

CHILDREN'S SERVICES WORKFORCE DEVELOPMENT FRAMEWORK 2022-2025

'A workforce that cares and is cared for'



Content

1. **Foreword**
 2. **Introduction**
 - 2.1 Covid-19
 3. **Joining Up the Dots**
 - 3.1 A Whole Systems Approach
 - 3.2 Family Safeguarding
 - 3.3 Integrated Care System [ICS]
 - 3.4 Cambridgeshire and Peterborough
 - 3.5 Peterborough
 - 3.6 Cambridgeshire
 4. **Children's Services Values, Vision and Strategic Principles**
 - 4.1 Values
 - 4.2 For children and young people to be safe.
 - 4.3 We are the best corporate parents we can be.
 - 4.4 We know our service well so that we can improve all the time.
 5. **Workforce Development - Where are we Now?**
 - 5.1 National Context
 - 5.2 Local Context
 - 5.3 Where do we Want to Be?
 - 5.4 Workforce Stability: Agency Vs Permanent Staff
 6. **Workforce Development Priorities**
 - 6.1 Equality, Diversity, and Inclusion
 - 6.2 Recruitment
 - 6.3 Retention
 - 6.4 Workforce Development
 - 6.5 Workforce Engagement
 - 6.6 Organisational Culture, Values and Behaviours
 - 6.7 Partnership Working
 7. **Success Measure**
 - 7.1 Key Strategic Targets and Performance Indicators
 - 7.2 Success Measures
 8. **Governance and Accountability**
 9. **Support & Resources**
-

1 Foreword

Cambridgeshire and Peterborough Children and their families should have confidence in turning to professionals like you for help and for the help and protection you provide to be timely, enduring, flexible and thoughtful. You have the skills, knowledge and experience to help children, young people and their families to build their resilience and community connections and empower them to find their own solutions to problems.

We want children and their families to work with professionals like you to quickly reduce immediate risks and work out long-term strategies for changing their lives more fundamentally. We want you to support families to think through the impact of what happens now and to be made central to planning the future together.

We know that you and your colleagues are our most valuable asset to achieve this vision, uniquely placed to help transform the lives of vulnerable children, young people and their families. In order to create the conditions for keeping children and young people safe, promoting their welfare and enabling them to fulfil their potential, we need highly skilled and experienced people like you to create a stable workforce and committed to making a difference.

This framework sets out our commitment to you and our expectations of the Children's Social Care workforce; it provides the strategic framework for workforce development and sets out our immediate priorities. The scope of this framework covers all staff within Children's Social Care.

2 Introduction

In order to sustain improvement in services for children and young people and avoid what Ofsted describes as "start-again" social work, achieving stability in our Children's Social Care workforce is vital. It underpins everything we are trying to do to improve the lives of Cambridgeshire and Peterborough's most vulnerable children.

A stable and effective workforce builds knowledge and expertise and improves practice quality through long-term individual and group learning tailored to workers' particular needs. It develops an excellent knowledge of the local area and the challenges that children, young people and families face. Children and young people benefit from workers who know them well, and who can develop trusted long-term relationships with them and with their families.

The challenge of recruitment and retention of social workers in certain teams and areas is significant. Although there had been progress made in recruitment and retention, Ofsted reports show that this has been a challenge for some time. This ambitious workforce development framework and plan is needed to bring together the actions being taken regarding recruitment, pay and reward, training, growing "our own", retention and succession planning.

2.1 Impact of Covid-19

We are proud of how we have responded to the pandemic over the last 2 years. Our staff have remained wholly committed to delivering improved outcomes and safeguarding our most vulnerable children and young people. It is anticipated however that the impact of Covid-19, significant increases to the cost of living, and the effect of the invasion of Ukraine, will all continue to impact the most vulnerable for many months (if not longer),

adding to the already challenging set of circumstances facing our communities and workforce. All services working within Children's Services face a momentous task to support children, young people and their families through these difficult months and years ahead.

The last two years have taught us a lot, including that how we work is changing and we need to ensure that the Council is able to respond to the different demands that children, young people and their families will come to expect. Alongside this are changes that are needed to make sure that our workforce is involved and engaged and that we are all proud of our impact across Cambridgeshire and Peterborough.

3 A Joined-Up Approach

3.1 Whole Systems Approach

This framework builds upon our corporate, people, equality, commercial and digital strategies to describe a whole systems approach. This joined-up approach is needed to resource, attract, deploy, develop and retain our workforce to ensure that we can deliver our current and future priority outcomes, and to remain flexible enough to deal with the levels of change that have become a norm within local government.

We will reflect upon current or recent recruitment projects to make sure there is no duplication, we avoid silo working and making the most of existing resources / platforms.

3.2 Family Safeguarding

We will also continue to mitigate against pressures affecting our service and workforce on a number of fronts, including reducing demand where it is safe to do so, and smart care planning, both being key to our response. We remain committed to supporting children to remain within their families. We do so by applying the practice model of Family Safeguarding (FSM), a whole family approach to child protection, providing help and support they need from different professionals working as one team.

3.3 Integrated Care System [ICS]

This framework creates a comprehensive and ambitious vision for our workforce over the next 3 years. This work also forms an important stage in our journey towards developing seamless services for children, young people, and their families through the development of an Integrated Care System [ICS] across both Councils.

3.4 Cambridgeshire and Peterborough

We will continue our journey to work closely across the two Councils, exploring opportunities to share structures, policies, practices, and resources. This will inevitably lead us to embrace new ways of working, adopting new mind-sets and developing new skills and behaviours. We will have the opportunity to work alongside different colleagues, learning from each other and helping to make a real difference within the two Councils.

3.5 Peterborough

Peterborough is one of the fastest growing cities in the UK. There are 200,000 residents in Peterborough alone with a 12.5% population growth expected by 2050. The city is

delivering a billion-pound regeneration programme and boasts unrivalled transport links and exciting plans for growth. It is a base for growing families with over 40% of our population aged under 16.

The population in Peterborough is truly diverse and includes several sizeable communities from Central and Eastern Europe. This diversity is reflected in the children and young people in care population.

3.6 Cambridgeshire

Cambridgeshire has an overall estimated population of 595,700. Huntingdonshire and South Cambridgeshire are the most populous districts in the county and East Cambridgeshire is the least populous.

Cambridgeshire is a relatively prosperous county. Cambridgeshire children generally have above average health, educational attainment, and life chances. However, there are pockets within the county where deprivation levels exceed or equal the national average, most particularly in parts of Wisbech, Huntingdon North and the northeast of Cambridge City.

4 Children’s Services Values, Vision and Strategic Principles

Achieving the aims of this framework will help to achieve our overarching vision and strategic principles for Children’s Services and the overall Council priorities and vision. These are:

4.1 Vision and Values

Children’s Services: Our Vision	Children and young people are at the heart of everything we do.	High quality, child-centred and effective services.
<p>We believe that delivering Children’s Services well has the potential to transform the lives of children, young people and their families across Cambridgeshire and Peterborough. We are committed to reducing inequalities and providing high quality support to families makes an important contribution to achieving that aim.</p>	<p>We will listen to children and young people’s views and feelings and understand the impact on them and their family. Children and their families will tell their story once. We will involve them in all planning and decision making.</p>	<p>We will work with children, young people and their families to recognise and build on their strengths. We will help them develop the skills to solve problems and overcome challenges. We will provide the right intervention at the right time and in the right way.</p>

Reflective and responsive to change. 3	Working with families. 4	Making a difference. 5	Services around children and families. 6
<p>Our services reflect and respond to the changing needs of Cambridgeshire and Peterborough's diverse population of children and young people.</p>	<p>We will work with children, young people and their families to understand their needs and develop holistic support. We want our children to be brought up in loving, happy, healthy and safe homes where their needs are met.</p>	<p>We will provide support that is informed by the latest research and evidence of what works best for children and young people. We will be clear about outcomes and impact on children.</p>	<p>We support children and young people to live at home wherever possible; when this is not possible our ambition is to enable them to live in or near their family in the most appropriate caring home.</p>
Effective Early Help. 7	Mature partnerships. 8	Committed workforce. 9	High performing. 10
<p>We will not wait before problems become unmanageable before we offer help, and we recognise that support might come from a number of different places. We will build the capacity of communities to support their members, create local networks of professionals who work together, and target our support to meet the different needs of individual places.</p>	<p>Our partnerships are mature, trusting and effective and work is always focused on achieving the best outcomes for children and young people.</p>	<p>We will ensure that our workforce is stable and that staff are skilled, highly motivated, well supported and have opportunities for personal development. Staff will feel supported to make decisions, assess and hold risk and to develop creative and innovative solutions. This will ensure that we deliver excellent services to children and young people.</p>	<p>The outcomes we achieve for children and young people compare favourably with high performing local authorities. We make an active contribution to Cambridgeshire and Peterborough's ambition of achieving the best start in life for our children and young people.</p>

4.2 Strategic Principles

4.2.1 For children and young people to be safe.

Early Help services are integral to avoiding poor outcomes. Children, young people, and their families are at the heart of everything we do. The entire Children's Services workforce at Peterborough City and Cambridgeshire County Council is focused on ensuring the best possible outcomes for those we support, particularly those most vulnerable and disadvantaged children and families. We want children to live with their families and attend local schools in their communities. This means supporting families so children can live with them whenever possible safely. Where this is not possible, alternative arrangements should be found locally and looking further afield only when in the best interests of the child.

4.2.2 We are the best corporate parents we can be.

We understand that not all young people are the same, but they do all deserve outstanding services. A strong ethos of corporate parenting means that sense of vision and responsibility towards the children we look after and those with care experience is a priority for everyone. All children need love and stability to thrive. A strong corporate parenting ethos means that everyone, from the Chief Executive down to front-line staff,

as well as elected Council members, are concerned about our children in and leaving care as if they were their own. This is evidenced by an embedded culture where Council officers do all that is possible to ensure the Council is the best parent it can be to the child or young person.

4.2.3 **We know our service well so that we can improve all the time.**

We believe that we are all responsible for knowing and understanding the quality and impact of our practice. Leaders, managers, and staff at all levels must understand a child's experience of our services so that we challenge practice and improve all the time. That is why we are constantly striving to know ourselves better, what is working and what we need to change to make these improvements.

5 **Workforce Development – Where are we now?**

5.1 **National context**

The well-publicised national shortage of social workers, in particular experienced social workers, has presented a challenge for many Local Authorities, including Cambridgeshire and Peterborough.

The current context for recruitment of qualified social workers is an extremely challenging one nationwide. Due to a lack of centralised planning, challenges in relation to valuing the role especially of children's workers and now the long-term impact of the pandemic, there is a chronic shortage of effective, experienced workers in the field. To give a sense of the scale of the problem, there were 32,502¹ registered children's QSWs in England in 2021.

In the same year, 4,995 left the profession nationally – an increase of 16% on the previous year and the highest recorded figure since comparable records began. There are now 6,522 vacancies for permanent workers across the country, a 7% increase on the year before. Although agency worker registrations have also increased, they only amounted to 5,977 workers, creating a shortfall of 545 posts. This is not evenly spread across the country.

5.2 **Local Context**

Social Care Establishment and Agency Staffing – May 2022

	Social Worker establishment	% filled by permanent staff	% filled by Agency workers	% unfilled posts
Cambridgeshire	120	56%	40%	26%
Peterborough	64	80%	6%	9%

The table above details a worrying picture concerning the percentage of posts filled by non-permanent agency social workers and completely vacant posts.

¹ [Children's social work workforce, Reporting Year 2021 – Explore education statistics – GOV.UK \(explore-education-statistics.service.gov.uk\)](https://www.service.gov.uk/explore-education-statistics)

The data changes from month to month but, given the latest figures and the trend for some time, it is right to say that Cambridgeshire are consistently experiencing the most challenging circumstances in terms of high agency workers.

The delivery of Children's Services is at a critical point with more than 70% of posts unfilled in some front-line teams [for example, at the time of writing this framework, the Cambridgeshire Fenland and East Assessment Team has 6 out of 8 posts unfilled]. The situation is most acute in both Family Safeguarding, and Assessment but there are significant problems in Corporate Parenting Teams as well. The difficulties stem back several years but have become increasingly challenging since last summer. This represents a serious risk for any local authority, both in terms of service delivery and evaluation by the regulator.

The following two initiatives have been implemented for some time in Peterborough to aid recruitment and retention but only recently in Cambridgeshire. These initiatives will be reviewed to ensure they remain fit for purpose:

- Retention payments
- Progression scheme

In addition, the following initiatives have also been implemented in Cambridgeshire in response to the acute difficulties being faced.

- Agreed exemptions from the Eastern Region Agency Memorandum of Co-operation
- Special arrangement with a sector leading agency to provide staff and now a project team in the Assessment Service
- New recruitment campaign launched November 2021

Historically, we have also recruited from overseas with a campaign to Southern Africa and we recruit Newly Qualified Social Workers each year. We have various routes into Social Work including apprenticeships, sponsorships, Step Up to Social Work, and encourage student placements.

5.3 **Where do we Want to Be?**

Our goal is to achieve stability and consistently high-performance in the social care workforce. This means staff seeing their long-term future in Cambridgeshire and Peterborough, with consistently low turnover of staff at team level and the majority of workers staying with their team for a minimum of 36 months before considering a move to another part of the service.

5.4 **Workforce Stability: Agency Vs Permanent Staff**

A high proportion of agency workers does not necessarily indicate workforce instability. Agency workers provide a valuable contribution to the work in their teams. However, they are expensive in comparison to permanent workers, their tenure is often short, and the nature of their role lends them to be specialists in short-term, intensive case work which does not foster long-term relationships with children, young people, and families. Our goal, therefore, is to get to a point where we are only employing agency social workers to cover relatively short periods of absence such as maternity or sick leave. Our target is to ensure that the level of agency cover amounts to no more than 10% of the Social Care workforce at any point.

6 Workforce Development Priorities

A workforce that cares and is cared for is key to delivering quality services to children and families when they need it most. To ensure we have a valued, confident, competent and professional workforce, we have identified seven strategic priority areas as part of the workforce development framework, along with the outcomes we want to see for each priority.

These priorities have been designed in conjunction with managers and employees across the service and, alongside the accompanying action plan, they will help achieve our ambitions for the service.



6.1 Priority One: Equality, Diversity and Inclusion

“Our workforce represents and respects our diverse communities.”

We need a workforce that is representative of the communities we serve and make our working environment a place where everyone feels welcomed and valued. We need to develop a culturally competent workforce, who are able to work effectively and inclusively with children, young people and families from all backgrounds. As we look into the existing workforce, we see that we do not have a good representation from minority communities. We consistently employ high numbers of women across the service with good representation for women throughout the structure. To be representative of our communities we will need to develop more pro-active recruitment processes and introduce succession planning taking into account our balance of representation to ensure we are reflecting the wider diverse society to model for the children and young people and families we work with.

6.2 Priority Two: Recruitment

“Cambridgeshire & Peterborough are great places to practice as a social worker.”

Recruitment of experienced staff who can deliver the best possible services to children, young people and families is essential for us to provide good outcomes for our children. A significant problem nationally is the recruitment and retention of social workers within Children’s Services. We are addressing these issues with a number of initiatives, such

as Grow Our Own, expanding our ASYE programmes, and we have launched a new permanent campaign *Join Us Feel Valued*. There are a number of workstreams to address these issues captured in the workforce development action plan.

6.3 **Priority Three: Retention**

“Our social workers stay and build their careers in Cambridgeshire & Peterborough.”

Retaining our highly skilled workforce is critical so that we can create stability within the workforce and for children and families. We acknowledge that working with children and families can sometimes be a hard job and we need to provide ways to care for our workforce. We will look to ‘what works’ to support time to self-care and uncover organisational barriers that get in the way of our colleagues being the best they can be. We need to understand why we have high staff turnover in parts of the service to ensure that we implement the right things to stabilise the workforce. We will identify our critical posts in Children’s & Safeguarding and develop colleagues to take on these senior roles – particularly Senior Practitioners who will need to be ready for the next step of Team Manager in our succession managerial talent pool. We are reviewing our Leadership & Development programme and we will look to develop specific training linking aspiration and succession. Alongside this, we are tailoring our corporate flexible working offer to the needs of the service.

6.4 **Priority Four: Workforce Development**

“Our workforce grows with us.”

Creating a culture of learning that builds our workforce’s ability to manage and deal with future challenges is vital to provide the best services and reflects our practice-based learning culture. We need to support our colleagues to renew skills at pace, as best practice is constantly emerging. We would like learning opportunities to become more integrated within the working day, with colleagues taking ownership of their own development to enable a more agile, flexible and adaptable workforce. With our workforce development opportunities, we hope to support better engagement and retention, reduce staff turnover and have happier and more fulfilled colleagues. We need to ensure we respond to learning needs identified through the Ofsted Action Plan, practice audits, Serious Case Reviews and Serious/Critical Incidents.

6.5 **Priority Five: Workforce Engagement**

“Every colleague matters and our workforce is led by the voice of colleagues.”

We need to further improve engagement, consultation and communication with the Children’s & Safeguarding workforce to fully understand what our colleagues feel is working well, what their worries are and ideas for change, reflecting our strengths-based approach, doing with and not to. We need to increase awareness and understanding of our vision, priorities and principles for Children’s & Safeguarding and there is a commitment to consolidate and refresh these messages. We need to increase the connectivity within and between teams and find new ways of boosting morale. A new Communication Strategy will therefore focus on culture, shared practice and morale through Communication, Connection and Celebration. Both our practitioner and team manager social care forums are growing in strength and influence and we will continue to expand opportunities for engagement across the workforce and wider with the whole organisation.

6.6 **Priority Six: Organisational Culture, Values and Behaviours**

“Our values & behaviours align to the themes of the Corporate People Strategy and are embedded in our day-to-day work.”

We are loyal to our values and use these to help us make decisions, set outcomes, define expectations, prioritise tasks, focus effort and develop our skills and talents. Our culture is defined by our people, our environment, our processes, and ultimately how we support our communities. Our values are central to our culture, driving everything we do. These are currently: Lives Over Services, Collaborative Working, Being Creative and Aspirational & Being Accountable.

6.7 **Priority Seven: Partnership Working**

Our mission is to create a shared responsibility and focus the whole City & County Children’s workforce on common themes that are relevant to all agencies to help develop seamless services that do intervene earlier with better results for every family in need in Cambridgeshire & Peterborough. This is something we cannot achieve alone. We will need to understand the range of professional and specialist contributions and further build mutual respect across all roles, to get the best outcomes for our families.

7 **Success Measures**

Progress and impact will be monitored and assessed against a range of quantitative and qualitative measures that are fully detailed in our Workforce Development Action Plan.

7.1 **Key Strategic Targets and Performance Indicators**

Target	By When	Performance Indicator
% of agency social work qualified staff to 10%.	September 2023	% FTE Agency Social Workers (Team Manager and Below).
Reduce social work qualified staff turnover (permanent staff) to less than 10% per annum.	April 2023	Staff turnover (Rolling 12 months).
Achieve sustained high staff satisfaction and work/life balance.	April 2023	Indicators taken from the annual Social Worker Health Check Survey Budget and Investment.

7.2 **Success Measures**

	Priorities	Outcome
1	Equality, Diversity, and Inclusion	Actively promote, engage with, and monitor the progress of the corporate Equality Diversity and Inclusion outcome for 2022-2023. Encourage diversity amongst our workforce in ways that reflect the population of Peterborough and Cambridgeshire in particular under-represented groups.

<p>2 Recruitment</p>	<p>Attract and recruit high calibre practitioners to ensure a fully resourced, qualified and skilled workforce for meeting the current and future needs of children, young people and their families.</p> <p>Be proactive in our workforce analysis and planning, taking into account regional and National trends, to ensure sufficient flow and stability of high quality and experienced practitioners to meet current and future demand for services.</p> <p>Review and benchmark the Peterborough and Cambridgeshire Children's Social Care workforce offer, to ensure it is compelling, competitive and effectively marketed to encourage high quality practitioners to apply and stay in Peterborough and Cambridgeshire.</p> <p>Social work workforce is stabilised, and the sufficiency of social workers is ensured in the long term.</p>
<p>3 Retention</p>	<p>Retain high quality and experienced practitioners to create a stable, consistent and knowledgeable workforce, which enables the development and maintenance of relationships with children, young people and their families.</p> <p>Turnover of staff and levels of sickness are reduced through fuller understanding of staff motivation and aspiration, leading to a series of targeted actions designed to retain the workforce.</p> <p>There is a clear development pathway and succession planning together with a workforce with the skills and attributes to move into leadership positions.</p> <p>There is a service culture, ethos and values that are clear and support the whole workforce to put children at the heart of all that they do.</p> <p>Succession planning together.</p>
<p>4 Workforce Development</p>	<p>Create clear pathways for development and progression, aligned with competencies, skills and experience.</p> <p>Provide a comprehensive programme of professional development opportunities for all staff, which equips them with the knowledge and skills they need to safeguard and promote the welfare of children and young people.</p> <p>Workforce receives the learning and development needs to effectively meet the demands of the differing roles within Children's Services.</p> <p>Support succession planning by providing learning and development opportunities for aspiring leaders.</p>

	<p>Ensure that those undertaking a management or supervisory role are empowered and given the guidance, support and professional development to become great leaders.</p> <p>Sustain management oversight and the effectiveness of frontline practice so our work with families continues to be good or better.</p>
5 Workforce Engagement	<p>Support the health and wellbeing of practitioners so they can practice effectively and sustainably in an emotionally demanding and potentially stressful environment.</p> <p>Create the conditions for good practice, enabling a focus on direct work with children, young people and their families.</p> <p>Be a reflective and learning organisation, driving continuous improvements in practice and outcomes for children, young people and their families.</p> <p>Leadership is visible and communication is transparent and regular.</p> <p>A workforce where in-depth views are regularly sought, and ideas and opinions form part of shaping the Children's Social Care vision as well as service design.</p>
6 Organisational Culture, Values and Behaviours	<p>To embed the People Strategy, and its core values & behaviours in all that we do.</p>
7 Partnership Working	<p>Develop partnership links to promote innovative practice and contribute to our capacity to provide learning and development opportunities.</p> <p>Promote a culture of working together towards a common goal.</p>

8 Governance and Accountability

8.1 Peterborough and Cambridgeshire

Oversight and challenge will be provided by the Workforce Strategy Group, who will monitor progress against the strategic priorities and the effective and timely delivery of the action plan on a monthly basis.

Operational managers will work closely with the Workforce Development Lead to ensure the action plan is progressing, and regular updates will come to the Children's & Safeguarding Departmental Management Team.

Further scrutiny will be provided by the Recruitment & Retention Board which is chaired by the Executive Director of People & Communities.

8.2 **Cambridgeshire**

A Workforce Programme Board chaired by the Chief Executive Director, meet monthly to oversee the progress, impact and risk of the short-term programme of work. An Operational Delivery Meeting will oversee the delivery of actions within each of the three workstreams (retention, recruitment and workforce supported by communications). The workstream task and finish groups reports into the Operational Delivery Meeting. Further oversight will also be provided by the Corporate People Strategy Board.

9 **Support and Resources**

9.1 **Peterborough and Cambridgeshire**

There has already been significant corporate support in this area and key departments have been working extremely hard on workforce development initiatives for well over two years. External recruitment campaigns have been funded and HR and Comms colleagues have been tenacious in following this through and making as much capital as they can.

A long-term media strategy has been in development in terms of raising our profile and promoting our positive work; there has been investment and development around a new HR system; the recruitment team has worked hard to reduce some of the system issues with a smooth application process and on boarding for roles; and the service has delivered significant amounts of training and support to workers and especially managers. Unfortunately, this has not proved sufficient to address the scale of the problem and so a new concept is proposed.

In terms of value for money, there is a clear incentive to try innovative approaches to recruiting and retaining permanent staff. We are currently employing two agency project teams through projected in year vacancy savings that we have had to significantly incentivise to work in our most under-staffed areas, but this is not sustainable on a long-term basis.

9.2 **Cambridgeshire**

Funding was approved for a 12-month project team to oversee the development and delivery of a comprehensive and detailed council-wide workforce programme, including defining the projects/workstreams, to address the significant challenges with recruitment and retention in Children's Services at present, specifically in relation to qualified social workers.

The Project Team encompasses all the different skill sets required to make a real impact on the recruitment and retention issues and would continue to have close links to their home areas to draw on HR, Learning and Development and Communications expertise and wider Council developments and expectations.

A monthly Programme Board chaired by the Chief Executive was set up in June 2022. A monthly Operational Delivery Meeting will report to the Programme Board and will oversee the delivery of actions within each of the three workstreams (retention, recruitment and workforce supported by communications). The workstream task and finish groups will report into the Operational Delivery Meeting.

We are competing for very scarce resources in a challenging market and are unlikely to be successful unless we can re-position ourselves. An agile and swift response is of the essence due to both the loss of current staff and the expectations of Ofsted, with their next inspection due in the second half of 2022.

DRAFT

This page is intentionally left blank