

# Equality Impact Assessment

## 1. What are you assessing?

Proposal to change the age range of St Nicholas Church in Wales Primary School from 4 to 3 to include 24 part time nursery places from September 2023.

## 2. Who is responsible?

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<b>Team</b>	Cymunedau Cynaliadwy ar gyfer Dysgu	<b>Directorate</b>	Learning & Skills

## 3. When is the assessment being carried out?

<b>Date of start of assessment</b>	18 March 2022
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## 4. Describe the proposal?

### **What is the purpose of the proposal?**

In February 2022, the Council launched a new consultation aimed at adding nursery provision in St Nicholas and Bonvilston. The aim of the consultation was to inform the community about the school proposal being put forward to provide nursery education by extending the age range of St Nicholas CIW Primary from 4-11 to 3- from September 2023, and to seek feedback on this proposal.

The feedback and views expressed in the consultation are being considered together in the publication of a consultation report on the proposal and this Equality Impact Assessment.

The proposal being put forward is to build a new 126 place school building for St Nicholas CIW Primary, with the addition of a 24-part time nursery which would be located in St Nicholas. It is proposed that all pupils, staff, and governors from St Nicholas CIW Primary would transfer into the new school building. Although the transferring of the school to the new building is included as part of this consultation, this is not subject to the statutory process as the transfer would be within 1.609344 kilometres (1 mile).

All staff and pupils would move to the new school building and the governing body would remain unchanged. Careful planning and management of any transitional arrangements would be necessary to mitigate the challenges of pupils moving in to the area between 2022 and 2023, ensuring no disadvantage to pupils moving to the new school building or negative impact on the current good performance of St Nicholas CIW Primary.

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## Why do you need to put it in place?

### Housing Developments

A number of large-scale housing developments are planned for the Vale of Glamorgan area. Planning permission has been granted for 117 dwellings to the east of St Nicholas and 120 dwellings to the east of Bonvilston. These housing developments are situated within the catchment area for St Nicholas CIW Primary School.

The projected number of pupils emanating from a development is calculated using a formula derived from census data of householders in the Vale of Glamorgan. The formula is contained within the Council's Supplementary Guidance for planning purposes.

The development in total is projected to yield around 24 nursery and 66 primary school pupils.

However, the original proposal to expand the school to 210 places was developed in 2018/19. Therefore, a reassessment of the arising demand for school places has been undertaken. St Nicholas CIW Primary School currently has 121 pupils on roll against a capacity of 126. However, 72% of the pupils in the school attend from outside of the Vale of Glamorgan Authority area. This means there is adequate capacity to accommodate the increase in primary school demand but there is currently no capacity to meet the nursery demand from the housing developments. The formula used to determine pupil yield from housing developments has recently been evaluated across a number of completed housing developments and has accurately reflected actual demand.

The development in St Nicholas is now complete and the majority of properties have been occupied. There are approx. 14 pupils from the new development currently attending schools in the Vale (5 of which attend St Nicholas). This is consistent with what has been seen at other developments where it takes a number of years for pupil yield to grow. The development in Bonvilston has started but no dwellings have been occupied to date. This means pupil yield is still projected to grow by 52 pupils within the St Nicholas catchment area.

51 pupils currently attend English medium CIW primary schools from the St Nicholas CIW Primary School catchment area. Currently only 19 of these attend St Nicholas CIW Primary School. The current lack of nursery provision could be a factor in this as parents could opt for schools with early years provision.

The St Nicholas CIW Primary School catchment area is likely to grow from 67 primary-aged pupils to 119 if we include projected yield from housing developments. Approx. 14% (17) of these are likely to attend WM based on current trend. This means St Nicholas CIW Primary School will have a potential catchment population of 102 primary pupils following the completion of the housing developments.

### Condition of existing buildings

St Nicholas CIW Primary School is a timber clad building which has been categorised as being of poor condition and suitability. This means the school is exhibiting major defects

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and teaching methods are adversely affected. It would not be possible to refurbish teaching areas to fully meet 21st century standards.

The school is split over two sites with reception pupils having to walk to the nearby 'Old School' following morning assembly. There is no path along this stretch of road.

Classroom sizes are inconsistent throughout the building. There are currently 72 children being taught across two classrooms.

Building Bulletin 99: Briefing Framework for Primary School Projects advises that a sink, washable floor area and resources for simple 'wet' practical activities are required. This promotes good hygiene, prevents sickness, and allows water play activities. Some classrooms at St Nicholas CIW Primary School do not currently have a water supply.

The outcome of the 2018 condition survey is outlined below.

**Table 1: 2018 condition survey**

School	Type	Condition	Suitability	Backlog Maintenance
St Nicholas CIW Primary School	Voluntary Controlled	Poor	Poor	£730,276

The backlog maintenance includes the following.

**Table 2: Backlog maintenance record**

Building element	2019 estimate (£)
Structural repairs to timber frame	462,200
Flat roof renewal	196,435
Repairs to annex building	34,665
Internal redecoration, renewal of floor coverings and minor repairs	28,888
Install ventilation fans and blending valves in toilets.	8,089
<b>Total</b>	<b>730,276</b>

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The most recent Condition Report undertaken in 2022 which has identified the repair and maintenance costs for the school buildings has increased from the 2018 condition report and is estimated to cost £1.77m over the next 5-year period.

St Nicholas CIW Primary School has been included as part of the Council's 21st Century Schools Programme. A new 126 place school building would be built on the existing school site. It is anticipated that the new school building would open by September 2023, to provide sufficient space for the increased demand and address the condition and suitability issues with the existing buildings.

Pupils would be educated in a high-quality modern building which would be able to support the delivery of a broad and balanced curriculum.

## Nursery Provision

St Nicholas CIW Primary School does not currently offer nursery provision.

It is proposed that 24 part time nursery places are provided to develop continuity and progression in children's learning from the age of three. This would ensure there is a consistent approach to planning and delivery of the foundation phase (nursery to year two) and reflect the nursery years learning strategy for the Vale of Glamorgan.

In terms of demand for nursery places, as there is no provision at the existing school there is no historic admissions data to demonstrate demand. However, using the most recent population projections, the likely nursery age population in the St. Nicholas CiW School catchment area can be estimated for future years to give an indication of likely demand for nursery places for the school. Table 8 below demonstrates the predicted nursery pupils in the catchment area based upon the 2018-based principal population projections accounting for the 2019 mid-year population estimates.

