

WELSH GOVERNMENT INTEGRATED IMPACT ASSESSMENT

Title of proposal:	Single Unified Safeguarding Review (SUSR)
Official(s) completing the Integrated Impact Assessment (name(s) and name of team):	Sarah Lamberton
Department:	Safeguarding and Advocacy
Head of Division/SRO (name):	Sarah Cooper
Cabinet Secretary/Minister responsible:	First Minister
Start Date:	Sept 2022

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SECTION 1. WHAT ACTION IS THE WELSH GOVERNMENT CONSIDERING AND WHY?

The Single Unified Safeguarding Review (SUSR) statutory guidance will be issued under section 139 of *The Social Services and Well-being (Wales) Act 2014*¹. The criteria for conducting a Single Unified Safeguarding Review consist of several inter-related parts, as laid down in *The Safeguarding Boards (Functions and Procedures) (Wales) Regulations 2015*², the *Domestic Violence, Crime and Victims Act (2004)*³ and section 24 of the *Police, Crime, Sentencing and Courts Act 2022* and the *Police, Crime, Sentencing and Courts Act 2022 (Offensive Weapons Homicide Reviews) Regulations 2022*⁴.

The development of the SUSR process in Wales has been undertaken to:

- a) Build upon the good practice that emerged from the creation of the Adult Practice Review and Child Practice Review processes which replaced the former Serious Case Review guidance in April 2016. The Adult Practice Review and Child Practice Review processes were laid down in the *Safeguarding Boards (Functions and Procedures) (Wales) Regulations 2015*⁵ to enable a greater understanding of what happened during an incident and why it happened. The approach improves the understanding of impacts that actions of organisations and agencies had and whether different actions may have resulted in different outcomes for the child or adult at risk. The overall aim is to create a learning environment.
- b) Implement the findings of the 2018 academic review led by Professor Amanda Robinson (2018)⁶ from Cardiff University and a Welsh Government practitioner's review by Assistant Chief Constable Liane James (2018)⁷. The reports analysed the existing safeguarding review landscape alongside a sample of Domestic Homicide Reviews, Adult Practice Reviews, Child Practice Reviews and Mental Health Homicide Reviews. These reports highlighted the need for co-ordination,

¹ Section 139 *The Social Services and Well-being (Wales) Act 2014*. [Section 139](#)

² Regulation 4(3) and 4(4). [Safeguarding Boards Regulations 2015](#)

³ Section 9(1). [Domestic Violence, Crime and Victims Act 2004](#)

⁴ *Police, Crime, Sentencing and Courts Act 2022 (Offensive Weapons Homicide Reviews) Regulations 2022* [Police, Crime, Sentencing and Courts Act](#)

⁵ *Safeguarding Boards (Functions and Procedures) (Wales) Regulations 2015*. <https://www.legislation.gov.uk/wsi/2015/1466/contents/made>

⁶ Robinson, A., Rees, A. and Dehaghani, R. (2018) '*Findings from a thematic analysis of reviews into adult deaths in Wales: Domestic Homicide Reviews, Adult Practice Reviews and Mental Health Homicide Reviews*'

⁷ James, L. (2018) '*Domestic Homicide Reviews in Wales: Illuminate the Past to Make the Future Safer*'

collaboration, communication, and governance to be improved when conducting reviews in Wales. The reports made recommendations based on their findings which are reflected in the new processes of the SUSR system. The reports also exposed the complexity of devolved and non-devolved bodies undertaking reviews in isolation and in some cases without Welsh Government knowledge or involvement. This ultimately resulted in the recommendation for a single review process.

The combined evidence from both the academic and practitioners' reviews mentioned above, provided Welsh Ministers with powerful evidence to support the need for change in relation to the review processes in Wales. Consequently, the SUSR process has been developed to strengthen the review landscape within Wales. The SUSR aims to:

- create a single review process which incorporates a multi-agency approach where the criteria for **one or more** of the following reviews is met:
 - Adult Practice Review;
 - Child Practice Review;
 - Domestic Homicide Review;
 - Mental Health Homicide Review; and
 - Offensive Weapons Homicide Review⁸.
- eliminate the need for families to take part in an onerous and traumatising cycle of information-giving and waiting;
- create a national body that provides a co-ordination/operational role to oversee the end-to-end process (the SUSR Co-ordination Hub);
- ensure that the governance agreed is in place and effective.
- ensure that it shows clear linkages between regions and national bodies while respecting regional variations in arrangements; and
- retain the final review Report in a central repository (the Wales Safeguarding Repository) and facilitate pan-Wales training and local, regional, national, and international learning.

The SUSR ties into our wider aspiration for One Welsh Public Service. In line with the Five Ways of Working set out in the *Well-being of Future Generations (Wales) Act*, we know that we can only deliver the best outcomes for current and future generations if we support an integrated and collaborative approach to policy and delivery which breaks down silos, draws together insights from different spheres of expertise and encourages partnership working across the whole of the public service as well as with wider social partners.

The SUSR lays out a framework for how Regional Safeguarding Boards should work in partnership with Community Safety Partnerships and other partnerships in the area such as Public Service Boards and Regional Partnership Boards to protect people from harm -

⁸ Offensive Weapon Homicide Reviews are to be piloted (2023) using the SUSR process in Wales and therefore may be subject to change.

sharing lessons and ensuring we work together to secure the wellbeing of every person in Wales.

In order to achieve these aims, a support network for the SUSR process has been developed. The new systems mentioned above have been summarised below:

THE WALES SAFEGUARDING REPOSITORY

- a) All completed SUSRs will be retained in the Wales Safeguarding Repository (WSR). Their findings will be used to inform learning on a pan-Wales basis through the creation of thematic reports. Please see the Wales Safeguarding Repository section within section 8 of this guidance for more detail.

THE SUSR CO-ORDINATION HUB

- b) The role of the Single Unified Safeguarding Review Co-ordination Hub is to support the SUSR process and assist in the identification and dissemination of key messages, themes, and issues, by working collaboratively with the WSR, Regional Safeguarding Boards and other key partners and partnerships. The Co-ordination Hub will collate the outcomes of Learning Events ensuring all outcomes are disseminated across Wales, and with relevant UK bodies where appropriate. This will include delivery of themed training and bi-annual themed dissemination events (see section 8 of this guidance for more information) to share good practice and lessons learned across Wales. This will ensure learning is achieved and implemented to safeguard individuals and communities across Wales.

SUSR MINISTERIAL BOARD FOR WALES

- c) The Ministerial Board provides political and strategic oversight of SUSRs, ensuring national issues are considered and a pan-Wales response is provided when required. The Board will provide support for legislative changes and securing the necessary resources so that best practice is implemented and shared. The Board will also act as a platform for escalating any regional issues which are identified that require a national or UK response. Please see section 5 for the roles and responsibilities of the Ministerial Board.

Outcomes and Impact

The overarching outcome is the creation of a proactive approach to taking solutions forward and a positive shared learning culture, which is an essential requirement for achieving effective and improved multi-agency service delivery. Therefore, a single review process, and not multiple reviews on an incident, creates a simplified yet concentrated approach. This

approach will reduce further trauma for families, potential duplication of effort, which utilises resources, and delivers learning in a timely and proportionate manner.

The outcomes of the SUSR process will have local, regional, and national impacts on practices across Wales. These include:

- the SUSR will provide one process for either a single or multiple review in Wales, making it clearer for all partner agencies involved;
- the SUSR process will reduce trauma for the subject of the review, their families, and other principal individuals by carrying out a single review rather than multiple;
- all recommendations from SUSR Reports will be incorporated within an Action Plan, monitored, and disseminated pan-Wales by the SUSR Co-ordination Hub. This will ensure that they are being implemented in order to improve practices;
- the governance system will ensure Welsh Government oversight of recommendations for both devolved and non-devolved services in Wales. This will be achieved where escalation of issues to the Ministerial Board is necessary;
- the Wales Safeguarding Repository will enable practitioners who have access to the WSR to draw together learning from the SUSR Reports to produce thematic reports. The learning from the thematic reports will be disseminated nationally by the SUSR Co-ordination Hub; and
- the evolution of practices in this way will ensure that they remain fit for purpose in an ever-changing society. This will help to prevent similar incidents and ultimately reduce harm going forward.

