

This integrated impact assessment (IIA) has been designed to help support the Council in making informed and effective decisions whilst ensuring compliance with a range of relevant legislation, including:

- Equality Act 2010 (Statutory Duties) (Wales) Regulations 2011
- Welsh Language (Wales) Measure 2011
- Socio-economic Duty – Sections 1 to 3 of the Equality Act 2010
- Well-being of Future Generations (Wales) Act 2015
- Statutory Consultation v Doctrine of Legitimate Expectation and Gunning Principles

PLEASE NOTE: Section 3 *Socio-economic Duty* only needs to be completed if proposals are of a strategic nature or when reviewing previous strategic decisions. See page 6 of the Preparing for the Commencement of the Socio-economic Duty Welsh Government Guidance.

1. Proposal Details			
Lead Officer	Head of Service	Service Area & Department	Date
Paul O'Neill	Paul Warren	Youth Service/School Improvement	15/3/21

Is this proposal a... (please tick relevant box)								
Policy	<input type="checkbox"/>	Strategy / Plan	Practice	<input type="checkbox"/>	Procedure	X <input checked="" type="checkbox"/>	Restructure	<input type="checkbox"/>

What is the proposal to be assessed? *Provide brief details of the proposal and provide a link to any relevant report or documents.*

That the Crumlin Community Education Centre (Crumlin Institute building) be withdrawn from as a base for Youth Service and other activity, in 2021, aligning with the 5-yearly opportunity from withdrawing from a lease with the building's owners, Llanover Estates.

2. Equality Act 2010 (Statutory Duties) (Wales) Regulations 2011

(The Public Sector Equality Duty requires the Council to have “due regard” to the need to eliminate unlawful discrimination, harassment and victimisation; advance equality of opportunity between different groups; and foster good relations between different groups). Please note that an individual may have more than one protected characteristic.

<u>Protected Characteristics</u>	Does the proposal have any positive, negative or neutral impacts on the protected characteristics and how?	If there are negative impacts how will these be mitigated?	What evidence has been used to support this view?
Age <i>(people of all ages)</i>	<p>Positive impact on young people. 11-25 years, including those with protected characteristics, allowing young people from across a wider geographical area to be offered youth work support.</p> <p>Negative impact on older age-group, in one instance.</p>		<p>The building is no longer viable financially, with a projected outlay of £500-700,000 to maintain a presence in the building over the next 5 year period which sees limited advantage to the main user group, young people – the savings associated with a withdrawal from the lease would enable far greater youth work coverage of the area than currently is the case</p> <p>Initial enquiries regarding the availability of other premises indicate availability</p>
Disability <i>(people with disabilities/ long term conditions)</i>	<p>Positive impact on young people 11-25, allowing for greater access by disabled young people to youth work opportunities</p>		<p>As above</p>

<p>Gender Reassignment <i>(anybody who's gender identity or gender expression is different to the sex they were assigned at birth)</i></p>	<p>Positive impact on young people 11-25 - the capacity gained as a result of being released from the financial burden associated with these premises allow for the wider embedding of the Youth Service's LGBT support arrangements.</p>		<p>The associated savings will provide for a great form of reach for the youth service, enabling an extension of its County LGBT work</p>
<p>Marriage or Civil Partnership <i>(people who are married or in a civil partnership)</i></p>	<p>Neutral</p>		
<p>Pregnancy and Maternity <i>(women who are pregnant and/or on maternity leave)</i></p>	<p>Positive impact on young people 11-25: The Youth Service's Condom distribution arrangements will improve and reach more young people at risk of harmful behaviours, as these resources can be increased following release from the financial constraints of maintaining these premises. Furthermore, improved links and referral arrangements to the Youth Service's Young Parents group will similarly improve.</p>		<p>The Youth Service understands from experience that improved means of outletting condoms and the associated advice provided always attracts more young people to take up services.</p>
<p>Race <i>(people from black, Asian and minority ethnic communities and different racial backgrounds)</i></p>	<p>Neutral</p>		

