



Kirklees
METROPOLITAN COUNCIL

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Ad Hoc Scrutiny Review into the

Councils Policy for the Letting of Council Premises/Facilities

February 2003

Kirklees Metropolitan Council

Date: 25th February 2003
Panel: Cllr Maggie Blanshard (Chair)
Cllr Kath Taylor
Cllr Karam Hussain
Contact Officer: Sally Bramwell

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Ad Hoc Scrutiny Review into the Councils Policy for the Letting of Council Premises/Facilities

1. Context and Purpose of the Review

1.1 The request to carry out a scrutiny review into the Councils Policy for the letting of Council premises/facilities was made by Kirklees Women's Network.

1.2 The Women's Network felt that a review should be established to look at the Councils policy for the letting of premises/facilities to groups and organisations who provide services for children and young people and whether measures were in place within lettings policies to ensure child protection i.e. are groups and organisations who let council premises/facilities to provide services for children and young people required to undergo a check by the Criminal Records Bureau (CRB)

1.3 Prior to the request being submitted to the Overview and Scrutiny Committee for consideration some initial research was undertaken in to the issues that had been raised by the Women's Network.

1.4 The research revealed that:-

- There are a number of services within Kirklees that are responsible for letting Council premises/facilities, principally – Community Support Services (CSS), Cultural Services and Kirklees Active Leisure.
- Lettings policies did not require groups/organisations that let Council premises/facilities to carry out CRB checks on employees and volunteers.
- Some groups/organisations are affiliated to national bodies e.g. Brownies, Guides, Scouts etc which have their own child protection policies and requirements that local groups have to follow.
- There is no legal obligation for the Council Services to require groups/organisations to carry out checks via the CRB. The legal obligation lies with the organiser of the activity/event. There is, however, doubt as to whether the Council has legal power to carry out such checks on third parties.
- Although there is no legal obligation on the Council to carry out CRB checks there is an issue as to whether the Council has a moral obligation to develop lettings policies to take better account of child protection issues e.g. making it a condition of letting that groups/organisations carry out their own CRB checks on staff and volunteers.

1.5 Based on the findings and conclusions of this preliminary research the Overview and Scrutiny Committee decided that it was appropriate to establish an Ad Hoc Scrutiny Panel to look further into the issue.

1.6 The Panel was made up of three Elected Members: - Cllr Maggie Blanshard (Chair), Cllr Kath Taylor and Cllr Karam Hussain and the following terms of reference were developed:-

- To formally check the legal (and moral) requirements of the Council and the limitations on its powers in relation ensuring child protection when letting Council premises/facilities to groups/organisations to provide services for children and young people.
- To find out if the Council could require groups/organisations who let Council premises/facilities regularly over a period of time, to carry out their own checks through the CRB and provide evidence to the Council to demonstrate that it has done so.
- To find out the implications and practical problems for the Council Service's responsible for letting Council premises/facilities, if it were a condition of letting that all groups/organisations who let Council premises regularly over a period of time had to carry out their own checks through the CRB and provide evidence to the Council to demonstrate that it has done so.
- To find out the implications and practical problems for the voluntary and community groups using Council premises/facilities if the Council made it a condition of letting that all groups/organisations who let Council premises regularly over a period of time had to carry out their own checks through the CRB and provide evidence to the Council to demonstrate that it has done so.
- To find out what approach other authorities take to this issue.
- To recommend a practical way forward.

1.7 The Panel would like to thank Officers from CSS, Cultural Services and Kirklees Active Leisure for their co-operation and assistance throughout the review. They would also like to thank those all the Community Groups who let Council premises/facilities for their response to the questionnaire that was sent out as part of this review.

2. Methodology

2.1 In order to conduct the review and meet the terms of reference the Panel carried out a number of separate pieces of work.

2.2 Investigations were undertaken with Legal Services in order to formally check the legal (and other) requirements of the Council and the limitations on its powers in relation ensuring child protection when letting Council premises/facilities to groups/organisations to provide services for children and young people.

2.3 The Services who are responsible for letting Council premises/facilities were identified during the preliminary research – Community Support Service, Cultural Services and Kirklees Active Leisure. Extensive work was carried out with these Services to find out what the potential problems and implications would be for them if the Council were to make it a condition of letting, that groups/organisations who let council premises/facilities regularly over a period of time in order to provide services for children and young people, carry out their own checks through the CRB and provide evidence to the Council to demonstrate that it has done so.

