

CONFIDENTIAL

Kirklees College Corporation

QUALITY, PERFORMANCE & STANDARDS COMMITTEE
Minutes of a meeting held at 15.00 on 24 June 2019 at the Huddersfield Centre

Present:	Stephen Donnelly	Member
	Cristina George	Member (Chair)
	Marie Gilluley	Member (Executive)
	Gerard Hetherington	Member
	Nick Taylor	Member
	Andy Williams	Member

Attendance:	6/8 = 75%	KPI 80% Quorum: 3
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In attendance:	Ms J Arechiga	Assistant Principal (Study Programmes/Learner Services)
	Ms C Gonzalez-Eslava	Vice Principal (Curriculum, Performance & Innovation)
	Ms P Firth	Assistant Principal (Adults & Higher Education)
	Ms J Green	Clerk to the Corporation
	Mr S Harrison	Head of Faculty (Quality & Standards)
	Ms P Hughes	Assistant Principal (Quality/Apprenticeship Provision)
	Mr N Taylor	

Item	Action/ Report Item
PRELIMINARY ITEMS	
0	WELCOME AND INTRODUCTIONS
i	The Committee welcomed new Head of Faculty (Quality & Standards), Steve Harrison ("SH") and introductions were made. SH had recently joined the College team, having previously worked for Wakefield College, Calderdale College and private training providers.
ii	With the Chair's permission, SH tabled a short paper describing the new Student Progress Framework ("the Framework"). He said the Quality Team was keen to look at all elements of student progress, both in and out of the classroom, and to triangulate evidence to confirm that sufficient progress was being made by each student. In response to a question, he said the Framework would be ready for use in the next academic year.
iii	Due notice of the meeting having been given and a quorum being present, the chair declared the meeting open.
1	APOLOGIES FOR ABSENCE
i	Apologies were received from Committee Members Lydia Precious and Sue Weston.
2	DECLARATIONS OF INTEREST
i	Each Committee member confirmed that they had no direct or indirect interest in any way in the business to be transacted at the meeting, which they were required by the Instrument of Government to disclose, other than those matters that had previously been disclosed.

Item		Action/ Report Item
3 i	<p>APPROVAL OF MINUTES OF THE PREVIOUS MEETING</p> <p><u>RESOLVED:</u></p> <p>(i) To approve the minutes of 11 March 2019 as an accurate record.</p>	
4 i	<p>MATTERS ARISING NOT ON THE AGENDA</p> <p>It was noted that the actions from Items 36 (future Quality Improvement Plan updates to include summary comment on key areas of impact) and 41 (report on student attendance) would feature on the Agenda, primarily through the Quality Improvement Plan (“QIP”) update.</p>	
5 i ii iii iv v vi	<p>UPDATE ON AGREED ACTIONS</p> <p>There were no outstanding items from the previous meeting.</p> <p><u>Item 37 (report on recruitment initiatives)</u></p> <p>Vice Principal Carmen Gonzalez-Eslava (“CGE”) said significant work had been done but the project was not yet complete; the team was fully engaged in managing budgets around the curriculum plan and this would impact on the recommendations that could be made.</p> <p><u>Item 41 (attendance report)</u></p> <p>Members noted that the overall attendance figure reported in the QIP update (85% against a target of 90%) was in line with the position at the same point last year. While acknowledging that the value of attendance data diminishes as the year-end approaches, members queried whether they had sufficient data to fulfil their monitoring remit, having received no specific detail on maths and English attendance. The Committee asked that the relevant figures be provided to the Corporation alongside the QIP report.</p> <p>Action: The Vice Principal will provide attendance data, including for English and maths, to the Corporation alongside the Quality Improvement Plan update report.</p> <p>A member suggested that, going forwards, attendance might be looked at against the different delivery models across the College. There was agreement that it would be useful to draw a comparison next year, as part of the analysis of maths and English results.</p> <p>Action: Consider delivery models when reporting on attendance and performance of English and maths during 2019/20.</p>	<p>CGE</p> <p>CGE</p>
BUSINESS OF THE MEETING		
6 i	<p>REPORT OF THE QUALITY TASK GROUP, 11 JUNE</p> <p>CGE presented a report on the work of the Quality Task and Finish Group (“the Group”), saying over the course of four meetings between March and June 2019, it had covered several useful topics, taking an approach that the Senior Management Team (“SMT”) had described as ‘bold and refreshing’. She reminded the meeting of one of the key ‘takeaway action’ points that had come out of the sessions: the progression boards, saying they had already provided a stronger understanding of student performance, enabling staff to better support their progress.</p>	

Item		Action/ Report Item
ii	A Committee member who had involvement in the Group reflected that it had been a rewarding experience and had demonstrated the value of strong Governor challenge. The member commended management's hard work in implementing the action points from the Group's meetings and this was echoed by other members.	
iii	<p>In discussion, the Committee identified learning points that had come out of the project to date, being:</p> <ul style="list-style-type: none"> • a renewed appreciation of governance and the need to strike the right balance in terms of allocating time between monitoring compliance and performance and improving performance by contributing to strategy formulation and policy-making; • the need for a nuanced approach to establishing what 'good news' looks like, not simply celebrating 'ups' and lamenting 'dips'; • confidence that there is no 'secret ingredient'. Sharing of research findings and best practice had revealed that no one was doing anything dramatically different - and feedback was that the College's quality and outcomes approach was good. 	
iv	The minutes of 11 June were received and members noted the contents of the most recent discussion, which concerned progression data and information sharing.	
v	Corporation Report: The Committee received a report on the outputs and impact of the Quality Task and Finish Group established March 2019. The feedback from both the Senior Management Team and the Group itself was positive; it had shown itself to be impactful, with valuable initiatives flowing from its monthly discussions and positive feedback from academic staff, who welcomed the expert input and support.	Report Item 1
7	QUALITY IMPROVEMENT PLAN UPDATE	
i	CGE presented the QIP update, highlighting that the report Governors saw was supported by numerous action plans and monitoring activities. She said until the student outcomes were finalised in late October, a majority of the actions would be RAG rated "Amber" but the in-year data on retention and progress indicated that the College was making the expected progress towards the actions identified and an improvement on last year's actual achievement figures was expected.	
ii	<p>The target outcomes were discussed as follows:</p> <p><u>1. Further develop students' skills in English and mathematics and ensure more of them make good progress and achieve qualifications in these key subjects</u></p>	
iii	The Committee noted that schools stream learners according to ability and would not normally teach borderline C/D students alongside those predicted an F or G grade. There was discussion about the scope to apply this in the College context.	
iv	<p>A member drew attention to a table at the bottom of page 7 of the report. It showed that a relatively high proportion of learners had not completed initial assessments and progress points. Assistant Principal (Quality/Apprenticeship Provision) Pauline Hughes ("PH") said there were various reasons for this and the challenge was significant, as the College did not receive data from schools and GCSE results in isolation did not paint a full picture.</p> <p><u>2. Improve achievement in Diploma qualifications at both level 2 & 3 (including the NQF level 2 non regulated provision)</u></p>	
v	Members welcomed the progress in tackling underperforming courses. It was noted that some actions had been postponed until the following year.	

vi	<p><u>3. Continuing to set high expectations of students and staff to build on improving attendance and punctuality as a key employability skill particularly on Study Programmes and in English and mathematics</u></p> <p>Assistant Principal (Study Programmes/Learner Services) Julia Arechiga (“JA”) outlined work carried out in pursuit of the attendance, punctuality and attendance targets and said there was more to do in the area. Members noted that attendance was at 85% against a target of 90%, in line with last year. A member commented that the Committee would benefit from knowing which the ‘harder to improve’ areas were and this was agreed.</p>	
vii	<p>Some members were surprised to learn that individual learners had more than one attendance figure. CGE said other colleges took the same approach but as there was no national formula, the College could move to a different model if it chose to, perhaps applying weighting. She reminded members of the challenge of knowing what ‘good’ attendance looks like and said if the Quality Task Group was successful in persuading feeder schools to share disaggregated student attendance data, the College could potentially look at attendance in terms of progression, measuring the distance travelled from starting points.</p>	
viii	<p><u>4. Further improving the assessment methods to ensure that learners are supported and well prepared to be successful</u></p> <p>A member commented on the risk of being over-cautious in grade forecasting and said if the new progress framework was effective (and once it was fully embedded) the College could be quite precise in its predictions - and the results would indicate how effective the systems were.</p>	
ix	<p>A member asked whether staff had been overcautious in their approach in all areas, or only in respect of GCSE grade predictions. CGE said she felt staff had felt more confident on the Functional Skills side, as they are modularised qualifications rather than the linear GCSE. She said the processes were improving and this will translate to more realistic estimations.</p>	
x	<p><u>5. Improve the processes for the collection and reporting of data to ensure informed and timely actions can be taken across all levels of the organisation</u></p> <p>Members discussed the College dashboard, noting that it was expected to be complete early in the next academic year. CGE said it was partially in use already, with plans to roll it out as part of the performance management process.</p> <p><u>6. Improve the collection and analysis of students’ destinations in order to confirm the effectiveness of programmes and the impact of careers advice.</u></p>	
xi	<p>Assistant Principal (Adults & Higher Education) Philippa Firth (“PF”) said substantial progress had been made in this area. Although many of the RAG ratings remained amber, further work on capturing and analysing destination data would take place after the end of the academic year. PF emphasised the value of destination data in measuring how effective the College is at preparing students for their next stage of education, training or work and this was acknowledged.</p>	
xii	<p><u>7. Develop a leadership and management team to effectively deliver the college’s strategic objectives, develop high performance accountable teams and drive transformational change.</u></p> <p>Progress in this area was noted.</p>	

Item		Action/ Report Item
xiii	Members commented on the challenge of finding useful measures for the target outcomes. There was agreement that the complex interplay of factors precludes a simple analysis based on positive or negative outcomes, for example an assessment methodology might reliably indicate whether students are on track, but it would not translate to better outcomes unless tutors responded with a change of approach.	
xiv	Corporation Report: The Committee reviewed the Quality Improvement Plan (“QIP”), noting good progress against the target outcomes. Members emphasised the need for useful measures of progress, recognising that such things are rarely easy to define or identify. The Committee was asked to comment on the format and content of the QIP, and while members agreed it was a useful tool, they said it often left the ‘so what?’ question unanswered. A key message for management was that Governors understood that the aimed at outcomes were not ‘easy wins’ and acknowledged that longer-term thinking was needed, with medium-term objectives of putting new systems and processes in place, and at least twelve months’ allowance for monitoring and appraisal, with review dates spanning a year or more.	Report Item 2
8	<p data-bbox="252 734 1358 763">STUDENT PREDICTED ACHIEVEMENT</p> <p data-bbox="252 797 531 826"><u>Overall Achievement</u></p> <p data-bbox="124 860 1358 1028">i JA said overall predicted achievement was 85.89% (+5.76% for 16-18 and +3.91% for 19+), representing a 4.7% increase on 2017/18 and taking the College back to the 2016/17 position. It was noted that this was the predicted position at the time of writing and there were some assumptions that might not materialise and impact on the final figure.</p> <p data-bbox="252 1061 675 1090"><u>Vocational and English & Maths</u></p> <p data-bbox="124 1124 1358 1326">ii JA said the underperforming curriculum areas were predicting an increase on their vocational programmes but had flagged English and maths as areas of concern. The management view was that this was over-caution on the part of tutors, a relatively common feature, to be addressed as part of performance management. As part of this challenge, for example, Hair & beauty’s predictions had increased following a review; land-based had gone up slightly but not by as much.</p> <p data-bbox="252 1359 467 1388"><u>Vocational Only</u></p> <p data-bbox="124 1422 1358 1646">iii A member expressed concern about a performance dip in vocational engineering and asked what strategies were in place to address the issues. JA said they had included curriculum changes, creating a model similar to that of motor vehicle, with more options to meet the different needs of the students. She said the planned changes should positively impact on retention and student experience, creating a secure platform for September. For some current learners there would be the option of repeating the year.</p> <p data-bbox="252 1680 1054 1709"><u>Performance by Level, by Age Group and in Maths & English</u></p> <p data-bbox="124 1742 1358 1877">iv JA drew attention to the table on page 3 of her report which showed performance against National Achievement Rates. Level 2 was performing below national average, despite a slight predicted improvement on last year’s outcomes. JA said this was largely due to adult maths and English.</p> <p data-bbox="252 1910 408 1939"><u>Timescales</u></p> <p data-bbox="124 1973 1358 2076">v JA outlined the timetable for bringing the final predicted achievement data to the Corporation. She said there was a big caveat around English and maths but 85.89% was realistic based on the work that has been done to date.</p>	

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vi	<p><u>Retention</u></p> <p>This was at 91.77%, compared to 91.78% this time last year, when the outturn was 89.85%.</p>	
vii	<p><u>Apprenticeships</u></p> <p>PH said, based on calculations done learner by learner, apprenticeships outcomes were expected to be in line with last year for achievement: 68.78%, compared with 69% last year.</p>	
viii	<p>PH said key areas of concern were Engineering, Business (there having been several management changes within the apprenticeship provision), subcontracted provision, and Motor Vehicle and Fabrication (which operates out of the same Faculty as Engineering). She said while recent data seemed to show quite a steep decline, there was a lot of detail to work through and a lot of ongoing work was taking place to claim certification that would potentially improve the position. Governors were reminded that performance for apprenticeships is still well above national averages.</p>	
ix	<p>Corporation Report: The Committee learned that the R10 data supports the R9 prediction for overall achievement (85.89%); delivering this would take the College back to the 2016/17 position, which would be very positive. While most curriculum areas anticipate an improved position and Apprenticeships are on track to equal last year's results, vocational engineering will see a significant dip of over 20%. There was discussion about the reasons for this and management outlined its plans for recovery. Separately, management shared that there had been challenges around securing realistic (rather than over-cautious) predictions from some teaching staff, particularly in GCSE English and maths. This trend is thought to have deflated the predictions in some vocational areas, notably health & beauty and land-based. It will be something to address in the next performance review cycle and the Committee will monitor it. Very positively, the new quality initiatives have yielded more and better data and the Committee looks forward to comparing final outcomes with predictions, to see how much impact this has had.</p>	Report Item 3
9	HE UPDATE	
i	<p>PF spoke to her paper, explaining that it was a general update for the Committee on the Higher Education activity in the College.</p>	
ii	<p>The Committee noted that the Access and Participation Plan would be ready for submission by 30 June, as required. Members commended PF on completing it.</p>	
iii	<p>Members discussed the external examiner feedback, noting that there were no issues to report, other than the concerns raised by engineering HNC year one and year two students (regarding staffing, marked work not being returned in a timely manner and assessment plans not being followed) which had already been addressed. PF said the Programme Quality Lead had done some intervention work and more recent student feedback had been positive, much progress having been made over the past six weeks.</p>	
iv	<p>The Committee heard that the external examiner review of HNC/D Advanced Practice Early Years had been blocked due to an insufficiently sufficiently large sample of work for testing (it is necessary to see one whole completed unit). PF said a further visit would be arranged and the Programme Quality Leader and Head</p>	

Item		Action/ Report Item
v	<p>of Faculty would support the Award Leader in preparing for it. In response to a question, PF described it as a 'minor' risk, affecting only year one students.</p> <p>Corporation Report: There are no issues to report based on the HE external examiner feedback.</p> <p><u>HE Policy Update – agreed at last committee meeting.</u></p>	Report Item 4
vi	<p>PF's report referred to previous discussions about the potential to grow the Higher Education and Skills provision and outlined the management recommendations to achieve this, through partnership working, brand development and improved marketing, and curriculum changes, including expanding the range of Higher and Degree apprenticeships offered, especially around construction and engineering.</p>	
vii	<p>Corporation Report: A Higher Skills Strategy will be presented to the Corporation at its 12 July 2019 meeting.</p> <p><u>Programme Viability</u></p>	Report Item 5
viii	<p>PF said all faculty areas had until 29 June to confirm their numbers for 2019/20. She reminded the Committee that the minimum number to run a course was eight.</p>	
ix	<p>Finally, the Committee noted that the College's graduation ceremonies were scheduled take place at Dewsbury Town Hall on Thursday 11 July.</p>	
10	<p>EQUALITY, DIVERSITY & INCLUSION STRATEGIC GROUP, 18 JUNE</p> <p>i The minutes of the 18 June Equality, Diversity & Inclusion Strategic Group ("EDIS") were received. Members commented that they provided a useful perspective.</p> <p>ii Marie Gilluley, the Principal ("MG") recalled that, when the EDIS remit was last reviewed, the consensus reached was that it should not seek to duplicate the existing work underpinning quality improvement, but should focus on disseminating good practice, learning from other organisations and considering how external practices might be usefully applied in the College context. At the 18 June EDIS meeting, staff members from the Foundation Learning team had shared initiatives they had used to support student inclusion.</p> <p>iii The Committee was pleased to hear that there continued to be a high level of focus on mental health awareness, with counselling statistics showing that mental health and wellbeing remained a significant risk area. The new interventions around bullying were welcomed.</p> <p>iv MG fed back from a recent Gold meeting she attended that the other agencies had reacted with some concern to the news that the College was reviewing its admissions policy. She explained that the review was being undertaken in response to concerns raised by the Safeguarding Committee; the College has been carrying an increasingly complex burden of resource-intensive risk, which is impacting on the overall student experience.</p> <p>v Corporation Report: The Committee discussed the 18 June Equality, Diversity & Inclusion Strategic Group meeting minutes and has no concerns to share.</p>	Report Item 6
11	<p>COMMITTEE WORK SCHEDULE AND MEETING DATES 2019/20</p> <p>i There was discussion about dates for future Committee meetings and members</p>	

Item		Action/ Report Item
ii	<p>agreed that it would be difficult to get the end of year data ready and the Self-Assessment fully completed for a 26 November meeting. The suggestion was to arrange an additional meeting in December to look at Self-assessment and the QIP.</p> <p>Members discussed the management report, which proposed a new schedule of business, highlighting that the reporting cycle and content of the agendas for the Committee had not significantly changed in several years. Members took the opportunity to consult with management on how the Committee might better align its business cycle to the quality cycle and the key activities in the College, noting that this had also been a recommendation from the Quality Task Group.</p> <p>Following the discussion, it was agreed as follows:</p>	
iii	<p>Action: The Clerk and Vice Principal to produce an amended version of the Committee Work Schedule and meeting calendar, based on the Committee's discussions, for approval by the Committee chair before being recommended to the Corporation for adoption.</p>	<p>JG, CGE</p>
iv	<p>Corporation Report: The Committee chair, having delegated authority to act on behalf of the Committee, will agree an amended work schedule and calendar of meetings based on the Committee's discussions and management advice and will recommend it to the Corporation on 12 July.</p>	<p>Report Item 7</p>
12	<p>FINANCIAL RECOVERY: IMPACT ON QUALITY</p> <p>MG said the main area of concern continued to be Engineering, including Science, where skills shortages were having an impact, particularly as there had been a high incidence of staff turnover. She said while progress had been made in tackling a complicated set of issues and things were starting to feel more positive, it would take time to resolve things completely.</p>	
COMMITTEE SELF-ASSESSMENT		
13	<p>REVIEW OF PERFORMANCE 2018/19</p> <p>i With the Chair's consent, a draft performance report was circulated, based on a previous year's report. It had been updated with details of this year's membership, attendance (75% against a target of 80%) and the items covered at meetings compared with the work schedule.</p> <p>ii Members discussed the year's work and agreed as follows:</p> <ul style="list-style-type: none"> ➤ They were satisfied that the Committee had met its remit, receiving almost all reports on schedule as planned, the exceptions being appropriate amendments to the schedule. ➤ The format and content of reports was good. The strategic curation and rationalisation of information coming to the Committee was welcomed and recognised as a real skill. ➤ Attendance at meetings by senior leaders and middle managers had been appropriate and helpful; their contributions, as well as those of senior managers, had been excellent. Transparency was recognised as a key strength. ➤ The value of participating in working groups and other ancillary activities was recognised, with members observing that those opportunities offered new perspectives on the student experience. 	

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iii	<ul style="list-style-type: none"> ➤ The Committee's end of year report should explain the proposed changes to its work schedule, its priorities, and its terms of reference, and the rationale for those. ➤ The Committee had given a greater degree of challenge this year and was viewed by management as a 'critical friend'. This was evidenced by management feedback and the changes proposed to working practices, information flows and work schedules. ➤ The Quality Task Group initiative had been impactful and the learning points arising from it had had a positive impact on the Committee's own performance. ➤ The Committee would look at the possibility of adopting indicators for its own performance next academic year. <p>Action: The Clerk to amend the draft report to reflect the Committee's discussion and send it to members for feedback within a week; it will be presented at the Search & Governance Committee in the Autumn term and will feed into the Governance self-assessment exercise, at which point the Corporation will look at indicators of impact.</p>	JG, Members
14 i	<p>TERMS OF REFERENCE</p> <p>Corporation Report: The Committee recommends changes to its Terms of Reference, as per the redline draft which accompanies these minutes. The only material amendment proposed is to clarify that the Committee has an active oversight role in relation to Equality, Diversity & Inclusion, rather than an entirely passive role, reflecting the fact that the Corporation is responsible for:</p> <ul style="list-style-type: none"> • ensuring that the College complies with its legislative duties, including the General and Specific duties set out in the Equality Act 2010; and • ensuring that adequate strategies and systems are in place to implement the Public Sector Equality Duty. 	Report Item 8
MATTERS TO NOTE AND ADMINISTRATION		
15 i	<p>DATE OF NEXT MEETING</p> <p>Provisionally, Monday, 14 October November 2019, 15.00</p>	
16 i	<p>PUBLICATION OF AGENDA PAPERS</p> <p><u>RESOLVED:</u></p> <p>(i) The Committee's previous minutes, along with those of the Quality Task Group and the Equality, Diversity & Inclusion Strategic Group, should be made available for publication; so should the proposed changes to the Committee Terms of Reference. All other papers to remain confidential, subject to review, on the basis that (as per clause 17(2)(d) of the Instrument of Government, they are deemed by the Committee to be matters which, by reason of their nature, should be dealt with on a confidential basis.</p>	
0 i	<p>THANKS AND CLOSE</p> <p>The Chair thanked everyone for their contributions and the meeting closed at 17.30.</p>	

Items of Report for Corporation

#	Details	Minute
1.	The Committee received a report on the outputs and impact of the Quality Task and Finish Group established March 2019. The feedback from both the Senior Management Team and the Group itself was positive; it had shown itself to be impactful, with valuable initiatives flowing from its monthly discussions and positive feedback from academic staff, who welcomed the expert input and support.	6(v)
2.	The Committee reviewed the Quality Improvement Plan (“QIP”), noting good progress against the target outcomes. Members emphasised the need for useful measures of progress, recognising that such things are rarely easy to define or identify. The Committee was asked to comment on the format and content of the QIP, and while members agreed it was a useful tool, they said it often left the ‘so what?’ question unanswered. A key message for management was that Governors understood that the aimed at outcomes were not ‘easy wins’ and acknowledged that longer-term thinking was needed, with medium-term objectives of putting new systems and processes in place, and at least twelve months’ allowance for monitoring and appraisal, with review dates spanning a year or more.	7(xiv)
3.	The Committee learned that the R10 data supports the R9 prediction for overall achievement (85.89%); delivering this would take the College back to the 2016/17 position, which would be very positive. While most curriculum areas anticipate an improved position and Apprenticeships are on track to equal last year’s results, vocational engineering will see a significant dip of over 20%. There was discussion about the reasons for this and management outlined its plans for recovery. Separately, management shared that there had been challenges around securing realistic (rather than over-cautious) predictions from some teaching staff, particularly in GCSE English and maths. This trend is thought to have deflated the predictions in some vocational areas, notably health & beauty and land-based. It will be something to address in the next performance review cycle and the Committee will monitor it. Very positively, the new quality initiatives have yielded more and better data and the Committee looks forward to comparing final outcomes with predictions, to see how much impact this has had.	8(ix)
4.	There are no issues to report based on the HE external examiner feedback.	9(v)
5.	A Higher Skills Strategy will be presented to the Corporation at its 12 July 2019 meeting.	9(vii)
6.	The Committee discussed the 18 June Equality, Diversity & Inclusion Strategic Group meeting minutes and has no concerns to share.	10(v)
7.	The Committee chair, having delegated authority to act on behalf of the Committee, will agree an amended work schedule and calendar of meetings based on the Committee’s discussions and management advice and will recommend it to the Corporation on 12 July.	11(iv)
8.	The Committee recommends changes to its Terms of Reference, as per the redline draft which accompanies these minutes. The only material amendment proposed is to clarify that the Committee has an active oversight role in relation to Equality, Diversity & Inclusion, rather than an entirely passive role, reflecting the fact that the Corporation is responsible for: <ul style="list-style-type: none"> • ensuring that the College complies with its legislative duties, including the General and Specific duties set out in the Equality Act 2010; and • ensuring that adequate strategies and systems are in place to implement the Public Sector Equality Duty. 	14(i)