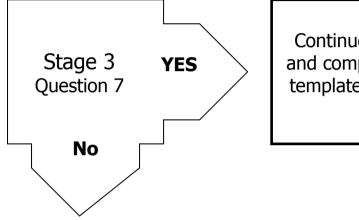
Equality Impact Assessment Template

The Council has revised and simplified its Equality Impact Assessment process. There is now just one Template. Project Managers will need to complete **Stages 1-3** to determine whether a full EqIA is required and the need to complete the whole template.

Complete Stages 1-3 for all project proposals, new policy, policy review, service review, deletion of service, restructure etc



Continue with Stage 4 and complete the whole template for a full EqIA

Go to Stage 6 and complete the rest of the template

Equality Impact Assessment (EqIA) Template

In order to carry out this assessment, it is important that you have completed the EqIA E-learning Module and read the Corporate Guidelines on EqIAs. Please refer to these to assist you in completing this assessment.

It will also help you to look at the EqIA Template with Guidance Notes to assist you in completing the EqIA.

Type of Proj	ject / Proposal:	Tick	Type of Deci	sion:	Tick		
Transformation	on	Cabinet					
Capital			Portfolio Holde	er			
Service Plan			Corporate Stra	ategic Board			
Other			Other				
			t expansion of t I Primary Schoo	he following community school:			
		Arundel Dr	•	,			
		Harrow, H	_				
Title of Project	ct:	,	_				
			Cabinet is recommended to approve the statutory proposals to create 12 additional special educational need places at the school from September 2015 in addition to the published admission number.				
Directorate / S	Service responsible:	Children & Families					
Name and job	title of lead officer:	Johanna Morgan, Education Professional Lead, School Organisation					
Name & conta assessment:	act details of the other persons involved in the	Carole Wells, Service Manager, SEN Assessment and Review Service Chris Melly, Senior Professional, School Organisation Emma Billington, Headteacher of Earlsmead Primary School					
Date of asses	sment:	14 May 2014					
Stage 1: Ov	verview						
1. What are y	osals e.g. introduction of a new service or review, changing criteria, reduction / removal	The proposal is to establish new special educational need provision by creating an additional 12 places at the school. These places are in addition to the published admission number of 60 places per year group and 420 in total. Total pupil					

of service, restructure, deletion of posts etc)	numbers at the school would increase from the current 420 pupil places to 432 pupil places. There would be a resource provided at the school to meet the special educational needs of the additional pupils. The primary need of the children with statements of special educational need is planned to be moderate learning difficulty, or moderate learning difficulty with autistic spectrum disorder.					
	Education school expansion statutory processes are being undertaken. On March 2014, the Portfolio Holder for Children and Schools decided to publis statutory proposals to effect the expansion. The statutory proposals are pul from 23 April to 21 May 2014. At the date of writing this EqIA, no comments objections have been received during the representation period. In June 20 Harrow Cabinet will determine the statutory proposals.					
The proposed permanent expansion of Earlsmead Primary the Special School SEN Placements Planning Framework a July 2013. The Special School SEN Placements Planning Framework for bringing forward proposals over the next 3-to capacity to meet the rising demand for provision for children with special educational needs.				net in des a ase		
	Residents / Service Users	Partners / Schools	Stakeholders			
	Staff	Age	Disability			
2. Who are the main people / Protected Characteristics that may be affected by your proposals? (all that apply)	Gender Reassignment	Marriage and Civil Partnership	Pregnancy and Maternity			
	Race	Religion or Belief	Sex			
	Sexual Orientation	Other				
 3. Is the responsibility shared with another directorate, authority or organisation? If so: Who are the partners? Who has the overall responsibility? How have they been involved in the assessment? 	ty to ensure sufficient ectorate, though the sy with the involvemer Enterprise, Finance,	school nt of				
	local authority and schools	gramme is being delivered is.	ın parmersnip betwee	en uie		

Stage 2: Evidence / Data Collation

4. What evidence / data have you reviewed to assess the potential impact of your proposals? Include the actual data, statistics reviewed in the section below. This can include census data, borough profile, profile of service users, workforce profiles, results from consultations and the involvement tracker, customer satisfaction surveys, focus groups, research interviews, staff surveys; complaints etc. Where possible include data on the nine Protected Characteristics.

(Where you have gaps (data is not available/being collated), you may need to include this as an action to address in your Improvement Action Plan at Stage 7)

Age (including carers of young/older people)

Harrow is experiencing a growing and changing population and there is increasing pressure on the current provision for pupils with special educational needs. This is both in the number of places available and also on the funding. In Harrow there is provision for pupils with special educational needs in a range of settings including mainstream schools, additionally resourced mainstream school settings, and special schools. Some pupils also attend schools outside of Harrow. A shortfall of local provision increases the costs of placements at provision outside the borough.

See Appendix A of this EqIA for data about the profile of pupils attending the school.

The total number of special needs statements in Harrow has increased by 93 or 9% between 2006 and 2011 calendar years. In addition, the percentage of children with a statement placed in a special school (Harrow, other local authority, independent or non-maintained) has increased from 35% to 43% during the same period. This represents continued pressure and demand for more special school places. The four special schools have nearly reached capacity within their existing sites.

The factors contributing to this increasing demand include:

Disability (including carers of disabled people)

- rising overall demography;
- increase in premature baby survival rate with the consequent greater percentage of children with severe and complex needs;
- growing number of children with significant learning difficulties moving in to the borough.

The biggest growth in demand across the four special schools is for pupils with autism (63% increase between 2009 and 2012). Three specialist resourced provisions for pupils with autism have been established in mainstream schools, providing eventually 36 places. While this proposal to create additional school places would increase specialist resourced provision for autism in mainstream schools, more special school places will be required to accommodate pupils with severe autism and statutory proposals to expand special schools were approved in April 2014.

		New accessible accommodation appropriate to the special educational needs of the children would be constructed to provide the necessary teaching spaces and facilities to accommodate the additional children. Site feasibility study has been undertaken by architects to develop outline designs within the funding allocation available. These have been developed in discussion with the school and have been signed off by the school to enable detailed design work to be progressed.				
		See Append	dix A of this EqIA for data about the profile of pupils attending	the school.		
Gender Reassignment		Not applicat	ole in the context of the expansion of this school.			
Marriage / Civil Partners	hip	Not applicat	ole in the context of the expansion of this school.			
Pregnancy and Maternity	/	Not applicat	ole in the context of the expansion of this school.			
Race		This is a community school which draws pupils from its local area and the pupil profile reflects the ethnicity of its area. The January 2013 School Census demonstrates that the school has an ethnically diverse pupil population.				
		See Appendix A of this EqIA for data about the profile of pupils attending the school. See Appendix B of this EqIA for the ethnic groups in the main wards from which children attend the school.				
		· · · · · · · · · · · · · · · · · · ·				
Religion and Belief		This is a community school which draws pupils from its local area and the pupil profile reflects the religions and beliefs of its area.				
Sex / Gender		This is a community school which draws pupils from its local area and the pupil profile reflects the gender of its area. See Appendix A of this EqIA for data about the profile of pupils attending the school.				
Sexual Orientation		Not applicable in the context of the expansion of this school.				
Socio Economic		Not applicable in the context of the expansion of this school.				
5. What consultation ha	ve you under	taken on your	proposals?			
Who was consulted? What consultation methods were used?		nsultation	What do the results show about the impact on different groups / Protected Characteristics?	What actions have you taken to address the findings of the consultation? (This may include further consultation with the affected groups, revising your proposals).		
The consultation on the Consultation documents		documents	The level of consultation response was fairly low but did indicate	Concerns about increased traffic and		

draft Special School SEN Placements Planning Framework and options to increase provision was undertaken from Monday 12 November to Friday 21 December 2012.

There was a wide distribution by letter to stakeholders. Schools were asked to engage with their school communities as they think best to encourage responses, and the detailed documents and newsletter text were provided. Schools were asked to refer individuals to the Harrow Council website to make responses or to forward any paper responses to Harrow Council. Interested parties were asked to send their views and comments and to do all they can to promote engagement in the consultation among their staff, membership or contacts.

were distributed to all schools, chairs of governors, colleges and other stakeholders.

Information was included for distribution together with text that could be used in a communication or newsletter, and organisations were asked to facilitate discussion at any meetings or gatherings there may be. It was offered that officers are willing to attend any discussions they may arrange as availability permits.

Meetings for parents were also held at Woodlands, Kingsley and Shaftesbury special schools.

A Special School and SEN Placements Planning Framework page was created on the Harrow Council website with links to detailed information and to the electronic consultation response portal.

a broad level of support for the direction of the Framework and the options presented in the consultation. The consultation responses were supplemented by discussions and open meetings held during the consultation.

<u>Key themes:</u>Positive comments about Kingsley, Shaftesbury and

Woodlands.

- Recognition of the need to increase provision and the challenges that this presents.
- Responses suggested increasing the size of existing schools. But also acknowledged the site restrictions and the importance of not increasing the schools to a size that would lose their sense of community.
- Both Kingsley and Shaftesbury governors would want to retain their post-16 provision.
- A number of comments were made about the range of pupil need that would need to be met in the proposal for an additional post-16 provision, points of transition.
- Suggestions were made about increasing specific provision e.g. for children and young people with autism, opening another special school.

associated congestion, access and parking problems have been raised in relation to all school expansions.

Measures are being put in place to address the traffic and congestion issues. These measures include:

- Transport Statements at additional special educational needs places provision. Mott MacDonald, an independent company, has been procured to undertake this work.
- Appointment of a Transport and Travel Planner Officer for the expansion projects to develop and implement effective travel strategies in conjunction with the schools.
- A communication strategy for the school expansion projects to raise the profile of school travel planning. An additional Communications Officer has been engaged to give this work a high profile.

Phase 2 consultation responses have been sent to Mott MacDonald and the Transport and Travel Planner Officer for inclusion in their work.

6. What other (local, regional, national research, reports, media) data sources that you have used to inform this assessment?

List the Title of reports / documents and websites here.

A regional approach is an important aspect of meeting the needs of children and young people with special educational needs. Contacts are being developed with free school proposers, and with neighbouring local authorities through the West London Alliance, to inform work to meet the need.

Stage 3: Assessing Potential Disproportionate Impact

7. Based on the evidence you have considered so far, is there a risk that your proposals could potentially have a disproportionate adverse impact on any of the Protected Characteristics?

	Age (including carers)	Disability (including carers)	Gender Reassignment	Marriage and Civil Partnership	Pregnancy and Maternity	Race	Religion and Belief	Sex	Sexual Orientation
Yes									
No									

YES - If there is a risk of disproportionate adverse Impact on any ONE of the Protected Characteristics, continue with the rest of the template.

- **Best Practice:** You may want to consider setting up a Working Group (including colleagues, partners, stakeholders, voluntary community sector organisations, service users and Unions) to develop the rest of the EqIA
- It will be useful to also collate further evidence (additional data, consultation with the relevant communities, stakeholder groups and service users directly affected by your proposals) to further assess the potential disproportionate impact identified and how this can be mitigated.

NO - If you have ticked 'No' to all of the above, then go to Stage 6

Although the assessment may not have identified potential disproportionate impact, you may have identified actions which can be taken to

advance equality of opportunity to make your proposals more inclusive. These actions should form your Improvement Action Plan at Stage 7 Stage 4: Collating Additional data / Evidence 8. What additional data / evidence have you considered in Note: Please go to Stage 6. relation to your proposals as a result of the analysis at Stage 3? (include this evidence, including any data, statistics, titles of documents and website links here) 9. What further consultation have you undertaken on your proposals as a result of your analysis at Stage 3? What actions have you taken to address the findings of the What do the results show about consultation? What consultation methods were Who was consulted? the impact on different groups / (This may include further consultation used? **Protected Characteristics?** with the affected groups, revising your proposals).

Note: Please go	to Stage 6.							
Stage 5: Assessing Impact and Analysis 10. What does your evidence tell you about the impact on different groups? Consider whether the evidence shows potential for differential impact, if so state whether this is an adverse or positive impact? How likely is this to happen? How you will mitigate/remove any adverse impact?								
Protected Characteristic	Adverse	Positive	Explain what this impact is	n also be used to sals meet the aims of	What me impact or a further cons monito	asures can you take advance equality of	e to mitigate the force of the	,
Age (including carers of young/older people)			Note: Please go to Stage 6.					
Disability (including carers of disabled people)								
Gender Reassignment								
Marriage and Civil Partnership								

Pregnancy and Maternity							
Race							
Religion or Belief							
Sex							
Sexual orientation							
			what else is happening within the	Yes		No	
			our proposals have a cumulative	Note: Please go	to Stage 6.		
impact on a par	rticular Prote	ected Charact	eristic?				
If yes which Dr	rotacted Cha	ractoristics of	ould be affected and what is the				
If yes, which Protected Characteristics could be affected and what is the potential impact?							
11a. Any Other Impact – Considering what else is happening within the			Yes		No		
Council and Harrow as a whole (for example national/local policy,			Note: Please go	to Stage 6.			
austerity, welfare reform, unemployment levels, community tensions,				-			
levels of crime) could your proposals have an impact on individuals/service users socio economic, health or an impact on community cohesion?							
users socio eco	nomic, near	ii oi aii iiiipa	ct of confindinty conesion:				
If yes, what is t	the potential	impact and I	how likely is to happen?				

12. Is there any evidence or concern that the potential adverse impact identified may result in a Protected Characteristic being disadvantaged? (Please refer to the Corporate Guidelines for guidance on the definitions of discrimination, harassment and victimisation and other prohibited conduct under the Equality Act) available on Harrow HUB/Equalities and Diversity/Policies and Legislation

	Age (including carers)	Disability (including carers)	Gender Reassignment	Marriage and Civil Partnership	Pregnancy and Maternity	Race	Religion and Belief	Sex	Sexual Orientation
Yes									
No									

If you have answered "yes" to any of the above, set out what justification there may be for this in Q12a below - link this to the aims of the proposal and whether the disadvantage is proportionate to the need to meet these aims. (You are encouraged to seek legal advice, if you are concerned that the proposal may breach the equality legislation or you are unsure whether there is objective justification for the proposal)

If the analysis shows the potential for serious adverse impact or disadvantage (or potential discrimination) but you have identified a potential justification for this, this information must be presented to the decision maker for a final decision to be made on whether the disadvantage is proportionate to achieve the aims of the proposal.

- If there are adverse effects that are not justified and cannot be mitigated, you should not proceed with the proposal. (select outcome 4)
- § If the analysis shows unlawful conduct under the equalities legislation, you should not proceed with the proposal. (select outcome 4)

Stage 6: Decision **13.** Please indicate which of the following statements best describes the outcome of your EqIA (tick one box only) Outcome 1 - No change required: the EqIA has not identified any potential for unlawful conduct or disproportionate impact and all opportunities to advance equality are being addressed. Outcome 2 – Minor adjustments to remove / mitigate adverse impact or advance equality have been identified by the EqIA. List the actions you propose to take to address this in the Improvement Action Plan at Stage 7 Outcome 3 – Continue with proposals despite having identified potential for adverse impact or missed opportunities to advance equality. In this case, the justification needs to be included in the EqIA and should be in line with the PSED to have 'due regard'. In some cases, compelling reasons will be needed. You should also consider whether there are sufficient plans to reduce the adverse impact and/or plans to monitor the impact. (Explain this in 13a below) Outcome 4 – Stop and rethink: when there is potential for serious adverse impact or disadvantage to one or more protected groups. (You are encouraged to seek Legal Advice about the potential for unlawful conduct under equalities legislation) 13a. If your EqIA is assessed as outcome 3 or you have ticked 'yes' in Q12, explain your justification with full reasoning to continue with your proposals.

Stage 7: Improvement Action Plan

14. List below any actions you plan to take as a result of this Impact Assessment. This should include any actions identified throughout the EqIA. How will you know Date Action Area of potential

adverse impact e.g. Race, Disability	Action required to mitigate	this is achieved? E.g. Performance Measure / Target	Target Date	Lead Officer	included in Service / Team Plan
Age. Insufficient school places for children in Harrow.	Work has been undertaken to maximise funding from the Government to create additional school places. This has included applications to the Priority School Building Programme and the Targeted Basic Need Programme, as well as work to maximise the annual basic need allocations.	Delivery, affordability and value for money will be monitored by the corporate Programme Board. Key milestones will be reported with RAG ratings to monitor progress.	1 September 2015.	Chris Spencer, interim Corporate Director Children & Families, through the Programme Board.	1 September 2013

Insufficient education provision to meet the needs of children with special educational needs.	This area of potential adverse impact of the increased number of children in the borough has been considered. Harrow Cabinet agreed its Special School and SEN Placements Planning Framework in July 2013, and successful applications have been made to the Government's Targeted Basic Need Programme for funds to expand the places in Harrow's special schools and to create more additionally resourced provision places in Harrow's mainstream schools.	Completion of the projects to expand Harrow's special schools and to create units for more additionally resourced provision places in Harrow's mainstream schools.	1 September 2015.	Chris Spencer, interim Corporate Director Children & Families, through the Programme Board.	1 March 2013
Residents / Service Users. Many concerns about the impacts of traffic congestion.	Measures are being put in place to address the traffic and congestion issues arising from the creation of additional school places. See Section 5 above. The Phase 2 consultation responses have been sent to Mott MacDonald and the Transport and Travel Planner Officer for inclusion in their work.	Traffic Statements and School Travel Plans will be submitted as part of the Planning Applications.	18 June 2014.	Mark Sperring, Interim Head of Capital Project Team.	November 2013.

Stage 8 - Monitoring							
The full impact of the proposals may only be known after they have been implemented. It is therefore important to ensure effective monitoring measures are in place to assess the impact.							
15. How will you monitor the impact of the proposals once they have been implemented? What monitoring measures need to be introduced to ensure effective monitoring of your proposals? How often will you do this? (Also Include in Improvement Action Plan at Stage 7)	The School Organisation Officer Group, comprised of representatives from relevant corporate departments, meets monthly and will monitor the impact of proposals and the continuing levels of need.						
16. How will the results of any monitoring be analysed, reported and publicised? (Also Include in Improvement Action Plan at Stage 7)	Regular reports are presented to Cabinet on school organisation matters, including quarterly update reports on the school expansion programme. These reports are published on the Harrow Council website. The School Expansion Stakeholder Reference Group has been						

	established and meets monthly. The School Expansion Stakeholder Reference Group is a cross party representative group to provide advice and guidance on the implementation of the school expansion programme. The meetings are minuted. The Programme Board of senior corporate officers and the constructor meets regularly to monitor the construction programme to ensure
	appropriate accommodation is provided at the schools for the
	additional pupils.
	A range of views and comments were received in relation to the
	expansion proposal (see section 5 in Stage 2 above).
17. Have you received any complaints or compliments about the	In the statutory consultations held in autumn 2013 about the
proposals being assessed? If so, provide details.	expansion of schools in Phase 2 of the school expansion programme,
	61% of consultation responses agreed with the approach to creating
	additional school places in Harrow.

Stage 9: Public Sector Equality Duty

18. How do your proposals contribute towards the Public Sector Equality Duty (PSED) which requires the Council to have due regard to eliminate discrimination, harassment and victimisation, advance equality of opportunity and foster good relations between different groups.

(Include all the positive actions of your proposals, for example literature will be available in large print, Braille and community languages, flexible working hours for parents/carers, IT equipment will be DDA compliant etc)

Horizing Hours for parones careful 11 equipment in 50 557 compliant etc.							
Eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Equality Act 2010	Advance equality of opportunity between people from different groups	Foster good relations between people from different groups					
By acting to ensure all children in Harrow have access to a high quality school place, Harrow is promoting equality of opportunity for all children and young people.	By acting to ensure all children in Harrow have access to a high quality school place, Harrow is promoting equality of opportunity for all children and young people.	By acting to ensure all children in Harrow have access to a high quality school place, Harrow is promoting equality of opportunity for all children and young people.					

Stage 10 - Organisational sign Off (to be completed by Chair of Departmental Equalities Task Group)

The completed EqIA needs to be sent to the chair of your Departmental Equalities Task Group (DETG) to be signed off.

19 . Which group or committee considered, reviewed and agreed the EqIA and the Improvement Action Plan?	The corporate Equality Impact Assessment Quality Assurance Group.					
Signed: (Lead officer completing EqIA)	Chris Melly	Signed: (Chair of DETG)	Richard Selwyn			
Date:	23 rd May 2014	Date:	29 May 2014			
Date EqIA presented at the EqIA Quality Assurance Group	3 rd February 2014 (Sample EqIAs presented to inform the EqIAs on all 15 of the Phase 2 expansion schools)	Signature of ETG Chair				

October 2013 School Census	Earlsmead Primary School
AGE as at 31st August 2013	
3	0.0%
4	14.3%
5	14.5%
6	15.3%
7	14.3%
8	12.8%
9	15.0%
10	14.0%
11	0.0%
Grand Total	400
GENDER	
Female	50%
Male	50%
Grand Total	400
ETHNICITY	
Indian	10.5%
Asian Other	21.8%
Pakistani	1.8%
Black African	7.5%
Black Caribbean	6.3%
Black Other	0.5%
Mixed Other	2.5%
White and Asian	3.3%
White and Black African	0.3%
White and Black Caribbean	2.3%
Information Not Yet Obtained	0.5%
Any Other Ethnic Group	3.3%
Refused	0.8%
White - British	5.5%
Traveller of Irish Heritage	0.8%
Any Other White Background	9.0%
Gypsy / Roma	0.3%
Unknown	23.5%
Grand Total	400
SEN	
No SEN	88.5%
School Action	3.3%
School Action Plus	5.8%
Statement of SEN	2.5%
Grand Total	400

Source: Collect export: Final Oct 2013 Schools & academies.xls

KS201EW - Ethnic group		imary Planning	Area					Α	ppendix B	
ONS Crown Copyright Reserved [from Nomis	on 19 February 201	4]								
Population - All usual residents	Main Wards fo	r the South Wes	t Primary Plann	ing Area						
Units - Persons		upils in these Ward			g area)					
Date - 2011	(3.33733. p.			5 a.io p.a.i	9 ,					
Ethnic Group	Harrow or	the Hill	Rayners Lar	те	Roxbo	ourne	Roxeth		West H	arrow
	number	%	number	%	number	%	number	%	number	9,
All usual residents	12,270	100.0	11,124	100.0	12,828	100.0	11,663	100.0	10,373	100.
White: English/Welsh/Scottish/Northern Irish/British	4,224	34.4	2,954	26.6	3,182	24.8	2,701	23.2	3,351	32.:
White: Irish	404	3.3	208	1.9	241	1.9	334	2.9	365	3.
White: Gypsy or Irish Traveller	11	0.1	10	0.1	13	0.1	23	0.2	1	0.0
White: Other White	1,174	9.6	668	6.0	887	6.9	878	7.5	873	8.4
Mixed/multiple ethnic groups: White and Black Caribbean	157	1.3	103	0.9	194	1.5	135	1.2	97	0.9
Mixed/multiple ethnic groups: White and Black African	68	0.6	21	0.2	72	0.6	66	0.6	44	0.4
Mixed/multiple ethnic groups: White and Asian	259	2.1	119	1.1	173	1.3	225	1.9	199	1.9
Mixed/multiple ethnic groups: Other Mixed	162	1.3	118	1.1	140	1.1	138	1.2	125	1.:
Asian/Asian British: Indian	2,339	19.1	3,096	27.8	2,383	18.6	2,301	19.7	2,343	22.0
Asian/Asian British: Pakistani	344	2.8	392	3.5	447	3.5	415	3.6	378	3.0
Asian/Asian British: Bangladeshi	40	0.3	130	1.2	99	0.8	116	1.0	56	0.
Asian/Asian British: Chinese	200	1.6	140	1.3	80	0.6	122	1.0	131	1.3
Asian/Asian British: Other Asian	1,423	11.6	2,306	20.7	2,836	22.1	2,529	21.7	1,235	11.
Black/African/Caribbean/Black British: African	413	3.4	210	1.9	827	6.4	498	4.3	364	3.9
Black/African/Caribbean/Black British: Caribbean	415	3.4	258	2.3	518	4.0	511	4.4	300	2.9
Black/African/Caribbean/Black British: Other Black	211	1.7	120	1.1	392	3.1	321	2.8	202	1.9
Other ethnic group: Arab	237	1.9	111	1.0	179	1.4	174	1.5	180	1.
Other ethnic group: Any other ethnic group	189	1.5	160	1.4	165	1.3	176	1.5	129	1.:
Main Ethnic Groups White	5.813	47.4	3.840	34.5	4,323	33.7	3,936	33.7	4,590	44.:
Mixed/multiple ethnic groups	646	5.3	361	3.2	579	4.5	564	4.8	4,590	44.
Asian/Asian British	4,346	35.4	6,064	54.5	5,845	45.6	5,483	47.0	4,143	39.9
Black/African/Caribbean/Black British	1,039	8.5	588	5.3	1,737	13.5	1,330	11.4	866	8.3
Other ethnic group	426	3.5	271	2.4	344	2.7	350	3.0	309	3.
In order to protect against disclosure of perso	nal information, reco	ords have been swapp	ed between differen	t geographic area	s. Some coun	ts will be affected, par	ticularly small count	s at the lowes	geographies.	