

EQUALITY IMPACT ASSESSMENT FORM

July 2019

THE COUNCIL'S EQUALITIES STATEMENT

This Council recognises that people have different needs, requirements and goals and we will work actively against all forms of discrimination by promoting good relations and mutual respect within and between our communities, residents, elected members, job applicants and workforce.

We will also work to create equal access for everyone to our services, irrespective of ethnic origin, sex, age, marital status, sexual orientation, disability, gender reassignment, religious beliefs or non-belief, use of Welsh language, BSL or other languages, nationality, responsibility for any dependents or any other reason which cannot be shown to be justified.

EIAs are a legal requirement under equalities legislation (Equality Act 2010 (Statutory Duties) (Wales) Regulations 2011) where the potential for a significant negative impact has been identified. This legislation has been in place since 2000. We also have a legislative duty to:

- eliminate unlawful discrimination, harassment and victimisation and other conduct that is prohibited by the Equality Act 2010
- advance equality of opportunity between people who share a relevant protected characteristic and those who do not
- foster good relations between people who share a protected characteristic and those who do not.

The Act explains that having due regard for advancing equality involves:

- removing or minimising disadvantages experienced by people due to their protected characteristics
- taking steps to meet the needs of people from protected groups where these are different from the needs of other people
- encouraging people with protected characteristics to participate in public life or in other activities where their participation is disproportionately low.

The protected characteristics are:

- Age
- Disability
- Gender Re-assignment
- Marriage and Civil Partnership
- Pregnancy and Maternity
- Race
- Religion, Belief or Non-Belief
- Sex
- Sexual Orientation
- Welsh Language*

* The Welsh language is not identified as a protected characteristic under the Equality Act 2010, however in Wales we also have to treat Welsh and English on an equal basis as well as promoting and facilitating the use of the Welsh language.

THE EQUALITY IMPACT ASSESSMENT

NAME OF NEW OR REVISED PROPOSAL *	21 st Century Schools and Colleges Programme - Band B Phase 1 – Ysgol Gymraeg Cwm Gwyddon
DIRECTORATE	Education and Corporate Services
SERVICE AREA	Education Planning and Strategy
CONTACT OFFICER	Andrea West
DATE FOR NEXT REVIEW OR REVISION	As or when required



Ysgolion yr 21ain Ganrif
21st Century Schools



***Throughout this Equalities Impact Assessment Form, ‘proposal’ is used to refer to what is being assessed, and therefore includes policies, strategies, functions, procedures, practices, initiatives, projects and savings proposals.**

The aim of an Equality Impact Assessment (EIA) is to ensure that Equalities and Welsh Language issues have been proactively considered throughout the decision making processes governing work undertaken by every service area in the Council as well as work done at a corporate level.

The Council’s work across Equalities, Welsh Language and Human Rights is covered in more detail through the **Equalities and Welsh Language Objectives and Action Plan 2016-2020**.

When carrying out an EIA you should consider both the positive and negative consequences of your proposals. If a project is designed for a specific group e.g. disabled people, you also need to think about what potential effects it could have on other areas e.g. young people with a disability, BME people with a disability.

There are a number of supporting guidance documents available on the **Corporate Policy Unit Portal** and the Council’s Equalities and Welsh Language team can provide advice as the EIA is being developed. Please note that the team does not write EIAs on behalf of service areas, the support offered is in the form of advice, suggestions and in effect, quality control.

Contact equalities@caerphilly.gov.uk for assistance.

