



LONDON BOROUGH OF ENFIELD

**AGENDA FOR THE COUNCIL MEETING
TO BE HELD ON WEDNESDAY, 17TH
NOVEMBER, 2021 AT 7.00 PM**

**THE WORSHIPFUL THE MAYOR
AND COUNCILLORS OF THE
LONDON BOROUGH OF ENFIELD**

Please Reply to: Clare Bryant
Phone: 020 8132 3159
E-mail: Clare.bryant@enfield.gov.uk
My Ref:
Date: 12 November 2021

Dear Councillor,

You are summoned to attend the meeting of the Council of the London Borough of Enfield to be held at the Civic Centre, Silver Street, Enfield on Wednesday, 17th November, 2021 at 7.00 pm for the purpose of transacting the business set out below.

Yours sincerely

Jeremy Chambers

Director Law & Governance

- 1. THE MAYOR'S CHAPLAIN TO GIVE A BLESSING**
- 2. MAYOR'S ANNOUNCEMENTS IN CONNECTION WITH THE ORDINARY BUSINESS OF THE COUNCIL**
- 3. MINUTES OF THE PREVIOUS MEETING** (Pages 1 - 8)
- 4. DECLARATIONS OF INTERESTS**

Members of the Council are invited to identify any disclosable pecuniary, other pecuniary or non pecuniary interests relating to items on the agenda.

- 5. APOLOGIES**
- 6. TREASURY MANAGEMENT MID YEAR REPORT** (Pages 9 - 36)

To receive the report of Executive Director of Resources on the Treasury Management Mid Year report.

The Council is asked to note the report and approve the 2021/22 Mid Year Treasury Management position.

7. POLLING DISTRICT AND POLLING PLACE REVIEW - RECOMMENDATIONS (Pages 37 - 154)

To receive a report of the Chief Executive on the Polling District and Polling Place Review.

The Council is asked to agree the recommendations set out in paragraph 2 of the report.

8. SAFEGUARDING ENFIELD ANNUAL REPORT 2020/21 (Pages 155 - 262)

To receive the report of the Executive Director of People on the Safeguarding Enfield Annual Report 2020/21.

The Council is asked to note the successes and challenges that have arisen from safeguarding activity in the period 2020-21.

9. GAMBLING ACT 2005 - GAMBLING POLICY & CASINO RESOLUTION (Pages 263 - 376)

To receive the report of the Executive Director of Place on the Gambling Act 2005 – Gambling Policy & Casino Resolution.

The Council is asked to agree the Sixth Edition Gambling Policy, and continue the resolution to prevent casino operators from locating within the borough.

10. COUNCILLOR QUESTION TIME

Members are asked to note the questions submitted for written response. Responses to the questions will be published the day before the meeting.

11. MOTIONS

11.1 MOTION TO THE COUNCIL IN THE NAME OF COUNCILLOR AKSANOGLU

Cladding

Enfield Council Supports the End Our Cladding Scandal campaign and calls for the government to provide active remedies to resolve the cladding scandal in the country which is affecting leaseholders and residents in Enfield.

The Council notes:

- The Government has made it a requirement to remove all cladding that presents a fire risk and remediation of unsafe wall systems on the walls of existing residential buildings of any height after the Grenfell disaster. This is affecting not only buildings with the ACM Cladding

used on Greenfell, but many other buildings incorporating materials which could be flammable – including balconies and wooden panels.

- The Royal Institution of Chartered Surveyors (RICS) and the UK Council of Mortgage Lenders agreed an industry-standard External Wall System fire review process, which takes place through a EWS1 form.
- An EWS1 form shows that the building is “safe”. Lenders often value properties at £0. Many leaseholders are unable to secure a mortgage over their properties. leaseholders are trapped in their ‘unsafe’ homes unless they are able to pay the huge sums of money often required to address the fire safety issues highlighted in the EWS1 form. Many people face bankruptcy by this even before remediation bills can be passed on.
- It is estimated that at the current rate it will take over 150 years to complete the remediation work required to the number of known unsafe properties over 18 metres.
- Whilst the Government has provided some funding to support the remediation of unsafe cladding, this only covers a bare minimum number of buildings requiring remediation works.
- For buildings under 18 meters tall, the Government has provided no funding at all as a result of this funding shortfall the costs of remediation works are being passed on to leaseholders, who are blameless for this situation and bought their properties in good faith.
- There are many Enfield residents affected by this issue including Prowse Court in Edmonton and many leaseholders are facing high bills to rectify the issue.

Council also notes:

That giving leaseholders loans to pay for the repairs, whatever the terms, is not an acceptable solution, as this is placing the long-term financial burden on them.

Council calls for:

- The council supports the end our Cladding Scandal Campaign, which makes the following 10 demands:
 - 1) The government must lead an urgent national effort to remove all dangerous cladding from buildings by June 2022.
 - 2) The Building Safety Fund must cover all buildings, regardless of height, and a range of internal and external fire safety defects, not just cladding.

- 3) The government should provide the money up front and then seek to recover it from any responsible parties or via a temporary levy on development.
- 4) Social housing providers must have full and equal access to the fund.
- 5) The government must compel building owners or managers to be honest with residents about fire safety defects.
- 6) The government should cover the cost of interim safety measures.
- 7) The government should act as an insurer of last resort and underwrite insurance where premiums have soared.
- 8) A fairer, faster process is needed to replace the EWS form and funding is necessary to ensure all buildings requiring a form are surveyed within 12 months.
- 9) Mental health support must be offered to affected residents.
- 10) Protecting residents from historic and future costs must be a key commitment of new building safety legislation.

The Council calls for the Government to impose adequate funding to cover the costs of safety measures.

11.2 MOTION TO THE COUNCIL IN THE NAME OF COUNCILLOR MAGUIRE

Sewage Discharges

Enfield Council is appalled that the Government has refused to take seriously the threat to the environment and to public health by the discharge of untreated sewage into our rivers and seas.

The Government must match its pious rhetoric about protecting the planet with firm action to force the privatised water companies to act responsibly in the public interest.

11.3 MOTION TO THE COUNCIL IN THE NAME OF COUNCILLOR YUSUF

Members of Parliament (the cross-party Health and Social Care Committee and the Science and Technology Committee) published a report in October 2021 which revealed that the government's failings of handling of the covid-19 pandemic. The government's dithering and delaying resulted in the spread of coronavirus and may have caused many thousands of unnecessary deaths.

Specific criticism of the government included:

- That it was too slow to implement a lockdown.
- The pursuit of 'herd immunity'.
- Stopping community testing in March 2020.
- An inadequate test-and-trace system.

- Patients being sent from hospitals to care homes resulting in thousands of unnecessary deaths.

The Government continues to refuse to bring forward a public enquiry and has stated it will begin sometime in 2022.

Enfield Council calls on the Government to urgently bring forward the inquiry so that lessons can be urgent learned.

Enfield Council also resolves to prepare its own response to a future Covid inquiry.

11.4 MOTION TO THE COUNCIL IN THE NAME OF COUNCILLOR BARNES

Climate Change

Recently the Government hosted COP26 in Glasgow but in the preceding week the Chancellor presented a budget where he did not use the word 'climate' once. Instead he reduced air passenger duty, which will lead to over 400,000 extra passenger journeys a year, and he axed a planned fuel duty rise making it cheaper to drive at a time when we need to encourage people out of their cars if they are able.

We are also close to seeing the government approve a new oil and gas project in the North Sea, which will help deepen the climate crisis for decades to come, while the Prime Minister refuses to intervene to stop a planned coal mine in Cumbria which will produce one of the dirtiest fossil fuels currently driving up global temperatures.

The recent Net Zero Strategy holds promise, and we welcome the government funding measures such as low traffic neighbourhoods and cycle lanes across the UK, but it is nowhere near enough at this critical juncture as we continue to see the large financial figures needed for significant climate action delayed year after year.

Therefore, Enfield Council calls on the Government to tackle climate change as an absolute priority by immediately releasing all necessary funds to local authorities so they can become the vanguard of an effective and permanent programme fighting climate change across the UK and beyond.

11.5 MOTION TO THE COUNCIL IN THE NAME OF COUNCILLOR MAGUIRE

This Council is shocked, disgusted and saddened at the blatant attempt by the Government to destroy the system of standards in public life. By whipping Conservative MPs in the Owen Paterson case to set aside the findings of the Committee on Standards report, the Government has shown

complete contempt for Parliamentary democracy and decency.

This is the latest, and most cynical, act of this Government to trample all over the rules that govern Parliamentary accountability to ensure one of its own MPs would get away with breaking the rules. It was a clear act of corruption. It sets an appalling example to young people and to the country and inflicts huge damage on our reputation worldwide.

This Council condemns the actions of this Government and calls on the Oppositions to support our call to all MPs of all political parties to resist attempts to undermine Parliamentary standards.

11.6 MOTION TO THE COUNCIL IN THE NAME OF COUNCILLOR MARIA ALEXANDROU

Cervical Cancer Screening

Cervical screening is a way for women to protect themselves from cancer. The sad reality is that fewer women are now having cervical screening. Last year 1.3m women didn't attend NHS screenings. There are 3,200 new cases of cervical cancer every year and of those 870 women die from it.

According to CANCER RESEARCH UK 99.8% of cases are preventable. When Jade Goody fought her cancer battle, nearly 80% of women went for smear tests. 10 years later, only 72% of women go. If this rate falls any lower, the rise in deaths will shoot up. In the case of Jade Goody, she ignored letters about her abnormal cells. She needed to go to hospital for surgery to remove those abnormal cells, surgery which most probably would have saved her life.

Many young women in their 20s and 30s are dying from cervical cancer and the tragedy is they are leaving behind their partners and young children. We need to encourage everyone to look after their health and have regular check-ups.

Enfield Council therefore agrees to work together with other agencies for a local campaign on cervical cancer awareness and encourage women to attend that important screening test. It only takes 5 minutes at the doctor's surgery and this test can save your life.

11.7 MOTION TO THE COUNCIL IN THE NAME OF COUNCILLOR JOANNE LABAN

This Council mourns the loss of Sir David Amess MP, who was killed performing his constituency duties on 15 October 2021.

This Council recalls the tragic loss of Jo Cox MP in 2016 and the attack on Stephen Timms MP in 2010. The death of Sir David represents the third such attack on a British parliamentarian in a little over a decade.

This Council restates the power of democratic politics to make a positive difference to people's lives and recognises that politicians of all parties are overwhelmingly dedicated, decent people discharging their democratic duties as best they can.

This Council asks that the Group Leaders collectively convey our condolences on the loss of Sir David and write to the Leaders of all political parties in Westminster to support measures that would see politicians at tiers of government kept safe and secure so that they continue working hard on behalf of their constituents.

11.8 MOTION TO THE COUNCIL IN THE NAME OF COUNCILLOR EDWARD SMITH

This Council supports the findings in the recent letter to all councillors from Andrew Boff, AM, Chair of the London Assembly's Planning and Regeneration Committee dated 2 September, which sets out the many disadvantages of residential high-rise buildings such as life-time costs, excessive density, impact on family lives, quality of design and post Covid 19 issues."

11.9 MOTION TO THE COUNCIL IN THE NAME OF COUNCILLOR ANDREW THORP

Recently the Scouts announced the launch of a new age group – Squirrels. This is Scouts for 4-5year olds, and it is particularly targeting wards disproportionately affected by the pandemic to help ensure all children have access to the same opportunities. Will the Council join me in welcoming the launch of Squirrels and help to promote uniformed youth organisations across the Borough so that they can reach the children and volunteers that need it most?

11.10 MOTION TO THE COUNCIL IN THE NAME OF COUNCILLOR MARIA ALEXANDROU

Low street lighting

Residents have raised concerns that the street lighting does not produce a safe and even level of illumination across the public highways and footpaths. The streetlights have been replaced with LED fixtures that are not being operated by the council at full capacity. In Bowes Ward the roads from Bounds Green to York Road have dark areas due to the dimmed lighting, creating a threatening situation, especially for women given the recent attacks highlighted in the news, with the potential for other criminal activity. Low level lighting results in an unsafe environment, residents fear venturing out for walks and daily routines therefore dark streets are inhibiting active travel which compromises the climate change agenda. Natural surveillance is greatly reduced as there is less footfall and no passing cars since the introduction of the LTNs. This worsens the personal safety aspect.

This Chamber agrees to:

- Listen to residents' concerns
- Review the effectiveness of the street lighting across the borough and Bowes Ward in particular
- Make improvements to any deficiencies highlighted by the review
- Consider lighting fixtures with wider light dispersal
- Risk assessment on equality, active travel and crime impact

11.11 MOTION TO THE COUNCIL IN THE NAME OF COUNCILLOR MICHEAL RYE

This Council resolves:

- to require all public firework displays within the local authority boundaries to be advertised in advance of the event, allowing residents to take precautions for their animals and vulnerable people
- to actively promote a public awareness campaign about the impact of fireworks on animal welfare and vulnerable people – including the precautions that can be taken to mitigate risks
- to encourage local suppliers of fireworks to stock 'quieter' fireworks for public display.

12. COMMITTEE MEMBERSHIPS

To confirm changes to Committee memberships agreed since the last meeting.

Any changes received once the agenda has been published will be tabled on the Council update sheet at the meeting.

13. OUTSIDE BODIES MEMBERSHIP

To confirm changes to outside bodies memberships agreed since the last meeting.

Any changes received once the agenda has been published will be tabled on the Council update sheet at the meeting.

14. DATE OF NEXT MEETING

To note the date of the next Council meeting as 26 January 2022.

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COUNCIL - 22.9.2021

**MINUTES OF THE MEETING OF THE COUNCIL
HELD ON WEDNESDAY, 22 SEPTEMBER 2021**

COUNCILLORS**PRESENT**

Sabri Ozaydin (Mayor), Christine Hamilton (Deputy Mayor), Mahmut Aksanoglu, Maria Alexandrou, Kate Anolue, Chinelo Anyanwu, Dinah Barry, Ian Barnes, Mahym Bedekova, Sinan Boztas, Yasemin Brett, Anne Brown, Alev Cazimoglu, Nesil Caliskan, Mustafa Cetinkaya, Katherine Chibah, Lee David-Sanders, Birsen Demirel, Ergin Erbil, Susan Erbil, Achilleas Georgiou, Ayten Guzel, Ahmet Hasan, Elaine Hayward, James Hockney, Stephanos Ioannou, Rick Jewell, Joanne Laban, Dino Lemonides, Tim Leaver, Derek Levy, Mary Maguire, Gina Needs, Terence Neville OBE JP, Ayfer Orhan, Ahmet Oykenner, George Savva MBE, Edward Smith, Jim Steven, Claire Stewart, Doug Taylor, Andrew Thorp, Mahtab Uddin, Glynis Vince, Hass Yusuf and Peter Fallart (Bush Hill Park)

ABSENT

Daniel Anderson, Tolga Aramaz, Guner Aydin, Clare De Silva, Chris Dey, Guney Dogan, Elif Erbil, Alessandro Georgiou, Margaret Greer, Charith Gunawardena, Saray Karakus, Nneka Keazor, Andy Milne, Lindsay Rawlings and Michael Rye OBE

1**THE MAYOR'S CHAPLAIN TO GIVE A BLESSING**

Reverend Mark Meatcher from the United Reform Church performed a blessing.

2**MAYOR'S ANNOUNCEMENTS IN CONNECTION WITH THE ORDINARY BUSINESS OF THE COUNCIL**

The Mayor welcomed Councillors back to the Chamber for the first time since the pandemic began. The Mayor spoke of the upcoming Mayors Charity Fun Run and wished everyone well.

3**APOLOGIES**

Apologies were received from Councillor Andreson, Aramaz, De Silva, Dey, Alessandro Georgiou, Gunawardena, Karakus, Rawlings and Rye.

4**MINUTES OF THE PREVIOUS MEETING**

The minutes of the meeting on the 14 July 2021 were agreed.

5

DECLARATION OF INTERESTS

Councillor Thorp disclosed an interest in Motion 12.6 as a Scouts employer.

Councillor Laban and Councillor Aksanglou declared an interest as they live, or have family members, living in properties with cladding.

6

OPPOSITION BUSINESS - STREET SCENE AND GENERAL ENVIRONMENT

Councillor Laban introduced the paper and made the following key points based on the paper:

- Over the last four years there has been a decline in street scene in the borough;
- Fly tipping has increased and there has been an increase in overflowing bins;
- Shrubbery and greenery in the borough is overgrown resulting in people being unable to walk on pavements;
- Fly tipping hot spots are largely ignored. Fly tipping is removed but the issue remains;
- She was pleased to see that bulky waste collections are now free as this should help ease the issue;
- Barrowell Green remains under a booking system despite Covid-19 restrictions easing;
- Many estates in the borough are unclean, and have looked this way for a number of years. During the pandemic bin capacity was not increased in these areas to deal with the additional waste produced by residents being at home more.

The majority party made the following points in response:

- Residents and councillors care deeply about the environment;
- Central Governments funding has made street scene and the general environment and this is an issue nationally. A national solution is required. Ministers have been written to ask for better funding;
- The Strategy for improving street scene and reducing fly tipping has been to Scrutiny and received a positive response;
- The borough has been affected by the shortage of drivers for bin collections. Thirty additional street cleaners have been hired and there are two more enforcement officers focused on estates who issue fixed penalty notices to those who fly tip;
- During the pandemic, extra bin bags were collected.
- Residents are able to book up to six collections for bulky waste;
- It was the previous Conservative administration who closed the Caterhatch Road recycling centre;
- Officers who worked tirelessly during the pandemic to keep the borough clean were thanked;

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- Reporting fly tipping can be done through the council website. Councillors were encouraged to do this so issues can be resolved as soon as possible by the correct team;
- Enfield Council has planted street trees, plant boxes and improved drainage systems to make the borough a better place.

The majority opposition also made the following points in support of the paper:

- Many residents have emailed concerns regarding street scene;
- Overgrown bushes by schools have forced residents to walk in the road and caused damage to cars;
- It is a basic service residents of the borough can expect for street scene to be maintained which has not been achieved;
- Residents want parks and green spaces grass cut and kept clean to reduce rubbish, pests and dog fouling in these areas;
- Concerns were raised about the skate park in Enfield which has not been cleaned recently.

The minority opposition made the following points:

- The recycling centre in Winchmore Hill being open for longer hours has meant an increase in noise pollution, fly tipping and queues outside resident's homes in the area;
- Environmental challenges require a fresh approach;
- Concerned that the paper mainly focuses on bins and does not comment enough on pollution and the incinerator in the borough;
- A number of points in the paper were covered during a recent scrutiny meeting which the Cabinet Member for Environment attended;
- Concerns were raised that fly tipping in the borough often happens by people who come from outside of Enfield;
- The Labour manifesto stated there would be a second recycling centre in the borough.

Following the discussion, the recommendations in the paper were not agreed.

7

SCRUTINY ANNUAL WORK PROGRAMMES 2021/22

Councillor Susan Erbil introduced the report and stated that the standing panels allow for better scrutiny. Overview and Scrutiny Committee will focus on the wider issues affecting the borough with panels focusing on the relevant areas.

Councillor David-Sanders spoke of his support for the report and the work the Chair of the Scrutiny Panels have contributed to ensure scrutiny is robust.

Councillor Levy stated he was proud to be on the Overview and Scrutiny Committee as the work undertaken is important.

Councillor Aksanoglu was grateful to sit on Overview and Scrutiny Committee and chair a panel, and is looking forward to the upcoming years work.

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AGREED to approve the annual scrutiny work programmes for 2021/22 for the Overview & Scrutiny Committee and Standing Panels.

8

TREASURY MANAGEMENT OUTTURN REPORT 2020/21

Councillor Mary Maguire, Cabinet Member for Finance, presented the Treasury Management Outturn Report for 2020/21. Whilst speaking to the report Councillor Maguire made the following points:

- That the key points were set out in paragraph 1 and the conclusion of the report;
- The impact of Covid-19 has resulted in some slippage in the Capital Programme
- Surplus cash balances have allowed the Council's borrowing to be reduced;
- Net borrowing costs have been reduced as financing has been paid off;
- The average cost of borrowing has reduced as expensive loans have been replaced;
- There is no debt rescheduling expected for this year.

The administration made the following points in support of the report:

- The Council has increased borrowing to be able to build affordable homes in the borough;
- By providing better housing, economies and communities will benefit;
- £147,000 had been made on interest in the last year by the Council;
- Risks associated with increases in interest rates are considered in the report and the Council's budget.
- Treasury advice has been sought around borrowing and this is factored into the Medium Term Financial Plan.

The majority opposition group made the following points in response:

- Borrowing has escalated cuts in frontline services and this will continue to increase;
- Bank of England rates are expected to shift and this will affect borrowing;
- Concerns were raised about future generations paying for the Council's debts;
- It was felt the poorest people in the borough would suffer most from the level of borrowing;
- Concerns were raised that 75% of the current loans will mature in 20 to 40 years' time.

The minority opposition group made the following points in response:

- The borrowing should be used to build affordable homes for Enfield residents;
- The level of debt affects the services the Council can provide which directly affects residents.

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AGREED to note and approve the 2020/21 Treasury Management Outturn Report.

9

CAPITAL STRATEGY 2022/23

Councillor Mary Maguire, Cabinet Member for Finance & Resources, introduced the report, and made the following key points:

- The Strategy supports the delivery of the Council's Capital Programme;
- The Capital Strategy is presented in advance of the Council's ten-year programme and will aid the long term financial plan whilst providing clarity on the Council's borrowing;
- A standardised approach to the appraisals of programmes and this is set out in detail in the report;
- A borrowing cap has been self-imposed;
- The Housing Gateway will be used to reduce the costs of housing residents in temporary accommodation;
- The Strategy provides good governance and a detailed risk assessment.

The administration provided the following points in support of the Capital Strategy 2022/23:

- Investment is being made into Council homes which in turn improves the quality of life for the borough's residents;
- Replacement fire doors have been put into 8,000 homes;
- Central Government is being called upon to provide more funding;
- Both the climate plan and the housing plan are well thought out;
- The Strategy considers expenditure and safeguards public services;
- The Meridian Water development will create 10,000 new homes in the borough;
- In the last 10 years, Enfield has experienced £7million worth of cuts;

The majority opposition made the following key points:

- They do not support the Capital Strategy as it increases debt
- Concerns were raised that pre-Covid the administration did not want to increase borrowing although this had since changed;
- Many projects continue to be rolled over to the next year as they are incomplete. Clarification was sought on how it can be ensured that projects are completed;
- Low Traffic Neighbourhoods were not supported by residents;
- The Council has already received money from Central Government to support the homeless;
- Residents already feel they are unable to contact the Council through phone and email;

The minority opposition made the following points:

- Concerns were raised that the types of homes being built are not necessarily what people in the borough need;

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- Temporary accommodation in the borough is not currently suitable for disabled residents;
- It was felt that an incinerator in the borough is not a suitable project

AGREED to approve the 2022/23 Capital Strategy attached in Appendix 1 of the report.

10

COUNCILLOR CONDUCT COMMITTEE ANNUAL REPORT

It was agreed this item would be heard after Motions as a result the item was agreed under the guillotine arrangements.

11

COUNCILLOR QUESTION TIME

Noted the Councillor Questions as set out in the Council agenda pack.

12

MOTIONS

Motion 10 in the name of Councillor Christine Hamilton:

“Wealth Tax

The Government's plan to fix the social care crisis' is yet more evidence that the current proposal was not the promise made in 2019. The proposal put forward by the Government is opposed across the country, even cabinet members are raising concerns about hitting low paid workers. The NHS/Care workers and lowest paid workers are the hardest hit of all through these changes.

This motion is to raise concerns from across the country to call on this Government to fund a new deal for social care, asking those with the broadest shoulders to pay the most. We are asking for the Government's plan to be changed as it is also doing nothing for disabled working age people with a cap on care costs benefiting on just a fraction of those who use social care.

Please support this motion.”

Following discussion the above motion was agreed. The remainder of Motions lapsed under the guillotine.

13

COMMITTEE MEMBERSHIPS

AGREED:

1. Councillor Aramaz to become Vice Chair of the Health and Adult Social Care Scrutiny Panel.

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14

NOMINATIONS TO OUTSIDE BODIES

Councillor Aramaz appointed as the Vice Chair of the Joint Health Overview and Scrutiny Committee.

15

DATE OF THE NEXT MEETING

The date of the next meeting was noted as 17 November 2021.

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London Borough of Enfield

Council

Meeting Date: 11 November 2021

Subject: Treasury Management Mid Year Report for 2021/22

Cabinet Member: Cllr Maguire

Executive Director: Fay Hammond

Key Decision: N/A

Purpose of Report

1. This report reviews the activities of the Council's Treasury Management function over the half year period ended 30 September 2021.
2. Over the reporting period, all treasury management (TM) activities have been carried out in accordance with the approved limits and the prudential indicators (PI) set out in the Council's Treasury Management Strategy statement.
3. The key points of the report are highlighted below:

		See section:
Borrowing Outstanding and Net Borrowing at 30th September 2021	A reduction of £11.8m since 31 st March 2021 and at 30 th September 2021 is £918.3m. Net Borrowing for this period is £874.7m with revised year end forecast of £1,170.8m, some £158m less than the original budget.	13 30 - 35
Capital Financing Requirement (CFR) Forecast for 31st March 2022	The closing borrowing CFR for 31 st March 2021 was £1,206.7m. The forecast for 31 st March 2022 has been revised down to £1,406m from £1,451.4m due to the current capital expenditure slippage.	36 - 38
Average interest on total borrowing outstanding	The average interest rate forecast for year end is 2.59% (was previously 2.62%). The estimated cost of borrowing for the year 2021/22 is £29.3m.	27 - 35
Investments & Net Borrowing, PFI & Finance Leases (Debt)	Interest earned on investments for the reporting period is £15k. The Investments portfolio at 30 th September 2021 is £43.6m. Net debt has decreased slightly by £19.8m from £895m as at 31 st March 2021 to £875m with the revised forecast for 2021/22 year end of £1,171m.	36 – 45 & 49
Loans	None undertaken.	50

Rescheduling		
Minimum Revenue Provision (MRP)	MRP chargeable to the General Fund (GF) for 2021/22 is £17.4m.	52
Compliance with Treasury Management & Prudential Indicators	No breaches. Officers introduced the new proposed CIPFA prudential and treasury indicators to test the Council's borrowing position and the strength of its affordability.	63 - 76
Borrowing Timing and Interest Rate Analysis	the Council plan to borrow a further £150m short term by year end. This will be converted to long term debt when the rates are advantageous.	77 - 86

Proposals

4. Members are asked to:
5. Note and comment on the contents of the report; and
6. Consider and recommend for approval the 2021/22 Mid Year Treasury Management position.

Reason for Proposals

7. To inform Council the Treasury Management performance for the half year period ended 30 September 2021.
8. The Council adopted the Chartered Institute of Public Finance and Accountancy's Treasury Management in the Public Services: Code of Practice (the CIPFA Code) which requires the Council to approve treasury management half yearly and annual reports.
9. The Council's Treasury Management Strategy for 2021/22 was approved at the Council's meeting on the 2nd March 2021. The Council has borrowed substantial sums of money and is therefore exposed to financial risks including the loss of invested funds and the revenue effect of changing interest rates.

Relevance to the Council's Corporate Plan

10. Good homes in well-connected neighbourhoods.
11. Build our Economy to create a thriving place.
12. Sustain Strong and healthy Communities.

Background

13. Enfield Council adopted the Chartered Institute of Public Finance and Accountancy's Treasury Management in the Public Services: Code of Practice (the CIPFA Code) which requires the Authority to approve treasury

management semi annual and annual reports. This midyear report provides an update.

14. The Council's Treasury Management strategy for 2021/22 was approved at the Council meeting on 2nd March 2021. The Council has borrowed substantial sums of money and is therefore exposed to financial risks including the loss of invested funds and the revenue effect of changing interest rates. The successful identification, monitoring and control of risk remains central to the Council's Treasury Management Strategy.
15. The 2017 Prudential Code includes a requirement for local authorities to provide a Capital Strategy, a summary document approved by full Council covering capital expenditure and financing, treasury management and non-treasury investments. The Council's Capital Strategy, complying with CIPFA's requirement, was approved by full Council on 2nd March 2021.
16. On 30th September 2021, the Council had net borrowing of £874.7m arising from its revenue and capital income and expenditure. The treasury management position as at 30th September 2021, the change over the six months, the original forecast position for 31st March 2021 and the revised budget position are shown in Table 1 below.

Table 1: Treasury Management Summary

	Actual Balance 31.03.21 £m	Movement £m	Actual Balance 30.09.21 £m	Original Estimate 31.03.22 £m	Revised Forecast 31.03.22 £m
Long-term borrowing	930.1	(11.8)	918.3	1,108.5	1,020.8
Short-term borrowing	0.0	(0.0)	0.0	220.0	150.0
Total borrowing	930.1	(11.8)	918.3	1,328.5	1,170.8
Total investments	(35.6)	(8.0)	(43.6)	(35.0)	(35.0)
Net borrowing	894.5	(19.8)	874.7	1,293.5	1,135.8

17. The underlying need to borrow for capital purposes is measured by the Capital Financing Requirement (CFR), while usable reserves and working capital are the underlying resources available for investment. These factors are summarised in Table 2 below.

Table 2: Balance Sheet Summary

	31 March 2021 Actual £m
General Fund CFR	933.5
HRA CFR	240.2

Borrowing CFR	1,173.7
External borrowing	930.1
Internal borrowing	241.6
Less: Usable reserves	(251.8)
Less: Working capital	45.8
Net investments	(35.6)

*finance leases, PFI liabilities and transferred debt that form part of the Council's total debt

ECONOMIC BACKGROUND

18. The Bank of England (BoE) has held Bank Rate at 0.1% throughout the period and maintained its Quantitative Easing programme at £895 billion, unchanged since the November 2020 meeting.
19. The global economy continues to recover from the pandemic but has entered a more challenging phase. The resurgence of demand has led to the expected rise in inflationary pressure, but disrupted factors of supply are amplifying the effects, increasing the likelihood of lower growth rates ahead. This is particularly apparent in the UK due to the impact of Brexit.
20. While Q2 UK GDP expanded more quickly than initially thought, the 'pandemic' and more latterly supply disruption will leave Q3 GDP broadly stagnant. The outlook also appears weaker. Household spending, the driver of the recovery to date, is under pressure from a combination of retail energy price rises, the end of government support programmes and soon, tax rises. Government spending, the other driver of recovery, will slow considerably as the economy is taken off life support.
21. Inflation rose to 3.2% in August. A combination of factors will drive this to over 4% in the near term. While the transitory factors affecting inflation, including the low base effect of 2020, are expected to unwind over time, the MPC has recently communicated fears that these transitory factors will feed longer-term inflation expectations that require tighter monetary policy to control. This has driven increased interest rate expectations substantially higher.
22. The supply imbalances are apparent in the labour market. While wage growth is currently elevated due to compositional and base factors, stories abound of higher wages for certain sectors, driving inflation expectations. It is uncertain whether a broad-based increase in wages is possible given the pressures on businesses.
23. Government bond yields increased sharply following the September Federal Open Market Committee (FOMC) and Monetary Policy Committee (MPC) minutes, in which both central banks communicated a lower tolerance for higher inflation than previously thought. The MPC in particular has doubled-down on these signals despite softer economic data. Bond investors expect higher near term interest rates but are also clearly uncertain about central bank policy.
24. The MPC appears to be playing both sides, but has made clear its intentions to tighten policy, possibly driven by a desire to move away from emergency

levels. While the economic outlook will be challenging, the signals from policymakers suggest Bank Rate will rise unless data indicates a more severe slowdown.

25. Arlingclose, the council's Treasury Advisers, expects Bank Rate to rise in Q2 2022. They believe this is driven as much by the Bank's desire to move from emergency levels as by fears of inflationary pressure. Given the current outlook, Arlingclose believes this could be a policy mistake.
26. Investors have priced in multiple rises in Bank Rate to 1% by 2024. While Arlingclose believes Bank Rate will rise, it is by a lesser extent than expected by markets.
27. Gilt yields have risen sharply as investors factor in higher interest rate and inflation expectations. From here, Arlingclose believes that gilt yields will be broadly steady, before falling as inflation decreases and market expectations fall in line with their forecast.
28. The risk around Arlingclose forecasts for Bank Rate is to the upside over the next few months, shifting to the downside in the medium term. The risks around the gilt yield forecasts are initially broadly balanced, shifting to the downside later.

BORROWING STRATEGY DURING 2021/22

29. The 2021/22 Treasury Management Strategy sets out an operational borrowing limit of £1,368m and maximum borrowing requirements of £1,668m for the year. As at 30th September there is still a potential for the Council to borrow up to a further £450 million, this level of borrowing has been revised due the current level of capital programme slippage. This matter is being closely monitored through the Council's 10 year capital programme model and the cash flow model.
30. The chief objective when borrowing has been to strike an appropriately low risk balance between securing low interest costs and achieving cost certainty over the period for which funds are required, with flexibility to renegotiate loans should the Council's long-term plans change being a secondary objective.
31. In keeping with these objectives, no new borrowing was undertaken while £11.8m of existing loans were allowed to mature without replacement. This strategy enabled the Council to reduce net borrowing costs (despite foregone investment income) and reduce overall treasury risk.
32. At 30th September 2021 the Council held £918.3m of loans, (a decrease of £11.8m since 1st April 2020), as part of its strategy for funding the Council's previous and current year's capital programmes. Outstanding loans on 30th September are summarised in Table 3 below.

Table 3: Borrowing Position

Type of Loan	31.3.21 Actual £m	Movement £m	30.9.21 Actual £m	31.3.22 *Original Forecast £m	31.3.22 ^Revised Forecast £m
PWLB	875.9	(10.8)	865.1	1,328.0	1,170.8
European Investment Bank	8.3	(0.2)	8.1	-	-
GLA	2.1	(0.5)	1.6	-	-
HNIP	21.6	0.0	21.6	-	-
LEEF	2.7	(0.3)	2.4	-	-
MEEF	15.0	0.0	15.0	-	-
SALIX	4.5	0.0	4.5	-	-
Total	930.1	(11.8)	918.3	1,328.0	1,170.8

*Original Forecast as stated in TMSS 2021/22, approved by Council 02 March 2021

^Revised Forecast based on current level of activities

33. The Council has 94 loans spread over 50 years with the average maturity being 29 years. The maturity profile allows the Council to spread the risk of high interest rates when debt matures in any one year. The average interest for the period is 2.59%.

The Capital Financing Requirement (CFR)

34. The Council has an increasing CFR due to the capital programme and an increasing borrowing requirement which takes into account usable reserves and working capital which are the underlying resources available for investment as shown in Table 4.

Table 4: Capital Financing Requirement (CFR)

Capital Financing Requirement (CFR)	Actual 31 March 2021 £m	Original Budget 31 March 2022 £m	Revised Budget 31 March 2022 £m
General Fund	933.5	1,155.7	1,122.1
Housing Revenue Account	240.2	295.7	283.6
Borrowing CFR	1,173.7	1,451.4	1,405.7
External Borrowing	930.1	1,328.8	1,170.8
Internal Borrowing	243.6	122.6	234.9
Authorised Limit	1,400.0	1,600.0	1,494.0

*Total CFR includes finance leases, PFI liabilities and transferred debt that form part of the Council's total debt

Other Debt Activity

35. The forecast for 31st March 2022 for Private Finance Initiative (PFI) or finance leases liabilities which represent the total debt other than borrowing for the Council is £30m after the repayment of circa £4m scheduled for the year.

Cost of Borrowing

36. The average interest rate forecast on total external debt for 2021/22 is 2.59% (2.64% in 2020/21). Table 6 shows the Council's total cost of maintaining its debt portfolio, as well as how the debt cost has been recharged to the HRA and to LBE Companies. The overall cost chargeable to the General Fund is £5.3 million.

Table 5: Cost of Borrowing

Type of Loan	Actual for 31.03.21	Actual as at 30.09.20	Forecast for 31.03.21
	£m	£m	£m
Public Works Loan Board	24.4	12.2	28.5
Local Authority	0.4	-	-
EIB	0.2	0.2	0.2
GLA	-	-	-
EEF	0.1	-	-
EEF	-	0.1	0.1
Salix	-	-	-
Total Interest on Long Term Debt	25.1	12.5	28.8
Short term Loans	1.1	-	0.6
Commission on loans	(0.1)	-	(0.1)
Total Interest Paid	23.9	12.5	29.3
Interest Income Receipts from:			
Housing Revenue Account	8.9	-	10.3
Capitalised Interest on Meridian Water	7.7	-	10.0
HGL	2.8	-	2.9
Energetik	0.5	-	0.8
General Fund	3.2	-	5.3
Total Cost of Debt	23.9	12.5	29.3

interest rate to meet the State Aid regulations set by the European Union.

Loans Maturity

38. The Council has 89 loans spread over 50 years with the average maturity being 26 years. The maturity profile allows the Council to spread the risk of high interest rates when debt matures in any one year.
39. The highest interest rate at 15.13%, a £1m PWLB loan matured on 1st November 2021, leaving a total of nine loans of total value of some £40m at 7.63% as the next highest interest rate loans in the Council's loan book. Table 6 shows the maturity structure of the Council's Loans portfolio as at 31 March 2021 and forecast for 31 March 2022:

Table 6: Profile of Maturing Loans

	Loans Outstanding Actual as at 31 March 21	Loans Outstanding Forecast for 31 March 22
	£m	£m
Under 1 year	25.0	74.6
1-2	23.8	93.5
2-5	46.5	113.2
5-10	134.6	131.4
10-15	130.4	124.1
15-20	155.4	146.9
20-25	33.4	31.1
25-30	70.2	68.3
30-35	87.7	87.7
35-40	44.3	44.3
40-45	88.8	88.8
45+	90.0	166.9
	930.1	1,170.8

Treasury Investment Activity

40. Total cash balances over the year varied considerably, predominantly because of the significant peaks and troughs arising from payment profiles of business rate collections, capital expenditure, DWP payments and housing benefit payments.
41. During this reporting period the Council's investment balance ranged between £5 million and £98 million due to timing differences between income and expenditure. The investment position at 30th September 2021 is shown in table 7 below.

Table 7: Treasury Investments

Counterparties	31.3.21 Actual £m	Movement £m	30.9.21 Actual £m
Money Market Funds			
Aberdeen (Ignis)	-	10.0	10.0
Aviva	-	-	-
CCLA	14.0	11.0	25.0
Deutsche	-	-	-
Federated	-	-	-
Goldman Sachs	-	-	-
HSBC Liquidity	-	-	-
Invesco	-	-	-
Call Accounts			
Santander	-	-	-
HSBC	21.5	(12.9)	8.6
Handelsbanken	-	-	-
	35.5	8.1	43.6

42. The Council generated investment income of £0.069m on cash balances held in call accounts and money market funds for this reporting period. On average the Council's cash investment portfolio had a risk weighting equivalent to AA+ credit rating.
43. Because the Council's externally managed funds have no defined maturity date, but are available for withdrawal after a notice period, their performance and continued suitability in meeting the Council's investment objectives are regularly reviewed.
44. In 2021/22 the Council expects to receive significantly lower income from its cash and short-dated money market investments than it did in 2020/21 and earlier years.

Investment Benchmarking

45. Both the CIPFA Code and Government guidance require the Council to invest its funds prudently, and to have regard to the security and liquidity of its treasury investments before seeking the optimum rate of return, or yield. The Council's objective when investing money is to strike an appropriate balance between risk and return, minimising the risk of incurring losses from defaults and the risk of receiving unsuitably low investment income.

Table 8 – Treasury investments managed in-house

	Credit Score	Credit Rating	Bail-in Exposure	Weighted Average Maturity (days)	Rate of Return %
31.03.2021	4.76	A+	100%	1	0.02%
30.06.2021	4.84	A+	100%	1	0.01%
30.09.2021	5.15	A+	100%	1	0.02%
Similar LAs	4.82	A+	79%	26	0.49%
All LAs	4.53	A+	69%	10	0.78%

46. The progression of risk and return metrics are being measured and monitored. An extract of the metrics being used from Arlingclose's quarterly investment benchmarking is shown in Table 8 above for the reporting period.
47. Continued downward pressure on short-dated cash rate brought net returns on sterling low volatility net asset value money market funds (LVNAV MMFs) close to zero even after some managers have temporarily lowered their fees. At this stage net negative returns are not the central case of most MMF managers over the short-term, and fee waivers should maintain positive net yields, but the possibility cannot be ruled out.
48. The return on Money Market Funds net of fees remain ultra low, one year to end of September 2021 at the range of 0% and 0.01%. The Council earned 0.02% on investments to date.

Non-Treasury Investment

49. The definition of investments in CIPFA's revised Treasury Management Code now covers all the financial assets of the Council as well as other non-financial assets which the Council holds primarily for financial return.
50. This is replicated in the Investment Guidance issued by Ministry of Housing, Communities and Local Government's (MHCLG) now named Department for Levelling Up, Housing and Communities, in which the definition of investments is further broadened to also include all such assets held partially for financial return.
51. The Council held £143m of such investments. Which currently consist solely loans but in future it will include provision of working capital and injection of equities into the companies. A list of the Council's non-treasury investments is shown in below table 9:

Table 9: Non-Treasury Investments

Loans made to LBE Companies	31.3.21 Balance £m	Movement £m	30.9.21 Balance £m
HGL	122.0	5.7	127.7

Energetik	12.9	2.4	15.3
EIL	0.2	(0.2)	-
Total	135.1	7.9	143.0

Net Debt (Borrowing, PFI & Leases)

52. The Council's net debt has reduced from £930.1m closing position of 2020/21 to £918.3m as demonstrated in Table 10. The estimated budget position for 2021/22 recognises that future capital expenditure will need to be financed from external borrowing and will create pressure on the revenue budget, however this impact has been recognised in the Council's Medium Term financial plan.

Table 10: Net Debt

	31.03.20 Actual £m	31.03.21 Actual £m	2021/22 Original Budget £m	2021/22 Revised Budget £m	2021/22 Interest Forecast £m
Companies	133.0	139.6	203.7	210.9	3.7
Meridian Water	303.7	336.9	399.9	399.9	10.0
Other GF*	445.6	457.0	552.1	511.3	5.3
HRA	226.7	240.2	295.7	283.6	10.3
Total Loans CFR	1,109.0	1,172.8	1,451.4	1,405.7	29.3
<i>Add: PFI & Finance leases</i>	<i>37.3</i>	<i>33.9</i>	<i>40.0</i>	<i>30.3</i>	<i>4.0</i>
<i>Less Internal Borrowing</i>	<i>(157.3)</i>	<i>(276.6)</i>	<i>(163.4)</i>	<i>(265.2)</i>	<i>-</i>
Total External Borrowing	989.0	930.1	1,328.0	1,170.8	33.3
Total treasury investments	(95.4)	(35.5)	(25.0)	(35.0)	(0.1)
Net Debt	893.6	894.6	1,303.0	1,135.8	33.2

Loans Restructuring

53. Loans restructuring normally involves prematurely replacing existing loans (at a premium or discount) with new loans to secure net savings in interest payable or a smoother maturity profile. Restructuring can involve the conversion of fixed rate interest loans to variable rate loans and vice versa.
54. No rescheduling was done during the year as the new PWLB borrowing rates and premature repayment rates made rescheduling uneconomic. The Council will continue to actively seek opportunities to restructure debt, if viable.

Minimum Revenue Provision

55. In accordance with the Local Government Act 2003, the Council is required to pay off an element of the accumulated General Fund capital expenditure, which was funded from borrowing, through an annual revenue charge known as the Minimum Revenue Provision (MRP).
56. In the 2021/22 TMSS that was approved by Council at its meeting in March 2021 had MRP budget for 2021/22 as £10m and interest chargeable to the General Fund (GF) of £8.9m. These figures have been revised and MRP chargeable to the GF now stands at £17.4m and interest chargeable is £5.3m.

Borrowing Update

57. Councils can borrow from the PWLB provided they can confirm they are not planning to purchase 'investment assets primarily for yield' in the current or next two financial years, with confirmation of the purpose of capital expenditure from the Section 151 Officer. Councils that are purchasing or intending to purchase investment assets primarily for yield will not be able to access the PWLB except to refinance existing loans or externalise internal borrowing.
58. Acceptable use of PWLB borrowing includes service delivery, housing, regeneration, preventative action, refinancing and treasury management.
59. Competitive market alternatives may be available for authorities with or without access to the PWLB. However, the financial strength of the individual council and borrowing purpose will be scrutinised by commercial lenders. Further changes to the CIPFA Prudential Code expected in December 2021 are likely to prohibit borrowing for the primary purpose of commercial return even where the source of borrowing is not the PWLB.
60. Enfield is not planning to purchase any investment assets primarily for yield within the next three years and so is able fully access the PWLB. The Council will continue to review its capital programme in light of PWLB lending arrangement changes and may consider the cancellation of planned purchases of assets primarily for yield so as to retain access to the PWLB.

Revised PWLB Guidance

61. HM Treasury published further guidance on PWLB borrowing in August 2021 providing additional detail and clarifications predominantly around the definition of an 'investment asset primarily for yield'. The principal aspects of the new guidance are:
 - i) Capital expenditure incurred or committed to before 26th November 2020 is allowable even for an 'investment asset primarily for yield'.
 - ii) Capital plans should be submitted by local authorities via a DELTA return. This open for the new financial year on 1st March and remain open all year. Returns must be updated if there is a change of more than 10%.

- iii) An asset held primarily to generate yield that serves no direct policy purpose should not be categorised as service delivery.
 - iv) Further detail on how local authorities purchasing investment assets primarily for yield can access the PWLB for the purposes of refinancing existing loans or externalising internal borrowing.
 - v) Additional detail on the sanctions which can be imposed for inappropriate use of the PWLB loan. These can include a request to cancel projects, restrictions to accessing the PLWB and requests for information on further plans.
62. **Changes to PWLB Terms and Conditions from 8th September 2021** - The settlement time for a PWLB loan has been extended from two working days (T+2) to five working days (T+5). In a move to protect the PWLB against negative interest rates, the minimum interest rate for PWLB loans has also been set at 0.01% and the interest charged on late repayments will be the higher of Bank of England Base Rate or 0.1%.
63. **Municipal Bonds Agency (MBA):** The MBA is working to deliver a new short-term loan solution, available in the first instance to principal local authorities in England, allowing them access to short-dated, low rate, flexible debt. The minimum loan size is expected to be £25 million. Importantly, local authorities will borrow in their own name and will not cross guarantee any other authorities.
64. If the Council plans future borrowing through the MBA, it will first ensure that it has thoroughly scrutinised the legal terms and conditions of the arrangement and is satisfied with them.
65. **UK Infrastructure Bank:** £4bn has been earmarked for of lending to local authorities by the UK Infrastructure Bank which is wholly owned and backed by HM Treasury. The availability of this lending to local authorities, for which there will be a bidding process, is yet to commence. Loans will be available for qualifying projects at gilt yields plus 0.6%, which is 0.2% lower than the PWLB

Compliance with Treasury Management Indicators

66. Within the prudential indicators there are several key indicators to ensure that the Council operates its activities within well defined limits. For example, the operational borrowing limit set by the Council, determines the external debt levels which are not normally expected to be exceeded, whereas the authorised borrowing limit represents a control on the maximum level of borrowing. This represents a limit beyond which external debt is prohibited, and this limit needs full council to approve any increase.
67. Since the beginning of this financial year 2021/22 the total loan debt was kept within the limits approved by the Council against an authorised limit of £1,494 million. The authorised limit (as defined by the Prudential Code) was set as a precaution against the failure, to receive a source of income or a major unexpected expenditure. In the unlikely event of this happening, the Council

would need to borrow on a temporary basis to cover the shortfall in cash receipts. Any significant breach must be reported to the Council.

68. Officers reports that all treasury management activities undertaken during the year complied fully with the CIPFA Code of Practice and the Council's approved Treasury Management Strategy or explain the areas of non-compliance. Compliance with specific investment limits is demonstrated in tables below.
69. Compliance with the authorised limit and operational boundary for external debt is demonstrated in table 11 below.

Table 11: Prudential Indicators

Debt Limits	30.9.21 Actual £m	2021/22 Maximum £m	2021/22 Operational Boundary £m	2021/22 Authorised Limit £m	Complied? Yes/No
Borrowing	918.3	1,171.0	1,171.0	1,464.0	Yes
PFI and Finance Leases	30.3	30.0	30.0	30.0	Yes
Total debt	948.6	1,201.0	1,201.0	1,494.0	Yes

70. Since the operational boundary is a management tool for in-year monitoring it is not significant if the operational boundary is breached on occasions due to variations in cash flow, and this is not counted as a compliance failure. Although total debt was not above the operational boundary during this reporting financial year.

Treasury Management Indicators

71. The Council measures and manages its exposures to treasury management risks using the following indicators.
72. Security: The Council has adopted a voluntary measure of its exposure to credit risk by monitoring the value weighted average credit rating and credit score of its investment portfolio. This is calculated by applying a score to each investment (AAA=1, AA+=2, etc.) and taking the arithmetic average, weighted by the size of each investment. Unrated investments are assigned a score based on their perceived risk.

Table 12: Credit Risk

	30.9.21 Actual	2021/22 Target	Complied?
Portfolio average credit rating	A+	A-	Yes
Portfolio average credit score	5.15	4.75	Yes

73. Liquidity: The Council has adopted a voluntary measure of its exposure to liquidity risk by monitoring the amount of cash available to meet unexpected payments within a rolling three-month period, without additional borrowing.

Table 13: Liquidity Risk Indicator

	30.9.21 Actual	2021/22 Target	Complied?
Total cash available within 3 months	£46.3	£25m	Yes

74. **Interest Rate Exposures:** This indicator is set to control the Council's exposure to interest rate risk. The Council held no variable interest rate debt during 2020/21. However, the Council's Treasury Management Strategy does permit variable interest rate loans.

Table 14: Interest Rate Risk Indicator

	30.9.21 Actual	2021/22 Limit	Complied?
Upper limit on one-year revenue impact of a 1% <u>rise</u> in interest rates	Nil	+£4m	Yes
Upper limit on one-year revenue impact of a 1% <u>fall</u> in interest rates	Nil	+£4m	Yes

75. The impact of a change in interest rates is calculated on the assumption that maturing loans and investment will be replaced at current rates.
76. **Maturity Structure of Borrowing:** This indicator is set to control the Council's exposure to refinancing risk. The upper and lower limits on the maturity structure of all borrowing were:

Table 15: Maturity Structure

	30.9.21 Actual	Upper Limit	Lower Limit	Complied?
Under 12 months	5.0%	30%	0%	Yes
12 months & within 24 months	2.5%	35%	0%	Yes
24 months and within 5 years	4.9%	40%	0%	Yes
5 years and within 10 years	14.2%	45%	0%	Yes
10 years and above	73.5%	100%	0%	Yes

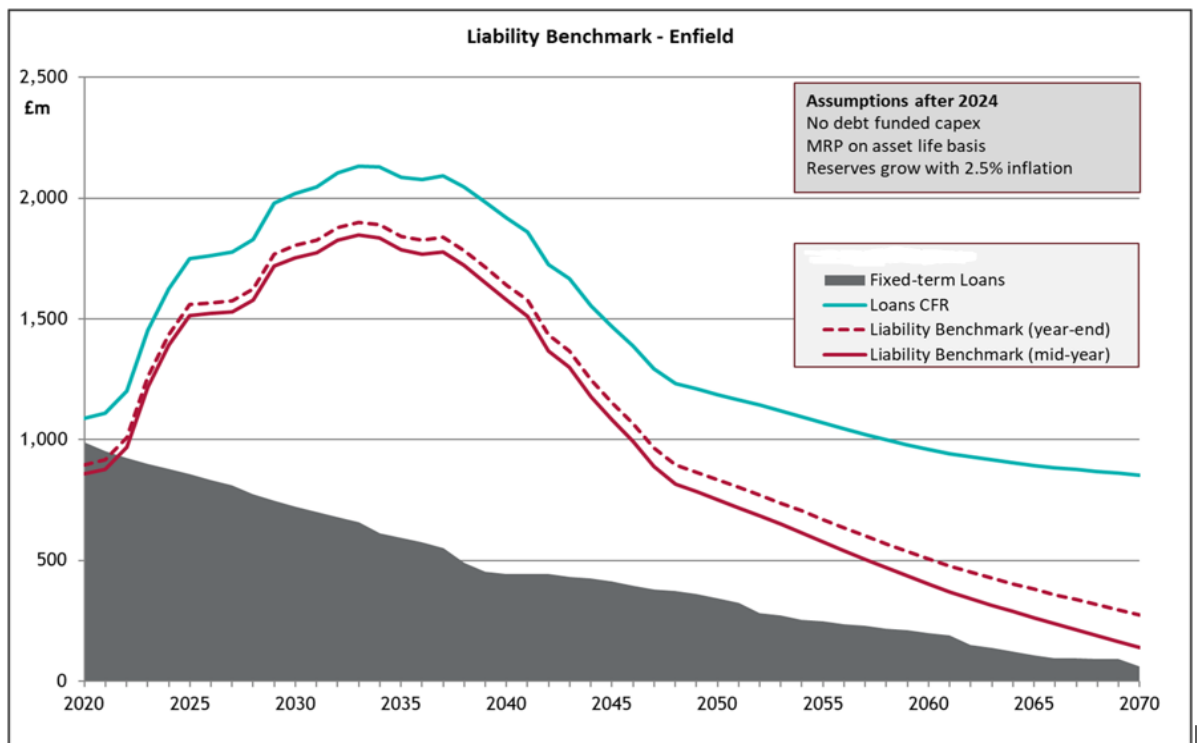
77. Principal Sums Invested for Periods Longer than a year: The purpose of this indicator is to control the Council's exposure to the risk of incurring losses by seeking early repayment of its investments. The limits on the long-term principal sum invested to final maturities beyond the period end were:

Table 16: Sum Invested Over One Year

	2021/22	2022/23	2022/24
Actual principal invested beyond year end	Nil	Nil	Nil
Limit on principal invested beyond year end	£15m	£15m	£15m
Complied?	Yes	Yes	Yes

Proposed CIPFA's Prudential and Treasury Indicators

78. Officers tested Enfield position with the new proposed Prudential and Treasury Indicators. Which are:
- i) **Liability benchmark** – CIPFA recommends that liability benchmark is produced for at least 10 years and should ideally cover the debt profile of a local authority. a new indicator to measure borrowing levels and the profile of its debt overtime.
- a. This indicator is based on the Council's future cash flows and its minimum revenue payment (MRP) forecast for repayment of debt in the future.
 - b. If debt exceeds the liability benchmark the authority has a cash surplus and is holding on deposit.
 - c. It is a measure of an authority's existing (and committed) loans portfolio that is compared with its forecast loan needs.
 - d. This benchmark should enable the authority to understand and manage its exposure to treasury risks.
 - e. Using the benchmark maturity profile or net loans benchmark enables the authority to minimise its treasury risks by matching its maturity profile to the liability benchmark.
 - f. The liability benchmark is not a single measure but requires graphical presentation of the net loans requirement and compares this with the Capital Financing Requirement and actual debt.
 - g. This is to promote good practice and understanding of local authority's debt management in relation to capital investment.
 - h. The below graph illustrates the Council's treasury position as per the approved 2021/22 Treasury Management Strategy Statement. It can be seen that the Enfield Council's debt do not exceed the liability benchmarks.



- ii) **External Debt to Net Revenue Stream ratio** as a new prudential indicator to assess proportionality. To ensure that the amount of debt incurred is proportionate to a local authority's total service expenditure on a taxation basis and helps a local authority to understand the relationship of debt to an authority's resources used to support services and demonstrate a local authority's financial sustainability. The below table indicates Enfield Council's positions as per the approved 2021/22 Treasury Management Strategy Statement.
- iii) **Net income from Commercial and Service Investments to Net Revenue Stream** – This ratio considers the Council's exposure to risk from commercial and service investment income. To allow elected members and the public to assess the Council's total risk exposure as a result of its investment decisions in commercial and service investments compared to the net resources it expends to support services on a taxation basis. The below table indicates the Council's positions as per the approved 2021/22 Treasury Management Strategy Statement.

New prudential indicator	Actual 2020/21	Estimated 2021/22
External debt to net revenue stream ratio	4.4:1	5.3:1
Income from commercial and service investments to net revenue stream	27.3%	33.9%

79. From the above table, it is evident that the level of the Council's capital activity is growing, and the income being generated from such activities has been

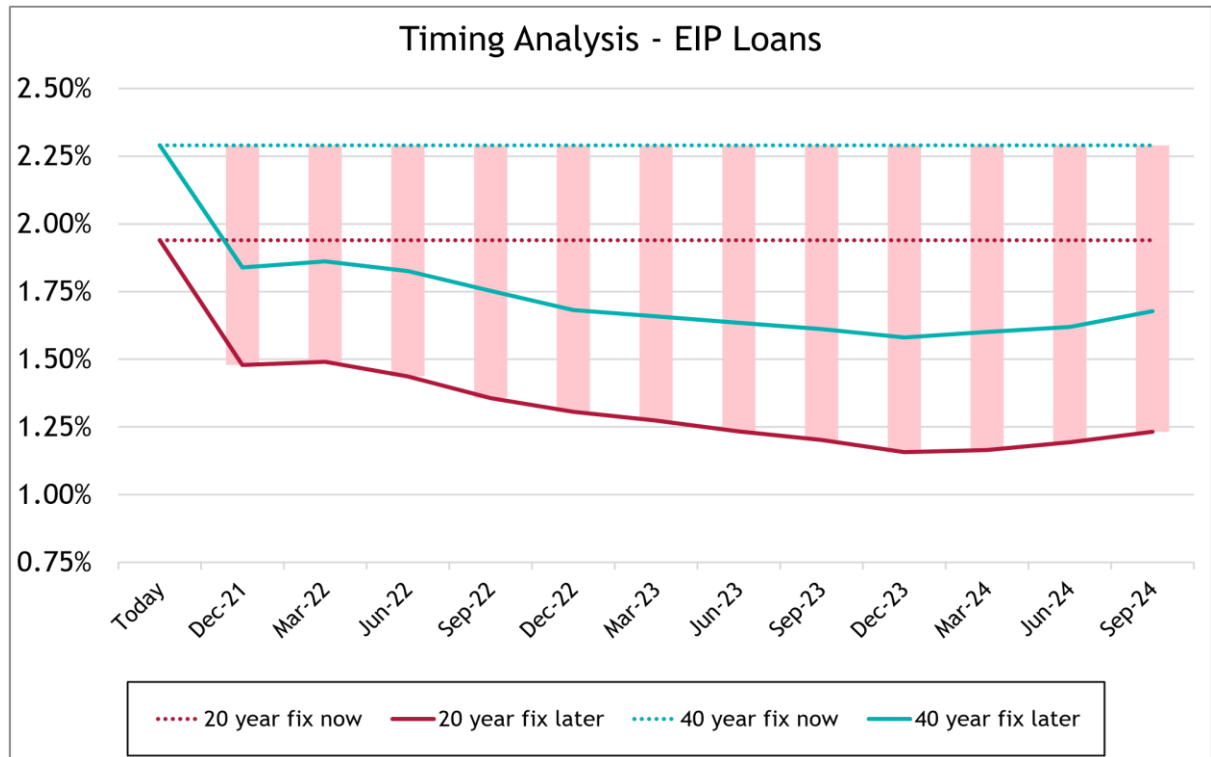
estimated to increase by 6.6% over the year to 31 March 2022; that is from 27.3% to 33.9%.

Borrowing Timing and Interest Rate Analysis

80. The Council's borrowing strategy continues to address the key issue of affordability without compromising the longer term stability of the debt portfolio. With short term interest rates currently much lower than long term rates, it is likely to be more cost effective in the short term to either use internal resources, or to borrow short term loans instead.
81. However, given the size of the Council's Capital Programme, and the need to diversify the Council's debt portfolio, long term borrowing will also be required during 2021/22, the strategy is to fulfil the Council's borrowing requirement with a mixture of long and short term borrowing.
82. By taking short term borrowing, the Council is able to reduce net borrowing costs. The benefits of short term borrowing will be monitored regularly against the potential for incurring additional costs by deferring longer term borrowing into future years when long term borrowing rates are forecast to rise modestly.
83. The Council's Treasury Advisers Arlingclose assist the Council with this "cost of carry" and breakeven analysis. Its output may determine to what extent the Council borrows additional sums at long term fixed rates in 2021/22 with a view to keeping future interest costs low, even if this causes additional cost in the short term. The strategy is to have no more than 30% of temporary/short-term loans in the borrowing portfolio.

Long-term Borrowing Timing Analysis

84. The Council has deferred over £150m of its capital expenditure plans which would result in a temporary funding requirement for 2021/22. Slippage is of course a delay only and schemes will be ultimately be delivered and need to be financed. However, the delay does mean the financing is required later and in the meanwhile the Council is paying down its existing commitments. Enfield is not alone in the slippage in its planned work and there is a similar picture in other local authorities.
85. The below graph illustrates that it is very expensive to borrow fixed rate today as 20 year rate is currently 1.95 and 40yr rate is currently 2.25% but by December 2021; 20 year rate will decline to 1.5% and 40yr rate will decline to 1.85%



"Fix now" shows the current PWLB EIP Rate. "Fix later" shows a blended rate from Arlingclose forecasts for 3 months money market rates and forward PWLB rates, adjusted for shorter term and reducing balance.

86. Interest rate risk is not across the whole debt portfolio of the Council. It is limited to maturing and new debt with existing fixed rate debt locked in over the long term. Inflation pressure on construction cost was also investigated as there was a large wage increase within the construction industry back in April 2021 and peaked 13.4% in May 2021, this has been declining from steadily since then to 5.9% at the end of August 2021. Please see Average Weekly Earnings Growth Excluding Bonuses table included in Appendix 1 of this report.
87. The Council has adopted a prudent approach to its forecasts of interest rate costs and for business case purposes has assumed interest rates at 3.5%. Over the past ten years of austerity with the continued environment of low interest rates the Council's historical average rate of interest on its debt has declined. As at 31 March 2019 it was 3.05%, as at 31 March 2020 it was 2.69%, as at 31 March 2021 it was 2.64% and is forecast to reduce still further at the end of the current financial year.
88. This position will continue into 2021/22 and beyond with historical relatively more expensive debt maturing and being refinanced. Currently, the PWLB rate (29 October 2021) for a 20 year Equal Instalment of Principal loan is 2.04%. Whilst PWLB has been the traditional source of debt for local authorities, private sector debt is also attractive with the base rate at 0.1% and private placements and bond issuances are options which were not as competitive in the past.
89. The 3.5% rate for planning is therefore clearly prudent and gives headroom for future rate rises. A key element of the Strategy to manage interest rate risk is to ensure that historical debt is not all maturing at the same time and

potentially forcing the Council to reborrow when rates are more expensive. This is a relatively low risk for the Council as a large proportion of its existing debt is EIP (Equal Instalment of Principal) or Annuity borrowing in which case there would only be a need to partially refinance at most. When taking on new debt the duration of the borrowing will be influenced by the profile of the existing debt portfolio.

90. The Council's Liability Benchmark with realistic inputs shows a long-term need for cash, of similar term and profile to the proposed loan. Cash investments are about to fall below acceptable minimum value of £10m. Short-term borrowing could otherwise rise to give an unpalatable exposure to interest rate risk.
91. Having considered the appropriate duration and structure of the Council's borrowing need based on realistic projections. The Council plan to borrow a total of £150m medium/longer-term fixed rate loans, to take advantage of the fall in external borrowing rates in the next 5 months and we would be borrowing a combination of short-term and medium-term repayment loans (annuity/EIP) / maturity loans. As short term loans from local to local is currently under 1%. These loans will provide some longer-term certainty and stability to the debt portfolio.

Cost of Carry

92. This happens when the Council borrows in advance of need. Currently, the Council could borrow at 2.04%, this would result in the Council having surplus cash in the bank that then needed to be invested for a short term at a very low investment rate of 0.05 to 0.15%. The cost of carry would be the difference between the borrowing rate, currently at 2.05% vs the current investment rate at most 0.15%. The current cost of carry is 1.9% (i.e. 2.05% - 0.15%), for each £10m we borrow in advance of need this would cost £190k per annum.
93. Professional judgement is required to monitor the timing of our cashflow and borrowing requirements to minimise the impact of cost of carry. This is balanced against taking long term loan rates at optimum time (i.e. when rates are at their lowest).

Safeguarding Implications

94. None arising from this report

Public Health Implications

95. The Council's Treasury Management indirectly contributes to the delivery of Public Health priorities in the Borough.

Equalities Impact of the Proposal

96. The Council is committed to Fairness for All to apply throughout all work and decisions made. The Council serves the whole borough fairly, tackling inequality through the provision of excellent services for all, targeted to meet

the needs of each area. The Council will listen to and understand the needs of all its communities.

Environmental and Climate Change Considerations

97. There are no environmental and climate change considerations arising from this report.

Risks that may arise if the proposed decision and related work is not taken

98. Lack of robust governance inevitably involves a degree of risk. The successful identification, monitoring and control of risk are therefore central to the Council's treasury management strategy.

Risks that may arise if the proposed decision is taken and actions that will be taken to manage these risks

99. Not approving the report recommendations and not adhering to the overriding legal requirements could impact on meeting the ongoing objectives of the Council's treasury activities.

Financial Implications

100. This is a noting report which fulfils the requirement to report annually the performance of the Council's treasury management activities. Financial implications are set out in the body of the report.

Legal Implications

101. The Local Government Act 2003 provides a framework for the capital finance of local authorities. It provides a power to borrow and imposes a duty on local authorities to determine an affordable borrowing limit. It provides a power to invest. Fundamental to the operation of the scheme is an understanding that authorities will have regard to proper accounting practices recommended by the Chartered Institute of Public Finance and Accountancy (CIPFA) in carrying out capital finance functions.
102. The Local Authorities (Capital Finance and Accounting) (England) Regulations 2003 require the Council to have regard to the CIPFA publication "Treasury Management in the Public Services: Code of Practice and Cross-Sectoral Guidance Notes" ("the Treasury Management Code") in carrying out capital finance functions under the Local Government Act 2003.
103. This noting report of the Executive Director of Resources advises Council of the Council's borrowing and investment activities for the half-year ending 30th September 2021 and is consistent with the key principles expressed in the Treasury Management Code. The Executive Director of Resources has responsibility for overseeing the proper administration of the Council's financial affairs, as required by section 151 of the Local Government Act 1972 and is the appropriate officer to advise in relation to these matters.

Workforce Implications

104. The employer's contribution is a significant element of the Council's budget and consequently any improvement in investment performance and having a significant reduction in cost of borrowing will allow the Council to meet this obligation easily and could also make resources available for other corporate priorities.
105. This report helps in addressing value for money through benchmarking the Council's performance against other Local Authority and London Boroughs.

Property Implications

106. None

Other Implications

107. None

Options Considered

108. The CIPFA TM code require that the Council establishes arrangements for monitoring its investments and borrowing activities hence the performance and activities of the Council's treasury operations is being reported to this Committee on a regular basis. This report is required to comply with the Council's Treasury Management Policy statement, agreed by Council.

Conclusions

109. The Council held outstanding investments of £43.6m as at 30th September 2021. This portfolio earned interest of £0.06m for the reporting period.
110. Gross Debt (Council's total borrowing, PFI and Finance Leases) stood at £948.3m, this is a reduction from the opening balance of £960.3m. The original gross debt forecast for 2021/22 was £1,368.8m and now revised down to £1,201m due to capital programme slippage and the ongoing Covid 19 pandemic effects.
111. The revised borrowing CFR forecast for 2020/21 is in excess of last year closing position of £1,172.8m by some £232.9m to £1,405.7m. See section 49 for more details. The MRP charge for 2021/22 is £17.4m, see section 53 for more details.
112. The Total Borrowing for the reporting period stood at £918.3m, a reduction of £11.8m over 2020/21 closing balance of £930.1m. The original total borrowing forecast for 2021/22 was £1,328m, now revised down to £1,170.8m, this equates to some £157.2m reduction in borrowing need for this financial year. For more details, see section 49.
113. The net borrowing is the difference between total investments outstanding and the total borrowing outstanding. For this reporting period, it stood at £874.7m and the net debt (borrowing including PFI and finance leases) position is £905m. For more details, see section 14.

114. The gross interest forecast for financing external borrowing for the year are £29.3m and the proportion of interest chargeable to the General Fund for the 2021/22 is £5.3m. For more details, see section 34.
115. The Council loans to its companies stood at £143m for this reporting period. Future provisions to the companies will include provision of working capital and injection of equities into the companies. For more details, see section 48.
116. Over the reporting year all treasury management (TM) activities have been carried out in accordance with the approved limits and the prudential indicators (PI) set out in the Council's Treasury Management Strategy statement. For more details, see section 63 – 76.
117. For this financial year, the Council plan to borrow a total of £150m medium/longer-term fixed rate loans, to take advantage of the fall in external borrowing rates in the next 5 months and we would be borrowing a combination of short-term and medium-term repayment loans (annuity/EIP) / maturity loans. As short term loans from local to local is currently under 1%. These loans will provide some longer-term certainty and stability to the debt portfolio.

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Date of report 20th October 2021

Appendices

Appendix 1 – Economic Commentary

Background Papers

The following documents have been relied on in the preparation of this report:

- i) Treasury Management Strategy Statement 2021/22 (Approved by Council, 02 March 2021)
- ii) Arlingclose – Treasury Mid Year Template for 2021/22
- iii) Arlingclose – Enfield Benchmarking-credit-scores for September 2021

Appendix 1 – Economic Commentary

Economic Update

- 1) BoE expectations for GDP growth for the third (calendar) quarter were revised down to 2.1% (from 2.9%), in part reflecting tighter supply conditions. The path of CPI inflation is now expected to rise slightly above 4% in the last three months of 2021, due to higher energy prices and core goods inflation. While the Monetary Policy Committee meeting ended with policy rates unchanged, the tone was more hawkish.
- 2) Government initiatives continued to support the economy over the quarter but came to an end on 30th September 2021, with businesses required to either take back the 1.6 million workers on the furlough scheme or make them redundant.
- 3) The latest labour market data showed that in the three months to July 2021 the unemployment rate fell to 4.6%. The employment rate increased, and economic activity rates decreased, suggesting an improving labour market picture. Latest data showed growth in average total pay (including bonuses) and regular pay (excluding bonuses) among employees was 8.3% and 6.3% respectively over the period. However, part of the robust growth figures is due to a base effect from a decline in average pay in the spring of last year associated with the furlough scheme.
- 4) Annual CPI inflation rose to 3.2% in August, exceeding expectations for 2.9%, with the largest upward contribution coming from restaurants and hotels. The Bank of England now expects inflation to exceed 4% by the end of the calendar year owing largely to developments in energy and goods prices. The Office of National Statistics' (ONS') preferred measure of CPIH which includes owner-occupied housing was 3.0% year/year, marginally higher than expectations for 2.7%.
- 5) The easing of restrictions boosted activity in the second quarter of calendar year, helping push GDP up by 5.5% q/q (final estimate vs 4.8% q/q initial estimate). Household consumption was the largest contributor. Within the sector breakdown production contributed 1.0% q/q, construction 3.8% q/q and services 6.5% q/q, taking all of these close to their pre-pandemic levels.
- 6) The US economy grew by 6.3% in Q1 2021 (Jan-Mar) and then by an even stronger 6.6% in Q2 as the recovery continued. The Federal Reserve maintained its main interest rate at between 0% and 0.25% over the period but in its most recent meeting made suggestion that monetary policy may start to be tightened soon.
- 7) The European Central Bank maintained its base rate at 0%, deposit rate at -0.5%, and asset purchase scheme at €1.85 trillion.

FINANCIAL MARKETS

- 8) Monetary and fiscal stimulus together with rising economic growth and the ongoing vaccine rollout programmes continued to support equity markets over most of the period, albeit with a bumpy ride towards the end.
- 9) The Dow Jones hit another record high while the UK-focused FTSE 250 index continued making gains over pre-pandemic levels. The more internationally focused FTSE 100 saw more modest gains over the period and remains below its pre-crisis peak.
- 10) Inflation worries continued during the period. Declines in bond yields in the first quarter of the financial year suggested bond markets were expecting any general price increases to be less severe, or more transitory, that was previously thought. However, an increase in gas prices in the UK and EU, supply shortages and a dearth of HGV and lorry drivers with companies willing to pay more to secure their services, has caused problems for a range of industries and, in some instance, lead to higher prices.
- 11) The 5-year UK benchmark gilt yield began the financial year at 0.36% before declining to 0.33% by the end of June 2021 and then climbing to 0.64% on 30th September. Over the same period the 10-year gilt yield fell from 0.80% to 0.71% before rising to 1.03% and the 20-year yield declined from 1.31% to 1.21% and then increased to 1.37%.
- 12) The Sterling Overnight Rate (SONIA) averaged 0.05% over the quarter.

CREDIT REVIEW

- 13) Credit default swap spreads were flat over most of period and are broadly in line with their pre-pandemic levels.
- 14) In late September spreads rose by a few basis points due to concerns around Chinese property developer Evergrande defaulting but are now falling back. The gap in spreads between UK ringfenced and non-ringfenced entities continued to narrow, but Santander UK remained an outlier compared to the other ringfenced/retail banks.
- 15) At the end of the period Santander UK was trading the highest at 53bps and Lloyds Banks Plc the lowest at 32bps. The other ringfenced banks were trading between 37-39bps and Nationwide Building Society was 39bps.
- 16) Over the period Fitch and Moody's upwardly revised to stable the outlook on a number of UK banks and building societies on our counterparty list, recognising their improved capital positions compared to last year and better economic growth prospects in the UK.
- 17) Fitch also revised the outlooks for Nordea, Svenska Handelsbanken and Handelsbanken plc to stable from negative. The rating agency considered the improved economic prospects in the Nordic region to have reduced the baseline downside risks it previously assigned to the lenders.

- 18) The successful vaccine rollout programme is credit positive for the financial services sector in general and the improved economic outlook has meant some institutions have been able to reduce provisions for bad loans. While there is still uncertainty around the full extent of the losses banks and building societies will suffer due to the pandemic-related economic slowdown, the sector is in a generally better position now compared to earlier this year and 2020.
- 19) The institutions on Council's counterparty list and recommended duration remain under constant review, but at the end of this reporting period no changes had been made to the names on the list or the recommended maximum duration.

Latest – Extract from UK Budget

- 20) Chancellor Rishi Sunak outlined his budget on Wednesday 27th October, outlining the government's tax and spending plans for the year ahead. The Government were trying to push ahead with a post-Covid focus. The Chancellor outlined the current situation in the economy and the state of public finances. It wasn't as grim listening as some forecasters had expected, however there were some still rather punchy numbers issued by the Office for Budget.

		Forecast					
	2020	2021	2022	2023	2024	2025	2026
GDP Growth	-9.8	6.5	6	2.1	1.3	1.6	1.7
GDP Growth per capita	-10.2	6.3	5.6	1.7	1	1.3	1.4
CPI Inflation	0.9	2.3	4	2.6	2.1	2	2
Employment (millions)	32.5	32.2	32.6	33	33.2	33.3	33.4
Unemployment (% rate)	4.6	4.9	4.8	4.3	4.2	4.2	4.2
Productivity per hour	0.6	0.5	0.9	1.3	1.3	1.3	1.4

- 21) The remainder of the budget speech focused on adjustments to universal credit taper rate, a confirmation of business rates and the associated reform, and significantly an increase to the national living wage of 6.6% to £9.50/hour.
- 22) Government spending is set to increase totalling £150 billion over the course of this Parliament. The Levelling Up fund will mean £1.7bn invested in local areas across the UK. Various tax adjustments including tax relief for museums, alcohol duty changes and domestic air travel.
- 23) In what some will consider a boost for the housing market, £24bn has been earmarked for housing, including £11.5bn for up to 180,000 affordable homes, with brownfield sites targeted for development. Also included was a 4% levy on high rise property developer with profits over £25 million to help fund the removal of unsafe cladding.

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London Borough of Enfield**Council****Meeting Date: 17 November 2021**

Subject:	Polling District and Polling Place Review
Cabinet Member:	Not applicable
Chief Executive:	Ian Davis
Key Decision:	Not Applicable

Purpose of Report

1. To consider the polling district and polling place scheme 2022.

Proposal(s)

2. Council is asked to:
 - ❖ To note the submissions made to Council in respect of the review of polling districts and polling places as set out in Appendix 5.
 - ❖ To note the review process undertaken by the General Purposes Committee.
 - ❖ To approve the adoption of parliamentary polling districts and parliamentary polling places as set out in the scheme contained in Appendix 1.
 - ❖ To approve the reasons given in the report in respect of the designation of parliamentary polling districts and parliamentary polling places.
 - ❖ To approve the scheme contained in Appendix 1 to be adopted in relation to all referenda and elections.
 - ❖ To instruct the Director of Law & Governance to publish such notices and other documentation required by law on completion of the review.
 - ❖ To instruct the Electoral Registration Officer to make the necessary amendments to polling districts for the 1 December 2021 electoral register.
 - ❖ To instruct the Electoral Registration Officer to merge the polling districts whose label includes a number for the 1 December 2022 electoral register.
 - ❖ To delegate authority to the Director of Law & Governance in consultation with the Chair of General Purposes Committee to make, where necessary, minor alterations to the polling scheme prior to the next compulsory review (October 2023 to January 2025).

Reason for Proposal(s)

3. The Local Government Boundary Commission for England (LGBCE) Order for the London Borough of Enfield Electoral Review created new ward boundaries effective from May 2022. The LGBCE created 25 wards, four more than there are currently. The number of councillors will remain the same. The 63 councillors will represent 13 three-councillor wards and 12 two-councillor

wards. A new polling scheme is required to reflect the new boundaries at the revision of the electoral register on 1 December 2021.

Relevance to the Council Plan

4. The alteration of polling districts to be implemented in the borough will not impact on the Enfield Council Plan 2020-2022.

Background

5. The statutory responsibility for reviewing UK Parliamentary polling districts and places rests with each relevant local authority in Great Britain for so much of any constituency as is situated in its area.
6. The responsibility to provide recommendations to Council on electoral arrangements in the borough relating to the designation of polling districts and polling places lies with the General Purposes Committee.
7. The Electoral Registration and Administration Act 2013 amended the Representation of the People Act 1983 to require the Council to undertake regular reviews of both polling districts and polling places within its area. The differences between a district, place and station are as follows:
 - A polling district is a geographical sub-division of an electoral area, (an electoral area being a UK Parliamentary constituency, a European Parliamentary electoral region, a parish, parish ward or an electoral division).
 - A polling place is the building or area in which polling stations will be selected by the Returning Officer. A polling place within a polling district must be designated so that polling stations are within easy reach of all electors from across the polling district.
 - A polling station is room or area within the polling place where voting takes place. Unlike polling districts and polling places which are fixed by the local authority, polling stations are chosen by the relevant Returning Officer for the election. The Returning Officer for the particular election must provide a sufficient number of polling stations and allocate the electors to those polling stations in such manner as he or she thinks the most convenient.
8. The purpose of such a review is to ensure that all electors have reasonably practicable facilities for voting and that polling places are reasonably accessible to electors who are disabled.
9. The Act requires the Council to publish notice of a Polling District and Polling Place review and to consult both the Acting Returning Officer (ARO) for parliamentary elections and persons whom the Council considers have particular expertise in relation to access to premises or facilities for persons who have disabilities. In addition, anyone may comment on the review.
10. In relation to the 1 July to 1 December 2021 period, the Acting Returning Officer considered the following:

- a. Annual canvass June to December 2021
- b. Revised electoral register scheduled to be published on 1 December 2021
- c. By elections during the review period
- d. Scheduling approval of the proposals
- e. Proposals to be submitted to Council in good time for approval prior to publication.
- f. Awareness of current parliamentary constituency boundaries.

Review process 2021

11. The General Purposes Committee at its meeting on 4 August 2021 approved the timetable for the formal review process as set out below.

Month	Activity
May to Jul 2021	Preliminary review: Gather and analyse evidence (electorate forecasts, demographics, engage with elected members)
4 Aug 2021	Report to the Committee on the programme of work for the preliminary and formal review
5 Aug 2021	Publish a notice of the holding of the formal review
5 Aug 2021	Publish ARO representation
5 Aug - 20 Sep 2021	Public consultation period
August 2021	Consultation materials forwarded for comment to key stakeholders including: <ul style="list-style-type: none"> • Disability and Carers groups • Community groups • Elected representatives
14 Oct 2021	General Purpose Committee to consider representations and make recommendations to Council
17 Nov 2021	Council to consider recommendations from General Purpose Committee
Nov 2021	Amend the electoral software to reflect new polling scheme
1 Dec 2021	Publish revised register with new polling districts*

❖ *It should be noted that if an unscheduled election were to take place in December, the electoral register would need to be published on the existing scheme. This would ensure that polling station information contained on poll cards remained accurate for election day. In this circumstance, the electoral register would need to be re-published on 1 January or 1 February 2022, to reflect the new scheme.*

12. A preliminary review was undertaken of the current polling districts and polling places with a view to establishing their suitability and identifying any potential alternatives where required following the new ward boundaries.

13. The following data and information were used to assist with the preliminary review:
- Population density heat maps
 - Data provided to the LGBCE detailing proposed areas of new development, the approximate number of dwellings and expected population numbers for those areas.
 - Road traffic maps highlighting levels of congestion
 - List of School Streets and Low Traffic Neighbourhoods (LTNs)
 - Public transport accessibility data
 - Details of current polling places and an indication as to their overall suitability for purpose
 - Presiding Officer/Polling Station Inspector comments from May 2021 GLA election
 - Surveys completed as part of the 2019 polling place review
 - Ward profile information including levels of deprivation, ethnicity and disability data
 - Site visits were undertaken to assess the suitability of alternative venues.
14. All ward councillors were invited to drop-in sessions during the period 28 June to 7 July, to offer information and local knowledge to aid the Acting Returning Officer when considering proposals for both polling districts and polling places.
15. The formal review process commenced on 5 August 2021 with the publishing of the notice of the review.
16. The Electoral Commission's guidance is attached at Appendix 8 which provides more detailed requirements on the Formal Review Process (para 4.5) and Considering Accessibility Issues (para 4.6).
17. In accordance with the guidance, when carrying out the review, local authorities must:
- publish a notice of the holding of a review
 - consult the ARO for every parliamentary constituency which is wholly or partly in its area
 - publish all representations made by an ARO within 30 days of receipt by posting a copy of them at the local authority's office and in at least one conspicuous place in their area and, if the authority maintains a website, by placing a copy on the authority's website
 - seek representations from such persons as it thinks have particular expertise in relation to access to premises or facilities for persons who have different forms of disability. Such persons must have an opportunity to make representations and to comment on the representations made by the AROs.

- on completion of a review, give reasons for its decisions and publish:
 - all correspondence sent to an (Acting) Returning Officer in connection with the review
 - all correspondence sent to any person whom the authority thinks has particular expertise in relation to access to premises or facilities for persons who have different forms of disability
 - all representations made by any person in connection with the review
 - the minutes of any meeting held by the council to consider any revision to the designation of polling districts or polling places within its area as a result of the review
 - details of the designation of polling districts and polling places within the local authority area as a result of the review
 - details of the places where the results of the review have been published.

Main Considerations for the Council

Consultation approach and representations received

18. Consideration was given to the school holiday period. Therefore, the consultation period ran between 5 August 2021 and 20 September 2021. Documents relating to the review were made available on the Council's website and at the Civic Centre. Representations could be submitted via the online questionnaire, or in writing via email or by post.
19. Representations were sought from such persons as the Council considers to have particular expertise in relation to access to premises or facilities for person who have different forms of disability. A list of consultees is attached at Appendix 4.
20. The Acting Returning Officer (ARO) for Edmonton, Enfield North and Enfield Southgate parliamentary constituencies provided a submission which was published on 5 August 2021. The ARO's submission which included the methodology, approach and proposals was made available on the Council website from 5 August and at Enfield Civic Centre.
21. As part of the consultation process, all London Borough of Enfield councillors, the Members of Parliament for Enfield's three parliamentary constituencies, the Greater London Assembly Member for Enfield & Haringey, and agents for candidates who have stood in London Borough of Enfield elections in recent years were invited to respond to the consultation via email.
22. The public consultation was advertised on the Council website, the Council's social media channels, internal staff channels, clear channel boards around the borough, in local newspapers (Enfield Independent, The Albanian, Parikiaki and Avrupa), Council e-newsletters and at ward forums.
23. The consultation was forwarded to around 480 community groups including disability groups, sports clubs, residents' groups, faith groups, youth centres

and charities. Members of the Enfield Faith Forum were invited to comment on the proposed polling scheme.

24. The Council's Staff Disability Working Group were also invited to comment on the accessibility of polling places in the borough.

Consultation responses

25. In total, responses were received from 28 individuals or organisations in relation to 16 wards. All responses are summarised at Appendix 5 along with information from the proposals attached at Appendix 1.

26. In the main, the responses received supported the Acting Returning Officer's proposals with minor amendments suggested to polling district boundaries and/or polling places.

27. A workshop was held for the members of General Purposes Committee to discuss the representations received and to consider accessibility and convenience for electors.

28. A number of responses received were outside the scope of this review and therefore cannot be addressed as part of this report. This includes: ward boundary changes, changes to the number of councillors per ward, postal voting and general feedback on accessibility not related to a specific venue. These responses are summarised at the end of Appendix 5. Where appropriate, these responses will be passed to the relevant department.

Polling district, polling place and polling station requirements

29. The proposed polling district and polling place scheme has been devised to meet the following statutory requirements that the Council must consider when designating polling districts and polling places:

- The Council must designate a polling place for each polling district, unless the size or other circumstances of a polling district are such that the situation of the polling stations does not materially affect the convenience of the electors.
- The polling place must be an area in the district, unless special circumstances make it desirable to designate an area wholly or partly outside. There are 7 polling districts which have been assigned a polling place outside the ward boundaries. This is due to there being no suitable venue within the ward boundaries.
- The polling place must be small enough to indicate to electors in different parts of the district how they will be able to reach the polling station.
- The polling place must, as far as is reasonable and practicable, be accessible to electors with disabilities.

30. A number of other considerations have been taken into account when devising the polling district and polling place scheme. They have been summarised in paragraphs 32 to 37.
31. All consultation responses received have been considered when devising the proposed polling district and polling place scheme.

Parliamentary boundaries

32. The parliamentary boundaries are not affected by the ward boundary changes coming into effect in May 2022. For areas where the ward boundaries are no longer coterminous with the parliamentary constituency boundary, it is required to retain a separate polling district to enable the electors to be registered within the existing parliamentary constituency boundary and the future ward boundary. The polling district labelling described in paragraph 39 includes the final letter denoting the constituency.

Polling district boundaries

33. Where possible, natural barriers such as rivers or watercourses and manmade barriers such as major roads and railways have been used to delineate areas. Other obstacles to voters crossing the polling districts have been considered such as steep hills or limited public transport links.

Polling districts currently in different wards

34. The inclusion of a number in the polling district letters denotes polling districts from different current wards that will attend the same polling place under the new proposals. The separate polling districts ensure that current elected representatives can be provided with electoral alterations in accordance with the statutory requirements. After the elections in May 2022 the polling districts will be merged into one polling district at the next revision of the register.

Polling places and stations

35. To comply with Electoral Commission guidance, the number of electors allocated to each polling station should not exceed 2,500. This excludes postal voters and those not eligible to vote. Where a polling district has been allocated more than 2,500 electors, the electorate is split between two polling stations in the same venue. This is known as a double polling station.
36. It should be noted that for the purpose of taking the poll in England and Wales, the ARO is entitled to use free of charge schools maintained or assisted by a local authority as well as those schools that receive grants made out of moneys provided by Parliament. This includes academies and free schools. It is acknowledged that the use of schools as polling places can cause disruption to pupils, parents and teachers. However, schools are often

the most suitable, and sometimes the only, appropriate building within a polling district. In order to avoid unnecessary disruption to pupil's education, school premises should only be designated where there are no alternative suitable premises within the polling district. The ARO also works closely with those schools identified as polling places to support them to keep the majority of their building open on polling day wherever possible. The proposed polling scheme reduces the number of schools by 5.

37. It is acknowledged that temporary buildings are significantly more expensive than permanent premises and may require significant parking restrictions which have a negative impact on residents. The deployment of temporary buildings has been limited to areas where there are no available alternatives.

Proposed polling district and polling place scheme

38. The proposed polling district and polling place scheme was approved by the General Purposes Committee on 14 October 2021 and is recommended for approval by Council. The scheme is set out in detail in Appendix 1. The proposals include the following details:

- Map showing the polling district boundaries and location of polling places
- Polling district letters and description of polling district boundaries
- Parliamentary constituency
- Polling place
- Recommended number of polling stations to be used at a combined local and parliamentary election
- Estimated number of in-person electors
- Assessment of disabled access
- Justification for any amendments or no change proposals
- Following approval of the polling scheme by the General Purposes Committee, extensive cross-checking of the properties within each polling district has been undertaken. A number of minor adjustments of the polling district boundaries were made and are listed in Appendix 1.

39. The following labelling convention has been used for the polling district letters:

- First two letters denote the ward (e.g. AG for Arnos Grove)
- Third letter denotes the polling district (e.g. A, B, C, etc.)
- Inclusion of number indicates polling districts that are currently in separate wards and which will be merged following the May 2022 elections.
- X, Y or Z indicates the parliamentary constituency.

40. The proposals recommend a total number of 108 polling places.

Safeguarding Implications

41. None

Public Health Implications

42. None

Equalities Impact of the Proposal

43. Local authorities have a duty to review the accessibility of all polling places to disabled voters and ensure that every polling place and prospective polling place for which it is responsible is accessible to disabled voters 'so far as is reasonable and practicable'.

44. In order to determine the accessibility of polling places, the following criteria was taken into account:

- Level access at entrance to and within the polling place (or space for a temporary ramp)
- Wide enough doorways and corridors
- Sufficient space within the polling place to enable motorised wheelchair manoeuvrability

The Electoral Commission guidance (Appendix 8) provides further information on considering accessibility issues.

45. Groups and individuals with expertise in the Enfield area and the staff Disability Working Group were invited to respond to the ARO's representations in the public consultation.

46. To ensure the consultation was accessible to those whose first language is not English, adverts were placed in foreign language newspapers. The Enfield Council website has a built-in translator tool which enabled visitors to translate the Polling District & Polling Place Review webpage.

47. A detailed Equality Impact Assessment (EqIA) (Appendix 6) has been developed alongside the review in order to assess its impact on each protected characteristic.

48. The EqIA reinforced that access requirements for elderly and disabled electors have been taken into account when devising the polling district and polling place scheme. The EqIA also highlighted that public transport accessibility data was considered to cater for the needs of electors without access to a private transport.

49. The EqIA concludes that the use of schools as polling places can have a negative impact on young people of school age (4-18). The EqIA also

concludes that the use of religious buildings as polling places may discourage other faith groups from voting. Due to the requirement to provide polling places in a specified area (a polling district) and the requirement to make them accessible to all, it is often not possible to secure the use of an alternative facility.

Environmental and Climate Change Considerations

50. None

Risks that may arise if the proposed decision and related work is not taken

51. Reputational risk for the Council and Returning Officer if the review was not completed prior to the LB Enfield election to be held in May 2022.

Risks that may arise if the proposed decision is taken and actions that will be taken to manage these risks

52. There is a risk that electors whose polling place has changed may be unsure where they should go to vote at the next election in May 2022. To minimise the risk, the Electoral Registration Officer and Returning Officer will run an additional information campaign prior to the May elections to remind electors that their polling place may have changed through the following channels:

- Housing Notification Letters (HNLs)
- Poll card inserts
- Enfield Council website
- Social media campaign.

Financial Implications

53. A one-off allocation of £150k from contingent items has been agreed to fund the polling district and polling place review.

54. Any proposed increased number of temporary units and the movement away from public funded schools will increase the venue hire costs at future elections. The proposals set out in Appendix 1 recommend an additional 6 temporary units. The additional cost for the hire of these temporary units is estimated at around £15,600.

Legal Implications (Jeremy Chambers)

55. All relevant legal matters are addressed in the body of the report.

Workforce Implications

56. Additional one-off resources have been allocated to the Director of Law and Governance to undertake this project.

57. The recruitment and engagement of additional polling staff may be required at May 2022 elections. The responsibility for staffing polling stations lies with the Returning Officer for each electoral event. Increased levels of postal voting may negate the need for additional staff at polling stations.