**Table 3: Projected Nursery Provision**

Age	2023	2024	2025	2026	2027
3	12	12	12	13	13
4	6	6	6	7	7

## Do we need to commit significant resources to it (such as money or staff time)?

Subject to the approval of this proposal, a significant capital investment would be made to establish a new school building for St Nicholas CIW Primary School. The Council would manage the process and the governing body, staff, parents, and pupils of St Nicholas CIW Primary School would be fully engaged in the development of the plans. The Council would also be responsible for managing the construction.

The cost of the original proposal was approved as part of a Business Justification Case (BJC) submitted to Welsh Government in June 2022. However, since the BJC was submitted there have been a number of changes and delays to the implementation of the proposal and this has impacted on the project costs. The original BJC was approved for

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£4.999m project to develop 210 place school on the existing site by September 2022. However, this cost was based upon savings made through bringing forward 3 projects together at the same time which included the redevelopment of St David's CiW Primary School, St Nicholas CiW Primary School, and Llanccarfan Primary School (known as South Point Primary). The initial cost savings for the schemes could not be realised as they did not progress at the same time. In particular the development of St Nicholas CiW Primary School was delayed significantly with the original planning proposal being refused for the 210 primary school. This has resulted in the scheme not benefiting from the original envisaged savings. Furthermore, costs were increased due to the need to redesign the scheme to ensure it addressed the concerns which resulted in its original refusal.

In addition to the loss of the original savings for the project, global events have had a significant impact upon prices within the market for construction materials. This has been linked to the initial impact of Brexit, the Covid-19 pandemic, and the war in Ukraine. Consequently, the cost of the proposal in its current form has risen to £7.03m. The original scheme was to be funded at a ratio of 56.3% Council and 43.7% Welsh Government. This was a significant reduction on the usual contribution rate for faith schools of 85% Welsh Government and 25% Council. This difference in the contribution rate was due to the amount of section 106 funding available to redevelop the school. To meet the increased costs, the Council would maintain the amount allocated to fund the school from section 106 funds and Welsh Government would increase their contribution to 60% which is still below the 85% contribution rate for faith schools.

Officer time has been addressed within the Vale of Glamorgan Council via the creation of a Sustainable Communities for Learning Team.

### **What are the intended outcomes of the proposal?**

Expanding the school and relocating to a new school building would;

- Enable the school to further improve while catering for a wider pupil demographic.
- Ensure the Council is able to accommodate the future demand for faith-based education based on current trends.
- Provide innovative and creative learning environments which are adaptable to change and will challenge and support children to reach their full potential.
- Increase the level of community access and interaction through the use of the school's educational facilities whilst meeting the needs of the school.
- The new building will meet BREEAM (Building Research Establishment Environmental Assessment Method) Excellent standards and be built to an EPC (Energy Performance Certificate) A rating.
- Establish a nursery unit which offers a more efficient and sustainable model of delivery of education for the 21st Century that meets national building standards and reduces the recurrent costs and carbon footprint of education buildings.
- Develop the ethos and culture of the school in children from an earlier age, leading to effective interpersonal relationships and higher self-esteem.
- Provide a consistent approach from 3-11 years to promote and underpin continuity and progression for pupils, ensuring breadth and balance across the curriculum.
- All curriculum planning and resourcing would build successfully on previous pupil knowledge and experience and engage interest.

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- Support pupils to develop their ability to learn new skills and apply their subject knowledge more positively and creatively across a continuum of learning.
- Improve the already good arrangements for the care, support, and guidance of pupils from an earlier age.
- Extend and develop partnerships with families from the earliest opportunity to strengthen home / school transition.

## **Who does the proposal affect?**

All staff, pupils, parents of pupils, and governors at St Nicholas CIW Primary on the date of the move to a new improved school building in Bonvilston. The date of the move is anticipated to be September 2023.

In addition this proposal if implemented would provide a local school for the growing St Nicholas and Bonvilston communities and surrounding areas, ensuring that the majority of pupils can be educated at a school within their community.

## **Will the proposal affect how other organisations work?**

The proposal is unlikely to have a significant impact on any other schools in the local area. Whilst the Council is increasing the number of nursery places, there is currently no nursery offer within the current catchment area of St Nicholas CiW primary School. If the proposal does not go ahead the school will not be able to meet the future demand for school places from the new housing developments in St Nicholas and Bonvilston area.

## **Will the proposal affect how you deliver services?**

The Council must ensure that schools serve their local communities and are reflective of demand. There is a need to meet future demand from the new housing developments in St Nicholas and Bonvilston. A new 126 place school would accommodate the projected increase in pupil numbers from the new development in St Nicholas and Bonvilston, in addition to the projected pupil numbers that would move from the existing school of St Nicholas CIW Primary. Reviewing the wider needs of St Nicholas and Bonvilston offers an opportunity to establish a new 21st century school building while addressing community need and surplus capacity challenges.

All staff and pupils would move to the new school building and the governing body would remain unchanged. Careful planning and management of any transitional arrangements would be necessary to mitigate the challenges of pupils moving in to the area between 2022 and 2023, ensuring no disadvantage to pupils moving to the new school or negative impact on the current performance of St Nicholas CIW Primary.

The needs of the new school community that will attend this school in future cannot be known, however a great deal of information is available with relation to the population within the Vale of Glamorgan. This can be accessed from the following sources.

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Household projections by local authority <https://gov.wales/sites/default/files/statistics-and-research/2020-08/subnational-household-projections-local-authority-2018-based-272.pdf>

Future population trends <https://gov.wales/sites/default/files/publications/2021-12/future-trends-report-wales-2021-narrative-summary.pdf>

ONS 2016 population estimates <https://gov.wales/mid-year-estimates-population-2020>

Protected characteristic data from 2011 Census  
<https://gov.wales/statistics-and-research/census-population/?lang=en>

## **Will the proposal impact on other policies or practices?**

The proposal is part of the councils overall strategic outline programme for Band B of the Sustainable Communities for Learning Programme. The operation of the school would continue to be supported by many policies and procedures. The governing body would be required to continue to comply with all policies, including the Council and schools Equality Policies. All schools have their part to play in meeting the equality objectives that the Learning and Skills Directorate is responsible for delivering and support the performance reported on in the annual equality monitoring report where appropriate.

The Vale of Glamorgan Local Development Plan (LDP) 2011-2026 provides the local planning policy framework for the Vale of Glamorgan and was adopted by the Council on 28 June 2017.

## **Can you change the proposal so that it further promotes equality of opportunity and fosters good relations?**

The proposal being put forward is to build a new 126 place school building for St Nicholas CIW Primary, which would be located on the current site. It is proposed that all pupils, staff, and governors from St Nicholas CIW Primary would be provided with a new school building. The building will be designed to improve accessibility and promote equality of opportunity for education for more pupils over an increased age range. It would provide the school with improved facilities which would enable them to promote equality of opportunity and foster good relations between those with different protected characteristics. Specific consideration to feedback in relation to pupils with disabilities has been fed into the consultation document and in turn would be reflected in the design for the new building.

Our formal consultation process follows Welsh Government guidelines outlined in the School Organisation Code 2018. A range of individuals and groups were asked for their views about these proposals during the period 1 February to 15 March 2022. All responses received as part of the consultation are reflected in the Consultation Report.

Before any decisions are made, the Council needs to ensure that it offers a number of opportunities for individuals and interested groups to make their views and opinions on the proposals known.

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The Council consulted with the following groups:

Staff (teaching and non-teaching) at St Nicholas CIW Primary School	Governing Body of St Nicholas CIW Primary School
Parents/Carers and Guardians of children attending St Nicholas CIW Primary School	St Nicholas with Bonvilston Community Council
Vale of Glamorgan Children and Young People's Partnership	Vale of Glamorgan Early Years Development Partnership (EYDCP)
Assembly Members (AM's) / Members of Parliament (MP's) / Regional Assembly Members	Local Councillors
Care and Social Services Inspectorate Wales (CSSIW)	Welsh Language Commissioner
Rhieni dros Addysg Gymraeg (RHAG)	Neighbouring Primary and Secondary schools in the Vale of Glamorgan
Estyn	Central South Consortium Joint Education Service
Welsh Government Ministers	Trades Unions
Local Police and Crime Commissioner	Directors of Education – All Neighbouring Authorities
Council's Transportation Department	Diocesan Directors of Education

**Table 4 - List of groups to consult as part of the consultation process**

## How will you achieve the proposed changes?

The consultation period for the proposal started on 1 February 2022 and ended on 15 March 2022.

Within 13 weeks of 15 March 2022 a consultation report will be published on the Council's website. Hard copies of the report will also be available from the school office on request. The report will summarise the issues raised by consultees during the consultation period and responses to these issues. The report will also contain Estyn's view of the proposals. In May 2022, the Governing Body will consider the consultation report and decide whether or not to proceed with the proposals.

If the Governing Body decides to continue with the proposals it must publish a statutory notice.

The Council's proposals mean that all pupils, staff, and governors would move to the new school site in September 2023.

## Who will deliver the proposal?



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Subject to the approval of this proposal, a significant capital investment will be made to establish a new school building for St Nicholas CIW Primary.

This building would be delivered by the Sustainable Communities for Learning team within the Directorate of Learning & Skills as part of the Councils School Investment Programme following its successful bid for funding as part of the Sustainable Communities for Learning Programme. Projects are subject to statutory consultation and rigorous business cases as required by the School Organisation Code and Welsh Government. The Sustainable Communities for Learning Programme is a long-term strategic investment in educational estate throughout Wales. It is a unique collaboration between Welsh Government, the Welsh Local Government Association (WLGA), local authorities, colleges, and dioceses. All of the Vale of Glamorgan Council projects that were undertaken as part of Band A of the Sustainable Communities for Learning Programme were completed on time and on budget.

### **How will you know whether you have achieved the proposal's purpose?**

The Council would have determined the proposal to:

- Provide nursery provision at St Nicholas CiW Primary School by changing the lowest age range of pupils at St Nicholas CiW Primary School from 4 to 3, to include 24 part time nursery places

The Council may decide to approve, reject, or approve the proposals with modifications. In doing so, the Council will take into account any statutory objections that it has received.

## **5. What evidence are you using?**

### **Engagement (with internal and external stakeholders)**

The consultation process followed Welsh Government guidelines, in compliance with the Schools Standards and Organisation (Wales) Act 2013 and School Organisation Code 2018. The Council consulted with a range of statutory consultees outlined in and required by the Code.

Prior to the consultation, a meeting was held with the Headteacher of St Nicholas CIW Primary and representatives from the governing body to discuss the proposal and respond to queries raised. The Council arranged tours with the school's staff and governing body of comparable primaries completed within Band A to provide context of the proposed new building. The Council also held formal meetings with staff and the governing body to present the proposal and respond to queries.

Consultation was undertaken at a formative stage and allowed for intelligent consideration and response. The timescales for consultation comply with the School Organisation Code and allowed 7 weeks for consultees to consider and prepare a

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response. A number of themes received in as part of the process will be addressed and contained within a consultation report to be reported to Council on the proposal. The Council has a statutory duty to publish a consultation report on the proposal.

The Council held drop in sessions and invited parent and community stakeholders to attend as part of the process. Feedback from the drop in sessions are not included in the consultation response report as it was stated clearly in the consultation document that the Council would only accept responses using the official consultation response form. Consultees were advised of this at the drop in sessions.

### **Consultation (with internal and external stakeholders)**

The consultation processes followed Welsh Government guidelines, in compliance with the Schools Standards and Organisation (Wales) Act 2013 and School Organisation Code 2018. The Council consulted with a range of statutory consultees outlined in and required by the Code.

Formal consultations were conducted through a consultation document and response form distributed electronically to prescribed consultees and published on the school's and Vale of Glamorgan Council's websites on the 1 February 2022.

The bilingual consultation documents were published on 1 February 2022 and distributed online; through social media, and on the Vale of Glamorgan Council's website. Consultees were provided with an electronic copy of the documents and a link to the Vale of Glamorgan Council website. Hard copies were available at the school and also at all of the consultation events.

Consultees for the consultations were asked for their opinion on a key question:

- Do you support the proposal to change the lowest age range for the school from 4 to 3 to provide nursery provision from September 2023?

Consultees were also offered the opportunity to comment further:

- If you would like to suggest any changes or alternatives to the proposals, please detail these below.
- Any other comments?

Meetings for the consultation were held with the staff and governors at St Nicholas CIW Primary which were attended by Council officers. Two drop in sessions were held for all stakeholders in St Nicholas CIW Primary. A consultation session was undertaken with the School Council of St Nicholas CIW Primary to engage the pupils in the consultation process.

The consultation processes gave a range of consultees and local people the opportunity to learn about the proposal and for the Council to hear the views of all those with an interest so that they can be taken into account before any decisions are made. The

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number of respondents and characteristics thereof are detailed in the consultation response report.

The authority received 4 individual responses by the consultation closing date of 15 March 2022. Of the total 4 individual responses received 3 were in favour of the proposal and 1 were opposed. The Council will also include the responses received to the consultation exercises carried out with pupils of St Nicholas CIW Primary within the consultation response report.

## National data and research

A great deal of information is available with relation to the population within the Vale of Glamorgan. This can be accessed from the following sources.

Household projections by local authority <https://gov.wales/sites/default/files/statistics-and-research/2020-08/subnational-household-projections-local-authority-2018-based-272.pdf>

Future population trends <https://gov.wales/sites/default/files/publications/2021-12/future-trends-report-wales-2021-narrative-summary.pdf>

ONS 2016 population estimates <https://gov.wales/mid-year-estimates-population-2020>

Protected characteristic data from 2011 Census  
<https://gov.wales/statistics-and-research/census-population/?lang=en>

The Council's proposal will be delivered through the Welsh Government Sustainable Communities for Learning Programme. The Sustainable Communities for Learning Programme is a long-term strategic investment in educational estate throughout Wales. It is a unique collaboration between Welsh Government, the Welsh Local Government Association (WLGA), local authorities, colleges, and dioceses. All of the Vale of Glamorgan Council projects that were undertaken as part of Band A of the Sustainable Communities for Learning Programme were completed on time and within budget. The Council is expected to receive Welsh Government Band B match funding through the Sustainable Communities for Learning Programme for the proposal.

Changes to school provision, in the form of statutory school organisation proposals, are often necessary as part of local authority plans within the Sustainable Communities for Learning and Education Capital Programme.

The School Standards and Organisation (Wales) Act 2013 requires that the Welsh Ministers issue a School Organisation Code. The School Organisation Code 2018 sets out requirements for consultation upon and publication of statutory proposals for change and local authorities are required to follow the Code. The Code sets out requirements and provides guidance in respect of school re-organisation proposals brought forward to reconfigure school provision and for those responsible for determining proposals. The consultation process follows Welsh Government guidelines outlined in the School Organisation Code.

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## Local data and research

The Council is using current demographic, school, and pupil data to inform the proposal. A strategic review of data was used to inform the process.

St Nicholas CIW Primary is a Voluntary Controlled school serving 4 to 11 year olds in St Nicholas and Bonvilston. In terms of admissions, there are 18 pupils per year group with a total capacity of 126 pupils.

St Nicholas CIW Primary School is a timber clad building which has been categorised as being of poor condition and suitability. This means the school is exhibiting major defects and teaching methods are adversely affected. It would not be possible to refurbish teaching areas to fully meet 21st century standards. The school is split over two sites with reception pupils having to walk to the nearby 'Old School' following morning assembly. There is no path along this stretch of road. Classroom sizes are inconsistent throughout the building.

The buildings do not meet Sustainable Communities for Learning design guidance standards for primary schools which have been used for all new builds completed through the Council's Sustainable Communities for Learning programme. These schools comprise a fully accessible one or two storey building providing all the required educational functions within a single building set in grounds meeting current outdoor curriculum needs.

The Vale of Glamorgan Local Development Plan (LDP) 2011-2026 provides the local planning policy framework for the Vale of Glamorgan and was adopted by the Council on 28 June 2017.

A number of large scale housing developments are planned for the Vale of Glamorgan area. Planning permission has been granted for 117 dwellings to the east of St Nicholas and 120 dwellings to the east of Bonvilston. These housing developments are situated within the catchment area for St Nicholas CIW Primary School. The development in total is projected to yield around 24 nursery and 66 primary school pupils.

A new 126 place school building with 24 part-time nursery places would accommodate the projected increase in pupil numbers from the new developments.

## 6. [How robust is the evidence?](#)

### Does it show what the impact will be (positive and negative)?

This proposal pays due regard to the need to eliminate discrimination, advance equality, and foster good relations as an integral part of the decision making process. The impact of the proposal will be positive in terms of managing the demand for school places in the Vale of Glamorgan and in the St Nicholas and Bonvilston area and ensuring that pupils within an extended age range can receive education. The proposal may also be positive for those children attending St Nicholas CIW Primary who live in the St Nicholas and Bonvilston area, particularly those from the new housing developments.

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There may be a negative impact in terms of potential disruption during the construction phase. A part of the school site would not be accessible during construction. The school would work closely with the construction team to limit disruption. The Construction Environment Management Plan which outlines the construction phases identifies that the Multi Use Games Area would be developed first allowing access to hard play area for the pupils. Additionally a large area of the playing fields would not be within the construction phase and will be accessible.

## **What are the gaps?**

The protected characteristics of future new residents emanating from the proposed new development are unknown at this stage. There is limited information held within the Directorate of the protected characteristics of the staff and governing body however the proposal is designed to have a positive or neutral impact on those with protected characteristics accessing the new building. As the staff and governing body are small in number, this data may also serve to identify individuals and personal information held about them. However as part of the consultation several opportunities via a variety of confidential methods were given to staff and governors to express concerns with relation to their personal circumstances as well as any wider concerns. No issues were raised during the consultation or subsequently that were considered to have an adverse impact on the protected characteristics of staff or governors. As a result this is not included in this assessment.

The Council would ensure that all staff and governors would not be adversely impacted as a result of their protected characteristic as a result of this proposal.

## **What will you do about this?**

Consideration of the protected characteristics of the pupils, staff and Governing Body would be reflected in the development of the new building for example via the provision of a fully accessible building and gender neutral toilets.

The protected characteristics of future occupiers of the school cannot be known however the new building would ensure equality of opportunity for all those accessing the new building.

Information is provided to the school by the parents and professionals on the child's enrolment at the school. This allows the school to ensure that the school can meet their needs.

## **What monitoring data will you collect?**

The Pupil Level Annual School Census (PLASC) data is collected on an annual basis, protected characteristics are captured through this process.

