

HAMPSHIRE COUNTY COUNCIL

Decision Report

Decision Maker:	Executive Lead Member for Children's Services
Date:	8 June 2022
Title:	The Future of Hatherden Church of England (Aided) Primary School, Andover – End of Public Notice Report
Report From:	Director of Children's Services

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Purpose of this Report

1. The purpose of this report is to provide feedback on the statutory public notice period and obtain final approval for the proposed closure of Hatherden Church of England (Aided) Primary School, Andover.

Recommendations

2. That approval is given under the Education & Inclusion Act 2006, Schedule 2, part 2 paragraph 8 for the closure of Hatherden Church of England (Aided) Primary School with effect from 31 August 2022.

Executive Summary

3. The report entitled 'The Future of Hatherden Church of England (Aided) Primary School, Andover' was taken to Executive Lead Member of Children's Services on 23 March 2022 and approval given to publish Public Notices for the closure of the School.
4. On Friday 25 March 2022 a Public Notice on the future of Hatherden Church of England (Aided) Primary School was published and ran for six weeks until Friday 6 May 2022.
5. This report sets out the feedback received during the Public Notice period and recommends that the closure of the school be progressed.

Contextual Information

6. Hatherden Church of England (Aided) Primary School is a small rural school. Its performance, as rated by Ofsted, has been inconsistent. Over the past seven years it has been judged to be inadequate in two separate Ofsted judgements, the most recent being in July 2019.
7. In October 2014 Hatherden Church of England (Aided) Primary School was categorised 'Inadequate' by Ofsted. Although a subsequent inspection in September 2015 rated the school as Good', following a period of Local Authority (LA) support, the school has been unable to sustain this rating. It was last inspected in July 2019, when inspectors judged the school to be 'Inadequate'. The inspectors noted that safeguarding arrangements required urgent review and sharpening. In addition, inspectors noted that leaders needed to improve the leadership and management of the school, including governance, the quality of teaching and learning, and the progress made by pupils in writing and mathematics
8. The school has received Ofsted monitoring visits in February 2020, November 2020, January 2021 and May 2021. Following these visits, the school remains in a category of concern, despite improvements that have been noted. These improvements have relied heavily upon external support. It is highly unlikely that Ofsted will remove the category of concern until school leaders have the capacity for sustained self-improvement.
9. The school has benefitted from intensive, and largely funded, support from Hampshire Inspection and Advisory Service (HIAS) in order to improve the educational experiences and safeguarding of children in the school whilst the school's capacity is compromised. Further support has also been provided through the Diocese of Winchester and via the DfE funded school to school support through a local Teaching School.
10. Since the inspection in 2019, Ofsted have monitored the school four times. At each of the monitoring visits where Ofsted made a judgement, inspectors noted that leaders, and those responsible for governance, were taking effective action. Despite this, inspectors also noted that the impact of the extensive external support provided to the school, by the LA and the local teaching school, has been impeded by ongoing changes in the school's structure and leadership related to the fall in pupil numbers, as well as the challenges of the pandemic.
11. It is also the view of the Local Authority school improvement team that the changes in staffing related to falling numbers, and associated budget pressures, has had an adverse effect on leaders and teachers' collective capacity to improve the school at a sufficient pace, despite the considerable external support they receive. This is understandable, despite the very best endeavours of staff, since the many leadership and

management responsibilities and accountabilities of any school sit with only the interim acting headteacher and one other teacher.