<u>Protected Characteristics</u>	Does the proposal have any positive, negative or neutral impacts on the protected characteristics and how?	If there are negative impacts how will these be mitigated?	What evidence has been used to support this view?
Religion or Belief (<i>people with different religions and beliefs including people with no beliefs</i>)	Neutral		
Sex (<i>women and men, girls and boys and those who self-identify their gender</i>)	Neutral		
Sexual Orientation (<i>lesbian, gay, bisexual, heterosexual</i>)	<p>Positive impact on young people 11-25:</p> <p>As above, the closure of limited, fixed, building based provision represented by Crumlin Community Education centre allows for the development of capacity in other areas and this will include the Youth Service's support arrangements for LGBT young people from across the County Borough</p>		The associated savings will provide for a great form of reach for the youth service, enabling an extension of its County LGBT work

3. Socio-economic Duty (Strategic Decisions Only)

(The Socio-economic Duty gives us an opportunity to do things differently and put tackling inequality genuinely at the heart of key decision making. Socio-economic disadvantage means living on a low income compared to others in Wales, with little or no accumulated wealth, leading to greater material deprivation, restricting the ability to access basic goods and services)

Please consider these additional vulnerable groups and the impact your proposal may or may not have on them:

- Single parents and vulnerable families
- People with low literacy/numeracy
- Pensioners
- Looked after children
- Homeless people
- Carers
- Armed Forces Community
- Students
- Single adult households
- People misusing substances
- People who have experienced the asylum system
- People of all ages leaving a care setting
- People living in the most deprived areas in Wales (WIMD)
- People involved in the criminal justice system

<u>Socio-economic Disadvantage</u>	Does the proposal have any positive, negative or neutral impacts on the following and how?	If there are negative impacts how will these be mitigated?	What evidence has been used to support this view?
<p>Low Income / Income Poverty <i>(cannot afford to maintain regular payments such as bills, food, clothing, transport etc.)</i></p>	<p>Positive impact on young people 11-25, including</p> <ul style="list-style-type: none"> ➤ Single parents and vulnerable families ➤ People with low literacy/numeracy ➤ Looked after children ➤ Homeless people ➤ Carers ➤ Armed Forces Community ➤ Students ➤ Single adult households ➤ People misusing substances ➤ People of all ages leaving a care setting ➤ People living in the most deprived areas in Wales (WIMD) ➤ People involved in the criminal justice system 		<p>The savings related to the disposal of these premises will allow for the greater frequency, type and amount of youth work to be delivered, with either coincidental or targeted benefit to those with protected characteristics.</p> <p>The Youth Service’s equalities monitoring arrangements demonstrate the need for greater consideration in these terms and partner agencies frequently communicate information that supports this understanding – for example, specialist drugs agencies will share intelligence to this effect. The Youth Service’s Homelessness section reports a continuing and significant prevalence of young people at risk of homelessness.</p>
<u>Socio-economic Disadvantage</u>	Does the proposal have any positive,	If there are negative impacts how	What evidence has been used to

	negative or neutral impacts on the following and how?	will these be mitigated?	support this view?
Low and/or No Wealth (<i>enough money to meet basic living costs and pay bills but have no savings to deal with any unexpected spends and no provisions for the future</i>)	Positive – closure of these premises allows for opportunities to reach out to individuals in economic distress to a degree not currently achievable whilst maintaining a high level of financial, premises-related burden.		Alternative delivery arrangements have been discussed in detail and remain to be implemented
Material Deprivation (<i>unable to access basic goods and services i.e. financial products like life insurance, repair/replace broken electrical goods, warm home, hobbies etc.</i>)	As above		As above
Area Deprivation (<i>where you live (rural areas), where you work (accessibility of public transport)</i>)	As above		As above
Socio-economic Background (<i>social class i.e. parents education, employment and income</i>)	As above. Furthermore, the delivery options accruing from the closure of these premises will allow for greater cross-team integration within the Youth Service and therefore greater opportunity to work more effectively and collaboratively with young people and families with challenging socio-economic backgrounds.		As above.

<p>Socio-economic Disadvantage <i>(What cumulative impact will the proposal have on people or groups because of their protected characteristic(s) or vulnerability or because they are already disadvantaged)</i></p>	<p>Anticipated impact includes the prevention of young people becoming NEET (Not in Education, Employment or Training) and their successful transition and progression following the end of their compulsory education.</p>		<p>LA NEETs statistics/Engagement and Progression data and modelling</p>
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4. Corporate Plan – Council’s Well-being Objectives

(How does your proposal deliver against any/all of the Council’s Well-being Objectives? Which in turn support the national well-being goals for Wales as outlined in the Well-being of Future Generations (Wales) Act 2015. Are there any impacts (positive, negative or neutral? If there are negative impacts how have these been mitigated?) Well-being Objectives

Objective 1 - Improve education opportunities for all	The Youth Service, the Authority’s statutory education service with the broadest brief, will have a greater reach, given the savings associated with the disposal of these premises.
Objective 2 - Enabling employment	The associated improvements in service delivery will see a greater blending of NEETs provision, as part of the Engagement and Progression duty that is placed with the Youth Service.
Objective 3 - Address the availability, condition and sustainability of homes throughout the county borough and provide advice, assistance or support to help improve people’s well-being	Wellbeing-related improvements in service delivery will be achievable as a direct consequence of the disposal of this building.
Objective 4 - Promote a modern, integrated and sustainable transport system that increases opportunity, promotes prosperity and minimises the adverse impact on the environment	The enactment of this proposal will reduce the transport burden on young people by reducing the necessity of travel to a fixed point of youth work delivery and allow for the investment of peripatetic youth work that engages young people in their communities
Objective 5 - Creating a county borough that supports healthy lifestyle in accordance with the Sustainable Development principle with in the Well-being of Future Generations (Wales) Act 2015	The proposal will allow for the broader delivery of the Youth Service’s curriculum, which includes a significant element of health-related education.
Objective 6 - Support citizens to remain independent and improve their well-being	






4a. Links to any other relevant Council Policy

(How does your proposal deliver against any other relevant Council Policy?)

Flexible working – given the principles of the Authority’s flexible working arrangements/developing policy, expensive, fixed bases for officers to be permanently located are no longer required and Crumlin Institute represents the main example of such a location within the Youth Service’s asset portfolio. It is no longer the case that key area officers must be stationed in this location – the need, in fact, is for officers to be more mobile than in the past. Furthermore, given the working flexibilities demonstrated by the service during the pandemic lockdown, it seems likely that a percentage of officers’ administration and management time may be more effectively conducted at home. The trend over the past decade has anyway for Youth Service and other officers to move away from being based in Crumlin, given that the delivery of youth Service education has ‘moved on’ in that period. Therefore, it is no longer either financially viable not desirable to base officers in such premises.

5. Well-being of Future Generations (Wales) Act 2015 – The Five Ways of Working (ICLIP)

(Also known as the sustainable development principles. The Act requires the Council to consider how any proposal improves the economic, social, environmental and cultural well-being of Wales using the five ways of working as a baseline)

<u>Ways of Working</u>	How have you used the Sustainable Development Principles in forming the proposal?
<p>Long Term</p> 	<p>Consider the long-term impact of the proposal on the ability of communities to secure their well-being.</p> <p>The proposal is made against the backdrop of achieving lasting and positive change, allowing the service to respond more effectively to the needs of young people, their communities, and the Youth Service’s partners. Conversely, the retention of these premises only supports a short-term and limited form of educational reach.</p>
<p>Prevention</p> 	<p>Consider how the proposal is preventing problems from occurring or getting worse</p> <p>The Youth Service is the main service of inclusion in the Authority and as such has a significant prevention remit in terms of Anti-social Behaviour, poor mental and physical health, Homelessness, NEETs and School disengagement.</p>
<p>Integration</p> 	<p>Consider how your proposal will impact on other services provided in our communities (these might be Council services or services delivered by other organisations or groups)</p> <p>The Youth Service’s role is to integrate and reintegrate young people into their communities, into education and into employment/training. The flexibilities achieved to service delivery by the withdrawal from these premises would assist in this activity.</p>
<p>Collaboration</p> 	<p>Consider how you are working with Council services or services delivered by other organisations or groups in our communities.</p> <p>The retention of these premises allows for limited collaboration with other agencies: Indeed, selected partner agencies, including Gwent Police, have clearly expressed a greater flexibility of Youth work delivery that can only be achieved by releasing the building from the organisation’s responsibility, allowing local youth work organisers to collaborate freely and effectively with a variety of partners, including Secondary Schools, employers, Social Services and others.</p>
<p>Involvement</p> 	<p>Consider how you involve people who have an interest in this proposal and ensure that they represent the diversity of our communities.</p> <p>Above all, the Youth Service is one of Participation – the service delivers youth work <i>with</i> the involvement of young people, rather than <i>for</i> them or <i>to</i> them. For a significant period of time, young people have expressed a wish for the service to delivery more flexibly and this approach will be strengthened via the disposal of this leased property. During the lockdown period associated with the Covid-19 pandemic, the Youth Service introduced new methodologies to its work, proving successful in involving young people in education at a time when this was otherwise challenging to do. The freedom to deliver more youth work in an</p>

	alternative vein, building on recent developments, will accrue from the disposal of a building that at present provides too fixed and inflexible options for delivery.
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6. Well-being of Future Generations (Wales) Act 2015

