Commission on Gangs and Violence

"Working together for safer and stronger communities"



west midlands police and crime commissioner

Strategic Police and Crime Board 17 December 2019 Annex 1

Theme & Recommendations	Recommend ation Lead	Progress and Key Actions	Next steps, key contacts
Leadership /Governance R1 The Gangs and Violence Commission is to provide ongoing leadership, direction and co-ordination to work that will reduce the impact of gangs and violence, working to fill the current leadership vacuum	Derek Webley	 Progress Update: Terms of Reference and Governance Structure have been established. Implementation Group Away Day established the structure. Key actions in the short term were for Thematic Leads to arrange working group sessions from October to November with key stakeholders to inform the development of the commissioning specification for early 2019. A Community Engagement Group has now been established and will meet bi-monthly, with the next meeting scheduled to take place in August. This group will discuss progress of recommendations and will assist the Community Facilitators and Community Development workers in building resilience and strong partnership working amongst those community groups working to tackle Gangs and Violence. The Gangs and Violence Commission meets regularly on a quarterly basis and is well-attended by key strategic partners. 	 Current government arrangements consist of: Full Commission Meeting Meets quarterly to discuss progress of 24 recommendations, brings issues and items for consideration. Senior, strategic meeting attended by all responsible partners, community representatives, PCC and DPCC. This update report is presented at each meeting demonstrating milestones hit and areas of concern. Next Steps: Continue frequency and coordination of meetings. Community Engagement Group Meeting Meets bi-monthly. This meeting relates specifically to the community development recommendation and provides an opportunity for the internal G&V team to be updated on progress of work undertaken by Community Development workers.

Public Health & Data R2,3,7,	Carver Anderson	The focus will be to develop a multi-disciplinary partnership that will work across the city and examine types of violence and look to address the links between violence in the home and on the street. At its heart is the aim of	A Symposium is being organised by Carver Anderson for April 2020.
The Gangs and Violence Commission will work with a range of partners to collate and analyse data about gangs and violence.		better understanding the risk factors in a person's early life that can lead to serious violence by using data from health, criminal justice and other public services. It will also focus on improved and sped up interventions at a local level, with the aim of reducing violence and protecting those vulnerable to exploitation.	This work is also being progressed through the VRU - specific delivery strands include a Mapping and Gapping exercise for current assets in the region relating to violence prevention.
The Gangs and Violence Commission will agree a broad preventative public health based action		Public health approach mindmap Progress Update:	In addition VRU has undertaken a Serious Violence Problem Profile which seeks to identify and describe in detail those risk/protective factors which contribute towards violence.
plan for addressing gangs and violence, recognising that enforcement does not offer enduring solutions.		 Other key activities to inform this work include~ Commission to explore partnerships arrangements with Birmingham City Plan 2018-2022 and Commonwealth Games <u>https://www.birmingham.gov.uk/info/20054/planning_strategies_and</u> 	Current Injury Surveillance System in operation has fed into this and will be developed as this work progresses to improve consistency and accuracy of data.
Our understanding of		 <u>policies/298/big_city_plan</u> https://www.birmingham2022.com/#about-the-bid 	Next Steps:
gangs and violence locally must be underpinned by a sustained academic research programme.			Policy Lead to feed in and maintain links with VRU data analyst and policy lead to ensure Gangs and Violence kept abreast of updates.
Place Based Activity R4 & 13 The action plan will	Alethea Fuller	Targeted diversionary activities and interventions for young people were commissioned across six of our hotspot areas across Birmingham during the summer.	There are currently 26 providers operating in Birmingham as part of this fund up until the end of the financial year.
include targeted, place-based activity Commission partners should prioritise		Gangs and Violence Fund (£350,000 with an additional £100,000 from Early Youth Intervention Fund) launched November 5 at BVSC , with over 65 representatives in attendance across a broad spectrum of community and voluntary organisations ; Key focus for funding will be	Currently oversight and monitoring of the projects sits with the EIYF Coordinators. The projects are making considerable
supporting			The projects are making considerable

community-led organisations that support children, young people and young adults identified as 'at risk' of gang or violence related behaviours and activities. Such early Interventions have a greater chance of success and should be available to anyone in need.	 Diversionary activities preventing young people from becoming involved in violence in the first place - with an emphasis on early intervention and prevention offering pathways out of violence and the gang culture for young people partnership-working to join up the way local areas respond to gang and other youth violence <u>https://www.westmidlands-pcc.gov.uk/news/news-2018/fund-to-tackle-gangs-and-violence-available/</u> <u>Progress Update:</u> Successful Projects from the Gangs and Violence Commission and Early Intervention Youth Fund were brought together on 6 June to network, share best practice and consider opportunities to collaborate. The session also provided an opportunity to map provision and	headway in engaging and working with at-risk young people. Next Steps: Community Development workers to build on June Networking event and facilitate a providers network who will meet regularly, share best practice and discuss challenges with delivery:
	WMP, OPCC and representatives from the Community are engaged in an extensive mapping of provision. This work is on-going and will inform commissioning of provision going forward. Further work has been commissioned across the Summer and during October half-term covering key hotspot areas. Further details on the numbers of young people accessing	

		services will be shared when collated.	
Community Partnerships & Development R 5, 6, 8,12 The commission should consult with local community-led organisations to support their full involvement in the development of 'local community well-being partnerships' (community, voluntary, faith, statutory and business) in neighbourhoods identified as areas needing interventions relating to gangs and violence.	Nathan Dennis/Bobby Dennis	 Draft proposal developed and Community Development roles will focus on: Develop relationships and networks through a community development approach, with VCSE organisations working with schools, statutory organisations, community groups and residents that are interested in proving preventive and diversionary activities for young people engaged in or at risk of gang activity and violence. Helping organisations to engage with local policy makers and statutory partners Supporting the development of funding proposals and applications either to the OPCC or other sources of relevant funding Help to develop practical organisational skills i.e. project management, financial management, and contracts and grant compliance etc. Producing performance reports monitoring progression against agreed milestones 	Attached is the most recent update from the two Community Development workers: Recommendations Report 9th August 2 The OPCC supports the training course: Community Led Training: Working with Gangs Youth Violence Level 3 Course The delivery of the Working with Gangs and Youth Violence Level 3 Course is an essential tool in helping to reduce the levels of youth violence, including gun and knife related crime, along with the rise in 'county lines' and other forms of child criminal exploitation within the region. By providing quality training for the practitioners that have to work with young people and communities
Commission partners should work to include an 'authentic youth and family voice' in their discussions and planning. This voice can represent the views of victims and perpetrators in		Community Development Co-orc The Commission has also appointed a Community Facilitator who will work with the two Community Development workers, supporting them to access key communities.	that have been affected by gangs and youth violence. The current statistics show an upwards trend toward serious youth violence in the last 3 years within the West Midlands, which demonstrates the urgency for trained and skilled practitioners to be working on this agenda. The course will enable practitioners and

service provision and provide relevant information about 'life on the ground'.			individuals in the community to work with young people in gang impacted environments and those who are at risk of becoming involved in youth violence. The course will address the skills gap that exists amongst organisations, professionals and members of the community around the wider issues of youth violence and understand the contributing factors to young people becoming perpetrators and victims. The course will equip all participants with the skills to have the confidence and to work effectively with young people affected by youth violence to make real and lasting change in their lives by applying learned tools and techniques to overcome their involvement in youth violence Wext Steps: Support workers in establishing and running Capacity Building sessions and a Community of Practice in relation to ACEs.
Offending and Young People R10, 16, 20 The commission	Robin Thompson	Offending/Young People workshop was held on 16 October at Aston Villa FC with over 14 representatives in attendance representing the statutory and community sector.	Tender attached:

partnership should learn from Birmingham Youth Offending Service and consider a roll out of its family- empowerment approach as a template for working with families, with needs linked to the criminal justice system, youth violence and criminality. The Commission will develop, support and review schemes that support young adults at risk and ex- offenders to find work and start businesses. Prisoners associated with gangs and violence should have a comprehensive 'intervention and support package' in place for when they leave prison.		 Key feedback included The commissioning process should consider that any services commissioned should be a family centred approach that focuses on the high risk individual's attitude, behaviour and thinking. A primary focus and aim for any deliver against these recommendations is a community own, community involved principle. However, this may require a targeted training and development package to empower ordinary people from the local community who are new to this area of work, to co-work alongside existing and creditable community base organisation/individuals. The commissioning framework needs to ensure that resources are not simply used to enhance statutory services alone but commission services from the community and voluntary sector that adds values and fills the void that statutory services cannot bridge. Trauma base interventions from within communities or understand the complexities of how serious violence impacts upon the individual, family and wider community was an identified gap in service provision. This would enhance and support reconciliation of peace and a non-violence. Prison service across the West Midlands need to be engaged to determine the following: What's the impact of current rehabilitation services within prisons had upon high risk individuals leaving the prison regime? How does the 7 Pathways resettlement framework involve a community led and community involved services that are rooted within local community involved services that are rooted within local communities? 	Specification of Requirements Reset The rehabilitation project has been awarded to Bringing Hope and Avision as a joint response and will begin in the new year.
Community Mediation R11 A flexible and culturally responsive community based	Alethea Fuller	 Criteria around the Mediation Project: We are looking for a community/voluntary organisation to manage a conflict mediation and intervention project with the appropriate infrastructure to manage the process – independent of statutory providers 	Mediation specification is below.

preventative and reactive mediation and conflict intervention capability is required.		Scope to consider conflict prevention which would include interventions and projects to engage our young people who are gang involved Individual mediation for young people/adults as well as gang mediation There needs to be accredited training for mediators. There will be a need to ensure that trained mediators have experience of working with gang members, or those affected by gangs. Also need mediators who are role models within the community so there is a group and mediators are chosen appropriate to the circumstances Paid mediators/ Referral mechanisms Deployment/Intelligence and information sharing Progress Update: Consultation event held with key stakeholders to inform specification. Work is underway to finalise consultation stage with the service likely to be in place by late-September. Further consultation event took place on the 9 th July in order to finalise specification before tender. Specification complete	Capital Conflict Management are the current providers of Mediation across the West Midlands – work is still taking place to integrate the community side of the project.
School Exclusions R14 The Commission will review approaches to school exclusions, aiming to develop services and support	Nadyia Hussain (Chair)	School Exclusions Roundtable was held on 22 November at Lloyd House with over 20 representatives in attendance representing statutory and community sector. Children who have been permanently excluded from school has risen by 67% since 2012/13 to 7,720. Referrals to children's services where gangs have been identified as a factor rose by 26% between 2015/16 and 2016/17 to 6,570. Key areas of discussion included:	The VRU will lead on this strand of work. VRU/Project Guardian are progressing the request from the PCC to better capture and collate data relating to school exclusions and correlations with crime and violence. This has necessitated the request from WMP to

for excluded pupils and their families.	 Quality of Alternative provisions Specialist provision for SEMH Post 16 Central accountability/direction, QA provision effectiveness pupils 	responsible education authorities across the WM.
	needs	Next Steps:
	 1% of pupils AP get 5 good GCSE, 99% do not Lack of support for parents when decision making Off Rolling - Progress 8 Census date Developing the sharing of good practice between schools, as there are some Beacon examples. Few Schools beginning to adopt whole school emotional awareness in their approach and practice. SEMH beginning to become recognised and underpinning our understanding of young people. 	VRU will support work strands relating to school engagement including the Mentors in Violence Prevention Programme and roll-out of Partnership Engagement Manager. These both seek to reduce exclusions as early as possible.
	Education Round Table Commission o	Managed move work strand shows a real gap in current service provision both in terms of delivery and understanding of scale and pinch points. This needs further exploration.
	Progress Update:	
	 Continue discussions with key stakeholders/partnerships including City Council; Titan Partnerships and Birmingham Education Partnership re exploring funding options and pilot projects. Funding agreed for County Lines Training Event for schools (£8000)– March (Alethea and Tom M are aware) Carry out an audit of best practice/innovation across country by March 2019 of initiatives tackling social exclusion. Visits to be arranged for Nadyia including St Georges Academy to discuss best practice AF to meet Nadyia to discuss key milestones during February/March 	
	 School Exclusions and Off-rolling The Commissioner is working with the Children's Commissioner to address the impact of exclusions and off-rolling on youth violence through 	

		 Please see letter attached at Annex 2, signed by PCC David Jamieson, PCC Jane Kennedy (Merseyside), PCC Mark Burns-Williamson OBE (West Yorkshire), PCC Kathryn Holloway (Bedfordshire) and PCC David Munro (Surrey) Exclusion Letter Annex 2,pdf The PCC is working closely with WMP to access better data relating to serious violence offences and any links to absenteeism from education. Data will be used to inform commissioning of services and future partnership working with schools and other agencies. Following publication of the Timpson Review on School exclusions the PCC will be meeting with the National Schools Commissioner, Dominic Herrington on the 10th July to consider the report, its implications and work required to improve outcomes for young people in the West Midlands. PCC will be holding a further event to focus on vulnerable young people, and the risks of exploitation and criminality, with a particular focus on care leavers and those excluded from school. 	
Police Cadets R15 The new Police Cadet	Ashley Bertie	Our Cadets scheme was launched during November 2017. The scheme has successfully recruited over 150 young people aged 13-17 year olds, and will eventually operate across the Force, with 500 more cadets recruited by May 2020. The focus is provide young people with a greater sense of community, inclusion and purpose. The aim is to build self-esteem and	Progress of Cadets Unit being managed via Polly Reed and POD within WMP. Next Steps:

scheme must engage young people in areas most affected by gangs and violence	develop leadership skills which will set them up for future employment. The link to the progress report on Cadets that went to the Strategic Police and Crime Board in on September 18 can be found <u>here.</u>	
	The OPCC met with representatives from West Midlands Police's Citizens in Policing Team in early November to take forward discussions on how the Cadets scheme must engage with the young people in the hot spot areas.	Increase sponsorship offer as part of CSR engagement with businesses.
	Key discussion areas included:	Assist with volunteer recruitment via external stakeholder engagement.
	 Challenges/Risks Recruitment of approx. 25% of young people who are at risk/vulnerable Recruitment of Cadet leaders from the force – time off etc Waiting list of candidates from schools Time for vetting and DBS 	
	Progress Update: OPCC Early 2019 contribute to strategic planning	
	processes for roll out of Cadets Extending reach to the south of the city and hot spot areas	
	Stronger partnerships with faith communities and support awareness raising of cadets	
	Drawing in external funding to support work of cadets via sponsorship	
	OPCC in partnership with Citizens in Policing Team take	

		forward discussions with faith communities re raising awareness	
Mentoring R17 Mentoring schemes should be targeted at young people at most risk. Commission partners should support the appointment of the Partnership Engagement Manager to develop school-based mentoring schemes to support young people 'at risk' of exclusion/offending and in need of greater support. The engagement and consultation with local community groups will is necessary for this role.	Alethea Fuller	 Scope for the Mentoring provision includes: a) A range of mentoring provision and interventions b) Available across Birmingham but targeting our 6 hotspot areas (Aston, Winson Green/Ladywood, Erdington, Small Heath, Northfield/Longbridge, Alum Rock) c) Targeting 14-18 year olds, but available 11-24 year olds d) Promote sustained access by the young person to education, training or employment e) Support the needs of young people by delivering the service flexibly on weekdays, evenings and weekends (some group work may be undertaken as part of an agreed Individual Support Plan). f) Support the development of personal strategies and practical support systems to enable young people to disengage from gang activity and involvement in violent crimes. g) Based on outcomes for young people Progress Update: Partnership Engagement Manager continues mentoring/partnerships work across schools during 2019 Mentoring specification is being developed – to be informed by providers. 	

		There is a consideration of post-16 business mentoring support which would support young people into employment, skills and training.	
Specialist Family Provision R 18 The Commission will support development of specialist family and trauma therapy services for those affected by gang associated violence.	Alethea Fuller	 Feedback from Away Day included the key areas for delivery : An accessible service that is brought to the communities they serve, Services should use a restorative approach to tackling father absence. Information resources empowering and informing parents available on various platforms. One to one support available by home visits and community-based surgeries. Information on trauma and Child Criminal Exploitation available for families to improve understanding and should be available in multiply mediums and platforms. The service should work with the families in creating safety plans. CCE screening tools should be used are to identify children at risk. 	The Ephiphany People CIC are delivering the CARTHASIS project for family intervention work Ephiphany People CARTHARSIS.docx
Young People R19 Birmingham City Council should engage partners in a review of services for young people.	Dan Gordon	 Currently Birmingham City Council youth provision is based around 17 youth centres across the City. The two youth Centre hubs are Lighthouse (Aston) and Factory (Longbridge); They both provide a multitude of activities and opportunities for young people (aged 10-25), from weekly youth club programmers and events to a range of services and support that young people may require. Progress Update Meeting with Head of Youth Services, Birmingham City Council youth services during early December to discuss key issues, identifying gaps in provision and longer term collaboration with the youth service Roundtable with Youth workers took place to explore key local drivers for violence Analyse data from Youth Promise -on- going 	 On-going partnership working with Youth Services incl production of leaflets and flyers relating to knife crime with links to knife bin locations. On the 13th June PCC co-produced a Youth Fest event held in East Birmingham which provided information on safety and enrichment activities for 300 young people. PCC supported and endorsed Youth Service bid into the Youth Endowment Fund, and has supported activity over the Summer period. On-going dialogue with Youth Service in relation to key areas of work e.g. weapons

		 BCC to provide youth services usage data On-going partnership working with Youth Services incl production of leaflets and flyers relating to knife crime with links to knife bin locations. On the 13th June PCC co-produced a Youth Fest event held in East Birmingham which provided information on safety and enrichment activities for 300 young people. PCC supported and endorsed Youth Service bid into the Youth Endowment Fund, and has supported activity over the Summer/October/February holiday period. On-going dialogue with Youth Service in relation to key area of work e.g. weapons surrender bins and youth engagement. OPCC has utilised the Youth Service's venues to host Faith Stakeholder meetings (at Lighthouse) and engages with Youth Workers as part of the Faith work stream. 	surrender bins and youth engagement. OPCC has utilised the Youth Service's venues to host Faith Stakeholder meetings (at Lighthouse) and engages with Youth Workers as part of the Faith work stream. Next Steps: Consider how current linkages with Youth Service can be expanded upon. PCC has supported Youth Service via diversionary funding and in regards events. A consideration of the assets they currently hold required.
Faith Based approaches R21 The Commission's action plan should include exploration and review of faith- based approaches to gangs and violence.	Carver Anderson	 Faith Roundtable held on 5th November at Lloyd House with over 14 representatives in attendance representing the City's faiths. The key strategic link to ensure we are fully engaged with the Councils Community Cohesion Strategy. Including The focus be pooling our collective assets, expertise and experiences to develop targeted local solutions to the complex issues that undermine community cohesion. Establish a city-wide network and knowledge so that ideas and information can be shared across neighbourhoods. We will work with partners at all levels to ensure that the benefits of economic growth are shared and accessible to all. We will empower communities to be active participants in local solutions, harnessing the skills and expertise of local people and organisations. We will work with partners at all levels to ensure that the benefits of economic growth are shared and accessible to all. 	It has been difficult to get appropriate representation at forums and meetings. Engagement with black-led Christian/Catholic churches remains strong Multi-faith agenda still lacking despite efforts to broaden out the focus. Current focus of recommendation is to work to establish a Community Chaplaincy Model. This would consist of a network of SPOCs within different faiths and organisations who function as a support network for young people and professionals working in and around gangs and violence. These chaplains would provide an out-reach service in communities and utilise their spaces to convene and engage with young people and therefore the work is ongoing.

		 February 12 - extended roundtable took place - which included the key leaders from local mosques, multi faith networks and African communities. In terms of delivery of a working group under the leadership of Bishop Mike Royal has been considering, amongst other elements, the potential value of designing and developing culturally relevant and up-to-date training tool kits that helps assist and add value to multi-faith networks. The key longer term to ensure voices are heard across all diverse communities. Initial faith steering group established and met for the first time in June. Membership of this group to be finalised, and ongoing meetings with key stakeholders around this agenda to continue. Reached out to Birmingham Council of Faith to arrange a meeting. This has been scheduled with feedback to follow. Engagement with WMP Chaplaincy team to better understand model and to ascertain whether there is scope to replicate in the community to support those affected by Gangs and Violence. 	
Funding R22 There should be	Ian Henshaw	The Fundraising Manager is in post as identified in the recommendations. The PCC has been successful in his bid to the Home Office Early Intervention Youth Fund, securing £1.83million to support projects in	Successful funding applications led by the PCC:

investment in	the West Midlands. The project will disseminate key messages and target	Early Youth Intervention Fund bid was
capability to seek	resources and interventions in local areas most affected by violence and	successful November 2018 £1,870,000
greater external	where evidence indicates emerging risk / threats. The overview is available	
funding from	here:	Violence Reduction Unit Fund was successful
charitable and non-		September 2019: £3.370,000
statutory funders		
	EIYF Overview of	
	Application.docx	
	There has been a relaunch of the PCC's Building Blocks Charity to ensure it	
	meets the needs of local young people and also, importantly, attracts further	
	funding that can be used to support local activities. Trustees are now in	
	place who have skills in the following areas: fund raising and bid writing,	
	media and communications, youth services and youth provision. A funding	
	round is currently open with expressions of interest welcomed.	
	Progress Update	
	Big Lottery proposal development/scoping discussions	
	post April 2019, with a view to developing a stakeholder	
	partnership and the proposal being co-produced by young	
	people.	
	Additional funding secured as a result of the work under	
	the Commission from central government. Circa £11m	
	total from their Serious Violence Strategy which will go	
	towards establishing a Violence Reduction Unit and	
	providing a surge in policing activity.	
	providing a surge in policing activity.	
	Youth Endowment Fund and the Anti-Knife Crime Fund	
	now closed with a number of organisations supported by	
	both OPCC endorsements and bid-writing support via	
	BVSC resource. Notification of outcomes expected in	
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		October.	
Business, Employment, Training R23,R24 The commission should establish a community-led 'interdisciplinary business hub' for supporting individuals and families associated with gangs and violence. This hub will show people routes into employment, training, self-employment and business start-up possibilities. The Commission should work with businesses to provide	S	 Employment /Business Roundtable held on 4 October at Aston Villa FC with over 12 stakeholders in attendance : Key discussion areas included: 1. Mapping the regulation and key bodies How do companies give individuals a second chance More awareness of regulatory requirements across the bodies Experience shared from Security industry – SIA the regulatory body and inconsistencies 2. Who owns the Risk More partnerships work required with employers More awareness of good practice Examine thoroughly the barriers to employment for those at risk and ex-offenders Wraparound support for prisoners post release –what is existing provision across the region? Audit of provision? 	Spec attached which will progress this work: Initial Business Proposal v2.docx The service will be commissioned as a pilot through £200k of PCC funding. The current aim is to get proof of concept to then work towards sourcing further funding to scale the programme. Our model is focused on young people, aged 16-25, who are at risk of gang crime and/or violent behaviour. Secondly, young people can be supported into work and also into business through business support and a grant. Our model is the only model that has combined the IPS model with an entrepreneurial element – providing young people with 121 support for a 12 month period either into work or into business.
spaces for activity, training, mentoring and advice for individuals and families associated with or impacted by gangs and violence.	Business Leaders Roundtable to take forward discussions with key local and national business took place April 2019 Further discussions with partners including Business in the Community/Chamber of Commerce develop a plan to connect with the City's Business Leaders/influencers	this area: People Plus, Birmingham Children's Trust, Thrive Into Work, WMCA, Probation, several current IPS providers, and NHS Dudley CCG. All have said that this will be a positive intervention for the young people we are aiming to support. WMP are sighted on the project, with the Head of Force Intelligence and the Diversion and Intervention Lead for Project Guardian	

Ensuring the Commission has a strategic fit with The Big City Plan; a 20-year City Centre Masterplan. It's a vision to encourage and support Birmingham's continuing transformation into a world class city Centre. OPCC and G&V Commission members attend regular Employment Steering Group hosted by the WMCA to consider linkages and blockages to the agenda relating to young people and employment. Consideration being given to the adaption or development of this recommendation to provide floating on-going and bespoke support for a number of identified individuals at- risk of being affected by issues relating to gangs and violence.	 lending support for the project. A rough specification has been written (above) which needs unpacking further. Where we're going: We still need to unpack the referral mechanisms into the project and the specific group within the cohort we are wanting to support with this project. We have meetings booked in with Ronald Winch, Lead Policing Lecturer for BCU, to unpack our evaluation for the project. Meetings are planned with WMP's academic leads, Jenny Richards and Gill Wall, to discuss the project and hopefully develop a logic model. Design of the specification will be developed on a co-produced basis in a session facilitated by the PCC's Fundraising Manager. This session will involve a lived experience expert, the APCC, and OPCC, VRU, the G&V Commission area lead and APCC After these steps we will be in a position to commission out to a provider or a consortium of providers. Current aims are for the provider(s) to be in place before April 2020.