2.4 This included:

- obtaining the views of representatives from each service on the issue and their perceptions of the possible problems and implications.
- Gathering information on the number and types of groups/organisations who let Council premises; the sort of activities that they provided for children and young people; whether these groups/organisations were affiliated to a national body or organisation. The purpose of this was to establish the extent to which groups/organisations do not carry out CRB checks on paid and volunteer staff. It was hoped that this would enable the Panel to identify the level of work that might be involved for the Service and the groups/organisations if the Council were to introduce new conditions in relation to child protection (see appendix 1).

A survey was also done with all Directors to find out if any other Council Services were responsible for letting Council premises/facilities to groups/organisations

2.5 An information gathering exercise was also carried out with all the groups and organisations who let Council premises/facilities to provide services for children and young people – to find out what the potential problems and implications would be for them if the Council were to make it a condition of letting, that groups/organisations carry out their own checks with the CRB.

2.6 A questionnaire was sent out to every group/individual with the option to respond in writing, over the telephone or at a meeting that was arranged especially to allow them to feed back to the Panel their views on the matter.

2.7 The Panel commissioned a benchmarking exercise with other Local Authorities to find out what approach they take to the issue.

3. Findings

The findings of the review will be set out in turn to address the terms of reference.

3.1 To formally check the legal (and moral) requirements of the Council and the limitations on its powers in relation ensuring child protection when letting Council premises/facilities to groups/organisations in order to provide services for children and young people.

3.1.1 Investigations with the Councils Legal Services revealed that the Council does **not** have a legal responsibility to require that groups/organisations that let Council premises/facilities to carry out CRB checks on staff and volunteers. The legal responsibility for ensuring that children and young people are protected lies with the organiser or employer of the activity or event.

3.1.2 Legal Services did raise the issue, however, that despite the fact Council has no legal obligation to include such a requirement in the lettings policy – did it in fact have a moral obligation to do so, in order to support the protection of children and young people?

3.1.3 Legal Services also confirmed that there are limitations on the Council with respect to child protection. The Council could not carry out CRB checks on groups/organisations who wish to let Council premises/facilities to provide services for children and young people. The Council can, however, put reasonable conditions on its lettings. The Council could make it a condition of letting that the groups/organisations must be able to demonstrate that they have a child protection policy in place and/or have carried out CRB checks on staff and volunteers.

3.2 To find out if the Council could require groups/organisations that let Council premises/facilities regularly over a period of time, to carry out their own checks through the CRB and provide evidence to the Council to demonstrate that it has done so.

3.2.1 As stated in paragraph 3.1.3 Legal Services stated that legally the Council could make it a condition of letting that the groups/organisations who provide services for children and young people must be able to demonstrate that they have a child protection policy in place and/or have carried out CRB checks on staff and volunteers, before they can let Council premises/facilities.

3.3 To find out the implications and practical problems for the Council Service's responsible for letting Council premises/facilities, if it were a condition of letting that all groups/organisations who let Council premises regularly over a period of time had to carry out their own checks through the CRB and provide evidence to the Council to demonstrate that it has done so.

3.3.1 Investigations with representatives from CSS, Cultural Services, Kirklees Active Leisure demonstrated that their lettings policies are all very different and do not include a requirement that groups/organisations that let Council premises/facilities to provide services for children and young people under go a check by the CRB.

3.3.2 CSS do have a 'policy' of asking groups /organisations that let Council premises/facilities over a period of time, if they have a child protection policy in place. A number of points were raised in connection to this:-

- The policy is not strongly enforced
- The policy is not applied consistently – i.e. the question is not always asked
- Although the question may be asked, having a child protection policy in place is **not** a condition of letting.

3.3.3 Kirklees Active Leisure informed the Panel that carrying out child protection was not part of the formal booking arrangements (terms and conditions) in Leisure and Recreation Services.

3.3.4 Some conditions of letting in Cultural Services do directly relate to child protection i.e. 'details of compliance with Statutes and Regulations, including the Child Protection Act 1989' but it is questionable as to how well they are enforced.

3.3.5 CSS, Cultural Services, Kirklees Active Leisure all let Council premises/facilities such as Community Centres; Town Halls; Public Halls; Sports Centres (swimming pools, sports halls, gyms and outdoor pitches).

3.3.6 CSS and Cultural Services did point out, however, that there are many Community Centres no-longer managed by the Council but which are managed within the Community by management committees. The Council is only the landlord and, therefore, has no control over their lettings policies and who they let premises to.

3.3.7 The Services themselves let premises/facilities for sports and physical activities (such as karate clubs, football clubs, dance clubs etc); community and cultural activities (such as drama workshops, Caribbean cooking etc) and to uniformed and national organisations (such as Beavers, Cubs, Scouts etc) and individuals (for events such as birthday parties).

3.3.8 **Most** of the groups/organisations who let Council premises/facilities to provide clubs and activities do so regularly. Few are single or 'one off' bookings. In particular, Kirklees Active Leisure tends to deal with 'structured' clubs and insists that instructors/coaches are qualified. This can deter 'one off' bookings. It was pointed out, however, that given the time (up to 12 weeks), cost (up to £80) and bureaucracy involved in carrying out CRB checks, it would not be practical to make it a condition of letting for one off bookings. Equally, it would not be practical to insist that group/organisations letting council premises for a 'one off' booking had a child protection policy in place.

3.3.9 It was highlighted that many groups/organisations that provide activities/events and services for children and young people are affiliated to governing bodies (such as the Football Association and Girl Guiding UK) which require their local groups to have child protection policies in place and run their own CRB checks on staff and volunteers.

3.3.10 CSS, Cultural Services and Kirklees Active Leisure, therefore, carried out an audit of all the groups/organisations, which let Council premises and facilities. The purpose of this audit was to try and identify the extent to which groups/organisations that let Council premises/facilities were affiliated to governing bodies and as a result had a child protection policy in place and had CRB checks carried out on staff and volunteers.

3.3.11 The audit showed that 68% of the groups/organisations that responded are affiliated to national governing bodies though not all would have child protection policies in place or carries out CRB checks. Similarly, some of the 32% that are not affiliated to national bodies do have appropriate policies in place.

3.3.12 As a result of these findings CSS, Cultural Services and Kirklees Active Leisure said that they would support the introduction of child protection measures into the Councils lettings policies. They felt that it would be possible to formally incorporate in their lettings policies, conditions that would improve child protection i.e. that groups and organisations letting Council premises/facilities **regularly over a period of time** to provide services for children and young people must have a child protection policy in place and carry out their own checks through the CRB on all paid and voluntary staff and provide evidence to the Council to demonstrate that this is so.

3.3.13 It was also stated that it would be possible to provide support to those groups/organisations that do not currently have a child protection policy to develop one and to assist those who do not currently carry out CRB checks to do so.

3.3.14 Following on from the research with CSS, Cultural Services and Kirklees Active Leisure, further work was carried out to find out if other Services within the Council were responsible for letting Council premises/facilities to groups/organisations. Although it was found that this was not the case, an issue was raised around the letting of school premises/facilities.

3.3.15 Under the Local Management of Schools Agreement, the responsibility for the letting of school premises/facilities lies with individual schools. Although a policy on lettings is provided by the Local Education Authority (LEA) to schools it does not include any specific measures to ensure child protection. Any additional measures to ensure child protection could be developed and implemented by individual schools and could vary greatly.

3.3.16 The conditions of letting, which are set out for schools are required by the Council under the powers granted by Section 40 and Schedule 13 of the School Standards Framework Act 1998. The Council could, however, require 'further conditions in specific instances'. This implies that it could include child protection measures in its lettings policy that is supplied to schools.

3.4 To find out the implications and practical problems for the voluntary and community groups using Council premises/facilities if the Council made it a condition of letting that all groups/organisations who let Council premises regularly over a period of time had to carry out their own checks through the CRB and provide evidence to the Council to demonstrate that it has done so.

3.4.1 Following investigations with relevant Council Services the Panel carried out research in order to find out what the implications and practical problems would be for voluntary and community groups if new conditions of letting were introduced.

3.4.2 A questionnaire was sent out to all 124 groups/organisations that regularly let Council premises/facilities.

3.4.3 The questionnaire explained that from the work that had been carried out, the Panel was considering recommending that the Council make it a condition of letting that groups/organisations who regularly use premises/facilities in order to provide services for children and young people should :-

1. Have a child protection policy in place, which includes checks by the Criminal Records Bureau on paid and voluntary staff.
2. Demonstrate that the Criminal Records Bureau has carried out a check on all paid and voluntary staff.

The purpose of the questionnaire was to find out from the groups/organisations how these recommendations would affect them, particularly if they were not affiliated to a governing body, which provided the appropriate resource and support.

3.4.4 23% of the groups/organisations responded to the questionnaire.

3.4.5 The written responses to the questionnaire revealed that the child protection measures, which groups/organisations have in place are very mixed:-

- Some groups/organisations are affiliated to national bodies and as a result have a child protection policy in place and carry out CRB checks on all staff and volunteers.
- Some groups/organisations are not affiliated to national bodies but still have a child protection policy in place and carry out CRB checks on all staff and volunteers.
- Some groups/organisations are affiliated to national bodies and have either a child protection policy in place OR carry out CRB checks on staff and volunteers
- Some groups/organisations are not affiliated to national bodies and have either a child protection policy in place OR carry out CRB checks on staff and volunteers.
- Some groups/organisations are affiliated to national bodies and have no child protection measures in place.
- Some groups/organisations are not affiliated to national bodies and have no child protection measures in place.

3.4.6 What became apparent was that all those groups/organisations did not object to this becoming a condition of letting or demonstrating to the Council that they had child protection policies in place and had carried out CRB checks on staff and volunteers.

3.4.7 However, those groups/organisations that did not have a child protection policy in place and/or carry out CRB checks on staff and volunteers would require both support and resource to fulfil both requirements, i.e. support to develop a policy and support and resource to carry out CRB checks on all staff and volunteers.

3.4.8 In addition to the written responses the Panel held a meeting and invited groups/organisations to attend to discuss their proposals.

3.4.9 At this meeting a number of issues were raised by the groups/organisations around CRB checks:-

3.4.10. Who, within a group/organisation, do you check? Sometimes parents and volunteers help and assist with activities when coaches, instructors and other permanent staff are unavailable. Would they be prevented from helping out because they had not undergone a CRB check or would groups/organisations be advised to carry out CRB checks on them just in case they were required to help out?

3.4.11 If parents and volunteers were prevented from helping because they had not undergone a CRB check, this could be detrimental to the running of the club/activity. If groups/organisations were advised to carry out CRB checks on parents and volunteers just in case they were required to help out this would have huge cost and time implications and may also deter parents and volunteers from helping out – again this would be detrimental to the running of the club/activity.

The Panel appreciated this point and agreed that should this requirement be introduced it would be only apply to paid staff and designated volunteers who regularly instruct children and young people.

3.4.12 The cost and time associated with carrying out CRB checks, especially for smaller groups/organisations or those, which rely on volunteers could be detrimental to the running of the club/activity.

3.4.13 How often should you carry out a CRB check? It could be argued that to be effective it should be carried out every year and this again presents issues with cost and time, especially for smaller groups/organisations.

3.4.14 Is a CRB check the most effective way of ensuring child protection, especially if it is only done once? There are many different levels of CRB check and they only show actual convictions.

3.4.15 It was argued that having a CRB check does not mean that a person has sufficient knowledge of child protection or understands and appreciates child protection issues. The most effective way for groups/organisations to ensure child protection is to develop and implement a child protection policy and to carry out training on all staff and volunteers on child protection issues and to develop an awareness of what to look out for. It is important to recognise, however, that some groups/organisations, particularly those not affiliated to a governing body, would require support in order to develop and implement these policies and train staff and volunteers on child protection.

3.4.16 In conclusion, the groups/organisations who attended the meeting raised concerns about the proposals that the Council make it a condition of letting that they carry out CRB checks on all staff and volunteers. They did not, however, object to the proposal that the Council make it a condition of letting that groups/organisations have a child protection policy in place and are able to demonstrate this. The support for this proposal was dependent on support being made available to assist groups/organisations to develop and implement these policies and train staff and volunteers on child protection issues.

3.5 What approach do other authorities take to this issue?

3.5.1 In order to inform their discussions and final recommendations the Panel carried out a benchmarking exercise with relevant Services in other Local Authorities. The purpose of this exercise was to find out what provisions they had in place within their lettings policies.

3.5.2 Services in four local authorities were approached:-

- Culture and Leisure Services, Barnsley MBC
- Leisure Services, Leeds City Council
- Leisure Services, Wakfield MDC
- Education, Culture and Leisure Services, Rotherham MBC.

3.5.3 Each were asked if they could provide details of their lettings policy, and specifically, details of any provision, which were included in the lettings policy to ensure child protection.

3.5.4 Two of the four authorities responded to the request, Barnsley MBC and Leeds City Council.

3.5.5 Leisure Services at Barnsley MBC stated that they are no longer responsible for the lettings of Council premises/facilities. Sports facilities are now managed through a trust and most community centres have been handed over to groups to self manage. The responsibility for self managed community centres used to be a function of Leisure Services but this ceased to be the case several years ago.

3.5.6 Leisure Services at Leeds City Council stated that their lettings policy does not currently include measures to ensure child protection. They did, however, add that the whole issue of child protection is high on their agenda and that issues of lettings would be examined as part of any work that is undertaken.

4. Conclusions

4.1 From the information and evidence provided the Panel has concluded that although the Council has no legal responsibility to require that groups/organisations that let Council premises/facilities to provide services for children and young people carry out CRB checks on staff and volunteers, the Council does have a moral obligation to ensure, where possible, the protection of children.

4.2 The Panel accepts that the Council itself cannot carry out CRB checks on groups/organisations who wish to let Council premises/facilities in order to provide services for children and young people, but the research has shown that it is possible to put reasonable conditions on its lettings to ensure child protection.

4.3 The Panel identified that Council services do not have a consistent approach within their lettings policy to ensure child protection issues.

4.4 What the information did show, however, was that given the time (up to 12 weeks), cost (up to £80) and bureaucracy involved in carrying out CRB checks, it would not be practical to make it a condition of letting for one off bookings. Equally, it would not be practical to insist that group/organisations or organisations letting council premises for a 'one off' booking had a child protection policy in place.

4.5. The Panel, therefore, support the response from CSS, Cultural Services and Kirklees Active Leisure; that they felt that it would be possible to formally incorporate in their lettings policy conditions that would address child protection i.e. that groups and organisations letting Council premises/facilities **regularly over a period of time** to provide services for children and young people, must have a child protection policy in place and carry out their own checks through the CRB on all paid and voluntary staff and provide evidence to the Council to demonstrate that this is so.

4.6 The Panel also appreciates the proposal from the Services that it would be possible to provide support to those groups/organisations that do not currently have a child protection policy to develop one and to assist those who do not currently carry out CRB checks to do so.

4.7 The Panel are concerned, however, about two issues that were raised as a result of their investigations with Services. Firstly on the issue of the letting of School premises /facilities. They are concerned that child protection measures were not included in the lettings policy provided by the LEA and that individual schools were responsible for developing their own child protection measures. This could lead to huge variations between schools. They did accept, however, that schools were more likely to be extremely vigilant about child protection issues.

4.8 Secondly on the issue of community managed Community Centres. The Panel are concerned about the fact that the Council has little jurisdiction over the development and implementation of the lettings policies of these Community Centres or who they are let to.

4.9 The information and evidence that was provided by the voluntary and community groups revealed that they had concerns about the draft proposals that the Panel developed as a result of their investigations.

4.10 The Panel appreciates the concerns that were raised around making CRB checks a condition of letting.

4.11 The Panel also appreciates the argument that the most effective way for groups/organisations to ensure child protection is to develop and implement a child protection policy and to carry out training on all staff and volunteers on child protection issues. It also understands that some groups/organisations, particularly those not affiliated to a governing body, would require support in order to develop and implement these policies and train staff and volunteers on child protection.

5. Recommendations

Based on the findings and conclusions of this review the Panel recommends:-

5.1 That the Council make it a condition of letting that those groups/organisations who let Council premises/facilities to provide regular services for children and young people should have in place or should develop a child protection policy.

This policy should be appropriate to the group/organisation and should include processes to ensure that it is actively implemented within the group.

5.2 Services responsible for Council premises/facilities should actively monitor that those groups/organisations that hire those premises/facilities have a child protection policy in place and that it is implemented.

5.3 Services responsible for Council premises/facilities should provide support and guidance to groups/organisations to develop their child protection policy if required.

5.4 Services responsible for Council premises/facilities should provide training packages to groups/organisations to raise awareness of child protection issues.

5.5 The child protections policies of groups/organisations letting Council premises/facilities in order to provide regular services for children and young people, should include a commitment to move towards carrying out checks via the CRB on :-

- Coaches
- Instructors
- Leaders
- Volunteers who are regularly involved in the club/organisation and provide regular instruction to children and young people.

The commitment to achieve this should be reviewed by the relevant services in 2 years time.

5.6. That the relevant Cabinet Member(s) look at what the implications might be on leased premises if the Council makes it a condition of letting that all groups/organisations providing regular services for children and young people should have in place or develop a child protection policy e.g. Jarvis facilities and leased halls.

5.7. That the Education Service incorporates the recommendations of the Panel into the guidance that it provides to schools on the letting of premises/facilities.

