Executive summary

This report details the findings and recommendations of a review conducted by a task and finish group formed from members of Buckinghamshire County Council.

The review was commissioned to examine the issues of safeguarding for vulnerable children and adults within the collective client transport function. This subject was suggested to the Overview and Scrutiny Commissioning Committee by a co-opted member and it was agreed that there would be a benefit in examining the subject in more detail.

The aims of the review were:
- To gain reassurance that effective systems are in place in the safeguarding of vulnerable children and adults when using transport commissioned by Buckinghamshire County Council (BCC)
- To promote areas of safeguarding good practice currently in evidence
- To highlight any gaps in current procedures and systems and identify areas that may need further consideration

Members’ overarching ambition for this review is that, in line with the County Council corporate plan priorities, it can help to improve the lives of vulnerable and disadvantaged people and work more closely with families to help shape service improvement.

Written and verbal evidence was presented at two meetings held on 12th January and 9th February 2010. The time limited select committee style approach to scrutiny has not been widely used in recent reviews and presents certain challenges. This resulted in a significant proportion of the enquiry focussing on the transportation needs of vulnerable and special educational needs children, although members received a comprehensive overview on all client transport provision.

Consequently it is important that this report acknowledges that its findings are based on initial investigations into a complex and sensitive subject and is based on evidence from small sample sizes. Further work may need to be undertaken by the service to test whether the findings hold true for a larger client group.
Whilst members were clear that from the evidence presented, recurrent themes surfaced that are worthy of further consideration, they agree that there have been encouraging improvements to service delivery since the contract was awarded to Amey such as the implementation of nationally accredited training programmes. The recommendations from this review are therefore designed to build on this progress.

The recommendations emerging from the evidence gathering are as follows:

1. **Management and monitoring of contractors and subcontractors**
   Provide greater clarity on the process of subcontracting and the quality assurance controls that are in place throughout the supply chain, demonstrating that all at the bottom of the chain are adhering to the contract.

2. **Procurement of SEN routes**
   Review how passengers are grouped together to ensure journey times are minimised and groups are compatible.

3. **Training**
   Conduct an analysis of current training and monitoring procedures at all levels of the supply chain to quantify gaps in delivery. An action plan is provided with a specific focus on improving communication skills, knowledge of disabilities and behavioural disorders.

4. **Risk Assessment**
   Demonstrate that the risk assessment process fully reflects the requirements of people with special educational needs and these are communicated through the supply chain down to the individual driver and passenger assistant.

5. **Service user involvement**
   Establish regular forums to ensure the voice of service users feeds into the shaping of future service provision.

6. **Communication**
   Develop a more joined up and transparent approach to ensure that all parties are aware of current protocol and procedures with particular reference to complaints, emergency situations and last minute changes to service provision.

7. **Data protection**
   Clarify to parents of service users with special educational needs children the procedure for gathering, storing and cascading personal and sensitive data to third parties.

The review panel requests that progress on the implementation of the agreed recommendations is reported back to the Overview and Scrutiny Commissioning committee in October 2010.
Introduction

1. The Client Transport Service provides Home to School and College Transport, transport for Safeguarded Children and Adult Social Care clients.

2. Every year approximately 14,660 passengers use mainstream school transport, 1,600 passengers special needs transport, and there are between 250 and 400 safeguarded pupils transported every year although recent projections indicate this number is nearer 400 because of the impact of Baby 'P' on child protection. Adult Social Care commissions approximately 350 journeys per day for service users.

3. Transport for Buckinghamshire is responsible for the Client Transport budget and the contract is managed for BCC by the Client Transport Compliance Manager.

4. Amey plc were awarded the Client Transport contract in June 2008 for a period of five years, with an option to extend for a further five years. BCC may approach the Contractor if it wishes to do so before the end of the Initial Term and the Parties shall seek to agree the terms of any extension. The clauses in the Agreement will apply throughout the extended period unless otherwise stated.

5. Amey plc act as Managing Agents and manage the service on behalf of the Council. The budget sits with the Council and all transport contracts are let by Amey on behalf of the authority. Amey are contracted to provide these services, for which they are paid a management fee. Amey are incentivised to produce greater efficiency and drive down the cost of provision. If this is achieved they are awarded an agreed percentage of the savings. In the financial year of 2008/09 a saving of £700,000 was expected and £1m in 2009/10 giving at total of £1.6m. 24 staff were transferred under TUPE to Amey for whom Bucks County Council pay for the value of the TUPE staff. Children and Young People's Services and Adults and Family Well Being Service set the policies and determine eligibility to transport for their service users. The Client Service Areas also share budgetary responsibility and must fund any policy changes or increase in their transport requirements.