12. A monitoring visit in May 2021 concluded that leaders and managers are taking effective action towards the removal of the “serious weakness” designation. However, it also explained that ‘leaders’ work to improve the curriculum remains ongoing. A number of factors have impeded the pace of this urgently needed work. Managing changes to the school’s structure and leadership led to some initial momentum being lost.’ It further comments, ‘The Local Authority and Diocese continue to invest heavily in supporting the school. By coordinating their work, this is enabling leaders to concentrate on a streamlined set of school-improvement priorities. Currently, local authority and diocesan support are focused on curriculum planning. This work is freeing up school leaders’ capacity to focus on other priorities and the day-to-day running of the school.’
13. In addition, were the school ever to be judged good, and no-longer in receipt of additional support, it would be challenging for a school of this size, with the related reduced leadership and teaching capacity, to respond to the commonplace challenges faced by schools on a regular basis, such as the recent review of the primary curriculum.
14. The school had 47 pupils on roll in the October 2020 census, but this has reduced over the last year to 33 pupils at the October 2021 census as parents continue to choose other schools. Four pupils joined in the Early Years reception age range this year so far against a Published Admission Number (PAN) of 16, (7 December 2021). Only five pupils are planning to join the school in September 2022 meaning that, again, the school will fall well short of the PAN.
15. Over time, budget reductions, driven by smaller pupil numbers, have led to a restructuring of the staff team. This has resulted in fewer staff, taking on a widening set of management responsibilities, which reduces the sustainable capacity for their impact without external support.
16. This presents leaders and governors with challenges to sustain the effectiveness of leadership and management in addition to the workload and wellbeing of individual staff. There are also implications for the age-related curriculum experience for children as a result of very small numbers in some year groups. The school has already lost pupils because parents have expressed a desire to attend a school with more children their own age. Despite what some have described as the benefits of a small school, this leaves those pupils who remain at Hatherden increasingly isolated from their peers in most age ranges.

17. The Education & Adoption Act 2016 places a duty on the Secretary of State to issue an academy order to all inadequate maintained schools and secure a sponsored academy solution for the school. The academy order was served on the school by the Regional Schools Commissioner (RSC) on 25 September 2019. Efforts to secure an academy sponsor with the appropriate experience and credentials required to effectively support the school have been ongoing. However, the low and declining pupil numbers and financial viability concerns have proved a major obstacle for those trusts who considered taking on the school.
18. Throughout the pandemic, officers in the RSC's office have met with the Local Authority on a weekly basis. Discussion of efforts to find a sponsor to take on Hatherden has been a very regular feature of these meetings. Following the initial consultation period, officers fed back to the RSC's office that there had been public disquiet that a sponsor had not been found. The RSC's office confirmed that they believed every possible sponsor had been approached but that the lack of a credible plan for sustained viability has prevented the RSC's office from securing a match.
19. Specific discussions have taken place with the RSC about the potential of federation with another local school, however, the RSC has determined that this is not an option acceptable to them as it is not in line with the policy of the Department for Education and the academy order must remain in place.
20. Discussions had been held with the RSC and officers of the Portsmouth and Winchester Dioceses about the future of the school and it was collectively agreed that a consultation process with regard to the closure of the school should be held. Both the Diocese and the RSC have been kept informed throughout the consultation period and their views on the recommendation within this report are attached at Appendix A.

Finance

21. Set out in the table below is the budgetary position for the school submitted by governors, up until the end of the financial year 2023/24.

Table 1 – School Budget Position

<i>Financial year</i>	<i>In Year +surplus / -deficit £</i>	<i>Cumulative position £</i>
<i>Balance from 2020/21</i>		<i>+88,222</i>
<i>2021/22</i>	<i>+45,227</i>	<i>+133,449</i>
<i>2022/23</i>	<i>+17,704</i>	<i>+151,153</i>
<i>2023/24</i>	<i>+14,642</i>	<i>+165,795</i>

22. The in-year surplus for 2021/22 is because the school received funding for 47 pupils as per the October 2020 census and the school has run fewer classes with the Headteacher teaching for part of the time.

23. The in-year surplus for 2022/23 and 2023/24 assumes the school will be funded for sufficient pupils for this scenario to unfold and the teaching costs are also assessed to reduce. The funding for 2022/23 is based on 33 children in attendance at the school at the October 2021 census and the funding for 2023/24 is based on estimated pupil numbers of 35 children. The school were assuming seven children would join the Early Years reception class in September 2022 however, the number is only five and the school has lost pupils across other year groups.
24. The school has not yet submitted a revised three year budget plan but given the numbers on roll that is highly likely to result in in-year losses and a subsequent reduction in the surplus balance held by the school over the medium term.

Consultation

25. The Statutory Public Notice period took place between Friday 25 March and Friday 6 May 2022 and a copy of the Public Notice is attached at Appendix 1.
26. The Notices were displayed at the school, circulated to stakeholders, and published in the Hampshire Independent and on Hampshire County Council's public notice portal: [Public notices | Hampshire County Council \(hants.gov.uk\)](https://www.hants.gov.uk/public-notices)

Responses Received

27. Eight responses were received during the Public Notice period – seven of these were from individuals and one on behalf of the Sambourne Trust.
28. Seven of the responses were objecting to the closure of Hatherden CE (aided) Primary School, with stated reasons including the following:
- a. Felt that March report was very negative and biased towards closure.
 - The March report sought to clearly set-out the facts around the many on-going issues and concerns being faced by the school and those organisations working with it.
 - b. Lack of alternative options other than closure – preference for requesting Ofsted inspection at later date to allow school to improve.
 - The County Council, Diocese, Regional Schools Commissioner and Department for Education have fully considered and explored all alternate options to closure. With County Council's and Diocese preferred option of federation not being acceptable to the DfE / RSC and no academy sponsor prepared to take on the school, closure has become the only acceptable solution. An Ofsted inspection would be required to evaluate sustainable leadership capacity before removing its category of concern, see comments above with regards to this.

- c. Noting the value of a local rural school.
 - The additional processes required to close a rural school are rightly highlighted within current DfE guidance. Any decision taken to close a rural school have been fully considered in relation to the impact it could have on its local community.

- d. Request to seek an academy sponsor again – not given sufficient time previously and timing was poor due to the pandemic.
 - Every effort has been made by the RSC / DfE, Diocese and County Council to secure an academy sponsor for the school. It is however the case that having undertaken due diligence, no sponsor has been prepared accept the risk to their capacity through Hatherden joining its existing Multi Academy Trust.

- e. Highlighting school budget not in deficit.
 - The school budget position while currently not in deficit must be considered in context with the detail set out in paragraph 21 to 25.

- f. Support of the local community and parents to keep the school open.
 - The drive from parents and the local community to support the school during these challenging times is very much welcomed. It cannot however be ignored that as a village school for some time now it has not been the school of choice for sufficient numbers of families to ensure viable and sustainable budgets and staffing structures.

- g. Not appropriate accommodation or equivalent facilities at other local primary schools to accommodate pupils from Hatherden CofE (aided) Primary School.
 - Capacity exists in other local schools in the area, should parents wish their children to attend them, and can provide all the required accommodation and facilities needed to deliver the very best educational opportunities.

- h. Consultation timing is unfair.
 - Timings around the consultation have had to be driven by the need to resolve the on-going challenges being faced by the school that show no signs of resolution in the short or long term. It would have not been acceptable to have allowed the situation to have continued beyond this academic year without a credible alternative.

- i. Statutory procedures regarding consultation with relevant parties not undertaken as stated in government guidance.

At all times the local authority has sought to follow all statutory guidance in relation to school closures and significant alterations in maintained schools.

- j. Local authority Hampshire Inspection and Advisory Services failed in their support of the school.

- Hampshire's Inspection and Advisory Service have supported the school intensively during periods of need for many years. This support has been added to by the diocese and a local teaching school. Ofsted has evaluated this support to be effective. Despite this support the challenges the school face have not been resolved in a way that is sustainable longer-term resulting in periods of success and decline in Ofsted ratings.
- k. Lack of consultation with The Sambourne Trust.

29. The letter from the Sambourne Trust stated their disappointment in not being contacted and involved in early discussions in regards the future of Hatherden CE Primary School and highlighted that 'as the owners of the site and buildings, we are anxious that the wishes of Mr James Sambourne, that a school should be held at Hatherden be continued, as they have been since 1725.'
30. Discussions with the Trust and diocese on the matter of ownership are now underway. It should also be noted that part of the site is in the freehold ownership of the County Council.
31. Ownership of the site and its potential future use while a matter of on-going discussion is not a material matter in the decision to close the school.
32. In addition to the above thirteen children from the school have written to the Cabinet Member for Children's Services, Education and Skills. These request that the Cabinet Member keep the school open.

Legal Implications

33. The Council has the power to make a proposal to close a maintained school under the Education and Improvement Act 2006. When formulating any closure proposals in relation to a rural primary school the council must have regard to:
 - a. The likely effect of the discontinuance of the school on the local community
 - b. The availability, and likely cost to the local authority, of transport to other schools,
 - c. Any increase in the use of motor vehicles which is likely to result from the discontinuance of the school, and the likely effects of any such increase, and
 - d. Any alternatives to the discontinuance of the school.
34. In addition, the Council is also required to have regard to the statutory guidance issued by the DfE when deciding whether a maintained school should close. The relevant statutory guidance is 'Opening and closing maintained schools' dated November 2019 and 'The making significant

changes (prescribed alterations) to maintained schools' dated October 2018.

35. The guidance states that the Council should be satisfied that there are sufficient surplus places elsewhere in the local area to accommodate the displaced pupils, and the likely supply and future demand for places in the medium and long term. The Council should also consider the overall quality of alternative places on the local area and the popularity of other local schools.
36. The guidance states that the Council should adopt a presumption against the closure of rural schools. However, this does not mean that a rural school will never close, but the case for closure should be strong and a proposal must be clearly in the best interests of educational provision in the area. When producing a proposal to close a rural primary school, the proposer must consider:
- *the likely effect of the closure of the school on the local community*; the closure of Hatherden Church of England (Aided) Primary School can be mitigated by the proposed relocation of pupils to Appleshaw, St Peters Primary School' if parents wish to have their children educated at the school rather than find a place elsewhere.
 - *the proportion of pupils attending the school from within the local community, i.e., is the school being used by the local community*; Hatherden Church of England (Aided) Primary School is not the school of choice as shown by the majority of its local community choosing other schools.
 - *educational standards at the school and the likely effect on standards at neighbouring schools*; Hatherden Church of England (Aided) Primary School was last inspected by Ofsted in July 2019. The school was graded as Inadequate. At the four monitoring visits undertaken by Ofsted since then the inspectors noted that leaders, and those responsible for governance were taking effective action towards the removal of the serious weaknesses designation and providing education in the current circumstances. Despite this, inspectors also noted that the impact of the extensive external support provided to the school, by the LA and the local teaching school, has been impeded by ongoing changes in the school's structure and leadership related to the fall in pupil numbers (with the school reducing to two classrooms), as well as the challenges of the pandemic. It is likely that, following the pattern seen before, when the LA reduces its support, the school will be unable to maintain the progress it has made to date. The Section 8 inspection in May 2021 concluded that leaders and managers are taking effective action towards the removal of the serious weaknesses designation. However, it also explained that 'leaders' work to improve the curriculum remains ongoing. A number of factors have impeded the pace of this urgently needed work. Managing changes to the school's structure and leadership led to some initial momentum being lost.' It further comments, 'The Local Authority and Diocese continue to invest heavily in supporting the school. By coordinating their work, this is enabling leaders to concentrate on a streamlined set of school-improvement

priorities. Currently, local authority and diocesan support are focused on curriculum planning. This work is freeing up school leaders' capacity to focus on other priorities and the day-to-day running of the school.' There is no reason to anticipate any detrimental effect on standards at other local schools should the decision be taken to close Hatherden.

- *the availability, and likely cost to the LA, of transport to other schools;* the closure of Hatherden Church of England (Aided) Primary School will incur some additional transport costs to provide Home to School Transport for children living in the catchment area of Hatherden Primary School. Each child's transport eligibility will be assessed; transport is provided if the journey to the new catchment school, Appleshaw, St. Peter's Primary School, is more than 2 miles for an 8-year-old child or and over the journey is more than 3 miles for children aged 8. Children living outside Hatherden's catchment area will also have their transport eligibility assessed, in line with the Home to School Transport policy, based on their home address and the school they attend.
- *whether the school is now surplus to requirements (e.g. because there are surplus places elsewhere in the local area which can accommodate displaced pupils, and there is no predicted demand for the school in the medium or long term);* there are sufficient surplus places in Appleshaw, St Peters Primary School to accommodate the displaced pupils Hatherden Church of England (Aided) Primary School now and also longer term.
- *any increase in the use of motor vehicles which is likely to result from the closure of the school, and the likely effects of any such increases;* currently some families travel to Hatherden for their educational needs. The closure of Hatherden Church of England (Aided) Primary School and the subsequent relocation of pupils to Appleshaw, St Peters Primary School will not necessarily increase the overall use of the motor vehicle for the school run as many parents already using cars will drive their children to Appleshaw instead of Hatherden or may no longer require the use of a car.
- *any alternatives to the closure of the school;* As the school has an academy order against it the only option is for the school to become an academy. As set out earlier in the report specific discussions have taken place with the RSC about the potential of federation with another local school, however, the RSC has determined that this is not an option, and the academy order must remain in place. The local authority believes the closure of Hatherden Church of England (Aided) Primary School provides the best opportunity to stabilise the educational offer in that part of the county.
- *transport implications i.e., the availability, and likely cost of transport to other schools and sustainability issues;* Hatherden catchment resident pupils will be entitled to local authority funded transport to their new catchment school, Appleshaw, St Peters Primary School, if Hatherden Church of England (Aided) Primary School closes. Children living outside the Hatherden catchment area will have their eligibility assessed in line with the Hampshire County Council Home to School Transport policy.
- *the size of the school and whether it puts the children at an educational disadvantage e.g., in terms of breadth of curriculum or resources available;* with a possible number on roll of 32 for the 2022/23 academic year the

school is likely to be able to run two classes, one for Key Stage 1 pupils and the other for Key Stage 2 pupils. Running one class across three (KS1) or four (KS2) years will impact on the breadth and accurate pitch of curriculum that can be offered at the school.

- *the overall and long-term impact on the local community of the closure of the village school and of the loss of the building as a community facility*; no decision has been made about the future of the Hatherden Church of England (Aided) Primary School site and it may be possible to make it available for the community.
- *wider school organisation and capacity of good schools in the area to accommodate displaced pupils*; pupil numbers in the area are forecast to fall over the next few years so it is anticipated that there will be places available at good schools in the area.

Personnel Implications

37. Early engagement has taken place with trade unions to provide reassurance and to ensure that they were aware of the Public Notice and decision timeline. Should the decision be taken to close the school, further consultation will take place with trade unions and staff affected and a bespoke version of the School Closure Procedure guidance already agreed with unions will be followed. Staff will be provided with support and guidance tailored to their individual situations.

Admissions

38. The number of pupils offered a place for Year R in September 2021 for Hatherden C of E (Aided) Primary School was 4 (against a PAN of 16) and for Appleshaw, St Peters Primary School was 9 (against a PAN of 15).
39. The number of on-time first preference applications for a place in Year R in September 2022 for Hatherden C of E (Aided) Primary School was 5 and for Appleshaw, St Peters Primary School was 8. On national offer day on 19 April 2022, five offers were made for Hatherden C of E (Aided) Primary School and 13 offers were made for Appleshaw St Peter's CE Primary School.
40. Children currently attending Hatherden Church of England (Aided) Primary School and those due to be on roll in September 2022, can be accommodated in Appleshaw, St Peters Primary School. Parents can express preferences for other school places at any time and those requests will be handled by the Schools Admission Team in line with published policies.

Transport

41. Subject to the outcome of the consultation any Home to School Transport issues arising will be managed in-line with the County Council's Home to School Transport policy.

Climate Change and Impact Assessment

42. Hampshire County Council utilises two decision-making tools to assess the carbon emissions and resilience impacts of its projects and decisions. These tools provide a clear, robust, and transparent way of assessing how projects, policies and initiatives contribute towards the County Council's climate change targets of being carbon neutral and resilient to the impacts of a 2°C temperature rise by 2050. This process ensures that climate change considerations are built into everything the Authority does.
43. The carbon mitigation tool and the climate change adaption tool were not applicable because this is a strategic report. The Climate Change Impact Assessment will be undertaken in conjunction with colleagues in Culture, Community and Business Services as individual projects are developed and brought to future Decision Days

Carbon Mitigation

44. Not relevant regarding the content of this report or decision being sought.

Conclusion

45. All efforts have been made to support Hatherden C of E (Aided) Primary by the County Council and its partners since it was rated by Ofsted as inadequate in July 2019 and an academy order was issued in September 2019.
46. Despite these efforts and in a continuing climate of low pupil numbers and, no desire from an academy sponsor to take the school on, the continuing challenges the school face cannot be allowed to continue beyond this academic year.
47. In considering the responses received through-out the consultation process and the inability to place the school on a long-term solid footing approval is sought to proceed with the closure of Hatherden Church of England (Aided) Primary School with effect from 31 August 2022.

Appendix 1



HATHERDEN CHURCH OF ENGLAND (AIDED) PRIMARY SCHOOL, HATHERDEN – DISCONTINUANCE

1. Notice is hereby given, in accordance with Section 15 of the Education and Inspections Act 2006 and the School Organisation (Opening and closing maintained schools) regulations 2019 that Hampshire County Council, Elizabeth II Court, Winchester, Hampshire, SO23 8UG intends to discontinue **HATHERDEN CHURCH OF ENGLAND (AIDED) PRIMARY SCHOOL**, Hatherden, Andover, SP11 0HT (category of school – Church of England Aided) with effect from 31 August 2022.
2. Hatherden Church of England (Aided) Primary School is a small rural Church of England school located in Andover, Test Valley. It provides education for children aged 4-11. The proposal is to close Hatherden Church of England (Aided) Primary School with effect from 31 August 2022.
3. The school is currently judged by Ofsted as Inadequate. As a result of this, the Regional Schools Commissioner (RSC) has served an academy order on the school. The RSC has been trying to secure an academy sponsor since the Academy Order was issued on 25 September 2019 but has been unsuccessful owing to the low number of pupils attending the school and the consequent long term financial and educational sustainability of the school. The closure of Hatherden Church of England (Aided) Primary School is therefore being proposed due to continuing challenges the school are facing. Places will be available for all pupils affected by the closure of Hatherden Church of England Primary (Aided) School (including those with special educational needs) at Appleshaw St Peter's Church of England (Aided) Primary School.
4. Transport will be provided for any pupils who qualify under the authority's published policy: <https://www.hants.gov.uk/educationandlearning/schooltransport>
5. This Notice is an extract from the complete proposal. Copies of the complete proposal may be obtained from Richard Vaughan, Deputy Head of Strategic Development, Children's Services Department, EII Court North, Winchester, Hampshire SO23 8UG; e-mail: strategicplanningunit@hants.gov.uk
6. Within six weeks from the date of publication of these proposals, any person may object or make comments on the proposal by sending them to Richard Vaughan, Deputy Head of Strategic Development, Children's Services Department, EII Court North, Winchester, Hampshire SO23 8UG; e-mail: strategicplanningunit@hants.gov.uk

Dated 25 March 2022

Carolyn Williamson
Chief Executive

REQUIRED CORPORATE AND LEGAL INFORMATION:

Links to the Strategic Plan

Hampshire maintains strong and sustainable economic growth and prosperity:	Yes
People in Hampshire live safe, healthy, and independent lives:	Yes
People in Hampshire enjoy a rich and diverse environment:	Yes
People in Hampshire enjoy being part of strong, inclusive communities:	Yes

Other Significant Links

Links to previous Member decisions:	
<u>Title</u>	<u>Date</u>
The Future of Hatherden Church of England Primary School	Nov 2021
The Future of Hatherden Church of England (Aided) Primary School	Mar 2022
Direct links to specific legislation or Government Directives	
<u>Title</u>	<u>Date</u>
None	

Section 100 D - Local Government Act 1972 - background documents	
<p>The following documents discuss facts or matters on which this report, or an important part of it, is based and have been relied upon to a material extent in the preparation of this report. (NB: the list excludes published works and any documents which disclose exempt or confidential information as defined in the Act.)</p>	
<u>Document</u>	<u>Location</u>

EQUALITIES IMPACT ASSESSMENT:

1. Equality Duty

The County Council has a duty under Section 149 of the Equality Act 2010 ('the Act') to have due regard in the exercise of its functions to the need to:

- Eliminate discrimination, harassment and victimisation and any other conduct prohibited by or under the Act with regard to the protected characteristics as set out in section 4 of the Act (age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex, and sexual orientation).
- Advance equality of opportunity between persons who share a relevant protected characteristic within section 149(7) of the Act (age, disability, gender reassignment, pregnancy and maternity, race, religion or belief, sex, and sexual orientation) and those who do not share it.
- Foster good relations between persons who share a relevant protected characteristic within section 149(7) of the Act (see above) and persons who do not share it.

Due regard in this context involves having due regard in particular to:

- The need to remove or minimise disadvantages suffered by persons sharing a relevant protected characteristic that are connected to that characteristic.
- Take steps to meet the needs of persons sharing a relevant protected characteristic that are different from the needs of persons who do not share it.
- Encourage persons sharing a relevant protected characteristic to participate in public life or in any other activity in which participation by such persons is disproportionately low.

2. Equalities Impact Assessment:

- (a) The recommendation in this report will have no impact on groups with protected characteristics.