NORTH YORKSHIRE COUNTY COUNCIL

CHILDREN & YOUNG PEOPLE'S SERVICE

CORPORATE DIRECTOR'S MEETING WITH EXECUTIVE MEMBERS

9 March 2021

THE HIGH NEEDS BLOCK 2021-22

1.0 PURPOSE OF THE REPORT

1.1 This report summarises the expected budget for the High Needs Block in 2021-22 and outlines the extent of the anticipated financial pressure. It also provides a summary of a number of proposed changes to the budget.

2.0 HIGH NEEDS BLOCK FUNDING

2.1 The anticipated overall High Needs Block allocation available for North Yorkshire in 2021-22 is £63.3m. This figure is reduced by the Education and Skills Funding Agency (ESFA) in relation to funding provided directly to academies and for some post-16 provision. It also includes an anticipated import/ export adjustment (which for the purposes of this paper remains based on January 2020 census and February R06 ILR pending further updates from DfE). The deductions amount to £6.4m resulting in a net funding allocation to the local authority of £56.9m. This compares to a final cash allocation for 2020-21 of £50.8m – an increase of £6.1m. However, this increase includes the impact of the mainstreaming of Teacher's Pay Grant (TPG) and Teacher's Pension Employer Contribution Grant (TPECG) which amounted to £889k. The likefor-like increase is, therefore, £5.2m. The final High Needs Block figure will not be known until June 2021 following confirmation of the import/export adjustment. Table 1 summarises the anticipated funding position.

	2020-21	2021-22	Variance
	£m	£m	£m
HNB allocation*	56.677	63.346	6.669
Import/ export adjustment	(1.728)	(1.728)	-
ESFA deductions	(4.144)	(4.725)**	(581)
North Yorkshire LA allocation	50.805	56.893	6.088

Table 1: HNB Funding Position

*Note 2021-22 Allocation includes mainstreaming of the TPG, TPECG and Supplementary Fund ** Figure of £4,308k as published by DfE and an additional LA estimate of £417k

2.2 Changes in government regulations since January 2020 prohibit the local authority from using its general resources to fund any overspend in the High Needs Block (and any other DSG blocks). However, the local authority has chosen to set aside a provision to mirror any projected in-year 2021-22 High Needs Block deficit in order to adhere to its sound and prudent financial management principles. This provision will continue to be held in place until such a time that the overall cumulative HNB deficit has been fully recovered.

3.0 HIGH NEEDS BUDGETS

3.1 The proposed budget for High Needs has been prepared building in provisional estimates for increased numbers of children and young people assessed as requiring Education, Health and Care Plans. This reflects recent trends, known planned movements and best estimates of future demand. The proposed High Needs Budget for 2021-22 is outlined in Table 2 below:

able 2. High Needs Budget			
Budget Line	2020-21	2021-22	Change
	£k	£k	£k
High Needs Commissioning	49,714	53,068	3,354
Alternative Provision	1,101	1,637	536
Inclusion	1,134	1,149	15
Hubs & SEN Provision	2,314	2,384	70
AD - Inclusion	190	197	7
Financial Support	54	54	0
DSG Overheads	420	420	0
Provision for additional demand	-	483	483
Estimated Spending	54,927	59,393	4,466
Estimated Funding	50,805	56,893	6,088
Estimated In-year Deficit	4,122	2,500	(1,622)
		-	-
Projected In-year Deficit	2,475	2,500	-
Projected Accumulated Deficit B/f	6,096	8,571	-
Projected Accumulated Deficit C/f	8,571	11,071	

Table 2: High Needs Budget

- 3.2 In total, anticipated expenditure in 2021/22 amounts to £59.4m with a provisional projected shortfall of £2.5m. This includes provision for additional demand arising from the return to school following the third national lockdown and disrupted education during the covid-19 pandemic. It should be noted that c.89% of anticipated spend is within High Needs Commissioning. This principally funds special school commissioned places and top-up funding, mainstream E3 top-up funding, independent and non-maintained special school commissioned places and special provision institution (SPI) commissioned places. The figures included in section 3.1 reflect the latest estimates and will be closely monitored throughout the year.
- 3.3 For financial planning purposes, the 2021-22 High Needs Commissioning budget supports approximately 3,585 FTE children and young people assessed as requiring Education, Health and Care Plans (EHCPs). In reality, the number of children currently supported is in excess of this. The financial planning assumptions indicate that there will be an increase of approximately 330 children and young people financially supported through EHCPs in 2021-22 in different types of provision. This represents an expected increase in demand of 9% in the next year alone.
- 3.4 The High Needs Commissioning Budget of £53,068k represents the single largest area of spending; most of the financial pressure in the last three years has been in this area. The budget comprises:

