

Report



Cabinet Member for Education and Skills

Part 1

Date: 24 April 2020

Subject 21st Century Schools and Colleges Programme – Programme and funding review

Purpose To seek approval for proposed changes to the 21st Century Schools and Colleges Programme that will change the programme funding profile to increase the budget for Bassaleg School. This will enable an overall greater strategic benefit by removing an additional poor conditioned building. To accommodate the proposed increase in funding there is a requirement to remove three projects from the 21st Century Schools and Colleges Band B Programme.

Author 21st Century Schools Manager

Ward All

Summary Welsh Government's 21st Century Schools and Colleges Programme provides capital investment to improve education facilities. The second band of funding was agreed with the programme commencing in April 2019 and is expected to be complete by March 2024.

A Strategic Outline Programme was submitted in July 2017, which identified a list of proposed schools that would potentially receive capital investment from a funding envelope of £70M. The proposed schools had been determined by the Council's strategic aims, which are in line with those of the 21st Century Schools and Colleges Programme by reducing the number of poor condition schools and ensuring there are sufficient places available in Newport.

Priority projects are currently in the design phase that has highlighted the greater benefits that could be delivered if a greater level of funding could be provided for the project at Bassaleg School. There is no additional funding being requested, however the proposal would see a change in the programme where three proposals would be removed from the programme.

Proposal To agree an increase to the budget allocation within the 21st Century Schools and Colleges Programme for Bassaleg School and remove three projects from the programme.

Action by Chief Education Officer

Timetable Immediate

This report was prepared after consultation with:

- Cabinet Member for Education & Skills
- People Services Capital Programme Board
- Education Senior Management Team
- Welsh Government Capital Finance Team
- Newport Norse

Signed

****Due to the impact of Covid-19 the decision made on this Cabinet Report will be taken under delegated powers. The Leader, Councillor Jane Mudd has declared an interest so the decision will be taken by Councillor Gail Giles, Cabinet Member for Education & Skills.****

Background

In December 2017, the Newport City Council 21st Century Schools and Colleges (21CS) Band B Programme received approval in principle for a £70M funding envelope following the submission of a Strategic Outline Programme (SOP) with Welsh Government providing an improved 65% contribution towards the capital grant funding.

The schools identified for investment are as follows:

Secondary Schools programme:

- Bassaleg School
- Caerleon Comprehensive
- Ysgol Gyfun Gwent Is Coed

Primary Schools Programme

- Whiteheads Primary School Development
- Maesglas Primary
- Pillgwenlly Primary
- Maindee Primary
- Glan Llyn and Llanwern Primaries (Furniture, Fixtures and Equipment only)
- Rogerstone Primary
- St Woolos Primary
- Malpas Church in Wales

The 21CS Band B Programme will run alongside other capital funding programmes such as the Welsh-medium Capital Grant that will provide an additional £5.8M, and the Reducing Infant Class Size grant which will provide £580k of funding for St. Woolos Primary School and £520k funding for Maesglas Primary School.

While initial project funding allocations were indicative at the time of the submission of the SOP, the funding allocations will continue to be reviewed as the programme progresses. As an example, the budget available for the Ysgol Gyfun Gwent Is Coed project has increased to accommodate continued market cost increases and essential requirements within the project. Reasonable adjustments to other project budgets enabled the budget to be increased while maintaining the £70m envelope.

Following the submission and subsequent approval of a Welsh-medium capital grant bid, the Pillgwenlly Primary School project, initially included within the Band B programme as expansion to 3FE has been removed from the Band B programme. The Band B funding allocation for this project has transferred to the Whiteheads new build project to support increased scope to 3FE. The Pillgwenlly Primary School building will be refurbished to accommodate a newly-established Welsh-medium primary school, funded by the Welsh-medium Capital Grant.

Current Budget allocations

The table provides the indicative budget estimates that have been allocated for the 21CS Band B Programme:

Project Name	NCC Funded Element	Welsh Government Support	Total
Ysgol Gyfun Gwent Is Coed	16,592,023	28,891,250	45,483,273
Bassaleg School			
Caerleon Comprehensive School			
New School -Whiteheads site	8,623,260	15,691,652	24,314,912
Maesglas Primary			
Maindee Primary			
Rogerstone Primary			
Pillgwenlly Primary			
Malpas CIW Primary			
St. Woolos Primary			
West Glan Llyn Primary			
Llanwern Village Primary School			
Unallocated balance			201,815

Proposed change to 21CS Band B Programme

The Capital Funding Branch within Welsh Government met with the NCC 21st Century Schools Team at Bassaleg School to review the proposed 21CS Band B programme. The visit also included a tour of the existing facilities at the school and a full briefing was provided on each project within the proposed programme.