<u>Well-being Goals</u>	Does the proposal maximise our contribution to the Well-being Goal and how?
<p>A Prosperous Wales <i>An innovative, productive and low carbon society which recognises the limits of the global environment and therefore uses resources efficiently and proportionately (including acting on climate change); and which develops a skilled and well-educated population in an economy which generates wealth and provides employment opportunities, allowing people to take advantage of the wealth generated through securing decent work</i></p>	<p>Efficient use of resources, skilled, educated people generates wealth and provides jobs The release of the use of this building reduces the Authority's carbon footprint, freeing youth workers from being bound to a particular site and thereby cutting waste in terms of heating, lighting and other energy-wasteful practices associated with the use of an old and non-ecologically friendly location.</p>
<p>A Resilient Wales <i>A nation which maintains and enhances a biodiverse natural environment healthy functioning ecosystems that support social, economic and ecological resilience and the capacity to adapt to change (for climate change)</i></p>	<p>Maintain and enhance biodiversity and ecosystems that support resilience and can adapt to change (e.g. climate change)</p>
<p>A Healthier Wales <i>A society in which people's physical and mental well-being is maximised and in which choices and behaviours that benefit future health are understood</i></p>	<p>People's physical and mental well-being is maximised and health impacts are understood The removal of a financially wasteful and fixed location for the delivery of youth work, with all its attendant inflexibilities in terms of educational delivery, allows for the wider delivery of the service's curriculum, most especially its Health education aspect: Furthermore, youth workers will engage more with young people in outdoor locations across the County Borough, taking advantage of appropriate opportunities for engaging young people in physical and sporting activities.</p>
<p>A More Equal Wales</p>	<p>People can fulfil their potential no matter what their background or circumstances. This includes the</p>

A society that enables people to fulfil their potential no matter what their background or circumstances (including their socio-economic background and circumstances)

protected characteristics listed in Q2 above. Also consider the cumulative impacts.

The Youth Service carries specific responsibilities in terms of assisting young people to reach their potential and challenges socio-economic challenges, enabling young people to thrive more educationally, be more integrated into their communities and to make a successful transition to adulthood: The flexibilities realised via the removal of this building from the service's asset portfolio will allow a more fair form of access by young people to youth workers for these purposes.

<u>Well-being Goals</u>	Does the proposal maximise our contribution to the Well-being Goal and how?
<p>A Wales of Cohesive Communities <i>Attractive, viable, safe and well-connected communities</i></p>	<p>Communities are attractive, viable, safe and well connected.</p> <p>Yes. Community cohesion is a discrete aspect of youth work delivery, including with specific regard to crime and anti-social behaviour reduction. The youth club currently located in these premises performs well for a limited number of young people (there are over 50 members) but the wider youth population in the area, including in the communities of Newbridge and Oakdale, are unable to access the premises for reasons of travel limitations, poor lighting/safety considerations, lack of willingness to travel and lack of access to transport. Relocating youth work support from Crumlin Institute will allow for the greater and more positive influence of youth workers in the wider area by means of either ‘detached’ work (where they will work with residents, the Police and others to identify locations of need), ‘virtual’ work (utilising social media and other online opportunities for engagement with young people) or occasional building based work in shared locations such as Libraries and community centres, thereby making the wider community a safer place for young people and other residents.</p>
<p>A Wales of Vibrant Culture and Thriving Welsh Language <i>A society that promotes and protects culture, heritage and the Welsh language, and which encourages people to participate in the arts, and sports and recreation</i></p>	<p>Culture, heritage and the Welsh language are promoted and protected. People are encouraged to participate in sport, art and recreation.</p> <p>The financial advantages represented by a withdrawal from this expensive lease arrangement includes the expansion of the Welsh Youth Work offer – this will enable the positioning of Youth Workers with related skills to be present in more communities than is currently the case.</p>
<p>A Globally Responsible Wales <i>A nation which, when doing anything to improve the economic, social, environmental and cultural well-being of Wales, takes account of whether doing such a thing may make a positive contribution to global well-being</i></p>	<p>Taking account of impact on global well-being when considering local social, economic and environmental well-being.</p> <p>The membership and mechanisms of the Youth Service’s Junior and Youth Forums, especially active via the adoption of related annual priorities, will be more available to more young people and in more locations than is currently the case, due to the opportunities for peripatetic youth work that will arise from a release from the currently fixed location of youth work in Crumlin.</p>

