

	<p style="text-align: center;">CHILDREN, EDUCATION, LIBRARIES & SAFEGUARDING COMMITTEE</p> <p style="text-align: center;">18 July 2017</p>
<p style="text-align: center;">Title</p>	<p>Barnet Ofsted Inspection of services for children in need of help and protection, children looked after and care leavers</p>
<p style="text-align: center;">Report of</p>	<p>Strategic Director for Children and Young People</p>
<p style="text-align: center;">Wards</p>	<p>All</p>
<p style="text-align: center;">Status</p>	<p>Public</p>
<p style="text-align: center;">Urgent</p>	<p>No</p>
<p style="text-align: center;">Key</p>	<p>No</p>
<p style="text-align: center;">Enclosures</p>	<p>Appendix 1: Ofsted Inspection report Appendix 2: Ofsted guidance for inadequate local authorities Appendix 3: Department for Education guidance for inadequate local authorities Appendix 4: Draft Ofsted Improvement Action Plan Appendix 5: Draft LSCB Improvement Action Plan</p>
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Summary

Ofsted, the Office for Standards in Education, Children's Services and Skills, inspect and regulate services that care for children and young people, and services providing education and skills for learners of all ages.

Ofsted undertook a Single Inspection Framework (SIF) of the London Borough of Barnet's services for children in need of help and protection, children in need of help and care leavers during April and May 2017. As part of this inspection there was also a review of the effectiveness of the Local Safeguarding Children Board (LSCB).

Overall children's services in Barnet have been judged by Ofsted to be inadequate. The Local Safeguarding Children Board was also judged inadequate. The Council fully accepts the findings of the report.

Issues about the quality of children’s social care services in Barnet were identified and presented to Members of CELS in September 2015 and July 2016. As a result the Council established a Social Work Improvement Board and began a major improvement programme working with Essex County Council as Improvement Partners.

Although there is emerging evidence of practice improvement, especially since the appointment of Practice Leaders in October, this is not sufficiently consistent and there needs to be, as Ofsted recommend (Ofsted Recommendation 1- Page 8), *a continued and sustained focus on improving core social work practice strategically and operationally, to equip practitioners and managers to deliver good-quality services to children and their families.*

The focus of the draft Improvement Action Plan is to enhance our practice leadership and core social work skills, ensuring that there is more understanding of the lived experience of children and young people and on improving their outcomes. This is to be achieved at pace. Given the recent improvement we can, and should remain ambitious about the quality of services we deliver. Our aim is to be re-inspected as a good service within the next two years. This is and will remain a top priority for the Council.

This report includes key findings from the inspection report as well as an overview of the draft ‘written statement of action’ (draft Improvement Action Plan) which the authority is required to complete and submit. The report also includes the immediate actions which have been undertaken since the Ofsted Inspection.

This report summarises guidance from Ofsted and the Department for Education in relation to Local Authorities which have received an overall judgement of inadequate. Ofsted will undertake a series of activities including an action planning visit, a programme of quarterly monitoring visits and a re-inspection once the period of monitoring has ended. The authority is also subject to intervention by the Department for Education (DfE) until services are improved.

Recommendations
1. That the Committee note the findings of the Ofsted Single Inspection Framework carried out between 24 April and 18 May 2017 as set out in paragraph 1.13 and Appendix 1
2. That the Committee note the guidance from Ofsted in relation to Local Authorities which have received an overall judgement of inadequate as set out in paragraph 1.17 to 1.24 and Appendix 2
3. That the Committee note the guidance from the Department for Education in relation to Local Authorities which have received an overall judgement of inadequate as set out in paragraph 1.25 to 1.27 and Appendix 3 (pages 53 - 57) and note that a commissioner for Children’s Services will be appointed for an initial three-month period.
4. That the Committee agree the draft Improvement Action Plan for consultation set out in Appendix 4 and delegate to the Strategic Director for Children and Young People in consultation with the Chief Executive and Lead Member authorisation to complete and submit the plan within the 70 day requirement for Ofsted.
5. That the Committee note the draft LSCB Improvement Action Plan for consultation set out in Appendix 5.

6. That the Committee agree that each Children, Education, Libraries & Safeguarding Committee meeting will have a standing item on the progress of implementing the Improvement Action Plan.

