

Equality, Diversity and Inclusion Policy

Review

Formal Review Cycle			
Latest Formal Review (date)	October 2018	Next Formal Review Due (date)	July 2021
Policy Owner	Vice Principal Student Services and Registry		
Policy Author			

Approvals

Board of Corp Y/N	Y	Committee		Date Board approved	October 2018
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Publication

Website Y/N	Y	Intranet Y/N	Y	Student VLE Y/N	Y	Other	
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Change History

Version	Date Reviewed/ Revised	Description of Change	Reviewed by	Approved by

Equality, Diversity and Inclusion Policy

1. Policy Statement

The College actively promotes equality and diversity in all aspects of its work and aims to provide an environment where all individuals have the opportunity to achieve their full potential with a feeling of self-esteem. It will eliminate unfair discrimination through a zero tolerance approach, regular target setting and monitoring and the development of positive action programmes.

This Policy describes how we intend to fulfil our legal duties to eliminate unlawful discrimination and harassment; advance equality of opportunity and foster good relations between people who share a protected characteristic and those who do not.

The protected characteristics under the Equality Act 2010 are: race, disability, sex, age, religion or belief, sexual orientation, pregnancy and maternity, marriage and civil partnership and gender identity. The Policy is extended to consider the impact of possible socio-economic factors and disadvantages that face our staff, students and our local communities.

The policy also incorporates the College's commitment under the Prevent Duty and the need to have 'due regard' to prevent people being drawn into terrorism. We embrace and champion British Values through our College values which are shared with members of the college community.

The principles of this Policy apply to all members of the College community including students, staff, the Corporation, parents or carers, partners, visitors and community members.

2. Scope

- 2.1 The College is committed to treating all of its staff, students and stakeholders fairly and equitably regardless of a protected characteristic including: age, race or ethnicity, disability, gender, gender preference, sexual orientation, religious beliefs, non-belief, membership of professional associations or trade unions, marital status, family responsibility and socio-economic standing. The College will ensure that no unjustifiable requirements or conditions are imposed that could disadvantage individuals on any of the above grounds.
- 2.1 We will be proactive in promoting equality by embracing, valuing and recognising difference including cultural difference.
- 2.3 We are committed to fulfilling a wide range of equality objectives to tackle all facets of inequality and discrimination, to create genuine equality of opportunity and foster good relations between people who share a protected characteristic and those who do not. In realising these commitments, the College expresses its opposition to all forms of discrimination and its intention to take positive action in promoting equality and justice.
- 2.4 We recognise the influence it has externally with many people and organisations with whom it interacts and it intends that this influence shall be used to promote equality and diversity.
- 2.5 We recognise the concept of institutional racism and is committed to the elimination of the root causes of it.
- 2.6 We will make sure that our employment practices are fair and promote equality; continue to take positive action to address any under representation in the staff, student and corporation profile and to tackle any performance gaps for equality groups.
- 2.7 We will work to remove barriers that might inhibit the success or progression of groups of staff or students and actively celebrate the rich diversity of our staff and students and the communities they belong to.
- 2.8 We will ensure that all College procedures treat individuals solely on the basis of their merit and abilities.

- 2.9 We will provide education and training to all staff and students in implementation of equality and diversity.
- 2.10 We recognise that passive support for equality and diversity is not sufficient as inequalities created by indirect discrimination, victimisation, harassment, segregation and stereotyping, affects everyone. Challenging inequality must be the responsibility of all members of the College community.
- 2.11 We will develop and embed equality objectives and embed impact assessment throughout the organisation.
- 2.12 We are committed to the elimination of unfair discrimination through the adoption of a zero tolerance principle and to the provision of equality for all, in education, training and employment.
- 2.13 The advancement of true equality of opportunity, embracing of diversity and the treatment of people with due regard and respect for difference requires monitoring, target setting and the development of programmes of positive action. Such programmes need to be regularly reviewed and revised when needed.
- 2.14 We will ensure that the principles of this policy are reflected in all our policies, practices, procedures and services and are part of everything that we do. This is an ongoing commitment to help ensure that our services meet the varied and individual needs of our staff and students as well as the wider community.

3. Aims of the Policy/Underpinning Principles

3.1 Strategic Goals and Values

Sunderland College's aspiration is "**Excellence at the heart of everything we do**". To realise our vision we will excel in our pursuit of excellence to enable us to grow our student population and the College's performance by uniting our people and culture and strengthening our reputation locally, regionally and nationally. Purposefully bold and challenging, we aspire to be:

- In the top 10 Colleges nationally for student achievement.
- In the top 30% Colleges nationally for financial health.

3.1.1 Values

We aspire to be the best in all that we do and to enable our employees and students to reach their full potential. We know that a culture of strong values means strong results for all of our stakeholders. This is why our professional values are fundamental to our pursuit for excellence and why they must underpin all of our activities.

Our Professional Values and Behaviours provide a valuable framework for use by people at every level of our organisation. They help us to evaluate our decisions and be confident in the choices we make.

Authentic: We are who we say we are, we do what we say we will do.

Respectful: We value the opinion of others and the contribution they make.

Innovative: We work hard to create a dynamic, forward-looking culture.

Ambitious: We are determined to achieve our vision and goals.

3.1.2 Strategic Goals

Goal 1: Shape and evolve a careers focused curriculum

Our focus is providing curriculum pathways that meet the current and future demands of the region's labour market.

Goal 2: Create outstanding learning opportunities for our students

An unwavering and relentless focus on developing our students through outstanding teaching, learning, support and assessment. .

Goal 3: Unite our culture and empower our people

We will build our culture and develop high performing people, empowered to lead, innovate and take ownership.

Goal 4: Strengthen our financial resilience and invest in our resources

We will build our financial resilience and strengthen our resources to ensure all stakeholders benefit from outstanding learning environments.

Goal 5: Engage locally, regionally and nationally and build our reputation

We will be an engaged and influential sector leader with a strong reputation and winning partnerships.

3.2 Equality Objectives

The vision, strategic goals and values are the overarching drivers for the following Equality Objectives 2018 - 2021:

3.2.1 Leadership and Management: To ensure that equality and diversity (including the equality duty) underpins the way the College is led and managed and is fully embedded in policy, performance and quality assurance processes. To lead the implementation of the Prevent Duty.

3.2.2 Performance and Progress: To address any gaps in pass, retention or achievement or progress of equality and disadvantaged groups. To ensure the curriculum offer is appropriately differentiated to meet student needs. To support the skills development, progress and progression of different groups.

3.2.3 Promotion and Celebration: To welcome and celebrate equality, diversity and community cohesion in the College and the wider community - including seeking opportunities for active promotion and marketing.

3.2.4 Representation and Participation: To develop the staff and governor profile of the College to better reflects the student population and take positive steps to address under-representation of equality groups in all areas of college. To encourage participation throughout the College ensuring effective mechanisms are in place for staff and student voice to be heard particularly those from equalities groups.

3.2.5 Teaching, Learning and Assessment: To ensure equality, diversity and inclusion are embedded in teaching, learning, training, student progress & development and assessment practices and within the curriculum offered by all programme areas. To develop students understanding of Social, Moral, Spiritual and Cultural (SMSC) aspects of learning and to embrace British and College values in our work.

3.2.6 Creating a Safe and Inclusive Community: To develop an inclusive and safe environment based on the equality and Prevent duties, where the needs of students and staff are appropriately identified and supported in order for them to thrive and reach their full potential.

3.2.7 Expectations of College Values: College will undertake to ensure all individuals and groups are treated fairly, courteously and with respect. Beliefs, values and religious views will be respected and tolerance encouraged where individuals or groups may have differences. The college will promote and raises awareness of respect for the rule of law, freedom of expressions, shared values, professional expectations and the code of conduct for the environment.

4. Responsibilities

Every member of staff has a responsibility for equality and diversity. Promoting equality and preventing discrimination or harassment is the responsibility of the whole College staff, including support staff. This EDI Policy outlines the roles and responsibilities of everyone involved and connected with the College, so that each individual knows what is expected of them.

The reporting and monitoring of equality and diversity occurs through team meetings, the department and College Self-Assessment processes, equality impact assessments and also through the Equality and Diversity Committee.

4.1 The Corporation will:

- make sure the College complies with all current equality legislation, including the equality duty and the Prevent Duty;
- monitor the implementation of the Policy and Action Plan to check progress and assess the impact on staff and students;
- receive and discuss regular equality reports on progress and performance;
- monitor achievement of equality objectives;

4.2 The Senior Management Team will:

- take appropriate action in any cases of bullying, harassment and discrimination in line with the
- College guidance;
- ensure the Policy is successfully promoted;
- allocate appropriate responsibilities, and provide suitable training and development for staff to
- implement this Policy;
- have a named member of the senior management team who will be identified as the co-ordinator for equality and will be involved in action planning, policy development and monitoring and evaluation.

4.3 The Vice Principal Student Services and Registry will:

- develop, monitor and ensure effective implementation of the Policy, equality objectives and Action Plan;
- provide effective leadership on equality, diversity, Prevent and community cohesion;
- provide regular reports for SMT and Corporation on the progress of the Policy, Equality Objectives and Action Plan;
- ensure staff, students and any other interested stakeholders are aware of this Policy and their roles and responsibilities in implementing it;
- make sure the Policy is readily available;
- service the College Equality & Diversity Committee
- produce an equality and diversity report on progress for corporation on an annual basis.

4.4 Staff and Students have the right to:

- be treated fairly irrespective of their ethnicity, sex, disability, age, religion and belief, sexual orientation, gender identity, socio-economic background or any other perceived differences;
- work and learn in an environment free from harassment, discrimination and bullying.

4.5 Staff and Students have the duty to:

- treat others with the respect they would wish to be treated with themselves;
- treat others kindly and fairly without prejudice, discrimination, bullying or harassment;
- not bully, intimidate, demean, undermine or harass others;
- report any incidents of discrimination, bullying or harassment using the appropriate systems.

4.6 All Staff have the duty to:

- be role models in how to behave;
- Familiarise themselves with this policy and know what their responsibilities are in ensuring that it is implemented
- promote respect, equality, inclusion, college values and good community relations;
- to make appropriate responses if witness to discriminatory behaviour – challenge inappropriate language and behaviour, tackle bias and stereotyping, respond appropriately to incidents of discrimination and harassment and
- report any incident using the appropriate systems;
- highlight any staff training or development that they require to carry out the above role and responsibilities.
- comply with guidance set out under this Policy and the Colleges Professional Guidelines.

4.7 Teaching Staff need to:

- promote an inclusive curriculum and whole College ethos which reflects our diverse society;
- promote awareness of British Values and Social, Moral, Spiritual and Cultural aspects of learning;
- ensure that lesson plans, lesson content and teaching and learning resources demonstrate sensitivity to issues and promote opportunities for equality and diversity;
- undertake training to support the embedding of equality, diversity and inclusion in teaching, learning and assessment; challenge inappropriate behaviour by students and work placement providers and follow the college reporting procedures.

4.8 Visitors and contractors are responsible for:

- knowing and following our Equality, Diversity and Inclusion Policy;
- complying with other college procedures e.g. external visitors and reporting any concerns or incidents.

5. Implementation

5.1 Meeting our Equality Duty

The legal responsibilities placed on the College by law are outlined in Section 5 which explains the duties we must comply with. This section of the Policy relates specifically to the requirements for achieving equality within the college and highlights what actions we intend to take to meet our legal duties and drive forward our work on equality, diversity and inclusion.

What we will do:

5.1.1 Implement the Public Sector Equality Duty and ensure that the College complies with the requirements of the Equality Act 2010 through the implementation of this Policy which encompasses our Single Equality Scheme;

5.1.2 The College will not tolerate discrimination on the grounds of race, disability, sex, age, religion or belief, sexual orientation, pregnancy and maternity, marriage and civil partnership, gender identity or reassignment and socio-economic status. Any incident or complaints of discrimination, bullying, harassment or victimisation will be investigated, and if proven, disciplinary action will be taken;

5.1.3 Identify and challenge stereotypical and discriminatory assumptions and act on attitudes, remarks and behaviour based on prejudice or discrimination;

5.1.4 The College will report annually on its progress against Equality Objectives and publish an annual equality and diversity report to Corporation.

5.1.5 The College's commitment to Equality and Diversity will be highlighted in publicity material and a summary of the results of monitoring information will be published annually. Our commitment to equality, diversity and inclusion will be highlighted in the College Prospectus and other key publications such as the Self-Assessment report.

5.1.6 All staff, students and stakeholders will have access to the policy either paper based or electronic. The policy will be published on the college website and the intranet for staff.

5.1.7 Work to address any equality gaps in for different groups of students and put in place actions to advance EDI further.

5.1.8 Collect and report on information in relation to the diversity of our staff, students, and corporation members together with local community data to assess needs and inform service delivery.

5.1.9 impact Assess and review policies and procedures, to ensure that the needs and interests of all equality groups are taken into consideration when planning and delivering services.

5.1.10 Ensure that recruitment, selection and promotion opportunities are open to all students and staff from different groups and backgrounds for all courses of study and employment opportunities, using positive action where required for employment.

5.1.11 Promote and embed an inclusive curriculum and student progress and development programme which upholds the principles of equality and diversity, respect, tolerance and British Values as well as the Social, Moral, Spiritual and Cultural (SMSC) aspects of learning.

5.1.12 Encourage the participation of different groups and consult with staff, students and service users in the delivery and shaping of services in the College. The College will utilise key group for consultation such as the LGBT+ Group and the Student Councils.

5.1.13 All staff will be given ongoing support and training to ensure that an inclusive and non-discriminatory culture exists and equality and diversity is embedded throughout the College.

5.1.14 The staff induction programme will highlight the College's commitment to equality and diversity, action to be taken by staff who are subject to discrimination and the action to be taken against any alleged perpetrators of such discrimination.

5.1.15 Take steps to take account of people with disabilities and vulnerabilities, even where this involves treating people with a disability or vulnerability more favourably than other people.

5.1.16 The College will make reasonable adjustments to support people with disabilities to help overcome barriers. Further details and information is included within the Learning Support Policy.

5.1.17 Students and Staff wishing to participate in cultural/ religious activities will not be discouraged and the College will provide a supportive environment for staff or students who wish to follow cultural, philosophical and religious practices and express their cultural and / or religious identity. The exception to this is where the health, safety and welfare of the person is compromised or where there is likely to increase the risk to other people.

5.1.18 Identify opportunities to encourage students to engage with other students from a different background. The College will be involved in multi-agency partnerships working on promoting equality, inclusion and cohesion across the City.

5.1.19 The College has various facilities and support available for students and staff including multifaith prayer rooms, health and wellbeing room, staff rooms, an LGBT+ group, occupational health, a college counsellor, accessible and gender neutral toilets and accessible buildings, services and environments.

5.1.20 The College's Student and Customer Experience teams aim to support students to access college life and remove identified barriers to learning that arise from vulnerabilities, disabilities or learning difficulties (including mental health). This will include support from a highly trained staff team, access to

additional resources and assistive technology support to meet the needs on identified assessments, for example those with Education Health Care Plans.

5.1.21 Provide key College documents in alternative formats on request, for example Braille or large print.

5.2 Legislative Overview

5.2.1 Public Sector Equality Duty

Sunderland College is defined as a public authority under the Equality Act 2010. This means that we have a legal duty to comply with equality and diversity laws. The Equality Act 2010 is the most relevant equality legislation applicable to public bodies. The Act replaced all previous equality and anti-discrimination legislation with a single act. The Equality Act 2010 is realised through a single public sector equality duty (known as the Public Sector Equality Duty, PSED or the Equality Duty).

The equality duty extends to all aspects of a person's identity – known as 'protected characteristics' – that are protected under the Equality Act 2010. These are race, disability, sex, age, religion or belief, sexual orientation, pregnancy and maternity, marriage and civil partnership and gender identity. The duty is in place to protect and promote equality for the protected characteristics and they apply to all staff, students and visitors to the College.

The equality duty has two main parts: the 'general' equality duty and 'specific duties'. The general equality duty sets out the equality items that the College need to consider when making decisions that affect students or staff with different protected characteristics. This duty has three elements which the College are required to have 'due regard' when making decisions and developing policies:

- Eliminate discrimination, harassment, victimisation and other conduct that is prohibited by the Equality Act 2010;
- Advance equality of opportunity between people who share a protected characteristic and people who do not share it; and
- Foster good relations across all protected characteristics.

Having due regard to the need to advance equality of opportunity is defined as having due regard to the need to:

- a. Remove or minimise disadvantages;
- b. Take steps to meet different needs;
- c. Encourage participation when it is disproportionately low.

In order to help the College meet the general equality duty, there are two specific duties that need to be carried out. These are:

- To **publish information** to demonstrate how the College is complying with the equality duty, at least annually.
- To **prepare and publish one or more specific and measurable equality objectives**, at least every four years to achieve any of the aims in the general equality duty.

This applies to all activities in education, employment and training such as teaching and learning, employing people and providing services. The responsibility of meeting the legislative requirements

sits ultimately with the College Corporation. However all students, staff and visitors have responsibilities to ensure the duty is met to ensure legal compliance.

The College recognises the importance in relation to meeting the legal requirements and through this Scheme outline our objectives, priorities and actions to eliminate discrimination, harassment and victimisation, advance equality of opportunity and foster good relations between different groups of people.

5.2.2 Protected Characteristics

These nine aspects of our personal identify are protected under the Equality Act 2010.

- **Age:** A person belonging to a particular age or age range.
- **Disability:** A physical or mental impairment which has a substantial and long-term adverse impact a person's ability to carry out normal day-to-day activities.
- **Gender reassignment:** A process of transitioning from one gender to another.
- **Marriage and Civil Partnership:** Union between man and woman or same sex couples.
- **Pregnancy and Maternity:** Being pregnant and up to 26 weeks after giving birth.
- **Race:** A group of people defined by their race, colour, nationality, citizenship, ethnic or national origins.
- **Religion or Belief:** Identified beliefs that affect your life choices or the way you live. Also includes lack of belief.
- **Sex:** Man or woman, boy or girl, group of people of same sex.
- **Sexual Orientation:** Whether a person is attracted to their own sex or the opposite sex or both sexes.

5.2.3 Prohibited Conduct

The Equality Act 2010 extends the scope of what conduct is prohibited in relation to the protected characteristics. The following provides an overview of what is included within the scope of the legislation

Direct Discrimination: Direct discrimination occurs when someone is treated less favourably than another person because of a protected characteristic they have or are thought to have, or because they associate with someone who has a protected characteristic.

Associative Discrimination: This is direct discrimination against someone because they associate with another person who possesses a protected characteristic. Associative discrimination already applies to race, religion or belief and sexual orientation. It is now extended to cover age, disability, gender reassignment and sex.

Perceptive Discrimination: This is direct discrimination against an individual because others think they possess a particular protected characteristic. It applies even if the person does not actually possess that characteristic. It already applies to age, race, religion or belief and sexual orientation and is now extended to cover disability, gender reassignment and sex.

Combined Discrimination: Combined or dual discrimination is where a person is discriminated against by another because of a combination of two relevant protected characteristics (e.g. if someone is treated unfairly because they are female and disabled).

Discrimination arising from disability: This is where a person discriminates against a disabled person and they are treated unfavourably because of something arising in consequence of the disability and it cannot be shown to be proportionate to achieving a legitimate aim.

Indirect Discrimination

Indirect discrimination can occur when you have a condition, rule, policy or even a practice that applies to everyone but particularly disadvantages people who share a protected characteristic. Indirect discrimination already applies to age, race, religion or belief, sex, sexual orientation and marriage and civil partnership and is now extended to cover disability and gender reassignment.

Indirect discrimination can be justified if you can show that you acted reasonably in managing your business, i.e. that it is 'a proportionate means of achieving a legitimate aim'. A legitimate aim might be any lawful decision you make in running the organisation, but if there is a discriminatory effect, the sole aim of reducing costs is likely to be unlawful. Being proportionate really means being fair and reasonable, including showing that you've looked at 'less discriminatory' alternatives to any decision you make.

Harassment

Harassment is "unwanted conduct related to a relevant protected characteristic, which has the purpose or effect of violating an individual's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for that individual". Protection includes harassment because of perception and association. Harassment applies to all protected characteristics except for pregnancy and maternity and marriage and civil partnership. Employees will now be able to complain of behaviour that they find offensive even if it is not directed at them, and the complainant need not possess the relevant characteristic themselves.

- **Third Party Harassment:** The Equality Act makes an organisation potentially liable for harassment of their employees by people (third parties) who are not employees of the company, such as customers or clients. The organisation will only be liable when harassment has occurred on at least two previous occasions, and they are aware that it has taken place, and have not taken reasonable steps to prevent it from happening again. This already applies to sex and is now extended to cover age, disability, sex, reassignment, race, religion or belief and sexual orientation.

Victimisation

Victimisation occurs when a person is treated badly because they have made or supported a complaint or raised a grievance under the Equality Act; or because they are suspected of doing so. A person is not protected from victimisation if they have maliciously made or supported an untrue complaint. There is no longer a need to compare treatment of a complainant with that of a person who has not made or supported a complaint under the Act.

Positive Action

The Equality Act allows an organisation to take positive action if they think that employees or job applicants who share a particular protected characteristic suffer a disadvantage connected to that characteristic, or if their participation in an activity is disproportionately low.

Genuine Occupational Requirement

In certain circumstances it is legal to recruit someone purely on the basis of their characteristic. This is where it is legal to recruit someone purely on the basis of age, race, gender, sexual orientation, and religion or belief, where this is a genuine occupational requirement for the job.

5.3 Key Terms

5.3.1 Disadvantage – something that the individual affected might reasonably consider changes their position for the worse.

5.3.2 Diversity – where many different types of people are included.

5.3.3 Equality Impact Assessment – refers to a detailed and systematic analysis of the actual or potential effects of a formal or informal policy, proposed policy, practice, criterion or service to determine whether it has a differential impact upon identifiable groups of people.

5.3.4 Family Status – identifies whether an individual has children or does not have children.

5.3.5 Gender – identifies an individual’s sexual group; i.e., whether the individual is male or female.

5.3.6 Marital Status – identifies whether an individual is married or single.

5.3.7 Nationality – refers to the country in which an individual was born.

5.3.8 Stakeholders – people who have an interest in a subject, issue or organisation.

5.3.9 Trade Union Membership – identifies whether the individual is, or is not, a member of a trade union.

5.3.10 Transgender – refers to a person with gender dysphoria (a gender identity that is different from their anatomical sex) who feels a consistent and overwhelming desire to live their life in the gender that is opposite to that assigned to them at birth.

5.3.11 Zero Tolerance – refers to a principle whereby behaviour, attitudes and language which may be deemed to be offensive, derogatory or discriminatory is not overlooked but challenged – with the aim of effecting change or redress.

6. Associated Documents

This policy should also be read in conjunction with other related policies such as the Safeguarding and Child Protection Policy, College Professional Guidelines, Learning Support Policy, Code of Conduct, Dignity at Work and Disciplinary Policies for staff and students

7. Policy Monitoring and Review

The Policy identifies seven Equality Objectives that are incorporated into an Action Plan which sets out how the College intend to implement the policy over the next three years. Progress will be reviewed annually by the Equality Diversity and Inclusion Committee and reported to the Senior Leadership Team and Board of Corporation.

8. Equality Impact Assessment

- Impact Assessment will be embedded into college processes and procedures to ensure equality issues are addressed at all levels and in all areas in the organisation.
- Impact assessment is an anticipatory process that allows the college to predict possible barriers faced by identifiable groups of people.
- A judgement of adverse impact will be made if the impact of a policy disadvantages one or more identifiable groups.
- Steps will then have to be taken to mitigate this adverse or negative impact.
- All impact assessments carried out may include consultation and involvement of people from different ethnic backgrounds, disabilities and with other minority groups as appropriate.

Have you sought consultation on this policy?		One of the purposes of the policy is to ensure consistent and fair treatment for all and the consultation group, which included the E&D Committee, Student Services and Learning Support Managers, has impact assessed in relation to individual needs and characteristics. The College will ensure consideration is given to any mitigating circumstances and will make any reasonable adjustments as appropriate in line with Sunderland College’s Equality Duty commitment.		
Details:				
Could a particular group be affected (negatively or positively)?	Impact Y/N	Description of Impact	Evidence	Mitigation/Justification
Protected characteristics under the Equality Act 2010				

Age	N			
Disability	N			
Gender Reassignment	N			
Marriage and Civil Partnership	N			
Pregnancy and maternity	N			
Race	N			
Religion or belief	N			
Sex	N			
Sexual Orientation	N			
Additional characteristics to consider				
Young Persons in Care & Care Leavers	N			
Young Carers & Care Givers	N			
Young Parents	N			
Youth Offenders	N			
Those Receiving Free School Meals	N			
If there is no impact, please explain:				