

## **The Vale of Glamorgan Council**

### **Learning and Culture Scrutiny Committee: 13th November, 2018**

#### **Report of the Director of Learning and Skills**

#### **Provision of Sanitary Products in Schools in the Vale of Glamorgan**

##### **Purpose of the Report**

1. To inform Members of the work undertaken by the Learning and Culture Scrutiny Committee Delivery Working Group to provide sanitary products in schools in the Vale of Glamorgan and present their findings for improving provision and distributing grant funding.

##### **Recommendations**

That the following be urgently recommended to Cabinet:

1. That the remaining £209.05 from Unison be augmented with £490.95 from the Welsh Government 2018/19 revenue grant to purchase and donate a selection of sanitary products to the value of £100 for each Vale Foodbank in the Vale of Glamorgan and the foodbank operated by the Tabernacle Baptist Church in Penarth.
2. That the remaining £8,175.05 revenue grant from Welsh Government for the 2018/19 financial year be distributed to schools through the allocations detailed in Appendix A, as part of a ring-fenced fund, the terms and conditions of which are:
  - That resources, including sanitary products and emergency clothing, are made freely available to all students;
  - That a selection of resources are made available based on the needs of the students;
  - That access to free sanitary resources is widely advertised and all students are aware of how these can be accessed;
  - That a named individual has lead responsibility in ensuring a good selection of stocks are maintained;

- The students can access enough items to support more than their immediate needs;
  - That resources are easily accessible at identified / highlighted venues.
  - That at the end of the financial year, any unspent funding is returned to the Learning and Skills Directorate Finance Manager for reallocation in line with the above terms and conditions.
3. That delegated authority be granted to the Commercial and Consultancy Manager, in consultation with the Director of Learning and Skills, to utilise the capital funding of £31,512 from Welsh Government to improve the toilet facilities in Holton Road Primary school to ensure dignity and privacy for pupils.
  4. That the use of article 14.14 of the Council's Constitution (urgent decision procedure) be authorised in respect of recommendation 3 above, to effectively use the capital funding from Welsh Government before the end of the financial year.
  5. That the Wellbeing Lead at St. Cyres Secondary School be invited to address the Wellbeing Group to share the best practice found at that school.
  6. That the £8,666 revenue grant from Welsh Government for the 2019/20 financial year be distributed to schools using the same allocation method detailed in appendix A, updated with the next academic year numbers on roll, as part of a ring-fenced fund, the terms of conditions of which as are recommendation 2 above.

## **Reasons for the Recommendations**

1. To provide emergency relief to citizens of the Vale of Glamorgan who might not be able to access sanitary provision in schools.
2. To provide schools with flexible access to the revenue grant from Welsh Government in line with the wishes of the Learning and Culture Scrutiny Committee Delivery Working Group: that all learners can easily access sanitary provision with dignity.
3. To improve the toilet facilities at the Primary School to improve privacy and dignity for learners and ensure the Capital funding from Welsh Government was utilised within timescales.
4. To effectively use the capital funding from Welsh Government before the end of the financial year.
5. To share the best practice found at that school.
6. To provide schools with flexible access to the revenue grant for the 2019/20 financial year.

## **Background**

2. On 23rd April, 2018 the Learning and Culture Scrutiny Committee considered a Request for Consideration from Councillor Mrs. J.M. Norman calling on the Scrutiny Committee to support in principle the provision of free sanitary products in all schools in the County.

3. Welsh Government also announced that they would provide £1m to be used to help relieve period poverty in communities and schools across Wales. The Vale of Glamorgan Council was notified on 23rd March, 2018 that it would receive a capital funding allocation of £31,512 for the 2017/18 financial year. This capital funding would be carried forward to 2018/19 and should be used by Local Authorities on "sanitary equipment and necessary changes to toilet facilities in schools where it is needed. This could mean disposal bins for sanitary products, vending machines or adjustments to cubicles."
4. A £1,170 donation was also received from Unison to tackle period poverty in the Vale of Glamorgan.
5. To complement the capital funding, revenue grant funding of £8,666 for the 2018/19 and 2019/20 financial years is also made available. The funding notification letter states, "The funding must be used to provide feminine hygiene products to those women and girls most in need in your Authority. You are in the best position to determine the most appropriate mechanisms to reach vulnerable communities which may include distributing from partnerships with local food banks, community hubs or relevant groups".
6. The Learning and Culture Scrutiny Committee subsequently recommended that
 

**"(1) T H A T a small working group (namely a delivery group) be established consisting of Members of the Committee with the terms of reference to include:**

  - To investigate further the current approach to promoting and providing and disposing of sanitary products in primary and secondary schools throughout the Vale of Glamorgan;**
  - To gather evidence from students, staff and health professionals on the current provision;**
  - To identify areas of good practice with the intention of providing education for all pupils and an understanding of the provision.**

**(2) T H A T Committee Members interested in sitting on the working group referred to in recommendation 1, above, contact the Democratic Services Officer to make necessary arrangements for the working group to convene.**

**(3) T H A T the Scrutiny Committee recommends to Cabinet that in the interim, each secondary school in the Vale of Glamorgan be given £100 worth of sanitary products, and each primary school be given £30 worth of sanitary products, while the Scrutiny Committee working group examines this matter in full detail, including the means of distributing remaining and future funding from Welsh Government."**
7. At its meeting on 21st May, 2018 Cabinet endorsed these recommendations (Minutes C306 refers).
8. A Delivery Working Group was subsequently set up consisting of Councillors L. Burnett, Mrs. J.M. Norman, Mrs. R. Nugent-Finn and Mrs. S.D. Perkes.