1. WHY THIS REPORT IS NEEDED

1.1 Ofsted, the Office for Standards in Education, Children's Services and Skills, inspect and regulate services that care for children and young people, and services providing education and skills for learners of all ages.

1.2 Ofsted undertook a Single Inspection Framework (SIF) between 25 April and 18 May 2017. The SIF inspection reviewed the following:

- **Children who need help and protection.** These are children and young people who are, or who are likely to be, at risk of harm or who are the subject of concern and are identified and protected. This includes preventative services to reduce the likelihood of harm escalating and statutory social work services for those where there are significant levels of concern about children's safety and welfare. It also includes children and young people who are missing from education or being offered alternative provision.
- **Children looked after and achieving permanence.** These are children and young people looked after.
 - **Adoption.** Children who are unable to return home or to their birth families and who need a permanent alternative home. Adoption services cover the recruitment and assessment of foster carers and support for children, young people, families and carers to develop safe and secure relationships.
 - **Experiences and progress of Care Leavers.** Young people aged 16 to 25 who are preparing to leave care or who have left care. The services provide young people with opportunities, support and help to enable them to move successfully to adulthood.
- **Leadership, Governance and Management.** This addresses the effectiveness of leaders and managers and the impact they have on the lives of children and young people and the quality of professional practice locally.

1.3 The overall judgement of the inspection is that Barnet's Children's Service is inadequate. The overall effectiveness judgement is derived from performance in each of the key judgements. An inadequate grade in either the arrangements to help and protect or look after children and young people will always result in an overall effectiveness judgement of inadequate.

1.4 The grading for each part of the SIF are as follows:

1. Children who need help and protection	Inadequate
2. Children looked after and achieving permanence	Inadequate
2.1 Adoption performance	Requires Improvement

	2.2 Experiences and progress of care leavers	Requires Improvement
3. Leadership, management and governance		Inadequate
4. Local Safeguarding Children Board		Inadequate

Main Concerns from the Ofsted inspection

1.5 Since Ofsted introduced a new SIF in 2012, 136 local authority children's services have been inspected. Of these 33 have been judged inadequate, 62 require improvement, and 39 are good and 2 are outstanding.

1.6 The Ofsted inspection report is included at Appendix 1. The report goes into detail about the inspection's finding against each part of the SIF and includes 19 recommendations. The Council fully accepts the findings of the inspection and is committed to taking action to rectify the issue identified. The main themes that Ofsted identified are as follows:

- 14 of the 19 recommendations relate to two key areas:
 - enhancing our practice leadership
 - enhancing our core social work skills

Within these areas more understanding is needed of the lived experience of children and young people and on improving outcomes
- The other recommendations relate to specific areas of work:
 - Improving our approach to homeless young people ensuring they are supported
 - Enhancing our Private Fostering awareness raising and assessment processes
 - Expanding and improving our life-story work to ensure all children in permanent placements have an understanding of their past.
 - Establishing more workshops for care leavers on areas like money management helping them to prepare for independence.
 - Improving our approach to connected carers

Improving Children's Social Care Services in Barnet

1.7 The Council accepts the findings and recommendations of the Ofsted Inspection report in full.

1.8 Barnet fully accepts the need to improve and had begun to take proactive action well ahead of the Ofsted inspection, this is noted by Inspectors (Page 28 – Ofsted Inspection Report).

'Since April 2016, senior leaders have focused on creating the right infrastructure and staffing requirements to support wholesale practice improvement. Improvements include the creation of additional social work posts and teams to reduce caseloads, significant investment in improving the local authority's electronic recording systems and more accurate performance management reporting. In October 2016, there was

further investment in senior practice leadership to enable a focus on quality of practice and children's experiences. The very recent improvements are a result of this. However, there is recognition that there is much more work to do to ensure that all managers and staff embed a culture of positive social work practice across the organisation.

Senior leaders and elected members demonstrate a clear understanding of areas for development within children's social care, and a commitment to improving services for children and families in Barnet. The local authority has secured ongoing financial support and expertise across the council to support improvements. Collaboration with its collegiate partner and strengthened governance arrangements, including the social work practice improvement board chaired by the chief executive officer, monitor and scrutinise performance in areas already identified for improvement and development.'