Table 3: High Needs Commissioning Budget 2021-22		
Budget Line	£k	%
North Yorkshire Special Schools	20,764	39.1
North Yorkshire Mainstream School E3 Top-up Funding	7,755	14.6
Independent and Non-maintained Special Schools	8,929	16.8
Special Provision Institutions	2,609	4.9
Other Local Authority provision	2,252	4.2
Pooled Budget	1,942	3.7
FE Colleges	1,491	2.8
Personalised Learning Pathways	1,453	2.7
ILP's	792	1.5
Early Years	901	1.7
Targeted Mainstream Provision	1,310	2.5
PRU's	2,646	5.0
Other	225	0.4
Total	53,068	100

3.5 53.7% of the High Needs Commissioning is spent directly with schools and academies in North Yorkshire with nearly two-fifths targeted at supporting the ten special schools in North Yorkshire develop and deliver provision to meet the needs of children and young people locally. However, nearly £8,929k is spent on approximately 183 places in independent and non-maintained special schools. This represents nearly 17% of the High Needs Commissioning Budget and represents an increase in absolute cost and an increase in overall share of the total spend compared with 2020-21. This continues to represent a high per pupil cost to the overall budget.

4.0 SPECIAL SCHOOLS

- 4.1 The Special schools funding formula for 2021-22 has been agreed by Executive on 16 February 2021, taking into account review activity into three specific aspects of the budget allocations :-
 - The inflationary uplift factors applied to banding allocations (for top-up funding);
 - The specific operation of the Minimum Funding Guarantee in the Special school sector (taking into account that the local authority determined a rate of +4% in 2020-21 to provide additional protection to the sector);
 - A review of the Contextual funding arrangements, which were acknowledged to have reached a stage where it was challenging to evidence that the allocations to individual schools were appropriate reflections of their specific circumstances and relative level of need;
- 4.2 The position adopted for 2021-22 has been informed by a consultation exercise undertaken with the Special school sector during the course of November and December, which specifically considered the setting of the MFG rate for 2021-22 and a proposal to reform the contextual funding element of the formula. The response rate was very positive with eight out of the ten schools responding, with all schools being offered the opportunity for individual meetings to discuss the implications for their setting. The outcomes of the consultation exercise were reported to the January meeting of the Schools Forum, which was broadly supportive of the local authority's proposals to set the MFG at 0% for the sector for the 2021-22 financial year and to proceed with the reform of the contextual funding element. These proposals were subsequently endorsed by the County Council Executive on 16 February, 2021.

- 4.3 Firstly, it was determined that the Banded funding allocations (Element 3 funding in the DfE terminology) would increase in line with an assumed rate of inflation of +2%, which is the same percentage uplift in baseline pupil-led funding for mainstream schools in 2021-22 (as per Schools block national funding formula: technical note July 2020). Since the banded funding allocation is reflecting costs incurred beyond the Element 2 funding allocation of £6,000, (and because this figure has been held constant for many years by the DfE), the allocations for each banding will actually increase by greater than 2% with the highest percentage increases applying to the lower banding allocations. These rates will apply across all settings in receipt of top-up funding.
- 4.4 The Minimum Funding Guarantee for Special schools has been set at 0%, taking into account the significant pressure on the high needs budget and the previous years' position of providing an MFG rate significantly in excess of the rate of inflation.
- 4.5 The Contextual funding allocation will be modified for 2021-22, so that it operates with a combination of a lump sum factor, per pupil allocation and a floor area factor (to reflect the differential pressure of premises costs between schools). In addition, there will be components to recognise split site operations and the costs associated with operating hydrotherapy pools.
- 4.6 Indicative special school funding statements have been prepared and shared with North Yorkshire special schools on the basis of the adoption of the proposals above, alongside accompanying guidance on how the formula allocations have been determined, and incorporating the assessment of the commissioned places for the 2021-22 academic year. Final Special school funding statements will be issued by 12 March 2021.

5.0 PUPIL REFERRAL SERVICE

5.1 The Pupil Referral Service / Alternative Provision budget for 2021-22 has been constructed on the basis that planned commissioned places at all settings will be at the same level in the 2021-22 academic year as in the 2020-21 academic year (i.e. 162 places). Top-up funding allocations (Element 3 funding) and preventative place funding allocations will be increased in line with the inflationary uplift described in Section 4 above. We will continue to support individual establishments in ensuring that a robust three year budget plans exist for each establishment.

6.0 FURTHER WORK DURING 2021

- 6.1 Over the last few years it has not been possible to meet our statutory obligations and contain the financial pressures within the funding allocation provided by Department for Education. The local authority's view is that funding from the Department for Education has not kept pace with the rise in demand as a result of legislative reform introduced by the DfE in 2015. Whilst we continue to lobby for a fairer funding deal for North Yorkshire, the local authority continues to progress the Strategic Plan for SEND (0-25) to reshape provision and deliver value for money. Further work is necessary and the work programme will, therefore, focus on:
 - Development of a free special school in Selby;
 - Close working with Special Schools and PRS/AP settings in ensuring high quality, financially sustainable provision;
 - Embedding locality boards across the county to facilitate discussion of local SEND issues and solutions;
 - Establishing a Contracts Board to provide focus on the contractual review of key suppliers providing high cost external placements;

- Implementation of phase 1 and developing phase 2 of the targeted mainstream provision;
- Post-implementation review of the locality-based SEND hubs and traded offer;
- Post-implementation of medical tuition models;
- Implementation of a revised contextual funding component to the special school funding formula for 2021-22;
- Review of opportunities for capital development to reshape provision across the county to meet need locally where possible, including use of the Special Provision Capital Fund and the ringfenced component of the School Condition Funding;
- other reviews and developments consistent with the Strategic Plan for SEND.

7.0 CONSULTATION

- 7.1 Consultation was undertaken as part of the Council's budget setting process resulting in the approval of the Budget and MTFS on 17 February 2021. Feedback was given due consideration and informed the recommendations which were approved by Executive on 26th January 2021. Detailed reports and appendices outlining the detailed consultation feedback can be found here: <u>https://edemocracy.northyorks.gov.uk/CeListDocuments.aspx?CommitteeId=1147&M</u> eetingId=4744&DF=26%2f01%2f2021&Ver=2
- 7.2 Consultation for proposals impacting on the Special School funding formula took place from 10th November 2020 to 17th December 2020. Specific recommendations relating to the Special School MFG and contextual funding component of the special school funding formula were agreed by full Executive on 16 February 2021. The report and appendices can be found here: <u>https://edemocracy.northyorks.gov.uk/ieListDocuments.aspx?Cld=1147&Mld=4484& Ver=4</u>

8.0 EQUALITIES IMPLICATION

- 8.1 An equality impact assessment form is attached in **Appendix 1**.
- 8.2 The local authority will continue to meet its statutory obligations in respect of its duties to make arrangements for children with Education, Health and Care Plans.

9.0 RECOMMENDATIONS

- 9.1 The Corporate Director Children and Young People's Service in conjunction with Executive Members are asked to:
 - (i) note the contents of this report;
 - (ii) note the financial position;
 - (iii) to approve the proposed high needs block budget outlined at section 3.1

STUART CARLTON

Corporate Director – Children and Young People's Service

Report Prepared by Howard Emmett, Assistant Director, Strategic Resources

Background Documents:

• Appendix 1 Equality Impact Assessment Form



Equality impact assessment (EIA) form: evidencing paying due regard to protected characteristics

(Form updated May 2015)

High Needs Block Budget 2021-22

If you would like this information in another language or format such as Braille, large print or audio, please contact the Communications Unit on 01609 53 2013 or email communications@northyorks.gov.uk.

যদি আপনি এই ডকুমেন্ট অন্য ভাষায় বা ফরমেটে চান, তাহলে দয়া করে আমাদেরকে বলুন।

Equality Impact Assessments (EIAs) are public documents. EIAs accompanying reports going to County Councillors for decisions are published with the committee papers on our website and are available in hard copy at the relevant meeting. To help people to find completed EIAs we also publish them in the Equality and Diversity section of our website. This will help people to see for themselves how we have paid due regard in order to meet statutory requirements.