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## How often will you analyse and report on this?

The pupils Level Annual School Census (PLASC) is completed annually. The Council and schools use the data to develop and monitor policy and performance in the Vale of Glamorgan. The effectiveness of this proposal will be monitored via the school's governing body, the Council, the Central South Consortium and Estyn.

## Where will you publish monitoring data and reports?

School Census is published by Welsh Government on the STATS Wales website for each local authority area.

<https://statswales.gov.wales/Catalogue/Education-and-Skills/Schools-and-Teachers/Schools-Census>

There would be continued monitoring of school standards across all year groups by the governing body, the Local Authority, and the Central South Consortium and via Estyn.

Standards in schools are monitored on an annual basis by the Consortium and reported back to the Local Authority. Standards for children who have been identified with additional learning needs, along with those children identified as school action and school action plus will also be part of the Annual National Categorisation School Report carried out by the Central South Consortium in partnership with the school.

## 7. [Impact](#)

### Is there an impact?

There would be a positive impact on persons with the protected characteristics of age, disability, gender reassignment and identity, religion/belief, and human rights. The proposal would support the school to ensure that it has the improved facilities to promote equality of opportunity and foster good relations between those with different protected characteristics.

There has been no perceived negative impact on the protected characteristics identified. The existing site is not fully compliant with the requirements of the Equality Act 2010 due to site constraints. Successful implementation of the proposal would enable compliance by providing a fully accessible building with gender neutral facilities.

The positive impacts are outlined below in the relevant section.

**If there is no impact, what is the justification for thinking this? Provide evidence.**

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Evidence is assessed through the consultation process and through school and pupil data.

## If there is likely to be an impact, what is it?

### Age

According to the Pupil Level Annual School Census (PLASC) carried out in January 2021 there were 121 children on roll of compulsory school age. 50 children were aged 4–7 and 71 children were aged 8–11.

The proposal would provide a 126 place primary school building with a 24 part time place nursery class. This proposal would develop continuity and progression in children's learning from the age of three. A consistent approach to the planning and delivery of the foundation phase (nursery to year two) would be enhanced through a purpose build nursery unit with access to outdoor learning areas. Provide a consistent approach from 3-11 years to promote and underpin continuity and progression for pupils, ensuring breadth and balance across the curriculum. The already well-developed holistic approach could be embedded from an early age.

As a new school on the existing site would be of sufficient size to provide the required places for children of nursery and primary school age who will be residing in the area, the proposal would provide a **positive** impact for children of these age brackets. The school would be able to provide sufficient places for primary school age children that would not be available without the new school building.

However, it is noted that section 149, so far as relating to age, does not apply to the exercise of a function relating to the provision of education to pupils in schools (see paragraph 1 of Schedule 18 to the 2010 Act).

### Disability

The data held on pupils is characterised by Special Educational Needs (SEN) not disability. 29.7% of children attending St Nicholas CIW Primary have SEN which is higher than the average (14 %) for the Vale of Glamorgan Primary School population. This will include pupils with a disability however it will also include pupils without a disability. There are no pupils with a disability which impacts on their mobility currently on roll at the school. The degree of need varies across a range of additional learning needs types including:

Additional Learning Needs (ALN) Groups
ASD (Autistic Spectrum Disorder)
BESD (Behavioural, emotional, and social difficulties)
DYSL (Dyslexia)
GLD (General Learning Difficulties)

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MLD (Moderate Learning Difficulties)
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SLCD (Speech, Language and Communication Difficulties)
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The school does not have an attached specialist resource base (SRB); it provides specialist support for children who have identified needs in an inclusive setting within the school.

The proposed new school building would be designed in such a way as to equip staff to meet the needs of learners with additional learning needs. The school would provide a targeted and bespoke curriculum which is responsive to the individual child's abilities and ensures that all children who require additional support are integrated across all areas of the curriculum.

It has been recognised that some parents may have selected St Nicholas CIW Primary due to a preference for a smaller school to support their child's individual needs. As the Council is not proposing to close the school, the staff would remain unchanged and would be very aware of the individual needs of pupils. All staff, governors and pupils would be in a position to liaise with the Council's Sustainable Communities for Learning team at the design stage in order to ensure that the learning environment is supportive of all pupils, including those who benefit from a quieter learning environment.

There are many design elements that could be incorporated to support pupils. These could include, for example a small room between a pair of classrooms which could be used for individual / small group learning or could be used as a breakout space should a pupil need to retreat from the classroom. Creative use of acoustic materials and bespoke calming colour schemes etc. would also be considered by part of the design team in full consultation with staff pupils and governors. The school will be designed to have flexible spaces which could be adapted by the use of furniture for specific activities, which would include quiet areas for individual learning. The building will be designed to current acoustic standards (BB93). This will define the acoustic performance standard that the school will be designed to. The whole building will be designed to comply with current building regulations for disabled access, with parking and access into the school building as well as assess throughout the school. Natural daylighting and ventilation will be a key feature of the new learning environment.

The protected characteristics of children who will emanate from the new developments in St Nicholas and Bonvilston are unknown at this stage. This data is collected where appropriate on admission and the Council and schools use the data to develop and monitor policy and performance in the Vale of Glamorgan. The effectiveness of this proposal will be monitored via the school's governing body, the Council, the Central South Consortium and Estyn.

Based on the policies in place that would not change as a result of the move to a new school building, staff would continue to receive protection under the Equalities Act 2010 which would be referred to by the governing body and Council in order to support the staff at the school and all people accessing the building will benefit from its accessible nature.

The proposal will therefore provide a **positive** impact for pupils, staff, governors, and the wider community visiting the school who have been identified within this protected group



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as they will have access to a fully accessible school building which has been designed to consider individual needs and will be managed by existing senior leaders at the school.

## **Gender reassignment, including gender identity**

Gender reassignment is not recorded for Primary age pupils however individual pupils choosing to live other than at their birth gender are supported within Primary Schools. All children would continue to receive a high quality education at the new school site. The new building would have suitable facilities in place to accommodate pupils of any gender; no pupil would need to consider changing schools due to gender reassignment. Pupils and staff have the right to access the toilet that corresponds to their gender identity. Any pupil or staff member who has a need or desire for increased privacy, regardless of the underlying reason, would be provided access to a single stall toilet, but no pupil or staff member shall be required to use such a toilet. The new building would provide single stall toilets that can be used by all, albeit separate facilities would be available for adults and children.

The use of changing rooms by transgender pupils and staff would be assessed on a case by-case basis in discussion with the individual concerned. The school would maximise social integration and promote an equal opportunity to participate in physical education classes and sports, ensuring the safety and comfort, and removing adverse impact for the individual. In most cases, transgender pupils or staff would have access to a changing space that corresponds to their gender identity.

Staff would also have access to improved, gender neutral facilities and would continue to receive protection under the Equalities Act 2010 which would be referred to by the governing body and Council in order to support the staff at the school. Non-binary people, including staff, governors and members of the community accessing the facilities would benefit from the gender neutral adaptations to the school that have been identified above.

None of the respondents indicated that this proposal would have an adverse impact on their gender identity. Based on current evidence this proposal would have a **positive** impact on this protected group.

## **Marriage and civil partnership (discrimination only)**

None of the respondents indicated that this proposal would have an adverse impact on their status in this regard. This information is not held at a directorate level for staff and governors however the proposal is designed to have a positive or neutral impact on those with protected characteristics accessing the new building. Pupils at the school are below the legal marriage age. Staff would continue to receive protection under the Equalities Act 2010 which would be referred to by the governing body and Council in order to support the staff at the school.

Based on the policies in place that would not change as a result of the transfer to a new school building, this proposal would have a **neutral** impact on this protected group.

## **Pregnancy and Maternity**

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It is considered that there will not be a negative impact on pupils in this protected group as there is a minimal likelihood of pupils falling within this protected group due to the age range of the school. The provision of education for any pupil who were within this protected group would remain unaltered by the proposal.

Staff who are currently on maternity leave or are pregnant at the point of the proposed move would be protected under the Equalities Act 2010.

None of the respondents indicated that this proposal would have an adverse impact on their status in this regard however reference to the impact, both positive and negative, on future children was made in a small number of responses. Based on the policies in place that would not change as a result of the proposal, this proposal would have a **neutral** impact on people in this protected group.

### **Race**

The predominant ethnicity at St Nicholas CIW Primary is currently White – Welsh/English/Scottish/Northern Irish British with 86% of children falling within this category. This is lower than the average (90% White British) across the wider Vale Primary School population.

As the children will be moving to a new school building, it is unlikely that the proposal will change the ethnic profile of the school although the characteristic of children emanating from the new development in St Nicholas and Bonvilston being built at this time is unknown at this stage.

All staff, pupils and governors would continue to receive protection under the Equalities Act 2010 which would be referred to by the governing body and Council in order to support the staff at the school.

None of the respondents indicated that this proposal would have an adverse impact on their status in this regard. Based on the policies in place that would not change as a result of the proposal and the very small number of pupils in this category, this proposal would have a **neutral** impact on people in this protected group.

### **Religion and belief**

Staff would continue to receive protection under the Equalities Act 2010 which would be referred to by the governing body and Council in order to support the staff at the school.

Respect for all religious and non-religious beliefs would not change due to this proposal. This school is a Voluntary Controlled school and the aspect of the curriculum relating to religion and belief would not change as a result of this proposal.

St Nicholas CIW Primary School is one of the seven Church in Wales primary schools. This proposal would increase the school's capacity from 126 places to 138 places (including full time equivalent nursery places) resulting in an additional 12 Church in Wales school places.

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St Nicholas CIW Primary School would maintain its religious ethos whilst catering for a larger number of pupils. Governors welcome applications for admission from a range of backgrounds and admissions criteria does not require identification of religion.

None of the respondents indicated that this proposal would have an adverse impact on their status in this regard. Provision for Church in Wales education would increase, meaning the proposal would have a **positive** impact on people in this protected group.

### Sex

The school currently has 48.6% (59) female pupils on roll and 51.4% (62) male. This is a similar percentage to the Vale wide primary pupil population (49% female and 51% male), therefore there would be no perceived negative impact. The staff population is 69.7% female and 30.3% male, compared with a Vale wide profile of 89.7% female and 10.3% male staff in Primary Schools.

Children of both sexes would be treated and taught equally in the school at its new site. There would be no different methods of teaching or curricula for either sex. The school would aim to reduce - as far as possible - segregating pupils and students by Gender. Pupils would continue to be supported to enable equal access to PE and where lessons are segregated by sex/gender they would be enabled to participate in the activity which corresponds to their gender identity if this is what they request. The aspect of the curriculum management relating to any identified gender based attainment gap would not change as a result of this proposal.

Staff would continue to receive protection under the Equalities Act 2010 which would be referred to by the Governing body and Council in order to support the staff at the school. This proposal would lead to an increase in employment opportunities at the school as additional pupil numbers would lead to growth in future staffing levels. This may lead to more employment opportunities for people of either sex.

None of the respondents indicated that this proposal would have an adverse impact on their status in this regard. Based on the policies in place that would not change as a result of the proposal, this proposal would have a **neutral** impact on people in this protected group.

### Sexual orientation

Inclusivity and respect of others is an intrinsic element of the national curriculum. The principles of school inspection as described in the 'Framework for School Inspection', September 2015 states that the inspection will focus on the needs of pupils and parents by evaluating the extent to which schools provide an inclusive environment which meets the needs of all pupils irrespective of age, disability, gender reassignment, race, religion or belief, sex, or sexual orientation. The Estyn School Inspection Handbook also details how inspection will evaluate how well individual pupils benefit from the school and states it may be relevant to pay particular attention to those with protected characteristics, therefore including transgender pupils. Under spiritual, moral, social, and cultural development Estyn will look for evidence where pupils develop awareness and respect

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for diversity in relation to, for example gender, race, religion and belief, sexual orientation, and disability.

Inspectors will also consider types, rates and patterns of bullying and the effectiveness of the school's actions to prevent and tackle all forms of bullying and harassment – this includes cyber bullying and prejudice-based bullying related to special education need, sexual orientation, sex, race, religion and belief, gender reassignment or disability.

Staff would continue to receive protection under the Equalities Act 2010 which would be referred to by the governing body and Council in order to support the staff at the school.

Based on the policies in place that would not change as a result of the proposal, this proposal would have a **neutral** impact on people in this protected group.

## Welsh language

Parental demand for Welsh medium primary education will continue to be provided through the catchment area school Ysgol Iolo Morgannwg.

St Nicholas CIW Primary is an English medium school and this proposal does not seek to change this. The Council was very successful in increasing Welsh medium primary sector capacity within the Vale of Glamorgan under Band A of the 21st Century Schools Programme. In order to build on this success, a key priority for Band B is to increase capacity in the Welsh medium secondary sector as well as consideration of further developments at primary level. In order to ensure that the Council actively addresses the Welsh Government target of one million Welsh speakers by 2050, the Council will be undertaking an active programme of addressing need with regard to Welsh and English medium education.

Staff would continue to receive protection under the Equalities Act 2010 which would be referred to by the governing body and Council in order to support the staff at the school.

None of the respondents indicated that this proposal would have an adverse impact on their status in this regard. Based on current evidence, this proposal would have a **neutral** impact on people in this protected group.

## Human rights

Consideration of the UNICEF document, A Human Rights-Based Approach to Education For All was given as part of the development of this consultation. This document advises that Chapter 2 introduces a conceptual framework for the rights-based approach to education that embodies three interlinked and interdependent dimensions. It contends that human rights related to education cannot be realized unless and until all three are addressed:

- The right of access to education – the right of every child to education on the basis of equality of opportunity and without discrimination on any grounds. To achieve this goal, education must be available for, accessible to and inclusive of all children.

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- The right to quality education – the right of every child to a quality education that enables him or her to fulfil his or her potential, realize opportunities for employment and develop life skills. To achieve this goal, education needs to be child-centred, relevant and embrace a broad curriculum, and be appropriately resourced and monitored.
- The right to respect within the learning environment – the right of every child to respect for her or his inherent dignity and to have her or his universal human rights respected within the education system. To achieve this goal, education must be provided in a way that is consistent with human rights, including equal respect for every child, opportunities for meaningful participation, freedom from all forms of violence, and respect for language, culture, and religion.

This proposal has been presented in order to address the right of access to education, the right to quality education and the right to respect within the learning environment for all pupils within the Vale of Glamorgan.

Moving the school to improved accommodation with sustainable numbers would:

- Enable the school to further improve while catering for a greater pupil population.
- Ensure that the environment was accessible for all
- Provide innovative and creative learning environments which are adaptable to change and will challenge and support children to reach their full potential.
- Increase the level of community access and interaction through the use of the school's educational facilities whilst meeting the needs of the school.
- Establishing a new building and site offers a more efficient and sustainable model of delivery of education for the 21st Century that meets national building standards and reduces the recurrent costs and carbon footprint of education buildings. The new building will meet BREEAM (Building Research Establishment Environmental Assessment Method) Excellent standards and be built to an EPC (Energy Performance Certificate) A rating.
- Develop the ethos and culture of the school in children from an earlier age, leading to effective interpersonal relationships and higher self-esteem.
- All curriculum planning and resourcing would build successfully on previous pupil knowledge and experience and engage interest.
- Support pupils to develop their ability to learn new skills and apply their subject knowledge more positively and creatively across a continuum of learning.
- Improve the already good arrangements for the care, support, and guidance of pupils from an earlier age.
- Extend and develop partnerships with families from the earliest opportunity to strengthen home / school transition.

It is not anticipated that there would be any adverse impacts for staff as they would simply move to a new building on their existing contracts. This proposal would lead to an increase in employment opportunities at the school as additional pupil numbers would lead to growth in future staffing levels. If the move to a new school site takes place, the governing body and headteacher would need to consider an increase in the staffing structure for the additional pupil numbers from September 2023. Any proposed changes

## Equality Impact Assessment

to staffing would be subject to full consultation with staff and the relevant trades unions where necessary.

The Vale of Glamorgan Council fully supports the governors, headteacher and staff at the school with any employment related matters. The school has access to the Council's Human Resources policies and procedures, including recruitment policies. The Human Resources service works closely with governors to ensure regular and clear communication with all employees takes place on all matters relating to a change in location of their workplace.

None of the respondents indicated that this proposal would have an adverse impact on their status in this regard. Based on current evidence, this proposal would have a **positive** impact on people in this protected group.

### How do you know?

**Explain this for each of the relevant protected characteristics as identified above.**

Data is provided and analysed through the Pupil Level Annual School Census data collected in the January of each year. The Council also uses current demographic, school, and pupil data to inform the proposal. The staff would also continue to receive protection under the Equalities Act 2010 which would be referred to by the governing body and Council in order to support the staff at the school.

### What can be done to promote a positive impact?

**Explain this for each of the relevant protected characteristics as identified above.**

The availability of the school, its benefits, and the facilities available will be published on the Council's website and through the Council's Parental Guide to School Admissions for parents to consider when making a decision on where to express a preference for a pupil place. Having due regard to the need to advance equality of opportunity includes having due regard to the need to remove or minimize disadvantages suffered by them. Due regard would therefore be paid to the need to take steps to meet the needs of such persons where those needs are different from persons who do not have that characteristic, and to encourage those who have a protected characteristic to participate in public life. The steps involved in meeting the needs of disabled persons include steps to take account of the persons' disabilities would be key to the design of the new building. Having due regard to 'fostering good relations' involves having due regard to the need to tackle prejudice and promote understanding. This is an important aspect to curriculum delivery and would not change as a result of this proposal.

It is acknowledged that complying with the duty may involve treating some people better than others, as far as that is allowed by the discrimination law.

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## **Age**

As the school would continue to provide sufficient places for children of primary school age. Inclusivity and respect of others is an intrinsic element of the national curriculum.

## **Disability**

St Nicholas CIW Primary's buildings do not meet Sustainable Communities for Learning design guidance. This new building would be designed to ensure it was fully accessible to all, regardless of the nature of their disability.

As stated previously design elements would be incorporated to support pupils such as a small room between a pair of classrooms which could be used for individual / small group learning or could be used as a breakout space should a pupil need to retreat from the classroom. The school would be designed to have flexible spaces which could be adapted by the use of furniture for specific activities, which would include quiet areas for individual learning. The school would be designed to current acoustic standards (BB93); this will define the acoustic performance standard that the school will be designed to. The whole building will be designed to comply with current building regulations for disabled access, with parking and access into the school building as well as assess throughout the school. Natural daylighting and ventilation will be a key feature of the new learning environment.

Inclusivity and respect of others is an intrinsic element of the national curriculum. The proposal would provide a positive impact.

## **Gender reassignment, including gender identity**

All children would be supported to receive a high quality education if the proposal were to be successfully implemented regardless of gender identity. The school will have suitable facilities in place to accommodate pupils of any gender; no pupil or staff member would need to consider changing schools due to gender reassignment.

Inclusivity and respect of others is an intrinsic element of the national curriculum. The proposal would provide a positive impact.

## **Marriage and civil partnership**

Staff would continue to receive protection under the Equalities Act 2010 which would be referred to by the governing body and Council in order to support the staff at the school.

Inclusivity and respect of others is an intrinsic element of the national curriculum. The Council will ensure that the school promotes this requirement through its monitoring and challenge carried out by the school improvement service and Human Resources.

## **Pregnancy and Maternity**

Staff would continue to receive protection under the Equalities Act 2010 which would be referred to by the governing body and Council in order to support the staff at the school.

# Equality Impact Assessment

Inclusivity and respect of others is an intrinsic element of the national curriculum. The Council will ensure that the school promotes this requirement through its monitoring and challenge carried out by the school improvement service and Human Resources.

## **Race**

Inclusivity and respect of others is an intrinsic element of the national curriculum. The Council will ensure that the school promotes this requirement through its monitoring and challenge carried out by the school improvement service and Human Resources.

## **Religion and belief**

Inclusivity and respect of others is an intrinsic element of the national curriculum. The Council will ensure that the school promotes this requirement through its monitoring and challenge carried out by the school improvement service and Human Resources.

## **Sex**

Children of both sexes would continue to be treated and taught equally in the new school building. There would be no different methods of teaching or curricula for either sex. Inclusivity and respect of others is an intrinsic element of the national curriculum. The Council will ensure that the school promotes this requirement through its monitoring and challenge carried out by the school improvement service and Human Resources.

## **Sexual orientation**

Staff would continue to receive protection under the Equalities Act 2010 which would be referred to by the Governing body and Council in order to support the staff at the school.

Inclusivity and respect of others is an intrinsic element of the national curriculum. The Council will ensure that the school promotes this requirement through its monitoring and challenge carried out by the school improvement service and Human Resources.

## **What can be done to lessen the risk of a negative impact?**

**Explain this for each of the relevant protected characteristics as identified above.**

No negative impacts have been identified as a result of this proposal.

## **Is there a need for more favourable treatment to achieve equal outcomes? (Disability only)**



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The current facilities are not fully accessible and this would be addressed positively as part of this proposal. The building will be designed to be fully accessible. In addition, small classrooms, and quiet break out areas will be considered as part of the design plan in order to ensure that children requiring a quieter and less busy learning environment can be accommodated.

## Will the impact be positive, negative, or neutral?

Explain this for each of the relevant protected characteristics as identified above.

**Age – Positive**

**Disability – Positive**

**Gender reassignment, including gender identity – Positive**

**Marriage and civil partnership – Neutral**

**Pregnancy and Maternity – Neutral**

**Race – Neutral**

**Religion and belief – Positive**

**Sex – Neutral**

**Sexual orientation – Neutral**

**(Welsh language – Neutral**

**Human rights – Positive)**

Please see reasons outlined in the previous sections. In conclusion, there is no real risk of direct or indirect discrimination as the Council is pursuing a legitimate aim (namely, improving the capacity and efficiency of education) and the decision to publish the proposals to make a regulated alteration is a proportionate means of achieving that aim.

## 8. [Monitoring on-going impact](#)

### Date you will monitor progress

PLASC data is annual and if approved by cabinet a project plan for this proposal will be initiated. This will include reference to this document. Any changes in outcomes resulting from this ongoing analysis will be used to update this Equality Impact Assessment, including any mitigating actions which may be required.

### Measures that you will monitor

PLASC data for all pupils will be broken down and monitored by Age, Disability, Race, Religion and belief and Welsh language. The Equalities Team monitors service data and provides information in the annual equality monitoring report. The measures identified for

## Equality Impact Assessment

the education of pupils are a matter for the governing body in their School Improvement Plan.

### **Date you will review implemented proposal and its impact**

Subject to the Council's approval, the school would receive enhanced support and challenge in the year following its move as is the practice following all school re-organisations. This will be provided by the Council. Thereafter, the school will be subject to routine monitoring and challenge from the Central South Consortium, Estyn, and the Council.

The Vale of Glamorgan Council works closely with the governing bodies of schools to ensure that standards are robust, that teaching and learning is of a high quality and that leadership and governance is strong. The Council works with two organisations in order to monitor the performance of schools and to support school improvement.

Estyn is the office of Her Majesty's Chief Inspector of Education and Training in Wales. It is a Crown body, established under the Education Act 1992. Estyn is independent of the National Assembly for Wales but receives its funding from the Welsh Government under section 104 of the Government Wales Act 1998. Estyn inspects quality and standards in education and training providers in Wales.

The Central South Consortium Joint Education Service (CSCJES) was established in September 2012. The Local Authority works with the Consortium to support and challenge all schools in the Vale of Glamorgan.

Schools are inspected as part of a national programme of school inspection. The purpose of an inspection is to identify good features and shortcomings in schools in order that they may improve the quality of education offered and raise the standards achieved by their pupils (Estyn).

In September 2017, a new Estyn School Common Inspection Framework was introduced for all schools across Wales. St Nicholas CIW Primary was last inspected in January 2017 under Estyn's previous School Inspection Framework which evaluates a provider's effectiveness using a four-point judgement scale.

# Equality Impact Assessment

## 9. [Further action as a result of this equality impact assessment](#)

Possible Outcomes	Say which applies
No major change	Yes
Adjust the policy	
Continue the policy	
Stop and remove the policy	

## 10. [Outcomes and Actions](#)

Recommend actions to senior management team
Outcome following formal consideration of proposal by senior management team

## 11. [Important Note](#)

Where you have identified impacts, you must detail this in your Cabinet report when seeking approval for your proposal.
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## 12. [Publication](#)

Where will you publish your approved proposal and equality impact assessment? The Council's website
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## 13. [Authorisation](#)

Approved by (name)	Paula Ham
Job Title (senior manager)	Director of Learning and Skills
Date of approval	28 <sup>th</sup> April 2022
Date of review	