1.9 The objectives of Practice Improvement Plan 2016-17 were to build a sustainable foundation from which social work can improve, key achievements to date are included in the draft Improvement Action Plan, some of which are:

- A more stable workforce, turnover rate reduced from 39% (Sept 2015) to 12.76% (March 2017) as part of a focus on recruitment, development and retention of social workers and social work managers in frontline practice
- More manageable workload social care workloads with a reduction from 37.5 (January 2016) to 12.7 (April 2017) in the Duty and Assessment team and from 18.7 to 14.6 in Intervention & Planning team over the same time period
- Creation of more and smaller social care teams to allow team managers to know both staff and families well. There was a reduction in the ratio of managers to social workers from 1:13 in April 2016 to 1:6 in April 2017 and additional management capacity in MASH.
- Improvements in appropriate practical support - removal of inefficient WISDOM system and configuring the Early Help system to enable partners to access. Over 130 IT issues were resolved including key changes to systems and forms in response to needs.
- The Chief Executive, along with partners of the LSCB, commissioned a review of the LSCB to understand the effectiveness.

1.10 Family Services has developed a draft Improvement Action Plan for consultation (see Appendix 4) based on inspection findings and recommendations. This Action Plan builds on the improvement programme already established, but focuses more rigorously on practice leadership, core social work skills and understanding of the lived experiences for children and young people.

1.11 Family Services will continue to work with Essex as collegiate partners in delivering the programme.

1.12 Securing sustainable improvement is a long-term endeavour, research describes a two to three year journey of working together to create a strong, stable and well-functioning service.

Findings from Ofsted Inspection Report (Appendix 1)

1.13 The Summary for Children and Young People from the Ofsted report states (Page 10 – Ofsted Inspection Report):

- *Too many services for children and young people in Barnet are poor. Senior leaders know this and have started to do something about it by making changes and focusing on recruiting good-quality staff to work with children and young people, but it is taking too long. This means that some children and young people in Barnet are not kept safe from harm.*
- *Senior leaders, all managers and social workers do not find out enough about what it is like to be a child or young person living in Barnet who needs help or protection. Social workers do not always respond at the right time to help children.*
- *When professionals tell social workers that children and young people need help, social workers do not always act quickly enough to help them.*
- *In almost all cases, social workers do not make enough effort to find out what children and young people want or need. This means that plans to help children and young people in need are not very good. It is not clear what is going to happen, or by when, to improve children's and young people's lives.*
- *Not all social workers are good at working out the risk of dangers to children and young people. They do not always make sure that children and young people are receiving the right services from the right people.*
- *Social workers' managers do not guide them to make sure that they are getting things right. When they do, they do not always write this down so that they can check that it has happened.*
- *The majority of children and young people in care live with someone who knows them well, listens to them, looks after them well and keeps them safe. Children and young people told inspectors that they are happy where they are living and that their achievements are celebrated.*
- *Social workers do not always bring children into care soon enough.*
- *Young people who go missing from care receive a poor service, because social workers do not find out enough about the risks to them. This means that young people who go missing are not always kept safe enough from dangers, such as gangs or adults sexually exploiting them.*
- *Once it is agreed that children in care are to be adopted, they receive a good service.*
- *Young people leaving care receive a better service from members of staff who know them well, find out what their basic needs are and put clear plans in place to meet their needs.*

1.14 Local Safeguarding Children's Board, an independently chaired multi-agency group, was inspected by Ofsted at the same time as the Local Authority and key findings from this report are as follows:

- The Barnet Safeguarding Children's Board is not effective in discharging all of its statutory functions. Monitoring of frontline practice has been poor and insufficient.
- The board does not have robust scrutiny of statutory requirements, such as the arrangements for children in private fostering or the monitoring of the quality of multi-agency safeguarding training.
- The learning and improvement framework is not fully implemented, as there is no programme of multi-agency audits.
- The processes to review child deaths work well, and there is an effective multi-agency rapid response to unexplained deaths.

1.15 A draft Improvement Action Plan which responds directly to the improvement recommendations in the Ofsted report and the LSCB review has been developed for consultation (Appendix 5). The objectives are;

- Leadership, management and governance arrangements will deliver strong, strategic local leadership that measurably improves outcomes for vulnerable children.
- Professional relationships between the partner organisations will mature and develop so that partners are able to hold each other to account.
- Accountabilities are embedded and will result in confident, regular evaluation and improvement in the quality of help, care and protection that is provided.
- Children, young people and families will clearly benefit from improvements that are made and the impact of their feedback is well evidenced.
- Effective and continuous learning improves professional practice.
- The views and experiences of children, young people and their families are at the centre of service design and influence development and strategic thinking.