6. In managing the service Amey are responsible for the following key areas:

- Procuring transport services for ‘Mainstream’ pupils; pupils with special educational needs (SEN); ‘safeguarded’ children; eligible adults in Adult Social Care
- Route planning and procurement of transport contracts
- Allocating passengers to appropriate routes
- Transport related Risk Assessments
- Issuing bus passes to mainstream pupils
- Ensuring drivers and passenger assistants are CRB vetted through BCC procedures
- Training of contractors, drivers and passenger assistants
- Monitoring of contracts
- Dealing with complaints and queries regarding transport services. The Amey Complaints procedure has been brought into line with the County Council. Stage 1 and most stage 2 complaints are dealt with by Amey and stage 3 by the County Council.
- Provision of information and information about policy to stakeholders on home to school transport and related matters. This includes parents, carers, establishments BCC staff and elected members, staff and elected members of local and neighbouring district councils, members of the supply chain, and members of local community.
- Advising, undertaking activities and reporting monthly on the following Key Performance Indicators (KPIs):
  - PS1 Target cost
  - PS2 Punctuality of transport
  - PS3 Contract compliance by sub-contractors
  - PS4 Monitoring of contracts and transport contractors
  - PS5 Customer satisfaction
  - PS6 Training of drivers and passenger assistants
  - PS7 Reduction of Carbon Emissions
7. The governance of the Client Transport Contract occurs at five levels:

- **Client Transport Contract Manager's meeting**
  BCC Client Transport Compliance Manager and Amey Client Transport Contract Manager meet regularly to review and discuss any issues.

- **Monitoring meetings with Service Areas**
  BCC Client Transport Compliance Manager meets monthly with Service Areas/Amey to review contract performance, financial monitoring, and passenger numbers and identify issues to be raised at TRANstat.

- **TRANstat plus**
  Transportation’s monthly performance monitoring board receives and challenges performance, financial and risk reports from Amey. Membership includes Head of Service, Amey management and Cabinet member.

- **Client Transport Partnering Board**
  Meets quarterly, with four representatives each from BCC and Amey; chaired by BCC Client Transport Contract Manager. Receives contract performance and financial reports based on monthly reports to TRANstat; safeguarding and other matters relating to the terms of reference.

- **Client Transport Management Board**
  Meets quarterly chaired by Cabinet Member for Transportation. Maximum of two representatives from each Service Area, plus BCC Client Transport Contract Manager and representative from Amey. Receives and reviews quarterly report on the financial performance of the contract. Agrees the Terms & Conditions of the Contract, Budgets, safeguarding issues and other matters relating to the terms of reference.

8. Liaison between Transportation, Amey, Children’s & Young People's Services and Adult & Family Wellbeing is key to the success of the contract. This is a prime responsibility of the Client Transport Compliance Manager, who ensures that this occurs through the formal governance structure and informally as required.

**Background**

9. The newly formed Overview and Scrutiny Commissioning Committee nominated one of its members as Chairman and recruited members to the review group from the wider membership of the County Council. The membership of the task group included Wendy Mallen (Chairman), David Schofield, Carl Etholen, Jenny Puddefoot, Mary Baldwin, Dev Dhillon, Bruce Allen and Michael Moore (co-opted member representing Roman Catholic
There was a requirement for substitutes to be present during the course of the review. Substitute members were Trevor Egleton, Noel Brown and Mike Appleyard.

10. In its meetings members interviewed officers from Amey who hold responsibility for delivering the contract. Buckinghamshire County Council officers gave evidence on contract monitoring, client transport policy for children and adults, vetting and barring and CRB procedures and allegations procedures.

11. Members were keen that the review remained true to scrutiny principles and reflected the public voice. Service users representing parents groups, those with disabilities and some schools provided written and verbal evidence. Some groups had conducted their own surveys and these were submitted to the review panel. Recognising the sensitivity of some of the evidence provided and the need to protect individual identity, it was necessary to conduct some parts of the review meeting in private rather than in public, which is usual scrutiny procedure.

Findings

The broad themes that were reflected in the evidence gathering stage are as follows:

1. Management and monitoring of contractors and subcontractors

12. Members heard that since the contract had moved to Amey the numbers of subcontractors used had significantly reduced from over 240 to approximately 50. Contracts have been re-tendered in two tranches for the north and south of the county. Special needs school transport contracts have also been retendered and this process has benefited from additional procurement and logistics resources from within Amey Logistics. The review panel heard that it is also possible for sub-contractors to further sub-contract. Members asked for more information about the controls in place to further understand that any additional levels of subcontractors complied with the terms of the contract.

13. The review panel welcomed the initiation of routine monitoring of the supply chain. This includes twice yearly checks on depots and on-site checks with an emphasis on licensing, CRB, vehicles and insurance. There were 1491 checks carried out by Amey in the first 9 months of the new contract. This was a significant increase on previous years.

14. Amey introduced a ‘Penalty Points’ system for non-compliance in July 2009 that had been piloted before July 2009 but without implementing sanctions. Contractors receive a warning and a fine and if they reach 20 points they could lose their route. An enforcement team conduct spot checks on contractors and subcontractors to ensure compliance with their contractual obligations.
15. Witnesses commented that in general concerns about non-compliance were handled well by Amey but believed this could be improved if there was more capacity within the enforcement team.

**Recommendation 1**
Provide greater clarity on the process of subcontracting and the quality assurance controls that are in place throughout the supply chain, demonstrating that all at the bottom of the chain are adhering to the contract.

2. **Procurement of SEN routes**

16. Once the commencement of the contract routes have been procured in ‘bundles’ using industry standard score card procedures. Contracts have been grouped in ‘bundles’, usually based on schools. This has driven down prices and reduced the number of principal contractors.

17. It was reported by service users that another impact of the ‘bundling’ system is to lengthen journey times for some children. There was specific concern about the impact this has for SEN children. Over half of the responses to a survey from the autistic society in South Bucks revealed that a significant proportion of children were travelling over the county guideline limit of 45 minutes.

> “the travelling time is too long for our son. Children that are compatible should be travelling together”

18. A head master commented that it would be helpful for schools to be able to contribute to the planning process with detailed local information

> ‘we have concern about the central administration having appropriate intelligence about local areas and working with Heads in making effective safeguarding decisions about pupil travel in periods of disruption’

N.B Recommendation 5 encourages the inclusion of stakeholder groups to help shape services.

**Recommendation 2**
Review how passengers are grouped together to ensure journey times are minimised and groups are compatible

3. **Training**

19. Training is now a contractual requirement for all suppliers and subcontractors. Members learned that the previous PATS (Passenger Assistant Training) has been supplemented by additional training on child and adult protection and includes ‘Team Teach’ which focuses on behaviour management and particularly anger management. This is delivered by specialist Amey staff who are nationally accredited and subject to external verification.

20. Safeguarding training is provided to staff contractors, drivers and passenger assistants including all approved subcontractors with modules including child
protection and behaviour management. The prime contractors are now required to fund this training and are answerable for sub-contractors. Amey provide training to main contractors regarding their responsibilities in managing subcontractors. Approximately 129 people have undergone Team Teach; and around 160 persons have gone through PATS during this year to date from a database of drivers and passenger assistants of around 4000.

21. Figures provided by Amey showed an encouraging decrease in the percentage of allegations. It was reported that this could partly be attributed to the additional investment in training programmes. Evidence from a special school praised the training sessions they had witnessed and was impressed with the quality of the trainers.

22. However whilst members were encouraged by the progress to date with training, concerns remained around whether more could be done, particularly around communication and language skills and knowledge of disabilities and behavioural disorders. Members also enquired whether the training effectively reached all levels of the supply chain, particularly where a sub-contractor had also sub-contracted.

23. The difficulty in conducting sufficient training when there is a continual influx of new staff was discussed. A passenger assistant (PA) told the review panel that the retendering process had led to a ‘churn’ of staff. In his area he was the only PA that has been doing the job for more than a year with the result that not all drivers and PAs receive training as soon as they should.