## Relevant Issues and Options

9. For the initial relief packs of sanitary products sent to schools, the Directorate of Learning and Skills procured a range of sanitary products which were distributed to primary and secondary schools across the Vale. The range of products was determined after consultation with staff in the department who were parents, and it was also considered appropriate to send a range of products to allow choice for pupils and if required, their families, while also being mindful of health education guidance. The Delivery Working Group and schools can then gauge the usage of these varied stocks to determine future demand. Initial feedback from schools has been positive for these initial relief packs.
10. These initial relief packs were funded from the donation from Unison. Due to a few items in the order being unavailable after the order, a small amount of this donation is still available, amounting to £209.05.
11. A survey of 100 pupils was undertaken to determine levels and type of need amongst pupils in schools in the Vale of Glamorgan and the responses were considered by the Delivery Working Group. It was noted that this was a small number (0.5% of pupils) in terms of response rate, however the Delivery Working Group felt that this proved a useful source of baseline information. Of particular concern is the number of responders who struggled to afford sanitary care (45%), the number who had needed to borrow sanitary products (up to 75%), and the number of pupils who had needed to improvise sanitary products (up to 73%). Full survey responses are available in the Members' Room for information.
12. Members of the Delivery Working Group also discussed the matter with their local School Councils, and it has been debated by the Vale Youth Forum. Pupils are aware of and welcome the new initiative, however it emerged that the availability of sanitary items varied across schools; dependent upon emergencies and whether pupils accessed free school meals. Apart from the disparity of provision, pupils also stated that in some schools they had little access to information about periods and sanitary products, and felt that this information should also be shared across all genders.
13. After considering this information, the Scrutiny Committee Delivery Working Group determined that sanitary provision should be made available to all pupils, and not just those who accessed free school meals, and information on this service should be distributed widely to all pupils. Members also feel it important that pupils be able to access sanitary products without having to request these directly from staff and determined to investigate this further.
14. To see existing solutions in practice, Members toured two primary and two secondary schools in the Vale of Glamorgan and discussed approaches to distribution of sanitary products with wellbeing staff. Both secondary schools offer sanitary products to learners in need through a variety of means and distribution points and both are modern 21st century schools with disposal facilities in all toilet blocks. A discrepancy in provision was noted by Members, with one school offering sanitary products from school budgets in an open access location whereas the other has staff retaining supplies, often purchased by teachers, for distribution as and when required. The latter school has stated

that, should additional funding be available, they are also willing to offer open access to sanitary products for all learners. The services at each school are promoted differently, with one school publicly advertising the facilities available through a variety of means, including social media, while the other chiefly operates through a referral system. Both raise the matter with learners as part of their wellbeing services.

15. With regards to the primary schools, both have a small selection of products available for learners through approachable members of staff and have disposal facilities available, and one school indicated that they could explore providing sanitary products through a discreet open access scheme. The schools also raised concerns that their toilets were inadequate in providing dignity and privacy to young learners due to the age and unsuitability of the facilities.
16. All schools were amenable to providing emergency clothing to learners that needed, with one already offering that service.
17. A discrepancy was also found in the way information is provided to all genders, as this is an issue raised by the questionnaire and the Vale Youth Forum. Both secondary schools provide wellbeing information to all learners, however for some learners this is primarily picked up through Biology lessons. With regards to the primary schools, learners are given different advice pertaining to their own gender, and this varied between Years 5 and 6. The Members of the Learning and Culture Scrutiny Committee Delivery Working Group feel it important that all learners are involved in discussions regarding periods, and at an earlier stage rather than later. Both primary schools indicate that they are happy to explore this further.
18. The Delivery Working Group then undertook an Options Appraisal for a range of proposals to determine the best usage of the funding from Welsh Government and the remaining donation from Unison, which included "do nothing" as a baseline. The other options considered were school-level provision and service-level provision. These are detailed below:
  - Do Nothing - This option is primarily considered to provide a baseline against the other options. Schools would continue to manage provision of sanitary products within existing resources and through differing arrangements. This option would mean that the funding from Welsh Government and remaining money from Unison would not be utilised.
  - School-level Provision - Funding is delegated to schools to buy sanitary products as and when required, while existing provision is improved and standardised across the Vale of Glamorgan.
  - Service-level Provision - Council establishes a service through the Learning and Skills directorate to provide schools with sanitary products, buying stock and managing distribution to schools through school wellbeing leads. This is similar to the approach taken by Rhondda Cynon Taff Council as part of their recommendations from their Scrutiny Working Group dealing with free sanitary provisions in schools, which established free dispensing machines in secondary schools and baskets in primary schools as a first trial phase to be reviewed after six months.

19. A high level Options Appraisal is as follows:

|  | <b>Option 0: Do Nothing/ Minimum</b>  | <b>Option 1: School-level provision</b>   | <b>Option 2: Service-level provision</b>  |
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| <b>Advantages &amp; Disadvantages</b>  |   |   |   |
| <b>These are the high level advantages and disadvantages of each option.</b> |   |   |   |
| <b>Advantages</b>  | <ul style="list-style-type: none"> <li>• Minimal work required by Council, allowing resources to be utilised elsewhere.</li> <li>• Allows schools maximum freedom to tackle issue as they see fit.</li> </ul>   | <ul style="list-style-type: none"> <li>• Devolved funding allows schools the flexibility to buy and dispense various sanitary products as and when required.</li> <li>• Information is shared across the Vale of Glamorgan to determine best practice and inform learners.</li> <li>• Funding for products is made available to all learners who require help.</li> </ul> | <ul style="list-style-type: none"> <li>• Council has full control over the provision of products and can access highest level of purchasing power.</li> <li>• Existing model has been trialled elsewhere.</li> <li>• Products can be accessed by all pupils who require support.</li> </ul>                       |
| <b>Disadvantages</b>   | <ul style="list-style-type: none"> <li>• Period Poverty continues to affect residents at an unacceptable level in the Vale of Glamorgan.</li> <li>• Funding from Welsh Government is wasted.</li> <li>• Levels of provision is varied, with no information shared amongst schools / learners / charities</li> </ul> | <ul style="list-style-type: none"> <li>• Funding could be misused by schools as part of general funds.</li> <li>• Capital funding must be used / allocated by end of financial year.</li> <li>• Schools might struggle to distribute products in confidential setting.</li> <li>• Revenue</li> </ul>  | <ul style="list-style-type: none"> <li>• Funding is only guaranteed for the next couple of years, so must be financed in future.</li> <li>• Intensive for Council staff. No available staff resources.</li> <li>• Sanitary products must be bought and stored by the Council.</li> <li>• Dispensers in</li> </ul> |