7. Welsh Language (Wales) Measure 2011 and Welsh Language Standards

(The Welsh Language Measure 2011 and the Welsh Language Standards require the Council to have 'due regard' for the positive or negative impact a proposal may have on opportunities to use the Welsh language and ensuring the Welsh language is treated no less favourably than the English language) [insert link to WL Commissioners Policy Making Standards Guidance](#)



Requirement	Does the proposal have any positive, negative or neutral impacts on the following and how?	If there are negative impacts how will these be mitigated?	What evidence has been used to support this view? <i>e.g the WESP, TAN20, LDP, Pupil Level Annual School Census</i>
<p>Links with Welsh Government's Cymraeg 2050 Strategy and CCBC's Five Year Welsh Language Strategy 2017-2022 and the Language Profile</p>	<p>Positive: The service will benefit financially from the release of the building, in turn allowing for the expansion of its Welsh language youth work arrangements that are currently more limited in scope.</p>		
<p>Compliance with the Welsh Language Standards. <i>Specifically Standards 88 - 93</i></p>	<p>In supporting the expansion of the Service's Welsh language youth work offer, the proposal complies with Welsh language standards, not limited to standards 88-93 in terms of widening opportunities for young people to enhance their Welsh language skills via the release of financial capacity that supports practice for this purpose</p>	<p>Ensure correspondence and details on the website is bilingual even if the proposal has no impact on the Welsh language e.g road resurfacing works</p>	
<p>Opportunities to promote the Welsh language <i>e.g. status, use of Welsh language services, use of Welsh in everyday life in work / community</i></p>	<p>Actively encourage and promote the use of our services in Welsh to see an increase in demand over time An expansion of Welsh youth work provision will widen opportunities for the use of Welsh in an educational context.</p>		

<p>Opportunities for persons to use the Welsh language <i>e.g. staff, residents and visitors</i></p>	<p>The rights of Welsh speakers to use Welsh when dealing with the council and for staff to use Welsh at Work As above – the Welsh language and related aspects will have the opportunity to feature more prominently in the delivery youth work than is currently the case should service delivery widen as a consequence of disposing of the current building lease and accompanying financial burden. However, should a Welsh language class, previously delivering from these premises, wish to be reinstated, it will necessarily need to locate an alternative site – assistance with this will be provided as necessary</p>		
<p>Treating the Welsh language no less favourably than the English language</p>	<p>As above</p>		

7a. Having considered the impacts above, how has the proposal been developed so that there are positive effects, or increased positive effects on (a) opportunities for persons to use the Welsh language, and b) treating the Welsh language no less favourably than the English language.

Yes – this proposal supports the wider delivery of youth work in the medium of Welsh.

8. Data and Information

(What data or other evidence has been used to inform the development of the proposal? Evidence may include the outcome of previous consultations, existing databases, pilot projects, review of customer complaints and compliments and or other service user feedback, national and regional data, academic publications and consultants' reports etc.)

Data/evidence <i>(Please provide link to report if appropriate)</i>	Key relevant findings	How has the data/evidence informed this proposal?
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<p>What data / evidence was used? Provide links to any reports if appropriate e.g. Household Survey 2017</p> <p>Previous consultation. Youth Service staff and young people had previously commented on the need to expand youth work delivery methodology in order to reach young people – that consultation was not specific to the use or otherwise of this building but is linked to the inflexibilities of being operationally tied to fixed locations.</p> <p>Data – The youth work accessed at this site is of good quality though is limited in terms of the % of local youth population reached from the surrounding area.</p> <p>A recent pilot delivery of youth work in a nearby location has proven the efficacy of moving delivery away from a fixed locations-only approach to one that has greater inbuilt flexibility.</p>	<p>What were the key findings? What did the data / evidence used tell you?</p>	<p>How has the data / evidence available helped inform the proposal? Did it support the proposal and how? If the data / evidence didn't support the proposal why was this?</p>
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Were there any gaps identified in the evidence and data used to develop this proposal and how will these gaps be filled?
Details of further consultation can be included in Section 9.

