

PROPOSAL TO RELOCATE CEDARBANK SCHOOL, LIVINGSTON

A REPORT OF THE STATUTORY CONSULTATION

Monday 8 September to Wednesday 30 October 2019

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1. INTRODUCTION

1.1 PURPOSE OF THE REPORT

The purpose of this report is to give information on:

- West Lothian Council's proposal to relocate Cedarbank School, Livingston as part of the Council's continuing commitment to ensure equitable, quality and sustainable provision for pupils with additional support needs.
- the Consultation Process
- Consultee Responses
- Notes of Public Meeting

1.2 SUMMARY OF PROPOSAL

West Lothian Council, Education Services proposes to relocate Cedarbank School, Livingston.

It is proposed that S1-S6 education for pupils with a range of additional support needs related to learning difficulties and social communication needs will be delivered by means of a separate all-purpose provision within the estate of The James Young High School in Livingston.

Both Cedarbank School and The James Young High School will maintain their identity and operate as defined individual schools.

1.3 BACKGROUND

West Lothian Council undertook public consultation regarding Additional Support Needs provision during 2013 to 2015. Extensive consultation with stakeholders took place and contributions provided valuable feedback on the requirements for future provision.

It was acknowledged at that time, the Council's commitment to undertake the necessary consultation process on the delivery of secondary education for pupils with a range of additional support needs related to learning difficulties and social communication needs.

Subsequent investigations were initiated by West Lothian Council Education Services into reviewing the condition, suitability and capacities at existing ASN schools, establishing feasible modification and relocation options.

The outcome of these investigations was the recognition that there was a need to consider options for relocation of Cedarbank School related to (i) existing property asset performance and (ii) the

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delivery of a single S1-S6 education establishment for the children and young people attending Cedarbank School.

1.4 TIMELINE

The following timeline was established and incorporates the organisation of a public meeting, Education Scotland involvement, the preparation and publication of the report on the outcomes of the consultation and subsequent submission to West Lothian Council Education Executive for its decision in January 2020.

Date	Event	Description
January 2019	Education Executive Meeting	Meeting to discuss proposal and agree continuation to Pre Consultation phase
January/February 2019	Pre Consultation	Gather and share information in advance of Statutory Consultation
23 April 2019	Education Executive Meeting	Meeting to review proposal and Consultations Document and agree commencement of Statutory Consultation phase.
9 September 2019	Start of Statutory Consultation	Beginning of formal public consultation (min 6 continuous weeks consultation period including min of 30 school days)
September 2019	Public Meetings	Public Meetings to discuss proposal
30 October 2019	End of Consultation	End of Public Consultation
November 2019	Submit report to Education Scotland	West Lothian Council Education Services relays report on proposal and consultation findings to Education Scotland
Mid December 2019	Offer Education Scotland at least 5 days' notice prior to publishing Final Consultation Report	Upon receipt of response from Education Scotland and on consideration of previous consultation period representations, Authority will prepare and publish Final Consultation Report
20 December 2019	Publication of Final Consultation Report	A minimum of three weeks after publication of Final Consultation Report Authority

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		will make final decision
21 January 2020	Education Executive Meeting	Decision made

1.5 CONSULTEES

In terms of the Schools (Consultation) (Scotland) Act 2010, any proposal to make amendments to the school estate in this case, relocation of a school, requires a formal consultation.

The Schools (Consultation) (Scotland) Act 2010, as amended by the Children and Young People (Scotland) Act 2014, sets out the statutory consultation requirements.

The statutory consultees for a proposal to relocate an education establishment are prescribed as follows:

- the Parent Council or Combined Parent Council of any affected school¹
- the parents of the pupils at any affected school
- the parents of any children expected by the education authority to attend any affected school within two years of the date of publication of the proposal paper
- the pupils at any affected school (in so far as the education authority considers them to be of a suitable age and maturity)
- the staff (teaching and other) at any affected school
- any trade union which appears to the education authority to be representative of the persons mentioned in bullet point above
- the community council (if any)
- the Community Planning Partnership (within the meaning of section 4(5) of the Community Empowerment (Scotland) Act 2015 for the area of the local authority in which affected school is situated.
- any other community planning partnerships considered relevant by the Authority.
- any other education authority that the education authority considers relevant
- any other users of any affected school that the education authority considers relevant
- in relation to any relevant proposal which affects a denominational school, the Church,

¹ *any affected school - all schools within West Lothian are viewed as potential associated schools to any of the ASN establishments within the Authority therefore all nursery, primary and secondary schools distributed notification of the Education Service proposal – see **Appendix A – Letter to Consultees** - this letter being distributed via hard copy letter and/or school management software package Groupcall Messenger*

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Denominational Body or Scottish Hierarchy of the Roman Catholic Church

1.6 CONSULTATION PROCESS

The consultation period incorporated a period of 30 school days (excluding any school holiday) from Monday 9 September 2019 until Wednesday 30 October 2019. This timescale adheres to the statutory consultation period for such circumstances which is a minimum of 6 consecutive weeks and include at least 30 school days.

To communicate, the Education Service proposal information was delivered through the undernoted media avenues:

- West Lothian Council Website <https://www.westlothian.gov.uk/cedarbank-relocation-consultation>
- West Lothian Council digital media products
- Local Press
- Available in hard copy via central locations within West Lothian
- Hard copy available for postal distribution on request

In order to ensure all parties had the same opportunity to access the consultation information, facilities were put in place to communicate the proposal in a manner best suited to the needs of the individual. To this regard, the Consultation Document was made available through the following means as and when requested:

- Translation Services
- Provision for deaf and hearing impaired, blind and visually impaired

A copy of the Consultation Document is attached as Appendix B.

Public meetings were conducted at Cedarbank School, Livingston, on Wednesday 18 September 2019 and at The James Young High School on Thursday 26 September 2019. Council officers outlined the key elements of the proposed relocation of Cedarbank School and answered question from meeting attendees. Comprehensive minutes of the public meetings are detailed in Section 3 of this report.

During the consultation period views on the proposal were welcomed in writing to the address given below:

Melanie Laurie, Education Services, Civic Centre, Howden Road South, EH54 6FF

Responses by e-mail were directed to Education.Consultation@westlothian.gov.uk

All interested parties were invited to submit their comments by close of business Wednesday 30 October 2019.

