LONDON BOROUGH OF CAMDEN

WARDS: All

REPORT TITLE

Themed Debate considering "Care Experience" as a locally protected characteristic

REPORT OF

Cabinet Member for Voluntary Sector, Equalities and Cohesion

Cabinet Member for Best Start for Children and Families

FOR SUBMISSION TO

DATE 29th January 2024

Council

STRATEGIC CONTEXT

Camden is one of the most diverse places in the country and communities of people with different identities, pride, cultures, and abilities that are part of the neighbourhoods in London. 'We Make Camden' sets out the ways we bring communities together to tackle social inequality and bring about real social change.

The Equality Act 2010 is the legal framework designed to protect the right of equal opportunity and unlawful discrimination, harassment and victimisation based on someone's personal and protected characteristics, including race and ethnicity, pregnancy and maternity, age, disability, sexual orientation, gender reassignment, gender, faith or non-faith, marriage, and civil partnership.

The Act does not include 'care experience' as a protected characteristic.

SUMMARY OF REPORT

This report provides a comprehensive background to Full Council on the current support provisions for our care-experienced residents in Camden alongside current thinking on ensuring that Care Experience is treated as to a locally protected characteristic. It also reflects on the role of the Council as corporate parents to the children and care leavers in the borough whilst also seeking to influence national policy in addressing the need for social mobility to be included in the revisions ongoing of the Equality Act 2010.

The report forms the background to a themed debate at the Full Council meeting in January 2024.

Local Government Act 1972 – Access to Information

No documents that require listing have been used in the preparation of this report.

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RECOMMENDATIONS

The Council is asked to note the report.

Signed:

N. Shah

Councillor Nadia Shah, Cabinet Member for Voluntary Sector, Equalities and Cohesion

Councillor Marcus Boyland, Cabinet Member for Best Start for Children and Families

Date: 17th January 2024

1. Background and definitions

- 1.1. The terms 'care leavers' and 'care experienced young people' are used interchangeably within this paper. In recent years, the care-experienced community have preferred the latter term. Although the term 'care leavers' is entrenched in law and statute, Camden have chosen to be more intentional with our use of language and thereby the Care Leavers service is now named the Care Experienced service.
- 1.2. The definition of 'care experience' has not been universally agreed and can vary nationally. As part of this report, 'care experienced' will apply to young people who have been 'looked after' at some point in their childhood and are entitled to receive services under the Children Act 1989, Leaving Care Act 2000 and the Children and Social Work Act 2017. As such, it does not include children who have been adopted as their support and services are covered under the Adoption Act 2000. However, we also recognise that 'care experience' can be interpreted as a lifelong characteristic which goes further than the definition of 'care leaver' attached to the statutory duty of supporting young people leaving care between 18-25.

2. <u>Our strategic commitments as a Corporate Parent for Camden Care</u> Experienced young people

- 2.1. As well as outstanding children's services for care-leavers, we have a range of borough-wide strategic commitments to supporting our children in care and, those who have experience of the care system to thrive. 'We Make Camden' is our refreshed partnership vision for the future of Camden it sets out what we want to collectively achieve and lead together across the borough and partners to tackle the injustice in Camden's communities. 'We Make Camden' outlines 6 ambitions, all of which are relevant to care leavers:
 - Camden is a borough where every child has the best start in life.
 - Camden's local economy should be strong, sustainable, and inclusive everyone should have a secure livelihood to support them to live a prosperous life.
 - Camden actively tackles injustice and inequality, creating safe, strong, and open communities where everyone can contribute.
 - Camden communities support good health, wellbeing, and connection for everyone so that they can start well, live well and age well.
 - Everyone in Camden should have a place they call home.
 - Camden should be a green, clean, vibrant, accessible, and sustainable place with everyone empowered to contribute to tackling the climate emergency.

- 2.2. To achieve these 6 ambitions, 'We Make Camden' sets out 4 missions. These missions are the long-term goals for the future of the borough that were developed in collaboration with people across Camden. One of our missions is focused on young people and outlines our vision that by 2025, every young person has access to economic opportunity that enables them to be safe and secure. Within our Youth Mission, care-experienced are one of our priority cohorts. We want to ensure that those with experience of care have access to Camden's huge opportunities, with sector-leading public services, a rich community of youth activities and exciting global and local employers. A key focus of the Diversity Mission is to create the conditions necessary to deliver leadership opportunities for future generations of Camden's young people.
- 2.3. The Director of Children's Services, the Lead Member for Children's Services and the Council have a statutory responsibility to act as effective and caring corporate parents for all Children Looked After and Care Experienced Young People. Simply put, the term 'corporate parent' refers the collective responsibility of all elected members, staff, and partner agencies to provide the best possible support and safeguarding for this cohort and to support their transition into adulthood. This involves an absolute commitment that our children should achieve in education, they live in stable homes where they receive love and care and are ready for independence as they mature into adulthood.
- 2.4. Camden's Corporate Parenting Strategy 2021-2024 sets out our vision to ensure that our children and young people have the best opportunities in life regardless of whether they live in Camden or outside the borough.

The strategy is underpinned by our Camden promise, a list of commitments developed by young people and children's services decision makers to ensure that all our children in care and care experienced young adults get the right services and support.

'We promise that Camden's children and young people will get access to all the services they need. They will have a stable home life and good relationships with carers, family, and friends. We will make sure that they:

- Are fit and healthy.
- Stay safe from harm.
- Have a good education and enjoy life.
- Can have their views heard and make a difference.
- Are ready for independence.
- 2.5. The Camden Promise makes the following pledges specifically for care leavers:
 - They are well-supported by their professional network, including their personal advisor, their housing pathway key worker and any other professional working with them.

- There is always someone available that they can contact for help in an emergency.
- They have a safe, stable and suitable place to live and that they have an opportunity to learn the practical skills they need for independent living.
- They can take up education, training and employment opportunities and become financially independent.
- They know how to get advice about local services so they can access suitable support from a wide range of agencies.
- There is a contingency plan in place so that if things don't work out you can get back on track quickly.
- 2.6. The strategy embodies our aims as a corporate parent to be a borough where 'every child looked after by Camden has a sense of belonging and is supported to make the most of their lives.'

This is underpinned by 5 priorities:

I. Race and Identity

'Our children, young people and care leavers will feel confident and assured in who they are, have their voices heard and be empowered to make a difference'.

II. Mental and Physical Health and Wellbeing

We will educate our young people to encourage a happy and healthy lifestyle, making sure that professionals work together to ensure that all their health needs are met.

III. Education and Employment

We will champion our young people and help them succeed in education and training, supporting lifelong learning and the pursuit of their interests.

IV. Safety and Permanency

All our children and young people will be safe from harm, with stability provided through secure placements and excellent carers.

V. Independence

Our young people will be prepared for the world of work and supported to become active citizens when they leave care. They will be prepared for independence in the best way possible.

3. Our children looked after and care leavers in Camden

- 3.1. At the end of March 2023 there were 197 children in our care. This is broadly consistent with the previous year (191) and equates to a rate 54.0 children looked after per 10,000 children aged under-18 living in Camden. The rate is almost unchanged since March 2022 (52.3) and continues to be below the rate for statistical neighbours and nationally.
- 3.2. On 31/03/2023 there were 361 care leavers allocated to the service. The age profile of our care leavers evidence that a high proportion of care leavers continue to be allocated in the service beyond their 21st birthday. 43% of our total care leaver population were aged 21 years or over. Almost 50% were previously Unaccompanied Asylum-seeking children.
- 3.3. Camden is performing well in terms of maintaining a relationship with care leavers as the corporate parent. During 2022/2023, 96% of 17 and 18 year olds and 92% of 19-21 year old Camden care leavers were 'in touch' with the council, which is in line with other London boroughs and statistical neighbours. Over the same period, 81% of 22-year-old Camden care leavers were 'in touch' which is much higher that national (51%), inner London (69%) and statistical neighbour (54%) averages in the same period. We see the same trend for 23-25 years old care leavers. This reflects the extended support provided to Camden care leavers, as the service is still provided after 21 if a young person still wants support.
- 3.4. 87.5% of 19–21 year-old Camden care leavers were in suitable accommodation during 2022/23, this is in line with national (88%), inner London (89%) and statistical neighbour (87%) averages in the same period.¹
- 3.5. 4.8% of 19–21 year-old Camden care leavers were in higher education during 2022/23, this is lower than national (7%) and inner London (9%) averages in the same period, but in line with statistical neighbour average (5%).
- 3.6. 70.5% of 19–21 year-old Camden care leavers were Education, Training and Employment during 2022/23, which compares favourably with national (56%), inner London (64%) and statistical neighbour (60.5%) averages in the same period.²

4. Our offer for Camden Care Experienced Young People

4.1. Camden have a track record of offering outstanding services to our care leavers. Camden's last OFSTED inspection (2022) granted an 'outstanding' rating on the experiences and progress of children in care and care leavers:

¹ DfE methodology is based on all young people in the cohorts including those young people who the local authority is not in touch with – with those who the council are not in touch with are counted as not in suitable accommodation. Care-experienced young people in custody are also counted as being in unsuitable accommodation. For Camden, 83% of unstable accommodation cases in 2022/23 where the Council are in touch with the young person were classified as unsuitable due to being in custody.

² Again, DfE methodology for care leaver statistics is measured based on all young people, including those the council are not in touch with. This approach means those young people who are not in touch with the local authority are classified as NEET and may account for some of this high proportion.

"When children in Camden leave care, they are well supported by their personal advisers (PAs) in a service that is aspirational for them. There are a wide range of services available for care leavers to meet their needs. The care leavers service is rooted in relational practice, which means that PAs build warm professional relationships and show pride in young people's achievements. Care leavers report that their relationship with their PA inspires them to succeed."

- 4.2. Our Care Experienced Young people's service has managed to secure this rating thanks to a very well established and carefully designed local offer based on the needs of the cohort. This includes:
 - o Identifying a personal adviser early from the age of 16 to work alongside the allocated social worker, to ensure a smooth transition between the children looked after and care experience service. This means our personal advisers are familiar to the young person and can take an active role in pathway planning.
 - Maintaining contact with our care leavers, including after they turn 21 and up to 25 years old or more. Our PAs are tenacious in their work with young people and achieve good outcomes despite considerable challenges. PAs work with young people for extended periods of time and have routinely continued to support them up to the age of 25 and continue to maintain contact beyond.
 - Supporting young people to stay with their foster carers when relevant.
 - Effective support to young people into independent living, primarily through our Young Peoples Pathway. The Young People's Housing Pathway was acknowledged by OFSTED to offer a 'peerless' approach supporting young people toward independent living through a stepped progression as young people demonstrate their growing independence skills. Young people are supported to settle into their tenancies with a setting up grant and they are able to maintain their tenancies and not being evicted. Wherever possible, AQA qualifications are used as the means of assessment ensuring that they have acquired suitable skills before nomination.
 - A focus on providing mental health support. Care leavers benefit from a wide range of services to support their emotional health including through the multidisciplinary 'minding the gap' panel which identifies the most appropriate resource or service for young people. Furthermore, a specialist clinician, based at the Hive, has been recruited specifically to work with care leavers. They will offer a Dialectical Behaviour Therapy (DBT) group, a treatment for young people 16+ who would not ordinarily work with Child and Adolescent Mental Health Services (CAMHS). Finally, Personal Advisers have undertaken a training course led by CAMHS to further support them to better understand the emotional and mental health needs of care leavers.

- A comprehensive offer of support for care leavers going into higher education, including: a £3000 yearly grant (the £9000 paid for the duration of the 3-year degree course is inclusive of the £2000 government bursary), paid travel costs, paid lap-top and vacation accommodation or funds to secure this.
- Giving access to free/subsidised gym membership, for which care leavers gave very positive feedback on the impact of this on their physical and mental wellbeing.
- We have recently developed our offer for young people leaving custody to ensure that they have a few essential items such as receiving a haircut, a couple of tracksuits and trainers to ensure that they are able to make a fresh start. The planning and purchase of these items enables increased contact with the Personal Adviser who encourage and focus conversations on rehabilitation, and it is intended to help break the cycle of offending.
- 4.3. In addition to this, Camden have also adopted several progressive policies to mitigate against the disadvantage faced by care experienced young people, including recommendations of national best practice from the Josh Mac Alister review such as:
 - Exempting care leavers from Council Tax.
 - Care leavers receiving priority for social housing.
 - Care leavers being able to practice independent living with taster flats.
 - Camden in principle acting as a guarantor for care leavers, providing a deposit in private rented property and providing them with a setting up allowance.
- 4.4. Over the next year, the Camden Care Experienced Service will focus on enhancing support to key cohorts, namely care experienced young parents, care experienced young people leaving custody and finally Unaccompanied Asylum-Seeking Children, these groups have been identified as having specific needs.
- 4.5. Since September 2023, Camden has also been offering 6 internships ring-fenced for care leavers aged 16-24. The internships are 18 months long and paid at London Living wage, alongside a £3000 bursary to support with living costs. Each placement is based in a different division of the Council and will enable the participant to learn various skills as they rotate around different work areas within the service where they are based. Roles are entry-level and will be adapted according to the participants capabilities and support needs. Unlike an apprenticeship, interns will not be obliged to work towards a vocational qualification this is in recognition that many care leavers face other challenges, and a simpler model may be more sustainable during their first full-

- time employment experience. However, functional skills provision and employability training will be available.
- 4.6. The scheme aims to replicate the same work experience and professional networking opportunities that parents are often able to offer their children, thereby giving interns the confidence, career guidance, and work skills needed to raise their aspirations and progress onto an apprenticeship or a job. In partnership with the Camden Apprenticeships team, Camden's Children Looked After and the Care Experience services, Drive Forward Foundation is providing a package of support to facilitate placements.
- 4.7. Candidates will receive application support, while interns will receive ongoing pastoral support, a series of employment-focused training sessions, a professional mentor, and access to a free counselling service. Intern managers will be provided training to prepare for their recruits and regular support throughout the contract.
- 4.8. Camden young people who are looked after or care experienced are at the forefront of reviewing and redesigning our services and what is on offer. Regular children in care council (CICC) meetings give Looked After Children and care leavers the opportunity to discuss their experiences and receive support and advice. The Young Inspectors programme of inspections has been providing input to service planning and development in Camden for the past fourteen years. Every year, a team of Young Inspectors undertake research into the views of other service users and professionals about the services provided by partner agencies responsible for safeguarding children. These inspections directly influence our service provision.
- 4.9. From February 2024 we will also be developing a 'Care Experienced Panel', the group will be for young people 18+. This will be a safe space for young people to come together talk about any issues of concern, offer advice, and share their views and experience. Care experienced young people should be one of the main drivers to influence service delivery which will better meet their needs.
- 4.10. We aim for participants in the group to include a cross section of our young people so that the group is a true representation of Camden's care population. The group will meet monthly in person but if needed additional meetings would be arranged sometimes by Teams for ease of participation. Camden aim is to be guided by the group and work alongside them in facilitating co-production to developing bespoke services for Camden care experienced young people.
- 4.11. We need to keep placing the voice of our care experienced young people at the forefront of any decision making. We envisage that the Children in Care Council, Young Inspectors and the Care Experienced Panel would play a key role in defining what more can be done for our care experienced young people in Camden, to influence policy and practice beyond the Children Looked After and Care Experienced Service.

5. The national policy landscape on care experienced young people

- 5.1. According to Independent Review for Children's Social Care "Many care experienced people face discrimination, stigma, and prejudice in their day-to-day lives. Public perceptions of care experience centre on the idea that children are irredeemably damaged and that can lead to discrimination and assumptions being made." (188). This stigma and negative representation are widely represented in the media and popular culture (Capes, 2017), which is felt by care experienced adults themselves who have found these media stereotypes 'particularly pernicious' (Care Experienced Conference 2019 p.29).
- 5.2. This stigma can lead to differential treatment by professionals and in society at large. This has been evidenced in the field of education, where children and young people with experience of care have reported that their teachers treated them differently, which was 'characterised by sympathy, concern, and lower expectations in terms of behaviour and engagement' (Honey et al. 2011, Mannay et al. 2017). Care experienced young people have also voiced how they feel the public perceive them as 'criminals' and assume their behaviour is problematic (Channel 4 News, 2015; Ofsted, 2009; Become, 2017).
- 5.3. This stigma and stereotyping are widespread and the Care System itself contributes to its perpetuation. Young people whilst in care can be unnecessarily criminalised (Fitzpatrick, 2022; Howard League for Penal Reform, 2017). It has also been found that professionals assume a specific inability to parent and can make care experienced people go through unnecessary assessment (Care Review, 2022). The Care System itself might also put children and young people at a disadvantage because of specific provisions for children in care, such as being in unregulated educational provisions which could put them at an educational disadvantage (House of Commons, 2022).
- 5.4. We know that care experienced young people nationally can experience poor outcomes. It is important to both look at the available outcomes evidence, whilst noting that outcomes for care leavers are not uniform. 26% of the homeless population have spent time in care; 24% of the prison population in England have care experience, and 41% of 19–21-year-old care Experienced young people are not in education, employment or training (NEET) compared to 12% of all other young people in the same age group (Ministry for Housing, Communities & Local Government, 2020; Williams et al., 2012; Department for Education, 2021b. This demonstrates the importance of working with partners in the criminal justice system, housing, education, and employment colleagues if we want to make a change for care-experienced young people in Camden.
- 5.5. Research from the Nuffield Foundation and UCL has also outlined the lifelong health and wellbeing impacts of those who experience care. Their research found that adults who spent time in care as children between 1971 and 2001 were 70% more likely to die prematurely than those who did not. The extra risk of premature death rose for care leavers from 40% to 1971 to 360% in 2011. Additionally, adults who were in residential care as a child are between 3 or 4 times more likely to report their health as 'not good' compared with 'good'. These health inequalities demonstrate the importance of working with health

- partners on improving outcomes for care-experienced young people in Camden.
- 5.6. The Nuffield Foundation research outlines that Care leavers in England are over ten times more likely than their peers to be not in education, employment, or training (NEET) in their 21st year, often finding it hard to gain employment without formal support networks.
- 5.7. Care experienced young people also face specific disadvantage which means that some blanket policies can affect them in a specific way, which can sometimes lead to indirect discrimination. As an example, the homeless intentionality rule, which states that those who have deliberately done or failed to do something that causes the loss of accommodation may no longer be owed a homelessness duty by the local authority. This legislation is in place to avoid tenants and homeowners voluntarily leaving accommodation or being evicted due to anti-social or threatening behaviour and then being given priority for social housing. However, care experienced people often find themselves forced into poor quality or unstable accommodation with little support after leaving care at a young age. Young people in this situation should feel able to push for better accommodation without fear of falling foul of homelessness intentionality rules. This example shows that policies across partners need to be looked at with the specific impact that it can have on care experience young people in mind. The pan-London Care Leavers Compact aims to develop a core common offer in London to improve outcome for care leavers in 6 areas, including Housing and work to date has included discussions with Directors of Housing across London to agree a common approach.
- 5.8. The Independent Review of Children's Social Care, led by Josh McAllister and published in May 2022, outlines five missions to support children in care and care experienced people, which focus on improving outcomes around university attendance and employment, reducing health inequalities, ending homelessness of care experienced young people. Notably, it also puts a strong emphasis on the importance of relationships in improving outcomes, with the first Mission ambitioning that no young person should leave care without at least two relationships. The missions each contain a number of recommendations to follow in order to reach the objectives set out, with some being the remit of national government and others aimed at local government, businesses and the wider society.
- 5.9. The Care Review recognised the often-negative outcomes for people with care experience and recommended that the government make 'Care Experienced' a protected characteristic. This is on the basis that care experienced people experience stigma and discrimination which is similar in nature to other groups that have a legally protected characteristic under the Equality Act 2010. The Care Review acknowledges that some worry about the potential effect of this further stigmatising care experienced people. However, McAlister argues that making care experience a protected characteristic is essential to "provide greater authority to employers, businesses, public services and policy makers to put in place policies and programmes which promote better outcomes for care experienced people." (189); and that like other hidden characteristics, care

experienced people will still be able to choose whether to disclose this part of their lived experience.

5.10. As of 11th October 2023, the number of councils adopting the policy has risen to 63 after a concerted campaign by Terry Galloway of Care Leaver Offer and other organisations involved in campaigning for the rights of those with care experience. Mr Galloway, who himself has experience of the care system and now is an active campaigner for the rights of care experienced young people, firmly advocates for making care experience a protected characteristic as he believes "Care experienced people can face significant barriers which impact them throughout their life, and despite the resilience of many care- experienced people, society too often does not take their needs into account."

6. <u>Equalities in Camden and the rationale for Care Experience as a locally protected characteristic</u>

- 6.1. Equalities has always been an integral part of both Camden's statutory duty but also that of a moral duty to our residents, businesses, and communities. As such the experience of those in the care system past and present is a hugely important part of Camden Council's ambition to ensure social mobility is interwoven in all agendas and outcomes for all in Camden.
- 6.2. As a way of improving social mobility and seeking to continue our ambitions of becoming a Borough of Sanctuary, Camden Council's Equalities service have updated our Equality Impact Assessments.
- 6.3. People in care or who have experience of care will have the same legal protection, at least locally, from discrimination as other characteristics under the Equality Act.
- 6.4. As part of ongoing work in the Equalities service, Camden will be further exploring better ways to capture data consistently to enable us to make better decisions based on richer quality of data going forwards. From a workforce perspective, Camden will be reviewing the capture of employee data to include Care experience and other socio-economic characteristics (where possible). This data can then be used to identify barriers and gaps in the future and can be part of future HR reports.
- 6.5. Camden will conduct a review of our benefits and support package to fit the needs of care experienced workforce. Furthermore, Camden will look to run internal career workshops specifically targeted at Care leavers/care experienced young people at work including CV and interview preparation.
- 6.6. The Cabinet Member for Voluntary Sector, Equalities and Cohesion will continue the role of lobbying for social mobility to be included in the revisions ongoing of the Equality Act 2010.

7. <u>Beyond the Equality Act: making Corporate Parenting 'everybody's</u> business'

- 7.1. In conclusion, care experienced people face challenges, discrimination and stigma across housing, health, education, relationships, and employment. This makes the case for treating care experience as a protected characteristic locally to raise awareness and ensure we develop policies and programmes that meets the need of our care experienced young people and adults.
- 7.2. We want to make sure that making care-experienced a locally protected characteristic is meaningful, and another stepping stone in our work to be an ambitious Corporate Parent. As well as adopting care experience as a locally protected characteristic, further work and an enhanced offer is planned for 2024. This will happen in parallel to the review and update of our Corporate Parenting strategy, which currently runs from 2021 to 2024.
- 7.3. In Camden, we want to make Corporate Parenting everybody's business, so that it is owned across all council services and beyond. This will mean expanding our partnership work with housing and health services, amongst others, and doing more work to make sure our care experienced young people can tap into our thriving academic and business communities.
- 7.4. We want to put our care experienced young people at the forefront of all future policy developments to make sure their views are heard. This will involve working with the young inspectors on all policy design and implementation.
- 7.5. We also want to think about what our lifelong offer for care experienced people could look like, with the acknowledgement that having experience of care can affect you later in life and not only as a young person and that Camden could raise its ambition to become a 'Corporate Parent for life'.
- 7.6. This work will be closely aligned with the any data emerging from Camden's Equality impact assessments and any financial saving proposals to ensure care leavers are being positively impacted. This will ensure any negative impacts are mitigated and addressed prior to actions and proposals being approved.
- 7.7. As part of this, an officer working group will be set up in 2024 across Council services to coordinate a multi-disciplinary approach to this ambition. The Council recognises the need for a culture shift in how protected characteristics are truly protected, recognised, and celebrated in our approach to service design and delivery. As part of this working group, we will also explore how best to work with our partners.

8. LEGAL IMPLICATIONS

- 8.1. Under the Children Act 1989, the local authority must provide support to care leavers. The proposal for the Council to recognise care experienced as a protected characteristic will create an enforceable right for those who have this characteristic.
- 8.2. Councillors must consider in coming to any decision the Council's equality duties. In summary these legal obligations require the Council, when exercising its functions, to have 'due regard' to the need to 1. Eliminate discrimination,

harassment and victimisation and other conduct prohibited under the Act; 2 to advance equality of opportunity between people who share a relevant protected characteristic and those who do not; 3. Foster good relations between people who share a relevant protected characteristic and those who do not (which involves tackling prejudice and promoting understanding). Under the Duty the relevant protected characteristics are: Age, Disability, Gender reassignment, Pregnancy and maternity, Race, Religion, Sex, Sexual orientation. In respect of the first aim only i.e. reducing discrimination, etc the protected characteristic of marriage and civil partnership is also relevant.

8.3. In this case the attached EQIA concludes that there is no potential for discrimination and all appropriate opportunities to advance equality and foster good relations have been taken.

9. RESOURCE IMPLICATIONS

8.1 The Executive Director for Corporate Services has been consulted and has no comments to add.

10. ENVIRONMENTAL IMPLICATIONS

9.1 Not applicable

REPORT ENDS