Are there any gaps in the existing data and how will you go about filling these gaps?
There are no perceived gaps with regards to any further evidence required to further this proposal

9. Consultation
(In some instances, there is a legal requirement to consult. In others, even where there is no legal obligation, there may be a legitimate expectation from people that a consultation will take place. Where it has been determined that consultation is required, [The Gunning Principles](#) must be adhered to. Consider the [Consultation and Engagement Framework](#). Please note that this may need to be updated as the proposal develops and to strengthen the assessment.

Briefly describe any recent or planned consultations paying particular attention to evidencing the Gunning Principles.

Who was consulted?

The consultation process is largely complete. The relevant youth work teams who operate from the building have been met with. More formalised communication has also taken place with the following stakeholders –

- **Coleg Gwent – this institution had, previous to lockdown, operated a Welsh class from the building. There is no intention to resume.**
- **A local cardiac rehabilitation group. The Youth Service has good links with this group and has discussed the overall position regarding the building but the group has since moved on to an alternative venue.**
- **A local exercise class that had operated for an hour per week previous to lockdown has been contacted but with no response – it is believed that there is no intention to resume class delivery at the site.**

Young people who had, previous to lockdown, attended the provision and are still being engaged with by alternative means are currently being engaged with on this matter by blended means – via face to face meetings indoors, via the use of outreach work, and online.

How have the consultation findings been taken into account?

10. Monitoring and Review

<p>How will the implementation and the impact of the proposal be monitored, including implementation of any amendments?</p>	<p>For example, what monitoring will be used? How frequent? Via the Youth Service’s internal Quality Performance management system and the Education Directorate’s Service Improvement Plan monitoring processes and Corporate Performance management measures.</p>
<p>What are the practical arrangements for monitoring?</p>	<p>For example, who will put this in place? When will it start? Alternative Youth Work delivery will be subject to statistical measure and observation of quality of delivery.</p>
<p>How will the results of the monitoring be used to develop future proposals?</p>	<p>Experiences arising from the implementation of this proposal may inform any other similar arrangements in other parts of the County Borough.</p>
<p>When is the proposal due to be reviewed?</p>	<p>N/A</p>
<p>Who is responsible for ensuring this happens?</p>	<p>N/A</p>

11. Recommendation and Reasoning

- Implement proposal with no amendments
- Implement proposal taking account of the mitigating actions outlined
- Reject the proposal due to disproportionate impact on equality, poverty and socio-economic disadvantage

Have you contacted relevant officers for advice and guidance? Yes No

12. Reason(s) for Recommendation

(Provide below a summary of the Integrated Impact Assessment. This summary should be included in the "Summary of Integrated Impact Assessment" section of the Corporate Report Template. The Integrated Impact Assessment should be published alongside the Report proposal).

Crumlin Institute is no longer a facility that is viable financially or operationally, nor is its retention in the best interests of young people and the wider community. The financial review of the building conducted this year, which includes anticipated costs for the next 5 years if retained (£500,000-£700,000) is, taken in isolation, sufficiently conclusive to support CCBC's removal from the current lease arrangement – for example, these costs compare very unfavourably with other locations within and without the youth service's asset portfolio.

Given the building's size and type, relatively small amounts of usage remain, given that services have gradually withdrawn from the premises over the course of the past decade – this does not represent good value for money nor the efficient use of space – given the age and design of the building, its use is increasingly challenging to manage and this is a diversion of managerial resources from the business of youth work.

13. Version Control

(The IIA should be used in the early stages of the proposal development process. The IIA can be strengthened as time progresses to help shape the proposal. The Version Control section will act as an audit trail to evidence how the IIA has been developed over time)

Version No.	Author	Brief description of the amendments/update	Revision Date

Integrated Impact Assessment Author

Name:	Paul O'Neill
Job Title:	Senior Youth Service Manager
Date:	15/3/21

Head of Service Approval

Name:	Paul Warren
Job Title:	Lead Officer for School Improvement.

Signature:		Date:	
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