2. CONSULTEE RESPONSES TO PROPOSAL

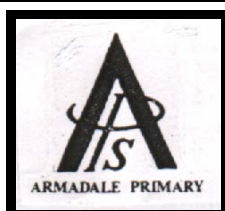
West Lothian Council Education Services noted comments made through a variety of means however only those official representations submitted in the terms of the **Consultation Document SECTION 5: Consultation Process and How To Have Your Say (Appendix B)** have been recorded for reporting purposes.

No hard copy written representations were received during the consultation period. All responses from consultees were received either in electronic format (email) or by oral representation at the statutory public meetings.

2.1 RESPONSES RECEIVED

2.1.1 School Pupil Council Responses (email):

(i) Armadale Primary School Pupil Council:



Armadale Primary School
High Academy Street
Armadale
West Lothian
EH48 3JD
01501 730282

Minutes Pupil Council
Friday 13th September 11:30am
Consultation – Location of Cedarbank School, Livingston

Acting DHT – Meeting opened and reason for meeting explained

2:1 The Proposal

All children happy that the school will be linked to The James Young High School and that they will have a separate entrance to maintain their identity.

■ – expressed a view that the pupils will feel a sense of belonging but have their own space.

2:2 Background

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No comments

2:3 Site Location

All happy with the location and the accommodation provided

- – asked about a gym hall
- – explained that the GP and multi-purpose hall could be used for gym

2:4 Admission Criteria

No comments

2:5 School Catchment Area

No comments

2:6 Non-Denominational Education Provisions

All happy the school would be open to every denomination

2:7 Pre-consultation exercise

No comments

2:8 The James Young High School

No comments

All areas of the Educational Benefit Statement read to the children and all were happy with the provision that is being made for the pupils of Cedarbank.

All of the members of Armadale Primary Pupil Council are happy with the proposal and think it is a good idea for them to move to The James Young High School.

Meeting closed at 12:10

(ii) Livingston Village Primary School Pupil Council:

 <u>Pupil Council</u> Agenda/minutes of meeting held on 01/10/19		
Agenda	Ideas/Decision	Action
Consultation regarding relocation of Cedarbank School	• ■ explained why WL Council are proposing to relocate Cedarbank School and the discussion raised the following points:- - It would be good to have all the children together because it must be difficult to have a school identity if	• ■ will provide this feedback to ■ and forward our thoughts on to

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	they are at different campuses. - It's not fair they're in different places, they might get scared and it might be harder for them to learn. - If they were all together they would have more friends. - They would need their own separate area within the school, including a space for a safe playground. - The older kids might make fun of them. - Perhaps they could have a buddy system if it was relocated to James Young and children from JYHS could offer to support the children from Cedarbank. We discussed all the different people who have been consulted as part of this relocation process. Some of our class reps were wondering if the children who attend Cedarbank have been consulted?	Melanie Laurie at the Council.
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(iii) The James Young High School Pupils' Perspective Meeting:



CEDARBANK PUPIL CONSULTATION
MEETING WITH THE PUPILS' PERSPECTIVE 10 SEPTEMBER 2019
 Below is a summary of the key points raised by our 60+ strong Pupils' Perspective group:

Potential Benefits

- Would there be potential for us to share facilities that would benefit both groups of pupils?
- Pupils in senior school could benefit from carrying out their work placements in a school – in particular pupils who wish to go into teaching or any caring role
- Could our Sports Leader class work closely with this local school to organise sporting events – reducing the transport costs
- Would there be the opportunity for JYHS to have a 'mini makeover' or some upgrades as a result of the work on site
- Some pupils said they felt we had a moral obligation to allow the school to be built

Queries

- Pupils were concerned about both sets of teachers/parents using the same access road. However this has now been addressed post our Pupils' Perspective meeting; a new access road is proposed for Cedarbank School.
- Pupils were concerned the new building may remove some of our sports facilities; again we were able to reassure the group that this would not be the case due to the position of the proposed school
- Pupils also raised the issue of noise as a result of building work and how it might impact on their learning and local residents.

2.1.2 Community Council Responses (email):

(i) Livingston Village Community Council:

<i>Livingston Village Community Council</i>	
<i>Chair:</i> [REDACTED]	<i>Planning Secretary:</i> [REDACTED]
West Lothian Council Education Services Civic Centre Livingston EH54 6FF 17th October 2019 For the attention of Melanie Laurie	
c/o [REDACTED]	
<u>Consultation on Relocation of Cedarbank School</u>	
Further to your message dated 9 th September 2019 I submit this letter on behalf of Livingston Village Community Council with the following comments on the above proposal. We will follow the document format section by section as given.	
Section 1 Purpose of Document. No comments to add, we support this section Section 2 The Proposal. For paragraphs 2.2 Background, 2.4 Admission Criteria, 2.5 Catchment Area, 2.6 Non-denominational provisions, 2.7 Pre-consultation – We have no comments to add and support the content of these paragraphs. Para 2.1 Relocation. We consider it important that Cedarbank School will remain a defined, distinct school separately entranced and operated from The James Young High School. We think it makes good sense to amalgamate the 3 current teaching locations into a single school. Para 2.3 Site Location. No comment to add to the selection process. It would have been informative and valuable to readers if a site plan had been included as an appendix. Even in draft provisional form to indicate the Cedarbank footprint on the JYHS estate. Provision date of August 2022 is noted. We trust that all process between concept and completion run smoothly in a timeous fashion to ensure this date without the usual project slippages that seem all too common these days. We would like to see no need for decanting the JYHS pupils. With effective design and efficient project management this can be achieved. We all accept that parts of the JYHS estate will become a building site and that safe segregation of building works and vehicle movements must be of paramount importance to the project manager on site. 2.8 re JYHS. We wholeheartedly support the theme here that the addition of Cedarbank School will not have any impact on the pupils, parent, carers and staff nor on the management of the high school.	
Section 3 Education Benefit Statement. For paragraphs 3.3 Transport, 3.5 School Management, 3.7 Accommodation, 3.8 Outdoor learning, 3.10 Community links, 3.12 Benefits for school users - We have no comments to add and support the content of these paragraphs. 3.1 Curriculum. We trust all good aspects of teaching etc in the old locations can be embodied in the new building. The aims and objectives in this paragraph sound excellent – let's hope they will be so in reality. 3.2 Transition. For the Cedarbank pupils this could be a traumatic time. You have recognised the possible anxieties so support needs can be planned and implemented. 3.4 Mainstream links. To some extent these must already exist at Deans Community High School and Armadale Academy. Thus lessons learnt there can be of value to the new location.	

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3.6 Staff Teams. One assumes staff at the existing Cedarbank school will transfer in toto. Will the transfer of staff from Deans and Armadale leave gaps in the staff complement or skills?

3.9 Recreational areas. We note the sharing proposal with JYHS – does this not jarr with the principles outlines in paragraph 2.8. If adopted then any sharing will require careful supervision

3.11 Mentoring and Bullying. The risk of bullying must be a grave concern. Within the premises staff can apply some degree of control but outside it needs some more thinking. Is it worth considering a stagger to starting and finishing time to reduce exposure?

Section 4 Integrated impact Assessment. No comments to add, we support this section

Section 5 Consultation Process No comments to add, we support this section. Just a reminder of one of the statements that we at Livingston Village Community Council expect to receive a copy of the Final Consultation Report

We hope our remarks are constructive to your final review of the Proposal to Relocate.

Yours Faithfully



Chair

Livingston Village Community Council

2.1.3 Email Responses

There were 12 individual electronic responses received.

As part of the consultation process and in order to ensure a rigorous and thorough examination of the responses received, Council officers read every response. Officers ensured that the views and opinions of respondents were given due consideration and that acknowledgments were offered to each of the consultee submissions received.

For the purpose of this report respondent comments are anonymised where appropriate.

Respondent Group	Comment
Staff Member	Having read through your proposals I have some concerns about the access road and parking for the new school. At present there is a backlog of parents trying to drop off pupils in the carpark at the beginning and end of the day which will only be exacerbated with the new provision being in place. Currently there is no turning circle outside the school grounds so parents enter the school though the bottleneck at the school gate. I would propose that an additional access road with turning circle would be required. This is in place at both Deans Community High School and Inveralmond . Both are outwith the school grounds and discourage pupils from being dropped off in the carpark. This is particularly a problem during Ice and Snow where the incline on the hill means cars get easily stuck. Maybe this needs to be addressed at planning. There is also the issue of staff parking if the new school is to just use the existing facilities. This would mean that there are a considerable number of extra staff requiring additional parking. I do hope this has been factored into the scheme.

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Staff Member	Positives: • Specific access road for the new school is a positive addition • Outside spaces well considered in light of National guidance and the current use of outside space by the school • Consideration seems to have been given to maximum light into the school. • There has been consideration been given ensuring that practical classes are bigger – this is very welcome. However please reconsider: • Ensure that all office spaces have windows with natural light and a view outside. • The PE hall also to be used as a dining facility will mean PE timetabling will be reduced. • The toilet facilities need to ensure privacy for ASN young people. • The kitchen seems to be large considering it is for distribution of food at lunchtime only. • The kitchen located beside the PE hall, with indication that 2 classrooms will also be used for dining, would mean that ASN young people would be carrying food along a corridor. • There has been consideration been given to practical classes, but locating a Quiet room near them seems to defeat purpose of a “Quiet” room • The plans do not seem to show where staff car parking is?
Transportation Company	We have been notified that there is a proposal to relocate Cedarbank School services and that any comments or opinions should be sent to this address. We are a coach company who transport pupil from home to Cedarbank School and our opinion is that Cedarbank has outgrown the location that it is in. Our vehicles find it very difficult to get parked when dropping off and collecting kids therefore in terms of logistics and safety we agree that a relocation of Cedarbank School services is required.
Not Disclosed	The only points I would like to express interest in is regarding Traffic Management and suitable Public Transport. If both schools are to use Quentin Rise as the entry and exit point, the current set up is not ideal. The road would have to be widened to allow cars to freely pass up and down and where there is currently a traffic calming measure, a zebra crossing perhaps could be installed to allow pupils from The James Young High school to access the walking paths towards Dedridge West and Adambrae and make the James Young carpark a one way system. At the moment the weather is calm, but come winter, I expect the traffic to increase tenfold. The local bus service to James Young, although frequent is not the best as there is only one bus, the number 27, passing by and it only goes to the centre and to Craigshill. I would like to see other buses put on that go from Murieston through Dedridge, as there are another 200 plus homes being built on the site of the Wellhead farm and a second bus from Deans North, through Howden and then on to Dedridge passing and stopping at the school even if only at school start and end times as there are pupils from these areas that get driven or will be driven to school due to the lack of suitable public transport. That would further free the area of cars, as most of the Cedarbank pupils

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	probably rely on Taxis and Taxi buses to get to school and they will need to be able to get children to school on time and be able to park up safely
Parent	I have read the consultation paper on relocation of Cedarbank School. My children (currently primary school age) are within the catchment area of James Young High School. I can't tell from the paper *how* the relocated school is to be accommodated at James Young. As a consequence I don't feel I can form a proper view on relocation. If the relocated school were to result in a reduction of e.g. playground facilities for pupils at James Young, then I would have concerns. However as the document is cast it is impossible to know whether that is the case. I therefore have to express my concern about the relocation proposal, pending clarification.
Parent	Having read the West Lothian Council Education Services Consultation document issued September 2019 and attended last night's public consultation meeting I have the following questions: Section 2.3 - Site Location (page 5): <i>"Should the proposal be agreed and progressed and on completion of proposed works, the newly constructed Cedarbank School will deliver 11 class bases with an additional 3 practical class areas, 1 general purpose space and a multi-purpose hall."</i> - What is the current number of class bases and practical areas in use for all of S1 - S6 pupils? <i>"Intended delivery of proposed facilities and relocation of Cedarbank School is August 2022."</i> - What is the Council's projected requirement of ASN pupils by 2022 and their projected increase with additional building of new homes in West Lothian? (should have a good idea as several of these pupils will already be in Primary school). Section 3.9 - Recreational Area (page 11): <i>"Cedarbank pupils will also have the opportunity to make use of The James Young High School external facilities and social areas as and when appropriate in relation to their individual needs."</i> - Please define - does this mean ONLY when James Young pupils do not need use of these spaces? Will Cedarbank have a separate playground and suitably segregated open space - I was concerned last night that the current proposal is for a "soft" boundary between the Cedarbank playground. Finally - how do you propose to develop this school on a budget (6.6 million was mentioned last night) which is apparently lower than a mainstream school of similar size - looking at recent issues in Edinburgh schools and new Sick Kids hospital we hope the Council is not going to adopt a "light touch" approach to achieve this.
Parent	Being part of the original group seeking a new school I was surprised last night to hear that the new school for Cedarbank will not have a physical link to the mainstream high school but instead will have an external walk to shared central

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	facilities i.e. PE, swimming pool. During discussions last night I was not clear if the plan is for Cedarbank pupils to also share the dining area. I know that my son and many of his year group very much enjoy being part of the main dining experience and the use of the keycard paying facility - it allows them to start to budget and prepare for adult life... I do hope this is still the plans for the new school as preparing for independence and life skills are an important part of Cedarbank pupils learning. I do appreciate that logistics with parking and access may well be the reason for the lack of an internal link to shared facilities but please don't lose the option for shared/assisted secondary level dining
Not Disclosed	One of the concerns I have is that if our pupils need to share facilities within James Young High School, when the weather is icy/inclement our pupils with health or mobility issues will be soaked or find it difficult to walk to the JYHS building. I also feel the entrance to the school is on a bend and this may not be safe for vehicles accessing the site.
Parent	I attended the meeting at Cedarbank school on 18th September 2019, as a parent of a child in S1 at Cedarbank school. The first thing I would like to say is that I have nothing but praise for my experience of the school this far. The transition and first term have been very positive. I am in complete support of the need for a new school for S1-S6 and I think it will be beneficial for all six years to be in the same building, and it is a great opportunity to be in a purpose built school. It will also reduce the distress of multiple transitions. My one significant fear from the consultation meeting is that it will be too small – have too few classrooms within a very short period of time. I cannot see how the projected school would manage to teach six year groups each as big as the current S1 intake. I work as a GP, and I see the impact of children with additional needs being inappropriately placed in mainstream; I see parents fighting for alternative provisions, and the stress this causes, often with little success; I see many children (with autism and coexistent anxiety usually) school refusing as they have not been allocated to a school that can meet their needs; I see larger numbers of parents being forced to homeschool as they have not been offered an appropriate alternative. I know that Cedarbank is not the only school for children with additional support needs that is being expanded. I am aware of the changes to Ogilvie campus and the expansion of Autism resource bases within secondary schools. However, the prevalence of additional support needs has been rising rapidly over the last few years, and I think it is vital that Cedarbank is built large enough to be able to accommodate six year groups as large as the current S1. I do not believe that it would be able to do so. It was unfortunate that at the meeting we could not ask the headteacher what her thoughts were on the number of classrooms. I hope that the teaching staff are consulted and listened to, as they will have expertise in this matter. I hope that you can see that my concerns are not purely for my child, but for the provision of children with additional support needs in West Lothian in the future. I would be happy to correspond further on this matter in the future if it would be

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	helpful
Staff Member	I support the pupils during break and lunchtimes where there has always been difficulties in the school because of lack of canteen space for meals. The proposal for the new school shows that there will be no canteen facilities at all and that the pupils are expected to eat in the PE hall. This will cause many difficulties both for the educational use of the hall as the hall will need to be set up every day for lunches and then cleared away taking away the use of the hall and it is not giving the pupils the proper canteen facilities they deserve as all other secondary schools have. Instead of improving the facilities we now have it is actually taking a step back and will not assist in the wellbeing of our pupils. This is an issue many staff are worried about and I hope that it is considered seriously.
Parent	We are pleased to see that West Lothian Council are providing more sustainable and suitable provision for Cedarbank. The current model – one secondary school across three sites- is unsustainable and disruptive for the children who attend Cedarbank. We are content with the proposed location of the new school. However, we continue to have reservations about the new provision. These are as follows 1. Budget. We have always clearly stated that the budget of £6 million was insufficient for a building the size and quality that would bring Cedarbank pupils on a parity with their mainstream peers. At the consultation meeting, Mr Cameron announced that the budget had been increased to nearer £7 million. However, he said that increase was due to creating new access to the new location on the James Young site. We had hoped that the increase in budget was to make the school larger and improve the quality. 2. Pupil roll. It has been consistently and clearly stated by parents at the preconsultation and consultant meeting that building a school for 130 pupils was not sufficient for future needs in West Lothian. It was assured by the Education Authority that this met future needs however this has now been reduced to 110 pupils. Please can you let us know currently how many children apply for provision at Cedarbank and how many do not get awarded a place? Isobel Muir school was built deliberately with spare capacity. However, it was at full capacity within 3 years. 3. Size of building. While we are pleased that the new building will be larger than the current provision (as the current classrooms are tiny by anyone's description) we would argue that it is not large enough. It is currently 1,100 m² and the new proposal is 1,750m². Many of the children experience physical impairments, social communication issues and ASD. Often they need quiet / safe spaces with which to regulate themselves. This brings the space requirements far and above a mainstream provision. We feel this lack of space will undermine the tenets stated below: <i>"Delivery of secondary education at Cedarbank School will enhance access for pupils (both current and future) to a balanced curriculum that provides the best possible learning opportunities and experiences and will enable pupils to enjoy their education within a supportive specialist setting and develop positive attitudes"</i>

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	<i>towards learning</i> We feel WLC do not appreciate that this is an amazing opportunity to 'get things right'. Although we do appreciate it reflects pressure on their budget. 4. The question was asked at the Cedarbank consultation meeting whether it would be a single or double storey provision. This was not answered by the council. However, they communicated that it would be double storey at the James Young Consultation a week later. Why weren't the Council forthcoming with this fact a week earlier? 5. <i>Curriculum for Excellence</i> As the plans currently stand, we feel that the 7 Principles of Curriculum Design will not be met. For them to be so, the school, as on a par with their mainstream secondary schools, should have a dedicated Home Economics, Art, CDT and Science Lab. Our understanding from the discussions with the Council is that the 4 general purpose rooms will be just that –multipurpose, akin to primary school design. However, we feel that the needs of our secondary school children are different from those in primary, and they need to develop their life long skills using appropriate equipment and space. How well planned and effective home economic lessons can be delivered in a general purpose room is beyond our comprehension. Surely this design will make it nigh on impossible for Cedarbank staff to : <i>"develop and refresh the curriculum on a regular basis and manage curriculum change and innovation to improve the range and quality of experiences and outcomes for children".</i> 6. <i>Agencies and partners will continue to work closely together to support and inform the planning process for learners. This involves a range of agencies and staff to meet the individual needs of each child. These include:</i> <i>☐ Educational Psychology ☐ School Community Paediatrician ☐ School Nurse ☐ Speech and Language Therapy ☐ Physiotherapy ☐ Occupational Therapy</i> It remains to be seen whether the amount of rooms allocated to the school will facilitate the effective involvement of the above agencies. Other agencies used regularly in school include counsellors, social work etc. 7. <i>"For all pupils, outdoor learning is an integral feature of their education"</i> In the preconsultation meeting, parents expressed a need for our young people to have a large outdoor area because the outdoor space currently at Cedarbank is limited. It is probably the smallest in West Lothian. Indeed, to ensure that the needs of our young people are being met and the council's acknowledgement in the <i>"positive impact on the outdoor learning environment for pupils"</i> (quote from consultation above), we remain concerned that the potential of the available space is not being fully met. We are concerned that it is being determined by the budget, not the adequate needs of our young people. As parents, we want WLC to consider extending the fence line to the East, thus including the existing level grassed area. We can only stress the importance for our young adults to have access to as much external space as possible but within a control area. 8. <i>Safety.</i> The suggestion that toilets will be unisex are of the utmost concern. Never mind the safety issue, it demonstrates a complete ignorance of the issues our children experience on a daily basis. To baldly spell this out, girls are experiencing puberty
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	and some need help to keep themselves hygienic at school ; these young people often do not (or cannot) close toilet doors; some children have overly sexualised tendencies and not the capability to manage these. To repeat unisex toilets and changing areas are not acceptable to us. We are certain, however, that WLC will reconsider their design to revert to a separate areas. 9. <i>“As an additional support needs secondary school provision, Cedarbank School will be well placed to ensure that the pupils experience challenge and progression through consistent, well-planned teaching which is flexible and responsive”</i> Having a combined Gym Hall / Dining area would seriously undermine the above need. We are concerned that this would impact on the PE curriculum (a vital part of the Cedarbank curriculum that should not be compromised) especially if the school was holding an event for e.g. S2 open day, life skills events, etc then the hall would not be available for PE as no alternative space is available. WLC have suggested that our young people would have to use internal rooms should they need more secluded space during lunch times. Again, we feel this is not sufficient to meet the adequate needs of our young people. Even with factoring in special needs adjustment, this is simply not on a parity with other mainstream pupils in West Lothian and is unfair. It precludes the possibility of having a PE lunchtime club, such as badminton, boccia etc. 10. School Admin areas – some of the office spaces / meeting rooms were internal (no access to windows etc). We think that this approach is not the most cost effective as it requires additional costs due to needing mechanical ventilation. This space would be better located near and external wall to get free benefit of fresh air. Additionally, writing as someone who once worked in a basement, the importance of the health and well-being of staff cannot be underestimated. Working in areas with natural daylight and fresh air is desirable.
Parent	I have a number of issues re the new Cedarbank School. 1. It will not be big enough. The population of WL is increasing, so too therefore will the ASN requirement. Also, there seems to be a shared gym/ lunch hall and no home economics room amongst other areas. Surely if this is to be a free standing school, all available amenities need to be available for these young people. Timetabling issues of sharing with a mainstream high school are just not equitable... 2. I have a major problem with the idea of unisex toilets and changing rooms. Whilst this might work in regular mainstream schools, and I also doubt this, in a special needs school for teenagers, this would be a dreadful mistake. It is not just a fact that the girls in particular would not be happy with this, but it is a safety issue. I am 100% against this idea. 3. At the consultation meeting recently at Cedarbank, the idea of 'soft boundaries' was mentioned around the new school. Again, issues of safety here. These are vulnerable young people who need protecting. Clearly defined boundaries are necessary. 4. The idea of internal working spaces are not workable as the Civic Centre WLC building in Livingston has shown! Sitting in one of those internal rooms on a hot

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	day was unbearable as many workers have commented. I understand budget cuts will naturally be guiding this build. However, the safety, not to mention the rights of these young people need to be taken into careful consideration.
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3 NOTES OF PUBLIC MEETING**3.1 Cedarbank School:**

**MINUTE OF PUBLIC MEETING HELD IN CEDARBANK SCHOOL, LIVINGSTON
18 SEPTEMBER 2019, TO DISCUSS PUBLIC CONSULTATION DOCUMENT:
“Relocation of Cedarbank School, Livingston”**

In attendance from West Lothian Council:

Councillor David Dodds	Executive Councillor for Education
James Cameron	Head of Education (Learning, Policy and Resources)
Alison Raeburn	Inclusion and Wellbeing Manager
Catherine Campbell	Senior Education Development Officer
Ken Scriven	Architect, Construction and Design, West Lothian Council
Ann O’hagan	Head Teacher, Cedarbank School
Patricia Gallagher	Head Teacher, The James Young High School
Melanie Laurie	Education Project Officer

Minute taker:

Melanie Laurie	Education Project Officer
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Meeting attendees (from sign in sheet): 13 attendees

Education Services Presentation:

Education Services

- **Introduction** - James Cameron – Head of Education (Learning, Policy and Resources) commenced presentation by introducing all West Lothian Council officers, delivering an overview of individual responsibilities held within the Authority and the specific obligations in relation to the proposal and project progression.
- **Aims of Consultation Meeting** - James Cameron
 - In accordance with the Schools (Consultation) (Scotland) Act 2010 public consultations are necessary when a local authority proposes to make a change to the school estate, in this case relocation of a school.
 - It was advised that the statutory public meeting was an information sharing opportunity that offers explanation and reason behind the proposal.
 - A key aim of the meeting is to capture the views of consultees and utilise this information throughout the research and development process.
- **Summary of Proposal** – James Cameron
 - It is proposed to relocate Cedarbank School to purpose built accommodation offering S1-S6 education for pupils with a range of additional support needs related to learning difficulties and social communication needs.
 - Cedarbank to be relocated to a proposed preferred site within the estate of The James Young High School
 - Both Cedarbank School and The James Young High School will maintain their identity and remain defined schools
- **Rationale for Change** – James Cameron
 West Lothian Council undertook public consultation regarding Additional Support Needs (ASN) provision during 2013 to 2015.
 The aim of this review was to:
 - Secure best value in the structure of school provisions
 - Determine feasible modification and relocation options
 - Inform decisions on future delivery
 Outcome of Review:
 - Recognised need to consider options for relocation of Cedarbank school based on existing property asset performance and the identified requirement for delivery of a single S1-S6 education establishment.
- **Reconfiguration and Extension** – Catherine Campbell – Senior Education Development Officer
 - Initial design intentions are for an 11 class base facility, 1x general purpose room, 3x practical class areas , 1x multi-purpose hall and dining space
 - Current design and planning intentions recognise the aspirations of the Education Services brief and that the proposed floor and ground plans are indicative at this stage

Education Services

- o Building design will be future proof to allow for any possible expansion programme
 - o Delivery of new building scheduled for August 2022
- **Next Steps** – Melanie Laurie – Education Project Officer
 - o Collate and review feedback received during Statutory Consultation period
 - o November 2019 – West Lothian Council submit report on findings of Statutory Consultation to Education Scotland for review
 - o On receipt of response from Education Scotland, West Lothian Council prepare and publish Final Consultation Paper – publication schedule December 2019
 - o January 2020 – West Lothian Council Education Executive meet to review Final Consultation Paper and make final decision on proposal

End of Education Service Presentation

Discussion Opportunity - Councillor Dodds opened the floor to comments and questions:

Question/Comment - Attendee
A group member raised a concern that the proposed 15 class bases would not be enough to deliver a fully functional secondary school.
Response : West Lothian Council
Comment duly noted for the purpose of the minute and will be offered due regard.
Question/Comment - Attendee
A comment was made in relation to the size of the new facility with comparisons made to the size of the existing Cedarbank School. A concern was raised that the proposed new provision is smaller than the existing facility and that this will have a detrimental impact on the delivery of the curriculum.
Response : West Lothian Council
Comment noted. Officers explained that initial design specifications show the size of class bases are larger than current provisions at the existing Cedarbank building. It was further explained that the size of class space at the current Cedarbank provision is not conducive to the number of attending pupils and room usage requirements.
Question/Comment - Attendee
A meeting attendee questioned the proposed allocated area per pupil in the new school.
Response : West Lothian Council
Officers advised that whilst there are regulated metrics that must be followed when determining pupil space provisions, these guidelines refer to mainstream education facilities

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and that no specific statutory requirements in relation to Additional Support Needs establishments are referenced. Officers confirmed again that room sizes and individual pupil space will be significantly larger than current provisions. Officers further advised that as the design element of the project progresses further information on a whole building square meterage will be provided.
Question/Comment - Attendee
A question was asked as to the maximum number of pupils that the new building will be able to hold.
Response : West Lothian Council
It was explained by officers that the final design specification of the building and how the infrastructure is utilised will have an impact on the maximum number of pupils being accommodated at the school.
Question/Comment - Attendee
An attendee questioned this response, highlighting that at the Pre-Consultation exercise it was advised that school capacity at the new building would be 130 pupils.
Response : West Lothian Council
It was explained that there are key determinants that conclude the overall school capacity for example a high efficiency timetable structure and a comprehensive utilisation of space.
Question/Comment - Attendee
Again clarification was sought in relation to school capacity and pupil to classroom ratio with it being questioned that if there are 11 proposed class bases at the new provision with 10 pupils per room how does this equate to the 130 pupils quoted previously.
Response : West Lothian Council
As Cedarbank is a secondary school, rooms will be utilised in accordance with pupil timetable requirements. Officers also highlighted that initial design plans show 15 teaching spaces (11x class area, 1x general purpose room and 3x practical spaces).
Question/Comment - Attendee
Comment was made in relation to requirement for the new building to be futureproof to be able to accommodate the rising number of pupils. It was questioned whether expansion provisions could be incorporated in the design of the new building.
Response : West Lothian Council
Officers confirmed that potential expansion opportunities are included in the design brief.
Question/Comment - Attendee
In response, it was questioned whether officers could guarantee that if/when an extension to the property is delivered West Lothian Council will not simply place more and more pupils

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in to an already tightly spaced area.
Response : West Lothian Council
It was explained to attendees that pupil ratio and maximum number of pupils per class specifications are governed therefore room occupation will remain compliant with statutory requirements.
Question/Comment - Attendee
The views of The James Young High School community during the pre-consultation process were sought.
Response : West Lothian Council
It was advised that overall, The James Young High School were in favour of the proposal. Access routes were really the only action point raised at the previous Pre-Consultation meeting for officer address.
Question/Comment - Attendee
It was asked whether there is possibility of Cedarbank School remaining on the existing site with provision of an extension.
Response : West Lothian Council
Officers confirmed that a feasibility study had been conducted with all possible options considered. It was further advised that whilst the possibility for expansion was reviewed, it was concluded that the existing Cedarbank infrastructure would not meet brief specifications. Meeting attendees were advised that the cost for extension and refurbishment of the existing building would match if not be more expensive than the cost to relocate.
Question/Comment - Attendee
Clarification was sought on the overall cost of the proposed build with concerns being raised that the £6m budget allocation would not provide a facility fit for purpose.
Response : West Lothian Council
Officers explained that whilst a fixed sum of funding has been allocated within the Capital Programme for development of the overall Additional Support Needs School Estate this is an indicative 10 year programme and that initial funding implications can shift. Once the project reaches the market testing stage there will be a clearer and more specific indication of funding requirements.
Question/Comment - Attendee
It was asked by a meeting attendee when the new school building would be ready.
Response : West Lothian Council

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It was explained that should the Education Consultation and Planning Consultation be conducted successfully within the scheduled timelines there may be opportunity to take delivery of the new building prior to August 2022. Attendees were reminded that there may be other dependencies, unforeseen circumstances that could impact the project plan and intimated delivery date.

The Head Teacher of Cedarbank School contributed by explaining that ideally, preference would be to occupy the new building prior to August 2022. This would allow opportunity to offer an in depth transition programme for incoming pupils and allow existing pupils to commence their new year stage timetable in May in conjunction with existing timetabling arrangements.

Question/Comment - Attendee

Group discussions ensued in relation to sharing of school facilities and the possibility of shared outdoor space with some reservations being highlighted for Council officer comment.

Response : West Lothian Council

Cedarbank pupils will have opportunity to access the sports facilities and playing field area at The James Young High School as well as drama and art studio facilities.

Officers enforced that the Management of both schools will work collaboratively to ensure all pupils have equal access to provisions. Both schools will work in conjunction to ensure that when arranging timetable schedules the key priority is ensuring the children and young people of both schools have equal opportunity and can experience a curriculum appropriate to their individual level of need.

In relation to outdoor space, meeting attendees were informed that a separate outdoor space has been allocated for Cedarbank pupils final details of which will be communicated as the planning process progresses. The group were further advised that the outdoor space for pupils is an integral part of pupil education and that design of the outdoor space is just as crucial as those design interpretations for indoor space. Outdoor provisions will be appropriate to the age and individual needs of the children and young people of Cedarbank School.

No final decision on landscaping has been made as yet. As planning progresses the school community at Cedarbank will be encouraged to contribute and share their views in the design elements of the outdoor provision.

Question/Comment - Attendee

A group member raised dissatisfaction on not having access to drawings of the new building. The question was asked as to when drawings would be made available.

Response : West Lothian Council

Attendees were reminded that the reason for this evenings meeting was to consider and offer comment on the educational aspects of a relocation of Cedarbank School. A separate consultation in relation to planning will be initiated whereby design features will be open for discussion.

Officers reiterated that the design process is still very much at an indicative stage and that there are no definite design drawings for public review at this present time. It was explained that the Cedarbank school community will be welcomed to consider draft drawings as part of the Planning Consultation process. School pupils, staff and Parent Council members will certainly be consulted on the design element of the new building.

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Question/Comment - Attendee
In response to this explanation, it was advised by a member of the group that it was not possible to pass comment on the proposed relocation until such times that design intentions are made public and that it is crucial that this information is shared.
Response : West Lothian Council
This comment was noted for the minute.
Question/Comment - Attendee
Group were offered review of site plans indicating where within the estate of The James Young High School the new school would be located. A concern was raised in relation to the distance between both buildings. Comments were made on the possible time taken to travel from one building to another and that pupils will waste valuable education time transferring between facilities.
Response : West Lothian Council
This comment was noted for the minute.
Question/Comment - Attendee
Again, and on further review of the site plan, a concern was raised that there could be potential opportunity for The James Young High School users to utilise car parking and pickup/drop off areas at Cedarbank to avoid existing traffic issues at the Quentin Rise area. It was suggested that Council officers consider the implications of this.
Response : West Lothian Council
Comment was noted and will be considered as part of the Traffic Management Plan process.
Question/Comment - Attendee
After being offered a summary of the initial proposal being taken forward, meeting attendees commented favourably on the proposed relocation of Cedarbank School to The James Young High School estate. The proposed dedicated provisions i.e. access and parking areas, outdoor space, large hall and dining area were all well received.

Meeting Close:

Group were thanked for their attendance and participation in discussions.

3.2 The James Young High School:

**MINUTE OF PUBLIC MEETING HELD AT THE JAMES YOUNG HIGH SCHOOL
26 SEPTEMBER 2019, TO DISCUSS PUBLIC CONSULTATION DOCUMENT:
"Relocation of Cedarbank School, Livingston"**

In attendance from West Lothian Council:

Councillor David Dodds	Executive Councillor for Education
James Cameron	Head of Education (Learning, Policy and Resources)
Alison Raeburn	Inclusion and Wellbeing Manager
Catherine Campbell	Senior Education Development Officer
Patricia Gallagher	Head Teacher, The James Young High School
Melanie Laurie	Education Project Officer

Minute taker:

Melanie Laurie	Education Project Officer
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Meeting attendees (from sign in sheet): 12 attendees

Education Services Presentation:

- **Introduction** - James Cameron – Head of Education (Learning, Policy and Resources) commenced presentation by introducing all West Lothian Council officers, delivering an overview of individual responsibilities held within the Authority and the specific obligations in relation to the proposal and project progression.
- **Aims of Consultation Meeting** - James Cameron
 - In accordance with the Schools (Consultation) (Scotland) Act 2010 public consultations are necessary when a local authority proposes to make a change to the school estate, in this case relocation of a school.
 - It was advised that the statutory public meeting was an information sharing opportunity that offers explanation and reason behind the proposal.
 - A key aim of the meeting is to capture the views of consultees and utilise the information throughout the research and development process.
- **Summary of Proposal** – James Cameron
 - It is proposed to relocate Cedarbank School to purpose built accommodation offering S1-S6 education for pupils with a range of additional support needs related to learning difficulties and social communication needs.
 - Cedarbank to be relocated to a proposed preferred site within the estate of The James Young High School

Education Services

- o Both Cedarbank School and The James Young High School will maintain their identity and remain defined schools

- **Rationale for Change** – James Cameron

West Lothian Council undertook public consultation regarding Additional Support Needs (ASN) provision during 2013 to 2015.

The aim of this review was to:

- o Secure best value in the structure of school provisions
- o Determine feasible modification and relocation options
- o Inform decisions on future delivery

Outcome of Review:

- o Recognised need to consider options for relocation of Cedarbank school based on existing property asset performance and the identified requirement for delivery of a single S1-S6 education establishment.

- **Reconfiguration and Extension** – Catherine Campbell – Senior Education Development Officer

- o Initial design intentions are for an 11 class base facility, 1x general purpose room, 3x practical class areas , 1x multi-purpose hall and dining space
- o Current design and planning intentions recognise the aspirations of the Education Services brief and that the proposed floor and ground plans are indicative at this stage.
- o Building design will be future proof to allow for any possible expansion programme
- o Delivery of new building scheduled for August 2022

- **Next Steps** – Melanie Laurie – Education Project Officer

- o Collate and review feedback received from Statutory Consultation period
- o November 2019 – West Lothian Council submit report on findings of Statutory Consultation to Education Scotland for review
- o On receipt of response from Education Scotland, West Lothian Council prepare and publish Final Consultation Paper – publication schedule December 2019
- o January 2020 – West Lothian Council Education Executive meet to review Final Consultation Paper and make final decision on proposal

End of Education Service Presentation:

Discussion Opportunity - Councillor Dodds opened the floor to comments and questions:

Question/Comment - Attendee

An attendee asked if the proposals had any impact on the football pitches at The James Young High School.

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Response : West Lothian Council
Officers advised that the proposed designated site at Quarry Park will not impact any of The James Young High School football pitches.
Question/Comment - Attendee
A meeting attendee asked for further information regarding the education provision proposed at Cedarbank Secondary School.
Response : West Lothian Council
Officers advised that the education brief consisted of eleven classrooms, three practical rooms, one general purpose space, a games hall, pupil changing facilities, administration offices, meeting rooms and landscaped outdoor teaching space. The building design was likely to be two storeys with a footprint of 1730m ² .
Question/Comment - Attendee
Clarification regarding the capacity of the new Cedarbank Secondary School was sought.
Response : West Lothian Council
The Head of Education explained that this was a like for like replacement with the current school roll of approximately 100 pupils. However, placing requests have to be met and the new school could accommodate up to 110 pupils with the proposed number of teaching spaces.
Question/Comment - Attendee
In response, one attendee asked if the school design had the capacity to be extended if required in the future.
Response : West Lothian Council
Officers explained that the building design would be future proofed for any possible expansion programme.
Question/Comment - Attendee
Further to this, an attendee asked for clarification with regard to dining in the new school and if any expansion would include hall and dining space.
Response : West Lothian Council
Officers explained that hall and dining space are always considered in expansion programmes and increased where required. Furthermore, the current proposal includes a receiving kitchen and dining space in the hall. It was explained that this solution is managed in many school across the Authority. However, architects are working on a solution to support some pupils where this space might not be appropriate. Including, opening up the Life Skills room and incorporating booths within the school.

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Question/Comment - Attendee
An attendee commented that the Parent Council of The James Young High School were very supportive of the proposals and felt it offered many opportunities to both Cedarbank Secondary School and James Young High School pupils.
Response : West Lothian Council
Comment noted. The Head Teacher of The James Young High School responded by explaining that her team didn't foresee any issues with the proposals. Indeed she saw many opportunities for collaboration.
Question/Comment - Attendee
This was followed up by a question regarding how Cedarbank School pupils might access the curriculum at The James Young High School.
Response : West Lothian Council
The Head Teacher further explained, though Cedarbank School would be self-sufficient, if a young person at Cedarbank Secondary School wanted to access the curriculum at The James Young High School she would ensure that they had the same access of opportunity as any other pupil.
Question/Comment - Attendee
An attended asked if The James Young High School was over capacity.
Response : West Lothian Council
The Head Teacher indicated that The James Young High School was not over capacity and could cope with the small numbers of pupils from Cedarbank accessing their curriculum.
Question/Comment - Attendee
Group discussions ensued in relation to curriculum opportunities and how many pupils currently at Cedarbank School benefit from access to specialist subjects and courses at Deans CHS and Armadale Academy.
Response : West Lothian Council
Officers indicated that it was anticipated that this relationship would continue at The James Young High School.
Question/Comment - Attendee
A group member asked whether there would be opportunities for The James Young High School pupils to go to Cedarbank School.
Response : West Lothian Council
Officers confirmed that there will be opportunities for pupils to work across both schools. This would be down to the schools to manage this.

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Question/Comment - Attendee
There were several questions regarding the school design and how this would help inform any decision making regarding this proposal.
Response : West Lothian Council
Comments noted. Officers explained that they had been in touch with the school to organise staff, pupil and Parent Council meetings prior to the Statutory Consultation deadline of the 30 th October to consult on new school layouts.
Question/Comment - Attendee
An attendee asked when the first pupils would arrive at Cedarbank Secondary School.
Response : West Lothian Council
The Head of Education explained that the initial proposed school opening date was August 2022. However, contractors have indicated that earlier occupancy may be possible. Pupils will have transition site visits to support them in their move.
Question/Comment - Attendee
A follow up question was asked regarding the opening of the new Pinewood School facility.
Response : West Lothian Council
Officers advised that both projects were running concurrently and it was anticipated that both schools would open at the same time.
Question/Comment - Attendee
A concern was raised regarding the construction noise and how this would be mitigated.
Response : West Lothian Council
Comment noted. Officers explained that the construction site at Quarry Park was some distance from the school and that the construction company had experience of working around the school day. The Head Teacher of The James Young High School reassured the attendee that construction at a nearer site on Quentin Rise could not be heard within the school building.
Question/Comment - Attendee
A representative from The James Young Parent Council asked if there was anything that pupils from either school would lose out on with this new proposal.
Response : West Lothian Council
Question Welcomed. Officers indicated that the educational benefits of the proposal were positive for young people at both Cedarbank School and The James Young High School. These were outlined in the draft consultation paper and would be revised in the report to Education Scotland for consideration.

Meeting Close:

Group were thanked for their attendance and participation in discussions.

4. REPORT BY EDUCATION SCOTLAND

Education Scotland has written a report on West Lothian Council's proposal to relocate Cedarbank School, Livingston as part of the Council's continuing commitment to ensure equitable, quality and sustainable provision for pupils with additional support needs.

Education Scotland agrees that this proposal has significant potential educational benefits for young people who currently attend Cedarbank School. They would have access to a more flexible, modern and integrated learning environment, with ready access to the curriculum opportunities and resources of The James Young High School. In preparing its final report, the council should address the issues raised by parents and staff relating to the specifications for the new school. In taking its proposal forward, an effective communication strategy and an action plan will be essential for the council to keep all stakeholders informed and engaged in this development. The council should include details of these in its final report.

The full Education Scotland report is attached as Appendix C.

Appendix A

West Lothian Civic Centre
Howden South Road
Livingston
West Lothian
EH54 6FF

Contact: James Cameron

Tel 01506 281680

E-mail: james.cameron@westlothian.gov.uk

9 September 2019

Dear Consultee

West Lothian Council Education Services

Proposal to Relocate Cedarbank School, Livingston

West Lothian Council's Education Executive at its meeting on 23 April 2019, authorised West Lothian Council's Education Services to commence statutory consultation on the proposal to relocate Cedarbank School, Livingston.

The consultation document outlining the proposal is available online from 9 September 2019 on the following webpage: www.westlothian.gov.uk/cedarbank-relocation-consultation

Hard copies of the consultation document are also available for uplift from the Civic Centre, Howden South Road, Livingston, EH54 6FF or can be requested in writing from:

Melanie Laurie, Project Officer, West Lothian Council Education Services, Civic Centre,
Howden South Road, Livingston, EH54 6FF.

The consultation period is from Monday 9 September 2019 to Wednesday 30 October 2019.

Public meetings to discuss the consultation document will be held at:

- Cedarbank School on Wednesday 18 September 2019 at 6.30pm-8.00pm.
- The James Young High School on Thursday 26 September at 6.30-8.00pm.

You are also invited to submit your comments on the consultation in writing to Melanie Laurie at the above address or by e-mail to: Education.Consultation@westlothian.gov.uk

For written representations to be considered they must be received no later than 5pm on Wednesday 30 October 2019.

A decision on the proposal is planned to be made in January 2020 by the Council's Education Executive. This decision will be based on feedback received from all stakeholders through written responses and feedback from meetings and from feedback received from Education Scotland.

Yours sincerely



James Cameron
Head of Education (Learning, Policy and Resources)