Manchester City Council Report for Resolution

- **Report to:** Children and Young People Scrutiny Committee 5 September 2017 Executive – 13 September 2017
- Subject: Proposed closure of Buglawton Hall School
- **Report of:** Interim Director of Education

Summary

This report outlines a proposal to close Buglawton Hall Special School which is a residential special school for boys with Social, Emotional and Mental Health needs. The school is located near Congleton, Cheshire East.

Recommendations

- 1. That the Children and Young People Scrutiny comment on this proposal.
- 2. That the Executive approve the proposal to close Buglawton Hall Residential Special School with effect from 31 March 2018.

Wards Affected

The school is located in Cheshire East. Seven of the pupils who will be attending the school in September reside in wards within the City.

Manchester Strategy outcomes	Summary of the contribution to the strategy
A thriving and sustainable city: supporting a diverse and distinctive economy that creates jobs and opportunities	The increase in pupil numbers across the city requires additional primary, secondary, special school places and for resources to be deployed most efficiently and to match need. This involves capital investment in new buildings and in modifying existing buildings, which creates employment in construction and other associated building enterprises. Additional school places within the city require extra staffing which creates jobs and opportunities for residents.
A highly skilled city: world class and home grown talent sustaining the city's economic success	Ensuring a sufficient supply of school places across the continuum of provision ensures that children with wide ranging needs access appropriate education and can achieve their potential and contribute to the city's economic success.

A progressive and equitable city: making a positive contribution by unlocking the potential of our communities	Regular attendance at high quality schools helps all children and young people to develop appropriate social skills, self-respect and respect for others.
A liveable and low carbon city: a destination of choice to live, visit, work	Access to good and effective schools providing a high quality education is central to the Council's strategy of developing sustainable neighbourhoods, to make Manchester increasingly attractive to economically active people as a place to work, live and bring up children.
A connected city: world class infrastructure and connectivity to drive growth	

Full details are in the body of the report, along with any implications for:

- Equal Opportunities Policy
- Risk Management
- Legal Considerations

Financial Consequences – Revenue

In 2017/18 the Local Authority has a planned £65m High Needs budget from the Dedicated Schools Grant for education provision for children and young people with high levels of Special Educational Need and Disability (SEND). This now includes responsibility for young people with SEND up to the age of 25. The majority of this budget is allocated to special schools, colleges and specialist providers to make provision for children and young people with high levels of SEND.

The annual budget share for Buglawton Hall School is £1.6m and is based on 18 places. The budget has two main components, education place and residential provision funding. In September 2017, there will be12 pupils on roll at the school; 3 of these places are commissioned by other Local Authorities for day pupils at a cost of £20,000 per place. This makes the cost of a residential place at the school higher than comparable residential schools.

If the decision is made to close Buglawton Hall School, the revenue budget, following transition, would be released to support the High Needs block, which is under pressure and insufficient to meet the needs of Manchester children and young people with SEND.

Financial Consequences – Capital

Following capital investment of \pounds 6.6m through the Building Schools for the Future scheme approved in 2008, there is a small risk that the Department for Education may require a return of an appropriate proportion of this investment if the site is not used for Education purposes within a 10 year period. There will also be a holding

cost incurred between the point of closing the school and vacating the property and the disposal of the site.

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Background documents (available for public inspection): The following documents disclose important facts on which the report is based and have been relied upon in preparing the report. Copies of the background documents are available up to 4 years after the date of the meeting. If you would like a copy please contact one of the contact officers above.

- Report to Children and Young People's Scrutiny Committee and Executive Consultation on the Closure of Buglawton Hall School - February 2017
- Report to Executive Member Children's Services and Director of Education and Skills – Proposal to close Buglawton Hall School - 5th May 2017
- Publication of statutory notice and formal consultation on proposal to close Buglawton Hall School – 12th June 2017
- Update on Special Educational Needs and special school place planningReport to Schools Forum September 2016
- Report to Schools Forum on Dedicated Schools Grant December 2016

1.0 Introduction

- 1.1 Manchester Local Authority offers a wide range of specialist services and provision for children and young people with special educational needs or disability (SEND) within the City which includes inclusive mainstream schooling, mainstream schooling with support, resourced mainstream schools and a range of special school provision for children and young people with different types of need. As required by the Special Education Needs and Disability Code of Practice published in 2015, the range of specialist services to support children and young people with SEND and the numbers and type of specialist places provided in the City are continually under review, to ensure that there is a sufficient supply of places to meet demand and that all schools and services are able to deliver good outcomes for children and young people with SEND.
- 1.2 This report outlines a proposal to close Buglawton Hall Special School which is a residential special school for boys with Social, Emotional and Mental Health needs (SEMH).
- 1.3 The process required for the closure of a maintained school is set out in the DfE's statutory guidance 'Opening and Closing Maintained Schools', and has five stages. A decision maker must have regard to the guidance when carrying out duties relating to establishing a new school and/or the discontinuance of an existing school. The statutory process for closing a maintained school has 5 stages:
 - Stage 1 Consultation
 - Stage 2 Publication
 - Stage 3 Representation
 - Stage 4 Decision
 - Stage 5 Implementation
- 1.4 Stage 1 is described in the guidance as an informal and pre-consultation phase, in which views are gathered on the possibility of closure leading to, if the decision is made to proceed, a decision to publish a formal proposal including a statutory notice of proposed closure, stage 2 of the process. Stage 3 of the process is a period of formal consultation during which representations can be made regarding the formal proposal. Stage 4 follows, in which the decision is taken on whether to proceed with the proposal, followed by (if appropriate) stage 5, implementation of the proposal.
- 1.5 This report follows the Executive's decision in March 2017 to begin the process of consulting on the proposal to close the school (as set out in stage 1) and to delegate the decision to proceed to stages 2 and 3 to the Director of Education and Skills and the Executive Member for Children's Services. The decision to proceed with stages 2 and 3 was made by the then Director of Education and Skills and the Executive Member for Children's Services on 5th May 2017 following an initial stage of informal consultation.

- 1.6 This report sets out the reasons for the proposed closure and what alternatives to closure have been considered and discounted; the reasons why the Local Authority believe the proposals will lead to improvements in the quality and range of educational provision available for children in the City; the arrangements to be put in place if a closure was agreed; the outcomes from the informal (stage 1) and formal consultation (stage 3) process and will explain how any issues raised through the consultation process will be addressed.
- 1.7 An Equality Impact Assessment on the proposal has been completed and is included in appendix 2.

2.0 Background

- 2.1 Buglawton Hall School is a Local Authority residential special school for boys from Year 5 to Year 11. The pupils all have Statements/Education, Health and Care plans for their Social, Emotional, and Mental Health (SEMH) difficulties. It is located near Congleton, Macclesfield and offers residential care from Sunday evenings to Friday afternoons each week during term time (38 weeks per year) and has the capacity to accommodate around 20 residential pupils. The school is funded through the High Needs block of the Dedicated Schools Grant.
- 2.2 The budget share for Buglawton Hall School for 2016/17 is £1.6m. Significant savings have been made by the school since 2012/13 when the budget was £1.962m. However, the number of pupils in the provision has lowered significantly as demand for this provision has reduced.
- 2.3 The number of pupils on roll in September 2017 will be 12 which includes 7 residential pupils, 4 day pupils and 1 pupil educated off site. This number has fallen incrementally from a total of 34 pupils at the start of 2007/ 2008.

Current provision for children and young people with Social Emotional Mental Health needs (SEMH)

2.4 In January 2017 there were 2,686 children in Manchester schools with SEMH as a primary need. The majority of these children have their needs met with additional support put in place in school (SEN support). This cohort has increased each year since 2014 (based on school census).

Year	Numbers of children with SEMH as primary need
2014	1872
2015	2180
2016	2526
2017	2686

2.5 In June 2017 there were 2,754 children and young people of school age with a Statement or Education, Health and Care plan (EHCP) in Manchester. Of these, 523 (19%) had a primary need of Social, Emotional and Mental Health

needs (SEMH); 442 of the pupils were male and 81 female; 169 pupils were of primary age and 354 of secondary age.

- 2.6 Manchester currently offers a range of provision for children in the City with SEMH needs. This includes:
 - Mainstream schools
 - Mainstream school with additional support
 - Access to alternative provision made by the primary and secondary Pupil Referral Units (PRU) this includes specialist provision.
 - Access to alternative provision for young people with significant mental health needs based at Leo Kelly Centre commissioned from Manchester Hospital School
 - Resourced provision in 2 primary schools
 - Special day provision made by the Manchester Federation of Emotional, Behavioural and Social Difficulties (EBSD) Schools for children from Year 5 to Year 11 based across 4 sites
 - 38 week term time residential provision at Buglawton Hall School
- 2.7 All specialist schools and alternative provision including the PRUs and Hospital School are currently judged good or outstanding by Ofsted.
- 2.8 There were 38 children with SEMH who were placed in independent day provision in 2016/17 because of an overall shortage of day places Manchester special schools. The average cost of these places is £36,565 which is significantly more than the cost of a place in a Local Authority special school £19,762.
- 2.9 The demand for specialist day places is in contrast to a reduction in numbers of Manchester pupils with SEMH attending residential provision. There is a small but significant number of young people with complex needs requiring specialist 52 week residential provision because of high levels of mental health need often following access to tier 4 mental health provision. Currently, these children are placed in independent provision which is jointly funded by Education, Health and Social Care.

Financial Year	52 week (up to year 11)	38 week (up to year 11)
2013-14	31	(up to year 11) 4
2014-15	20	4
2015-16	16	2
2016-17	9	2
2017-18	6	1

3.0 Current provision at Buglawton Hall - Pupils

3.1 In June 2017, Buglawton Hall School had 15 pupils on roll ranging from Year 6 to Year 11. 10 of the pupils were resident at the school, Sunday evening to Friday afternoon, 4 were day pupils and one was being educated off site. Of

these, 3 pupils were placed on a day basis by another Local Authority and the fourth day pupil resides in Cheshire, but is placed by Manchester.

- 3.2 At the end of June 2017, 3 year 11 pupils left the school. All are returning to Manchester and have secured college places.
- 3.3 5 pupils had attended the school for over 4 years. 1 joined in 2015, 6 in 2016 and 3 in 2017.
- 3.4 Pupils' attendance is variable across the cohort and is as follows:
 8.22%, 12.5%, 14.94%, 51.05%, 57.58%, 60.26%, 74.47%, 78.29%, 84.71%, 85.53%, 86.58%, 91.05%, 99.14%, 99.29%, 99.43%.
- 3.5 The headteacher provided the following information on numbers of pupils on roll over the past ten years. This sets out numbers at the start and end of the year, taking account of in year admissions and leavers. From September 2017 the school will have 12 pupils including 4 day pupils.

Year	Start	Admissions	Leavers	End
2007 - 2008	34	17	20	31
2008 - 2009	31	4	7	28
2009 - 2010	28	7	18	17
2010 - 2011	17	10	6	21
2011 - 2012	21	9	7	23
2012 - 2013	23	5	9	19
2013 - 2014	19	0	5	14
2014 - 2015	14	2	6	10
2015 - 2016	10	2	5	7
2016 - 2017	7	8*	3	12*

*Including four day pupils

Staffing

3.6 Buglawton Hall School is governed by the Governing Body for the Federation of EBSD schools which includes 2 day schools based in the City across 4 centres as well as Buglawton Hall. There is an Executive headteacher who leads all of the schools across the Federation of schools. Buglawton Hall School is managed by a Head of Centre and has 47 staff which includes 22 care staff; 11 education staff; 14 administration and support staff.

Site

3.7 Buglawton Hall School was purchased by the Council in 1950 under the powers of the 1933 Local Government Act and the Education Acts 1944-48. Since acquisition it has been used as an educational establishment, and received substantial grant aid of £6.6m for the development of new and refurbished facilities under the Government's BSF programme in 2009 (approved in 2008). Buglawton Hall is located in a rural setting in parkland grounds of around 5 hectares, approximately one mile from the nearest

village. It has a number of buildings located on site, although not all are in use or fit for purpose.

3.8 It comprises a Grade 2 listed Georgian mansion house, with medieval core, with a range of listed outbuildings (some converted to provide teaching accommodation) and more modern residential blocks for students and staff. Within the extensive parkland grounds are four former staff houses, which are all vacant and disused (although they have been secured and in various states of repair).

Budget

- 3.9 There is considerable pressure on the High Needs block which has been reported to the Schools Forum (December 2016). The High Needs Block allocation increased by £1.8m in 2014/15, £0.97m in 2015/16, £1.6m in 2016/17 and £1.6m in 2017/18 in recognition of pupil growth. These increases do not fully meet the demands on additional special school places, increases in number of EHCP plans and additional duties around 19-25 year olds. Based on information from the Department for Education this summer it is anticipated that Manchester will receive an increase of between £0.4m- £1.6m for 2018/19, this will not fully cover the increased demand for SEND provision in the City. Since 2015/16 efficiencies have been identified within this budget through reviewing support services offered and this work will continue.
- 3.10 It is anticipated that the whole of the £1.6m High Needs Block funding currently used to fund the school would ultimately be released following a transition period to fund provision for pupils with SEMH.
- 3.11 The residential element of school's funding totals £1.2m and the £0.4m is funding for 'school' places, on average £20k per place. This does not include the travel costs of taking residential pupils to and from the provision which is £26,528 per annum. Offering day places in the school therefore does not offset the cost of the residential element in the school which accounts for the vast majority of spend on the budget.

4.0 Reasons for proposed closure

- 4.1 There are a number of reasons for the proposed closure of this school.
- 4.2 As outlined earlier in this report there has been reduced demand for specialist 38 week residential provision for a number of years now and this falling demand has meant that the school is no longer viable. The school has been funded for the last 2 years for 18 residential places at £87k per place and these have not been filled. This was agreed with the school as the minimum budget required for it to be able to operate safely. Based on numbers of pupils placed in the school on a residential basis by Manchester, the cost of a place in September because of under capacity is £190k per residential pupil. (The cost of a day place is £20k, so 4 day pupils account for £80k of the budget). This makes the cost of a place at the school significantly more than if these

places were commissioned from the independent sector at an average of £70k per place in a 38 week residential provision.

- 4.3 If the school was funded based on its actual number on roll in September (8 residential and 4 day) which is the way that all other special schools in the City are funded, based on a day place of £20k and a residential cost of £87k it would generate a budget of £503,476 which would mean it would not be financially viable.
- 4.4 There is increasing demand for specialist day provision in the City for children with special education needs including those with SEMH. This is resulting in children being placed in day provision in the independent sector because of insufficient day places in the City to meet this demand.
- 4.5 Manchester has been allocated £2.4 million of capital funding to invest in education provision for children with Special Educational Needs and Disabilities including, development of resourced provision in mainstream schools and/or expansions of special schools to create more places. There is currently considerable pressure on the High Needs block of the Dedicated Schools Grant, which is used to fund SEND provision. Consequently, the Local Authority needs to reprioritise spend from this High Needs block so that new special school places created using the capital funding can be revenue funded. The £1.6m funding currently allocated to Buglawton Hall would provide revenue funding to support these developments by creating increased numbers of day places in the City and developing a greater range of local educational provision including resourced mainstream provision and alternative provision that would have a positive impact on a wider number of children and young people with SEMH.
- 4.6 Since 2014, there has been considerable investment in the Early Help and Social Care offer in the City. This includes:
 - the development of 3 multi agency Early Hubs which provide a range of support for families,
 - the city wide roll out of the early years delivery model which has meant that families are accessing targeted services earlier,
 - increased numbers of social workers meaning that social work caseloads have reduced,
 - the development of a specialist disabled children social work team,
 - investment in approaches such as Signs of Safety,
 - commissioning of Multi Systemic Therapy,
 - the development of Alonzi House which provides intensive family support through an outreach and short breaks programme for young people aged 11 to 17 on the edge of care.
- 4.7 In addition, there has been national investment in Child and Adolescent Mental Health Services (CAMHS), which has meant that CAMHS in Manchester has a wide reaching transformation programme including commissioning of an integrated community response service which will have staff based in the Early Help hubs and specialist provision in the City as well as increased training and access to CAMHS for schools.

- 4.8 In Manchester, there is a formal partnership of Special School head teachers and the Local Authority has delegated £500k of High Needs funding to this partnership to support the education of children with the most complex needs attending a Manchester special school. This partnership approach has been successful in preventing any exclusion from special schools for the last 3 years and reducing the numbers of children whose needs cannot be met within the City's school system.
- 4.9 This investment in services for children and young people and their families across Education, CAMHS and Children's Services means that there is more support available within the City for children with SEMH and their families, while they are attending day provision to prevent the need for residential provision and also meet the needs of children accessing day provision.
- 4.10 In addition, some of the funding from the closure of Buglawton Hall will be used to enhance the day provision currently available in the City to ensure, for example, that children attending day provision are able to access an appropriate Youth Offer, bespoke to meet their individual needs, which could include mentoring and supported access to targeted or universal youth provision, different types of therapeutic provision while in school and increase the funding delegated to the Special School Partnership for children with the most complex needs.
- 4.11 There is also a small but significant number of young people requiring specialist 52 week residential therapeutic provision because of high levels of mental health need, often following access to tier 4 mental health provision. Currently, these children are placed in independent provision which is jointly funded by Education, Health and Social Care and decisions to place children in this type of provision are made at a multi-agency resource panel. Plans are in place to develop a pooled budget and an integrated commissioning team across the 3 services to co-ordinate and oversee these arrangements. Residential specialist provision will therefore still be available for those children where multi agency assessment shows that this is most appropriate to their needs. However, this will be jointly commissioned by Education, Health and Social Care. Buglawton Hall is not able to meet the needs of this cohort because it is not registered to provide 52 week provision (see paragraph 5.2).

5.0 Alternatives to closure which have been considered

5.1 A number of alternatives to closure have been considered and discounted. A report was commissioned from an independent consultant by the governing body in partnership with the Local Authority in April 2016 to look at different options including the potential for other local authorities to commission places and the option of leasing the site to an independent provider. The report stated that there would need to be considerable investment in the site and proactive marketing across the region for the school to compete with the independent sector to attract placements from other local authorities and that this option still presented a financial risk to Manchester. However, contact made with a neighbouring authority has resulted in this Local Authority using the school for

day placements. The author did explore whether there would be interest from the independent sector in leasing the site by soft testing with 2 independent providers but neither of these resulted in any follow up.

- 5.2 Another option explored is whether Buglawton Hall could be used for 52 week placements. However, residential special schools which accommodate any child for more than 295 days are required to register as a Children's Home with OFSTED and comply with legislation and standards set for Children's Homes rather than residential special schools. In particular the Children's Homes Regulations (2015) quality standard 6 ; Quality and Purpose of Care specifies that children's homes should in most cases be in a homely, domestic environment and maintain a domestic rather than an institutional impression. There would need to be considerable capital investment in the Buglawton Hall School and site for it to be able to meet this standard and therefore be used for 52 week placements. In recent years there has also been a strategic intention to move away from placing looked after children in placements outside of the city and therefore it would not be appropriate to make this significant investment.
- 5.3 There is increased demand for day provision in the City and another option is that Buglawton Hall is used for day places (which it currently provides for Cheshire East and Staffordshire pupils). There are a number of reasons why this should be discounted. Firstly, the school is located 30 miles from the City Centre and there would be a significant cost to transporting pupils to and from the school each day (approximately £20k per annum for single occupancy and £8k if, for example, 5 pupils could travel together which would further increase travel times). In addition, the pupils would also be spending over an hour at least, each way per day, travelling to and from school (depending where they lived in the City) which would not be appropriate.

6.0 Process for closure

- 6.1 The process for a school closure is set out in Department for Education Statutory Guidance: Opening and Closing Maintained Schools – April 2016. The initial stage 1 consultation phase is informal and how it is carried out is not prescribed in regulations and it is for the proposer (in the case the Local Authority) to determine the nature of the consultation and length - although a minimum of 6 weeks is recommended and a maximum of 12 months. The initial pre consultation period lasted 8 weeks from 9 March 2017 to 5 May 2017.
- 6.2 During this informal consultation period, the Local Authority consulted with parents/carers of children at Buglawton Hall, children and young people at the school, staff at the school and had continued discussion with school governors.
- 6.3 In line with statutory guidance, following this informal consultation period, a full proposal was developed. The decision to publish this proposal and move to stage 2 of the consultation process and issue a formal proposal and statutory notice was delegated to the Director of Education and Skills in consultation

with the Executive Member for Children's Services. The decision to move to this stage of the process was made on 5 May 2017.

- 6.4 Publication of the statutory notice and proposal to close Buglawton School was 20 June 2017 (attached as appendix 3). As required, this was published in the Manchester Evening News and the City Council website on 20 June 2017 and in the Congleton Chronicle on 22 June 2017.
- 6.5 The formal stage of consultation lasted from 20 June to 21 July 2017. The list of consultees who received a letter about the consultation is included at appendix 1. Consultees were asked to respond online, however parents/carers of pupils at Buglawton Hall School and Federation day schools were sent paper copies of the consultation questions in case they did not have access to a computer to reply online.
- 6.6 Meetings were held with staff and unions on 6 July 2017. Social workers and education caseworkers from Manchester, Cheshire East, Stoke and Staffordshire have had discussions with parents/carers and pupils during the formal and informal consultation stages.

7.0 Proposal & future arrangements

7.1 It is proposed that the school is formally closed with effect from 31 March 2018. Although if approved, the implementation would begin in the Autumn term 2017 with children transitioning to new schools where possible for January 2018 as well as work with staff regarding their options. The Local Authority will be the decision maker in this instance and a decision should be made within a period of 2 months of the end of the representation period (stage 3) failing which the Local Authority must, within a week of the end of the 2 month period, refer the matter to the Schools Adjudicator. It is proposed the Children and Young People Scrutiny comment on this proposal ahead of the Executive making a decision on the proposed closure of Buglawton Hall Residential Special School on 13 September 2017.

Arrangements for pupils

- 7.2 Three of the pupils were in Year 11 and left Buglawton in July 2017. Arrangements for their post 16 education and training are already in place.
- 7.3 Manchester is committed to ensuring that all of the pupils on roll receive personalised provision to meet their needs. All pupils have an EHCP and pupils and their parents/carers will have individual reviews of their plans which will look at their strengths and needs, their aspirations and future outcomes and the individualised provision required to meet them. Conversations have taken place with pupils and families or carers to understand their preferences should Buglawton Hall close. Some have already expressed a preference for day or residential provision. This work is ongoing.
- 7.4 Due to the small numbers in the cohort it is inappropriate to set out the detail of options for each individual pupil if the decision is made to close the school.

However, the options being considered are: Manchester pupils who wish to return to Manchester day provision will have a place available to them at one of the Federation day schools. Other specialist day provision in Greater Manchester, Cheshire and Staffordshire is being considered for some pupils. Pupils who require residential provision will be able to transfer to other residential provision depending on where their needs and outcomes can be met best.

7.5 Manchester is in discussion with the local authorities responsible for the day pupils and other specialist day provision is being consulted. To ensure a smooth transition to new provision, all pupils would be supported by an education caseworker who would work with staff at Buglawton Hall and social workers to co-ordinate the transition and multi-agency planning. Information, Advice and Support (IAS) staff will provide parents/carers and pupils with independent advice and support, if required, in making their preferences.

Travel

- 7.6 Currently pupils are transported to the school from Manchester on Sunday evening and return on Friday afternoons. Day pupils travel daily from Cheshire East and Staffordshire. As Manchester pupils currently at Buglawton Hall have a Statement or Education, Health and Care plan they are all eligible to be considered for home to school travel under the Council's Travel Support to Access Education policy.
- 7.7 If Buglawton Hall closes, pupils will be assessed for a travel solution to enable them to get to and from their new school. Possible solutions offered will be discussed with the child and family and include access to independent travel training programme, free travel pass, direct payment to families or transport. For all pupils who attend day provision in the City the aim will be for them to access independent travel training as appropriate to their individual needs.

Staff

- 7.8 Staff at Buglawton Hall will be sent all job vacancies across the schools within the Federation of schools and guaranteed an interview for any suitable alternative roles. They will be entitled to a reasonable amount of paid time off during working hours to look for alternative work, attend interviews etc. They will also be offered the opportunity to attend outplacement support sessions provided by the Federation during their notice periods. Outplacement support could provide employees with support in matters such as CV and application writing, job search information and interview preparation.
- 7.9 If a decision is made to close the school, the Local Authority will work with Trade Unions and staff to agree terms for redundancy and pension release for those staff over 55. Estimated costs of this are £535k based on a leaving date of 29 March 2018 for all staff.

Site

- 7.10 At this point in time the view of Corporate Property and Strategic Development is that the property should only be disposed of as a whole either for redevelopment/conversion or for ongoing educational use. The site is served by a private drainage system that runs through the grounds of the associated cottages to a tank at the southern end of the site, eventually discharging clean water into the ditch adjacent to the site. The drainage arrangements may well therefore make piecemeal disposal of un-required elements of the site very difficult due to the various agreements and protections that would need to be incorporated into the sale deeds, and indeed the individual residences may be deemed unsuitable for mortgage purposes as a direct result.
- 7.11 It is understood that there is a risk of a 10 year clawback on the funds provided under the BSF programme (£6.6m), and therefore it would be in the Council's best interests to secure ongoing educational use of the site at least until that clawback period expires. It is understood that this clawback period expires in 2019. A neighbouring authority has expressed interest in delivering ongoing educational activities from the site should Manchester City Council withdraw, and it could well be in the City Council's best interests to negotiate terms with that authority, at the very least up to the end of the clawback period and potentially beyond, thus negating the need to close-down and secure these remote and vulnerable buildings.
- 7.12 However, the overall site has been assessed as having a capital value in excess of £2m and therefore any disposal at less than market value would require the consent of the Secretary of State under the Local Government Acts, in the light of the requirement to obtain Best Value. This would be alongside consent required from the office of the Secretary of State for Education to dispose of education land should future use not be related to education.
- 7.13 It may be that should another authority wish to commit to long term use of the site for educational purposes - a transfer of the asset to them with an overage clause incorporated within the deeds, to provide an additional receipt to the City Council in the event that their use ceased, could be acceptable, as it is likely that the market value for educational purposes would be limited.
- 7.14 It is recommended that the Council seek independent advice in respect of any lease arrangements, and also there will be a need to understand the current condition of the asset and works and associated costs. However, there would be significant holding costs should the decision be taken to retain the property as a vacant asset until such time a decision on future use or disposal can be taken. This will have a revenue implication to the Council.
- 7.15 If a decision is made to close the school, a further report will be provided by December 2017 for a decision on the future of the site.

8.0 Consultation Outcomes

Reponses received to formal consultation 20th June to 21st July 2017:

- 8.1 36 responses were received to the online consultation (including 1 by post responding to the online questions). 21 from staff, 2 from pupils, 2 from parents/carers, 11 others (Manchester schools, a governor, a neighbour, members of the public and partner organisations).
- 8.2 In addition, responses to the consultation by letter and email were sent by:
 - Chair of Governors of Manchester Federation of EBSD Schools
 - Headteacher of Buglawton Hall School
 - Member of staff of Buglawton Hall School
 - Regional Officer from AMiE Union

Responses to informal consultation 9th March to 5th May 2017

- 8.3 This report also includes responses gathered during the informal consultation stage from:
 - Meetings with Buglawton Hall staff, 15 February and 28 March 2017
 - Meetings with Federation Governors and Federation Senior Leadership team
 - Discussions with pupils, parents and carers -
 - Letters and emails received from Buglawton Hall Staff and Manchester Clinical Commissioning Group.

All responses are available for viewing.

- 8.4 The main themes and issues that were raised through the consultations are:
 - Impact on current pupils
 - Impact on parents/carers
 - Impact on staff
 - The Early Help, health and care offer for pupils with SEMH in Manchester
 - Potential loss of resource for the City
 - The proposal and process
 - Potential costs of the proposal
 - Releasing funding to the High Needs block
 - Future of the site and buildings
- 8.5 Each of these themes will be considered and a response provided to the consultation feedback received.

Online questions

8.6 The questionnaire asked 4 questions.

- <u>Question1</u> Do you agree or disagree with the proposal to close Buglawton Hall School?
- <u>Question 2</u> Why do you agree or disagree?
- <u>Question 3</u> How does the proposal affect you?
- <u>Question 4</u> Give us any other comments
- 8.7 The response to question 1 was as follows:

Response	Staff	Pupils	Parents / carers	Others	Total
Strongly agree	0	0	0	5	5
Agree	1	0	1	3	5
Neither agree nor disagree	0	0	0	0	0
Disagree	1	0	0	1	2
Strongly disagree	19	2	1	2	24
Total	21	2	2	11	36

- 8.8 Overall, 28% of correspondents agreed with the proposals and 72% disagreed.
- 8.9 Responses to the remaining questions are considered in more detail below.

9.0 Consultation themes and response

- 9.1 The answers to these questions, the other responses gathered through both stages of the consultation and the responses from the Local Authority have been grouped under the following key themes:
 - Impact on current pupils
 - Impact on parents/carers
 - Impact on staff
 - The Early Help, health and Social Care offer for pupils with SEMH in Manchester
 - Potential loss of resource for the City
 - The proposal and process
 - Potential costs of the proposal
 - Releasing funding to the High Needs block
 - Future of site and buildings

Impact on current pupils – issues raised

9.2 Pupils who responded to the online consultation and spoke to Local Authority staff were generally very positive about the school. One who responded online said that the proposed closure made him feel angry and upset. Another said he likes staying at Buglawton Hall and hopes the school stays open. One said that the school had taught him right from wrong and that it would be a big mistake to close the school. Another said he wishes his keyworker could stay

with him forever. One pupil commented that the school provides a safe environment and pupils are less likely to get into trouble there. Several pupils said they enjoyed the small classes and being able to ask for help when they need it. They also spoke favourably of the positive relationships between staff and pupils. Many said they preferred Buglawton to previous schools they had attended. There were many examples given of the activities pupils engage in and the skills they are learning. Some pupils said that they would like Buglawton to be a day school, particularly for the older pupils.

- 9.3 The parents/carers who responded to the consultation and spoke to Local Authority staff also gave examples of how the school has provided consistency and stability and helped pupils gain educational and independence skills, improve their maturity and self-esteem and become less socially vulnerable. Some were concerned that moving to a different school would unsettle the pupils and that day provision would not work for their young person.
- 9.4 Staff responded that Buglawton Hall provides a calm, therapeutic environment for exceptionally vulnerable young people and that the rural setting is important. It provides distance from anti-social behaviour, gang culture and involvement with drugs. There was a concern about how to minimise disruption for pupils particularly for those about to go into Year 11. Staff gave examples of how the small environment and close collaboration between residential and education staff worked well. Staff members felt that some pupils will not cope with day provision and this could lead to permanent exclusion and greater possibility of the young people causing disruption or offending. Staff also asked how young people will be able to get to medical and other appointments if the school closes.
- 9.5 Another respondent commented that the proposal is causing distress to a young person they are working with and that the school is a positive aspect of the child's life.

Response

- 9.6 The Local Authority's proposal to close Buglawton Hall School is not related to the quality of education or care the pupils receive but the longer term viability of the provision. Caseworkers and social workers have been seeking pupils' views about what provision they would like if the school closes. Some want to stay in a residential provision, but others would prefer to live in Manchester and attend day provision. In some cases, the pupils' circumstances have changed since the start of the consultation period, and pupils will be moving to other provision.
- 9.7 All the pupils have Statements of SEN/Education, Health and Care plans, some of the pupils are looked after by Manchester or another authority, so any change to provision would be through a review of the pupil's EHCP. This will take account of the pupil's views and aspirations, their parent/carer's views, the pupil's strengths and needs and the provision required to meet their needs and achieve the outcomes outlined in their plan. Those pupils that continue to

require a small, residential provision in a more rural environment will be found one.

Impact on parents/carers - issues raised

- 9.8 One parent/carer said that the school had helped him raise his young person and always been there for him. Several parents/carers said that they did not know how they would cope if their young person was not able to attend a residential school, it would affect their ability to look after their other children and other people they care for, as well as affecting their ability to hold down a job.
- 9.9 Staff commented that being placed at Buglawton Hall avoids a pupil becoming looked after. They said that the school provides support for both the pupils and their parents/carers and improves relationships between them, whilst also keeping links with their home community. Staff felt that many parents were very distressed but were unable to have their voices heard.
- 9.10 Governors commented that Buglawton Hall staff bridge any physical gap between home and school by building in a high level of communication and support to families and children.
- 9.11 Other respondents were concerned about parent/carer distress and how families would cope without residential provision.

Response

- 9.12 Parents have provided their views through reviews and through discussions with caseworkers, Information, Advice and Support and social workers. Parent/carer views are an important part of the Education, Health and Care plan review process. The Local Authority has to take account of parent's preferred choice of school and where the parental preference and the child's needs are for a residential provision, this will be secured.
- 9.13 The proposal includes developing additional support for families of pupils who access day provision at Federation schools, through the existing Early Help, Social Care and CAMHS services available within the City (which have had significant investment) and through enhancing the day provision available within the City, including access to therapeutic support. Therapy resources released from the proposed closure of Buglawton Hall would be focused on day pupils.

Impact on staff - issues raised

- 9.14 Staff responding online and in meetings felt very demoralised and that due to their distance from Manchester, that the Council does not care about them.
- 9.15 Staff asked what support would be provided for their emotional wellbeing (face to face support as well as access to the Health Matters helpline) and to help them look for other jobs.

- 9.16 Staff asked about the proposed staged closure and how that would affect staffing whether there would be staged redundancies. There were also concerns that staff may leave early and this might affect care and safety of pupils.
- 9.17 Staff and unions asked about the redundancy policy, how any redundancy process would work, whether they are currently classed as at risk. Some staff asked whether their contract would change and whether travel expenses would be paid if they were to be redeployed to Manchester. Some staff feared they would be unable to find another job if made redundant. Others wanted to know the outcome of the proposal as quickly as possible so they could get another job.
- 9.18 Staff and unions challenged the statement in the proposal that some staff may find it difficult to relocate to Manchester and questioned whether any staff would be offered redeployment. They pointed out staff commitment, training and experience, that current turn-over is low and this skilled resource might be lost to Manchester if the staff are made redundant.

Response

- 9.19 The Local Authority and school Governors regret the affect the proposal to close the school has had on staff morale and accepts that providing additional support to pupils and parents anxious about the proposal is creating additional demands on them.
- 9.20 The Federation provides the Health Matters health and well-being helpline for staff .This offers a confidential counselling service, advice about building resilience and dealing with personal matters as well as advice on other matters. Following a telephone discussion, face to face counselling can be offered if clinically appropriate. In addition, staff can access the new Employee Assistance programme provided for all Manchester City Council staff.
- 9.21 Until the decision is made to close a school, staff are not classed as 'at risk'. The Governing body will share the school redundancy policy with staff, should redundancies be necessary. The redundancy process means that any posts in the Federation would be ring fenced for Buglawton Hall staff, before being advertised externally. It is accepted that some staff may wish to travel to Manchester for a new post.
- 9.22 Support with writing CVs, interview practice and other support with job seeking would be provided if the decision is made to close.
- 9.23 The safe staffing of the school is the responsibility of the Executive headteacher as is the decision about whether travel expenses would be paid for a period for staff relocating.

The Early Help, health and care offer for pupils with SEMH in Manchester - issues raised

- 9.24 Governors were concerned to know what the alternatives are to avoid the need for residential placements. They fear that if intensive family focussed support is not available in a timely manner, for pupils struggling in the Federation day schools, their needs will not be met.
- 9.25 Staff and unions questioned whether the proposal to provide Early Help and social work support to children in the Federation day schools would be successful in reducing the need for residential provision. Many stated that pupils would be at risk living back in Manchester and attending day schools, that being at Buglawton Hall keeps young people out of trouble.
- 9.26 There is a concern that mental health difficulties are increasing in young people and that a residential provision with access to therapies and based in a rural setting meets the needs of many young people.
- 9.27 Many of the pupils attending Buglawton Hall had previously experienced Early Help support and interventions such as Multi Systemic Therapy and only came to Buglawton Hall after these had not worked. Staff were sceptical about whether the new offer of Early Help and Social Care, including Alonzi House, would prevent future pupils needing residential provision. Others were concerned that pupils would not be able to access services they need, such as CAMHS, if they returned to Manchester.
- 9.28 Staff feel they are currently providing care and health support to families ensuring pupils take their medication, taking them to medical and other appointments, helping families understand how to manage their young person's behaviour. Some staff felt that closing the school might affect other services such as the police.

Response

- 9.29 Some of the funding made available as a result of the closure would be used to improve the Short Breaks offer for young people in the City with SEMH this will include some targeted provision, support to pupils to help them access universal provision and training for universal providers on how best to meet the needs of young people with SEMH. In addition, the therapeutic support currently available to pupils based at Buglawton Hall is commissioned by the governing body of the Federation of Schools and would still be available to pupils who continue to access provision made by the Federation and discussions are being held with the Executive headteacher on how this offer could be enhanced.
- 9.30 The transformation of mental health support for young people in Manchester also includes the commissioning of a new Integrated Community Response Team which will work in the Early Help hubs and schools to deescalate some of the issues experienced by young people with Social, Emotional and Mental Health needs and link them to the right services.

9.31 There has been a significant investment in a range of other services in the City including Early Help and Social Care which work with children and their families. There is also a strong evidence base for Multi Systemic Therapy.

Potential loss of resource for the City - issues raised

- 9.32 Many of the respondents commented that Buglawton Hall is a fantastic provision that is not being used to its full potential. Ofsted has judged both education and care as good. Staff commented that closing Buglawton Hall would damage the continuum of provision for pupils with SEMH and that it would be difficult to replicate elsewhere the things that Buglawton Hall provides.
- 9.33 Staff and union representatives asked why it was not possible to offer 52 week provision, respite care, parenting courses at Buglawton Hall or why the school could not take female pupils. Staff felt that social workers and other professionals were unaware of Buglawton Hall and therefore did not recommend it. Some asked if it was possible to keep Buglawton Hall open as a day school. At the staff meetings and online, there were many comments about whether the Local Authority had engineered the reduction in pupils or was deliberately blocking pupils being referred to the school, that Educational Psychologists were being told they could not recommend 38 week provision and that the Local Authority should promote the provision to other local authorities.
- 9.34 Many staff questioned the statement in the proposal that there is a reduced demand for residential provision for pupils with SEMH. Staff also felt that there are pupils currently in Federation day schools who need the type of provision that Buglawton Hall provides.
- 9.35 Staff asked why the Local Authority has placed pupils in residential provision other than Buglawton Hall.

Response

- 9.36 Manchester currently has 523 pupils with an Education, Health and Care plan for their primary need of SEMH. The proposal is to use the budget currently spent on the pupils at Buglawton Hall for the benefit of a much greater number of children, whilst also ensuring that the current Buglawton Hall pupils receive the provision they need.
- 9.37 The accommodation at Buglawton Hall does not meet Children's Homes Quality Standards and it would require significant investment to bring them up to that standard. The Local Authority aims to support children to stay with their family or to find them a foster placement rather than placing them in residential school.
- 9.38 Few local authorities have a maintained residential school for pupils with SEMH. In the North West, a website review of residential provision showed that the vast majority were run by independent providers with very few

maintained residential special schools. The Local Authority will still purchase 38 or 52 week residential provision for pupils who require it and in the future this will be done through an integrated joint commissioning team across Health, Education and Social Care. The increased demand in Manchester is for specialist and resourced provision day places.

- 9.39 There are a number of reasons why pupils have been placed in other types of residential provision including that 2 are female, 2 pupils have EHC plans maintained by other local authorities and some young people in residential provision are in year 12.
- 9.40 There is no reason why the school could not take girls. However, for girls to be placed at a residential school, there would need to be a group of girls placed there as it would be inappropriate to have just one or two because of a lack of peer group. The proportion of girls with an EHCP for SEMH is significantly lower than the proportion of boys and there has not been demand for girls in this cohort for 38 week residential provision.
- 9.41 The Local Authority refutes all claims that there has been a deliberate policy of not placing children at Buglawton Hall, apart from the period when the school was placed in special measures by OFSTED (from 2013 to 2014) when new admissions to the school were stopped. The Local Authority has a duty to ensure all pupils are placed in the type of provision that meets their assessed needs as set out in their EHCP. Decisions on placements are made transparently through a panel attended by impartial, independent professionals, such as educational psychologists, social workers and teachers, taking into account parental preference. Local Authority decisions can be challenged through the Special Educational Needs Tribunal. There have been no challenges made through this process where the Local Authority has refused to place a child at Buglawton Hall. Furthermore, the school has been funded for 18 residential placements - it therefore does not make sense to consider that the Local Authority would not place children at the school if this was appropriate for their need as the places are already funded.

The proposal and process - Issues raised

- 9.42 Staff, governors and unions challenged the accuracy of some of the data used in the proposal: the capacity of the school to accommodate 35-40 pupils, the number of children currently on roll, the potential decrease in daily car travel for pupils who return to Manchester day schools, the statement that pupils will be offered independent travel training, that most pupils go home once a week. The staff also challenged how the report represented the views of pupils and parents and said that one pupil had retracted his statement about wanting 'a school he could walk to'.
- 9.43 Staff and unions have questioned the validity of the process. They feel that the information regarding the potential options for pupils was insufficient, that the proposal should have included full costings of the alternative provision for pupils, more information about improvements for pupils, the costs of staff redundancies, details of the future of the site and buildings, any costs relating

to closure and income from potential sale and a more detailed timeline for closure.

- 9.44 Staff and unions felt that the reduction in admissions was due to a block being put on admissions, rather than reduced demand. Staff also questioned the date on the proposal and why it was not published on 16th June as had originally been stated.
- 9.45 Staff and unions stated that they felt a decision to close had already been made, that social workers and staff from other authorities had been saying in meetings that the school was closing and gave this as a reason for not referring pupils. Staff felt that the report to Executive would not be impartial.
- 9.46 Unions questioned why they had not been invited to the staff meetings during the informal consultation stage and both staff and unions asked why the formal consultation meeting with them was not held until 6th July.
- 9.47 Staff and unions felt that the Local Authority should complete its strategic review of educational provision before proposing to close Buglawton Hall.

Response

- 9.48 Corrections to data the proposal should have stated that the school originally had capacity for 35 to 40 residential pupils, but currently has capacity for 20 residential and is being funded for 18 residential pupils. The number of children on roll when the proposal was being prepared was 14. A new day pupil was admitted 5 days before the report was completed.
- 9.49 Car travel it is accepted that Buglawton Hall provides independent travel training for pupils, but any pupils that have not been fully travel trained will be offered this if they return to Manchester. Most pupils do not go home once a week, pupils (particularly older ones) are offered supported home visits to further develop family and community links.
- 9.50 The statutory process the proposal was originally planned to be published on 16 June 2017, but it was not possible to publish until 20 June. The statutory notice in the Manchester Evening News had to correlate with the date of posting on the City Council website and letters/proposal being sent to Governors and staff. However, the process lasted more than the 4 weeks required by regulations.
- 9.51 The proposal did not give more details of options for pupils because numbers are so small that individuals could be identified. As stated in the proposal all pupils who require residential provision will receive it.
- 9.52 The Local Authority regrets that social workers and other local authorities were stating in meetings that the school would be closing and asked senior officers to emphasise to staff that no decision had been made and that the school was still able to admit pupils.

9.53 It is not a requirement of the statutory process to involve unions in the informal consultation stage. Unions were informed that the informal consultation was taking place.

Potential costs of the proposal - issues raised

9.54 Staff commented that there should have been detailed costings in the proposal, including the potential cost of other provision for the pupils and whether that would be greater than the cost of Buglawton Hall. There were also questions about which budgets would be used to fund independent provision (education and/or Social Care) and why Social Care do not currently contribute to the costs of Buglawton Hall. Staff asked how the Local Authority would be assured about the quality of independent provision that pupils might be placed in.

Response

- 9.55 It is not possible to provide costings of alternative provision for individual pupils. Consulting other potential providers at this stage for pupils who may need an alternative residential placement would have pre-empted the Executive decision about closure. If a pupil is placed in a residential school as a result of a joint assessment by education, Social Care or health, other agencies will contribute to funding.
- 9.56 All independent provision is subject to Ofsted inspection. Education case workers and social workers also play a role in quality assuring the provision on behalf of the Local Authority.

Releasing funding to the High Needs block - issues raised

- 9.57 Staff from Manchester schools commented that the pressure on special school places in the City is having an impact on other provisions and that funding could be released from Buglawton Hall for the benefit of a greater number of children in Manchester schools. One person commented that money is better spent on day schools of which there are too few.
- 9.58 Other respondents felt it makes sense for provision to be based in Manchester, that the proposed closure was regrettable but necessary, that providing better provision in Manchester for pupils with SEMH was a more effective use of public money and that due to the reduction in numbers of pupils, funding should be redirected elsewhere.
- 9.59 A neighbour of the school commented that the current provision is a very expensive way of educating a small number of children. Another respondent said that often children do not attend Buglawton Hall when they are on roll.
- 9.60 Governors responded that they understand the pressure on the High Needs block and that the current unit cost of a place at Buglawton Hall is not sustainable at the current level of occupancy. They also expressed concern that shared services across the Federation may not be sustainable without the

contribution of the Buglawton Hall budget. Federation staff commented that additional accommodation would need to be provided in the day schools if Buglawton pupils were brought back to Manchester.

9.61 Staff and unions commented that any revenue released should be used to provide residential places for current and future pupils who need it.

Response

- 9.62 The proposal is to use funding more cost effectively by developing additional day provision in Manchester. Currently there is a pressure on specialist day provision and the Local Authority is having to buy day places in independent schools which is more expensive than the cost of a place in a Manchester day special school.
- 9.63 £2.4m capital funding allocated to Manchester from the Department for Education, can be used to provide access to different types of day provision, including expansion of day schools, resourced provision and alternative provision. Revenue released from Buglawton Hall would be used to fund these additional places.

Future of the site and buildings - issues raised

- 9.64 Staff, unions and governors commented that there was insufficient information in the proposal about the future of the site and buildings. Many asked what will happen to the site and buildings if the school closes. There were several questions about the cost of mothballing the site. Staff asked why information from previous feasibility studies had not been communicated to them.
- 9.65 Several respondents asked about the houses on the site and why they could not be refurbished to provide 52 week provision or short breaks. Others asked about potential for income generation.

Response

- 9.66 A senior member of staff from Social Care visited Buglawton in 2016 to look at potential uses for the site and the view was that development of this site was not in line with the overall strategy in the city which was to reduce the number of in house children's homes and not place children out of the city where possible.
- 9.67 Furthermore, it would require significant investment to bring the houses on the site up to the standard required to meet Children's Home Quality Standards especially as they have not been occupied for a significant period of time.
- 10.0 How proposals are likely to lead to improvements in standard, quality and or range of educational provision for children with SEMH.

- 10.1 The proposal to close Buglawton Hall School will lead to overall improvements in the quality and range of educational provision for children in the City with SEMH because it will:
 - Support the investment of £2.4 million capital funding allocated to the Council to improve SEN provision by releasing revenue funding for a greater range of specialist places for pupils with SEMH including resourced provision in mainstream schools; commissioning new types of alternative provision and additional specialist day provision;
 - Reduce the number of children with SEMH being placed in independent specialist day places because the Local Authority cannot provide day places;
 - Enable the development of a coordinated and enhanced offer to all children attending day provision in the City which will ensure children and families receive access to appropriate intervention and support when required;
 - 38 week residential provisions will continue to be available for those pupils who require it following an assessment of their needs but this will be commissioned from the independent sector on a place by place basis which will be a more effective use of High Needs funding;
 - Maximise the use of the High Needs budget to meet the needs of a greater range of pupils with SEMH needs, both boys and girls, in the City.

11.0 Key Policies and Considerations

a) Equal Opportunities

- 11.1 An Equality Impact Assessment has been completed (appendix 2). The Public Sector Equality Duty has been taken account of.
- 11.2 As all the pupils attending Buglawton Hall School have a Statement of Special Educational Needs/Education, Health and Care plan, their individual views, aspirations, strengths and needs and the views of their parents/carers are the major considerations in planning future placements. Individual plans will also take account of any support needs relating to the pupil's age, race, gender, sexuality, religion or belief.
- 11.3 Closure of Buglawton Hall would release High Needs funding which would be accessed by both girls and boys with SEMH needs across the full age range.

b) Risk Management

- 11.4 There is currently a risk that Manchester's High Needs funding will not be sufficient to meet statutory duties for children and young people in the City with special educational needs up to age 25 (reported to Schools Forum in September 2016) unless current spend from this funding is reprioritised.
- 11.5 There is a small risk that the Department for Education could claw back funds provided through the Building Schools for the Future programme if the Buglawton Hall site is used for non-educational purposes before the claw back period expires in 2019. It is unclear how much of the investment if any would be clawed back.

11.6 If a decision is made to dispose of the site, permission may not be granted from the Secretary of State for Education. Closure of the site will incur security costs which may be significant and cannot be charged to the school's budget.

c) Legal Considerations

- 11.7 The Local Authority's duty to meet the needs and improve the outcomes of children and young people with special educational needs and disabilities are set out in the Children and Families Act 2014.
- 11.8 In reaching a decision the decision maker should additionally have regard to "Guidance for decision makers - Statutory guidance for decision-makers deciding prescribed alteration and establishment and discontinuance proposals." ('Decision-Makers Guidance')
- 11.9 A decision maker should act in accordance with the Decision-Makers Guidance a decision maker should:
 - Give reasons for the decision (whether rejected or approved)
 - Arrange for the decision and the reasons behind it to be published (within one week of making a decision) on the website where the original proposal was published.
 - Arrange for certain prescribed organisations (detailed in the Decision-Makers Guidance) to be notified of the decision and reasons.
 - Be satisfied that the appropriate fair and open local consultation and/or representation period has been carried out and that the proposer has given full consideration to all the responses received (as a failure to meet the statutory requirements may deem a proposal invalid).
 - Consider all the views submitted, including all those that support and object the proposal and comments on the proposal.
 - Consider the quality and diversity of schools in the area and whether the proposal will meet or affect the needs of parents; raise local standards and narrow attainment gaps.
 - Consider whether there are any sex, race or disability discrimination issues that arise from the changes being proposed in accordance with the Public Sector Equality Duty.
 - Consider the impact on community cohesion.
 - Be satisfied that travel and accessibility planning has been properly taken into account and the proposed closure does not adversely impact on disadvantaged groups.
 - Be satisfied that there is sufficient capacity to accommodate displaced pupils in the area, taking into account the overall quality of provision, the likely supply and future demand for places (to include consideration of the popularity with parents of the schools in which spare capacity exists and evidence of parents' aspirations for those schools).

12.0 Recommendation

12.1 It is recommended that the Children and Young People Scrutiny comment on this proposal by 5 September 2017 and that the Executive approve the proposal to close Buglawton Hall Residential Special School with effect from 31 March 2018.

Appendix 1

List of consultees

Parents/carers and pupils of Buglawton Hall School Manchester Federation Governors and staff **Buglawton Hall School staff** Parents/carers of Manchester Federation pupils Secretary of State for Education Members of Parliament for constituencies in Manchester, Cheshire East, Stoke and Staffordshire Manchester City Council Executive Members Directors of Children's Services and SEND Leads of Cheshire East, Staffordshire and Stoke Congleton Town Council Manchester schools **Trade Unions** Church of England Diocese Roman Catholic Diocese **Greater Manchester Police** Manchester Health and Care Commissioning Manchester CAMHS **Central Manchester Foundation Trust** Neighbours of the school Local suppliers to the school

The statutory notice was published in the Manchester Evening News and Congleton Chronicle

Appendix 2

Stage 2 Equality Analysis: Equality Impact Assessment

Demonstrating Outcomes of Equality Analysis

EQUALITY IMPACT ASSESSMENT

1. Directorate	Children and Families	2. Section	Education	3. Name of the	Proposed closure of
				function being	Buglawton Hall School
				assessed	

4. Is this a	Existing	5. Officer	Julie Hicklin	6. Lead	Isobel Booler
new or		responsible for		manager	
existing		the assessment		responsible for	
function?				the assessment	

7. Date	February 2017	8. Date of	August 2017	9. Date passed	August 2017
assessment		completion		to BIP Equality	
commenced				Team	

Summary of Relevance Assessment

1.	Has a Stage 1 Equality Analysis: Relevance Assessment document been completed?
	Yes x Date of assessment:
	No Please refer to 2.2 in the guidance above.
2.	Please indicate which protected characteristics the relevance assessment identified as relevant to the function that is being assessed (tick below):
	Age x 🗌 Disability x 🗌 Race x 🗌 Gender (inc. Gender Reassignment, Pregnancy and Maternity) x 🗌
	Sexual Orientation 🗌 Religion or Belief (or lack of religion or belief) 🔲 Marriage or Civil Partnership 🗌

3.	Please indicate which aims of the equality duty the relevance assessment identified as relevant to the function being assessed (tick below):
	Eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Act
	Advance equality of opportunity between those who share a protected characteristic and those who do not x
	Foster good relations between people who share a protected characteristic and those who do not x

Equality Impact Assessment Template

1. About your function

Briefly describe the key	Buglawton Hall School is a maintained residential special school in Congleton. The local authority is
delivery objectives of the	currently consulting on closing the school. This EIA will accompany the report to Children and
function being assessed	Young People's Scrutiny Committee and Executive in September 2017.
What are the desired	The school provides 38 week residential education for pupils with social, emotional and mental
outcomes from this function?	health needs (SEMH). All the pupils have a Statement of SEN or Education, Health and Care plan
	(EHCP), so the school is required to deliver the provision detailed in the Statement/EHCP. The
	school is part of the Manchester Federation of EBSD Schools. In July 2017 there were 12 pupils on
	roll at Buglawton Hall School, Manchester has responsibility for 8 of these pupils.

2. About your customer

Do you currently monitor the function by the following protected characteristics?	Protected Characteristics	Y/N	If no, please explain why this is the case and / or note how you will prioritise gathering this equality data
	Race	Y	
	Gender (inc. gender	Υ	
	reassignment, pregnancy		
	and maternity)		
	Disability	Υ	
	Sexuality	N	This characteristic is not routinely monitored by the local authority, though staff would take account of any pupil's support needs that relate to their sexuality.
	Age	Υ	
	Religion or belief (or lack of religion or belief)	N	This characteristic is not routinely monitored by the local authority, though staff would take account of any individual pupil's support needs that relate to their religion/belief.

	Marriage or civil partnership	N	This characteristic is not relevant due to the age of the pupils. The marital/civil partnership status of the pupils' parents/carers is not routinely monitored.		
4. What information has been	School census				
analysed to inform the content of	Department for Education sta	tistics			
this EIA?	Children and Young People Joint Strategic Needs Assessment				
Please include details of any data compiled by the service, any research that has been undertaken, any engagement that was carried out etc.	The proposal has been subject to public consultation with governors, staff, parents/carers, pupils, schools, health, care and other agencies, other local authorities, members of the public, trade unions, councillors and members of parliament and the responses to the consultation will form part of a report being taken to Children and Young People's Scrutiny Committee and Executive in September 2017.				

3. Delivery of a customer focused function

Does your analysis indicate a	Y N				
disproportionate impact relating to race ?	X				
Please describe the nature of any	Due to the small number of pupils attending Buglawton Hall School, it is not possible to give				
disproportionate impact/s	ethnicity data for the school in this report. According to 2017 school census data, the				
	percentage of pupils with a white ethnicity who attend the Manchester Federation Schools is				
Please indicate what actions will be	69% which is higher than the percentage of pupils with Social, Emotional and Mental Health				
taken to address these	needs (SEMH) who attend all Manchester schools 55%. Numbers of pupils at the Federation with a black ethnicity (13%) and mixed background (15%) are also higher than those of all pupils in Manchester with SEMH (9% and 11%). However, as these numbers are relatively small it is not possible to make reliable assumptions from this data.				
	All the pupils at Buglawton Hall School and the other Federation Schools have Statements/Education, Health and Care plans and receive individualised support according to the needs detailed in their plans, so any need relating to their ethnicity would be taken account of within their plan.				

Which action plans have these actions been transferred to?	
Does your analysis indicate a disproportionate impact relating to disability ? Please describe the nature of any disproportionate impact/s	Y N X Image: Comparison of pupils in Manchester who are at SEN Support level or have a Statement/ Education, Health and Care plan (EHCP) have a primary need of social, emotional and mental health
Please indicate what actions will be taken to address these	needs (SEMH). In summer term 2017 there were 2754 children and young people of school age with a Statement or EHCP in Manchester (the highest level of need). Of these, 523 (19%) had a primary need of social, emotional and mental health needs (SEMH). All of the 12 pupils at Buglawton Hall School have a Statement of SEN or Education, Health
	and Care plan (EHCP) for social, emotional and mental health needs (SEMH). The proposed closure of Buglawton Hall School will have a disproportionate impact on a number of pupils who have a Special Educational Need or Disability (SEND) as the school is a special school for children with SEND. For these pupils and their parents/carers, the proposed changes are likely to be unsettling. However, all pupils will have their Education, Health and Care plan reviewed. This will take account of their aspirations, views and preferences, their parent/carers views and preferences, the pupil's strengths and needs and the new provision that will be arranged for them, if Buglawton Hall closes.
Which action plans have these actions been transferred to?	If Buglawton closes, the intention is to reinvest some of the money in provision/support for pupils with SEMH in Manchester schools, so some of the other young people in Manchester with SEMH should see a positive impact.

Υ	N					
Х						
Of the	Manchester pupils with a Statement/EHCP (19%) with a	primary need of social,				
If Bugla	n Hall closes there will be a disproportionate impact relat	ing to gender as all the				
•						
The local authority maintains individual Education, Health and Care plans for pupils who						
have a high level of special educational needs and this would take account of any individual						
pupil's needs relating to their gender.						
Υ	N					
Χ						
The pu	social, emotional and mental health (SEMH) needs are the	he primary factor that				
dictates the type of provision they receive. The proposal is relevant in relation to the pupils'						
ages but does not impact because of their age.						
(All the pupils are aged between 11 and 15.) Numbers of pupils with the highest level of						
SEMH need are greater at secondary age (354) - than primary (169).						
Howev	the decision to close is made, all the pupils will have the	ir EHCP reviewed to				
ensure	re is no disproportionate impact for individuals.					
	X Of the 523 emotional a 84.5% male If Buglawto pupils at Bu provision in The local a have a high pupil's need X The pupils' dictates the ages but do (All the pup SEMH need However, if	X Image: Constraint of the second				

Which action plans have these actions been transferred to?			
Does your analysis indicate a disproportionate impact relating to sexual orientation ?	Y	N X	
Please describe the nature of any disproportionate impact/s Please indicate what actions will be taken to address these	local au pupils s	uthority a	re would be a disproportionate impact relating to sexual orientation. The nd the schools it maintains provide individualised support to pupils to all their take account of any pupil's individual support needs if they identified as bisexual.
Which action plans have these actions been transferred to?			
Does your analysis indicate a disproportionate impact relating to religion and belief (including lack of religion or belief)?	Y	N X	
Please describe the nature of any disproportionate impact/s		•	al, emotional and mental health needs are the primary factor in the type and they receive.
Please indicate what actions will be taken to address these	The loc	cal author	re would be any disproportionate impact relating to a pupil's religion or belief. rity and the schools it maintains provide an individual service to all the pupils would take account of any pupil's support needs relating to their religion or
Which action plans have these actions been transferred to?			

Does your analysis indicate the	Y	N	
potential to <i>cause discrimination</i> in relation to marriage and civil partnership ?		X	
Please describe the nature of any disproportionate impact/s	The ag partner		oupils means there would be no discrimination relating to marriage or civil
Please indicate what actions will be taken to address these			
Which action plans have these actions been transferred to?			
Does your analysis indicate a	Y	N	
disproportionate impact relating to carers?	X		
Please describe the nature of any disproportionate impact/s	howev	er, every	may see a negative impact if their child is required to change school, family is being consulted on the options they would prefer if the school il that requires residential provision and where that is their parent/carers'
Please indicate what actions will be taken to address these	prefere	ence, will	be provided with another residential school place. cent years, there have been improvements in many of the services that
	suppor	t children	, young people and their families in Manchester, including an Information, port service, Early Help Hubs, additional social workers, a children with
	disabili	ties socia	al work team, transformation of mental health services.
			t there is a more co-ordinated multi agency approach to supporting parents nildren with special educational needs and disabilities.
Which action plans have these actions been transferred to?			

4. EIA Action Plan

Service / Directorate lead: Isobel Booler Strategic Director: Amanda Corcoran Business Improvement and Partnerships – Equality Team lead: Kieran Barnes/Ryan Lamey-McArthur

Actions identified from EIA	Target completion date	Responsible Officer	Is this action identified in your Directorate Business Plan and / or Equality Action Plan? (Yes / No / n/a)	Comments
Ensure the needs of all Buglawton Hall School pupils related to their disability/SEN, age, race, gender, sexuality, religion and belief and identified and taken into account when their EHCPs are reviewed and any future provision considered.	January 2018	Julie Hicklin	Yes	

5. Director level sign off

Name:	Amanda Corcoran	Date:	22 nd August 2017
Directorate:	Education	Signature:	

NB: Sign-off must be in the form of an actual signature; not an emailed authorisation.

Manchester City Council

Publication of statutory notice and proposal to close Buglawton Hall Special School

Introduction

On 8th March 2017, Manchester City Council's Executive approved a proposal to begin a Stage 1 informal consultation on the closure of Buglawton Hall Residential Special School, based in Congleton, Cheshire. Delegated authority was given to the Director of Education and Skills and Executive member for Children's Services to receive a report on the Stage 1 consultation and make the decision whether to proceed to Stage 2.

On 5th May 2017, the Director of Education and Skills and Executive Member for Children's Services made the decision to publish the statutory notice for the closure of Buglawton Hall School and begin the Stage 2 consultation process.

This report outlines the outcomes of the Stage 1 consultation process and the proposal for closure of Buglawton Hall School.

Background

Buglawton Hall School is a local authority residential special school for boys from Year 5 to Year 11. The pupils have Statements/Education Health and Care plans for their Social, Emotional and Mental Health (SEMH) difficulties. The school is located in Congleton, Cheshire and offers residential care from Sunday evenings to Friday afternoons each week during term time (38 weeks per year) and has the capacity to accommodate around 35-40 pupils. Numbers in the school have fallen gradually since 2008 when the school had 41 pupils. There are currently 11 Manchester pupils on roll and 3 pupils from other local authorities attending as day pupils. In 2005, Buglawton Hall School joined two specialist day schools in a formal Federation of SEBD schools.

The school is funded from the Dedicated Schools Grant and the budget share for 2016/17 is £ 1.6m. Significant savings have been made by the school since 2012/13 when the budget was £1.962m. However, the number of pupils in the provision has lowered significantly as demand for this provision has reduced. There is much greater demand for specialist SEMH day placements within the city as the majority of young people want to be close to their links with the City of Manchester rather than a rural part of Cheshire. Day provision for pupils with SEMH within the City is already at capacity and over-subscribed at Key Stage 4.

Manchester currently offers a range of educational provision for children in the city with social, emotional and mental health needs. This includes:

- mainstream schools
- mainstream school with additional support
- access to alternative provision made by the primary and secondary Pupil Referral Units this includes specialist provision
- Access to alternative provision for young people with significant mental health needs based at Leo Kelly Centre commissioned from Manchester Hospital School
- Resourced provision in 2 mainstream primary schools
- Special day provision made by Federation of SEMH school for children from Year 5 to Year 11 based across 4 sites
- 38 week term time residential provision at Buglawton Hall School.

All specialist and alternative provision including the PRUs and Hospital School is currently good or outstanding. In addition, a number of children with SEMH are currently placed in independent schools out of the city in both day and residential schools.

Reasons for proposed closure

In 2016/17, £13,582,746 of high needs funding was allocated to meeting the special educational needs of Manchester children and young people with SEMH.

There is considerable pressure on the high needs block which has been reported to the Schools Forum (December 2016) despite an increase of £1.6 m in 2017/18. This is because of increased need for Education, Health and Care plans and specialist provision.

Manchester is currently developing a strategic plan for special provision, including a review of provision in the City for children with social emotional and mental health needs. Manchester has been allocated £2.4 million of capital funding to invest in the outcomes of the review and this can include provision of training for schools, development of resourced provision in mainstream schools or expansions of special schools to create more places. This review therefore provides an opportunity for looking across the whole continuum of provision for children with SEMH and identifying where capital investment is required at each point to support increased inclusion and better outcomes for this cohort of children. The £1.6m funding currently allocated to Buglawton Hall would provide revenue funding to support these developments by creating increased numbers of day places in the City and developing educational provision that would have a positive impact on a wider number of children and young people with SEMH.

The number of children accessing day provision in the independent sector with SEMH has started to increase again because of increased need for day places within the City and insufficient places in the day provision in the city to meet this demand. The cost of independent special school places exceeds that of special school places in Local Authority provision and also means that children are being transported to locations outside of the City. However, the Local Authority are funding places at Buglawton Hall which cannot be filled and which is located too far from the City to use for day places. This is therefore not an effective use of public resources and funding released from the closure of Buglawton Hall would be invested in additional day special school places within the City.

Manchester has developed an early help and social care offer including access to Family Support, Multi Systemic Therapy and has developed Alonzi House which provides intensive family support through an outreach and short breaks programme for young people aged 11 to 17 on the edge of care. In addition, the CAMHS offer also now includes an intensive outreach service. These developments mean that there is more support available within the City for children with SEMH and their families while they are attending day provision. The reducing demand for Buglawton Hall over the last 5 years also demonstrates the declining parental preference for this type of provision. Though there is support from parents of current pupils at the school, for Buglawton Hall to remain open.

There is also a small but significant number of young people requiring specialist 52 week residential therapeutic provision because of high levels of mental health need, often following access to tier 4 mental health provision. Currently, these children are placed in independent provision outside of the City which is jointly funded by Education, Health and Social Care and decisions to place children in this type of provision are made at a multi-agency resource panel. Plans are in place to develop an integrated commissioning team across the 3 services to coordinate and oversee these arrangements. Residential specialist provision will therefore still be available for those children where multi agency assessment shows that this is most appropriate to their needs. However, this will be jointly commissioned with Health and Social Care. Buglawton Hall is not able to meet the needs of this cohort because it cannot offer 52 week provision.

Pupil numbers and admissions

There are currently 14 pupils who attend Buglawton Hall School, three of them are placed by Cheshire East, Staffordshire and Stoke local authorities. Four of the pupils attend as day pupils. The others are residential from Sunday evening to Friday afternoon. All of the pupils are boys aged between 10 and 16. All the pupils have Statements/ Education, Health and Care plans for their social, emotional and mental health (SEMH) difficulties.

Arrangements for displaced pupils

Three of the pupils are in Year 11 and will leave Buglawton in July 2017. Arrangements for their post 16 education and training are already in place.

Manchester is committed to ensuring that all of the pupils on roll receive personalised provision to meet their needs. The pupils and their parents are having individual reviews of their Statements/Education, Health and Care plans which will look at their strengths and needs, their aspirations and future outcomes and the individualised provision required to meet them.

If the decision is made to close the school, Manchester pupils who wish to return to Manchester day provision will have a place available to them at one of the Federation day schools. Pupils who require residential provision will be able to transfer to other 38 week or 52 week provision depending on where their needs and outcomes can be best met. In some cases this provision will be jointly commissioned by education, health and social care. Manchester is in discussion with the local authorities responsible for the day pupils and other specialist day provision is being consulted. To ensure a smooth transition to new provision, all pupils would be supported by a caseworker who would co-ordinate the transition and multi-agency planning.

As part of the informal consultation process, local authority staff spoke to eight pupils. They all gave examples of what they enjoy at Buglawton Hall. They have good relationships with and respect for the staff, particularly with their key workers. Many of the pupils did say, however, that they would prefer to be at home and attend a school like Buglawton as a day pupil – 'a school you can walk to'.

Implementation

The process for school closure is set out in the Department for Education Statutory Guidance: Opening and Closing Maintained Schools – April 2016. The Local Authority proposes that Buglawton Hall School closes in stages between 22nd December 2017 and Easter 2018.

Impact on the community

During the informal consultation stage (from 9th March to 5th May 2017) the Local Authority consulted with Governors, Federation of SEMH Schools senior leadership, Buglawton Hall School staff, pupils and parents. In addition, the Local Authority has had discussions with Manchester schools, other local authorities and health commissioners.

Parents

The parents that the Local Authority have spoken to support the work Buglawton Hall School does and oppose the proposal to close. Some said they would not be able to keep their young person safe at home and would want another residential school if Buglawton were to close. Further discussions will take place with parents throughout the consultation period.

Staff

The vast majority of the staff live in Cheshire or Staffordshire, so would find it difficult to relocate to Manchester. Further meetings will be held with staff and their union representatives during the consultation period.

A full formal consultation with all affected staff at risk of redundancy will take place should it be determined that redundancies are required. Trade Unions and staff will be provided with a

consultation and implementation timeline outlining all stages of the process which will include a series of collective and individual consultation meetings which meet statutory redundancy consultation requirements as a minimum.

Other Federation schools

The revenue which would be made available through the closure of Buglawton Hall will be used to fund additional specialist places for children with SEMH in the City. There is currently a review of SEND provision in the City and this will project future numbers of children in the City who will require specialist SEMH provision and consider the potential for expansion of all special school places in the City, including schools for children with SEMH as well as opportunities to develop resourced provision for children with SEMH in mainstream schools.

Social care are planning to strengthen social care support to pupils of the Federation schools and their parents, by ensuring that social workers work more closely with the Federation schools' family liaison leads, the school CAMHS worker, therapists and Early Help staff, with one social worker playing a coordinating role so that families receive earlier support than currently and that all agencies are linking together effectively.

One of the aspects of life at Buglawton that pupils commented on most favourably is the range of sport and social activities they have access to. If the consultation leads to the closure of Buglawton, day Federation pupils could receive an enhanced Short Breaks offer; improving access to universal leisure and youth provision and providing some targeted activities in the evenings and holidays.

Future of the Site

Buglawton Hall is located in a rural setting with a number of buildings located on site although not all are in use or fit for purpose. Part of the building is listed. The school had a new residential block as part of Wave 1 BSF which was approved in 2008. The site is owned freehold by Manchester City Council.

During this initial period of consultation there have been a number of informal discussions with other potential providers with an interest in leasing the site for educational purposes. Discussions are ongoing.

Neighbours and suppliers

The rural location of the school means that the school has a small number of neighbours. A local farmer currently has an informal arrangement to use some of the school land. There is unlikely to be a significant impact in the local community if the site continues in use as a school. All neighbours of the school will be invited to comment on the proposal.

Businesses which currently supply the school with food and services will also be invited to respond to the proposal.

Travel

Currently, 10 pupils are transported to the school from Manchester on Sunday evenings and return on Friday afternoons – approximately 40 mile round trip. Most pupils also go home one evening during the week. Four pupils travel to the school daily from Cheshire East and Staffordshire. For the pupils who return to Manchester day schools there will be a significant decrease in daily travel by car. All pupils who require it will be offered independent travel training. For the pupils who transfer to other residential schools, car use will be similar. A full analysis of transport impact will be reported to Scrutiny Committee and Executive in September *Special educational needs provision* The proposal to close Buglawton Hall and discontinue with 38 week residential provision for pupils with SEMH will lead to overall improvements in the quality and range of educational provision for children in the City with SEMH because it will:

- Enable the development of additional specialist places in day provision for pupils with SEMH in response to increased demand for these places;
- Enable a coordinated approach from education, health and social care for all children attending day provision in the City and ensure families receive access to appropriate intervention and support when required;
- Enable the development of a greater range of specialist places for pupils with SEMH including resourced provision in mainstream schools; new types of alternative provision;
- Reduce the numbers of children with SEMH currently being placed in independent specialist day provision because the Local Authority cannot provide this provision.

The Stage 2 consultation process will take place from 16th June 2017 to 21st July 2017, 5 weeks. The final decision on this proposal will be made by Manchester City Council Executive on 13th September 2017 following discussion at Children and Young People's Scrutiny Committee on 5th September 2017.

Comments and objections to this proposal can be made online at: <u>http://www.manchester.gov.uk/consultations</u> by 21st July 2017

Report to Children and Young People's Scrutiny Committee and Executive: <u>http://www.manchester.gov.uk/meetings/meeting/2864/children_and_young_people_scrutiny_com</u> <u>mittee</u>

Date: 12th June 2017

Appendix A – Notice for publication

MANCHESTER CITY COUNCIL NOTICE OF PROPOSAL TO CLOSE BUGLAWTON HALL SCHOOL

Notice is given in accordance with the School Organisation (Establishment and Discontinuance of Schools) Regulations 2013 that Manchester City Council intends to close Buglawton Hall School, Buxton Road, Congleton, Cheshire East, CW12 3PQ by Easter 2018.

Buglawton Hall School is a local authority residential special school for boys from Year 5 to Year 11. The boys have Statements/Education, Health and Care plans for their Social, Emotional and Mental health (SEMH) difficulties. There are currently 11 Manchester pupils on roll and 3 from other local authorities. The school offers residential care from Sunday evenings to Friday afternoons 38 weeks per year. Buglawton Hall School is part of the Manchester Federation of SEBD Schools.

The number of pupils in the provision has lowered significantly as demand for this type of provision has reduced. There is much greater demand for specialist day placements in the city as the majority of young people want to be close to their links with the City of Manchester. Day provision within the city is currently at capacity.

Closing Buglawton Hall School will release high needs budget that will:

- Enable the additional places in day provision for pupils with SEMH
- Enable the development of an enhanced offer to all children attending day provision in the city, including better coordination between education and care, which will ensure families receive access to appropriate support when required
- Enable the development of a greater range of specialist places for pupils with SEMH, including resourced provision in mainstream schools and new types of alternative provision
- Reduce the number of pupils being placed in independent specialist day provision, because the local authority cannot provide this provision.

All pupils currently attending Buglawton Hall School and their parents will have an individualised plan for their move to new provision which will describes the personalised education and support they will receive.

This notice is an extract from the complete proposal. Copies of the proposal can be viewed on the local authority website at: <u>http://www.manchester.gov.uk/consultations</u> and comments and objections can be made online at this address.

Signed: Liz Treacy, City Solicitor

Date: 20th June 2017