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Meeting	Cabinet Resources Committee
Date	17 July 2012
<b>Subject</b>	<b>Consultation on proposed changes to the funding formula of Children's Centres</b>
Report of	Cabinet Member for Education, Children and Families
Summary	This report summarises the results of the public consultation on proposed changes to the formula funding for Children's Centres, which would redirect funding to areas of greatest need and remove the subsidy for childcare.
Officer Contributors	Jay Mercer, Deputy Director of Children's Services Stav Yiannou, Divisional Manager, Early Intervention & Prevention Team Zahid Parvez, Business Manager, Early Intervention & Prevention Team Suzy Whatmough, Business Project officer, Early Intervention & Prevention Team
Status (public or exempt)	Public
Wards affected	All
Enclosures	<b>Appendix 1: Equalities and Impact Assessment (outward)</b> <b>Appendix 2: Proposed Children's centres financial allocations</b>
For decision by	Cabinet Resources Committee
Function of	Executive
Reason for urgency / exemption from call-in (if appropriate)	Not applicable

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## 1. RECOMMENDATIONS

- 1.1 That the Committee, after giving careful consideration to the consultation process, the responses to the questionnaires and the Equalities Impact Assessment (EIA) appended to this report, give approval to the proposal to redirect Children's Centres' funding allocation into areas of greatest need, remove the subsidy for childcare and reward Children's Centres successfully in reaching vulnerable families through payment by results.
- 1.2 That the Committee give approval for this proposal to be implemented on 1 September 2012 and for Children's Centres that have childcare to receive transitional funding enabling them to plan for cost neutrality by 2014/15.

## 2. RELEVANT PREVIOUS DECISIONS

- 2.1 Cabinet Resources Committee 28 February 2012, Decision item 24: **Consultation on proposed changes to the funding formula of Children Centres.**
- 2.2 Cabinet Resources Committee 14 February 2011, Decision item 5 C: **Proposed reduction and redesign of Children's Centres and related services in Barnet.**
- 2.3 Delegated Powers Report no: 1663, **an increase in places offered under the Free Education for less advantaged Two Year Olds Scheme**
- 2.4 General Functions Committee on 28 June 2012, Decision item 10: **'Staffing Arrangements in Children's Centres'** resolved:
  - To note that the findings from the public consultation concerned with the proposed move to cost neutral childcare will be presented to the Cabinet Resources Committee on 17 July 2012.
  - To note the staffing implications of the proposed move to cost neutral childcare has been subject to statutory consultation with staff and Trade Unions in compliance with the Council's 'Managing Organisational Change' policy.
  - To agree, subject to Cabinet Resources Committee approval on 17 July of the move to cost neutral childcare, that the Assistant Director for HR be instructed to arrange with the Director for Children's Services for redundancy letters to be issued to those employees who have been made redundant as result of this funding scheme change.
- 2.5 Safeguarding Overview and Scrutiny meeting on 2 July 2012, **'Update on public consultation'** recommended:

The Cabinet Member for Education, Children and Families was requested to provide the 17 July 2012 Cabinet Resources Committee report on Consultation on Proposed Changes to the Funding Formula for Children's Centres to Safeguarding Overview and Scrutiny Committee Members, with a follow up report added to the Committee work programme if necessary.

A report on the Payment by Results mechanism would be added to the work programme for reporting to a future meeting of the Committee.

## 3. CORPORATE PRIORITIES AND POLICY CONSIDERATIONS

- 3.1 Children's Centres contribute to the priorities outlined in the Children and Young People Plan 2012/13, especially the commitments to:
- intervene early to strengthen families, ensuring the early identification of children and families to enable appropriate preventative interventions through the Common Assessment Framework (CAF);
  - ensure every child has a good start to life by providing access to high quality early years provision and support;
  - promote access for all children and young people to positive activities;
  - reduce economic disadvantage through tackling child poverty:
    - a) Ensuring access to affordable and suitable childcare;
    - b) Supporting parents to build confidence and skills;
    - c) Addressing health, including mental health, both as a cause and consequence of poverty.
- 3.2 Children's Centres also contribute to the priorities outlined in the draft Health and Wellbeing Strategy for Barnet 2012 – 15;
- Work in collaboration with partners in the statutory, commercial and third sectors, and with stakeholders in the community, to enhance individual and family self-reliance;
  - Narrowing the gap in terms of health and social care outcomes;
  - Expand the Family Nurse Partnership initiative to support families who are experiencing significant challenges;
  - Supports strategies aligned to the health and well-being related to young children.
- 3.3 The early intervention work carried out in Children's Centres helps to reduce the need for more intensive support later on, thereby improving life chances for children. This contributes towards the key Corporate Plan (2012/13) priorities 'better services with less money' and 'a successful London suburb'.

#### **4. RISK MANAGEMENT ISSUES**

- 4.1 The proposals, if implemented, would redistribute the Children's Centre budget, with consequent "winners" and "losers". The period for phased implementation is intended to minimise the need for redundancies. However, the timescales are tight as the first phase of the new proposed funding is intended to take effect from 1 September 2012. This could result in some staff working and being paid through their notice period. This applies in particular to teachers on one term's notice who would work through until December 2012. This presents a financial risk to the council. To help mitigate this all staff affected would be redeployed accordingly, where possible and subject to selection criteria in line with the council's "Managing Organisation Change" policy.
- 4.2 There is a potential reputational risk to the authority due to the high profile and sensitive nature of the project. Regular communication and engagement has taken place with all stakeholders including local families who use the centres, staff, advisory boards of Children's Centres, the wider community, service providers that may be affected including voluntary organisations and private sector providers, the Cabinet Member for Education, Children and Families, and trade unions. Please see section 9.7 for details on the methods of consultation.
- 4.3 If the proposed changes to the allocation of funding are implemented, two Children's Centres will be making changes to childcare delivery from 1 September 2012. Wingfield Children's Centre and Newstead Children's Centre are both reducing the number of weeks of childcare provision from 48 weeks to 38 weeks. This is due to a low take-up of

childcare during the school holidays, for example over the easter break in 2012, Wingfield CC had 3 children and Newstead CC had 23 children accessing a childcare place over this 2 week period. In addition, Wingfield Children's Centre will be reducing the opening hours of childcare provision from 8am-6pm to 8.30am-3.30pm. Both centres will be increasing the number of childcare places for certain sessions. All Children's Centres will continue to be open to deliver community based activities for 48 weeks per year.

- 4.4 To minimise the impact to families, the Council has provided business support to Children's Centres for planning their childcare provision. If these proposals are agreed, Children's Centres will also receive transitional funding for two years (2012/13 and 2013/14) to minimise the impact on families. Where necessary, the Council will support affected families in finding alternative childcare provision.
- 4.5 A total of 55 children may be affected by the proposed changes in Wingfield and Newstead Children's Centres. Out of these children, 13 receive funded childcare places as part of the Early Years Vulnerable Children (EYVC) scheme. These families will be supported in finding an EYVC place at an alternative setting. In September 2012 we are planning a pilot to extend the EYVC funding to Private, Voluntary and Independent early year's providers. The Council will be able to place EYVC in early years provision within easy reach of the families home.
- 4.6 There is a potential risk that Children's Centres with onsite childcare may need to increase their childcare fees if the childcare subsidy is removed as part of the proposed changes to the allocation of funding for Children's Centres. This may have an adverse financial impact on some parents of younger children or who purchase additional hours. However, disadvantaged 2 year olds and all 3 and 4 year olds will continue to be entitled to up to 15 hours a week of free childcare and low income parents will continue to be entitled to the Working Tax Credits which subsidise childcare.

## **5. EQUALITIES AND DIVERSITY ISSUES**

- 5.1 Barnet Children's Service operates in line with Barnet's Equality Scheme and equalities legislation. The Barnet Children and Young People Plan 2012-2013 states that 'All partners in Barnet's Children's Trust are committed to ensuring that children and young people, regardless of ethnicity, religion, disability, economic status or other differences, are able to access opportunities and activities, and are enabled to achieve their potential.'
- 5.2 An Equalities Impact Assessment (EIA) on the potential impact to children and families accessing childcare has been carried out (Appendix 1). The data has identified Black and ethnic minority families, lone parents, low income families, Muslims and Christians as groups which are at risk of being disproportionately affected if proposed changes to the allocation of funding are implemented. However, we will support all families in finding suitable alternative childcare provision where necessary.
- 5.3 The council has a legal requirement to have sufficient childcare provision across the borough and would want to minimise any impact of a reduction in service. The council's latest Childcare Sufficiency Assessment (CSA) in 2011 found that across the borough there is sufficient childcare provision. In the summer term of 2011 we had a total of 98% 3 and 4 years taking up their free early year's provision in a range of early year's settings. Over the period April 2011 – March 2012 we have seen 12 new early years providers register (an increase of 500 new places for 3-5 year olds) and 4 early years setting close (a reduction of 59 places for 3-5 year olds) in Barnet.

5.4 An Equalities Impact Assessment on the potential impact on staff in Children's Centres that could be affected has been completed. The make up of the workforce is predominantly female, which reflects the national profile in this area of work (early years and childcare focussed work). In addition, the workforce is predominantly born between 1951 and 1965, White, Christian and Heterosexual, which reflects the profile of workers in Barnet Council.

## **6. USE OF RESOURCES IMPLICATIONS (Finance, Procurement, Performance & Value for Money, Staffing, IT, Property and Sustainability)**

6.1 The total budget for Children's Centres is contained within the early intervention and prevention budget in Children Services with some funding from the Dedicated Schools Grant.

6.2 The council is proposing a 2012/13 budget and spend for Children's Centres of £4.3m. There is no change from 2011/12 budget.

6.3 The proposal is to redistribute the £4.3m budget to Children's Centres activities based on local need/deprivation and remove the existing childcare subsidy in Children's Centres that provide childcare.

6.4 The proposed reallocation of funding would result in some Children's Centres securing additional funding. Children's Centres that have childcare on site would see a reduction in funding. This is largely driven by the funding formula removing the subsidy of childcare. Appendix 2: Proposed Children's centres financial allocations

## **7. LEGAL ISSUES**

7.1 The council has an overarching duty to secure sufficient childcare provision in its area to meet the requirements of working parents pursuant to section 6 of the Childcare Act 2006. Childcare provision is an important function of the council and this duty is partially met through provision of childcare in children's centres. The sufficiency of childcare provision is addressed in the body of this report.

7.2 With regard to the consultation process the principles are well established in law. Consultation must be fair and can only be considered as proper consultation if the following are satisfied: (1) comments must be genuinely invited at the formative stage, (2) sufficient reasons for the proposal must be given to enable those being consulted to be properly informed and to enable them to give an informed response, (3) sufficient time must be given to allow those consulted to consider the proposal and give a considered response, (4) there must be a mechanism for feeding back the comments and those comments must be taken into account by the decision maker when the final decision is made. The methods of consultation as well as the responses, comments and suggestions are contained within the body of this report.

- 7.3 Equality and diversity issues are a mandatory consideration in decision making in the council. This requires officers and members to satisfy themselves that equality considerations are integrated into day to day business and that any proposal has properly taken into consideration what impact, if any, there is on any protected group and what mitigating factors can be put in place. The results of consultation together with the analysis of any potential impact on a protected characteristic must be considered before reaching a final decision on this proposal. The Equalities and Impact assessment is appended to this report.

## **8. CONSTITUTIONAL POWERS**

- 8.1 The council's constitution in Part 3, Responsibility for Functions, paragraph 3.6 states the terms of reference of the Cabinet Resources Committee.

## **9. BACKGROUND INFORMATION**

### **Free childcare for 2, 3 and 4 year olds**

- 9.1 The Childcare Act 2006 requires local authorities to make available 570 hours a year of free early education over no fewer than 38 weeks of the year. All three and four year olds are eligible for up to 15 hours of free early years provision up to 38 weeks per year (term time only) free of charge. Children become eligible the term after their third birthday. The free early years provision can be accessed in accredited childminders, pre-schools and nurseries, Children's Centres and maintained nursery classes/schools. As at 31 May 2012 a total of 248, 3 / 4 years olds were accessing their 15 hours of free early years provision in Children's Centres and a total of 2936, 3 / 4 year olds, in private, independent and voluntary early years provision.
- 9.2 Eligible two year olds are able to access up to 10 hours per week of free early years provision up to 38 weeks per year (term time only) free of charge. Children must meet a range of criteria based on their economic circumstances and child/family characteristics. Children who meet the criteria are eligible the term after their second birthday. The free places can be accessed in selected childminders, pre-schools and nurseries and Children's Centres. As at 31 May 2012, 54 two years olds accessed childcare in Children's Centres through the two year old scheme and 123 two year olds accessed the childcare in private, independent and voluntary early years provision.
- 9.3 Funding for the 2 year offer has been allocated through the Early Intervention Grant. We are planning to offer up to 500 free childcare places in Children's Centres and private, independent and voluntary early year's provision by September 2013 to the most disadvantaged 2 year olds.
- 9.4 Barnet Council operates the Early Years Vulnerable Childcare (EYVC) scheme which offers up to 15 hours additional free childcare for vulnerable children aged 2 – 5. Currently families can access childcare at a Children's Centre, and from September 2012, we are planning to roll this offer to private, voluntary and independent early years childcare providers. This will enable Barnet Council to reach more families and make the offer within easy reach of these groups of families.

### **Review of Children's Centres**

- 9.5 The Government has committed to a national network of Children's Centres refocusing them to their original purpose to meet the needs of the most vulnerable and maintaining a universal offer.

The Government have indicated an increased participation of voluntary and community sector involvement with children's centres – ensuring good accountability arrangements, and increasing the use of evidence-based interventions whilst operating payment by results (outcomes) methodologies.

Therefore the 'reform' of children's centres must include:

- Increased voluntary and community sector involvement in provision;
- improved accountability arrangements;
- increased the use of evidence based interventions;
- Increased focus on the 'most needy', i.e. through greater targeting;
- Introduction of payment by results based on outcomes.

9.6 In 2010/2011 the Council undertook a review of Children's Centres and related Commissioned Services, to explore and develop a business plan for alternative models that would meet the coalition governments plans and the Council's objectives, and reduce the need for acute and specialist provision. The business plan proposed the journey of Barnet Children's Centres as follows:

### **Stage 1**

To refocus Children's Centre to meet the needs of the most vulnerable communities whilst maintaining a universal offer.

In April 2011, following the review, Barnet Council established a network of 13 full Children's Centres and eight linked outreach venues, providing borough wide coverage to children under 5 and their families. As part of this network the Council provided integrated education and childcare in seven Children's Centres (Coppetts Wood Primary School and Children's Centre, The Fairway Primary School and Children's Centre, The Hyde Primary School and Children's Centre, Newstead Children's Centre, Parkfield Primary School and Children's Centre, Underhill Infants School and Children's Centre and Wingfield Children's Centre). These centres provide onsite childcare between 8am – 6pm, (10 hours per day), 5 days a week over 48 weeks of the year. This was continued despite the Government no longer requiring Children's Centres to offer childcare as part of their core offer.

### **Stage 2**

To reconfigure the funding formula so that is targeted and better serves vulnerable communities.

The review recommended that the funding formula be more closely aligned to the number of children, areas of highest deprivation and cost neutral childcare provision to reflect this shift in policy. Officers subsequently convened a working group, including representation from Children's Centre Managers, a Headteacher and a School Governor to discuss proposals, test ideas, and develop a new proposed funding formula for Children's Centres that reflected these objectives. This work resulted in the proposed changes to the formula for funding Children's Centres, which is the subject of this report

As a result, Children's Centres that are receiving an increase in their allocations will be using this extra money by employing additional family support staff to reach out to more vulnerable families in their respective communities. This will be further encouraged through the targets agreed for payment by results. This will mean communities from the more deprived areas will be better served with a wider range of services tailored to their needs. Children's Centres that are seeing a reduction in their allocation will be running

the same level of community based activities as they currently are. There will be no change to the childcare offer in 5 of the Children’s Centres who offer childcare. Two Children’s Centres, Newstead and Wingfield are re-aligning their childcare offer.

### Stage 3

The review recommended exploring the different service delivery mechanisms for delivery of Children’s Centres, incorporating the voluntary and community sector. The scope of this work will begin in the financial year 2012/13

## 9.7 Methods of consultation

The consultation on the proposed changes to the Children’s Centre funding formula commenced on 4 May 2012 and ended on 15 June 2012. A series of consultation activities and events were planned throughout the consultation period. The consultation activities and events were publicised in advance and Children’s Centres (managers and staff/Heads/Governors/ parents), stakeholders and Barnet residents were invited to attend. This helped to ensure that any concerns raised by those involved in Children’s Centres were discussed and, where possible, addressed at an early stage. Consultation was carried out through a number of methods;

- Key stakeholders were emailed a consultation paper containing information about the proposed funding formula for Children’s Centres and how to respond to the consultation. The distribution included schools with a Children’s Centre onsite, staff working in a Children’s Centre, Trade Unions, Early Years professionals and voluntary organisations working in a Children’s Centre.
- Hard copies of the consultation paper on the Children’s Centres funding formula were distributed to all Children’s Centres and all libraries in the borough with an accompanying cover letter.
- A series of meetings were held for stakeholders.
- Consultation meetings for parents / carers were publicised in the local press.
- Responses could be made by email, post or by completing an online survey.
- Queries could be raised by email, post, telephone or at the consultation meetings.