Actions taken by the Local Authority since the Ofsted Inspection

1.16 Following the initial Ofsted report immediate actions were taken:

- Implemented the new senior leadership structure agreed by General Functions Committee in March 2017, with a key focus on practice leadership
- Secured investment to manage demand and improve quality (£5.7m)
- Changed the line management arrangements for MASH, DAT and Intervention and Planning Services to ensure consistency in decision making and with a future aim of reducing points of transition for families thereby promoting a seamless system of child protection
- Developed a robust framework for multi-agency working, information sharing and accountability in the MASH by introducing daily MASH meetings and a new framework for multi-agency audits

- Introduced robust checks and balances to the quality and frequency of management oversight at the front door of children's services
- Implemented a new assessment pro-forma that promotes robust child focused assessment and analysis of information gathered
- Developed a new chronology template and delivered lunchtime workshops to staff on chronologies
- Completed appraisal targets with all front line managers and staff that set out clear expectations for practice quality and management oversight which is congruent with the DfE child and family social work knowledge and skills framework
- Permanently employed a strategic lead for children at risk of CSE/Missing to ensure robust monitoring, strategic multi-agency and inter-agency interface and practice leadership
- Audited and improved reporting, tracking and monitoring systems of children missing from care
- Improved tracking and case management of children subject to PLO to ensure robust and timely decision making
- The fostering workflow has been reviewed and configured on LCS to improve recording
- Developed and implemented a refreshed 16/17 year old homelessness protocol
- Developed a framework for a robust quality assurance programme of activities that has a clear and purposeful link to the workforce development programme, identified areas for improvement and performance data
- Live audit activity (observations of practice) have started
- Provided a Corporate parenting report on the impact of the care leaver pledge to Corporate Parenting Advisory Panel (CPAP)

Ofsted monitoring and re-inspection of local authority children's services judged inadequate (Appendix 2)

- 1.17 Ofsted will undertake a series of activities including an action planning visit, a programme of quarterly monitoring visits and a re-inspection once the period of monitoring has ended.
- 1.18 Ofsted will visit the local authority for an action planning meeting. This will happen between 25 and 35 days after the local authority receive the report. This meeting will cover the inspection judgements and recommendations, including implications for statutory partners, and review the draft post-inspection action plan.
- 1.19 The local authority has to submit a 'written statement of action' (the action plan) to the Secretary of State and Her Majesty's Chief Inspector (HMCI) within 70 working days of the receipt of the inspection report (16 October 2017). Ofsted will review the action plan and confirm to the Directors of Children's Services whether the action plan reflects the inspection findings and recommendations.

Monitoring of inadequate local authorities

- 1.20 Ofsted will carry out quarterly monitoring visits which will evaluate the progress the local authority has made against the recommendations in the inspection report.

Re-inspection of inadequate local authorities

- 1.21 Ofsted decides whether to undertake a post-monitoring single inspection or a full single inspection. This decision is based upon information and performance data gathered during monitoring visits, the local authority's evaluation of its improvement journey and the view of the DfE. However local authorities found to be inadequate across all or most areas are likely to receive a full repeat single inspection.
- 1.22 Ofsted will usually re-inspect a local authority judged inadequate at its last inspection within two years of it submitting its action plan.
- 1.23 If the re-inspection determines that the local authority remains inadequate, the monitoring process will start again. Alternatively, the Secretary of State may appoint a Children's Services Commissioner to review whether services should be removed from council control.
- 1.24 Where Ofsted returns a "requires improvement" judgement on a previously inadequate council, central government will continue to provide supervision and support for 12 months to ensure that improvements are sustained.

The Department for Education's intervention policy (Appendix 3, pages 53 - 57)

- 1.25 The authority is subject to intervention by the Department of Education (DfE) until services are improved.
- 1.26 Whenever Ofsted finds children's social care services to be inadequate, the DfE will provide expert scrutiny to diagnose problems and support the council to produce an effective improvement plan. A children's commissioner will be appointed to Barnet by the DfE for an initial three-months to give advice to ministers about the council's progress on improvements.
- 1.27 The DfE will review the local authority's progress towards improvement every six months.

2. REASONS FOR RECOMMENDATIONS

- 2.1 Authorisation to complete and submit the draft Improvement Action Plan is recommended as the local authority is required to submit a 'written statement of action' to the Secretary of State and HMCI (to be submitted by 16 October 2017).
- 2.2 A standing item at CELS on the progress of implementing the draft Improvement Action Plan is recommended to enhance scrutiny by elected members in order to

support and challenge continuous improvement. This is recommended so that the local authority is effective as the lead agency for the protection and care of children and young people and as a corporate parent.

3. ALTERNATIVE OPTIONS CONSIDERED AND NOT RECOMMENDED

- 3.1 The completion, submission and coordinated implementation of the draft Improvement Action Plan are integral to driving the continuation of the Family Services' journey to ensure improved outcomes for children and families. The alternative option of maintaining the status quo will not make the desired improvements or improve outcomes at the pace required.

4. POST DECISION IMPLEMENTATION

- 4.1 The draft Improvement Action Plan following consultation, will be submitted to the Secretary of State and HMCI.
- 4.2 The delivery of the draft Improvement Action Plan will continue to be overseen by the Family Service's Social Work Improvement Board, chaired by the Chief Executive. There will also be monthly updates and reporting. Officers responsible for delivery will provide monthly updates to senior managers and the Improvement Team. There will be regular updates to members through both CELS and the Corporate Parenting Advisory Panel.
- 4.3 A framework to measure the progress of the action plan is being developed. This will consist of a set of performance indicators which will provide an overview of practice across the service and a quality assurance framework to ensure improvements in practice have been implemented and embedded.

5. IMPLICATIONS OF DECISION

Corporate Priorities and Performance

- 5.1 The implementation of the action plan and continuation of the improvement programme is a key mechanism through which Family Services will deliver the Family Friendly Barnet vision.
- 5.2 This supports the following Council's corporate priorities as expressed through the Corporate Plan for 2015-20 which sets out the vision and strategy for the next five years based on the core principles of fairness, responsibility and opportunity, to make sure Barnet is a place;
- Of opportunity, where people can further their quality of life
 - Where people are helped to help themselves, recognising that prevention is better than cure
- 5.3 Family Services are working with partners to make Barnet the most family friendly borough to ensure a great start in life for every child and prepare young people well

for adulthood. Building resilience through purposeful social work practice, enabled by appropriate tools and a high quality workforce so that families are able to help themselves and prevent problems from escalating.

Resources (Finance & Value for Money, Procurement, Staffing, IT, Property, Sustainability)

5.4 A Business Planning 2017 – 2020 report which was presented to Policy and Resources committee on 27 June 2017 approved an additional £5.7 million for Family Services in 2017/18. This additional budget includes investment to improve practice as well as allocations for costs of inflation and growth pressures.

Demand	Age group	2017/18
		£'000
Demographics – placements	0-17	733
Health Visitors - links to MASH, Signs of Safety, Child Protection	0 - 5	270
UASCs – placements	0-25	260
Special Guardianship Orders	0-17	173
Children and Social Work Bill - staffing in Leaving Care	0-25	125
Disability - staffing and placement costs from adults	0-25	1556
Improvement		
Increase in gang activity and serious youth crime	0-17	117
Youth homelessness	0 -17	100
REACH service	0-17	510
CIC caseload - lifestory, missing (1TM, 3 SW)	0-17	190
Practice Improvement and Quality staffing		354
Business Support in Performance Hubs		183
Inspection planning		120
MASH Management		90
MASH Social Work capacity		129
Others		
Pay inflation		195
Contract inflation		400
Benefits package		200
TOTAL		£5,705

Social Value

- 5.5 The Public Services (Social Value) Act 2013 requires people who commission public services to think about how they can also secure wider social, economic and environmental benefits. Before commencing a procurement process, commissioners should think about whether the services they are going to buy, or the way they are going to buy them, could secure these benefits for their area or stakeholders.

