



Department for  
Digital, Culture,  
Media & Sport

**Helen Whately MP**  
Parliamentary Under Secretary of State  
for Arts, Heritage and Tourism  
4th Floor  
100 Parliament Street  
London SW1A 2BQ

[www.gov.uk/dcms](http://www.gov.uk/dcms)  
[enquiries@culture.gov.uk](mailto:enquiries@culture.gov.uk)

Councillor David Renard  
Leader  
Swindon Borough Council  
Civic Offices  
Euclid Street  
Swindon  
SN1 2JN

INT2019/11368/DC  
23 October 2019

### Local inquiry into library provision in Swindon

As you are aware, the Secretary of State has received correspondence complaining about the changes to the library service provision agreed at the Swindon Borough Council (SBC) Cabinet meeting of 7 December 2016.

The Secretary of State has considered whether to intervene by ordering an inquiry under the Public Libraries and Museums Act 1964 (the Act) into the changes in library provision in Swindon. For the reasons set out below, the Secretary of State is currently minded not to order such an inquiry to help determine whether the agreed changes will offer a comprehensive and efficient library service. This decision has not taken the provision of the community libraries into account.

However, before taking that decision the Secretary of State invites further representations as to her proposed decision from library users or other interested persons. Any such representations should be sent to the Ministerial Support Team, Department for Digital, Culture, Media and Sport, 100 Parliament Street, London, SW1A 2BQ or by email to [enquiries@culture.gov.uk](mailto:enquiries@culture.gov.uk) by **5.00pm on Monday 18 November 2019** and titled "**Swindon Library Services - Minded to Representations**".

### Background

SBC undertook two public consultations. The initial consultation ran for 10 weeks from 22 February to 29 April 2016 and the second for eight weeks from 1 August to 30 September 2016 on proposed changes to its statutory library service. Prior to these consultations the SBC statutory library service comprised of:

- 15 static libraries
- Mobile library service
- Home library provision

On 7 December 2016, SBC approved plans to restructure their library service resulting in a revised statutory library service provision. SBC decided to retain five static libraries, continue to offer the home library service, as well as developing an outreach service.

In addition, SBC decided to:

- cease to provide a statutory library service in the other ten libraries from 31 August 2017;
- allocate transitional funding of £500,000 to support the development of non-statutory, community led library services
- support expansion of volunteering including dedicated volunteer roles in libraries; and
- withdraw the mobile library service from 31 March 2017.

The transitional funding of £500,000 allocated by SBC was to support the development of non-statutory, community libraries. The funds were to support one-off costs, to meet equipment costs, IT investment, as well as the training and development of local organisations and volunteers. The community libraries benefit from some SBC staffing, book stock and residents are able to use their Swindon library card in these locations.

These community libraries represent a supplementary resource for residents of Swindon and the Secretary of State acknowledges the work of the Parish Councils and local organisations in taking over the running of these libraries. Although the community libraries are an additional local resource, as stated above, the Secretary of State has not taken them into account when considering to intervene by way of directing an inquiry.

SBC reduced the total number of staffed opening hours at its statutory service, but has also introduced a revised schedule of opening hours across the static statutory library network to include staffed hours and self-service hours. The result of this change has been a reduction in the total opening hours at the statutory libraries from 546 hours per week to 401.

Following SBC's decision of 7 December 2016 representations were received from three Swindon residents Helen James, Shirley Burnham, Deborah Butland and a resident from a village in neighbouring Oxfordshire, Sarah Church raising concerns with the proposed changes to the library services provided by SBC. They asked that the Secretary of State review the proposed changes to Swindon's library service to ensure that the Authority is meeting its statutory duty under the Act.

Section 10(1) of the Act provides:

*"If –*

- (a) a complaint is made to the Secretary of State that any library authority has failed to carry out duties relating to the public library service imposed on it by or under this Act; or*
- (b) the Secretary of State is of opinion that an investigation should be made as to whether any such failure by a library authority has occurred,*

*and, after causing a local enquiry to be held into the matter, the Secretary of State is satisfied that there has been such a failure by the library authority, he may make an order declaring it to be in default and directing it for the purpose of removing the default to carry out such of its duties, in such manner and within such time, as may be specified in the order."*

As you know, the Department is treating the correspondence referred to as a complaint under section 10(1)(a) of the Act. The Secretary of State must therefore decide whether it is necessary to order a local inquiry into the provision of library services in Swindon.

## Principles

What constitutes a comprehensive and efficient service is a question involving a significant element of judgement.

This judgement is, in the first instance, for the local authority to make. It has intimate knowledge of local conditions and needs and has direct democratic accountability to the local population. This is a significant factor. The Secretary of State's view is that decisions about local issues should ordinarily be taken by democratically-elected local representatives accountable to local voters.

The Secretary of State notes the views of Mr Justice Collins in the High Court case - *Draper v Lincolnshire County Council* [2014] EWHC 2388 (Admin): "*I should consider what is required to provide a comprehensive and efficient service within the meaning of s 7 of the 1964 Act. I can, I think, do no better than cite the following observations of Ouseley J in Bailey v London Borough of Brent* [2011] EWHC 2572 (Admin):

*"A comprehensive service cannot mean that every resident lives close to a library. This has never been the case. Comprehensive has therefore been taken to mean delivering a service that is accessible to all residents using reasonable means, including digital technologies. An efficient service must make the best use of the assets available in order to meet its core objectives and vision, recognising the constraints on council resources. Decisions about the Service must be embedded within a clear strategic framework which draws upon evidence about needs and aspirations across the diverse communities of the borough."*

The Secretary of State also notes that, as confirmed by the High Court in *R (Green) v Gloucestershire City Council* [2011] EWHC 2687 (Admin), "*the availability of resources is highly material to the question of what constitutes a comprehensive and efficient library service. The section 7 duty cannot be exempt or divorced from resource issues and cannot in law escape the reductions which have been rendered inevitable in the light of the financial crisis engulfing the country.*"

The duty of the Secretary of State is one of superintendence of the duty placed on local authorities. A wide range of approaches are open to a local authority when deciding how to provide a comprehensive and efficient library service. It is not the function of the Secretary of State to substitute her opinion for that of the democratically accountable local authority in how it discharges that primary duty. The question which the Secretary of State must decide in the exercise of the Secretary of State's duty under the Public Libraries and Museums Act 1964 is, whether, following the changes agreed by SBC at its meeting on 7 December 2016, there is any serious doubt or uncertainty as to whether the local authority is (or may cease to be) complying with its legal obligation to provide a comprehensive and efficient library service.

The Secretary of State seeks to promote and secure the proper discharge of the statutory duties on local authorities and has power to direct a local inquiry. That local inquiry can be commenced either on receipt of a complaint or of the Secretary of State's own motion. The Secretary of State's approach in deciding whether she is minded to intervene to direct an inquiry has been to ask herself whether, having regard to the duties on her and the local authority, there is good reason in all the circumstances for her to direct an inquiry at the present time.

In reaching the current view, the Secretary of State has given consideration to a number of factors. They include:

- Whether the Council appears to be acting in a careless or unreasonable way.
- Whether the decision is or may be outside the proper bounds of the Council's discretion, such as a capricious decision to stop serving a particularly vulnerable group in the local community.

- Whether the Council appears to have failed to consult affected individuals or to carry out significant research into the effects of its proposals.
- Whether the Council has failed to explain, analyse or properly justify its proposals.
- Whether the local proposals are likely to lead to a breach of national library policy.
- The advantages of local decision making by expert and democratically accountable local representatives.
- Whether there is any other good reason why an inquiry should be ordered.

### **Criticisms of the changes to the library service in Swindon**

The main criticisms raised in the representations are summarised below:

- a reduction in the number of statutory core libraries from 15 to five;
- cessation of SBC funding to the other 10 remaining libraries will result in multiple closures;
- concerns regarding the reduction in staffed hours at Highworth library and the impact upon users of this library of limited access to its services and activities;
- the consultations and final decision disregarded representations made and the final Council decision was predetermined

The representations therefore contend that SBC's agreed revised library service provision means that it does not satisfy the requirements under section 7 of the 1964 Act.

### **Proposed decision**

The criticisms raised in the representations have been carefully considered having regard to all of the factors listed on page 4. The Secretary of State has found the factors explored below to be of particular relevance to this matter.

#### **Issue - Reduction in Staffed Hours (Highworth Library) and its impact upon particular groups of residents**

The representations raised concerns about the reduction in staffed hours at Highworth library and its impact on certain groups of library users, including children, the elderly and those with a disability, as well as suggesting the library would be unable to deliver the same number of library activities.

#### **SBC Response**

SBC acknowledge that Highworth's staffed hours have decreased, but commented that overall opening hours at the library have increased. SBC also commented that while weekly staffed hours at Highworth have decreased, they have increased from the original proposal of 15 hours to 30 hours. SBC indicated this was in response to the consultation feedback and as a result of securing funding from the Parish Council to purchase additional SBC staffed time.

While acknowledging that staffed hours at Highworth library have reduced from 53 hours per week to 30 hours, SBC indicated that with the introduction of extended access the total weekly opening hours at the library has overall been extended. SBC confirmed that library users can physically access Highworth library 80 hours and 45 minutes per week.

SBC commented that staffed hours at their core libraries were determined based on the analysis of when library services were most accessed, local priorities, as well as efficient staffing requirements. SBC also confirmed that with the introduction of extended access, the five core libraries are now open for more days per week than prior to implementation of the agreed changes, and they also offer increased early morning and evening access.



SBC also indicated that Highworth library continues to deliver core library services and that there has been very little or no change in the number and range of activities taking place at this library.

#### Secretary of State's conclusion

The Secretary of State considers that SBC has responded to consultation feedback to secure more staffed hours at Highworth library, has introduced new technology to increase overall opening hours at the library enabling library users greater access to Highworth library over more days per week. The Secretary of State further notes that Highworth library continues to offer core library services and a range of activities.

The Secretary of State has had regard to the Public Sector Equality Duty obligations and is satisfied that SBC has acted reasonably and considers that any negative impacts on equality are proportionate.

#### Issue - Negative Impact on specific local residents

The criticisms also commented that SBC's Diversity Impact Assessment acknowledged that the proposed changes to the library service would negatively impact on the elderly, families with young children, disabled, people with mental health difficulties, people in rural areas who cannot travel to Swindon and economically disadvantaged people.

SBC confirmed they undertook a comprehensive Diversity Impact Assessment (DIA) to assess the impact of its libraries strategy and a number of impacts were identified. SBC also indicated that during the consultations specific targeted discussions were offered to representative bodies of key groups with protected characteristics under the Equality Act 2010, to understand any potential adverse impacts and to consider what measures could be considered to mitigate the impacts. The targeted groups included schools, pre-schools, older people's groups and various groups or individuals with characteristics of an equality protected group including; Sexual orientation, Gender identity, Race / Nationality, Older people, Religion and Disability.

SBC further commented that the libraries strategy was presented to four meetings of their Equalities Advisory Forum (EAF). In addition, prior to engagement and consultation, the EAF advised on access to and engagement with groups with protected equality characteristics and helped with evaluating feedback and identifying mitigations.

SBC indicated that the DIA identified that impacts were likely for older people, children and young people, disabled users including physical disability, mental ill-health, learning disability and visual impairment. The DIA also indicated there were also likely to be impacts to users on the basis of sex and race, and further acknowledged that other groups who may be particularly affected by the proposed strategy included users of a single library site (including the mobile library), those with a low Financial Economic Status, carers those communities who are facing high levels of deprivation in terms of education, skills and learning particularly around IT access.

SBC commented that they identified and implemented a range of mitigating measures to reduce the adverse impacts for groups impacted by the implementation of the strategy. However, SBC acknowledged that the mitigation measures would not eliminate all adverse impacts and the extent of the impact would depend on individual circumstances. SBC confirmed the key measures taken forward by the library service to mitigate adverse impact, included:

- maintaining stock provision and continuing to offer stock in a range of languages, that as far as possible reflect the languages of local residents. Stock is available in large print, audio, e-books, e-magazines and e-audio books. SBC confirmed they had invested more funds in e-books, e-audio and e-magazines and that issues of these have increased.

- making available access statements for each library that includes details of the facilities within the core library, nearest car parks and disabled parking. SBC confirmed that the access statements are to be updated to include links to bus company websites. Maps showing cycling and walking routes are available in all libraries. SBC commented that toilet facilities are not available during extended access hours, but confirmed that during the induction for the use of extended access library users are informed of the nearest toilet facilities.
- undertaking engagement sessions in all libraries during the transition phase to inform library users of how to access libraries in alternative ways. This also included providing leaflets with library opening hours and community library hours were published on the SBC website. Letters were sent to all mobile library users to inform them of alternative ways of accessing library services and a staff member went on all mobile routes to inform those library users of the changes.
- the Home Library Service was further promoted particularly to the users of the mobile library. This service was also promoted to all residential homes and sheltered accommodation schemes, who were also informed of the service changes. The delivery of the home library service transferred from RVS to SBC library service shortly after the agreed changes. There has been an increased demand in home library customers which means SBC need to recruit and train more volunteers.
- introduced technology to enable extended access to five core libraries outside of staffed hours. Prior to its introduction a Diversity Impact Assessment was undertaken. In addition, SBC also worked closely with equalities group and equalities access forum to help develop procedures and signage in the core libraries. Testing of the system, including the induction process, involved representatives from the Disability Network carer's forum and Age UK. As a result of feedback modifications were made to the application form and the delivery of the induction sessions. The induction checklist also provides detail to enable the library staff to identify whether a library user needs extra support at the induction sessions.

### Secretary of State's Conclusion

The Secretary of State considers that SBC was mindful of the changes to the library service provision and sought to engage with representative groups that could be affected by the changes. The Secretary of State further considers that SBC sought to mitigate the impact of the changes and made reasonable efforts to reduce the impact on groups of residents that may be more adversely impacted.

The Secretary of State considers that the Council thought carefully about the issues and sought to engage and respond to feedback. In summary, the Secretary of State does not consider the matters raised to be evidence that SBC is acting in a careless or unreasonable way in making the changes to its library service or that the changes may be outside the proper bounds of its discretion.

### Issue - SBC ignored representations and the final decision was predetermined

The criticisms raised suggested that SBC's decision disregarded many representations made to them regarding the impacts on the library service in general and specifically on education, social inclusion and health (including mental health).

The criticisms also suggest that the final decision was predetermined and the consultations were undertaken without any serious intention of reflecting the representations or to the question of the library budget.

SBC response

SBC indicated that the rationale for the changes and the financial challenge was set out clearly in their public engagement documents that were issued in February 2016 and then again in September 2016. SBC also indicated that their Libraries Strategy was based on information from the original engagement exercise, a needs assessment and a diversity impact assessment. SBC commented the strategy balanced the needs of library users and the need to save money, while also supporting their vision to be a place of fairness, opportunity and prosperity.

SBC further commented that the Library Strategy, detail of the engagement exercise in February 2016 and details of the consultation in September 2016, were available to residents in hard copy and also from their website. SBC further confirmed that the public engagement in February 2016 also included engagement sessions in all of its libraries, as well as other venues, while the consultation in September 2016 included a number of drop-in sessions and a public meeting to provide residents with the opportunity to discuss the proposals directly with councillors and Council officers.

SBC also confirmed that an independent analysis was undertaken of the responses to both engagement exercises. SBC further indicated that following the initial engagement exercise revisions were made and included in the second consultation and that further changes were made following the second consultation and included in the recommendations to their Cabinet for a final decision.

SBC commented that the significant change made to their proposals related to the proposed number of static libraries to comprise their statutory service. The initial proposal suggested one static core library (Central), enhanced by some targeted services and support to areas with the highest level of need, which was revised to four static libraries in the second consultation and revised further to five static libraries in the final proposals recommended to their Cabinet in December 2016.

SBC indicated that the agreed final proposals of a network of five core static libraries meant that 84% of the library users and 91% of Swindon's households lived within 2 miles of a core library. SBC commented that the initial proposal indicated all residents would be within 9 miles and 95% of residents within 4 miles of the one core library (Central) proposal. SBC also indicated that the increase in the number of static libraries included in the statutory network following completion of the second consultation from four to five, was in response to the consultation feedback and in order to increase the reach of the library service to an area of high service need in East Swindon.

SBC also confirmed that they considered the feasibility of establishing alternative models for the delivery of library services, which included trust and mutual models.

SBC commented that they fully considered the option of a Public Sector Mutual, however after careful exploration and investigation the Council determined that the library service should remain Council run.

The proposed strategy was amended in response to the feedback received and in July 2016, SBC officers recommended a new strategy for consultation. The strategy proposed delivering the library service through a core statutory network of four libraries - Central, West Swindon, Highworth and North Swindon - supported by investment in self-service technology to extend opening hours. It was also proposed that this provision be supplemented by community-led local library services supported by local partnerships. SBC indicated this would result in the core network of four static libraries meeting 74% of current visits and 80% of current users and 85% of Swindon's households would live within 2 miles of a library.

SBC confirmed that in advance of specific proposals regarding the future shape and structure of their Library Service, they undertook a detailed needs assessment of the library provision. SBC confirmed this was published as part of a report to Cabinet of 10 February 2016 and provided a detailed analysis of Swindon's library service provision, Swindon's demographic context and extensive data on service usage. SBC indicated that the needs assessment showed that there was geographical overlap in the usage of their libraries, and that the provision of 15 Libraries and a mobile service at a time of significant budget reductions meant that the Libraries service was stretched across that extensive network. The needs assessment also showed that distinct differences in how Swindon's libraries were used, and that in communities with higher levels of deprivation, those groups were not using the library service.

The Council consulted with residents on this proposal over a period of eight weeks from 1 August to 30 September 2016. 1,632 responses were received in total. In response to the consultation, a submission was made by SBC library staff that proposed a core provision of five libraries, additional staffed hours, and the establishment of a trust model to deliver the service. A detailed submission was also made by Save Swindon's Libraries. The group raised a concern that alternatives to the proposed strategy had not been considered and recommended that the Council make a smaller reduction to the service, consider alternatives, and consider a trust model to run the services, supported by a Friends of Swindon's Libraries charity.

The SBC confirmed that proposed strategy was amended in response to the initial engagement exercise and the consultation feedback and that on 7 December 2016, revisions to the proposals included increasing the number of static libraries to comprise the statutory service, the introduction of extended opening hours at the statutory libraries, an increase in staffed hours at the statutory libraries as a result of Parish and District Councils funding additional library staff time, more flexibility in how business rate costs for the service are met, and bringing forward the feasibility work regarding a trust model for delivery of the service.

SBC further confirmed that they received representations to move Swindon's Libraries into a form of Trust. SBC acknowledged that there were many reasons to consider a Trust model, however they determined that the priority focus in Swindon was to successfully establish the Council's core provision and work to support communities who wished to develop workable solutions that sustain local library services. SBC considered in the short term, a Trust model in itself would have limited impact on Council budgets overall.

SBC further added that following the Cabinet decision of 7 December 2016, they undertook work to fully explore the potential for a move to establish Swindon Library and Information Service as a Public Service Mutual (PSM). SBC indicated they established a Transition Board who reviewed the PSM business plan and the options open to the Council. The Board concluded that the service being delivered directly by the Council presented the least risk and ensured that SBC had direct control over ensuring that the library strategy was delivered with strong staff and community engagement. SBC added that their Cabinet meeting of 6 February 2019 agreed that Swindon Library and Information Service be delivered directly by Swindon Borough Council.

#### Secretary of State's Conclusion

The Secretary of State notes SBC did make changes to their proposals in response to feedback, including increasing the number of core static libraries in the statutory service and the provision of financial support to help establish community libraries and enable the number of libraries across the local authority area to remain the same.

The Secretary of State considers that SBC reasonably considered alternative options and revised its proposals in response to feedback from the initial engagement in February 2016, as well as the consultation in September 2016.



**Issue - Cessation of funding will result in multiple library closures & Reduction in the number of static libraries means that SBC is not delivering its statutory duty**

The criticisms suggest that the cessation of funding to 10 of the local authority's static libraries will result in multiple library closures.

The criticisms also suggest that the reduction in the statutory service from 15 static libraries to five, means that SBC would not satisfy the requirements of section 7 of the Public Libraries and Museums Act 1964.

**SBC response**

SBC commented that while the number of static libraries in the statutory service has reduced from 15 to five, there has been no reduction in the number of libraries operating across the local authority area.

SBC also indicated that it had awarded transitional funding of £347,000 to parish councils and community organisations to help them establish local library services at the non core library locations. The purpose of this funding was to support one-off costs such as to meet equipment costs, IT investment, the temporary funding of facilities and the training and development of local organisations and volunteers. SBC added that they provide staffing to the community libraries.

SBC confirmed that with Parish Council funding the vast majority of opening hours at the community libraries is being provided by SBC staff. SBC further indicated that library users are able to use their Swindon library card in the community libraries.

SBC indicated that the statutory service proposals were revised in response to feedback to the consultations, with the original proposal of one static library, revised to four and subsequently revised further to five. SBC indicated that the agreed core static network of five libraries means that 84% of their library users and 91% of Swindon's households live within 2 miles of a statutory library. SBC considers that this network of core libraries together with the home library service and their outreach service means they are delivering their statutory duty.

SBC also indicated that funding is being provided by a number of Parish Councils and means that additional staffed hours are being provided at their five static statutory libraries. The result of this funding means that SBC have been able to increase the number of staffed hours at their static libraries by 51 hours per week from what was proposed in the September 2016 consultation.

SBC confirmed that they have implemented extended opening hours in all its core libraries that enables library users to access these libraries outside of staffed opening hours. SBC indicated that this means that library users can access each of the five core libraries seven days per week from 8.00am and until 8.00pm on six days a week.

SBC indicated that the library service has maintained its stock fund proportionate to the number of core libraries, and that it continues to make available digital and online services including e-books, e-audio, e-magazines to all library members, as well as from any location, at home or in a library.

SBC further indicated that through a partnership between the library service, the National Literacy Trust and WH Smith, the library service has established a Literacy Hub (Swindon Stories) in Swindon. SBC commented that this project encompasses a range of programmes and activities to equip children and young people in the town with the literacy skills they need to succeed in life.

SBC further confirmed the detailed range of library services that forms their statutory service, and is delivered through their core libraries, community run libraries or other non-library locations, as appropriate to meet the needs of users. These services include a comprehensive outreach service, information and digital services, readers group and local studies.