9.7.1 Consultation meetings with stakeholders were held during the consultation period. This ensured that any concerns raised could be discussed and, where possible, addressed at an early stage. The table below details the meetings and attendance.

Stakeholders	Date and time	Venue	Number of attendees
Staff and Trade unions	Tues 8 May 6.30-7.30pm	North London Business Park	8
Governors and Advisory Board members	Wed 9 May 6.30-7.30pm	North London Business Park	11
Staff and Trade unions	Tues 15 May 6.30-7.30pm	North London Business Park	9
Early Years Professionals	Wed 16 May 2-3pm	North London Business Park	5
Parents / Carers	Tues 22 May 7-8pm	Edgware library	1
Parents / Carers	Wed 23 May 6.30-7.30pm	Chipping Barnet Library	5
Voluntary sector	Wed 30 May 2-3pm	North London Business Park	7

Parents / Carers	Wed 30 May 6.30-7.30pm	Hendon Town Hall	1
Parents / Carers	Thur 31 May 6.30-7.30pm	Mill Hill Library	5
Parents / Carers	Thur 7 June 6.30-7.30pm	North London Business Park	3
<b>Total</b>			<b>55</b>

## 9.8 Consultation question responses

### 9.8.1 The question asked was:

“Do you agree that the proposed method for funding Children’s Centres is a fairer way of targeting resources to meet the needs of vulnerable families and the local community?”

The total number of responses received was 579.

Overall, 347 (60%) respondents disagreed with the proposal, 197 respondents (34%) agreed, 29 (5%) neither agreed nor disagreed and 6 (1%) did not know.

### 9.8.2 The make up of respondents to the questionnaire were:

- 322 parents / carers, of which one third (34%) agreed with the proposal.
- 94 Children’s Centre / School staff, of which almost half (47%) agreed with the proposal.
- 68 Barnet residents, of which one respondent agreed with the proposal.
- 95 others (includes governors, advisory board members and not stated), of which 45% agreed with the proposal.

The table below summarises responses by stakeholder type.

Stakeholder type	Agree	Neither/ Don't know	Disagree	Total
Parent / Carer	109	23	190	<b>322</b>
Children's Centre / school staff	44	4	46	<b>94</b>
Voluntary Sector	4	0	4	<b>8</b>
Governor / Advisory Board member	7	0	4	<b>11</b>
Resident	1	1	66	<b>68</b>
Other	7	3	11	<b>31</b>
Not stated	15	4	26	<b>45</b>
<b>Total</b>	<b>197</b>	<b>35</b>	<b>347</b>	<b>579</b>

### 9.8.3 From all responses received, a total of 168 respondents stated their postcode. The largest group of respondents were from the N2 postcode area (46), followed by the HA8 postcode area (26).

- In N2, all 46 respondents disagreed with the proposals
- In HA8, 26 respondents were received of which 18 respondents agreed with the proposals

### 9.8.4 The responses varied from the stakeholders at each Children’s Centre. The Children’s Centres which had the highest numbers of stakeholders responding were:

- Newstead Children’s Centre had 157 respondents, of which 153 respondents disagreed with the proposal

- Underhill Infants School and Children’s Centre had 68 respondents of which 58 respondents disagreed with the proposal
- Fairway Primary School and Children’s Centre had 62 respondents of which 43 respondents disagreed with the proposal

These three Children’s Centres offer childcare and are seeing a reduction in the proposed funding allocation.

Overall, stakeholders from Children’s Centres that would see an increase in funding tended to agree with the proposal, whereas stakeholders from Children’s Centres that would see a reduction in funding tended to disagree with the proposal.

