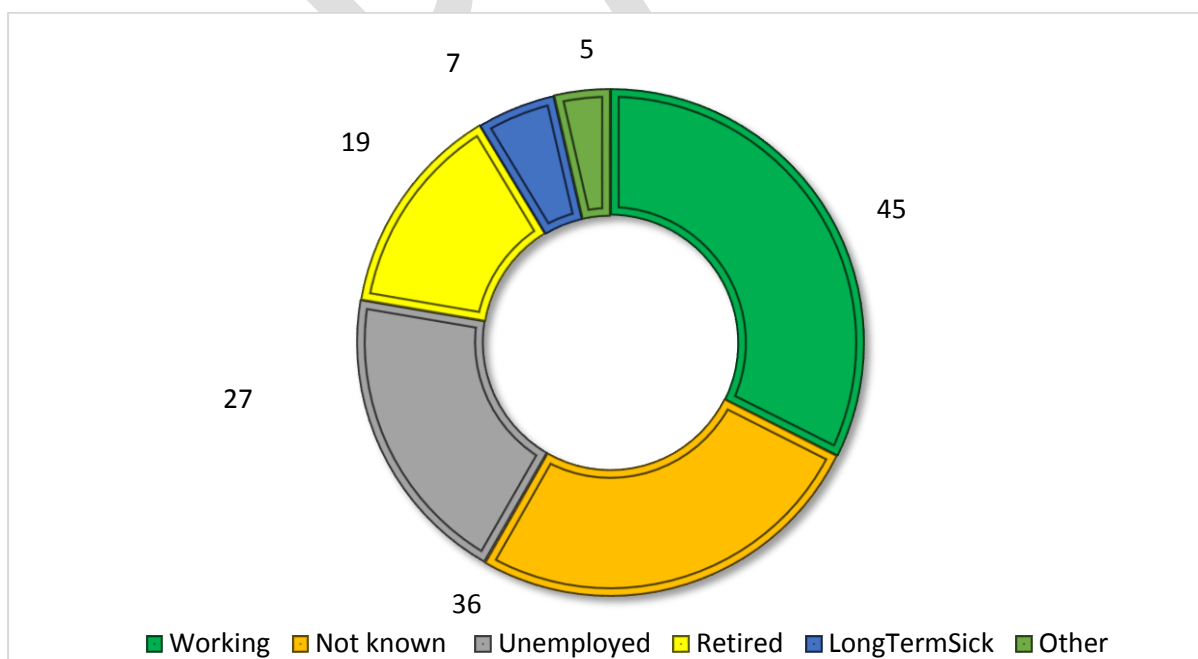


Source: Suicide Audit Database/Wiltshire Coroner

Occupational Status

There were more suicide deaths in employed (45 deaths) compared to unemployed people (27 deaths), as illustrated below. Other includes students, carers and housewives.

Chart 17 Occupational Status in Suicide Deaths in Swindon Population 2008-2017 (total = 139).



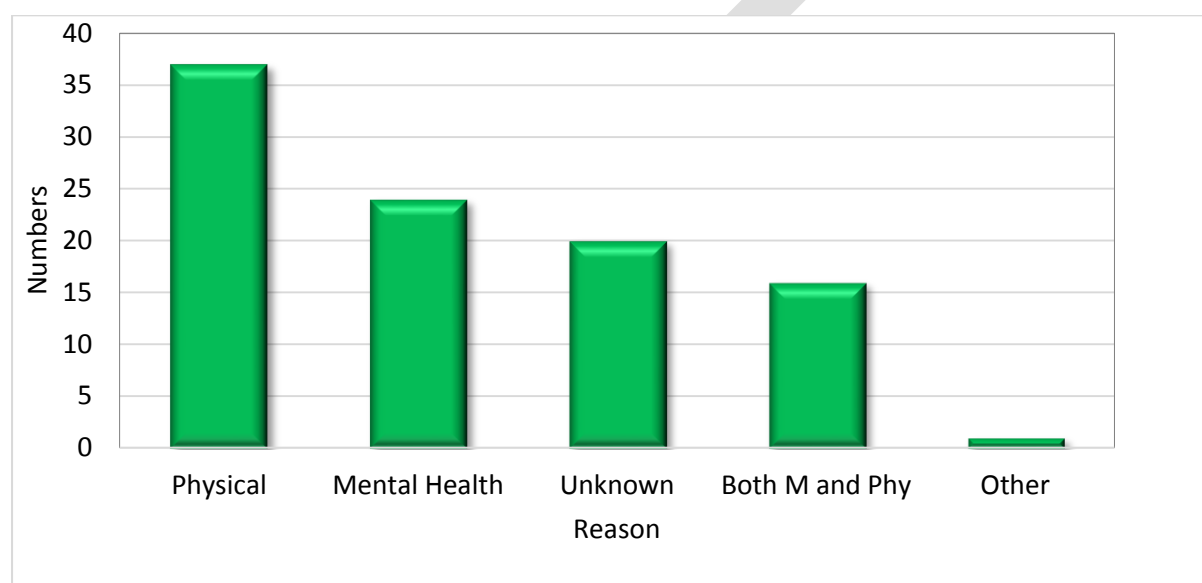
Source: Suicide Audit Database/Wiltshire Coroner

6.3 Service use profile for suicides in Swindon

Contact with GP services

The graph below shows that there were more contacts with GPs for physical health (37.8% of contacts) than mental health (24.5%) reasons by people who subsequently died by suicide in Swindon from 2008-2017. Out of 98 suicide deaths from 2008-2017 with primary care records available, a mental health assessment was on record for 55 people – there was no mental health assessment, or a blank one, on record for 43 people. Thirty of the 98 had a mental health diagnosis; 35 did not, and this was unknown for 33 people.

Chart 18 Reasons for contact with GP before Suicide Deaths in Swindon Population 2008-2017 (total = 98).



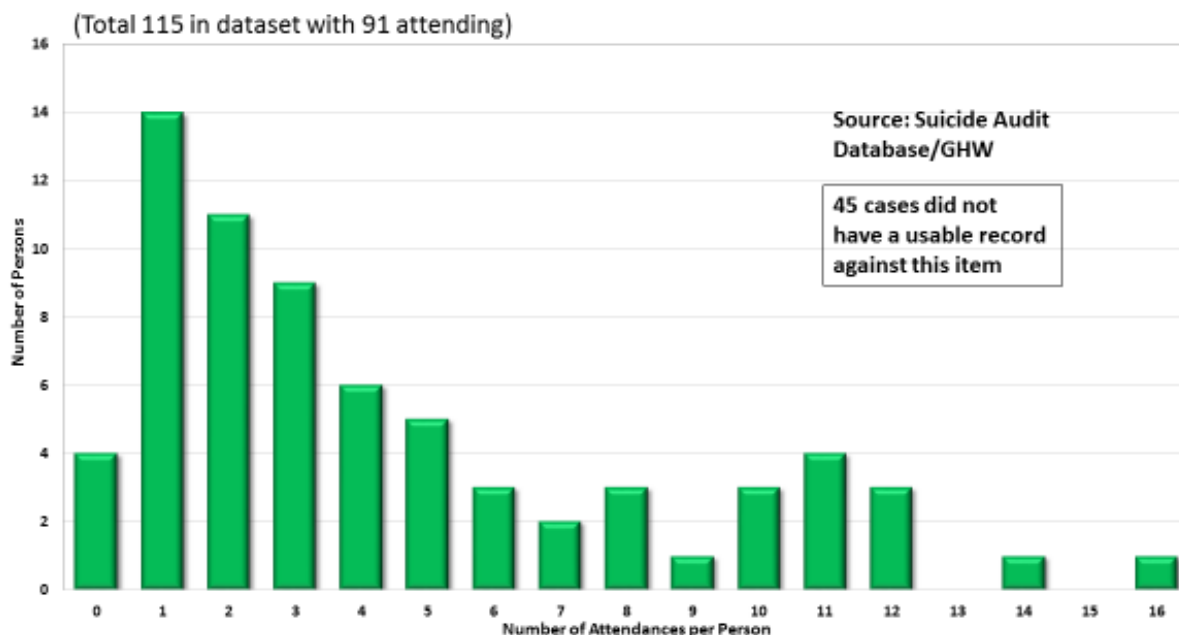
Source: Suicide Audit Database/Primary Care

Contact with Great Western Hospital

Regarding the secondary care service user profile for people who died by suicide between 2008-2017, there were 115 people in the database, of whom 91 attended GWH. Of these 91, 19 had had a psychosocial assessment recorded, 62 had not and this was not recorded for 10 people. As illustrated in the graph below, about half of the 91 people who attended GWH (45) attended 1 to 5 times, and **18 people attended 8 or more times**. However, 45 people did not have a usable record for this item. Reasons for attending were largely physical health-related, e.g. shoulder injury, sinus problem, wasp sting, swollen knee, cerebrovascular accident. With regard to self-harm, there were 11 attendances due to deliberate self-poisoning and overdose, 8 attendances due to lacerations (some recorded as deliberate), and two other attendances coded as Other Deliberate Self Harm. 53 attendances were in the year prior to the death.