Property Implications

58. None

Other Implications

59. None

Options Considered

60. None

Conclusions

61. The LGBCE Order for the London Borough of Enfield Electoral Review requires the realignment of the polling districts through a Polling District and Polling Place Review in preparation for the May 2022 elections. Compliance with the Electoral Commission guidance minimises the risk of appeal of the Council's decision.

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Date of report: 17 November 2021

Appendices

Appendix 1: Polling district and polling place scheme 2022

Appendix 2: Polling scheme 2022 (Map of full borough)

Appendix 3: Estimated in-person electorate figures (November 2021)

Appendix 4: List of consultees

Appendix 5: Summary of representations received in the polling district and polling place review consultation

Appendix 6: Equality Impact Assessment (EqIA) – Polling District and Polling Place Review 2021

Background Papers

The following documents have been relied on in the preparation of this report:

Electoral Commission, Reviews of polling districts, polling places and polling stations

https://www.electoralcommission.org.uk/sites/default/files/word_doc/Polling-district-review-guidance.doc

(Acting) Returning Officer's Representations (published 5 August 2021)

<http://governance.enfield.gov.uk/documents/s89481/Appendix%207%20-%20Acting%20Returning%20Officers%20Representations%205%20August%202021%20-%20MM.pdf>

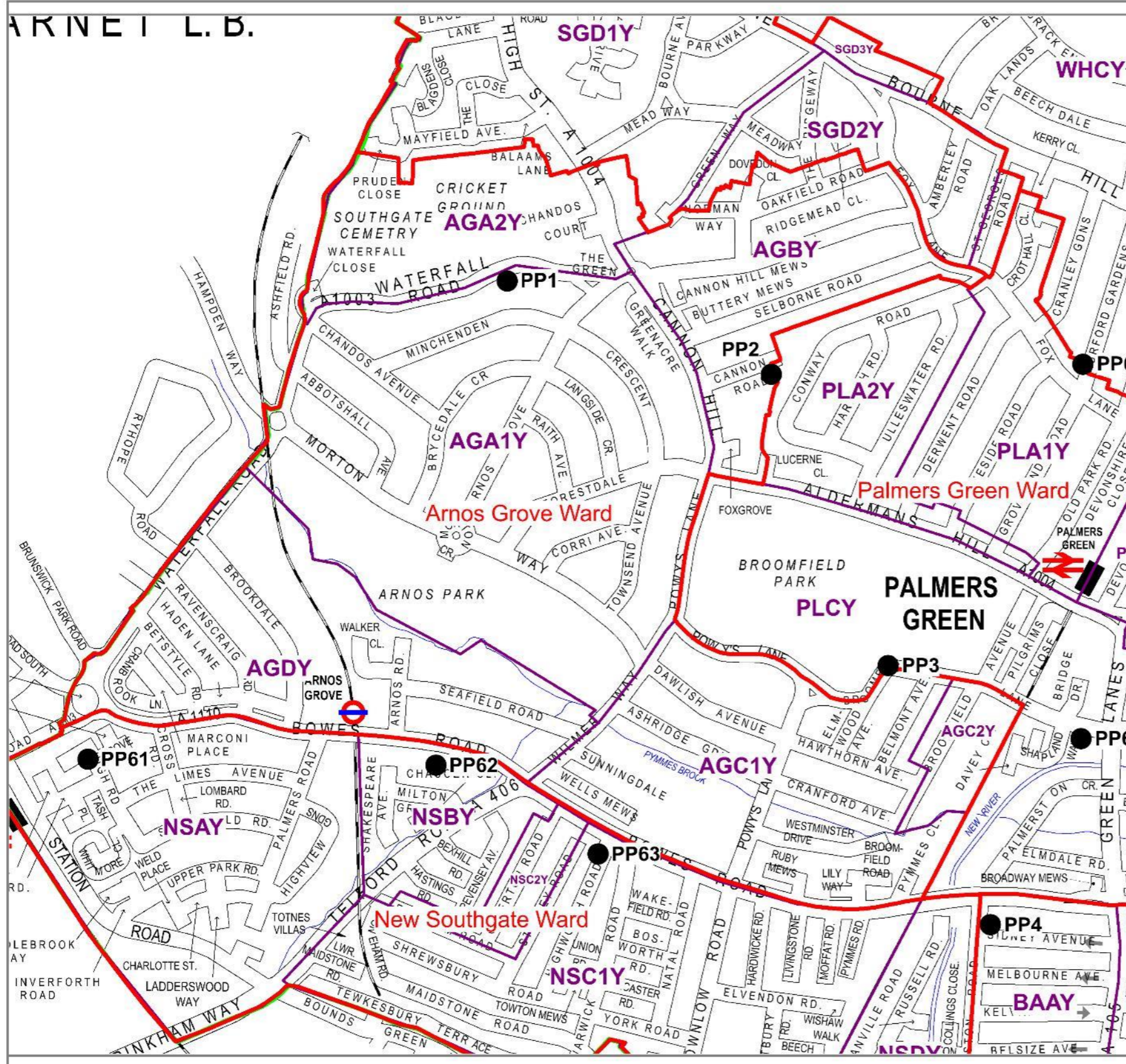
Appendix 1: Polling district and polling place scheme 2022

Following the General Purposes Committee meeting on 14 October 2021, extensive cross checking of the boundary maps and the property database has taken place. Minor alterations of the boundary lines have been actioned to move the polling district boundaries along the property boundary where possible.

The cross checking identified the following minor anomalies where properties on the same street were voting at different polling places. The alterations are listed here:

Original Proposed Polling District	New Proposed Polling District	Location	Justification
BDDX	BDBX	2A Leyland Avenue	Adjustment to vote with the rest of the street.
BDDX	BDCX	1 – 11 Saville Row	Saville Row exits to Green Street between no 130 and 148. Adjustment to vote with neighbouring properties on Green Street.
BPBZ	BPFZ	25, 27 and The Beehive, Little Bury Street	Adjustment to vote with the rest of the street.
CFCY	CFBY	Front Park, Trent Lodge	Front Lodge exits onto Cockfosters Road. This alteration will shorten the journey to the polling station.
ELC1X	ELDX	109a Raynton Road	Adjustment to vote with the rest of the street.
GPDY	GPBY	2a The Orchard	Adjustment to vote with the rest of the street.
HBDZ	HBCZ	3 Tuncombe Road	Adjustment to vote with the rest of the street.
RWDX	RWEX	1- 6 Bryon Court	Adjustment to vote with the rest of the street.
SGC1Y	SGBY	171 The Vale	Adjustment to vote with the rest of the street.

Arnos Grove Ward - Polling Scheme 2022



Map Ref	Location of proposed Polling Place
PP1	Christ Church Southgate
PP2	St. Monica's Scout and Guide Headquarters
PP3	Temporary Building (Broomfield Park)
PP62	Bowes Road Library

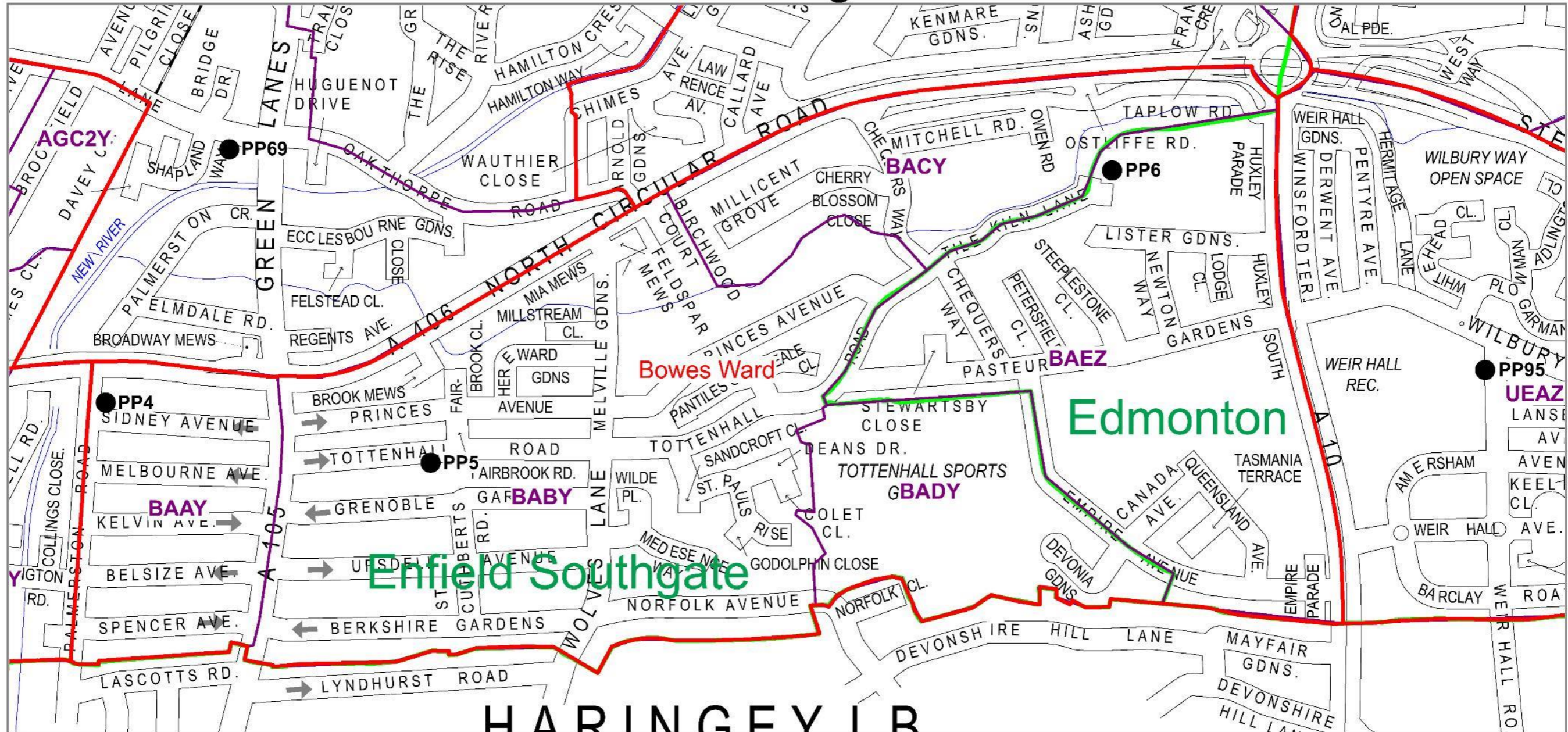
Key	
	2022 Ward Boundary
	2010 Constituency Boundary
	Proposed Polling District boundary
	Proposed Polling Place

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Arnos Grove – 2 councillors

Polling district	Parliamentary constituency	Proposed polling district	Polling place	Justification	Included for information purposes only		
					No. of polling stations	Estimated in-person electors	Disabled access at polling place
AGA1Y	Enfield Southgate	The proposal is to follow the existing (2021) polling district boundaries.	Christ Church Southgate, The Green	No amendments suggested. The B1452 Cannon Hill creates a boundary between the east and the west of the ward. Arnos Park separates the polling district from the south of the ward. No negative feedback reported from use of polling place at May 2021 elections.	1	1,525	Yes
AGA2Y	Enfield Southgate	The proposal is to follow the existing (2021) polling district boundaries.		This area is currently in a different ward to AGA1Y. It will therefore require a separate register until the May 2022 elections. Electors in this area have traditionally voted at Southgate Methodist Church Hall which is outside the ward boundaries. The proposed polling place is conveniently located for the electors.			
AGBY	Enfield Southgate	The proposal is to maintain the A1004 Cannon Hill as the western polling district boundary and follow the new ward boundaries.	St. Monica's Scout and Guide Headquarters, Cannon Road	Cannon Hill creates a boundary between the east and the west of the ward. No amendments suggested to polling place. No negative feedback reported from use of polling place at May 2021 elections.	1	817	Temporary ramp required
AGC1Y	Enfield Southgate	The proposal is to follow the existing (2021) polling district boundaries and new ward boundaries.	Temporary Unit (Broomfield Park)	No amendments suggested to polling district boundaries. Wilmer Way creates a boundary between the east and the west of the ward. Electors in this area have traditionally voted at Palmers Green Library which is situated in Palmers Green Ward. The proposal is to install a temporary unit in Broomfield Park as this would provide more convenient access for these electors.	1	1,294	Yes
AGC2Y	Enfield Southgate	The proposal is to follow the existing (2021) polling district boundaries and new ward boundaries.		This area is currently in a different ward to AGC1Y. It will therefore require a separate register until the May 2022 elections. No amendments suggested to polling place.			
AGDY	Enfield Southgate	The proposal is to follow the existing (2021) polling district boundaries and new ward boundaries.	Bowes Road Library, Bowes Road	No amendments suggested to polling district. Arnos Park separates the south easterly electors from those north of the park. Transport links and facilities are located at the south of the polling district around the A110. Electors in this area have traditionally voted at Bowes Road Library which is situated in New Southgate Ward. Alternative locations within the polling district boundaries for temporary units were considered unsuitable. The polling place will have two polling stations serving two wards.	1	804	Temporary ramp required

Bowes Ward - Polling Scheme 2022



Map Ref	Location of proposed Polling Place
PP4	Trinity at Bowes Methodist Church Hall
PP5	Tottenham Infants School
PP6	Wilkinson Hall



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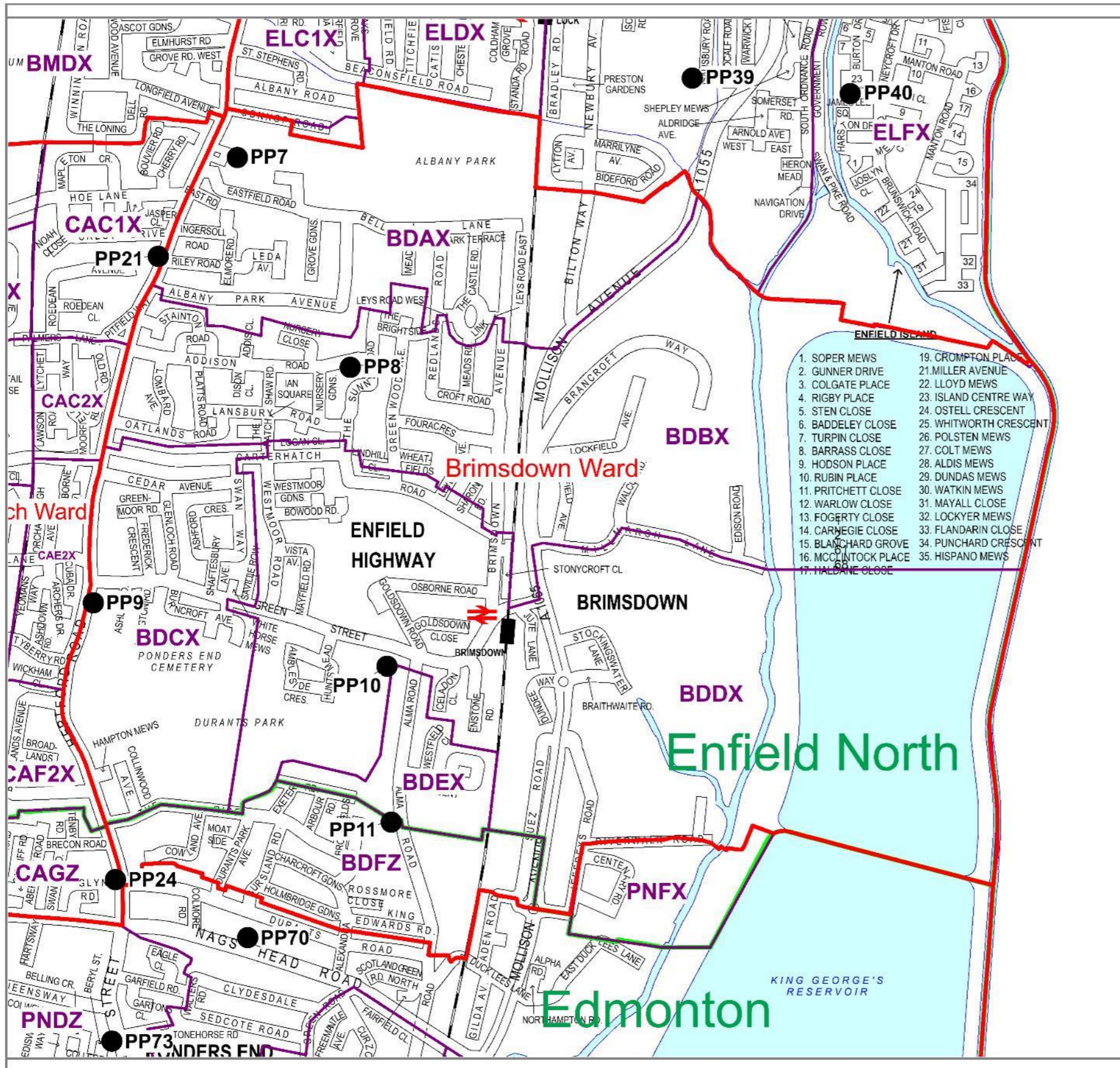
Key

- ▬ 2022 Ward Boundary
- ▬ 2010 Constituency Boundary
- ▬ Proposed Polling District boundary
- Proposed Polling Place

Bowes – 2 councillors

Polling district	Parliamentary constituency	Proposed polling district	Polling place	Justification	Included for information purposes only		
					No. of polling stations	Estimated in-person electors	Disabled access at polling place
BAAY	Enfield Southgate	The proposal is to follow the A105 and new ward boundaries.	Trinity at Bowes Methodist Church Hall, Palmerston Road	<p>The A105 has been recognised previously as a boundary and a polling place provided for electors to the west of the road.</p> <p>No amendments suggested to polling place. No negative feedback reported from use of polling place at May 2021 elections. The polling place will have two polling stations serving two wards.</p>	1 Note: Additional polling station at the venue for New Southgate Ward	927	Yes
BABY	Enfield Southgate	The proposal is to follow the existing (2021) polling district boundaries.	Tottenham Infants School, Tottenham Road	<p>No amendments suggested. There are limited suitable venues for polling for the properties located between the A105 and the A10. Electors have traditionally been divided between only two locations - Tottenham Infants School and Wilkinson Hall. There have been no suggestions to change the division boundary. Alternative locations within the polling district boundaries for temporary units were considered unsuitable.</p> <p>No negative feedback reported from use of polling place at May 2021 elections. No suitable alternatives premises have been identified. As the polling place electorate is above 2,500 two polling stations are recommended.</p>	2	2,646	Yes
BACY	Enfield Southgate	The proposal is to follow the existing (2021) polling district boundaries.	Wilkinson Hall, Tile Kiln Lane	<p>BACY and BADY were previously one polling district. It is recommended they are split into two separate polling districts as they are geographically separate.</p>	2 (one for BACY and BADY and one for BAEZ)	652	Temporary ramp required
BADY	Enfield Southgate	The proposal is to follow the existing (2021) polling district boundaries.		<p>There are limited suitable venues for polling for the properties located between the A105 and the A10. Electors have traditionally been divided between only two locations, Tottenham Infants School and Wilkinson Hall. There have been no suggestions to change the division boundary. Alternative locations within the polling district boundaries for temporary units were considered unsuitable.</p> <p>No amendments suggested to polling place. No negative feedback reported from use of polling place at May 2021 elections.</p>			
BAEZ	Edmonton	The proposal is to follow the existing (2021) polling district boundaries.		<p>This polling district is in a different parliamentary constituency (Edmonton) to the rest of Bowes Ward (Enfield Southgate) and therefore requires a separate polling district and station.</p> <p>There are limited suitable venues for polling for the properties located between the A105 and the A10. Electors have traditionally been divided between only two locations, Tottenham Infants School and Wilkinson Hall. There have been no suggestions to change the division boundary. Alternative locations within the polling district boundaries for temporary units were considered unsuitable.</p> <p>No amendments suggested to polling place.</p>			

Brimsdown Ward - Polling Scheme 2022



Map Ref	Location of proposed Polling Place
PP7	St. Hellier Hall
PP8	St. Barnabas Hall
PP9	Enfield Highway Community Centre
PP10	Brimsdown Primary School
PP11	28th Enfield Scout Hut

Key

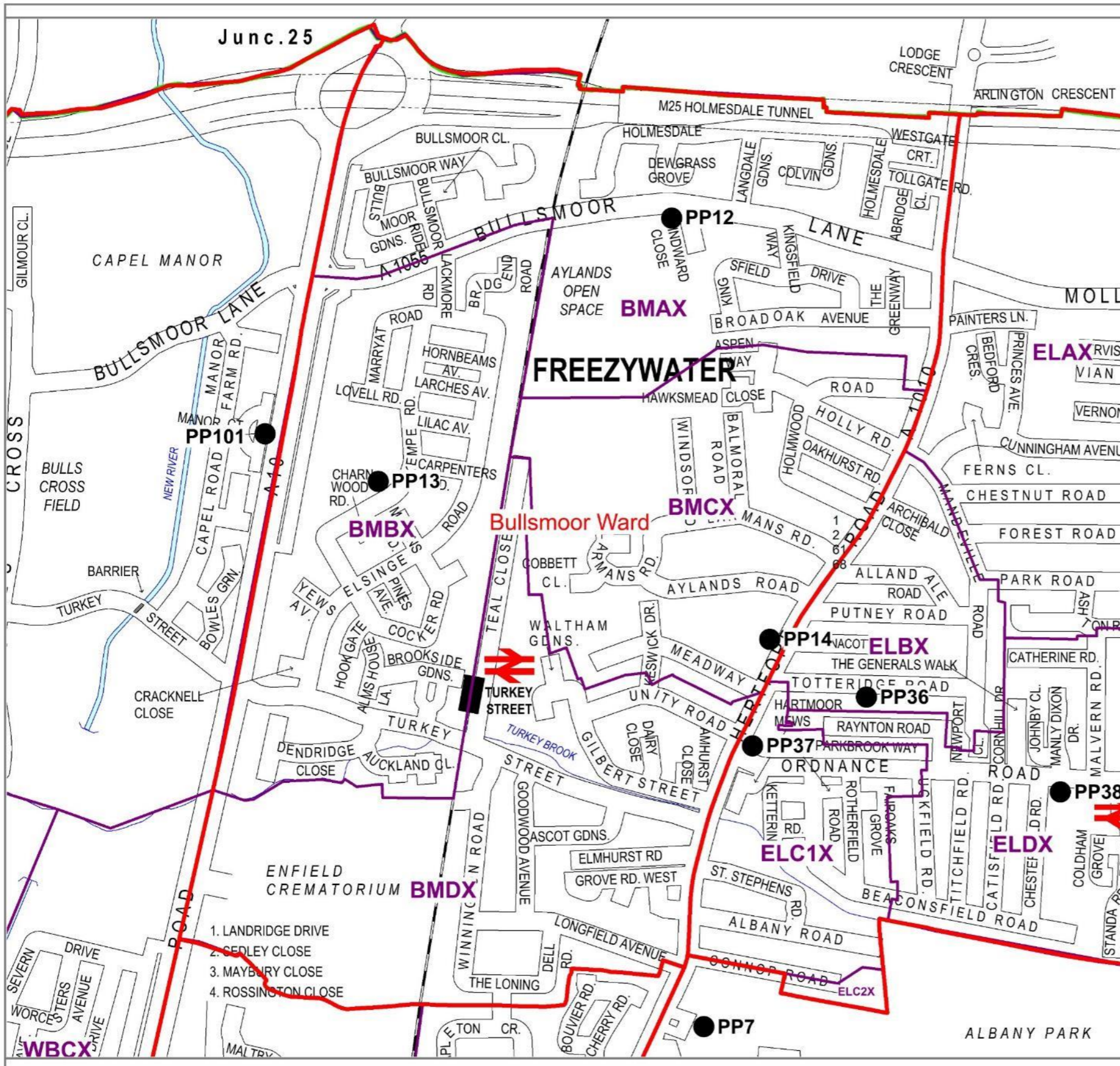
- ▬ 2022 Ward Boundary
- ▬ 2010 Constituency Boundary
- ▬ Proposed Polling District boundary
- Proposed Polling Place

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Brimsdown – 3 councillors

Polling district	Parliamentary constituency	Proposed polling district	Polling place	Justification	Included for information purposes only		
					No. of polling stations	Estimated in-person electors	Disabled access at polling place
BDAX	Enfield North	The proposal is to follow the existing (2021) polling district boundaries.	St. Hellier Hall, Eastfield Road	No amendments recommended. Residential properties are predominantly located to the west of the railway line. Hertford Road at the east of the ward provides transport links and facilities. The LGBCE changes have not affected this polling district and the current boundaries remain appropriate. No negative feedback reported from use at May 2021 elections.	1	1,515	Yes
BDBX	Enfield North	The proposal is to follow the existing (2021) polling district boundaries.	St. Barnabas Hall, Addison Road	No amendments recommended. Residential properties are predominantly located to the west of the railway line. Hertford Road at the east of the ward provides transport links and facilities. The LGBCE changes have not affected this polling district and the current boundaries remain appropriate. No negative feedback reported from use at May 2021 elections.	1	2,188	Yes
BDCX	Enfield North	The proposal is to follow the existing (2021) polling district boundaries.	Enfield Highway Community Centre, Hertford Road	No amendments recommended. The area from Carterhatch Road to the south of the ward boundary has three suitable polling venues. The LGBCE changes have not affected this polling district and the current boundaries remain appropriate. No negative feedback reported from use at May 2021 elections.	1	1,206	Yes
BDDX	Enfield North	The proposal is to follow the existing (2021) polling district boundaries.	Brimsdown Primary School, Green Street	No amendments recommended. The area from Carterhatch Road to the south of the ward boundary has three suitable polling venues. The LGBCE changes have not affected this polling district and the current boundaries remain appropriate. No negative feedback reported from use at May 2021 elections. No suitable alternative premises have been identified.	1	1,787	Yes
BDEX	Enfield North	The proposal is to follow the existing (2021) polling district boundaries.	28 th Enfield Scout Hut, Alma Road	No amendments recommended. The area from Carterhatch Road to the south of the ward boundary has three suitable polling venues. The LGBCE changes have not affected this polling district and the current boundaries remain appropriate. No negative feedback reported from use at May 2021 elections.	2 (one for BDEX and one for BDFZ)	593	Yes
BDFZ	Edmonton	The proposal is to follow the UK parliamentary constituency boundary and new ward boundaries.		This area is in a different parliamentary constituency (Edmonton) to the rest of Brimsdown Ward (Enfield North) and therefore requires a separate polling district. Electors in this area used to vote at The Royal British Legion which is situated in Ponders End Ward. The proposed polling place is conveniently located for electors in this polling district.		891	

Bullsmoor Ward - Polling Scheme 2022



Map Ref	Location of proposed Polling Place
PP12	Temporary Building (Lea Valley Academy)
PP13	Kempe Hall
PP14	St. George's Church
PP37	Ordnance Unity Centre Library

Key

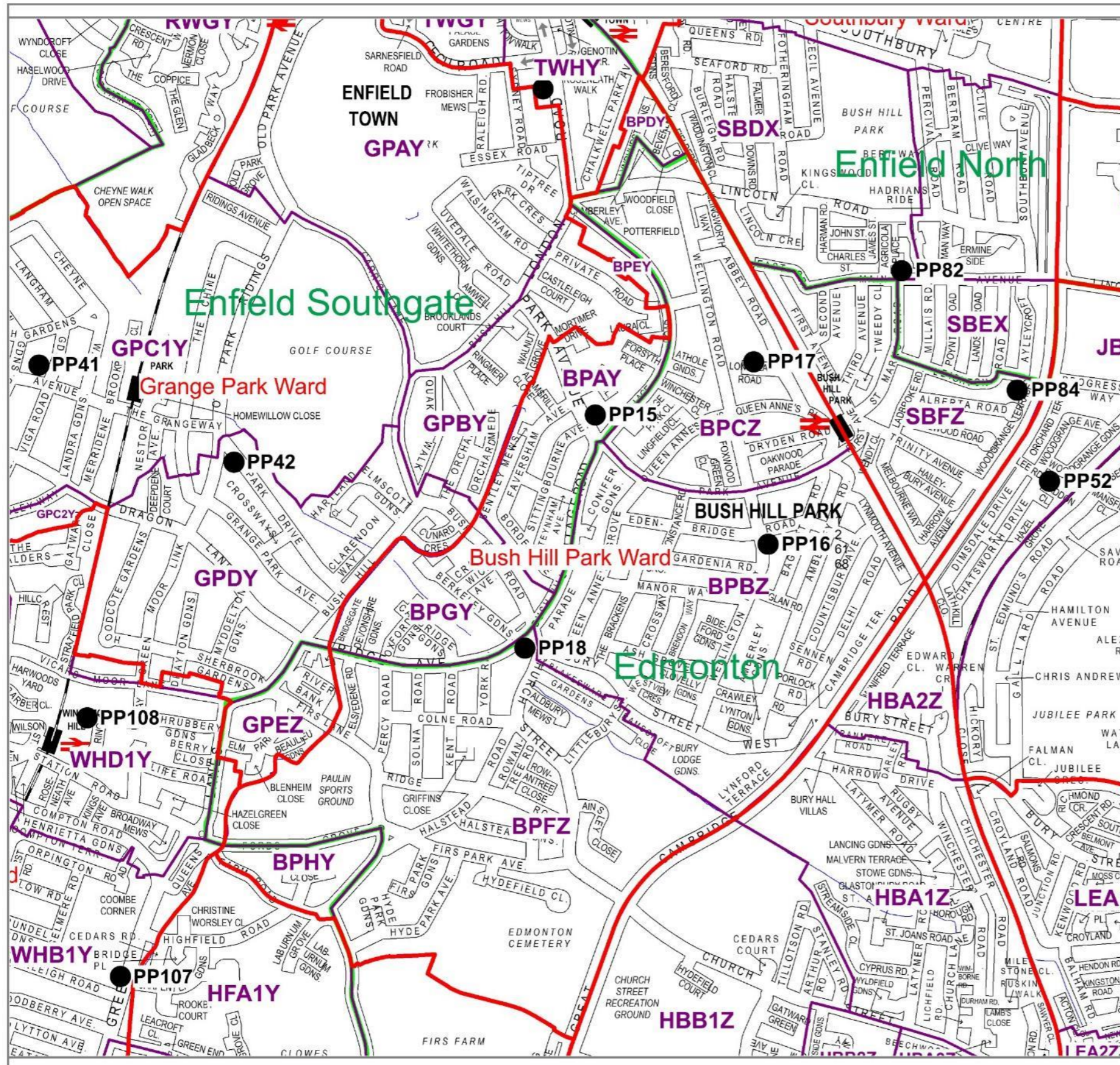
- 2022 Ward Boundary
- 2010 Constituency Boundary
- Proposed Polling District boundary
- Proposed Polling Place

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Bullsmoor – 2 councillors

Polling district	Parliamentary constituency	Proposed polling district	Polling place	Justification	Included for information purposes only		
					No. of polling stations	Estimated in-person electors	Disabled access at polling place
BMAX	Enfield North	The proposal is to follow the existing (2021) polling district boundaries.	Temporary Building (Lea Valley Academy), Bullsmoor Lane	No amendments suggested. The LGBCE changes have not affected this polling district and the current boundaries remain appropriate. Negative feedback was reported at the May 2021 elections regarding width of the doorways of the temporary unit. No suitable alternative premises have been identified.	1	1,303	Yes
BMBX	Enfield North	The proposal is to use the A1055 as the northern polling district boundary, then follow the railway line and new ward boundaries.	Kempe Hall, Kempe Road	The railway line creates a boundary and there are limited crossing points. Kempe Hall was unavailable at the May 2021 elections due to its use as a Covid-19 testing centre. The replacement venue was Bullsmoor Library which is situated next door. The proposal is to return to the use of Kempe Hall as this venue offers better facilities for voting.	1	1,694	Yes
BMCX	Enfield North	The proposal is to follow the existing polling district boundaries with the exclusion of properties moved to BMDX. Please consult the map for further details.	St. George's Church, Hertford Road	The railway line creates a boundary and there are limited crossing points. The proposal is to move to St. George's Church which is situated near to the current (2021) polling place. This will eliminate the need for Freezywater CE VA Primary School and the disruption to pupils, parents and teachers.	1	1,351	Yes
BMDX	Enfield North	The proposal is to follow the existing polling district boundaries and the new ward boundaries with the inclusion of properties on Teal Close, Gilbert Street, Dairy Close, Amhurst Close, Meadway, Waltham Gardens, Unity Road and Keswick Drive (partial). Please consult the map for further details.	Ordnance Unity Centre Library, Hertford Road	Electors in this area have traditionally voted at Freezywater CE VA Primary School or The Dharma Centre. The Dharma Centre is located outside the ward boundaries. Ordnance Unity Centre Library is more conveniently located and at a closer distance for these electors as they have easy access across Hertford Road.	1 Note: Additional polling station at venue for Enfield Lock Ward	1,381	Yes

Bush Hill Park Ward - Polling Scheme 2022



Map Ref	Location of proposed Polling Place
PP15	St. Stephen's Hall
PP16	Bush Hill Park Methodist Church Hall
PP17	Bush Hill Park Bowls, Tennis & Social Club
PP18	Ridge Avenue Library

Key

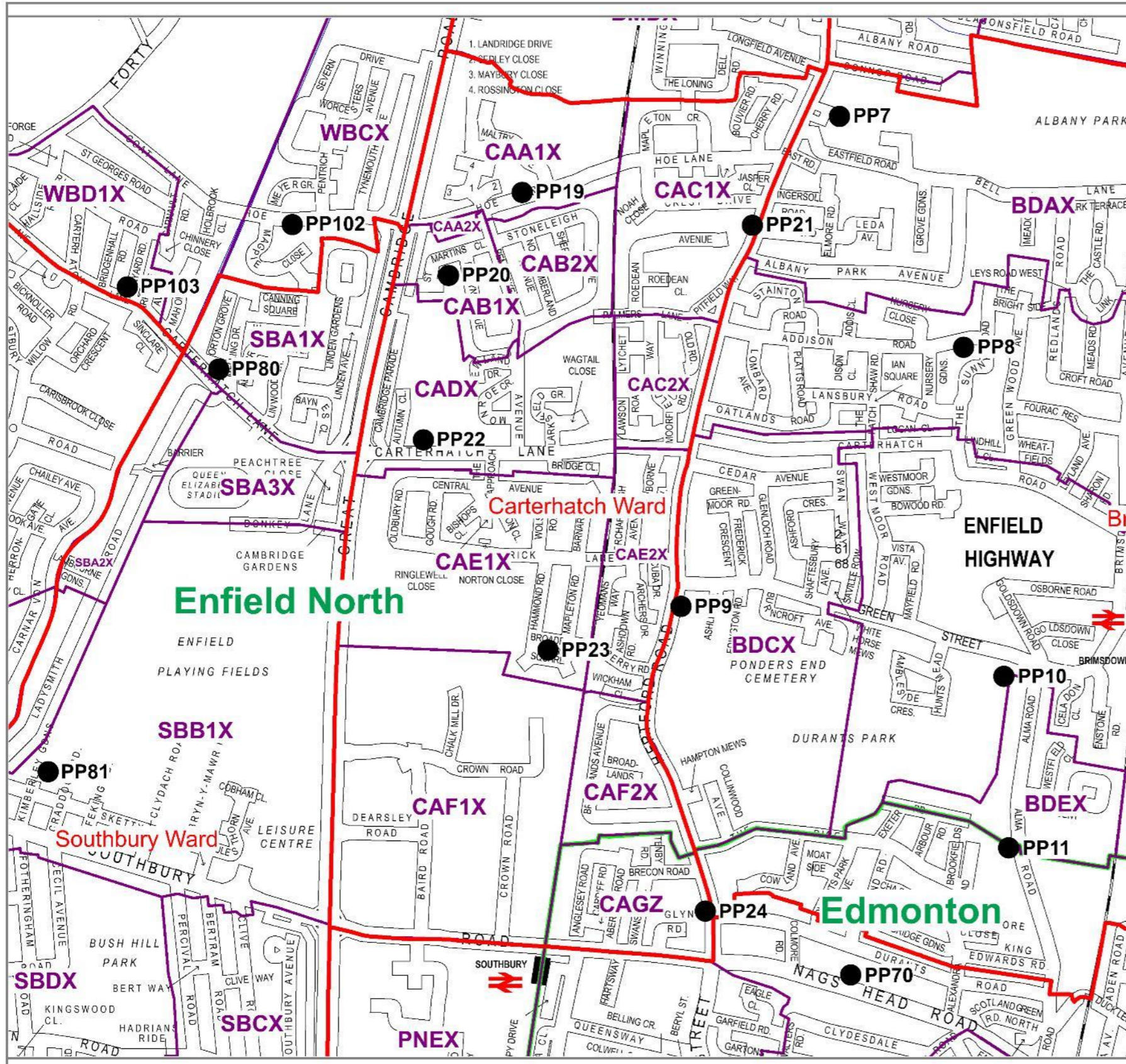
- 2022 Ward Boundary
- 2010 Constituency Boundary
- Proposed Polling District boundary
- Proposed Polling Place

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Bush Hill Park – 3 councillors

Polling district	Parliamentary constituency	Proposed polling district	Polling place	Justification	<i>Included for information purposes only</i>		
					No. of polling stations	Estimated in-person electors	Disabled access at polling place
BPAY	Enfield Southgate	The proposal is to follow the existing (2021) polling district boundaries and new ward boundaries.	St. Stephen's Hall, Park Avenue	The LGBCE changes have not affected this polling district and the current boundaries remain appropriate. No amendments suggested to polling place. No negative feedback reported from use of polling place at May 2021 elections.	1 Note: Additional polling station at the venue for Grange Park Ward	631	Yes
BPBZ	Edmonton	The proposal is to follow the existing (2021) polling district boundaries.	Bush Hill Park Methodist Church Hall, Wellington Road	No amendments suggested. The LGBCE changes have not affected this polling district and the current boundaries remain appropriate. No negative feedback reported from use of polling place at May 2021 elections. As the polling place electorate is above 2,500 two polling stations are recommended.	1	2,434	Temporary ramp required
BPCZ	Edmonton	The proposal is to follow the existing (2021) polling district boundaries.	Bush Hill Park Bowls, Tennis & Social Club, Abbey Road	No amendments suggested. This area is in a different parliamentary constituency (Edmonton) to BPDY and BPEY and therefore requires a separate polling district and station. No negative feedback reported from use of polling place at May 2021 elections.	2 (one for BPCZ and one for BPDY and BPEY)	1,156	Yes
BPDY	Enfield Southgate	The proposal is to follow the parliamentary constituency boundary and new ward boundaries.		These areas are in a different parliamentary constituency (Enfield Southgate) to BPCZ (Edmonton) and therefore require a separate polling district and station.			
BPEY	Enfield Southgate	The proposal is to follow the parliamentary constituency boundary and new ward boundaries.		Although the areas are currently in the same ward, they have been split by the new ward boundary so two separate polling districts are recommended as they lack a geographic connection.			
BPFZ	Edmonton	The proposal is to follow the existing (2021) polling district boundaries and new ward boundaries.	Ridge Avenue Library, Ridge Avenue	The LGBCE changes have made minimal amendments to the polling district and the current boundaries remain appropriate. No amendments recommended to polling place. No negative feedback reported from use of polling place at May 2021 elections.	2 (one for BPFY and BPHY and one for BPGZ)	2,016	Yes
BPGY	Enfield Southgate	The proposal is to follow the existing (2021) polling district boundaries and new ward boundaries.		This area is in a different parliamentary constituency (Enfield Southgate) to BPFZ (Edmonton) and therefore requires a separate polling district. There is no geographic link between BPHY and BPGY to create one polling district. No amendments suggested to the polling place.			
BPHY	Enfield Southgate	The proposal is to follow the existing (2021) polling district boundaries and new ward boundaries.		This area is in a separate parliamentary constituency (Enfield Southgate) to BPFZ (Edmonton) and different 2021 ward to BPHY therefore requires a separate polling district. Electors in this area traditionally voted at Holy Trinity Church Hall which is outside the ward boundaries. There is no suitable alternative within this polling district.			

Carterhatch Ward - Polling Scheme 2022



Map Ref **Location of proposed Polling Place**

PP19	Temporary Building (Hoe Lane Space)
PP20	Boleyn Hall
PP21	The Dharma Centre
PP22	Carterhatch Infant School
PP23	Temporary Building (Broadfield Square)
PP24	Ponders End Methodist Church Hall

Key

- ▬ 2022 Ward Boundary
- ▬ 2010 Constituency Boundary
- ▬ Proposed Polling District boundary
- Proposed Polling Place

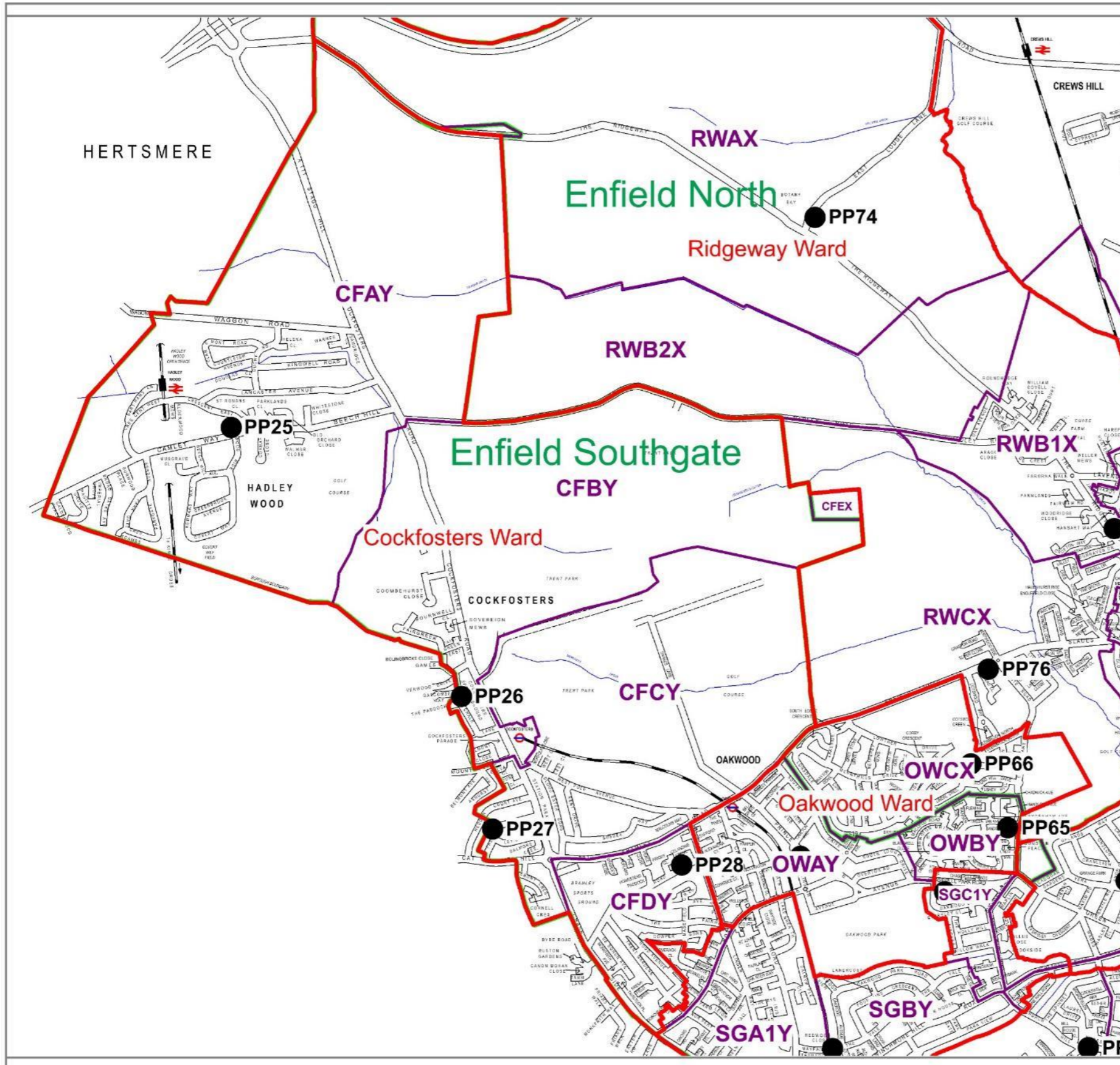
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Carterhatch – 2 councillors

Polling district	Parliamentary constituency	Proposed polling district	Polling place	Justification	Included for information purposes only		
					No. of polling stations	Estimated in-person electors	Disabled access at polling place
CAA1X	Enfield North	The proposal is use the railway line as the eastern polling district boundary, the new ward boundaries as the northern and western polling district boundary and then to follow the properties along Hoe Lane. Please consult map for further details.	Temporary Building (Hoe Lane Open Space), Hoe Lane	The railway creates a boundary and there are limited crossing points to the previous polling place (The Dharma Centre). The lack of suitable venues to the west of the railway requires the siting of a temporary unit on Hoe Lane which is centrally located.	1	448	Yes
CAA2X	Enfield North	The proposal is to create a new polling district comprised of the following properties: 176-204 Hoe Lane.		This area is currently in a different ward to CAA1X. It therefore requires a separate register until the May 2022 elections. Electors in this area traditionally voted at Carterhatch Infant School. A temporary building on Hoe Lane Open Space is more conveniently located for these electors as front onto Hoe Lane.			
CAB1X	Enfield North	The proposal is to create a new polling district comprised of properties on Boleyn Avenue, St Martin's Close, the western side of Pembroke Avenue and 980-1014 Great Cambridge Road.	Boleyn Hall, Boleyn Avenue	Electors in this area traditionally voted at Carterhatch Infant School. Boleyn Hall is more conveniently located for the electors and at a shorter distance.	1	728	Yes
CAB2X	Enfield North	The proposal is to create a new polling district comprised of properties on Stoneleigh Avenue, Northumberland Avenue, the eastern side of Pembroke Avenue and Sheppard Close.		This area is currently in a different ward to CAB1X. It will therefore require a separate register until the May 2022 elections. Electors in this area traditionally voted at The Dharma Centre. Boleyn Hall is more conveniently located for the electors as they have access via Stoneleigh Avenue/St Martin's Close.			
CAC1X	Enfield North	The proposal is to follow the railway line, the existing polling district boundary and new ward boundaries. Please consult map for further details.	The Dharma Centre, Hertford Road	The railway line creates a boundary between the east and west of the ward and there are limited crossing points. No amendments proposed to polling place. No negative feedback reported from use of polling place at May 2021 elections.	1	1,567	Temporary ramp required
CAC2X	Enfield North	The proposal is to follow the railway line, Palmers Lane, the new ward boundary and Carterhatch Lane. Please consult the map for further details.		This area is currently in a separate ward to CAB2X. It will therefore require a separate register until the May 2022 elections. Electors in this area traditionally voted at Carterhatch Infant School. The Dharma Centre is more conveniently located for the electors as they have access on to Hertford Road via Palmers Lane/Pitfield Way.			
CADX	Enfield North	The proposal is to follow the railway line and the existing (2021) polling district boundaries.	Carterhatch Infant School, Carterhatch Lane	The proposed polling district boundaries will reduce the number of electors in the polling district. There are problems with congestion on Carterhatch Lane around the school. Reducing the number of electors at Carterhatch Infant School will help to reduce congestion levels. No amendments suggested to polling place. No negative feedback reported from use of polling place at May 2021 elections. No suitable alternatives have been identified.	1	564	Yes

Polling district	Parliamentary constituency	Proposed polling district	Polling place	Justification	Included for information purposes only		
					No. of polling stations	Estimated in-person electors	Disabled access at polling place
CAE1X	Enfield North	The proposal is to follow the existing (2021) polling district boundaries and new ward boundary.	Temporary Building (Broadfield Square)	Brick Lane is a connecting road which runs through the polling district. Electors in this area traditionally voted at Suffolks Primary School. Negative feedback was reported on the length of the walk from the street to the polling place at the May 2021 elections. As a result of this feedback an alternative venue has been sought. No suitable permanent premises have been identified. It is therefore proposed that a temporary unit is placed on Broadfield Square.	1	1,372	Yes
CAE2X	Enfield North	The proposal is to follow the existing (2021) polling district boundaries with the exclusion of properties on Broadlands Avenue and Broadlands Close.		This area is currently in a separate ward to CAE1X. It will therefore require a separate register until the May 2022 elections. Electors in this area traditionally voted at Enfield Highway Community Centre which is outside the ward boundaries. The proposed polling place is conveniently located for electors in this area.			
CAF1X	Enfield North	The proposal is to follow the existing (2021) polling district boundaries and new ward boundary.	Ponders End Methodist Church (Wesley Hall), High Street	This area is predominantly industrial land with a small number of electors situated along Southbury Road. Electors in this area traditionally voted at Ellenborough Table Tennis Club which is outside the ward boundaries. The proposed polling place is a shorter distance than the current polling place. No negative feedback reported from use of polling place at May 2021 elections.	2 (one for CAE1X and CAE2X and one for CAFZ)	424	Temporary ramp required
CAF2X	Enfield North	The proposal is to create a new polling district comprising of properties on Broadlands Avenue and Broadlands Close.		This area is currently in a separate ward to CAF1X. It will therefore require a separate register until the May 2022 elections. Electors in this area traditionally voted at Enfield Highway Community Centre which is outside the ward boundaries. The proposed polling place is conveniently located for electors in this area as they exit onto Hertford Road.			
CAGZ	Edmonton	The proposal is to follow the existing (2021) polling district boundaries and new ward boundaries		This area is in a separate parliamentary constituency (Edmonton) to the rest of Carterhatch Ward (Enfield North) and therefore requires a separate polling district and station. No amendments proposed to polling place.			

Cockfosters Ward - Polling Scheme 2022



Map Ref	Location of proposed Polling Place
PP25	St. Paul's Church
PP26	Southgate Compton Cricket Club
PP27	Freston Hall
PP28	14th Southgate Scout Headquarters

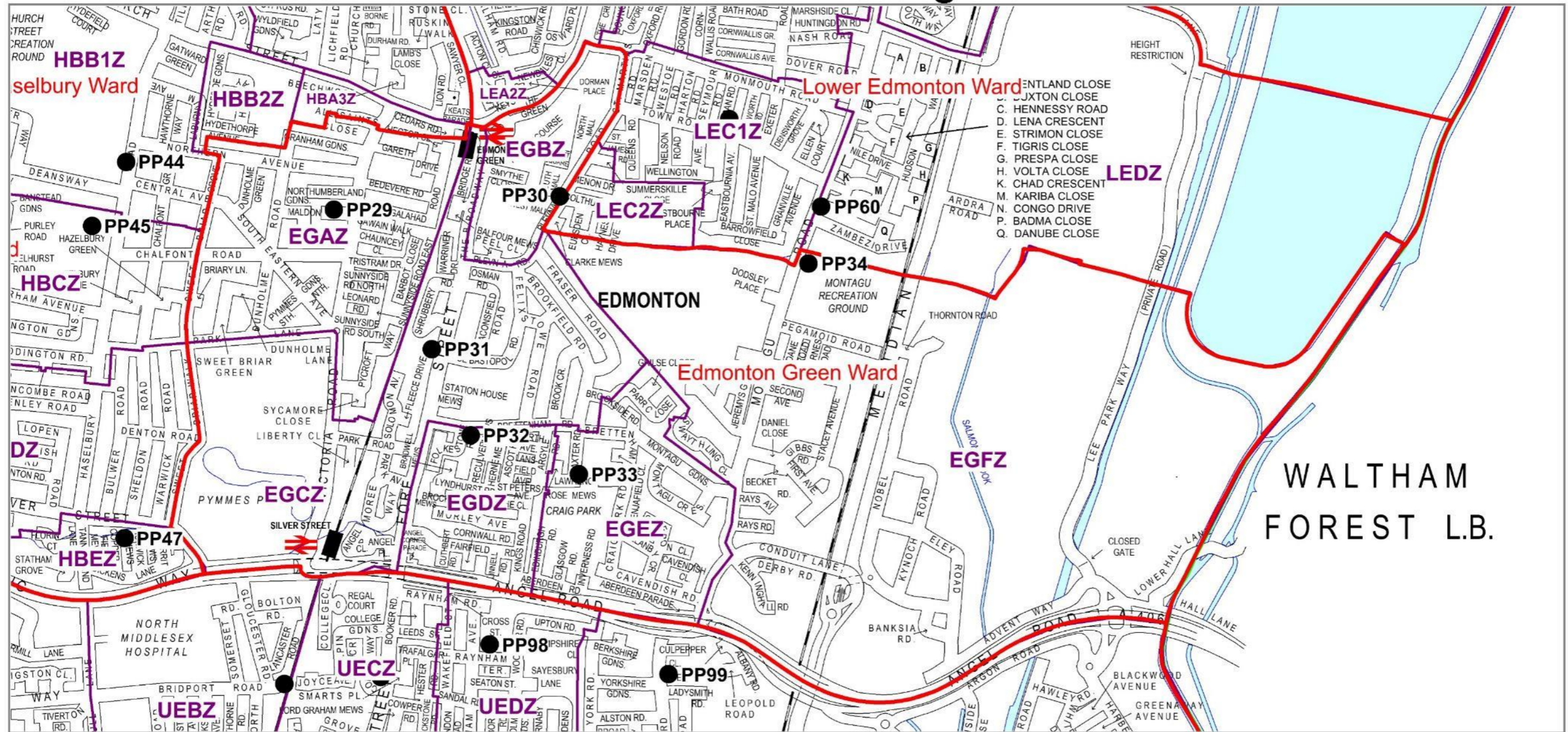
Key	
	2022 Ward Boundary
	2010 Constituency Boundary
	Proposed Polling District boundary
	Proposed Polling Place

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Cockfosters – 2 councillors

Polling district identifier	Parliamentary constituency	Proposed polling district	Polling place	Justification	<i>Included for information purposes only</i>		
					No. of polling stations	Estimated in-person electors	Disabled access at polling place
CFAY	Enfield Southgate	The proposal is to follow the existing (2021) polling district boundaries.	St. Paul's Church, Camlet Way	No amendments suggested. Hadley Wood has a distinct community identity. The LGBCCE changes have not affected this polling district and the current boundaries remain appropriate. No negative feedback reported from use of polling place at May 2021 elections.	1	1,573	Temporary ramp required
CFBY	Enfield Southgate	The proposal is to adjust the southern boundary of the polling district to accommodate new development	Southgate Compton Cricket Club, Chalk Lane	Consideration has been given to the development at Black Horse Tower. Southgate Compton Cricket Club is more conveniently located for these electors than Freston Hall. No amendments suggested to polling place. No negative feedback reported from use of polling place at May 2021 elections.	1	420	Temporary ramp required
CFEX	Enfield North	This is a small area with 0 electors.		This area is in a different parliamentary constituency (Enfield North) to the rest of Cockfosters Ward (Enfield Southgate) and therefore requires a separate polling district. There are currently no registered electors in this area.			
CFCY	Enfield Southgate	The proposal is to adjust the northern boundary of the polling district to accommodate new development and to adjust the southern boundary to include Bolingbroke Park, Ebony Crescent, Cornell Gardens.	Freston Hall, Freston Gardens	Consideration has been given to the development at Trent Park. The only vehicular access is via Snakes Lane exiting onto A110 Bramley Road. Freston Hall is more conveniently located and at a closer distance for electors on the Bolingbroke Park development as they have easy access across the A110 Bramley Road. No amendments suggested to polling place. No negative feedback reported from use of polling place at May 2021 elections.	1	1,576	Yes
CFDY	Enfield Southgate	The proposal is to maintain the A110 Bramley Road as the northern polling district boundary with the exception of properties on Bolingbroke Park, Ebony Crescent and Cornell Gardens and follow the new ward boundaries.	14 th Southgate Scout Headquarters, Green Road	The A110 Bramley Road is an arterial road which creates a boundary. No amendments suggested to polling place. No negative feedback reported from use of polling place at May 2021 elections.	1	1,689	Temporary ramp required

Edmonton Green Ward - Polling Scheme 2022



Map Ref	Location of proposed Polling Place
PP29	Memorial Hall
PP30	Green Towers Community Centre
PP31	Faith House (Edmonton United Reformed Church)
PP32	Brettenham School Nursery
PP33	Unity Hub @ Craig Park
PP34	Edmonton Eagles Amateur Boxing Club



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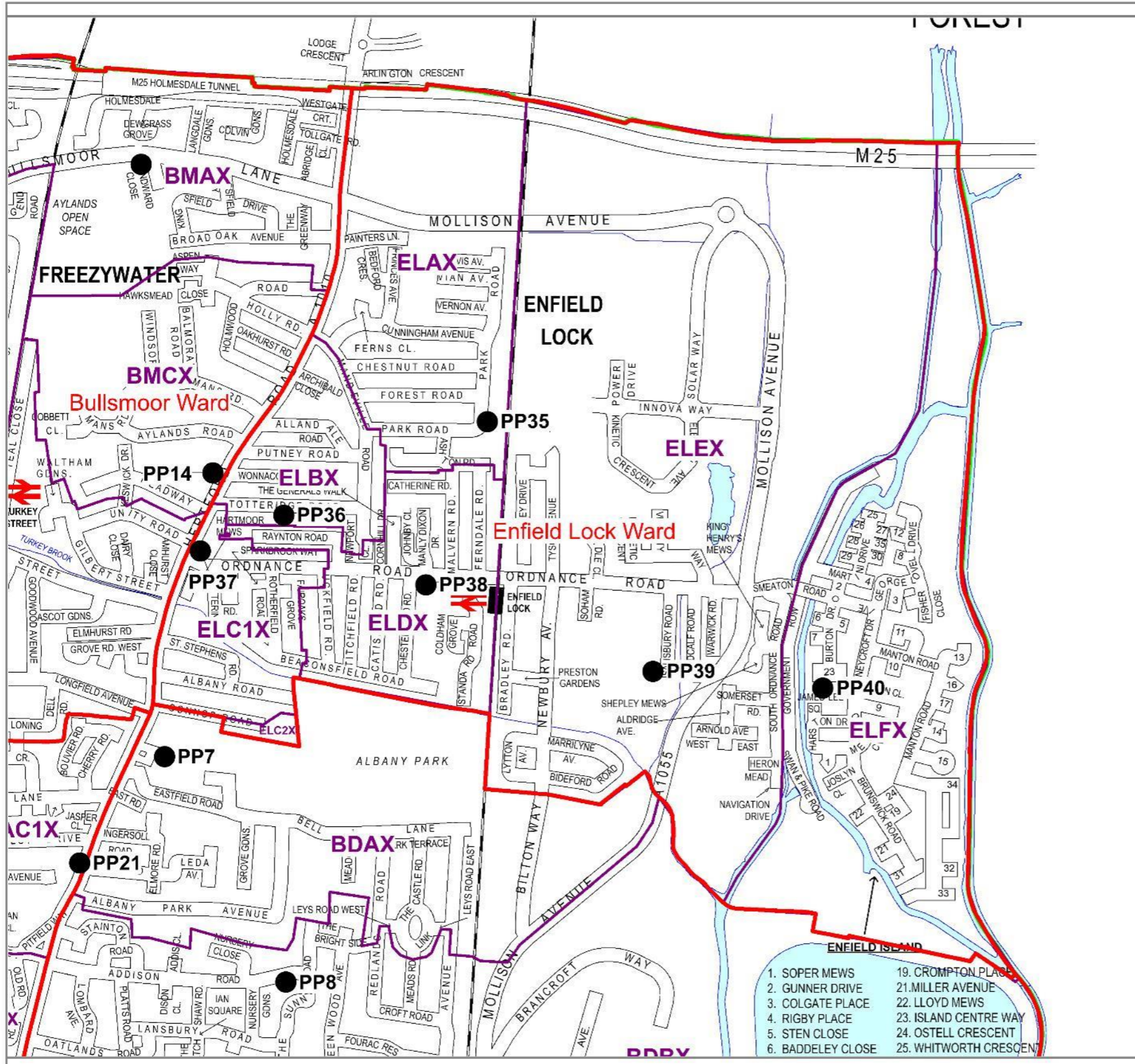
Key

- 2022 Ward Boundary
- 2010 Constituency Boundary
- Proposed Polling District boundary
- Proposed Polling Place

Edmonton Green – 3 councillors

Polling district identifier	Parliamentary constituency	Proposed polling district	Polling place	Justification	<i>Included for information purposes only</i>		
					No. of polling stations	Estimated in-person electors	Disabled access at polling place
EGAZ	Edmonton	The proposal is to amend the existing (2021) polling district boundaries to incorporate properties on Pycroft Way, Sycamore Close and some properties on Victoria Road as shown on the map.	Memorial Hall, Maldon Road	Electors on Pycroft Way and Victoria Road currently vote at Faith House which is situated on the other side of the railway track. Memorial Hall is more conveniently located for these electors. No amendments suggested to polling place. No negative feedback reported from use of polling place at May 2021 elections.	1	2,280	Yes
EGBZ	Edmonton	The proposal is to amend the existing (2021) polling district boundaries to incorporate properties on Bridge Road, Peel Close and the south side of The Broadway.	Green Towers Community Centre, Plevna Road	Electors on Bridge Road, Peel Close and the south side of The Broadway currently vote at Faith House. The community centre is more conveniently located for these electors. Green Towers Community Centre was unavailable at the May 2021 elections due to its use as a Covid-19 testing centre. The replacement venue was Edmonton Green Library. It is recommended that there is a return to the community centre as this venue offers better facilities for voting.	1	743	Yes
EGCZ	Edmonton	The proposal is to follow the existing (2021) polling district boundaries with the exception of the properties moved to EGAZ and EGBZ as shown on the map.	Faith House (Edmonton United Reformed Church), Fore Street	The polling district is dissected by Fore Street and the polling place provides a central location. No amendments suggested to polling place. No negative feedback reported from use of polling place at May 2021 elections.	1	2,053	Yes
EGDZ	Edmonton	The proposal is to follow the existing (2021) polling district boundaries.	Brettenham School Nursery, Brettenham Road	No amendments suggested. The LGBCE changes have not affected this polling district and the current boundaries remain appropriate. No negative feedback reported from use of polling place at May 2021 elections. No suitable alternative premises have been identified.	1	1,123	Yes
EGEZ	Edmonton	The proposal is to follow the existing polling district boundaries.	Unity Hub @ Craig Park, Lawrence Road	No amendments suggested. The LGBCE changes have not affected this polling district and the current boundaries remain appropriate. No negative feedback reported from use of polling place at May 2021 elections.	1	1,523	Yes
EGFZ	Edmonton	The proposal is to follow the existing (2021) polling district boundaries.	Edmonton Eagles Amateur Boxing Club, Montagu Recreation Ground	No amendments suggested. Properties in this area are concentrated along Montagu Road. The rest of the polling district is comprised mostly of industrial units. The properties are separated from the rest of the ward by the cemetery. The LGBCE changes have not affected this polling district and the current boundaries remain appropriate. No negative feedback reported from use of polling place at May 2021 elections.	1	649	Yes

Enfield Lock Ward - Polling Scheme 2022



Map Ref	Location of proposed Polling Place
PP35	Temporary Building (Park Road Flats)
PP36	Totteridge Road Baptist Church Hall
PP37	Ordnance Unity Centre Library
PP38	St. Peter and St. Paul Church Hall
PP39	Prince of Wales School
PP40	Enfield Island Community Centre

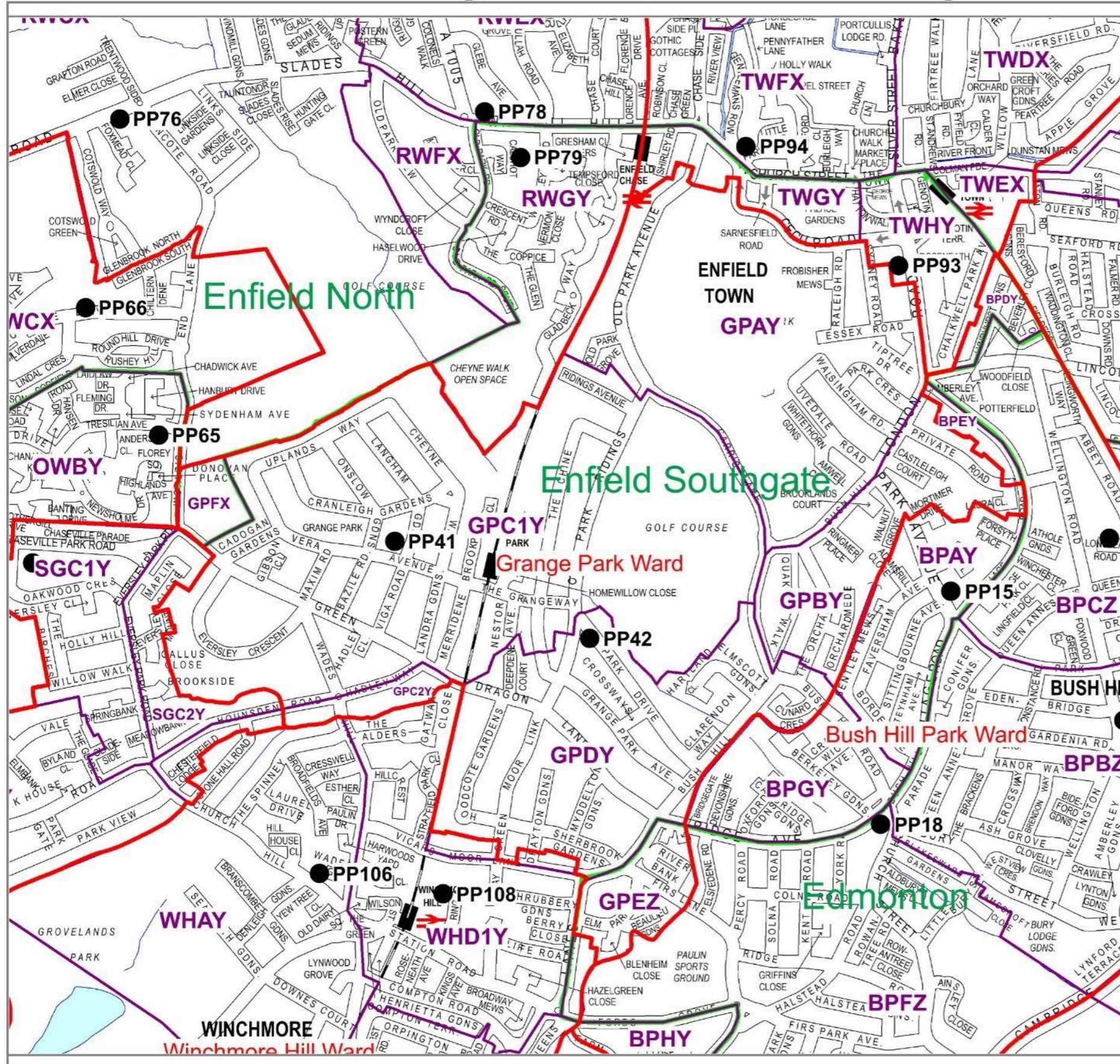
Key	
	2022 Ward Boundary
	2010 Constituency Boundary
	Proposed Polling District boundary
	Proposed Polling Place

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Enfield Lock – 3 councillors

Polling district identifier	Parliamentary constituency	Proposed polling district	Polling place	Justification	Included for information purposes only		
					No. of polling stations	Estimated in-person electors	Disabled access at polling place
ELAX	Enfield North	The proposal is to follow the existing (2021) polling district boundaries.	Temporary Building (Park Road Flats), Park Road	No amendments suggested. The railway line creates a boundary between the east and west of the ward with very limited crossing points. The LGBCE changes have not affected this polling district and the current boundaries remain appropriate. No negative feedback reported from use of polling place at May 2021 elections. No suitable permanent premises have been identified.	1	1,322	Yes
ELBX	Enfield North	The proposal is to follow the existing (2021) polling district boundaries.	Totteridge Road Baptist Church Hall, Totteridge Road	No amendments suggested. The LGBCE changes have not affected this polling district and the current boundaries remain appropriate. No negative feedback reported from use of polling place at May 2021 elections.	1	757	Yes
ELC1X	Enfield North	The proposal is to follow the existing (2021) polling district boundaries.	Ordnance Unity Centre Library, Hertford Road	No amendments suggested. The LGBCE changes have not affected this polling district and the current boundaries remain appropriate. No negative feedback reported from use of polling place at May 2021 elections.	1	1,085	Yes
ELC2X	Enfield North	The proposal is to follow the existing (2021) polling district boundary and new ward boundaries.		As this area is currently in a separate ward to ELC1X, it will require a separate register until the May 2022 elections. Electors in this area have traditionally voted at St. Hellier Hall which is outside the ward boundaries. The proposed polling place is conveniently located for electors in this area.			
ELDX	Enfield North	The proposal is to follow the existing (2021) polling district boundary.	St. Peter and St. Paul Church Hall, Ordnance Road	No amendments suggested. Ordnance Road is a connecting road which runs through the polling district. The LGBCE changes have not affected this polling district and the current boundaries remain appropriate. No negative feedback reported from use of polling place at May 2021 elections.	1	1,597	Yes
ELEX	Enfield North	The proposal is to follow the existing (2021) polling district boundary.	Prince of Wales School, Salisbury Road	No amendments suggested. The railway line creates a boundary between the east and the west of the ward with very limited crossing points. The LGBCE changes have not affected this polling district and the current boundaries remain appropriate. No negative feedback reported from use of polling place at May 2021 elections. No suitable alternative premises have been identified.	1	2,197	Yes
ELFX	Enfield North	The proposal is to follow the existing (2021) polling district boundary.	Enfield Island Community Centre, Centre Way	No amendments suggested. Enfield Island Village has a distinct community identity and is surrounded by water. The LGBCE changes have not affected this polling district and the current boundaries remain appropriate. No negative feedback reported from use of polling place at May 2021 elections.	1	1,874	Temporary ramp required

Grange Park Ward - Polling Scheme 2022



Map Ref	Location of proposed Polling Place
PP15	St. Stephen's Hall
PP93	Our Lady of Mount Carmel and St. George R.C. Church
PP41	St. Peter's Church (Winchmore Hill)
PP42	Grange Park Methodist Church Hall

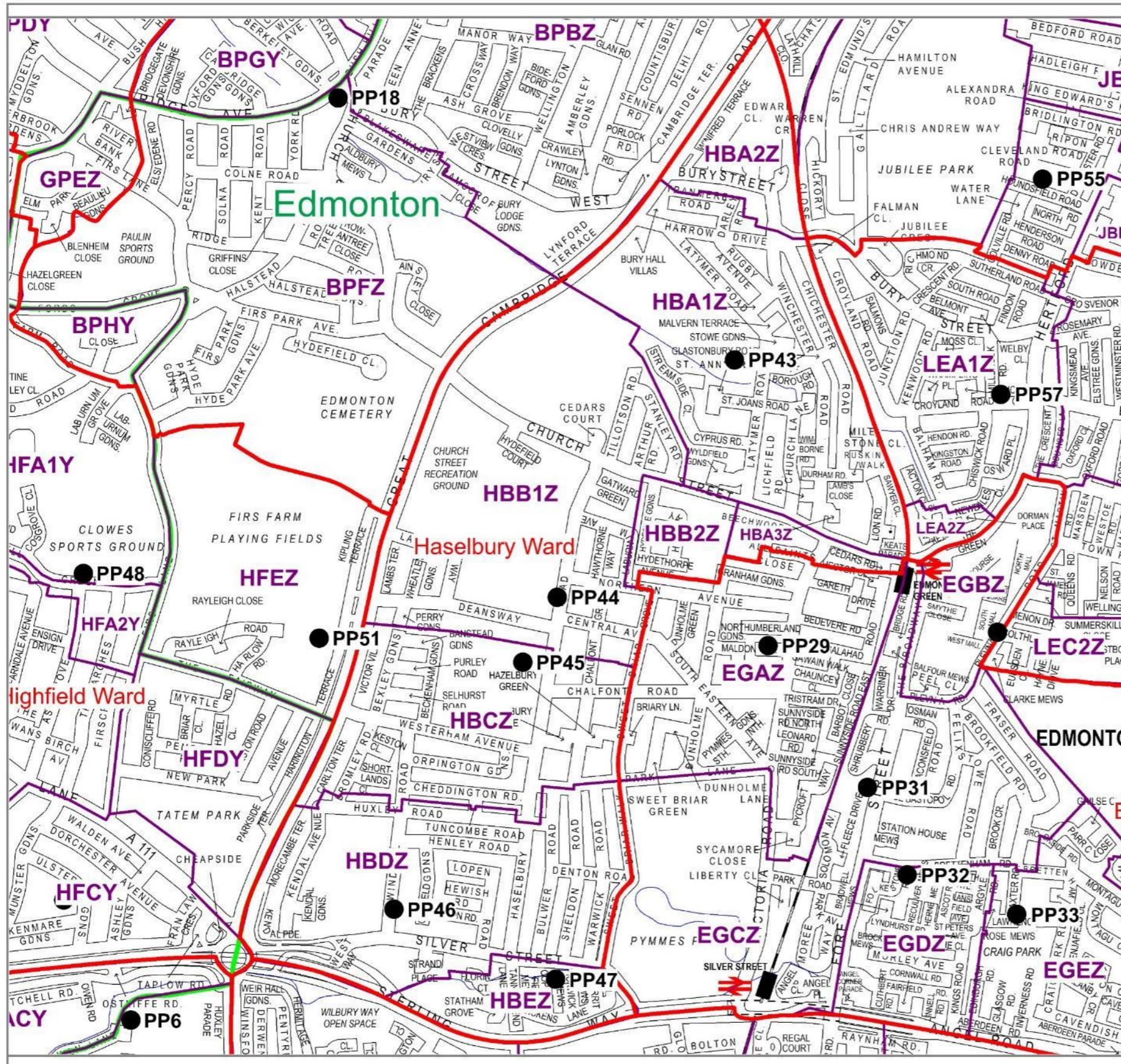
Key	
	2022 Ward Boundary
	2010 Constituency Boundary
	Proposed Polling District boundary
	Proposed Polling Place

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Grange Park – 2 councillors

Polling district identifier	Parliamentary constituency	Proposed polling district	Polling place	Justification	Included for information purposes only		
					No. of polling stations	Estimated in-person electors	Disabled access at polling place
GPAY	Enfield Southgate	The proposal is to follow Bush Hill/London Road, the existing (2021) polling district boundary and new ward boundaries. Please consult the map for further details.	Our Lady of Mount Carmel and St George R.C. Church, London Road	<p>Electors on Park Crescent, Walsingham Road, Uvedale Road, Whitethorn Gardens and Amwell Close exit on to Bush Hill/London Road.</p> <p>The proposed polling place is situated in Town ward and will require two polling stations serving two different wards. No suitable polling place has been identified within the ward boundaries. The polling place is conveniently located for the electors. No negative feedback reported from use of polling place at May 2021 elections.</p>	1 Note: Additional polling station at the venue for Town Ward	1,105	Yes
GPBY	Enfield Southgate	The proposal is to follow the existing (2021) polling district boundary, Bush Hill/London Road and new ward boundaries. Please consult the map for further details.	St Stephen's Hall, Park Avenue	<p>The A105 London Road is an arterial road which creates a boundary.</p> <p>Electors in this area have traditionally voted at this polling place which is situated in Bush Hill Park ward. The polling place will require two polling stations serving two different wards. No suitable polling place has been identified within the ward boundaries. No negative feedback reported from use of polling place at May 2021 elections.</p>	1 Note: Additional polling station at the venue for Bush Hill Park Ward	373	Yes
GPC1Y	Enfield Southgate	The proposal is to amend the existing (2021) polling district boundary to include the entirety of the Bush Hill Park Golf Course.	St. Peter's Church Hall (Winchmore Hill), Langham Gardens	<p>The properties are separated from the rest of the ward by the Bush Hill Park Golf Course. The Grangeway/Vera Avenue is a connecting road that runs through the polling district.</p> <p>No amendments suggested to polling place. No negative feedback reported from use of polling place at May 2021 elections.</p>	1	1,792	Yes
GPC2Y	Enfield Southgate	The proposal is to follow the existing (2021) polling district boundaries and new ward boundaries.		<p>This area is currently in a different ward to GPC1Y. It therefore requires a separate register until the May 2022 elections.</p> <p>Electors in this area traditionally voted at either St. Paul's C.E. Primary School or Friends Meeting House which are both situated outside the ward boundaries. The proposed polling place is conveniently located for the electors.</p>			
GPFX	Enfield North	This is a small area with 0 electors.		<p>This area is in a different parliamentary constituency (Enfield North) to the rest of Grange Park Ward (Enfield Southgate) and therefore requires a separate polling district.</p>			
GPDY	Enfield Southgate	The proposal is to follow the existing (2021) polling district boundaries and new ward boundaries.	Grange Park Methodist Church Hall, Park Drive	<p>The LGBCE has made minor amendments to the southern boundary only. The adjusted boundary remains appropriate.</p> <p>No amendments suggested to polling place. No negative feedback reported from use of polling place at May 2021 elections.</p>	2 (one for GPDY and one for GPEZ)	1,269	Yes
GPEZ	Edmonton	The proposal is to follow the parliamentary constituency boundary and new ward boundaries.		<p>This area is in a different parliamentary constituency (Edmonton) to the rest of Grange Park Ward (Enfield Southgate) and therefore requires a separate polling district.</p> <p>Electors in this area traditionally voted at Ridge Avenue Library which is situated outside the ward boundaries. The proposed polling place is conveniently located for electors and at a similar distance.</p>		298	

Haselbury Ward - Polling Scheme 2022



Map Ref	Location of proposed Polling Place
PP43	Churchfield Primary School
PP44	Temporary Building (Latymer School)
PP45	Hazelbury Primary School
PP46	St. Adhelm's Church Hall
PP47	Klinger Hall

Key

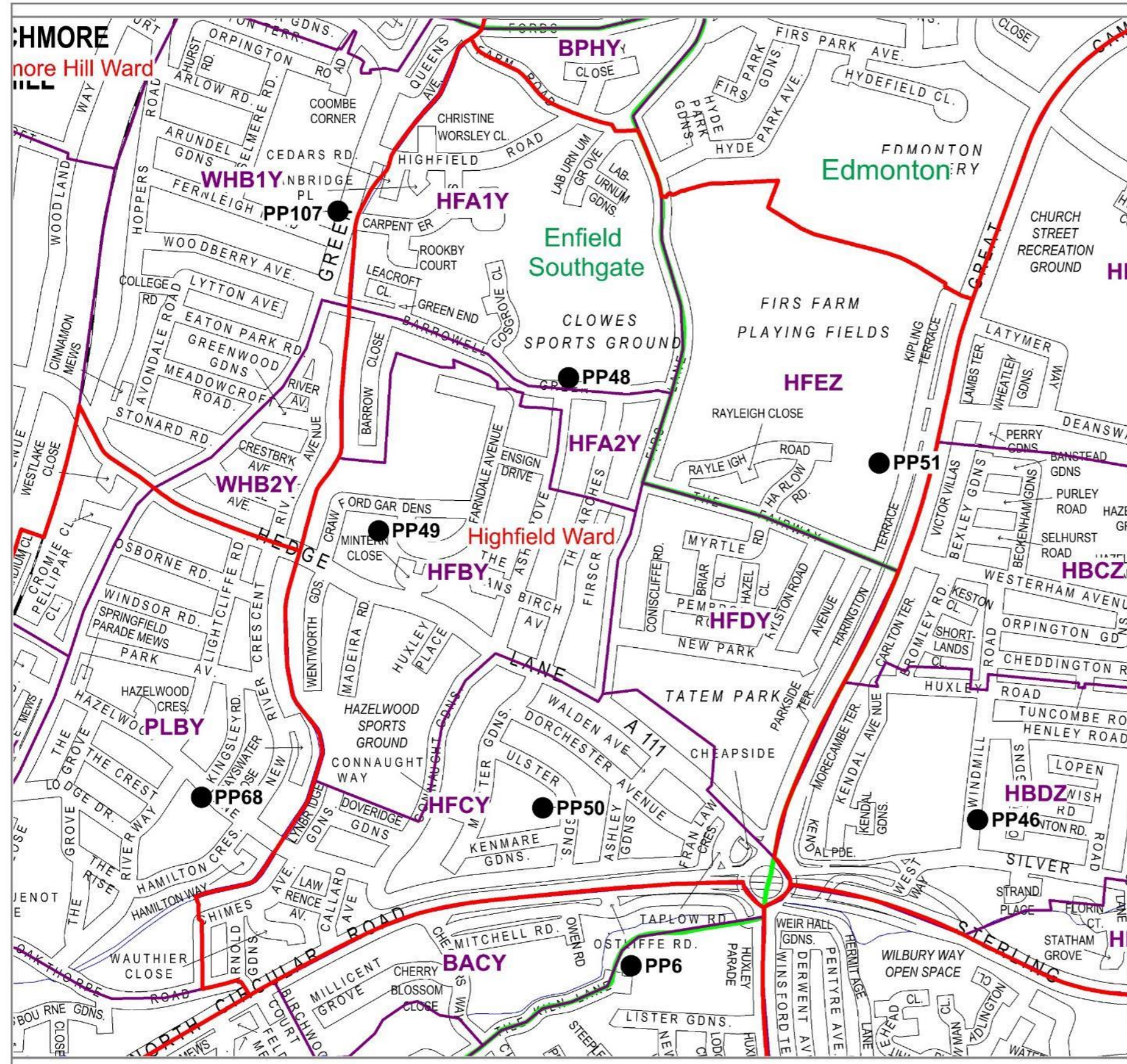
- 2022 Ward Boundary
- 2010 Constituency Boundary
- Proposed Polling District boundary
- Proposed Polling Place

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Haselbury – 3 councillors

Polling district identifier	Parliamentary constituency	Proposed polling district	Polling place	Justification	Included for information purposes only		
					No. of polling stations	Estimated in-person electors	Disabled access at polling place
HBA1Z	Edmonton	The proposal is to follow the existing (2021) polling district boundaries.	Churchfield Primary School, Latymer Road	No amendments suggested. The LGBCE changes have not affected this polling district and the current boundaries remain appropriate. No negative feedback reported from use of polling place at May 2021 elections. No suitable alternative venues have been identified. As the polling place electorate is above 2,500 two polling stations are recommended.	2	2,723	Yes
HBA2Z	Edmonton	The proposal is to follow the existing (2021) polling district boundary and new ward boundaries, see the map for details.		As this area is currently in a separate ward to HBA1Z and HBA3Z, it will require a separate register until the May 2022 elections. The electors in this area used to vote at a Temporary Building on Lee Road Open Space which is outside the ward boundaries. The proposed polling place is conveniently located for the electors.			
HBA3Z	Edmonton	The proposal is to create a new polling district below Church Street to the ward boundary, see the map for details.		As this area is currently in a separate ward to HBA1Z and HBA2Z, it will require a separate register until the May 2022 elections. The electors in this area used to vote at Memorial Hall which is outside the ward boundaries. The proposed polling place is conveniently located for the electors.			
HBB1Z	Edmonton	The proposal is to follow the existing (2021) polling district boundary.	Temporary Building (Latymer School), Haselbury Road	No amendments suggested. The LGBCE changes have not affected this polling district and the current boundaries remain appropriate. No negative feedback reported from use of polling place at May 2021 elections. No suitable permanent venues have been identified.	1	1,913	Yes
HBB2Z	Edmonton	The proposal is to create a new district comprising of properties on Hydethorpe Avenue, Hyde Way and Hydeside Gardens.		This area is currently in a separate ward to HBB1Z. it will require a separate register until the May 2022 elections. The electors in this area used to vote at Memorial Hall which is outside the ward boundaries. The proposed polling place is conveniently located for the electors.			
HBCZ	Edmonton	The proposal is to follow the existing (2021) polling district boundaries.	Hazelbury Primary School, Haselbury Road	No amendments suggested. The LGBCE changes have not affected this polling district and the current boundaries remain appropriate. No negative feedback reported from use of polling place at May 2021 elections. No suitable alternative premises have been identified.	1	1,568	Yes
HBDZ	Edmonton	The proposal is to follow the existing (2021) polling district boundaries.	St. Adhelm's Church Hall, Windmill Road	No amendments suggested. The LGBCE changes have not affected this polling district and the current boundaries remain appropriate. No negative feedback reported from use of polling place at May 2021 elections.	1	2,329	Temporary ramp required
HBEZ	Edmonton	The proposal is to follow the existing (2021) polling district boundary.	Klinger Hall, Copperfield Mews	No amendments suggested to polling district. The LGBCE changes have not affected this polling district and the current boundaries remain appropriate. Silver Street is a busy road which creates a boundary. Klinger Hall was unavailable at the May 2021 elections due to its use as a Covid-19 testing centre. The replacement venue was Silver Street Community Church. The proposal is to return to the use of Klinger Hall as it offers better disabled access.	1	574	Yes

Highfield Ward - Polling Scheme 2022



Map Ref	Location of proposed Polling Place
PP48	Northampton Exiles Cricket Club
PP49	The Broomfield Club
PP50	Mayfield Athletic Club
PP51	Firs Farm School

Key

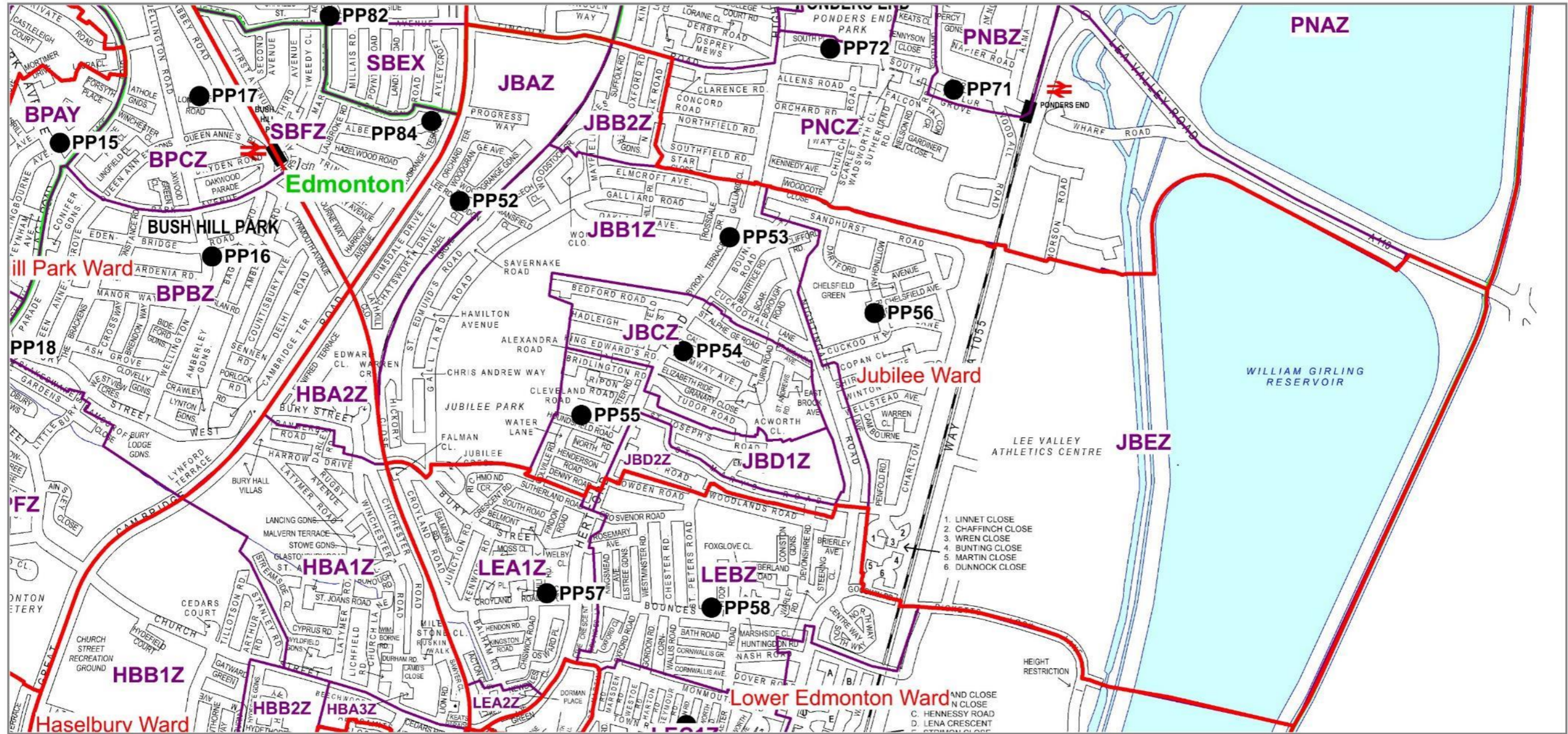
- ▬ 2022 Ward Boundary
- ▬ 2010 Constituency Boundary
- ▬ Proposed Polling District boundary
- Proposed Polling Place

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Highfield Ward – 2 councillors

Polling district identifier	Parliamentary constituency	Proposed polling district	Polling place	Justification	<i>Included for information purposes only</i>		
					No. of polling stations	Estimated in-person electors	Disabled access at polling place
HFA1Y	Enfield Southgate	The proposal is to follow the existing (2021) polling district boundaries and new ward boundaries.	Northampton Exiles Cricket Club, Barrowell Green	Firs Lane divides the ward from north to south. The LGBCE has adjusted the north and west boundaries reducing the electorate. Electors in this area traditionally voted at Holy Trinity Church Hall which is outside the ward boundaries. The proposed polling place is conveniently located for the electors. This is a new polling place which has not been used at previous elections.	1	1,018	Temporary ramp required
HFA2Y	Enfield Southgate	The proposal is to create a new polling district comprised of properties that were in the same polling district as HFBY with vehicular access to Barrowell Green.		This area is currently in a different ward to HFA2Y. It will therefore require a separate register until the May 2022 elections. Electors in this area traditionally voted at The Broomfield Club. The proposed polling place is more conveniently located for the electors as they have convenient access to Barrowell Green.			
HFBY	Enfield Southgate	The proposal follows the new ward boundary on the west, the existing (2021) polling district boundary to the south and south east. The northern boundary has been adjusted to exclude properties with vehicular access to Barrowell Green.	The Broomfield Club, Hedge Lane	The proposed use of Northampton Exiles Cricket Club, Barrowell Green warranted the exclusion of properties at the northern boundary. No amendments suggested to polling place. No negative feedback was reported from use of the polling place at the May 2021 elections.	1	1,300	Yes
HFCY	Enfield Southgate	The proposal is to follow the existing (2021) northerly polling district boundaries and new ward boundaries to the west and south.	Mayfield Athletic Club, Kenmare Gardens	The LGBCE have extended the ward boundary westward to New River. The properties located between the New River and Connaught Gardens have been reallocated to HFCY. The previous polling place for these electors is no longer within the ward boundary. No amendments suggested to polling place. No negative feedback was reported from use of the polling place at the May 2021 elections.	1	1,570	Temporary ramp required
HFDY	Enfield Southgate	The proposal is to follow the existing (2021) polling district boundaries.	Firs Farm School, Rayleigh Road	No amendments suggested. Firs Lane and Tatem Park create a boundary. The LGBCE changes have not affected this polling district and the current boundaries remain appropriate. The polling place has traditionally had two polling stations serving two parliamentary constituencies.	2 (one for HFDY and one for HFEZ)	888	Yes
HFEZ	Edmonton	The proposal is to follow the ward boundaries and UK parliamentary constituency boundaries.		This area is in a separate parliamentary constituency (Edmonton) to the rest of Highfield Ward (Enfield Southgate) and therefore requires a separate polling district. No amendments suggested to polling place. The polling place is located close to where most of the electors in the polling district live. No negative feedback was reported from use of the polling place at the May 2021 elections.		392	

Jubilee Ward - Polling Scheme 2022



Map Ref	Location of proposed Polling Place
PP52	Temporary Building (Lee Road Open Space)
PP53	St. Alphege Church Hall
PP54	Tramway Christian Fellowship
PP55	Houndsfield Primary School
PP56	Mottingham Hall