9.8.5 Stakeholders that agreed with the proposals commented that it was a fairer way to distribute the allocations and agreed it focussed on targeting and work with the most vulnerable and disadvantaged families. Stakeholders that disagreed with the proposals tended to disagree with the childcare subsidy being removed, although some commented that they did agree that funding should take into account the level of deprivation and the number of under 5s

9.8.6 Equality monitoring data was collected for respondents who submitted on the online survey (162 respondents). The analysis found no particular associations between certain equality groups agreeing or disagreeing with the consultation question.

## 9.9 Queries and comments raised by stakeholders

Consultation response - queries/comments		Local Authority response
Community Activities and Payment by Results	Children’s Centres potentially gaining additional funding can increase services and reach more families. But there might be fewer community activities delivered in other centres.	The proposal ensures funding is fairly distributed according to the level of deprivation and the number of under 5’s in each of the Children’s Centre reach areas, enabling more vulnerable families to be reached.
	Payment by Results won’t lead to improved service delivery.	The Local Authority will mutually agree with the Children’s Centre the targets in advance, and the Centres will be supported in achieving their targets.
	The total budget is being cut and Children’s Centres might close.	The total budget is the same and all 13 Children’s Centres and linked venues will remain open.
Childcare	Staff redundancies in Children’s Centres.	Four Children’s Centres will be making changes to staffing. A total of 32 “at Risk” letters have been sent to Children’s Centre staff. Affected staff will be ringfenced to apply for other Children’s Centre roles. In total the proposal is that 4 posts will be deleted from the structure, the remainder are to be restructured.
	Potential impact on childcare delivery.	Only two Children’s Centres have proposed changes to childcare delivery from September 2012. All other Children’s Centres with childcare will remain the same.

	Adequate provision of childcare which would impact on parents' ability to work full-time.	We have a legal duty to ensure that there is sufficient childcare provision across the borough. We have reviewed this in March 2011 and there is sufficient provision. We would support the families to find alternative childcare.
	Private, voluntary and Independent sector providers may not offer the same support for vulnerable families.	Barnet has a total of 122 private, voluntary and independent providers offering free early years provision of which 15 are Ofsted graded 'outstanding', 76 are graded 'good', 24 are graded 'satisfactory' and 7 are due a first inspection. In addition we have 404 childminders offering childcare.

### 9.9.1 Suggestions made by stakeholders

<b>Consultation response – suggestions</b>	<b>Local Authority response</b>
Merge Children's Centres to reduce running costs and to ensure that all remaining centres can offer a full range of services including childcare.	Barnet Council reconfigured the Children's Centres in 2011 from 21 Children's Centres to 13 Children's Centres and 8 linked venues.
Reduce funding for 8 linked outreach venues.	The allocation takes into account the linked outreach venues and this represents 8% of the total Children's Centre budget.
Target funding towards the provision of childcare for vulnerable families.	There is a range of support available for families accessing childcare including the free early years provision for three and four year olds, targeted funding for 2 year old childcare places, additional funded hours for vulnerable children and working tax credit for low income families.
Consider charging / increasing charges for other Children's Centres activities.	We are currently exploring a model for charges of community based activities in Children's Centres. School based Children's Centres, with childcare are able to set their fees at the market rate, whilst Council managed Children's Centres will increase their charges according to the Council framework for fees and charges, annually.

### 9.9.2 Conclusion

This proposal is intended to benefit more families through transferring resources into additional outreach and community activities. 15 hours of free childcare a week (for up to 38 weeks) will still be provided through government funding for 3 and 4 year olds and 10 hours funding (for up to 38 weeks) for eligible 2 year olds. Vulnerable children who require additional hours will continue to be funded by the Council, low income working

parents will still be able to claim working tax credits to offset the cost of additional childcare hours for their children. A relatively small number of parents on higher incomes might have to pay higher charges for additional childcare if centres decided they need to raise more income.

The consultation has not revealed any further unplanned-for negative implications of the proposed changes that cannot be mitigated. Where identifiable, responses linked to Children's Centres who would gain budget show a very high proportion in favour of the proposal with a low proportion against. Responses linked to Children's Centres who would lose budget show a high proportion against the proposal. On balance therefore, in view of the wider benefits for significant numbers of families, it is recommended that the proposal should proceed.

## **10.0 LIST OF BACKGROUND PAPERS**

10.1 None.

Legal- HP

Finance- JH/MC