6. Appendices

Appendix One

Nature of Lettings	Type of Activities	Type of Premises/Facilities Used	No. of Groups with Regular Lettings	No. of Attendees Per Session
Sports/Physical Activities	Karate Clubs/Events Jui Jitsue Clubs/Events Football Clubs/Events Rugby Clubs/Events Swimming Clubs/Events Gymnastics Clubs/Events Dance Clubs/Events Table Tennis Clubs/Events Cheerleading Groups	Community Centres Deighton Centre Hudawi Centres Town Halls Public Halls Sports Centres (Swimming pools, sports halls, gyms, outdoor pitches)	24 + 100s of lettings made by Leisure and Recreation	1-70
Uniformed/ National Organisations	Beavers Cubs Scouts Explorer Scouts Brownies Guides	Community Centres Sports Centres	15 + lettings made by Leisure and Recreation	15-30
Community and Cultural Activities	Paddock Women's Association Disco for Fundraising Community Gathering Pakistani Youth Council Caribbean Cooking Radio Skills Youth Arts Auditions Drama Workshop	Community Centres Hudawi Centre	15	5-150
Individuals	Birthday Parties Childrens Parties Eid Party	Community Centres Hudawi Centre	7	15-200

7. Cabinet Response and Action Plan

DEPUTY LEADER OF THE COUNCIL
Councillor John Smithson

Liberal Democrat Councillor for
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21 March 2003

When replying please quote the reference below:

DL1058/JS/TW/JH

Cllr Andrew Palfreeman
Chair of Scrutiny
Scrutiny Office
Town Hall
Huddersfield

Dear Andrew

RE: LETTING OF COUNCIL PREMISES – CHILD PROTECTION ISSUES

Further to your letter of 26 February and the report of the ad-hoc panel, I am happy to offer the following comments:

- Broadly, officers can comply with all the recommendations of the report and, furthermore, since 1998 have adopted a policy approved by Elected Members in this particular area of their management responsibilities
- There are only one or two issues which I have asked officers to address in the light of the Scrutiny report and these are:

The need to incorporate Child Protection Policy requirements into the formal agreement with one Athletics Club for the use of a particular running track

The need to incorporate a formal Child Protection Policy into the Memorandum of Understanding between Kirklees Active Leisure and the Council

I can assure you that all these actions will be addressed as a matter of urgency.

Please let me know if there is anything else I can do in this matter.

Yours sincerely

**COUNCILLOR JOHN SMITHSON
DEPUTY LEADER OF THE COUNCIL and
CABINET MEMBER FOR EDUCATION & RECREATION**

To: Sally Bramwell, Scrutiny Office
CC: Jonathan Drake; Richard Brooker; Philip Cotterill; Cllr J Smithson, Karen Johnson, Ken Blackburn
From: Gavin Tonkin
Date: 19 March 2003
Subject: Letting of Council Premises: Child Protection Issues

Thank you for your memo dated 26 February.

The recommendations are accepted by Cllr Smithson and myself.

It is important that we progress recommendations 5.1 to 5.5, taking into account the need, in some circumstances, to implement the changes over a period of time and to consider whether the staff referred to have the appropriate expertise. Staff responsible for hiring out premises are not always likely to have the appropriate knowledge.

5.3 & 5.4 It is agreed that an advisory pack for venue managers should be prepared and be available to all hirers whose events attract children as audiences or whose events are organised with children as participants. The pack can be prepared by Social Services and the Education Service together. This should be available in early summer.

It is important to incorporate into the formal memorandum of Understanding between the Council and KAL that a formal Child Protection Policy s introduced. This should not prove problematic and could be undertaken for 2003/04.

There are a number of Management Agreements with a range of organisations who manage community halls. Child Protection policies can be incorporated into the arrangements. However, many of these management groups hire out the facilities to other groups and it might be difficult to adequately monitor compliance. The advisory pack referred to above would again be of value.

5.6 We will investigate the potential implications and report back during the summer term.

5.7 Governing bodies will be advised of the amendments to the Guidance on letting premises. It forms a part of the LMS Scheme.

5.8 I think that these types of organisations should be encouraged as part of the Child Protection policies to seek CRB clearance. However, my current understanding is that the CRB is struggling to meet its obligations and some groups of staff and governors have been temporarily excluded from the process as a result.

I wish to point out that the LEA provides a model Child Protection Policy for each school governing body to adopt or to adapt. Ofsted Inspections check how these are implemented. Each school must have a teacher with responsibility for Child protection. There is no evidence from Inspections that there are wide variances between schools; indeed, Child protection arrangements are commented on as a strength.

**Gavin Tonkin
Director of Lifelong Learning**