Name of Directorate and Service Area	North Yorkshire County Council:
	Central Services
Lead Officer and contact details	Howard Emmett - Assistant Director -
	Strategic Services
Names and roles of other people involved	Jane Le Sage, Assistant Director – Inclusion
in carrying out the EIA	Howard Emmett – Assistant Director –
	Strategic Resources
	Sally Dunn – Head of Schools, High Needs
	and Early Years Finance
	Martin Surtees – Senior Finance – Projects
	Leanne Stables – Senior Accountant
	Melissa Hird, Accountant

How will you pay due regard? e.g. working group, individual officer	This work has been overseen by the High Needs Funding Officer Group. Monitoring takes place via the Children and Young People's Leadership Team. The High Needs Funding Subgroup of the Schools Forum and the Schools Forum itself have advisory roles.
	Changes in budget are informed by anticipated demand pressures and known changes. Proposals have also been informed by a technical consultation with special schools in the County and has had its own EIA, which was separately monitored and reviewed.
	The decision on the allocation of the Schools Budget (which includes the High Needs Block Budget) has been delegated to the Corporate Director – Children and Young People's Service in consultation with the Corporate Director, Strategic Resources and Executive Members for CYPS and Finance on 17 th February 2021.
When did the due regard process start?	Work on the High Needs Budget has been ongoing since Autumn 2020.

Section 1. Please describe briefly what this EIA is about. (e.g. are you starting a new service, changing how you do something, stopping doing something?)

Under the Children and Families Act 2014, the Council has a statutory responsibility to support the assessed needs of the children & young people with special education needs & disabilities (SEND). Under the School Standards & Framework Act 1998 and School Early Years Finance England Regulations 2020 the Council has statutory duties to set the non-schools education budget (including the High Needs Budget). This EIA considers the cumulative impact of changes in High Needs Budget informed by the wider budget setting by County Council members on 17th February 2021 where the decision to set the High Needs Budget was delegated to the Corporate Director Children & Young Peoples Service.

Section 2. Why is this being proposed? What are the aims? What does the authority hope to achieve by it? (e.g. to save money, meet increased demand, do things in a better way.)

High Needs Funding provided by central government to local authorities has remained insufficient to meet the increase in the number of children and young people assessed as requiring Education, Health and Care Plans as a result of changes in the Council's statutory duty introduced through the Children and Families Act 2014. This means the Council is now facing difficult decisions on how to ensure sufficient funding is allocated to meet the needs of every

child and young person with special educational needs and disabilities (SEND), while at the same time setting a balanced budget.

Following an unprecedented increase in the number of financially supported Education, Health and Care Plans (EHCPs), financial pressure on SEND and High Needs has continued to increase in 2020-21 with a projected underlying overspend of c.£2.5m. In 2021-22, the financial pressure is expected to continue. Following regulation changes in early 2020, the local authority is effectively prohibited from using core council funding towards costs which should be properly funded from Dedicated Schools Grant. However, the local authority has made provision within the LA budget to mirror any High Needs deficit as part of prudent budget setting arrangements. The High Needs Block Budget reflects the SEND Strategic Plan which aims to improve the service offer for children & young people with SEND.

Section 3. What will change? What will be different for customers and/or staff?

There are currently no new savings plans for the High Needs Block Budget for 2021-22 although reviews or developments consistent with the Strategic Plan for SEND may commence during the year. Where that is the case, any savings proposal will be accompanied by an individual Equalities Impact Assessment and changes reflected in future year budgets.

Section 4. Involvement and consultation (What involvement and consultation has been done regarding the proposal and what are the results? What consultation will be needed and how will it be done?)

This assessment is based on a process of consultation and equality impact assessment built into the Council's overall High Needs Block budget development process. This has included:

- Equality impact assessments (EIAs) for previous specific budget proposals where a potential equality impact has been identified;
- On-going discussions between colleagues, the High Needs Funding subgroup of North Yorkshire Schools Forum, and special school headteachers meetings;
- Additional consideration of cumulative equality and wider community impact of the proposals;
- Responses to public consultation through our website, through public meetings
- Special Schools have been consulted on the the special school funding formula.

Section 5. What impact will this proposal have on council budgets? Will it be cost neutral, have increased cost or reduce costs?

The proposed High Needs Block Budget_results in planned spending of £59.4m which is c.£2.5m in excess of available funding. Local authority provision will be established to mirror

this deficit. It is the intention that the high needs deficit will be repaid and any local authority provision can be released back into the council's General Fund in due course.