Legal and Constitutional References

- 5.6 Local authorities have specific duties in respect of children under various legislation including the Children Act 1989 and Children Act 2004.. They have a general duty to safeguard and promote the welfare of children in need in their area and, provided that this is consistent with the child's safety and welfare, to promote the upbringing of such children by their families by providing services appropriate to the child's needs. They also have a duty to promote the upbringing of such children by their families, by providing services appropriate to the child's needs, provided this is consistent with the child's safety and welfare. They should do this in partnership with parents, in a way that is sensitive to the child's race, religion, culture and language and that, where practicable, takes account of the child's wishes and feelings.
- 5.7 Part 8 of the Education and Inspections Act 2006 provides the statutory framework for Ofsted inspections. Section 136 and 137 provide the power for Ofsted to inspect on behalf of the Secretary of State and requires the Chief Inspector to produce a report following such an inspection. Following receipt of the report, the local authority must prepare a written statement of (1) action which they propose to take in light of the report and (2) the period within which they propose to take that action.
- 5.8 Responsibility for Functions, Annex A, in the council's constitution states that the Children, Education, Libraries and Safeguarding Committee has the responsibility for powers, duties and functions relating to Children's Services. In addition to this, the committee has responsibility for overseeing the support for young people in care and enhancing the council's corporate parenting role.

Risk Management

- 5.9 The nature of services provided to children and families by Family Services manage significant levels of risk. An inappropriate response or poor decision-making around a case could lead to a significant children's safeguarding incident resulting in significant harm. Good quality early intervention and social care services reduce the likelihood of children suffering harm and increase the likelihood of children developing into successful adults and achieving and succeeding. The implementation of the draft Improvement Action Plan based on inspection findings and recommendations reduce this risk and drive forward improvements towards good quality services.

Equalities and Diversity

- 5.10 The 2010 Equality Act outlines the provisions of the Public Sector Equalities Duty which requires Public Bodies **to have due regard** to the need to:
- eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Equality Act 2010
 - advance equality of opportunity between people from different groups
 - foster good relations between people from different groups
- 5.11 The broad purpose of this duty is to integrate considerations of equality into day business and keep them under review in decision making, the design of policies and the delivery of services
- 5.12 Equalities and diversity considerations are a key element of social work practice. It is imperative that help and protection services for children and young are sensitive and responsive to age, disability, ethnicity, faith or belief, gender, gender, identity, language, race and sexual orientation. Barnet has a diverse population of children and young people. Children and young people from minority ethnic groups account for 52%, compared with 30% in the country as a whole. The proportion of children and young people with English as an additional language across primary schools is 44% (the national average is 18%).
- 5.13 Social workers recording and planning in relation to inequalities and disadvantage is inconsistent and therefore the action plan addresses the additional work which needs to be done to ensure that children's diversity and identity needs are met.

Consultation and Engagement

- 5.14 Consultation and engagement with children and young people is central to social work practice and service improvement. Barnet has a range of mechanisms to engage and consult with children, young and their families. This includes youth forums such as Barnet Youth Board and Youth Assembly; young commissioners to co-design services and Children in Care Council to improve the support children in care receive.
- 5.15 The draft Improvement Action Plan looks to improve children's participation to ensure that all decisions and planning that affects them is influenced by their wishes and feelings. The plan also includes actions to strengthen how the views and experiences of children, young people and their families influence service design. This feedback will also help monitor the impact of improvement activity.
- 5.16 There will also be engagement, consultation and communication with staff and partner agencies about the inspection result and draft Improvement Action Plan.
- 5.17 The draft Improvement Action Plan will need to be delivered with partner agencies to ensure action is undertaken in a joined up effective way.

Insight

- 5.18 A large amount of insight was collected and used during the Ofsted Inspection. This insight data has been used to develop the action plan. Insight data will continue to be regularly collected and used in monitoring the progress and impact of the action plan and shaping ongoing improvement activity.

6. BACKGROUND PAPERS

- 6.1 Item 8, Policy and Resources Committee, 27 June 2017:
<http://barnet.moderngov.co.uk/ieListDocuments.aspx?CId=692&MId=8736&Ver=4>
- 6.2 Item 10, Children, Education, Libraries & Safeguarding Committee, 12 July 2016
<http://barnet.moderngov.co.uk/ieListDocuments.aspx?CId=697&MId=8685&Ver=4>
- 6.3 Item 11, Children, Education, Libraries & Safeguarding Committee, 21 September 2015:
<http://barnet.moderngov.co.uk/ieListDocuments.aspx?CId=697&MId=8258&Ver=4>