SECTION 8. CONCLUSION

(Please note that this section will be published)

8.1 How have people most likely to be affected by the proposal been involved in developing it?

The whole process has been developed in collaboration with stakeholders and practitioners who work with children and young people and adults at risk. They have been able to evidence the positive impacts that this proposal will have on these groups throughout the development process to ensure that it is fit for purpose in practice. We were careful to avoid re-traumatisation for the individuals by working with their advocates and third sector organisations who work with them. This included third sector organisations who represented and worked alongside people with different protected characteristics. This ensured that their voices were heard as their experiences were captured, but they were not subject to meetings or large groups of practitioners themselves.

SUSR pilots have been undertaken by Regional Safeguarding Boards in Wales. If there were children involved in the case (either as direct victims, or as family members of the subject of the review), then they would have had contact with the SUSR process as part of this process.

The Task and Finish groups and Steering Group which helped with the development of the SUSR process included stakeholders whose first language is Welsh. The groups ensured that all of the materials created which were available to the public would be available in Welsh. This includes all templates, training and learning resources which will be produced throughout the SUSR process.

8.2 What are the most significant impacts, positive and negative?

The measures within this proposal will have a positive impact on the children and adults at risk that the SUSR process seeks to protect. In line with the *Safeguarding Boards (Functions and Procedures) (Wales) Regulations 2015*⁹, the SUSR process will generate learning through reviews which will inform and improve practices and services going forward. In turn, this will more greatly protect and safeguard communities from harm. The SUSR process will then ensure that this learning is disseminated across Wales to share valuable information across regions. In proposal will help services to adapt and change their practices based on the ever-changing communities in Wales.

⁹ *Safeguarding Boards (Functions and Procedures) (Wales) Regulations 2015*.
<https://www.legislation.gov.uk/wsi/2015/1466/contents/made>

The SUSR process has been created by practitioners to develop a more effective and efficient process that will be detailed, but more streamlined in its approach, by:

- delivering a single review and not multiple reviews on an incident;
- creating a simplified yet concentrated approach to reviews which reduces trauma to families, duplication of effort, utilises resources and achieves best value;
- producing a review report that is about improving service delivery with a clear Action Plan which will be monitored by the relevant Regional Safeguarding Boards and the SUSR Co-ordination Hub (and the Offensive Weapon Homicide Oversight Board where relevant);
- ensuring the victim/family impacted is at the heart of the review process; and
- enabling the sharing of information, recommendations, and thematic learning to safeguard future generations.

This proposal is a new process which will contribute to the prevention of serious incidents across the whole of Wales through the generating and sharing of multi-agency learning.

8.3 In light of the impacts identified, how will the proposal:

- **maximise contribution to our well-being objectives and the seven well-being goals; and/or,**
- **avoid, reduce or mitigate any negative impacts?**

A prosperous Wales – The proposals have the potential to have a minimal positive impact on economic well-being for individuals and a minimal positive impact for communities. A reduction in trauma for the victim or family as a result of only carrying out one review rather than multiple will have a positive impact on their educational opportunities.

A resilient Wales – The proposals will have a significant positive impact on the resilience of Welsh services. The information sharing between multi-agencies will ensure that services and agencies are properly prepared for supporting individuals based on their different needs.

A healthier Wales - The proposals have the potential to have a significant positive impact on mental and physical well-being outcomes for individuals. The multiple review system that is currently in place may re-traumatise victims or families and therefore have a negative impact on their well-being. The SUSR process will eliminate the need for multiple reviews and will therefore impact well-being positively. The long-term effects of this proposal also mean that more children and adults at risk will be protected from harm and therefore has a positive impact on their mental and physical well-being.

A more equal Wales – The proposals have the potential to have a moderate positive impact on equality. The proposals impact on people with protected characteristics including mental health, disability, age, gender and ethnicity.ⁱ The SUSR statutory guidance offers advice how to engage with people with different protective characteristics and ensures that the process is adaptable based on their needs. The SUSR Co-ordination Hub will monitor and respond to any emerging equality issues throughout implementation and beyond.

A Wales of vibrant culture and thriving Welsh language – The proposals have the potential to have a minimal positive impact on participation in arts, sports and recreation. People who are not subject to abuse or neglect are more likely to participate in these opportunities. The advice in the guidance includes advice on meeting people’s language needs through an active offer of Welsh language services.

A globally responsible Wales – Neutral impact

8.4 How will the impact of the proposal be monitored and evaluated as it progresses and when it concludes?

The SUSR project will be reviewed via the Co-ordination Hub and the IIA will form part of that review. This will help to ensure that the process works for everyone.

SECTION 9. DECLARATION

Declaration

I am satisfied that the impact of the proposed action has been adequately assessed and recorded.

Name of Senior Responsible Officer / Deputy Director:

Alistair Davey, Deputy Director, Enabling People.

Department:

Social Services and Integration Directorate, Health and Social Services.

Date:

07/12/2022

FULL IMPACT ASSESSMENTS

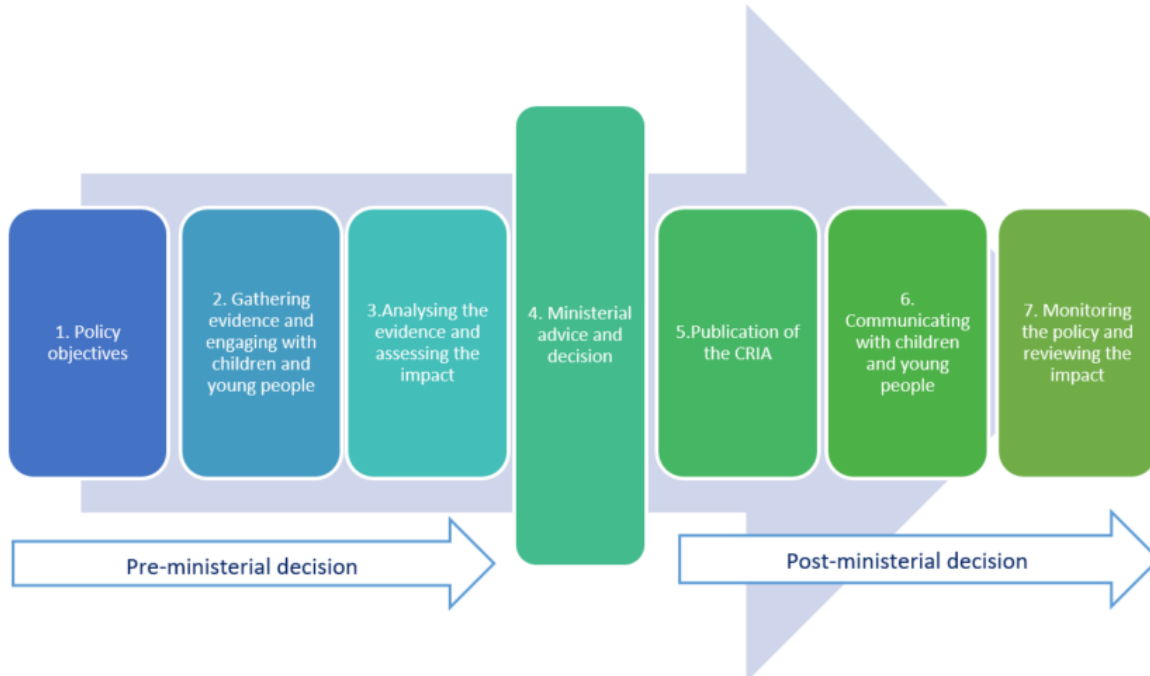
A. CHILDREN'S RIGHTS IMPACT ASSESSMENT

All completed Children's Rights Impact Assessments must be sent to the CRIA@gov.wales mailbox

The Rights of Children and Young Persons (Wales) Measure 2011 places a duty on the Welsh Ministers to pay due regard to the [United Nations Convention on the Rights of the Child \(UNCRC\)](#) and its [Optional Protocols](#) when exercising any of their functions.

The CRIA process is the agreed mechanism officials should use to support Ministers to meet this duty and ensure they give balanced consideration to children's rights in their decision making. A CRIA should be used to inform ministerial advice and **must** be completed prior to a ministerial decision being made. Once a decision has been reached, your CRIA must also be published.

Please note we have an established Children's Rights Advisory Group (CRAG), comprising the Children's Commissioner for Wales's office, UNICEF, the Wales Observatory on Human Rights of Children and Young People, and Children in Wales, who can be used to discuss or test your draft CRIA. Please contact the Children's Branch CRIA@gov.wales for further information.



For further advice and guidance on the CRIA process, please consult the [Children's Rights Manual for Staff](#) or contact the Children's Branch CRIA@gov.wales

1. Policy objectives

- What decision are you impact assessing?

The Child Practice Review process will be replaced by the Single Unified Safeguarding Review (SUSR) process.

The development of the Single Unified Safeguarding Review (SUSR) process in Wales has been undertaken to build upon the good practice that emerged from the creation of the Adult Practice Review and Child Practice Review processes which replaced the former Serious Case Review guidance in April 2016. The Adult Practice Review and Child Practice Review processes were laid down in the *Safeguarding Boards (Functions and Procedures) (Wales) Regulations 2015*¹⁰ to enable a greater understanding of what happened during an incident and why it happened. The approach improves the understanding of impacts that actions of organisations and agencies had and whether different actions may have resulted in different outcomes for the child or adult at risk. The overall aim is to create a learning environment.

2. Gathering evidence and engaging with children and young People

- What existing research and data on children and young people is available to inform your specific policy? Your policy objective may impact on other policy areas – discussions with other policy teams will be an important part of the impact assessment process ensuring you have gathered a range of information and evidence.

The SUSR process will implement the findings of the 2018 academic review led by Professor Amanda Robinson (2018)¹¹ from Cardiff University and a Welsh Government practitioner's review by Assistant Chief Constable Liane James (2018)¹². The reports analysed the existing safeguarding review landscape alongside a sample of Domestic Homicide Reviews, Adult Practice Reviews, Child Practice Reviews and Mental Health Homicide Reviews. These reports highlighted the need for co-ordination, collaboration, communication, and governance to be improved when conducting reviews in Wales. The reports made recommendations based on their findings which are reflected in the new processes of the SUSR system. The reports also exposed the complexity of devolved and non-devolved

¹⁰ *Safeguarding Boards (Functions and Procedures) (Wales) Regulations 2015*.
<https://www.legislation.gov.uk/wsi/2015/1466/contents/made>

¹¹ Robinson, A., Rees, A. and Dehaghani, R. (2018) *'Findings from a thematic analysis of reviews into adult deaths in Wales: Domestic Homicide Reviews, Adult Practice Reviews and Mental Health Homicide Reviews'*

¹² James, L. (2018) *'Domestic Homicide Reviews in Wales: Illuminate the Past to Make the Future Safer'*

bodies undertaking reviews in isolation and in some cases without Welsh Government knowledge or involvement. This ultimately resulted in the recommendation for a single review process.

Based on the above research, the SUSR process has been developed to strengthen the review landscape within Wales. The SUSR aims to:

- create a single review process which incorporates a multi-agency approach where the criteria for one or more of the following reviews is met: Adult Practice Review; Child Practice Review; Domestic Homicide Review; Mental Health Homicide Review and Offensive Weapons Homicide Review. This will eliminate the need for families to take part in an onerous and traumatising cycle of information-giving and waiting;
- create a national body that provides a co-ordination/operational role to oversee the end-to-end process (the SUSR Co-ordination Hub);
- ensure that the governance agreed is in place and effective.
- ensure that it shows clear linkages between regions and national bodies while respecting regional variations in arrangements; and retain the final review report in a central repository (the Wales Safeguarding Repository) and facilitate pan-Wales training and local, regional, and national learning.

The whole process has been developed in collaboration with stakeholders and practitioners who work with children and young people. They have been able to evidence the positive impacts that this proposal will have on children and young people throughout the development process to ensure that it is fit for purpose in practice.

- Using this research, how do you anticipate your policy will affect different groups¹³ of children and young people, both positively and negatively? Please remember policies focused on adults can impact children and young people too.

The SUSR process will create a simplified yet concentrated approach to reviews which reduces trauma to families, duplication of effort, utilises resources and achieves best value. It will ensure that the victim and family impacted is at the heart of the review process.

¹³ You may, for instance, consider how your policy would affect the following groups of children and young people differently: early years, primary, secondary, young adults; children with additional learning needs; disabled children; children living in poverty; Black, Asian and minority ethnic children; Gypsies, Roma and Travellers; migrants; asylum seekers; refugees; Welsh-language speakers; care experienced children; LGBTQ+ children. Please note that this is a non-exhaustive list and within these cohorts there will not be one homogenous experience.

- What participatory work with children and young people have you used to inform your policy? If you have not engaged with children and young people, please explain why.¹⁴

The whole process has been developed in collaboration with stakeholders and practitioners who work with children and young people. They have been able to evidence the positive impacts that this proposal will have on children and young people throughout the development process to ensure that it is fit for purpose in practice. We were careful to avoid re-traumatisation for the children and young people by working with their advocates and third sector organisations who work with them rather than the children and young people themselves. This ensured that their voices were heard as their experiences were captured, but they were not subject to meetings or large groups of practitioners themselves.

SUSR pilots have been undertaken by Regional Safeguarding Boards in Wales. If there were children involved in the case (either as direct victims, or as family members of the subject of the review), then they would have had contact with the SUSR process as part of this process.

For advice on participatory work with children and young people, please contact the Children's Branch. We have an established relationship with Children in Wales, who may be able to help you work with children and young people through their Young Wales programme.

3. Analysing the evidence and assessing the impact

- Using the evidence you have gathered, what impact is your policy likely to have on children and young people? What steps will you take to mitigate and/or reduce any negative effects?

The SUSR process will create a simplified yet concentrated approach to reviews which reduces trauma to families, duplication of effort, utilises resources and achieves best value. It will ensure that the victim and family impacted is at the heart of the review process.

The engagement guidelines for interacting with children and young people are included

¹⁴ Article 12 of the UNCRC stipulates that children have a right to express their views, particularly when adults are making decisions that affect them, and to have their opinions taken into account.

in the SUSR Statutory Guidance in the ‘*Engagement of Family and Principal Individuals in the Single Unified Safeguarding process*’ section. This was created with practitioners (including third sector organisations) who work with children and young people in review processes. This section offers guidance to practitioners who will be engaging with victims and families (including children) throughout the whole process. Practitioners will also be given SUSR training which will include an evidence-based section setting out the process for engagement.

- How does your proposal enhance or challenge children’s rights, as stipulated by the UNCRC articles and its Optional Protocols? Please refer to the [articles](#) to see which ones apply to your own policy.

UNCRC Articles or Optional Protocol	Enhances (X)	Challenges (X)	Explanation
Article 1 Everyone under 18 years of age has all the rights in this Convention	X		Simplified process which reduces trauma. The outcomes are then used to prevent further harm and similar incidents.
Article 3 All organisations concerned with children should work towards what is best for each child.	X		The SUSR process will produce learning and disseminate this across Wales to all organisations which have contact with children and vulnerable adults as a service. This will help to improve practice to ensure that communities are receiving the best support for their needs.
Article 12 Children have the right to say what they think should happen, when adults are making decisions that affect them, and to have their opinions taken into account.	X		Children (who are the subject of the review or are related in some way to the subject) will be involved with the SUSR process if they wish to be. This will give them the opportunity to share their own experiences from their perspectives. They will have a say

			on whether they want to be involved and to what degree.
<p>Article 13</p> <p>Children have the right to get and to share information as long as the information is not damaging to them or to others.</p>	X		Children (who are the subject of the review or are related in some way to the subject) will be able to access appropriate information on the review process and will receive updates on what is happening during their review.
<p>Article 19</p> <p>Governments should ensure that children are properly cared for, and protect them from violence, abuse and neglect by their parents or anyone else who looks after them.</p>	X		The SUSR process will produce learning and disseminate this across Wales to all organisations which have contact with children and vulnerable adults as a service. This will help to improve practice to ensure that communities are receiving the best support for their needs.
<p>Article 27</p> <p>Children have a right to a standard of living that is good enough to meet their physical and mental needs. The Government should help families who cannot afford to provide this.</p>	X		The review process will produce learning which can be used to improve services which are designed to help children and young people. These services can then be improved based on evidence. The services will then be better equipped to help children and to improve their standard of living.
<p>Article 32</p> <p>The Government should protect children from work that is dangerous or might</p>			Protecting children and vulnerable adults from harm is the overarching aim of the SUSR process. From the learning produced and disseminated from the reviews,

<p>harm their health or their education.</p> <p>Article 33</p> <p>The Government should provide ways of protecting children from dangerous drugs.</p> <p>Article 34</p> <p>The Government should protect children from sexual abuse.</p> <p>Article 35</p> <p>The Government should make sure that children are not abducted or sold.</p> <p>Article 36</p> <p>Children should be protected from any activities that could harm their development.</p>			<p>services to prevent this type of abuse will be improved and updated to meet the changing needs of communities in Wales.</p>
<p>Article 39</p> <p>Children who have been neglected or abused should receive special help to restore their self-respect.</p>			<p>The SUSR process seeks to help to improve services which support children and young people who have been neglected or abused.</p>

For further information on the [UNCRC](#) and its [Optional Protocols](#), please visit the [Children's Rights Intranet Page](#).

4. Ministerial advice and decision

- How will your analysis of these impacts inform your ministerial advice?

The impact assessment will be included as part of the ministerial advice to approve the SUSR public consultation.

- *Once completed, your CRIA must be signed off by your Deputy Director.*
- *Your CRIA findings should be integrated into your ministerial advice to inform their decision.*

5. Publication of the CRIA

- *Following the ministerial decision, the CRIA should be published on the Welsh Government website.*
- *Send sections 1 and 8 of your IIA and the CRIA (Annex A) to your departmental web manager for publishing.*
- ***All** completed CRIAs must also be sent to the CRIA@gov.wales mailbox.*

For further information and support on this process, please visit the [Children's Rights Intranet Page](#) which contains a range of resources.

6. Communicating with Children and Young People

- If you have sought children and young people's views on your proposal, how will you inform them of the outcome?

This will be achieved through the public consultation process on the SUSR Statutory Guidance.

If your policy affects children and young people, remember to produce child-friendly versions of any public document relating to your proposal. Please contact the Children's Branch for further advice.

7. Monitoring and Review

It is essential to revisit your CRIAs to identify whether the impacts that you originally identified came to fruition, and whether there were any unintended consequences.

Where you are taking forward secondary legislation, it will not be sufficient to rely on the CRIA for the primary legislation; you will need to update the CRIA to consider how the details of the proposals in the regulations or guidance may affect children.

The policy lead can revisit the published version of their CRIA, rename it as a review of the original CRIA, and update the evidence of impact. The reviewed impact assessment should be presented to Ministers with any proposals to amend the policy, practice or guidance. This review CRIA should also be published.

- Please outline what monitoring and review mechanism you will put in place to review this CRIA.

The SUSR project will be reviewed via the Co-ordination Hub and the IIA will form part of that review.

- Following this review, are there any revisions required to the policy or its implementation?

We will not know if changes are required until the review is undertaken.