The Council expects to receive £56.9m million in High Needs Block cash funding to deliver provision for children and young people with SEND and to fulfil our statutory duty under the Children and Families Act 2014.

Section 6. How will this proposal affect people with protected characteristics?	No impact	Make things better	Make things worse	Why will it have this effect? Provide evidence from engagement, consultation and/or service user data or demographic information etc.
Age				 Things will improve as follows: A revised continuum of special education provision and a wider AP offer for North Yorkshire for secondary aged pupils will in the longer term mean a strengthened offer -with -improved -earlyidentificationand intervention. This should result in a reduereduction ine the numbers of pupils being excluded. Lower numbers of permanent exclusion and negative impact of such in terms of attainment and life chances The- development -of -targeted mainstream provision will increase provision -for -secondary pupils -with_SEMH and capacity_of schools to support children with SEMH Local approaches and funding will allow for tailoredapproaches to meet needs for the secondary age group. There may be -an -impact- on secondary-schools as -provision models -are- changed -and -as -other aspects- of -the- Strategic- Plan- are introduced. This will be mitigated by clear -communication. There will be further mitigation in that for young people with an EHCP the LA have a statutory duty to make the provision contained in that plan and for -those -young -people -who- are permanently excluded- it -is -statutory_duty- upon- the -LA -to provide education. Age is not a factor in determining needs in the banded approach to top-up funding. The statutory obligations only apply to children aged 0-25. However, age is not a factor in this budget as all children aged 0-25 with SEND will be able to access thefunding -equally- according- to assessed need. A -further -mitigation -for -age, -disability -and gender is that for those with an EHCP, the LA have a _statutory duty -to -meet -the -needs contained withinthe plan and this over-rides anyother considerations, policies or resources

Disability			 For children and young people with a disability and special educational needs there will be a strengthened offer —of special education provision which will increase the number -of children and young people educated in –North Yorkshire -and improve their_outcomes. Requests -for- assessment- will -be accompanied byclear- evidence -ofneed, -interventions -and provision, making it more clear what provision is required to meet needs.— -This -will ensure -tha the -young -person receives -exactly -the -provision they require. A -further -mitigation -for -age, -disability -and gender is that for those with an EHCP, the LA have -a- statutory -duty -to -meet -the- needs contained within the_plan and this over-rides any other considerations, policies or resources.
Sex (Gender)	✓ ✓	✓	A revised continuum of special education provision and a wider AP offer for North Yorkshir for secondary aged pupils of both genders wi in the longer term mean a strengthened offer wit improved early identification and interventior This should reduce the numbers of pupils beinthat areg excluded.
			It is anticipated there would be no identifiable impact on gender as a result of setting the Hig Needs Budget. The SEND population of young people with EHCPs is higher among boys however as the LAhave a statutory duty to meet the needs containedwithin the plan, this over-rides any other considerations, policies or resources
Race	×		It is anticipated there would be no identifiable impact on specific ethnic groups as a result of setting the High Needs Budget.
Gender reassignment	 ✓ 		It is anticipated there would be no identifiable impact in relation to gender reassignment as result of setting the High Needs Budget.
Sexual orientation	•		It is anticipated there would be no identifiable impact in relation to sexual orientation as a result_of setting the High Needs Budget.
Religion or belief	✓		It is anticipated there would be no identifiable impact on specific religious groups or beliefs as result of setting the High Needs Budget.
Pregnancy or maternity	✓ 		It is anticipated there would be no identifiable impact as a result of setting the High Need Budget.
Marriage or civil partnership	√		It is anticipated there would be no identifiable impact as a result of setting the High Need Budget.

Section 7. How will this proposal affect people who	No impact	Make things better	Make things worse	Why will it have this effect? Provide evidence from engagement, consultation and/or service user data or demographic information etc.
live in a rural area?	~	•		There may be a beneficial impact on those living in rural areas as a greater range of AP is developed. It is anticipated this will increase the range of options and the understanding of what is available in rural areas with a clear package into adulthood within the local rural community
have a low income?	✓	•		The proposals should have no or even a positive impact on low income families. Children in AP will be overseen by a central officer who will monitor participation and progress and can intervene if any difficulties arise and are impacting on outcomes. It is anticipated there would be no identifiable impact as a result of setting the High Needs Budget

Section 8. Will the proposal affect anyone more because of a combination of protected characteristics? (e.g. older women or young gay men) State what you think the effect may be and why, providing evidence from engagement, consultation and/or service user data or demographic information etc.