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|  |  | funding is only guaranteed for a couple of years.   | toilets are at risk of vandalism.<br><ul style="list-style-type: none"> <li>Sanitary products are limited to what can fit in dispenser.</li> </ul>   |
| <b>Services Critical Success Factors</b><br><b>The CSFs are a standard set of criteria to appraise projects.</b>   |  |   |  |
| <b>Strategic Fit</b> <ul style="list-style-type: none"> <li>Contributing to the Reshaping Services Strategy aim and objectives, including the impact on service users, partners and wider society.</li> <li>Resulting in more joined-up service delivery.</li> <li>Recognising the importance of balancing short-term needs with the need to safeguard the ability to also meet long-term needs.</li> <li>Contributing to Corporate Plan and Service Plan objectives.</li> <li>Demonstrates synergy with other strategies, programmes and projects.</li> </ul> | <ul style="list-style-type: none"> <li>Impact of Period Poverty on families in the Vale of Glamorgan Council remains unacceptably high.</li> <li>Sacrifices long term benefit for small short term gain in Officer capacity.</li> <li>Does not conform with Council Corporate Plan and Wellbeing of Future Generations Act.</li> <li>Risk of reputational damage.</li> </ul> | <ul style="list-style-type: none"> <li>Relief is provided to learners who require support.</li> <li>Framework for providing support is guaranteed for a couple of years.</li> <li>Information sharing exercise results in more joined-up service delivery.</li> <li>Contributes to Corporate Plan.</li> </ul> | <ul style="list-style-type: none"> <li>Fully accountable service is provided for the public in line with the Council's vision.</li> <li>Fully joined up service available across the Vale of Glamorgan.</li> <li>Would allow provision for all pupils who required support, which is fully in line with the Council's corporate plan.</li> <li>If provision can be maintained, allows for long term supply of sanitary products to all learners.</li> <li>Would not be a strategically collaborative service.</li> </ul> |
| <b>Potential Value For Money</b>   | <ul style="list-style-type: none"> <li>Slight savings achieved due to</li> </ul>   | <ul style="list-style-type: none"> <li>Schools having delegated</li> </ul>  | <ul style="list-style-type: none"> <li>Allows for Maximum</li> </ul>   |

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| <ul style="list-style-type: none"> <li>• Delivering financial savings after allowing for any potential investment.</li> <li>• Contributes to the value for money agenda in terms of ensuring economy, efficiency and effectiveness of spend.</li> <li>• Contributes towards the concept of investing in preventative services to reduce longer term need.</li> <li>• Minimising risk.</li> </ul> | <p>Officer work capacity, however would not result in changes to employment contracts.</p> <ul style="list-style-type: none"> <li>• Loss of funding from Welsh Government that could have gone to citizens of the Vale of Glamorgan Council.</li> <li>• No financial risk.</li> </ul> | <p>funding allows products to be purchased with maximum efficiency of type and time.</p> <ul style="list-style-type: none"> <li>• Effectiveness of spend is still high for schools.</li> <li>• Limited financial risk.</li> </ul>  | <p>efficiency of buying products.</p> <ul style="list-style-type: none"> <li>• A newly founded service would offer low value for money due to setting up logistics, storage and staffing time.</li> <li>• Dispenser machines are simple, if specialised, equipment that would require procuring.</li> <li>• Concern that dispensing machines might not count as Capital expenditure.</li> <li>• High risk of spoilage of products inside machines due to misuse / vandalism.</li> </ul> |
| <p><b>Potential Achievability</b></p> <ul style="list-style-type: none"> <li>• Likelihood to be successfully delivered, considering the Council's ability to assimilate, adapt and respond to the required level of change.</li> <li>• Matching the level of available skills which are required for</li> </ul>  | <ul style="list-style-type: none"> <li>• Fully achievable.</li> </ul>   | <ul style="list-style-type: none"> <li>• High likelihood of achievability in timescales.</li> <li>• Distribution of funding rather than products allows for flexibility in level of change.</li> <li>• Simple service delivery compared to other options.</li> <li>• Capital funding must be agreed</li> </ul> | <ul style="list-style-type: none"> <li>• Low risk of achievability given timescales for use of existing funding, lack of future funding, and skills gap in delivering new service in staff intensive process.</li> </ul>  |



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| successful delivery.   |   | in Capital Works Schedule within the financial year, and works must be carried out in schools within the academic year.   |  |
| <b>Service Provider Capacity and Capability</b> <ul style="list-style-type: none"> <li>• Matching the ability of the service providers (including the third – not for profit – sector) to deliver the required level of service</li> <li>• Is appealing to potential suppliers.</li> </ul> | <ul style="list-style-type: none"> <li>• To reduce Period Poverty, schools must allocate more resources (including teacher time) to tackle this issue.</li> </ul> | <ul style="list-style-type: none"> <li>• Can work alongside existing schemes for the provision of Sanitary products.</li> <li>• Strengthens schools to provide support to pupils.</li> <li>• Limited capacity for work with charities who supply products, however the third sector could still be supported for distribution.</li> </ul> | <ul style="list-style-type: none"> <li>• Beneficial for schools not to have to supply products out of school or teacher budgets.</li> <li>• Would take over the role of some charities already providing support, considered a risk that they might leave area with future funding not guaranteed.</li> <li>• Approach is inflexible if alternative provision is established at a later date.</li> <li>• Filling of machines could be time intensive.</li> </ul> |
| <b>Potential Affordability</b> <ul style="list-style-type: none"> <li>• Likely availability of funding.</li> <li>• Delivering within approved resources.</li> </ul>  | <ul style="list-style-type: none"> <li>• Not applicable.</li> </ul>   | <ul style="list-style-type: none"> <li>• Guaranteed funding for a couple of years.</li> <li>• Sanitary products provision framework must be established</li> </ul>  | <ul style="list-style-type: none"> <li>• Funding concerns exist for establishing new service.</li> <li>• High risk of no external funding after a couple of years</li> </ul>   |

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|  |  | before this time to plan ahead. | so must be resourced out of limited Council funds. |
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20. The Delivery Working Group is also cognisant there are also risks associated with the project and the options detailed above, so a risk assessment has been carried out to identify the likelihood and impact and any method of mitigation required for these.

| <b>Risk No.</b> | <b>Description</b>   | <b>Likelihood</b> | <b>Impact</b>  | <b>Mitigation</b>  |
|-----------------|--|-------------------|--|--|
| 1               | Capital funding could be lost if not used by the end of the financial year             | Moderate          | Loss of Capital Funding could affect availability / use of Revenue funding / donations         | Usage of Capital funding to be explored early in the process, effective engagement with property staff                             |
| 2               | Revenue funding is not guaranteed beyond 2020  | High              | Supply of various sanitary products is key to the success of the project                       | Possible donation streams to be explored, alternative sources to be identified before the end of revenue funding deadline          |
| 3               | Proposed solution might not meet the needs of all pupils                               | Low               | Learners could still be adversely affected by period poverty                                   | Barriers to effective distribution must be identified early, and the needs of pupils must be prioritised throughout the process    |
| 4               | Proposed solution might not synergise with existing provision by schools and charities | Low               | Inefficient distribution will hinder future provision  | Effective communication required with charities and staff providing existing provision   |
| 5               | Sanitary products might be misused   | Moderate          | Vandalism, and any measures taken to prevent such actions, could adversely affect distribution | Methods of dispensation to be tamperproof, possible security arrangements for unisex toilets to be considered, recognition that no |

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|   |   |      |   | barriers should be enacted that would adversely affect provision (including outside of term time)  |
| 6 | Schools have delegated authority over resources, so may not distribute resources as intended by Task and Finish Group | High | The unequal distribution of sanitary products could adversely affect learners suffering from period poverty | Task and Finish Group must work with schools to ensure sanitary products are delivered in a secure, easy to access, and sustainable fashion, both from project conception until completion |

21. After considering the above options, the Delivery Working Group has decided to pursue the School-level provision as a preferred option. This approach will strengthen existing provision, utilise funding in a timely manner, reduce cash flow concerns and encourage collaboration between the Council, schools and charities.
22. To ensure that revenue funding is utilised by schools in accordance with the wishes of the Delivery Working Group, the Directorate of Learning and Skills can set up a cost code for schools to use when purchasing sanitary products from the delegated funding, the receipts of which are to be kept by schools and can be requested and audited by the Council as and when necessary. To assist, the Delivery Working Group have provided terms and conditions for this funding in order to inform schools of the requirements of the use of this funding. These are as follows:
  - That resources, including sanitary products and emergency clothing, are made freely available to all students;
  - That a selection of resources are made available based on the needs of the students;
  - That access to free sanitary resources is widely advertised and all students are aware of how these can be accessed;
  - That a named individual has lead responsibility in ensuring a good selection of stocks are maintained;
  - The students can access enough items to support more than their immediate needs;
  - That resources are easily accessible at identified / highlighted venues.

- That at the end of the financial year, any unspent funding is returned to the Learning and Skills Directorate Finance Manager for reallocation in line with the above terms and conditions.
23. As this funding is for all learners, and not just those on free school meals, it is proposed that the funding be distributed evenly across all schools in the Vale of Glamorgan based upon the most recent Pupil Level Annual School Census total numbers on roll for all Year 5 and above learners. Members also request that all schools be given a lump sum baseline to ensure a workable amount is given to each organisation. In line with the previous amounts given to schools as part of Cabinet Resolution C306, this is set at £30 per primary school, £100 per secondary school, and £130 for schools with both Primary and Secondary School intake (Ysgol Gymraeg Bro Morgannwg and Ysgol Y Deri).
  24. A breakdown of these allocations is attached at Appendix A. Due to the recent reorganisation of secondary school provision in Barry, it is proposed that the funding for Pencoedtre and Whitmore High Schools be combined by the Council and allocated by the executive Head teacher.
  25. To complement the provision in schools, the Delivery Working Group would also like to augment the remaining donation from Unison with some of the 2018/19 revenue grant and purchase a selection of sanitary products for distribution to food banks in the county. There are six Vale Foodbank locations in the Vale of Glamorgan (Coastlands Family Church, Cadoxton Methodist Church, St. Mary's Church on Holton Road, Bethel Baptist Church in Llantwit Major, Bethesda Chapel in Dinas Powys, and The Gathering Place in St. Athan). Members request that some supplies are also donated to Tabernacle Baptist Church in Penarth who also provide food parcels and household essentials, ensuring full coverage of the County.
  26. With regards to the capital funding, the Delivery Working Group considered static distribution methods, such as vending machines, cupboards and baskets. Members consider that supplying these products through the Capital funding is not an appropriate use of the Capital funding, as they do not synergise with existing solutions that could fulfil a similar job, would be difficult to incorporate within modern facilities and restrict the products available.
  27. Instead, the Group requested the funding be used to enhance cubicles in schools to ensure dignity for pupils affected by period poverty. Accordingly, the Council has sought Expressions of Interest from primary schools in the Vale of Glamorgan to identify toilets which required adjustments to cubicles, particularly those with low dividers and other privacy concerns. Schools were informed that this funding could not be used for a full refurbishment, and have to be balanced against the timescales included in the capital works programme. No secondary schools have been contacted, as all of these schools are considered by Property Services to have toilets that meet basic standards in terms of privacy for pupils.
  28. Based on the responses received and analysis undertaken by the Property Section, Holton Primary School has been identified as a potential recipient of the capital funding, as their toilet facilities for their eldest children consist of three, very narrow, cubicles, none of which are wide enough to house any sanitary hygiene facilities and one of the locks on the cubicles is broken with

spare parts no longer being made for this system. The Delivery Working Group subsequently visited this school on 18th October, 2018 to verify conditions at the school. The refurbishment of these facilities as part of the Education Capital Programme is not imminent.

29. As a result of the above, Officers from the Property Department have engaged with the Building Services Department to check the feasibility of works at Holton Road further to Committee and Cabinet approval to continue. It has been confirmed by the Commercial and Consultancy Manager that although the works would result in disturbance to the school, they could be completed during term time before the end of the financial year. He has also confirmed that the works can be completed within the budget available and that there are sufficient staff resources to carry out the work before the end of the financial year.

### **Resource Implications (Financial and Employment)**

30. All funding for the proposals of the Learning and Culture Scrutiny Committee Delivery Working Group for the provision of free sanitary products in schools in the Vale of Glamorgan has been received from Welsh Government and Unison. There is no expectation that this funding will continue beyond the 2019/20 financial year and to maintain provision, further work should be undertaken with schools, charities and Welsh Government to relieve period poverty.
31. All spend by schools on the delegated funding from Welsh Government will be cross referenced by the school against a Council provided cost-code to ensure that this money is used in accordance with the wishes of the Council, and records will be kept by schools for auditing purposes. This will be monitored as part of the regular School Finance Officer monitoring visits.

### **Sustainability and Climate Change Implications**

32. As part of its investigations, the Delivery Working Group has considered if schools provide the safe disposal of sanitary products to ensure waste is dealt with appropriately. The work to alleviate period poverty also contributes to a strong, healthy and just society where pupils and their families have better access to health services and enhanced education provision through better wellbeing.
33. The revenue funding from Welsh Government is available for the 2018/19 and 2019/20 financial years however has not been guaranteed beyond this date. As such, the funding cannot be considered sustainable.

### **Legal Implications (to Include Human Rights Implications)**

34. All tendered works will take place in accordance with financial regulations and the capital works framework.

### **Crime and Disorder Implications**

35. None as a direct result of this report.

### **Equal Opportunities Implications (to include Welsh Language issues)**

36. An Equality Impact Assessment has been carried out as part of the investigations of the Delivery Working Group. This is attached at Appendix B to

this report. The Equality Impact Assessment concludes that the project has potential to positively impact the wellbeing of learners across the Vale of Glamorgan and identified three actions to ensure that pupils with protected characteristics similarly benefitted. These are:

- Learners should be consulted through safe, open and as required anonymous methods;
- Provision should be made available to all pupils without barriers;
- Documentation should be gender neutral and bilingual.

Any positive or negative impacts on the protected characteristics can be recorded by School Wellbeing Leads and raised through the Wellbeing group.

### **Corporate/Service Objectives**

37. This project is in line with the following objectives of the Council's Corporate Plan:

An Inclusive and Safe Vale - citizens of the Vale of Glamorgan have a good quality life and fee part of the community.

An Aspirational and Culturally Vibrant Vale - all Vale of Glamorgan citizens have opportunities to achieve their potential.

### **Policy Framework and Budget**

38. This is a matter for Executive decision.

### **Consultation (including Ward Member Consultation)**

39. The impact of this provision is a county-wide and the needs assessment for Capital funding was also undertaken across all Primary Schools therefore Ward Member consultation is not required.

### **Relevant Scrutiny Committee**

40. Learning and Culture

### **Background Papers**

### **Contact Officer**

Mike Willmott, Assistant Democratic Services Officer

### **Officers Consulted**

Operational Manager, Strategy and Resources  
Prevention and Partnership Manager  
Commercial and Consultancy Manager  
Financial Manager, Learning and Skills Directorate

**Responsible Officer:**

Paula Ham, Director of Learning and Skills

| SCHOOL                          | Nursery - Year 3 | Year 4      | Year 5      | Year 6      | Secondary (incl post 16) | TOTAL        | Baseline         | Allocation               |
|---------------------------------|------------------|-------------|-------------|-------------|--------------------------|--------------|------------------|--------------------------|
|                                 |                  |             |             |             |                          |              |                  | Pupils year 5 + baseline |
| Bute Cottage Nursery            | 87               | 0           | 0           | 0           | 0                        | 87           | £0.00            | £0.00                    |
| Cogan Nursery                   | 60               | 0           | 0           | 0           | 0                        | 60           | £0.00            | £0.00                    |
| Albert Primary                  | 279              | 55          | 57          | 54          | 0                        | 445          | £30.00           | £82.92                   |
| All Saints C/W Primary          | 161              | 30          | 30          | 29          | 0                        | 250          | £30.00           | £58.13                   |
| Barry Island Primary            | 170              | 29          | 30          | 29          | 0                        | 258          | £30.00           | £58.13                   |
| Cadoxton Primary                | 325              | 59          | 52          | 58          | 0                        | 494          | £30.00           | £82.44                   |
| Cogan Primary                   | 120              | 30          | 30          | 26          | 0                        | 206          | £30.00           | £56.70                   |
| Colcot Primary                  | 215              | 38          | 48          | 29          | 0                        | 330          | £30.00           | £66.71                   |
| Dinas Powys Primary             | 293              | 61          | 60          | 59          | 0                        | 473          | £30.00           | £86.73                   |
| Evenlode Primary                | 242              | 60          | 86          | 60          | 0                        | 448          | £30.00           | £99.60                   |
| Fairfield Primary               | 184              | 46          | 46          | 45          | 0                        | 321          | £30.00           | £73.38                   |
| Gladstone Primary               | 284              | 56          | 54          | 54          | 0                        | 448          | £30.00           | £81.49                   |
| Gwenfo C/W Primary              | 157              | 29          | 27          | 28          | 0                        | 241          | £30.00           | £56.22                   |
| High Street Primary             | 151              | 26          | 33          | 25          | 0                        | 235          | £30.00           | £57.65                   |
| Holton Primary                  | 292              | 63          | 59          | 51          | 0                        | 465          | £30.00           | £82.44                   |
| Jenner Park Primary             | 155              | 28          | 29          | 27          | 0                        | 239          | £30.00           | £56.70                   |
| Llanarf Primary                 | 54               | 17          | 16          | 19          | 0                        | 106          | £30.00           | £46.69                   |
| Llandough Primary               | 151              | 32          | 34          | 31          | 0                        | 248          | £30.00           | £60.99                   |
| Llanfair Primary                | 80               | 19          | 20          | 19          | 0                        | 138          | £30.00           | £48.59                   |
| Llangan Primary                 | 83               | 12          | 15          | 16          | 0                        | 126          | £30.00           | £44.78                   |
| Llansannor C/W Primary          | 145              | 28          | 26          | 31          | 0                        | 230          | £30.00           | £57.17                   |
| Oakfield Primary (Vale)         | 132              | 21          | 18          | 20          | 0                        | 191          | £30.00           | £48.12                   |
| Palmerston Primary              | 155              | 29          | 30          | 28          | 0                        | 242          | £30.00           | £57.65                   |
| Pendoylan C/W Primary           | 128              | 25          | 30          | 28          | 0                        | 211          | £30.00           | £57.65                   |
| Peterston-Super-Ely C/W Primary | 119              | 25          | 25          | 24          | 0                        | 193          | £30.00           | £53.36                   |
| Rhws Primary                    | 285              | 46          | 58          | 46          | 0                        | 435          | £30.00           | £79.58                   |
| Romilly Primary                 | 472              | 89          | 90          | 90          | 0                        | 741          | £30.00           | £115.81                  |
| St Andrew's Major C/W Primary   | 144              | 29          | 30          | 30          | 0                        | 233          | £30.00           | £58.60                   |
| St Athan Primary                | 147              | 27          | 22          | 31          | 0                        | 227          | £30.00           | £55.27                   |
| St Bride's Major                | 135              | 26          | 30          | 28          | 0                        | 219          | £30.00           | £57.65                   |
| St David's C/W Primary (Vale)   | 96               | 21          | 14          | 28          | 0                        | 159          | £30.00           | £50.02                   |
| St Helen's RC Primary           | 207              | 43          | 42          | 49          | 0                        | 341          | £30.00           | £73.38                   |
| St Iltyds Primary               | 250              | 53          | 51          | 51          | 0                        | 405          | £30.00           | £78.62                   |
| St Joseph's RC Primary Penarth  | 139              | 31          | 27          | 25          | 0                        | 222          | £30.00           | £54.79                   |
| St Nicholas C/W Primary         | 71               | 18          | 18          | 18          | 0                        | 125          | £30.00           | £47.16                   |
| Sully Primary                   | 256              | 51          | 50          | 50          | 0                        | 407          | £30.00           | £77.67                   |
| Victoria Primary                | 329              | 60          | 61          | 80          | 0                        | 530          | £30.00           | £97.22                   |
| Wick and Marcross               | 79               | 11          | 13          | 16          | 0                        | 119          | £30.00           | £43.82                   |
| Y Bontfaen Primary              | 161              | 28          | 30          | 31          | 0                        | 250          | £30.00           | £59.08                   |
| Ysgol Gymraeg Dewi Sant         | 136              | 17          | 15          | 3           | 0                        | 171          | £30.00           | £38.58                   |
| Ysgol Gymraeg Gwaun y Nant      | 180              | 26          | 24          | 21          | 0                        | 251          | £30.00           | £51.45                   |
| Ysgol Gymraeg Pen-y-Garth       | 239              | 61          | 56          | 50          | 0                        | 406          | £30.00           | £80.53                   |
| Ysgol Iolo Morganwg             | 120              | 29          | 29          | 22          | 0                        | 200          | £30.00           | £54.31                   |
| Ysgol Sant Baruc                | 136              | 29          | 26          | 28          | 0                        | 219          | £30.00           | £55.74                   |
| Ysgol St Curig                  | 285              | 51          | 56          | 50          | 0                        | 442          | £30.00           | £80.53                   |
| Ysgol Y Draig                   | 219              | 51          | 47          | 53          | 0                        | 370          | £30.00           | £77.67                   |
| Ysgol Gymraeg Bro Morgannwg     | 158              | 29          | 29          | 22          | 882                      | 1120         | £130.00          | £574.77                  |
| Pencoedtre and Whitmore         | 0                | 0           | 0           | 0           | 1625                     | 1625         | £100.00          | £874.66                  |
| Cowbridge                       | 0                | 0           | 0           | 0           | 1515                     | 1515         | £100.00          | £822.22                  |
| Llantwit Major                  | 0                | 0           | 0           | 0           | 904                      | 904          | £100.00          | £530.95                  |
| St Cyres                        | 0                | 0           | 0           | 0           | 1143                     | 1143         | £100.00          | £644.88                  |
| St Richard Gwyn                 | 0                | 0           | 0           | 0           | 785                      | 785          | £100.00          | £474.22                  |
| Stanwell                        | 0                | 0           | 0           | 0           | 2000                     | 2000         | £100.00          | £1,053.43                |
| Ysgol Y Deri                    | 51               | 14          | 15          | 11          | 149                      | 240          | £130.00          | £213.43                  |
| Pupil Referral Unit             | 0                | 0           | 0           | 0           | 52                       | 52           | £100.00          | £124.79                  |
| <b>Grand Total</b>              | <b>8517</b>      | <b>1658</b> | <b>1688</b> | <b>1623</b> | <b>9055</b>              | <b>22541</b> | <b>£2,280.00</b> | <b>£8,175.05</b>         |

note - the split of the Pencoedtre and Whitmore allocation between sites will be determined by the executive Headteacher



# Equality Impact Assessment

Please click on headings to find [general guidance](#) or section guidance with an example. You will find supporting information in appendices at the end of the guidance.

When you start to assess your proposal, arrange to meet Tim Greaves, Equality Co-ordinator, for specific guidance. Send the completed form to him for a final check and so that he can publish it on our Vale of Glamorgan equality web pages.

Please also contact Tim Greaves if you need this equality impact assessment form in a different format.

## 1. [What are you assessing?](#)

|   |
|---|
| Provision of Free Sanitary Products in Schools in the Vale of Glamorgan |
|---|

## 2. [Who is responsible?](#)

|             |                     |                    |                                       |
|-------------|---------------------|--------------------|---------------------------------------|
| <b>Name</b> | Mike Willmott       | <b>Job Title</b>   | Assistant Democratic Services Officer |
| <b>Team</b> | Democratic Services | <b>Directorate</b> | Resources                             |

## 3. [When is the assessment being carried out?](#)

|                                    |                             |
|------------------------------------|-----------------------------|
| <b>Date of start of assessment</b> | 9 <sup>th</sup> August 2018 |
|------------------------------------|-----------------------------|

## 4. [Describe the proposal?](#)

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

Project Scope

- To investigate further the current approach to promoting and providing and disposing of sanitary products in primary and secondary schools throughout the Vale of Glamorgan;
- To gather evidence from students, staff and health professionals on the current

# Equality Impact Assessment

provision;

- To identify areas of good practice with the intention of providing education for all pupils and an understanding of the provision.
- To examine the means of distributing remaining and future funding from Welsh Government.

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

A request for consideration of matter was received by the Learning and Culture Scrutiny Committee from Councillor Mrs. J.M. Norman, Ward Member for Llantwit Major, calling "on the Scrutiny Committee to support in principle, subject to an officer's report the provision of free sanitary products, such as tampons and towels, in all schools in the County as an acknowledgement that they are as essential as toilet paper for personal hygiene for female pupils. The report to relate not only to the financial cost of the provision, but to the benefits of this investment in terms of promoting, dignity, equality, health and wellbeing and its effects on education and welfare of many of our pupils, and its effects on education and welfare of many of our pupils who live in low income families affected by poverty across the Vale of Glamorgan."

As a result, the Committee recommended the establishment of a small working group (namely a delivery group) to investigate this matter in full.

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

Welsh Government have provided the Council with £31,512 capital funding for the 2017/18 financial year and revenue funding of £8,666 for the 2018/19 and 2019/20 financial years. £1,170 has also been provided from Unison.

## What are the intended outcomes of the proposal?

The relief of period poverty in the Vale of Glamorgan Council through the provision of free sanitary products in the Vale of Glamorgan Council.

## Who does the proposal affect?

**Note:** If the proposal affects lesbian, gay, homosexual, or transgender people, ensure you explicitly include same-sex couples and use gender neutral language.

All Vale of Glamorgan pupils who menstruate, their family and friends.

## Will the proposal affect how other organisations work?

Some schools and charities are providing existing support, the Delivery Working Group

## Equality Impact Assessment

will meet with these stakeholders to ascertain how the Council can collaborate to ensure a suitable solution.

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

School attendance is anticipated to improve.

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

No.

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

The proposal will already significantly improve the wellbeing and equality of opportunity for those who suffer from period poverty

### **How will you achieve the proposed changes?**

To be determined by the Delivery Working Group before the end of the financial year.

### **Who will deliver the proposal?**

Once the Delivery Working Group has concluded its investigations, a report will be required to go to the Learning and Culture Scrutiny Committee and Cabinet. Following any subsequent approval, the Learning and Skills Directorate will be project sponsor in partnership with the schools providing sanitary provision.

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

Review consultation will be undertaken with pupils and staff to determine the efficacy of the project solution.

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

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

The Delivery Working Group will consult with a diverse range of Pupils from around the Vale of Glamorgan; separately they will meet with Staff at the school, and also charities who provide similar services.

# Equality Impact Assessment

## Consultation (with internal and external stakeholders)

The consultations detailed above will be carried out through face-to-face meetings, being mindful of learner confidentiality and stigma surrounding the topic.

Council staff who deal with education and wellbeing issues are also being consulted on an ad-hoc basis.

Other Local Authorities who are exploring similar provision have also been consulted.

## National data and research

Little in the way of national data and research has been undertaken on Period Poverty. Plan International UK has carried out a current UK-wide quantitative estimate of the extend of Period Poverty, further information is available here: <https://plan-uk.org/media-centre/plan-international-uks-research-on-period-poverty-and-stigma>

There is less information on how period poverty specifically affects the wellbeing of school children and their attendance at school.

## Local data and research

A small scale survey has been undertaken by the Learning and Skills Directorate. A number of responders struggle to afford sanitary care (45%), have needed to borrow sanitary products (up to 75%), and needed to improvise sanitary products (up to 73%).

Anecdotal data has also been received from local food banks which indicates that a significant minority suffer from period poverty in the Vale of Glamorgan.

## 6. How robust is the evidence?

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

The evidence is clear that period poverty has a negative impact on constituents in the Vale of Glamorgan. Any programmes to relieve the distress on pupils and their families will be of benefit.

### What are the gaps?

The full extent of period poverty is not known in the Vale of Glamorgan. There is evidence of a disparity between the existing support provided and usage reported by schools, and responses from learners themselves.

# Equality Impact Assessment

It is also not known to what extent period poverty affects school attendance.

## What will you do about this?

Meeting directly with affected learners in an informal consultation setting will help foster an honest, open discussion that should provide a more complete picture of the needs of those affected by period poverty. A completely anonymous online survey will also allow the Delivery Working Group to hear from other pupils who might be uncomfortable discussing the proposals face-to-face.

## What monitoring data will you collect?

- School Year of respondents
- Do you struggle to afford/have to borrow/improvise sanitary care?
- Do you feel you have been given enough information about periods and sanitary products?
- Is product branding a concern?
- What types of product is needed?
- Any additional comments

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

Once at the start of the project to establish a baseline, and at least once after implementation to monitor progress.

## Where will you publish monitoring data and reports?

The findings of the Delivery Working group will be reported to the Learning and Culture Scrutiny Committee, and subsequently to Cabinet for any Executive decisions. Updates will then be reported to the Scrutiny Committee.

## 7. [Impact](#)

### Is there an impact?

Period poverty affects the dignity, equality, health, wellbeing, education and welfare of many pupils in the Vale of Glamorgan.

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

# Equality Impact Assessment

## **evidence.**

Not applicable.

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

### **Age**

The project will support learners across primary and secondary schools.

### **Disability**

Provision of sanitary products must be accessible by all pupils.

**Gender reassignment, including gender identity** (ensure policies explicitly include same-sex couples and use gender neutral language)

Gender neutral language should be used, and access to sanitary products should not be restricted to one gender.

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

The project will not impact this characteristic.

### **Pregnancy and Maternity**

The project will not impact this characteristic.

### **Race**

The project will not impact this characteristic.

### **Religion and belief**

The project will not impact this characteristic.

### **Sex**

Gender neutral language should be used, and access to sanitary products should not be restricted to one gender.

**Sexual orientation** (ensure policies explicitly include same-sex couples and use gender neutral language)

The project will not impact this characteristic.

### **Welsh language**

# Equality Impact Assessment

The project will not impact this characteristic. All information distributed must be bilingual.

## **Human rights**

The project will positively affect human rights.

## **How do you know?**

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

### **Age**

A mix of provisions will be sent to primary and secondary schools to ensure that support is in place.

### **Disability**

If sanitary products are not easily accessible, learners with physical and mental impairment might struggle to access provision.

**Gender reassignment, including gender identity** (ensure policies explicitly include same-sex couples and use gender neutral language)

In the initial survey, learners indicated that transgender and transitioning pupils require sanitary products and would like the language to be used for information to be non-binary.

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

The project will not impact this characteristic.

### **Pregnancy and Maternity**

The project will not impact this characteristic.

### **Race**

The project will not impact this characteristic.

### **Religion and belief**

The project will not impact this characteristic.

### **Sex**

Feedback from initial survey.

**Sexual orientation** (ensure policies explicitly include same-sex couples and use gender

# Equality Impact Assessment

neutral language)

The project will not impact this characteristic.

## **Welsh language**

The project will not impact this characteristic.

## **Human rights**

The Equality and Human Rights Commission has stated that the impact of the similar “Ending Period Poverty Consultation” by Monica Lennon MSP would have a positive impact on equality, taking account of the protected characteristics as laid out under the Equality Act 2010.

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

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

### **Age**

Learners are to be informed that regardless of age, sanitary products are available free of charge and with no restriction.

### **Disability**

Discussions to be held with staff with the portfolio of disabled access/champion.

**Gender reassignment, including gender identity** (ensure policies explicitly include same-sex couples and use gender neutral language)

Gender neutral language should be used, and access to sanitary products should not be restricted to one gender.

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

The project will not impact this characteristic.

### **Pregnancy and Maternity**

The project will not impact this characteristic.

### **Race**

The project will not impact this characteristic.

### **Religion and belief**

The project will not impact this characteristic.



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## **Sex**

Gender neutral language should be used, and access to sanitary products should not be restricted to one gender.

**Sexual orientation** (ensure policies explicitly include same-sex couples and use gender neutral language)

The project will not impact this characteristic.

## **Welsh language**

The project will not impact this characteristic.

## **Human rights**

Ensure that information distributed reflects the Equalities and Human Rights benefits and necessity of providing free sanitary products.

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

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

### **Age**

Appropriate information be distributed to pupils at an early age.

### **Disability**

Provision of sanitary products must be accessible by all pupils.

**Gender reassignment, including gender identity** (ensure policies explicitly include same-sex couples and use gender neutral language)

Ensure the learners with this protected characteristic are consulted.

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

The project will not impact this characteristic.

### **Pregnancy and Maternity**

The project will not impact this characteristic.

### **Race**

The project will not impact this characteristic.

# Equality Impact Assessment

## Religion and belief

The project will not impact this characteristic.

## Sex

Ensure the learners with this protected characteristic are consulted.

**Sexual orientation** (ensure policies explicitly include same-sex couples and use gender neutral language)

The project will not impact this characteristic.

## Welsh language

The project will not impact this characteristic.

## Human rights

Ensure that none of the protected characteristics listed above are negatively affected.

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

Not applicable.

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

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

### Age

Positive. Pupils are unlikely to have access to their own income, therefore are at a risk of period poverty. This project aims to reduce this burden upon learners, their families, and friends.

### Disability

Positive. Learners with mental and physical impairment are just as likely to experience period poverty, and the proposed provision may help reduce the effects.

**Gender reassignment, including gender identity** (ensure policies explicitly include same-sex couples and use gender neutral language)

Positive. Under the current system transgender learners may experience difficulty in

# Equality Impact Assessment

accessing sanitary products, therefore easy access to all who menstruate will assist pupils with this protected characteristic.

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

Neutral. The project will not impact this characteristic.

## **Pregnancy and Maternity**

Neutral. The project will not impact this characteristic.

## **Race**

Neutral. The project will not impact this characteristic.

## **Religion and belief**

Neutral. The project will not impact this characteristic.

## **Sex**

Positive. Under the current system transgender learners may experience difficulty in accessing sanitary products, therefore easy access to all who menstruate will assist pupils with this protected characteristic.

**Sexual orientation** (ensure policies explicitly include same-sex couples and use gender neutral language)

Neutral. The project will not impact this characteristic.

## **Welsh language**

Neutral. The project will not impact this characteristic.

## **Human rights**

Positive. The project will positively affect human rights and the protected characteristics detailed above.

## **8. Monitoring ongoing impact**

### **Date you will monitor progress**

A second survey will be sent out once the project solutions have been installed. This will be at the end of the first term after the new financial year, by which time capital solutions will have been procured and usage will have occurred.

# Equality Impact Assessment

## Measures that you will monitor

Generally:

How has take up been? Are any groups of pupils not engaging with the provision solution? What is the turnover for stocks? Has there been any misuse?

Through survey (to compare against baseline):

- School Year of respondents
- Do you struggle to afford/have to borrow/improvise sanitary care?
- Do you feel you have been given enough information about periods and sanitary products?
- Is product branding a concern?
- What types of product is needed?
- Any additional comments

## Date you will review implemented proposal and its impact

Following the above monitoring exercise.

# Equality Impact Assessment

## 9. Further action as a result of this equality impact assessment

| Possible Outcomes          | Say which applies  |
|----------------------------|--|
| No major change            | Does not apply.  |
| Adjust the policy          | <p>The project has the potential to positively impact the wellbeing of many learners across the Vale of Glamorgan. To ensure that pupils with protected characteristics similarly benefit from the project, the following actions should be undertaken:</p> <ul style="list-style-type: none"> <li>• Learners should be consulted through safe, open, and as required anonymous methods.</li> <li>• Provision should be made available to all pupils without barriers.</li> <li>• Documentation should be gender neutral and bilingual.</li> </ul> |
| Continue the policy        | Does not apply.  |
| Stop and remove the policy | Does not apply.  |

## 10. Outcomes and Actions

|  |
|--|
| <p><b>Recommend actions to senior management team</b></p> <p>That the investigations of the Task and Finish Group continue.</p>  |
| <p><b>Outcome following formal consideration of proposal by senior management team</b></p> <p>Following the investigations of the Task and Finish Group, the report to the Learning and Culture Scrutiny Committee will include a review of potential equality impacts for the proposed solution, followed by a monitoring exercise after a term's usage of the provision.</p> |

## 11. Important Note

|   |
|---|
| <p><b>Where you have identified impacts, you must detail this in your Cabinet report when seeking approval for your proposal.</b></p> |
|---|

# Equality Impact Assessment

## 12. [Publication](#)

**Where will you publish your approved proposal and equality impact assessment?**

As part of the report to the Learning and Culture Scrutiny Committee, which will be subsequently referred to Cabinet.

**In addition to anywhere you intend to publish your approved proposal and equality impact assessment, you must send a copy to Tim Greaves, Equality Co-ordinator, to publish on the equality pages of the Vale of Glamorgan website.**

## 13. [Authorisation](#)

|                                   |  |
|-----------------------------------|--|
| <b>Approved by (name)</b>         |  |
| <b>Job Title (senior manager)</b> |  |
| <b>Date of approval</b>           |  |
| <b>Date of review</b>             |  |