PURPOSE OF THE PROPOSAL

1	<p>What is the proposal intended to achieve? <i>(Please give a brief description and outline the purpose of the new or updated proposal by way of introduction.)</i></p> <p>The Council wishes to make a ‘regulated alteration’ to a maintained school.</p> <ul style="list-style-type: none">• To relocate Ysgol Gymraeg Cwm Gwyddon to a new purpose-built Welsh-medium provision school to be situated at the former Cwmcarn High School site (<i>Cwmcarn, NP11 7NG</i>) with an anticipated occupation date of September 2022.➤ It is proposed that the new building will incorporate a primary facility with Childcare, Special Resource Base (SRB), Nursery, Rising Threes and main school classrooms, main assembly hall, food technology space, a library and Information Technology space.➤ The new building will have improved the outside learning space offering external play areas, a tarmacadam Multi Use Games Area and access to a grass pitch. The use of sporting facilities will also be considered for the community at suitable times in keeping with the curriculum timetable.• To stimulate demand for Welsh medium education, which we know is more sustainable for families if education provision is expanded in line with childcare availability in line with the Welsh Education Strategic Plan (WESP).• To provide additional opportunities for Welsh immersion, facilitate growth in Welsh medium education and use of the Welsh language that will contribute to meeting the Welsh Government’s aim of one million Welsh speakers by 2050.• To agree that officers can proceed to procurement and construction and agree the establishment of an earmarked reserve facility in the Education area of the Council’s accounts.
2	<p>Who are the service users affected by the proposal? <i>(Who will be affected by the delivery of this proposal? e.g. staff members, the public generally, or specific sections of the public i.e. youth groups, carers, road users, people using country parks, people on benefits etc. Are there any data gaps?)</i></p> <p>The following service users have been identified:</p> <ul style="list-style-type: none">• Pupils• Parents, prospective parents, guardians and carers of all pupils of the school directly affected by the proposal• Staff linked to the school directly affected by the proposal, including: Teachers/Administrative Team/Catering/Cleaning/Transport/Leisure/Inclusion Services/ Early Years Team• Local Community

In addition, in line with the guidelines provided by Welsh Government as part of their School Organisation Code 2018 (Statutory document 011/2018). We will consult with the following interested parties:

- Parents, prospective parents, guardians and carers of all pupils of schools directly affected by the proposal
- Headteacher, staff and governors of schools directly affected by the proposal
- Pupils/Pupil Councils of schools directly affected by the proposal
- Directors of Education of all bordering Local Authorities – Blaenau Gwent, Caerphilly, Cardiff, Merthyr Tydfil, Newport, Powys, RCT, Torfaen
- Catholic Diocesan Board of Education
- Church in Wales Diocesan Board
- Local Standing Advisory Council on Religious Education (SACRE)
- Governing body of other schools which the proposer considers are likely to be affected by the proposal
- Local CCBC Members
- All Assembly Members and Members of Parliament representing the area served by the schools directly affected by the proposal
- Welsh Ministers
- ESTYN
- Teaching Associations
- Support Staff Associations
- South East Wales Consortium (EAS)
- South East Wales Transport Alliance (SEWTA)
- Gwent and South Wales Police and Crime Commissioners
- Local Town and Community Councils
- Mudiad Meithrin and voluntary nursery providers
- Menter Iaith
- Early Years Development and Childcare Partnership
- Parent Network
- Welsh in Education Strategic Forum
- Welsh Language Commissioner

No data gaps identified

IMPACT ON THE PUBLIC AND STAFF

3	<p>Does the proposal ensure that everyone has an equal access to all the services available or proposed, or benefits equally from the proposed changes, or does not lose out in greater or more severe ways due to the proposals?</p> <p><i>(What has been done to examine whether or not these groups have equal access to the service, or whether they need to receive the service in a different way from other people?)</i></p>
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Community Use:

Those that attend, work and use the building will benefit from a fit for purpose, innovative 21st Century facility. In addition, the proposal intends to extend access at the new premises to include community use and childcare provision.

As part of the 21st Century School remit, consideration must be given for the school to benefit from enabling the facilities to be shared with the wider community. The proposed project will take into account the desire to encourage and facilitate community use of the asset. To this end the design process will seek to include measures to enable safe 'zoning' of parts of the new school building, including the hall and a multi-functional classroom compliant space which could be adapted for use. The Wi-Fi and Information Technology infrastructure will be established to support public access and community use. The use of sporting facilities will also be considered for the community at suitable times in keeping with the curriculum timetable.

Active Travel:

Local authorities have a statutory duty under Section 10 of the Learner Travel Measure (Wales) 2008 to promote access to education and training through the medium of Welsh. Caerphilly complies with the requirements of the Learner Travel Measure (Wales) 2008 through providing transport to Welsh medium schools for pupils of statutory school age in accordance with our individual transport policy. Caerphilly's transport policy is more generous than the legislative requirement by providing transport to the 'relevant' school (i.e. catchment or nearest school) of more than a distance of 1.5 miles primary and 2 miles secondary.

It is the intention of the Authority to provide a system of transport that will seek to ensure pupils can safely and comfortably access their education. The proposed new location was a former school site and as such a number of 'Safe Travel' routes, as far as reasonably practicable are already established which includes designated bus points, underpass/overpass points, lighting and designated footpaths. The walking route from the existing site is less than 0.9 miles and as such would not be deemed to cause unreasonable levels of stress or take an unreasonable amount of time in line with the measure.

The catchment area for the school will remain unchanged, however it is inevitable that some children will now be eligible and others will no longer be, dependent on where they reside. At present, the authority is projecting an increase in capacity, but this will be controlled through the admissions intake but at this stage it will be difficult to interpret eligibility. Whilst the on-going cost implications have been considered and a contingency has been factored into the Authority's Medium-Term Financial Plan, it is not possible at present to determine the exact figure due to individual pupil needs determining the method of transport required.

Welsh Language in the Community:

'The Cwricwlwm Cymreig is at the heart of the school's work programme and provision for developing the Welsh language is promoted very effectively. The wide range of extra-curricular activities that are provided helps pupils to develop a number of key personal and social skills well' – Estyn 2013

The above comment was provided by Estyn in relation to the existing school

and the proposed project will take into account the desire to encourage and facilitate further development to strengthen and safeguard the promotion of the Welsh language, Culture and Heritage within the Community. This also dovetails into one of the key objectives of the Well-being and Future Generations Act 2015 through the promotion of a Wales of vibrant culture and thriving Welsh Language.

In order to contribute to the Welsh Government target of one million Welsh speakers by 2050, there is significant importance in improving and expanding provision in Welsh medium childcare and education, as well as working in partnership with community based groups or organisations to continue the use of conversational Welsh socially or in the workplace following the end of formal education. Without the continued use of Welsh there is a risk young people from English speaking households may lose confidence in their Welsh language skills.

The development proposed includes Welsh medium childcare from age 2 years upwards enabling early development of Welsh language using immersion methodology. The provision of Welsh medium wraparound, after school and holiday provision will also enable continuation of the Welsh language social skill development and is critical for working parents to provide a full Welsh medium service with parity for those in English medium provision.

A Welsh medium education assessment in accordance with the (Wales) Regulations 2013 has been conducted in accordance with the 3 year cycle requirement. A parental demand survey was also undertaken in 2018. These are the basis for all trend future projections of demand and provide evidence of need for additional places and location in the borough. Previously the parental surveys have influenced the language provision of new build schools, for example, Ysgol Penalltau was opened as a Welsh medium primary school to meet the increasing demand and local area need for Welsh medium provision. There are substantially decreasing surplus places in the Welsh medium Schools and an increasing demand from parents using Cylchoedd Meithrin. The location will better serve those further down the valley as well as enable increased size of provision to meet the increasing evidenced demand including through the Childcare Offer for 3-4year olds.

Specific requirements for Special Resource Base Users:

The Authority recognises the impact of the Additional Learning Needs Act (2018) and the need to future proof Welsh language provision. Through this proposal consideration of the correct types, quantity and quality of provision to meet the future needs of the population has been considered and this project will further support Welsh language resource for those children who require specialist provision outside of mainstream school. This proposal meets the requirements as set in ALNET Act, Welsh Language Standards Act and also the Welsh Education Strategic Plan regulations.

Impact on other schools:

Increasing the admission number by a manageable amount will allow stimulation of the demands for Welsh medium while not over developing the provision to destabilise other already established educational provisions within the area. It is anticipated that the admission number for the new school will be 45 when the school initially opens and will be increased incrementally by 5 per year until it reaches its

	<p>full capacity of 60 pupils.</p> <p>It is clear how important the Welsh language is to life in Wales. Maintaining and increasing the range of Welsh medium provision is a significant challenge for the Council. Changes to Welsh medium primary education will inevitably have an impact upon Welsh medium secondary education</p> <p>The more pupils who enjoy a Welsh medium primary education, the more are likely to attend Welsh medium secondary education and have the fullest opportunities to live their lives in Wales using the Welsh language.</p> <p>Within the borough, as evidenced in the WESP, more learners are continuing to improve their language skills on transfer from primary to secondary school and progression rates remain at a consistently high level. In consideration of the potential impact of this proposal, the site layout and configuration will be undertaken strategically to ensure space maximisation and provide the potential to facilitate Secondary provision in the future should the need to increase capacity be identified in that area.</p>
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4	<p>Is your proposal going to affect any people or groups of people with protected characteristics?</p> <p><i>(Has the service delivery been examined to assess if there is any indirect effect on any groups? Could the consequences of the policy or savings proposal differ dependent upon people's protected characteristics?)</i></p>
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Protected Characteristic	Positive, Negative, Neutral	What will the impact be? If the impact is negative how can it be mitigated?
Age	Positive	Maintaining and expanding Welsh Language Educational provision to include childcare and Additional Learning Needs Provision. Also, wider community use.
Disability	Positive	The current school site has limited accessibility for both pupils and the wider public. The new premises will be an accessible facility which is able to cater for anyone with additional needs.
Gender Reassignment	Neutral	No anticipated change
Marriage & Civil Partnership	Neutral	No impact
Pregnancy and Maternity	Neutral	No impact
Race	Neutral	No anticipated change
Religion & Belief	Neutral	No anticipated change
Sex	Neutral	No anticipated change
Sexual Orientation	Neutral	No anticipated change

5	<p>In line with the requirements of the Welsh Language Standards. (No.1) Regulations 2015, please note below what effects, if any (whether positive or adverse), the proposal would have on opportunities for persons to use the Welsh language, and treating the Welsh language no less favourably than the</p>
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English language.

(The specific Policy Making Standards requirements are Standard numbers 88, 89, 90, 91, 92 and 93. The full detail of each Standard is available on the Corporate Policy Unit Portal. Although it is important that what is outlined in the proposal is available in Welsh and English, please consider wider impacts on Welsh speakers.)

The 21st Century Schools and Colleges Programme supports the provision of Welsh Medium Education and supporting opportunities for persons to use the Welsh Language which is critical to both the Welsh Education Strategic Plan and the Welsh Language Standards plan.

All parents receive information on Welsh medium education from Caerphilly *Starting School booklet* which is distributed with school application forms as well as available on the Caerphilly CBC website and is available in Welsh and English. Parents are able to access information on Welsh medium childcare and Early Years Education provision through Family Information Services as well as the Becoming Bilingual promotional booklets online and in leaflet format in public places.

As set out in its Welsh in Education Strategic Plan, Caerphilly County Borough Council's commitment to the promotion of Welsh language and the provision of quality, attractive educational facilities is evident. This proposal will strive to stimulate demand for Welsh medium education through providing a new fit-for purpose replacement Welsh medium educational facility on the former Cwmcarn High School site.

The Authority has recognised the relationship between the existing school and maintaining the Welsh Language in the village and the school's contribution towards it. The current school site hosts a limited number of activities for the community to participate in through the medium of Welsh and English. The Authority will look to minimise any adverse effects that the relocation of the school may have on the local Cwmcarn village residents and the community's ability to continue to sustain such activities, for example supporting the community to access the local library as a meeting place (Abercarn public library is within 2 minutes walking distance of the current school).

The development of Welsh medium childcare provision on site adjacent to the Welsh medium Foundation Phase nursery will enable continuity of provision for parents as well as continue to strengthen the Welsh language acquisition of the youngest children. The provision of wraparound, after school and holiday provision will enable working families to have the same access to provision as their English medium counterparts as well as enabling children to have social play experiences through the medium of Welsh. There is a positive impact on the Welsh language of all services being on a single site in a cohesive development and making it sustainable for the longer term.

As part of the policy making process, all consultation documentation will be made available in hardcopy and online in both Welsh and English medium in the first instance with other languages and formats available upon request. The Authority already has a clear protocol established in relation to responding to any customer interaction. Correspondence can be in any language or format and corresponding in Welsh will not lead to any delay. In addition, anyone attending the consultation meetings will have the opportunity to conduct the session in their preferred language, Welsh or English.

The consultation document itself will contain specific sections that will proactively encourage all interested parties to consider the effect of the proposals on the Welsh language and have the opportunity to comment on any reasonable actions that would enable the proposal to have a more positive effect/less adverse effect on the Welsh language as well as the impact to relocate the school will have on the opportunities to use the Welsh language within the school or the wider community.

INFORMATION COLLECTION

6	<p>Please outline any evidence and / or research you have collected which supports the proposal? This can include an analysis of service users. <i>(Is this service effectively engaging with all its potential users or is there higher or lower participation of uptake by one or more protected characteristic groups? If so, what has been done to address any difference in take up of the service? Does any savings proposal include an analysis of those affected?)</i></p> <p>There are presently 11 Welsh medium primary schools across the County Borough with a combined capacity of approaching 3000 places.</p> <p>The Caerphilly Welsh in Education Strategic Plan 2017-2020 clearly states that the Authority will work with the 21st Century Schools Team in Welsh Government to identify funding for the development of sufficient Welsh medium places in areas where they are coming under pressure, in particular Bedwas Trethomas Machen area, and the Islwyn East area. This proposal is linked to the Islwyn East area.</p> <p>As part of the research for this proposal, the findings of the Welsh medium education assessment 2018 and the parental demand survey 2018, undertaken as part of the Authority's Welsh in Education Strategic Plan was referred to. These are the basis for all future trend projections of demand and provide evidence of need for additional places and location in the county borough.</p> <p>The existing Ysgol Gynradd Gymraeg Cwm Gwyddon has occupied their current site for 19 years. Located in the heart of a small village in Abercarn, the school is the 3rd occupier of the site which has seen multiple incarnations over the years to utilise the asset to its fullest extent. There are approximately 260 pupils on role, an additional 180 to the original concept to house 80 when the school was originally handed occupancy of the site. The latest information available from the latest condition survey undertaken on the premises utilising the industry recognised 'Faithful and Gould' building surveying methodology has classified the school as Category C for condition. This means the overall condition of the school is 'poor, showing major problems or not operating adequately'.</p>
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CONSULTATION

7	<p>Please outline the consultation / engagement process and outline any key findings. <i>(Include method of consultation, objectives and target audience. What steps have been taken to ensure that people from various groups have been consulted during the development of this proposal? Have you referred to the Equalities Consultation</i></p>
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and Monitoring Guidance?)

The consultation process will proceed in line with the requirements of Welsh Government Statutory Code document no 011/2018 - School Organisation Code 2nd Edition 2018.

A prescribed list of recipients (as outlined in Section 2) will be written to and provided with sufficient information through the publication of a consultation document for intelligent consideration. All documentation will be made available in both Welsh and English throughout the process and other formats on request.

The principles of engagement outlined in the Local Authority's Consultation and Engagement Framework 2020 will also be acknowledged and the project team will engage with any additional 'interested parties' as required.

A consultation document will be published in hard copy and online in both Welsh and English and include a response proforma to enable collection of the views of various persons. This document will be live during the consultation period which lasts for approximately 6 weeks. Adequate time will be provided for consideration and response and conscientious consideration will be given to any responses received.

It is also envisaged that a series of targeted sessions will be held over a given day between the hours of 10am and 8pm to provide information and the opportunity to pose questions to designated officers concerning the proposal. Individuals will be required to book 10 minute appointment slots and a translator will be available if required. As part of this process, the target audiences who will be engaged with include – Pupils (School Council), School Staff, School Governors, Parents/Guardians and the wider Community.

The 21st Century Schools Team has also acknowledged that the pupil voice is essential and involving children and pupils as active participants in the development, delivery, management and improvement of their educational and student experience needs. This information should be at the heart of the planning, provision and evaluation processes.

MONITORING AND REVIEW

8 How will the proposal be monitored?

(What monitoring process has been set up to assess the extent that the service is being used by all sections of the community, or that the savings proposals are achieving the intended outcomes with no adverse impact? Are comments or complaints systems set up to record issues by Equalities category to be able analyse responses from particular groups?)

The programme is managed by a Project Board comprising of the Corporate Director – Education and Corporate Services, Head of Education Planning and Strategy, Chief Education Officer, Cabinet Member for Education and Achievement, Interim Head of Property Services and 21st Century Schools Manager. The Project Board provides the overall direction, management and control for the Programme, being accountable for the success of the Programme and is the ultimate decision-making body for the Programme.

A Project Management Team comprising of the Head of Education Planning and Strategy, and resources and staff from Property Services will oversee the day to day development and implementation of each constituent project, reporting to the Board and other relevant senior officers, as appropriate.

Project management principles will be followed (Prince2 and MS Project) throughout the programme. Programme management principles will be employed for the overarching Band B programme and the project will utilise the experience of the project team involved in the Band A project. This will commence with a Programme execution plan that will define the programme objectives, responsibilities, dependant actions and risks. The latter will include risk elimination or mitigation actions and risk owner. An overall programme monitoring tool will integrate and coordinate procurement, design and construction programmes and will highlight key dependencies and the critical path.

The Council recognises that the whole organisation must be skilled in making the very best use of available resources. Good project management is recognised as being an essential ingredient to success in tackling our strategic work programme.

9 How will the monitoring be evaluated?

(What methods will be used to ensure that the needs of all sections of the community are being met?)

The Council produces a protocol document for each school opening/closure/amalgamation project. This outlines individual and team responsibilities for the full list of actions required over the 3 stages of design and pre-construction, construction and school occupation and decommissioning.

Regular monitoring meetings take place and typically involve 21st Century Schools Team, Headteachers, Education advisers, Property Services, Catering Services, ICT, Traffic Management, Procurement and Audit representation. Relevant stakeholders will also be involved in post project evaluation to review outcomes to ensure improvements are made for future projects.

Benefits Realisation will be monitored by the Project Management Team and Caerphilly County Borough Council and reported to Welsh Government through the project closure report and other relevant documentation. Community benefits will be reported quarterly and yearly and when the project ends.

The project will be subject to gateway review as required by the funding agreement. The review is one by which independent practitioners from outside the programme/project use their experience and expertise to examine the progress and likelihood of successful delivery of the programme or

	<p>project. Any recommendations of the review team will be taken on board and implemented as necessary.</p> <p>A post contract review will also be undertaken.</p>
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<p>10</p>	<p>Have any support / guidance / training requirements been identified? <i>(Has the EIA or consultation process shown a need for awareness raising amongst staff, or identified the need for Equalities or Welsh Language training of some sort?)</i></p> <p>Key personnel have received Equality Impact Awareness and Equalities Awareness Training and attended training and information sessions undertaken by Welsh Government. Training needs will be constantly reviewed throughout the process and addressed when the need is evident.</p> <p>In addition, the 21st Century Schools Manager and Principal Officer have met with representatives from the Equalities, Welsh Language and Consultation Team to take guidance where required.</p>
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<p>11</p>	<p>If any adverse impact has been identified, please outline any mitigation action.</p> <p>The impact identified will be positive as the proposal is to provide inspirational 21st Century facilities.</p> <p>As outlined in further detail on Sections 3 and 5 above, these include:</p> <ul style="list-style-type: none"> • Welsh Language in the Community • Community Use • Special Resource Base • Active Travel <p>Should any negative impact be identified at a later point, due regard will be given and any reasonably practicable mitigation will be put into place. All actions will be fully evidenced in the relevant documentation.</p>
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<p>12</p>	<p>What wider use will you make of this Equality Impact Assessment? <i>(What use will you make of this document i.e. as a consultation response, appendix to approval reports, publicity etc. in addition to the mandatory action shown below?)</i></p> <p>The Equality Impact Assessment will be appended to the report. This is a working document and will be updated throughout the process.</p>
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13	<p>An equality impact assessment may have four possible outcomes, through more than one may apply to a single proposal. Please indicate the relevant outcome(s) of the impact assessment below.</p> <p style="text-align: right;">Please tick as appropriate:</p> <p>No major change – the impact assessment demonstrated that the proposal was robust; there was no potential for discrimination or adverse impact. All opportunities to promote equality have been taken. <input checked="" type="checkbox"/></p> <p>Adjust the proposal – the impact assessment identified potential problems or missed opportunities. The proposal was adjusted to remove barriers or better promote equality. <input type="checkbox"/></p> <p>Continue the proposal – the impact assessment identified the potential problems or missed opportunities to promote equality. The justification(s) for continuing with it have been clearly set out. (The justification must be included in the impact assessment and must be in line with the duty to have due regard. Compelling reasons will be needed for the most important relevant proposals.) <input type="checkbox"/></p> <p>Stop and remove the proposal – the impact assessment identified actual or potential unlawful discrimination. The proposal was stopped and removed, or changed. <input type="checkbox"/></p>
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Form completed by:	
Name:	Andrea West
Job Title:	21 st Century Schools Manager
Date:	01/09/2020

Head of Service Approval	
Name:	Sue Richards
Job Title:	Head of Education Planning and Strategy
Signature:	S. Richards
Date:	01/09/2020