Chart 19

Total Number of Attendances at GWH in Swindon Suicide Deaths in 2008-2017



Source: Suicide Audit Database/GWH

Contact with substance misuse services

Since 2011 data has been collected from the local substance misuse treatment provider. Of the 83 records in the database less than 5 were known to substance misuse services. The substances of misuse include heroin, crack, alcohol and cannabis. There was no recording for 10 individuals.

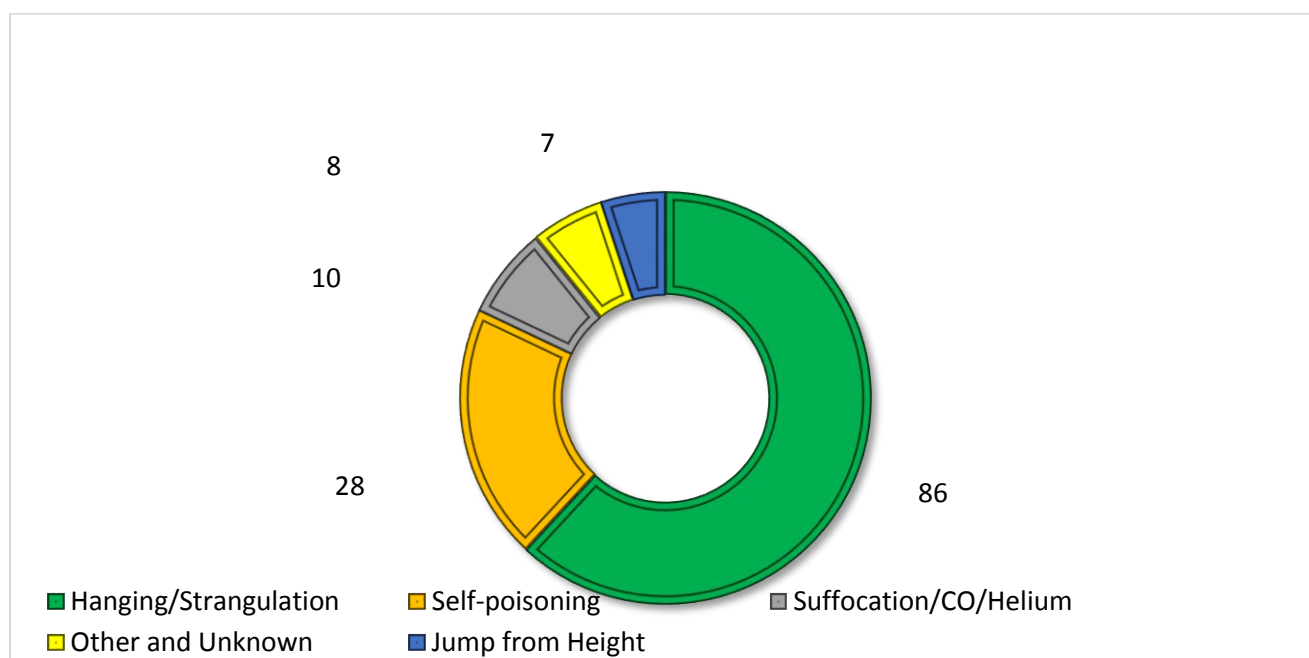
Contact with Probation

In 2019 we have started to collect data from probation. There is currently no data available.

[6.4 Methods used in suicides in Swindon](#)

The figure below illustrates that hanging/strangulation is the most common method of suicide in Swindon, accounting for 61.9% of deaths from 2008-2017. Self-poisoning is the next most common method, accounting for 20.1% of deaths. These findings and proportions mirror national trends in male suicides. However, in female suicides, at a national level, self-poisoning is almost as common a method (38.3% of deaths) as hanging (42.1%), according to ONS figures for 2017. There is variation within the local profile for males and females. For females, 40% died by hanging and 35% by self-poisoning compared to 64% and 15% respectively for males.

Chart 20 Methods in Suicide Deaths in Swindon Population 2008-2017 (total = 139).



Source: Suicide Audit Database/Wiltshire Coroner

7. Self-Harm Profile for Swindon

Self-harm is an expression of personal distress and there are varied reasons for a person to harm themselves irrespective of the purpose of the act. Self-harm is poorly understood in society and people who harm themselves are subject to stigma and hostility. There is a significant and persistent risk of future suicide following an episode of self-harm and the risk is higher with increasing age at initial self-harm.

In contrast to the trends in completed suicide, the incidence of self-harm has continued to rise in the UK over the past 20 years and, for young people at least, is said to be among the highest in Europe.

Self-harm is one of the top five causes of acute medical admission and those who self-harm have a 1 in 6 chance of repeat attendance at A&E within the year. Aside from the obvious danger of death, self-harm and suicide attempts can be seriously detrimental to an individual's long-term physical health, if they survive. Paracetamol poisoning is a major cause of acute liver failure. Self-cutting can result in permanent damage to tendons and nerves, not to mention scarring and other disfigurements. The NICE guidelines on self-harm note that people who have survived a medically serious suicide attempt are more likely to have poorer outcomes in terms of life expectancy.

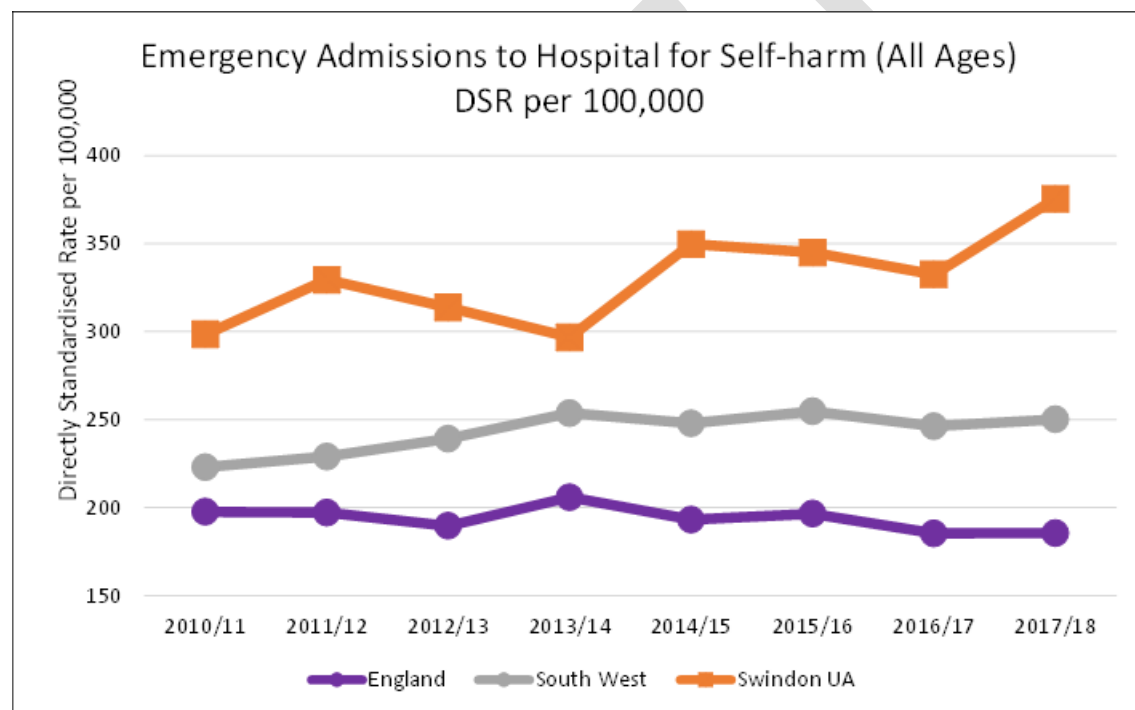
Those at greater risk of self-harm include women, young people, older people (who are more likely to do so in an attempt to end their life), people who have or are recovering from drug and alcohol problems, people in prison, people who are lesbian, gay, bisexual, transsexual or gender reassigned, socially deprived people living in urban areas and women of South-Asian ethnicity. Individual elements including personality traits, family experiences, life events, exposure to trauma, cultural beliefs, social isolation and income also heighten the risk of self-harm. Other factors such as education, housing and wider macro-socioeconomic trends such as unemployment rates may also contribute directly, or by influencing a person's susceptibility to mental health problems.

Self-harm often goes unreported and it is thought that hospital statistics underestimate overall rates of self-harm by about 60%. However, there are no comprehensive surveys of self-harm in the community at local level. Accident and emergency (A&E) data is of poor quality and lacks detail and therefore the most robust measure available is hospital admissions. They are used in the Public Health Outcomes Framework and other Public Health England tools to compare rates of self-harm between local authorities.

7.1 Local Hospital admission rates for self-harm

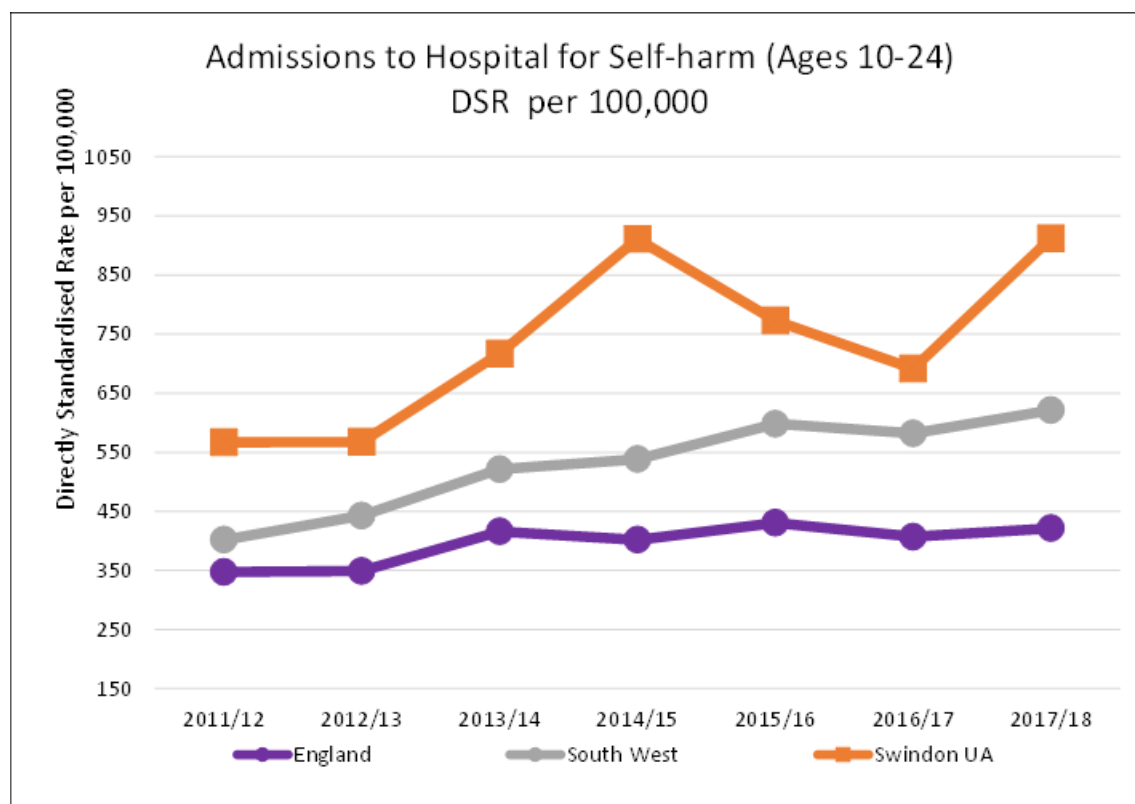
Swindon's hospital admission rates for self-harm are significantly higher than the England rates for both the all age measure and the young person's measure for 10 to 24 year olds (see below figures). The slight improvement between 2014/15 and 2016/17 has been reversed in the latest reporting period.

Chart 21 Admissions to hospital for self-harm (all ages) per 100,000



Source: Hospital Episode Statistics (HES) Copyright ©

Chart 22 Admissions to hospital for self-harm (10-24 years) per 100,000



Source: Hospital Episode Statistics (HES) Copyright ©

The distribution of excess admissions¹ was analysed in Swindon. 23% of all excess admissions were in males aged 25-44 years, 24% in females aged 10-24 years and 20% in females aged 25-44 years. Therefore, in addition to focussing on females in the 10-44 age range, and in particular the 15-19 year-olds, Swindon should also investigate males in the 25-44 age range and in particular, those aged 35-39 years, who accounted for 13% of the excess in 2016/17.

¹ The number of excess admissions is the observed number of admissions minus the expected number of admissions. The percentage of excess admissions is this excess number of admissions compared to the expected number of admissions.

8. Areas for Action

The priority areas for Swindon have been built around the recommendations in the national suicide prevention strategy. The following section will outline recommendations to address these priorities. Further detail can be found in the action plan.

8.1 Reducing the risk of suicide in high risk groups

People in care of mental health services

National data^{ix} showed that from 2006-2016, nearly a third of all suicides were by mental health patients. Patients are at particular risk in the first two weeks post-discharge.

- Continue to implement the AWP Suicide Prevention Strategy (2017-2020) for adult mental health service patients, and the Oxford Health Self-Harm and Suicide Prevention Strategy (2018 -2021) for children and young people's mental health service patients.
- Following death of a patient by suicide, Swindon CCG, SBC Public Health and service providers should work more closely in partnership to review these deaths and share lessons learned.
- As recommended in the national suicide prevention strategy^v, promote the Information Sharing and Suicide Prevention Consensus Statement, published by the Department of Health in 2014, which encourages health professionals to share information about someone at risk of suicide with family members and friends.

Specific occupational groups, such as doctors, nurses, veterinary workers, agricultural workers and construction workers

Risk of suicide and self-harm is higher among those who are unemployed. However, evidence indicates that certain occupational groups including doctors, nurses, veterinary, agricultural and construction workers are also at a higher risk of suicide.

- Raise awareness of suicide risk among high risk occupational groups in Swindon, and signpost to local mental health support available.
- Continue to work with employers through the Mindful Employer Network to promote mental health in the workplace, and continue to promote and expand this network.

Young and middle aged men

Despite an encouraging reduction in suicide rates amongst men over the past four years both nationally and locally, suicide is the biggest killer of men under the age of 50. Men in Swindon are just under three times more likely to take their own life than women. The suicide rate is highest among men in mid-life (35-64 years), particularly among those in their forties, compared to other age groups. Research^{xiv} has shown that men are less likely than women to seek help for mental problems and that stigma associated with such problems acts as a major barrier to seeking help.

- Raise awareness of and tackle the stigma around mental health problems among the public, particularly men, through implementing national and local campaigns in Swindon. Examples of national campaigns to raise awareness around mental health and tackle stigma include Time To Change (led by third sector organisations Mind and Rethink Mental Illness and

funded by the Department of Health, Comic Relief and the Big Lottery Fund), and campaigns targeting men specifically such as the Men's Sheds Associations and the Campaign Against Living Miserably (CALM).

- Ensure that these campaigns target settings that are typically frequented by men, such as sport settings (as recommended in the national suicide prevention policy) like football clubs and barber shops. The workplace will also be a key setting in which to raise awareness of and promote mental health, given the spike in suicides in Swindon among men in their forties, and that there are more suicides among working people in Swindon, rather than unemployed people.

People in contact with the criminal justice system, substance misuse services and homelessness services

Although there is no prison within Swindon Borough Council authority area we do have a police custody unit and support those leaving prison through the local probation service. Research^v has shown that 9 out of 10 people in prison have a substance misuse or mental health problem and that those released from prison are vulnerable and at risk. Local findings from Threshold Homelessness Health Needs Survey found that nearly 40% of those who were homeless in Swindon had had custodial sentences and many were using drugs or alcohol or in recovery. Nationally, over half of all deaths of homeless people in 2017 were due to three factors: accidents (including drug poisoning) accounted for 40%, suicides accounted for 13% and diseases of the liver accounted for 9%^{xv}

- Continue to raise awareness among staff within the police custody unit, the local probation service, substance misuse services and homelessness services of mental health problems and encourage them to be vigilant for signs of suicide risk among clients/offenders.
- Ensure the above services have mental health, suicide and substance misuse risk assessment procedures in place, and that staff refer individuals identified as being at risk to community-based or secondary mental health support, and/or to Turning Point, Swindon's substance misuse treatment service provider, as appropriate.
- Target and offer people in contact with the criminal justice system, substance misuse services and homelessness services mental health support through outreach workers within community mental health and wellbeing services.
- Ensure that all mental health service providers and substance misuse service providers are aware of dual diagnosis issues, and have pathways and referral routes to work in partnership with individuals with dual diagnosis problems.

Lesbian, Gay, Bisexual, Transsexual (LGBT) people

Evidence shows that LGBT people are more at risk of suicide ideation and suicide. One study in the UK found that 34.4% of trans adults had attempted suicide at least once and almost 14% of trans adults had attempted suicide more than twice.^{xvi} This higher risk of suicide is related to experiences of discrimination, including stigma, transphobia and bullying. These negative experiences occur in many trans individuals' everyday lives, whether at home, work or school. This stigma and discrimination, and the fear of it happening, can make individuals in this situation feel unable to reach out for help when they need it. LGBT people are twice as high as heterosexual people to

attempt suicide and 1.5 times higher risk of depression and anxiety disorders and alcohol or other substance dependence^{xvii}.

- Promotion and implementation of Public Health England and Royal College of Nursing guidance for Nurses on suicide prevention strategies with trans young people^{xviii} and prevention suicide among lesbian, gay and bisexual young people^{xix}.
- Promotion of national and local resources for LGBT people
- Develop a workplace toolkit to help staff have informed conversations with LGBT people
- Develop a cross sector steering group to tackle inequalities and barriers to inclusion for the LGBT community.

Black and Minority Ethnic (BME) Groups

Nationally and locally there is little evidence on suicide risk in relation to Black and Minority Ethnic Groups. The coroner does not record this at registration of death so it is difficult to collect this data. Nationally they associate the prevalence of high levels of mental health for some BME groups as an indicator that they may be at higher risk of suicide although cultural issues may mitigate or exacerbate this. They point out that those who recently arrived in the country may need more support particularly for some groups such as asylum seekers or refugees. Locally we do not collect data on ethnicity (although we plan to try to obtain this for GP records in the future) but we do collect data on place of birth. Our records show that for 174 deaths currently recorded 27 had no record recorded and 22 were recorded with a place of birth outside England and 15 were outside the UK.

Children Looked After

Children looked after and young people leaving care are recognised as being at higher risk of self-harm and suicide than their peers. Swindon Borough Council has 340 children looked after (CLA) with approximately a third living outside Swindon Borough Council (August 2019). The Designated Nurse for children looked after is based in Swindon CCG and takes the strategic lead on improving the health outcomes for children looked after. There is a CLA Health Team, named nurse for children looked after and 2 specialist nurses. The emotional well-being of children looked after is screened using the Strength and Difficulties Questionnaire which is completed by foster carers, teachers and young people over 11 years of age and all those who have a high score, indicating emotional difficulties, are discussed at a monthly multi-disciplinary meeting. The CLA health team have close links with the local CAMHS service and there is a process in place for Swindon CCG to commission CAMHS services for children placed outside of Swindon who require a CAMHS service.

People experience socioeconomic disadvantage^{xx}

People who are socioeconomically disadvantaged or who live in areas of socioeconomic deprivation have an increased risk of suicidal behaviour. Features of socioeconomic disadvantage include low income, unmanageable debt, poor housing conditions, a lack of educational qualifications, unemployment and living in a socioeconomically deprived area.

Suicide risk increases during periods of economic recession, particularly when recessions are associated with a steep rise in unemployment, and this risk remains high when crises end, especially for individuals whose economic circumstances do not improve. Multiple and large employer closures

resulting in unemployment can increase stress in a local community, break down social connections and increase feelings of hopelessness and depression, all of which are recognised risk factors for suicidal behaviour.

The risk of suicidal behaviour is increased among those experiencing job insecurity and downsizing or those engaged in non-traditional work situations, such as part-time, irregular and short-term contracts with various employers.

Suicide rates are two to three times higher in the most deprived neighbourhoods compared to the most affluent and admissions to hospital following self-harm are two times higher in the most deprived neighbourhoods compared to the most affluent.

People with financial problems, including debt, gambling and those in receipt of employment benefits:

- Job Centre Plus are delivering a robust approach to suicide prevention, from training staff to be Mental Health First Aiders and exploring external training such as Assist, to running their own staff learning on mental health awareness and safeguarding and resilience. They are also rolling out Continuous Professional Development sessions on suicide and self-harm for all staff and reviewing and enhancing their internal procedures for handling declarations of intent to attempt suicide and self-harm. Every Jobcentre also has Disability Employment Advisers (DEA) that support frontline staff in working with those with health conditions and disabilities and who often assist during crisis situations.
- Ensure Samaritans and other community mental health and wellbeing services are linked in with the Job Centre to support their clients.
- Guidance on harmful gambling from the Local Government Association and PHE^{xxi} highlights that about half of people with gambling disorder (0.7% of the population aged 16 or over) have suicidal thoughts. Recommendations in this guidance for supporting those affected by harmful gambling should be explored.
- Ensure staff and volunteers in services accessed by socioeconomically disadvantaged individuals or groups are aware of the suicide risk and recognise, understand and respond appropriately to individuals who are in distress and may be suicidal

Those affected by the closure of Honda in Swindon

Recent announcements regarding the closure of Honda in 2021 may have a significant impact on the health and wellbeing of those directly and indirectly affected. A health and wellbeing working group has been established to mitigate some of the risks associated with such an economic change not just for Honda workers and their families but also employees and their families of businesses forming the supply chain to Honda.

8.2 Tailoring approaches to improve mental health in specific groups

The national suicide prevention strategy^{iv} recommends implementing tailored approaches to improving mental health in a range of groups with specific needs and characteristics that may lead to higher risk of suicide. These groups include:

- children and young people

- the lesbian, gay, bisexual and transgender (LGBT) community
- people from Black and Minority Ethnic (BME) groups
- people with long-term physical health conditions
- people with untreated depression
- Veterans
- users of drug and alcohol services
- perinatal mental health
- people in receipt of employment benefits.

The following recommendations are made to address mental health needs in vulnerable groups locally:

- Ensure community mental health and wellbeing service provision is inclusive and that vulnerable groups are specifically targeted with support by outreach workers.
- Work with primary care to upskill professionals on recognising and supporting those at risk of suicide.
- Ensure primary care professionals are aware of NICE guidance on depression^{xxiii}.
- Continue to work in partnership to prevent mental health crisis where possible and ensure effective response when crises do arise in line the Crisis Care Concordat throughout Swindon and the B&NES, SWINDON AND WILTSHIRE PARTNERSHIP. The Junction Café will provide additional out-of-hours crisis care support in Swindon from 2019 for those who are known to AWP and are referred by Police or AWP.

Children and young people:

- Ensure schools are aware of community mental health and wellbeing service provision, particularly for self-harm given the high rate of self-harm admissions among young people in Swindon.
- Review and promote self-harm resources available for children and young people, including the 'No harm done' resources, a series of films and toolkits that set out practical steps for young people, parents and health professionals to identify, understand and address self-harm that have been developed by the Department of Health and Social Care, the Royal College of Psychiatrists and third sector organisations.
- Roll out of the HarmLess tool developed by Oxford Health NHS Trust which provides guidance for those working with young people on having a conversation about self-harm, developing care plan and knowing when and where to refer/signpost. Ensure SENCo Champions, Designated teachers, Special Educational Needs and Disabilities Information and Advice Support Workers are specifically offered training
- Work with the Healthy Schools programme to have input into PSHE curriculum content around building mental resilience and to promote the use of MindEd web-based mental health educational resources for children and young people (as recommended in the national suicide prevention strategy).
- Implementation of the Trailblazer project which supports schools and colleges to improvement the mental health and wellbeing of pupils, students and staff.

- Continue to work with schools and other educational settings to promote awareness of and tackle stigma associated with mental health problems through training programmes for teachers and other staff, such as Connect 5, Mental Health First Aid (MHFA) and Emotional Literacy Support Assistant (ELSA) training.
 - Training should be guided by Health Education England's Self-Harm and Suicide Prevention Competence Framework for Community & Public Health.
- Ensure the needs of those with Special Educational Needs are considered in the roll out of the actions above. Work with Special Educational Needs Coordinators and educational psychologists in schools to:
 - raise awareness of mental health and well-being of all pupils, particularly those identified with SEN
 - develop whole school approaches that centre around emotional literacy and resilience of all members of the school community, following findings that link these factors with high self-harm / suicide rates
 - provide structured supervision to all staff supporting 'at risk' students to ensure their resilience and emotional vulnerability is safeguarded
 - provide training to all staff to ensure knowledge of risk factors is high
 - ensure all information moves with CLA, due to the high self-harm / suicide rates in this group of CYP; ensure this group is prioritised and advocated for in any individual work being carried out within schools. Currently staff often do not know histories of these CYP but they are complex and the individuals are this at more risk of self-harm and suicide than other groups
- Tackle bullying or discrimination particularly associated with an individual's special educational needs.
- Improve the access for children looked after to specialist support for emotional wellbeing by having a specialist mental health post within the Children Looked after team. Ensure those children looked after with high Strength and Difficulties Questionnaire (SDQ) scores have the appropriate intervention to improve their emotional health and wellbeing. Ensure all foster carers have self-harm and suicide prevention training. All commissioned services for CLA should be trained in suicide and self-harm prevention including accommodation provided for care leavers.

Older people

In Swindon there have been 14 deaths by suicide since 2008. Several factors related to aging can increase the risk of suicide such as social isolation, loneliness, bereavement and ill-health. These issues are highlighted in the Ageing Well JSNA and will be addressed in the ageing well strategy, currently being developed, entitled "Making a Good Life – a lifetime of healthy ageing". Safeguarding issues with regard to this cohort of the population also need to be considered in relation to suicide ideation and risk.

Users of drug and alcohol services:

- Work with Substance Misuse providers to ensure optimal awareness of mental health and suicide risk of clients, and ensure that staff refer individuals identified as being at risk to community-based or secondary mental health support as appropriate.
- As recommended above, ensure mental health service providers and substance misuse service providers are aware of and work in partnership on dual diagnosis issues.
- Implement and monitor actions taken to reduce the harm to children of alcohol-dependent parents Innovation project.

Those experiencing domestic abuse:

- Ensure training and support is offered for primary care and other frontline professional staff to improve identification and appropriate referral to support services of those experiencing domestic violence and abuse
- Work with domestic abuse support providers to ensure awareness of mental health and domestic abuse including coercive control and financial abuse and ensure clients are supported and have access to services
- Ensure mental health and domestic abuse service providers are aware of and work in partnership around domestic abuse issues

Perinatal mental health:

The B&NES, SWINDON AND WILTSHIRE PARTNERSHIP is developing a new, integrated approach to perinatal mental health services.

- Ensure peer-led perinatal mental health support is available in Swindon.
- Raise awareness among the public and health and social care professionals of the risk of perinatal mental health problems and how to recognise and identify such problems.
- Ensure those identified with perinatal mental health problems have access to relevant services.

Service Veterans

Evidence to date is that the overall rate of suicide is not higher for veterans than the general population; however, there is evidence that in male veterans aged less than 24, the rate is 2-3 times the national rate and especially in those who have served a short period in the military, those of lower ranks and those who have attained lower educational achievement. Evidence also shows that many veterans who die by suicide often have pre-service vulnerabilities^{xxii}.

- Ensure veterans are highlighted as a risk group in GP training
- As part of implementing the military covenant ensure accessible mental health treatment for military veterans.

People with long-term physical health conditions:

- Continue to follow NICE guidance (Clinical Guideline 91)^{xxiii} on depression in adults with a chronic physical health problem by offering group-based peer support to groups of patients with a shared chronic physical health problem through Lift Psychology.

People with Learning disabilities

National evidence shows that rates of suicide and attempted suicide are lower than the general population for those with severe learning disability but there is some evidence to suggest that the rates are higher in people with limited intellectual function (including mild or borderline learning disabilities)

- NICE Guidance NG 54 (2016) Mental health problems in people with learning disabilities: prevention, assessment and management should be reviewed and implemented as appropriate.
- Ensure those working with people with LD are aware of positive ways to promote mental health and resilience.

People with Autism

Those with autism have been recognised as being at higher risk of suicide than the general population (NICE 2018)^{xxiv}. Factors known to increase people's risk of suicide are more common in the autistic community, including social isolation, unemployment, trauma, abuse and other social and biological factors that increase the likelihood of mental health problems. In addition those with autism face other issues that make them more likely to consider ending their own lives. They may also find it more difficult to access services. Women with autism may be at particular risk.^{xxv}

- An autism JSNA and strategy should be developed to ensure that mental health needs of this group are addressed
- Increase awareness of positive mental health for those with autism
- Ensure those with autism have access to services

8.3 Reducing access to means of suicide

Action to reduce access to means of suicide has been shown to reduce deaths by suicide.

- Work closely with Police, including the British Transport Police, and other partners to identify frequently used areas, monitor and reduce suicide risk at these places such as multi-storey car parks, bridges and the railway line.
- Work with colleagues in planning to embed suicide prevention principles in the rewrite of Swindon's Local Plan.
- Work with the CCG and Local Pharmaceutical Committee to continue to reduce the means to suicide through prescribed medication. This will include inappropriate use of repeat prescribing and hoarding of medication.

8.4 Providing better information and support to those bereaved or affected by suicide

Providing support for people bereaved by suicide is a key objective of the national suicide prevention strategy. When compared with people bereaved through other causes, those bereaved by suicide are at an increased risk of suicide, psychiatric admission and depression. The risk of friends and relatives of people who die by suicide making a suicide attempt themselves is 1 in 10. Close family members, particularly parents and spouses or partners, are thought to be the most vulnerable groups following a suicide, but there are also risks for extended family, friends and colleagues.

Based on PHE guidance on providing local services to support those bereaved by suicide^{xxvi}, and a consultation carried out with members of the Survivors of Bereavement by Suicide (SOBS) peer support group in Swindon, the following recommendations are made:

- Explore the benefits of setting up a system of real-time suicide surveillance in Swindon. Real-time suicide surveillance involves information sharing between agencies, such as Police, the Coroner and Public Health, on suspected suicides in order to ensure timely identification and referral of people bereaved by suicide to support, as there may be considerable delays between a suicide occurring and the coroner completing the inquest and issuing an official verdict of suicide.
- Consider developing a pathway to provide care and support locally to those bereaved by suicide. An example pathway developed by PHE^{xxvi} is shown below, which highlights that, on first contact with the bereaved, they should be offered information, advice and guidance, including on local support available such as the SOBS support group and Cruse Bereavement Counselling. A more detailed version of this pathway can be found in the publication, “Support after a suicide: Developing and delivering local bereavement support services”, by the National Suicide Prevention Alliance.

Chart 23 PHE example pathway of care and support for those bereaved by suicide^{xxvi}

1 First contact		
• Police	• Funeral directors	• Self referral
• Coroner and coroner's office	• Primary care	
2 Referral to postvention support service		
Local service providers eg	• Outlook South West	• Cruse Bereavement Care / Samaritans
• If U Care Share Foundation	• Survivors of Bereavement by Suicide (SOBS)	
• AMPARO		
3 Face to face meeting		
• Trained and experienced team or individual	• Child death overview panel	
	• Local safeguarding boards	
4. Additional support		
• Primary care	• Youth groups	• Welfare support
• Mental health services	• Faith groups	• Housing providers/support
• Schools	• Funeral directors	
5. Feedback and evaluation		
• All partners in the pathway	• Public Health England (for resources on a range of relevant issues)	
• Members of the community, including those bereaved		

- Consider commissioning specialist suicide bereavement counselling. The consultation carried out with SOBS members in Swindon highlighted that many of them felt that counselling they had received wasn't fit for purpose.

- Develop and distribute post-vention (suicide bereavement support) guidance to schools. Ensure this guidance includes specific guidance for those with special educational needs.
- The implementation of national campaigns such as Time to Change to raise awareness of and tackle the stigma around mental health problems, as recommended above, will also contribute to tackling stigma around suicide and may make it easier for people to seek help following bereavement.
- Ensure peer support group continues to be available in Swindon.

8.5 Supporting the media in delivering sensitive approaches to suicide and suicidal behaviour

Evidence suggests that inappropriate reporting of suicide may lead to 'copycat' behaviour among vulnerable groups, particularly young people.

- Continue to maintain strong links with local media on suicide prevention, and ensure local media are aware of the guidance published by the Samaritans^{xxvii} on responsible media reporting of suicide.
- Work with local media to promote mental health awareness as part of national campaigns, such as Time to Change, Suicide Prevention Day and Mental Health Awareness Week.

8.6 Supporting research, data collection and monitoring

- Review the local suicide audit system to ensure all relevant data is being collected from all relevant agencies.
- As recommended above, explore the benefits of setting up a system of real-time suicide surveillance in Swindon in order to ensure timely identification and referral of people bereaved by suicide to support.
- As recommended above, work with partners including the Police and British Transport Police to monitor suicide risk at high frequency locations.
- Continue to support PHE-led self-harm research.

8.7 Reducing rates of self-harm as a key indicator of suicide risk

Previous self-harm, including attempted suicide, is the single strongest predictor of suicide. Self-harm admissions to hospital are a particular problem in Swindon - rates of hospital admissions for self-harm are consistently higher than those seen regionally or nationally, especially among young people aged 10-24 years.

- Continue the work of the multi-agency Task and Finish Group on reducing self-harm among children and young people. The work of this group contributes to sharing learning on and standardising approaches to self-harm assessment and interventions across agencies and the BSW Partnership. The group should look to:
 - Roll out the Harmless tool developed by Oxford Health throughout Swindon, including to foster workers, looked after children (LAC), schools, colleges, GPs, school nurses, and third sector youth providers.

- Review websites and apps available to share with schools and other professionals.
- Develop post-vention guidance for schools.
- Promote the Health Education England Self harm and Suicide Prevention Competency Framework to organisations in Swindon.
- Maintain or increase provision of community self-harm support, ensuring that:
 - Young people are specifically targeted;
 - Provision complies with NICE Clinical Guideline 133^{xxviii} on the long-term management of self-harm in people aged over 8 years old. This guideline emphasises the importance of:
 - Education of health and social care professionals about the stigma and discrimination usually associated with self-harm and the need to avoid judgemental attitudes, and on when and how the Mental Health Act (1983; amended 1995 and 2007) can be used to treat the physical consequences of self-harm.
 - Managing the endings of services, treatments or relationships and supporting transitions between services, through a process of planning with the service user.
 - Encouraging primary care professionals to refer people with a history and risk of self-harm to community mental health and wellbeing services or to CAMHS if they are under 18, and to monitor the physical health of these patients.
 - Ensuring community mental health and wellbeing services offer an integrated and comprehensive psychosocial assessment of needs, including skills, coping strategies, mental health problems and physical health problems, and risks to understand and engage people who self-harm and to initiate a therapeutic relationship. Needs assessments for children and young people should include a full assessment of the child's family, social situation, and child protection issues.
 - Ensuring community mental health and wellbeing services work with the person who self-harms and their family (if agreed with the person) to develop a care plan and a risk management plan, based on the psychosocial needs assessment.
 - The guideline also recommends that mental health services, including community services, consider offering 3 to 12 sessions of a psychological intervention that is specifically structured for people who self-harm, with the aim of reducing self-harm. The intervention should be tailored to individual need, and could include cognitive-behavioural, psychodynamic or problem-solving elements.
 - Provision complies with Health Education England's Self-Harm and Suicide Prevention Competence Framework for Community & Public Health.

9. Appendix 1:



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Swindon Suicide and Self-Harm Prevention Action Plan 2019 – 2023 V7 (Draft)

Objective	Action	Owner	Date
1. Reduce the risk of Suicide in high risk groups	<p>1.1. Improving help seeking behaviour in men</p> <p>1.1.1.Campaign to encourage men to talk about their mental health</p> <p>1.1.2.Work with Substance Misuse providers to ensure optimal awareness of mental health and suicide risk of clients. Ensure that Dual Diagnosis clients (substance misuse and mental health are supported and have access to services)</p> <p>1.1.3.Recommissioning of community based mental wellbeing service will take place in January 2020- providers will have to include a focus on engaging men in their KPI's.</p> <p>1.1.4.Continue to provide Men's stress psycho-education course. The course is run once a quarter and teaches techniques to manage stress an also encourages men to open up about their emotions. Promote the course more widely.</p>	<p>Mental Health Co-ordinator SBC</p> <p>Substance Misuse Commissioner</p> <p>Senior Public Health Manager</p> <p>Head of service Lift Psychology</p>	<p>May 19 Complete</p> <p>May 2020</p> <p>January 2020</p> <p>On going</p>
	<p>1.2. Financial problems , debt, gambling and those in receipt of benefits</p> <p>1.2.1.Joint partnership work to devise best practice guide for banks in Swindon regarding managing early signs and</p>	<p>Mental Health Co-ordinator</p>	<p>April 2020</p>

	debt and mental health issues. Raising awareness of local support services to banking staff.	SBC, AWP, Metro Bank, CAB, Credit union, SBC housing and Samaritans.	
	1.2.2.Campaign on Suicide Prevention Day 2019 to raise awareness around Debt and Mental Health to the local community.	Time to change/Mental health co-ordinator	September 2019
	1.2.3. Explore the recommendations within the LGA/PHE guidance on tackling gambling related harm (2018)	Senior Substance Misuse Commissioner	September 2020
	1.2.4.Ensure staff who support those who are most socioeconomically disadvantages are aware of the suicide risk and know how to respond.	Mental Health Co-ordinator	September 2021
	1.2.5.Rolling our Mental Health First Aid and other suicide prevention training such as ASSIT to DWP staff	DWP, Service Lead	September 2020
	1.2.6.Continue links between DWP and support offered by the Samaritans	DWP Service Lead and Samaritans	On Going
	1.2.7.Link with DWP around closure of Honda with regard to recognising suicide risk	DWP, District Operations Manager and Mental health Co-ordinator	September 2019 September 2023
	1.3. Improve community response to working with those in the LGBT community		
	1.3.1.Joint partnership work between SBC sexual health, mental health, domestic abuse as well as local community sector groups. Raising the profile of best practise when working with the LGBT community to engage them in support. Consider implications with regard to culture, faith and social beliefs.	Mental Health co-ordinator SBC, Out of the Can, Swindon Mind.	January 20

	<p>1.3.2.LGBT principles produced to share with wider community around best practice with LGBT community.</p> <p>1.3.3.Promotion and implementation of the PHE and RCN guidance for nurses on suicide prevention strategies with trans young people and among lesbian, gay and bisexual young people.</p>	<p>Mental Health co-ordinator SBC, Out of the Can, Swindon Mind.</p> <p>Mental Health Co-ordinator and Senior Public Health Manager Children and Young People</p>	<p>January 20</p> <p>Sept 2020</p>
	<p>1.4. Housing and homelessness</p> <p>1.4.1.Ensure those supporting people who are homeless or at risk of homelessness have access to and receive training on mental health awareness. This should include links with 3rd sector charities and voluntary groups.</p> <p>1.4.2.Ensure those who are homeless have access to mental health services</p> <p>1.4.3.Ensure AWP have a representative on the homeless panel.</p> <p>1.4.4.Recommissioning of community based mental wellbeing service will have a specific provision for those that are under local homelessness service.</p>	<p>Rough Sleeper Project Co-ordinator SBC, housing providers and homeless outreach workers</p> <p>Mental Health Commissioner CCG, SBC, AWP</p> <p>AWP service Manager AWP/SBC</p> <p>Senior Public Health Manager SBC/CCG</p>	<p>Jan 2019</p> <p>Jan 2020</p> <p>Ongoing</p> <p>Jan 20</p>

	<p>1.5. People with a history of self-harm</p> <p>1.5.1.Recommissioning of community based mental wellbeing service will have specific provision for those that have a history of self-harm.</p> <p>1.5.2.See section on self-harm below (7.0)</p>	<p>Senior Public Health Manager SBC/CCG</p> <p>SBC PH, CAMHS, TAMHS, SBC Education</p>	<p>Jan 2020</p>
	<p>1.6. Specific occupational groups, such as doctors, nurses, veterinary workers, farmers and agricultural workers.</p> <p>1.6.1. Targeted work to be established around veterinarians to raise awareness of suicide in this profession.</p> <p>1.6.2.Men's mental health campaign to be rolled out to GP practices and local veterinarians.</p> <p>1.6.3.Establish links with the construction industry to raise awareness of the risk and opportunities to prevention suicide using the Mindful Employer Network</p>	<p>Mental Health co-ordinator</p> <p>Mental Health co-ordinator SBC, Vets, Practice managers in GP practices.</p> <p>Mental Health co-ordinator</p>	<p>September 20</p>
	<p>1.7. People with a history of mental health problems</p> <p>1.7.1. Continue to work closely with CCG, and secondary care services to monitor and support suicide prevention within secondary care services – including inpatient settings by the implementation of secondary care</p>	<p>Mental Health commissioner CCG/ Senior Public Health Co-ordinator</p>	

	<p>suicide prevention strategies</p> <p>1.7.2.Ensure those with dual diagnosis substance misuse and mental health are identified and have access to support</p> <p>1.7.3.Continue joint working between Lift Psychology and Primary Care Liaison service to support service users with appropriate referrals and treatment.</p> <p>1.7.4.To continue with and review the emotional regulation group work currently provided by Lift Psychology</p> <p>1.7.5.Review links between S136 attendances by the police and subsequent Suicide</p> <p>1.7.6.To commission and implement a crisis café model to support those experiencing a mental health crisis initially for those under care of mental health service but with potential to expand .This is a two year pilot.</p> <p>1.7.7.LIFT Psychology to continue with the Employment</p>	<p>Suicide prevention leads at AWP and Oxford Health.</p> <p>SCCG, Oxford Health NHS Trust, AWP, SBC Public Health Substance Misuse Commissioner SBC, SCCG, SBC PH, Oxford Health, U-turn, Turning Point, AWP</p> <p>Head of Service LIFT/PCLS service manager</p> <p>Head of Service LIFT Psychology AWP LIFT</p> <p>Partnership Sergeant Wiltshire Police, SBC Public health and Wiltshire Steering Group</p> <p>Mental Health Commissioner CCG SCCG, SBC</p>	
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	<p>Support Project (Ends March 2020) with a small team of Employment Advisors to support individuals who present with stress at work; are signed off work; or supporting unemployed people to return to work.</p> <p>1.7.8.To improve and develop personality disorder pathway to include structured clinical management</p> <p>1.7.9.As part of implementing the military covenant ensure accessible mental health treatment for military veterans.</p>	<p>LIFT Psychology Head of Service</p> <p>Mental Health Commissioner BSW Mental Health Commissioner CCG Head of Service AWP.</p>	
	<p>1.8. People in contact with the criminal justice system</p> <p>1.8.1.Review the implementation of NICE guidance with regard to supporting those in the criminal justice setting.</p> <p>1.8.2.Continue to raise awareness of mental health issues among staff within the policy custody unit, the local probation service, substance misuse services and homeless services and encourage them to be vigilant for signs of suicide risk among clients/offender</p> <p>1.8.3. Target community mental health and wellbeing</p>	<p>Interventions Manager Working Links/Senior Public Health Manager</p> <p>Probation, NPS and SBC Partnership sergeant Wiltshire Police</p> <p>Senior Public Health</p>	<p>Dec 20</p> <p>On Going</p> <p>September 2020</p>

	support to those most at risk including those on probation	Manager, CRC, NPS,	
	1.9. People with gambling problems 1.9.1. Commission and implement a service for those experiencing problems with gambling with a specific focus on identified vulnerable groups.	ARA and Substance Misuse Commissioner SBC/Gambling Commission/Recovery for All	Sept 19
	1.10. People with long term conditions 1.10.1. Continue to provide and develop services to support those with long term conditions with group and 1:1 intervention for their mental health – to include pain and fibromyalgia	Head of Service LIFT/Health Communities Manager Lift Psychology/Community Navigators	On going
	1.11. Children Looked after (See section 2 below) 1.12. Older people please see the Swindon Ageing well strategy, Making a good life (currently under development)		
2. Tailoring approaches to improve mental health in specific groups	2.1 Recommissioning of community based mental wellbeing service will take place in January 2020 2.1.1 This will include provision specifically for high risk groups such as; homelessness, transitions (16- 25 years), men, lower level dual diagnosis, those stepping down from AWP. 2.1.2 This will include expectations around the delivery of inclusive service to support those with LD, those from a BME background and those from the LGBT community. 2.1.3 This will include specific services for those who are self-	Senior Public Health Manager SBC/Mental Health Commissioner CCG	January 20

	<p>harming and those bereaved by suicide as well as those at risk of Post Natal Depression.</p> <p>2.1.4 This will include educational workshops and campaigning which highlight the link between mental illness/ risk of suicide with certain groups; i.e. LD, LGBT.</p> <p>2.1.5 This will include providing support for those bereaved by suicide</p>	SBC /CCG	
	<p>2.2 Support local providers to access mental health training.</p> <p>2.2.1 Recommissioning of community based mental wellbeing service will include ASSIST and MHFA training as well as mental wellbeing awareness training such as Connect 5 to support local providers.</p> <p>2.2.2 Ensure GP practices have access to training on suicide prevention and self harm</p> <p>2.2.3 Deliver workshop to GPs through the academy on suicide and self-harm</p>	<p>Mental Health Co-ordinator SBC</p> <p>Deputy Head of Service LIFT Psychology</p> <p>Deputy Head of Service LIFT Psychology, Oxford Health, Mental Health Commissioner CCG, Senior Public Health Manager</p>	<p>Jan 20</p> <p>Ongoing</p> <p>October 19</p>
	<p>2.3 Time to Change Swindon</p> <p>2.3.1 Raise general awareness of mental wellbeing/ suicide prevention in certain groups; LGBT, Men, LD, perinatal</p>	SBC and TTG Steering Group	June 2020

	<p>2.4 Primary care services</p> <p>2.4.1 Improve confidence in those delivering primary care services to identify and support those with suicidal ideation. To include ongoing CPD and support for Psychology Practitioners at LIFT.</p> <p>2.4.2 Ensure primary care professionals are aware of NICE guidance on depression</p> <p>2.4.3 Continue to implement the Crisis care concordat to improve crisis care and prevent crisis ensuring Swindon's engagement in Avon Somerset and Wiltshire Crisis Care Concordat Group</p>	<p>Head of Service LIFT/AWP/Oxford Health/SBC PH/SCCG</p> <p>Mental Health Commissioner CCG SCCG</p> <p>Mental Health Commissioner CCG CCG, SBC and BSW STP Concordat Group</p>	<p>October 19</p> <p>Dec 20</p> <p>On going</p>
	<p>Children and Young People (self-harm prevention under section 7)</p> <p>2.5 Ensure Specialist perinatal mental health service is embedded in the Perinatal mental health pathway</p> <p>2.6 Improve access to specialist perinatal mental health services</p> <p>2.7 Ensure Schools are aware of community mental health and wellbeing service provision for self-harm support</p> <p>2.8 Improve the PSHE curriculum and delivery around mental health and wellbeing. Promote Mind Ed web-based resources</p>	<p>Perinatal Mental Health Steering Group</p> <p>Mental Health Commissioner/Head of Service AWP</p> <p>New service provider</p> <p>Healthy Schools Advisor</p>	<p>January 2020</p> <p>September 2020</p> <p>September 2020</p> <p>September 2020</p>

	2.9 Work with schools and other educational and youth settings to promote awareness of and tackle stigma associated with mental health problems through training. Training should be guided by the HEE self-harm and suicide prevention competency framework for community and Public Health.	Mental health co-ordinator and Health Schools Advisor	September 2021
	2.10 Ensure the needs of those with SEN are considered in the roll out of the above actions and those in section 7. Work with SENDCos and Educational Psychologists in Schools to raise awareness of mental health and wellbeing of those with SEND particularly in relation to dyslexia, autism and related conditions.	Strategic Commissioner for SEND/Children and Young People's Programme Manager	September 2021
	2.11 Tackling bullying or discrimination associated with SEN	SEN Advisor	September 2021
	2.12 Improve the access for children looked after to specialist support for emotional wellbeing by having a specialist mental health post with the Children Looked after team	Designated Nurse CLA, Named Nurse for CLA; Service Manager Permanency	September 2020
	2.13 Ensure those CLA with high SDQs have the appropriate intervention to improve their emotional health and wellbeing	Designated Nurse CLA (CCG)	September 2020
	2.14 Ensure all foster carers have self-harm and suicide prevention training	Named Nurse and Manager Foster Carers	September 2020
	2.15 All commissioned service for CLA should be trained in suicide and self-harm prevention including providers of accommodation for care leavers. They should be aware of and implement the HEE self-harm and suicide prevention competency framework for community and Public Health. (To include Children and Young People care home providers.)	Manager for Permanency Designated nurse for CLA	September 2021

	Dual diagnosis Substance Misuse and mental health		
	2.16 Raise awareness of mental health and suicide risk amongst substance misuse workforce	Mental Health Co-ordinator/ Senior Substance Misuse commissioner (2.16 – 2018)	June 2021
	2.17 Develop dual diagnosis pathways between mental health and substance misuse services.		
	2.18 Implement and monitor the actions taken to reduce the harm to children and alcohol-dependent parents as part of the innovation project.		
	Those experiencing Domestic Abuse		
	2.19 Ensure training and support is offered for primary care and other frontline professional staff to improve identification and appropriate referral to support service of those experience DV and DA.	Domestic Abuse Co-ordinator	September 2021
	2.20 Work with Domestic Abuse support providers to ensure awareness of mental health and the HEE self-harm and suicide prevention competency framework for community and Public Health.	Domestic Abuse Co-ordinator	September 2021
	2.21 Ensure mental health and domestic abuse service providers are aware of and work in partnership around domestic abuses issues.	Domestic Abuse Co-ordinator	September 2021
	Those with Long-term Physical health conditions		
	2.22 Continue to implement NICE guidance (CG91) on depression		

	<p>in adults with chronic physical health problems buy offering group-based peer support to groups of patients with shared chronic physical health conditions through LIFT psychology</p> <p>Those with learning disabilities</p> <p>2.23 NICE Guidance NG 54 (2016) Mental health problems in learning disabilities; prevention, assessment and management should be reviewed and implemented as appropriate</p> <p>2.24 Ensure those working with people with learning disability are aware of positive ways to promote mental health and resilience.</p> <p>Those with Autism</p> <p>2.25 Ensure Mental health needs are addressed in the Autism JSNA and Strategy under development</p> <p>2.26 Increase awareness of positive mental health for those with autism</p> <p>2.27 Ensure those with autism have access to mental health services</p>	<p>Mental Health commissioner CCG and Service Lead for LIFT.</p> <p>Head of transitions</p> <p>Head of transitions</p> <p>Head of transitions (holding)</p> <p>Head of transitions (Holding)</p> <p>Head of transitions (Holding)</p>	On going
3. Reducing access to means of suicide	<p>3.1 Work with colleagues in planning to embed principled in the rewrite of the local plan</p> <p>3.2 Continue to monitor the method of suicide through the local audit for trends.</p>	<p>SBC PH and Planning</p> <p>Senior Public Health Manager</p>	<p>Dec 19</p> <p>On Going</p>

	3.3 Work with the CCG and local pharmaceutical committee to continue to reduce the means to suicide through prescribed medication. This will include inappropriate use of repeat prescribing and hording of medication.	Prescribing Lead CCG LPC	June 2021
	3.4 Work with British Transport to continue to monitor incidents on the railways	Sergeant BTP/Senior Public Health Manager	On going
	3.5 Wiltshire Police to continue to provide information to public health on incidents in car parks, bridges or other public places with regard to suicide.	Partnership Sergeant Wiltshire Police Wiltshire Police and SBC PH and Car Parks	On going
	3.6 To ensure Samaritans signs up in car parks	Parking Management & Enforcement Highways and Transport Samaritans, SBC Car Parks, SBC PH	On going
4. Providing better information and support to those bereaved or affected by suicide.	<p>4.1 Recommissioning of community based mental wellbeing service will take place in January 2020 and will include a specific service for those bereaved by suicide.</p> <p>4.2 Explore the benefits of real time surveillance</p> <p>4.3 Provide support for those bereaved by suicide through the local SOBS group</p>	Senior Public Health Manager SBC / SCCG/ Third Sector SOBS lead; Partnership Sergeant Wiltshire Police, Mental Health Co-ordinator Police, Primary Care, Community services	<p>Jan 2020</p> <p>January 2022</p> <p>On going</p>

	4.4 Promote Help is at Hand and local community support available in Swindon to relevant parties		April 2020
5. Supporting the media in delivering sensitive approaches to suicide and suicidal behaviour	<p>5.1 Time to Change Swindon- Swindon have been successful in their application to becoming a Time to Change Hub and will work in partnership with local media to promote mental health messages under the Time to Change banner, supporting appropriateness, consistency and professionalism.</p> <p>5.2 Suicide Prevention Day 2019- this will focus on message around debt and mental health awareness. Local media outlets and organisations like the Samaritans will work in partnership to ensure appropriate messaging. (Promote bereavement support)</p> <p>5.3 Mental Health Awareness Week 2019- This will have a focus on Men through the launch of the local men's mental health campaign. Local media will be engaged to support messaging in an appropriate way during this week.</p> <p>5.4 Continue to maintain strong links with local media on suicide prevention and ensure local media are aware of the Samaritans guidance of responsible media reporting of suicide.</p>	<p>Time to Change Steering Group.</p> <p>Mental Health Co-ordinator SBC, Samaritans, CAB.</p> <p>Time to Change Steering Group Comms</p>	<p>June 19</p> <p>September 19</p> <p>May 19</p> <p>Ongoing</p>
6. Supporting research, data collection and monitoring	<p>6.1 Continue to monitor deaths by suicide through the established audit system</p> <p>6.2 Improve links with the Child Death Overview Panel with regard to suicides for those under 18yrs</p> <p>6.3 Improved joint working between CCG, AWP/Oxford Health to review deaths by suicide of those known to mental health services</p> <p>6.4 Review the Swindon Audit process to explore opportunities include additional partners such as probation, safeguarding and Drug Related Deaths.</p> <p>6.5 Continue to support regional PHE led research on self-harm</p>	<p>SBC Public Health</p> <p>SBC Public Health</p> <p>Public Health, CCG, AWP/Oxford Health</p> <p>Senior Public Health Manager</p>	<p>On going</p> <p>December 19</p> <p>March 2020</p> <p>September 20</p>

	admissions to hospitals	PHE, SBC	April 20
	6.6 Consider the benefits of real-time surveillance with Wiltshire CC and Wiltshire Police	Senior Public Health Manager SBC, SBC, WCC, Wiltshire Police	April 20
	6.7 Review and promote the Information sharing and suicide prevention consensus statement published led by the Department for Health 2014	All Partners	September 2020
	6.8 Improve recording of ethnicity on the suicide audit database	Senior Public Health Manager/Suicide Prevention Lead WCC	April 2020
7. Reducing rates of self-harm as a key indicator of suicide risk	7.1 Recommissioning of community based mental wellbeing service will have specific provision for those that have a history of self-harm.	Senior Public Health Manager SBC, CCG	January 2020
	7.2 Develop a consistent approach to self-harm risk assessment and interventions across CAMHS and throughout TAMHS	Clinical Team Manager CAMHS and Senior TaMHS Clinical Practitioner	June 19 ongoing July 19
	7.3 Review and recommend websites and apps which are helpful and supportive for young people to access with a focus on staying safe and prevention self-harm		
	7.4 Roll out Harmless toolkit to support those working with young people to have helpful conversations about self-harm accessing risk and developing care plans and referral if required. Ensure SENCo Champions, designated teachers, special educational Needs and disabilities Information and Advice Support Workers are specifically offered training.	Mental Health Co-ordinator, Service Manager CAMHS, Strategic Commission SEND, SEN Advisor, Designated Nurse CLA, SENDIASS Manager	From June 19

	7.5 Explore the development of pathways between A&E and schools/school nurses regarding self-harm attendance at GWH.	Principle officer health and wellbeing, GWH, and Oxford Health Service Manager	June 2020
	7.6 Develop guidance for schools on post-vention support following a suicide within the school	Lead safeguarding adviser education	December 2019
	7.7 Promotion of the HEE Self-Harm Competencies to make sure professionals working with those who self-harm are aware of and implement good practice	GWH/Oxford Health/Schools nurses Education and Public Health, CCG Commissioners	September 2020
	7.8 Through Time to Change explore options for a Self-Harm and suicide awareness campaign	Time to Change Group and Public Health	September/October 2019
	7.9 Review the implementation of NICE clinical guideline 133 on the long term management of self-harm in people aged over 8 years old.		