### Secretary of State's Conclusion

The Secretary of State notes that the number of libraries across the local authority area remains the same, although the number of static libraries within the statutory service has reduced from 15 to five. The Secretary of State also notes the reduction in funding to 10 static libraries, but that SBC has provided transitional funding to support the establishment of non-statutory community libraries. However, as stated above, the Secretary of State has not taken the provision of the community libraries into account when considering to intervene by way of directing an inquiry.

The Secretary of State is satisfied that in making the changes to the library service, SBC has had due regard to its statutory duty to provide a comprehensive and efficient library service, including the desirability of increased access to the core library network. Prior to making the changes SBC undertook a detailed needs analysis, a diversity impact assessment, considered alternative models and carried out detailed consultation.

The Secretary of State recognises that there are a wide range of approaches open to SBC in deciding how to meet its statutory duty and that decisions about the local library service should ordinarily be taken by democratically elected local representatives. SBC has determined that, with the resources available, the comprehensive and efficient service can be delivered from a core network of five static libraries, with reduced staffed hours, professional library services, delivered by qualified librarians and trained library staff, including outreach and learning services, a home library service and with extended access hours at the core libraries offering early morning access seven days per week and evening access six days per week. The Secretary of State considers that there is no serious doubt or uncertainty as to whether SBC is (or may cease to be) complying with its legal obligation to provide a comprehensive and efficient library service.

### **Other Issues**

Other more general representations suggested that in interpreting the 1964 Act and whether the library service is comprehensive and efficient, attention should also be given to the Human Rights Act 1998, as well as the European Convention on Human Rights (ECHR), in particular the right to education

The Secretary of State also notes the criticism that the reduction in staffed hours at Highworth library is a breach of the Military Community Covenant.

The Secretary of State considers that the ECHR and the other international agreements do not alter the approach properly adopted by the Secretary of State as to whether to order a local inquiry under the 1964 Act. The Secretary of State notes that the Convention does not require a specific level of library provision, or alter the approach taken under the 1964 Act.

The Secretary of State notes that SBC has in place an Armed Services Community Covenant and that it is a voluntary statement of mutual support between the civilian community and Swindon's local armed services community and its purpose is to encourage support for the armed services community that either work or reside in the Borough of Swindon. The Secretary of State considers that the issue of whether this is a breach of the Covenant to be for the SBC to address and does not alter the approach properly adopted by the Secretary of State as to whether to order a local inquiry under the 1964 Act.

## Conclusion

For the reasons discussed above, the Secretary of State does not consider there to be any serious doubt or uncertainty as to whether SBC are complying with its legal obligations to provide a comprehensive and efficient library service. The Secretary of State is of the view that SBC's agreed proposals continue to offer a comprehensive and efficient library service and that SBC gave careful thought to ensuring that their library service continues to meet the needs of the community.

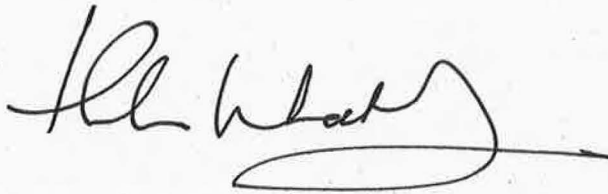
The Secretary of State is minded not to intervene by ordering a local inquiry. The criticisms raised in the representations have been carefully considered and the Secretary of State's present view is that there is nothing in SBC's decision which would justify intervention.

The Secretary of State recognises, however, that the section 7 duty of the Act is a continuing duty, and even though she is minded not to order a local inquiry at this stage, she will continue to monitor the Council's compliance with that duty in the same way as with any other library authority.

The Secretary of State looks forward to receiving any further representations in respect of her proposed decision by **5.00pm on Monday 18 November 2019**.

A copy of this letter will be published on the GOV.UK website.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Helen Whately', with a long horizontal flourish extending to the right.

**Helen Whately MP**  
Parliamentary Under Secretary of State for Arts, Heritage and Tourism