24. The Local Authority Designated officer (LADO) who deals with allegations, encouraged the use of Team Teach, but did not believe it went far enough. She told members that special skills are required to deal with children who often display very challenging behaviours. She told members in her experience drivers generally do a good job but expectations of drivers and PAs are very high and need to be clarified to all parties, with a clearer understanding of what they should know. The officer distributed a recently produced leaflet entitled Child Protection Advice which is distributed to contractors. The contractor will use this as part of his employees training.

25. The review heard that adequate use of language was addressed as part of the training programme but there was agreement that there are widely varying expectations of what represents adequate language ability. Many examples were provided to members relating to the inability of drivers and particularly passenger assistants in communicating effectively to the children in their care. The LADO gave an example of recently interviewing a passenger assistant who could not speak any English at all. Members agreed that there needs to be a better test of communications skills.

‘drivers should be able to converse in good English simply to be able to reassure children and placate them in the case of an emergency.’

26. It was agreed that it is challenging to ensure that all staff know enough detail about specific behavioural conditions and disabilities. Substantial information of a sensitive and moving nature was submitted to the review that suggested
more could be built into the training to inform staff. Parents would be willing to contribute to this process.

‘I am concerned that the taxi staff and escorts are not trained in dealing with my child’s specific needs or how to deal with several children at once with differing conditions – no-one talks to parents or involves them in the training and yet we are the experts!’

‘When I asked the new driver if they had had any training about autism they said no but that they had watched Rain Man!’

27. Members were impressed by the adult social care transport policy document; in particular the approach that is asked of drivers and PAs to their passengers.

‘Drivers and passenger assistants will greet all ASC clients in a welcoming manner, be friendly, courteous and helpful and will treat all ASC clients with respect and dignity and be sensitive to their confidentiality and cultural needs’

28. The review panel believed this was an example of good practice that could be built into future training.

Recommendation 3
Conduct an analysis of current training and monitoring procedures at all levels of the supply chain to quantify gaps in delivery. An action plan is provided with a specific focus on improving communication skills, knowledge of disabilities and behavioural disorders.

4. Risk Assessment

29. Members were informed that since taking on the contract Amey ensures that risk assessment processes are now documented and criteria for identification are in place. Guidance is provided to the supply chain on specific issues. Checks on specialist equipment and inventory have also been introduced since the commencement of the contract.

30. The focus of concerns about risk assessment came from parents with children with special needs. Feedback from a survey by the South Bucks branch of the national autistic society indicated that from 45 questionnaires received 20 respondents had not been asked to complete a health and safety questionnaire. 10 had completed this alone 9 in the presence of the taxi driver and 4 with a county representative.

‘someone from Bucks CC came out to my home and completed an assessment however there has been some evidence that this didn't filter through to the taxi company’

31. Members heard that SEN risk assessment was only reviewed annually. Due to changing circumstances and if feasible bearing in mind financial constraints, termly reviews would be better and could result in fewer complaints and allegations.
32. The principle of ‘bundling’ groups of children whilst understandable is not always successful. This is particularly true for SEN children. Parents’ groups were keen to ensure that risk assessments are conducted for groups of passengers and not just one individual. There was concern expressed from service users, a passenger assistant and parents that when changes were made to transport arrangements, particularly increasing the number of children in a taxi, there was not a reassessment that involved all appropriate parties ‘at no time had the school been consulted on X’s individual needs for transport arrangements, despite another child being added to the route’

Recommendation 4
Demonstrate that the risk assessment process fully reflects the requirements of people with special educational needs and these are communicated through the supply chain down to the individual driver and passenger assistant.

5. Service user involvement

33. Members heard that in the last twenty months Amey have worked hard to build link with agencies such as district council licensing officers and schools but acknowledge that there is further scope to work more closely with stakeholders and are planning to address this.

34. The governance structure outlined in the introduction to this report does not currently reflect the voice of the service user. Members heard that parents were keen to re-instate a ‘transport focus group’ that could feed into the current governance structure. The suggestion of regular forums with stakeholders to provide a public perspective would be welcomed in particular when considerations to policy and protocol are discussed. ‘parents should be listened to rather than viewed as continual complainers! We after all know our children better than anyone else’

35. There is a willingness from stakeholders and service users to become more involved in having an influence on shaping future service delivery. Contributors from parents groups, disability groups, and members of the public informed the review panel that both the training programmes and the assessment process could be enhanced to ensure that the service providers had a fuller picture and knowledge of the service users’ needs and requirements.

36. With particular reference to the statementing process a representative from a governing body of a special school advised that improvements could be made, particularly earlier engagement, to flag up potential transport difficulties before finalising the transport arrangements. These could include cultural or racial issues, sexual interference or harassment issues particularly with significant age differences and locality issues where families are feuding and social care issues.

Recommendation 5
Establish regular forums to ensure the voice of service users feeds into the shaping of future service provision.
6. Communication

37. One of the main areas of feedback regarding communication related to changes to drivers and PAs that were often made at the last moment. Members fully understand that these situations are bound to arise due to illness and other events. However the panel received numerous examples of incidences where changes to drivers and passenger assistants were made at the last moment and not communicated to school and parents. This can be particularly upsetting for parents with SEN children who need to prepare their children for their journey time.

‘Communication overall is poor there seems to be no understanding at all about my child’s condition and the importance of punctuality and informing about changes so parents can prepare their children’

38. Feedback from Adult Services also endorsed the fact that when changes to drivers were made there was inconsistency in the flow of information with day centres often not knowing the current situation.

‘it is helpful if passenger assistants and drivers are consistent and we should be pre-warned of any changes’

‘It seems there is poor communication between the central office and the drivers and between the driver and escort and the families’

39. The complaints procedure was another area where the evidence submitted suggests there needs to be more clarity for service users. Initial complaints are logged into the Routewise system. Members heard that letters dealing with complaints did not have adequate contact details, such as telephone numbers and a named officer, making it difficult to resolve a situation quickly. Additionally there was a frustration about lack of feedback and the time delay service users experienced after having logged an initial complaint.

‘there must be someone at County to deal with our complaints and not have to be passed around – these children are vulnerable all this red tape is taking advantage of their individual lack of voice’

40. The LADO’s report commented that there are often delays in completing investigations. The early phase proceeds smoothly but there has been delays in completing management reviews by Amey client transport staff. This capacity issue has left individuals for lengthy periods with no clear decisions about the allegations made against them which is not satisfactory.

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<th>Recommendation 6</th>
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<td>Develop a joined up and transparent approach to ensure that all stakeholders are aware of protocol, procedures and current information with particular reference to complaints, emergency situations and last minute changes to service provision.</td>
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7. Data protection

41. Concerns were expressed by a service user that given the personal significance of the information requested to compile a risk assessment by the
contractor, it is critical that data is cascaded to third parties appropriately and that procedures reflect national standards.

42. Written evidence noted that parents were not advised of how such sensitive data was stored or passed on to others, nor were parents required to sign a document to confirm that data held in the system can be stored or is validated as correct. There remained a lack of clarity about the process.

43. The contractor’s contract is clear that information should not be divulged to third parties but members remained unclear of the data control procedures and how they are regulated. The managing agent was asked to clarify the procedures currently in place and report back to the committee.

**Recommendation 7**
Clarify to service users with special educational needs children, the procedure for gathering, storing and cascading personal and sensitive data to third parties.

**Conclusions**

44. The group acknowledges that the provision of client transport is complex and that this review has focussed largely on the needs of vulnerable children, their families and carers. However a service that is better informed by client-need will result in positive outcomes for the most vulnerable adults and children in Buckinghamshire.

45. Members are encouraged with the progress made since the commencement of the contract, specifically in the reduction in numbers of main contractors and the introduction of new accredited training programmes. However the review highlights the concerns that there are several levels of subcontractors and the ability to manage and monitor them. The review panel is keen to build on progress and hopes that the recommendations in the report are used to inform the shaping of service provision to deliver positive outcomes for service users.

46. The time limited nature of the evidence gathering process has resulted in broad recommendations that encourage improved engagement with service users, strengthening communications through the supply chain and to stakeholders and further clarification of procedures and protocols.

**Next steps**

- Report to Overview and Scrutiny Commissioning Committee meeting March 23rd 2010
- Report to Buckinghamshire County Council Cabinet April 12th 2010
- Progress on agreed recommendations to be reported back to Overview and Scrutiny Commissioning committee October 2010.
Appendix 1

The Task and Finish group are grateful to a large number of contributors who have spent considerable time preparing for and attending meetings and providing written information to contribute to the evidence gathering process. Members of the review would like to extend their thanks to everyone involved in participating in this piece of work.

On behalf of Amey plc:

Phil Dyson – Transport operations manager
Colin Edwards – Commercial manager
Gordon McKendry – Compliance and quality manager
Jim Waddington – Contract manager

On behalf of Buckinghamshire County Council:

Stephen Bagnall – Divisional Manager Joint Commissioning Children’s Services
Chris Daltry – Human Resources Manager
Bridget Day – Local Authority Designated Officer Safeguarding children’s services
Neil Gibson Strategic Director Communities and Built Environment
Helen Halfpenny - Client Transport Compliance Manager
Sarah Harris – Local Authority Designated Officer Safeguarding children’s services
Caroline Penfold – Adult Social Care
Jim Stevens Head of Transportation

Representing parents groups and schools:

Geoff Allen
Zana Bayley - Parent partnership group
Paul Monk
National Autistic Society South Bucks
Penni Thorne – Bucks Vision
Andrew Walker

Written evidence was received from special schools, and members of the public
Appendix 2 Scoping paper

N.B please note that since the publication of the scoping document the timetable has slipped due to the cancellation of an evidence gathering meeting adverse weather conditions in January 2010

<table>
<thead>
<tr>
<th>Subject of the Review</th>
<th>Safeguarding Practices within Client Transport</th>
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<tbody>
<tr>
<td>Chairman</td>
<td>Wendy Mallen</td>
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<tr>
<td>Review members, including co-optees</td>
<td>Carl Etholen, Michael Moore, David Schofield, Jenny Puddefoot Mary Baldwin, Dev Dhillon</td>
</tr>
<tr>
<td>Officer contact</td>
<td>Angela Macpherson 01296 382876</td>
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<tr>
<td>Purpose of the Review (Reasons for undertaking the review, including where the ideas have come from)</td>
<td>To examine the issues of safeguarding within Client Transport Home to School which includes mainstream and Special Educational Needs, Children’s ‘Safeguarding and Adult Social Care transport, which has been outsourced to Amey plc.</td>
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<tr>
<td>Anticipated outcome(s)</td>
<td>To promote areas of safeguarding good practice which currently exist in the transport of vulnerable children and adults To highlight any gaps in the systems and identify areas which may need further consideration</td>
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<td>What is the potential impact of the review on</td>
<td>Reassurance that effective systems are in place in the safeguarding of vulnerable children and adults Sharing of best practice across the organisation and with partners</td>
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<tr>
<td>• Residents</td>
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<td>• Equality issues, e.g. access to services, vulnerable groups</td>
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<td>• Health inequalities</td>
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<td>• Adding value to the organisation</td>
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<td>• Partners</td>
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<tr>
<td>Link to Council Corporate Plan priority</td>
<td>Work with families to help them to reach their potential Help to improve the lives of vulnerable and disadvantaged people</td>
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<td>Key Issues for the review to address</td>
<td>Management of safeguarding processes, including Handling sensitive data, including how is information held, how is it cascaded, who is it passed to, measures in place for monitoring; CRB checks and new vetting and barring scheme Management of subcontracting including risk assessment Training of drivers in behaviour management</td>
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- Level of consultation with schools (SEN and mainstream SEN units) prior to any new transport arrangements being put in place
- Training of drivers in communications skills

### Methodology
- Select committee-style sessions – two sessions of questions, answers and discussion

### Press & Publicity
- Press releases before and after review
- Completed review placed on public website

### Key background papers
- Protocols for procurement and provision of client transport.
- Policies for assessment and eligibility.
- Appeals and complaints procedures
- Governance – client transport management board and client transport partnering board terms of reference

### Written evidence to be provided by:
- Service users, other authorities, schools,

### Oral evidence to be provided by:
- Amey PLC, Client Manager, members of the public, schools, drivers

### Resources required
- Officer time

### Project Timeline
- 10th November OSC Scoping to be discussed and agreed at OSC meeting
- Mid November membership of TFG finalised
- 7th December 2-4pm Task and Finish Group (TFG) planning meeting
- December – Witnesses to be briefed
- 12th January 11.30 – 12.30 pre-planning meeting
- 1-4 pm Select committee evidence gathering meeting
- 13th January 9.30 – 12.30 and 1-4pm Select committee evidence gathering meeting and headline findings
- 19th January – verbal update – headline findings to OSC
- 23rd February draft report to OSC
- 19th April Report to Cabinet

### Reporting mechanism
- Report to Cabinet April 19th 2010