It is anticipated the proposed budget will impact more on the following:

Secondary aged pupils with additional needs especially boys. Boys make up the larger numbers accessing PRS/AP provision at present.

These groups are more likely to find change challenging and will need support to make the transition. This will be mitigated by careful planning for any changes, work with ISOS on new models, phased transition to the new models, ongoing engagement with schools, young people and parents/carers and careful review during and following implementation of changes. The overall development of the continuum of need will also provide mitigation. In addition, for young people with an EHCP, the LA have a statutory duty to make the provision contained in that plan and for those young people who are permanently excluded it is statutory duty upon the LA to provide education.

Young People with EHC Plans may also benefit from the wider implications of changes to the targeted mainstream provision model and the increase in capacity within the specialist sector.

Young people with special educational needs and disabilities.

These groups are more likely to find change challenging if changes are made to current services they will need support to make the transition. For each child, there is a statutory process of annual reviews, which ensures that their needs -are -reviewed -annually -and -the -provision- is -reviewed -to -ensure -it- meets their -special educational needs.

Section 9. Next steps to address the anticipated impact. Select one of the	
following options and explain why this has been chosen. (Remember: we have	option
an anticipatory duty to make reasonable adjustments so that disabled people can	chosen
access services and work for us)	

1.	No adverse impact - no major change needed to the proposal. There is no potential for discrimination or adverse impact identified.	✓
2.	Adverse impact - adjust the proposal - The EIA identifies potential problems	
	or missed opportunities. We will change our proposal to reduce or remove these	
	adverse impacts, or we will achieve our aim in another way which will not make	
	things worse for people.	
3.	Adverse impact - continue the proposal - The EIA identifies potential	
	problems or missed opportunities. We cannot change our proposal to reduce or	
	remove these adverse impacts, nor can we achieve our aim in another way	
	which will not make things worse for people. (There must be compelling reasons	
	for continuing with proposals which will have the most adverse impacts. Get	
	advice from Legal Services)	
4.	Actual or potential unlawful discrimination - stop and remove the proposal	
	 The EIA identifies actual or potential unlawful discrimination. It must be 	
	stopped.	
Ex	planation of why option has been chosen. (Include any advice given by Legal Se	ervices.)
the (M ⁻ pro Bue	e Council must set a budget for High Needs within the funding envelope available in councils resources approved as part of the Budget/ Medium Term Financial Strate TFS) on 17 February 2021. The High Needs Budget proposal enables funding to me jected demand, alongside provision against any deficit approved as part of the Cou dget/ MTFS on 17 February 2021. There is a projected shortfall of up to £2.5m and posals acknowledge that this represents a savings gap which will require further wo	gy eet ncil's the

Section 10. If the proposal is to be implemented how will you find out how it is really affecting people? (How will you monitor and review the changes?)

any further proposals.

In addition to the regular monitoring and reporting of finances to the Schools Forum, the Strategic SEND Plan sets out a comprehensive countywide North Yorkshire Inclusion Partnership model which will provides a strategic vision across North Yorkshire.

We will review performance across North Yorkshire Special Schools through regular discussions with Headteachers and Finance staff from special schools.

Whilst this proposal incorporates decisions made by the Executive on 26 January 2021, the proposal is principally about setting the totality of the budget available for High Needs/SEN. The proposal has been developed with due regard to the funding made available through the High Needs Block of the DSG, the budget provision made available through the Council. Therefore, the budget performance and system-wide performance will be reviewed by the Executive through the Quarterly performance monitoring regime.

Section 11. Action plan. List any actions you need to take which have been identified in this EIA, including post implementation review to find out how the outcomes have been achieved in practice and what impacts there have actually been on people with protected characteristics.

1. Review of	Llowerd		arrangements
1 Review of	Llaward		
implementation /	Howard Emmett/ Jane Le Sage	March 2022	Quarterly Performance and Finance Monitoring Arrangements

Section 12. Summary Summarise the findings of your EIA, including impacts, recommendation in relation to addressing impacts, including any legal advice, and next steps. This summary should be used as part of the report to the decision maker.

Section 13. Sign off section

This full EIA was completed by:

Name: Job title: Directorate: Central Services Signature:

Completion date:

Authorised by relevant Assistant Director (signature): Howard Emmett

Date: