

Draft Equality Impact Assessment (EIA) – Part 1

Policy title and purpose (brief outline):	Revised eligibility criteria for free school meals in Wales due to the rollout of Universal Credit
Name of official:	Lowri Reed
Department:	Education Directorate Education and Public Services
Date:	23 May 2018
Signature:	

1. Please provide a brief description of the policy/decision.

For example what is the overall objective of the policy/decision, what are the stated aims (including who the intended beneficiaries are), a broad description of how this will be achieved, what the measure of success will be, and the time frame for achieving this?

Free school meals are a 'passported benefit' linked to a number of benefits, such as income-based Jobseeker's Allowance (JSA) and Child Tax Credit, which are being replaced by Universal Credit¹. The current eligibility criteria are mainly based on receipt of out-of-work benefits. However, those who are in work and claiming Child Tax Credit (but not working enough hours to claim Working Tax Credit) are also entitled to free school meals.

In January 2017, there were around 76,200 pupils known to be eligible for free school meals in Wales, which is equivalent to 16 per cent of pupils in maintained schools².

As there is no distinction between out-of-work and in-work benefits under Universal Credit, a lot of extra in-work claimants on low incomes would become entitled to free school meals under a blanket criteria for all Universal Credit claimants. Although a blanket criteria has been introduced as a temporary measure, this is not currently an issue as the rollout of Universal Credit to families in Wales is quite limited. However, this will change as the rollout progresses.

Imposing an annualised net earnings threshold³ for families on Universal Credit is regarded as the fairest and simplest solution. Such a threshold will ensure that the poorest in-work parents qualify for free school meals. Currently, there are very low income families (in receipt of Working Tax Credit) who are not entitled to free school meals because of the number of hours they work. An earnings based criteria will resolve this issue.

If we do not set a threshold, we will create unaffordable costs. For example, if no earnings threshold is put in place by the time Universal Credit is fully rolled out (currently expected to be in 2022), we estimate that around half of all pupils would be eligible for free school meals in Wales (compared to 16 per cent in January 2017).

¹ Universal Credit is replacing six existing means-tested benefits – Housing Benefit, Income Support, Child Tax Credit, Working Tax Credit, income-based Jobseeker's Allowance, and income-related Employment and Support Allowance.

² Source: Pupil Level Annual School Census (PLASC) data. Pupils are recorded as eligible if they have applied for free school meals to the local authority and (1) the relevant authority has confirmed their eligibility, or (2) final confirmation of eligibility is still awaited but the school has seen documents that strongly indicate eligibility. There are also some families (not included in these statistics) who may be entitled to free school meals based on their benefit receipt, but who have not applied for free school meals with their local authority.

³ Net income from employee earnings and declared self-employment earnings would be taken into account. Net earned income is defined as household income after taxes and deductions. It does not include income from Universal Credit or other benefits.

No additional funding has been provided to the Welsh Government to manage the impact of the rollout of Universal Credit on FSM.

Using a net earned income threshold is consistent with the approach taken by other government departments and devolved administrations in updating eligibility criteria for passported benefits under Universal Credit. For example, in April 2018, England's Department for Education (DfE) introduced a net earnings threshold of £7,400 per annum to assess a household's eligibility for free school meals under Universal Credit in England⁴. Similarly, for free school meal eligibility in Scotland, the Scottish Government introduced a net earnings threshold of £610 per month (equivalent to £7,320 per annum) in August 2017⁵.

We are seeking to introduce an annualised net earnings threshold of £7,400 in respect assessing the FSM entitlement for UC claimants. We plan to introduce this threshold in January 2019 (before UC is fully rolled out). The objectives of this policy are to revise eligibility criteria for free school meals, ensuring:

- those most in need are able to access free school meals, with the aim of improving health and educational outcomes;
- the affordability of free school meals for local authorities, which would need to be funded by the Welsh Government; and,
- the affordability of any new related financial burdens for the Welsh Government that might arise.

Overall, an annualised net earnings threshold of £7,400 is estimated to increase the number of children benefitting from free school meals in Wales by around 3,000 by the time Universal Credit is fully rolled out. This represents the estimated net change in the cohort size due to the new eligibility criteria proposed. It is relative to the estimated number of children that would have received free school meals under the benefit system that Universal Credit is replacing.

We also propose to put in place a transitional protection offer, which would ensure that no child would lose entitlement to free school meals during the rollout of Universal Credit (and beyond for some children).

Information on the number of children eligible for FSM is captured during the Pupil Level Annual School Census (PLASC), so we will monitor this data to assess the impact of the new eligibility criteria on the size of the FSM cohort.

We plan to keep the proposed threshold arrangements under review until the end of the rollout of UC in 2022.

⁴ <https://www.gov.uk/government/consultations/eligibility-for-free-school-meals-and-the-early-years-pupil-premium-under-universal-credit>

⁵ <http://www.gov.scot/Topics/Education/Schools/HLivi/schoolmeals/FreeSchoolMeals>

2. We have a legal duty to engage with people with protected characteristics under the Equality Act 2010 (please refer to Annex A of the EIA guidance) identified as being relevant to the policy. What steps have you taken to engage with stakeholders, both internally and externally?

In developing this policy we have consulted with Welsh Government officials from:

- Education Directorate
- Legislation Branch in the EPS Operations Team
- Legal Services
- Local Government Finance
- Equality and Prosperity Division
- Knowledge and Analytical Services
- Welsh Treasury

We have also liaised with other government departments, including:

- The Department for Work and Pensions (DWP)
- HM Revenue and Customs (HMRC)
- The Department for Education (DfE) in England
- The Scottish Government
- Department of Education Northern Ireland (DENI)

We will formally consult with stakeholders including local authorities, education consortia and schools, and third sector organisations, in particular those that represent the interest of children and young people.

It is not considered appropriate to consult directly with children and young people who are the recipients of FSM. Not only is this a very technical subject area, but some children and young people might not be aware that they, or their classmates, receive FSM. There is a risk that in highlighting this issue directly with children or young people, it will cause distress and make them worry about household finances and/or create stigma for those that receive benefits/support payments and passported benefits such as FSM.

In view of this, during the consultation period we will offer to meet with third sector organisations that work with and on behalf of children and young people, and also those that represent vulnerable families who will be most affected by the change.

The consultation will be available online and will be highlighted to stakeholders through e-mail and via Dysg.

3. Your decisions must be based on robust evidence. What evidence base have you used? Please list the source of this evidence e.g. National Survey for Wales. Do you consider the evidence to be strong, satisfactory or weak and are there any gaps in evidence?

We have used the following data sources for our analysis:

- DWP's Family Resources Survey 2015-16⁶ (FRS)
- HM Revenue and Customs (HMRC) tax credit data
- HM Revenue & Customs (HMRC) tax credit data
- Pupil Level Annual School Census (PLASC)⁷ data
- Economic forecasts (e.g. Office for Budget Responsibility forecasts of earnings growth and employment rates)
- DWP's Households Below Average Income data
- DWP statistics on the number of households on Universal Credit and in receipt of payment, by family type, for Wales.

The data underpinning our analysis and the models used are the best available, and are regarded to be satisfactory. However, there is a lot of uncertainty surrounding our estimates of the impact of the policy due to factors such as behavioural change. We are targeting the group of households most affected by reforms, including changes to work incentives under Universal Credit and the National Living Wage. We cannot predict the behaviour of individuals as they migrate onto Universal Credit and the new free school meals earnings threshold might also introduce its own behavioural effects. In addition, economic forecasts (e.g. Office for Budget Responsibility forecasts of earnings growth and employment rates) and the underlying data (e.g. Family Resources Survey) used in the models for this analysis will continue to be updated. New data and forecasts will have an effect on our estimates of the potential impact of new eligibility criteria for free school meals. Therefore, our estimates are subject to change⁸.

Given the uncertainty surrounding such effects, we are therefore proposing to keep the earnings threshold under review.

It is important to note any opportunities you have identified that could advance or promote equality.

⁶ <https://www.gov.uk/government/collections/family-resources-survey--2>

⁷ <https://statswales.gov.wales/Catalogue/Education-and-Skills/Schools-and-Teachers/Schools-Census/Pupil-Level-Annual-School-Census> This provides a breakdown of the number of pupils that are eligible for free school meals by their gender, age and ethnic background. Information on other protected characteristics is not collected.

⁸ Further information can be found in the draft Regulatory Impact Assessment Summary published alongside this Equality Impact Assessment.

Impact

Please complete the next section to show how this policy / decision / practice could have an impact (positive or negative) on the protected groups under the Equality Act 2010 (refer to the EIA guidance document for more information).

Lack of evidence is not a reason for *not* progressing to carrying out an EIA. Please highlight any gaps in evidence that you have identified and explain how/if you intend to fill these gaps.

Given that FSM policy is targeted at the most disadvantaged families, evidence has been provided on households with below average incomes by protected characteristic (where possible), as well as PLASC data on the number of pupils eFSM by gender, age and ethnic background.

This is a draft EIA, which we will revise as further evidence is made available.

4.1 Do you think this policy / decision / practice will have a positive or negative impact on people because of their age?

Age	Positive	Negative	None / Negligible	Reasons for your decision (including evidence) / How might it impact?
Younger people (Children and young people, up to 18)			Not applicable	<p>The public sector equality duty, so far as it concerns age, does not apply to the exercise of a function relating to the provision of benefits, facilities or services to pupils in schools⁹.</p> <p>In accordance with Schedule 18 , paragraph 1, section 149 of the Equality Act 2010 (the public sector equality duty), so far as it relates to age, does not apply to the exercise of functions relating to :</p> <ul style="list-style-type: none"> (a) the provision of education to pupils in schools; (b) the provision of benefits, facilities or services to pupils in schools; (c) the provision of accommodation, benefits, facilities or services in community homes pursuant to section 53(1) of the Children Act 1989; (d) The provision of accommodation, benefits,

⁹ Equalities Act 2010

			<p>facilities or services pursuant to arrangement under section 82(5) of that Act (arrangements by the Secretary of State relating to the accommodation of children);</p> <p>(e) the provision of accommodation, benefits, facilities or services in residential establishments pursuant to section 26(1)(b) of the Children (Scotland) Act.</p> <p>However, by way of background, the School Census 2017 indicated that a higher proportion of younger children of compulsory school age¹⁰ were likely to be eligible for FSM, and that overall, the proportion declines as children get older (with the exception of those aged 18 or over). This may reflect parents re-entering the labour market as children grow older:</p> <ul style="list-style-type: none"> • 3 or under – 4.7% • age 4 - 19.2% • age 5 - 19.3% • age 6 - 19.0% • age 7 - 18.7% • age 8 - 18.3% • age 9 - 18.0% • age 10 - 17.4% • age 11 - 17.9% • age 12 - 17.3% • age 13 - 16.9% • age 14 - 16.8% • age 15 - 15.8% • age 16 - 8.1% • age 17 - 6.8% • 18 or over – 15.6% <p>We will continue to monitor PLASC data which includes a breakdown by age.</p>
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¹⁰ Compulsory school ages are between 5 and 15.



People 18- 50			Negligible impact due to age	Evidence ¹¹ shows that people tend to see their earnings rise during the course of their working lives, meaning they are more likely to have higher incomes towards the end of working life (and may therefore be more likely to be above the earned income threshold).
Older people (50+)			Negligible impact due to age	Older people are less likely to be parents of school aged children. As regards grandparents who have taken on parental responsibility, the guarantee element of State Pension Credit will remain as eligibility criteria for FSM.

¹¹ Browne, J. (2015) The Impact of the UK Government's Tax, Welfare and Minimum Wage Reforms in Wales. A report for the Institute for Fiscal Studies
<https://www.ifs.org.uk/uploads/publications/comms/R110.pdf>



4.2 Because they are disabled?

Impairment	Positive	Negative	None / Negligible	Reason for your decision (including evidence) / How might it impact?
Visual impairment			Negligible impact due to visual impairment	Families with a disabled person in the household are at a higher risk of being in poverty than those without a disabled person in the household ¹² . Previous analysis of Labour Force Survey data indicated a pay gap of 50 pence an hour in Wales between disabled and non-disabled people; however, this gap was not statistically significant ¹³ . Previous analysis of the Annual Population Survey (APS) between 2004 and 2009 indicated that hourly earnings were lower for people with a work-limiting condition/impairment. Earnings were higher, however, for those with a DDA disability (as then defined) which is not work-limiting than for employees who did not report a disability. This was attributed in part to 'a favourable occupational mix', as large differences were observed between wages for different occupations ¹⁴ . From the data available it is not possible to identify whether or not pupils
Hearing impairment			Negligible impact due to hearing impairment	
Physically disabled			Negligible impact due to physical disability	
Learning disability			Negligible impact due to learning disability	
Mental health problem			Negligible impact due to mental health problems	
Other impairments issues			Negligible impact due to other impairment issues	

¹² [Analysis by the Joseph Rowntree Foundation on poverty in the UK](#) found that when the extra costs of disability are partially accounted for, half of all people in poverty are either disabled, or in a household with a disabled person. Welsh Government analysis of DWP HBAI data published in 2017 shows that within Wales, the risk of being in relative income poverty for children is higher if there is disability within the household (36%), compared to households with no disability (27%).

¹³ EHRC, 2016a (rev.). Domain G: Productive and valued activities. Is Britain Fairer? Evidence Paper Series. Manchester: EHRC.

¹⁴ WISERD (2011) An Anatomy of Economic Inequality in Wales. Cardiff: Cardiff University.

				<p>receiving FSM have a disability, or whether their parents have a disability.</p> <p>Some of the legacy benefits that FSM eligibility criteria is currently linked to are sickness and disability benefits (e.g. Employment and Support Allowance), and UC also provides support for low income families with a disability or health condition.</p> <p>Although some of the earnings data is mixed, given the links between poverty and disability, and the fact that this policy is aiming to target the most disadvantaged families, this suggests that families with a disabled person may be more likely to have earnings that fall below the FSM threshold .</p>
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4.3 Because of their gender (man or woman)?

Gender	Positive	Negative	None / Negligible	Reason for your decision (including evidence)/ How might it impact?						
Male			Negligible	<p>Gender is not a consideration in eligibility criteria for FSM.</p> <p>The gender split of those pupils known to be eligible for FSM is as follows:</p> <table border="1"> <tr> <td>Male</td> <td>39,102</td> <td>51%</td> </tr> <tr> <td>Female</td> <td>37,122</td> <td>49%</td> </tr> </table> <p><i>Source: 2017 School Census</i></p> <p>The gender split is in line with the national trend for all pupils.</p> <p>Although we do not expect there to be any negative impact of the new eligibility criteria on gender, we will monitor PLASC data which shows a breakdown by gender. We expect the number of male and female pupils to increase.</p>	Male	39,102	51%	Female	37,122	49%
Male	39,102	51%								
Female	37,122	49%								
Female	Our analysis suggests that the majority of those gaining entitlement will be children in single parent households, and 90% of single parent households are female.		Negligible	<p>As regards the impact on parents by gender, we can look at data on the gender pay gap. On the basis of full-time hourly earnings excluding overtime, male employees earned 6.3% more than female employees in 2017 in Wales, down from 7.9% in 2016. (Source: Annual Survey of Hours and Earnings, Office for National Statistics).</p> <p>In addition, Welsh Government analysis of DWP households below average income data for Wales for the period 2013-14 and 2015-16 showed that, within Wales, 46% of single working-age adults with children were in relative income poverty. These households were most at risk of being in relative income poverty when compared with</p>						

				<p>other reported household types. Data from the 2011 Census showed that 90% of single parent households in Wales are female parents.</p> <p>Our analysis suggests that the majority of those gaining entitlement to FSM will be children in single parent households (most of whom would be expected to be female).</p>
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4.4 Because they are transgender?

Transgender	Positive	Negative	None / Negligible	Reason for your decision (including evidence) / How might it impact?
			No impact due to being transgender	<p>Being transgender is not a consideration in eligibility criteria for FSM.</p> <p>We have no data available on FSM pupils or parents who are transgender. We are not aware of any other evidence that would suggest that the proposed changes to FSM eligibility criteria would differentially affect pupils or parents who are transgender.</p>

4.5 Because of their marriage or civil partnership?

Marriage and Civil Partnership	Positive	Negative	None / Negligible	Reason for your decision (including evidence)/ How might it impact?
Marriage			Negligible	<p>Marriage/civil partnership is not a consideration in FSM eligibility criteria.</p> <p>Numbers in civil partnership/married under the age of 20 are relatively low¹⁵.</p> <p>As regards parents, analysis of DWP households below average income data for Wales for the period 2013-14 and 2015-16¹⁶ showed that 23% of working-age couples with children were in relative income poverty. This compared to 46% of single working-age adults with children.</p>
Civil Partnership			Negligible	<p>The Equality Act 2010 refers to marriage and civil partnership specifically in relation to discrimination at work/ being treated differently by your employer due to being married or in a civil partnership, so this is not applicable in this context.</p>

¹⁵ <https://cy.ons.gov.uk/peoplepopulationandcommunity/birthsdeathsandmarriages/marriagecohabitationandcivilpartnerships/datasets/ageandpreviousmaritalstatusatmarriage>
<https://cy.ons.gov.uk/peoplepopulationandcommunity/birthsdeathsandmarriages/marriagecohabitationandcivilpartnerships/datasets/civilpartnershipstatisticsunitedkingdomcivilpartnershipformations>

¹⁶ Stats Wales - Working age adults in relative income poverty by family type 2013-14 and 2015-16. (Source: <https://statswales.gov.wales/Catalogue/Community-Safety-and-Social-Inclusion/Poverty/workingageadultsinrelativeincomepoverty-by-familytype>)

4.6 Because of their pregnancy or maternity?

Pregnancy and Maternity	Positive	Negative	None / Negligible	Reason for your decision (including evidence) / How might it impact?
Pregnancy			None	<p>Pregnancy is not a consideration in FSM eligibility criteria.</p> <p>We have no data available on eFSM pupils who are pregnant. We are not aware of any other evidence that would suggest that the proposed changes to FSM eligibility criteria would differentially affect pupils or parents who are pregnant.</p>
Maternity (the period after birth)			Negligible	<p>Maternity is not a consideration in FSM eligibility criteria. We have no maternity data available on eFSM pupils. However a young person might not attend school and be able to access FSM if recovering from the birth/taking care of the baby at home.</p> <p>We are not aware of any evidence that would suggest that the proposed changes to FSM eligibility criteria would differentially affect maternity.</p>

4.7 Because of their race?

Race	Positive	Negative	None / Negligible	Reason for your decision (including evidence) / How might it impact?
Ethnic minority people e.g. Asian, Black,	Positive			<p>Children living in households in Wales where the head of the household was from a non-white ethnic group were twice as likely to be in relative income poverty as children in households where the head of the household was from a white ethnic group (i.e. 62% compared to 29%)¹⁷. We therefore expect that children living in households where the head of the household is from a non-white ethnic group will be more likely to have earnings below the proposed earned income threshold, and more likely to become eligible for free school meals.</p> <p>School Census data on pupils aged 5 and over eligible for FSM in Wales by ethnic background (2016/17) showed the majority (88%) were White-British, which is in line with the breakdown for all pupils.</p> <p>We will monitor the PLASC data breakdown by ethnicity.</p>
National Origin (e.g. Welsh, English)			Negligible	
Gypsies and Travellers			Negligible	
Migrants			Negligible	
Others			Negligible	
Asylum Seeker and Refugees			None	

¹⁷ Stats Wales - Children in relative income poverty by ethnic group of head of household, 2011-12 to 2015-16.

(Source: <https://statswales.gov.wales/Catalogue/Community-Safety-and-Social-Inclusion/Poverty/childreninrelativeincomepoverty-by-ethnicgroupofheadofhousehold>)

4.8 Because of their religion and belief or non-belief?

Religion and belief or non – belief	Positive	Negative	None / Negligible	Reason for your decision (including evidence)/ How might it impact?
Different religious groups including Muslims, Jews, Christians, Sikhs, Buddhists, Hindus, Others (please specify)	Potentially positive for some religious groups – Muslims and Sikhs		Negligible impact on other religious groups	Religion, belief and non-belief are not considerations in eligibility criteria for FSM. The proposed FSM eligibility criteria will apply in a consistent manner to all schools/settings/children. This includes faith schools. As regards households' religion and belief or non-belief, information from the 2011 Census ¹⁸ showed that 66% of Muslims and 56% of Sikhs and those stating no religion lived in the most deprived half of Wales. We would expect these religious groups to be more likely to have earnings below the proposed threshold for FSM.
Belief e.g. Humanists			Negligible	Those stating no religion also had the highest proportion of 'one family households'. (This links to 4.5, Marriage and Civil Partnership).
Non-belief	Positive			

¹⁸ A statistical focus on religion in Wales, 2011 Census:
<http://gov.wales/docs/statistics/2015/151027-statistical-focus-religion-2011-census-en.pdf>

4.9 Because of their sexual orientation?

Sexual Orientation	Positive	Negative	None / Negligible	Reason for your decision (including evidence)/ How might it impact?
Gay men			None	Sexuality of parent or child would is not a consideration in FSM eligibility criteria.
Lesbians			None	We have no data available on the sexuality of FSM pupils or their parents.
Bi-sexual			None	We are not aware of any evidence that would suggest that the proposed changes to FSM eligibility criteria would differentially affect pupils or parents because of their sexual orientation

4.10 Do you think that this policy will have a positive or negative impact on people’s human rights?

Human Rights	Positive	Negative	None / Negligible	Reason for your decision (including evidence) / How might it impact?
Human Rights including Human Rights Act and UN Conventions			Negligible	Amending the FSM eligibility criteria has no impact on Articles 2 – 14 ¹⁹ , or the following protocols: <ul style="list-style-type: none"> • Protocol 1, Articles 1 (the right to peaceful enjoyment of possessions) and 3 (the right to free elections). • Protocol 13, Article 1 (abolition of the death penalty)

If you have identified any impacts (other than negligible ones), positive or negative, on any group with protected characteristics, please complete Part 2.

Only if there are no or negligible positive or negative impacts should you go straight to part 2 and sign off the EIA.

¹⁹ Article 2 - The right to life; Article 3 - Freedom from torture or de-grading treatment; Article 4 - Prohibition of slavery and forced labour; Article 5 - The right to liberty and security; Article 6 - The right to a fair trial; Article 7 - No punishment without lawful authority; Article 8 - The right to respect for private and family life and correspondence; Article 9 - Freedom of thought, belief and religion; Article 10 - Freedom of expression; Article 11 - Freedom of assembly and association; Article 12 - The right to marry and found a family; Article 13 - The right to an effective remedy; Article 14 - Prohibition of Discrimination in respect of these rights and freedoms.



Equality Impact Assessment – Part 2

1. Building on the evidence you gathered and considered in Part 1, please consider the following:

1.1 How could, or does, the policy help advance / promote equality of opportunity?

For example, positive measures designed to address disadvantage and reach different communities or protected groups?

An annualised net earnings threshold of £7,400 is estimated to increase the number of children benefitting from free school meals in Wales by around 3,000 by the time Universal Credit is fully rolled out. This will enable eligible pupils to have equal opportunity to participate and succeed in school. We also propose introducing measures which will protect families from losing entitlement to free school meals for a limited period of time, helping to avoid hardship by giving them more time to adjust.

Given the assessment above, we expect that children and parents with certain protected characteristics (disabilities, those in non-white ethnic groups, and Muslims, Sikhs and those with no religion) would be more likely to benefit from the new eligibility criteria than other groups. We have no evidence to indicate that the new proposals for free school meals eligibility criteria would have a negative impact on other protected characteristics.

1.2 How could / does the policy / decision help to eliminate unlawful discrimination, harassment or victimisation?

The consistent application of a standard eligibility criteria based on receipt of UC with an earned income threshold reduces the risk of discrimination when issuing funding for FSM.

Support under Part VI of the Immigration and Asylum Act 1999 will remain a qualifying criteria for FSM, so asylum seekers and refugees will not be disadvantaged by the change in policy.

1.3 How could/does the policy impact on advancing / promoting good relations and wider community cohesion?

Not applicable

2. Strengthening the policy

2.1 If the policy is likely to have a negative effect ('adverse impact') on any of the protected groups or good relations, what are the reasons for this?

What practical changes/actions could help reduce or remove any negative impacts identified in Part 1?

We have no evidence to suggest that the new eligibility criteria will be less redistributive than the current criteria.

No significant concerns/ negative impacts have been identified in Part 1 of this EIA.

2.2 If no action is to be taken to remove or mitigate negative / adverse impact, please justify why.

(Please remember that if you have identified unlawful discrimination (immediate or potential) as a result of the policy, the policy must be changed or revised.)

Not applicable.

3. Monitoring, evaluating and reviewing

How will you monitor the impact and effectiveness of the policy?

List details of any follow-up work that will be undertaken in relation to the policy (e.g. consultations, specific monitoring etc).

Officials will continue to monitor equality impacts and revisit the EIA. In the short term we will take into account responses from the consultation. As regards longer term monitoring, we will look at PLASC data and consider what additional data/ evidence we could obtain to help us assess how the policy is impacting people with protected characteristics or vulnerable groups.

The results of all impact assessments where the impact is significant will be published on the Welsh Government's website.

4. Declaration

***Please delete as appropriate:**

The policy ~~*does/~~ does not have a significant impact upon equality issues

Official completing the EIA

Name:

Lowri Reed

Department:

Education Directorate

Education and Public Services

Date:

23 May 2018

Signature:



Head of Division (Sign-off)

Name:

Ruth Conway

Job title and department:

Deputy Director, Support for Learners Division

Date:

23 May 2018

Signature:

Robert G. ...

Review Date: