

THE VALE OF GLAMORGAN COUNCIL

LEARNING AND CULTURE SCRUTINY COMMITTEE: 10TH NOVEMBER, 2022

REFERENCE FROM CABINET: 20TH OCTOBER, 2022

“C106 UPDATE ON THE COMMUNITY BENEFITS AND SUSTAINABILITY OUTCOMES OF BAND B OF THE SUSTAINABLE COMMUNITIES FOR LEARNING PROGRAMME (EAWL) (SCRUTINY – LEARNING AND CULTURE) –

The report sought to provide Cabinet with an update on the community benefits and sustainability outcomes of Band B of the Sustainable Communities for Learning programme to date.

The report provided an update on high level targets and examples of community benefits delivery by the Sustainable Communities for Learning team and the appointed contractors (Bouygues, ISG and Morgan Sindall) and consultants (AECOM) of the Barry Secondary Learning Communities (BSLC), Centre for Learning and Wellbeing, Expansion of Ysgol Y Deri, Cowbridge Primary Provision and Western Vale Primaries (WVP) projects.

Between January 2019 to August 2022 the Band B projects had delivered the following:

- o Over 12,500 person weeks of New Entrant Jobs with 158 new full-time jobs;
- o Over 7,000 person weeks of New Entrant Training, including 104 apprenticeships and 32 work experience placements;
- o Over 3,000 hours of school STEM engagements, reaching over 11,000 pupils;
- o 6 supply chain engagement events;
- o An average of 99% of construction waste avoiding landfill; and
- o An average of 82% construction spend within Wales, with 85% of subcontractors based in Wales and 50% of the workforce coming from the local postcode.

The report also provided an update on how the Sustainable Communities for Learning programme was considering and implementing sustainability within its current schemes and future work to be delivered by 2024.

All new build schools were designed to meet BREEAM Excellent standard which included delivering energy efficient buildings and enhancing habitats for wildlife. From January 2022, all new school buildings would also be net zero carbon in operation, with aims to improve embodied carbon year on year.

The Sustainable Communities for Learning programme monitored a range of sustainability outcomes post occupancy; including educational attainment, energy consumption, and community use of facilities.

The Council had also been working on a process to approach sustainability more holistically and in particular to decarbonise new school buildings with consideration of the whole life cycle; the overarching aim was to achieve net-zero carbon in future projects.

To further embed sustainability and well-being, the Council had developed a directory in collaboration with Constructing Excellence in Wales, other industry partners and the Office of the Future Generations Commissioner to help integrate the Well-being of Future Generations (Wales) Act 2015 into the design and delivery process.

This was a matter for Executive decision.

Cabinet, having considered the report and all the issues and implications contained therein

RESOLVED –

- (1) T H A T the progress towards community benefits targets made by the Sustainable Communities for Learning team and the appointed contractors and consultants of the Barry Secondary Learning Communities and Western Vale Primaries schemes set out in the report be noted.
- (2) T H A T the sustainability measures already put in place within the Sustainable Communities for Learning programme and progress towards further measures to be implemented in future schemes be noted.
- (3) T H A T the report be referred to the Learning and Culture Scrutiny Committee for consideration with regards to the delivery of community benefits for existing and future Sustainable Communities for Learning schemes.
- (4) T H A T Cabinet write to each of the contractors, thanking them for their work and efforts in contributing to this incredibly successful scheme.

Reasons for decisions

- (1&2) Having regard to the contents of the report and discussions at the meeting.
- (3) To ensure the Learning and Culture Scrutiny Committee are updated on the progress made to date and for further consideration of future schemes.
- (4) To acknowledge the work carried out by the contractors on achieving those goals outlined within the report.”

Attached as Appendix: Report to Cabinet: 20th October, 2022

Meeting of:	Cabinet
Date of Meeting:	Thursday, 20 October 2022
Relevant Scrutiny Committee:	Learning and Culture
Report Title:	Update on the Community Benefits and Sustainability Outcomes of Band B of the Sustainable Communities for Learning programme.
Purpose of Report:	To provide Cabinet with an update on the community benefits and sustainability outcomes of Band B of the Sustainable Communities for Learning programme to date.
Report Owner:	Cabinet Member for Education, Arts and the Welsh Language
Responsible Officer:	Paula Ham, Director of Learning and Skills
Elected Member and Officer Consultation:	<p>Officers Consulted:</p> <p>Gemma Jones: Operational Manager - Accountancy</p> <p>Trevor Baker: Head of Strategy, Community Learning & Resources</p> <p>Lisa Lewis: Operational Manager, Strategy and Resources</p> <p>Nathan Slater: Project Manager, Sustainable Communities for Learning Committee Reports.</p>
Policy Framework:	This is a matter for Executive decision by the Cabinet
<p>Executive Summary:</p> <ul style="list-style-type: none"> • This report provides an update on high level targets and examples of community benefits delivery by the Sustainable Communities for Learning team and the appointed contractors (Bouygues, ISG and Morgan Sindall) and consultants (AECOM) of the Barry Secondary Learning Communities (BSLC), Centre for Learning and Wellbeing, Expansion of Ysgol Y Deri, Cowbridge Primary Provision and Western Vale Primaries (WVP) projects. • Between January 2019 to August 2022 the Band B projects have delivered the following: <ul style="list-style-type: none"> ○ Over 12,500 person weeks of New Entrant Jobs with 158 new full-time jobs; ○ Over 7,000 person weeks of New Entrant Training, including 104 apprenticeships and 32 work experience placements; ○ Over 3,000 hours of school STEM engagements, reaching over 11,000 pupils; 	

- 26 supply chain engagement events;
- An average of 99% of construction waste avoiding landfill; and
- An average of 82% construction spend within Wales, with 85% of subcontractors based in Wales and 50% of the workforce coming from the local postcode.
- The report also provides an update on how the Sustainable Communities for Learning programme is considering and implementing sustainability within its current schemes and future work to be delivered by 2024.
- All new build schools are designed to meet BREEAM Excellent standard which includes delivering energy efficient buildings and enhancing habitats for wildlife. From January 2022, all new school buildings will also be net zero carbon in operation, with aims to improve embodied carbon year on year.
- The Sustainable Communities for Learning programme monitors a range of sustainability outcomes post occupancy; including educational attainment, energy consumption, and community use of facilities.
- The Council has also been working on a process to approach sustainability more holistically and in particular to decarbonise our new school buildings with consideration of the whole life cycle; the overarching aim is to achieve net-zero carbon in future projects.
- To further embed sustainability and well-being, the Council has developed a directory in collaboration with Constructing Excellence in Wales, other industry partners and the Office of the Future Generations Commissioner to help integrate the Well-being of Future Generations (Wales) Act 2015 into the design and delivery process.

Recommendations

- 1.** That Cabinet note the progress towards community benefits targets made by the Sustainable Communities for Learning team and the appointed contractors and consultants of the Barry Secondary Learning Communities and Western Vale Primaries schemes set out in the report.
- 2.** That Cabinet note the sustainability measures already put in place within the Sustainable Communities for Learning programme and progress towards further measures to be implemented in future schemes.
- 3.** That Cabinet refer the report to the Learning & Culture Scrutiny Committee for consideration with regards to the delivery of community benefits for existing and future Sustainable Communities for Learning schemes.
- 4.** That Cabinet write to each of the contractors, thanking them for their work and efforts in contributing to this incredibly successful scheme.

Reasons for Recommendations

- 1.** To provide Cabinet with an update on high level targets and examples of community benefits delivery by the Sustainable Communities for Learning team and the appointed contractors and consultants of the Barry Secondary Learning Communities and Western Vale Primaries schemes.
- 2.** To provide Cabinet with an update on how the Sustainable Communities for Learning programme is considering and implementing sustainability within its current schemes and future work to be delivered by 2024.
- 3.** To ensure the Learning and Culture Scrutiny Committee are updated on the progress made to date and for further consideration of future schemes.
- 4.** To acknowledge the work carried out by the contractors on achieving those goals outlined within the report.

1. Background

- 1.1** 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 diocesan authorities.
- 1.2** On 9th September, 2022, Welsh Government wrote to the Council to confirm that the Council's revised Strategic Outline Programme had been approved. The revised programme provides the Council with an overall funding envelope of £181m for Band B of the Sustainable Communities for Learning Programme (which includes a proposed MIM revenue funded scheme). The Council's capital programme includes £149m for the capital element of the programme.
- 1.3** The Council's largest scheme is the Barry Secondary Learning Communities (BSLC) in which one refurbishment and two new secondary school buildings will

be delivered across Barry, with a total investment of £85.4 million. These schemes are:

- Ysgol Gymraeg Bro Morgannwg, £21.5 million refurbishment and extension of the existing school buildings. ISG Construction were appointed to deliver this scheme and the project is now complete.
 - Whitmore High School, £30 million new build school on the existing site. Morgan Sindall was appointed to deliver this scheme. The project is now complete
 - Pencoedtre High School, £33.9 million new build school on the existing site. Bouygues UK have been appointed to deliver this scheme. The new school building is complete, and the external works are underway to provide the outdoor sports facilities.
- 1.4** The Council has appointed ISG Construction to deliver the Western Vale Primaries project. This is a £17.355 million scheme which will deliver two new build 210 place primary schools and one 126 place primary school within the Western Vale. Two of these schools are complete (St David's CiW Primary School and South Point Primary School). St Nicholas CiW Primary School's pre-construction works are being finalised and construction is due to commence from November 2022.
- 1.5** In addition, the Council is also progressing the Transforming Additional Learning Needs Project which includes an expansion to Ysgol Y Deri (150 places) and the creation of the Centre of Learning and Wellbeing (60 places). This project represents a £29.9m investment, the expansion of Ysgol y Deri is in the design stages with construction anticipated to start in February 2023 with ISG appointed as the main contractor for Stage 1. The Centre for Learning and Wellbeing is under construction and the main contractor is Morgan Sindall.
- 1.6** Finally, the Council is progressing the project Cowbridge Primary Provision Phase 1 which is a £7.3m project to deliver 210 place primary school to create an All-through School on the Cowbridge Comprehensive site from 3 to 19 years old. This project is under construction and the contractor is Morgan Sindall.
- 1.7** The Council's Sustainable Communities for Learning programme aims to provide long-term social, environmental and economic benefits to schools and the wider community. To achieve these wider programme aims, our appointed contractors are required throughout the design and construction process to deliver on a range of community benefits targets.
- 1.8** Targets include using Welsh supply chains, supporting small local businesses, and offering opportunities for new entrants to gain skills and experience in construction through apprenticeships. School engagements are another key area, particularly the promotion of "STEM" (science, technology, engineering, and mathematics) through site visits and work experience. The wider community is also supported as local groups can apply for in-kind donations and volunteering time on projects.

2. Key Issues for Consideration

- 2.1** The Council is committed to achieving real results which have a long-term impact on individuals and the region in line with the Council's Corporate Plan. As such, the Council has adopted an innovative collaborative approach to deliver consistent and meaningful results across all projects. This collaborative approach is not normally found within construction projects of this nature as contractors would usually operate separately on community benefits and other matters.
- 2.2** In practice this means that monthly meetings are held by the Sustainable Communities for Learning team with all the contractors and cross-contractor communication is facilitated between community engagement officers. This helps to minimise duplication and maximise positive outcomes by sharing opportunities and approaches; for example, holding joint supply chain events and the creation of a standard work experience programme across all sites. The group also works on producing publications such as newsletters together to promote the community benefit outcomes and progress on projects within the Vale of Glamorgan.
- 2.3** In terms of high-level figures, between January 2019 and August 2022 the projects within Band B of the programme have delivered:
- Over 12,500 person weeks of New Entrant Jobs with 158 new full-time jobs;
 - Over 7,000 person weeks of New Entrant Training, including 104 apprenticeships and 32 work experience placements;
 - Over 3,000 hours of school STEM engagements, reaching over 11,000 pupils;
 - 26 supply chain engagement events;
 - An average of 99% of construction waste avoiding landfill; and
 - An average of 82% construction spend within Wales, with 85% of subcontractors based in Wales and 50% of the workforce coming from the local postcode.
- 2.4** The programme has delivered against the majority of community benefit targets. In most cases these have been exceeded. However, a number of projects were impacted by Covid-19, which restricted community, supplier and pupil engagements which could not be held during the pandemic. The contractors did adapt their practices to undertake virtual engagements where possible. However, these targets predominantly require face to face interaction to fulfil the intended aim of the target. To address this shortfall over the programme the contractors have increased the engagements on the outstanding projects to ensure over the whole programme the target is reached.
- 2.5** The Council ensures benefits are shared across the Vale of Glamorgan whilst also targeting specific support needed within local areas. For example, job opportunities are available to the whole county, but targeted job fairs have been held in certain areas within the Vale with higher levels of unemployment. Construction consultants AECOM (multi-disciplinary contractors working across all of the Vale's Sustainable Communities for Learning programme) and supply chain partners are also engaged in apprenticeships and work experience

requirements to enable training across a range of specialties which may not be usually considered by participants from socioeconomically deprived areas. Contractors have worked collaboratively to retain employment positions across the development programme for those locally unemployed. For example, a gate warden which was used on the Whitmore scheme has been moved to the Centre for Learning and Wellbeing following the completion of the Whitmore project to maintain a continuity of work for the employee.

- 2.6** The contractors are also working closely with the Council's Communities 4 Work programme, who sit on the wider steering group, and have successfully provided a number of work placement opportunities. For example, a service user of Communities 4 Work who had an interest and skills in computer programming was able to be linked with AECOM for work experience through the steering group. The individual was shown how to use the BIM system and following this work experience was able to successfully gain full time employment in a relevant field.
- 2.7** "Bocs boyd" has been developed with Ysgol y Deri, the Vale's special school, which will provide site catering for the three Barry Secondary Learning Community projects. Pupils from Ysgol Y Deri will gain first hand work experience in addition to their general studies on the site. A mobile canteen unit has been donated by Morgan Sindall to enable this function to be sustained after project completion. Bocs boyd and Ysgol Y Deri are also working with the Council's LATC (Big Fresh Catering) in developing paid work opportunities for young people. Since the completion of the majority of the Barry Secondary Learning Community, Bocs Boyd will continue on the Ysgol Y Deri expansion scheme once it starts on site.
- 2.8** Pupil engagements relating to the schools under development represents an opportunity for pupils to engage with the construction sector in theory and in practice. Construction site boundaries are implemented with viewing areas to allow pupils to view the progress on construction of the new school and areas within the contractor compound can be used to provide presentations and site walkarounds to pupils. Contractors have held several pupil engagements over the course of the development programme however, recent engagements have included the following:
- Engagement session undertaken for pupils attending the Centre of Learning and Wellbeing to see construction techniques on the site and to view the progress of the school.
 - Geology site visit was held for Cowbridge Comprehensive pupils to better understand groundworks and piling.
 - Presentation to Cowbridge Comprehensive pupils by structural engineer to outline and explain the initial construction phases and their relationship to ground conditions.
 - Practical workshop for St Nicholas CiW Primary School pupils on Roman Theolodite survey methods and how they have informed the current construction methods.

- 2.9** The Sustainable Communities for Learning programme also seeks to support projects, organisations, or social enterprises operating within the Vale of Glamorgan which improve outcomes for people, the environment, and/or the local economy through community benefits. A range of support is available and could include help with painting a community space, procurement advice, or training opportunities for service users.
- 2.10** Project applications are scored by a sub-group of volunteers from the community benefits steering group. Shortlisted applications are then discussed at the following contractors meeting and the contractors make the final decision on which projects they can support.
- 2.11** To date, three community gardening projects have been successful in both application stages; a food growing and sensory garden at Palmerston Adult Learning Centre, another community garden managed by the Council's Community Investment team and near Pencoedtre High School, named 'Everyone's Garden', and to tidy up the shared grounds at Ysgol Gwaun Y Nant and Oak Field primary. These projects mainly aimed to help with clearing scrub and creating garden areas. The project team revisited the secure planting area at Palmerston Centre for Lifelong Learning that was created at the start of 2021. The community has been busy growing food and flowers in the raised beds, and the users have commented they were happy with the facilities provided.
- 2.12** Community engagements and support will continue throughout the programme. Other recent community engagements have included:
- Creating habitat piles from the remains of trees which had been felled due to Ash dieback, cleared overgrown vegetation around the Mill, and collected litter from the beach at Porthkerry Country Park
 - Litter picking event at Rhoose Point collecting 9 bags of waste preventing it from being washed out to sea and trapping or poisoning wildlife.
 - Contractors have contributed to Butterfly Conservation's Big Butterfly Count in providing valuable data for a national campaign.
 - Penarth Beach Litter Clean organised by the Sustainable Communities for Learning Team in collaboration with Keep Wales Tidy. Pupils from local schools attended to help in the beach clean and a presentation on waste was given to explain the importance of waste management. ISG attended to volunteer their time in the beach clean.
- 2.13** Maintaining and enhancing the natural environment is another key driver within the programme. All new build schools being designed to meet BREEAM Excellent standard which includes delivering energy efficient buildings and enhancing habitats for wildlife. To date the contractors are achieving an average of 99% diversion of waste from landfill and have been providing waste audit information to the Sustainable Communities for Learning team for transparency.
- 2.14** The Sustainable Communities for Learning Team have produced an Ecology and Landscape Strategy which is used to inform the tender requirements for projects. This document sets out the minimum requirements for Contractors to deliver

ecological enhancements on schemes. This document has been created in collaboration with the Council's Ecology team and emphasises the use of local flora on schemes which are appropriate to their context and provide enhanced habitats for local fauna.

- 2.15** Sustainability is a key component of the Council's Sustainable Communities for Learning Programme to address challenges like decarbonisation, healthy ecosystems, and community cohesion.
- 2.16** On 29th July, 2019 the Vale of Glamorgan Council declared a 'climate emergency' and committed to reducing its carbon emissions to net zero before the Welsh Government target of 2030, supporting the implementation of the Welsh Government's new Low Carbon Delivery Plan. (Council minute 209)
- 2.17** In response to the declaration of a climate emergency, the Council developed several Band B schools to be low carbon in-use through additional renewables and piloting an all-electric solution. These measures were put in place for St David's CIW primary and Barry Waterfront Primary School.
- 2.18** Taking decarbonisation further, the Council built upon the low carbon school model to decarbonise our new school buildings with consideration of the net zero whole life cycle carbon. This process built upon and brings together principles from standards like BREEAM, PassivHaus, the Well-being of Future Generations (Wales) Act 2015 and the Community Benefits requirements from Welsh Government. The process includes utilising building modelling software to optimise building orientation for solar gain and PV placement, setting far higher targets than Part-L requirements for U values and air tightness, and requiring buildings to generate more energy than they consume (making them "carbon positive"). South Point Primary was the first net zero carbon in operation school in Wales and following the construction of the scheme Welsh Government have announced that all new schools will need to be net zero in operation from January 2022.
- 2.19** To further develop the net zero carbon model, the embodied and in-use carbon and energy from building materials is being investigated, along with a range of other sustainability factors like biodiversity, insulation value, transportation and waste, to find out where changes can be made in future projects to reduce environmental impacts from materials. The aim is to produce net zero carbon for the whole lifecycle of a school building from conception to demolition.
- 2.20** To further embed sustainability and well-being, the Council has developed a directory in collaboration with Constructing Excellence in Wales, other industry partners and the Office of the Future Generations Commissioner to help integrate the Well-being of Future Generations (Wales) Act 2015 into the design and delivery process. This involves actions within each stage of the project being monitored against the Well-being goals to ensure the well-being of current and future generations is considered throughout the programme by all stakeholders. The project stages are defined by the Royal Institute of British Architects (RIBA) Plan of Work and are known as RIBA Stages. An additional RIBA Stage 8 has been created to ensure the building's end of life scenario is planned for to encourage deconstruction and reuse of materials rather than traditional demolition. This

directory has been presented to other local authorities through the CLAW networking group and at a Sustainable Buildings event held by Cardiff University. This directory is being utilised by the Sustainable Communities for Learning projects within the Vale and throughout Wales. The directory template will be implemented for each project and independently audited. Further work on embedding the project directory into public construction practice is being funded by the Office of the Future Generations Commissioner and Constructing Excellence in Wales.

3. How do proposals evidence the Five Ways of Working and contribute to our Well-being Objectives?

- 3.1** The Well-being of Future Generations Act 2015 (“the 2015 Act”) requires the Council to think about the long-term impact of their decisions, to work better with people, communities, and each other and to prevent persistent problems such as poverty, health inequalities and climate change.
- 3.2** The Council has committed as part of the Corporate Plan 2020-2025 to achieving a vision of ‘Working Together for a Brighter Future’. This plan is reflective of the Welsh Government’s Well-being of Future Generations Act and is comprised of four Well-being objectives to deliver this vision:
- Objective 1 - To work with and for our communities
 - Objective 2 - To support learning, employment, and sustainable economic growth
 - Objective 3 - To support people at home and in their community
 - Objective 4 - To respect, enhance and enjoy our environment
- 3.3** To make sure we are all working towards the same purpose, the 2015 Act puts in place seven well-being goals on the Council. The 2015 Act makes it clear the listed public bodies must work to achieve all the goals, not just one or two, these being:
- A prosperous Wales
 - A resilient Wales
 - A healthier Wales
 - A more equal Wales
 - A Wales of cohesive communities
 - A Wales of vibrant culture and Welsh Language
 - A globally responsible Wales
- 3.4** The Sustainable Communities for Learning Programme contributes to achieving the wellbeing goals by:
- Improving sustainability of school buildings through the creation of BREEAM Excellent accommodation.

- Ensure an efficient supply and demand of school places across the Vale of Glamorgan through effective forecasting of future demand.
- Providing additional school places to meet increased demand as a result of recent and proposed housing developments.
- Providing facilities available for community use.

3.5 The 2015 Act imposes a duty on all public bodies in Wales to carry out “sustainable development”, defined as being, "The process of improving the economic, social, environmental and cultural well-being of Wales by taking action, in accordance with the sustainable development principle, aimed at achieving the well-being goals." The action that a public body takes in carrying out sustainable development includes setting and publishing well-being objectives and taking all reasonable steps in exercising its functions to meet those objectives.

3.6 The 2015 Act sets out five ways of working needed for the Council to achieve the seven well-being goals, these being:

- The importance of balancing short-term needs with the needs to safeguard the ability to also meet long-term needs.
- Considering how the Council’s objectives impact upon each of the wellbeing goals listed above.
- The importance of involving people with an interest in achieving the well-being goals and ensuring that those people reflect the diversity of the area which the Council services.
- Acting in collaboration with other persons and organisations that could help the Council meet its wellbeing objectives.
- Acting to prevent problems occurring or getting worse.

3.7 The Sustainable Communities for Learning Programme meets the five ways of working by:

- Responding to the need to ensure that there is a well-managed balance of supply and demand of school places as a result of recent and planned housing developments. It is recognised that the changing demographics in the Vale of Glamorgan will significantly affect the demand for our services. Short term and long term need and the assessment of demographic increases is an important aspect of the Council's strategic planning responsibilities.
- Developing schools that will have an environment reflective of the national mission for education in Wales and future curriculum.
- Working towards ensuring that all pupils within the Vale have every opportunity to attain the best possible outcomes. This ambition is achieved by ensuring that schools remain sustainable, reflects the needs of local communities and are equipped with the best possible learning environments.
- Contributing towards a healthier Wales by supporting sustainable transport strategies and providing additional sport facilities.

- Contributing towards a prosperous Wales by committing to working with Welsh Government on the Sustainable Communities for Learning Programme. The Sustainable Communities for Learning Programme in the Vale of Glamorgan will drive greater social value while delivering on the Welsh Governments community benefits through its investment in education infrastructure and employment. Specifically, it will increase contributions to education, training and skills across the Vale and the region and provide opportunities for local tradespeople and to use local resources, wherever possible.
- Delivering rigorous consultation with open communication channels and numerous opportunities for stakeholders to engage throughout the process.
- Ensuring that schools are of the right size, in the right places and serving the educational needs of their local communities as part of the school organisation process.

4. Climate Change and Nature Implications

- 4.1** There are no direct climate and nature implications as a result of this report. However, it should be noted that as part of the tendering process, contractors are required to sign up to the Sustainable Communities for Learning Team’s Sustainability Strategy Requirements and Ecology Strategy Requirements. This ensures projects deliver upon the objectives of the Council in relation to climate change and the nature emergency.

5. Resources and Legal Considerations

Financial

- 5.1** There are no direct financial implications as a result of this report.

Employment

- 5.2** There are no direct employment implications as a result of this report. However, it should be noted that the Barry Secondary Learning Communities projects have resulted in 158 new full-time jobs, 104 apprenticeships and 32 work experience placements.

Legal (Including Equalities)

- 5.3** As part of the tendering process, contractors are required to submit targets for community benefits. These are then written into contractual arrangements and are subject to financial penalties for non-delivery.

6. Background Papers

- 6.1** None.