While all projects within the proposed programme have received an initial approval within the SOP, concerns were raised that buildings considered to be in very poor condition at Bassaleg School would not be removed within the Band B Project. The proposal for Bassaleg School would increase the pupil places within the school to 2050, which is essential due to the significant pupil pressures within the Bassaleg catchment. In addition, demountable buildings will be removed from the site and replaced with permanent classrooms within a new teaching block.

It was made clear that Welsh Government would view a project with a greater strategic view and providing a "one time" investment with a major impact more favourably. Taking this advice from Welsh Government it has been considered that the existing Griffin building could be replaced if the proposed new teaching block was increased to a three-storey building. This would result in a building considered to be the worst in our estate after Block 1 at YGGIC, being replaced, resulting in a significant reduction to the corporate capital maintenance backlog.

Additional funding through the 21CS Band B Programme is not available. To provide an opportunity for the improved project at Bassaleg School would require some changes to the 21CS Band B Programme. The 21CS Team has considered all funding options and if additional capital funding is not available through central funding or additional borrowing then the following option is requested to be considered by Cabinet. If this option receives approval then further approvals would be required through Welsh Government and an amended Strategic Outline Programme will be submitted to Welsh Government at the earliest opportunity.

21CS Band B – Programme alteration proposal

To provide Bassaleg School with sufficient funding to remove the Griffin building and provide a significantly improved project the following projects are proposed to be removed from the 21CS Band B Programme:

- Rogerstone Primary School
- Malpas Church in Wales Primary School
- St Woolos Primary School

Removing the three projects from the programme would deliver an additional £6,000,000 that could be allocated to the Bassaleg School project.

Furthermore, Section 106 Housing Development funding is available for use at Bassaleg School, which could provide £3,134,163 in additional funding. There are two developments that have matured, which are Tredegar Park Golf Course (£545,181) and the Alcan Development (£2,588,982). The housing developments have reached a stage where the Council has secured the income. The majority of funding has already been received and one final invoice on the Alcan Development has been issued with payment expected in the near future. In addition, the remaining programme unallocated balance of £201,815 can further support the proposed increase for Bassaleg School.

The option identified would increase the budget for the secondary allocation significantly and increase the indicative budget to £54,819,250 including the S106 Housing Contribution identified to be utilised at Bassaleg School. Early indications suggest that the increased funding amount would allow the three-storey block to be constructed while removing the Griffin building from the site. Further development of designs could allow the provision of a new sports hall to be provided as this would remove further poor conditioned buildings from the Bassaleg School site. This option could be indicated within future planning applications, which could provide planning approval to build the sports hall at a later stage. The proposed changes have been illustrated in the table below:

Project Name	NCC Funded Element	Welsh Government Support	Additional Funding (S106)	Total
Ysgol Gyfun Gwent Is Coed				
Bassaleg School	18,899,079	32,786,008	3,134,163	54,819,250
Caerleon Comprehensive School				
New School -Whiteheads site				
Maesglas Primary				
Maindee Primary	6,518,019	11,796,893	0	18,314,912
West Glan Llyn Primary				
Llanwern Village Primary School				
	25,417,098	44,582,902	3,134,163	73,134,163

As highlighted, this proposal would result in three projects being removed from the programme to accommodate the increased funding for the Bassaleg School project. Information is provided below for the three projects that may be affected:

- Rogerstone Primary

The project was proposed to expand the school to 3-form entry (630 pupils plus SEN and nursery provision). Updated pupil forecasts suggest that the pressure on primary places within the area is expected to reduce and the suggested expansion may not be required or at least could be deferred to a later date.

Due to the pressure on pupil places within the Bassaleg catchment an expansion of Rogerstone Primary School has the potential to provide further pressures on the secondary school by the number of places within the catchment being greater than the available places within the proposed expansion at Bassaleg School.

- Malpas Church in Wales Primary

The project is currently proposed to improve the curriculum delivery at the school. The impact from the project would be minimal in comparison to the impact from an improved Bassaleg School project. Welsh Government has also indicated a reluctance to support smaller remodelling/refurbishment projects under the 21CS Band B Programme so gaining business case approvals could be difficult.

- St Woolos Primary

The available budget under the 21CS programme for this project is understood to be restrictive, being likely to deliver only minor refurbishment benefits. This would be further constrained by the listed status of the building. As with the Malpas Church in Wales project, Welsh Government has also indicated a reluctance to support smaller remodelling/refurbishment projects under the 21CS Programme so gaining business case approvals could be difficult.

Independent of the 21CS programme, the school will receive a significant amount of funding (£580,000) from the Reducing Infant Class Size Grant to remodel the building previously used by a boxing club. This was considered as an aspiration within the initial Band B project. Due to the alternative funding provision, the school will still benefit from some capital investment as the project is planned to be delivered in the September 2020 academic year.

Key benefits

The key benefits from the proposed changes to the 21CS Band B are:

- **Backlog maintenance reduction.** A Significant reduction in backlog maintenance costs are expected following the removing the following buildings:
 - Griffin Teaching Accommodation (3 storey building) - £1m
 - 10 brick enforced demountable classrooms (Forge Building) £700k
 - Dining facilities (Forge Building) £300k
 - Drama Block £112k
 - 6 demountable classrooms (History/music) £150k

The estimated reduction in the backlog maintenance costs are over £2.25m. The main issues with the existing buildings are related to but not exclusive of roof structures, windows, internal doors walls floors and ceilings, while the thermal performance of the buildings are considered poor. In addition to the reduced maintenance costs and improved compliance under the Equalities Act there will also be significant benefits concerning the performance of a new build. A large amount of savings would be expected from an energy efficient building while the power used would be considered a better option when considering systems that would provide a more environmentally friendly building using greener energy sources.

- **Improved use of capital funding.** The proposed project would result in one strategic project rather than a number of capital projects being completed to replace buildings at Bassaleg School that are in poor condition. This option would provide a better use of funding and an increase in terms of value for money. The buildings being considered for replacement are in

very poor condition. The building will require replacement in the near future while considerable maintenance funding would be required to ensure the building remains safe to use.

Replacing buildings that are in poor condition will also provide longer-term benefits for the Council. A new building will be designed to last for at least 60 years with a refurbished existing facility providing a much less of a benefit, dependent on the condition of the structure that is in place.

The initial proposal required a significant amount of refurbishment to the existing buildings. A project that focused more on a mixed economy is expected to significantly increase costs and has the potential to become unaffordable when considering the original budget allocation of £18.5M. To replace the existing demountable classroom and provide additional classrooms for the proposed expansion would require a new building of approximately 7500 sqm and refurbishment of around 5000 sqm while removing the Griffin Building (teaching space) would require a 9000 sqm new build with only 1150 sqm of refurbishment required.

- **Effective use of Section 106 Housing Development contributions.** Using the available funding as part of a larger project is expected to deliver a more significant return rather than spending the contributions in isolation. Cost efficiencies would be expected, as an example there would be an expectation of reductions in costs linked to contractor site setup and preliminary costs.

Financial Summary

Capital

No additional funding is being requested due to this proposal. The funding envelope for the 21CS Band B Programme would remain at £70M with the additional Section 106 Housing Development funding highlighted in the report being added to the Bassaleg School budget. The proposed use of the S106 funding is considered appropriate use and would comply with the legal agreements for the Tredegar Park Golf Course and Alcan housing developments.

Revenue

The overall expansion of pupil numbers at Bassaleg School will be the same as originally proposed. This proposal will not provide any additional pupil places over and above the original proposal, so there will not be any additional staffing costs. However, the proposal is expected to provide a greater level of benefits by reducing operational costs and removing a significant maintenance pressure from the Council.

In addition, should the proposed expansion of Rogerstone Primary School be removed from the programme the additional staffing costs associated with that proposal will not be required for the foreseeable future.

Risks

Risk	Impact of Risk if it occurs* (H/M/L)	Probability of risk occurring (H/M/L)	What is the Council doing or what has it done to avoid the risk or reduce its effect	Who is responsible for dealing with the risk?
Failure to Deliver the Bassaleg School project within the allocated budget.	H	M	The proposal made to increase the level of funding to the project and focusing on a larger new build element is expected to provide an affordable project. The original proposal with a higher level of refurbishment works to existing buildings is anticipated to be less affordable should the original budget remain even with the additional Section 106 funding.	21 st Century Schools Manager
21CS Band B Programme delay.	M	M	Whilst the 21CS programme is planned over 5 years, the cash flow requires careful planning to avoid financial difficulties. The expansion of Bassaleg School is planned for September 2023 and any significant delay in decision-making is likely to affect this unless further temporary accommodation is provided at an additional cost.	Service Manager (Resources & Planning)
Future costs to maintain or replace the Griffin Block at Bassaleg School	H	H	While the Council's Capital Asset Maintenance Programme could provide some funding for repairs, the building is considered to be in very poor condition. The replacement of the building will be required in the short to medium term. There are no known additional funding options available.	Newport Norse
Impact on schools/projects removed from the 21CS Band B Programme.	L	M	While there will be obvious disappointment for the proposed schools to be removed from the programme, the requirement to expand Rogerstone Primary is not considered a significant pressure. St Woolos Primary School will receive a significant amount of capital funding through the Reducing Infant Class Size Grant.	Chief Education Officer

Links to Council Policies and Priorities

Wellbeing of Future Generations (Wales) Act 2015
Corporate Plan
Council Improvement Plan (*Aspirational People* theme)
Education Service Plan
21st Century Schools Band B Programme

Options Available

Option 1: To maintain the status quo and continue to with the proposed 21CS Band B Programme.

Option 2: To progress with the proposed Band B Programme but remove Rogerstone Primary project as the expansion of the schools is not required in the foreseeable future. This would leave the proposed projects at St Woolos Primary or Malpas Church in Wales Primary in the programme. The secondary budget allocation would increase to £52,319,250.

Option 3: To approve the proposal and to proceed with the more significant project at Bassaleg School while removing the three schools from the programme.

Preferred Option and Why

The preferred option is Option 3. This option provides the greater level of benefit for the Council while also providing a significantly improved project at Bassaleg School. The benefits demonstrated in regard to the significant reduction in backlog maintenance and strategic longer-term investment highlights the rationale behind the Bassaleg School project being considered a greater priority over the projects that are proposed to be removed for the scheme.

Comments of Cabinet Member for Education & Skills

Following a review, it has been necessary to re- prioritise the programme in order to address the condition of some of our worst education buildings. This proposal represents the necessary course of action in terms of what is essential at this time. Given the strategic drivers of the 21st Century Schools and Colleges Programme, I support the proposal.

Comments of Chief Financial Officer

This report proposes a change to the Band B programme, but the level of borrowing remains within the funding envelope that was agreed by Cabinet previously. The report does increase the programme from £70m to £73.1m with the increase in funding coming from secured Section 106 monies that are ring-fenced for such a scheme.

The revenue impact of the Band B programme are included in the Medium Term Financial Plan, this will be continuously reviewed and updated to reflect any updates coming from the projection of school places.

Comments of Monitoring Officer

There are no legal issues arising from the report.

Comments of Head of People and Business Change

Delivering a quality education for children is essential in achieving long-term individual and societal wellbeing benefits. The proposal to amend the 21st Century Schools programme to provide an enhanced project at Bassaleg School is expected to deliver long-term benefits for both the school and the Local Authority. The plan to expand the school capacity should provide a greater level of assurance that places are available at their local secondary school to pupils within the catchment area. In addition, the proposal aims to remove a greater number of poor conditioned buildings from the Council's buildings portfolio, which would require high levels of reactive maintenance in the short to medium term. A new teaching block at the school would instead offer a long-term, high quality facility. The proposal will be funded by careful review of the programme as outlined in the

report, considering how the council can achieve best value sustainable development from the 21st Century schools grant and s.106 developers contributions. A formal statutory consultation, including pupil voice, for the proposed expansion at Bassaleg School will be carried out and supported at each stage by a FEIA to consider impact.

Comments of Non-Executive Members

Councillor J Watkins:

Thank you for this information, whilst I am in agreement with the plan to extend improvements to the Bassaleg learning environment I am saddened that it will be at the expense of the three Primary schools you have listed.

Of course, the teaching and learning in schools are the highest priorities, however, a safe and comfortable learning environment is also important and sadly, the standard of the environments in some of our schools is not of a good standard.

This is a situation which the Cabinet Member should be mindful of, and making efforts to ensure improvements are implemented as soon as possible.

As a Governor at Caerleon Comprehensive School I am very aware of the poor condition of the learning environment there, an environment which has been endured by staff and students alike for a very long time.

I look forward to implementation of considerable improvements alongside Bassaleg in the very near future.

Response:

Thank you for your comments and support for the recommendations made within the Cabinet report.

The proposal for capital investment at the three affected schools had been included within the 21st Century Schools Band B Programme. The full programme received the first level of approval through the submission of the Council's Strategic Outline Programme. Following this, each project requires a number of individual business cases to be submitted and approvals for each project would be required. To assist with this the programme was prioritised on strategic needs and unfortunately due to significant pressures within the City the proposed projects at Malpas Church in Wales Primary and St. Woolos Primary were considered two of the lower priority schemes.

While it is evident that capital investment would assist the schools, the project was also a risk under the Welsh Government Band B proposals due to the potential size of the projects. The proposed improvements were not viewed as a significant strategic change when compared to other projects within the programme and indications from Welsh Government highlighted that gaining future business case approvals would likely be difficult.

The project at Rogerstone Primary was to expand the school by 210 pupils. Forecasts are now highlighting that the expansion is not required at this time due to the opening of Jubilee Park Primary being brought forward by the housing developer.

The recommendations made in the report will not impact on the investment proposed for Caerleon Comprehensive School under the 21st Century Schools Programme. While the project at Caerleon Comprehensive School is a priority the scheduling for the programme must consider the Council's financial position. Projects are staggered to ensure sound financial management of the grant contributions required by Newport City Council, however design works for the investment at Caerleon Comprehensive School are expected to commence in the coming months.

Councillor R White:

Given the pressure on pupil numbers from the catchment area due to several large housing developments in the catchment area in recent years and the poor state of the existing and temporary buildings on the school site it has been obvious for some years that Bassaleg School needs improving.

I would agree with the proposals in the report to ensure that enough capital is available to provide the enhanced facilities that Bassaleg School requires to continue to provide the excellent teaching regime which already exists.

I note in the report that it is proposed that the new buildings will have a 60 year life. It should be noted that the Griffin Building, which it is proposed to be demolished, is nearly 60 years old. The new buildings should be designed and built to a standard that is compatible with the existing Forge Building in both longevity and design that will last as long as that building which is approximately 80+ years old.

Response:

The new building will meet the current building standards with a minimum life expectancy of 60 years. British Standards for a school building would be categorised as level 4 where structure will have an expected design life of 50 years. The new school building will be in excess of this and will be in compliance with the Welsh Government grant criteria for the 21st Century Schools and Colleges Programme. As with any building, there are other factors that will affect the building to ensure they remain fit for purpose such as appropriate maintenance practices and environmental conditions.

The specification for the new building will be key, for example, it is probable that both the Forge and Griffin building would have been designed for a 60 year life. However, the external façade and roof finishes for the Griffin building have required a greater level of maintenance than the Forge building. The Design Team will consider all specifications during the design phase and this will also be considered through the Planning process.

Councillor D Williams:

I welcome the report in general but would make the following comments; the development should be of a high quality and should complement the remaining buildings. In particular, the replacement of Forge Hall and canteen should be with a high quality that do not overshadow the Forge Building. The development must also not preclude further development of the site.

Response from Gareth Draper, 21st Century Schools Manager:

Thank you for your comments. Under the 21st Century Schools & Colleges Grant criteria, the project will need to meet BREEAM environmental and sustainability standards, where a rating of excellent would be required. In addition, the proposed design will need to be acceptable to gain future planning approvals.

The design team will include members from the school alongside, Newport Norse, Education and the appropriate consultants to deliver the best possible outcome. The initial discussions within the design team have recognised the requirements to improve the site logistics by bringing the proposed new building closer to buildings that will remain on site and will complement the overall site.

Local issues

Scrutiny Committees

None

Equalities Impact Assessment

The Equality Act 2010 contains a Public Sector Equality Duty which came into force on 06 April 2011. The Act identifies a number of 'protected characteristics', namely age; disability; gender reassignment; pregnancy and maternity; race; religion or belief; sex; sexual orientation; marriage and civil partnership. The new single duty aims to integrate consideration of equality and good relations into the regular business of public authorities. Compliance with the duty is a legal obligation and is intended to result in better informed decision-making and policy development and services that are more effective for users. In exercising its functions, the Council must have due regard to the need to: eliminate unlawful discrimination, harassment, victimisation and other conduct that is prohibited by the Act; advance equality of opportunity between persons who share a protected characteristic and those who do not; and foster good relations between persons who share a protected characteristic and those who do not. The Act is not overly prescriptive about the approach a public authority should take to ensure due regard, although it does set out that due regard to advancing equality involves: removing or minimising disadvantages suffered by people due to their protected characteristics; taking steps to meet the needs of people from protected groups where these differ from the need of other people; and encouraging people from protected groups to participate in public life or in other activities where their participation is disproportionately low.

A Fairness & Equality Impact Assessment (FEIA) has also been developed and will be updated as the proposal progresses.

Children and Families (Wales) Measure

Children and Young People will be consulted as part of the statutory consultation process for Bassaleg School.

Wellbeing of Future Generations (Wales) Act 2015

Report writers need to indicate how they have considered the five things public bodies need to think about to show they have applied the sustainable development principle put into place by the Act. You will need to demonstrate you have considered the following:

- Long term: the importance of balancing short- term needs with the need to safeguard the ability to also meet long – term needs.

The proposal to provide an improved project at Bassaleg School is expected to deliver long-term benefits for both the school and the Local Authority. The proposal is expected to be delivered by September 2023 and address the short to medium term pressures on pupil places. The plan to expand the school to accommodate 2050 pupils is expected to provide a greater level of assurance that places are available at their local secondary school to pupils within the catchment area.

- Prevention: How acting to prevent problems occurring or getting worse may help us meet our objectives.

The proposal aims to remove a greater element of poor conditioned buildings from the Council's buildings portfolio. Should the buildings remain there will be an expectation that the building considered to be in poor condition will require significant maintenance or replacement in the short to medium term. The proposal aims to take advantage of the 65% Welsh Government contribution towards the funding under the 21st Century Schools & Colleges Programme. Any works to provide replacement buildings in the future may require 100% Council funding to be provided.

- Integration: Consider how the proposals will impact on our wellbeing objectives, our wellbeing goals, other objectives or those of other public bodies.

A formal statutory consultation for the proposed expansion at Bassaleg School will be carried out and supported at each stage by a FEIA to consider impact. This proposal supports the “A prosperous Wales”, “A more equal Wales” and “A Wales of cohesive communities” Well-being Goals and has no adverse effect on any of the other Well-being Goals.

- Collaboration: have you considered how acting in collaboration with any other person or any other part of our organisation could help meet our wellbeing objectives.

A formal statutory consultation will be carried out for the proposed Bassaleg School expansion with the opportunity for engagement with all stakeholders and supported at each stage by a FEIA to consider impact. The proposal will be delivered through full engagement with the governing bodies of the schools.

All construction projects will be delivered by Newport Norse and full consultation will be undertaken with statutory stakeholders during the planning process,

- Involvement: The importance of involving people with an interest in achieving the wellbeing goals, and ensuring that those people reflect the diversity of the City we serve.

A formal school reorganisation proposal will be undertaken and supported at each stage by a FEIA that will consider impact. This proposal will include a period of formal consultation that will offer the opportunity for engagement with all stakeholders and will include a series of drop-in events where people can find out more information about the proposal and how it may affect them. Following conclusion of the formal consultation, a Consultation Report will be prepared, published and distributed to all identified stakeholders.

Pupil voice is a high priority for Education so pupils at Bassaleg School will be consulted through the project to increase the sense of ownership for the project and consider pupils view when delivering the final project. A post project pupil workshop will also be completed to assess how the project delivered against pupils aspirations.

Crime and Disorder Act 1998

Section 17(1) of the Crime and Disorder Act 1998 imposes a duty on the Local Authority to exercise its various functions with due regard to the likely effect of the exercise of those functions on, and the need to do all that it reasonably can to prevent, crime and disorder in its area.

Consultation

None at this stage but this will be facilitated with key stakeholders as part of the school reorganisation proposal for Bassaleg School.

Background Papers

FEIA (attached)

Dated: 16 April 2020