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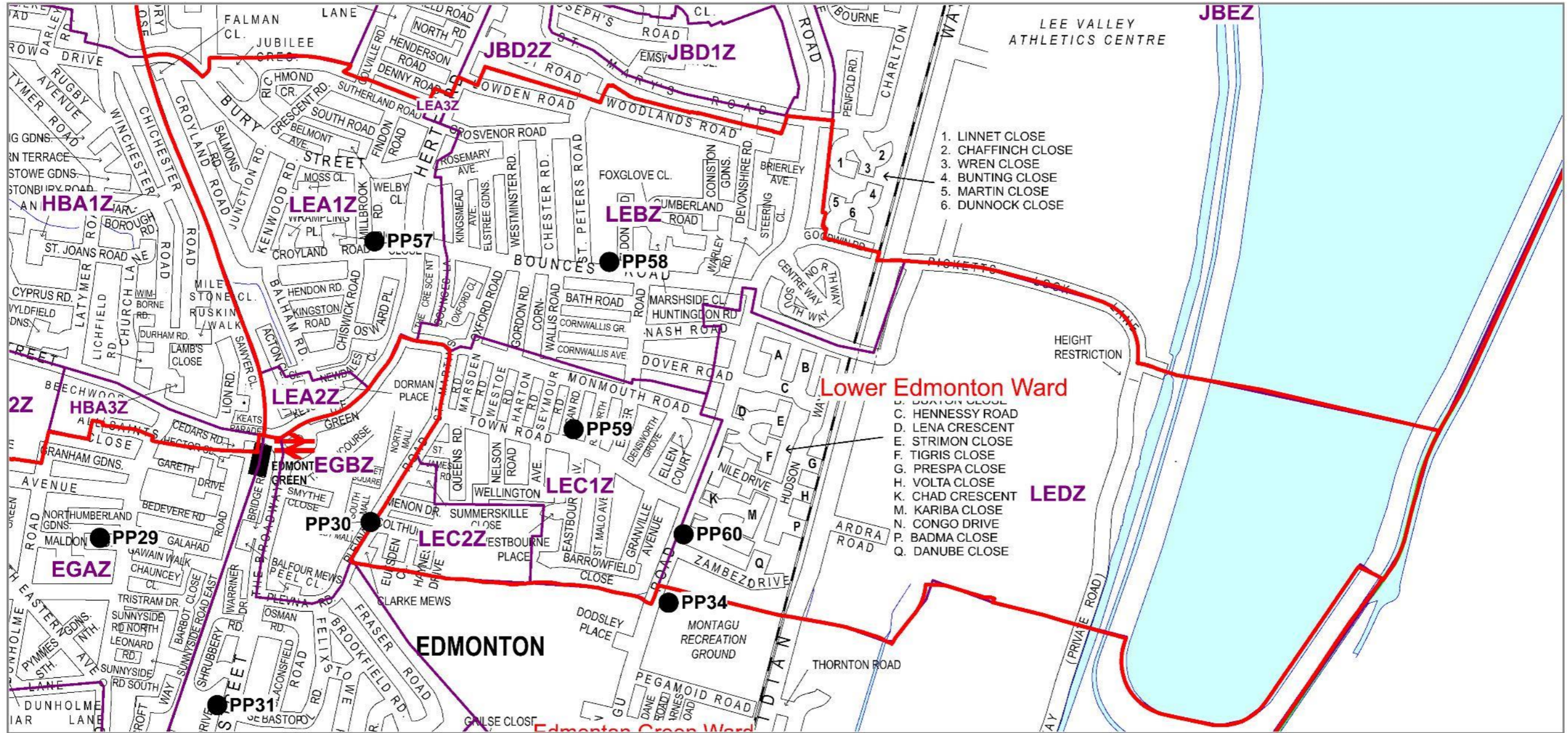
Key

- ▬ 2022 Ward Boundary
- ▬ 2010 Constituency Boundary
- ▬ Proposed Polling District boundary
- Proposed Polling Place

Jubilee - 3 councillors

					<i>For information purposes only</i>		
Polling district identifier	Parliamentary constituency	Proposed polling district	Polling place	Justification	No. of polling stations	Estimated in-person electors	Disabled access at polling place
JBAZ	Edmonton	The proposal is to follow the existing (2021) polling district boundaries.	Temporary Building (Lee Road Open Space), Lee Road	No amendments suggested. The railway line creates a boundary with very limited crossing points. No negative feedback reported from use of polling place at May 2021 elections. No suitable permanent premises have been identified within polling district.	1	667	Yes
JBB1Z	Edmonton	The proposal is to follow the railway line to the western boundary, follow the new ward boundary and the boundaries for JBCZ and JBD1Z. Please see the map for details	St Alphege Church Hall, Rosedale Drive	It is proposed to move away from Galliard Primary School which previously served as a polling place for some of the electors in the new polling district boundaries. The church is centrally located on Hertford Road and has previously been used as a polling place. Electors on Nightingale Road are not able to easily access the other polling places in the district. No negative feedback reported from use of polling place at May 2022 elections. As the polling place electorate is above 2,500 two polling stations are recommended.	2	2,986	Yes
JBB2Z	Edmonton	The proposal is to follow the existing (2021) polling district boundaries and new ward boundary.		This area is currently in a separate ward to JBB1Z. It will therefore require a separate register until the May 2022 elections. Electors in this area traditionally voted at The Qube which is situated outside the ward boundaries. The proposed polling place is conveniently located as they have access via Elmcroft Avenue or Galliard Road.			
JBCZ	Edmonton	The proposal is to amend the existing (2021) polling district boundaries to include properties on both sides of Tudor Road.	Tramway Christian Fellowship, Tramway Avenue	The polling district has been adjusted to enable electors on both sides of Tudor Road to vote at the most convenient polling place. No amendments suggested to polling place. Negative feedback surrounding the lack of parking were reported at the May 2021 elections. No suitable alternative venues have been identified.	1	1,357	Yes
JBD1Z	Edmonton	The proposal is to follow the existing (2021) polling district boundaries and new ward boundary with the exclusion of properties along Tudor Road.	Houndsfield Primary School, Ripon Road	The polling district covers both sides of Hertford Road due to the lack of suitable venues to the east. No amendments suggested to polling place. No negative feedback reported from use of polling place at May 2021 elections. No suitable alternative premises have been identified.	1	1,290	Yes
JBD2Z	Edmonton	The proposal is to follow the existing (2021) polling district boundaries and new ward boundary.		As this area is currently in a separate ward to JBD1Z, it will require a separate register until the May 2022 elections. Electors in this area traditionally voted at St. Peter's Church Hall (Edmonton) which is situated outside the ward boundaries.			
JBEZ	Edmonton	The proposal is to follow the existing (2021) polling district boundaries and new ward boundary.	Mottingham Hall, Mottingham Road	The properties are situated to the west of the railway line which runs through the polling district. The LGBCE changes have not affected this polling district and the current boundaries remain appropriate. No amendments suggested to polling place. No negative feedback reported from use of polling place at May 2021 elections.	1	1,905	Yes

Lower Edmonton Ward - Polling Scheme 2022



Map Ref	Location of proposed Polling Place
PP57	St. Edmund's Church Hall
PP58	St. Peter's Church Hall (Edmonton)
PP59	St. Demetrios Church Hall
PP60	Temporary Building (Montagu Road adj. Chad Crescent)



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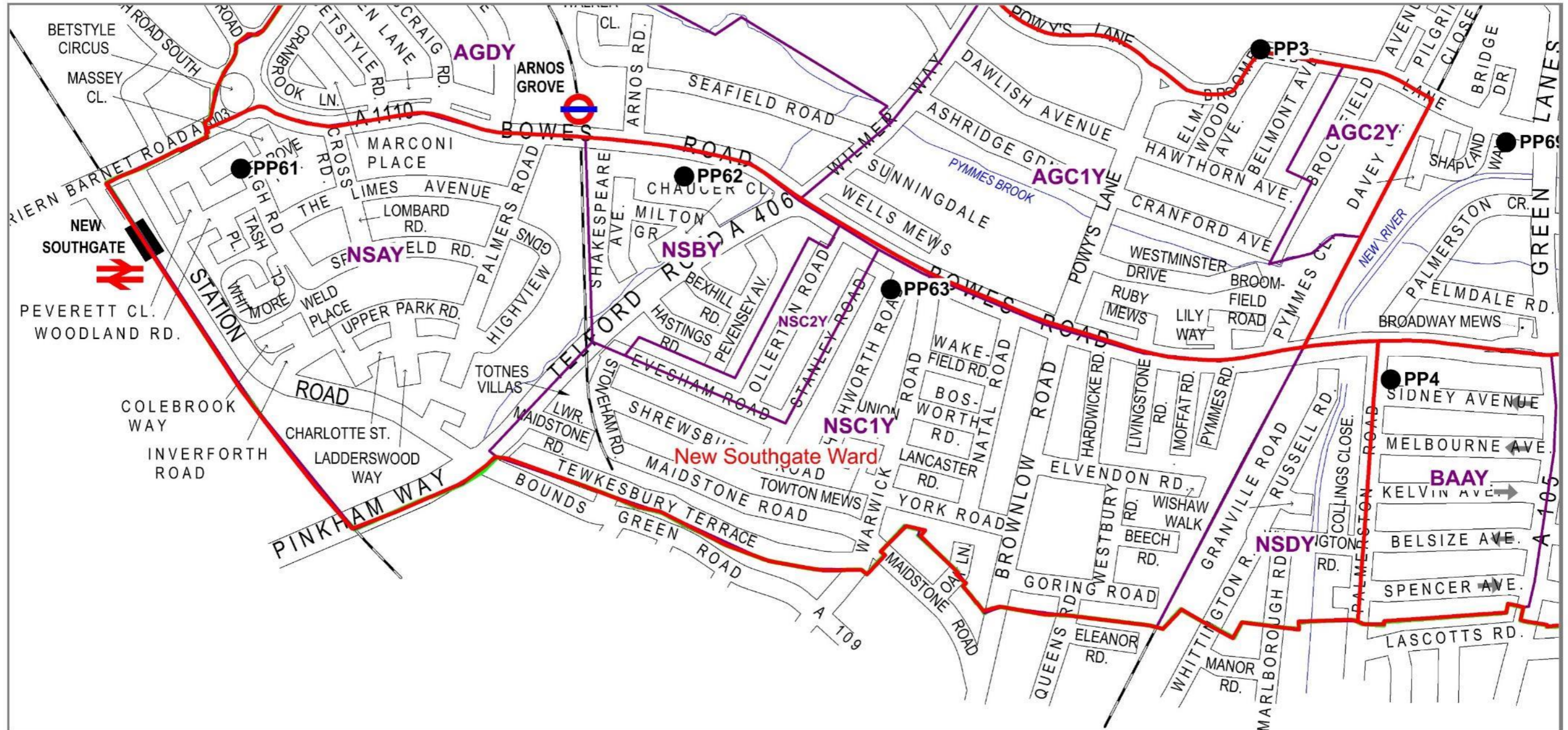
Key

- 2022 Ward Boundary
- 2010 Constituency Boundary
- Proposed Polling District boundary
- Proposed Polling Place

Lower Edmonton – 3 councillors

Polling district identifier	Parliamentary constituency	Proposed polling district	Polling place	Justification	<i>Included for information purposes only</i>		
					No. of polling stations	Estimated in-person electors	Disabled access at polling place
LEA1Z	Edmonton	The proposal is to follow the existing (2021) polling district boundaries.	St. Edmund's Church Hall, Croyland Road	No amendments suggested. The Hertford Road A1010 is an arterial road which creates a boundary. Properties to the east of Hertford Road are included to enable convenient access to the nearest polling place. No negative feedback reported from use of polling place at May 2021 elections. As the polling place electorate is above 2,500 two polling stations are recommended.	2	2,586	Yes
LEA2Z	Edmonton	The proposal is to follow the existing (2021) polling district boundaries and new ward boundaries.		This area is currently in a separate ward to LEA1Z and LEA3Z. It will therefore require a separate register until the May 2022 elections. The electors in this area traditionally voted at Edmonton Green Library which is situated outside the ward boundaries. The proposed polling place is conveniently located for the electors.			
LEA3Z	Edmonton	The proposal is to follow the existing (2021) polling district boundaries and new ward boundaries.		This area is currently in a separate ward to LEA1Z and LEA2Z. It will therefore require a separate register until the May 2022 elections. The electors in this area traditionally voted at Houndsfield Primary School which is situated outside the ward boundaries. The proposed polling place is conveniently located for the electors.			
LEBZ	Edmonton	The proposal is to follow the existing (2021) polling district boundaries and new ward boundaries.	St. Peter's Church Hall (Edmonton), Bounces Road	No amendments suggested. Bounces Road is a connecting road which runs through the polling district. No negative feedback reported from use of polling place at May 2021 elections. As the polling place electorate is above 2,500 two polling stations are recommended.	2	3,008	Yes
LEC1Z	Edmonton	The proposal is to follow the existing (2021) polling district boundaries.	St. Demetrios Church Hall, Logan Road	No amendments suggested. Town Road is a connecting road that runs through the polling district. No negative feedback reported from use of polling place at May 2021 elections.	1	1,775	Yes
LEC2Z	Edmonton	The proposal is to follow the existing (2021) polling district boundaries and new ward boundaries.		This area is currently in a separate ward to LEC1Z. It will therefore require a separate register until the May 2022 elections. The electors in this area traditionally voted at Edmonton Green Library/Green Towers Community Centre which are outside the ward boundaries. The proposed polling place is conveniently located for the electors.			
LEDZ	Edmonton	The proposal is to follow the existing (2021) polling district boundaries.	Temporary Building (Montagu Road adj. Chad Crescent)	No amendments suggested. The LGBCE changes have not affected this polling district and the current boundaries remain appropriate. The properties in this polling district are concentrated to the west of the railway line. Negative feedback surrounding the lack of parking was reported at the May 2021 elections. No suitable alternative venues have been identified within this polling district.	1	1,168	Yes

New Southgate Ward - Polling Scheme 2022



Map Ref	Location of proposed Polling Place
PP4	Trinity at Bowes Methodist Church Hall
PP61	St. Paul's Parish Hall (New Southgate)
PP62	Bowes Road Library
PP63	Bowes Primary School



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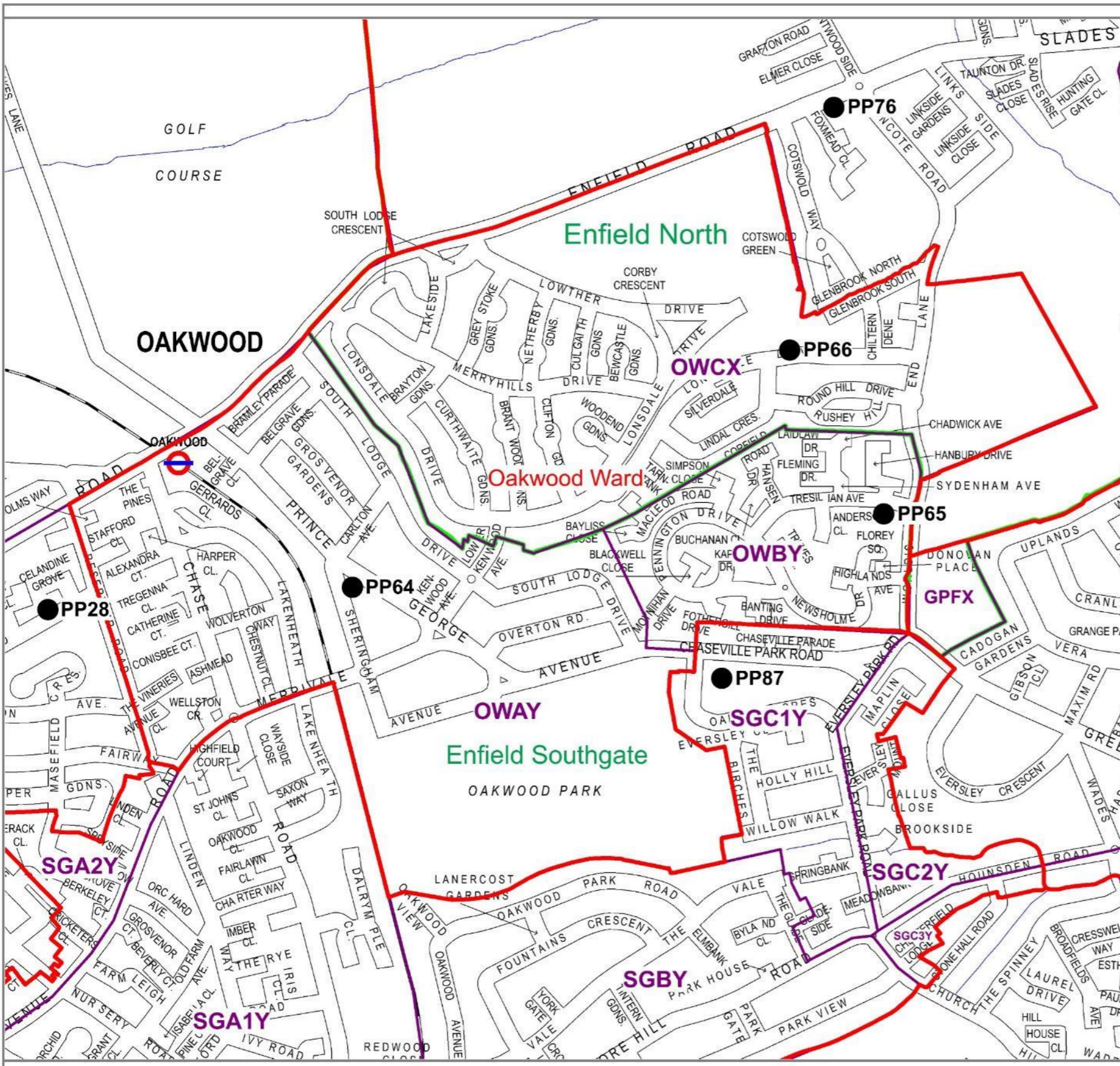
Key

- 2022 Ward Boundary
- 2010 Constituency Boundary
- Proposed Polling District boundary
- Proposed Polling Place

New Southgate - 2 councillors

Polling district identifier	Parliamentary constituency	Proposed polling district	Polling place	Justification	<i>Included for information purposes only</i>		
					No. of polling stations	Estimated in-person electors	Disabled access at polling place
NSAY	Enfield Southgate	The proposal is to follow the existing (2021) polling district boundaries and new ward boundaries.	St. Paul's Parish Hall (New Southgate), High Road	No amendments suggested. The railway line and Telford Road A406 create a boundary with limited crossing points. Negative feedback surrounding the lack of parking was reported at the May 2021 elections. No suitable alternative venues have been identified.	1	1,562	Yes
NSBY	Enfield Southgate	The proposal is to follow the existing polling district boundaries and new ward boundary with the exclusion of properties on Ollerton Road, Stanley Road and the northern side of Eversham Road.	Bowes Road Library, Bowes Road	Telford Road A406 is an arterial road which runs through the polling district. No amendments suggested to polling place. No negative feedback was reported from use of the polling place at the May 2021 elections. The polling place will require two polling stations serving two different wards.	1 Note: Additional polling station at the venue for Arnos Grove Ward	457	Temporary ramp required
NSC1Y	Enfield Southgate	The proposal is to follow the existing polling district boundaries.	Bowes Primary School, Bowes Road	No amendments suggested. The LGBCE changes have not affected this polling district and the current boundaries remain appropriate. Consideration was given to the use of Bounds Green Tennis Club as the polling place. However, there were concerns around lack of parking and location of the venue at the southern edge of the polling district. As the polling place electorate is above 2,500, two polling stations are recommended.	2	2,924	Yes
NSC2Y	Enfield Southgate	The proposal is to create a new polling district comprised of properties on Ollerton Road, Stanley Road and the northern side of Eversham Road.		This area is currently in a different ward to NSC1Y. It therefore requires a separate register until the May 2022 elections. Electors in this area traditionally voted at Bowes Road Library. Bowes Primary School is more conveniently located as they have easy access via Bowes Road.			
NSDY	Enfield Southgate	The proposal is to follow the ward boundaries and the railway line.	Trinity at Bowes Methodist Church Hall, Palmerston Road	The railway line creates a boundary and there are very limited crossing points. Egress via Palmerston Road to another polling place within the ward would require passing the existing polling place. No amendments suggested to polling place. The polling place is situated in Bowes Ward and will require two polling stations serving two different wards. No suitable premises have been identified within the ward boundaries. No negative feedback was reported from use of the polling place at the May 2021 elections.	1 Note: Additional polling station at the venue for Bowes Ward	679	Yes

Oakwood Ward - Polling Scheme 2022



Map Ref	Location of proposed Polling Place
PP64	St. Thomas' Church (Oakwood)
PP65	Highlands Village Hall
PP66	Temporary Building (Lonsdale Drive)

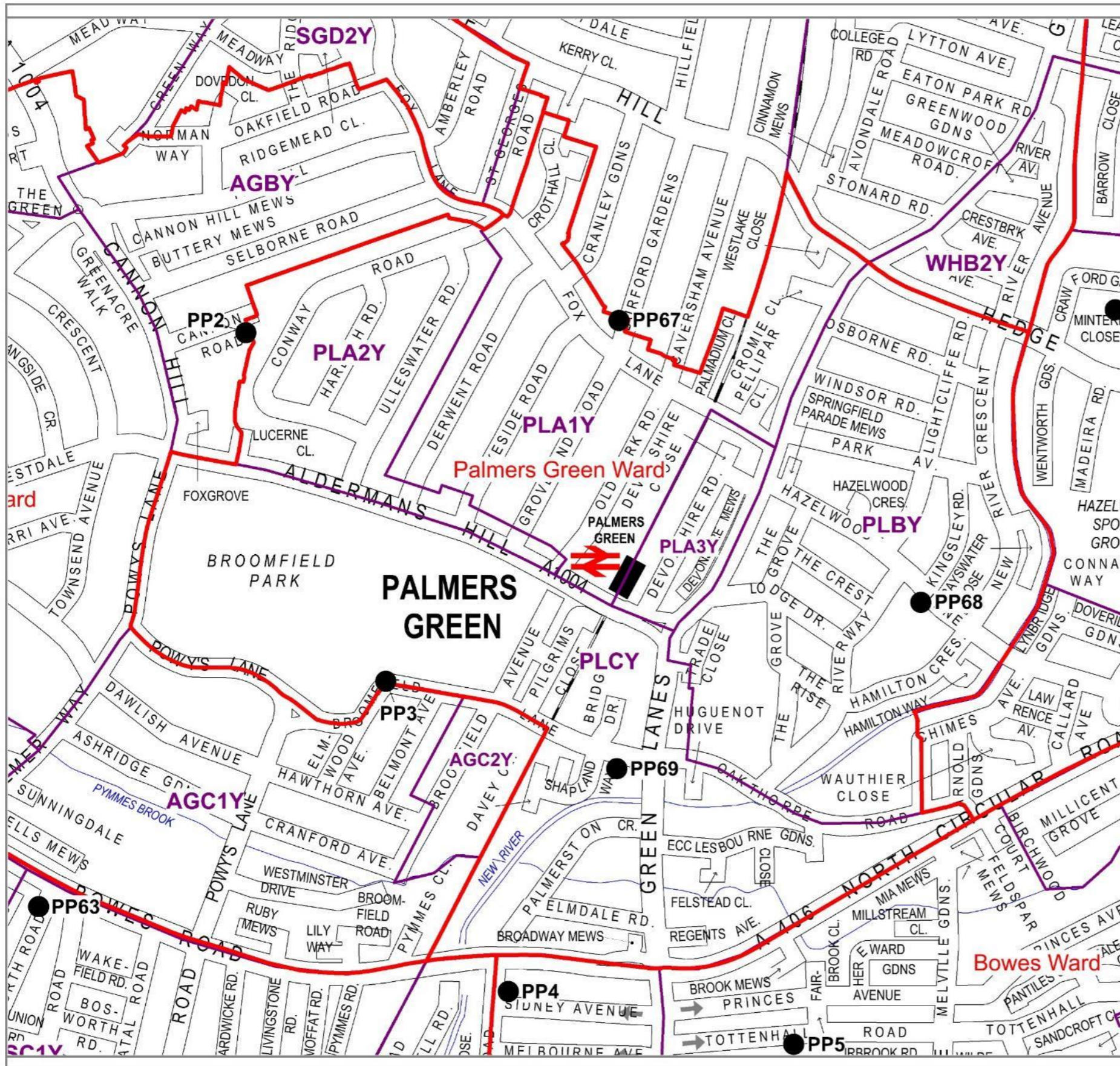
Key	
	2022 Ward Boundary
	2010 Constituency Boundary
	Proposed Polling District boundary
	Proposed Polling Place

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Oakwood – 2 councillors

Polling district identifier	Parliamentary constituency	Proposed polling district	Polling place	Justification	<i>Included for information purposes only</i>		
					No. of polling stations	Estimated in-person electors	Disabled access at polling place
OWAY	Enfield Southgate	The proposal is to extend the existing (2021) polling district boundaries to the west of Chase Road to the new ward boundary and to the south incorporating Oakwood Park.	St. Thomas' Church, (Oakwood), Prince George Avenue	Electors to the west of the railway line have access across via Merrivale and Bramley Road to the polling place. No negative feedback reported from use of polling place at May 2021 elections. The polling place is conveniently located for electors.	1	1,994	Yes
OWBY	Enfield Southgate	The proposal is to follow the existing (2021) polling district boundaries.	Highlands Village Hall, Florey Square	No amendments suggested. These properties are distinct from the rest of the ward with access only via Prince George Avenue or World's End Lane. The LGBCE changes have not affected this polling district and the current boundaries remain appropriate. No negative feedback reported from use of polling place at May 2021 elections.	1	1,041	Yes
OWCX	Enfield North	The proposal is to follow the parliamentary constituency boundary and new ward boundaries.	Temporary Building (Lonsdale Drive), Lonsdale Drive	This area is in a separate parliamentary constituency (Enfield North) to the rest of Oakwood Ward (Enfield Southgate) and therefore requires a separate polling district. Negative feedback around the lack of parking was received at the May 2021 elections. No suitable alternative venues have been identified.	1	1,555	Yes

Palmers Green Ward - Polling Scheme 2022



Map Ref	Location of proposed Polling Place
PP67	Palmers Green United Reformed Church
PP68	Hazelwood Schools
PP69	Palmers Green Library

Key

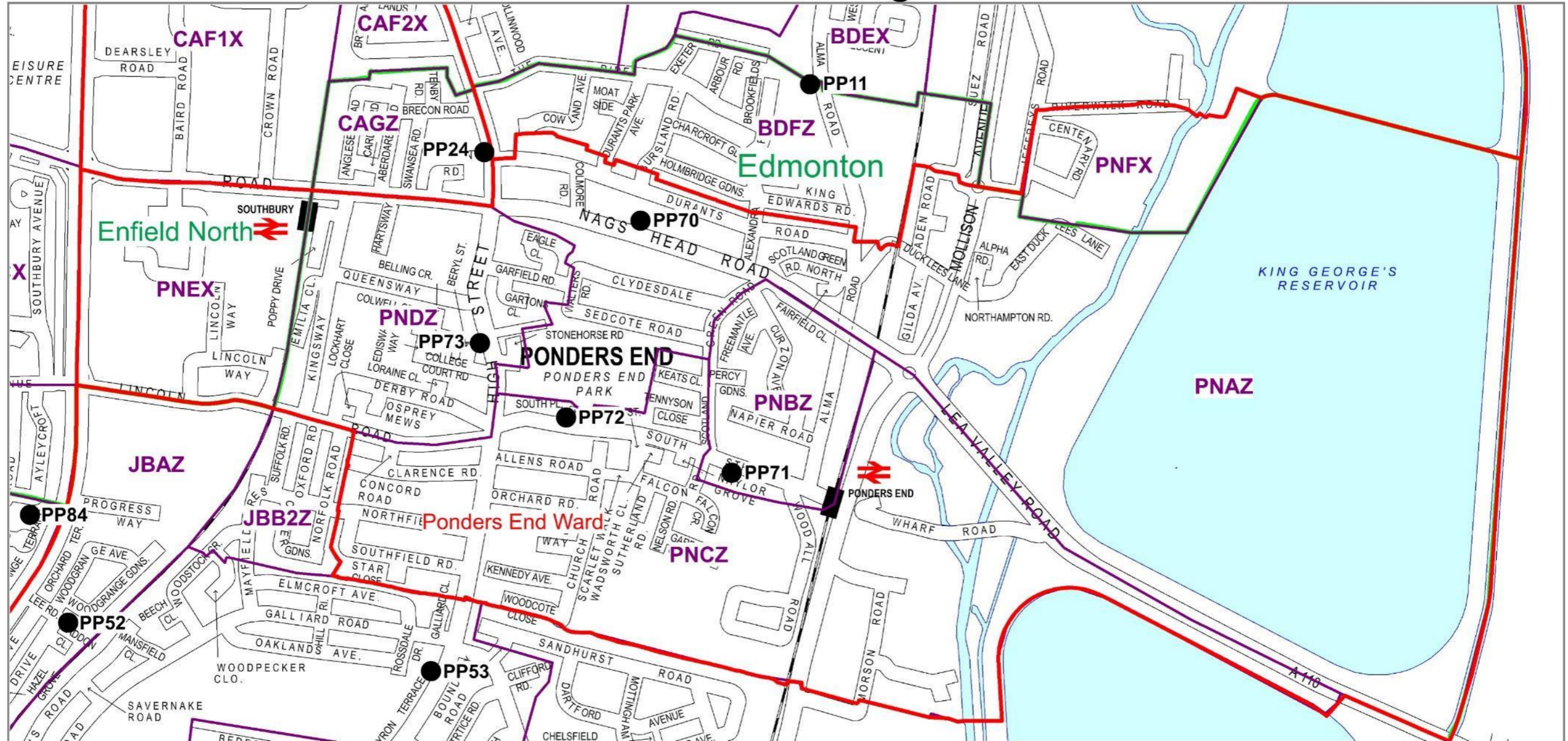
- 2022 Ward Boundary
- 2010 Constituency Boundary
- Proposed Polling District boundary
- Proposed Polling Place

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Palmers Green – 2 councillors

Polling district identifier	Parliamentary constituency	Proposed polling district	Polling place	Justification	<i>Included for information purposes only</i>		
					No. of polling stations	Estimated in-person electors	Disabled access at polling place
PLA1Y	Enfield Southgate	The proposal is to follow the existing polling district boundaries and new ward boundary.	Palmers Green United Reformed Church, Burford Gardens	The polling district has been reduced following the LGBCCE changes. No amendments suggested to polling place. No negative feedback reported from use of polling place at May 2021 elections. This polling place will require two polling stations serving two different wards.	1 Note: Additional polling station at the venue for Winchmore Hill Ward	2,359	Yes
PLA2Y	Enfield Southgate	The proposal is to follow the existing polling district boundaries and new ward boundary.		This area is currently in a separate ward to PLA1Y and PLA3Y. It will therefore require a separate register until the May 2022 elections. Electors in this area traditionally voted at St. Monica's Scout and Guide Headquarters which is situated outside the ward boundaries. The proposed polling place is conveniently located for the electors.			
PLA3Y	Enfield Southgate	The proposal is to create a new polling district comprised of properties on Devonshire Road and Devonshire Mews.		This area is currently in a separate ward to PLA1Y and PLA2Y. It will therefore require a separate register until the May 2022 elections. Electors in this area traditionally voted at Palmers Green Library. The proposed polling place is conveniently located for the electors.			
PLBY	Enfield Southgate	The proposal is to follow the existing (2021) polling district boundaries and new ward boundary.	Hazelwood Schools, Hazelwood Lane	Green Lanes A105 is an arterial road which creates a western boundary and the ward boundary to the east. Oakthorpe Road follows the existing polling district boundary at the southern edge of the polling district. No amendments recommended to polling place. No negative feedback reported from use of polling place at May 2021 elections. No suitable alternative venue has been identified.	1	2,028	Yes
PLCY	Enfield Southgate	The proposal is to extend the existing polling district to follow Aldermans Hill, Oakthorpe Road to the north and the new ward boundaries to the south.	Palmers Green Library, Broomfield Lane	The inclusion of Broomfield Park to the west of the existing polling district does not increase the electorate. No amendments recommended to polling place. This polling place may require two polling stations serving two different wards dependent on the final arrangements for Arnos Grove. No negative feedback reported from use of polling place at the May 2021 elections.	1	1,217	Yes

Ponders End Ward - Polling Scheme 2022



Map Ref	Location of proposed Polling Place
PP70	The Royal British Legion
PP71	Ponders End Youth Centre
PP72	Ponders End Working Mens Club
PP73	Ponders End Library



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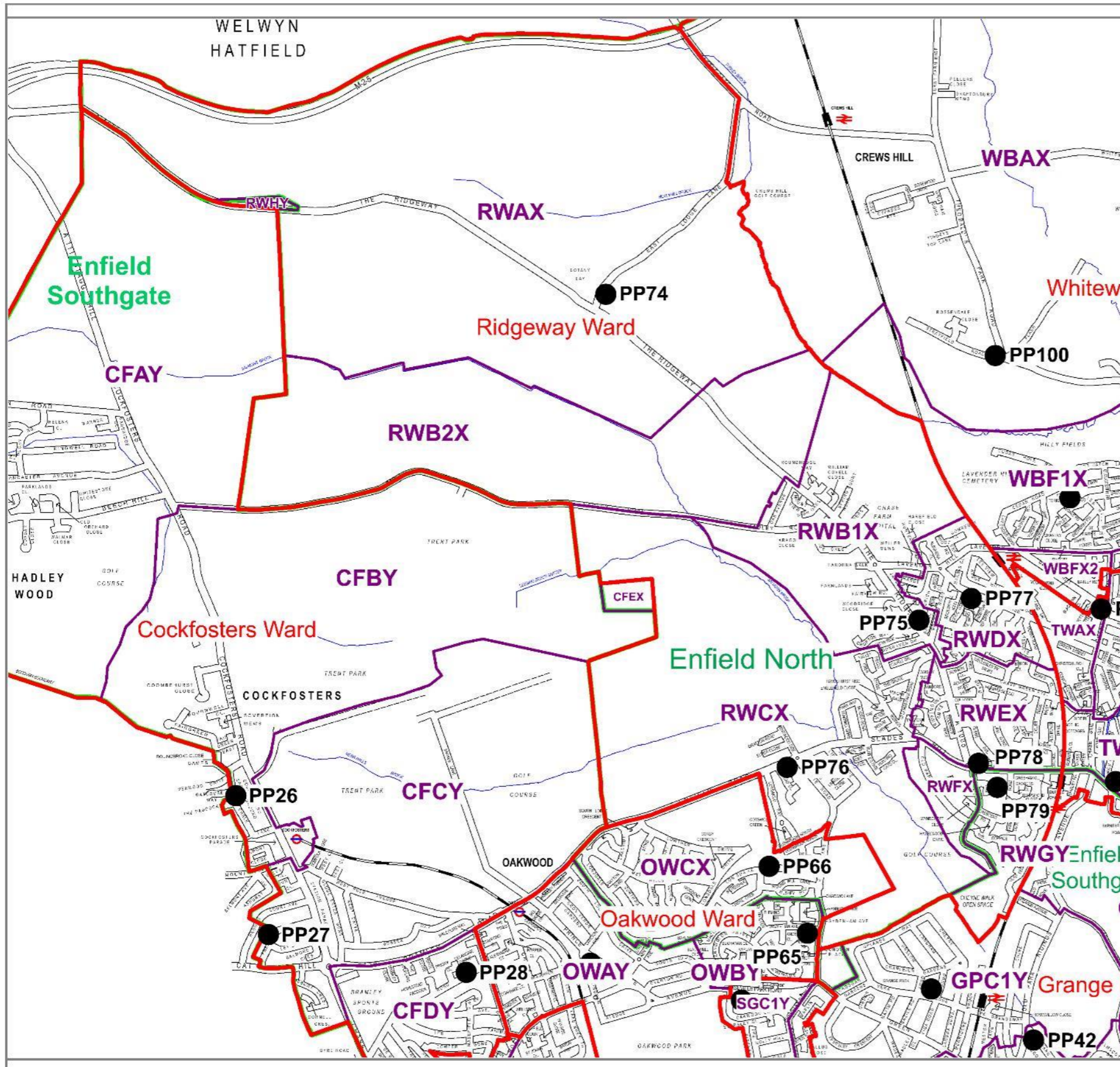
Key

- 2022 Ward Boundary
- 2010 Constituency Boundary
- Proposed Polling District boundary
- Proposed Polling Place

Ponders End– 2 councillors

Polling district identifier	Parliamentary constituency	Proposed polling district	Polling place	Justification	Included for information purposes only		
					No. of polling stations	Estimated in-person electors	Disabled access at polling place
PNAZ	Edmonton	The proposal is to follow Nags Head Road/Lea Valley Road and the new ward boundary with the inclusion of properties on Clydesdale, Walters Road, Sedcote Road and Scotland Green Road (partial) and Ponders End Park. Please consult map for further details.	The Royal British Legion, Nags Head Road	Nags Head Road/Lea Valley Road A110 are arterial roads which create a boundary through the polling district. The electors south of Nags Head Road have traditionally voted at The Qube. The proposed polling scheme replaces The Qube with Ponders End Library. The Royal British Legion is conveniently located for these electors as they have access via Nags Head Road. No negative feedback reported from use of polling place at May 2021 elections.	1	1,479	Yes
PNFX	Enfield North	This is a small area without registered electors which has been moved to Ponders End ward by the LGBCE.		This area is in a separate parliamentary constituency (Enfield North) to the rest of Ponders End ward (Edmonton) and therefore requires a separate polling district.			
PNBZ	Edmonton	The proposal is to follow the existing (2021) polling district boundaries.	Ponders End Youth Centre, South Street	No amendments suggested to polling district. The LGBCE changes have not affected this polling district and the current boundaries remain appropriate Electors in this area traditionally voted at Alma Primary School. The proposal recommends replacing the school with Ponders End Youth Centre which will benefit pupils, parents and teachers. This is a new venue which has recently reopened and which has not been used at previous elections.	1	790	Yes
PNCZ	Edmonton	The proposal is to follow Lincoln Road, the boundaries of PNAZ and PNBZ and the new ward boundary.	Ponders End Working Mens Club, South Street	Lincoln Road/South Street create a boundary. Properties in this polling district are concentrated to the west of the railway line. The east of the railway line is predominantly industrial land. Electors on Keats Close and Tennyson Close have convenient access to the polling place. No amendments suggested to polling place. No negative feedback reported from use of polling place at May 2021 elections.	1	2,140	Yes
PNDZ	Edmonton	The proposal is to follow the parliamentary constituency boundary, new ward boundary, High Street and Lincoln Road with the inclusion of properties on Eagle Close, Garfield Road and Gartons Close. Please consult map for further details.	Ponders End Library, High Street	The High Street and Lincoln Road create a boundary. For ease of access properties and streets exiting onto the High Street are included in this polling district. Electors in this area traditionally voted at The Qube. This required them to cross the High Street which at times is congested. The proposal is to use the Ponders End Library which will be situated on the High Street. The library is currently under construction and the temporary library or The Qube could be considered until the permanent building opens.	2 (one for PNDZ and one for PNEX)	1,246	Yes
PNEX	Enfield North	The proposal is to follow the parliamentary constituency boundary and new ward boundaries.		This area is in a separate parliamentary constituency (Enfield North) to the rest of Ponders End (Edmonton) and therefore requires a separate polling district. Electors in this area traditionally voted at John Jackson Library which is outside the ward boundaries. The proposed polling place is conveniently located for the electors as they have access via Lincoln Road.			

Ridgeway Ward - Polling Scheme 2022



Map Ref	Location of proposed Polling Place
PP74	Botany Bay Cricket Club
PP75	Enfield Lawn Tennis Club
PP76	Temporary Building (between Bincote Road and Foxmead Close)
PP77	Our Lady of Walsingham Church
PP78	St. Mary Magdalene Church
PP79	The Formont Centre

Key

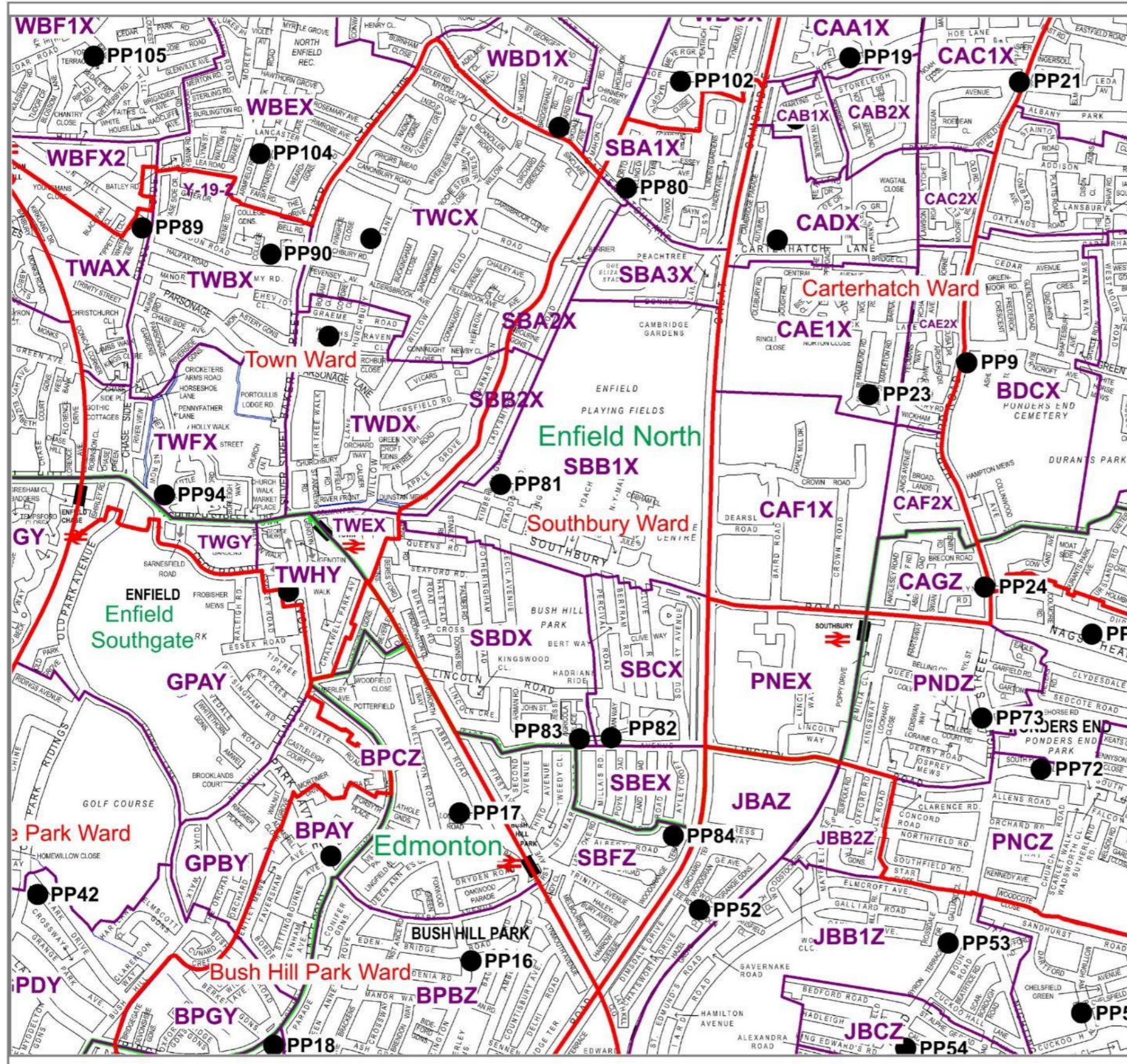
- 2022 Ward Boundary
- 2010 Constituency Boundary
- Proposed Polling District boundary
- Proposed Polling Place

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Ridgeway - 3 councillors

Polling district identifier	Parliamentary constituency	Proposed polling district	Polling place	Justification	Included for information purposes only		
					No. of polling stations	Estimated in-person electors	Disabled access at polling place
RWAX	Enfield North	The proposal is to follow the existing (2021) polling district boundaries and new ward boundary.	Botany Bay Cricket Club, East Lodge Lane	No amendments suggested. Botany Bay is a hamlet which is distinct from the rest of Ridgeway ward. No negative feedback reported from use of polling place at May 2021 elections.	1	77	Temporary ramp required
RWHY	Enfield Southgate	This is a small area without properties or electors.		This area is in a separate parliamentary constituency (Enfield Southgate) to the rest of Ridgeway (Enfield North) and therefore requires a separate polling district.			
RWB1X	Enfield North	The proposal is to follow the existing (2021) polling district boundaries.	Enfield Lawn Tennis Club, The Ridgeway	No amendments suggested. The LGBCE changes have not affected this polling district and the current boundaries remain appropriate. Negative feedback surrounding the gravel car park was reported at the May 2021 elections. No suitable alternative venues have been identified.	1	1,174	Temporary ramp required
RWB2X	Enfield North	The proposal is to follow the existing (2021) polling district boundaries and new ward boundary.		Properties in this polling district are situated along Hadley Road. There are an estimated 13 in-person electors in this area. Electors in this area traditionally voted at St. Luke's Church which is situated outside the ward boundaries. The electors can access the proposed polling place via Hadley Road/The Ridgeway.			
RWCX	Enfield North	The proposal is to follow the existing (2021) polling district boundaries.	Temporary Building (between Bincote Road and Foxmead Close)	No amendments suggested. The LGBCE changes have not affected this polling district and the current boundaries remain appropriate. Concerns have been raised regarding the use of a public house as a polling place. The proposal is to install a temporary unit between Bincote Road and Foxmead Close.	1	1,444	Yes
RWDX	Enfield North	The proposal is to follow the existing (2021) polling district boundaries.	Our Lady of Walsingham Church, John Gooch Drive	No amendments suggested. The LGBCE changes have not affected this polling district and the current boundaries remain appropriate No negative feedback reported from use at May 2021 elections.	1	1,343	Yes
RWEX	Enfield North	The proposal is to follow the existing (2021) polling district boundaries with the exclusion of properties to the south of Slades Hill.	St. Mary Magdalene Church, Windmill Hill	The LGBCE changes has introduced the Formont Centre to the options for polling venues within the ward. The new polling district serves electors north of Slades Hill. No amendments suggested to polling place. No negative feedback reported from use at May 2021 elections.	1	1,488	Temporary ramp required
RWFX	Enfield North	The proposal is to create a new polling district comprised of properties on Old Park View, Millers Green Close and Wyndcroft Close.	The Formont Centre, Waverley Road	Slades Hill A110 is an arterial road which creates a boundary. The polling district enables the electors to attend a polling place to the south of Slades Hill. Electors in this area traditionally voted at St Mary Magdalene Church. The proposed polling place is conveniently located for the electors.	2 (one for RWFX and one for RWGY)	332	Yes
RWGY	Enfield Southgate	The proposal is to follow the parliamentary constituency boundary and new ward boundary.		This area is in a separate parliamentary constituency (Enfield Southgate) to the rest of Ridgeway (Enfield North) and therefore requires a separate polling district. No amendments suggested to polling place. No negative feedback reported from use at May 2021 elections.			

Southbury Ward - Polling Scheme 2022



Map Ref	Location of proposed Polling Place
PP80	Charles Babbage House
PP81	Ellenborough Table Tennis Club
PP82	Wheatsheaf Hall
PP83	John Jackson Library
PP84	Ayley Croft Community Hall

Key

- 2022 Ward Boundary
- 2010 Constituency Boundary
- Proposed Polling District boundary
- Proposed Polling Place

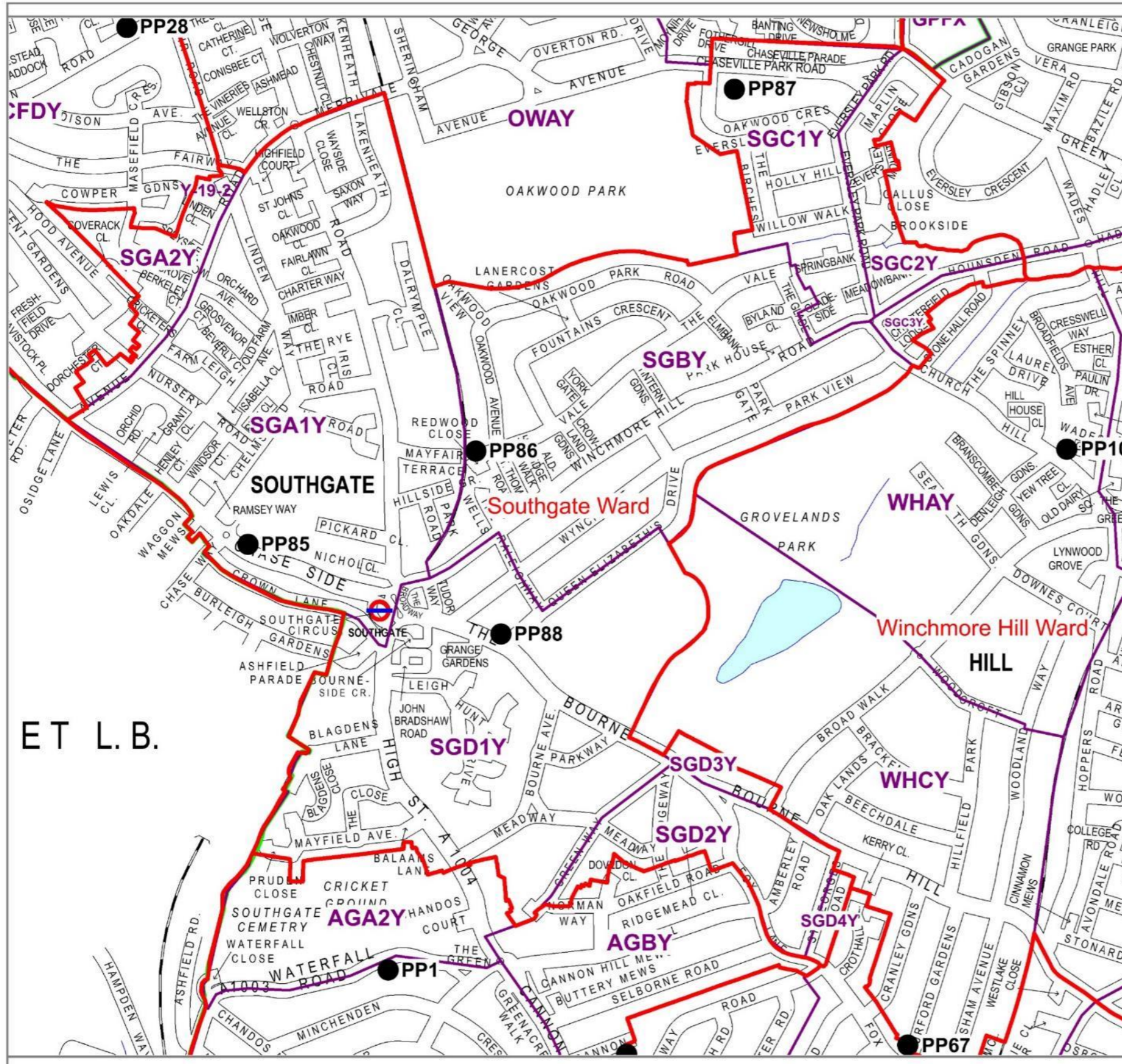
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Southbury – 3 councillors

Polling district identifier	Parliamentary constituency	Proposed polling district	Polling place	Justification	<i>Included for information purposes only</i>		
					No. of polling stations	Estimated in-person electors	Disabled access at polling place
SBA1X	Enfield North	The proposal is to follow the existing (2021) polling district boundaries and new ward boundary.	Charles Babbage House, Orton Grove	The LGBCE changes have not affected this polling district and the current boundaries remain appropriate. Electors in this area traditionally voted at Worcesters Primary School which is situated outside the ward boundaries. The proposed polling place is conveniently located for the electors. Accommodation will be found at Charles Babbage House which is a council asset. This area is currently in a different ward to SBA1X and SBA3X. It therefore requires a separate register until the May 2022 elections.	1	1,437	Yes
SBA2X	Enfield North	The proposal is to amend the existing (2021) southern polling district boundary to include properties on Ladysmith Road and Lambourne Gardens as shown on map and to follow the new ward boundaries.		Electors in this area traditionally voted at the Annexe Rear of Beacon of Light Church which is situated outside the ward boundaries. The proposed polling place is conveniently located for the electors as they have access via Carterhatch Lane. This area is currently in a different ward to SBA1X and SBA2X. It therefore requires a separate register until the May 2022 elections.			
SBA3X	Enfield North	The proposal is to follow the existing (2021) polling district boundaries and new ward boundary.		Electors in this area traditionally voted at Suffolks Primary School which is situated outside the ward boundaries. The proposed polling place is conveniently located for the electors.			
SBB1X	Enfield North	The proposal is to follow the existing (2021) polling district boundaries and new ward boundary.	Ellenborough Table Tennis Club, Craddock Road	The LGBCE changes have not affected this polling district and the current boundaries remain appropriate No amendments suggested to polling place. No negative feedback reported from use at the May 2021 elections. This area is currently in a different ward to SBB1X. It therefore requires a separate register until the May 2022 elections.	1	1,052	Yes
SBB2X	Enfield North	The proposal is to follow the existing (2021) polling district boundaries and new ward boundary.		Electors in this area traditionally voted at St. Andrew's C.E. School which is situated outside the ward boundaries. The proposed polling place is conveniently located for the electors.			
SBCX	Enfield North	The proposal is for the boundary to follow SBB1X proposed boundary at the north, Main Avenue at the south and east at the A10. The western boundary dissects Bush Hill Park and Hadrian's Ride.	Wheatsheaf Hall, Main Avenue	Electors in this area traditionally voted at John Jackson Library. Electors previously voting at Bush Hill Park Recreation Ground (Fellowship Hut) have been reallocated to SBDX/John Jackson Library. John Jackson Library is unable to accommodate two polling stations. The proposal is therefore to move electors in this area to Wheatsheaf Hall which is located close by. This is a new venue which has not previously been used as a polling place.	1	1,287	Yes
SBDX	Enfield North	The proposal is for the boundary to follow SBB1X proposed boundary at the north, Main Avenue at the south and west at the railway. The eastern boundary dissects Bush Hill Park and Hadrian's Ride.	John Jackson Library, Agricola Place	Electors north of Lincoln Road traditionally voted at Bush Hill Park Recreation Ground (Fellowship Hut). Negative feedback surrounding the lack of lighting on the entrance path and facilities in the polling place was received at the May 2021 elections. The proposal is to remove the Fellowship Hut and move these electors to John Jackson Library which is conveniently located and provides better facilities for voting. No negative feedback reported from use of this polling place at the May 2021 elections.	1	1,957	Yes

Polling district identifier	Parliamentary constituency	Proposed polling district	Polling place	Justification	<i>Included for information purposes only</i>		
					No. of polling stations	Estimated in-person electors	Disabled access
SBEX	Enfield North	The proposal is to follow the existing (2021) polling district boundaries.	Aley Croft Community Hall, Aley Croft	No amendments suggested. The LGBCE changes have not affected this polling district and the current boundaries remain appropriate.	2 (one for SBEX and one for SBFZ)	936	Yes
SBFZ	Edmonton	The proposal is to follow the existing (2021) polling district boundaries.		No negative feedback reported from use of the polling place at the May 2021 elections. This area is in a different parliamentary constituency (Edmonton) to the rest of Southbury ward (Enfield North) and therefore requires a separate polling district. The proposal is to reallocate electors who previously voted at Bush Hill Park United Reform Church to Aley Croft Community Hall. The proposed polling place is able to accommodate two polling stations, is accessible and is a community facility.		1,439	

Southgate Ward - Polling Scheme 2022



Map Ref	Location of proposed Polling Place
PP85	St. Andrew's Church (Southgate)
PP86	Southgate District Scout Headquarters
PP87	Eversley Primary School
PP88	Southgate Methodist Church Hall

Key	
	2022 Ward Boundary
	2010 Constituency Boundary
	Proposed Polling District boundary
	Proposed Polling Place

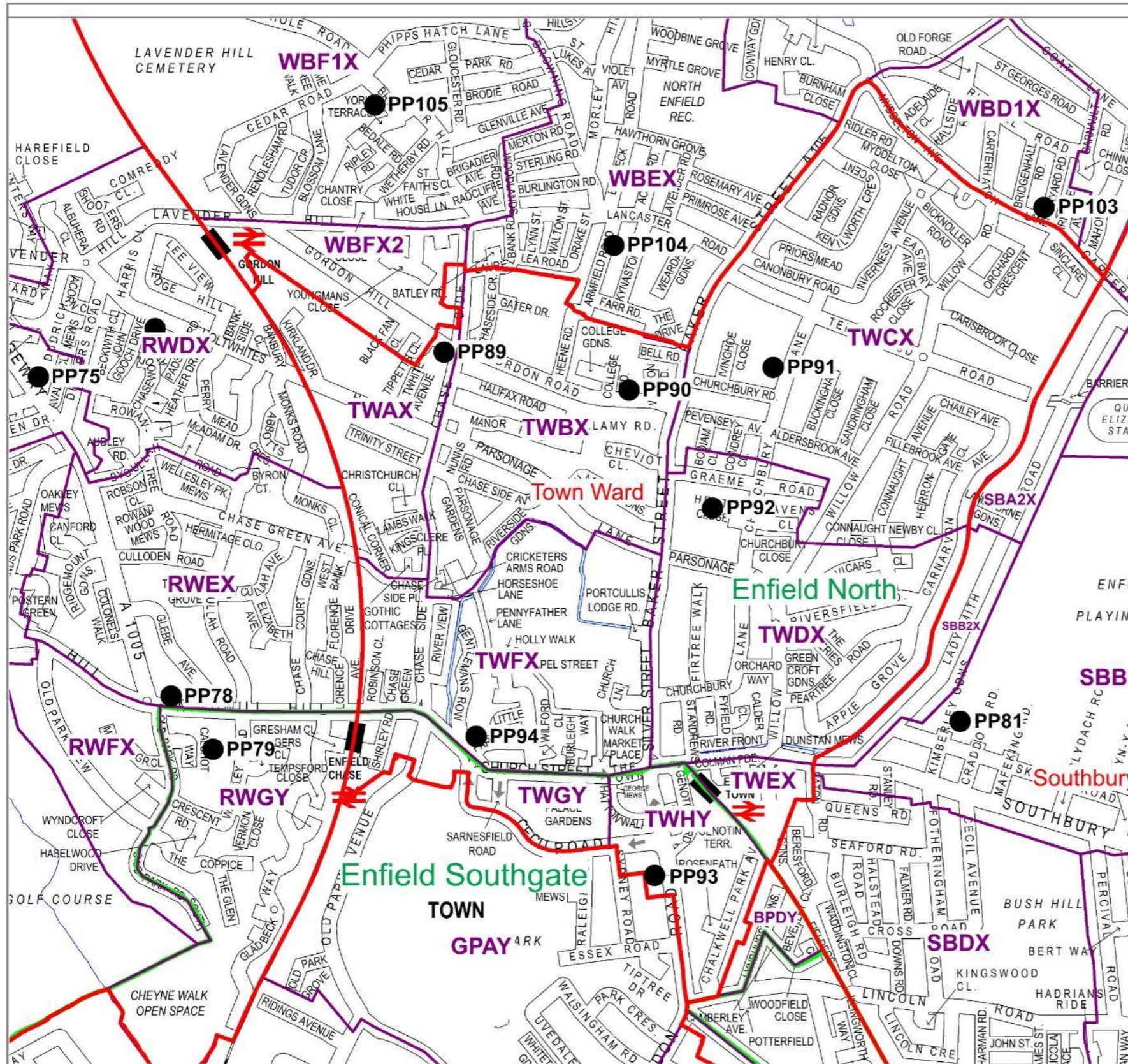
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Southgate - 3 councillors

					<i>Included for information purposes only</i>		
Polling district identifier	Parliamentary constituency	Proposed polling district	Polling place	Justification	No. of polling stations	Estimated in-person electors	Disabled access at polling place
SGA1Y	Enfield Southgate	The proposal is to follow the existing (2021) polling district boundaries.	St. Andrew`s Church (Southgate), Chase Side	No amendments suggested. Chase Road is a connecting road which runs through the polling district. No negative feedback reported from use of polling place at May 2021 elections. As the polling place electorate is above 2,500 two polling stations are recommended.	2	2,908	Temporary ramp required
SGA2Y	Enfield Southgate	The proposal is to follow the existing (2021) polling district boundary and new ward boundaries.		This area is currently in a different ward to SGA1Y. It therefore requires a separate register until the May 2022 elections. Electors in this area traditionally voted at 14 th Southgate Scout Headquarters which is situated outside the ward boundaries. The proposed polling place is conveniently located for the electors.			
SGBY	Enfield Southgate	The proposal is to amend the existing (2021) polling district boundary to include streets to the south-east of Winchmore Hill Road.	Southgate District Scout Headquarters, Redwood Close	Winchmore Hill Road is a connecting road which runs through the polling district. The LGBCE changes to the ward have required the reallocation of the electors to the south-east of Winchmore Hill Road as the previous polling place is outside the ward. No amendments suggested to polling place. No negative feedback reported from use of polling place at May 2021 elections.	1	1,821	Yes
SGC1Y	Enfield Southgate	The proposal is to follow the existing (2021) polling district boundaries.	Eversley Primary School, Chaseville Park Road	The LGBCE changes have not affected this polling district and the current boundaries remain appropriate. Negative feedback surrounding the lack of parking and entrance path was reported at the May 2021 elections. No suitable alternative venues have been identified.	1	957	Temporary ramp required
SGC2Y	Enfield Southgate	The proposal is to follow the existing (2021) polling district boundaries and new ward boundary.		This area is currently in a different ward to SGC1Y and SGC3Y. It therefore requires a separate register until the May 2022 elections. Electors in this area traditionally voted at St. Peter`s Church (Winchmore Hill) which is situated outside the ward boundaries. The proposed polling place is conveniently located for the electors.			
SGC3Y	Enfield Southgate	The proposal is to follow the existing (2021) polling district boundaries and new ward boundary.		This area is currently in a different ward to SGC1Y and SGC2Y. It therefore requires a separate register until the May 2022 elections. Electors in this area traditionally voted at Friends Meeting House which is situated outside the ward boundaries. The proposed polling place is conveniently located for the electors.			

Polling district identifier	Parliamentary constituency	Proposed polling district	Polling place	Justification	No. of polling stations	Estimated in-person electors	Disabled access at polling place
SGD1Y	Enfield Southgate	The proposal is to follow the existing (2021) polling district boundaries, with the exclusion of properties to the south-east of Winchmore Hill Road.	Southgate Methodist Church Hall, The Bourne	The Bourne is a connecting road which runs through the polling district. No amendments suggested to polling place. No negative feedback reported from use of polling place at May 2021 elections.	1	2,009	Yes
SGD2Y	Enfield Southgate	The proposal is to follow the existing (2021) polling district boundaries and new ward boundary.		This area is currently in a different ward to SGD1Y, SGD3Y and SGD4Y. It therefore requires a separate register until the May 2022 elections. Electors in this area traditionally voted at St Monica's Scout and Guide Headquarters which is situated outside the ward boundaries. The proposed polling place is conveniently located for the electors.			
SGD3Y	Enfield Southgate	The proposal is to follow the existing (2021) polling district boundaries and new ward boundary.		This area is currently in a different ward to SGD1Y, SGD2Y and SGD4Y. It therefore requires a separate register until the May 2022 elections. Electors in this area traditionally voted at Friends Meeting House which is situated outside the ward boundaries. The proposed polling place is conveniently located for the electors.			
SGD4Y	Enfield Southgate	The proposal is to follow the existing (2021) polling district boundaries and new ward boundary.		This area is currently in a different ward to SGD1Y, SGD2Y and SGD3Y. It therefore requires a separate register until the May 2022 elections. Electors in this area traditionally voted at Palmers Green United Reformed Church which is situated outside the ward boundaries. The proposed polling place is conveniently located for the electors.			

Town Ward - Polling Scheme 2022



Map Ref	Location of proposed Polling Place
PP89	St. Michael's and All Angels Parish Hall
PP90	4th Enfield Scout Group Headquarters
PP91	Chace Community School
PP92	St. Andrew's C.E. School
PP93	Our Lady of Mount Carmel and St. George R.C. Church
PP94	Trinity Church Hall (Enfield)

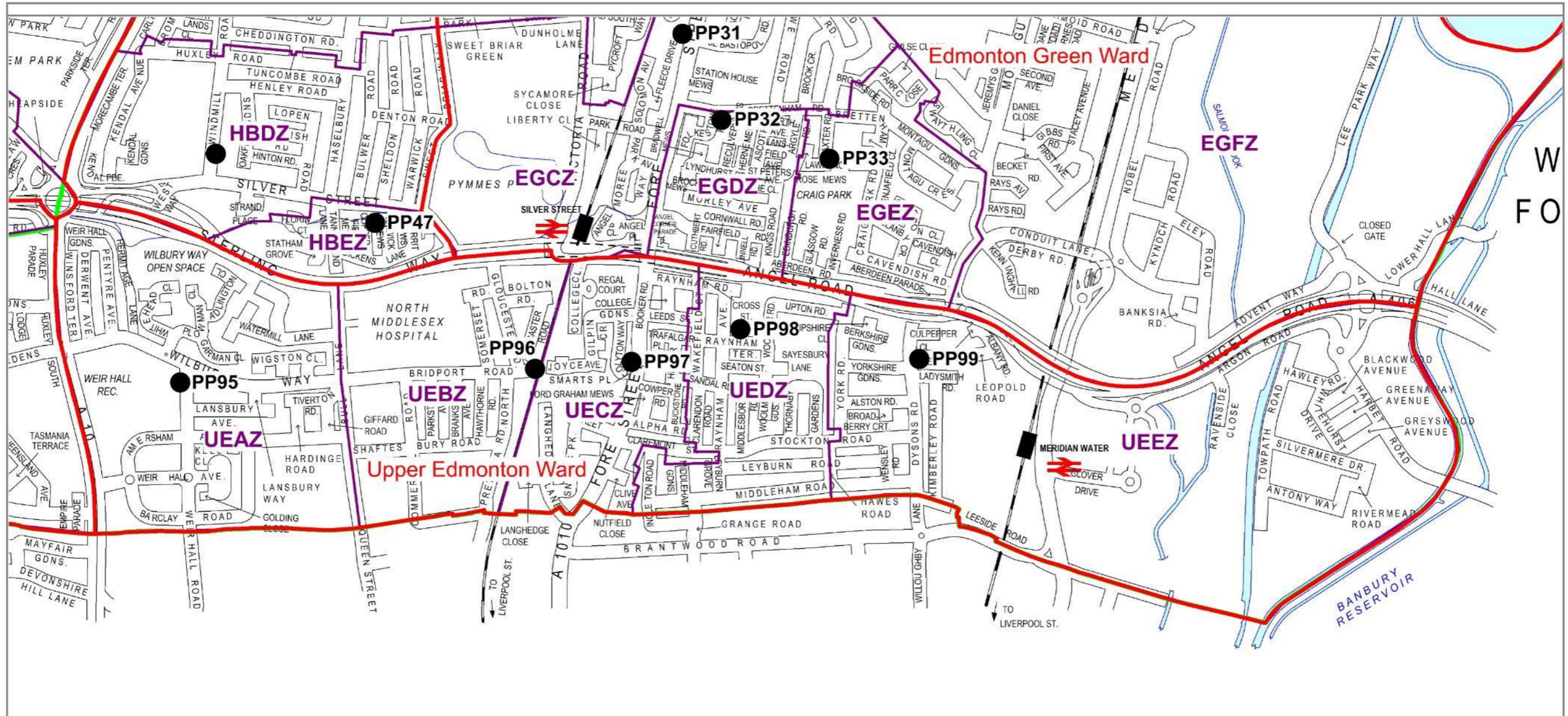
Key	
	2022 Ward Boundary
	2010 Constituency Boundary
	Proposed Polling District boundary
	Proposed Polling Place

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Town - 3 councillors

					<i>Included for information purposes only</i>		
Polling district identifier	Parliamentary constituency	Proposed polling district	Polling place	Justification	No. of polling stations	Estimated in-person electors	Disabled access at polling place
TWAX	Enfield North	The proposal is to follow the existing (2021) polling district boundaries and new ward boundary with the exclusion of properties on Robinson Close, Chase Green and Chase Side.	St. Michael's and All Angels Parish Hall, Gordon Hill	The polling district boundary provides for electors to the west of Chase Side. No amendments suggested to polling place. No negative feedback reported from use at May 2021 elections.	1	562	Yes
TWBX	Enfield North	The proposal is to follow the existing (2021) polling district boundaries.	4 th Enfield Scout Group Headquarters, Gordon Road	No amendments suggested. The LGBCE changes have not affected this polling district and the current boundaries remain appropriate. No negative feedback reported from use of polling place at May 2021 elections.	1	1,472	Temporary ramp required
TWCX	Enfield North	The proposal is to follow the existing (2021) polling district boundaries and new ward boundary.	Chace Community School, Churchbury Lane	The LGBCE alterations moved the ward boundary to the centre of Myddleton Avenue and Carterhatch Lane. The electors have been incorporated in the new polling district. No amendments suggested to polling place. No negative feedback reported from use at May 2021 elections. As the polling place electorate is above 2,500 two polling stations are recommended.	2	2,625	Yes
TWDX	Enfield North	The proposal is to follow the existing (2021) polling district boundaries and new ward boundary.	St. Andrew's C.E. School, Churchbury Lane	The LGBCE changes have only altered the eastern boundary of this polling district. No amendments suggested to polling place. No negative feedback reported from use at May 2021 elections.	1	1,428	Yes
TWEX	Enfield North	The proposal is to follow the new ward boundary, the railway and Southbury Road	Our Lady of Mount Carmel and St George R.C Church, London Road	The electors in this area traditionally voted at Ellenborough Table Tennis Club or Fellowship Hut (Bush Hill Park Recreation Ground) which are both situated outside the ward boundaries. The proposed polling place is conveniently located for electors. The polling place will require two polling stations serving two different wards.	2 (one for TWEX and one for TWHY) Note: Additional polling station at the venue for Grange Park Ward	224	Yes
TWHY	Enfield Southgate	The proposal is to follow the new ward boundary, the railway line, Church Street/Southbury Road and Hatton Walk		This area is in a different parliamentary constituency (Enfield Southgate) to the rest of Town ward (Enfield North) and therefore requires a separate polling district. No amendments suggested to polling place.			
TWFX	Enfield North	The proposal is to follow the existing (2021) polling district boundaries with the inclusion of properties on Robinson Close, Chase Green and Chase Side.	Trinity Church Hall (Enfield)	Properties on Robinson Close, Chase Green and Chase Side have convenient access to the polling place via Church Street. No amendments suggested to polling place. No negative feedback reported from use at May 2021 elections.	2 (one for TWFX and one for TWGY)	342	Temporary ramp required
TWGY	Enfield Southgate	The proposal is to follow the new ward boundary, Church Street and Hatton Walk.		This area is in a different parliamentary constituency (Enfield Southgate) to the rest of Town ward (Enfield North) and therefore requires a separate polling district. Electors in this area traditionally voted at Our Lady of Mount Carmel and St George R.C. Church. The proposed polling place is more conveniently located.			

Upper Edmonton Ward - Polling Scheme 2022



Map Ref	Location of proposed Polling Place
PP95	Wilbury Primary School
PP96	Temporary Building (Bridport Railway Bridge)
PP97	Fore Street Library
PP98	Raynham Primary School
PP99	West Lea School Annexe



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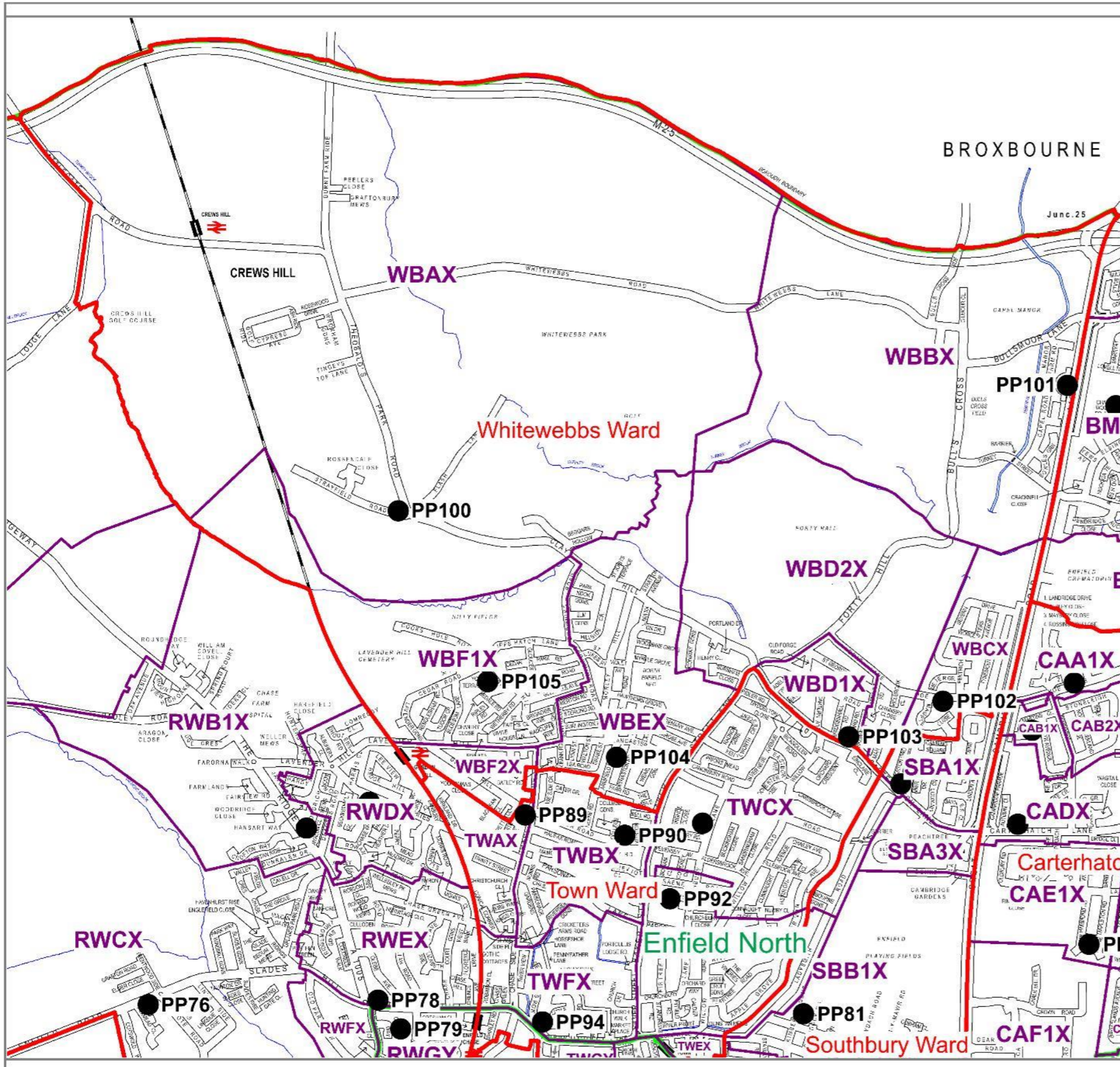
Key

- ▬ 2022 Ward Boundary
- ▬ 2010 Constituency Boundary
- ▬ Proposed Polling District boundary
- Proposed Polling Place

Upper Edmonton – 3 councillors

Polling district identifier	Parliamentary constituency	Proposed polling district	Polling place	Justification	Included for information purposes only		
					No. of polling stations	Estimated in-person electors	Disabled access at polling place
UEAZ	Edmonton	The proposal is to follow the existing (2021) polling district boundaries.	Wilbury Primary School, Wilbury Way	<p>No amendments suggested. Bull Lane creates a boundary with limited crossing points. The LGBCE changes have not affected this polling district and the current boundaries remain appropriate.</p> <p>No negative feedback reported from use of polling place at May 2021 elections. No suitable alternatives premises have been identified. As the polling place electorate is above 2,500 two polling stations are recommended.</p>	2	2,651	Temporary ramp required
UEBZ	Edmonton	The proposal is to follow the existing (2021) polling district boundaries.	Temporary Building (Bridport Road Railway Bridge), Bridport Road	<p>No amendments suggested. The railway line creates a boundary and there are very limited crossing points. The LGBCE changes have not affected this polling district and the current boundaries remain appropriate.</p> <p>No suitable permanent premises have been identified within the polling district. No negative feedback reported from use of polling place at May 2021 elections.</p>	1	874	Yes
UECZ	Edmonton	The proposal is to follow the existing (2021) polling district boundaries.	Fore Street Library, Fore Street	<p>No amendments suggested. The LGBCE changes have not affected this polling district and the current boundaries remain appropriate.</p> <p>No negative feedback reported from use of polling place at May 2021 elections.</p>	1	1,643	Yes
UEDZ	Edmonton	The proposal is to follow the existing (2021) polling district boundaries.	Raynham Primary School, Raynham Avenue	<p>No amendments suggested. The LGBCE changes have not affected this polling district and the current boundaries remain appropriate.</p> <p>No negative feedback reported from use of polling place at May 2021 elections. No suitable alternatives premises have been identified.</p>	1	1,537	Yes
UEEZ	Edmonton	The proposal is to follow the existing (2021) polling district boundaries.	West Lea School Annexe, Dysons Road	<p>No amendments suggested. The properties in this polling district are concentrated to the west of the railway line. The rest of the polling district is predominantly industrial land. The LGBCE changes have not affected this polling district and the current boundaries remain appropriate.</p> <p>Consideration has been given to the Meridian Water development. The first new homes are scheduled to be completed by the end of 2022. A further review of the polling districts in this ward will be required once the homes are occupied.</p> <p>No negative feedback reported from use of polling place at May 2021 elections. No suitable alternatives premises have been identified.</p>	1	1,240	Temporary ramp required

Whitewebbs Ward - Polling Scheme 2022



Map Ref	Location of proposed Polling Place
100	St. John's Church Hall
101	Temporary Building (Manor Court)
102	Temporary Building (Hoe Lane Flats)
103	Annexe Rear of Beacon of Light Church
104	Lancaster Road URC Church Hall
105	Brigadier Hall

Key

- 2022 Ward Boundary
- 2010 Constituency Boundary
- Proposed Polling District boundary
- Proposed Polling Place

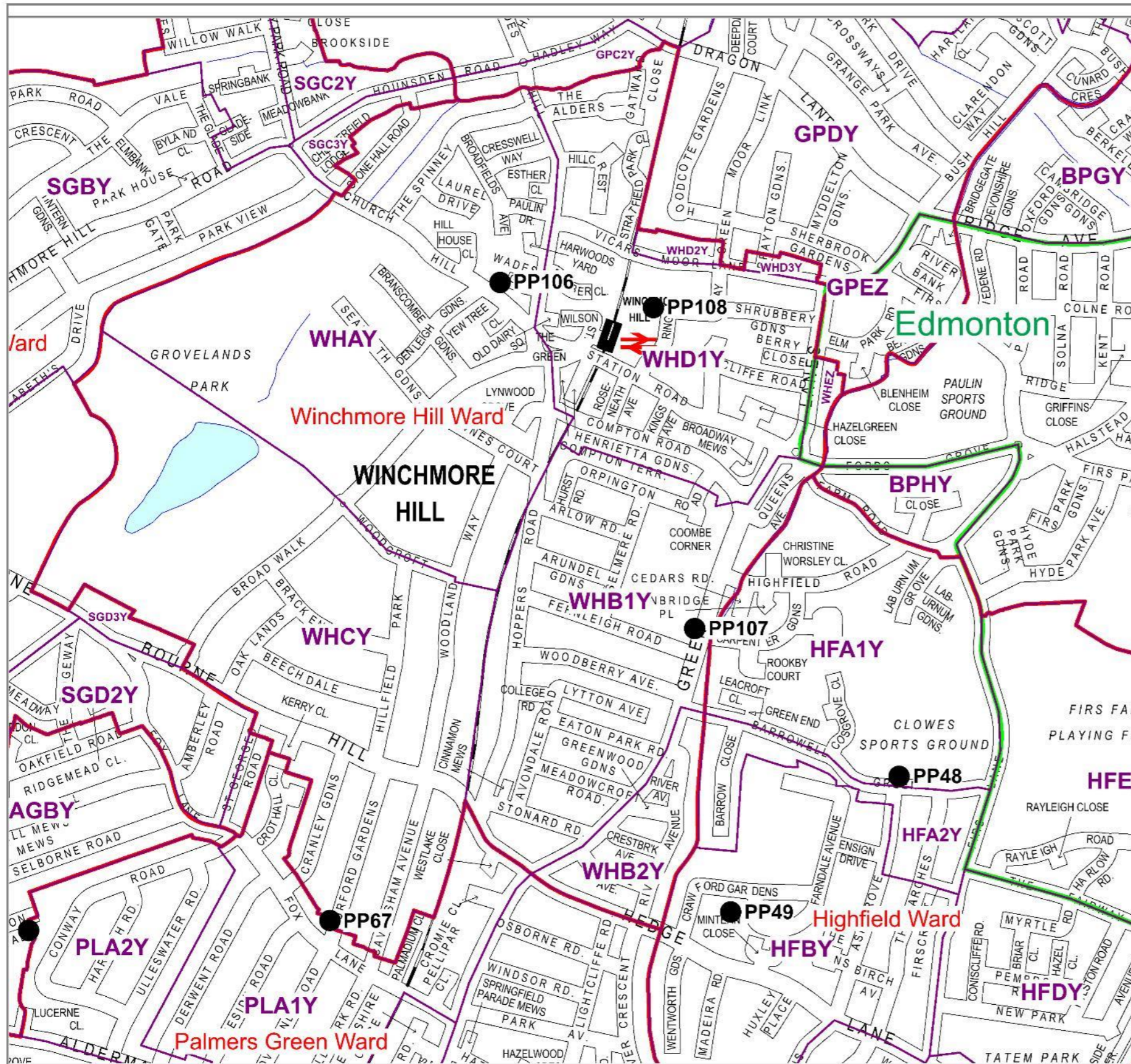
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Whitewebbs - 3 councillors

Polling district identifier	Parliamentary constituency	Proposed polling district	Polling place	Justification	<i>Included for information purposes only</i>		
					No. of polling stations	Estimated in-person electors	Disabled access at polling place
WBAX	Enfield North	The proposal is to follow the existing (2021) polling district boundary with the inclusion of properties on Cattlegate Road to the east of the railway line.	St. John's Church Hall, Clay Hill	Crews Hill is a hamlet which is distinct from the rest of Whitewebbs ward. The LGBCE ward change has moved a small number of properties along Cattlegate Road to the east of the railway line to Whitewebbs ward. No negative feedback reported from use of polling place at May 2021 elections.	1	402	Yes
WBBX	Enfield North	The proposal is to follow the existing (2021) polling district boundaries.	Temporary Building (Manor Court), Manor Court	No amendments suggested. The LGBCE changes have not affected this polling district and the current boundaries remain appropriate. The proposed polling place is centrally located for electors within the polling district. The proposal is to place a temporary unit on Manor Court which will eliminate the need for Orchardside School and the disruption to pupils, parents and teachers.	1	482	Yes
WBCX	Enfield North	The proposal is follow the New River and the new ward boundaries.	Temporary Building (Hoe Lane Flats), Hoe Lane	The New River is a natural boundary which separates these properties from the rest of the ward. Electors in this area traditionally voted at Worcesters Primary School. The proposal is to place a temporary unit on Hoe Lane Open Space which will eliminate the need for the school and the disruption to pupils, parents and teachers.	1	1,015	Yes
WBD1X	Enfield North	The proposal is to follow the existing (2021) polling district boundaries and ward boundary.	Annexe Rear of Beacon of Light Church, Layard Road	This area is currently in a separate ward to WBD2X. It will therefore require a separate register until the May 2022 elections. No amendments suggested to polling place.	1	1,371	Yes
WBD2X	Enfield North	The proposal is to follow New River and the existing (2021) polling district boundaries with the addition of properties on Burnham Close, Henry Close, Portland Drive, Conway Gardens, 450-480 Baker Street and 2-54 Clay Hill.		The LGBCE changes moves the Beacon of Light Church into the ward. Electors in this area traditionally voted at Worcesters Primary School or Lancaster Road URC Church Hall. The proposal recommends replacing the school with the Beacon of Light Church which will benefit pupils, parents and teachers. The proposed polling place is conveniently located for the electors. Some negative feedback surrounding the size of the polling station room was reported at the May 2021 elections. No suitable alternative venues have been identified.			
WBEX	Enfield North	The proposal is to amend the existing polling district boundaries to exclude properties moved to WBD1X and to include properties south of Merton Road.	Lancaster Road URC Church Hall, Armfield Road	The electors who have been reallocated to this polling district traditionally voted at Brigadier Hall. The proposed polling place is more conveniently located for these electors as they have easy access via Browning Road/Lancaster Road. No negative feedback reported from use of polling place at May 2022 elections.	1	2,258	Yes

Polling district identifier	Parliamentary constituency	Proposed polling district	Polling place	Justification	No. of polling stations	Estimated in-person electors	Disabled access at polling place
WBF1X	Enfield North	The proposal is to amend the existing (2021) polling district boundaries to exclude properties reallocated to WBEX.	Brigadier Hall, Brigadier Hill	<p>The polling district provides for a centrally located polling place.</p> <p>Brigadier Hall was unavailable at the May 2021 elections due to its use as a Covid-19 testing centre. The replacement venue was St. Luke's Church. It is recommended that there is a return to Brigadier Hall as this venue is more centrally located within the polling district. Some negative feedback surrounding disabled access was reported the last time the polling place was used at the 2019 parliamentary elections. The venue has been used as a Covid-19 testing centre and offers a permanent ramp for disabled access.</p>	1	2,046	Yes
WBF2X	Enfield North	The proposal is to follow the existing (2021) polling district boundaries and new ward boundary.		<p>As this area is currently in a separate ward to WBF1X, it will require a separate register until the May 2022 elections.</p> <p>Electors in this area previously voted at St. Michael's and All Angels Parish Hall which is situated in Town Ward. The proposed polling place is conveniently located for electors in this area.</p>			

Winchmore Hill Ward - Polling Scheme 2022



Map Ref	Location of proposed Polling Place
PP67	Palmers Green United Reformed Church
PP 106	Friends Meeting House
PP 107	Winchmore Hill Library
PP 108	St. Paul's C.E. Primary School

Key

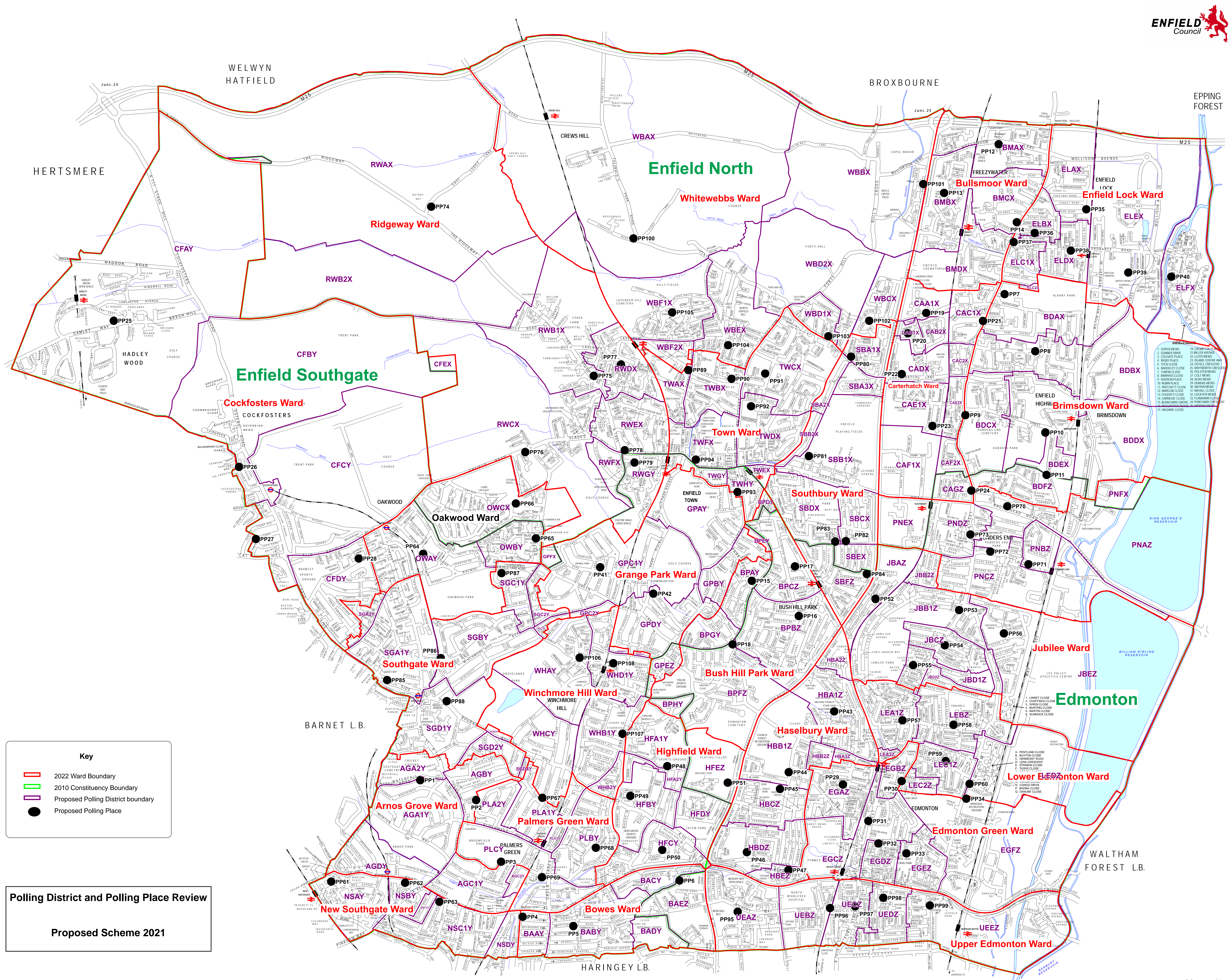
- 2022 Ward Boundary
- 2010 Constituency Boundary
- Proposed Polling District boundary
- Proposed Polling Place

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Winchmore Hill – 2 councillors

Polling district identifier	Parliamentary constituency	Proposed polling district	Polling place	Justification	Included for information purposes only		
					No. of polling stations	Estimated in-person electors	Disabled access at polling place
WHAY	Enfield Southgate	The proposal is to follow the existing boundaries to the north, east and west. The southern boundary will be moved to run west to east along Woodcroft.	Friends Meeting House, Church Hill	The polling district provides for a centrally located polling place. Negative feedback surrounding the lack of parking was reported at the May 2021 elections. No suitable alternative premises have been identified.	1	868	Yes
WHB1Y	Enfield Southgate	The proposal is to follow the existing (2021) polling district boundaries and new ward boundary.	Winchmore Hill Library, Green Lanes	The LGBCE changes have not affected this polling district and the current boundaries remain appropriate Negative feedback surrounding the lack of parking was reported at the May 2021 elections. No suitable alternative premises have been identified.	1	2,133	Yes
WHB2Y	Enfield Southgate	The proposal is to follow the existing (2021) polling district boundaries and new ward boundaries.		This area is currently in a different ward to WHB1Y. It therefore requires a separate register until the May 2022 elections. Electors in this area traditionally voted at The Broomfield Club which is situated outside the ward boundaries. The proposed polling place is conveniently located for electors in this area.			
WHCY	Enfield Southgate	The proposal is to follow the new ward boundary, the railway and along Woodcroft.	Palmers Green United Reformed Church, Burford Road	There are limited venues suitable for polling stations within this polling district. The proposal reallocates electors south of Woodcroft to Palmers Green United Reformed Church. The proposed polling place is situated in Palmers Green ward. No suitable polling place has been identified within the ward boundaries. The polling place will require two polling stations serving two wards. No negative feedback reported from use of polling place at May 2021 elections.	1 Note: Additional polling station at the venue for Palmers Green Ward	1,230	Yes
WHD1Y	Enfield Southgate	The proposal is to follow the existing (2021) polling district boundaries and new ward boundaries.	St. Paul's C.E. Primary School, Ringwood Way	The LGBCE changes have not affected this polling district and the current boundaries remain appropriate. No negative feedback was reported from use of polling place at May 2021 elections.	2 (one for WHD1Y, WHD2Y and WHD3Y and one for WHEZ)	1,305	Yes
WHD2Y	Enfield Southgate	The proposal is to follow the existing (2021) polling district boundaries and new ward boundaries.		These areas are currently in a different ward to WHD1Y. They therefore require a separate register until the May 2022 elections. WHD2Y and WHD3Y are currently in the same ward but they have been split by the new ward boundary.			
WHD3Y	Enfield Southgate	The proposal is to follow the existing (2021) polling district boundaries and new ward boundaries.		Electors in this area traditionally voted at Grange Park Methodist Church Hall which is outside the ward boundaries. The proposed polling place is conveniently located for the electors.			
WHEZ	Edmonton	The proposal is to follow the parliamentary constituency boundaries and new ward boundaries.		This area is in a different parliamentary constituency (Edmonton) to the rest of Winchmore Hill Ward (Enfield Southgate) and therefore requires a separate polling district and station. Electors in this area traditionally voted at Ridge Avenue Library which is situated outside the ward boundaries. The proposed polling place is conveniently located for electors in this area.			

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Key

- 2022 Ward Boundary
- 2010 Constituency Boundary
- Proposed Polling District boundary
- Proposed Polling Place

Polling District and Polling Place Review
Proposed Scheme 2021

- Polling Place Map Reference**
- PP1 Christ Church Southgate
 - PP2 St. Monica's Scout and Guide Headquarters
 - PP3 Temporary Building (Broomfield Park)
 - PP4 Trinity at Bowes Methodist Church Hall
 - PP5 Tottenham Infants School
 - PP6 Wilkinson Hall
 - PP7 St. Hellier Hall
 - PP8 St. Barnabas Hall
 - PP9 Enfield Highway Community Centre
 - PP10 Brimsdown Primary School
 - PP11 28th Enfield Scout Hut
 - PP12 Temporary Building (Lea Valley Academy)
 - PP13 Kempe Hall
 - PP14 St. George's Church
 - PP15 St. Stephen's Hall
 - PP16 Bush Hill Park Methodist Church Hall
 - PP17 Bush Hill Park Bowls, Tennis & Social Club
 - PP18 Ridge Avenue Library
 - PP19 Temporary Building (Hoe Lane Open Space)
 - PP20 Boleyn Hall
 - PP21 The Dharma Centre
 - PP22 Carterhatch Infant School
 - PP23 Temporary Building (Broadfield Square)
 - PP24 Ponders End Methodist Church
 - PP25 St. Paul's Church
 - PP26 Southgate Compton Cricket Club
 - PP27 Freston Hall
 - PP28 14th Southgate Scout Headquarters
 - PP29 Memorial Hall
 - PP30 Green Towers Community Centre
 - PP31 Faith House (Edmonton United Reformed Church)
 - PP32 Brettenham School Nursery
 - PP33 Unity Hub @ Craig Park
 - PP34 Edmonton Eagles Amateur Boxing Club
 - PP35 Temporary Building (Park Road Flats)
 - PP36 Totteridge Road Baptist Church Hall
 - PP37 Ordnance Unity Centre Library
 - PP38 St. Peter and St. Paul Church Hall
 - PP39 Prince of Wales School
 - PP40 Enfield Island Community Centre
 - PP41 St. Peter's Church Hall (Winchmore Hill)
 - PP42 Grange Park Methodist Church Hall
 - PP43 Churchfield Primary School
 - PP44 Temporary Building (Latmyer School)
 - PP45 Hazelbury Primary School
 - PP46 St. Adhelm's Church Hall
 - PP47 Klinger Hall
 - PP48 Northampton Exiles Cricket Club
 - PP49 The Broomfield Club
 - PP50 Mayfield Athletic Club
 - PP51 Firs Farm School
 - PP52 Temporary Building (Lee Road Open Space)
 - PP53 St. Alphege Church Hall
 - PP54 Tramway Christian Fellowship
 - PP55 Houndsfield Primary School
 - PP56 Nottingham Hall
 - PP57 St. Edmund's Church Hall
 - PP58 St. Peter's Church Hall (Edmonton)
 - PP59 St. Demetrios Church Hall
 - PP60 Temporary Building (Montagu Road)
 - PP61 St. Paul's Parish Hall (New Southgate)
 - PP62 Bowes Road Library
 - PP63 Bowes Primary School
 - PP64 St. Thomas' Church (Oakwood)
 - PP65 Highlands Village Hall
 - PP66 Temporary Building (Lonsdale Drive)
 - PP67 Palmers Green United Reformed Church
 - PP68 Hazelwood Schools
 - PP69 Palmers Green Library
 - PP70 The Royal British Legion
 - PP71 Ponders End Youth Centre
 - PP72 Ponders End Working Mens Club
 - PP73 Ponders End Library
 - PP74 Botany Bay Cricket Club
 - PP75 Enfield Lawn Tennis Club
 - PP76 Temporary Building (Binocote Road/Foxmead Close)
 - PP77 Our Lady of Walsingham Church
 - PP78 St. Mary Magdalene Church
 - PP79 The Formentor Centre
 - PP80 Charles Babbage House
 - PP81 Ellenborough Table Tennis Club
 - PP82 Wheatsheaf Hall
 - PP83 John Jackson Library
 - PP84 Ayley Croft Community Hall
 - PP85 St. Andrew's Church (Southgate)
 - PP86 Southgate District Scout Headquarters
 - PP87 Eversley Primary School
 - PP88 Southgate Methodist Church Hall
 - PP89 St. Michael's and All Angels Parish Hall
 - PP90 4th Enfield Scout Group Headquarters
 - PP91 Chace Community School
 - PP92 St. Andrew's C.E. School
 - PP93 Our Lady of Mount Carmel and St. George R.C. Church
 - PP94 Trinity Church Hall (Enfield)
 - PP95 Wilbury Primary School
 - PP96 Temporary Building (Bridport Road)
 - PP97 Fore Street Library
 - PP98 Raynham Primary School
 - PP99 West Lea School Annexe
 - PP100 St. John's Church Hall
 - PP101 Temporary Building (Manor Court)
 - PP102 Temporary Building (Hoe Lane Flats)
 - PP103 Annexe Rear of Beacon of Light Church
 - PP104 Lancaster Road URC Church Hall
 - PP105 Brigadier Hall
 - PP106 Friends Meeting House
 - PP107 Winchmore Hill Library
 - PP108 St. Paul's C.E. Primary School

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Ward	Polling district	Electorate as at Nov 2021	% Postal voters	In-person electors
Arnos Grove	AGA1Y	2024	33.65%	1343
Arnos Grove	AGA2Y	253	28.07%	182
Arnos Grove	AGBY	1124	27.27%	817
Arnos Grove	AGC1Y	1635	28.50%	1169
Arnos Grove	AGC2Y	165	24.30%	125
Arnos Grove	AGDY	1128	28.73%	804
Bowes	BAAY	1156	19.78%	927
Bowes	BABY	3533	25.11%	2646
Bowes	BACY	639	27.11%	466
Bowes	BADY	236	21.10%	186
Bowes	BAEZ	1650	24.32%	1249
Brimsdown	BDAX	1971	23.14%	1515
Brimsdown	BDBX	2839	22.92%	2188
Brimsdown	BDCX	1604	24.82%	1206
Brimsdown	BDDX	2317	22.87%	1787
Brimsdown	BDEX	754	21.40%	593
Brimsdown	BDFZ	1167	23.67%	891
Bullsmoor	BMAX	1832	28.90%	1303
Bullsmoor	BMBX	2164	21.72%	1694
Bullsmoor	BMCX	1736	22.17%	1351
Bullsmoor	BMDX	1822	24.19%	1381
Bush Hill Park	BPAY	868	27.36%	631
Bush Hill Park	BPBZ	3265	25.44%	2434
Bush Hill Park	BPCZ	1578	26.73%	1156
Bush Hill Park	BPDY	155	27.36%	113
Bush Hill Park	BPEY	100	27.36%	73
Bush Hill Park	BPFZ	2878	29.94%	2016
Bush Hill Park	BPGY	648	21.98%	506
Bush Hill Park	BPHY	337	22.46%	261
Carterhatch	CAA1X	559	24.19%	424
Carterhatch	CAA2X	32	24.86%	24
Carterhatch	CAB1X	418	24.86%	314
Carterhatch	CAB2X	546	24.19%	414
Carterhatch	CAC1X	1314	24.19%	996
Carterhatch	CAC2X	800	24.86%	601
Carterhatch	CADX	751	24.86%	564
Carterhatch	CAE1X	1070	23.53%	818
Carterhatch	CAE2X	737	24.82%	554
Carterhatch	CAF1X	57	22.66%	44
Carterhatch	CAF2X	505	24.82%	380
Carterhatch	CAGZ	614	17.20%	508
Cockfosters	CFAY	2245	29.95%	1573

Cockfosters	CFBY	648	35.25%	420
Cockfosters	CFCY	2303	31.58%	1576
Cockfosters	CFDY	2342	27.87%	1689
Cockfosters	CFEX	0	0.00%	0
Edmonton Green	EGAZ	2944	22.57%	2280
Edmonton Green	EGBZ	977	23.94%	743
Edmonton Green	EGCZ	2605	21.18%	2053
Edmonton Green	EGDZ	1391	19.29%	1123
Edmonton Green	EGEZ	1867	18.43%	1523
Edmonton Green	EGFZ	798	18.70%	649
Enfield Lock	ELAX	1708	22.58%	1322
Enfield Lock	ELBX	950	20.28%	757
Enfield Lock	ELC1X	1373	23.22%	1054
Enfield Lock	ELC2X	44	28.90%	31
Enfield Lock	ELDX	1966	18.79%	1597
Enfield Lock	ELEX	2916	24.67%	2197
Enfield Lock	ELFX	2299	18.49%	1874
Grange Park	GPAY	1448	23.68%	1105
Grange Park	GPBY	514	27.36%	373
Grange Park	GPC1Y	2409	28.31%	1727
Grange Park	GPC2Y	90	27.71%	65
Grange Park	GPDY	1695	25.15%	1269
Grange Park	GPEZ	426	29.94%	298
Grange Park	GPFX	0	0.00%	0
Haselbury	HBA1Z	3000	21.41%	2358
Haselbury	HBA2Z	361	22.70%	279
Haselbury	HBA3Z	111	22.57%	86
Haselbury	HBB1Z	2013	19.04%	1630
Haselbury	HBB2Z	365	22.57%	283
Haselbury	HBCZ	2016	22.22%	1568
Haselbury	HBDZ	2970	21.59%	2329
Haselbury	HBEZ	716	19.89%	574
Highfield	HFA1Y	804	22.46%	623
Highfield	HFA2Y	535	26.20%	395
Highfield	HFBY	1761	26.20%	1300
Highfield	HFCY	2087	24.76%	1570
Highfield	HFDY	1177	24.56%	888
Highfield	HFEZ	530	26.02%	392
Jubilee	JBAZ	863	22.70%	667
Jubilee	JBB1Z	3104	22.09%	2418
Jubilee	JBB2Z	741	23.30%	568
Jubilee	JBCZ	1696	19.99%	1357
Jubilee	JBD1Z	1181	23.61%	902
Jubilee	JBD2Z	488	20.46%	388

Jubilee	JBEZ	2387	20.20%	1905
Lower Edmonton	LEA1Z	3049	18.44%	2487
Lower Edmonton	LEA2Z	102	20.46%	81
Lower Edmonton	LEA3Z	24	23.61%	18
Lower Edmonton	LEBZ	3782	20.46%	3008
Lower Edmonton	LEC1Z	1986	20.91%	1571
Lower Edmonton	LEC2Z	268	23.94%	204
Lower Edmonton	LEDZ	1418	17.63%	1168
New Southgate	NSAY	2069	24.51%	1562
New Southgate	NSBY	641	28.73%	457
New Southgate	NSC1Y	3583	26.45%	2635
New Southgate	NSC2Y	406	28.73%	289
New Southgate	NSDY	847	19.78%	679
Oakwood	OWAY	2757	27.68%	1994
Oakwood	OWBY	1392	25.24%	1041
Oakwood	OWCX	2234	30.38%	1555
Palmers Green	PLA1Y	1751	24.17%	1328
Palmers Green	PLA2Y	1013	27.27%	737
Palmers Green	PLA3Y	389	24.30%	294
Palmers Green	PLBY	2626	22.77%	2028
Palmers Green	PLCY	1608	24.30%	1217
Ponders End	PNAZ	1937	23.67%	1479
Ponders End	PNBZ	1014	22.07%	790
Ponders End	PNCZ	2665	19.71%	2140
Ponders End	PNDZ	1625	23.30%	1246
Ponders End	PNEX	250	22.84%	193
Ponders End	PNFX	0	0.00%	0
Ridgeway	RWAX	120	35.59%	77
Ridgeway	RWB1X	1629	29.19%	1153
Ridgeway	RWB2X	28	24.47%	21
Ridgeway	RWCX	2026	28.73%	1444
Ridgeway	RWDX	1842	27.07%	1343
Ridgeway	RWEX	2113	29.57%	1488
Ridgeway	RWFX	466	28.73%	332
Ridgeway	RWGY	1313	24.87%	986
Ridgeway	RWHY	0	0.00%	0
Southbury	SBA1X	1417	24.16%	1075
Southbury	SBA2X	415	23.87%	316
Southbury	SBA3X	60	23.53%	46
Southbury	SBB1X	1019	22.66%	788
Southbury	SBB2X	372	28.92%	264
Southbury	SBCX	1668	22.84%	1287
Southbury	SBDX	2540	22.95%	1957
Southbury	SBEX	1155	18.99%	936

Southbury	SBFZ	1851	22.28%	1439
Southgate	SGA1Y	3536	27.58%	2561
Southgate	SGA2Y	481	27.87%	347
Southgate	SGBY	2456	25.86%	1821
Southgate	SGC1Y	894	28.47%	639
Southgate	SGC2Y	327	28.31%	234
Southgate	SGG3Y	120	30.41%	84
Southgate	SGD1Y	2081	28.07%	1497
Southgate	SGD2Y	583	27.27%	424
Southgate	SGD3Y	35	30.41%	24
Southgate	SGD4Y	85	24.17%	64
Town	TWAX	748	24.93%	562
Town	TWBX	1969	25.25%	1472
Town	TWCX	3718	29.39%	2625
Town	TWDX	2009	28.92%	1428
Town	TWEX	290	22.75%	224
Town	TWFX	477	28.30%	342
Town	TWGY	131	23.68%	100
Town	TWHY	351	25.52%	261
Upper Edmonton	UEAZ	3283	19.24%	2651
Upper Edmonton	UEBZ	1105	20.86%	874
Upper Edmonton	UECZ	2052	19.93%	1643
Upper Edmonton	UEDZ	1971	22.00%	1537
Upper Edmonton	UEEZ	1482	16.36%	1240
Whitewebbs	WBAX	574	29.91%	402
Whitewebbs	WBBX	619	22.15%	482
Whitewebbs	WBCX	1338	24.16%	1015
Whitewebbs	WBD1X	926	23.87%	705
Whitewebbs	WBD2X	878	24.16%	666
Whitewebbs	WBEX	3012	25.02%	2258
Whitewebbs	WBF1X	2084	24.47%	1574
Whitewebbs	WBF2X	629	24.93%	472
Winchmore Hill	WHAY	1247	30.41%	868
Winchmore Hill	WHB1Y	2299	25.13%	1721
Winchmore Hill	WHB2Y	558	26.20%	412
Winchmore Hill	WHCY	1692	27.29%	1230
Winchmore Hill	WHD1Y	1647	25.01%	1235
Winchmore Hill	WHD2Y	41	25.15%	31
Winchmore Hill	WHD3Y	52	25.15%	39
Winchmore Hill	WHEZ	41	29.94%	29

Appendix 4 – List of consultees

Individual/Body/Organisation	Consultation Process
LBE residents	Publication of notice of review plus related documentation on the LBE website https://new.enfield.gov.uk/services/councillors-and-democracy/polling-districts-and-polling-places-review/ and at Enfield Civic Centre
LBE councillors	Notification via email with link to the Polling District & Polling Place Review webpage on LBE website
Agents for candidates and political parties who have stood in elections in LBE in recent years	Notification via email with link to the Polling District & Polling Place Review webpage on LBE website
Member of Parliament for Enfield North – Feryal Clark MP	Notification via email with link to the Polling District & Polling Place Review webpage on LBE website
Member of Parliament for Enfield Southgate - Bambos Charalambous MP	Notification via email with link to the Polling District & Polling Place Review webpage on LBE website
Member of Parliament for Edmonton – Kate Osamor MP	Notification via email with link to the Polling District & Polling Place Review webpage on LBE website
Greater London Assembly (GLA) Member for Enfield and Haringey - Joanne McCartney AM	Notification via email with link to the Polling District & Polling Place Review webpage on LBE website
Enfield Staff Disability Working Group	Notification via email with link to the Polling District & Polling Place Review webpage
Enfield Third Sector organisations/community groups	Notification via email with link to the Polling District & Polling Place Review webpage / notification via Community Sector Bulletin
Members of Enfield's Faith Forum	Notification via email with link to the Polling District & Polling Place Review webpage

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Appendix 5 - Summary of representations received in the polling district & polling place review consultation

The tables below provide a summary of all representations received in the polling district & polling place review consultation organised in alphabetical ward order. Where possible, representations have been reproduced exactly as received. However, where this is not practicable due to the length of the submission the key points have been summarised instead. In order to comply with GDPR principles, some street names have been redacted to avoid identification of individuals.

In addition to the responses outlined below, an additional seven responses were received where the respondent left no comments.

Any responses received which were outside/partially outside the scope of the consultation are detailed at the end of the document.

Arnos Grove

Reference Number	Respondent type	Representation	Proposal information
R1	Resident	<p>The new Arnos Grove district looks like a shambles and divides areas which should be within 1 polling district into 2 or more. Terrible decision.</p> <p>The proposed polling station at Palmer's Green library for Arnos Grove ward isn't even in the ward! The eastern half of this new ward seems to be worse off with regard to polling stations. More polling stations needed</p>	<p>The changes made by the LGBCE produced numerous areas where the polling place covers two or more of the current ward areas. Separate polling districts have been created to enable the provision of electoral registers to sitting members prior to the elections in May 2022. These polling districts will be merged after the election.</p> <p>The siting of a temporary building at Broomfield Park to be investigated for suitability, convenience and accessibility.</p>

Bowes

No representations received.

Brimsdown

Reference Number	Respondent type	Representation	Proposal information
R2	Member of Parliament for Enfield North – Feryal Clark MP	The proposals to Brimsdown ward are very limited, with no polling places changing and only the Z-3-6 polling district being brought across from Ponders End Ward and its polling place changing. Given these limited changes and the fact that there was no negative feedback reported at the May 2021 elections I am in favour of the proposals. However, due to the polling district Z-3-6 being taken into the ward, and having a new polling place, I would request that those roads gained are heavily reminded that their polling place has now moved to the 28 th Scout Hut.	The request for a comprehensive publicity campaign to remind electors who were previously in Ponders End ward that their polling place has changed will be passed to the Electoral Services team.

Bullsmoor

Reference Number	Respondent type	Representation	Proposal information
R3	Cllr Nesil Caliskan, Leader of the Council	<p>The people south of Turkey Street would be required to walk past the library on the approach to polling station 13 which is a longer distance. The roads around and south of Turkey Street should vote at Ordnance Unity Centre Library (35).</p>	<p>The proposals set out in Appendix 1 recommend the creation of a new polling district (BMDX) comprised of properties south of Turkey Street and properties on Teal Close, Gilbert Street, Dairy Close, Amhurst Close, Meadway, Waltham Gardens, Unity Road and Keswick Drive (partial). The proposed polling place for these electors is Ordnance Unity Centre Library.</p>
R4	Member of Parliament for Enfield North, Feryal Clark, MP	<p>Under the proposals, residents in the polling district X-4-3 will be required to vote at Freezywater St. George's CE VA Primary School. Given the current number of electors (and therefore pressure on the polling place), the distance those who live south of Turkey Street would have to travel to vote, the distinctive geographical communities south and north of Turkey Street, and the fact that the proposed polling place is a school, I propose to split this polling district into two, thereby creating X-4-3A and X-4-3B. X-4-3A would be all the roads originally in X-4-3A north of Turkey Street not including Teal Close and X-4-3B all the roads south of Turkey Street and including Teal Close.</p> <p>I would propose for X-4-3A's polling place to be a temporary unit in the Lidl carpark on Hertford Road as it is accessible, on a main road and avoids the need for Freezywater St. George's CE VA Primary School needing to be used as a polling place.</p>	<p>Please see information above on the proposed polling districts for Bullsmoor.</p> <p>In order to avoid the need for Freezywater St. George's CE VA Primary School to be used as a polling place, the proposals recommend the use of St. George's Church which is situated nearby. Initial investigations were made into the siting of a temporary unit polling station on Lidl car park,</p>

		<p>I would propose for the newly created X-4-3B's polling place to be a temporary unit on the land next to Turkey Street Station on Teal Close. This would allow commuters in X-4-3B to easily vote on their way to work. This location also has parking facilities and could easily be made accessible.</p> <p>While these are two suggestions for polling places, I am flexible on their location should you have alternative proposals. In terms of the other polling districts and places in Bullsmoor ward I agree with your proposals, they provide accessible polling places with good transport links and polling districts that keep the community ties of the ward intact.</p>	<p>Hertford Road. It was concluded that the costs would be prohibitive.</p> <p>Investigations were made into the siting of a temporary unit polling station on the land next to Turkey Street station, Teal Close. It was concluded that the area was unsuitable due to the unevenness of the site and the lack of space for the low loading van to deliver the temporary unit.</p>
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Bush Hill Park

No representations received.

Carterhatch

Reference Number	Respondent type	Representation	Proposal information
R5	Member of Parliament for Enfield North, Feryal Clark MP	<p>Having reviewed the polling districts and places I would suggest one change to Carterhatch ward in that the polling place X-6-1A and X-6-1B changes. This is due to the fact the proposed facility does not have good parking facilities which are needed for our disabled and elderly community in order to vote. I would suggest instead using Boleyn Hall should it not still be used as a Covid testing facility.</p> <p>Regarding the other polling districts and places in Carterhatch ward the polling districts follow a logical geographical sense of the ward and the places are accommodating to the needs of voters in the ward, and I am therefore supportive.</p>	<p>The proposals set out in Appendix 1 recommend that the Temporary Unit on Hoe Lane Open Space is retained for electors north of Hoe Lane and those south of Hoe Lane who front on to it. The proposals recommend that the properties south of Hoe Lane vote at Boleyn Hall. Please see Appendix 1 for further details. A request for an extensive publicity campaign to inform electors in this area that their polling district has changed will be passed to the Electoral Services team.</p> <p>Positive feedback noted. No action was requested.</p>

Cockfosters

Reference Number	Respondent type	Representation	Proposal information
R6	Resident	I live on the Bolingbroke Park development. It would be much easier to have Freston Hall as our local polling station rather than 14th Southgate Scout Headquarters in Green Road which is much further away. Freston Hall in Freston Gardens is within a few minutes easy walk of the development. Not everyone has a car.	The proposals set out in Appendix 1 recommend moving electors on the Bolingbroke Park development to Freston Hall as this polling place is more conveniently located and at a shorter distance.

Edmonton Green

No representations received.

Enfield Lock

Reference Number	Respondent type	Representation	Proposal information
R7	Member of Parliament for Enfield North, Feryal Clark, MP	<p>There have been very minimal changes under the new proposals, with only one amendment suggested and very little negative feedback received from the 2021 elections.</p> <p>Having assessed each polling place individually I am in favour of the suggestions given the accessibility of the polling places that will allow disabled voters to vote with ease. In terms of the polling districts, they keep the community ties and logical geographical sense of the previous ward and I am therefore supportive.</p>	Positive feedback noted. No action was requested.

Grange Park

Reference Number	Respondent type	Representation	Proposal information
R8	Resident	I live at the northern end of Winchmore Hill. I've always found my allocated Polling Station at the Public Library at the bottom of the Ridge Avenue hill totally inconvenient, as I rarely travel in that direction and do not have access to a car. Consequently, I now vote by Post.	The LGBCE changes have reallocated properties at the northern end of Winchmore Hill to Grange Park ward. The proposals set out in Appendix 1 recommend electors in this area vote at Grange Park Methodist Church Hall.

Haselbury

Reference Number	Respondent type	Representation	Proposal information
R9	Edmonton Conservative Association	<p>There seems no real justification in maintaining Z-11-5 as a separate polling district. Electors could easily cross the road and vote at St Adhelm's Church Hall (number 45 on the map) so our suggestion is to merge polling districts Z-11-5 and Z-11-4. Although the new combined polling district would have 3,118 electors we note that there are already bigger polling districts in other wards eg Z-14-2. We have considered whether Klinger Hall (number 46 on the map) could be used instead but St Adhelm's Hall is better situated for the enlarged polling district, particularly those west of Windmill Road, and it is noted from the commentary attached to the map that Klinger Hall is not always available. Our suggestion therefore is to merge Z-11- 5 and Z-11-4 with St Adhelm's Church (number 45 on the map) as the polling station for the combined poling district.</p>	<p>The proposals set out in Appendix 1 recommend retaining Klinger Hall. To access St. Adhelm's Church Hall, electors who currently vote at Klinger Hall would be required to cross Silver Street which is a busy road. In addition, if the two polling districts were to be merged, two polling stations would be required at St. Adhelm's Church Hall as the electorate would be above 2,500.</p>

Highfield

No representations received.

Jubilee

Reference Number	Respondent type	Representation	Proposal information
R10	Edmonton Conservative Association	Polling District Z-13-2A has includes a section of Nightingale Road south of Cuckoo Hall Lane which seems completed disconnected from the remainder of the polling district. By including them in Z-13-2A electors at the south end of Nightingale Road have to travel all the way to St Alphege Church Hall (number 52 on the map) on the Hertford Road to vote. This seems a long distance. At first glance it would seem more sensible for electors on Nightingale Road to the south of Cuckoo Hall Lane to vote at Mottingham Hall (number 55 on the map). However, knowing the geography of the area, Houndsfield Primary School (number 54 on the map) is actually a better choice because its a more straightforward journey. Our suggestion is the stretch of Nightingale Road, South of Cuckoo Hall Lane, is added to Z-13-4A so electors can vote at Houndsfield Primary School (number 54 on the map).	The proposals set out in Appendix 1 recommend retaining the proposed boundary for Z-13-2A set out in the Acting Returning Officer's proposals. The proposals recommend electors on Nightingale Road south of Cuckoo Hall Lane continue to vote at St. Alphege Church Hall as this is a similar distance to Houndsfield Primary School.

Lower Edmonton

No representations received.

New Southgate

Reference Number	Respondent type	Representation	Proposal information
R11	Resident	I support the new proposed polling districts. I live in the current Bowes Ward. I am a short walk from the current polling station (Trinity at Bowes Church). With the new proposals. it is a much further to the polling station in the New Southgate Ward. Does not make much sense.	The Acting Returning Officer's proposals and the proposals set out in Appendix 1 recommend that properties located to the east of the railway line in New Southgate continue to vote at Trinity at Bowes Methodist Church Hall which is situated in Bowes ward.
R12	Resident	The Proposed Polling District Boundary for the New Southgate Ward seems to indicate that residents of Ollerton Road and possibly Stanley Road would not be able to use the Polling Place at the end of Highworth Road, which would be far more convenient to reach.	The proposals set out in Appendix 1 recommend reallocating electors on Ollerton Road, Stanley Road and the northern side of Eversham Road to Bowes Road Primary School as this polling place is more conveniently located than Bowes Road Library.
R13	Resident	Polling district and new ward seems fine to me. Bowes School is an excellent polling station, conveniently located. I hope I can continue voting there.	Positive feedback noted. No action was requested.

Oakwood

No representations received.

Palmers Green

No representations received.

Ponders End

Reference Number	Respondent type	Representation	Proposal information
R14	Edmonton Conservative Association	It is unclear why so many polling stations are needed in such a small area. Our suggestion would be to merge polling districts Z-18-3 and Z-18-5 and use The Royal British Legion as the polling station (number 70 on the map). There would then be no need for The Cube (number 71 on the map) act as a polling station.	The proposals attached at Appendix 1 recommend removing The Qube and reallocating the electors in Z-8-5 to Ponders End Library, The Royal British Legion or Ponders End Working Mens Club.
R15	Resident	2. The Library is no longer in that location	The plotted polling place indicates the location of the new Ponders End Library building which is under construction. Should an election take place prior to the opening of the new library, the temporary library building or The Qube could be considered.

Ridgeway

Reference Number	Respondent type	Representation	Proposal information
R16	Resident	Locally we have to poll in a pub. It would be preferable if this was in the car park	Investigations are ongoing into the instalment of a temporary unit polling station near the parade of shops, 4-14 Enfield Road or the green space on the junction of Bincote Road/Enfield Road which could replace The Jolly Farmers Public House.
R17	Member of Parliament for Enfield North, Feryal Clark MP	<p>There have been some changes to the polling districts in Ridgeway ward which are reflective of the new local government boundary wards with Y-19-2 being brought into the ward along with Y-19-8 and losing X-16-2 and X-7-5. However, as these are reflective of the new local government boundary wards, I am in favour of the polling districts also moving to ensure efficiency and keeping intact the local ties of the area.</p> <p>In terms of the polling places, I am also supportive as while I do take issue with the negative feedback that was reported at one polling place there is, as the proposals point out, no suitable alternative.</p>	Positive feedback noted. No action was requested.

Southbury

Reference Number	Respondent type	Representation	Proposal information
R18	Cllr Nesil Caliskan, Leader of the Council	<p>The southern polling district boundary for X-20-1B should be moved further south to include Lambourne Gardens.</p> <p>Polling station 82 (Fellowship Hut – Bush Hill Park Recreation Ground) is not a suitable venue as it is too small and poorly lit at nighttime. The suggestion is to merge X-20-3 and X-20-4 and use John Jackson Library as the polling place (83). This would remove the need for the Fellowship Hut.</p> <p>Having two polling stations (83 and 84) so close together is confusing to electors. The suggestion is to send electors in Z-20-5 to Aley Croft Community Hall (85) and remove Bush Hill Park United Reformed Church (84) as a polling place.</p>	<p>The proposals set out in Appendix 1 recommend moving the southern polling district boundary of X-20-1B (SBA2X) to include Lambourne Gardens.</p> <p>The proposals set out in Appendix 1 recommend removing Bush Hill Park Recreation Ground (Fellowship Hut) and reallocating the electors in this area to John Jackson Library. As John Jackson Library is unable to accommodate two polling stations, it is proposed that a new polling district is created for electors to the east of Bush Hill Park. The proposed polling place for the electors is Wheatsheaf Hall.</p> <p>The proposals recommend removing Bush Hill Park United Reformed Church and having two polling stations at Aley Croft Community Hall.</p>
R19	Member of Parliament for Enfield North, Feryal Clark MP	I am broadly supportive of the proposals. The new Southbury ward is due to pick up some polling districts in the previous Chase ward (to the north) and Bush Hill Park ward (to the south), bringing a polling district from Edmonton constituency into Enfield North. It also loses Lincoln Way to Ponders End ward. The streets and estates that have been reallocated to Enfield North keep intact the local ties of the area, along the new ward alignments, and I am therefore supportive.	Positive feedback noted. No action was requested.

		<p>However, I would suggest for the polling place for Z-20-5 to be moved. This is due to the fact residents in the south of the district have to travel a significant distance to the polling place. I would instead suggest for those voters in Z-20-5's polling place to be Aley Croft Community Hall. The Hall would be able to accommodate both voters in Z-20-5 and X-20-6, is more accessible than Bush Hill Park United Reform Church and has better transport links owing to being closer to Great Cambridge Road which will allow for easier and more efficient voting for those in Z-2-5. Monetarily, if Bush Hill Park United Reformed Church is not used then there will also be savings made.</p>	<p>The proposals recommend removing Bush Hill Park United Reformed Church and having two polling stations at Aley Croft Community Hall.</p>
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Southgate

No representations received.

Town

Reference Number	Respondent type	Representation	Proposal information
R20	Member of Parliament for Enfield North, Feryal Clark MP	I am supportive of the proposed polling places and districts bar X-22-2's polling place. St Andrew's C.E. School is currently used for X-22-2. While there has been no negative feedback on the polling place itself, I am concerned by it being in a school. I believe that the Civic Centre would be a better polling place given it is accessible, has the facilities to be a polling place and has good transport links. Though schools are used as the polling place for some of the other districts in Town ward there are no suitable alternative venues hence suggesting only this change to X-22-2.	Consideration was given to locating a polling place in Enfield Civic Centre. However, it was concluded that the Civic Centre was not suitable due to limited car parking and lack of suitably accessible rooms.

Upper Edmonton

No representations received.

Whitewebbs

Reference Number	Respondent type	Representation	Proposal information
R21	Member of Parliament for Enfield North, Feryal Clark MP	I am supportive of the proposals for Whitewebbs, they keep intact the community ties of the area and make logical sense. However, I would suggest for there to be a review of X-24-5 as there is currently 2,056 estimated in-person electors to one polling station at Lancaster Road URC Church Hall. One suggestion could be to change the polling district boundaries so to balance out the number of electors, with X-24-6 taking a few more streets and thereby balancing the number of electors. Another option would be to have another polling station in Lancaster Road URC Church Hall to ensure that there are enough facilities for voting on election day.	The proposals set out in Appendix 1 recommend removing St. Luke's Church and reallocating electors in this polling district to Brigadier Hall or Lancaster Road URC Church Hall. These proposals result in more even split of electors with an estimated 2,460 in-person electors allocated to Lancaster Road URC Church Hall and an estimated 2,185 electors allocated to Brigadier Hall.
R22	Representative of Third Sector organisation	I notice that Lancaster Road URC hall is the polling station for X-24-5. The Lancaster Centre, 53 Lancaster Road, EN2 0BU is a more central and visible venue for a polling station, additionally one of your polling station managers is already a key holder to the venue.	A viewing of The Lancaster Centre was conducted. The proposals set out in Appendix 1 recommend retaining Lancaster Road URC Church Hall as the polling place as the venue offers better parking facilities and more suitable accommodation for the number of in-person electors.
R23	Cllr Nesil Caliskan, Leader of the Council	<p>The suggestion is to send electors on Conway Gardens, Henry Close, Portland Drive, 6-54 Clay Hill and Burnham Close to Annexe Rear of Beacon of Light Church (103) as this polling place is easier for them to access.</p> <p>To reduce the number of polling places, the suggestion is to remove St Luke's Church (105) and for X-24-6 to be split at Merton Road with the</p>	<p>The proposals recommend moving these electors to Annexe Rear of Beacon of Light Church.</p> <p>The Acting Returning Officer's proposals recommended St. Luke's Church as an additional polling place following its use in the May 2021 elections due to Brigadier Hall being unavailable. The proposals set out in Appendix 1 recommend</p>

		southern properties going to 104 and the northern properties going to 106.	removing St. Luke's Church and reallocating electors in this polling district to Brigadier Hall or Lancaster Road URC Church Hall.
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Winchmore Hill

No representations received.

We received the following response from a resident. However, it is not clear from the response which ward/polling district or polling place is being referred to.

The new arrangements will mean a 10 minute walk rather than a 2 minute walk to my polling station, but I suppose I can live with that....

Additional responses that were outside/partially outside the scope of the consultation

Respondent type	Representation
Resident (R13)	I do hope that the Enfield Council website will make enable residents to type in their postcode to enable them to find out which ward they live in. At present, the website does not do this. You can find a councillor but it doesn't tell you which ward you live in.
Resident (R15)	1. Ponders End Ward reducing to 2 councillor's when the ward is so populated
Resident	I think the LTN system in place blocking roads has increased crime as the chief lady of police has said as well as health emergencies delayed. This labour council i will definitely not vote for as they do not listen and corruption is strife. They drive their 4 x 4 and ask us to cycle...!!! With heart problems...they have lost me totally now and i am not the only one. Labour will lose. Enfield council stinks! Get rid of them
Resident	All poling stations should be wheelchair accessible I personally vote by post which I find much easier but for other people with disabilities the poling station should be as accessible as possible
Resident	Making it easier for adults with lots of different disabilities to be able to vote in all elections going forwards
Resident	There are more wards proposed, but same number of councillors...there should be four councillors per ward to ensure equal opportunity and diversity .
Representative of Third Sector organisation	I am the vicar of St Aldhelm's Church and our hall is used as a polling station. At the moment, a temporary ramp is required to access the polling station but we are ready to install a permanent ramp to the hall - we are currently waiting for a response from Enfield's building control department before we go ahead, but hope the ramp will be available very soon.
Resident	POLLING Stations are a waste of space and time. Postal vote is much better, because, you can vote privately in your own home. Polling stations are a waste of time. People these days don't have time because they are busy, and sometimes people can't be bothered to wait in queues.
Resident	need to be more accesible for people with visual and hearing problems and for learning disabilities and difficulties such as Autism etc. and the main thing i would like to see change is font and the way things are written expecially for people with disabilities and dyslexia etc. need to be more accesible for people with learning, physical and phcological.
Resident (R8)	Couldn't care less. I never know who my counsellor is before or after an election.

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Enfield Equality Impact Assessment (EqIA)

Introduction

The purpose of an Equality Impact Assessment (EqIA) is to help Enfield Council make sure it does not discriminate against service users, residents and staff, and that we promote equality where possible. Completing the assessment is a way to make sure everyone involved in a decision or activity thinks carefully about the likely impact of their work and that we take appropriate action in response to this analysis.

The EqIA provides a way to systematically assess and record the likely equality impact of an activity, policy, strategy, budget change or any other decision.

The assessment helps us to focus on the impact on people who share one of the different nine protected characteristics as defined by the Equality Act 2010 as well as on people who are disadvantaged due to socio-economic factors. The assessment involves anticipating the consequences of the activity or decision on different groups of people and making sure that:

- unlawful discrimination is eliminated
- opportunities for advancing equal opportunities are maximised
- opportunities for fostering good relations are maximised.

The EqIA is carried out by completing this form. To complete it you will need to:

- use local or national research which relates to how the activity/ policy/ strategy/ budget change or decision being made may impact on different people in different ways based on their protected characteristic or socio-economic status;
- where possible, analyse any equality data we have on the people in Enfield who will be affected eg equality data on service users and/or equality data on the Enfield population;
- refer to the engagement and/ or consultation you have carried out with stakeholders, including the community and/or voluntary and community sector groups and consider what this engagement showed us about the likely impact of the activity/ policy/ strategy/ budget change or decision on different groups.

The results of the EqIA should be used to inform the proposal/ recommended decision and changes should be made to the proposal/ recommended decision as a result of the assessment where required. Any ongoing/ future mitigating actions required should be set out in the action plan at the end of the assessment.

The completed EqIA should be included as an appendix to relevant EMT/ Delegated Authority/ Cabinet/ Council reports regarding the service activity/ policy/ strategy/ budget change/ decision. Decision-makers should be confident that a robust EqIA has taken place, that any necessary mitigating action has been taken and that there are robust arrangements in place to ensure any necessary ongoing actions are delivered.

SECTION 1 – Equality Analysis Details

Title of service activity / policy/ strategy/ budget change/ decision that you are assessing	Polling District and Polling Place Review
Lead officer(s) name(s) and contact details	Jeremy Chambers, Director of Law and Governance Lee-Marie Grant, Head of Electoral Services Maggie Mulhall, AEA Consultant
Team/ Department	Electoral Services / Chief Executive's Department
Executive Director	Ian Davis
Cabinet Member	N/A
Date of EqIA completion	October 2021

SECTION 2 – Summary of Proposal

Please give a brief summary of the proposed service change / policy/ strategy/ budget change/project plan/ key decision

Please summarise briefly:

What is the proposed decision or change?

What are the reasons for the decision or change?

What outcomes are you hoping to achieve from this change?

Who will be impacted by the project or change - staff, service users, or the wider community?

The Local Government Boundary Commission for England Order for the London Borough of Enfield Electoral Review created new ward boundaries effective from May 2022. The arrangements will increase the number of wards from 21 to 25 with 13 three-member wards and 12 two-member wards.

A polling district and polling place review is required to reflect the new boundaries at the revision of the electoral register on 1 December 2021. The Polling District and Polling Place Review will subdivide the new ward areas, allocate a polling place, calculate the electorate for each polling venue and recommend the number of polling stations within the polling place. The Council has a statutory responsibility to review polling districts and polling places.

The purpose of such a review is to ensure that all electors have reasonably practicable facilities for voting and that polling places are reasonably accessible to electors who are disabled.

The review is an opportunity for electors, community groups and any other interested parties in Enfield to express their views on the polling district boundaries and polling places, and where possible make alternative suggestions for consideration. The consultation period ran between 5 August and 20 September 2021. Documents relating to the review were made available on the Council's website and at the Civic Centre. Representations could be submitted via the online questionnaire, or in writing via email or by post.

SECTION 3 – Equality Analysis

This section asks you to consider the potential differential impact of the proposed decision or change on different protected characteristics, and what mitigating actions should be taken to avoid or counteract any negative impact.

According to the Equality Act 2010, protected characteristics are aspects of a person's identity that make them who they are. The law defines 9 protected characteristics:

1. Age
2. Disability
3. Gender reassignment.
4. Marriage and civil partnership.
5. Pregnancy and maternity.
6. Race
7. Religion or belief.
8. Sex
9. Sexual orientation.

At Enfield Council, we also consider socio-economic status as an additional characteristic.

“Differential impact” means that people of a particular protected characteristic (eg people of a particular age, people with a disability, people of a particular gender, or people from a particular race and religion) will be significantly more affected by the change than other groups. Please consider both potential positive and negative impacts, and, where possible, provide evidence to explain why this group might be particularly affected. If there is no differential impact for that group, briefly explain why this is not applicable.

Please consider how the proposed change will affect staff, service users or members of the wider community who share one of the following protected characteristics.

Age

This can refer to people of a specific age e.g. 18-year olds, or age range e.g. 0-18 year olds.

Will the proposed change to service/policy/budget have a **differential impact [positive or negative]** on people of a specific age or age group (e.g. older or younger people)?

Please provide evidence to explain why this group may be particularly affected.

Enfield has more residents under 20 than the London and national averages.¹

Negative impact: The current (2021) polling scheme includes the use of 23 primary/junior schools and one nursery, of which 21 close to pupils on polling day, resulting in a loss of school days for young people of school age (4-18).

As of 2019, people aged 65 and over made up 14% of Enfield's resident population.² Older electors may have more difficulty accessing voting facilities.

Positive impact: As part of the polling district and polling place review, the following considerations were taken into account:

- Access for voters arriving at the polling station by car and by public transport
- The use of frequently used/well-known buildings such as community halls as polling places.

Electors are also made aware of the option of applying for a postal or proxy vote.

Mitigating actions to be taken

In order to reduce the number of schools used as polling places and the negative impact on children's education, alternatives to schools have been suggested wherever possible. Secondary schools are not used due to the possibility of snap elections being called during exam periods. The final proposals for polling places reduce the number of schools used as polling places by 5.

Many of the schools have inset days on polling days for scheduled elections and use the election as an opportunity to teach pupils about democracy and voting.

Due to the requirement to provide polling stations in a specified area (a polling district) and the requirement to make them accessible to all, it is often not possible to secure the use of an alternative facility.

Electors, community groups and any other interested parties within Enfield had the opportunity to provide feedback around specific polling places and suggest alternatives. All representations will be considered by the General Purposes Committee who will then put forward recommendations to the Council. No

¹ Enfield Council, [Borough Profile](#), 2020

² Enfield Council, [Equality and Diversity Annual Report](#), 2020

comments were received in the consultation in relation to schools or access to polling places for those over 65.

Disability

A person has a disability if they have a physical or mental impairment which has a substantial and long-term adverse effect on the person's ability to carry out normal day-day activities.

This could include:

Physical impairment, hearing impairment, visual impairment, learning difficulties, long-standing illness or health condition, mental illness, substance abuse or other impairments.

Will the proposed change to service/policy/budget have a **differential impact [positive or negative]** on people with disabilities?

Please provide evidence to explain why this group may be particularly affected.

It is estimated that around 52,382 (15.69%) of people in Enfield are affected by a long-term health problem (over 12 months) or disability which limits their day to day activity.³

Positive impact: Local authorities have a duty to review the accessibility of all polling places to disabled voters and ensure that every polling place, and prospective polling place, for which it is responsible is accessible to disabled voters 'so far as is reasonable and practicable'.⁴

As part of the preliminary review, the following information was reviewed to determine any access issues at previously used polling places:

- Presiding Officer and Polling Station Inspector feedback from the May 2021 Greater London Assembly (GLA) elections
- Surveys completed as part of the 2019 polling place review
- Polling station Covid-19 surveys and sketches completed prior to the GLA elections.

All proposed new polling places have been evaluated against the Electoral Commission checklist for polling places with a particular emphasis on the following requirements:

- Level access at entrance and within polling place (or space for temporary ramp)
- Wide enough doorways and corridors
- Sufficient space within the polling place to enable motorised wheelchair manoeuvrability.

Mitigating actions to be taken

In line with Electoral Commission guidance on conducting polling district and polling place reviews, groups and individuals within the Enfield area who have

³ Enfield Council, [Equality and Diversity Annual Report](#), 2020

⁴ [Representation of the People Act 1983](#), Section 18 (2)(a)

been identified as having expertise in access issues and the Council's staff Disability Working Group were invited to respond to the Acting Returning Officer's representation during the public consultation phase.

Respondents had the opportunity to provide further details around specific polling places and suggest alternatives. All representations will be considered by the General Purposes Committee who will then put forward recommendations to the Council.

In the consultation we received several general comments around making polling places more accessible to voters with disabilities. Although these comments were outside the scope of the consultation as they did not relate to specific polling places, they will be forwarded to the Electoral Services team.

Gender Reassignment

This refers to people who are proposing to undergo, are undergoing, or have undergone a process (or part of a process) to reassign their sex by changing physiological or other attributes of sex.

Will this change to service/policy/budget have a **differential impact [positive or negative]** on transgender people?

Please provide evidence to explain why this group may be particularly affected.

No impact anticipated.

Mitigating actions to be taken

No action required.

Marriage and Civil Partnership

Marriage and civil partnerships are different ways of legally recognising relationships. The formation of a civil partnership must remain secular, where-as a marriage can be conducted through either religious or civil ceremonies. In the U.K both marriages and civil partnerships can be same sex or mixed sex. Civil partners must be treated the same as married couples on a wide range of legal matters.

Will this change to service/policy/budget have a **differential impact [positive or negative]** on people in a marriage or civil partnership?

Please provide evidence to explain why this group may be particularly affected

No impact anticipated.

Mitigating actions to be taken

No action required.

Pregnancy and maternity

Pregnancy refers to the condition of being pregnant or expecting a baby. Maternity refers to the period after the birth and is linked to maternity leave in the employment context. In the non-work context, protection against maternity discrimination is for 26 weeks after giving birth, and this includes treating a woman unfavourably because she is breastfeeding.

Will this change to service/policy/budget have a **differential impact [positive or negative]** on pregnancy and maternity?

Please provide evidence to explain why this group may be particularly affected

Positive impact: The layout of polling stations is such that access for pushchairs is considered.

Mitigating actions to be taken

No action required.

Race

This refers to a group of people defined by their race, colour, and nationality (including citizenship), ethnic or national origins.

Will this change to service/policy/budget have a **differential impact [positive or negative]** on people of a certain race?

Please provide evidence to explain why this group may be particularly affected

The Labour Force Survey compiled by the ONS informs that in 2018 the percentage of adults in Enfield who spoke English at home was 76%, compared with 92% of the UK population.⁵

The most popular languages for which Enfield Council receives translation and interpreting requests are Turkish, Polish, Albanian, Somali, Bulgarian and Romanian.⁶

As at Spring 2020, the top five non-English languages spoken by Enfield school pupils were: Turkish (27.17%), Somali (8%), Polish (4.99%), Albanian/Shqip (4.8%) and Bengali (4.77%).⁷

Negative impact: Those whose first language is not English may find it more difficult to participate in the consultation and provide their views on the proposed polling districts and places.

Mitigating actions to be taken

⁵ ONS, [Labour Force Survey: First Language Spoken at Home](#), 2018

⁶ Enfield Council, [Borough Profile](#), 2020

⁷ Enfield Council, [Borough Profile](#), 2020

In order to ensure the consultation was accessible to those whose first language is not English, adverts were placed in the following foreign language newspapers: The Albanian, Parikiaki (Greek) and Avrupa (Turkish).

The Enfield Council website has a built-in translator tool which enabled visitors to translate the Polling District & Polling Place Review webpage and accompanying Frequently Asked Questions (FAQs).

The consultation was also forwarded to a wide range of community groups via the Community Sector Bulletin.

Religion and belief

Religion refers to a person's faith (e.g. Buddhism, Islam, Christianity, Judaism, Sikhism, Hinduism). Belief includes religious and philosophical beliefs including lack of belief (e.g. Atheism). Generally, a belief should affect your life choices or the way you live.

Will this change to service/policy/budget have a **differential impact [positive or negative]** on people who follow a religion or belief, including lack of belief?

Please provide evidence to explain why this group may be particularly affected.

According to the 2018 ONS Annual Population Survey by religion, Christianity (all denominations) is the most common religion in the borough with 55.2% of residents. 14.7% of residents are of the Muslim faith, 4.0% are Hindu, 0.7% are Buddhists, 0.6% are Jewish and 2.6% are of any other religion. 22.1% of the population hold no religion or belief.⁸

Negative impact: The use of religious or consecrated buildings may discourage other faith groups from voting. In the proposed polling district and polling place scheme 32 out of 108 polling places belong to a particular faith group. In 5 of these buildings, voting takes place in the main church.

Mitigating actions to be taken

Due to the requirement to provide polling stations in a specified area (a polling district) and the requirement to make them accessible to all, it is often not possible to secure the use of a more generic facility.

Where the main church is used as the polling station, this is clearly stated on the poll card. Electors are also made aware of the option of applying for a postal or proxy vote.

⁸ ONS, [Annual Population Survey: Population by religion](#), 2018

The consultation was forwarded to members of the Enfield Faith Forum to secure their views on the proposed polling districts and places. No responses were received in relation to the use of religious buildings as polling places.

Sex

Sex refers to whether you are a man or woman.

Will this change to service/policy/budget have a **differential impact [positive or negative]** on men or women?

Please provide evidence to explain why this group may be particularly affected.

No impact anticipated.

Mitigating actions to be taken

No action required.

Sexual Orientation

This refers to whether a person is sexually attracted to people of the same sex or a different sex to themselves. Please consider the impact on people who identify as heterosexual, bisexual, gay, lesbian, non-binary or asexual.

Will this change to service/policy/budget have a **differential impact [positive or negative]** on people with a particular sexual orientation?

Please provide evidence to explain why this group may be particularly affected.

No impact anticipated.

Mitigating actions to be taken

No action required.

Socio-economic deprivation

This refers to people who are disadvantaged due to socio-economic factors e.g. unemployment, low income, low academic qualifications or living in a deprived area, social housing or unstable housing.

Will this change to service/policy/budget have a **differential impact [positive or negative]** on people who are socio-economically disadvantaged?

Please provide evidence to explain why this group may be particularly affected.

Car ownership in England depends heavily on household income. According to the Department for Transport's 2019 National Travel Survey, 45% of households in the lowest real income level quintile do not own a car or van compared with 14% of households in the highest real income level quintile.⁹

According to research undertaken by Transport for London, the most commonly used form of transport for Londoners with lower household incomes (below £20,000) is walking.¹⁰ The bus is the next most commonly used form of transport with 69% of people with lower household incomes taking the bus at least once a week compared to 59% of all Londoners. In addition, 42% of Londoners with a household income of less than £20,000 have household access to a car compared with 65% of Londoners overall, declining to 27% of Londoners in the lowest household income bracket (less than £5,000).

It can therefore be assumed that households in areas with higher levels of socio-economic deprivation/with lower levels of household income will have a greater reliance on walking and/or public transport to access the polling place. 15.6% of households in Enfield have an annual gross income under £15,000 and 42.6% of Enfield households earn less than £30,000 per annum, both higher than the London average.¹¹

Positive impact: As part of the preliminary review, the following information was reviewed:

- Public transport accessibility data and public transport routes
- Distances electors within the polling district are required to travel to access the polling place.

Mitigating actions to be taken.

Electors, community groups and any other interested parties within Enfield had the opportunity to provide feedback around specific polling places and suggest alternatives. All representations will be considered by the General Purposes Committee who will then put forward recommendations to Council.

One response was received in the consultation relating to the distance electors in a polling district had to travel to a polling place. The resident commented that

⁹ Department for Transport, [National Travel Survey](#), 2019

¹⁰ Transport for London, [Travel in London: Understanding our diverse communities](#), 2019

¹¹ Enfield Council, [Borough Profile](#), 2020

the distance made it difficult for those without a car to access the polling place. The response will be considered by the General Purposes Committee who will put forward their final recommendations to Council.

SECTION 4 – Monitoring and Review

How do you intend to monitor and review the effects of this proposal?

Who will be responsible for assessing the effects of this proposal?

The Electoral Registration and Administration Act 2013 amended the Representation of the People Act 1983 to require the Council to undertake full reviews of polling districts and polling places at least every five years within a specific timeframe. In addition, the Council reviews the polling places following an election to ensure ongoing suitability of location and accessibility of the premises.

The responsibility to provide recommendations to Council on electoral arrangements in the borough relating to the designation of polling districts and polling places lies with the General Purposes Committee.

SECTION 5 – Action Plan for Mitigating Actions.

Identified Issue	Action Required	Lead officer	Timescale/By When	Costs	Review Date/Comments

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London Borough of Enfield**Council Report****Meeting Date – 17th November 2021**

Subject: Safeguarding Enfield Annual Report 2020/21**Cabinet Member: Cllr Alev Cazimoglu / Cllr Uddin****Executive Director: Tony Theodoulou****Key Decision:**

1. Purpose of Report

1.1. The report is being presented for Council to note the Safeguarding Partnership's activity to protect adults and children in 2020-21.

1.2. It highlights the positive actions taken to prevent neglect, abuse and exploitation against adults at risks, children and families, includes data to demonstrate the impact of these actions, and states the priorities of the partnership for the 2021-22 period.

1.3. The report also provides Safeguarding updates on responses by agencies during 2020/21 relating to the pandemic.

2. Proposal(s)

2.1. The Safeguarding Enfield Annual Report 2020-21 is being presented to Council to note, in order to draw attention to the key safeguarding risks facing vulnerable residents and to raise the profile of the initiatives being carried out to prevent and tackle these issues.

2.2. Council should note the successes and challenges that have arisen from safeguarding activity in the period 2020-21.

2.3. Council is asked to note that the draft report was considered at the Health and Adult Social Care Scrutiny Panel and comments made have resulted in amendments to the final report. The report has also been presented to the Children, Young People's and Education Scrutiny Panel.

3. Reason for Proposal(s)

3.1 Noting the Annual Report at Cabinet and Council enables Enfield Council to demonstrate its commitment to safeguarding adults at risk, children and young people throughout the organisation.

4. Relevance to the Council Plan

4.1

Safe, healthy and Confident communities

The work of the Safeguarding Enfield Partnership meets the Council's priority of "Safe, healthy and confident communities".

The purpose of safeguarding work is to protect children, young people, adults at risk, and their carers and families so that they can all thrive in the borough. The Partnership's approach to safeguarding focusses on well-trained staff who can effectively engage and manage the risks that may be present.

For Children, there is an emphasis on improving services for those children, young people and families that require prevention and intervention from safeguarding services across a broad spectrum, from early help to statutory interventions.

For Adults, as part of the 'Prevent Abuse' priority, the Partnership will be developing our IT/ Social Media offering alongside a community engagement programme, via the Community Awareness Raising group. The aim of both these areas of work is to improve the awareness of abuse, understand how to report it, and also to reduce isolation, an issue which is known to increase levels of vulnerability. There is also ongoing work with local adult social care providers, which will ensure we support local providers to maintain the standards and minimise the risk of services becoming unsafe.

5. Background

5.1. There are statutory duties for publishing an annual Safeguarding Adults Report and a Safeguarding Children Partnership report. These duties apply to the Safeguarding Adults Board and the Safeguarding Children's Partnership respectively. The duties require specific information to be provided. The specific actions taken to address the requirements are in italics.

5.2 For the Safeguarding Adults Board, the Care Act requires that the report include:

- what it has done during that year to achieve its objectives and strategy; *(the information of the report is organised by the priority areas of the strategy)*
- what each member has done during that year to implement the strategy *(this is done through the partner statement in the appendix)*

- information on Safeguarding Adults Reviews, including information on referrals received, on-going reviews and key learnings from reviews that have been published.
(this is detailed in the learning from experience section)

5.3 For Safeguarding Children, Working Together requires that the report include:

- what the Safeguarding Partnership have done as a result of the arrangements, including on child safeguarding practice reviews, and how effective these arrangements have been in practice *(the arrangements are highlighted in report, as are the safeguarding practice reviews)*.

5.4 In addition, the report should also include:

- ways in which the partners have sought and utilised feedback from children and families to inform their work and influence service provision *(for example Safeguarding Ambassador feedback on new website)*.
- Safeguarding partners should make sure that the report is widely available, and the published safeguarding arrangements should set out where the reports will be published.
(Report will be published on website, promoted through newsletter and shared on twitter).
- A copy of all published reports should be sent to the Child Safeguarding Practice Review Panel and the What Works Centre for Children's Social Care within seven days of being published.
- The three safeguarding partners should report any updates to the published arrangements in their yearly report and the proposed timescale for implementation *(section on Children's safeguarding arrangements will cover this when necessary)*.

5.5 Scrutiny Panel presentations of the Annual Report

The Safeguarding Enfield Annual Report 2020/21 was presented to the Health and Adult Social Care scrutiny panel on the 28th July whilst in its consultation stage, and was well received. Feedback from the panel was integrated into the report.

The report has been presented to the Children, Young People and Education Scrutiny Panel on 20th October 2021.

6. Main Considerations for the Council

Safeguarding Enfield Annual Report 2020/21

6.1 Across the Partnership, our primary responsibility is to provide a way for the local agencies to work together to safeguard those at risk, and to ensure that the arrangements in place are working effectively.

6.2 2020-21 has been a busy year for the Safeguarding Enfield Partnerships and all of our partners. The impact of COVID has had a profound effect on many of our agencies, both in terms of pressures and also in terms of having to adapt to new ways of working. Despite the numerous changes and challenges, agencies across the partnership have continued to demonstrate strong commitment to the work of safeguarding Enfield residents.

6.3 The Safeguarding Enfield Partnership remains committed to a programme of scrutiny, monitoring and, assuring the quality of safeguarding activity across Enfield. This programme of robust analysis and challenge will continue to ensure that children, young people and adults at risk of abuse or harm are identified and responded to speedily and effectively.

6.4 The Safeguarding Enfield partnerships have a priority on learning from experience. To facilitate this, we draw on learning from a number of different review processes (including, Safeguarding Adults Reviews, children's safeguarding Rapid Reviews and Local Child Safeguarding Practice Reviews). The reviews from 2021/22 will be reported in next year's annual report, this will include learning from the review on forced marriage. As part our reviews process, we take immediate steps to address learning from the case, including commissioning training and updating working practices.

6.5 The summary of the key issues or achievements of the year highlight:

Covid-19 response

Safeguarding response during COVID-19 across the Partnership, including:

- Regular contact with care homes,
- welfare calls by our quality checkers
- analysis of concerns during lockdown, we received 3,278 safeguarding adult concerns
- Extra-ordinary Safeguarding Adults Board meeting held.

Domestic Abuse

The Domestic Abuse Hub was launched in May 2020. Over 214 calls have been received. 85 calls have been from victims.

Serious Youth Violence

We held a Partnership event in February 2021 to consult on the Public Health approach to Serious Youth Violence. Attended by over 100 delegates, including our Safeguarding Partners and schools.

Modern Slavery

127 referrals received to the Modern Slavery team; 60 awareness raising sessions to 715 delegates. Modern Slavery hotline launched.

LeDeR reviews

28 notifications received for people with learning disabilities. this is double the pre-pandemic 4-year average. 19 deaths involved COVID

Child Death

Between April 2020 and March 2021, Enfield had 21 notifications of child deaths, similar to the previous year (death of a person under 18 years of age). Of the 21 deaths, 13 were male, 8 were female.

6.6 Other areas of note, include:

- New Safeguarding Enfield website launched
- Training included: Substance misuse and hidden harm, PREVENT and modern slavery.
- Learning from Safeguarding Adults Review learning themes developed through action plan analysis.

6.7 Important areas of work for 2021-22

- Detailed data analysis work in Enfield and regionally to better understand the impact of COVID and trends around abuse for adults and children. This is being led by our Insights Activity group.
- Introduction of network of safeguarding champions through the Community Awareness Raising group.
- Multi-agency Safeguarding Children audits on professional curiosity and information sharing; children affected by domestic abuse; and serious youth violence.
- SMART Living pilot project extended to include 250 devices (Amazon Echo Shows) to connect service users with their family and friends.
- Implementing recommendations and learning from reviews in 2021/22.

7. Safeguarding Implications

7.1 The report highlights the work of the Safeguarding partnership to safeguard adults at risk, children and families in Enfield. The safeguarding implications of this work are:

7.2 For Enfield Council – as lead agency for adults and with joint responsibility with Police and the Clinical Commissioning Group for Childrens safeguarding, it is important that we highlight how we work together with our community and partners, and detail what we are learning and how we improve current provision.

7.3 For the community - improvements in understanding how to stay safe, how to recognise abuse and how to report it.

7.4 For our partners – good communications so that any issues with joint work (which is essential to effective safeguarding) can be escalated, managed and improved.

8. Public Health Implications

8.1 Important public health aims include enabling young people to 'start life well' and for older people to 'live and age well'. Ensuring that the most vulnerable are safe and enabled to thrive is therefore very relevant.

8.2 The Safeguarding Enfield Partnership has strong links with the Health and Wellbeing Board. Public health officers are also members of the Safeguarding Adults Board and Children's Activity Groups, to enable joined-up work with a focus on prevention.

8.3 The priorities identified in this strategy will support work with local people and partners to promote approaches that improve the quality of life for vulnerable children, young people, adults and families.

9. Equalities Impact of the Proposal

9.1 An Equality Impact Assessment has been carried out for the Safeguarding Adults Strategy 2018-23. This report provides progress against the Adults strategy.

9.2 It should be noted that partners that we engage with are required to assist us in meeting our obligations under the Equalities Act 2010.

10. Environmental and Climate Change Considerations

There are no environmental implications. However, the COVID-19 lockdown and the improved use of technology has enabled us to become paperless; and removed the need for travel.

11. Risks that may arise if the proposed decision and related work is not taken

Publishing this report is part of our statutory duties, and not doing so would mean we would be in breach of these.

12. Risks that may arise if the proposed decision is taken and actions that will be taken to manage these risks

Noting the Annual Report helps Enfield Council to demonstrate its commitment to safeguarding. It will also mitigate reputational risk, demonstrating openness and transparency about how the Safeguarding Enfield Partnership will address issues of abuse and exploitation in Enfield.

13. Financial Implications

There will be no additional finance costs as a result of this annual report.

14. Legal Implications

14.1 **Children:** Section 16E of the Children Act 2004 requires safeguarding partners (which include the local authority) to set up safeguarding partnerships to work together to exercise their functions, so far as these are exercised for the purpose of safeguarding and promoting the wellbeing of children in their area.

14.2 Section 16G of the Children Act 2004 requires the safeguarding partners to prepare and publish a report at least once in every 12 month period on what the safeguarding partners have done as a result of the safeguarding partnership arrangements, and how effective the arrangements have been.

14.3 Guidance on children's safeguarding partnerships is set out in Working Together to Safeguard Children (July 2018) and explains the detail that should go into the annual report.

14.4 The matters set out in this report comply with the above statute and guidance.

14.5 **Adults:** Section 43 (1) Care Act 2014 ("the Care Act") requires each local authority to establish a Safeguarding Adults Board ("SAB") for its area. The statutory objective of an SAB is to safeguard and protect vulnerable adults in its area. A SAB may do anything which appears to it to be necessary or desirable for the purpose of achieving its objective.

14.6 Paragraph 4 of Schedule 2 of the Care Act requires a SAB to publish an annual report as soon as feasible after the end of each financial year about what it has done during that year to achieve its objectives, implement its strategy, the findings of safeguarding adults' reviews which have been concluded and which are ongoing. In addition, to publish what it has done to implement the findings of reviews and where it is decided not to publish the findings of a review, the reasons for that decision.

14.7 The recommendations set out in this report comply with the above legislation and guidance.

Implications provided by I Deuchars on 26/7.

15. Workforce Implications

15.1 The report refers to work carried out in response to Covid-19 pandemic. The Council is committed to protecting the health, safety and welfare of its' workforce. The following measures have been put in place to support staff during the COVID pandemic to enable the continuing provision of services to the residents of Enfield;

- Assessment of work activities and the environment and taking measures to reduce the risks as far as practicable.
- Deployment of staff to alternative roles to support vulnerable residents.
- Providing Coronavirus FAQ updates for staff with input from Human Resources, the Public Health Team and other teams across the Council, including links to Government, Public Health England and NHS guidance and information.

- Enabling remote working.
- Supporting staff's mental health and wellbeing by signposting to support such as the EAP Helpline.
- Providing continued access to learning and development opportunities by promoting remote learning and providing virtual learning and development events and workshops.

16. Property Implications

None

17. Other Implications

None

18. Options Considered

18.1 Producing two annual reports (including these priorities), one for the Safeguarding Adults Board and another for the Safeguarding Children Partnership, was considered.

18.2 Feedback from residents is that they are more likely to engage with one report and one conversation about abuse and risk, rather than two.

19. Conclusions

Please note the report.

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Tel No.]

Date of report: 4th November 2021

Appendices

Background Papers

The following documents have been relied on in the preparation of this report:

The Safeguarding Enfield Annual Report for 2020/21 (unformatted).

Enfield Safeguarding Adults Board and Safeguarding Children Partnership

Safeguarding Enfield

Annual Report

2020-21



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www.enfield.gov.uk/safeguardingenfield





Safeguarding ENFIELD

Here are some of the organisations working to keep children, young people and adults at risk safe in Enfield.



We all have a role to play to help keep children, young people and adults who may be at risk, safe.
If you have concerns, please contact us and we can act to stop abuse.

Please talk to us

Safeguarding children, young people and adults at risk is everyone's responsibility. As someone who might live, work or study in Enfield you have a role too. If you are worried about someone or yourself, **please talk to us**. You can get help in any of these ways.

Children and young people

If you or the person you are concerned about is under 18 (a child or young person):

- Ring the Children Multi-Agency Safeguarding Hub (MASH) Team on **020 8379 5555**, Monday to Friday 9am-5pm.
- Call the emergency duty team on **020 8379 1000** at night and weekends, and tell them what is happening.
- For people who work with children and young people, please make your referral using the Children Portal:
www.enfield.gov.uk/childrensportal
- You can email at:
ChildrensMash@enfield.gov.uk
- In an emergency – such as when someone is being hurt or shut out of their home – ring the police on **999**. You can also ring **ChildLine** on **0800 1111** or visit the ChildLine website:
www.childline.org.uk

If you don't want to talk to someone you don't know, you can ask an adult that you trust, like a teacher or youth worker or even a friend, to make the phone call for you. When people are working with children they have to follow set procedures, but they will explain to you what they will do and should be able to support you through the process.

ChildLine

ChildLine have launched the **'For Me'** app – the first app to provide counselling for young people via smartphone and other mobile devices. For more information and to download the app for free, go to:
www.childline.org.uk/toolbox/for-me



Adults

If you or the person you are concerned about is over 18 (an adult at risk) you can call anonymously on the Adult Abuse Line: **020 8379 5212** (Textphone: **18001 020 8379 5212**). In an emergency always call **999**.

There is also helpful information on the Safeguarding Enfield website. Go to:
www.enfield.gov.uk/safeguardingenfield

For all Enfield residents

Domestic Abuse Freephone helpline

If you have experienced or are currently experiencing being made to feel unsafe by someone close to you, this is domestic abuse. Domestic abuse is not okay and is a crime. There is a specialist team to ensure no one is turned away and support is there for anyone in need. Call us on **0800 923 9009**, Monday to Friday 9am-5pm. Email us at:
callusDAH@enfield.gov.uk.

We are here to help you.

Modern Slavery Helpline

Modern Slavery is a crime that is hidden from plain sight but, occurs everywhere around us. Modern slavery is happening right here in Enfield and it needs to be stopped. An advice line is available to provide information and support for those that have any concerns or general questions regarding modern slavery. If you would like to discuss your concerns please contact us on **020 3821 1763**, Monday to Friday 10am-2pm, or you can email us at:
ModernSlavery@enfield.gov.uk

Our vision:

“is for a community where we can all live free from abuse and harm; a place that does not tolerate abuse; where we all work together to stop abuse happening at all, and where we all know what to do if it does take place.”

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Foreword from the Chair

As the Independent Chair of the Safeguarding Adults Board (SAB) and the Scrutineer of the Safeguarding Children's Partnership (SCP) I am pleased to introduce the 2020-21 Annual Report outlining the partnership activities which contribute to keeping Enfield's communities safe.

Safeguarding is 'everyone's business' and if you are worried about a child, family, young person or adult at risk, please speak up using the contact information in this report. We can help.

The last 12 months have presented considerable challenges, with several months spent in COVID related lockdowns. We have all had to adjust: by adopting new ways of working, complying with additional government guidance, and changing how we stay in touch with family and friends. All health providers, the local authority and the local police service, as well as several other contributing partners have needed to operate in a very unusual and hitherto unknown set of circumstances. 'Business as usual' took on a new meaning when so much was disrupted.

In this report, we present the work agencies have delivered to enable the safeguarding functions to operate as smoothly as possible. (This can be found in detail in Appendix D). This year's activities have been inextricably linked

with the local and national COVID response. The report begins with the Board's primary focus on Protecting People from Abuse, followed by a range of activities carried out to Prevent Abuse.

In addition, we also highlight some inspiring examples of the work done. These accounts illustrate the breadth of the work that has taken place across Enfield. A huge thank you to all concerned.

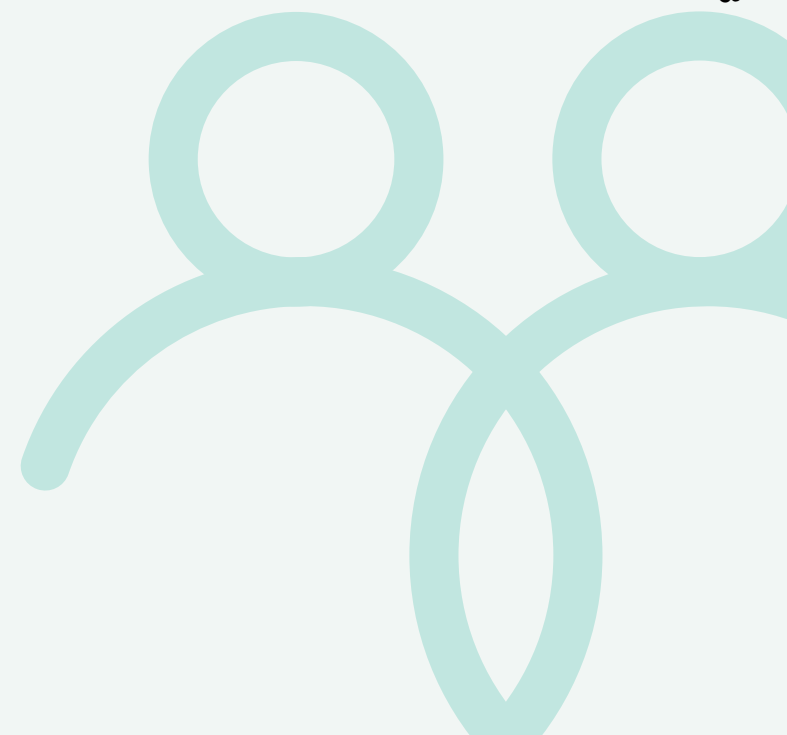
I hope you find this report informative and I want to encourage all of you readers to let us have your thoughts. Tell us what you think, what are we doing well, what do we need to improve on, how else can we communicate better across all the different communities of Enfield.

Take a look at our twitter feed [@enfieldsafeguarding](#) and our website: www.enfield.gov.uk/safeguardingenfield

Please email us at: SafeguardingEnfield@enfield.gov.uk



Geraldine Gavin
Independent Chair of the
Safeguarding Adults Board, and
Scrutineer of the Safeguarding
Children Arrangements



Introduction

This report presents the work that the Enfield Safeguarding Adults Board, the Safeguarding Children's Partnership, and the organisations that are part of them have done to keep children, young people and adults at risk of abuse, safe.

The report covers the period 1st April 2020 to 31st March 2021. The style and presentation of this report has been developed by Enfield Safeguarding Adults Board's Service User, Carer and Patient group.

Care Act 2014 (Adults)

The Care Act requires the Board to report on its activities in the past financial year, and its plans for the coming year to keep people who may be at risk of abuse or harm, safe.

Working Together 2018 (Children)

The statutory guidance says we must publish a report at least once in every 12-month period. It must set out what we have done as a result of the arrangements, including on child safeguarding practice reviews. The report should also include evidence of the impact of the work of the safeguarding partners and relevant agencies.



Safeguarding in Enfield

Safeguarding is the work done to protect children, young people and adults who are, or may be, at risk of abuse or harm.

Safeguarding is everyone's business. This means you, your friends and families, your neighbours, as well as the people who work for organisations like Enfield Council, the Police, the NHS and others, have important roles to play to help keep people safe in our community.

Safeguarding work in Enfield is brought together in two ways:

1. the Safeguarding Adults Board, and
2. the Safeguarding Children's Partnership.

These arrangements bring together organisations that work in Enfield to make sure there are good ways of working to keep safe children, young people and adults at risk.

The Safeguarding Adults Strategy 2018-23 outlines our work and priorities for Adults at risk; and the Safeguarding Children Arrangement document (2019) details how partnership work for Safeguarding Children is organised. Many of the Activity Groups work for both Children's and Adults Safeguarding. Both of these documents can be found at: www.enfield.gov.uk/SafeguardingEnfield

The work of the Safeguarding Partnership is organised into one of four areas: Prevent abuse, Protect those at risk, Learn from Experience, and Improve Services.

Care Act 2014 (Adults)

The Enfield Safeguarding Adults Board is a statutory board formed under the Care Act 2014. The Local authority, the Police and the NHS are statutory members of the Board.

Working Together 2018 (Children)

The Statutory Safeguarding Partners are the Local Authority, the Police, and the Clinical Commissioning Group.

Enfield's arrangements were agreed and signed by the Safeguarding Partners on 5th June 2019. The arrangements were in place on the 29th September and the Department of Education were notified.

Children Act 2004 and the Children and Social Work Act 2017 (Children)

The Children's Act 2004 and the Children and Social Work Act 2017, state the statutory duties for local authorities and safeguarding partners to work together to safeguard and promote the welfare of children.



Summary of what we did in 2020-21

2020-21 has been a busy year for the Safeguarding Enfield Partnerships and all of our partners. The impact of COVID has had a profound effect on many of our agencies, both in terms of pressures and also in terms of having to adapt to new ways of working. Despite the numerous changes and challenges, agencies across the partnership have continued to demonstrate strong commitment to the work of safeguarding Enfield residents.

The Safeguarding Enfield Partnership remains committed to a programme of scrutiny, monitoring and, assuring the quality of safeguarding activity across Enfield. This programme of robust analysis and challenge will continue to ensure that children, young people and adults at risk of abuse or harm are identified and responded to speedily and effectively.

This section presents a summary of the main pieces of work that the Enfield Safeguarding Partnership completed or oversaw in 2020-21.

For more information about the areas highlighted in this summary, please click on the relevant heading.

Covid-19 response (PROTECT)

Across the Partnership all of our agencies have been affected by the pandemic. As part of our Partner updates for this report we have asked partners to provide information about their response to the pandemic. Please see Appendix D.



+3,278 highest ever number of concerns received by Adults Multi-Agency Safeguarding Hub (MASH).

Domestic Abuse (PROTECT)

The Domestic Abuse Hub was launched in May 2020. Over 214 calls have been received. 85 calls have been from victims.



Modern Slavery (PROTECT)

127 referrals received to the Modern Slavery team; 60 awareness raising sessions to 715 delegates. Modern Slavery hotline launched.



LeDeR reviews (LEARN)

28 notifications received for people with learning disabilities. This is double the pre-pandemic 4-year average. 19 deaths involved COVID.



Serious Youth Violence (PREVENT)

We held a Partnership event in February 2021 to consult on the Public Health approach to Serious Youth Violence. Attended by over 100 delegates, include our Safeguarding Partners and schools.



Child Death (LEARN)

Between April 2020 and March 2021 Enfield had 21 notifications of child deaths, similar to the previous year (death of a person under 18 years of age). Of the 21 deaths, 13 were male, 8 were female.



Work in schools (IMPROVE)

Education department provided weekly home learning ideas for over 400 Private, Voluntary or Independents (PVI)s, schools and childminders. A new Designated Safeguarding Leads (DSL) network for school DSLs has been set up.



SMART Living (PREVENT)

Following a successful pilot project, over 250 SMART Living devices were secured. These devices enable better communication and assist adult social care users.



Protect people at risk

One of the main tasks for the Safeguarding Partnership is to make sure we have excellent responses to concerns. We do this through having clear policies, good training, looking at our data and audits (checks). This year a significant part of this work involved responding to emerging risks due to COVID-19. Here we present some of our key responses, policies, talk about our training and present some high-level data. More details information can be found in the appendices.

ADULTS

Covid-19 response

Across the Partnership, all of our agencies have been affected by the pandemic. As part of our Partner updates for this report we have asked partners to provide information about their response to the pandemic.

This has included:

- Managing increased number of concerns (3,278), including higher proportions of domestic abuse and neglect related cases being reported into the Adults Multi-Agency Safeguarding Hub (MASH).

- Ensuring practices around hospital admissions and reporting safeguarding concern were appropriate.
- Daily calls to care homes.
- Thousands of welfare calls, including over 2,500 to our Learning Disabilities clients.

To read more, see Appendix A for more detailed information Safeguarding Adults data, and Appendix D for partner updates.

Safeguarding Adults Board activities

The Safeguarding Adults Board (SAB) provided assurance across a number of areas: Do Not Attempt Resuscitation orders, appropriate hospital admission in line with government guidance, work around homelessness, modern slavery and on the patterns and trends of concerns being reported. The SAB also ensured the national insights work into concerns were taken into account when considering local trends.

In 2021/22, practices around community Do Not Attempt CPR orders are being assured by a joint project between the NHS Clinical Commissioning Group and Adult Social Care, funded by the NHS Clinical Commissioning Group. GP practices are being asked to confirm their practices following concerns raised in the media and by a lay member.

Adult Multi-Agency Safeguarding Hub (MASH)

Care Act 2014 (Adults)

Safeguarding Adults duties are detailed in Section 42 of the Care Act and in the accompanying Statutory guidance.

Where the following criteria are met for a concern the Local Authority, who is named as the lead agency for safeguarding, must ensure that a Safeguarding Enquiry takes place. The criteria that a concern must meet to require an enquiry are that: it is about a person who is over 18 years of age, with care and support needs, and who is experiencing, or is at risk of, abuse or neglect, and is unable to protect themselves.

	2017/18	2018/19	2019/20	2020/21
Concerns received by the Adults MASH	1,616	2,307	2,326	3,278
Concerns that led to enquiries	741	656	356*	1,217

*Only includes Statutory Section 42 (2)

Since the conception of the Adult MASH, there has been a commitment that all concerns will be responded to. This can include information and advice, sign-posting to other services, assessments for care and support services, or for a social worker to work with the adult to manage the risks of abuse they face.

2020/21 saw a significant increase in safeguarding concerns. Concerns relating to self-neglect, and those occurring in people's own homes were highest. This included an increase in the proportion of domestic abuse concerns.

Enfield are part of a National Insights projects, led by the Association of Directors of Adults Social Services, to understand safeguarding concern trends since the pandemic began. Initial analysis shows that the types and numbers of concerns received in Enfield are in line with what has been experienced nationally.

Adult Multi-Agency Safeguarding Hub (MASH) Nurse

The Safeguarding Adults team have continued to maintain strong partnership working with the NCL Clinical Commissioning Group, Enfield Directorate, in the reporting period of 2020-21 with the Local Authority in the following areas:

MASH (Adults) has been fortunate to have the support of a qualified Nurse subject to funding by the Clinical Commissioning Group. The role of the MASH Nurse Assessor has been invaluable within the MASH team when working in a multi-agency context, working with: Nursing Homes, Hospitals, General Practitioners and District Nurses. A clinical perspective in scoping the points to consider when requesting an enquiry enables more focused reports which allows for better learning and therefore preventative work. This has prevented delays and duplications which can occur when social care staff assess and decide on the lines of enquiry around clinical issues.

Supporting Care providers

Our work with care providers was organised to ensure they had: access to information and support around infection control; the latest public health guidance; and could raise issues with our quality assurance team.

Ongoing support to providers

Targeted support was provided to care support workers and informal carers to embed infection control training and translate this into good working practices, for example in how to use PPE correctly and effectively to protect all those they have direct contact with. The quality

assurance team were the point of contact for care providers, and concerns and issues raised from them were considered and responded to with the Public Health team.

Communications

We were in regular, at times daily, contact with our care providers, and have developed a dedicated MyLife webpage. The webpage, which was developed in partnership with Public Health, focuses on infection control information and training.

Quality Assurance and emergency processes

Many social care providers sadly suffered significant losses of residents due to the covid virus. This meant that the pandemic reduced the demand for residential and nursing placements. This information was monitored to ensure we understood any risks around potential provider failures.

The quality checkers gathered information directly from people who use services and their friends and family to ensure their experiences during the 'lock down' period was included in our considerations and learning.

Protect people at risk

Learning

The strategic safeguarding adults team undertook learning reviews with providers that had COVID outbreaks to identify risks and develop risk mitigation strategies.

Working with people who have refused to comply with government guidance

Regular meetings took place, chaired jointly with Public Health to consider residents, and council tenants, who were not complying with COVID-19 guidance on social isolation and distancing. The meetings were multi-agency and provided a place where agencies could refer in, with a risk assessment, and appropriate local action could be taken. If the local measures were not successful, the group could refer to Public Health England.

Modern Slavery

Enfield is one of the first areas in London to have a dedicated Modern Slavery Team comprising Local Authority and Police staff. The multi-agency team has been raising awareness and responding to intelligence.

The team continued to operate over the lockdown in 2020/21, with 127 referrals being made to the team between 20th January

2020 to 31st March 2021. The team provided enough evidence to enable the Crown Prosecution Service to charge four people with modern slavery offences, relating to a case we received in the team in 2020. The trial is due to commence in Autumn 2021.

The team continue to stay busy with training and awareness raising – a crucial part of the strategy – having delivered 60 awareness training sessions to 715 delegates to a variety of teams across Enfield partnership.

In July 2020 the team worked on a large-scale operation involving over 100 Police officers and partner agencies. During this raid, the team supported the Police and eleven potential victims were taken to a reception centre and three people were arrested for various offences including Modern slavery.

Enfield Council played a pivotal role in the formation of the London Modern Slavery Leads Group which Enfield also chairs. It is supported by the London Councils and The Human Trafficking Foundation.

NHS North Central London Clinical Commissioning Group

The Designated Professionals have continued to monitor, and quality assure the North Central

London (NCL) Safeguarding Health Providers Recovery and Restoration Plans for COVID-19. This has demonstrated that there is adequate assurance of the safeguarding elements of all health providers across NCL. Ongoing borough level safeguarding assurance in the delivery of providers' recovery and restoration plans is obtained through Designated attendance at providers safeguarding committees and at local partnership meetings. Where gaps are identified, further assurance has been sought and is monitored at a local level by the relevant borough Safeguarding Adult Lead. There are no plans that required escalation.

NHS North Middlesex University Hospital (NMUH) Trust

The information in this update includes both Children and Adults Safeguarding activities:

- Executive team supported Safeguarding team to remain on site throughout and staff were not redeployed to other areas.
- North Middlesex University Hospital (NMUH) Emergency Department (ED) remained open throughout. As part of the North Central London reconfiguration of paediatric services during COVID, Inpatient services were transferred to Great Ormand Street Hospital (GOSH) during both lock down

periods. Strong links were established with GOSH safeguarding team to manage Child Protection cases and transfer back.

- During first lockdown the total numbers of referrals made remained similar despite ED attendance numbers lower.
- There has been a continued increase in the number of children and adults attending the ED department with mental ill health concerns throughout, which could be COVID related – increase in need for Tier 4 bed.
- Youth on youth violence referrals noted to reduce when schools closed.
- Solace continued to provide telephone support to all our survivors of domestic abuse.
- Throughout the lockdown we have maintained community nursing and midwifery for babies and children.
- Training figures maintained.
- Safeguarding services have continued to be provided at a consistent level. Safeguarding referrals have continued to be completed maintaining pre-lockdown figures.

To read more please see the full Partner update on page 70.

Royal Free London NHS Foundation Trust (RFLNHSFT)

The information in this update includes both Children and Adults Safeguarding activities:

- RFLNHSFT continuity plan was put in place and shared with the safeguarding partners to provide assurance that core responsibilities were being met.
- Maintained a safe staffing level within the safeguarding team even when staff volunteering in other areas.
- Ensured that midwives in the vulnerable women teams were not deployed to other areas.
- Supported safeguarding team to work remotely ensuring staff and partner agencies continue to have access to RFL NHS Foundation Trust's Safeguarding Team.
- Children and adult safeguarding training continued either virtual or face to face and training figures maintained.
- Enabling virtual access to the ward so other professionals, family members and relevant people have access to ward staff and patients when necessary.

- Adjustments in place to allow visitor to accompany or visit a person with a learning disability.
- Attendance at virtual child protection case conferences, strategy meetings and core groups.
- Provided safeguarding supervision to case holders, such as community midwives through virtual platforms which has been highly evaluated.
- Worked closely with other secondary and tertiary Health Trust to ensure inpatient services were maintained for children within North Central London.

To read more please see the full Partner update on page 70.

NHS Barnet Enfield Haringey Mental Health Trust

The information in this update includes both Children and Adults Safeguarding activities:

- Increase in online training.
- Tailor online training to the areas of increased abuse or hidden harm (cuckooing, neglect, financial abuse).

Protect people at risk

- Increase in the amount of safeguarding champions in each team.
- Meeting with teams to promote areas of abuse that require preventative work e.g. teams making lists of those vulnerable to self-neglect and implementing additional monitoring measures.
- Sexual safety measure on wards including the following increase in Sexual abuse during lockdowns and subsequent reduction in S17 leave:
 1. A3 posters for wards – (for staff and patients to raise awareness)
 2. Sexual safety Booklets
 3. Quick grab guide
 4. Temperature check postcards for wards.

Preventative work ongoing looking at effective risk management strategies to reduce incidents of sexual abuse on the wards – white board meeting: standing item on the daily agenda, i.e. daily checks of how safe a patient feels. Practical tips for ward staff, i.e. staff awareness of blind spots, environmental management. Practical tips for risk management of individual patients (e.g. if someone is very sexually disinhibited as part of their illness, what measures are staff putting in place to mitigate risks).

Themes emerging in lockdown 2020/2021

Lower numbers of safeguarding are reported during the peak of the lockdowns in the community and then a sharp rise in safeguarding referrals when lockdowns are lifted has been noted. In line with national trends, Domestic abuse, self neglect, neglect and financial abuse has increased significantly.

There is evidence that there is more “hidden harm” during lockdowns, including grooming on the internet – (radicalisation, sexual abuse). This is evident from more PREVENT referrals from the trust along with more reports of online financial scams. Police report that Cuckooing has increased during lockdowns – staff have had access to Camden and Islington lunch and learn on cuckooing and audits on the response to Cuckooing safeguarding’s have been completed along with promotion of the relevant forums to manage risk. An increase in allegations against staff (especially bank staff) has been noted. This may be because the trust has appointed a PIPOT lead who is collating data within the safeguarding team.

To read more please see the full Partner update on page 70.

CHILDREN’S

Domestic Abuse

The Domestic Abuse Hub has been operating since 1st May 2020 as a response to growing concerns about under reporting of domestic abuse during lockdown. The free-phone helpline and bespoke email are used by the referrer to access the service. The hub continues to operate from Charles Babbage with the line management from the Domestic Abuse service team manager.

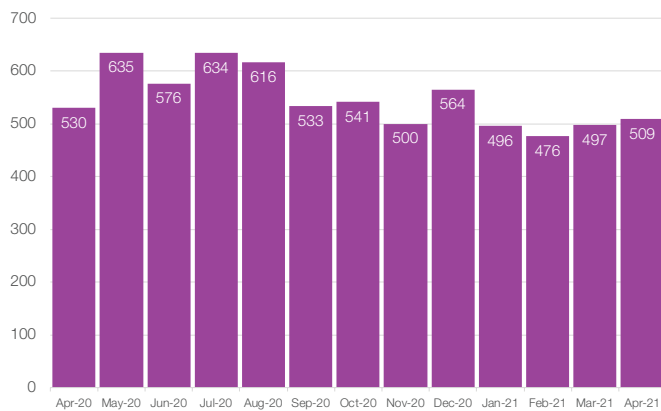
Domestic abuse incidents

In the year ending April 2021 there were 6,539 Domestic Abuse Incidents in Enfield, compared to 5,963 the previous year, an increase of 9.7%. London also experienced an increase of 5.8% over the same period. In the capital, there were 146,773 incidents recorded in 2019/20, compared with 155,262 in 2020/21

There is a decrease in the number of incidents when the lockdown restrictions eased in July with a reduction noted from August to November. The lockdown in January 2021 has not seen an increase in the number of domestic abuse incidents however the reduction is not significant enough.

Domestic abuse incidents in Enfield

Year	2018/19	2019/20	2020/21
Incidents	5,672	5,963	6,539



Domestic Abuse Violence with Injury Offences

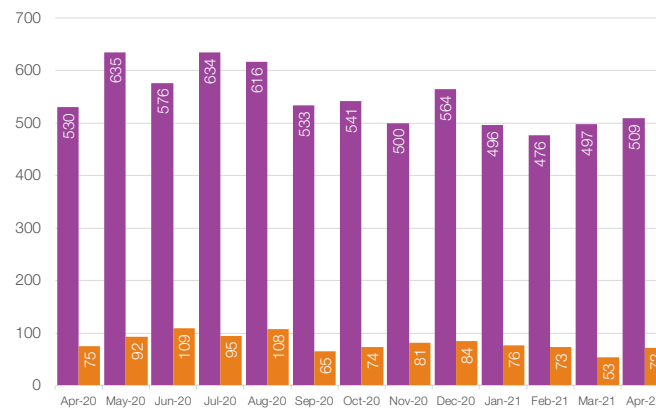
In Enfield by April 2021, there was an increase of 1.7% in the numbers of Domestic Abuse Violence with Injury offences with 984 recorded in 2020/21, compared to 968 recorded by April 2020. In London there was a small 2.7% decrease in the same period.

In Enfield, offences reached their peak in 2020/21 in June, recording 110 offences followed by a second peak of 108 offences in August 2020. January to March 2021 saw a decrease in the number of domestic abuse violence with injury offences however April

2021 has started to see an increase. This could have been attributed to the lockdown.

Domestic Abuse Violence with Injury offences

Year	2018/19	2019/20	2020/21
Incidents	944	968	984



Key: DA incidents DA incidents with injury

Domestic Abuse Hub data

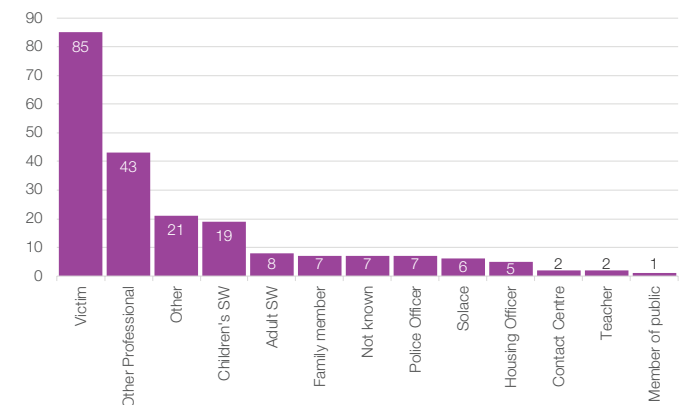
There has been a total of 214 calls received as of May 2021 since the Domestic Abuse hub was launched. The Hub continues to receive calls from professionals and victims requesting support. Since December 2020 there has been a decrease in the number of calls received. There were however more contacts received in the MASH in the same period. We have noted an increase in the complexity and severity of the

domestic abuse being reported which is going directly to the MASH for immediate intervention.

Referrers

The Domestic Abuse Hub continues to be used by victims who are experiencing domestic abuse which is positive. Since January 2021, there has been an increase in the number of professionals referring to the Domestic Abuse Hub for support and advice on behalf of the victims.

Contact referrer



Protect people at risk

Work of the team

The team undertakes structured sessions with the victims of domestic abuse as part of the work to help the victim understand the impact of domestic abuse on their child(ren). This work then informs the child in need plan for the children.

Having received Trauma Informed Practice training, the team are developing tools to undertake effective direct work with children to understand the impact of domestic abuse and early trauma on children's development.

The work with perpetrators as a driver to reduce risk of domestic violence has continued to be a priority in the Domestic Abuse team. There is a dedicated social worker in the team who undertakes risk assessments of all the perpetrators of domestic abuse to inform the social work intervention with the family.

Outcome of contact

Most calls received in the Domestic Hub have led to signposting to other agencies. The majority of the contacts were referred to MARAC 23% followed by Housing where 21% of the requests were signposted to. Having Housing in the Domestic Abuse Hub has led to timely responses to the victims' needs where housing is an issue.

Outcome of Contact Referral (Multiples)	
Other	9
Referral to Housing	46
Referral to MARAC	51
Referral to Solace	18
Referred to Adult services	8
Referred to Children's services	24
Referred to Early Help services	6
Signposted to Children's services	2
Signposted to Housing	7
Referral to IDVA	1
Referral to Police	1

Safeguarding Children

Total contacts into Children's Social Care

	2018/19	2019/20	2020/21
Contacts	29,364	31,427	30,878

Though there was a small decline in 2020/21, the number of contacts into Children Social Care were higher than the 2018/19 levels. The decrease in the number of contacts during 2020/21 was a result of the various lockdowns and visibility of children and young people through the year. There was a decline in referrals to the Children's MASH following the initial lock down in March 2020. The trend

was similar in January 2021 when there was another lockdown with contacts reducing significantly when schools were closed. The anticipated increase in the contact in March 2021 when schools reopened is reflected in the data. The number of contacts relating to domestic abuse or physical violence reflect a similar pattern decreasing during lockdown.

	2019/20	2020/21
Number of MASH Contacts	17,725	19,959

Partnership working in the Children's Multi-agency Safeguarding Hub (MASH) is strong. We launched a daily Emergency Duty Team (EDT)/MASH handover meeting which includes the police and health. This led to more robust and timely information sharing and smoother transitions with clarity on ownership and escalation. MASH Operational meetings with partners have continued to take place and they are an opportunity to enhance understanding of thresholds.

MASH threshold decision making has continued to be robust with ongoing audits reflecting good decision making. In April 2020, an audit of a dip sample of MASH cases found that threshold decision making in MASH was appropriate and proportionate. Ongoing work is being undertaken by the MASH manager to enhance practice.

Protect people at risk

Child and Family Assessments

Timeliness and quality of social work interventions remain good with over 90% assessments completed despite the challenges during the pandemic. This continues a year on year upward trend. Social workers have continued to work with children and seeking through views through direct work

Children Protection

Child Protection Investigations

	2018/19	2019/20	2020/21
Investigations	1,307	1,793	2,078

An increase in Child Protection investigations (Section 47) was noted in 2020/21 (an increase from 1,793 to 2,078) which could be attributed to the pandemic as services in the community were limited and families were in crisis. 82.9% of these investigations led to Initial Child Protection Conference which evidences good threshold decision making.

Children subject to Child Protection plans

	2018/19	2019/20	2020/21
Children	296	203	257

The increase in the number of strategy meetings has also resulted in an increase in the

number of children on Child Protection Plans in the second quarter of 2020/21 (as indicated above) due to the severity of incidents and complexity of referrals received in Children's Social Care.

Children on the edge of care

In March 2021, there were 90 children who had been identified as being vulnerable to exploitation and 23 were discussed at MACE, which is the multi-agency group for exploitation, both in respect of Sexual Exploitation and those at risk of Criminal Exploitation.

A review of services took place focusing on bringing together teams offering support to young people at risk of exploitation and at the edge of care. This led to the merging of the Child Sexual Exploitation and the Edge of Care teams to create the Adolescent Safeguarding Teams.

The new teams are in the process of integrating a unified approach to working with families where adolescents are identified as being on the 'edge of care'. This has involved the teams applying a model of intervention which has proved successful in the early stages of it being adopted in Enfield in enabling 'edge of care' adolescents to remain in the care of their

families. The model of intervention is known as FAMILY. Social Workers in the teams agree an initial Safety Plan with families and will then work through the stages directly with the families they are working with and will bring the case to group supervision in order for the team to check on progress and agree next steps. Early indications of using this model are that this is successful in keeping families together and more work is being done to ensure that the impact is sustainable by building resilience if families.

Missing Children

	2018/19	2019/20	2020/21
Missing Children	159	198	225
Missing Episodes	489	502	561
% RTH Offered	368/489 = 75%	301/502 = 60%	414/561 = 74%
% RTH Accepted	133/489 = 28%	163/502 = 32%	236/561 = 42%
Of these, Looked After Children	49	48	51

There were 225 children reported missing from home or care in the 12-month period covering 2020/2021. Of these, 51 children were looked after children, which makes up a quarter of the total of children who went missing. The

Protect people at risk

Missing Children Coordinators offer return home interviews to all Enfield children and young people in and out of Borough when they return from missing. The above shows an increase in the return home interviews offered since 2019/20 however for some of the young people they go missing again before a return home interview is offered hence figure showing 74%. If a return home interview is not offered, rationale is recorded on the child/young person's file. There is an increase year on year on the uptake of the return home interviews by young people. A review of the services offered to vulnerable children took place and the Missing Children Coordinator is now part of a new Contextual Safeguarding Unit. The additional capacity will help young people to engage with the return home interviews.

The information from the return home interviews is shared with allocated social workers and police and forms part of risk assessment and planning for the young person. The Missing Children Coordinator also offers training to staff including foster carers, commissioned placements and partners agencies.

A new Missing from Home, Care, Education and/or Health Protocol for children was agreed in June 2020 by the Safeguarding Children

Partnership Executive Group. This can be found on our website: new.enfield.gov.uk/safeguardingenfield/policies-and-protocols/

Progress of Children in Care

Support for Children in Care comes in many formats. All children have a personal education plan to identify the areas where additional support is needed, which is agreed by the school, the Social worker, Foster carer and the Head of the Virtual School. Financial support is provided to the child's school to provide additional support in the agreed areas. In addition, the Looked After Children's Health team undertake annual health assessments in respect of children's health needs, and children have access to child and adolescent mental health support where this is needed.

The Virtual school supports children to reach their academic ability and monitor children's progress throughout the key stages, ensuring that they are ready to learn and able to access the curriculum.

Progress of Care Leavers

It is important that young people leaving Local Authority Care are encouraged to strive to achieve their potential.

There are a number of services which work alongside the team to encourage young people to engage with employment and training opportunities. We have been able to ring fence several apprenticeship opportunities within the Council for Care leavers and are hoping to continue this programme.

Enfield's Local Offer for its Care Leavers was updated and launched in 2020, available in different languages and accessible online through Enfield's MyLife website www.mylife.enfield.gov.uk and Enfield's Children Portal cp.childrensportal.enfield.gov.uk

Enfield Strategy for Care Leavers was launched in 2020 which compliments the Care Leavers current offer and focuses on the 6 life GOALS. The strategy includes an action plan, and its progress is reviewed by Enfield's Corporate Parenting Board.

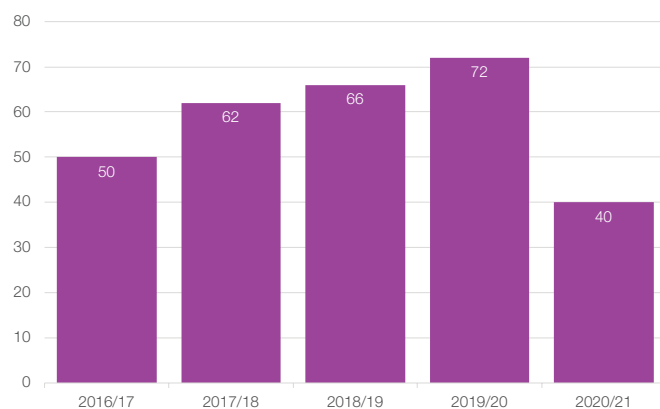
In light of the national social distancing restrictions throughout the Covid-19 pandemic, some participation activities including the annual care leavers conference and use of the care leavers hub had to be suspended and will be reinstated in 2021-2022 in line with the national guidance.

To read more about how we quality assure and monitor our semi-independent care providers please see Appendix B.

Local Authority Designated Officer (LADO) activity

The role of the LADO is set out in the Working Together to Safeguard Children (2018) document. The guidance requires Local Authorities to have an officer or a team of officers to manage and oversee allegations against people who work with children, and that this officer or team are social work qualified and experienced to fulfil this role.

Allegations



The total number of new allegations between 1st April 2020 and the 31st March 2021, which met the threshold for formal LADO involvement was 40. A further 13 cases were initially thought to meet the threshold for formal LADO involvement but did not proceed to an Allegations against Staff and Volunteers (ASV) meeting.

The number of allegations which met the threshold for formal LADO involvement had been increasing over the last 5 years – 72 for 2019/2020. The increase was gradual, indicating consistent thresholds being applied as well as a growing awareness of the role of the LADO. The decline in allegations for 2020/2021 is thought to be due to the COVID affect and specifically the partial closures to schools and early years.

A crucial part of the LADO role, in addition to managing allegations, is also to offer Consultations to agencies on managing low and medium level concerns, where the threshold for an Allegations against Staff and Volunteers (ASV) meeting has not been met. Some of these cases refer to conduct issues for staff in all settings and standard of care issues for foster carers. In addition, a number of cases involve incidents whereby school staff needed to use reasonable force to prevent harm to other children, staff or damage to property (under section 93 of the Education and Inspection Act 2006). It is important to note that in cases where the need for reasonable force is not clear, an ASV Meeting may be held to consider the circumstances and the protocols in place. In 2020/2021, there were 67 recorded consultations compared to 220 consultations during 2019/2020. Again, the decline in the allegations for 2020/2021 is thought to be due to the COVID affect.



Protect people at risk

Training data for 2020-21

Adults Training data	Total
Safeguarding Adults – Awareness	230
Modern Slavery and Human Trafficking	134
Safeguarding – Adult Abuse Awareness	82
Practical Strategies for Building Resilience	19
BIA Refresher	24
DoLS Signatory Training – Legal Update	8
Liberty Protection Safeguards – with focus on MCA Overview	22
Mental Capacity Act/Deprivation of Liberty Safeguarding Awareness	55
Mental Capacity Act for Occupational Therapists	25
Mental Capacity Act Overview in house training	4
Mental Health Act and Mental Capacity Act interaction	16
Understanding the Court of Protection – HCPC Registered Staff	7
Supporting Survivors of Domestic Abuse	18
Supporting Survivors of Sexual Abuse	22
Understanding Domestic Abuse and Coercive Control	16
Making S42 Enquiries	21
Self Harm and Suicide training	21
Suicide training	18
Self-Neglect and Hoard	23
Personality Disorder	27

Children's Training data	Total
Prevent and Radicalisation Workshop	7
Hidden Harm and Substance Misuse	31
Reducing Parental Conflict for people who work with families training	14
Reducing Parental Conflict Course for Trainers	6
Serious Youth Violence Partnership event	100

Children's 3rd sector training	Total
Child Protection	124
Child Protection (refresher)	17
Impact of Parental Mental Health	6
Mindfulness	5
Parenting – including CP	198

Enfield Social Care Centre of Excellence

The Enfield Centre of Excellence (ECOE) is the point of contact for the children workforce where their knowledge and skills, professional development will be supported – to ensure the Children and Family Service deliver the best practice and best outcomes for children and families.

In September 2020, our first cohort of Social Work Apprenticeships started their journey to becoming social workers.

We piloted a different approach with our newly qualified social workers, trialling a cohort system and new readiness to practice programme.

Covid was a catalyst to adopt a different approach to delivering training. All sessions were adapted to be delivered virtually.

Trauma Informed Practice training was delivered to social workers and police colleagues, aim to make them more trauma aware and appreciate the relevance of trauma. Social Workers and the police will understand how to change their behaviour and respond to the impact of trauma and avoid responses that contribute to traumatisation. The learning will help Social Workers and the police to build effective relationships that offer safety and the opportunity to build resilience.

In total there were 128 events that were attended by 1,123 people.

Enfield Children's Social Care Centre of Excellence training courses: 1st April – 31st March (not including AYSE courses or Making Research Count (MRC) Webinars)

Course Name	Number Attended	Course Name	Number Attended
Firstline Team Manager Leadership Programme	4	Parental Mental Health and Parental Mental illness on children and Parenting Capacity	16
Trauma Informed Practice	109	Race, Culture and Spirituality; Implications for child care practice	9
Reducing Parental Conflict (eLearning)	37	Signs of Safety	99
Practical Strategies for Building Resilience	15	Supporting Looked After Children with SEND	14
Understanding Domestic Abuse and Coercive Control	19	Missing Children: A Joint Approach to Achieve Better Outcomes	5
SWET Statement Writing	20	Virtual Reality Training	12
Final Statement Writing for Social Workers	24	Working with Parental Substance Misuse	15
Using Graded Care Profile Tool	61	FGM	38
Supporting Children and Young People Impacted by Domestic Abuse	23	Prevent Training	13
Working with Men	14	Small Steps	6
Court Skills	30	Total	596
Team Around the Family Training	13		

Prevent abuse

In this section we present the work we've done to prevent abuse from happening.

This can include:

- raising awareness about risks so people can stay safe;
- making sure we've identified the right priorities (consultations); and,
- continue to work in ways that can prevent abuse from happening.

ADULTS

Preventing Abuse in Enfield's Adult Care Providers

Enfield has 188 CQC registered providers, one of the highest numbers in London. To manage the risks around Quality and Safeguarding we have a Safeguarding Information Panel to ensure that partners can effectively: share information, identify any risks of harm to those who use services, and prevent any future or additional harm taking place.

The Panel can initiate actions such as Provider Concerns, Quality Checker visits, Immigration Enforcement visits and London Fire Brigade visits. The Panel meets every six weeks. Over 2020-21, the Safeguarding Information Panel,

in addition to information sharing amongst members, received 17 referrals. The following interventions were implemented:

Type of Activity	Total
Provider Concerns Initial meeting held	14
Nurse Assessor visits	11
Immigration enforcement visits	2
Occupational Therapy visits	1
LBE Quality Assurance visits	15
CHAT Team visits	0
LFB safety visits	0
Quality Checker welfare calls made to family and friend contacts of service users	241
Quality Assurance 'Out of Hours' visits	5

The SIP actions and interventions were adapted in line with the covid restrictions in place. Essential visits were made to care providers where risks were high and visits were made with appropriate PPE and robust testing regime in place.

To see more details on the Quality Checker calls please see page 35.

Improvements and Standards in Care homes

The covid pandemic has been a challenging time for social care providers to keep service users/residents and staff teams safe. Effective infection prevention and control measures are key to mitigating risks of cross infections.

To provide support to social carer providers in the borough an Improvement and Standards Manager was appointed and operational from the 1st of November 2020, joining the Local Authority's Strategic Safeguarding team. Using data and intelligence collected from regular calls made to social care providers, an action plan was developed to ensure targeted support and guidance was provided.

Priorities areas from the Action plan are presented below

Organisational learning process for providers that have experienced a Covid-19 outbreak (2 or more staff and or service users/residents that have tested positive at any one time)

- 55 – organisational reviews completed with residential, supporting living and homecare providers
- 125 – recommendations made and implemented by 55 providers

Prevent abuse

- 100 – common themes identified and escalated

Process to audit providers IPC performance and effectiveness

- 55 unannounced visits completed
- 10 follow up visits to providers that have had a covid outbreak ongoing action

Develop partnership working with Public Health to visit providers and provide support to improve vaccination uptake where required

- 15 myth busting vaccination sessions delivered to providers plus 5 joint site visits with Public Health to talk on site any vaccine issues. – Ongoing

IPC support and advice to providers on the Provider Concerns

- 5 visits undertaken – varies from recruitment and retention, writing care and support plans, staff rotas etc – ongoing as and when required.

Pressure Ulcer Panel

Within this strong partnership of NCL CCG, Enfield Directorate has funded and provided an expert nurse in Pressure Ulcers for the

Enfield Local Authority and new NCL CCG Enfield Directorate, Pressure Ulcer Panel. The Pressure Ulcer Nurse has worked with the Pressure Ulcer panel to the highest level to effect a lasting change, to begin the process of improvement in the protection of vulnerable adults open to abuse from developing pressure ulcers. The panel is an advisory panel to the Local Authority Safeguarding Adult Manager (SAM). The Local Authority are responsible for receiving and managing safeguarding concerns, causing others to undertake enquiries when necessary, ensuring the implementation of the Making Safeguarding Personal agenda. The concerns relate to the reporting pathways currently operating between Enfield health providers in the reporting of pressure ulcers for investigation to Enfield Local Authority.

Deprivation of Liberty Safeguards (DoLS)

Item	2018/19	2019/20	2020/21
Application received	1,420	1,470	1,539
Urgent	390 (27%)	540 (37%)	647 (42%)
Standard	1,030 (73%)	930 (63%)	892 (58%)

Over the past three years, we have seen a continuous rise in Deprivation of Liberty Safeguards (DoLS) applications. This has been attributed to more care home managers and practitioners proactively seeking to safeguard vulnerable adults and an overall better understanding of the Mental Capacity Act 2005 thanks to training sessions delivered by the DoLS team.

For the financial year 2020/21, the Enfield DoLS team saw significant rise in the request for urgent applications, this was possibly linked to rise in hospital admissions due to Covid-19 cases. To put this in to perspective, out of 1,539 applications 652 applications were submitted by the Hospital.

CHILDREN'S

Prevention of youth crime and serious youth violence

Enfield Youth Offending Service

Enfield Youth Offending Service continues to see a reduction of first-time entrants. In the financial year 2020/21 there were 98 first time entrants to youth justice, which represents an increase of 15% from previous year. Our analysis indicates that the trend shift showing

Prevent abuse

an increase of the first-time entrants happened in the quarter 3 with causal factors most likely to be attributed to the lockdown 1 release, re-opening of schools and additional focus by Police to suppress violence.

On a positive side, the number of children sentenced to custody was 13 in the 2020/21, which is broadly similar to the previous 2019/20 year when it was 12. There has been a reduction of remand episodes in 2020/21 by 29% (41 remands) from the previous year 2019/20 that saw 56 remand episodes. This is attributed to the high confidence of courts to the bail support package being offered by the Youth Offending Service to young people although the element of the reduced court capacity during pandemic may have had also some impact. Whilst the latest published re-offending data has not been released, we know that we need to provide more support for young people in youth justice to reduce their re-offending. Therefore, we have developed the Youth Integrated Offender Management project in partnership with Police and Community Safety that will be launched in May 2021.

Enfield Youth Services

Throughout all pandemic lockdowns last year, Enfield Council's Youth Service has continued to positively engage with over 1,200 young

people via a detached and outreach youth work, supporting the Police and Community Safety to promote social distancing and compliance, enabling a softer approach to enforce the government guidance.

Despite of the pandemic's challenges to service delivery, Enfield Summer University in 2020 has been successfully delivered through a mixed model of 23 virtual courses and 70 face-to-face courses. The programme provided 1986 Summer University places in the most deprived wards of the Borough that were accessed by 604 children. This is an increase of 23.5% from previous year.

Building on the local Youth Offer of preventative programmes, Enfield Council has been successful in attracting funding of £1.35 million from the Young Londoner's fund for three years starting in 2020. Whilst there were significant challenges to the launch of the programme during last year's pandemic, 5,816 young people have positively engaged with the programme.

Serious Youth Violence

Reducing serious youth violence has continued to be our priority. The levels of serious youth violence year end in March 2021 stood at 264 victims of serious youth violence, showing

a reduction of 47.1% to the previous year in March 2020 when there were 499 victims recorded in Enfield. This is attributed to the effect of the pandemic as well as the continued focus and work of the North Area Violence Reduction Partnership, Community Safety, Police and wider preventative work.

Council's public health has undertaken local needs analysis as part of the public health approach to the reduction of serious youth violence, enabling a deeper understanding of risks associated with serious youth violence and evidence best practice, highlighting the importance of early help and intervention, using evidence-based practice alongside of targeted and enforcement work in Enfield.

In October 2021, new initiative Operation Alliance was launched by Police and supported by Enfield Council to pilot early help and support to young people who have been arrested and presented in the Wood Green custody as part of the wider commitment to diversion and prevention of youth crime. The Alliance partnership is currently evaluating the project and seeking funding to sustain the project.

Community Safety Partnership has continued to attract funding from the MOPAC. This has

Prevent abuse

contributed to the strengthening of the targeted youth support offer in Enfield to keep young people safe through a range of commissioned services such as youth outreach to the A&E, diversionary activities such as boxing, gym sessions, employment support, serious youth violence group worker, St Giles Trust mentoring and Spark2life providing accredited learning programme for children in schools with focus on staying safe from bullying, exploitation and risky behaviour.

Serious Youth Violence event

On the 1st February 2021 the Safeguarding Children Partnership held an event on Serious Youth Violence. The event was a consultation to seek partnership views on the findings of the Public Health needs assessment to Serious Youth Violence, and to highlight some of the work that has been taking place. The event was attended by over 100 delegates and opened by young people giving their experiences.

Raising awareness in schools about exploitation

The Covid-19 pandemic, national restrictions and school closures during 2020/2021 has meant that face-to-face raising awareness

activities about child exploitation involving the Child Sexual Exploitation Prevention (CSEP) team could not be delivered as planned. These activities will be reinstated as national restrictions are eased and in line with national guidance. Despite these challenges, the CSEP team continued to work closely and collaboratively with schools through provision of advice and knowledge sharing where children/young people were identified as being at risk of exploitation.

During the year between 1st April 2020 and 31st March 2021, 181 young people were identified as either experiencing or being at significant risk of child exploitation including 14 repeat referrals. 100 were at risk of child sexual exploitation, 72 at risk of child criminal exploitation and 9 were at risk of both. This figure is higher than the last full year analysis where 166 young people were identified in 2019-20. This is a 9% increase which suggests that there is more awareness leading to a larger number of referrals.

Reducing Parental Conflict

Conflict between parents is a normal part of relationships. However, there is a large body of evidence that shows that parental conflict puts children's mental health and long-term outcomes

at risk when it is frequent, intense and poorly resolved. These destructive conflict behaviours include aggression, non-verbal conflict, lack of respect and emotional control and in their most extreme form, domestic abuse.

The risk of conflict between parents is higher at crucial transition points in family life, such as becoming pregnant, having a baby, starting or changing school, or separation and divorce. However, relationship difficulties are often seen as a private matter and couples tend to only seek help when they are in crisis.

In Enfield, we are working with the Department of Work and Pensions, and the Early Intervention Foundation. The Change and Challenge Service with the Safeguarding Partnership Business Unit have introduced RPC training courses, to frontline practitioners and managers, across the Safeguarding Children partnership.

In 2020/21, e-learning for 200 members of staff have been commissioned and are being delivered.

Joint Services for Disabled Children

The Joint Service for Disabled Children is comprised of the specialist social work service, preschool support home visiting service, early

Prevent abuse

years keyworker service and a specialist short breaks and family support service.

New referrals to the JSDC of children 4yrs + for short breaks and family support:

- April 2017 – March 2018: 169
- April 2018 – March 2019: 180 (up 7%)
- April 2019 – March 2020: 234 (up 30%)
- April 2020 – March 2021: 150

The pandemic impacted on the number of new referrals received during the last year.

Services are delivered in house 7 days per week at Cheviots, specialist play and home care providers are commissioned, and families can also access a personal budget to arrange the support that best meets their child and family's needs.

The services and support are designed to provide fun activities for the child, an opportunity to meet with their friends or be supported to access community activities and provide a break for the parent from their caring responsibilities to support family life.

Transforming Care

We increased the frequency of the multi-agency Dynamic risk register meetings to weekly to ensure that children and families

most at risk were supported effectively and to ensure that there was communication across the professional network

To read more please see the update in Appendix B.

Private Fostering

Private fostering is when a child aged under 16 years (or under 18 if disabled) is cared for, on a full-time basis, by an adult who is not their parent or an immediate relative, for a period of 28 days or more. This is a private arrangement made between the parent and the carer. There is a legal requirement to notify Children's Social Care about private fostering arrangements.

Since transferring private fostering to the Fostering Service, there has been a drive to develop partnership working. Raising awareness about private fostering has been an important communication aim for the Safeguarding Children Partnership. Meetings with the Safeguarding Board have been held to discuss raising community awareness. A new leaflet has recently been produced titled "Are you Looking After Someone Else's Child" which was shared and approved by Enfield's Children's Partnership. How to report private fostering arrangements into Children's Care has been included in all our Safeguarding

Enfield Newsletters. 6-weekly meetings have been held with consortium partners to share ideas and develop partnership initiatives, e.g. consortium private fostering webpage. Enfield's children portal has been reviewed to encourage referrals from the public.

In 2020-21, 13 private fostering cases were open to the Fostering Team, 4 less than the previous year. A number of cases were closed as a result of the young people turning 16 years of age, children returning to their parents' care and young people from overseas returning to their country of origin. During the pandemic, a reduction in overseas students was observed compared to the previous year. At the end of 2020-21 there were 4 privately fostered children/young people in Enfield. Historically, nationally and locally, there has been low numbers reported of children and young people in private fostering arrangements which fluctuates throughout the year.

We have an action plan in place for 2021-22 to continue to raise awareness with consortium counterparts.

Work in schools

Over the year, our Education Department and Educational Psychology Service worked with our schools to ensure home learning could

Prevent abuse

take place and provided support for parents, carers, and children.

COVID response specific work included:

- Provided weekly home learning ideas for over 400 Private, Voluntary or Independents (PVI)s, schools and childminders.
- Supported 400 schools, PVI)s and childminders on key transition points for children and young people, including providing Early Years transition for vulnerable pupils.
- Created and sent out over 4,000 Year 6/7 transition packs to all pupils in Year 6 in Enfield including for vulnerable pupils.
- The Educational Psychology Service (EPS) provided telephone support line for parents, with schools' agreement to use their statutory visit time for this purpose.
- EPS provided support for staff and headteachers during the year, including whole school wellbeing.
- EPS supported 14 schools to achieve the Sandwell Charter Mark, which supports a whole school approach to social, emotional and mental health.
- EPS and Professional Learning (PL) team set up a ten session programme of PL

to support schools in their resilience and recovery work for all pupils.

- Schools' Traded Service worked with school to support food vouchers and/or food parcels to go to the most vulnerable families.
- HEARD and Nexus have put on three well attended parent workshops.

Wider work of Enfield Council Education department

- Set up a ten session Professional Learning (PL) programmes, including local, national and international expertise, re: Unconscious Bias and Anti-Racism as a response to the Black Lives Matter movement.
- A three session Governor training course re: Unconscious Bias and Anti-Racism has started as a corollary to that training.
- Set a ten session PL programme re: Digital Transformation for schools which included national expertise for online safety in both primary and secondary schools.
- A new Designated Safeguarding Leads (DSL) network for school DSLs has been set up.
- The School and Early Years Improvement Service (SEYIS) adviser visits to schools included questions about the remote

learning offer. This checked that all pupils were being contacted and how schools reacted to any lack of response from a pupil or family.

- Whole service Safeguarding training took place in September 2020.
- All NQTs were able to join LA run safeguarding training within their first half term.
- Trauma Informed Practice in Schools (TIPS) was promoted via two taster sessions open to schools and all members of the Education Service.
- Nexus funded training for all schools from Pivotal education linked to restorative practice and TIPS.
- SWERRL/BSS have supported vulnerable pupils in their return to school.

Learn from experience

Here, we discuss the various tools that the Enfield Safeguarding Partnership uses to understand where things might have been or are going wrong and learn lessons.

Outcomes and findings from all our reviews are used to promote a culture of continuous learning and improvement across the partner agencies. The processes here are required by law, either the Care Act for adults safeguarding, or Working Together for children's safeguarding.

ADULTS

Care Act 2014 (Adults)

The Care Act places statutory functions on the Board. One of these is in relation to review events and practices when things go wrong. The Safeguarding Adults Board must conduct a Safeguarding Adult Review (Section 44) should an adult with care and support needs die or experience serious harm, and abuse or neglect is suspected, and where there are concerns about how partners worked together.

What is a Safeguarding Adults Review?

A Safeguarding Adults Review (SAR) is a process that investigates what has happened in a case and ultimately identifies actions that will reduce the risks of the same incident happening again. The investigations are completed by people who are not involved in the case.

Safeguarding Adults Review referrals in 2020-21

A referral was received regarding the care and support received by a man who was the main carer for his wife. In April 2020, the referrer was advised this would not progress to a SAR.

A referral was received regarding the care and support received by a man living alone in Enfield. In November 2020, the referrer was advised this referral would be progressing to a SAR.

Safeguarding Adults Reviews in Progress

A review which was agreed in December 2017 in response to the care and treatment to an older woman living by herself is still ongoing. The review will be completed in 2021-22.

A review which was agreed in December 2017 in response to the systemic financial abuse of service users over a number of years is still in progress. The review will be reported in 2021-22.

A review was agreed in December 2019, about how partners provided care and treatment to a man. The review will be reported in 2021-22.

Published Safeguarding Adults Review

During 2020/21, one SAR was published. The review for Sophie was approved in March 2021. This can be found on our website.

Key recommendations from the SAR included:

- A multi-agency (health, housing, environmental health, social care, mental health) Task and Finish Group to draw up and implement lasting improvements to practice and services aimed at safeguarding and promoting the welfare specifically of people at risk of self-neglect.
- Partner agencies should ensure their records capture the detail and rationale for actions and decisions and have processes for timely information sharing.

Learn from experience

- When children and young people move to live permanently in the UK and are known to social care, support should be given to ensure their Rights under UK legislation to be included in CYPS plans, Pathway Plans, Transition Planning etc. Likewise support to be offered in Adult Social Care via Information and Advice as per the Care Act 2014.
- Independent Reviewing Officers to ensure that transition plans are in place for all Looked After Children and Adult Social Care invited to final Looked After Children Review.
- Understanding Mental Capacity/Executive Capacity and Self-Neglect/Deliberate Self Harm to be included in future training programme.
- Review how agencies work together on risk, by the development of a shared risk management plan.

Learning Disability Learning from Lives and Deaths Programme (LeDeR)

As from the 1st April 2017, it has been an NHS priority for all deaths of children (4-17) and adults (18+) with learning disabilities to be notified to the Programme. Information on the programme is available at leder.nhs.uk/about

The programme is coordinated on a CCG level, with each CCG contributing to the national annual report.

At a Borough level, steering groups are responsible to developing action plans implementing local and national learning. Enfield has a well-established steering group including representatives of the Local Authority, Enfield CCG, Barnet Enfield and Haringey Mental Health Trust, North Middlesex University Hospital NHS Trust, Royal Free Hospital NHS Trust. The steering group reports to the Safeguarding Adults Board and NCL CCG.

Programme update

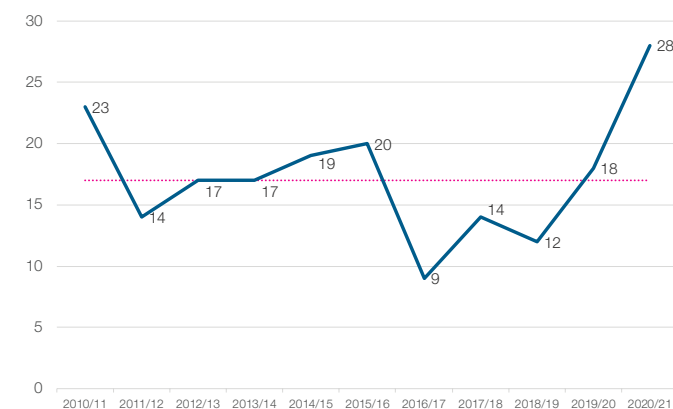
The University of Bristol had been commissioned to deliver the programme up to the end of May 2021. NHS England have decided to directly take forward the delivery of the programme, and have developed a new, more streamlined online platform and a new policy with a greater focus on delivering actions. After a brief hiatus the new systems are now running.

Data

During 2020/21, 28 notifications of death were received for people with learning disabilities who were registered with GP's in Enfield. This

is double our 4-year pre-pandemic average of 13.25 deaths per year. The previous 10 years data for adults in Enfield had shown a general reduction in mortality. During the pandemic, this trend has disappeared.

Crude Mortality Rates – Adults Eligible for Services



The Coronavirus Pandemic was, by far, the dominant factor in the deaths of people with learning disabilities in Enfield this year. Of the 26 people where information from death certificates was available:

- 19 deaths involved Covid-19
- 23 of these deaths were caused by, or contributed to by, respiratory infections.

Learn from experience

It is also notable that Covid-19 is the highest contributing factor to death to people with learning disabilities in Enfield over the last 4 years.

Between the end of March and early July, the programme requested 'Rapid Reviews' be completed, where Covid-19 was suspected to be significant. In Enfield this included 13 people. All of these people had long term health conditions. 8 people had 3 or more health conditions. This seems very significant, and it would be helpful to look at these issues nationally.

Within NCL, the proportion of notifications made by Enfield was higher than in previous years. Data on monthly notifications by Borough received from NCL at the end of June 2021 shows this was concentrated in April 2020, when Enfield notified 11 deaths. The next highest borough reported 4 deaths in that month. ONS data suggests the increase in mortality in the whole population in Enfield was higher than the other boroughs in this period. The Steering Group is undertaking a systematic review to attempt to understand the factors that led to this discrepancy.

Performance

Of the 28 notifications, 21 reviews have been completed (75%). Of the 7 remaining reviews –

- 3 were on hold for other enquiries
- 2 did not pass local quality assurance process and need further work
- 2 were received during the transition period to the new platform

There were no end of year targets this year. However, there was an expectation that all reviews notified before the end of June 2020 (that were not on hold) would be completed by 31st December 2020. Enfield achieved 100% of this target. The London average was 92%.

Due to the need for local reviewers to deliver direct support during the pandemic, NCL CCG commissioned external reviewers to complete these reviews.

Action from Learning

The significant level of respiratory deaths has led the steering group to apply for NCL Health Inequalities funding for a specific respiratory health project to:

- Implement the escalation protocol
- Partner with specialist dentistry to improve oral health
- Partner with smoking cessation services to improve access for people with learning disabilities
- Trial the App

- Support the 'My Health Matters' group to engage with partners to increase access to exercise for people with learning disabilities and improve fitness.
- Reduce obesity
- Work with providers to improve management of constipation

Other actions include:

- Work with Acute trusts to improve compliance with DNACPR guidance and improve Mental Capacity Act and Best Interest processes.
- Increase quality of Annual Health Checks and increase the number of Health Action Plans produced.
- Work with the 'My Health Matters Group' to create resources and a referral pathway for people identified as being obese or having hypertension at annual health checks.

A more complete Enfield LeDeR report will be published on the End of Life Care page on MyLife once updated to include latest NCL information.

CHILDREN'S

Local Child Safeguarding Practice Reviews during 2020/21

One local learning review was started at the end of 2018-19, focusing on neglect suffered by children whilst in the care of their parents, where there were concerns about substance misuse and domestic abuse. The review was presented as part of the Partnership day in January 2020.

The Local Authority referred 2 cases, one of a child and another for young people, who both had tragically died to the National Child Safeguarding Practice Review Panel during 2020/21.

For the case relating to the child, the National Panel agreed with the Safeguarding Children's Partnership that the rapid review meeting and report had provided sufficient analysis and learning. A multi-agency action plan is in place and overseen by the Children's Safeguarding Partnership.

For the case relating to the young person, a Local Child Safeguarding Practice Review is underway.

NCL Child Death Overview Panel (CDOP)

The NCL Child Death Review partners held five (5) panel meetings in 2020/21. In addition, the panel arranged one (1) neonatal focussed panel with the leads from the neonatal network. The group held an extraordinary panel in January to manage a backlog of cases, some of which could not progress due to the establishment of the new system and the impact of the pandemic.

Each provider Trust in NCL now has an identified Child Death Lead Doctor in place with most moving to a Single Point of Contact administrator within the organisation. There remains a need for community Single Point of Contact to manage child deaths where the child is not taken to an A&E department. The community SPOC along with the Designated Doctor for Child Death co-ordinate the initial investigation process for community deaths.

A business case for joint funding with the five (5) Local Authority areas was agreed by the CCG which will see the establishment of a full time team to support the oversight of all Child Deaths in NCL. The business case included funding for a co-ordinated bereavement support offer for all families in NCL, as well as support and training for key workers. The key

worker role is a new statutory requirement and each family must be assigned an identified worker.

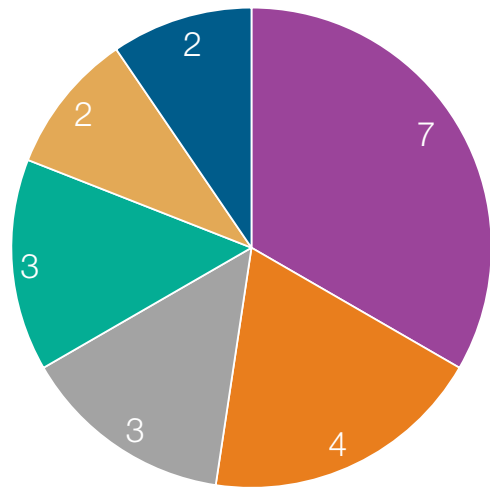
The business case also included funding for eCDOP. eCDOP is an electronic system that supports the administration process for notification of a child, gathering information and supports the Child Death Review meetings held by the hospital. In the summer of 2021, the NCL CDOP will move to one (1) eCDOP platform.

In February, 2021 the panel hosted an online training event on Sudden Unexplained Death in Infancy. The event was attended by over 120 practitioners across NCL, including colleagues from police and social care. SUDI claims the lives of 230 babies in the UK every year (Lullaby Trust, 2020). Many of these deaths could be avoided if environmental modifications are made and at-risk families are identified for additional targeted prevention support. It is the role of all health professionals caring for pregnant women and families with babies and children to discuss SUDI and modifiable risk factors. The event was positively evaluated with requests for further training to the multi-agency audience to ensure partners understand each other's roles in the responding to a SUDI.

Learn from experience

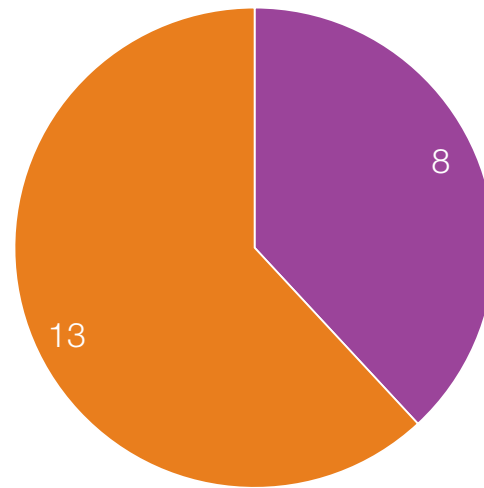
Between April 2020 and March 2021 Enfield had 21 notifications of child deaths similar to the previous year (death of a person under 18 years of age). Of the 21 deaths, 13 were male, 8 were female.

Age range



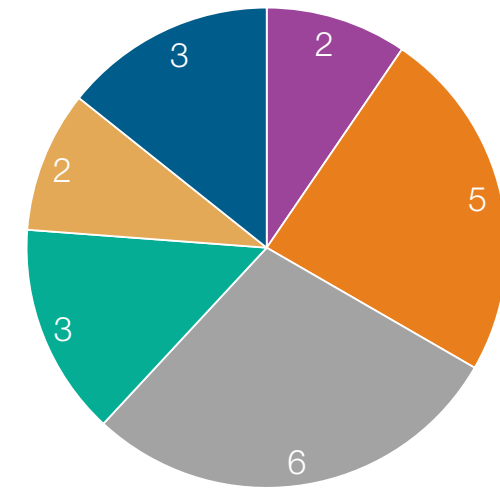
- 0-28 days
- 29-364 days
- 1-4 years
- 5-9 years
- 10-14 years
- 15-17 years

Gender



- Female
- Male

Ethnicity



- White - British
- White - Any other white background
- Black or Black British
- Asian or Asian British
- Mixed
- Other - any other ethnic group

Further detail will be included in the NCL CDOP annual report.

Improve Services

We have a number of processes to help us improve the quality of our services. This is an important part of managing safeguarding risks.

Some of these processes are national, for example, OFSTED inspections, and others are local, for example, the Quality Checkers.

They all have a role to play in making sure our services and safeguarding responses meet local people's needs.

ADULTS

Supporting Enfield's Adults Social Care Providers

Enfield has one of the largest number of care providers in London, including 81 care homes.

All registered providers are monitored by the Care Quality Commission.

Care Act 2014 (Adults)

The Care Quality Commission (CQC) is an executive non-departmental public body of the Department of Health and Social Care of the United Kingdom. It was established in 2009 to regulate and inspect health and social care services in England.

Provider Concerns

Provider Concerns Process

Our Provider Concerns process was initiated 14 times in the year through our Safeguarding Information Panel. The process brings together the organisations that are involved with a care provider to discuss concerns and risks, and work with the provider to make improvements for the residents or service users. The process can include a suspension on new placements, or in some cases, particularly if there is a risk of deregistration, an exit strategy.

Analysis of the data from the Provider Concerns process demonstrates that where the process is initiated in response to a poor CQC inspection and rating, it has consistently driven service improvements and improved CQC rating following re-inspection. Recently,

two providers with an 'inadequate' rating in one or more of the CQC domains were re-inspected and achieved a 'good' rating.

The Provider Concerns process was developed in Enfield, but now forms part of the Pan-London Safeguarding policy and procedures. The policy can be found on the MyLife Enfield website. Go to: www.enfield.gov.uk/mylife

Care Quality Commission Rating Data

The most recent ratings (2020-21) are presented first, followed by 2019-18 and finally 2018-17.



Improve Services

Row Labels	Outstanding	Good	Requires improvement	Inadequate	Registered but not yet inspected	Total
2020-21 (ratings at the end of March 2021)						
Community based adult social care services	1%	67%	5%	0%	27%	107
Nursing home	0%	62%	31%	0%	8%	13
Residential care home	3%	78%	13%	1%	4%	68
2019-20 (ratings at the end of March 2020)						
Community based adult social care services	1%	64%	11%	0%	23%	90
Nursing home	0%	67%	33%	0%	0%	12
Residential care home	2%	79%	8%	4%*	7%	85
2018-19 (ratings at the end of March 2019)						
Community based adult social care services	1%	64%	12%	1%*	22%	94
Nursing home	0%	69%	31%	0%	0%	13
Residential care home	0%	83%	11%	3%*	3%	71

*All Inadequate provision have been subject to Enfield's Provider Concerns Process.

Nurse Assessor

North Central London Clinical Commissioning Group and Enfield Council jointly fund a nurse assessor, who provides specialist clinical advice as part of Safeguarding concerns, and Provider concerns processes. The Nurse assessor focuses a lot of attention on resolving issues in Nursing homes in the borough.

Quality Checker projects

The Quality Checker has continued to go from strength to strength with new volunteers recruited and new work projects going forward. During the reporting period the Quality Checkers have completed the following activities.

QC Activity conducted in 2020/21	Number of visits calls (QC volunteers visit in pairs), reports, publications and toolkits developed and circulated
Welfare calls to residential care providers and friends and relatives of people living in residential care	Quality Checkers supported the Council and residential care providers in the borough by making contact with all providers 2x weekly to collect information on Covid-19 infection rates and to provide support with PPE.
Calls to people in receipt of day-care services	Quality Checkers made 65 welfare telephone calls to people who attended day centres but due to Covid were not receiving services. Quality Checkers asked questions relating to safety and wellbeing. Our feedback was shared with LBE teams in ASC.
Calls to friends and relatives of people living in residential care	Completed 241 calls to friends and relatives of people living in residential care to find out what providers where offering relatives to help them keep in touch with their loved ones during lockdown. To collect feedback on wellbeing of friends and relatives who were unable to visit their loved ones during lockdown. Our feedback was shared with wider LBE teams.
Calls to people in receipt of homecare services	Completed 209 calls to people in receipt of homecare services to collect data on wellbeing and safety during lockdown.
QC laptops	Quality Checkers have been provided with Council laptops to enable them to continue with Quality Checker projects, but working remotely.
QC volunteers piloted smart tech project equipment	Three volunteers used assistive technology equipment and gave feedback to the project.

The ways of working were adapted in line with government guidance during the pandemic. Visits made to care providers and people that use services were suspended and volunteers were issued with laptops to be able to join 'teams' meetings and make and record calls to gather a range of feedback. Much of the work for this period has focused on the organisational learning from the pandemic. This includes from care providers and people that use services and their carers. This feedback will support the councils organisational learning project to ensure lessons are learnt and good practices are identified and embedded for future planning.

Improve Services

Person in Position of Trust (PIPOT)

PIPOT is a safeguarding adults process. It applies where there are concerns about a person's ability to work safely with adults at risk.

These concerns will generally relate to something that has happened outside of work – e.g. a racially motivated crime, domestic abuse or a child protection case. The process considers the allegation and determines whether a disclosure needs to be made to their employer or registering body.

Statutory agencies will have their own PIPOT processes in line with Safeguarding Adults Board policy. The Safeguarding Adults Board policy can be found here: [click here](#).

CHILDREN'S

Checking Enfield's Safeguarding Children arrangements

The Safeguarding Children Partnership organisations are required by law (Sec 11 Children Act 2004 and Working Together 2018) to undertake a regular assessment of the effectiveness of their arrangements to safeguard children and young people at a strategic level.

This was undertaken through a workshop on the 4th November 2020. Agencies provides responses against eight standards. The Partnership also sought feedback on steps taken to improve awareness of private fostering, and issues relating to responses around sexual abuse in the family environment.

Actions from the workshop included:

Are there any actions required to improved effectiveness?	How will you do this?
Agency: Safeguarding Ambassadors	
Improve professional's knowledge of impact of not hearing the voice of children and young people	Voice of Child and Young People video
NCL CCG, Enfield Directorate	
Improve young people's awareness of rights when with health professional	Video by CCG aimed at highlighting rights when in health settings, to presented to school assemblies and on Safeguarding Enfield website

Safeguarding Ambassadors

Weekly meetings took place with our Youth Leaders to co-produce a training programme for a role as an Enfield Safeguarding Ambassador. The training will be used to train the 2021-22 cohort of ambassadors. The Safeguarding Ambassadors met with the safeguarding Partners as part of Enfield's Section 11 audits.

During lockdowns the group met online with mixed results. When the group returned to the youth centre we were able to start planning the video on voice of children and young people; and begin the process of recruiting the next cohort of ambassadors. The first group of Safeguarding Ambassadors are helping to deliver the co-produced training.

Communication

A new website platform has been developed at: www.enfield.gov.uk/safeguardingenfield. The content is now being reviewed, with a focus on increasing the amount of multimedia/video content. Regular newsletters have been to both the adults and children's partnership, highlighting the work of the partners and key issues.

Review of Safeguarding Partnerships and annual reports of national panel

The following reports have been published over the past few months and the Children's Safeguarding Partnership's Executive and Practice Improvement groups will be reviewing the learning and using this to steer our work over the coming year.

- **Sir Alan Wood's report on the implementation of new multi-agency arrangements to safeguard children**
<https://www.gov.uk/government/publications/wood-review-of-multi-agency-safeguarding-arrangements>
- **Child Safeguarding Practice Review Panel Annual Report for 2020**
<https://www.gov.uk/government/publications/child-safeguarding-practice-review-panel-annual-report-2020>
- **An overview reports from What Works for Children's Social Care – Analysis of Safeguarding Partners' Yearly reports 2019-20**
https://whatworks-csc.org.uk/wp-content/uploads/Analysis_of_Safeguarding_Partners_yearly_reports_2019-20_Overview_report_May2021.pdf

Independent Scrutineer statement:

Since the national and local children's safeguarding arrangements were changed in the Autumn of 2019, various reports and enquiries have been published challenging annual reports to:

'move away from descriptive accounts that focus on detailing actions taken, to focus instead on setting out the evidence behind approaches and their impact.

The overarching safeguarding system must understand the 'impact' of the partnership activities and consider what improvements might be needed.

What and where is the evidence that children are kept safer?

What assurance can the communities of Enfield have in the partnership?

How is continuous learning fed back into the system?

During 2020-21 safeguarding activity did experience some COVID related disruption although all partners worked hard to minimise the extent of this and to do as much as possible to maintain good practice.

As part of the scrutiny function the partnership has brought in an external case reviewer who has produced a multi-agency audit plan, following on from the focus on neglect which has taken place over recent years. The impact here is measured and reviewed on a regular basis by the multi-agency Performance Improvement Activity Group.

The young safeguarding ambassadors group has worked with the Business Unit and produced a video which was used and watched at the Serious Youth Violence learning event in February. The impact of this activity whilst tricky to measure is likely to be more active involvement of young people. Children need to be seen and play a central role in services that should have them as their focus.

There is now a multi-agency dashboard developed by police colleagues that enables data to be interrogated by the Executive Group. The impact of this varies although a recent example looked at attendance and participation of GP's at case conferences. Whilst a relatively small cog in the overall system, GP's play an incredibly important safeguarding role and this focus was aimed at understanding the impact of some of the difficulties experienced.

Improve Services

This report is being compiled just as most of the last 16 months lockdown restrictions are being eased. Though many colleagues continue to work face-to-face with families, much of the work moved onto new technology platforms. Whilst on the whole, this been successful, there is more work needed to understand the impact of the pandemic and the various lockdowns on children, young people and families.

Positive developments during 2020-21 include a police colleague and NHS funded activities moving into the Partnership Business unit. The multi-agency responsibilities changed in late 2019, the police and health services now 'share' the safeguarding responsibilities with the local authority. Whilst this presents a considerable cultural challenge having a shared vision and staff working together is a definite improvement.

The shoots of a new culture, with each of the Safeguarding Partners accepting an equal responsibility to safeguarding are starting to emerge.

The revised terms of references, (appendix B) highlight the clearer focus in these groups. The business unit is working to create better methods of communication across the activity groups.

Overall, the children's partnership is a strong one and having risen to meet the COVID challenges I am confident this focus on impact will continue and strengthen.

Geraldine Gavin

Independent Chair of the Safeguarding Adults Board, and Scrutineer of the Safeguarding Children Arrangements

Priorities for 2021-22

The following pages outline the key actions for 2021-22 and how they relate to our overall priorities. You will note that community engagement, and co-production are key themes; as well as using technology and data to better focus the work we do.

What is our objective?	How are we going to do this?	2020-21 Actions	How will we know	2020-21 update	2021-22 Actions
Safeguarding Priority 1: Prevent Abuse					
Engage with our community, to promote a culture where abuse and neglect are not tolerated <i>(Children and Adults)</i>	Create a culture in Enfield where our community has a zero tolerance of abuse and neglect and understands how to report any concerns they may have.	Community Awareness Raising Activity group to develop approach with Third sector starting with website layout and language.	Attendance and feedback from community engagement activity.	Impacted by Covid. New website launched with improved access on devices. Improved accessibility features.	Continue work on website. Develop network of Safeguarding Champions through Community Awareness raising group.
Use technology and social media to engage with our community, professionals, providers and voluntary organisations <i>(Adults and Children)</i>	Improve website a social media presence, so people can stay informed and report concerns; promote developments in assistive technologies and social media options (including video calls).	Develop online resources to support residents to recognise abuse and stay safe. Further develop social media approaches. Ensure learning is presented via videos.	More visits to website, use of social media to report concerns, start to collect feedback on how social media and assistive technologies are helping people through customer audits.	New website developed with videos added. More work to be done.	More social media activity and work with Safeguarding Ambassadors to develop this approach.
Work to reduce isolation (which can increase safeguarding risks) <i>(Adults)</i>	Online training; community engagement to encourage groups to stay in touch with people who might be isolated.	Complete pilot project to introduce 100 devices into homes to support better connectivity with family and friends.	Monitor responses to the isolation question in our social care survey.	Work with Amazon and Libraries to develop project. 10 devices used in initial trial – for staff and service users.	250 devices secured. Pilot project to be expanded to care home. ICES and Libraries to be used as channels to deploy. Work with research organisation to evaluate approach.

Priorities for 2021-22

What is our objective?	How are we going to do this?	2020-21 Actions	How will we know	2020-21 update	2021-22 Actions
Work with people alleged to have caused harm to prevent further abuse (Adults)	Identifying and working with people who will benefit from support and intervention.	Enfield has been selected to be part of National project working with adults who have alcohol dependency.	Evaluation of the programme by professional, and through customer feedback.	A pilot scheme for Rise Mutual, a behavioural change programme for those who perpetrator domestic abuse was run between November 2020 and March 2021. This was funded by the National Probation Service, Children's Services, Adult Social Care and the Community Safety Unit. Enfield continues to work with Alcohol Change UK on developing guidance around this important topic. Workshops were held in late 2020 and further training sessions are being developed for 2021.	Evaluation of the outcomes of this service are taking place at the moment and will determine future plans. Due to COVID-19 delaying some work on the Alcohol Change Project, this will be continuing into 2021/22. The final version of the guidance will be available shortly and the Safeguarding Adults Board will look at recommendations made. Multi-disciplinary training sessions on alcohol and addiction will also take place in the first half of 2021/22.
Raise awareness of exploitation of adolescents to wider partnership (Children)	Ensure Safeguarding Adolescents from Exploitation strategy action is overseen by Vulnerable Young People Activity Group. Ensure on-going awareness on website, in newsletter and through events.	Modern Slavery conference in May; London Modern Slavery conference; Modern Slavery and Adolescent Exploitation on newsletter. Specific section to be built on website. Deliver a conference for local businesses and third sector organisation by March 2020.	Feedback from Safeguarding Ambassadors, Independent Scrutineer, and attendees of events.	Serious Youth violence event highlighted the work being done to tackle issue as well as providing an overview to the Public Health approach.	Further information sharing through social media, website and newsletter working in partnership with Safeguarding Ambassadors.

Priorities for 2021-22

What is our objective?	How are we going to do this?	2020-21 Actions	How will we know	2020-21 update	2021-22 Actions
Safeguarding Priority 2: Protecting Adults at Risk, Children and Young People					
Make sure our community knows how to recognise and report abuse <i>(Adults and Children)</i>	Raise awareness about our Adult abuse line, online resources, and different types of abuse through our marketing and community engagement activity.	Improvements to website; social media. Highlighting how to recognise abuse. Audio tools for people with visual impairments.	Attendance and feedback from community activity and visits to website.	Impacted by COVID. Website launched and videos loaded.	Safeguarding Champions network to be established to take message into community.
Make sure professionals are appropriately trained, with a focus on Making Safeguarding Personal <i>(Adults)</i>	Ensure partners and providers have trained professionals to the required level of safeguarding. Everyone who works with adults at risk should have safeguarding adults basic training, which includes: different types of abuse, including hidden or under reported abuse such as Modern Slavery, Domestic Abuse, Female Genital Mutilation, and details of what to do to report concerns.	Multi-agency training programme based on learning from reviews; and wider statutory changes: focus on Mental Capacity; substance misuse.	Attendance and feedback from training sessions.	Modern Slavery conference online – awareness sessions delivered to over 450 delegates across the partnership Multi-agency training programme focussing on PREVENT, Reducing Parental Conflict and Substance Misuse and Hidden Harm.	Multi-agency training plan is overseen by practice improvement group – includes: LADO, Missing children, Parental Mental Health. Pool of trainers to be developed.
Develop ways to help people protect themselves from abuse and harm <i>(Adults)</i>	Paper and online factsheets; information videos; and links to organisations that can help (e.g. for fraud, home security).	Stay Safe Factsheets to be relaunched; and audio versions made.	Downloads of factsheets; visits to page.	These are on the website.	To be developed further with Safeguarding Champions and Ambassadors once the network is established.

Priorities for 2021-22

What is our objective?	How are we going to do this?	2020-21 Actions	How will we know	2020-21 update	2021-22 Actions
Develop online tool to make sure everyone knows how to access or make referrals to different services <i>(Adults)</i>	Update website with new tool; this will also make sure that as partner organisations change, once updated, other agencies will still know who to contact and what everyone does.	Website section will highlight key services and signpost to MyLife, Children's Portal and Local Offer webpages.	Hits on website, improved referrals, feedback in audits.	Contact list proposed and Intranet site feasibility undertaken.	
Ensure there is effective multi-agency analysis of data/information to understand current and emerging risks <i>(Children and Adults)</i>	Develop work of Insights Activity group to explore current data and methods to create an effective local picture.	Focussing on exploitation data held in different partner organisations, provide a view of risks around transition and the effectiveness of interventions.	Analysis product completed, and response options identified.	Insights group undertaking this – focus has been on transition, CP, MH and violence data.	More analysis of Safeguarding Adults and children's data – more work to understand who is and isn't in contact with us. More detailed work on domestic abuse.

Safeguarding Priority 3: Learning from experience

Check that the way we are managing safeguarding is working properly <i>(Children and Adults)</i>	We have regular checks and an annual adults independent audit and we will work with our neighbours. Checks will include: the user experience and applying the Making Safeguarding Personal approach. We will also work with neighbours to develop consistent London-wide assurance framework, and thresholds. We also conduct the Statutory Section 11 audits for children safeguarding.	Safeguarding Adults Partnership Assurance Tool (SAPAT) will confirm key safeguarding features are present in organisations; Partner updates and data at each Safeguarding Adults Board. Section 11 will take place, with input from Safeguarding Ambassadors.	Audit reports (including Section 11) and confirmation from partners of the actions they have taken.	Section 11 – Completed and included feedback from safeguarding ambassadors of their meetings with the Executive Safeguarding Partners.	Section 11 learning to be reviewed. SAPAT being organised with Haringey in a peer-challenge format.
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Priorities for 2021-22

What is our objective?	How are we going to do this?	2020-21 Actions	How will we know	2020-21 update	2021-22 Actions
Learn from the advice of our Service Users, Carers and Patients (Adults)	Implement learning from Quality Checkers; ask people who have been through a safeguarding process about their experience and make improvements where necessary.	Include feedback of Service users who have had safeguarding enquiries as part of audit processes. (Question introduced on system in 2019/20)	Partners' confirmation of the action they have taken to address issues in feedback.	In July 2019, quality checkers produced friends and relatives feedback report from July 2020 that was shared with the NCL After Action Review.	Quality checker calls to friends and relatives to continue.
If things go wrong, review what happened and learn lessons (Children and Adults)	Identified in Care Act, and Working Together 2018, we have to undertake Reviews, learn lessons, and make system improvements.	Continue to work on publishing SARs, and local learning reviews and analysing learning opportunities based on recommendations.	Audits feedback, data.	Three SAR action plans used to develop.	Process being reviewed.
Learn from the experiences of other local authority areas (Adults)	We work with our neighbouring boroughs to learn lessons together. We share our lessons from reviews and will work on checks together.	Continue to work closely with Safeguarding Adults Boards of North Central London area –Barnet, Haringey, Islington and Camden. Commitment to share spaces at SAR learning events.	Annual review and audits to identify improvements based on learning from other boroughs.	COVID impacted – much of the learning is a London level – e.g. Insights work by ADASS.	Continue with regional analysis participation and share Enfield analysis approach about who hasn't contacted services during lockdown.
Improve sharing of learning between adults and children's safeguarding (Adults and Children)	Establish Practice Improvement Activity group by September 2019. Ensure discussions relating to children's and adult's issues are influencing improvements.	Practice Improvement group has considered learning for one children's Local Learning Review, and at the April meeting will input on recommendation of Safeguarding Adults Review.	Group established and has met. Terms of reference agreed. Minutes from meetings.	Practice Improvement meeting considers adults and children's reviews and provides the opportunity to learn across both areas.	Joint meetings to continue.

Priorities for 2021-22

What is our objective?	How are we going to do this?	2020-21 Actions	How will we know	2020-21 update	2021-22 Actions
Safeguarding Priority 4: Supporting Services Improvements					
Ensure we have effective arrangements in place to intervene when provider quality drops below expected standard (Adults and Children)	Support Enfield services to improve, due to quality standards, whenever possible.	Provider Concerns policy being reviewed and relaunched.	Number of Provider concerns/improvement processes and key issues addressed.	During lockdown, providers were contacted regularly to offer support.	Provider Concerns policy will be reviewed. Infection Control action plans will be developed to support all providers, learning lessons from last year.
Ensure partners share information and intelligence about poor quality services (Adults)	Ensure there are arrangements in place to share information properly about services so that partners can act quickly to respond to unsafe services.	More detailed data analytics to be introduced into meetings.	Regular meetings with partner agencies and evidence of actions.	Safeguarding Information Panel meetings continued through the year.	Safeguarding Information Panel meetings to continue.
Online space for providers (Adults)	Develop online presence to share information, policies and best practice with providers to ensure organisations have tools they need to improve.	Develop Safeguarding information for providers as part of new website.	Traffic on website; download of resources.	This has been set-up on MyLife. Including information such as infection controlling, public information, and the Winter Plan.	The web space will continue to be updated in line with government guidance.
Consistent policies with neighbouring boroughs (Adults)	Make sure Enfield has clear and consistent policies with neighbouring boroughs which represent best practice in all areas.	Safeguarding Adults Partnership Assurance Tool (SAPAT); London wider exercise will be conducted. Continued participation in National work on defining and recording enquiries.	Audits, and data analysis will confirm consistence of practice.	North Central London meetings and work have been impacted by COVID. We have shared information about assurance activities of the Safeguarding Adults Board.	Continue to work across London around the COVID analysis. Undertake SAPAT.

Priorities for 2021-22

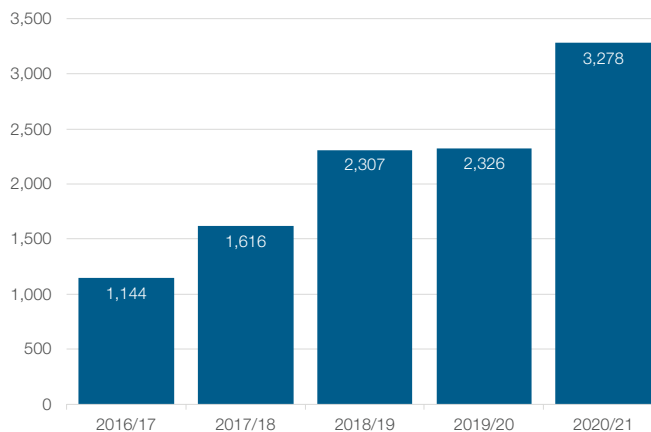
What is our objective?	How are we going to do this?	2020-21 Actions	How will we know	2020-21 update	2021-22 Actions
Ensure the voices of children and young people, as partners and scrutineers, are built into our Safeguarding Partnership work (Children)	Recruit 8 children and young people to scrutinise and develop our arrangements.	8 young people will be providing feedback on Scrutiny of safeguarding children's arrangements (incl. Sect 11).	At least 8 young people recruited and working with us on projects (website, Section 11 audits).	10 Safeguarding Ambassadors recruited and training programme co-produced. Ambassadors met with the Safeguarding Partners and were part of the Section 11 process.	Next cohort of Ambassadors to be recruited. Work on Voice of the Child short film as identified by in Section 11 work.
Ensure we have consistent effective practices across the partnership to safeguard children and young people (Children)	A multi-agency audit programme that is agreed with partners.	Planning for the 2021/22 programme and consultation on methodologies took place.	Completed audit reports; improvements in practice.	NCL CCG funding as part of Practice Improvement support. Lead who adds children's safeguarding expertise into the business unit recruited.	Methodology and programme of audits agreed. Focussing on Professional Curiosity and Information sharing; children affected by domestic abuse; serious youth violence.
To improve communication between workstreams and Exec and activity groups (Children and Adults)	Progress report using a project management approach.		Better awareness of members of our partnership groups about what is happening across the whole.	Tested various systems (Pentana, MS Project). Chairs and Exec meeting organised.	System in place and working across groups.

Appendix A: Detailed Safeguarding Adults Data

Safeguarding Adults Concerns from 2016/17 – 2020/21

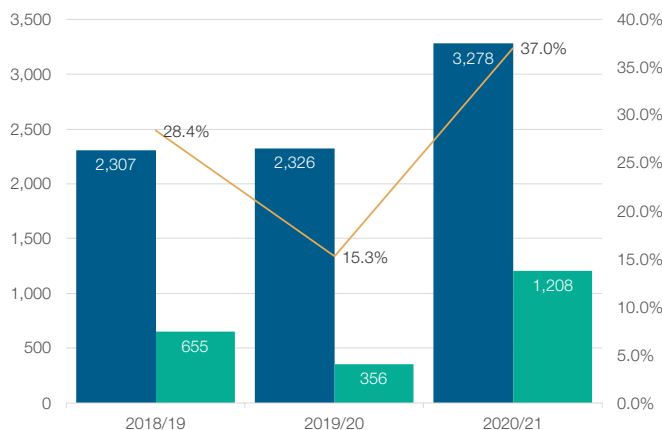
These trends are consistent with the national year on year increases in safeguarding adult concerns. In Enfield, this is due to increased awareness of concerns that should be reported into our Safeguarding Team, and the partnership working. The 2020-21 figure includes the increased concerns that were report in due to COVID-19, the increase was also noted nationally.

Safeguarding adult concerns



- Total number of Concerns in 2020/21 = 3,278 (2019/20 = 2,326; 2018/19 = 2,305)
- Of these, 1,208 went to section 42 Safeguarding Enquiries (2019/20 = 356; 2018/19 = 655)
- Conversion Rate = 37.0% (2019/20 = 15.3%; 2018/19 = 28.4%)
- The remaining 2,070 Concerns have received some form of other safeguarding/preventative measure (e.g. information and advice)

Overall Concerns and Enquiries for 2020-21



■ Concerns ■ Enquiries — Conversion rate

Appendix A: Detailed Safeguarding Adults Data

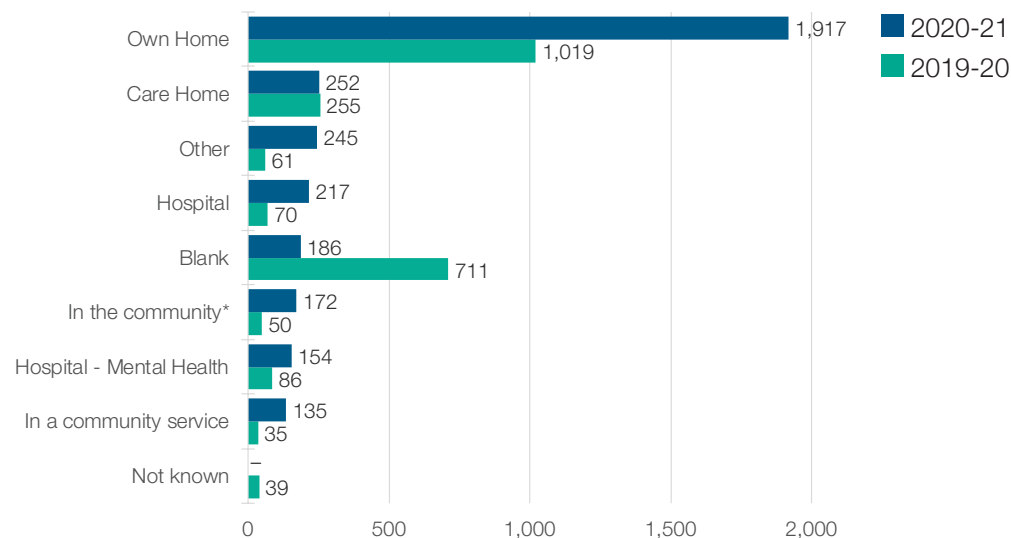
Type of Abuse in Concerns

Type of Abuse*	2020-21	2020-21 (% age)	2019-20 (% age)	2018-19 (% age)
Self-Neglect or Hoarding	790	20.3	17.3	18.8
Neglect and Acts of Omission	699	18	21.7	22.7
Physical Abuse	543	14	11.9	12.3
Emotional/Psychological Abuse	535	13.8	14	12.7
Domestic Abuse	441	11.3	5.7	5.6
Financial or Material Abuse	376	9.7	10.1	11.1
Organisational Abuse	144	3.7	6.9	7.7
Sexual Abuse or exploitation	144	3.7	3	2.5
Pressure Sores	134	3.4	8	5.5
Discriminatory Abuse	26	0.7	0.2	0.2
Modern Slavery or Human Trafficking	21	0.5	0.4	0.3
Hate Crime or Disability Hate Crime	19	0.5	0.6	0.5
Honour-based violence	10	0.3	0.1	0
Forced Marriage	5	0.1	0	0.1
Female Genital Mutilation	2	0.1	0	0

*There can be multiple forms of abuse so numbers do not add up to the number of concerns.

Location of Abuse

Location	2020-21		2019-20	
Own Home	1,917	58.5%	1,019	43.8%
Care Home	252	7.7%	255	11.0%
Other	245	7.5%	61	2.6%
Hospital	217	6.6%	70	3.0%
Blank	186	5.7%	711	30.6%
In the community	172	5.2%	50	2.1%
Hospital – Mental Health	154	4.7%	86	3.7%
In a community service*	135	4.1%	35	1.5%
Not known	-	-	39	1.7%
Grand Total	3,278	100%	2,326	100%



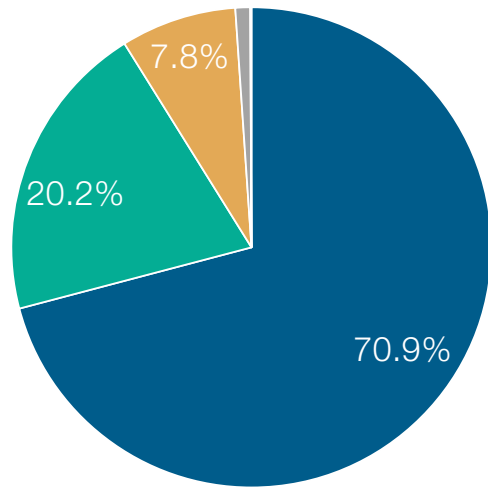
*Excluding community services

Appendix A: Detailed Safeguarding Adults Data

Risk outcomes for completed enquiries

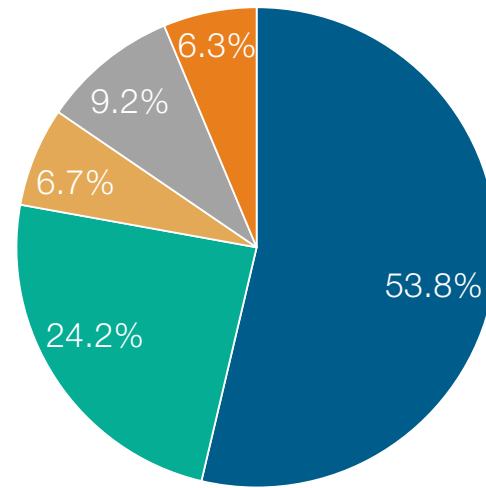
The charts below compares risk outcomes from previous years.

2020/21



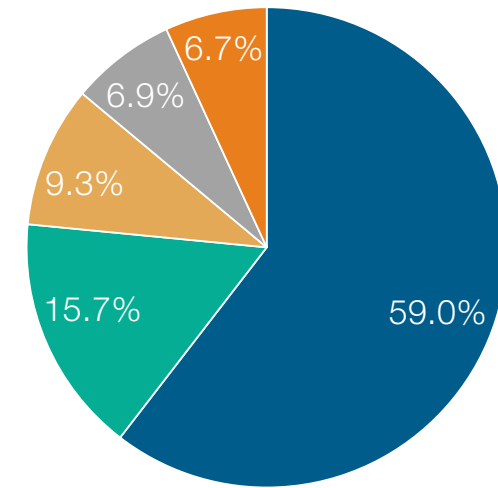
- Risk reduced
- Risk removed
- Risk remains
- Risk did not exist = 1.0%
- Not applicable = 0.1%

2019/20



- Risk reduced
- Risk removed
- Risk remains
- Risk did not exist
- Not applicable

2018/19



- Risk reduced
- Risk removed
- Risk remains
- Risk did not exist
- Not applicable

76.7% of respondents also felt safer after the enquiry had been completed. A further 17% felt partially safer (i.e. safer in some areas, but not others).

Appendix B: Detailed Children's safeguarding information

In this appendix we present more detailed information about safeguarding children and young people activity in Enfield. Included in the updates there is feedback from customers about their experiences. We've also included examples of excellent practice by an officer or team.

North Central London Clinical Commissioning Group, Enfield Directorate

Safeguarding Children

The Safeguarding Children Partnership in Enfield moved to virtual meetings in 2020/21. The Executive team met more frequently as the other sub group meetings were stepped down in the first two quarters. The CCG Designated Nurse represented the CCG along with the then Managing Director for Enfield. The executive responsibility now sits with the NCL CCG Director of Quality and Chief Nurse who attended for latter part of 2020/21.

One area of focus for the Partnership is data analysis and audit to assess multiagency work, in particular case conferences. It was noted the business support unit for the Partnership did not have sufficient children's experience to lead

on this area of work. Enfield Directorate agreed to increase the financial contribution in line with other NCL Directorates which has aided the development of this work.

The Designated Nurse and the Named GP undertook a piece of work on case conference requests and reports. This included tracking the request for information through to report submission. The Designated Nurse and Named GP had a series of practice visits after the initial restrictions were eased. The practice visits have been put on hold due to the pandemic. Some of the issues identified in the visits included NHS mail inadvertently marking the requests as Junk and the short timeframe for turnaround from requests to submission. In addition, there is inconsistency across the 5 boroughs on how GPs are supported with other CCG Directorates paying the GPs for their time to complete the reports. Results of the audit will be shared with the Exec team in June 2021.

The Designated Nurse for Safeguarding attends the Practice Improvement group which continued to meet on a regular basis in 2020/21. The Practice Improvement group is a joint safeguarding children and adult sub group which looks at areas to improve practice, learning from case reviews, including

Local Learning reviews and Safeguarding Adult reviews. Enfield Directorate commissioned a piece of work by an independent reviewer to look at recommendations from the various reviews, identify themes and develop a framework to support learning.

The CCG Designated Nurse represented the CCG at the national Serious Youth Violence summit in March 2021. Each of the three Ministerial departments were represented with the junior Ministers opening the event. There is a commitment to joint working to reduce the incidence of Serious Youth Violence. Enfield remains an area of concern and is the highest borough for incidents of Serious Youth Violence in London. The Designated Nurse attends the Oasis Youth Hadley steering group which supports a youth worker in A&E at the North Middlesex University Hospital. Support was offered virtually over the lockdown period with a notable decrease in the number of attendances to A&E.

There continues to be gaps in the Designated Doctor functions for Enfield. The interim post-holder is working at full capacity to ensure children who require Child Protection Medical Examinations and Adoption/Fostering medical examinations are seen. Therefore, the Designated Doctor for Looked After Children,

Appendix B: Detailed Children's safeguarding information

Safeguarding Children and Child Death are not being covered. The Designated Nurse for Safeguarding Children and the Designated Nurse for Looked After Children are working closely with the Safeguarding Children Partnership leads and the interim medical lead, however there continues to be an unmitigated risk. The interim medical has escalated the gaps to the Clinical Medical Lead for Enfield Community services at Barnet, Enfield and Haringey Mental Health Trust. The Trust is actively trying to recruit to the posts.

The Safeguarding Lead GP forum met on 3 occasions in 2020/21 via teams. There was an increase in GP practices represented at the forum with a plan to continue to offer a virtual platform for attendance. The focus of the sessions was on hidden harm, in particular Domestic Violence and Abuse. The Named GP for adults delivered a training session on Coercive Control and recognising the signs. The Designated Nurse for safeguarding discussed the learning from a Local Learning review on a case involving home schooling, with a focus on making every contact count. There was also a presentation from Rise Mutual on their work with perpetrators.

Examples of excellent practice by an officer or team

The Designated Nurse for Looked After Children provided exceptional support to her team and ensured children in care continued to have their health needs met. In spite of the lack of designated medical support, the Designated Nurse has worked with the Local Authority and other professionals to minimise the gaps in provision.

The Named GP for children provided front line support to NCUH A&E and Chase Farm Urgent Care during the pandemic. He worked tirelessly to treat patients at both departments. His attitude and approach to work supported numerous front line staff during this exceptionally difficult time.

Safeguarding focus during Pandemic

On the first of April, 2020 Enfield Clinical Commissioning Group (CCG) became part of the North Central London CCG. Each Directorate safeguarding lead worked collaboratively to develop a NCL wide safeguarding strategy, work plan and risk register. The CCG Designated Nurse continued to support the NCL Child Death Overview Process one day a week.

The CCG co-ordinated a webinar training session for primary care and provider leads on Domestic Violence and Abuse across NCL. There was also continued focus on the Identification and Referral to Improve safety project. During the pandemic, there was a notable decrease in the number of referrals to the service with the advocates providing virtual and telephone support. The advocates attended various forums to continue to highlight their offer of support and to offer tips on assessing risk using virtual assessments.

The NCL Designated Professionals have continued to monitor, and quality assure the NCL Safeguarding Health Providers Recovery and Restoration Plans for COVID-19. This has demonstrated that there is adequate assurance of the safeguarding elements of all health providers across NCL. Ongoing borough level safeguarding assurance in the delivery of provider's recovery and restoration plans is obtained through Designated attendance at providers safeguarding committees and at local partnership meetings. Where gaps are identified, further assurance has been sought and is monitored at a local level by the relevant borough Safeguarding Leads. There are no plans that required escalation.

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The provider safeguarding teams continued to provide a high level of safeguarding support during the pandemic. In spite of exceptional circumstances, teams at BEH, NMUH and the Royal Free NHS Trusts worked incredibly hard to ensure vulnerable children were identified and referred. There has been a notable increase in the number of children requiring additional support with their mental health needs and all three Trusts have responded swiftly to get the support in place.

Domestic Abuse – Police activity

Since the inception of the North Area, Basic Command Unit (BCU) Violence Against Women and Girls (VAWG) Plan in March lots of work has been undertaken across the BCU.

- **VAWG Strategy and Tactical Plan** – written in March and buy in secured across the BCU to ensure a collaborative approach.
- **Offender Management** – A key tactic in reducing risk was tackling offender management and targeting those high harm VAWG offenders. A bespoke system for VAWG offenders has been created and shared across the Metropolitan Police Service through the central weekly dial ins chaired by Commander Alison Heydari.

Since the introduction at the beginning of April we have seen a reduction of offenders wanted for VAWG offences.

- **Partnership Approach** – VAWG leads in Haringey and Enfield have been reached out too. The Policing Plan has been explained and input provided to both Local authorities at a strategic level including VAWG steering group and Strategic board. Scanning across both boroughs has been completed to identify charities and VAWG groups to reach out and encourage awareness and reporting to Police. There are almost 100 variations of different VAWG support groups with multiple service users across the BCU.
- **Training** – In May 2021, a cohort of Public Protection officers participated in 'Train the Trainer' knowledge exchange sessions through Enfield Council – focusing on VAWG and Stalking awareness where learning can be shared with fellow professionals from across public services and health.
- **National Stalking Awareness Week – 19-23 April 2021** – Daily stalking awareness sessions were delivered to front line officers by police, schools officers attended a number of schools to promote 'clever never goes' – formerly 'stranger danger' to promote practical personal safety skills for primary

school children without causing unnecessary fear or mistrust of strangers. The new message instead teaches children to recognise unsafe situations to reduce the risk of abduction, including by persons known to the child. A bespoke review of all outstanding stalking suspects and stalking protection orders were considered for each case. There was a central national newspaper/broadcast and social media campaign promoting the week and encouraging victims to come forward from the MPS stalking lead.

- **Intelligence** – A dedicated analyst has reviewed crime data for the previous three months of the open space hotspot data in Enfield and Haringey for offences and plotted these areas on a map – the patrolling units have been provided with this data as well as images of known offenders for sexual offences and vulnerable CSE children to ensure that robust action is taken against perpetrator's and safety measures put in place around victims.
- **Safeguarding sex workers and targeting offenders – Op Boxster** – A long-term, dedicated operation by SNT Taskforce with the responsibility of reducing offences involving sex workers, associated crime and ASB in and around N17 and N18 using

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covert and overt policing tactics. The team work with various internal and external partners along with agencies to employ an array of tactics and strategies to meet operational objectives. As well as targeting those individuals responsible for soliciting, the team also provide an intelligence capability to identify any persons who may be at risk but also known offenders.

- VAWG Day of action – 13 May 2021 –** Police in uniform and plain clothes from North Area completed various activities across the BCU to highlight how we are working hard to prevent violence against women and girls, bringing offenders to justice and supporting victims, as well as engaging about the subject in a variety of ways. We targeted wanted offenders, focusing on arrest enquiries and providing extra people and resources to do so. Reassurance patrols were increased in public spaces with officers and staff taking the opportunity to engage with communities about what we're doing. This also included transport hubs such as train and underground stations and bus terminals. One male targeted by officers had carried out a random attack on a lone woman earlier in the week. He was identified by an eagle-eyed neighbourhood officer and a man-hunt launched. Following a relentless

pursuit through the week he was arrested and convicted for the assault. He awaits sentencing.

Child Protection information and evaluation

Safeguarding Children

Total contacts into Children's Social Care:

	2018/19	2019/20	2020/21
Contacts	29,364	31,427	30,878

Though there was a small decline in 2020/21, the number of contacts into Children Social Care were higher than the 2018/19 levels. The decrease in the number of contacts during 2020/21 was a result of the various lockdowns and visibility of children and young people through the year. There was a decline in referrals to the Children's MASH following the initial lock down in March 2020. The trend was similar in January 2021 when there was another lockdown with contacts reducing significantly when schools were closed. The anticipated increase in the contact in March 2021 when schools reopened is reflected in the data. The number of contacts relating to domestic abuse or physical violence reflect a similar pattern decreasing during lockdown.

	2019/20	2020/21
Number of MASH Contacts	17,725	19,959

Partnership working in the Children's Multi-agency Safeguarding Hub (MASH) is strong. We launched a daily Emergency Duty Team (EDT)/MASH handover meeting which includes the police and health. This led to more robust and timely information sharing and smoother transitions with clarity on ownership and escalation. MASH Operational meetings with partners have continued to take place and they are an opportunity to enhance understanding of thresholds.

MASH threshold decision making has continued to be robust with ongoing audits reflecting good decision making. In April 2020, an audit of a dip sample of MASH cases found that threshold decision making in MASH was appropriate and proportionate. Ongoing work is being undertaken by the MASH manager to enhance practice.

Child and Family Assessments

Timeliness and quality of social work interventions remain good with over 90% assessments completed despite the challenges during the pandemic. This continues a year on year upward trend. Social workers have

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continued to work with children and seeking through views through direct work

Children Protection

Section 47 Strategy discussions/ meetings

	2018/19	2019/20	2020/21
Investigations	1,307	1,793	2,078

An increase in Section 47 strategy meetings was noted in 2020/21 (an increase from 1,793 to 2,078) which could be attributed to the pandemic as services in the community were limited and families were in crisis. 82.9% of the strategy meetings led to Initial Child Protection Conference which evidences good threshold decision making and that appropriate cases were escalated to Section 47 investigations.

Children subject to Child Protection plans

	2018/19	2019/20	2020/21
Children	296	203	257

The increase in the number of strategy meetings has also resulted in an increase in the number of children on Child Protection Plans in the second quarter of 2020/21 (as indicated above) due to the severity of incidents and

complexity of referrals received in Children's Social Care.

Service User feedback

In 2020/21, service user feedback was introduced across the Assessment and Intervention Teams and Child Protection and Child in Need Teams on all cases being audited. This process is being embedded and is now included in the audit moderation report.

72 service users were contacted for feedback, 45 participated. Of these 20 were children on Child Protection Plans while the rest related to children on Child in Need plans as well as those subject to child and family assessment.

Understanding

- 91.1% fully understood why social care had been involved, 4.4% mostly understood, 2.2% did not understand fully and 2.2% did not understand at all.

Respect

- 84.4% felt respected by social care workers (a lot), 8.9% quite a lot, 4.4% not a lot, 2.2% not sure.
- Two individuals who did not feel respected by social care workers had a child on a CP plan

Listening

- 73.3% felt they were listened to (a lot), 17.8% quite a lot, 4.4% not a lot, 2.2% not at all, 2.2% not sure.
- Of the three individuals who did not feel they were listened to, two had a child on a CP plan and one had a child on a CIN plan

Parental Involvement

- 73.3% felt involved with decisions that affected their child (a lot), 13.3% quite a lot, 2.2% not a lot, 4.4% did not feel involved with decisions that affected their child (not at all), 6.7% not sure.
- Of the three individuals who did not feel involved with decisions that affected their child, one had a CP plan and two had CIN plans.
- Of the three individuals who were not sure whether they felt involved, two had a child on a CIN plan and one had a child with an open referral.

Improvement

- 63% of individuals felt things had improved since social care's involvement.
- 18% of individuals felt things had remained the same since social care's improvement.

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- There were 3 families where parents did not feel the social worker made a difference for example social worker could not provide housing and in another the parents were in conflict and felt social worker sided with the other parent. Other reasons given were parents not being happy with the assessment if the outcome was not what they expected.

Joint Service For Disabled Children

The Joint Service for Disabled Children is comprised of the specialist social work service, preschool support home visiting service, early years keyworker service and a specialist short breaks and family support service.

Services are delivered in house 7 days per week at Cheviots, specialist play and home care providers are commissioned, and families can also access a personal budget to arrange the support that best meets their child and family's needs.

The services and support are designed to provide fun activities for the child, an opportunity to meet with their friends or be supported to access community activities and provide a break for the parent from their caring responsibilities to support family life.

Transforming Care

We increased the frequency of the multi-agency Dynamic risk register meetings to weekly to ensure that children and families most at risk were supported effectively and to ensure that there was communication across the professional network

Positive Behaviour Support (PBS)

All behaviors have a meaning.

Positive Behavior Support aims to understand what behaviours that challenge tell us, so that the child's needs can be met in better ways. The way the child is supported often has to change to achieve this and this needs to be regularly reviewed by all the people involved.

Positive Behaviour Support is an approach that puts the child at the centre to make systems work for them. We aim to give the right support at the right time so children can thrive to their potential.

The Joint Service now have 4 PBS Coaches and 9 Practitioners in the service.

PRICE training has replaced Approach as our provider of behaviour management and physical restraint training. When supporting people who are distressed there are times

when restrictive interventions are required to protect staff, the individual themselves, and others. We share PRICE training's commitment to restraint reduction and the use of person-centred, non-restrictive strategies to support children and young people with behaviours of concern. PRICE also incorporates important aspects of Trauma Informed Practice and Positive Behaviour Support.

New referrals to the JSDC of children 4yrs + for short breaks and family support:

- April 2017 – March 2018: 169
- April 2018 – March 2019: 180 (up 7%)
- April 2019 – March 2020: 234 (up 30%)
- April 2020 – March 2021: 150

The pandemic impacted on the number of new referrals received during the last year, please see data.

Requests for additional support:

- April 2017 – March 2018: 208
- April 2018 – March 2019: 295 (up 42%)
- April 2019 – March 2020: 260
- April 2020 – March 2021: 225

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Number of CWD in receipt of Short Breaks

Scheme	2017-18	2018-19	2019-20	2020-21
Short Break Grant	166	196	210	224
Direct payment	60	77	95	103
Directly commissioned Afterschool and Play scheme	114	117	112	89
Directly commissioned Homecare	77	57	75	61
Directly commissioned Residential	3	3	2	2
Shared Care	5	0	0	0
In-house Short Breaks including Family Fun Days	208	218	229	88
Temporary Pre-paid cards issued as alternative support during COVID (including some SBG/DP)	-	-	-	58
Total (not unique)	633	668	723	625
Unique	-	-	625	606

Impact of Positive Behaviour Support

- Improved understanding of behaviour and its functions
- Improved well-being for children and young people
 - Visibly happier
 - Engaging in more activities
 - Able to access the community
- Improved communication
 - Children provided with the right tools to support communication
 - Able to make choices
 - Build stringer relationships with staff
- Reduction in behaviours of concern including self-injurious behaviours and those that harm other children and staff
- Reduction in number of injuries caused by behaviours of concern
- Reduction in the use of restrictive practices to manage behaviour

Safeguarding focus during Pandemic

We know that the Covid pandemic been particularly challenging for disabled children and their families and the people that support them.

The sudden disruptions in routine, the withdrawal of support, the anxiety about safety have had such an immense impact.

For many families there has been financial insecurities and worry about the health and wellbeing other family members.

Families who rely on support networks whether from their family and friends or professional networks, have described their sense of isolation as this has been disrupted and, in some cases, has ended completely and due to the national lockdown and social distancing measures, the ability of children and families to access the usual range of traditional, face-to-face, social networks has been severely impacted.

For many disabled children and young people, the loss of their routine, structure, social relationships, school and short breaks that they rely on, has impacted negatively on their emotional wellbeing which has resulted in increased behaviours of concern.

We also know that families living in accommodation that does that not meet their needs, further exacerbated pressures for families with no access to outdoor space, impact of disrupted sleep patterns due to lack of routine, children sharing bedrooms

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with siblings which impacts on their wellbeing and often disrupts their home education programme.

We have utilised the newly formed Family Group Conference Hub in order to create support networks around children and families where there are safeguard concerns which has led to better outcomes, greater engagement with the Child protection processes and increased safety.

We are continuing to develop our child friendly and family friendly Child Protection plans taking into account the individual needs of the child and family.

We are continuing to explore creative ways of communication with disabled children extending and enhancing the range of direct work tools.

During the pandemic the Joint service has supported families with:

- emergency practical support e.g., finances, food, shopping, medical needs, prescription collections
- advice, support and signposting to other relevant services, e.g., finance, debt, furlough, mental health

- benefits applications, housing issues, charity applications, food bank vouchers
- emotional support and a chance for parents to talk when feeling isolated at home
- newsletters were sent from the service, giving families information regarding a variety of topics ranging from Covid-19 specific support, to ideas to keep children entertained, for example, online links to Makaton programmes and home activities.
- families who sadly had bereavements of close relations during lockdown were supported by their named worker as required.
- the families of children in hospital were supported and worked with multi-disciplinary medical staff to support planning for Covid-19 compliant discharges.
- all scheduled educational work continued remotely in the Early Intervention support service, statutory work in relation to EHCP needs assessment was completed within timescales, along with advice and guidance about home learning activities
- resource bags of activities linked to planned learning activities for preschool children were delivered to families as required with COVID-19 compliant 'doorstep drop-offs'

- the weekly multi-disciplinary complex needs group, 'Playing and Moving' was delivered live online from Cheviots using Microsoft Teams, with families attending the group invited to log on and participate in the early learning and physiotherapy activities with their child from home
- all new referrals to the joint service have continued to be accepted and allocated a
- work with schools was completed on target, with all schools contacted and transition planning undertaken virtually for children due to enter nursery in September 2020
- The JSDC funded picnics in the park for children with SEND and their families in partnership with SENDIASS as part of the summer offer.
- Managers attended webinars organised by Our Voice, including those relating to Short Breaks and Positive Behaviour Support to share information with parents.
- The Moving on Transition events have continued to take place virtually.

We recognise that lockdown and other restrictions and requirements associated with Covid-19 have led to an increase in behaviours of concern for some children

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and young people, and these have brought additional challenges for families. We have a team of Positive Behaviour Support Coaches and Practitioners at Cheviots and offered consultations with parents who would like some support managing these challenges.

Meetings were attended weekly with representatives of Our Voice with the Director of Education and Heads of Service in education, health, and social care to ensure that there was effective communication between the Local Authority and our parent forum.

In the summer we teamed up with Zebras Children and Adults Charity to provide fresh fruit and vegetables to approximately 40 families.

The Head of Service in the JSDC and the Head of Service in the Early Help and Protection Service presented to the SENCO forum to reinforce the referral pathways should they be concerned about the wellbeing, safety or support needs of any children.

We built on our well established positive relationships with the special schools to establish the children and young people who were not attending school, whether this was due to parental choice, because they or family members were shielding or because the school were not able to offer a place at school.

We worked with schools to assess the risks and consider together how these could be mitigated, balancing the risks and impact on the family, potential of family breakdown, need to safeguard staff and the child.

We increased the frequency of the multi-agency Dynamic risk register meetings to weekly to ensure that children and families most at risk were supported effectively and to ensure that there was communication across the professional network

The social work team continued to undertake statutory social work visits, reviews and assessments for children either virtually or face to face.

We increased the capacity of our social work duty service so we could ensure that parents queries were addressed, and appropriate referrals made for support and responded to quickly.

We established a daily meeting with our Team Managers and JSDC Short breaks Manager to review Covid specific requests for additional support from families to ensure timely decision making and delivery of support.

Short breaks provision

Many disabled children and young people were not able to adhere to social distancing so the

numbers of children that were able to use the Cheviots building at any session had to be limited, as the staffing levels are necessarily high due to the complexity of children's needs, this further limited the numbers able to be in the building at any one time.

Families in receipt of services from Cheviots short breaks team were all contacted by to ask if they would like their child to continue to access short breaks at the Centre.

We ensured that families where there were complex and multiple factors e.g. safeguarding concerns, number of children in the family with disabilities, parents health. Were able to continue to attend the sessions.

Where parents decided that they did not want their child to attend group sessions at cheviots, or where their child was required to shield or where we were unable to offer sessions, parents were offered an alternative short break.

Cheviots continued to be open for all after school and weekend groups and to run playschemes throughout.

Families who received a short break grant or another playscheme service that was funded by the Joint Service, were able to use the grant more flexibly to purchase play and leisure

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equipment for their child in place of their usual short break service including bikes, scooters, garden equipment, IT equipment, lego, sensory toys, trampolines.

Our commissioned playscheme providers operated when lockdown restrictions allowed but often with limited places.

In March the JSDC undertook a play and leisure survey to gather information about the activities that children and young people with SEND and their families wanted to access in Enfield. The survey was available online and in a variety of formats including symbols, pictures and easy read. We received 337 responses and have developed an action plan in partnership with our parent forums to increase access to play and leisure opportunities available.

Examples of excellent practice by an officer or team

During the Covid Pandemic the Short Breaks and Family Support Team have worked tirelessly to ensure that the most vulnerable children and young people with disabilities and their families have continued to access crucial short breaks. This has often meant placing themselves in positions of higher risk in the height of the pandemic by keeping

playscheme, after school and weekend sessions running as the alternative of having those vulnerable children and young people at home throughout the pandemic could have been incredibly harmful and damaging to the wellbeing of their entire families. The team have approached this with enthusiasm and dedication to the unified aim of putting children first and supporting families to lead happy and safe lives.

The short breaks team continue to deliver short breaks after school, on Saturdays and Sundays, and during all school holidays. They responded when children were unable to attend school and where families were feeling overwhelmed with either caring responsibilities during the pandemic.

They were a constant source of support, reassurance, and practical support to parents, they were flexible, could be relied on to work additional hours at short notice to respond to emergency situations and maintained the needs of the children at the heart of all they do.

Their skill in supporting the most vulnerable disabled children and young people can not be overstated and they face risks every day without hesitation.

Mrs Y (Mother of two teenage boys with Autism) had this to say about the impact the short breaks team had on her family:

"I could not recommend them more. They have been amazing for my boys. One of my boys had a really tough time during the pandemic and they have been amazing.

"Anne has been our guardian angel.

"We wouldn't have made it through the lockdowns if it wasn't for them. I always knew when the boys attended Cheviots, they were happy and safe, and it gave me a chance to do other important things I needed to do".

Max (Social Worker at Cheviots) had this to say about the work the short breaks team did during a crisis situation in the height of the second peak:

"I was in awe seeing the team attend the family home to contain the crisis that was unfolding. The police were present and the support of the short break team during that moment helped to reduce the level of anxiety of all those involved."

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The following comments were gathered from the lockdown survey performed by the Joint Service for Disabled Children:

"Just like to say the did everything, it was overwhelming the response I got and the help I got and am still getting, you don't realise how bad it was until you are through the other side, I lost my support network i.e. friends and family due to covid, but they became my network and I cannot thank them enough."

"Thank you we haven't always seen to eye to eye, but you have always had my daughters back and for that I am grateful. When we've needed support or provision that I could afford you have provided it. We see from our experience you provide an excellent working environment because the team that work around safeguarding my daughter who is especially difficult to safeguard has been outstanding for 8 years without a break."

"Mum would like to thank us for our excellent work. We are very friendly and helpful and ring her up to remind her that c is due at cheviots for his short break."

"We are so grateful they have always been there for us."

"Don't think they could have done anything more."

Within the Joint Service for Disabled Children we have tried to be as creative as possible to ensure that families are able to access the hugely valuable support of short breaks. During the Covid pandemic, there has been reduced access to almost all services and activities that children and disabilities would usually access.

The Short Breaks team have been pragmatic in their risk assessments which have identified those most in need of support during this time. There have been many instances similar to that which was experienced by Mrs Y detailed above, where parents and carers have contacted the service stating that their situations at home have become more challenging for a variety of reasons. The Short breaks team have listened to those parents and carers before advocating for them at resource allocation panels.

As you can see from the comments above, the experience of many service users and their families who have accessed additional and continued support from the short breaks team has been wonderful. It is incredibly powerful to hear that families feel they might not have managed during the lockdown were it not for the support provided by the short

breaks team. The Joint Service for Disabled Children prides itself in its commitment to ensure that disabled children and their families in the London Borough of Enfield are heard and treated with respect in every single contact with the council.

The Short Breaks team have been integral in the development of a creative and flexible way of delivering short breaks to children, young people and their families during the pandemic. With the reduction in available activities they have helped to develop a system whereby those alternative short breaks would be offered to those families where children may have been shielding.

We know that short breaks are a vital form of support for families, however, with the additional pressures and stresses of the pandemic to contend with, we are of the view that the short breaks team and their work with the most vulnerable children and young people, has prevented family breakdowns and reassured parents and carers that they are not alone.

Feedback from Seema Islam – Chair Our Voice Parent/Carer forum

"It has indeed been challenging in ways we could never have imagined. The shorts

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breaks team have really stepped up to the challenge and endeavoured to continue their support to families under difficult circumstances. With ever limited resources, covid restrictions and health issues from the team were no more immune than the rest of us, the service has offered flexibility in light of the inevitable reduced number of playscheme places they were able to run.

"This is been a lifeline for many families and for some the alternative arrangements have been welcome, but as you know, there have been families and CYP who felt unsupported.

"Given the unprecedented and extremely difficult circumstances, Our Voice had the opportunity to work with Cheviots right from the start in March 2020 and try to adapt and target the help they offered.

"Enfield is fortunate to have such a fabulously skilled, dedicated and passionate team, they not only embody the values and behaviours we expect to see in our staff teams but provide the crucial support families need to continue in their caring role to.

"They truly are unsung heroes during this pandemic!"

Quality Assuring semi-independent placements

As the semi-independent placements are not regulated under the Care Standards Act, there are no minimum standards for what constitutes a 'Good' quality provision. This is left to the local authority to determine through their own quality assurance processes.

Prior to any semi-independent placement being sought for a young person under 18, the Care Plan will have been approved by the Placement Panel, chaired by the Director of Children and Family Services. This decision is informed by the views of the IRO and the assessment of need of the allocated social worker.

Checks for any serious gang/exploitation activity in the area are made prior to proposing a potential placement.

Enfield has a robust quality assurance process in place for all the council's commissioned semi-independent providers.

All the provisions used by Enfield are subject to monitoring visits annually conducted by the Placement and Assessment Officer including unannounced visits. In 2020-21 the Quality Assurance process was improved further by increasing the visits to the provision and

although due to the pandemic this has been virtual, the timeliness of these visits were improved. All untendered provisions are now visited either in person or virtually before the young person moves in, references are sought from 2 other local authorities (where possible) and during visits, the Placement Officer is now asking for all staff to test the fire alarms and carbon monoxide alarms. All young people in semi-independent placements get a monitoring call from ARIS and this has now been RAG rated so we are able to prioritise the young people who are more vulnerable and are able to monitor their placement more.

In 2020-21, a full monitoring visit was conducted on 17 semi-independent Providers (tendered and non-tendered provisions), with one of them requiring a revisit due to concerns around staff not able to test the fire alarms. This provision was revisited again within one month and all staff had been trained to test the fire alarms.

Evidence that demonstrates impact:

In 2020-21, a survey was undertaken by the council's Consultation and Resident Engagement Services Team (CREST) which included sending questionnaires to Enfield's care leavers living in semi-independent accommodation. 24 care leavers responded to this survey with an overall satisfaction rating

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of 8.66 out of 10 and 96% of care leavers reporting that they feel safe in their placement.

Safeguarding focus during Pandemic

The pandemic has caused unprecedented challenges to both our care leavers and providers. Care leavers were worried about self-isolating in their own room and providers being worried about how to keep their staff and other young people safe should there be a Covid outbreak in one of their provisions.

A coronavirus support plan was put into place through the Council's Risk Register process.

This included the Access to Resources Integrated Service (ARIS) contacting every semi independent provider where an Enfield young person was placed, on a weekly basis, to go through a series of coronavirus related questions. This ensured a proactive approach to identifying any evolving issues and included questions on staffing levels, any examples of symptoms or diagnoses in staff or young people, compliance and PPE. ARIS provided hand sanitisers to providers who had been unable to source this for themselves.

The Leaving Care Risk Register identified the potential for care leavers in semi-independent provision to struggle and feel isolated in

lockdown. Mitigating factors were put into place including; increased contact from social workers and personal advisors, additional funding for telephone credits where necessary and ensuring every young person had their own TV.

Providers were asked to purchase additional food and essential supplies, funded by the council, to ensure that any young person who ran out of provision could be given the necessary support. Every provider was written to asking them to discuss with their residents, any additional equipment they would like to help keep them occupied at home and the service purchased books, garden sports equipment, board games etc in response.

The Health and Education Access and Resources Team (HEART) continued to provide services to looked after children and care leavers throughout this period and specialist CAMHS appointments were delivered by virtually. The Virtual School ran its annual Summer ESOL course for Unaccompanied Asylum-Seeking Children using virtual technology. An Education, Employment and Training support worker was appointed to help some of the more complex young people to make the transition into meaningful activity.

Additional services were put into place across Children's Services to support young people, including those in semi-independent provision, through the challenges of lockdown. These included the online mental health support line, KOOTH, a Domestic Violence Hub and the Summer University Programme delivered through the Youth Service.

Examples of excellent practice by an officer or team

ARIS provided a 24 hour/7 day a week helpline throughout the first lockdown to providers to respond to any coronavirus related problems, questions or concerns. This required all officers within ARIS to be available throughout the night and the weekend to respond to any crisis that a Provider may have due to the Pandemic. The staff in ARIS undertook this without any issues and went the extra mile to help all the Providers.

Appendix C: Terms of Reference for Activity Groups

Insights Activity Group Terms of Reference

Chair: D.Supt Sebastian Adjei-Addoh

Support/Note Taking: Police

Meeting Frequency: The meeting will take place quarterly

Quoracy: Meetings must include representatives from the North Area Metropolitan Police Service, NHS North Central London CCG, and the Local Authority Children's and Adults Social Care to be quorate.

Meetings will be accessible and enable participation remotely.

Insights Activity Group Purpose

The Insights Activity Group is responsible for developing horizon scanning intelligence to identify current and future risks to the effectiveness of the Safeguarding Children Partnership arrangements.

This Activity Group will develop analysis products to enable the Safeguarding Children Partnership to meet the Working Together 2018 (WT2018) requirement to:

“Support and enable local organisations and agencies to work together in a system where there is early identification and analysis of new safeguarding issues and emerging threats” (part of WT2018, page 73, Paragraph 8)

The Safeguarding Partners (London Borough of Enfield (LBE), North Area BCU – Metropolitan Police Service, and the NHS North Central London Clinical Commissioning Group (CCG) and relevant agencies as identified by the New Arrangements for Safeguarding Children in Enfield, (including schools, NHS trusts and 3rd sector organisations) may be asked to share client level data, where vulnerabilities exist, and emerging threats require new responses.

A fuller picture of vulnerability will influence the activity of the Local Authority Units from Adult safeguarding, Children Social Care, Housing etc. as well as Health partners, and Police teams such as Safeguarding Hubs, Local intelligence Team and neighborhood teams. This will result in a more directed tailored intervention, thus avoiding duplication and greater management of risk by the most appropriate team.

It is important that the Local Intelligence manager and the safeguarding partnership must be able to agree on the collection,

development and dissemination of intelligence to allow decisions to be made about priorities and tactical options.

Governance

The Insights Activity Group reports to the Enfield Safeguarding Children Partnership Executive Group and the Safeguarding Adults Board.

Two key points will be shared with the Executive and other groups, which show how the meeting has helped to safeguard children and young people. Updates will be provided at the Safeguarding Adults Board.

Members are responsible for ensuring any actions agreed by the Insights Activity Group are effectively carried out within their agencies and will report back information discussed at the meetings.

Nominated members are expected to attend all meetings. Where this is not possible, this must be communicated to the Chair or Safeguarding Enfield Business Unit in advance, and reasons given and a substitute identified.

Core Membership

- Police (North Area BCU)
- Enfield Strategic Safeguarding Adults Service

Appendix C: Terms of Reference for Activity Groups

- Enfield Children's Social Care
- Enfield Information Governance Manager or DPO
- Enfield Community Safety
- NHS NCL CCG – Enfield Directorate
- Enfield Knowledge and Insights Team
- Public Health (from Adults and Children's)
- Enfield Children and Young People's Service (3rd sector)
- Modern Slavery Team
- NHS BEH Mental Health Trust

Individuals can be co-opted on to groups deemed necessary and as agreed by the chair.

Areas of analysis for 2021/22

The main areas of focus for the 2021/22 financial year are detailed below:

- Domestic abuse figures, further analysis with ethnicity breakdowns, correlations to child MH and exploitation.
- Ethnicity analysis to understand which communities may not be engaging with services
- Hate crime
- Financial abuse

Purpose of any analysis proposed

The purpose of the analysis is not to provide or assure individual case level practice, but to

provide a strategic view of the emerging issues or threats. The group will view aggregated data, however the source of and numbers involved may make individuals identifiable. In addition, the sharing of data will need to be at a client level so that links can be made to develop a comprehensive multi-agency picture, so that we understand the risks to a specified group of vulnerable individuals.

A fuller picture will:

- focus not only on priorities but also on other key threats identified in the intelligence gathering.
- allow needs to be continually reviewed and updated
- identify gaps and how those gaps can be filled e.g. digital intelligence strategy etc.

Responsibilities

London Borough of Enfield (LBE)

- LBE will identify subjects that require an improvement in intelligence and information,
- Provide information to allow analysts to form a picture of vulnerability and risks.

Health partners

- Provide information to allow analysts to form a picture of vulnerability and risks.

- Provide advice, guidance and direction on individuals suitable for health intervention

Basic Command Unit (BCU) Intelligence team

- Enfield and Haringey Police merged in 2019 to become the North Area Basic Command Unit (BCU).
- Provide information to allow analysts to form a picture of vulnerability and risks.
- BCU should run intelligence checks to capture individual subjects at risk of exploitation.
- Analytical and research support will be provided by BCU intelligence staff.

What is the legal basis for sharing these datasets and undertaking this analysis?

For Councils and the NHS the powers to share datasets come as follows:

For all data, Article 6 reason

The Data Protection Act 2018 (DPA) section 8(c) – “the exercise of a function conferred on a person by an enactment or rule of law”, specifically the National Health Service Act 2006 and the Health and Social Care Act 2012. This allows the legal basis of: UK GDPR Article

Appendix C: Terms of Reference for Activity Groups

6(1)(e) ‘...for the performance of a task carried out in the public interest or in the exercise of official authority...’

For Special Category Data, Article 9 Reason

The DPA section 10 (1) (b) satisfying DPA s.10(3) via Schedule 1 Part 2 section 10 “Preventing or detecting unlawful acts”; and, Schedule 1 Part 2 section 18

“Safeguarding of children and of individuals at risk”, permitting the legal basis of:

UK GDPR Article 9(2)(g) “processing is necessary for reasons of substantial public interest, on the basis of domestic law which shall be proportionate to the aim pursued, respect the essence of the right to data protection and provide for suitable and specific measures to safeguard the fundamental rights and the interests of the data subject;”

The DPA section 10 (1) (c) – “Health or social care purposes” satisfying DPA section 10 (2) via Schedule 1 Part 1 section 2 permitting the legal basis of: UK GDPR Article 9(2)(h) ‘... medical diagnosis, the provision of health or social care or treatment or the management of health or social care systems...’

For the police, and other organisations who might be asked to share information on occasion (such as schools, community or voluntary organisations) the powers to share data come as follows:

Lawful basis for sharing information

The sharing of information must comply with the law relating to confidentiality, data protection and human rights. Most specifically it must comply with the following legislation.

- Data Protection Act 2018
- General Data Protection Regulation 2016 (GDPR)
- Human Rights Act 1998 (HRA)
- Common law duty of confidentiality
- Confidentiality and Sharing for Direct Care

Having a legitimate purpose for sharing information is an important part of meeting those legal requirements. It is also important only to share as much information as is needed for the stated purpose. What is shared must be accurate, relevant and up to date, and records must be kept of what information is shared and with whom.

This is a complex area and each Partner must take their own decisions and seek advice from their organisation’s Data Protection Officer and/or Caldicott Guardian.

Under GDPR, a data controller must have a lawful basis under Article 6 for processing personal data, and from Article 9 for processing special category data. For work relating to safeguarding children the following lawful bases will be the most common:

Article 6 (1)

(c) processing is necessary for compliance with a **legal obligation** to which the controller is subject

Article 9 (2)

(g) substantial public interest – processing is necessary for reasons of substantial public interest, on the basis of Union or Member State law which shall be proportionate to the aim pursued, respect the essence of the right to data protection and provide for suitable and specific measures to safeguard the fundamental rights and the interests of the data subject

Article 6 (1)

(e) processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller

Appendix C: Terms of Reference for Activity Groups

Article 9 (2)

Article 9 (2)

(h) provision of health or social care – processing is necessary for the purposes of preventive or occupational medicine, for the assessment of the working capacity of the employee, medical diagnosis, the provision of health or social care or treatment or the management of health or social care systems and services

(i) public health – processing is necessary for reasons of public interest in the area of public health, such as protecting against serious cross-border threats to health or ensuring high standards of quality and safety of health care and of medicinal products or medical devices, on the basis of Union or Member State law which provides for suitable and specific measures to safeguard the rights and freedoms of the data subject, in particular professional secrecy

The processing of criminal data meets conditions of legal obligation and public task in Article 6 as above, and additionally meets requirements set out in Article 10 GDPR and Schedule 1 of the Data Protection Act 2018.

The Children Act 1989 is the main legal obligation for the work of undertaken by the Partnership.

The Children Act 1989, Section 47, places obligations on the local authority and other public agencies to investigate any allegations where a child is suffering or is likely to suffer significant harm. Section 17 of the same Act places a duty on the local authority to safeguard and promote the welfare of children within their area who are in need.

Some concerns regarding children where information will need to be shared under this workstream will fall below a statutory threshold of Section 47 or even Section 17 Children Act 1989.

Sections 10 and 11 of the Children Act 2004 place obligations upon local authorities, police, clinical commission groups (CCG) and the NHS Commissioning Board to co-operate with other relevant partners in promoting the welfare of children and also ensuring that their obligations to safeguard and promote the welfare of children are met.

In addition to the above, some Acts of Parliament do give statutory public bodies express or implied statutory powers to share information.

There are a number of pieces of legislation. Some of these are relevant to all members of the BSCP, others relate to specific organisations. These are part of the full Terms of Reference and available on request.

Appendix C: Terms of Reference for Activity Groups

Practice Improvement Activity Group Terms of Reference

Chair: Jon Newton, Head of Older People and Physical Disabilities Services, Enfield Council

Meeting Frequency: The meeting will take place six weekly. Meetings will be accessible and enable participation remotely.

Quoracy and attendance: To be quorate meetings must include representatives from:

- Metropolitan Police Service North Area;
- NHS North Central London CCG;
- Local Authority Children's Social Care; and
- Adults Social Care

Where quoracy is not achieved, the meeting will continue but decisions will not be made unless the lead agencies (for adults – Local Authority ASC; for children's – Local Authority CSC, Police and NCL CCG) are present.

Nominated members are expected to attend all meetings. Where this is not possible, this must be communicated to the Chair in advance, reasons given and a substitute identified.

The Chair has the ability to initiate Task and Finish Groups, or sub-groups, as necessary to achieve the purpose of the activity group. The Chair must highlight any changes to the Safeguarding Adults Board or Safeguarding Children's Partnership Executive group, via the Business Unit.

The focus of the group, sub-groups and task and finish groups will be reviewed annually.

Purpose

The Practice Improvement Activity Group, will lead on:

- i) Safeguarding Adults Reviews (which the Safeguarding Adults Board has a legal duty to undertake) ensuring that these are completed in line with Care Act requirements, and that lessons can be learned together.
- ii) the work of overseeing local child safeguarding practice reviews, learning from national reviews, and translating these findings into system improvements, which can include updating policies and organising training.
- iii) The group will also be responsible for initiating children's multi-agency audits

to make sure that learning has been embedded and ensure the effectiveness of existing policies or practices.

- iv) Ensuring that policies and protocols for Adults and Child safeguarding are up-to-date and that they are reviewed regularly.
- v) For Child Safeguarding cases, provide oversight for cases that are escalated to the Practice Improvement Group, and noting cases that may have been escalated to the Exec.

The Safeguarding Practice Improvement Activity Group will work closely with the Insights Activity Group to highlight areas that need to be monitored, or to provide intelligence that might need testing.

Governance

The Practice Improvement Activity Group reports to the Safeguarding Adults Board and Local Safeguarding Children's Partnership Executive group.

Members are responsible for ensuring any actions are effectively carried out within their areas and will report back to their teams any relevant information discussed at the meetings.

Appendix C: Terms of Reference for Activity Groups

Core Membership

- NHS NCL CCG – Enfield Directorate
- NHS BEH Mental Health Trust
- NHS North Middlesex University Hospital
- NHS Royal Free London
- Police (North Area BCU)
- Enfield Council, Adults Safeguarding, including Principle Social Worker
- Enfield Council, Children’s Social Care, including Principle Social Worker
- Enfield Council, Education department
- Enfield Council, Community Safety/ Domestic Violence officer
- Enfield Council, Public Health (from Adults and Children’s)
- National Probation Service
- Schools representative
- Lay person

Individuals can be co-opted into meetings when deemed necessary and as agreed by the chair.

Child Safeguarding Reviews and Serious incidents

The Chair of the Practice Improvement group will also Chair Rapid Review meetings that are required following a Serious Incident.

Due to the urgent nature of booking these meetings a Deputy chair has been identified – Sharon Burgess, Head of Strategic Safeguarding Adults and Partnerships.

The Serious Incident and Rapid Review process documents the steps that must be taken when the local authority makes a referral to the National panel.

Safeguarding Adults Reviews

Following SAR referral meetings, the Enfield Strategic Safeguarding Adults team will ensure that an update to the Practice Improvement group is presented, including the decision.

The SAR referral meetings and review steps are detailed in the Enfield SAR protocol.

Review

These Terms of Reference will be reviewed annually and as necessary.

Appendix C: Terms of Reference for Activity Groups

Vulnerable Young People's Activity Group Terms of Reference

1. Background

The Vulnerable Young People sub-committee (VYP) combines oversight of Enfield's response to Missing Children, those subject to Sexual Exploitation, Criminal Exploitation, children privately fostered, Trafficking, Modern Slavery, FGM, and children involved with gangs or other harmful practices and those young people who are aged between 16-18 and are victims of Domestic Abuse.

It is recognised that a number of specific groups focus on different elements of this work.

The role of the VYP is to maintain a strategic overview of the work of these groups and constructively challenge quality of services and timely delivery of objectives.

2. Key functions of the subcommittee

2.1 The sub-committee will maintain close working relationships with other groups, share information and provide constructive challenge to quality and timeliness of

actions to improve the response to VYP across the borough.

2.2 It will identify gaps in commissioning and make recommendations to Enfield Safeguarding Children Partnership (ESCP) accordingly, commissioning specialist training via the joint ESCP/SAB Practice Improvement (PI) sub-group.

2.3 Maintain and disseminate a good understanding of National and Regional and local policies and practices with regard to young people and contribute to the developments of the new procedures and protocols where required.

2.4 The VYP sub-committee will drive the SAFE workplan and agree new actions in support of other safeguarding strategies.

2.5 To support to the communication strategy of the ESCP for dissemination of information.

2.6 To support the Chair/ Deputy Chair to periodically deliver specific tasks through time limited "task and finish" groups.

3. Governance

3.1. The Vulnerable Young People subcommittee reports to the ESCP and

may also provide reports upon request to other groups including Enfield Safer and Stronger Communities Board (SSCB) and Health and Wellbeing Board (HWBB)

3.2. Members are responsible for ensuring any actions agreed by VYP are effectively carried out within their agencies and will report back information discussed at the meetings.

3.3. Nominated members are expected to attend all meetings. Where this is not possible, this must be communicated to the Chair or ESCB Business Manager in advance, and reasons given and a substitute identified.

4. Core Membership

- Enfield Community Safety Unit – Andrea Clemons (Chair)
- Enfield Children's Social Care – Florah Shiringo
- Enfield CCG – Christina Keating
- Enfield Children and Young People's Service
- Enfield Youth and Family Support Service
- Enfield School Improvement Service
- Police (Borough) – Paul Ridley
- Probation (NPS & CRC) – Kathryn Hunt
- Public Health – Dudu Sher-Arami

Appendix C: Terms of Reference for Activity Groups

- BEH Mental Health Trust – Carolyn Sobers
- The Royal Free London NHS Foundation Trust
- North Middlesex University Hospital Trust
- Modern Slavery Team – Fiana Centala
- Rescue and Response
- Lead Cabinet Member as an observer

4.1 Members must have strategic oversight and understanding of performance in their agency.

4.2 Individuals can be co-opted on to the group as deemed necessary as agreed by the chair.

5. Practicalities

Chair: Head of Community Safety

Deputy Chair: TBA

Meeting Frequency: The meeting will take place quarterly and meetings will be set annually in advance.

Review: The Terms of Reference will be reviewed annually.

Appendix D: Partner Updates

Barnet, Enfield and Haringey Mental Health NHS Trust

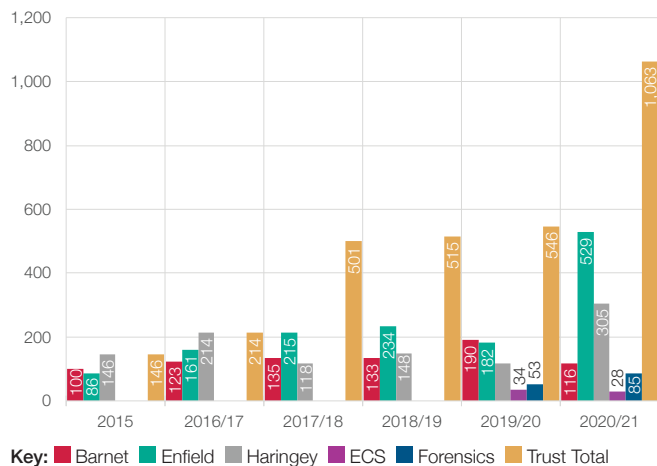
Safeguarding Enfield Annual Report information for 2020/21

Safeguarding Adults

Safeguarding Adult activity

The chart bellows shows a six-year comparison of safeguarding adult concerns raised. The number of concerns raised has increased significantly in 2020-2021 with reported concerns up by 92%. This is consistent with national safeguarding, whereby it has been reported that there is an increase in reports of abuse after lockdowns lift.

Six-year comparison of the number of safeguarding adult concerns raised by BEH staff

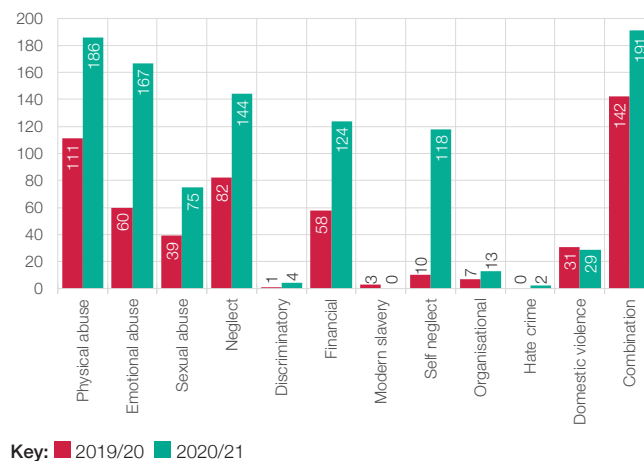


The table below gives further analysis of the trends in safeguarding adult referrals.

Year	Enfield	Trust wide annual total	Trend
2015	86	332	—
2016/17	161*	498 (50%)	▲
2017/18	215*	501 (1%)	↔
2018/19	234*	515 (2%)	▲
2019/20	186	546 (6%)	▲
2020/21	547	1,053 (92%)	▲

Please note: percentages in brackets = increase on previous year
*Includes ECS

Comparison in Adult Categories of abuse from 2019/20-2020/21



Safeguarding Adult referrals have increased for the 6th year running, and significantly so in 2020-2021 with a 92% increase in safeguarding adult concerns.

As indicated in the above chart, The most frequently raised categories of abuse physical abuse, financial abuse, psychological/emotional abuse and neglect or self-neglect.

There has been the most striking increase in abuse for the category of self neglect with a 1,000% increase in referrals. The Safeguarding team have created a trust toolkit for self-neglect, a quick grab guide and a lunch and learn session focussed on cuckooing (considered under the category of self neglect) have been put into place to help support staff. In addition team managers have been asked to ensure that their clients at risk of self neglect have additional monitoring and local authorities have created high risk and multi-agency panels in an attempt to manage the increase in self neglect and the associated risks such as environmental neglect, hoarding, fire risk, pressure ulcers etc.

The safeguarding Adults national network, along with SAB's and national government have noted that domestic abuse has increased significantly in the lockdowns during the

Appendix D: Partner Updates

Covid-19 global pandemic. Although our figures show there has not been an increase in domestic abuse, it is important to note that the majority of our domestic abuse reporting is under the categories of Physical, psychological and combination abuse, which has increased by over 100% in the last year. Our response to this increase is to support staff with their responses in the following ways:

- Providing resource packs for domestic abuse; some of which were specially created to work with DA during the pandemic.
- Increased training in domestic abuse provided by our IDVA services.
- Comms awareness and support campaigns including material and toolkits on safety planning, MARAC and responses to domestic abuse.

Psychological abuse safeguarding referrals have represented the biggest increase in referrals during the pandemic; Our trust have seen a significant increase in the reporting of Physical, emotional and combination of abuse. These forms of abuse have increased in the community but more significantly on the wards. Acuity on the wards during the initial lockdowns increased along with reporting of sexual abuse and physical harm. The adult safeguarding lead has worked with ward management to

implement preventative measures in the areas of physical violence and improved response to sexual abuse.

Concerns regarding the newer categories of abuse as defined by the Care Act (2014), such as modern slavery/human trafficking/ domestic servitude and hate crime are still less frequently raised. They remain low, however, we have seen a slight increase in 2020-2021. The Safeguarding team have implemented modern slavery training to the Champions and team managers in the trust in an attempt to raise awareness and see if this generates more activity. It is however acknowledged that these issues are less common in secondary services.

Concerns regarding financial abuse and scams has increased by 110%. This increase was predicated nationally during the pandemic and relevant partners have been working together; such as police, local authorities and fraud teams to address concerns and raise awareness.

There has been an increase in referrals for pressure ulcers from Community Nursing Services in Enfield especially in the categories of neglect (mainly pressure ulcers). There is work planned for supporting district nursing with safeguarding relating to pressure ulcers

and ensuring that they are managing under the appropriate frameworks.

Data collection has been a focus of this year with the adult safeguarding lead meeting with the local authority to discuss more effective data collection.

Section 42 Enquiries

Section 42 conversion rate	Q1 & Q2	Q3	Q4
Enfield	10%	65%	40%

We continue to collect data regarding the number of safeguarding adult cases that meet the Section 42 (2) Enquiry threshold. In the last two quarters, S42 enquires have increased significantly in Enfield, with a conversion rate of approximately 50% overall. There may be different reasons for this. In mid-2020, the local authority in Enfield spent a lot of time encouraging SAMs to think about if, the fact-finding work they had done did, in fact, fit the criteria of an enquiry. Due to Lockdowns, concerns received came through less consistently. Along with this, there is anecdotal reports from the local authorities and SAB's that the nature of Safeguarding concerns have increased in complexity and therefore require Section 42 enquiries more often.

Appendix D: Partner Updates

Safeguarding Children

Safeguarding children activity

There has been a slight decrease in referrals for Children’s safeguarding in the year 2020/21. Referrals dropped whilst children were kept at home from schools and other services that serve as the most consistent referrers for children’s safeguarding. It was noted that as children and young people returned to school there was a significant increase in referrals and the nature of the referrals more complex and entrenched within complex family dynamics.

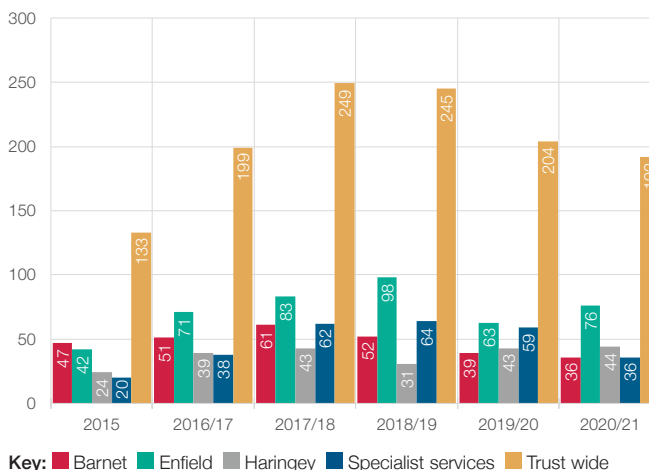
Year	Enfield	Trust wide annual total	Trend
2015/16	42	133	–
2016/17	71*	199 (19%)	▲
2017/18	83*	249 (25%)	▲
2018/19	98*	245	↔
2019/20	89**	204	▼
2020/21	76	192	▼

Please note: percentages in brackets = increase on previous year

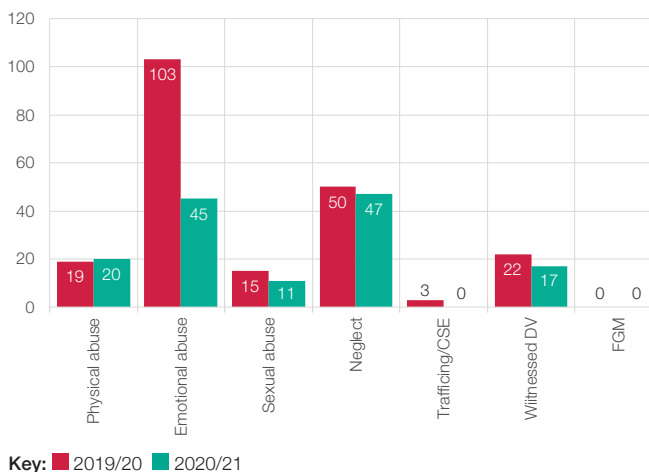
*includes ECS

**includes 26 from ECS

Total number of safeguarding children referrals



Comparison of Categories in Children’s safeguarding 2019/20-2020/21



The graph above shows the number of safeguarding children referrals made by type during 2020-21. This year we see a plateau in the amount of referral being made for children who witness domestic abuse. This may be hidden harm as less reporting is wider acknowledged during lockdowns. The number of referrals for children who are witnessing domestic abuse (22 referrals in 2019-20 compared to 17 during 2020-21). Early help and emotional abuse remain most common categories for the safeguarding referrals submitted for children with no change in the remaining categories, namely Female Genital Mutilation (FGM) where the safeguarding referrals remain 0 which is common for non acute trust for this to be very low. Reports of emotional abuse have halved during 2020-21 questioning whether this area of harm is hidden and will be reported as more services open and children and young people are accessing services.

In comparison with the previous two years there is a noted decrease in the number of referrals submitted across Enfield.

Since March 2020 the decrease in the number of safeguarding referrals made for children is a national picture and has been noted across all local authorities. This is due to the COVID-19 pandemic, that caused a locked down and resulted in fundamental changes to the lives of

Appendix D: Partner Updates

children and young people across the United Kingdom. This has meant that the agencies that would usually have ‘eyes’ on our children no longer did resulting in ‘hidden harm’. Our Trust was effective in responding to this change by implementing virtual consultation’. Despite this new type of contact, children were not being seen in the traditional way. With the return to a new normal it is anticipated that safeguarding referrals for children will return to pre-COVID levels.

Examples of excellent practice by an officer or team

Jo Toose in Enfield assessment team (BEH MH trust) team has been instrumental in the trust in managing/screening and supporting staff to implement protection plans. Her placement in the Enfield assessment team in mental health has improved safeguarding responses and supported trust staff.

Safeguarding focus during Pandemic

- Increase in online training
- Tailor online training to the areas of increased abuse or hidden harm (cuckooing, neglect, financial abuse)
- Increased COMMS and toolkits shared.

- Increase in the amount of safeguarding champions in each team.
- Meeting with teams to promote areas of abuse that require preventative work e.g. teams making lists of those vulnerable to self neglect and implementing additional monitoring measures.
- Sexual safety measure on wards including the following increase in Sexual abuse during lockdowns and subsequent reduction in S17 leave:
 - A3 posters for wards – (for staff and patients to raise awareness)
 - Sexual safety Booklets
 - Quick grab guide
 - Temperature check postcards for wards.

Preventative work ongoing look at effective risk management strategies to reduce incidents of sexual abuse on the wards – white board meeting – standing item on the daily agenda. i.e. daily checks of how safe a patient feels. Practical tips for ward staff – i.e. staff awareness of blind spots, environmental management. Practical tips for risk management of individual patients (e.g. if someone if very sexually disinhibited as part of their illness, what measures are staff putting in place to mitigate risks).

Themes emerging in lockdown 2020/2021

Lower numbers of safeguarding are reported during the peak of the lockdowns in the community and then a sharp rise in safeguarding referrals when lockdowns are lifted has been noted. The acuity on the wards does increase during lockdown periods where S17 leave is more limited. In line with national trends, Domestic abuse, self neglect, neglect and financial abuse has increased significantly.

There is evidence that there is more “hidden harm” during lockdowns, including grooming on the internet – (radicalisation, sexual abuse). This is evident from more PREVENT referrals from the trust along with more reports of online financial scams. Police report that Cuckooing has increased during lockdowns – staff have had access to Camden and Islington lunch and learn on cuckooing and audits on the response to Cuckooing safeguarding’s have been completed along with promotion of the relevant forums to manage risk. An increase in allegations against staff (especially bank staff) has been noted. This may be because the trust has appointed a PIPOT lead who is collating data within the safeguarding team.

Appendix D: Partner Updates

Community Safety Unit

Safeguarding Enfield Annual Report information for 2020/21

The Community Safety Partnership known locally as the Safer and Stronger Communities board have refreshed their partnership plan.

There is continued focus on tackling violence and burglary but additionally renewed efforts in reducing the harms caused by the supply and use of illegal drugs. This area is a key driver for crime and can manifest in ways such as county lines, cuckooing vulnerable people's addresses and increased violence and acquisitive crime.

We continue to work with the Mayor's Office for Policing and Crime and have submitted request for funding allocations to support our local priorities and those for London.

The SSCB is seeking to develop and refine offender management practices for both adults and young people to try to ensure the best outcomes for offenders and to reduce the numbers of victims of crime.

Public Health colleagues have worked in partnership with us to draft an evidence-based approach to tackling serious youth violence and our North Area Violence Reduction Plan has received favourable comment from the

GLA Violence Reduction Unit.

Covid 19 and the resulting restrictions have impacted on levels of crime in different ways with some reducing dramatically and others including Domestic Abuse and Anti Social Behaviour resulting in greatly increased demand.

Children's Services have created a Domestic Abuse Hub, where multi skilled teams from across the council provide support for victims of domestic abuse, irrespective of whether they have dependent children.

Hate crime incidents, linked with racist offences have also increased and we monitor crime patterns and individual cases to bring about improvements, highlight risks and support individuals.

Safeguarding focus during Pandemic

See above example of DA Hub.

CCTV operatives have acted in support of the police and public health to identify areas where Covid restrictions are breached to enable a targeted response.

Many interventions have moved on line to support young people who are vulnerable to exploitation by street gangs, although outreach has continued where allowed.

Worked with the police and partners to identify changing crime types and associated risks.

Worked with Safeguarding Adults Team to provide additional security for older vulnerable residents in addition to our locks and bolts service to give those at risk from crime greater security and peace of mind.

Enfield Carers Centre

Safeguarding Enfield Annual Report information for 2020/21

Safeguarding Adults

Enfield Carers Centre's entire office, homecare and support team also received Modern Slavery awareness training from the LBE MASH Team.

Safeguarding Children

1. Our newly employed Young Carers Worker attended online 'Child Protection' training delivered by the NSPCC.
2. The Young Carers Project Manager attended: 'Virtual Working and Safeguarding Considerations' training delivered by Education Child Protection and 'Jack Petchey Digital Training for Youth Groups' training delivered by Third Sector Lab.

Appendix D: Partner Updates

3. Another Young Carers Worker attended 'Domestic Abuse and Sexual Violence Awareness' online training delivered by Barnet Council.

Enfield Carers Centre (ECC) also refreshed its whole staff team's safeguarding knowledge via online training just before the onset of Covid.

ECC has also introduced a Safer Recruitment Policy. This involves:

- Including the Organisation's Safeguarding Statement in any job advertisements
- Requiring all applicants to complete an application form requesting identifying details; a national insurance number; a full chronological career history since leaving secondary education; any relevant or required qualifications; a personal declaration and details of two referees one of whom must be their most recent employer
- Providing a job description and person specification that includes the organisation's Child and Adult Safeguarding Statement.
- Ensuring all relevant documents also clearly state that all applicants must be willing to undergo Adult and Child protections screening relevant to the post, including

checks with past employers and the disclosure and barring service.

- Asking candidates appropriate questions at interview relating both to their skills and reasons for wanting to work with children and/or vulnerable adults.
- Ensuring that at least one member of the interview panel has undergone 'Safer Recruitment Training' within the past three years.
- Checking all candidates ID and exploring any gaps in their employment history or anomalies on the application form.

Safeguarding focus during Pandemic

Our charity noticed an increase in the number of concerns raised by both vulnerable adults and children during the pandemic as carers were "locked in" with their cared for persons with dementia and those with challenging behaviour etc.

ECC has made over four thousand "welfare/check-in" calls so far to:

- a) adult carers we were already aware of who were in precarious/challenging situations
- b) over 1,000 registered dementia carers
- c) all carers aged 65+

In addition ECC's EyPIC Young Carers Project Workers made Check-in/welfare calls to the majority of our 479 registered young carers at that time.

Because of the unavoidable move to solely online services during the pandemic, we have closely considered the potential risks for vulnerable people and subsequently created and implemented the following: 'Online Safeguarding Policy', 'Safeguarding Risk Assessment for Zoom', 'Staff and Volunteer Code of Conduct for Online Sessions' and our 'Online Behaviour Agreement for Young People'. ECC did not previously offer online activities for children. Some key points include:

- Private meeting IDs and passwords used to ensure only invited people can attend
- Screen sharing options are off
- Private chat disabled (except to hosts) so this can be monitored by staff
- Staff monitor verbal conversations and the chat window and manage any situations arising following the 'Child Protection Policy and Procedures'
- Links for online activities are in the shared calendar to enable an open-door policy with Designated Safeguarding Lead access

Appendix D: Partner Updates

- There are always 2 staff in each online group session
- Staff received training on how to use the Zoom platform safely with safeguarding in mind. Test simulations where 'everything goes wrong' took place to test the ability of staff to use Zoom.
- Staff rename children to their first name on Zoom if their username contains personal information such as their email address or phone number, or something inappropriate

Enfield Children's and Young People Services

Safeguarding Enfield Annual Report information for 2020/21

The impact of Covid-19 on ECYPS and the community has been extremely challenging and difficult with staff and volunteers dealing with personal bereavement but continuing to support the most vulnerable children, young people and their families in Enfield.

From the beginning of lock down ECYPS immediately went live across all social media platforms providing essential information, activities and advice on a wide range of areas including:

- **ECYPS Foodbank**

We expanded our foodbank to meet the needs of the community in the borough of Enfield. With the rise in unemployment, many families on low income and vast amount of the community shielding due to Covid-19 families were struggling to put food on the table during lockdown. We co-ordinated our services with the support from the Felix Project, Stand Together Enfield, Grassroots and local business including Lidl, BITC and not forgetting the phenomenal response from the local residents. **24,000** bags of food were provided to families attending our foodbank at The Ark. Additionally, we delivered cooked food to **2,000** families who were shielding due to medical needs. We expanded our foodbank to include a clothes bank and toy bank. 70% the people attending foodbank are from the Bulgarian/Turkish community. We have identified gaps in services and will be working with Edmonton Community Partnership to establish a hub for the community. Looking ahead, we will be working with Edmonton Community Partnership to deliver **14,000** essential food bags to **200** families across seven schools in Edmonton.

- **Parenting support**

Due to the impact of lockdown many families were struggling with home schooling. Parents had to adapt and become teachers, activity leaders, counsellors whilst continuing to work from home. ECYPS adapted their 13-week SFSC parenting programme to a 4-week online programme focusing on positive parenting skills during lockdown. 24 workshops were delivered dealing with positive parenting techniques to increase positive behaviour.

- **Safeguarding**

ECYPS provided regular information on online safety and links full of helpful resources including NSPCC, Childline, NHS, Think U know, National domestic abuse helpline, county lines and local authority services. We delivered online training including county lines, child protection, bespoke child protection training for foodbanks, safeguarding forum. DBS-checks for staff, volunteers and community organisations continued throughout Covid-19. We produced monthly E-bulletins with helplines, emergency contact details, regular updates, details on local foodbanks-so that children do not go hungry during school holidays. ECYPS also promoted vaccination centres across Enfield. Finally, we revised our community

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handbooks and free and affordable activities books which were circulated online to organisations across Enfield.

- **Mental Wellbeing**

ECYPS produced a Covid-19 Survival Kit workbook for children and young people to improve their mental wellbeing and navigate their lives positively throughout the pandemic. As a result of securing Covid-19 funding, ECYPS was able to deliver counselling sessions for parents, children and young people subsequently assisting CAMHS who were facing a high demand on their services. Majority of referrals have been from leaving care team, Change and Challenge, Parent support and community organisations. ECYPS also produced a mental health YouTube video providing young people a platform to express themselves on the impact of Covid-19 restrictions on their mental health. We delivered 32 mindfulness sessions online, 20 creative art workshops and weekly creative writing workshops in conjunction with Scribeasy, 20 healthy eating workshops. As soon as lockdown eased we resumed our 'I feel good' sessions to provide young people including young carers and young people with additional needs pampering sessions to unwind and release stress.

- **Covid-19 Vaccines**
Supporting the roll out of vaccines to communities in mosques, churches, community centres. The ARK was a Covid-19 vaccination centre.
- **Promoting physical fitness and mental wellbeing**
Regular cycling, fitness, pilates and dance sessions delivered online and face to face.
- **Training** was delivered online via zoom. ECYPS delivered several child protection/safeguarding training to LBE staff and community organisations. 40 people attended training from the Turkish mosque, 20 local child-minders continued their training to keep up to date with Ofsted requirements.
- Due to the increase in mental health ECYPS delivered 'My wise friend' and 'Take a breath' to give staff and volunteers simple techniques to implement when services and schools re-opened.
- **CHiPS**
Community help point Scheme-Additional year of funding was secured via NEXUS and as a result CHiPS had a relaunch. Increased online presence across social media platforms, promoted via school food distribution bags to 200 families across

7 schools in partnership with Edmonton Community Partnership

Enfield Council Safeguarding Adults

Safeguarding Enfield Annual Report information for 2020/21

Safeguarding Adults

Modern slavery

Helpline: In April 2020, we established a specialist modern slavery helpline for professionals and members of the public to seek specialist support and advice, or to refer their concerns of modern slavery in the borough that they encounter. Between May 1st 2020 and January 31st 2021, we received 116 calls to the helpline.

Key achievements:

- Working with Housing to establish the Multi Agency Risk Assessment Meeting (MARAM) to support rough sleepers.
- Establishing a clear pathway of referrals with the Police, housing and secondary mental health services and the Modern Slavery Team.

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- Providing enough evidence to police colleagues to enable the CPS to charge a husband and wife with modern slavery offences. Trial to commence 10.10.21.
- Being described by the Central Crime Police Teams as the 'gold standard' borough with the view of training other boroughs on how to approach modern slavery and exploitation cases.

Strengths-Based Approach

Following the success of the 3-month trial of the 'Linking Together' Innovation Hub and subsequent roll-out of the 3 conversations model and Strengths-Based Approach (SBA) to the Single Point of Access (SPA) service, it was decided that this way of working would benefit residents and staff and we are working to implement more widely. We have a working group that meets fortnightly to deliver the vision and enhance the strengths-based practices that are already being used.

SMART Technology

A pilot has been underway with adult social care service users, carers and staff using SMART devices. Ten Amazon Echo Shows were donated by Amazon and the work has helped design a larger pilot for 2021/22 involving upskilling staff, working with care

home residents and their carers, and using the devices to support independent living for longer.

Domestic Abuse Perpetrator Programme

Strategic safeguarding has worked with the National Probation Service (NPS), Children and Families and Community Safety to commission a pilot scheme, delivered by Rise Mutual, around behaviour change for those at risk of perpetrating domestic abuse.

This is funded largely through a government grant which the NPS acquired and ran from November 2020 to March 2021. It is known that perpetrators of domestic abuse are abusive in multiple relationships throughout their life – so to multiple partners and older parents for example. So, engaging with perpetrators is essential to prevent future abuse. We have worked hard with the provider (Rise Mutual) to ensure that their service is suitable for older or disabled adults and carers to reflect the Adult Social Care service user group. Monitoring meetings were held every two months to examine this and a programme of awareness raising took place to encourage referrals.

Safeguarding Children

- **Safeguarding Ambassadors**
Weekly meetings took place with our

Youth Leaders to co-produce a training programme for a role as an Enfield Safeguarding Ambassador. The training will be used to train the 2021-22 cohort of ambassadors. The Safeguarding Ambassadors met with the safeguarding Partners as part of Enfield's Section 11 audits. Some of the actions from the meeting included developing a video by the Safeguarding Ambassadors on voice of the child. The Service User, Carer and Patient group is advising on this work.

- **Communication**

A new website platform has been developed at: www.enfield.gov.uk/safeguardingenfield. The content is now being reviewed, with a focus on increasing the amount of multimedia/video content. Regular newsletters have been to both the adults and children's partnership, highlighting the work of the partners and key issues.

Safeguarding focus during Pandemic

Supporting Care providers

In response to the pandemic the strategic safeguarding adults team has been actively working with our care providers. We have ensured they have: access to information and support around infection control; the latest

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public health guidance; and can raise issues with our quality assurance team.

Ongoing support to providers

Targeted support is provided to care support workers and informal carers to embed infection control training and translate this into good working practices, for example in how to use PPE correctly and effectively to protect all those they have direct contact with. The quality assurance team is the point of contact for care providers, and concerns and issues raised from them are then considered and responded to with the Public Health team.

Communications

We are in regular contact with our care providers, and have developed a dedicated MyLife webpage. The webpage, which was developed in partnership with Public Health, focuses on infection control information and training.

Quality Assurance and emergency processes:

Many social care providers have sadly suffered significant losses of residents due to the covid virus and the pandemic has reduced the demand for residential and nursing placements. This information is collected and considered on a regular basis.

The quality checker project continues to gather information directly from people who use services and their friends and family to ensure their experiences during the 'lock down' period is included in our considerations and learning.

Learning

The strategic safeguarding adults team undertook learning reviews with providers that had COVID outbreaks to identify risks and develop risk mitigation strategies.

Contingency planning for the winter break heightened risks

During the winter months, we were faced with acutely heightened risks around provider failure. Enfield has 13 nursing homes and over 70 residential sites. Within these organisations there was a risk of owners running into significant financial difficulties, and loss of staff either due to not being paid, developing symptoms, or being told to isolate by track and trace.

Moving adult social care service users at short notice, particularly over cold, winter months is a complex task requiring health, pharmacy, transportation and logistical input. Some care home residents are out of borough placements but we still have the safeguarding responsibility for moving them safely. Emergency preparation

and contingency planning were taking place, with weekly monitoring of care home vacancies.

Working with people who have refused to comply with government guidance

Regular meetings were taking place, chaired jointly with Public Health to consider residents, and council tenants, who had not been complying with COVID-19 guidance on social isolation and distancing. The meetings were multi-agency and provided a place where agencies could refer in, with a risk assessment, and appropriate local action could be taken. If the local measures were not successful, the group could refer to Public Health England.

Care Act Easements and Service Demand preparation

At various points though the year, Adult Social Care managers met weekly to discuss how to mitigate the increase in demand/potential further increase in demand on services due to increasing infection rates or restrictions. Actions from this meeting so far include:

Reviews and support plans have been edited on our systems to include more explicit contingency planning for if the agreed care plan is not possible.

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All informal carers who manage Direct Payments packages have been written to, to ensure that they have contingencies in place and encourage them to reach out if not.

A ‘dummy-run’ exercise has been run around a hypothetical domiciliary care agency collapse which has led to a number of identified actions to ensure that we could respond promptly to this (for example pre-written scripts/risk assessments and establishing languages spoken within the service). This incorporated all service areas.

Each operational service area has put in place a risk assessment around their service user group in case of large increases in community or staff infection.

Ethical Framework for Health and Social Care:

Department of Health and Social Care’s Responding to COVID-19 – Ethical Framework for Health and Social Care was shared widely across the adult social care services.

www.gov.uk/government/publications/covid-19-ethical-framework-for-adult-social-care/responding-to-covid-19-the-ethical-framework-for-adult-social-care

We undertook the following steps to raise awareness of the Ethical Framework:

- During the first lockdown, guidance was issued to staff around proportionate responses to Safeguarding Adults concerns, the framework was included in this guidance and associated discussions ensured that the framework was highlighted at the end of our training for adult social care professionals.
- Principal Social Worker for Adults (Sharon Burgess) sent communications to all Enfield Social Workers highlighting the framework highlighted the framework to our Safeguarding Adults Managers through our fortnightly communication with them.

Enfield Council Education department

COVID response

- Provided weekly home learning ideas for over 400 PVLs, schools and childminders.
- Supported 400 schools, PVLs and childminders on key transition points for children and young people, including providing Early Years transition for vulnerable pupils.

- Created and sent out over 4,000 Year 6/7 transition packs to all pupils in Year 6 in Enfield including for vulnerable pupils.
- The Educational Psychology Service (EPS) provided telephone support line for parents, with schools’ agreement to use their statutory visit time for this purpose.
- EPS provided support for staff and headteachers during the year, including whole school wellbeing.
- EPS supported 14 schools to achieve the Sandwell Charter Mark, which supports a whole school approach to social, emotional and mental health.
- EPS and Professional Learning (PL) team set up a ten session programme of PL to support schools in their resilience and recovery work for all pupils.
- Schools’ Traded Service worked with school to support food vouchers and/or food parcels to go to the most vulnerable families.
- HEARD and Nexus have put on three well attended parent workshops.

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Wider

- Set up a ten session PL programme, including local, national and international expertise, re: Unconscious Bias and Anti-Racism as a response to the BLM movement.
- A three session Governor training course re: Unconscious Bias and Anti-Racism has started as a corollary to that training.
- Set a ten session PL programme re: Digital Transformation for schools which included national expertise for online safety in both primary and secondary schools.
- A new Designated Safeguarding Leads (DSL) network for school DSLs has been set up.
- The SEYIS adviser visits to schools included questions about the remote learning offer. This checked that all pupils were being contacted and how schools reacted to any lack of response from a pupil or family.
- Whole service Safeguarding training took place in September 2020.
- All NQTs were able to join LA run safeguarding training within their first half term.

- Trauma Informed Practice in Schools (TIPS) was promoted via two taster sessions open to schools and all members of the Education Service.
- Nexus funded training for all schools from Pivotal education linked to restorative practice and TIPS.
- SWERRL/BSS have support vulnerable pupils in their return to school.

Enfield Council Housing

Safeguarding Enfield Annual Report information for 2020/21

As part of our work towards a DAHA accreditation we have developed a new Housing and Regeneration Domestic Abuse policy which will be circulated to our stakeholders as part of the consultation on this policy.

We have procured a review of council housing processes including an external review of our Anti-Social Behaviour processes, with particular scrutiny of the frontline staff's approach to cases involving vulnerable residents

As part of the wider Housing Services restructure, a new team delivering a person centred, tenure blind, support service for

council housing residents has been created. This team will be ensuring the most vulnerable residents in the borough receive holistic, structured and sustained support to help them maintain the tenancies and achieve personal goals to decrease levels of extreme deprivation, ASB, and public health issues.

We are developing an estate management strategy focusing on delivering our place shaping agenda, including actions to increase wellbeing and engagement across Council Housing.

Safeguarding Adolescents From Exploitation (SAFE) panel, meets fortnightly – Housing Management are a core member.

We are developing a vulnerable resident procedure, setting out our processes for supporting and engaging residents who are at risk of neglect and abuse.

We are continuing to develop our staff training plans, which will include an annual safeguarding training (refresher) course.

Homelessness

We have developed suicidal prevention guidance for dissemination to all Officers across housing and homelessness services.

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The Housing Advisory Service has developed guidance (still in draft) to support referrals into adult and children services. This will be rolled out this summer alongside briefing on Domestic Abuse Act.

On 5th July 2021 the Domestic Abuse Act 2021 removed the vulnerability test for survivors of domestic abuse. This now means that all survivors of domestic abuse who approach the homelessness service will be in Priority Need. Training and briefings continue to be delivered across the homelessness service and with colleagues in other Council services to meet the new duties.

MARAC meets fortnightly and is attended by, Sustainable Housing Pathway Manager.

We are currently working towards the DAHA Accreditation alongside housing colleagues.

There is service- wide need for safeguarding training over and above the I-learn offer, which the service will be looking to secure by Autumn.

Safeguarding focus during Pandemic

Housing Needs

Safeguarding and ensuring the safety and wellbeing of local residents was at the heart of changes to the way housing needs services

were delivered during the Covid-19 pandemic and 'lockdown'.

1. Street homelessness was addressed quickly through compliance with government guidance to move rough sleepers from shared housing to self-contained housing within days of the announcement.
2. Rough Sleeper accommodation/support delivery plan developed – those who were assessed as homeless or at risk of sleeping rough were accommodated during 'lockdown' in hotels or self-contained accommodation. This meant more single people and couples without children were kept safe.
3. A new dedicated Housing Advice Telephone line was introduced immediately after 'lockdown' to re increase access to services/replace Face to Face contact at John Wilkes House (main Housing Needs Office) when the Council building closed. New access arrangements were immediately communicated widely across the Council/Voluntary and Community Sector. Information was translated into community languages. When Enfield and Edmonton libraries opened to the public, a Housing officer has been located there to support library staff providing services to

customers at risk of homelessness who do not have digital access or a phone.

4. Three Housing Officers were appointed to the Council's Domestic Abuse Hub in recognition of data showing an increase in domestic abuse during 'lock down' to work exclusively with this client group carrying out risk assessments, safety planning and identifying safe accommodation; welfare checks were carried out on all open homeless cases where domestic abuse was reported as the cause of homelessness.

Housing Management

During the Government Lockdown imposed from 23rd March 2020, the Housing management team undertook a "Welfare and Wellbeing checks" programme, calling all known vulnerable residents and those believed to be at risk of abuse or neglect. The service maintain regular contact with all sheltered housing residents and a significant portion of our residents over 65 in General Needs accommodation who have requested ongoing support.

We are working in partnership with the Riverside Floating support service to help residents carry out tasks associated with independent living, utilise technology (where appropriate) to assist in their support and longer term wellbeing, and

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access information, community resources and social interaction to avoid becoming socially isolated since lockdown restrictions have been lifted, the housing management team are now undertaking a series of welfare checks and welfare visits to residents with whom the service has had little or no contact.

Staff have had specific training in identifying signs of abuse and neglect, as well as training for identifying and supporting those suffering from Domestic Abuse during the Covid period.

Healthwatch Enfield

Safeguarding Enfield Annual Report information for 2020/21

Healthwatch Enfield was established to act as the statutory, independent consumer champion for health and social care services in the borough. Our roles and responsibilities include:

- Obtaining the views of local people regarding local health and care services and importantly to make these views known.
- Promoting and supporting the involvement of local people in the commissioning, the provision and scrutiny of local health and care services.

- Providing advice and information about access to local health and care services.
- Enabling local people to monitor the standard of provision of local health and care services and whether and how local care services could and ought to be improved.
- Formulating views on the standard of provision and whether and how the local health and care services could and ought to be improved; and sharing these views with Healthwatch England.

Healthwatch Enfield is also able to raise relevant issues at a number of strategic boards. This allows us to provide support as well as challenge and highlight issues raised by local people in the development and delivery of local strategies.

In terms of safeguarding, Healthwatch Enfield

- ensures that our Board, staff and volunteers are trained to understand and follow up any safeguarding concerns identified by us or raised with us in our work locally
- arranges refresher safeguarding training for staff, volunteers and board members
- has reviewed our safeguarding policy in May 2020

- supports and challenges data presented at a number of strategic boards

We have promoted safeguarding training opportunities.

We deal with any specific concerns raised with us and when appropriate refer these to the CQC and welcome the support of senior managers in follow up work.

We value the strong commitment to improving engagement and understanding of safeguarding across all communities.

We have been working with the Council's Covid Resilience Board during the pandemic as well as supporting a number of regular meetings particularly to support vaccination take-up recently. It should be noted that the joint working expected from the Integrated Care Partnership has been accelerated by developing an Enfield response to covid vaccine take-up. This has been a really positive development and bodes well for the future. It would be useful to learn lessons from this joint working approach, in our efforts to work with local communities with regard to raising awareness about safeguarding and domestic violence.

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Safeguarding focus during Pandemic

- We have promoted information about safeguarding and particularly domestic abuse throughout the pandemic.
- We have also run a number of webinars most recently focussed on mental health.
- We have continued to work with the Council's Covid Resilience Board during the pandemic.
- We have also attended weekly meetings led by local GPs to support the vaccination process in Enfield. Our work with local black and minority ethnic communities has enabled us to support this process and the efforts being made to reach out to all communities in Enfield.
- We have drawn attention to the challenges faced by Eastern European, primarily Bulgarian/Roma communities, particularly those who do not have settled status and are engaged in sex work. We are working with the Council/Health on vaccine take-up and GP registration.

Integrated Learning Disabilities Service (ILDS)

Safeguarding Enfield Annual Report information for 2020/21

Safeguarding Adults

EILDS continues to provide a multi-disciplinary approach to managing PMLD which includes social, physical, psychological, and mental health assessments.

- Safeguarding concerns have continued to be received by the service and safeguarding plans are completed within usual time frame, essential face to face meetings have taken place during lockdown where tech/video was seemed not appropriate for service users.
- In some cases, following closure of a case, a review may take place (3 months) to make sure all protective measures are still robust and that service users are safe, and any agreed actions have been completed.
- Throughout the safeguarding there is continued Management support and oversight and clear directions from the Sam is recorded in cased notes.

There has been continued work to an excellent standard, managing some very complex safeguarding cases and all were responded to with MSP continuing to be a focus.

Examples of excellent practice by an officer

Case example and feedback extracted from the internal safeguarding enquiry audits:

The safeguarding concern is raised by an art therapist working with the client who raised concern regarding psychological abuse and neglect perpetrated by the client's support worker and centres on her responses to the client when asked for particular support and the worker's view that the client should not be in bed at certain times of the day which the client explains is a side effect of her medication. The client specifies she feels she is being bullied by this individual and explains that this is impacting on her mental wellbeing.

Good Practice

Safeguarding plan implemented that the person alleged to have caused harm in this case is removed from the client's support arrangements. This is a robust plan which removes the risk of further abuse for the client, it is acknowledged that as the support worker works for an organisation, there could

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be further clients at risk in this case. These risks are considered by the safeguarding adults manager who requests that the enquiry officer has input into the interview questions to establish how long the support work had worked for the organisation, to review her training records and to establish whether there have been any concerns raised about her conduct by other clients.

The enquiry officer emails the manager with a list of constructive questions to be referred to within the interview with the support worker, these centre around the support worker's knowledge of the clients can support needs and around dignity and respect.

There is good evidence of engagement with the adult.

The client's voice is captured well and there were explicit verbatim statements which form her safeguarding outcomes. There are recordings regarding the client's capacity with regards to safeguarding concerns and is clear through the engagement and dialogue with professionals that this is the case, this is well evidenced. Another area of good practice is the co-production of the safeguarding plan with the client to ensure that she has a sense of ownership and control over the safeguarding

process and how this impacts her own support arrangements. The making safeguarding personal principles identified as relevant in this case were Control by the individual over day-to-day life, Protection from abuse and neglect and Physical and mental health and emotional wellbeing.

There is clear and detailed SAM oversight. Guidance is provided by the safeguarding adults manager around the next steps and a time frame set for the safeguarding adults manager to be updated three days later.

This enquiry audit has established areas of good practice in respect of making safeguarding personal and approaches to practice. Safeguarding principles are well evidenced, and recording is to a good standard, furthermore, there is a clear narrative as to the client's views, wishes and outcomes at each stage of the enquiry. There have been some areas for learning which have been identified which has been shared at the Social Work Forum within their service.

Safeguarding focus during Pandemic

- We have continued to offer all specialisms in the service and prioritised urgent review and associated clinical work to support individuals and keep them safe at home; we

have used technology in various different forms and developed a series of social stories and accessible information both for our website information and for individuals.

- We have made over 2,500 welfare calls to those who are high risk; non-compliant; no access to internet etc. and working with those who are non-compliant with multiple agencies involved to make sure they are safe.
- We have been working with parents and carers to support significant anxiety level and the challenges around the apparent inequality and national reporting of the approach especially to testing and reporting mortality and also access to PPE – most people with complex LD needs live at home and in supported living accommodation and not included are homes so access to testing excluded those with PMLD. In Enfield we have acknowledged this, and we acted very early on to ensure people who needed PPE had the PPE they needed.
- We have set up our own test site for LD and MH to ensure service users safety.
- Vaccination Hub at the Chase Farm Hospital has been available for people with learning disabilities and autism and their parents/

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carers. The hub was supported by 2 members of staff from the ILDS. Most of the Service Users returning to the Day Services have received their first vaccine.

- We have been particularly challenged in LD by the number of deaths for 2021 is 26 and 18 having covid as a contributing factor. Findings indicate good access to the health and care they needed at that time.
- Mortality rates rocketed to 630% in April/ May; over the year the average has increased by 250% All Rapid Reviews have been completed; all full LeDeR reviews on track.
- 8 out of the 10 died in hospital which indicates the correct processes followed and clinical oversight provided.
- Most have been subject to a full LeDeR review, and there are seven still waiting for their reviews to be completed.
- PWMLD have been disproportionately affected and live in the family home.
- We have supported and prevented admissions, as well as supporting individuals through a multi-agency approach to receive the care and support needed in hospital.

- As a service, we have continued limited essential face to face assessments, MCA and BI and safeguarding to ensure the safety of our service users.

Testing/Infection Control

- All Enfield-based day services, including IWE, have re-opened w/c 12 April 2021. As in September 2020, robust infection control measures have been put in place to ensure highest level of infection management for both Service Users and Staff.
- The testing regime has been put in place which includes:
 - Weekly PCR testing for all Service Users and Staff
 - 2-weekly LFT testing for all Service Users
 - Daily LFT testing for all staff
- LFT testing kits have been delivered to individual families/Service Users and support has been provided to ensure families/SU are confident in taking the tests.

Bubbles

- The first week re-opening started with the bubble of 5 service users, followed by another bubble of 5 in second week (w/c 19 April).

- There will be no new bubble introduced in week 3 (w/c 26 April) to give providers and LBE an opportunity to review the situation and assure ourselves that there is no increase in infection rates, before introducing the third bubble to keep everyone safe.
- The third bubble of 5 will be introduced w/c 3 May and we will continue facilitating the return of more people each week until we reach full capacity.

Virtual Offer

- Not all services will be able to operate at the same capacity as before the Pandemic due to social distancing measures, however the appropriate level of support is provided to all services users who continue to remain at home.
- ILDS in partnership with Radiomathon is developing a Virtual Offer as an add on option to the building-based day services locking in positive changes, including utilisation of technology, introduced during the Pandemic.

Support to providers

- We are continuing with fortnightly meetings with our day service providers to ensure we pick up on issues/challenges and provide

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support to our providers. So far, providers are reporting very positive outcomes following the reopening and are very happy to see the day centres filling up with people.

Older People

- The same infection control and testing measures have been applied to older people day services.
- However, due to the fact that most older people have now received their second vaccination and there is substantial evidence to support the effectiveness of the vaccines, it was decided that it was safe to increase the bubble size of 10 for older people.
- As with people with Learning Disabilities, commissioners and operational managers continue monitoring the situation closely to ensure the building -based day service environment continues to be as safe as possible.

London Ambulance Service

To read updates from the London Ambulance Service 2020-21, please go to www.londonambulance.nhs.uk/about-us/our-publications/

London Fire Brigade

Safeguarding Enfield Annual Report information for 2020/21

A subject for our recent Borough Training Days has been ‘Safeguarding’ and our commitment to this. Our own referral process was communicated to all personnel working for LFB within the Borough. We have worked collaboratively with Enfield Council in the establishing of a Hoarding Database to record individuals with hoarding behaviours and their properties forming a ‘one stop shop’ for access by partner agencies.

Safeguarding focus during Pandemic

Although our Home Fire Safety Visit programme has been temporarily halted we continue to visit households raised as ‘high risk’ as part of a referral and also those that are passed to us as high risk by partner agencies or from attending incidents.

All options are being looked at to begin HFSVs with appropriate social distancing measures.

Despite the challenges faced crews carried out 677 Home Fire Safety Visits during the period 2020-21 one and 402 of these visits have been for our most high risk individuals.

London Metropolitan Police, North Area BCU

Safeguarding Enfield Annual Report information for 2020/21

Safeguarding Adults

- Continued focus on Modern Slavery and roll out of training to all officers through LA and ‘Train the Trainer’ SME scheme. Identification of High Risk subjects and appropriate safeguarding measures in place.
- Trigger plans created by Missing Persons Unit for vulnerable persons and those missing on more than one occasion to ensure Local Authority intervention and collaborative safeguarding measures.
- Continued support of the Enfield DA Hub to ensure that delivery was maintained across the borough.

Violence against Women and Girls

- **VAWG Strategy and Tactical Plan** – was written in March to ensure a collaborative approach across the BCU.
- **Offender Management** – A key tactic in reducing risk was tackling offender management and targeting those high

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harm VAWG offenders. A bespoke system for VAWG offenders has been created and shared across the MPS through the central weekly dial ins chaired by Commander Alison Heydari. Since the introduction at the beginning of April we have seen a reduction of offenders wanted for VAWG offences.

- **Partnership Approach** – VAWG leads in Haringey and Enfield have been reached out too. The Policing Plan has been explained and input provided to both Local authorities at a strategic level including VAWG steering group and Strategic board. Scanning across both boroughs has been completed to identify charities and VAWG groups to reach out and encourage awareness and reporting to Police. There are almost 100 variations of different VAWG support groups with multiple service users across the BCU.
- **Training** – In May, a cohort of Public Protection officers are participating in ‘Train the Trainer’ knowledge exchange sessions through Enfield Council – focusing on VAWG and Stalking awareness where learning can be shared with fellow professionals from across public services and health.
- **National Stalking Awareness Week – 19-23 April 2021** – Daily stalking awareness

sessions were delivered to front line officers by police SME’s, schools officers attended a number of schools to promote ‘clever never goes’ – formerly ‘stranger danger’ to promote practical personal safety skills for primary school children without causing unnecessary fear or mistrust of strangers. The new message instead teaches children to recognise unsafe situations to reduce the risk of abduction, including by persons known to the child. A bespoke review of all outstanding stalking suspects and stalking protection orders were considered for each case. There was a central national newspaper/broadcast and social media campaign promoting the week and encouraging victims to come forward from the MPS stalking lead.

- **Intelligence** – A dedicated analyst has reviewed crime data for the previous three months of the open space hotspot data in Enfield and Haringey for offences and plotted these areas on a map – the patrolling units have been provided with this data as well as images of known offenders for sexual offences and vulnerable CSE children to ensure that robust action is taken against perpetrator’s and safety measures put in place around victims.

- **Safeguarding sex workers and targeting offenders** – Op Boxster – A long-term, dedicated operation by SNT Taskforce with the responsibility of reducing offences involving sex workers, associated crime and ASB in and around N17 and N18 using covert and overt policing tactics. The team work with various internal and external partners along with agencies to employ an array of tactics and strategies to meet operational objectives. As well as targeting those individuals responsible for soliciting, the team also provide an intelligence capability to identify any persons who may be at risk but also known offenders.
- **VAWG Day of action – 13 May 2021** – Police in uniform and plain clothes from North Area completed various activities across the BCU to highlight how we are working hard to prevent violence against women and girls, bringing offenders to justice and supporting victims, as well as engaging about the subject in a variety of ways. We targeted wanted offenders, focusing on arrest enquiries and providing extra people and resources to do so. Reassurance patrols were increased in public spaces with officers and staff taking the opportunity to engage with communities about what we’re doing. This also

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included transport hubs such as train and underground stations and bus terminals. One male targeted by officers had carried out a random attack on a lone woman earlier in the week. He was identified by an eagle-eyed neighbourhood officer and a man-hunt launched. Following a relentless pursuit through the week he was arrested and convicted for the assault. He awaits sentencing.

Safeguarding Children

- **Operation Sharda** – Contextual safeguarding – Reaching out to young people to identify the safe spaces and predatory areas which they signpost from experience and do not necessarily reflect crime trends. Mapping and additional patrolling in those areas is undertaken. Working with partners including Local Authority to gather a full analysis of the issues how to maintain the safety of young people.
- **Operation flute** – NA Exploitation Unit (contextualise safeguarding op) identifying vulnerable locations that have a high prevalence of exploitation offences and intelligence whilst working in partnership to raise awareness of exploitation with local businesses, proactively targeting exploiters and performing outreach to potential victims.

- **Parents Exploitation Leaflet** – Identifies the signs of exploitation for parents and directs them to Police and support Services. This is cascaded to young people who interact with the police including CSE victims of crime.
- **Re-designed CSE disruption toolkit** for targeting perpetrators through MACE.

Examples of excellent practice by an officer or team

In February 2021 North Area CSE Team received the London award for Innovation and Partnership working in the MPS as shining example of collaboration and protection of young persons showcasing all their good work including through the pandemic. This is testament to the professionalism and tenacity of the team.

Safeguarding focus during Pandemic

- A COVID strategy in place throughout the strategy which has evolved in line with transmission of the virus
- Blended working has taken place with staff and regular communication and support provided

- Staff have adapted to using Technology and video conference facilities
- Re-alignment of staff where required to ensure continued focus on service delivery
- A return to work policy is in place to reassure staff and ease any anxieties

National Probation Service

Safeguarding Enfield Annual Report information for 2020/21

Safeguarding Adults

There have been checks in place to ensure that all staff are up to date with mandatory safeguarding adults training. Quality development officers have completed audits on cases to ensure best practice. Officers make referrals to Safeguarding adults where appropriate. A pan-London briefing has been delivered on best practice and interventions around DA, stalking and HBV. Where applicable officers attend CPAs and incorporate care plans into risk assessments. Safeguarding adults are part of the MAPP panel to advise on cases discussed in this multi-agency forum. A seven-minute briefing has been produced on working with autism. As a wider inclusion and diversity programme for both staff and service users briefings and exercises around

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race, disability and LGTBQ needs have been disseminated. Specialist advisor available for consultation around chemsex cases where sexuality and MH add to vulnerability. Specialist pan-London briefing on working with MH and PD.

Safeguarding Children

There have been checks in place to ensure that all staff are up to date with mandatory safeguarding children's training. NPS London division has also completed a quality assurance exercise to ensure that not only is staff training up to date but that section 11s have been completed and that MARAC/MASH in each Local authority have been approached for feedback. Feedback received from Enfield indicated that whilst Probation (not specified CRC or NPS) attends CP conferences a report is not always provided. As a result of feedback staff have been provided with a report template and briefed to provide a report whether or not they attend in person. Quality development officers have completed audits on cases to ensure best practice. Specialist pan-London briefings on Safeguarding Children, Working with adults who offend against children (sexual and indecent images); youth transition to adulthood and SGO cohort. Safeguarding adults are part of the MAPPA core panel to advise on cases discussed in this multi-agency forum.

Examples of excellent practice by an officer or team

Wendy Fleming-Hodge, Probation Officer is managing a female offender convicted of Conspiracy to Rob, which involved multiple co-defendants and presence of a firearm. She was released to Approved Premises in 2019 and absconded via a window in December 2019. The whereabouts of the service user were unknown until NPS were contacted by Police in Milton Keynes informing us that the service user had given birth to a child in March 2021. We were informed that Children's and Families were supporting the mother given that the baby suffered complications. The service user was subject to recall and despite the traumatic birth there were no grounds to rescind the recall. WFH has worked closely with Children's and Families, Police and Prison Probation to make a decision where professionals were in agreement to arrange for the mother to be returned to prison on a mother and baby unit whilst a review of the recall and risk assessment could take place. This work has been undertaken via professionals meeting and a stand-alone MAPPA Level 2 Meeting to ensure that decisions and actions can be taken expediently.

Here in Enfield NPS this is our first experience of contributing to decision making which resulted in the Police actioning a warrant and safely returning the service user and her new-born to custody. This demonstrates the importance of multi-agency work to safeguard children.

Safeguarding focus during Pandemic

Response has varied during lockdown. In first lockdown in line with government guidance offenders/service users over 70 were not required to report for face to face supervision, it was conducted via phone. Other service users have continued to report face to face but the frequency varies depending on risk – focus is on those who are high risk or where there are DA and Safeguarding concerns. Older or vulnerable adults where isolation is a factor can now be referred to a charitable organisation SWM to provide extra support that is not mandated.

NHS North Central London Clinical Commissioning Group, Enfield Directorate

Safeguarding Enfield Annual Report information for 2020/21

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Safeguarding Adults

The NHS England Safeguarding Accountability and Assurance Framework (2019) sets out the statutory safeguarding responsibilities for the CCG which is central to the role for Designated Safeguarding Clinical Commissioners. The CCG has a statutory responsibility to ensure that they, and the organisations that they commission from, have systems and processes in place to safeguard children and adults at risk.

Safeguarding MASH (Adult) Nurse

The Safeguarding Adults team have continued to maintain strong partnership working with the NCL CCG, Enfield Directorate in the reporting period of 2020-2021 with the Local Authority in the following areas:

MASH (Adults) has been fortunate to have the support of a qualified Nurse subject to funding by the Clinical Commissioning Group. The role of the MASH Nurse Assessor has been invaluable within the MASH team when working in a multi-agency context, working with: Nursing Homes, Hospitals, General Practitioners and District Nurses'. A clinical perspective in scoping the points to consider when requesting an enquiry enables more focused reports which allows for better learning and therefore preventative work. This has

prevented the current delays and duplications which is found when social care staff must assess and decide on the lines of enquiry around clinical issues.

Modern Day Slavery

- The Local Authority designed and executed a virtual Modern Day Slavery Conference which was funded by NCL CCG Enfield. The Conference presented and discussed Modern Day Slavery in the United Kingdom with a particular focus on Enfield.
- Arrangements were made for General Practitioners to attend Modern Day Slavery training.
- Safeguarding Adult Lead has trained quality and commissioning staff, in Enfield Directorate on Modern Day Slavery and how to refer service users.

Pressure Ulcer Panel

Within this strong partnership of NCL CCG, Enfield Directorate has funded and provided an expert nurse in Pressure Ulcers for the Enfield Local Authority and new NCL CCG Enfield Directorate, Pressure Ulcer Panel. The Pressure Ulcer Nurse has worked with the Pressure Ulcer panel to the highest level to effect a lasting change, to begin the process

of improvement in the protection of vulnerable adults open to abuse from developing pressure ulcers. The panel is an advisory panel to the Local Authority Safeguarding Adult Manager (SAM). The Local Authority are responsible for receiving and managing safeguarding concerns, causing others to undertake enquiries when necessary, ensuring the implementation of the Making Safeguarding Personal agenda. The concerns relate to the reporting pathways currently operating between Enfield health providers in the reporting of pressure ulcers for investigation to Enfield Local Authority.

Liberty Protection Safeguards (LPS)

In preparation for the implementation of LPS in April 2022, the NCL CCG Heads of Service were briefed on LPS and the impact Continuing Health Care. A proposal is being prepared for specific support for community DOLS across NCL, with a view to also providing practical support for the LPS post implementation. The CHC are scoping the current number of potential Community DOLS, as well as understanding the number of patients (in nursing homes) currently subject to DOLS who will be transferred to the CCG in April 2022. The CHC team are being supported on preparing for the new legislation.

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NCL Safeguarding Adult Leads and Health Providers have received the draft LPS training framework for comment, with comments being sent back on behalf of NCL. In March 2021, a briefing paper 'NHS preparation for implementation of the Liberty Protection Safeguards (LPS)' for the Safeguarding Adults National Network which received input from a NCL Designates, will be approved for distribution by the end of May 2021.

Safeguarding Business Continuity Plan – COVID-19

The Designated Professionals have continued to monitor, and quality assure the NCL Safeguarding Health Providers Recovery and Restoration Plans for COVID-19. This has demonstrated that there is adequate assurance of the safeguarding elements of all health providers across NCL. Ongoing borough level safeguarding assurance in the delivery of providers recovery and restoration plans is obtained through Designated attendance at providers safeguarding committees and at local partnership meetings. Where gaps are identified, further assurance has been sought and is monitored at a local level by the relevant borough Safeguarding Adult Lead. There are no plans that required escalation.

Working with Commissioned Services within in NCL CCG, Enfield Directorate

Safeguarding Adult Lead has worked with commissioned services to ensure that safeguarding processes are in place.

Safeguarding Lead and Quality Nurse Assessor

Safeguarding Lead and Quality Nurse Assessor forms part of the wider implementation of an integrated health and Social care strategy for care homes in Enfield. This contributes to enhancing the care delivered to Enfield's care home population. The post works in partnership with London Borough of Enfield to ensure robust systems and processes are in place. Care home engagement has increased considerably following the implementation of this role and some of the key achievements:

- Better Medicine Management
- Clinical Care Planning
- Pressure Area Care
- Making Safeguarding Personal
- Action Planning with Care Homes regarding CQC Action Plans.

Safeguarding Children

The Safeguarding Children Partnership in Enfield moved to virtual meetings in 2020/21.

The Executive team met more frequently as the other sub group meetings were stepped down in the first two quarters. The CCG Designated Nurse represented the CCG along with the then Managing Director for Enfield. The executive responsibility now sits with the NCL CCG Director of Quality and Chief Nurse who attended for latter part of 2020/21.

One area of focus for the Partnership is data analysis and audit to assess multiagency work, in particular case conferences. It was noted the business support unit for the Partnership did not have sufficient children's experience to lead on this area of work. Enfield Directorate agreed to increase the financial contribution in line with other NCL Directorates which has aided the development of this work.

The Designated Nurse and the Named GP undertook a piece of work on case conference requests and reports. This included tracking the request for information through to report submission. The Designated Nurse and Named GP had a series of practice visits after the initial restrictions were eased. The practice visits have been put on hold due to the pandemic. Some of the issues identified in the visits included NHS mail inadvertently marking the requests as Junk and the short timeframe for turnaround from requests to submission. In addition, there

Appendix D: Partner Updates

is inconsistency across the 5 boroughs on how GPs are supported with other CCG Directorates paying the GPs for their time to complete the reports. Results of the audit will be shared with the Exec team in June 2021.

The Designated Nurse for Safeguarding attends the Practice Improvement group which continued to meet on a regular basis in 2020/21. The Practice Improvement group is a joint safeguarding children and adult sub group which looks at areas to improve practice, learning from case reviews, including Local Learning reviews and Safeguarding Adult reviews. Enfield Directorate commissioned a piece of work by an independent reviewer to look at recommendations from the various reviews, identify themes and develop a framework to support learning.

The CCG Designated Nurse represented the CCG at the national Serious Youth Violence summit in March 2021. Each of the three Ministerial departments were represented with the junior Ministers opening the event. There is a commitment to joint working to reduce the incidence of Serious Youth Violence. Enfield remains an area of concern and is the highest borough for incidents of Serious Youth Violence in London. The Designated Nurse attends the Oasis Youth Hadley steering group

which supports a youth worker in A&E at the North Middlesex University Hospital. Support was offered virtually over the lockdown period with a notable decrease in the number of attendances to A&E.

There continues to be gaps in the Designated Doctor functions for Enfield. The interim post-holder is working at full capacity to ensure children who require Child Protection Medical Examinations and Adoption/Fostering medical examinations are seen. Therefore, the Designated Doctor for Looked After Children, Safeguarding Children and Child Death are not being covered. The Designated Nurse for Safeguarding Children and the Designated Nurse for Looked After Children are working closely with the Safeguarding Children Partnership leads and the interim medical lead, however there continues to be an unmitigated risk. The interim medical has escalated the gaps to the Clinical Medical Lead for Enfield Community services at Barnet, Enfield and Haringey Mental Health Trust. The Trust is actively trying to recruit to the posts.

The Safeguarding Lead GP forum met on 3 occasions in 2020/21 via teams. There was an increase in GP practices represented at the forum with a plan to continue to offer a virtual platform for attendance. The focus of

the sessions was on hidden harm, in particular Domestic Violence and Abuse. The Named GP for adults delivered a training session on Coercive Control and recognising the signs. The Designated Nurse for safeguarding discussed the learning from a Local Learning review on a case involving home schooling, with a focus on making every contact count. There was also a presentation from Rise Mutual on their work with perpetrators.

Examples of excellent practice by an officer or team

The Designated Nurse for Looked After Children provided exceptional support to her team and ensured children in care continued to have their health needs met. In spite of the lack of designated medical support, the Designated Nurse has worked with the Local Authority and other professionals to minimise the gaps in provision.

The Named GP for children provided front line support to NMUH A&E and Chase Farm Urgent Care during the pandemic. He worked tirelessly to treat patients at both departments. His attitude and approach to work supported numerous front line staff during this exceptionally difficult time.

Appendix D: Partner Updates

Safeguarding focus during Pandemic

Safeguarding Adults

- Business Continuity Plan
- Three-year Safeguarding Strategy
- Continuation of work in Continuing Health Care
- Education of NCL CCG Enfield Staff on Hidden Harm due to the COVID-19 Pandemic
- Safeguarding Lead and Quality Nurse Assessor continued to support Care Homes face to face during the pandemic

Safeguarding Children

On the first of April, 2020 Enfield Clinical Commissioning Group (CCG) became part of the North Central London CCG. Each Directorate safeguarding lead worked collaboratively to develop a NCL wide safeguarding strategy, work plan and risk register. The CCG Designated Nurse continued to support the NCL Child Death Overview Process one day a week.

The CCG co-ordinated a webinar training session for primary care and provider leads on Domestic Violence and Abuse across NCL. There was also continued focus on the Identification and Referral to Improve safety project. During the pandemic, there was a notable decrease in the number of referrals to the service with the advocates providing

virtual and telephone support. The advocates attended various forums to continue to highlight their offer of support and to offer tips on assessing risk using virtual assessments.

The NCL Designated Professionals have continued to monitor, and quality assure the NCL Safeguarding Health Providers Recovery and Restoration Plans for COVID-19. This has demonstrated that there is adequate assurance of the safeguarding elements of all health providers across NCL. Ongoing borough level safeguarding assurance in the delivery of provider's recovery and restoration plans is obtained through Designated attendance at providers safeguarding committees and at local partnership meetings. Where gaps are identified, further assurance has been sought and is monitored at a local level by the relevant borough Safeguarding Leads. There are no plans that required escalation.

The provider safeguarding teams continued to provide a high level of safeguarding support during the pandemic. In spite of exceptional circumstances, teams at BEH, NCUH and the Royal Free NHS Trusts worked incredibly hard to ensure vulnerable children were identified and referred. There has been a notable increase in the number of children requiring additional support with their mental health

needs and all three Trusts have responded swiftly to get the support in place.

North Middlesex University Hospital NHS Trust

Safeguarding Enfield Annual Report information for 2020/21

Safeguarding Adults

The Safeguarding Adults team (SGAT) have continued to maintain strong partnership working with the local safeguarding teams during the pandemic and periods of local down. The safeguarding team have maintained safe and consistent service ensuring all adults at risk have had their needs responded to.

During the pandemic the SGAT has seen a rise in the number of concerns relating to Domestic Abuse and Self Neglect.

The Pathfinder Project onsite Domestic Abuse services withdrew from the site in March and continued to provide telephone support and engagement with our survivors on Domestic Abuse. The contract for the service ended in November 2020 and the Trust has now successfully recruited into its own IDVA service to support its patients.

Appendix D: Partner Updates

The Integrated Safeguarding team supported the 16 days of action in November 2020 with a series of social media posts and blogs on our internal intranet. This also marked the start of the White Ribbon application process.

During 2020/21 the SGAT have worked with the governance team to develop a central electronic recording system for all safeguarding concerns raised both by the Trust and against the Trust. The team have also developed a central recording system for all DOLS applications. Both systems can be accessed by all divisions and provide opportunities for audit of processes and data collection.

Safeguarding Children

Safeguarding children team have maintained good communication links with partner agencies to ensure sharing of information during lockdown and closures of Paediatric services at NMUH.

Youth on youth violence

Oasis Youth Service. During lockdown virtual working with young people or meeting in open areas – some positive engagement with working virtually seen. Funding obtained to have youth worker support young people in police custody – ‘golden moment to get engagement’.

There has been strong multi-disciplinary working in the care, planning and management of pregnant women with complex needs, requiring close working with the Learning Disability, Perinatal/Psychiatric liaison teams and social care in managing on-going care.

Pilot Project

PMHS (Perinatal Mental Health Service). There is a pilot project for trauma based interventions for 12 months in Enfield/Haringey/NMUH which will include women that experience parent/infant separation due to safeguarding procedures.

NMUH Trusts Named Midwife is working with partner agencies to update the maternity protocol/referral criteria and there is continued work with Enfield local authority to review the pre-birth protocol for safeguarding procedures.

Examples of excellent practice by an officer or team

Frontline staff including the A+E/ITU staff continued to maintain their safeguarding responsibilities throughout the pandemic in difficult situations.

Safeguarding focus during Pandemic

Children and Adults

- Executive team supported for Safeguarding team to remain on site throughout and staff were not redeployed to other areas
- NCL reconfiguration of paediatric services/ COVID – NMUH ED remained open throughout. Inpatient services were transferred to GOSH during both lock down periods. Strong network links made with GOSH safeguarding team to manage CP cases and transfer back
- During first lockdown the total numbers of referrals made remained similar despite ED attendance numbers lower.
- There has been a continued increase in the number of children and adults attending the ED department with mental ill health concerns throughout, which could be COVID related – increase in need for Tier 4 bed
- Youth on youth violence referrals noted to reduce when schools closed
- Solace continued to provide telephone support to all our survivors of domestic abuse

Appendix D: Partner Updates

- Throughout the lockdown we have maintained community nursing and midwifery for babies and children.
- Training figures maintained
- Safeguarding services have continued to be provided at a consistent level

Safeguarding referrals have continued to be completed maintaining pre-lockdown figures.

Royal Free London NHS Foundation Trust

Safeguarding Enfield Annual Report information for 2019/20

Safeguarding Adults

Partnership working between agencies working to safeguard adults at risks of abuse and neglect has developed an “unprecedented” focus on virtual working and communications during the coronavirus outbreak.

RFL NHS Foundation Trust’s new integrated discharge team (IDT) is focused on helping patients to return home, and ensuring that they get the care they need when being discharged.

In order to do this, the Trust is working closely with partner organisations including community health care providers, local CCG and Local authority. This allows a safe and streamlines discharge processes, supporting each other in the quick and appropriate discharge of patients.

Since March 2020 the Independent Domestic and Sexual Violence Advisors were working remotely but remained allocated to specific hospital sites and were adequately supported with appropriate IT equipment and access to information to support staff and patients. We were able to work together to deliver targeted domestic abuse training for our mental health first aiders who support our staff.

The MCA and the related Deprivation of Liberty Safeguards (DoLS) has not been altered by the emergency Coronavirus Act which went through Parliament in the week beginning 23 March 2020. While the law remains the same, there are implications for the use of the MCA during the coronavirus outbreak. All Best Interest Assessments (In relation to DoLS) were completed remotely.

The challenges of completing these assessments are magnified when done remotely. RFL NHS Trust made IT equipment

available for all wards to support external colleague to carry out these assessments by telephone or video link. The safeguarding team was always available to support them as accessing good support – from colleagues and managers, – is crucial to deprive someone from his/her liberty within the legal parameter.

Virtual safeguarding adults Board was very effective to bring multi agencies together and focusing on challenges of safeguarding adults due to COVID-19.

Safeguarding Children

Child protection case conferences, strategy meetings and core groups are now all conducted virtually and this has made it easier for staff to attend. Enfield children social workers and the wider children network access the virtual multi-disciplinary meeting for pregnant women who are vulnerable.

We continued to implement the better births programme to provide women with continuity of carer throughout their pregnancy and through this project where able to appoint two midwives to support the safeguarding needs of the most vulnerable women and their babies. Feedback from mothers who have continuity of midwife is very positive.

Appendix D: Partner Updates

Following learning from local case reviews that we rolled out ICON, a coping with crying programme to support new parents and to reduce the prevalence of abusive head trauma in babies and small children. Initially we embedded it on the neonatal unit at Barnet hospital. Following direction from NHSE who were concerned about increased parental stress during lockdown we provided all new parents with information about ICON. Midwives would then talk to both parents about how to manage crying during a face to face visit at home on day five after delivery. We have now introduced ICON as part of the antenatal education.

We continually review our safeguarding training throughout the year but as a result of the covid pandemic have developed more training that we can deliver virtually or blend with eLearning.

We linked with the police to participate in the safe spaces scheme which encourages young people who attend Chase Farm Urgent Care Centre to identify areas on a map of the local area where they feel safe and where they feel unsafe.

Examples of excellent practice by an officer or team

Front line nursing team challenged a prison guard on his abusive behaviour (physical and emotional) to a patient from the local prison. The patient was in handcuffs and prison guard's duty was to stay with him at all times. Prisoners are usually escorted outside of the secure environment of the prison when necessary, under the proper authority and, during escort, are kept in secure custody at all times. The prison guard had a level of authority and statutory responsibility however, the staff members correctly identified that the prison guards actions were breaching our patient's human rights. The patient being in handcuffs and being under the custody of a prison guard did not cloud their assessment. They challenged the prison guard to protect the patient; immediately raised this to the senior managers, raised a complaint to the prison and reported to the local authority and police as an assault.

Safeguarding focus during Pandemic

- RFLNHSFT continuity plan in place and shared with the safeguarding partners to provide assurance that core responsibilities were being met.
- Maintained a safe staffing level within the safeguarding team even when staff volunteering in other areas.
- Ensured that midwives in the vulnerable women teams were not deployed to other areas.
- Supported safeguarding team to work remotely ensuring staff and partner agencies continue to have access to RFL NHS Foundation Trust's Safeguarding Team.
- Children and adult safeguarding training continued either virtual or face to face and training figures maintained.
- Enabling virtual access to the ward so other professionals, family members and relevant people have access to ward staff and patients when necessary.
- Adjustments in place to allow visitor to accompany or visit a person with a learning disability.
- Attendance at virtual child protection case conferences, strategy meetings and core groups.
- Provided safeguarding supervision to case holders, such as community midwives through virtual platforms which has been highly evaluated

Appendix D: Partner Updates

- Worked closely with other secondary and tertiary Health Trust to ensure inpatient services were maintained for children within NCL.

Waverley School

Safeguarding Enfield Annual Report information for 2020/21

School provided a food bank and called families regularly. Online learning was provided and school was open for children who were vulnerable.

Safeguarding Children

Children's joint service for disabled children and Waverley work closely to keep children safe. Health professionals including therapy and nursing team work well together to meet the needs of the children. Staff from cheviots were able to assist with a range of support e.g. food for respite.

Examples of excellent practice by an officer or team

School nurse Trish Noone worked really well with school leaders to find information about which pupils should be shielding.

During the Covid-19 Pandemic

During national lockdowns school staff worked with families to ensure they have everything they needed to keep the children safe. Ever changing guidance from the DfE was difficult to keep on top of however the support that Dudu Sher-Arami from public health Enfield has been amazing. She has been willing to join meetings with short notice. She was extremely patient and reassuring and able to advise school leaders on how best to keep the children and young people safe.





Website

www.enfield.gov.uk/safeguardingenfield



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London Borough of Enfield**Council****Meeting Date** **17 November 2021**

Subject: **GAMBLING ACT 2005 - GAMBLING POLICY & CASINO
RESOLUTION****Licensing Committee Chair:** Cllr Doug Taylor
Cabinet Member: Cllr George Savva
Executive Director: Sarah Cary**Key Decision:** **KD 5369**

Purpose of Report

1. The Council has a statutory duty, following public consultation, to publish its gambling policy under the Gambling Act 2005 every three years.
2. The existing policy and Local Area Profile was last approved by Council on 30 January 2019.
3. The Council may also, every three years, resolve not to issue casino premises licences under the Gambling Act 2005.
4. On 30 January 2019 Council resolved not to issue casino premises licences under the Gambling Act 2005.
5. The main changes to this policy (Annex 1) and Local Area Profile (Annex 2) reflect the changes to data and statistics. As the Local Area Profile is a separate document to the policy, it could be updated without the need for consultation i.e. to update statistics.
6. The Local Area Profile is a key document that highlights the areas of deprivation and inequality within the borough. The local area profile shows the location of facilities associated with children and vulnerable persons as well as some socio-economic indicators of potential vulnerability such as deprivation and unemployment. We expect the operators of gambling premises in Enfield to demonstrate they have had regard to our local area profile in preparing their own risk assessment of their premises and when they make licence applications.
7. The public consultation was undertaken on the proposed gambling policy and 'no casinos' resolution between 13 August and 8 October 2021 and the feedback is detailed below and in Annex 3.

Proposal(s)

8. To agree the changes to the Sixth Edition Gambling Policy.
9. To agree to continue the resolution to prevent casino operators from locating within the borough.

Reason for Proposal(s)

10. It is a statutory requirement to produce a review of the policy and to consult on it every 3 years.

Relevance to the Council Plan

11. The Gambling Policy directly contributes to two of the three priorities identified in, "A lifetime of opportunities for everyone – Enfield Council Plan 2020-2022."

- **Safe, healthy and confident communities**

12. The Gambling Policy and Local Area Plan provide guidance and statistics which highlights risks that gambling operators may face for new and existing premises. Those risks must be addressed in the operator's local risk assessment, with a view to supporting two of the licensing objectives, namely:

- Preventing gambling from being a source of crime or disorder, being associated with crime or disorder or being used to support crime;
- Protecting children and other vulnerable persons from being harmed or exploited by gambling.

13. Raising this awareness for licensing officers whose role it is to consider applications internally and externally (i.e. police licensing) and for operators means we can work together with a view to not increasing existing crime levels within communities.

An economy that works for everyone

14. The Gambling Policy reiterates the requirement of the Gambling Act 2005, that local authorities shall "aim to permit", whilst being mindful that the third licensing objective is met, namely:

- Ensuring that gambling is conducted in a fair and open way;

15. The Gambling Policy supports licence holders in creating a fair and equitable environment by advising on the council's view of advice and targeted enforcement. Enforcement action is always taken with regard to the council's enforcement policy. Legally compliant businesses will grow, develop and provide economic benefits that will hopefully result in increased employment of local residents.

Background

16. Under the Gambling Act 2005, the Local Authority must prepare a written Statement of Principles ('policy') which must be reviewed and adopted every 3 years. It sets out how the council will carry out its licensing functions whilst having regard to the guidance issued by the Gambling Commission and the promotion of the licensing objectives.
17. We are aware of frequent dissatisfaction from the public, businesses and Cllrs about the ability of Councils to moderate gambling premises or their licences in the borough despite them raising concerns about potential harm and impact from gambling premises. This has been expressed through recent representations to gambling premises applications, reviews of licences, the public consultation feedback on Enfield's Gambling Act policy and also in response to the Government's review of the Gambling Act. This stems from the overriding principle in the Gambling Act that Councils must 'aim to permit' gambling premises licence applications meaning they must be granted if they satisfy the licensing legislation and objectives, Gambling Commission Codes of Practice and the Council's statement of principles. Therefore, the Council is unable to take account in the Gambling Policy and in making decisions about licence applications of matters such as:
 - Moral Objections: we cannot take into account comments based on a dislike of gambling, or a general view that it is undesirable to allow gambling premises in the borough
 - Demand: we cannot take into account issues around the demand or need for gambling premises in the borough
 - Clustering of Premises: we cannot take into account views that there is already a high concentration of gambling premises in an area
18. Since January 2019 we have received 176 gambling applications, however only 6 (3.6%) of these were applications for new licences or for variation of existing licences which *could* have been subject to objections and *could* have been referred to the Licensing Sub-Committee.
19. The Licensing Team have for the first time this year, received objections against grant of a new adult gaming centre licence application and at Licensing Sub-Committee, that licence was refused. Also for the first time, we received two review applications to revoke bingo premises licences which were submitted by Interested Parties. Upon receipt of external expert gambling legal advice, those review applications were subsequently rejected. Additionally, the licence for the refused adult gaming centre was subsequently issued through an agreed consent order via the appeal process.
20. Since January 2019 we have not received any applications for casino licences in Enfield. We believe that our partner agencies (as well as local residents and businesses) are generally satisfied with the existing gambling policy relating to the no casino resolution.
21. The following information shows the number of licence applications made and current number of licences for gambling between January 2019 to 16 July 2021:

	No. of new Applications received since January 2019	No. of Closed Licences since January 2019	No. of Current Licences
Betting Premises Licence	0	8	71
Bingo Premises Licence	3	0	5
Adult Gaming Centre Licence	3	0	3
Family Entertainment Licence	0	0	0

22. It is noted that the new bingo and adult gaming centre licence applications are for premises which previously held betting premises licences. These gambling applications are notably on the increase, and this is common nationwide.
23. Since January 2019, every gambling premises has been inspected on a yearly basis and in general, overall compliance has been achieved, which includes operators producing independent local risk assessments to a satisfactory level. We have not received any complaints about open licensed premises in that time.
24. The licence holders have a duty to undertake in house test purchasing and notify us of the results: only successful refusals have been made.
25. The Gambling Act 2005 prohibits the Council from adopting any gambling policy to address the cumulative impact of betting shops 'clustering' together.
26. There has been a remarkable increase of community feeling towards current and new applications within the borough from both members and residents. The strength of feeling is averse to allowing such premises in the borough on moral grounds as well as crime and disorder concerns. Unless specific evidence can be directly related to a gambling premises, and the issues arising can be verified to be as a result of the licensed gambling activity, it is very difficult to refuse an application or review a licence.
27. The Council's Public Health Team have advised that the data they hold in relation to gambling is limited, so have recently embarked on a piece of work with the Safeguarding team and Kings College to pilot a gambling identification questionnaire, which aims to identify if a person has gambling issues and then getting them referred to the right support.
28. The Gambling Act 2005 and the Gambling Commission's statutory Guidance to licensing authorities have not made any significant changes since 2019,

therefore it is extremely limiting as to what changes can be made to the policy in this review.

29. A review of the Gambling Act was launched by the Government earlier this year which included a public consultation to which Enfield Council responded. We understand that the outcome of the review is not expected before 2023 at the earliest.

Local Area Profile

30. The Local Area Profile has been amended with updated statistics, including the removal of any referencing to wards, pending the ward boundary changes next May.
31. There has not been any significant changes to the hot spot areas previously identified as those potentially at higher risk of being exposed to gambling premises.
32. The updated Local Area Profile is produced in Annex 2.

Benchmarking/Review of other Council's Gambling Policies

33. A review was carried out with a number of London/neighbouring authorities to compare the proposed revision of Enfield's Policy with their policies. The purpose was to see if there were any approaches in their policies we could consider to strengthen our policy even further. From the responses received, authorities have been consistent and in line with the policy approach that Enfield are proposing.

Public Consultation

34. The public consultation took place between 13 August and 8 October 2021 (8 weeks).
35. Nine responses were received during the consultation period. The responses comprised the following:
- 5 were received from residents,
 - 1 was received from a ward councillor,
 - 3 were received from an organisations, one known to be from the Betting & Gaming Council (BGC), the new standards body for the UK's regulated betting and gaming industry.
36. A summary of the responses to the consultation is provided in Annex 3 and includes a summary of the amendments made to the proposed Gambling Act policy as a result of feedback received during the public consultation.
37. Public Health agreed with the "no casino" resolution and wanted to restrict the number of betting shops within an area.

38. The proposed policy was amended as considered necessary in the light of the feedback received and is detailed in Annex 1 and Annex 2 (the Local Area Profile document).

Main Considerations for the Council

39. To implement a policy within the remit of the gambling law and statutory guidance, and for officers and the Licensing Sub-Committee to adhere to that policy.

Safeguarding Implications

40. One of the Licensing Objectives in the Gambling Act is to protect children and vulnerable persons. The policy seeks to support this objective through identifying areas of vulnerability in the local area profile and expect gambling operators to have regard to this when they prepare their own risk assessments for their premises.

Public Health Implications

Covid

41. Gambling premises have been required by law to close throughout certain times during the Covid pandemic. This will impact on the outcome of the statistics gathered in relation to crime and disorder for example, compared to previous years.

Other

42. Whilst many people enjoy gambling without any adverse consequences it is estimated that 0.5% of the population are 'problematic gamblers' with 3.5% of the population adversely affected by its consequences. UK gamblers lose £13.8 billion per year and although local data is unavailable Enfield is unlikely to be an exception to this.

Equalities Impact of the Proposal

43. An equalities impact assessment has been undertaken and is attached in Annex 4.

Environmental and Climate Change Considerations

44. There are no discernible direct impacts on carbon emissions arising from the proposals in this report. In term of wider environmental impacts, these will most likely be related to the local issues which arise from the operation of certain types of premises.

Risks that may arise if the proposed decision and related work is not taken

45. The key risk is that the policy (statement of principles) and ‘no casino’ resolution are not approved and published by 30 January 2022 as required by the Gambling Act 2005. If not, the ‘no casino’ resolution will lapse and the Council will be non-compliant by not having a revised statement of principles in place.
46. Failure to approve the Policy and ‘no casino’ resolution would also pose a risk to the Council’s reputation.

Risks that may arise if the proposed decision is taken and actions that will be taken to manage these risks

47. None.

Financial Implications

48. Through the issuing of licences in line with the Gambling Act the Council receives circa. £50k per annum which contributes towards the operation of the licensing service. The recommended updates to the Gambling Act policy proposed in this report will not impact on the level of income that the Council currently receives.

Legal Implications

49. Under section 349 of the Gambling Act 2005 the council are required to review their Gambling Policy every 3 years.
50. It is possible for any person or organisation to challenge the policy adopted by judicial review.
51. Under section 166 of the Gambling Act 2005 the Council can adopt a “no casinos” resolution. If this is not renewed every 3 years it automatically lapses. Since the Gambling Act 2005 came into force the council has always chosen to adopt such a resolution. It is also possible for any person or organisation to challenge the “no casinos” resolution adopted by judicial review

Workforce Implications

52. There are no workforce implications.

Property Implications

53. There are no property implications.

Other Implications

54. None

Options Considered

55. There is no suitable alternative option. It is a legal requirement to consult on, and approve, a policy under the Gambling Act 2005 every 3 years.

Conclusions

56. To note the results of the public consultation.

57. To approve the Gambling Policy as per the draft in Annex 1.

58. To approve the 'no casino' resolution for a further 3 years.

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020 8132 2128

Date of report 18 October 2021

Appendices

- Annex 1: Draft Revision of Gambling Policy (6th Edition)
- Annex 2: Draft Revision of Local Area Profile (6th Edition)
- Annex 3: Results of the public consultation
- Annex 4: Equalities Impact Assessment

Background Papers

The following documents have been relied on in the preparation of this report:

None.

Annex 1

LONDON BOROUGH OF ENFIELD

GAMBLING ACT 2005

**STATEMENT
OF PRINCIPLES**

**Sixth Edition
31 January 2022**



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FOREWORD:

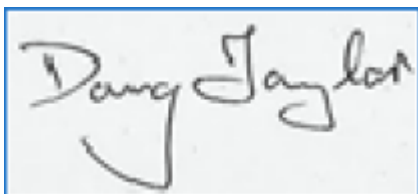
This is the latest review (the sixth) Statement of Licensing Policy produced by the London Borough of Enfield under the Gambling Act 2005 and it will be the basis for all gambling related licensing decisions taken by the Council as the Licensing Authority over the next three years commencing on 31 January 2022.

The Council remains concerned about the harmful impact of gambling, and we know that this concern is also shared by residents. Unlike alcohol control, where the harms are readily apparent in drunken behaviour and nuisance, problem gambling can be less visible and have devastating impacts on the person, their relationships, their family, on their health and cause significant debt. Enfield is particularly concerned that significantly higher risks are associated with gaming machines.

The Gambling Act requires that Licensing Authorities should aim to permit gambling (issue licences) where operators demonstrate that they meet the Gambling Commission Codes of Practice, satisfy the Council's Statement of Licensing Policy and the licensing objectives. Where there is evidence that these requirements are not being met, we will use our powers; such as imposition of licence conditions, to moderate the risks to these licensing objectives.

We have revised our local area profile of the borough, which is now presented in a supplementary document to this Policy. Enfield borough experiences significant areas of deprivation and inequality which the Council is determined to address. The local area profile shows the location of facilities associated with children and vulnerable persons as well as some socio-economic indicators of potential vulnerability such as deprivation and unemployment. We expect the operators of gambling premises in Enfield to demonstrate they have had regard to our local area profile in preparing their own risk assessment of their premises and when they make licence applications.

This Policy will be kept under review and it will be amended when significant issues arise that make change necessary. The Council will seek through the licensing process and the decisions it takes, to make Enfield a safe and welcoming place for both residents and visitors to enjoy.

A handwritten signature in black ink, reading "Doug Taylor", enclosed in a blue rectangular border. The signature is written in a cursive style.

Councillor Doug Taylor
Chairman, Licensing Committee

Statement of Licensing Policy

1.1 Introduction

1.1.1 The Gambling Act 2005 requires the Council to prepare and publish a “Statement of Licensing Policy” that sets out the principles the Council proposes to apply in exercising its licensing functions when dealing with applications for Premises Licences, as required by the Act. Appendix A provides more information on the definitions used of terms used within this Statement.

1.1.2 This Policy Statement takes effect on 31st January 2021. This Licensing Authority will update and publish a new Licensing Policy whenever necessary but in any case within 3 years of the date of this Policy, and will fully consult with partners, trade associations and residents groups as appropriate at that time, and any representations received will be considered at that time.

1.1.3 However where updates are required due to changes in national legislation, statutory guidance or contact details the council reserves the right to amend this policy without consultation where it is necessary to ensure the policy reflects national legislation or statutory guidance.

1.1.4 In producing the final Policy Statement the Council declares that it has had regard to the licensing objectives of the Gambling Act 2005, the Guidance to Licensing Authorities issued by the Gambling Commission, any codes of practice and any responses from those consulted on the Policy Statement.

1.1.5 The Human Rights Act 1998 (as amended) incorporates the European Convention on Human Rights and makes it unlawful for a local authority to act in a way that is incompatible with such a right. The council will have regard to the Human Rights Act when considering any licensing issues, and particularly in respect of the way in which applications are considered and enforcement activities are carried out.

1.1.6 The council acknowledges that it may need to depart from this Policy and from the guidance issued under the Act in individual and exceptional circumstances, and where the case merits such a decision in the interests of the promotion of the licensing objectives. Any such decision will be taken in consultation with the appropriate legal advisors for the Licensing Authority, and the reasons for any such departure will be fully recorded.

1.2 Profile of London Borough of Enfield

1.2.1 The profile of London Borough of Enfield is found within the separate Local Area Profile document which supplements this Policy.

1.3 Objectives

1.3.1 In exercising most of its functions under the Gambling Act 2005 the Council, as the Licensing Authority, must have regard to the following licensing objectives:

- **Preventing gambling from being a source of crime or disorder, being associated with crime or disorder or being used to support crime;**
- **Ensuring that gambling is conducted in a fair and open way;**
- **Protecting children and other vulnerable persons from being harmed or exploited by gambling.**

1.3.2 It should be noted that the Gambling Commission has stated: “The requirement in relation to children is explicitly to protect them from being harmed or exploited by gambling”.

1.3.4 The Council is aware that, as per Section 153, in making decisions about premises licences and temporary use notices it should aim to permit the use of premises for gambling insofar as it thinks it is:

- **In accordance with any relevant code of practice issued by the Gambling Commission;**
- **In accordance with any relevant guidance issued by the Gambling Commission;**
- **Reasonably consistent with the licensing objectives;**
- **In accordance with the Council’s Statement of Licensing Policy. In particular, the Council requires operators to take account of the local area profile of the borough contained within this policy.**

1.4 The Licensing Authority Functions

1.4.1 The Council is required under the Act to:

- Be responsible for the licensing of premises where gambling activities are to take place by issuing Premises Licences;
- Issue Provisional Statements;
- Regulate members’ clubs who wish to undertake certain gaming activities via issuing Club Gaming Permits and/or Club Machine Permits;
- Issue Club Machine Permits to Commercial Clubs;
- Grant permits for the use of certain lower stake gaming machines at unlicensed family entertainment centres;
- Receive notification from alcohol licensed premises (under the Licensing Act 2003) of the use of two or fewer gaming machines;
- Issue Licensed Premises Gaming Machine Permits for premises licensed to sell/supply alcohol for consumption on the licensed premises, under the Licensing Act 2003, where there are more than two machines;
- Register small society lotteries below prescribed thresholds;

- Issue Prize Gaming Permits;
- Receive and endorse Temporary Use Notices;
- Receive Occasional Use Notices;
- Provide information to the Gambling Commission regarding details of licences issued (see section below on information exchange);
- Maintain registers of the permits and licences that are issued under these functions.

1.4.2 It should be noted that local licensing authorities are not involved in licensing remote gambling at all, which is regulated by the Gambling Commission via Operator Licences.

1.4.3 The Council recognises that the licensing function is only one means of promoting delivery of the three objectives and should not therefore be seen as a means for solving all problems within the community. The Council will therefore work in partnership with neighbouring authorities, Metropolitan Police Service, the Community Safety Partnership, local businesses, local people and those involved in child protection to promote the licensing objectives as outlined. In addition, the Council recognises its duty under Section 17 of the Crime and Disorder Act 1998, with regard to the prevention of crime and disorder.

1.5 Consultation

1.5.1 The Council has consulted widely upon this Statement before finalising and publishing. A list of those persons consulted is provided below, in line with the Act and the Gambling Commission's Guidance.

- The Chief Officer of Police;
- The Fire Authority;
- One or more persons who appear to the authority to represent the interest of persons carrying on gambling businesses in the authority's area;
- One or more persons who appear to the authority to represent the interests of persons likely to be affected by the exercise of the authority's functions under the Gambling Act 2005;
- Departments (including Responsible Authorities) within the Council with an interest in the licensing of gambling;
- Local Safeguarding Children Board;
- Councillors;
- Other organisations as appear to be affected by licensing matters covered by this Statement;
- H.M. Revenue and Customs;
- Our neighbouring boroughs (London Borough of Haringey, London Borough of Barnet, London Borough of Waltham Forest, Epping Forest, Broxbourne, Hertsmere, Welwyn Hatfield).

1.5.2 The Statement was also available on the Council's website (www.enfield.gov.uk) and copies were provided at Civic Centre. The full list of

comments made and the consideration by the Council of those comments is available on the Council's website.

1.5.3 Consultation took place between 13 August 2021 and 8 October 2021 and, as far as practicable, the Council followed the Consultation Principles issued by the government (last updated in 2018) which is available at <https://www.gov.uk/government/publications/consultation-principles-guidance>

1.5.4 This policy was approved at a meeting of the Full Council on 17 November 2021 and was published on the Council's website by 31 January 2022.

1.6 Responsible Authorities

1.6.1 In exercising the Council's powers under Section 157(h) of the Act to designate, in writing, a body that is competent to advise the Council about the protection of children from harm, the following principles have been applied:

- The need for the body to be responsible for an area covering the whole of the licensing authority's area; and
- Answerable to democratically elected Councillors, rather than to any particular vested interest group.

1.6.2 In accordance with the Gambling Commission's Guidance this Council, as Licensing Authority, designates the Council's Director of Children's Services for this purpose.

1.6.3 The following are Responsible Authorities:

- The Gambling Commission
- Her Majesty's Commissioners of Customs and Excise (now known as Her Majesty's Revenue & Customs)
- The Metropolitan Police Service
- The London Fire and Emergency Planning Authority
- The Council, as Licensing Authority
- The Council, as Planning Authority
- The Council's Director of Children's Services
- The Council's Environmental Health Service
- The Council's Public Health Service
- Any other person or body who may be prescribed by regulations made by the Secretary of State for Culture, Media and Sport ('the Secretary of State')

1.6.4 Contact details of all the Responsible Authorities under the Gambling Act 2005 are available on the Council's website.

1.7 Interested Parties

1.7.1 Interested Parties can make representations about licence applications or apply for a review of an existing licence based on the three licensing objectives as

detailed in paragraph 1.3 of this Policy Statement. An Interested Party is someone who in the opinion of the Council: -

- a) Lives sufficiently close to the premises to be likely to be affected by the authorised activities; and/or
- b) Has business interests that might be affected by the authorised activities; or
- c) Who Represent persons who satisfy paragraph (a) or (b).

1.7.2 The following are not valid reasons to reject applications for premises licences:

- a) Moral objections to gambling
- b) The 'saturation' of gambling premises unless there is evidence that the premises poses a risk to the licensing objectives in that locality
- c) A lack of 'demand'
- d) Whether the proposal is likely to receive planning or building regulations consent

1.7.3 The Council has not specified a distance from the premises within which a person must live or have a business interest in order to be considered an interested party and will judge each case on its merits. The factors the Council may take into account when determining what 'sufficiently close' means for a particular application include:

- The size and nature of the premises
- The distance of the premises from the person making the representation, and the nature of their interest
- The potential impact of the premises and its catchment area

1.7.4 The term 'has business interests' will be given the widest possible interpretation in accordance with paragraph 1.7.3 and include partnerships, charities, faith groups and medical practices.

1.7.5 Interested Parties may include trade associations and trade unions, and residents' and tenants' associations. The Council will not however generally view these bodies as Interested Parties unless they have a member who can be classed as an interested person i.e. lives sufficiently close to the premises to be likely to be affected by the authorised activities and/or has business interests that might be affected by the authorised activities.

1.7.6 Unless the person making the representation is a locally elected councillor or Member of Parliament, the London Borough of Enfield as licensing authority will require written evidence that they represent identified interested parties. A letter from one of these persons will be sufficient.

1.7.7 If individuals wish to approach Councillors to ask them to represent their views then care should be taken that the Councillors are not part of the Licensing Committee dealing with the licence application.

1.8 Exchange of Information

1.8.1 The Council will work closely with the Gambling Commission, the Metropolitan Police and with Responsible Authorities where there is a need to exchange information on specific premises. For example, where the Commission makes observations and representations on the suitability of the applicant for a premises licence or any other aspect of the application, the Commission and Council shall discuss matters relating to that application and the appropriate action to take.

1.8.2 Furthermore, the Council shall continue to submit annual returns to the Commission as they are an important source of information that can assist both in improving their work as risk-based regulators. Both parties will work together to ensure that the returns process is managed effectively, and the Council shall ensure that the information on the returns is accurate. It is noted however that the Commission will minimise the burden imposed on the Council by keeping its data requests to an absolute minimum.

1.8.3 The principle that the Council will apply when exchanging information will be to act in accordance with the provisions of the Gambling Act 2005 which includes the provision that the Data Protection Act 2018 and General Data Protection Regulations 2018 will not be contravened. The Council will also have regard to any Guidance issued by the Gambling Commission on this matter as well as any relevant regulations issued by the Secretary of State under the powers provided in the Gambling Act 2005.

1.8.4 Where relevant, information will be protected and the confidentiality of those making representations will be maintained. Information will be shared between the Responsible Authorities and Gambling Commission.

1.9 Enforcement

1.9.1 The Council's principles are that it will be guided by the Gambling Commission's Guidance to local authorities, the Regulators Code and the council's enforcement policy. It will endeavour to be:

- Proportionate: regulators should only intervene when necessary, remedies should be appropriate to the risk posed, and costs identified and minimised;
- Accountable: regulators must be able to justify decisions, and be subject to public scrutiny;
- Consistent: rules and standards must be joined up and implemented fairly;
- Transparent: regulators should be open, keep regulations simple and user friendly; and
- Targeted: regulation should be focused on the problem and minimise side effects.

1.9.2 As per the Gambling Commission's Guidance to Licensing Authorities, the Council will endeavour to avoid duplication with other regulatory regimes so far as possible.

1.9.3 The Gambling Commission have highlighted that local authorities in general are likely to receive very few, or no complaints about gambling. Unlike other regulated areas, such as alcohol, gambling is much less visible as a concern for residents. As a result, the Gambling Commission advises the Council to proactively conduct inspections, to build up the picture of whether a premises can establish true compliance, and can assess whether the necessary protections, especially for the young and vulnerable are in place and working effectively.

1.9.4 The Council's Inspection Programme requires all new licensed premises to be inspected shortly after the licence has been issued, and every premises should expect at least one inspection per year. Inspections of premises are also undertaken if complaints are received, if variation applications are received or there is some other intelligence that suggests an inspection is appropriate. Compliance will be checked in a daytime or evening inspection. Where a one-off event takes place under a Temporary Use Notice or Occasional Use Notice, the Council may also carry out inspections to ensure the Licensing Objectives are being promoted.

1.9.5 High-risk premises are those premises that have a history of complaints, a history of non-compliance and require greater attention. The Council will operate a lighter touch in respect of low-risk premises so that resources are more effectively targeted to problem premises. We will also target enforcement towards illegal gambling as it is potentially higher risk/harm due to the lack of regulation and oversight that legitimate licensed gambling is subject to.

1.9.6 The Council continues to adopt and implement a risk-based inspection programme, based on:

- The licensing objectives;
- Relevant codes of practice;
- Guidance issued by the Gambling Commission, in particular at Part 36;
- The principles set out in this Statement of Licensing Policy.
- The council's enforcement policy.

1.9.7 The main enforcement and compliance role for this Council in terms of the Gambling Act 2005 is to ensure compliance with the Premises Licences and other permissions, which it authorises. The Gambling Commission is the enforcement body for the Operator and Personal Licences. Concerns about manufacture, supply or repair of gaming machines are not dealt with by the Council but should be notified to the Gambling Commission.

1.9.8 The council will take account of the Gambling Commissions guidance document issued in February 2015 (or any subsequent amendments) 'Approach to Test Purchasing' when considering making test purchases at gambling premises. The council will also follow its own policies and procedures regarding the use of underage test purchasers.

1.9.9 The Council also keeps itself informed of developments as regards the work of the

Office for Product Safety & Standards in its consideration of the regulatory functions of local authorities.

1.9.10 The Council's enforcement policy details the licensing authority's approach to inspections, criminal investigations and prosecutions and is available on the Council's website.

1.10 Fundamental Rights

1.10.1 Under the terms of the Act any individual/company may apply for a variety of permissions and have their applications considered on their individual merits. Equally, any Interested Party or Responsible Authority has a right to make relevant representations on an application or to seek a review of a licence or certificate where provision has been made for them to do so in the Act.

1.10.2 Applicants and those making relevant representations in respect of applications to the Council have a right of appeal to the Magistrates Court against the decisions of the Council.

1.11 Other Regulatory Regimes

1.11.1 When considering any application, the Council will avoid duplication with other regulatory regimes so far as possible. Therefore, the Council will not attach conditions to a licence unless they are considered reasonable and proportionate to the use of premises for gambling consistent with the licensing objectives.

1.12 Gambling Prevalence and Problem Gambling

1.12.1 The Council are mindful of the report published by NatCen in 2017¹ about gambling behaviours from the findings of the 2015 English and Scottish Health Surveys and Welsh Omnibus.

1.12.2 The Council are also aware of the GamCare annual review (2018-2019)² which presents gambling data.

¹ <http://www.natcen.ac.uk/media/1464625/gambling-behaviour-in-great-britain-2015.pdf>.”

² <https://d1ygf46rsya1tb.cloudfront.net/prod/uploads/2019/12/GamCare-Annual-Report-2018.19-FINAL-11.12.19.pdf>

2. Premises Licence

2.1 General Principles

2.1.1 Premises Licences are subject to the requirements set out in the Gambling Act 2005 and regulations, as well as specific mandatory and default conditions, which are detailed in regulations issued by the Secretary of State. Licensing authorities are able to exclude default conditions and also attach others, where it is believed to be appropriate.

2.1.2 Applicants for premises licences will have already obtained an Operators Licence from the Gambling Commission and be subject to the Licensing Conditions and Codes of Practice before applying for a premises licence. The Council is aware that in making decisions about Premises Licences it should aim to permit the use of premises for gambling insofar as it thinks it: -

- In accordance with any relevant code of practice issued by the Gambling Commission;
- In accordance with any relevant guidance issued by the Gambling Commission;
- Reasonably consistent with the licensing objectives;
- In accordance with this Policy Statement (including the local area risk profile);

2.1.3 The Council will also consider:

- Information from the applicants as to whether any licensing objectives concerns can be mitigated or overcome;
- Each application on its own merits with regard to all the above considerations.

2.1.4 It is appreciated that as per the Gambling Commission's Guidance for local authorities "moral objections to gambling are not a valid reason to reject applications for Premises Licences" and also that unmet demand is not a criterion for a licensing authority.

2.1.5 The Licence Conditions and Code of Practice (LCCP) issued by the Gambling Commission (version updated October 2020) places further onus on premises to complete a risk assessment based on code 10, the social responsibility code of the Code of practice provisions. The council will have regard to this code when considering applications. This is covered in detail in Section 6 of this statement.

Definition of "Premises":

2.1.6 Premises is defined in the Act as "any place". Section 152 therefore prevents more than one premises licence applying to any place. But a single building could be subject to more than one premises licence, provided they are for different parts of the building and the different parts of the building can be reasonably regarded as being different premises. This approach has been taken to allow large, multiple unit premises such as a pleasure park, pier, track or shopping mall to obtain discrete premises licences, where appropriate safeguards are in place. However, licensing authorities should pay particular attention if there are issues about sub-divisions of a

single building or plot and should ensure that mandatory conditions relating to access between premises are observed.

2.1.7 The Gambling Commission states in its Guidance to Licensing Authorities (7.5) that: “In most cases the expectation is that a single building/plot will be the subject of an application for a licence, for example, 32 High Street. But, that does not mean that 32 High Street cannot be the subject of separate premises licences for the basement and ground floor, if they are configured acceptably. Whether different parts of a building can properly be regarded as being separate premises will depend on the circumstances. The location of the premises will clearly be an important consideration and the suitability of the division is likely to be a matter for discussion between the operator and the licensing officer.”

2.1.8 However, the Commission does not consider that areas of a building that are artificially or temporarily separated, for example, by ropes or moveable partitions, can properly be regarded as different premises.”

2.1.9 The Council takes particular note of the Gambling Commission’s Guidance (7.32) for local authorities which states that licensing authorities should take particular care in considering applications for multiple licences for a building and those relating to a discrete part of a building used for other (non-gambling) purposes. In particular, they should be aware of the following –

- The third licensing objective seeks to protect children from being harmed by gambling. In practice that means not only preventing them from taking part in gambling, but also preventing them from being in close proximity to gambling. Therefore, premises should be configured so that children are not invited to participate in, have accidental access to or closely observe gambling where they are prohibited from participating;
- Entrances to and exits from parts of a building covered by one or more premises licences should be separate and identifiable so that the separation of different premises is not compromised, and people do not “drift” into a gambling area. In this context it should normally be possible to access the premises without going through another licensing premises or premises with a permit;
- Customers should be able to participate in the activity named on the premises licence.

2.1.10 The Guidance (7.33) also gives a list of factors, which the licensing authority should be aware of, which may include:

- Do the premises have a separate registration for business rates?
- Is the Premises’ neighbouring premises owned by the same person or someone else?
- Can each of the premises be accessed from the street or a public passageway?
- Can the premises only be accessed from any other gambling premises?

2.2 Appropriate Licence Environment

2.2.1 The Guidance to Local Authorities and the Licence Conditions and Codes of Practice (LCCP - version updated October 2020), set out additional matters, including prescribing restrictions on gambling activities on premises, that the council should take into account when considering licence applications for premises licences.

2.2.2 Where gambling facilities are provided at premises as a supplementary activity to the main purpose of the premises; e.g. motorway service areas and shopping malls, the council will expect the gambling area to be clearly defined to ensure that customers are fully aware that they are making a choice to enter into the gambling premises, and that the premises is adequately supervised at all times.

2.2.3 The Council will consider these and any other relevant factors in making its decision, depending on all the circumstances of the case.

2.2.5 The Gambling Commission's Guidance (7.23) for relevant access provisions for each premises type is reproduced in Appendix B.

2.3 Premises "ready for gambling"

2.3.1 The Guidance states that a licence to use premises for gambling should only be issued in relation to premises that the licensing authority can be satisfied are going to be ready to be used for gambling in the reasonably near future, consistent with the scale of building or alterations required before the premises are brought into use.

2.3.2 The provisional statement procedure may be used where construction of a premises is not yet complete, or if they need alteration, or if the applicant does not yet have a right to occupy them. In the latter case, it is not possible to make a premises licence application and the provisional statement procedure must be used.

2.3.3 In deciding whether a premises licence can be granted where there is outstanding construction or alteration works at a premises, the Council will determine applications on their merits, applying a two-stage consideration process:

- First, whether the premises ought to be permitted to be used for gambling;
- Second, whether appropriate conditions can be put in place to cater for the situation that the premises are not yet in the state in which they ought to be before gambling takes place.

2.3.4 Applicants should note that this authority is entitled to decide that it is appropriate to grant a licence subject to conditions, but it is not obliged to grant such a licence.

2.3.5 More detailed examples of the circumstances in which such a licence may be granted can be found in the Guidance.

2.4 Other Considerations

Location:

2.4.1 The Council is aware that demand issues cannot be considered with regard to the location of premises but that considerations in terms of the licensing objectives are relevant to its decision making. As per the Gambling Commission's Guidance for local authorities, the Council will pay particular attention to the protection of children and vulnerable persons from being harmed or exploited by gambling, as well as issues of crime and disorder.

2.4.2 The Council will give careful consideration to premises located close to:

- Schools
- Youth clubs
- Recreational areas, particularly those catering for young persons
- Establishments providing care for children and young adults
- Establishments providing care for persons with learning difficulties or mental health issues
- Establishments used or occupied by gambling addicts
- Establishments likely to attract or house population groups likely to be vulnerable to risk of problematic gambling.

2.4.3 The Council has produced a local area profile including the information listed in 2.4.2 above; further details can be seen in the separate Local Area Profile document attached to this Policy.

2.4.4 It should be noted that any such policy does not preclude any application being made and each application will be decided on its merits, and operators are encouraged to provide information in their application that demonstrates they have existing policies and procedures to mitigate any risks.

2.4.5 Applicants will be expected to prepare risk assessments based on the location and identify risk controls (taking account of the local area risk profile produced by the Council), the type of gambling operation and the design of the premises. For further details see the separate Local Area Profile document attached to this Policy.

2.4.6 The Council will in all cases consider what measures may be needed to mitigate risk to the licensing objectives. In doing so it will take account of the information provided in the application by the operator, the local area profile, the risk assessment and whether any additional conditions are required to mitigate risk by reference to the LCCP produced by the Gambling Commission.

Planning:

2.4.7 The Gambling Commission Guidance to Licensing Authorities states:

- In determining applications, the licensing authority should not take into consideration matters that are not related to gambling and the licensing

objectives. One example would be the likelihood of the applicant obtaining planning permission or building regulations approval for their proposal.

2.4.8 The Council will not take into account irrelevant matters as per the above guidance. In addition, the Council notes the following excerpt from the Guidance:

- When dealing with a premises licence application for finished buildings, the licensing authority should not take into account whether those buildings must comply with the necessary planning or building consents. Those matters should be dealt with under relevant planning control, building and other regulations, and must not form part of the consideration for the premises licence. Section 210 of the 2005 Act prevents licensing authorities taking into account the likelihood of the proposal by the applicant obtaining planning or building consent when considering a premises licence application. Equally the grant of a gambling premises licence does not prejudice or prevent any action that may be appropriate under the law relating to planning or building.

2.5 Duplication with other Regulatory Regimes

2.5.1 The Council seeks to avoid any duplication with other statutory/regulatory systems where possible, including planning. The Council will not consider whether a licence application is likely to be awarded planning permission or building regulations approval in its consideration of it. It will though listen to, and consider carefully, any concerns about conditions, which are not able to be met by licensees due to planning restrictions, should such a situation arise.

2.5.2 When dealing with a premises licence application for finished buildings, the Council will not take into account whether those buildings have to comply with the necessary planning or building consents. Fire or health and safety risks will not be taken into account, as these matters are dealt with under relevant planning control, buildings and other regulations and must not form part of the consideration for the premises licence.

2.6 Licensing Objectives

2.6.1 Premises licences granted must be reasonably consistent with the licensing objectives. With regard to these objectives, the Council has considered the Gambling Commission's Guidance to licensing authorities and some comments are made below.

Preventing gambling from being a source of crime or disorder, being associated with crime or disorder or being used to support crime:

2.6.2 The Council is aware that the Gambling Commission takes a leading role in preventing gambling from being a source of crime. The Gambling Commission's Guidance does, however, envisage that licensing authorities should pay attention to the proposed location of gambling premises in terms of this licensing objective. For

example, in considering an application for a premises licence or permit that is in an area noted for particular problems with disorder, organised criminal activity etc, the Council will consider what, if any, controls (e.g. conditions) might be appropriate to prevent those premises being associated with or used to support crime. These might be conditions identified by the operator's own risk assessment or conditions the Council consider appropriate due to the local area profile. The Council is aware of the distinction between disorder and nuisance. Issues of nuisance cannot be addressed via the Gambling Act provisions. For example, noise from music, gambling machines or customers from a gambling premises cannot be addressed under the Gambling Act but can using other legislation. This licensing objective is concerned with crime or disorder. Examples of this are if the premises were associated with gang activity, violence, drugs, or organised crime.

Ensure that gambling is conducted in a fair and open way:

2.6.3 The Council has noted that the Gambling Commission states that it does not expect licensing authorities to become concerned with ensuring that gambling is conducted in a fair and open way, as this will be addressed via operating and personal licences. If the Council suspect gambling is not being conducted in a fair and open way, it would be brought to the attention of the Gambling Commission. There is, however, more of a role with regard to tracks, which is explained in more detail in the "tracks" section.

Protecting children and other vulnerable persons from being harmed or exploited by gambling:

2.6.4 The Council has noted the Gambling Commission's Guidance for local authorities states that this objective means preventing children from taking part in gambling (as well as restriction of advertising so that gambling products are not aimed at or are, particularly attractive to children). The Council will, therefore, consider, as suggested in this Guidance, whether specific measures are required at particular premises, with regard to this licensing objective. Appropriate measures may include supervision of entrances/machines, segregation of areas, etc.

2.6.5 The Council is also aware of the Codes of Practice, which the Gambling Commission issues as regards this licensing objective, in relation to specific premises.

2.6.6 As regards the term "vulnerable persons" it is noted that the Gambling Commission does not seek to offer a definition but states that "it will for regulatory purposes assume that this group includes people who gamble more than they want to; people who gamble beyond their means; and people who may not be able to make informed or balanced decisions about gambling due to, for example, mental health, a learning disability or substance misuse relating to alcohol or drugs". The Council will consider this licensing objective on a case by case basis.

2.6.7 Geofutures Gambling and Place research for Westminster and Manchester City Councils³ identified the following groups as vulnerable to gambling-related harm:

- children, adolescents and young adults (including students)
- people with mental health issues, including those experiencing substance abuse issues (problem gambling is often 'co-morbid' with these substance addictions)
- individuals from certain minority ethnic groups, such as Asian/Asian British, Black/Black British and Chinese/other ethnicity
- the unemployed
- the homeless
- those with low intellectual functioning
- problem gamblers seeking treatment
- people with financially constrained circumstances
- those living in deprived areas.

2.6.8 Section 7 of the Gambling Commission Guidance to Local Authorities sets out considerations that an operator must make in order to protect children, young people and vulnerable persons from accessing gambling premises.

2.6.9 The Licence Conditions and Codes of Practice (LCCP, Code 3.2) prescribe how operators must prevent children from using age restricted gaming or gambling activities, particularly where gaming machines are licensed.

2.6.10 The council will expect all operators to have policies and procedures in place as required by the LCCP codes on social responsibility to cover all aspects of the code, in particular staff training records and self-exclusion records.

2.6.11 Further provisions with regard to self-exclusion and marketing are included in the social responsibility code. The council will take all conditions and codes into account when considering applications or performing enforcement activities.

2.6.12 See section 6 of this policy statement for further details and on the council's requirements in relation to the LCCP.

2.7 Bet-Watch Enfield

2.7.1 The council encourage and will support local operators to create and maintain an information sharing network to discuss issues of problem gamblers that are identified. This will also be an opportunity for operators to discuss issues with the licensing officers and Metropolitan Police.

2.8 Conditions

2.8.1 Premises applying for licences are already subject to mandatory and default conditions. Additional conditions would only be imposed where there is clear evidence to the risk to the licensing objectives in the circumstances of a particular

³ 'Exploring area-based vulnerability to gambling-related harm: Developing the gambling-related harm risk index' and 'Exploring area-based vulnerability to harm: who is vulnerable?', Heather Wardle, Gambling and Place Research Hub, Geofutures, 9th February 2016'

case such that the mandatory and default conditions are needed to be supplemented.

2.8.2 Any conditions attached to licences will be proportionate and will be:

- Relevant to the need to make the proposed building suitable as a gambling facility;
- Directly related to the premises (including the locality and any identified local risks) and the type of licence applied for;
- Fairly and reasonably related to the scale and type of premises; and
- Reasonable in all other respects.

2.8.3 Decisions upon individual conditions will be made on a case by case basis, although there will be a number of measures the Council will consider utilising should there be a perceived need, such as the use of supervisors, appropriate signage for adult only areas, etc. There are specific comments made in this regard under some of the licence types below. The Council will also expect the licence applicant to offer his/her own suggestions as to ways in which the licensing objectives can be met effectively.

2.8.4 In order to inform such suggestions, applicants will be expected to prepare risk assessments based on the location and range of clientele of the premises, and to take account of any local area profile produced by the Council. For further details see paragraph 6.3 below.

2.8.5 The Council will in all cases consider what measures may be needed to mitigate risk to the licensing objectives. In doing so it will take account of the information provided in the application by the operator, the local area profile, the risk assessment and whether any additional conditions are required to mitigate risk by reference to the LCCP.

2.8.6 The Council will also consider specific measures, which may be required for buildings, which are subject to multiple premises licences. Such measures may include the supervision of entrances; segregation of gambling from non-gambling areas frequented by children; and the supervision of gaming machines in non-adult gambling specific premises in order to pursue the licensing objectives.

2.8.7 The Council will have consideration for the Gambling Commission's "Code of practice for gaming machines in clubs and premises with an alcohol licence" ³ also ensure that where category C or above machines are on offer in premises to which children are admitted:

- All such machines are located in an area of the premises which is separated from the remainder of the premises by a physical barrier which is effective to prevent access other than through a designated entrance;
- Only adults are admitted to the area where these machines are located;
- Access to the area where the machines are located is supervised;
- The area where these machines are located is arranged so that it can be observed by the staff or the licence holder; and

- At the entrance to and inside any such areas there are prominently displayed notices indicating that access to the area is prohibited to persons under 18.

2.8.8 The Council is aware that tracks may be subject to one or more than one premises licence, provided each licence relates to a specified area of the track. As per the Gambling Commission's Guidance, this Council will consider the impact upon the second and third licensing objectives and the need to ensure that entrances to each type of premises are distinct and that children are excluded from gambling areas where they are not permitted to enter.

2.8.9 It is noted that there are conditions, which the Council cannot attach to premises licences, which are:

- Any condition on the premises licence which makes it impossible to comply with an operating licence condition;
- Conditions relating to gaming machine categories, numbers, or method of operation;
- Conditions which provide that membership of a club or body be required (the Gambling Act 2005 specifically removes the membership requirement for casino and bingo clubs and this provision prevents it being reinstated); and
- Conditions in relation to stakes, fees, winning or prizes.

2.9 Door Supervisors

2.9.1 The Gambling Commission advises in its Guidance to licensing authorities that if it is concerned that a premises may attract disorder, or be subject to attempts at unauthorised access (e.g. by children and young persons) then it may require that the entrances to the premises are controlled by a door supervisor, and is entitled to impose a premises licence to this effect.

2.9.2 Where it is decided that supervision of entrances/machines is appropriate for particular cases, a consideration of whether these need to be SIA licensed or not will be necessary. It will not be automatically assumed that they need to be licensed as the statutory requirements for different types of premises vary.

2.10 Adult Gaming Centres

2.10.1 The Council will specifically have regard to the need to protect children and vulnerable persons from harm or being exploited by gambling and will expect the applicant to satisfy the Council that there will be sufficient measures to, for example, ensure that under 18-year olds do not have access to the premises.

2.10.2 Where gambling facilities are provided at premises as a supplementary activity to the main purpose of the premises; e.g. motorway service areas and shopping malls, the council will expect the gambling area to be clearly defined to ensure that customers are fully aware that they are making a choice to enter into the gambling premises and that the premises is adequately supervised at all times.

2.10.3 This Council may consider measures to meet the licensing objectives such as:

- Proof of age schemes
- CCTV
- Supervision of entrances/machine areas
- Physical separation of areas
- Location of entry
- Notices/signage
- Specific opening hours
- Self-exclusion schemes
- Provision of information leaflets/helpline numbers for organisations such as GamCare
- ATMs and cash terminals located separately from gaming machines and displaying GamCare Helpline information.

2.10.4 This list is not mandatory, nor exhaustive, and is merely indicative of example measures.

2.11 (Licensed) Family Entertainment Centres

2.11.1 The Council will specifically have regard to the need to protect children and vulnerable persons from harm or being exploited by gambling and will expect the applicant to satisfy the Council, for example, that there will be sufficient measures to ensure that under 18-year olds do not have access to the adult only gaming machine areas.

2.11.2 The Council may consider measures to meet the licensing objectives such as:

- Proof of Age Schemes
- CCTV
- Supervision of entrances/machine areas
- Physical separation of areas
- Location of entry
- Notices/signage
- Specific opening hours
- Self-exclusion schemes
- Provision of information leaflets/helpline numbers for organisations such as GamCare
- ATMs and cash terminals located separately from gaming machines and displaying GamCare Helpline information
- Measures/training for staff on how to deal with children on the premises, for example, suspected truancy from school.

2.11.3 This list is not mandatory, nor exhaustive, and is merely indicative of example measures.

2.12 Casinos

2.12.1 On 17 November 2021 the full Council of the London Borough of Enfield, in accordance with Section 166 to the Gambling Act 2005, passed a 'no casino' resolution. The basis for the resolution was:

- Demographics of the borough
- Possible risks to the licensing objective of protection of children and vulnerable adults
- Possible links between deprivation and problem gambling
- Findings of research on casino gambling
- Responses from the statutory public consultation on the statement of principles on whether the council should make a 'no casinos' resolution

2.12.2 The resolution came into effect on 31 January 2022 and will remain in force for three years, when a further 'no casino' resolution may be passed.

2.12.3 There is no right of appeal against this resolution.

2.12.4 Potential licence applicants should note that no applications for casino premises licences will be considered. Any applications received will be returned with a notification that a 'no-casino' resolution is in place.

2.12.5 The Council has power to revoke the 'no casino' resolution, should it wish to do so at a future date.

2.13 Bingo Premises

2.13.1 This Council notes that the Gambling Commission's Guidance states: Licensing Authorities will need to satisfy themselves that bingo can be played in any bingo premises for which they issue a premises licence. This will be a relevant consideration where the operator of an existing bingo premises applies to vary their licence to exclude an area of the existing premises from its ambit and then applies for a new premises licence, or multiple licences, for that or those excluded areas.

2.13.2 The Council is aware that a holder of bingo premises licences may make available for use of a number of category B gaming machines, not exceeding 20% of the total number of gaming machines, which may be available for use on the premises without time restrictions i.e. can be played 24 hours per day.

2.13.3 Children and young people are allowed into bingo premises; however, they are not permitted to participate in the bingo and if category B or C machines are made available for use, these must be separated from areas where children and young people are allowed. Social Responsibility (SR) code 3.2.5(3) states that 'licensees

must ensure that their policies and procedures take into account of the structure and layout of their gambling premises' in order to prevent underage gambling.

2.13.4 The Council will specifically have regard to the need to protect children and vulnerable persons from harm or being exploited by gambling and will expect the applicant to satisfy the authority, for example, that there will be sufficient measures to ensure that under 18-year olds do not have access to the adult only gaming machine areas.

2.13.5 Other appropriate measures may cover (but are not limited to) issues such as:

- CCTV
- Supervision of entrances/machine areas
- Physical separation of areas
- Location of entry
- Notices/signage
- Specific opening hours
- Self-barring schemes
- Provision of information leaflets/helpline numbers for organisations such as GamCare and self-exclusion forms in both prominent and discreet areas of the premises
- ATMs and cash terminals located separately from gaming machines and displaying GamCare Helpline information
- Measures / training for staff on how to deal with suspected truant school children on the premises

2.14 Betting Premises

Betting machines:

2.14.1 The Act provides that a machine is not a gaming machine if it is designed or adapted for use to bet on future real events. Some betting premises may make available machines that accept bets on live events, such as horseracing, as a substitute for placing a bet over the counter. These betting machines, also known as self-serve betting terminals (SSBTs), are not gaming machines: they merely automate the process that can be conducted in person and, and the Act exempts them from regulation as a gaming machine.

2.14.2 The Council will, as per the Gambling Commission's Guidance, specifically have regard to the need to protect children and vulnerable persons from harm or being exploited by gambling and will expect the applicant to satisfy the authority that there will be sufficient measures to, for example, ensure that under 18 year olds do not have access to the premises (it is an offence for those under 18 to bet), also referred to by the Social Responsibility (SR) code 3.2.7(3) in the LCCP.

2.14.3 Other appropriate measures to meet the licensing objectives may cover (but are not limited to) issues such as:

- The size of the premises
- The number of counter positions available for person-to-person transactions
- Proof of age schemes
- CCTV
- Supervision of entrances and machine areas
- Physical separation of areas
- Location of entry
- Notices/signage
- Specific opening hours
- Self-barring schemes
- Provision of information leaflets/helpline numbers for organisations such as GamCare and self-exclusion forms in both prominent and discreet areas of the premises
- ATMs and cash terminals located separately from gaming machines and displaying GamCare Helpline information

2.14.4 Appendix C provides a Summary of Machine Provisions by Premises.

2.14.5 The council will be kept up to date on the outcome of the DCMS proposed changes to gaming machine stakes and prizes, which will be available on the Gambling Commission's website.⁴

2.15 Tracks

2.15.1 The Council is aware that tracks may be subject to one or more than one premises licence, provided each licence relates to a specified area of the track. As per the Gambling Commission's Guidance, the Council will especially consider the impact upon two of the licensing objectives (i.e. gambling is open and fair, and protection of children and vulnerable persons from being harmed or exploited by gambling) and that children are excluded from gambling areas where they are not permitted to enter.

2.15.2 The Council will therefore expect the premises licence applicant to demonstrate suitable measures to ensure that children do not have access to adult only gaming facilities. It is noted that children and young persons will be permitted to enter track areas where facilities for betting are provided on days when dog racing and/or horse racing takes place, but that they are still prevented from entering areas where gaming machines (other than category D machines) are provided.

2.15.3 The Council may consider measures to meet the licensing objectives, such as: -

- Proof of age schemes

⁴ <http://www.gamblingcommission.gov.uk/for-gambling-businesses/Compliance/Sector-specific-compliance/Arcades-and-machines/Gaming-machine-categories/Gaming-machine-categories.aspx>

- CCTV
- Supervision of entrances/machine areas
- Physical separation of areas
- Location of entry
- Notices/signage
- Specific opening hours
- Self-exclusion schemes
- Provision of information leaflets/helpline numbers for organisations such as GamCare

2.15.4 The list is not mandatory, nor exhaustive, and is merely indicative of example measures.

2.16 Gaming Machines

2.16.1 Where the applicant holds a pool betting operating licence and is going to use the entitlement to four gaming machines, machines (other than Category D machines) should be located in areas from which children are excluded.

2.17 Betting Machines:

2.17.1 The Council will take into account the size of the premises and the ability of staff to monitor the use of machines by children and young persons (it is an offence for those under 18 to bet) or by vulnerable people, when considering the number/nature/circumstances of betting machines an operator wants to offer.

2.18 Travelling Fairs

2.18.1 This Council is responsible for deciding whether, where category D machines and/or equal chance prize gaming without a permit is to be made available for use at travelling fairs, the statutory requirement that the facilities for gambling amount to no more than an ancillary amusement at the fair is met.

2.18.2 The Council will also consider whether the applicant falls within the statutory definition of a travelling fair contained in Section 286 of the Gambling Act 2005.

2.18.3 The Council notes that the 27-day statutory maximum for the land being used as a fair, is per calendar year, and that it applies to the piece of land on which the fairs are held, regardless of whether it is the same or different travelling fairs occupying the land. The Council will work with its neighbouring authorities to ensure that land, which crosses our boundaries, is monitored so that the statutory limits are not exceeded.

2.19 Applications and Plans

2.19.1 The Gambling Act requires applicants to submit plans of the premises with their application, in order to ensure that the Council has the necessary information to make an informed judgement about whether the premises are fit for gambling. They will also be used for the Council to plan future premises inspection activity.

2.19.2 Specifically, the Council endorses the requirements of the Gambling Act 2005 (Premises Licences and Provisional Statements) Regulation 2007 (as amended) which states that a plan must show:

- the extent of the boundary or perimeter of the premises
- where the premises include, or consist of, one or more buildings, the location of any external or internal walls of each such building
- where the premises form part of a building, the location of any external or internal walls of the building which are included in the premises
- where the premises are a vessel or a part of a vessel, the location of any part of the sides of the vessel, and of any internal walls of the vessel, which are included in the premises
- the location of each point of entry to and exit from the premises, including in each case a description of the place from which entry is made or to which the exit leads.

2.19.3 Plans for tracks should be drawn to scale sufficiently detailed to include the information required by regulations.

2.19.4 The Council appreciates that it is sometimes difficult to define the precise location of betting areas on tracks. The precise location of where betting facilities are provided is not required to be shown on track plans, both by virtue of the fact that betting is permitted anywhere on the premises and because of the difficulties associated with pinpointing exact locations for some types of track. Applicants should provide sufficient information that this Council can satisfy itself that the plan indicates the main areas where betting might take place.

2.20 Provisional Statements

2.20.1 Developers may wish to apply to this Council for provisional statements before entering into a contract to buy or lease property or land to judge whether a development is worth taking forward in light of the need to obtain a premises licence. There is no need for the applicant to hold an operating licence in order to apply for a provisional statement.

2.20.2 Section 204 of the Gambling Act provides for a person to make an application to the Council for a provisional statement in respect of premises that he or she:

- expects to be constructed;
- expects to be altered; or
- expects to acquire a right to occupy.

2.20.3 The process for considering an application for a provisional statement is the same as that for a premises licence application. The applicant is obliged to give notice of the application in the same way as applying for a premises licence. Responsible authorities and interested parties may make representations and there are rights of appeal.

2.20.4 In contrast to the premises licence application, the applicant does not have to hold or have applied for an operating licence from the Gambling Commission (except in the case of a track) and they do not have to have a right to occupy the premises in respect of which their provisional application is made.

2.20.5 The holder of a provisional statement may then apply for a premises licence once the premises are constructed, altered or acquired. The Council will be constrained in the matters it can consider when determining the premises licence application, and in terms of representations about premises licence applications that follow the grant of a provisional statement, no further representations from relevant authorities or interested parties can be taken into account unless:

- they concern matters which could not have been addressed at the provisional statement stage; or
- they reflect a change in the applicant's circumstances.

2.20.6 In addition, the Council may refuse the premises licence (or grant it on terms different to those attached to the provisional statement) only by reference to matters:

- which could not have been raised by objectors at the provisional statement stage;
- which in the Council's opinion reflect a change in the operator's circumstances; or
- where the premises has not been constructed in accordance with the plan submitted with the application. This must be a substantial change to the plan and this Council notes that it can discuss any concerns it has with the applicant before making a decision.

3. Permits/Temporary and Occasional Use Notices

A table setting out gaming machine entitlement is attached at Appendix C.

3.1 Unlicensed Family Entertainment Centre Gaming Machine Permits

3.1.1 Where a premises does not hold a Premises Licence but wishes to provide category D gaming machines, it may apply to the Council for this permit.

3.1.2 It should be noted that the applicant must show that the premises will be wholly or mainly used for making gaming machines available for use and would, therefore, exclude any premises primarily used for any other purposes, e.g.

canteens, fast food takeaways, leisure centres, garages and petrol filling stations, taxi offices.

3.1.3 An application for a permit may be granted only if the Council is satisfied that the premises will be used as an unlicensed Family Entertainment Centre and the Chief Officer of Police has been consulted on the application.

3.1.4 The Council will expect the applicant to show that there are policies and procedures in place to protect children from harm. Harm in this context is not limited to harm from gambling but includes wider child protection considerations. The efficiency of such policies and procedures will each be considered on their merits. However, they may include appropriate measures/training for staff as regards suspected truant school children on the premises, measures/training covering how staff would deal with unsupervised very young children being on the premises, or children causing perceived problems on/around the premises. The applicant for a Family Entertainment Centre should provide evidence that a suitable criminal record check has been conducted on all staff in his/her employment.

3.1.5 This Council will also expect, as per Gambling Commission Guidance, that applicants demonstrate: -

- A full understanding of the maximum stakes and prizes of the gambling that is permissible in unlicensed Family Entertainment Centres;
- That the applicant has no relevant convictions (those that are set out in Schedule 7 of the Act);
- That staff are trained to have a full understanding of the maximum stakes and prizes.

3.1.6 It should be noted that the Council cannot attach conditions to this type of permit.

3.2 (Alcohol) Licensed Premises Gaming Machine Permits

3.2.1 There is provision in the Act for premises licensed to sell alcohol for consumption on the premises, to automatically have 2 gaming machines, of categories C and/or D. The premises merely need to notify the licensing authority.

3.2.2 The Council may remove the automatic authorisation in respect of any particular premises if:

- Provision of the machines is not reasonably consistent with the pursuit of the Licensing Objectives
- Gaming has taken place on the premises that breaches a condition of section 282 of the Gambling Act
- The premises are mainly used for gaming
- An offence under the Gambling Act has been committed on the premises

3.2.3 If a premises wishes to have more than 2 machines, then it needs to apply for a permit and the Council must consider that application based upon:

- The Licensing Objectives
- Guidance issued by the Commission
- Such matters as they think relevant

3.2.4 The Council considers that 'such matters' will be decided on a case by case basis but generally the Council will expect the applicant to ensure that there are sufficient measures to protect children and vulnerable persons from being harmed or exploited by gambling, including:

- That under 18-year olds do not have access to the adult-only gaming machines
- That adult machines are in sight of the bar, or in the sight of staff
- The provision of information leaflets/helpline numbers for organisations such as GamCare and self-exclusion forms in both prominent and discreet areas of the premises
- ATMs and cash terminals located separately from gaming machines and displaying GamCare Helpline information

3.2.5 The Council may decide to grant the application with a smaller number of machines and/or a different category of machines than that applied for. Conditions (other than these) cannot be attached.

3.2.6 The holder of a permit must comply with any Code of Practice issued by the Gambling Commission, under Section 24 to the Gambling Act 2005, about the location and operation of the machine.

3.3 Prize Gaming Permits

3.3.1 The Council has the right to prepare a 'Statement of Principles' that it proposes to apply in exercising its functions under Schedule 14 of the Act which may, in particular, specify matters that this authority propose to consider in determining the suitability of the applicant for a permit.

3.3.2 The Council has prepared a 'Statement of Principles', which is that the applicant should set out the types of gaming that he or she is intending to offer and that the applicant should be able to demonstrate:

- That they understand the limits to stakes and prizes that are set out in Regulations;
- And that the gaming offered is within the law;
- Clear policies that outline the steps to be taken to protect children from harm.

3.3.3 In making its decision on an application for this permit the licensing authority does not need to have regard to the licensing objectives but must have regard to any Gambling Commission guidance.

3.3.4 It should be noted that there are conditions in the Gambling Act 2005 by which the permit holder must comply, but that the licensing authority cannot attach conditions. The conditions in the Act are:

- The limits on participation fees, as set out in regulations, must be complied with;
- All chances to participate in the gaming must be allocated on the premises on which the gaming is taking place and on one day; the game must be played and completed on the day the chances are allocated; and the result of the game must be made public in the premises on the day that it is played;
- The prize for which the game is played must not exceed the amount set out in regulations (if a money prize), or the prescribed value (if non-monetary prize); and
- Participation in the gaming must not entitle the player to take part in any other gambling.

3.4 Club Gaming and Club Machines Permits

3.4.1 Members Clubs and Miners' Welfare Institutes (but not Commercial Clubs) may apply for a Club Gaming Permit or a Club Gaming Machines Permit. The Club Gaming Permit will enable the premises to provide gaming machines (3 machines of categories B, C or D), equal chance gaming and games of chance. Members Clubs and Miners' Institutes and also Commercial Clubs may apply for a Club Machine Permit. A Club Gaming Machine Permit will enable the premises to provide gaming machines (3 machines of categories B, C or D). Commercial Clubs may not site category B3A gaming machines offering lottery games in their club.

3.4.2 The Council has to satisfy itself that the club meets the requirements of the Act to obtain a club gaming permit. In doing so it will take into account a number of matters as outlined in the Gambling Commission's Guidance. These include the constitution of the club, the frequency of gaming, and ensuring that there are at least 25 members.

3.4.3 The club must be conducted "wholly or mainly" for purposes other than gaming, unless the gaming is permitted by separate regulations. The Secretary of State has made regulations and these cover bridge and whist clubs.

3.4.4 The Council may only refuse an application on the grounds that:

- a) The applicant does not fulfil the requirements for a members' or commercial club or miners' welfare institute and therefore is not entitled to receive the type of permit for which it has applied;
- b) The applicant's premises are used wholly or mainly by children and/or young persons;
- c) An offence under the Act or a breach of a permit has been committed by the applicant while providing gaming facilities;

- d) A permit held by the applicant has been cancelled in the previous ten years; or
- e) An objection has been lodged by the Commission or the police.

3.4.5 There is also a 'fast-track' procedure available under the Act for premises which hold a Club Premises Certificate under the Licensing Act 2003 (Schedule 12 paragraph 10). Commercial clubs cannot hold Club Premises Certificates under the Licensing Act 2003 and so cannot use the fast track procedure. As the Gambling Commission's Guidance for local authorities states: "Under the fast-track procedure there is no opportunity for objections to be made by the Commission or the police, and the grounds upon which an authority can refuse a permit are reduced." and "The grounds on which an application under the process may be refused are:

- a) That the club is established primarily for gaming, other than gaming prescribed under schedule 12;
- b) That in addition to the prescribed gaming, the applicant provides facilities for other gaming; or
- c) That a club gaming permit or club machine permit issued to the applicant in the last ten years has been cancelled."

3.4.6 There are statutory conditions on club gaming permits that no child uses a category B or C machine on the premises and that the holder complies with any relevant provision of a code of practice about the location and operation of gaming machines.

3.5 Temporary Use Notices

3.5.1 Temporary Use Notices allow the use of premises for gambling where there is no premises licence but where a gambling operator wishes to use the premises temporarily for providing facilities for gambling. Premises that might be suitable for a Temporary Use Notice, according to the Gambling Commission, would include hotels, conference centres and sporting venues.

3.5.2 The Council can only grant a Temporary Use Notice to a person or company holding a relevant operating licence, i.e. a non-remote casino operating licence.

3.5.3 The Secretary of State has the power to determine what form of gambling can be authorised by Temporary Use Notices, and at the time of writing this Statement, the relevant regulations (S1 no. 3157: The Gambling Act 2005 (Temporary Use Notices) Regulations 2007) state that Temporary Use Notices can only be used to permit the provision of facilities or equal chance gaming, where the gaming is intended to produce a single winner, which in practice means poker tournaments.

3.5.4 There are a number of statutory limits as regards temporary use notices. The meaning of "premises" in part 8 of the Act is discussed in Part 7 of the Gambling Commission Guidance. As with "premises", the definition of "a set of premises" will be a question of fact in the particular circumstances of each notice that is given. In the Act "premises" is defined as including "any place". In considering whether a place falls within the definition of "a set of premises", the Council needs to look at, amongst other things, the ownership/occupation and control of the premises.

3.5.5 This Council expects to object to notices where it appears that their effect would be to permit regular gambling in a place that could be described as one set of premises; as recommended by the Gambling Commission's Guidance to licensing authorities.

3.6 Occasional Use Notices

3.6.1 The Council has very little discretion as regards these notices aside from ensuring that the statutory limit of 8 days in a calendar year is not exceeded. The Council will though consider the definition of a 'track' and whether the applicant is permitted to avail him/herself of the notice.

4. Small Society Lotteries

4.1 The Council will adopt a risk-based approach towards its enforcement responsibilities for small society lotteries. The Council considers that the following list, although not exclusive, could affect the risk status of the operator:

- submission of late returns (returns must be submitted no later than three months after the date on which the lottery draw was held)
- submission of incomplete or incorrect returns
- breaches of the limits for small society lotteries

4.2 Non-commercial gaming is permitted if it takes place at a non-commercial event, either as an incidental or principal activity at the event. Events are non-commercial if no part of the proceeds is for private profit or gain. The proceeds of such events may benefit one or more individuals if the activity is organised:

- by, or on behalf of, a charity or for charitable purposes
- to enable participation in, or support of, sporting, athletic or cultural activities.

4.3 Charities and community groups should contact the Council via e-mail to licensing@enfield.gov.uk .

5. Decision Making

5.1 Administration, Exercise and Delegation of Functions

5.1.1 The powers and duties of the Council under the Act may be carried out by the Licensing Committee, by a Sub-Committee or by one or more officers acting under delegated authority.

5.1.2 It is considered that many of the functions will be largely administrative in nature with no perceived areas of contention. In the interests of efficiency and cost effectiveness these will, for the most part, be carried out by officers.

5.1.3 The following schedule sets out the recommended delegation of functions and decisions by guidance. The Council may, nevertheless, refer any matter to the Licensing Committee or Sub-Committee.

5.1.4 The schedule of delegation of licensing functions is attached at Appendix E.

5.2 Appeals Procedure

5.2.1 Entitlements to appeal for parties aggrieved by decisions of the Council are set out in Sections 206 to 209 of the 2005 Act. Appeals must be made to the Magistrates Court for the area in which the licensing authority, which has considered the application, is situated.

5.2.2 An appeal has to be commenced by giving notice of the appeal by the appellant to; The Clerk to the Justices, North London Magistrates Court at the following address: North London Magistrates Court, Highbury Corner, 51 Holloway Road, London, N7 8JA, within a period of 21 days, beginning with the day on which the appellant was notified by the Council of the decision to be appealed against.

5.2.3 On determining an appeal, the Court may:

- Dismiss the appeal;
- Substitute the decision appealed against with any other decision that could have been made by the licensing authority;
- Remit the case to the licensing authority to dispose of the appeal in accordance with the direction of the Court;
- Make an order about costs.

5.3 Giving Reasons for Decisions

5.3.1 In anticipation of such appeals, the Council will give full reasons for its decisions. The Council will address the extent to which decisions have been made with regard to any relevant codes of practice and guidance issued by the Gambling Commission, reasonably consistent with the licensing objectives and in accordance with this Policy Statement.

5.4 Implementing the Determination of The Magistrates' Court

5.4.1 As soon as the decision of the Magistrates' Court has been notified to all parties, the Council will not delay its implementation and necessary action will be taken forthwith unless ordered by a higher court to suspend such action (for example, as a result of an ongoing judicial review). The Act provides for no other appeal against the determination of the Magistrates' Court.

5.5 Complaints against Licensed Premises

5.5.1 The Council will investigate complaints against licensed premises in relation to matters relating to the licensing objectives for which it has responsibility. In the first instance, complainants are encouraged to raise the complaint directly with the licence holder or business concerned to seek a local resolution.

5.5.2 Where an interested party has made either a valid representation about licensed premises or a valid application for a licence to be reviewed, the Council may initially arrange a conciliation meeting to address and clarify the issues of concern.

5.5.3 This process will not override the right of any interested party to ask that the Licensing and Gambling Sub-Committee consider their valid objections or for any licence holder to decline to participate in a conciliation meeting.

5.5.4 Due consideration will be given to all relevant representations unless they fit the exceptions in 5.6 below.

5.6 Reviews

5.6.1 Requests for a review can be made by Interested Parties or Responsible Authorities. However, it is for the Council to decide whether the review is to be carried out based upon any relevant codes of practice and guidance issued by the Gambling Commission, reasonably consistent with the licensing objectives and in accordance with this Policy Statement.

5.6.2 The request for the review will also be subject to the consideration by the Council as to whether it is frivolous, vexatious, or whether it will not cause this Council to alter/revoke/suspend the licence, or whether it is substantially the same as previous representations or requests for review.

5.6.3 The Council can also initiate a review of a particular premises licence, or a particular class of premises licence on the basis of any reason, which it thinks is appropriate.

5.6.4 Once a valid application for a review has been received by the Council, representations can be made by responsible authorities and interested parties during a 28-day period. This period begins 7 days after the application was received by the Council, who will publish notice of the application within 7 days of receipt.

5.6.4 The Council must carry out the review as soon as possible after the 28-day period for making representations has passed.

5.6.5 The purpose of the review will be to determine whether the Council should take any action in relation to the licence. If action is justified, the options open to the Council are: -

- add, remove or amend a licence condition imposed by the Council;

- exclude a default condition imposed by the Secretary of State (e.g. opening hours) or remove or amend such an exclusion;
- suspend the premises licence for a period not exceeding three months; and
- revoke the premises licence.

5.6.6 In determining what action, if any, should be taken following a review, the Council must have regard to the principles set out in Section 153 of the Act, as well as any relevant representations, and what consideration was given to local area risk profile. In particular, the Council may also initiate a review of a premises licence on the grounds that a premises licence holder has not provided facilities for gambling at the premises. This is to prevent people from applying for licences in a speculative manner without intending to use them.

5.6.7 Once the review has been completed, the Council must, as soon as possible, notify its decision to:

- the licence holder;
- the applicant for review (if any);
- the Commission;
- any person who made representations;
- the chief officer of police or chief constable; and
- Her Majesty's Commissioners for Revenue and Customs.

6. The Local Risk Profile and Risk Assessments by Operators – Licensing Conditions and Codes of Practice 2018 (LCCP)

6.1 LCCP

6.1.1 The Gambling Commission updated the LCCP in January 2018 with a commencement date of April 2018. Details regarding the LCCP can be accessed via the Gambling Commission website at www.gamblingcommission.gov.uk.

6.2 Risk Assessments

6.2.1 A risk assessment is required from all operators. In accordance with SR Code Provision 10.1.1, all licensees must assess local risks to the licensing objectives posed by the provision of gambling facilities at each of their premises, have policies, procedures and control measures to mitigate those risks. This is a social responsibility code provision and compliance is mandatory. It is a condition of an operating licence that there is compliance with social responsibility code provisions.

6.2.2 Operators shall submit the risk assessment to licensing authorities upon application either for new premises licence or variation of a premises licence, or

otherwise on request, and this will form part of the council's inspection regime and shall be requested when officers are investigating complaints.

6.2.3 Any failure to provide a competent risk assessment will be taken into account by the Council in determining the application, and such inferences will be made about potential harm to the licensing objectives as appear appropriate.

6.2.4 The Council considers that these local risk assessments are a key component of the overall assessment and management of the local risks. This council expects the Borough's local area profile and matters such as the following to be considered by operators when making their risk assessment:

- Information held by the licensee regarding self-exclusions and incidences of underage gambling;
- Gaming trends that may reflect benefit payments;
- Arrangement for localised exchange of information regarding self-exclusions and gaming trends;
- Urban setting such as proximity to schools, commercial environment, factors affecting footfall;
- Range of facilities in proximity to the licensed premises such as other gambling outlets, banks, post offices, refreshment and entertainment type facilities;
- Known problems in the area such as problems arising from street drinkers, youths participating in anti-social behaviour, drug dealing activities, etc.;
- The ethnicity, age, economic makeup of the local community.

6.2.5 The risk assessment should cover the risks and character of the local area, the gambling operation and the design of the premises.

6.3 The Gambling Operation

6.3.1 In assessing the risk factors associated with a gambling operation the assessor should take into account the local area profile and how that gambling operation may affect that risk. The assessor may wish to consider:

- How the gambling operation will relate to how the operator conducts its business;
- What gambling products it provides in the premises;
- The facilities to enable gambling within the premises;
- The staffing levels within the premises;
- The level and requirement for staff training;
- Whether loyalty or account cards are used or not;
- The policies and procedures it has in place in relation to regulatory requirements of the Act or to comply with the LCCP;
- The security and crime prevention arrangements it has in place;
- How it advertises locally and on the premises;
- The marketing material within the premises;
- The display and provision of information, etc.

6.4 The Design of the Premises

6.4.1 The design and layout of the premises is a key consideration as this could have a significant impact on the risk to the licensing objectives. In assessing the risk factors associated with the premises design and layout reference is needed to the local area risks factors already identified to ensure the design doesn't add to that risk. The design, both internal and external should be considered and specific risk factors identified and noted. For example:

- The premises may have a number of support pillars which the assessor identifies as obstructing the view of the gaming machines from the cashier counter
- The assessor may identify that the design of the entrance to the casino is not sufficiently covered by CCTV to enable the identification of offenders.
- Premises which are located within an area which has a high number of children and young people present throughout the day, may identify that their standard external design means that children, young people and vulnerable people can see into the premises and see gambling taking place.
- If a premises has a large amount of glass frontage in an area prone to criminal damage, the assessor may consider the risk of damage to the standard toughened glass to be high.

6.5 Local Area Profile

6.5.1 Enfield's local area profile is our assessment of the local environment and the maps in Section 1 of the Local Area Profile document identifies the key characteristics of Enfield. It is intended that the local area profile will provide us, operators and the public with a better understanding and awareness of the gambling-related risks in the Borough. In this context, risk includes actual and potential risk and also takes into account any future or emerging risks.

6.5.2 Our local area profile takes account of a wide number and range of factors and information. It enables us better to serve our local community by providing clarity for operators as to the relevant factors we will consider in our decision making and it enables us to make evidence-based decisions from a clear and published set of factors and risks

6.5.3 We expect that the local area profile will lead to improved premises licence applications and that operators will be able to incorporate controls and measures within their applications to mitigate risk. Through this pro-active approach to risk, we expect to achieve a reduction in non-compliance and enforcement action.

6.5.4 We accept that the local environment can change, and we must therefore retain the ability to review and quickly update the local area profile so that we remain aware of the current and emerging risks. For this reason, we have not included our local area profile within the body of this Policy, and we have published it as a

separate document. This will allow us to update factual information within the local area profile and to quickly assess new or emerging risks from which to inform our decisions without the need for full consultation.

6.5.5 We expect operators to update their local risk assessments to take account of any changes in Enfield's local area profile. To assist, we will inform all operators when we make any changes to our local area profile.

7. Further Information

Further information about the Gambling Act 2005, this Statement of Principles, the application process and related matters can be obtained from licensing@enfield.gov.uk. Or www.enfield.gov.uk.

Information is also available from:

The Gambling Commission
4th Floor
Victoria Square House
Birmingham
B2 4BP
Telephone: 0121 230 6666
Website: www.gamblingcommission.gov.uk

The Department for Culture, Media and Sport
100 Parliament Street
London
SW1A 2BQ
Email: enquiries@dcms.gov.uk

Website: www.gov.uk/government/organisations/department-for-digital-culture-media-sport

Appendix A Definitions

NOTE: In this Policy, the following definitions are included to provide an explanation to certain terms included in the Act and, therefore, in the Statement of Licensing Policy. In some cases, they are an abbreviation of what is stated in the Gambling Act 2005 or an interpretation of those terms. For a full definition of the terms used, the reader must refer to the Gambling Act 2005.

'The Council' means London Borough of Enfield Council, acting as the Licensing Authority as defined by the Gambling Act 2005.

'The Act' means the Gambling Act 2005.

'The Licensing Authority' the authority in whose area the premises is wholly/partly situated. The Licensing Authority (as in the issuing authority) is also a responsible authority.

'The Gambling Commission' a body set up by the Government as the unified regulator for gambling, replacing the Gaming Board.

'Responsible Authority' means a public body that must be notified of certain applications for premises licences and permits and are entitled to make representations on any of the licensing objectives.

'Children' means individuals who are less than 16 years old.

'Young person' means individuals who are aged less than 18 years old and 16 years and over.

'Mandatory Conditions' means a specified condition provided by regulations to be attached to premises licences.

'Default Conditions' means a specified condition provided for by regulations to be attached to a licence unless excluded by the Council.

'Premises' means any place, including a vessel or moveable structure.

'Vulnerable person' means (Public Health):

- children, adolescents and young adults (including students)
- people with mental health issues, including those experiencing substance abuse issues (problem gambling is often 'co-morbid' with these substance addictions)
- individuals from certain minority ethnic groups, such as Asian/Asian British, Black/ Black British and Chinese/other ethnicity
- the unemployed
- the homeless
- those with low intellectual functioning
- problem gamblers seeking treatment
- people with financially constrained circumstances
- those living in deprived areas.

Appendix B Access to Premises

Casinos

- The principal entrance to the premises must be from a 'street';
- No entrance to a casino must be from premises that are used wholly or mainly by children and/or young persons;
- No customer must be able to enter a casino directly from any other premises which holds a gambling premises licence.

Adult Gaming Centre

- No customer must be able to access the premises directly from any other licensed gambling premises.

Betting Shops

- Access must be from a 'street' or from other premises with a betting premises licence;
- No direct access from a betting shop to another premises used for the retail sale of merchandise or services. In effect there cannot be an entrance to a betting shop from a shop of any kind unless that shop is itself a licensed betting premises (for example, you could not have a betting shop at the back of a café – the whole area would have to be licensed.)

Tracks

No customer should be able to access the premises directly from:

- a casino;
- an adult gaming centre.

Bingo Premises

No customer must be able to access the premises directly from:

- a casino;
- an adult gaming centre;
- a betting premises, other than a track.

Family Entertainment Centre

No customer must be able to access the premises directly from:

- a casino;
- an adult gaming centre;
- a betting premises, other than a track.

Section 7 of the Gambling Commission's Guidance to Licensing Authorities contains further guidance on this issue, which this authority will also take into account in its decision-making.

APPENDIX C: Summary of Machine Provisions by Premises

Premises type	Machine category						
	A	B1	B2	B3	B4	C	D
Large casino (machine/table ratio of 5-1 up to maximum)		Maximum of 150 machines Any combination of machines in categories B to D (except B3A machines), within the total limit of 150 (subject to machine/table ratio)					
Small casino (machine/table ratio of 2-1 up to maximum)		Maximum of 80 machines Any combination of machines in categories B to D (except B3A machines), within the total limit of 80 (subject to machine/table ratio)					
Pre-2005 Act casino (no machine/table ratio)		Maximum of 20 machines categories B to D (except B3A machines), or any number of C or D machines instead					
Betting premises and tracks occupied by pool betting		Maximum of 4 machines categories B2 to D (except B3A machines)					
Bingo premises ¹					Maximum of 20% of the total number of gaming machines which are available for use on the premises categories B3 or B4	No limit on category C or D machines	
Adult gaming centre ²					Maximum of 20% of the total number of gaming machines which are available for use on the premises categories B3 or B4	No limit on category C or D machines	
Licensed family entertainment centre ³							No limit on category C or D machines
Family entertainment centre (with permit) ³							No limit on category D machines
Clubs or miners' welfare institute (with permits) ⁴					Maximum of 3 machines in categories B3A or B4 to D		
Qualifying alcohol-licensed premises					1 or 2 machines of category C or D automatic upon notification		
Qualifying alcohol-licensed premises (with licensed premises gaming machine permit)				Number of category C-D machines as specified on permit			
Travelling fair				No limit on category D machines			

¹Bingo premises licence are entitled to make available for use a number of category B gaming machines not exceeding 20% of the total number of gaming machines on the premises. Where a premises licence was granted before 13 July 2011, they are entitled to make available eight¹⁰⁴ category B gaming machines, or 20% of the total number of gaming machines, whichever is the greater. Category B machines at bingo premises are restricted to sub-category B3 and B4 machines, but not B3A machines.

² Adult gaming centres are entitled to make available for use a number of category B gaming machines not exceeding 20% of the total number of gaming machines which are available for use on the premises and any number of category C or D machines. Where a premises licence was granted before 13 July 2011, they are entitled to make available four category B gaming machines, or 20% of the total number of gaming machines, whichever is the greater. Category B machines at adult gaming centres are restricted to sub-category B3 and B4 machines, but not B3A machines.

¹⁰⁴ The Gambling Act 2005 (Gaming Machines in Bingo Premises) Order 2009

Appendix D Schedule of Delegation of Licensing Functions and Decisions

Summary of licensing authority delegations permitted under the Gambling Act, applicable to England and Wales only

Matter to be dealt with	Full Council	Sub-committee of licensing committee	Officers
Final approval of the Licensing Authority Policy statement	X		
Changes to the Local Area Profile attached to this Policy		Full Licensing Committee	
Policy not to permit casinos	X		
Fee setting (when appropriate)		X (if delegated by full council)	
Application for premises licences		X Where representations have been received and not withdrawn	X Where no representations received/representations have been withdrawn
Application for a variation to a licence		X Where representations have been received and not withdrawn	X Where no representations received/representations have been withdrawn
Application for a transfer of a licence		X Where representations have been received from the Commission or responsible authority	X Where no representations received from the Commission or responsible authority
Application for a provisional statement		X Where representations have been received and not withdrawn	X Where no representations received/representations have been withdrawn
Review of a premises licence		X	
Application for club gaming/club machine permits		X Where objections have been made and not withdrawn	X Where no objections made/objections have been withdrawn
Cancellation of club gaming/club machine permits		X	
Applications for other permits			X
Cancellation of licensed premises gaming machine permits			X
Consideration of temporary use notice			X
Decision to give a counter notice to a temporary use notice		X	

X indicates the lowest level to which decisions can be delegated

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Annex 2

LONDON BOROUGH OF ENFIELD

GAMBLING ACT 2005

**GAMBLING LOCAL AREA
PROFILE**

January 2022



1.1 Introduction and Background

1.1.1 The Council is the licensing authority under the Gambling Act 2005 (the Act) and is responsible for issuing premises licences and permits for gambling venues. When the Council exercises its functions in respect of gambling, it must have regard to the Act and its regulations, gambling codes of practice, the Council's Statement of Licensing Policy and the Gambling Commission's Guidance to Local Authorities (GLA).

1.1.2 The Act also requires the Council to 'aim to permit' gambling and therefore aim to issue premises licences if applications are reasonably consistent with the following licensing objectives:

- a) preventing gambling from being a source of crime and disorder, being associated with crime or disorder or being used to support crime
- b) ensuring that gambling is conducted in a fair and open way, and
- c) protecting children and other vulnerable persons from being harmed or exploited by gambling

1.1.3 In its GLA, the Gambling Commission recommends the approach the Council should take to gambling licensing and regulation. In September 2015, the Gambling Commission issued a revised GLA (5th edition) with many changes for licensing authorities that fall under three broad themes:

- increased focus on risk and regulation
- greater attention to local area risk, and
- encouraging partnership and collaboration between stakeholders to mitigate risk

1.1.4 In addition, changes to the Gambling Licence Conditions and Codes of Practice (LCCP) that took effect in April 2018, require all industry operators to undertake local area risk assessments to identify the risks their gambling venues pose to the licensing objectives.

1.2 What is a gambling local area profile?

1.2.1 A local area profile is an assessment of the key characteristics of Enfield in the context of gambling-related harm. The information obtained for the assessment helps to provide a better understanding of the types of people that are at risk of being vulnerable to gambling-related harm; where they are located and any current or emerging problems that may increase that risk. Our local area profile will help us to develop our Statement of Licensing Policy and set out our expectations of operators of gambling premises.

1.3 Creating Enfield's local area profile

1.3.1 Although there is no legal requirement on the Council to complete a local area profile, we feel there is significant benefit for operators, our residents, business, visitors to Enfield and the Council to have an evidence-based awareness of the potential and actual risks of vulnerability to gambling-related harm.

1.3.2 In this context and in response to the changes in the GLA, we have completed an assessment of the key characteristics of the Borough to identify areas of higher risk of vulnerability to gambling-related harm. This assessment is Enfield's local area profile. In developing our local area profile, we have had regard to the study 'Exploring area-based vulnerability to gambling-related harm: Developing the gambling-related harm risk index' and 'Exploring area based vulnerability to harm: who is vulnerable?', Heather Wardle, Gambling and Place Research Hub, Geofutures, 9th February 2016', which was commissioned by Manchester City Council and the City of Westminster.

1.4 Our approach

1.4.1 The data which identify potential vulnerability to gambling-related harm in Enfield is visualised on maps in Section 3 below.

1.4.2 Our approach is based on the possible risk to gambling-related harm and does not mean that just because an area is seen as being at higher risk that all people in that area will suffer harm or be at risk of suffering harm.

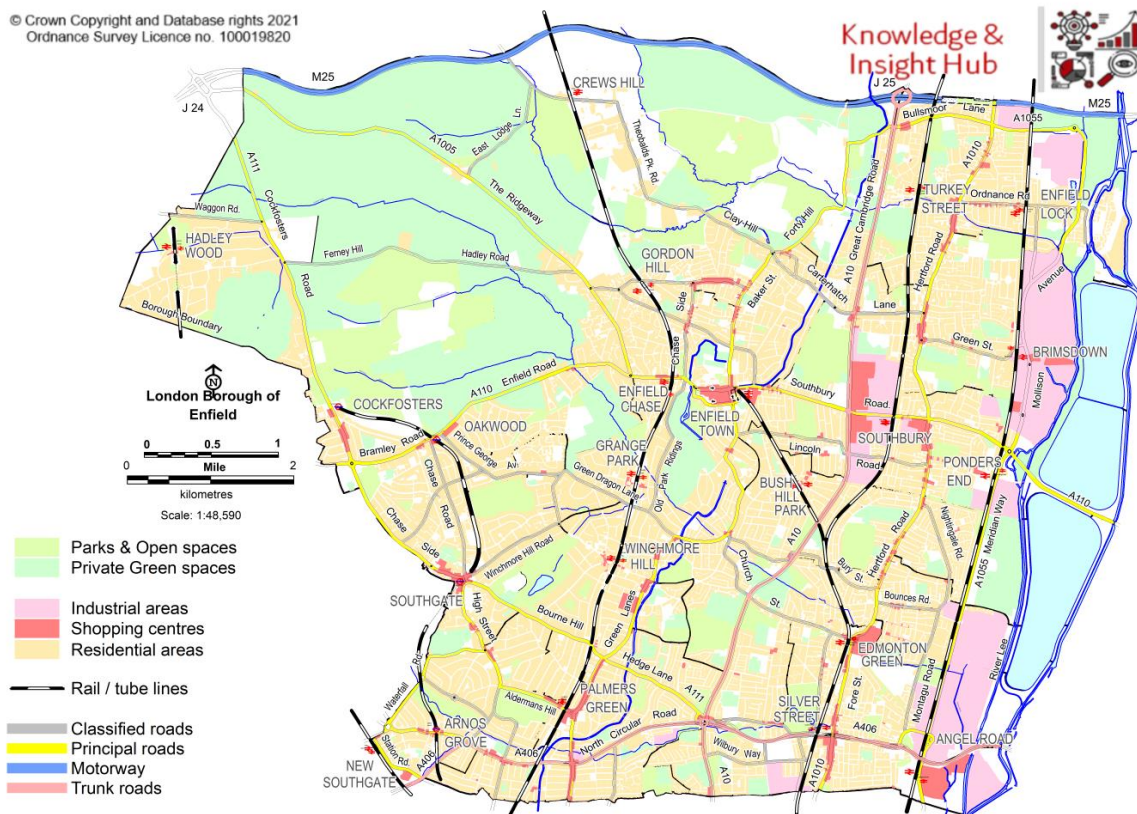
2.1 Profile of London Borough of Enfield

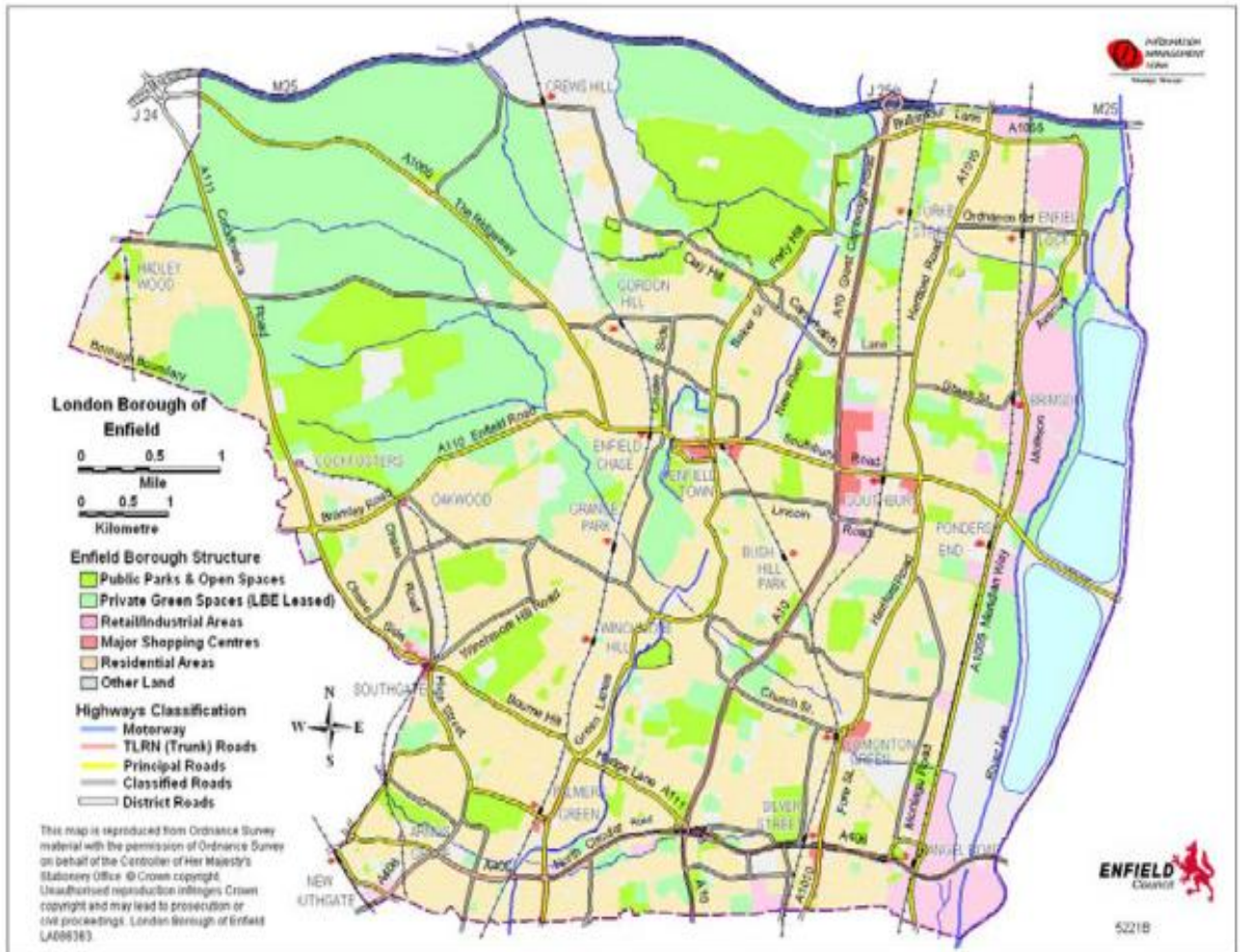
2.1.1 Enfield is London’s northernmost Borough and covers an area of 8219 hectares (82.2 square kilometres, or 31.7 square miles). Enfield has good links to the national motorway system, the north of the borough being bounded by the M25, accessed at junctions 24 and 25. It also has two trunk roads – the A10 (London to Cambridge) and A406 (London’s North Circular Road).

2.1.2 In 20196, the total dwelling stock in Enfield was estimated by the Office for National Statistics at 126,255.

2.1.3 40% of the Borough’s area is designated Green Belt Land (predominantly in the north and west) comprising country parks, farmland and open land (including urban parks, sports fields, golf courses, allotments and school playing fields). Figure 1.1 below shows a map of the borough.

Figure 1.1:

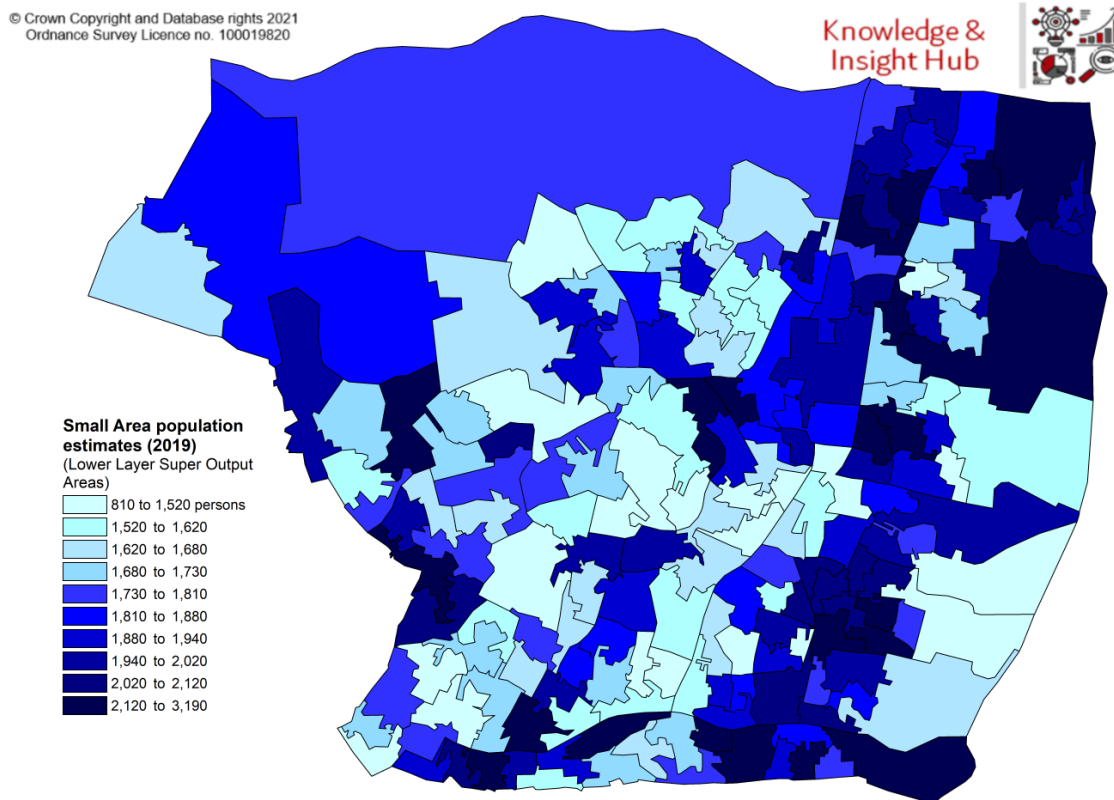




2.1.4 At Mid-2020 the population was estimated to be 333,587 (according to the [Office for National Statistics](#)) an increase of 6.8% since 2011, making Enfield the 5th largest amongst the 33 London boroughs. 2.1.5 Females and Males made up 50.9% and 49.1% respectively of the total population. The breakdown across the borough is seen in the map, Figure 1.2 below:

Figure 1.2:

Source: ONS mid-year small area population estimates 2019



2.1.6 The latest projections to use are the ONS 2020 Mid-Year Estimates. The five-year age band results for persons for Mid-2020 are in Fig 2.1:

Figure 2.1 Source: ONS mid-year estimates 2020

Age band	Males	Females	Persons
0-4 years	11,949	11,351	23,300
5-10 years	12,599	11,920	24,519
10-14 years	12,197	11,494	23,691
15-19 years	10,418	9,474	19,892
20-24 years	9,640	8,527	18,167
25-29 years	12,045	11,397	23,442
30-34 years	12,206	12,805	25,011
35-39 years	12,017	13,464	25,481
40-44 years	11,131	12,168	23,299
45-49 years	10,645	11,385	22,030
50-54 years	11,072	11,755	22,827
55-59 years	9,968	10,922	20,890
60-64 years	8,047	8,154	16,201
65-69 years	5,828	6,645	12,473
70-74 years	5,152	5,845	10,997
75-79 years	3,784	4,734	8,518
80-84 years	2,761	3,759	6,520
85-89 years	1,603	2,451	4,054
90+ years	757	1,518	2,275
All Ages	163,819	169,768	333,587

2.1.7 The child, working age and older population results by gender are shown in Figure 2.2:

Figure 2.2:

Age band	Males	Females	Persons
0 to 15	39,073	36,847	75,920
16 to 64	104,861	107,969	212,830
65+	19,885	24,952	44,837
Total	163,819	169,768	333,587

Source: ONS mid-year estimates 2020

2.1.8 The breakdown of the 22 different ethnic groups in Enfield is shown in Figure 3:

Figure 3:

Ethnicity	Estimated population size	% of total population
White British	118,466	35.3%
White Irish	7,309	2.2%
Greek	4,549	1.4%
Greek Cypriot	16,302	4.9%
Turkish	24,209	7.2%
Turkish Cypriot	6,432	1.9%
Kurdish	4,264	1.3%
White Other	25,381	7.6%
White & Black Caribbean	4,664	1.4%
White and Asian	4,348	1.3%
White and Black African	2,471	0.7%
Other mixed	6,890	2.1%
Indian	11,937	3.6%
Pakistani	2,829	0.8%
Bangladeshi	6,432	1.9%
Chinese	2,732	0.8%
Other Asian	12,852	3.8%
Somali	9,157	2.7%
Other Black African	24,763	7.4%
Black Caribbean	17,725	5.3%
Other Black	8,357	2.5%
Other Ethnic Group	13,354	4.0%

Source: 2019-based in-house ethnicity estimates. NB totals do not sum to ONS totals owing to differences in data sources .

3.1 The Local Area

3.1.1 The council expects matters such as the following to be considered by operators when making their risk assessment in order to demonstrate they have considered the local area. Some or many of these matters will have been considered and addressed by existing premises.

3.1.2 Matters relating to children and young persons, such as:

- The footfall in the local area, for example, does it predominately comprise residents, workers or visitors, is it a family orientated area, popular with children and young people;
- Significant presence of young children;
- Institutions, places or areas where presence of children and young persons should be expected such as schools, youth clubs, parks, playgrounds and entertainment venues such as bowling allies, cinemas etc.;
- Any premises where children congregate including bus stops, cafés, shops, and any other place where children are attracted;
- Areas that are prone to issues of youths participating in anti-social behaviour, including such activities as graffiti/tagging, underage drinking, etc.;
- Recorded incidents of attempted underage gambling;
- Transport links and parking facilities;
- Community centres;
- High crime area;
- Other gambling premises in the vicinity.

3.1.3 Matters relating to vulnerable adults, such as:

- Information held by the licensee regarding self-exclusions and incidences of underage gambling;
- Gaming trends that may mirror days for financial payments such as pay days or benefit payments;
- Arrangement for localised exchange of information regarding self-exclusions and gaming trends;
- Proximity of premises which may be frequented by vulnerable people such as hospitals, mental health providers, residential care homes, medical facilities, doctor's surgeries, council housing offices, addiction clinics or help centres, places where alcohol or drug dependant people may congregate, etc.;
- Homeless or rough sleeper shelters, hostels and support services;
- Transport links and parking facilities;
- Community centres;
- High crime area;
- High unemployment area;
- Pawn broker/pay day loan businesses in the vicinity;
- Other gambling premises in the vicinity.

3.1.4 The Gambling Commission guidance advises that Licensing Authorities can provide a local area profile of their borough in their Gambling Act policy. This has many benefits but should also assist operators undertaking the risk assessments of their premises and will also be taken into account when considering applications for new and variations to licences and reviews of licences. The Local Area Profile for the London Borough of Enfield is mapped in Appendix C.

3.1.5 The maps in Section 4 includes data and an overview of characteristics of the borough:

- Figure 4: Map showing distribution of gambling premises and educational establishments;
- Figure 5: Map showing distribution of gambling premises and relevant leisure facilities;
- Figure 6: Map showing distribution of gambling premises and medical facilities, care homes, and temporary accommodation etc.;
- Figure 7: Map showing distribution of gambling premises and areas of deprivation;
- Figure 8: Map showing distribution of gambling premises and areas of unemployment;
- Figure 9: Map showing distribution of gambling premises and areas where residents claim Universal Credit;
- Figure 10: Map showing distribution of gambling premises and areas of poor mental health;
- Figure 11: Map showing distribution of gambling premises and all ASB Call hotspots in Enfield between April 2018 and March 2019;
- Figure 12: Map showing distribution of gambling premises and all ASB Call hotspots in Enfield between April 2019 and March 2020;
- Figure 13: Map showing distribution of gambling premises and all ASB Call hotspots in Enfield between April 2020 and March 2021;
- Figure 14: table showing ASB call types recorded by Police within 20 metres of a gambling premises between March 2018 and March 2019;
- Figure 15: table showing ASB call types recorded by Police within 20 metres of a gambling premises between March 2019 and March 2020;
- Figure 16: table showing ASB call types recorded by Police within 20 metres of a gambling premises between March 2020 and March 2021.

3.1.6 If an application for a new licence or variation is submitted that is within 400 metres of a premises/location where children, young persons and vulnerable persons are likely to be present, then operators are encouraged to provide details of the measures to be implemented that would overcome the risks of:

- Protecting children and other vulnerable persons from being harmed or exploited by gambling.
- Being a source of crime or disorder, being associated with crime or disorder or being used to support crime;
- Ensuring that gambling is conducted in a fair and open way.

3.1.7 If the operator does not put forward measures to overcome the risks, or the Council considers that the operator's proposed measures do not adequately mitigate the risk, the council will consider what measures are needed which can include additional conditions or even refusal of the application if appropriate.

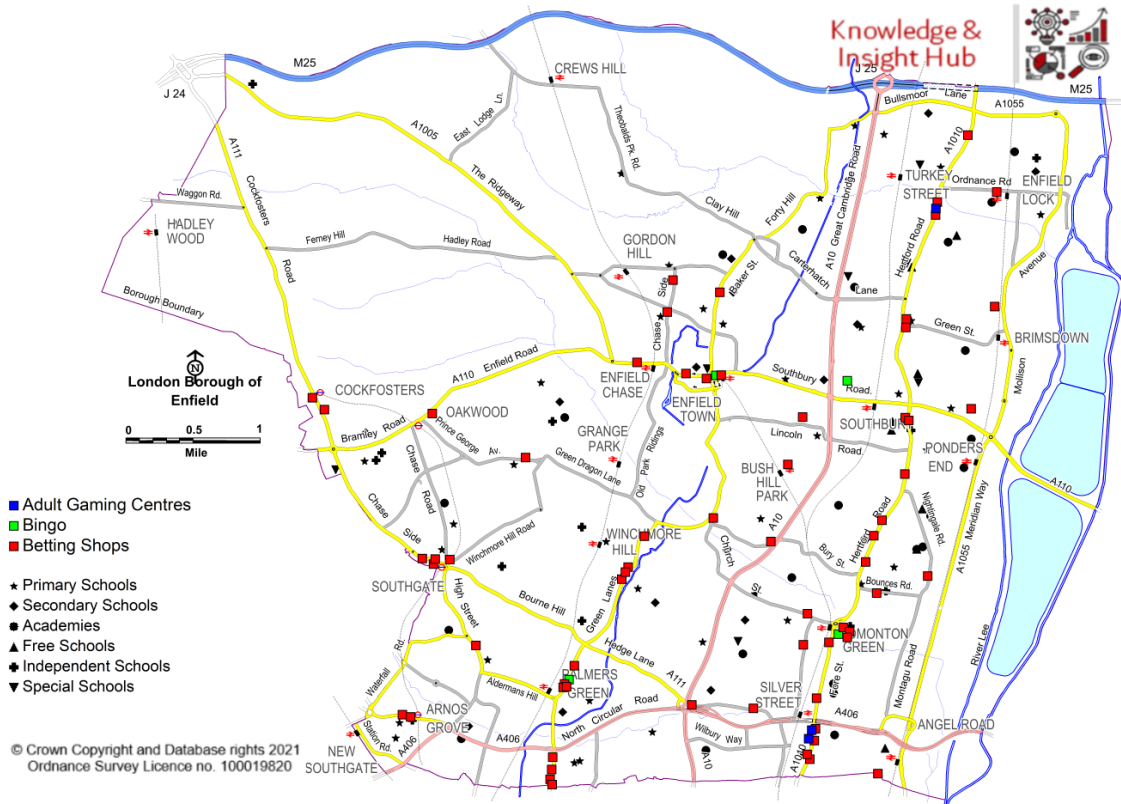
3.1.8 For gathering local information, a report was produced on the number of underage gambling complaints and failed test purchases at betting shops. Since 1st April 2018, no complaints and no sales have been recorded, compared to two complaints and nil sales between 1st April 2015 and 31st March 2018.

3.1.9 Council enforcement officers carried out inspections at all betting shops between 2019-2020, and were deemed to be compliant.

4.1 Local Area Profile

Figure 4: Map showing distribution of gambling premises and educational establishments

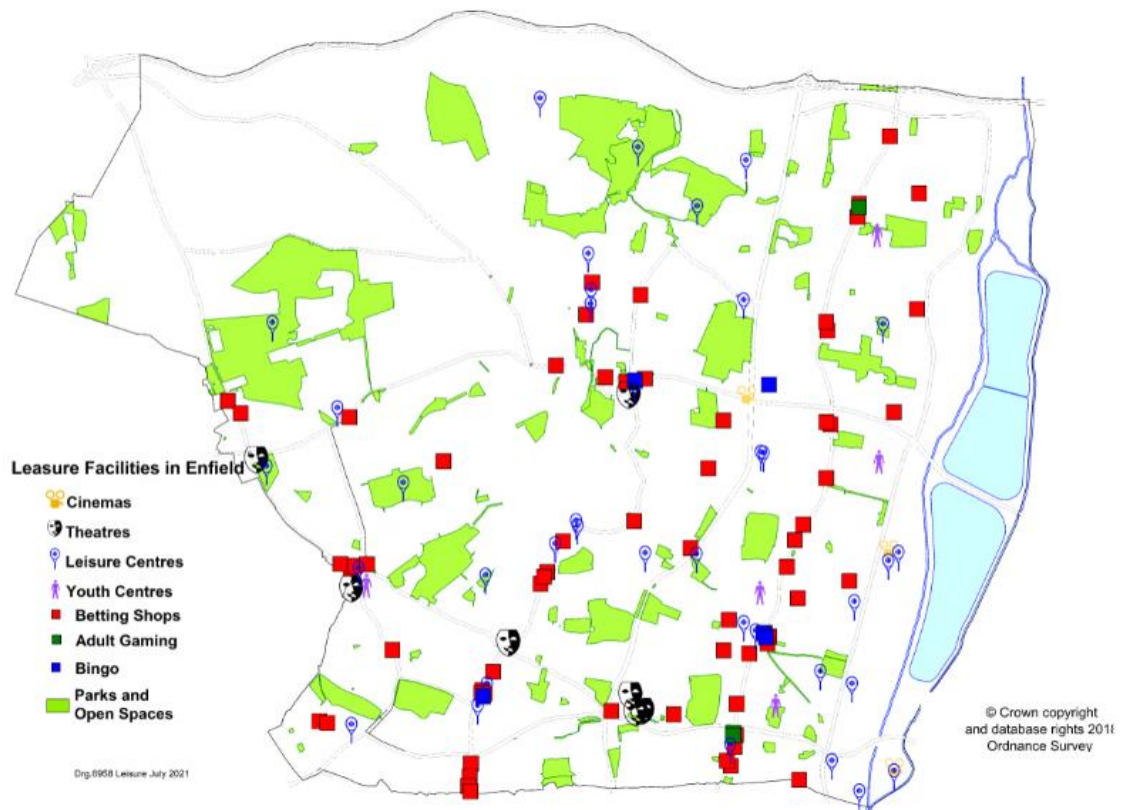
Source: Enfield Council GIS server February 2021



4.1.1 First of all, the actual distribution of existing gambling premises shops predictably shows them to be predominantly located on the main thoroughfares. Greater concentrations of betting shops are located along the Hertford Road corridor, with particular clusters around Edmonton Green shopping centre, Enfield Town and Southgate. Further away, significant clusters of betting shops are noted along Green Lanes, in the Bowes and Palmers Green centres.

4.1.2 Figure 4 identifies the educational establishments, and the map highlights that particularly in Enfield Town, they are in close proximity to the existing gambling premises.

Figure 5: Map showing distribution of gambling premises and relevant leisure facilities

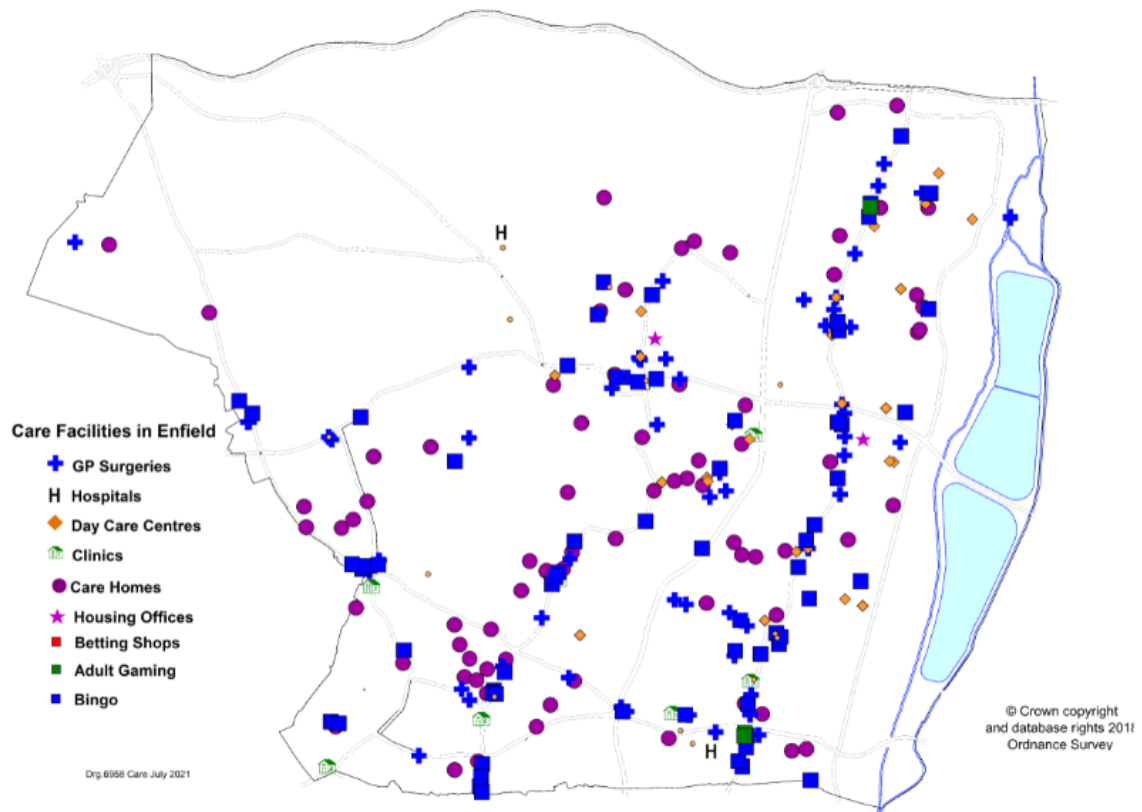


Source: Enfield Council GIS server February 2021

4.1.3 Relevant leisure facilities in Figure 5 are those that have been identified as being most appealing to those under 18, such as leisure centres, youth centres and parks. For the majority of the borough, the map shows that there are few facilities in close proximity to existing betting shops. An exception to this is the youth centre on the border of Southgate, and the leisure centre near around Edmonton Green shopping centre which appear to be in the near vicinity of gambling establishments.

Figure 6: Map showing distribution of gambling premises and medical facilities, care homes, and temporary accommodation etc.

Source: Enfield Council GIS server February 2021



4.1.4 Figure 6 shows the clinics in Fore Street, Edmonton and in Enfield Town are central to the locations of the gambling establishments in that area. The map also identifies that there are a larger number of care homes in Palmers Green and south of the North Circular, around the Green Lanes area, which appear to be relatively close to the multiple betting shops in those areas.

Figure 7: Map showing Areas of Deprivation and gambling premises

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Source: Indices of Deprivation 2019

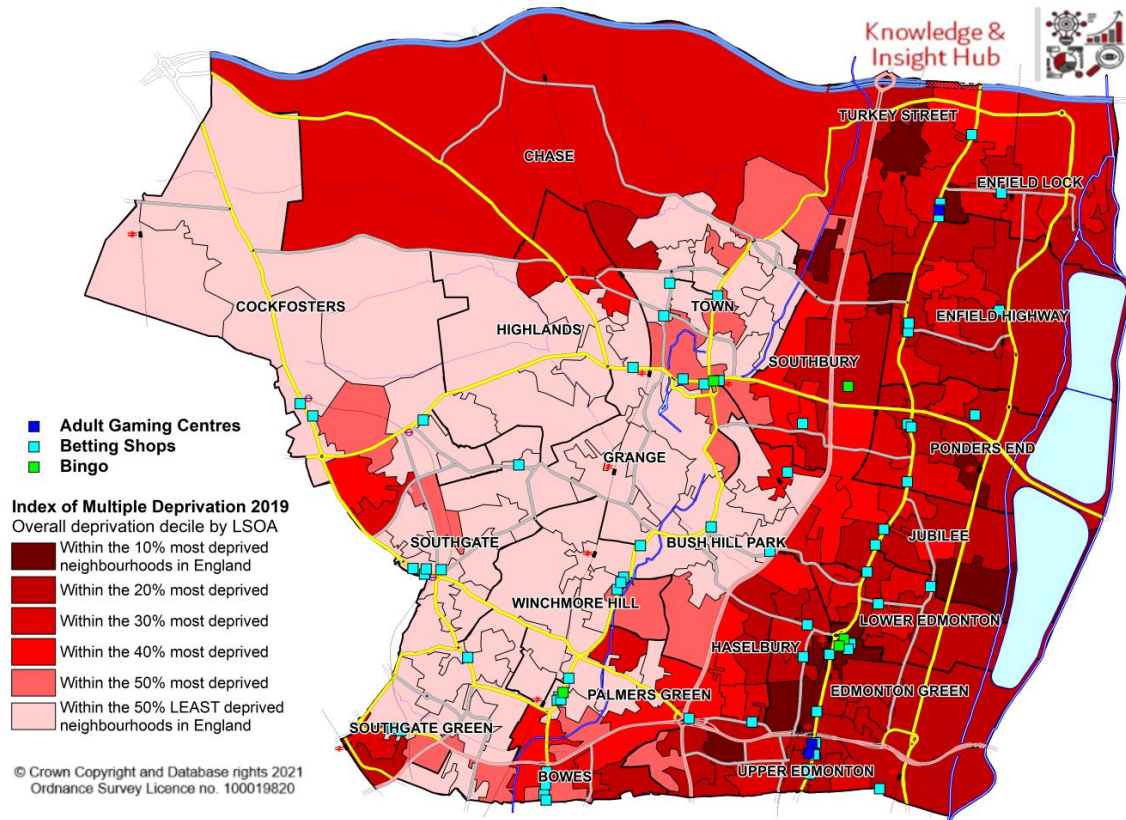
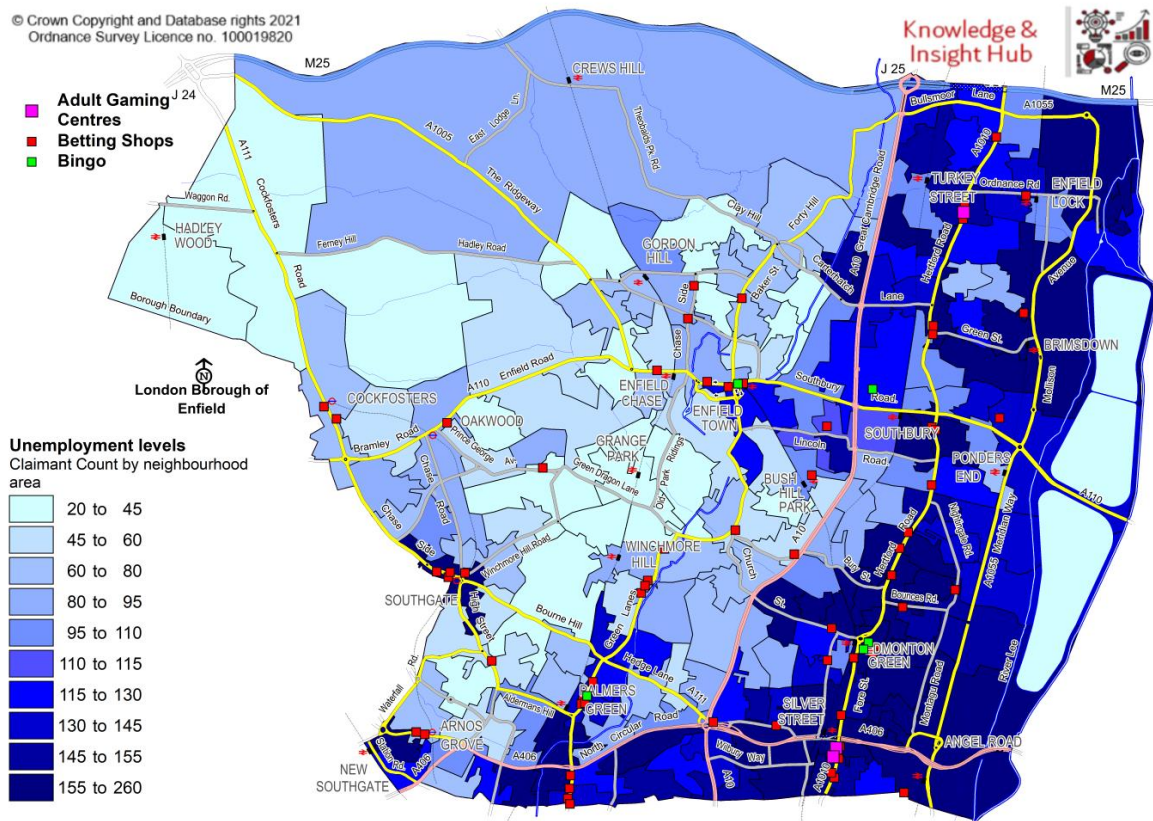


Figure 8: Map showing unemployment levels and gambling premises

Source: Office of National Statistics 2021

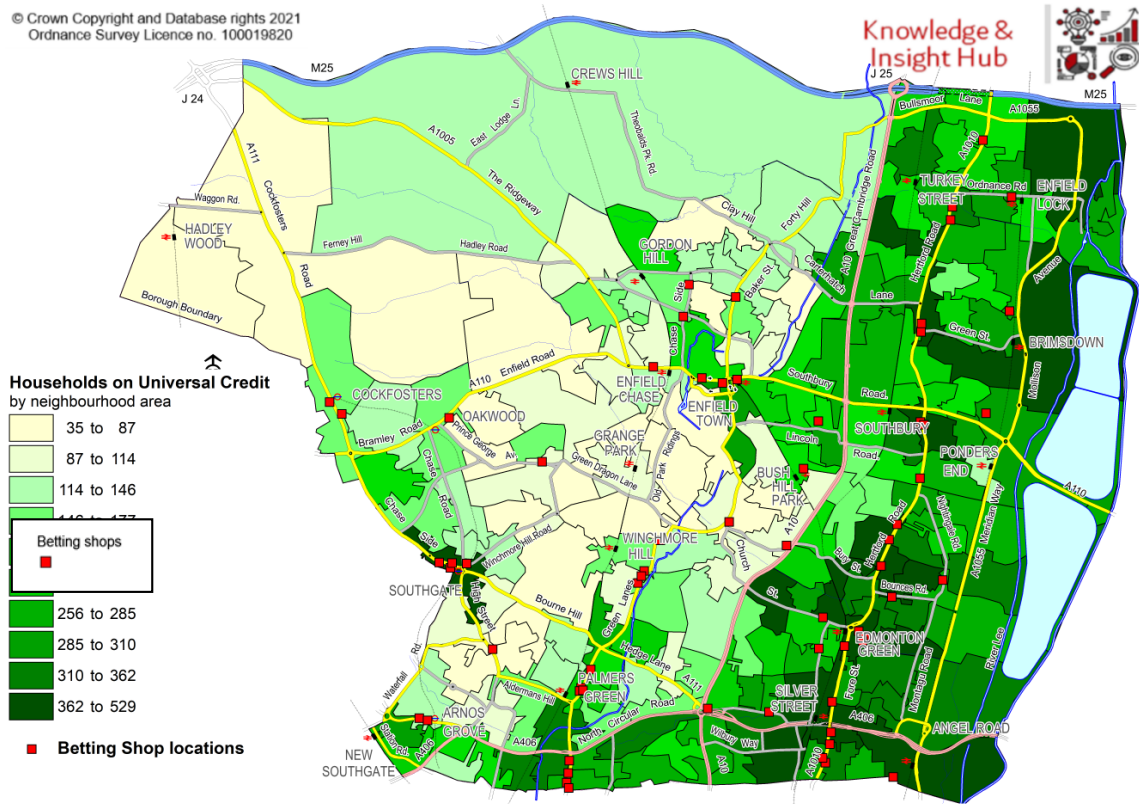


This thematic map shows the Claimant Count by LSOA Claimant Count is the number of people in the area who are claiming either Jobseekers' Allowance or unemployed claimants of Universal Credit. It does not include claimants of Employment and Support Allowance or Income Support.

Figure 9: Map showing concentration of households claiming Universal Credit and gambling premises

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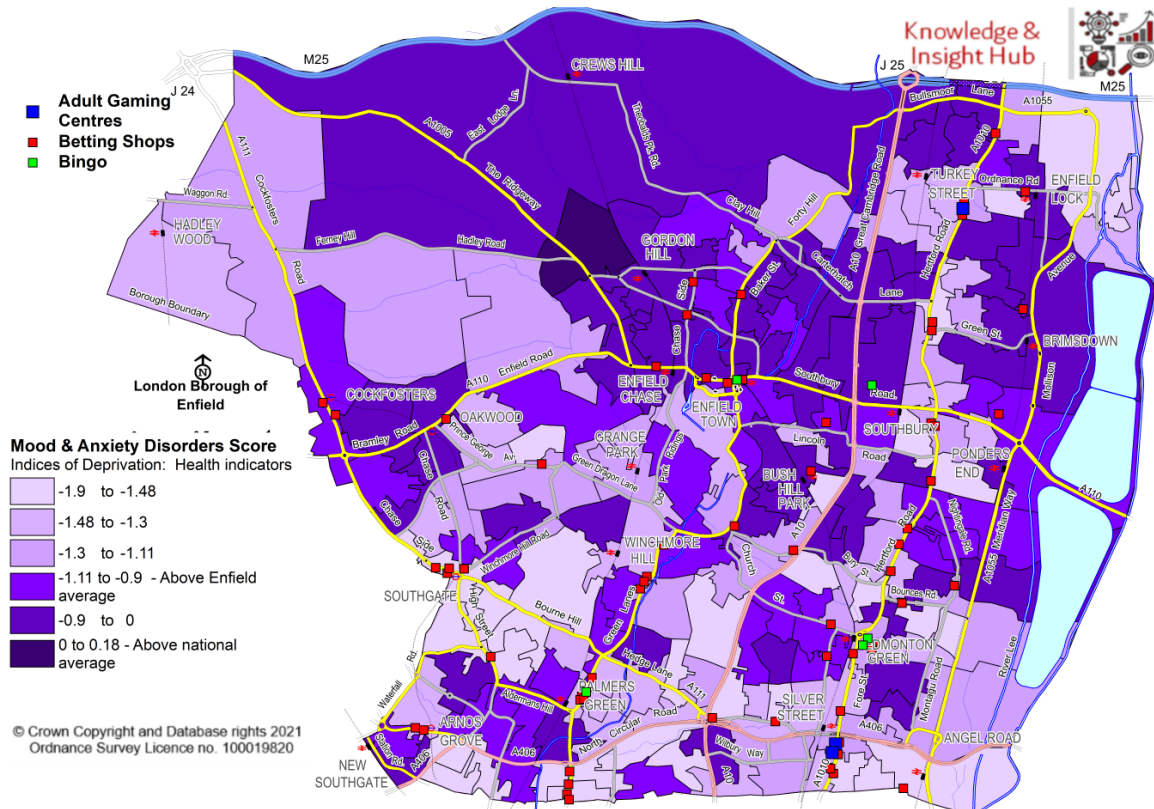
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Knowledge & Insight Hub



Figure 10: Map showing distribution of gambling premises and areas of poor mental health



Source: Indices of Deprivation 2019, Health domain, Indicator: Mood and Anxiety Disorders indicator. The mood and anxiety disorders indicator is a broad measure of levels of mental ill health in the local population. The definition used for this indicator includes mood (affective), neurotic, stress-related and somatoform disorders. A higher score for the indicator represents a higher level of deprivation. Part of this indicator contains public sector information licensed under the Open Government Licence v3.0. Part of this indicator uses Hospital Episodes Statistics. Hospital Episode Statistics Copyright © 2019

4.1.5 As an indication of the levels of poor mental health in the borough, Figure 10 has been produced. As the key indicates, areas range from those with the highest levels of mental health issues (dark purple) to those with the lowest levels (light purple). The borough shows a considerable range, and there are pockets of high levels to the north of the borough.

4.1.6 Figures 7 to 9 show maps of the areas of worst deprivation, highest unemployment rates and highest number of working age households claiming Universal Credit. The maps reflect a similar outcome: that the east of the borough is consistently worst affected. It highlights that there is a noticeable correlation between the areas with a higher concentration of betting shops and these areas.

Figure 11: All anti-social behaviour (ASB) Call hotspots in Enfield between April 2018 and March 2019 plotted around all gambling premises.

Source: LBE Community Safety Unit – Metropolitan Police records April 2018 to March 2019

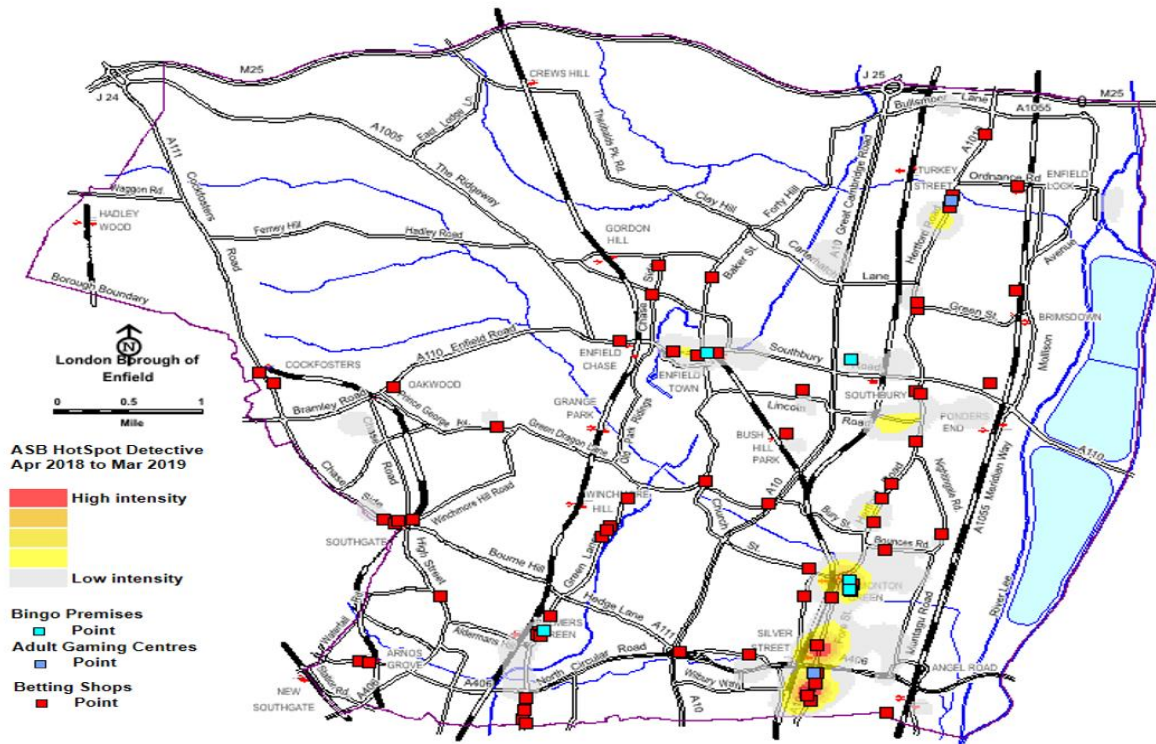


Fig 12: All anti-social behaviour (ASB) Call hotspots in Enfield between April 2019 and March 2020 plotted around all gambling premises.

Source: LBE Community Safety Unit – Metropolitan Police records April 2019 to March 2020

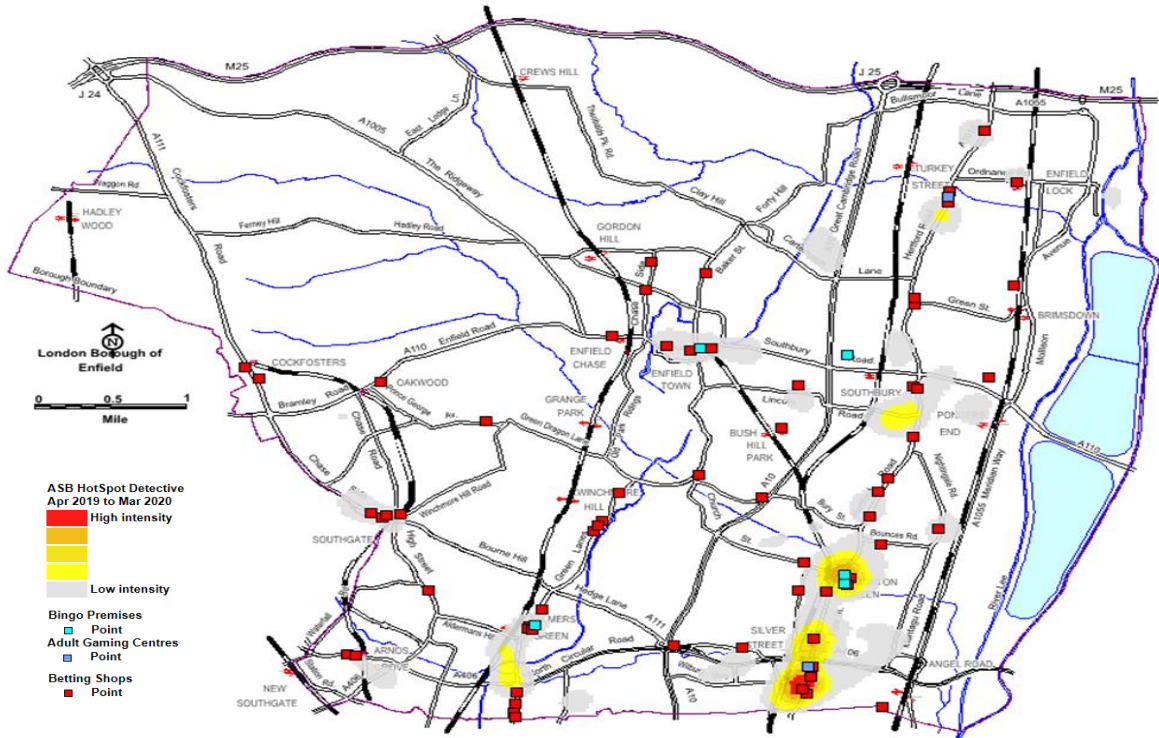
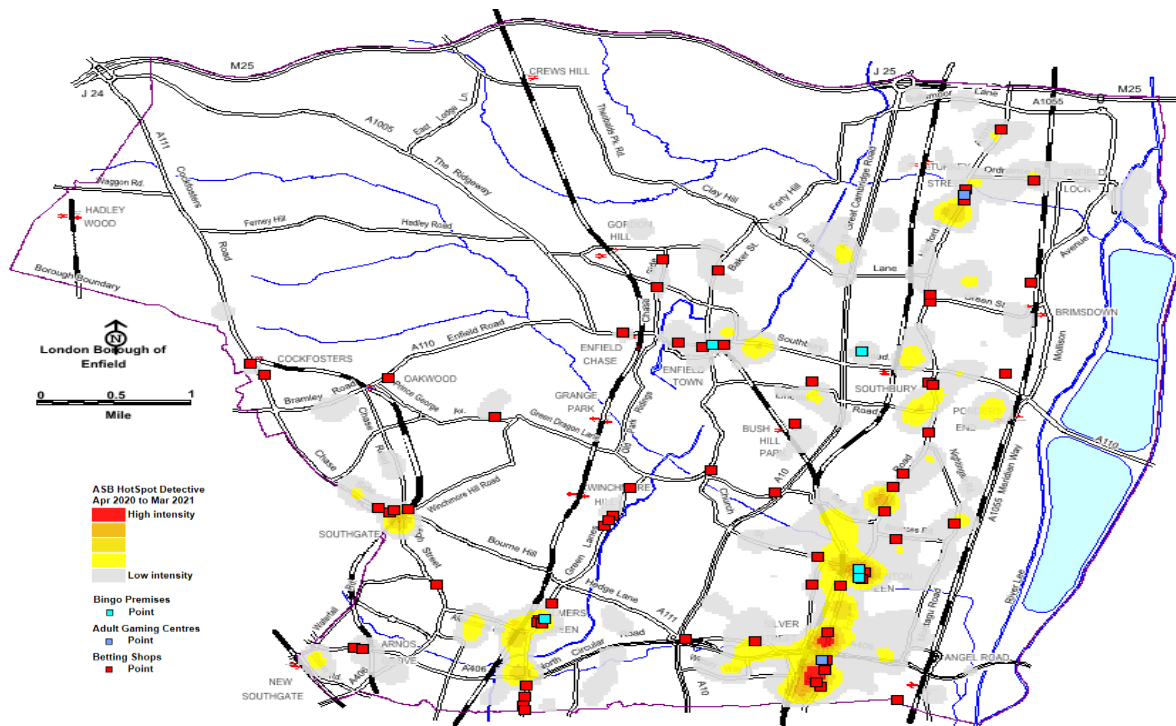


Fig 13: All anti-social behaviour (ASB) Call hotspots in Enfield between April 2020 and March 2021 plotted around all gambling premises.



Source: LBE Community Safety Unit – Metropolitan Police records April 2020 to March 2021

4.1.7 Since 2018, there has been an increase of ASB hotspots across the borough. A consistent ASB hotspot can be identified along Fore Street and around Edmonton Green Shopping Centre, which also has a higher concentration of gambling premises. It is also noted that there is an emerging ASB hotspot around Southgate town centre. In Fig 14, newer ASB hotspots have been identified which are not in close proximity to gambling premises.

Disclaimer: For this illustration the following tables show ASB calls recorded by Police as being with 20m of a licensed premises, so may not be directly attributed to the premises.

Fig 14: ASB calls recorded by the Police within 20 metres of a gambling premises, between March 2018 and April 2019

ASB Classification	ASB Reported - 2018/19	Proportions
Rowdy Or Inconsiderate Behaviour	43	63%
Trespass	8	12%
Begging / Vagrancy	7	10%
Veh Nuisance / Inappropriate Use	6	9%
Noise	1	1%
Veh Abandoned - Not stolen	1	1%
Fireworks	1	1%
Rowdy / Nuisance Neighbours	1	1%
Total	68	100%

Fig 15: ASB calls recorded by the Police within 20 metres of a gambling premises, between March 2019 and April 2020

ASB Classification	ASB Reported - 2019/20	Proportions
Rowdy Or Inconsiderate Behaviour	52	76%
Begging / Vagrancy	8	12%
Trespass	2	3%
Veh Abandoned - Not stolen	2	3%
Rowdy / Nuisance Neighbours	2	3%
Prostitution Related Activity	1	1%
Fireworks	1	1%
Total	68	100%

Fig 16: ASB calls recorded by the Police within 20 metres of a gambling premises, between March 2020 and April 2021

ASB Classification	ASB Reported - 2020/21	Proportions
Rowdy Or Inconsiderate Behaviour	63	84%
Begging / Vagrancy	5	7%
Rowdy / Nuisance Neighbours	4	5%
Noise	3	4%
Total	75	100%

4.1.8 In both 2018/19 and 2019/20, there were 68 ASB calls recorded by Police in proximity to licenced premises which accounts for approximately 1% of the total number of ASB calls recorded in the borough in the period. This compares to 75 ASB calls were recorded by Police in 2020/21 within in a 20m proximity to licenced premises, which accounts less than 1% of the ASB calls recorded by the Police in the year in Enfield over the year to March 2021. This is a 10% increase compared to the calls recorded in the year to March 2020 near licensed premises.

4.1.9 The period from 2020/21 includes the Covid 19 lockdown period when the population was largely at home and commercial premises were closed. All ASB increased in the borough by 80% by March 2021 when compared to the year before.

4.1.10 Rowdy or Inconsiderate Behaviour was consistently the most frequently recorded ASB classification type year on year since April 2018.

Responses to Gambling Policy Consultation

Key to Survey Questions asked:

- A. To what extent do you agree or disagree that the Statement of Principles is strong enough to prevent gambling premises being a source of crime?
- B. To what extent do you agree or disagree that the Statement of Principles does enough to protect children and vulnerable persons from harm?
- C. To what extent do you agree or disagree that the Statement of Principles is strong enough to ensure gambling is open and fair?
- D. Despite these legal limitations, please tell us if there is anything you would like the Council to be able to do regarding gambling premises?
- E. Please tell us if there is anything you would like the Council to be able to do in relation to advertising applications?
- F. Do you think the Council should continue with a 'no casinos' resolution for a further 3 years?
- G. If you have any other comments you would like to make regarding the policy, please let us know.

Response No.	Resident or Organisation?	To what extent do you agree to A – C above?	D - Comments on what you would like the Council to be able to do regarding gambling premises?	E – Comments on advertising applications	F – Agree to the “no casino” resolution?	G – Other comments regarding the policy
1	Resident	A – Strongly agree B - Strongly agree C – Strongly agree	Bring down the drugs and ASB around these premises.	N/A	N/A	N/A

Licensing Authority Response 1:

In the Local Area Profile, ASB hotspots have been identified, which supports the licensing objective "Preventing gambling from being a source of crime or disorder, being associated with crime or disorder or being used to support crime". The Policy outlines that LBE will use their powers where there is evidence of crime or disorder such as ASB or drugs that are associated with a gambling premises; such as imposition of licence conditions, to moderate the risks. The Council will not hesitate in dealing robustly where gambling premises do not meet any of the licensing objectives.

Licensing Authority Action 1:

No action required.

Response No.	Resident or Organisation?	To what extent do you agree to A – C above?	D - Comments on what you would like the Council to be able to do regarding gambling premises?	E – Comments on advertising applications	F – Agree to the “no casino” resolution?	G – Other comments regarding the policy
2	Organisation	A – Strongly agree B - Strongly agree C – Strongly agree	(1) To ensure that all premises are CCTV operated, if they are to be provided. (2) We know that premises are occupied daily and to prevent excessive use a set time to open and close between 9am and 6pm to ensure no late night gathering and noise nuisance to residents in the surrounding area. (3) The gambling licences should be limited to two/three per ward and or area within a three thousand mile radius.	N/A	Yes	N/A

Licensing Authority Response 2:

- (1) By undertaking compliance checks, LBE are aware that the gambling premises in Enfield have got CCTV systems in operation. Where necessary, the Responsible Authorities, i.e. the Police, do request that a CCTV condition be applied to the licence.
- (2) Within the current legislation through default conditions, there are time restrictions for some gambling premises, for example, betting shops may only be open between 7am and 10pm, but there are not default hours for all types of gambling premises. If there

is evidence of ASB or crime associated with a gambling premises (usually late at night or early hours of the morning), the remedial action available would be a review application with a view to reducing the hours. The review could be brought by residents or Responsible Authorities.

(3) The Gambling Act 2005 prohibits the Council from adopting any gambling policy to address the cumulative impact of betting shops 'clustering' together. There is some ability under Planning legislation and policies to deal with the concentration of gambling premises.

Licensing Authority Action 2:

No action required.

Response No.	Resident or Organisation?	To what extent do you agree to A – C above?	D - Comments on what you would like the Council to be able to do regarding gambling premises?	E – Comments on advertising applications	F – Agree to the “no casino” resolution?	G – Other comments regarding the policy
3	Resident	A – Strongly agree B - Strongly agree C – Neither agree or disagree	N/A	N/A	Yes	N/A

Licensing Authority Response 3:

Comments noted.

Licensing Authority Action 3:

No action required.

Response No.	Resident or Organisation?	To what extent do you agree to A – C above?	D - Comments on what you would like the Council to be able to do regarding gambling premises?	E – Comments on advertising applications	F – Agree to the “no casino” resolution?	G – Other comments regarding the policy
4	Resident	<p>A – Tend to disagree because there are too many loopholes and seemingly corruption which means these places get approved regardless of concerns or evidence.</p> <p>B - Tend to disagree because too many of these places are granted licences close to schools, colleges and MacDonald's.</p> <p>C – Tend to disagree because local residents concerns are ignored by the council, so they are unlikely to raise the concerns.</p>	Push to change the law so something can actually be done to reduce these damaging establishments.	They need to make sure people have time to see and object - the one locally was a tiny sign which went up just as we went into lock down so obviously no one saw it - if it had been posted on online forums etc it would have been seen and objections could be made in time - it was basically very underhand.	Yes	Casinos should be re defined to include the slot machine arcades.

Licensing Authority Response 4:

A – The Policy can only set out what is permitted within the Gambling Act legislation and guidance. The Gambling Act requires councils to ‘aim to permit’ licences for gambling premises unless they do not meet the licensing objectives, codes of practice or the Council’s Gambling Policy. This means that in practice there is little that Councils can do to address the concerns of residents. The Leader of Enfield Council has responded to the government’s review of the Gambling Act and written to the relevant Minister, proposing more ability for Councils to moderate gambling premises in their boroughs.

B – The Local Area Profile identifies locations of educational premises in relation to gambling premises (Fig 4), and gaming operators must reference these in their risk assessments for their premises. Responsible Authorities need to be satisfied that the risk assessments address the additional risks that such close proximity premises may involve. Section 3.1.2 of the Local Area Profile stipulates that any premises where children congregate including bus stops, cafés (which would include for example, Macdonald’s), shops, and any other place where children are attracted must be identified and considered in the risk assessment, especially within 400 metres of the proposed gambling premises (also see Section 3.1.7).

C – The Licensing Authority consider all residents’ concerns and complaints and are investigated accordingly. Residents will be advised of the current legal legislation if it prohibits the outcome that residents seek, so understand it is not always possible to give the outcome required. The Licensing Authority are mindful of the resident frustrations. This is addressed in the Leader’s response to the review of the Gambling Act and letter to the Minister as mentioned above.

D – Comments noted. Refer to response to A and C above.

E – Comments noted. The Licensing Authority ensure applications comply with existing advertising legislation and also comply with the legal consultations. The Licensing Authority will await the outcome of the review of the Gambling Act to see if the changes allows local authorities to extend the consultation requirements. Without these formal changes, the Licensing Authority would be acting beyond their powers to request/conduct additional advertising requirements. We will however look to set up email notifications of persons interested in receiving notifications of gambling licence applications.

G – Comments noted. The Gambling Act 2005 defines the legal definition of Casinos and Adult Gaming Centres gambling activity. Casinos are designed for larger capacity venues and have separate rules that apply. The Licensing Authority are permitted by the Gambling Act to pass a resolution not to allow casinos but are not authorised by the Act to pass a resolution to prohibit slot machines arcades.

Licensing Authority Action 4:

Review changes to the Gambling Act once published. No action required to the Policy.

Response No.	Resident or Organisation?	To what extent do you agree to A – C above?	D - Comments on what you would like the Council to be able to do regarding gambling premises?	E – Comments on advertising applications	F – Agree to the “no casino” resolution?	G – Other comments regarding the policy
5	Resident	<p>A – Strongly agree</p> <p>B - Strongly agree</p> <p>C – Strongly agree</p>	<p>(1) The Merkur Slots situation has clearly shown that public consultation has been minimal. The majority of local residents and businesses were unaware that the site would be used to establish a large, 24- hour gambling site. Whilst local authorities are in a position where they cannot refuse the establishment of a gambling premises, I wonder if there is scope to have: the process delayed, questioned, local people consulted, and their views considered - rather than just saying there is a direction of inevitability about the matter. Individuals seeking planning permission for changes to their properties can face years of delay by local authorities - gambling companies do not.</p> <p>(2) It is also unclear to me as to what grounds a gambling premises licence can be withdrawn. Nightclubs regularly lose their licences in other boroughs where there is evidence of noise, affray and anti-social behaviour caused by nightclub customers.</p>	<p>People do not read local newspapers anymore. So, legally we are collectively sleepwalking into a tick box exercise. People do not tend to read A4 size notices on empty shops. Is there a restriction as to the size of the notice that the council are expected to display on the premises? The Council can engage in and make better use of social media to alert residents. Most local residents found out about the Merkur slots development through the social media sites that they have set up between themselves. Time for the Council to join the 21st century in the promulgation of information. The Council has adopted a passive 'we do things this way and people can look at our website to find out' Most people with jobs and families do not have the time to</p>	Yes	<p>I wonder why the Council can implement a 'no casino' resolution, but cannot take local people's consideration when it comes to a proliferation of slot gambling premises?</p>

				trawl through council notices looking out for the possibility that there will be an adverse development amongst hundreds of yearly notices. Clearly gambling premises are not welcome by local people in Enfield and clearly there is the opportunity for the Council to be less passive in how it communicates such matters.		
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Licensing Authority Response 5:

D - (1) Comments noted. See response to Licensing Authority Response 4 (E).

(2) Section 5.6 of the Policy provides information on the Review process, which could result in revocation of a licence.

E - See Response to D (1) above.

F – As mentioned in the responses above, Section 166(1) of the Gambling Act 2005 states that a licensing authority may resolve not to issue casino premises licences. The policy statement must reflect the ‘aim to permit’ principle (s.153 of the Act) and should not comment on whether there is demand for gambling premises.

Licensing Authority Action 5:

Review changes to the Gambling Act once published. No action required to the Policy.

Response No.	Resident or Organisation?	To what extent do you agree to A – C above?	D - Comments on what you would like the Council to be able to do regarding gambling premises?	E – Comments on advertising applications	F – Agree to the “no casino” resolution?	G – Other comments regarding the policy
6	Resident	A – Strongly disagree because there are hardly any restrictions prohibiting companies from being granted a licence. B - Strongly disagree C – Strongly disagree	(1) Inform the local residents so they are able to object. (2) Put in place more Cctv in the surrounding area so that locals feel safer.	N/A	Yes	N/A

Licensing Authority Response 6:

A – See response Licensing Authority Response 4 (A).

D - (1) Comments noted. See response to Licensing Authority Response 4 (E).

(2) There is a comprehensive network of public CCTV cameras in the borough. Requests for ad-hoc mobile street cameras (dome hawks) can be considered by the Police/LBE Community Safety Team, and requests are successful if sufficient evidence is submitted.

Licensing Authority Action 6:

No action required to the Policy.

Response No.	Resident or Organisation?	To what extent do you agree to A – C above?	D - Comments on what you would like the Council to be able to do regarding gambling premises?	E – Comments on advertising applications	F – Agree to the “no casino” resolution?	G – Other comments regarding the policy
7	Ward Councillor	N/A	N/A	N/A	N/A	<p>(1) "I cannot understand 4.1.8. The final sentence reads, ""With the exception of Enfield Town, there are no more than two betting shops in the western commercial areas, but significantly more in the eastern commercial areas." This sentence is clearly untrue, and it doesn't seem to relate the earlier part of the paragraph. I hope that item can be clarified.</p> <p>(2) I also have a couple of questions which relate to our policies and the recent application in Green Lanes (Palmer's Green ward). 2.4.2. - says that the council will give careful consideration to premises at a list of locations which include Recreational areas, particularly those catering for young persons. Also 3.1.2. refers to Any premises where children congregate including bus stops, cafés, shops, and any other place where children are attracted; I know that the proximity of a bus stop was considered material but recall no mention of the nearby MacDonald's restaurant which attracts large numbers of young people. Was the MacDonald's also considered?"</p>

Licensing Authority Response 7:

- (1) Agree to amend 4.1.8 (now Section 4.1.7 in the Local Area Profile document) as there is no obvious correlation between the highest levels of mental health with locations of gambling premises in the updated data.
- (2) The policy does set out that businesses must reference premises in their risk assessments for their premises, as per the examples in Section 3.1.2 of the Local Area Profile document. Responsible Authorities need to be satisfied that the risk assessments address the additional risks that introducing a gambling premises in close proximity to such premises may involve. In the premises review that was mentioned, the bus stop and McDonalds were raised and considered.

Licensing Authority Action 7:

Amended 4.1.8 (now 4.1.7) text.

Response No.	Resident or Organisation?	To what extent do you agree to A – C above?	D - Comments on what you would like the Council to be able to do regarding gambling premises?	E – Comments on advertising applications	F – Agree to the “no casino” resolution?	G – Other comments regarding the policy
8	Organisation	N/A	N/A	N/A	N/A	Within the last paragraph of the LA Profile (4.1.11), the following quote is factually incorrect: "The majority of betting shops were victims of Criminal Damage (45%), followed by Violence against the Person (36%)". Clearly, the majority of betting shops (55%) did not suffer criminal damage, so the wording should be changed, possibly along the lines of "the most common crime was criminal damage against the premises (45%)".

Licensing Authority Response 8:

The Police data has now been updated with new statistics therefore the former section 4.1.11 of the Local Area Profile has been removed.

Licensing Authority Action 8:

No action required.

Response No.	Resident or Organisation?	To what extent do you agree to A – C above?	D - Comments on what you would like the Council to be able to do regarding gambling premises?	E – Comments on advertising applications	F – Agree to the “no casino” resolution?	G – Other comments regarding the policy
9	Organisation - Betting and Gaming Council (BGC)	N/A	N/A	N/A	N/A	See below.

Comments, Licensing Authority Responses and Licensing Authority Actions 9:

Comment 1: Paragraph 1.12 is headed “Gambling Prevalence and Problem Gambling.” This section should be removed from the draft statement of principles. The purpose of the statement of principles is to *“set out the principles the council proposes to apply in exercising its licensing functions when dealing with applications for Premises Licences, as required by the Act”* as stated in paragraph 1.1. It is not to give a commentary on research and certainly not to cherry pick statistics which are given out of context.

The entire section 1.12 should therefore be removed. Its inclusion is pejorative and is inconsistent with both the purpose of the statement of principles and the “aim to permit” principle contained within s153 Gambling Act 2005.

If the section is to remain then the figures given must be given context. Whilst this section repeats the executive summary of the report (Natcen – Gambling Behaviour in Great Britain in 2015) and quotes the DSM-IV and PGSI as measurement instruments, it does not repeat the caveats in the same research that, *“The PGSI has been validated on a Canadian population. It has not been validated in Britain. The DSM-IV criterion was developed as a diagnostic tool and has not been validated for use with the general population.”*

Response 1: Comments noted. The Licensing Authority are mindful of the Gambling Commission’s Guidance to Local Authorities which on the National Strategy to Reduce Gambling Harms and are of the view that this information should still be signposted but acknowledge the statistics can be removed.

Action 1: Statistics in 1.12 removed and alternatively signposted to Natcen and Gamcare websites.

Comment 2: Similarly, paragraph 2.6.7 which refers to research in Manchester and Westminster that “*identified the following groups as more vulnerable*” should give more context. The paragraph lists “vulnerable” groups. People within those groups may be vulnerable where they do engage in gambling but context is all important. Otherwise, a misleading impression is given.

In Geofutures’ publication, “Exploring area-based vulnerability to gambling harm; Who is vulnerable?” the author, Heather Wardle states, “*where both adults and children of Asian backgrounds were far less likely to gamble than their White British counterparts, yet those that did were more likely to experience problems.*” The same research piece stated, “*The evidence relating to household income and gambling harms is mixed, showing that generally those of lower income are less likely to gamble but those that do spend a higher proportion of their income on gambling. This was highlighted as a concern given the (likely) lesser ability of lower income households to protect themselves from financial instability (Brown et al, 2011). However, as stakeholders noted, there is some unease about labelling all low income households as vulnerable as income, gambling, debt and money management are likely to interact to shape outcomes.*”

Response 2: Comments noted.

Action 2: Amended paragraph 2.6.7 to reflect the comments made.

Comment 3: Paragraph 6.2.3 (under the heading “Risk Assessments”) gives a list of examples of matters that the council expects operators to take into account when making their risk assessment. This list should be redrafted to exclude matters that are not relevant to an assessment of risk to the licensing objectives. For example, “*Known problems in the area such as problems arising from street drinkers, youths participating in anti-social behaviour, drug dealing activities, etc*” should be removed as none of these issues have any relevance to an assessment of risk to the licensing objectives.

Similarly, “*gaming trends that may reflect benefit payments*” should be removed unless it is the council’s view that any person in receipt of benefits is either vulnerable or their gambling is likely to be a source of crime and disorder, associated with crime or disorder or being used to support crime.

Response 3: Comments noted. The Licensing Authority are satisfied that the above examples should be included in the risk assessments.

Action 3: No action required.

Comment 4: The Gambling Local Area Profile appended to the draft statement of principles should also be redrafted to remove matters that have no relevance to an assessment of risk to the licensing objectives. Paragraphs 3.1.2 and 3.1.2 both contain lists of bullet points detailing matters that the council expects to be considered in the context of a risk assessment. Once again, these lists contain issues with no relevance at all such as youths participating in ASB, graffiti/tagging, underage drinking etc. The gaming trends that may reflect benefit payments has been expanded in paragraph 3.1.2 to include “pay days”. This should be removed for the reasons given above.

Response 4: Comments noted. The Licensing Authority are satisfied that the above examples should be included in the risk assessments.

Action 4: No action required.

Comment 5: Finally, whilst it is accepted that buildings used for religious purposes may cater for people who may be vulnerable, “matters of faith” are certainly not relevant to an assessment of risk to the licensing objectives and should be removed from the list of bullet points.

Response 5: Comments noted.

Action 5: Places of worship have been removed from the Local Area Profile document.

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Enfield Equality Impact Assessment (EqIA)

Introduction

The purpose of an Equality Impact Assessment (EqIA) is to help Enfield Council make sure it does not discriminate against service users, residents and staff, and that we promote equality where possible. Completing the assessment is a way to make sure everyone involved in a decision or activity thinks carefully about the likely impact of their work and that we take appropriate action in response to this analysis.

The EqIA provides a way to systematically assess and record the likely equality impact of an activity, policy, strategy, budget change or any other decision.

The assessment helps us to focus on the impact on people who share one of the different nine protected characteristics as defined by the Equality Act 2010 as well as on people who are disadvantaged due to socio-economic factors. The assessment involves anticipating the consequences of the activity or decision on different groups of people and making sure that:

- unlawful discrimination is eliminated
- opportunities for advancing equal opportunities are maximised
- opportunities for fostering good relations are maximised.

The EqIA is carried out by completing this form. To complete it you will need to:

- use local or national research which relates to how the activity/ policy/ strategy/ budget change or decision being made may impact on different people in different ways based on their protected characteristic or socio-economic status;
- where possible, analyse any equality data we have on the people in Enfield who will be affected e.g. equality data on service users and/or equality data on the Enfield population;
- refer to the engagement and/ or consultation you have carried out with stakeholders, including the community and/or voluntary and community sector groups you consulted and their views. Consider what this engagement showed us about the likely impact of the activity/ policy/ strategy/ budget change or decision on different groups.

The results of the EqIA should be used to inform the proposal/ recommended decision and changes should be made to the proposal/ recommended decision as a result of the assessment where required. Any ongoing/ future mitigating actions required should be set out in the action plan at the end of the assessment.

The completed EqIA should be included as an appendix to relevant EMT/ Delegated Authority/ Cabinet/ Council reports regarding the service activity/ policy/ strategy/ budget change/ decision. Decision-makers should be confident that a robust EqIA has taken place, that any necessary mitigating action has been taken and that there are robust arrangements in place to ensure any necessary ongoing actions are delivered.

SECTION 1 – Equality Analysis Details

Title of service activity / policy/ strategy/ budget change/ decision that you are assessing	LBE Statement of Principles (generally referred to as the Gambling Policy)
Lead officer(s) name(s) and contact details	Ellie Green: ellie.green@enfield.gov.uk, 0208 1322 128
Team/ Department	Licensing Team/Business Regulation
Executive Director	Sarah Cary
Cabinet Member	Cllr Savva
Date of EqIA completion	2 November 2021

SECTION 2 – Summary of Proposal

Please give a brief summary of the proposed service change / policy/ strategy/ budget change/project plan/ key decision

Please summarise briefly:

What is the proposed decision or change?

What are the reasons for the decision or change?

What outcomes are you hoping to achieve from this change?

Who will be impacted by the project or change - staff, service users, or the wider community?

Licensing authorities are required by the Gambling Act 2005 to publish a Statement of Principles that they propose to apply when exercising their functions under the 2005 Act. The Statement of Principles must be published at least every three years and can be reviewed from “time to time” with any amended parts re-consulted upon. The 2022-2025 Statement of Principles has been circulated for public consultation for a period of 8 weeks.

The objective of the Statement of Principles is to inform applicants and interested parties of the principles the licensing authority proposes to apply when exercising its functions under the Gambling Act 2005. The authority must have regard to the licensing objectives as set out in section 1 of the Act:

- Preventing gambling from being a source of crime and disorder, being associated with crime or disorder or being used to support crime;

- Ensuring gambling is conducted in a fair and open way;
- Protecting children and other vulnerable persons from being harmed or exploited by gambling.

The licensing authority aims to permit the use of premises for gambling:

- In accordance with any relevant Code of Practice issued by the Gambling Commission.
- In accordance with any guidance issued by the Gambling Commission
- Reasonably consistent with the licensing objectives
- In accordance with the Authority's Statement of Principles.

From April 2016 gambling operators must conduct local risk assessments for their premises to demonstrate that they understand local issues and to show what measures they propose to introduce to mitigate against the risk of harm to children and vulnerable persons. (Gambling Commission's Licensing Conditions and Codes of Practice responsibility code provision 10.1.1).

The Gambling Commission's Licence Conditions and Codes of Practice and Social Responsibility Code Provisions state that licensees must review (and update as necessary) their local risk assessments:

- a. to take account of significant changes in local circumstance, including those identified in this policy;
- b. when there are significant changes at a licensee's premises that may affect their mitigation of local risks;
- c. when applying for a variation of a premises licence; and
- d. in any case, undertake a local risk assessment when applying for a new premises licence.

The council will expect the local risk assessment to consider the urban setting:

- The proximity of the premises to schools.
- Whether the premises is in an area of deprivation.
- Whether the premises is in an area subject to high levels of crime and/or disorder.
- The ethnic profile of residents in the area.
- The demographics of the area in relation to vulnerable groups.
- The location of services for children such as schools, playgrounds, toy shops, leisure centres and other areas where children will gather.
- The range of facilities in the local area such as other gambling outlets and entertainment type facilities.

The local risk assessment should show how vulnerable people, including people with gambling dependencies, are protected:

- The training of staff in brief intervention when customers show signs of excessive gambling, the ability of staff to offer brief intervention and how the manning of premises affects this.
- Information held by the licensee regarding self-exclusions and incidences of underage gambling.
- Arrangements in place for local exchange of information regarding self-exclusion and gaming trends.
- Gaming trends that may mirror days for financial payments such as pay days or benefit payments.

- Arrangements for monitoring and dealing with under-age persons and vulnerable persons, which may include dedicated and trained personnel, leaflets, posters, self-exclusion schemes, window displays and advertisements not to entice passers-by etc.
- The provision of signage and documents relating to games rules, gambling care providers and other relevant information,
- The proximity of premises that may be frequented by vulnerable people such as hospitals, residential care homes, medical facilities, and doctor surgeries.

The local risk assessment should show how children are to be protected:

- The proximity of institutions, places or areas where children and young people frequent such as schools and entertainment venues.
- The proximity of places where children congregate such as bus stops, cafes, shops etc.

Other matters that the risk assessment may include:

- Details as to the location and coverage of working CCTV cameras, and how the system will be monitored.
- The layout of the premises so that staff have an unobstructed view of persons using the premises.
- The number of staff that will be available on the premises at any one time. If at any time that number is one, confirm the supervisory and monitoring arrangements when that person is absent from the licensed area or distracted from supervising the premises and observing those persons using the premises.
- Where the application is for a betting premises licence, the location and extent of any part of the premises which will be used to provide facilities for gambling in reliance on the licence.

Such information may be used to inform the decision the council makes about whether to grant the licence, to grant the licence with special conditions or to refuse the application.

The Statement of Principles does not preclude any application being made and each application will be decided on its merits, with the onus being upon the applicant to show how the concerns can be overcome.

There are 79 licensed gambling premises within the district; these currently consist of 5 bingo premises, 3 adult gaming centres and 71 betting shops. These are located across the borough with concentrations in certain areas.

The Statement of Principles supports a culture of openness where appropriate information can be accessed by all parties, hearings are generally held in public and enforcement is in line with the principles promoted within the council's enforcement policy. Partnership working and exchange of information (within legal constraints) is also supported by the Statement of Principles. In this way we hope to promote understanding between those providing gambling opportunities and those potentially affected by them.

One of the key purposes of the Statement of Principles is to assess gambling related harm and locations that have been identified as more vulnerable to problem-gambling and ensuring that gambling premises operators and applicants for new

licences must use Enfield's data-backed Local Area Profile to identify local risks and state what control mechanisms they will employ. The Local Area Profile identifies hotspots in areas deemed more vulnerable but does not exclude areas that are not considered vulnerable.

What are the main gambling-related harms and the impacts of these?

Gambling related harms are defined as "the adverse impacts from gambling on the health and wellbeing of individuals, families, communities and society". Problem gambling is defined by the Gambling Commission as gambling "to a degree that compromises, disrupts or damages family, personal or recreational pursuits".¹

In accordance with the Gambling Commissions recent gambling harms framework and previous publications, the types of harms that have been considered as part of the local area profile detailed below are as follows:²

- Gambling associated crime (acquisitive and those at a gambling premises)
- Unemployment, financial stress and income deprivation
- Health issues
- Children being exposed to gambling (accidental or otherwise).

What is changing in the Statement of Principles review?

The purpose of Enfield's Local Area Profile document is to identify the areas most vulnerable to gambling-related harm. Enfield, as the licensing authority, has modelled where such risks might be more acute to certain areas versus others. This has included an assessment of the key characteristics of the borough to identify areas of higher risk of vulnerability to gambling-related harm.

The Local Area Profile has been devised from a data-led analysis of the borough of Enfield. The data used covers a range of information including the location of educational establishments and leisure services, medical facilities, and care homes, through to areas of income and employment deprivation, as some examples. The source for these examples were extracted from Enfield Council GIS server in February 2021. ASB data has also been sourced from the Metropolitan Police Service.

The Local Area Profile has been in place since the 2016 Statement of Principles was introduced, and that data has been updated on each review of the policy since and again ahead of the 2022 policy publication.

The Equalities Impact Assessment has attempted to assess the likely impact of the revised policy on persons living, visiting and working within Enfield.

¹ <https://www.gamblingcommission.gov.uk/statistics-and-research/publication/problem-gambling-vs-gambling-related-harms>

² <https://www.gamblingcommission.gov.uk/statistics-and-research/publication/problem-gambling-vs-gambling-related-harms>

This Statement of Principles is set to have a positive impact aligning with the priorities of Enfield Council including, but not limited to, safe, healthy and confident communities. This report gives a thorough assessment of the impact on equality within Enfield Borough that the implementation of this Statement of Principles may have.

SECTION 3 – Equality Analysis

This section asks you to consider the potential differential impact of the proposed decision or change on different protected characteristics, and what mitigating actions should be taken to avoid or counteract any negative impact.

According to the Equality Act 2010, protected characteristics are aspects of a person's identity that make them who they are. The law defines 9 protected characteristics:

1. Age
2. Disability
3. Gender reassignment.
4. Marriage and civil partnership.
5. Pregnancy and maternity.
6. Race
7. Religion or belief.
8. Sex
9. Sexual orientation.

At Enfield Council, we also consider socio-economic status as an additional characteristic.

“Differential impact” means that people of a particular protected characteristic (e.g. people of a particular age, people with a disability, people of a particular gender, or people from a particular race and religion) will be significantly more affected by the change than other groups. Please consider both potential positive and negative impacts, and, where possible, provide evidence to explain why this group might be particularly affected. If there is no differential impact for that group, briefly explain why this is not applicable.

Please consider how the proposed change will affect staff, service users or members of the wider community who share one of the following protected characteristics.

Age

This can refer to people of a specific age e.g. 18-year olds, or age range e.g. 0-18 year olds.

Will the proposed change to service/policy/budget have a **differential impact [positive or negative]** on people of a specific age or age group (e.g. older or younger people)?

Please provide evidence to explain why this group may be particularly affected.

There are nearly 75,920 children (0-15) living in the borough of Enfield. This represents 22.8% of Enfield's total population and is higher than the 19.1% national average.³

Research conducted by the Gambling Commission has identified that young people and students, based on their age, are at a higher risk to gambling-related harm and problem gambling. In Enfield, there are 19,892 15 to 19-year olds, and 18,167 20 to 24-year olds, a total of 11.4% of Enfield's population. These age ranges are considered the ages of young people who are of working age but may be NEET (not in employment, education or training).⁴

The changes to the Statement of Principles will create a positive result for young people and students who are more at risk of developing gambling-related problems or suffering from gambling-related harm. The Local Area Profile is based on multiple factors including assessing the proximity of education institutions with students of 13-24 years (secondary schools and colleges) and entertainment venues to gambling premises. This highlights the scale and nature of the risks to these age groups. The risk assessment that the premises will complete will ensure they consider control mechanisms such as using a proof of age scheme and door supervisors or altering the gambling operation such as how the premises is advertising and what marketing materials targeted to young people they may have in, or on the outside of the premises. Children, young people and vulnerable people can see into the premises and see gambling taking place therefore considerations must also be given as to the design and layout (internal and external) of the premises.

Although young people and students are considered at a higher possible risk to gambling-related harm, not all young people and students will suffer, or be at risk, of suffering harm. The Statement of Principles change will not increase the chance of people not previously considered to be at risk to succumb to gambling-related harm as a result of its implementation.

Measures are stated in the Statement of Principles that will help protect vulnerable and young people as the protection of children and vulnerable persons from harm is one of the licensing objectives.

³ ONS mid-year estimates 2020

⁴ <https://www.gamblingcommission.gov.uk/statistics-and-research/publication/exploring-the-gambling-journeys-of-young-people>

Mitigating actions to be taken
None required.

Disability

A person has a disability if they have a physical or mental impairment which has a substantial and long-term adverse effect on the person's ability to carry out normal day-day activities.

This could include:

Physical impairment, hearing impairment, visual impairment, learning difficulties, long-standing illness or health condition, mental illness, substance abuse or other impairments.

Will the proposed change to service/policy/budget have a **differential impact [positive or negative]** on people with disabilities?

Please provide evidence to explain why this group may be particularly affected.

At the 2011 Census, 47,979 Enfield residents (15.4% of the total) reported a long-term health problem or disability, this means people whose day-to-day activities are limited a lot or a little by a disability or long-term medical condition. 52.5% of people with a disability or long-term health problem were of working age (16-64 years).⁵

Research by NatCen in the Gambling Behaviour in Great Britain in 2015 states that problem gambling rates were higher among those who were economically inactive for reasons other than unemployment, full-time study or retirement (such as long-term illness or disability, or were looking after the family home).⁶

A large proportion of mental health problems are considered to be a form of disability under the Equality Act 2010 if they have a long-term effect on the individual's normal day-to-day activity. It is considered that people who suffer from such disabilities may be more at risk, however, in this case it is likely to be people with mental disabilities who are at risk of gambling-related harm or problem gambling based on this characteristic.⁷

The changes to the Statement of Principles will have a positive impact on people considered to have a disability under the Equalities Act 2010. The Local Area Profile is informed by data that considers that people with a disability may frequent, such as locations of medical facilities, care homes and temporary accommodation.

Therefore, the implementation of the proposed Statement of Principles changes, for

⁵ <https://new.enfield.gov.uk/services/your-council/borough-and-wards-profiles/borough-profile-2021-your-council.pdf>

⁶ <https://natcen.ac.uk/media/1464625/gambling-behaviour-in-great-britain-2015.pdf>

⁷ <https://www.legislation.gov.uk/ukpga/2010/15/section/6>

operators of licensed premises to have due regard of the Local Area Profile, will help reduce the risk of vulnerable people developing gambling-related problems because through the completion of risk assessments, licensed premises will have an improved understanding and focus on local risks and mitigating gambling-related harm.

This will mean that operators will need to consider the implementation of strategies to mitigate this, for example, increasing staff levels and the requirement of staff training to help staff members spot and help people who may be vulnerable due to a disability.

This Statement of Principles will therefore have a positive impact on people with this protected characteristic.

It is important to note, that not all people who have a form of disability are likely to or will suffer from problem gambling or succumb to gambling-related harm.

Mitigating actions to be taken

Measures are stated in the Statement of Principles that will help protect vulnerable people, which includes those with a disability.

Gender Reassignment

This refers to people who are proposing to undergo, are undergoing, or have undergone a process (or part of a process) to reassign their sex by changing physiological or other attributes of sex.

Will this change to service/policy/budget have a **differential impact [positive or negative]** on transgender people?

Please provide evidence to explain why this group may be particularly affected.

It is unlikely that the Statement of Principles will lead to differential impact for people based on this protected characteristic because the policy has no particular impact on gender reassignment.

Mitigating actions to be taken

None required.

Marriage and Civil Partnership

Marriage and civil partnerships are different ways of legally recognising relationships. The formation of a civil partnership must remain secular, where-as a marriage can be conducted through either religious or civil ceremonies. In the U.K both marriages and civil partnerships can be same sex or mixed sex. Civil partners must be treated the same as married couples on a wide range of legal matters.

Will this change to service/policy/budget have a **differential impact [positive or negative]** on people in a marriage or civil partnership?

Please provide evidence to explain why this group may be particularly affected

The Gambling Commission research on problem gambling behaviour concluded that people with gambling problems often experience relationship breakdowns.⁸

From October 2020 to October 2021, MPS data suggested that there were 6,282 Domestic Abuse Incidents and 4,019 Domestic Abuse Offences in the borough of Enfield. These offences range from common assault, criminal damage, affray, actual bodily harm, grievous bodily harm, sexual offences and other offences.⁹

⁸ <https://www.gamblingcommission.gov.uk/statistics-and-research/publication/problem-gambling-vs-gambling-related-harms>

⁹ <https://www.london.gov.uk/what-we-do/mayors-office-policing-and-crime-mopac/data-and-statistics/domestic-and-sexual-violence-dashboard>

Although not all of these domestic-violence related crimes will be related to behavioural characteristics brought on by problem gambling, a proportion of these crimes may be linked to relationship breakdowns with gambling problems as a contributing factor.

It is unlikely that the proposal will lead to differential impact for people based on this protected characteristics.

Mitigating actions to be taken

None required.

Pregnancy and maternity

Pregnancy refers to the condition of being pregnant or expecting a baby. Maternity refers to the period after the birth and is linked to maternity leave in the employment context. In the non-work context, protection against maternity discrimination is for 26 weeks after giving birth, and this includes treating a woman unfavourably because she is breastfeeding.

Will this change to service/policy/budget have a **differential impact [positive or negative]** on pregnancy and maternity?

Please provide evidence to explain why this group may be particularly affected

The population of Enfield is increasing, and people are living longer. Despite a previous gradual decline of births between 2015 (5,127 births) and 2019 (4,261 births), the number of births is on the rise again. The population of Enfield is growing older as the number of people aged 65 and over is set to increase by 25% by 2030, whereas the population of 0 – 14-year olds is set to decrease by 13%.¹⁰

It is unlikely that the proposal will lead to differential impact for people based on this protected characteristic because the policy has no particular impact on pregnancy or maternity.

¹⁰ <https://new.enfield.gov.uk/healthandwellbeing/topics/demography/>

Mitigating actions to be taken

None required.

Race

This refers to a group of people defined by their race, colour, and nationality (including citizenship), ethnic or national origins.

Will this change to service/policy/budget have a **differential impact [positive or negative]** on people of a certain race?

Please provide evidence to explain why this group may be particularly affected

The Local Area Profile shows that 35.3% of Enfield's population are from a White British background.¹¹

In the NatCen report of Gambling Behaviours in Great Britain in 2015, it highlights that gambling participation varied by ethnic group. Two thirds of White or White British adults had gambled in the past 12 months (65%), compared with less than half of minority ethnic adults; 36% of Asian or Asian British respondents, 40% of Black or Black British respondents and 49% of adults in other minority ethnic groups.¹²

In the September 2021 Gambling Related Harms Evidence Review, it states that there is low confidence that race could be considered risk factors for gambling.¹³ This is because there were either limitations in the methodology of the research and studies reviewed or insufficient evidence.

It is therefore not anticipated that the proposed Statement of Principles will have a negative effect on the grounds of race.

¹¹ 2019-based in-house ethnicity estimates.

¹² <https://natcen.ac.uk/media/1464625/gambling-behaviour-in-great-britain-2015.pdf>

¹³ <https://www.gov.uk/government/publications/gambling-related-harms-evidence-review/gambling-related-harms-evidence-review-summary>

Mitigating actions to be taken

None required.

Religion and belief

Religion refers to a person's faith (e.g. Buddhism, Islam, Christianity, Judaism, Sikhism, Hinduism). Belief includes religious and philosophical beliefs including lack of belief (e.g. Atheism). Generally, a belief should affect your life choices or the way you live.

Will this change to service/policy/budget have a **differential impact [positive or negative]** on people who follow a religion or belief, including lack of belief?

Please provide evidence to explain why this group may be particularly affected.

In the September 2021 Gambling Related Harms Evidence Review, it states there is moderate confidence that religion is not one of the risk factors for harmful gambling among children and young people.¹⁴

It is not anticipated that the proposed Statement of Principles will have a negative effect on the grounds of religion and belief.

¹⁴ <https://www.gov.uk/government/publications/gambling-related-harms-evidence-review/gambling-related-harms-evidence-review-summary>

Mitigating actions to be taken

None required

Sex

Sex refers to whether you are a female or male.

Will this change to service/policy/budget have a **differential impact [positive or negative]** on females or males?

Please provide evidence to explain why this group may be particularly affected.

Men are more likely to gamble than women, and this difference is most obvious for online gambling where 15% of men participate, compared to 4% of women. People who are classified as at-risk and problem gamblers are more typically male. The September 2021 Gambling Related Harms Evidence Review, states there is a high degree of confidence that being male was deemed a risk factor for

subsequent harmful gambling among children and young people.¹⁵

In Enfield, 49% of the population are male.¹⁶

Operators shall have due regard of the Local Area Profile which will reduce the risk of vulnerable people developing gambling-related problems because through the completion of risk assessments, licensed premises will have an improved understanding and focus on local risks and mitigating gambling-related harm.

This will mean that premises will need to consider the implementation of strategies to mitigate this, for example, increasing staff levels and the requirement of staff training to help staff members spot and assist vulnerable men and women.

The revised Statement of Principles would have a neutral impact on the protected characteristic of sex (gender). The statement of principles seeks to protect both males and females from gambling related harm.

¹⁵ <https://www.gov.uk/government/publications/gambling-related-harms-evidence-review/gambling-related-harms-evidence-review-summary>

¹⁶ ONS mid-year estimates 2020

Mitigating actions to be taken

None required.

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Sexual Orientation

This refers to whether a person is sexually attracted to people of the same sex or a different sex to themselves. Please consider the impact on people who identify as heterosexual, bisexual, gay, lesbian, non-binary or asexual.

Will this change to service/policy/budget have a **differential impact [positive or negative]** on people with a particular sexual orientation?

Please provide evidence to explain why this group may be particularly affected.

It is unlikely that the revised Statement of Principles will lead to differential impact for people based on this protected characteristic because the policy has no particular impact on sexual orientation.

Mitigating actions to be taken

None required

Socio-economic deprivation

This refers to people who are disadvantaged due to socio-economic factors e.g. unemployment, low income, low academic qualifications or living in a deprived area, social housing or unstable housing.

Will this change to service/policy/budget have a **differential impact [positive or negative]** on people who are socio-economically disadvantaged?

Please provide evidence to explain why this group may be particularly affected.

Deprivation has a significant impact on health and wellbeing. Enfield is deemed to be the 9th most deprived borough in London, and 57th most deprived Local Authority in England (OMD IMD 2019). There is a clear divide between the east and west wards, and those in the east rank amongst the top 20-30% most deprived wards in England.¹⁷

¹⁷ <https://new.enfield.gov.uk/healthandwellbeing/topics/demography/>

At March 2021, Enfield's Claimant Count was 20,625. This represents the number of Enfield residents claiming unemployment benefits in the form of Job Seekers Allowance or Universal Credit (with a job-seeking conditionality regime). This represents a 67% increase in the number of unemployed adults in the year from March 2020 with the greatest rise occurring between March and May 2020, at the start of the global Covid-19 pandemic. The Claimant Count percentage rate (i.e. the number of unemployed claimants as a percentage of all residents aged 16-64) rose more than threefold from 3.6% to 9.7% in the same period, as is higher than the average rates for both London and England.¹⁸

The gambling related harms evidence review summary shows that the highest rates of gambling participation are among people who have higher academic qualifications, people who are employed, and among relatively less deprived groups. The socio-demographic profile of gamblers appears to change as gambling risk increases, with harmful gambling associated with people who are unemployed and among people living in more deprived areas. This suggests harmful gambling is related to health inequalities.¹⁹

The Local Area Profile sets out maps in Figures 7 to 9 of hotspots for areas of deprivation, unemployment and those claiming Universal Credit against locations of gambling premises.

The implementation of the updates to the Local Area Profile will have a positive impact on unemployed people or people suffering in deprivation.

The completion of the risk assessment based on the local area profile by each gambling premises operator will highlight the need for each premises to review their gambling operation, design and layout of the premises and control mechanisms to reduce the risk of people who are considered vulnerable due to being in an area of socio- economic deprivation, being subject to gambling-related harm. This could include training staff to a different level in order to spot and help vulnerable people, designing the premises so that staff don't have obstructed views of gaming machines or entrances and introducing extra CCTV cameras to monitor the activity of patrons, for example.

¹⁸ <https://new.enfield.gov.uk/services/your-council/borough-and-wards-profiles/borough-profile-2021-your-council.pdf>

¹⁹ <https://www.gov.uk/government/publications/gambling-related-harms-evidence-review/gambling-related-harms-evidence-review-summary>

Mitigating actions to be taken.

Measures are stated in the Statement of Principles that will help protect vulnerable people, which includes those disadvantaged due to socio-economic factors.

SECTION 4 – Monitoring and Review

How do you intend to monitor and review the effects of this proposal?

Who will be responsible for assessing the effects of this proposal?

Enfield has undertaken an eight-week statutory public consultation to obtain the views of local residents and businesses on the proposals made to the Statement of Principles. The responses have been taken into account for the final draft, for example, has removed places of worship from the Local Area Profile as there was no evidence to link this with gambling related harm. The feedback to the consultation will be published. The council keeps the policy statement under constant review. Any reviews that are submitted as a result of enforcement action is overseen by the Licensing Committee.

The EqlA has been prepared by Ellie Green, Principal Licensing Officer, and Sue McDaid, Head of Regulatory Services & Corporate Health and Safety. It has been prepared as part of the policy drafting process prior to approval of the Statement of Principles by Full Council.

The EQIA will be reviewed again in 3 years' time during the next review of the Statement of Principles, or sooner if required.



SECTION 5 – Action Plan for Mitigating Actions.

Identified Issue	Action Required	Lead officer	Timescale/By When	Costs	Review Date/Comments