
STATES OF JERSEY



STATES OF JERSEY COMPLAINTS BOARD: FINDINGS – COMPLAINT BY MR. AND MRS. A. AGAINST A DECISION OF THE MINISTER FOR EDUCATION REGARDING AN APPEAL IN RESPECT OF THE STUDENT GRANT FOR THEIR SON (MR. A. (JUNIOR))

**Presented to the States on 7th September 2017
by the Privileges and Procedures Committee**

STATES GREFFE

REPORT**Foreword**

In accordance with Article 9(9) of the Administrative Decisions (Review) (Jersey) Law 1982, the Privileges and Procedures Committee presents the findings of the Complaints Board constituted under the above Law to consider a complaint by Mr. and Mrs. A. against the Minister for Education regarding an appeal in respect of the student grant for their son (Mr. A. (Junior)).

Connétable L. Norman of St. Clement
Chairman, Privileges and Procedures Committee

STATES OF JERSEY COMPLAINTS BOARD**26th July 2017****Findings of the Complaints Board constituted under
the Administrative Decisions (Review) (Jersey) Law 1982
to consider a complaint by Mr. and Mrs. A
against the Minister for Education regarding
an appeal in respect of the student grant for their son (Mr. A. (Junior))****Present****Board members –**
G. Crill (Chairman)
G. Marett
S. Cuming**Complainant –**
Mr. A.
Mrs. A.**Minister for Education –**
J. Donovan, Chief Education Officer
L. Haws, Senior Finance Manager, Education Department
G. Thebault-Tobin, Student Finance Officer**States Greffe –**
L.M. Hart, Deputy Greffier of the States
K.L. Slack, Clerk

The Hearing was held in public at 10:00 a.m. on 26th July 2017, in the Seymour Room, Morier House.

1. Opening

The Chairman opened the Hearing by introducing the members of the Board and outlining the process which would be followed. He thanked Mr. Marett for stepping in at short notice to replace a colleague who had fallen ill. The Chairman indicated that the Complainants had asked that the meeting be held in private and, whilst this request had not been acceded to, the Board agreed that the Complainants' names would not appear in its findings, due to the sensitive financial nature of some of the evidence.

2. Summary of the Complainants' case

- (i) The Complainants' case was that their son, Mr. A. (Junior), applied in March 2013 to start a 3 year BSc. Paramedic Practice course in September 2013 at [X] University. When the Education Department processed his application for a grant, it had initially awarded him a maintenance grant at Band 2, as set out in Article 2 of the [Education](#)

[\(Discretionary Grants – Amounts\) \(Jersey\) Order 2008](#) ('the Amounts Order'). It was noted that Mr. A. (Junior) had completed his course and his parents had recently attended his graduation.

- (ii) Band 2 was defined in the Amounts Order as relating to 'a paramedical' course. However, the Complainants argued that their son should have been awarded a maintenance grant at Band 4, which was defined in the Amounts Order as –

'Any course in medicine, dentistry or nursing that consists of a period of study by way of clinical training at a hospital or other premises other than the institution at which the person is a student'.

- (iii) The Complainants indicated that Mr. A. (Junior) was required to undertake various placements during his university course and he incurred significant costs, estimated at £3,000 per academic year, in travelling to and from these placements. The locations of the placements were often remote from the university and due to the nature of the training, his shifts often finished at such times as 2:00 a.m., when it was not practical for him to use public transport. Accordingly, he had found it necessary to purchase a vehicle to facilitate his travelling to the placements. The Complainants contended that Band 4 afforded students financial protection and that their son should have been awarded this Band.
- (iv) Mr. A. informed the Board that whilst Band 2 was defined as relating to a 'paramedical' course, it did not specifically refer to the type of degree course that his son had undertaken. Rather, it related to any service or profession which did not require a fully qualified doctor, but which supported medical work. Examples of such professions would be nursing or physiotherapy. Mr. A. indicated that training for these roles would be different from the course that his son had attended, where 50% of the work was theory and 50% clinical.
- (v) The Complainants had challenged the level of the maintenance grant awarded to Mr. A. (Junior), and the Education Department had subsequently increased the award to Band 3, which was defined as '*a course at Buckingham University*'. It should be noted that Mr. A. (Junior) was not a student at Buckingham University.
- (vi) The Complainants indicated that when, in late 2014, they further challenged the level of grant, maintaining that Mr. A. (Junior) should be awarded Band 4, they had been informed that the Education Department allocated the maintenance grants purely on the length of the course being undertaken by a student. The Complainants contended that, until this point, they had been unaware that the duration of a student's course was a relevant factor when decisions were made on the level of maintenance grant. Mr. A. stated that he had discussed the length of his son's course with officers in the Student Finance Office, but it had not been made clear that this was pertinent to the level of grant. He had also read through the Education Department's guide to

higher education awards and could not see any reference to course duration impacting on the level of maintenance grant. He opined that this information should be available in a clear format for students and parents.

- (vii) A letter from the Student Finance Office in October 2014 indicated that Band 2, which Mr. A. (Junior) had originally been awarded, was for courses covering 35 weeks, whereas Band 4 was for clinical years, covering 52 weeks. Band 3, which Mr. A. (Junior) was ultimately awarded, related to courses of 40 weeks' duration.
- (viii) The Complainants drew the Board's attention to a document, contained at page 55 in the bundle, entitled 'Maintenance Amounts', which had tables for the years from 2009 to 2015 and set out the level of grant payable for each of Bands 1 to 5 for each academic year. The Bands were identified at the top of the document in the following way –

“Band 1 – Standard – 32 3/7 weeks

Band 2 – Non clinical medicine – 35 3/7 weeks

Band 3 – Buckingham – 39 3/7 weeks

Band 4 – Clinical medicine – 52 weeks

Band 5 – Nursing – 45 weeks.”.

- (ix) Mr. A. argued that this did not correspond with the wording contained within the Amounts Order. He indicated that, in his view, the Education Department had not implemented its own procedures correctly, had disregarded the costs of his son's placements and should have awarded him Band 4, because the fact that Mr. A. (Junior)'s course was 50% clinical meant that each year of his course should be deemed to be a 'clinical year' and he should be viewed as studying 'clinical medicine'.

3. Summary of the case of the Minister for Education

- (i) The Chief Education Officer informed the Board that because the grants made by the Education Department came from public funds, the methodology used to allocate the same was both fair and transparent and the Department adopted a straightforward approach when making the grants. He contended that there was no statutory requirement for students to be awarded the maintenance grants and they were made on a discretionary basis.
- (ii) The Chief Education Officer indicated that he understood the argument that the placements undertaken by Mr. A. (Junior) had cost him extra money, but he highlighted that it would be unusual for any student not to incur additional costs when studying, whether this was to pay for course books, art materials or other items necessary for their course. The discretionary grants were never intended to meet the full costs of study, he stated, but to provide some financial assistance to students.

- (iii) There were so many different types and varieties of courses that it was not possible for the Department to analyse in great detail every single one, as there were approximately 1,500 Jersey students in higher education at any one time. Therefore, the decision had been taken to adopt the banding system, based on the duration of a course. Because of the length of Mr. A. (Junior)'s course, the Department had already exercised its discretion to award maintenance on Band 3, rather than Band 2.
- (iv) The Chief Education Officer contended that Mr. A. (Junior) had been dealt with fairly. He indicated that he had examined his particular case in great detail, because the Complainants had unsuccessfully appealed the quantum of the maintenance grant in April 2016. He informed the Board that he was satisfied that the outcome was fair and that Mr. A. (Junior) had not been discriminated against in any way. However, he accepted that the guidance that was available was unhelpful.
- (v) It was conceded that at the time that Mr. A. (Junior) had applied for his maintenance grant, it was not explicitly stated that the award was based on the duration of a course, and the Chief Education Officer acknowledged that this was not clear from the Amounts Order, although staff within the Department were fully cognisant of the lengths of the various courses and allocated grants accordingly. He accepted that this had caused some confusion and indicated that the complaint by Mr. A. (Junior) had, in 2017, led to the Minister amending the table contained within Article 2 of the Amounts Order, so that Bands 3, 4 and 5 now referenced the duration of the course per academic year as '*not less than 39 weeks*', '*not less than 48 weeks*' and '*not less than 45 weeks*' respectively, and reference to Buckingham had been removed. However, the Board noted that Band 2, which Mr. A. (Junior) had initially been awarded, still simply referred to '*a paramedical course*', without providing the duration of such a course.
- (vi) The Board queried whether the Department used any other criteria when making a maintenance grant, such as 'London weighting', but was informed that whilst it previously had done, this was no longer the case.
- (vii) In respect of the decision that Mr. A. (Junior) should not receive a Band 4 maintenance grant, the Senior Finance Manager explained that it was only those students who were doing a medical or veterinary degree, who would qualify for such a grant. Although Mr. A. (Junior) undertook placements for periods of 6 weeks at a time, this would not entitle him to receive Band 4.
- (viii) The Student Finance Officer indicated that the Department was careful to ensure that Jersey students were not financially disadvantaged by comparison with their UK counterparts. It had been noted that Mr. A. (Junior) was in receipt of an NHS bursary for £1,360 per term, but the Complainants had indicated that this was for living expenses and not travel costs. Accordingly, on 2 occasions, Mr. A. (Junior) had

been asked to provide information on whether the NHS-funded students had received a contribution towards their travel expenses. The Department also indicated that it reviewed the level of grant provided to each student every year.

- (ix) The Board examined whether the Department received requests for allowances under Article 16A of the [Education \(Discretionary Grants – General\) \(Jersey\) Order 2008](#), which stated –

16A Field trip allowance

- (1) *A student who has been awarded a student grant may be paid a field trip allowance if paragraph (2) applies.*
 - (2) *This paragraph applies if a student is required by the institution at which he or she is a student to attend, during term time, for study at a place other than an institution, a library or the student’s home.*
 - (3) *The amount of the allowance shall not exceed, for each day that the student does so attend, whichever is the lower of –*
 - (a) *the amount prescribed by the Grants Amounts Order in respect of vacation study allowance; and*
 - (b) *the amount reasonably incurred by the student as expenses in attending the field trip, that are in addition to the expenses incurred by the student in attending his or her course.*
 - (4) *An allowance shall not be paid under this Article unless –*
 - (a) *an application that complies with Article 17 has been made for the allowance before the student attends the field trip; or*
 - (b) *the student satisfies the Minister that there is an exceptional reason why an application that complies with Article 17 has not been made before that time.*
- (x) The Board mooted that Mr. A. (Junior) could have been entitled to claim a ‘field trip allowance’ in respect of his placements, because he had been required to study elsewhere than at his university, a library or his home and had incurred additional expenses. Accordingly, it was of the view that it had not been accurate for the Student Finance Office to write to the Complainants, in a letter dated 26th June 2014, that –

‘the department cannot assist with any travel or parking expenses that [Mr. A. (Junior)] may incur (sic) during his time at University. [Mr. A. (Junior)]s course details on University of [X]’s website does clearly states (sic) that the course will be 50% placement and this is something that would have been taken into consideration when applying.’

- (xi) This suggestion was countered by the officers from the Education Department, who indicated that this was not how they construed Article 16A. However, they conceded that much was open to interpretation. The Chief Education Officer accepted that there was room for the wording of Article 16A to be ‘tightened up’, as it would be rare for a student not to be required to study away from their university at some point during their course, and the Department risked being inundated with applications under Article 16A if it were to interpret the legislation in the way proposed by the Board.
- (xii) In relation to the document referred to by the Complainants at page 55 of the bundle, which set out in tables the amount of the grant payable for each of Bands 1 to 5 for each academic year (referenced at paragraph 2(viii) above), the Student Finance Officer informed the Board that the document was solely for the use of employees at the Education Department and provided a ‘quick banding description’ for officers’ ease of reference. It was not intended to be a guide for the Public.
- (xiii) The Board queried whether it would not be more transparent for students to be notified that they would receive a set amount per week of each academic year that they attended university, rather than be placed into a Band which did not necessarily reflect the course that they were attending. This was particularly the case for Band 3: ‘Buckingham’, which, it noted, offered a 2-year fast-track course, rather than the standard 3-year course and would only, strictly speaking, have been relevant to a handful of students. It suggested that the Department had sought to streamline the banding contained within legislation for the convenience of the management thereof.
- (xiv) The Senior Finance Manager denied that the Department interpreted the legislation had been drafted to fit ease of practice, but, rather, to ensure that grant applications were handled in a timely manner. The Chief Education Officer expressed the view that it would not be possible to adopt the straightforward approach suggested by the Board to the allocation of the maintenance grants as, although a course might be advertised as lasting for 39 weeks during an academic year, there would be a fluctuation of between, perhaps, 35 and 40 weeks that a student would actually be studying. Accordingly, broad bands were required, which afforded the Department some discretion. The Department was doing its best to take what was a hugely complex set of circumstances and create a fair and transparent system for in excess of 1,500 students. Regarding the ‘Buckingham’ reference, this was a historical reference, as paramedical courses were generally taught for between 34 and 35 weeks in each academic year, whereas the Buckingham courses lasted for just over 39 weeks.
- (xv) The Chief Education Officer advised the Board that if another student were to apply for a paramedic course, which was of the same duration as the one which Mr. A. (Junior) had attended, the Department would be likely to exercise its discretion and award him, or her, a maintenance grant at Band 3. He emphasized that the Department treated all students

the same and indicated that there were only between 15 and 20 appeals received each year in relation to the award of a grant, and very few were in respect of the level of the maintenance grant awarded.

Since receiving the complaint by Mr. A. (Junior), the Department had reviewed the Bands and amended them to make their allocation more transparent.

4. Additional complaint in respect of the assessment of household income

- (i) Although it did not form part of their substantive complaint to the Board, the Complainants requested that it consider an additional issue, which was the way in which the Education Department assessed household income, because, in their view, it was in the public interest for this to be considered. The Chairman agreed at the start of the Hearing that the Board would hear from the Complainants separately on this matter.
- (ii) The Complainants informed the Board that when they had completed the Income Statement Form for the year ending 2012, for the purpose of requesting a grant for their son, Mr. A. had shown that he had received £1,474.00 from the Social Security Department. In the letter from the Education Department, dated 26th June 2014, the Student Finance Office had written: *“Please note that there was an additional amount of £1,474 declared on your Income Statement form, which Tax are unable to confirm, so this has been added to the amount confirmed”*. Consequently, the Department had increased the Complainants’ annual income, for assessment purposes, by that amount.
- (iii) Mr. A. stated that the £1,474.00 shown on Section 5 of the HE2 form (‘Income Statement Form’) was ‘compensation for lack of faculty’ and, as such, should not be taken into account when assessing household income. He explained that the Income Tax Department did not treat LTIA as an income and it was not taxable. He felt that it was very unfair that the Education Department chose to regard LTIA as part of a household’s gross income.
- (iv) Mr. A. emphasized that the definition of income in the Education (Discretionary Grants – General) (Jersey) Order 2008, was the person’s profits, gains, salaries, fees, wages and perquisites of any kind arising from any source, whether in Jersey or elsewhere, and argued that the inclusion of the word ‘gains’ meant that this wasn’t really a definition of income, as it would include both capital and revenue items. It was suggested that, according to this definition, any gain on the sale of one’s house would be construed as income. It was confirmed by the Senior Finance Manager that, in practice, the sale of a principal residence would not be considered in this respect by the Education Department.
- (v) Mr. A. referenced the guidance notes issued by the Education Department in respect of higher education awards. Section 6, which related to the parental contribution, read, *inter alia* –

“For the purpose of the award gross income is considered to be income from all sources as used for income tax purposes, except that gross amounts are used in the case of income on which tax has already been paid.”.

On the basis that LTIA was not considered for income tax purposes, Mr. A. stated that the Education Department should not take it into account for the purpose of the award of a grant.

- (vi) The Senior Finance Manager notified the Board that the Education Department took all income from Social Security into account when deciding a grant and that Mr. A. (Junior) was not the only student whose parents’ LTIA had been taken to form part of the household income.

5. Closing remarks by the Chairman

The Chairman thanked the Complainants and the representatives of the Education Department for their time and contributions, and indicated that a report of the Hearing would be prepared in due course, which would be circulated to both parties for their input on the factual content. The findings of the Board would subsequently be appended thereto.

6. The Board’s findings

- (i) The Board accepts that when the Education Department decided not to award Mr. A. (Junior) a maintenance grant at Band 4, it applied the system that it was operating in a consistent and fair manner and did not discriminate against him. Another student, applying for a grant in respect of the same course, would have been placed in the same Band 3 as was Mr. A. (Junior).
- (ii) The Board has, however, had considerable difficulty in reconciling the system that the Department was applying (and continues to apply) within the provisions of the Education (Discretionary Grants – General) (Jersey) Order 2008 and the Amounts Order. Under the Amounts Order, the position (as at the time relevant to the present complaint) appears absolutely clear: a student is entitled to receive a maintenance grant where the degree course for which he, or she, is enrolled falls within one of the 4 specified Bands, with Band 1 being the default Band; Band 2 exclusively for paramedical courses; Band 3 exclusively for courses at Buckingham University, and Band 4 for medical courses, where there is a significant period of the course taken up with clinical placement.
- (iii) The Amounts Order does not give the Department any discretion. If a course falls within the description appropriate to a particular Band, then that is the Band that will determine the level of maintenance grant.

- (iv) On the face of the unequivocal terms of the Amounts Order, there should have been no difficulty in applying it to the determination of Mr. A. (Junior)'s application, as he was enrolled on a paramedical course, so Band 2 should have applied. However, the system applied by the Department, in considering maintenance grant applications, did not apply the Amounts Order literally, but sought, instead, to apply the underlying reasoning behind the difference in the Bands, namely that the courses referred to in each Band were of different durations in an academic year. So, a course of approximately 35 weeks per academic year would fall under Band 1, while the courses in Bands 2, 3 and 4 were of progressively longer duration and therefore warranted an increased maintenance grant. The logic and, indeed, the fairness of that principle is accepted by the Board, and the Board furthermore accepts that the Department has assiduously endeavoured to apply its interpretation of the Amounts Order fairly and consistently.
- (v) The difficulty that the Board has, is that it has been unable to find any basis upon which the Department has been able to re-interpret the Amounts Order. There is nothing in that Order which suggests that the amount of a maintenance grant should relate directly and exclusively to the duration of the academic year of a given course, even though that might have been the '*raison d'être*' of the Bands, and nothing in the Amounts Order suggests that the Department has a discretion to treat a course, which clearly falls within one Band, as being more appropriately dealt with in another, however fair and equitable it may be to do so.
- (vi) The officers of the Department were completely frank and open in their admission that the sole criterion for determining the appropriate Band for a given course was the duration of its academic year. The Board accepts that, for the sake of ease of administration and general fairness amongst applicants, it may not be unreasonable to adopt this simple and simplistic approach in awarding maintenance grants, even though (or perhaps because) it takes no account of the limitless variables between the maintenance cost for one student as against another, whether that be regional cost of living, cost and availability of public transport, or whatever.
- (vii) The fact remains, however, that the Amounts Order says one thing, and the Department applies something quite different. In the case of Mr. A. (Junior), he received a maintenance grant assessed under Band 3, which is reserved exclusively for students enrolled on a course at the University of Buckingham. The fact that Mr. A. (Junior)'s course may have been of the same duration as a Buckingham course and thus longer in terms of weeks per academic year than a Band 2 paramedical course, may have justified a higher grant; but the Board is absolutely certain in its view that where a Department considers that a statutory instrument, which determines its behaviour, is in some way ill-conceived, unworkable, or inequitable, it is not for the Department to ignore that instrument and apply its own alternative. Rather, it should bring the relevant inadequacy of the Order, Regulations, or Law to the

attention of the Minister having charge of the Department and press for the appropriate statutory amendment.

- (viii) Quite apart from the fact that, in theory at least, the relevant Order has been through the full democratic process and adopted by the States and it should, therefore, be respected and implemented as enacted until repealed, or amended, by the same democratic process, the Public should be able safely to assume that the Laws and Regulations, as published, are the rules that will be applied; not some more convenient interpretation of them.
- (ix) While the Board considers that the Department was at fault in the manner in which it applied the Amounts Order, it does not feel that it can uphold the complaint. First, the Board is satisfied that the Department had applied its own system fairly and even-handedly, and secondly that Mr. A. (Junior) actually benefitted against a strict application of the Amounts Order (by which he should undoubtedly have been restricted to a grant under Band 2). The Board does not accept the Complainants' argument that their son's course comprised a sufficient degree of 'placement' to warrant that course being regarded as falling within Band 4. The Board is satisfied that placements under Band 4 required a student, as part of the course, having to take a placement outside and beyond the scope of the duration of the academic year of the course, which was not the case (or at least not materially the case) for Mr. A. (Junior).
- (x) Accordingly, the Board does not consider that the complaint can be upheld under Article 9(2) of the Administrative Decisions (Review) (Jersey) Law 1982. It does not deem the Department's actions to have been –
 - (a) contrary to law to the detriment of the Complainants, or their son, albeit that the Department did not, in the view of the Board, discharge its obligations under the 2008 Order correctly;
 - (b) unjust, oppressive or improperly discriminatory, or, in accordance with a provision of any enactment or practice which is, or might be unjust, oppressive or improperly discriminatory;
 - (c) based wholly, or partly, on a mistake of law, or fact, to the extent that the Complainants were in any way prejudiced;
 - (d) such that they could not have been made by a reasonable body of persons after proper consideration of all the facts; or
 - (e) contrary to the generally accepted principles of natural justice.

- (xi) However, the Board is strongly of the view that the information provided by the Department to the Public is unclear and ambiguous. Whilst the Department feels that it has now gone some way towards addressing this confusion, by amending the Amounts Order in 2017, the Board is of the opinion that the revised version is not much clearer than the original Order, although it is pleased to note that the ‘random’ reference to the University of Buckingham has now been removed.
- (xii) If, as it appears, it is the Department’s policy to award maintenance grants solely on the length of the course in each academic year, the Board feels that this should be absolutely clear, both in the legislation and in any guidance issued for students. The Departmental officers sought to suggest that with some 1,500 students receiving maintenance grants at any given time, it would be overwhelmingly time-consuming for the Department to have to identify the duration of each academic year of each course on which those students were enrolled. The Department sought to suggest that the courses were of different durations each year; that students didn’t necessarily attend for the full academic year, and generally that it would be far too onerous for the Department to depart from its present system, which it regards as transparent, simple to operate and fair and equitable for the applicants.
- (xiii) The Board does not accept that argument. First, the Department must determine the duration of any academic year, in order to apply the appropriate Band. Whether the student will actually be in attendance for every week of the academic year is presumably irrelevant to the Department in determining the level of maintenance grant. As the Department stated in evidence, the only criterion used in assessing the gross level of grant is the number of weeks of the academic year of the course. It should not, therefore, be too difficult to amend the Amounts Order to state that the maintenance grant will be based on a set weekly amount, multiplied by the stated number of weeks of the academic year of the course. In the event that a course prospectus does not specify the number of weeks comprised in its academic year, then a default duration could be applied.
- (xiv) The Board is critical of the Department’s lack of policy in respect of the application of Article 16A of the Education (Discretionary Grants – General) (Jersey) Order 2008, which relates to field trip allowances. Article 16A clearly envisages that persons in receipt of a maintenance grant may be faced with extraordinary expenditure arising out of essential travel, or placements, which might fall outside the anticipated cost of the student’s course. The Article’s heading refers to ‘Field trips’ but is specifically targeted at any sort of placement, or study, at a location other than the institution where the degree course is based.
- (xv) The Department representatives appeared to have no knowledge of the relevant Article and considered that its application would give rise to an overwhelming amount of applications for the reimbursement of expenses which would, more properly, be considered to be reasonably anticipated costs of the particular course. The fact remains, however, that the facility to recover expenses for field trips is specifically

provided for by statute, and the Board considers that not only should the Department have established clear and reasonable parameters under which such expenses might be recovered, but that such parameters should be brought clearly to the attention of all students in receipt of a maintenance grant. The Board is disappointed that, in correspondence with the Complainants, the Department had expressly stated that there was no facility for the recovery of extraordinary expenditure, when Article 16A expressly provides for exactly that. Had such clear parameters been in place, when Mr. A. (Junior) was undertaking his placements, then he may, perhaps, have been able to submit a viable claim under Article 16A. The Board accepts that Article 16A could invite a flood of expense claims, but a clearly-stated policy should leave students in no doubt that the Article is to be applied only in respect of extraordinary and significant expenses.

- (xvi) With regard to the separate complaint in respect of the taking into account of LTIA payments, the Board suggests that representatives from the Education Department, Social Security Department and Income Tax Department should enter into a dialogue with a view to the same approach being taken in each Department when deciding how to class such payments. If the same approach is not to be taken (and there is no reason, necessarily, why it should) then the Department should make clear the difference, for example between taxable income and income that will be taken into account in relation to grant applications.
- (xvii) Although it does not uphold the complaint under the Administrative Decisions (Review) (Jersey) Law 1982, the Board recommends that the Education Department reviews the suggestions made in its findings, and asks for a response within 2 calendar months of the publication of its Report, outlining what steps, if any, it has chosen to make in the light of the Board's comments.

Signed and dated by –

G. Crill, Chairman Dated:

G. Marett Dated:

S. Cuming Dated: