

Amherst School (Academy) Trust
Single Equality Scheme 2017 - 2021

Part E: Appendices

Contents of our SES Appendices

- App 1. Description of Legal duties and definitions relating to each equality strand**
- App 2. Table of legislation – general and specific duties for schools**
- App 3. Links to other policies, procedures & practices**
- App 4. List of organisations and contact details**
- App 5. The SES process – organisation**
- App 6. SES Part B: Overview of outcomes – introduction, template and example**
- App 7. SES Part C: Impact Assessment – Introduction, templates and examples**
- App 8. SES Part D: Action Plans – Introduction, templates and examples**
- App 9. FAQ**

App 1. Description of Legal duties and definitions relating to each equality strand

There is an existing legal requirement for schools to have a Race Equality Action Plan, Disability Equality Scheme and Gender Equality Scheme. The school's SES meets the three equality requirements.

App 1.1 Gender (Sex)

Duties under the Equality Act 2010 require the governing body to:

- eliminate unlawful discrimination and harassment on the grounds of sex;
- promote equality of opportunity between women and men.

From 6 April 2010, the Equality Act 2010 requires the governing body to promote equality of opportunity between women and men (including boys and girls) and to publish a Gender Equality Scheme showing how the school intends to fulfil the general and specific duties. The Governing body must revise and review the plan every 3 years and report on progress annually.

Duties under the Sex Discrimination (Gender Reassignment) Regs 1999 and the Gender Recognition Act 2004 require the governing body to eliminate unlawful discrimination and promote equal opportunity in the employment of staff. There are no specific duties or requirements on schools.

App 1.2 Race (Ethnicity)

Duties under the Race Relations (Amendment) Act 2000 require the governing body to:

- eliminate unlawful discrimination;
- promote equality of opportunity;
- promote good relations between people of different racial groups.

To meet this requirement the governing carries out its duty through the SLT to:

- produce a written race equality policy identifying action to be taken to tackle discrimination and promote equality and good race relations across school activity;

- assess and monitor the impact of race equality policies on pupils, staff, and parents, in particular the attainment levels of pupils from different racial groups, and take such steps as are reasonably practical to publish the results of this monitoring annually;
- record racist incidents and report them to the local authority on a regular basis.

We use the online reporting form for any racial or bullying incidents that occur in the school. This information is also included on the Headteacher's Report to the FGB. We also complete a paper return form to the LEA. The reporting of racial incidents is a statutory requirement and completing the online survey throughout the year removes the need for the annual paper survey return:

<https://www.kent.gov.uk/af3/an/default.aspx/RenderForm/?F.Name=DdCBB4wy835>

App 1.3 Disability

Duties under Part 5A of the DDA 2005 require the governing body to:

- promote equality of opportunity for disabled people: pupils, staff, parents, carers and other people who use the school or may wish to; and
- prepare and publish a disability equality scheme to show how they will meet these duties.

Parts 2, 3 and 4 of the DDA 2005 apply to different aspects of the school's operation: to employment, to the provision of services and to education. The Disability Equality Duty brings together schools responsibilities under Parts 2, 3 and 4 and the school's scheme shows how the school is meeting its general duty to promote disability equality through:

- promoting equality of opportunity between disabled people and others;
- eliminating discrimination that is unlawful under the DDA;
- eliminating harassment related to disability;
- promoting positive attitudes towards disabled people;
- encouraging participation of disabled people in public life;
- taking steps to meet disabled people's needs, even if this requires more favourable treatment.

Duties in Part 4 of the DDA 1995 require the governing body to plan (The Schools Accessibility Plan) to increase access to education for disabled pupils in 3 ways:

- increasing the extent to which disabled pupils can participate in the school curriculum;

- improving the environment of the school to increase the extent to which disabled pupils can take advantage of education and associated services;
- improving the delivery to disabled pupils of information, which is provided in writing for pupils who are not disabled.

The governing body uses the Disability Discrimination Act 2005 definition of disability to respond to the different needs of disabled people.

Definition of disability

The DDA defines a disabled person as someone who has, '***A physical or mental impairment which has a substantial and long-term adverse effect on his or her ability to carry out normal day-to-day activities.***'

Definition of the terms:

- 'physical impairment' includes sensory impairments;
- 'mental impairment' includes learning difficulties and an impairment resulting from or consisting of a mental illness;
- 'substantial' means 'more than minor or trivial'; and
- 'long-term' is defined as 12 months or more.

The definition includes a wide range of impairments, including hidden impairments such as dyslexia, autism, speech and language impairments, Attention Deficit Hyperactivity Disorder (ADHD). These are all likely to amount to a disability, but only if the effect on the person's ability to carry out normal day-to-day activities is substantial and long-term, as defined above.

The effect on normal day-to-day activities is on one or more of the following:

- mobility
- manual dexterity
- physical co-ordination
- continence
- ability to lift, carry or otherwise move everyday objects
- speech, hearing or eyesight
- memory or ability to concentrate, learn or understand
- perception of risk of physical danger.

Some people are automatically covered by the definition: those with cancer, multiple sclerosis, HIV infection or a severe disfigurement. There are special provisions for people with progressive or recurring conditions.

App 1.4 Sexuality

Duties under the Equality Act 2006 require the governing body to eliminate unlawful discrimination and harassment on the grounds of sexual orientation.

The Employment Equality (Sexual Orientation) Regulations 2003 offered protection against discrimination on the grounds of sexual orientation in the workplace.

With the addition of powers introduced by the Equality Act 2006, it became unlawful (subject to certain exemptions) to discriminate on the grounds of sexual orientation in the following areas:

- The provision of goods, facilities and services
- The disposal and management of premises
- Education
- The exercise of public functions

App 1.5 Age

Duties under the Employment Equality (Age) Regulations 2006 apply to schools only as employers, with a duty to eliminate disadvantage, intimidation and victimization on the basis of age.

The Regulations prohibit age discrimination in terms of recruitment, promotion and training and:

- set a default retirement age of 65. Retirement ages below the default retirement age will need to be objectively justified or changed
- introduce a new right for employee to request working beyond retirement age and a duty on employers to consider that request
- introduce a new requirement on employers to give at least 6 months notice to employees about their intended retirement date
- allow pay and non-pay benefits to continue which depend on length of service requirements of 5 years or less or which recognise and reward loyalty and experience
- provide exemptions for many age-based rules in occupational pension schemes; and
- remove the upper age limit for unfair dismissal and redundancy rights, giving older workers the same rights to claim unfair dismissal or receive a redundancy payment as younger workers.

App 1.6 Religion or Belief

Duties under the Equality Act 2006 require the governing body to eliminate unlawful discrimination and harassment on the grounds of religion or belief.

Definition: 'Religion' or 'belief' means any religion, religious belief or similar philosophical belief (including agnosticism, atheism and humanism).

The Employment Equality Regulations 2003 offered protection against discrimination on the grounds of religion or belief in the workplace. With the addition of the powers granted by the Equality Act 2006, it became unlawful (subject to certain exemptions) to discriminate on the grounds of religion or belief in the following areas:

- The provision of goods, facilities and services
- The disposal and management of premises
- Education
- The exercise of public functions

App 2. Table of legislation – general and specific duties for schools

Equality strand	Legislation		General Duty	Specific duties
ALL	Human Rights Act (1998), Article 14: Rights ... <i>'without discrimination on any ground such as sex, race, colour, language, religion, political or other opinion, national or social origin, association with a national minority, property, birth or other status.'</i>			N/A
Gender (sex)	Equal Pay Act 1970 Sex Discrimination Act 1975, as amended Equality Act 2006 Sex Discrimination (Gender Reassignment) Regs 1999 Gender Recognition Act 2004		Eliminate discrimination Promote equality of opportunity	Gender equality scheme <ul style="list-style-type: none"> • Monitor implementation • Assess impact • 3 year review
Race (Ethnicity)	Race Relations Act 1976, as amended Race Relations (Amendment) Act 2000		Eliminate discrimination Promote equality of opportunity Promote good relations	Race equality policy <ul style="list-style-type: none"> • Monitor implementation • Assess impact • 3 year review Record incidents and report to LA
Disability	Disability Discrimination Act 1995, as amended Special Educational Needs and Disability Act 2001 Disability Discrimination Act 2005		Eliminate discrimination Promote equality of opportunity Eliminate harassment Promote positive attitudes Encourage participation More favourable treatment	Disability Equality Scheme <ul style="list-style-type: none"> • Monitor implementation • Assess impact • 3 year review • Report annually SEN policy & Accessibility Plan <ul style="list-style-type: none"> • Report annually
Sexual orientation	Employment Equality (Sexual Orientation) Regulations 2003, as amended Equality Act 2006, Sect 81	Employ - ment & provision of goods & services including Education	Eliminate discrimination on the basis of: <ul style="list-style-type: none"> • less favourable treatment • disadvantage • any other detriment – including harassment 	None
Religion or belief	Employment Equality (Religion or Belief) Regulations 2003, as amended Equality Act 2006		Eliminate discrimination on the basis of: <ul style="list-style-type: none"> • less favourable treatment • disadvantage • any other detriment – including harassment 	None
Age	Employment Equality (Age) Regulations 2006	Employ - ment only	Eliminate discrimination on the basis of: <ul style="list-style-type: none"> • less favourable treatment • disadvantage • victimization • instructions to discriminate • harassment 	None

App 3. Links to other policies, procedures & practices

Accessibility Plan: See school Accessibility Plan stored on the school network.

Anti-Bullying: See school Behaviour Policy stored on the school website and school network for Anti-Bullying.

Health and Safety: See school Health and Safety Policy stored on the school network.

Safeguarding Policy: See school Child Protection Policy on stored on the school website and school network.

SEN Policy: See school SEN Policy stored on the school website and school network.

App 4. List of organisations and contact details

Community cohesion guidance: www.teachernet.gov.uk/wholeschool/communitycohesion.

DCSF SES 2009-2010 Update : <http://www.dcsf.gov.uk/des/docs/SES%20UPDATE%202009-10.pdf>

DDA information: www.dotheduty.org

Equalities and Human Rights Commission: <http://www.equalityhumanrights.com/>

Government Equalities Office: <http://www.equalities.gov.uk/>

Inclusion and Achievement Advisers: http://www.kenttrustweb.org.uk/ask8/ask8_inclusion_contact.cfm *(will need changing following CFE reorganisation)*

Religion, spirituality, faiths and beliefs in Kent : http://www.kenttrustweb.org.uk/ask8/ask8_whole_school_psd.cfm

Kent customer equalities impact assessment:

http://www.clusterweb.org.uk/UserFiles/CW/File/Policy/Equalities/impact_assessment_tool.doc

Kent equalities information documents: http://www.kenttrustweb.org.uk/Policy/eq_keydocs.cfm

KCC Equality Strategy 2007 – 2010: <http://www.kent.gov.uk/publications/council-and-democracy/equality-strategy.htm>

Looked After Children and Young People: <http://www.teachernet.gov.uk/management/governors/lookedafterlearners/>
<http://www.dcsf.gov.uk/everychildmatters/resources-and-practice/ig00029/>

Ofsted Inspection documents relating to equalities:

<http://www.ofsted.gov.uk/Ofsted-home/Forms-and-guidance/Browse-all-by/Education-and-skills/Schools/Main-inspection-documents-for-inspectors>

Racial and bullying Incidents on-line reporting Form - direct

<https://www.kent.gov.uk/af3/an/default.aspx/RenderForm/?F.Name=DdCBB4wy835>

Racial and bullying incidents on-line reporting form – via kenttrustweb:

<http://kenttrustweb.org.uk/Finance-Assessment/datacollection.cfm>

School Guidance: www.teachernet.gov.uk/wholeschool/equality/

SES Part B: Overview of Outcomes

The school evaluated the attainment and progress of all vulnerable groups three times a year. This teacher assessed data is reported to the Curriculum Committee and FGB. Any concerns regarding poor progress of an individual group would lead to exploration of possible causes and impact on future strategies. The outcomes of the TA would also inform the working party to help analyse the effectiveness of the actions listed on the action plans. The Headteacher's report (3 times a year) also is a key document for recording and reporting incidents to the FGB such as exclusions, child protection referrals and racial incidents.

App 7.1 SES Part C: Impact Assessment – Introduction

Why do equality impact assessment?

- Allows us to give thought to the effect or potential effect of what we do on all members of our school community, including children, young people, parents/carers, our staff and others;
- Helps us to accomplish the task of promoting equality of opportunity for all and eliminating unlawful discrimination as we establish a school that is just and fair, where every child and adult matters;
- Helps us understand why there are different outcomes for various groups or individuals and to plan for change;
- Enables us to fulfil our legal duty.

Principles:

- No new policy or policy amendment is applied without having been impact assessed;
- Proportionality and Relevance – identifying and prioritising key PPPs;
- Ensuring effective participation through the work of the working party;
- Based on evidence – summary/professional judgement/team based at screening stage with more comprehensive evidence drawn into full impact assessment process;
- Managing the process in a planned yet responsive way;
- Using impact assessment to inform change and development in PPPs;
- The golden rule for engagement and manageability: **SCREEN EARLY, REVIEW LATER**

The process:

- We analyse information drawn together in the Overview of Outcomes to identify the PPPs relevant to the pattern of outcomes;
- All PPPs noted above are impact assessment screened enabling us to identify priorities for full impact assessment and actions
- The results of our impact assessments are recorded on the Impact Assessment Summary, and the information is used to inform our reporting.

App 7.2 SES Part C: Impact Assessment – Templates

Equality Impact Assessment Screening Record For (PPP screened) **EQUIA 1**

Information available	Information to get	Existing or potential POSITIVE impact Reference equality strands	Existing or likely ADVERSE impact Reference equality strands	Priority: (H,M L) Action Planned

--	--	--	--	--

Date completed:

Date agreed for review:

Lead Person:

Equality Impact Assessment Screening Summary

EQUIA 2

Ref	PPP	Information available or needed	Existing or potential POSITIVE impact Reference equality strands	Existing or likely ADVERSE impact Reference equality strands	Priority H,M,L	Action Planned & Target Date

Date completed:

Date agreed for review:

Lead Person:

Equality Impact Assessment Schedule

EQUIA 3

Ref	PPP	EQUIA Screening planned (date)	EQUIA Screening done (date)	Priority H,M,L	Full EQUIA planned	Full EQUIA done	Report

Date completed:

Date agreed for review:

Lead Person:

App 7.2

SES Part C: Impact Assessment – Examples

Equality Impact Assessment Screening Record For *Uniform policy* (PPP screened) **EQUIA 1**

Information available	Information to get	Existing or potential POSITIVE impact Reference equality strands	Existing or likely ADVERSE impact Reference equality strands	Priority: H Action Planned
<p><i>School policy docs – rigid uniform expectations. Practice of using detention to sanction.</i></p> <p><i>Parent survey data – most in favour of uniform. Some need financial support.</i></p> <p><i>Critical incident report re Sikh pupil MS wearing Kirpan. The MDS confiscated it. Parents understanding but have raised issue with governors.</i></p>	<p><i>Pupil survey data – we have not yet asked them and need to listen to pupil voice.</i></p> <p><i>Could School Council discuss – needs to be handled carefully</i></p> <p><i>Info on Sikh and other religious dress requirements</i></p> <p><i>Case law – what happened in Watkins-Singh (2008) case? Relevant to our</i></p>	<p><i>High relevance to Belief and or Race – promote valuing difference in religious expression through dress</i></p> <p><i>Recognition of some religious communities as racial groups (Jews, Sikhs in case law)</i></p> <p><i>Poverty not so evident with consistent uniform practice</i></p>	<p><i>Undifferentiated uniform policy not meeting needs of minority religious groups or ASD/ADHD pupils who have clothing sensitivities (possible DDA issue)</i></p> <p><i>Differentiation leading to overt identification and bullying?</i></p> <p><i>Possible gender inequality relating to girls’ winter clothing</i></p> <p><i>Transgender issues – can</i></p>	<p><i>Complex issues require full impact assessment.</i></p> <p><i>Undertake full impact assessment</i></p> <p><i>Date?</i></p> <p><i>Ensure uniform policy amended consequently</i></p> <p><i>Check with Governors</i></p> <p><i>Reference/amend action plan</i></p>

	<i>school uniform policy now?</i>		<i>we introduce a change that would avoid conflict on this?</i>	
--	-----------------------------------	--	---	--

Date Screened: 5th October 2009

Date agreed for Review: 12th April 2010

Lead Person: DHT

Equality Impact Assessment Screening Summary

EQUIA 2

Ref	PPP	Information available or needed	Existing or potential POSITIVE impact	Existing or likely ADVERSE impact	Priority H,M,L	Action Planned & Target Date
<i>U1</i>	<i>Uniform policy, procedures and practice</i>	<i>Policy docs Parent views Need: Pupil views Religious dress info Legal position</i>	<i>Belief Race Poverty</i>	<i>Disability Belief Gender & Transgender</i>	<i>H</i>	<i>Full EQUIA Further consultation Amend policy Report via Governors 12.04.2010</i>
<i>M3</i>	<i>Maths policy</i>	<i>Policy docs Work scrutiny Provision Map Performance data No more needed</i>	<i>All school's minority ethnic groups exceeding expectation and valued for attitudes. New EAL pupils enjoying comparative success.</i>	<i>No obvious equality issues. No vulnerable group underachieving No evidence of bullying or evidence of likelihood</i>	<i>L</i>	<i>Revisit following next year SATs July 2010</i>

Date completed: 5th October 2009 **Date agreed for review:** 12th April 2010 **Lead Person:** DHT
App 8.1 SES Part D: Action Plans – Introduction

Action planning principles:

- Action planning is done in accordance with the School’s values, priorities and aims as identified in **Part A:1** of our SES.
- Use of action planning as a tool for planning practical application of **levelling up** as described in **Part A:2.2** of the SES;
- Accurate knowledge of the school enables us to plan in a way that is **relevant and proportionate**;
- **Participation** of an appropriately selected working group is reflected in wider representation built into action plans;
- Through the impact assessment process, consideration is given to the **anticipation** of equality issues not presently evidenced but for which there is a potential;
- Action plans are seen as the starting point for action but not followed slavishly where monitoring and further impact assessments reveal alternative opportunities or needs;
- Managing the process in a planned yet responsive way;
- Action plans are checked against the objectives and the impact assessment that informed their selection;
- SMARTER target thinking means plans are **Specific, Measurable, Achievable, Relevant, Timed, Evaluated and Reviewed**;
- The golden rule for action planning is to **be SMARTER and get started**.

The process:

- Action planning is done in response to identified priorities arising from the analysis of all the information, including the Overview of Outcomes and the impact assessments we have undertaken.
- We plan for action over 1 and 3 years so that it is possible to implement change and development in a responsive yet systematic way.
- Action plans are reviewed annually and in the third year we undertake a review of the impact of our actions over three years.

- Initially many of our actions have been in relation to ensuring that we establish our SES effectively and embed the process of impact assessment itself.

App 8.2 SES Part D: Action Plans – Equality Action Plan

	Actions	Impact	Deadline	Lead officer	Indicator of achievement	Review
Priority outcome 1: Eliminate racial discrimination, promote equality of opportunity and good relations across different racial groups in school.						
1.	All new and existing policy, procedures and practices to undergo race equality impact assessment on pupils, staff and parents/carers, in particular the attainment levels of pupils from different racial groups.	<ul style="list-style-type: none"> To enable the school to address the needs of diverse and vulnerable groups at risk of disadvantage, promote good relations and cohesion between diverse communities, and set 	On going	Staff and Pupil Welfare and SLT	<p>All policies have equal opportunities at the heart of their ethos.</p> <p>Three times a year TA Steps data analysed to assess achievement of different ethnic groups.</p>	<p>Continue to monitor policies, procedures and practices for adverse race impact</p> <p>Regular analysis reports provided to the Governing Body including reports on racial incidents</p>

	Actions	Impact	Deadline	Lead officer	Indicator of achievement	Review
		priorities accordingly				
2.	Record racist incidents and to report them to the local authority on a regular basis.	To enable the school to tackle racially motivated incidents and bullying between diverse communities, and set priorities accordingly	On going	Headteacher responsible for collating racial incidents.	Incidents recorded, investigated in the schools and reported to the Authority	Continue to record, report and respond to racist incidents to encourage confidence of pupils and others in the robust nature of the reporting system. Regular reports provided to the Governing Body

Priority outcome 2: To create and embed own PSHE scheme of work that is based on our six school values. This scheme will promote all the different strands of the Single Equality Scheme.

1.	To create own PSHE scheme of work based on Amherst's six values.	Equality is promoted in every year group and is systematically taught. Also linked to weekly assemblies.	Scheme written by July 2017.	Trish Jones and Miranda Huntley.	New scheme is created and additional resources purchased.	
2.	New PSHE scheme to be delivered in each year group.	Every class teacher is responsible for delivering new scheme through a weekly PSHE	New scheme taught from Sept 2017.	Trish Jones and Miranda Huntley to monitor the implantation of the new scheme.	Weekly lesson is taught in every class.	

	Actions	Impact	Deadline	Lead officer	Indicator of achievement	Review
		lesson.				
3.	Staff training to be provided relating to the implementation of the new scheme.	Trish and Miranda to lead staff training on the new scheme and ensure staff are equipped and enthused to deliver the scheme.	Training by end of July 2017.	Trish Jones and Miranda Huntley.	Staff training completed by end of Term 6 2017.	
Priority outcome 3: Eliminate unlawful discrimination and harassment on the grounds of sex and promote equality of opportunity between women and men.						
4.	All new and existing policy, procedures and practices to undergo gender equality impact assessment on pupils, staff and parents, in particular the attainment levels of girls and boys.	To enable the school to address the needs of diverse boys and girls at risk of disadvantage. Use Steps data to analyse attainment and progress of boys and girls.	Ongoing	School Leadership team	PPPs reflect equal opportunities ethos.	Continue to monitor policies, procedures and practices for adverse gender impact
Priority Outcome 4: To ensure pupils' learning and well-being from a low social economic background is not restricted due to any social or financial barriers.						
10	To track pupil progress of pupils eligible for Pupil Premium and compare progress to pupils not eligible for Pupil	Efficient tracking of pupils using Assessment Manager to monitor if there is a discrepancy in achievement.	Ongoing	School Leadership Group.	Pupil tracking completed 3 times a year each term.	Ongoing

	Actions	Impact	Deadline	Lead officer	Indicator of achievement	Review
	Premium.	<p>Pupil Premium children make the same or better progress as others.</p> <p>Pupil Premium children receive weekly one to one support.</p> <p>Free music lessons and membership to clubs offered.</p>				

Date action agreed: May 2017

Date agreed for review: May 2018

App 9 Frequently Asked Questions (FAQs)

- 1. What is the legal requirement to do equality impact assessments?** Equality impact assessment is a legal requirement under gender, race and disability legislation in relation to employment and the provision of services including education.

2. **Have education services actually faced legal action over equalities?** Yes, there is some significant case law. Examples include rulings on admissions policy (M v Jewish Free School 2007), uniform Policy (Watkins-Singh v Aberdare Girls' High School, 2008) and impact assessment (Kaur and Shah v London Borough of Ealing, 2008).
3. **What is 'institutional discrimination'?** The Stephen Lawrence Inquiry report defined institutionalised racism as, *'the collective failure of an organisation to provide an appropriate and professional service to people because of their colour, culture and ethnic origin. It can be seen or detected in processes, attitudes and behaviour which amount to discrimination through unwitting prejudice, ignorance, thoughtlessness and racist stereotyping which disadvantage minority ethnic people.'*
4. **What is the difference between a policy and a scheme?** There is no difference that affects this SES.
5. **Do we still have to have an accessibility plan?** Yes, there are specific requirements in relation to accessibility.
6. **How can we manage the burden of paperwork associated with a SES?** The SES is theoretically one way of rationalising the requirements of a range of equality laws and, over time, will streamline the paperwork. At the development stage there is a lot of new work but the benefits will outweigh the costs if schools plan and develop their SES carefully and realistically.
7. **Can our equality action plans be done as part of other action plans within the school?** Yes, it is good practice to embed the processes relating to the SES within other school PPPs including development and action planning. There may still be a need to do discrete equality action planning where there is a need to take action on an equality issue for which there is no other related planning.
8. **Can we do a single equality action plan covering the various identified groups?** It is for the school to decide how to organise its processes and documentation. It is the outcomes for all members of the school community, and especially for pupils, that are the focus and great outcomes with little paperwork are to be preferred to poor outcomes and lots of paperwork. We all know that in order to be maximally effective, actions need to be well targeted. In order to plan a number of specific actions relating to the relevant range of identified equality issues in the school, it is likely that more than one overall plan will be needed.
9. **If the factors and fields included in the template Overview of Outcomes are not relevant to our school can we replace them with our own? Yes.** A good example of this is the comparison of attainment and progress data for different groups. The default factors in the Overview of Outcomes template are based on mainstream Primary and Secondary schools. Infant, Special schools and PRUs will need to identify factors that are relevant in for their own settings.