

# Early Years Inspectorate Regulatory Report

## Pre School

**TUSLA Identifier:** TU2015LK039

**Name of Service:** Castle Creche

**Address of Service:** Coolbawn Meadows, Castleconnell, Co. Limerick.

**Eircode:** V94 Y058

**Name of Registered Provider:** Gillian Costello

**Service type:** Full Day

**Date of Inspection:** 07/07/2023

**No of pre-school children:** AM 20 PM 19

**Address of the Early Years Inspectorate:** Tusla, Early Years Inspectorate,  
Estuary House, Henry St.,  
Limerick

**Inspection undertaken by:** E Browne & F Kelly

**Title:** Early Years Inspectors

### Authority to Inspect

The Tusla Early Years Inspectorate carries out inspections of Early Years Services under Section 58(J) of the Child Care Act 1991 (as inserted by Section 92 of the Child and Family Agency Act 2013).

**Conditions if applicable** Not applicable

## Description of service

This is an early years creche which first opened in July 2008. It is a private service which provides sessional, part-time and full day care to preschool children aged 6 months - 6 years of age.

The service operates from 07.30hrs to 18.00hrs and the setting caters for a maximum of 72 preschool children.

An school aged service is also provided to children attending the local primary school.

## Staffing

The staff roster demonstrated that 15 staff including the registered provider and the manager are employed in the service.

There are 9 staff working with the preschool children and 5 other staff available to work with the school aged children and cover for kitchen duties.

The 9 staff working with the preschool children hold a qualification in early years care and education ranging from level 5 to 8 on the National Qualifications Framework.

## Methodology

Tusla's Early Years Inspectorate is the independent statutory regulator of early years services in Ireland. The Child Care Act 1991 (Early Years Services) Regulations 2016 define the duty of a registered provider to ensure the safety and well-being of children and to comply with these regulations. This Act also gives Tusla the authority to assess compliance with the regulations. The purpose of regulation in relation to early years services is to ensure that the care, safety, and well-being of children attending such services is upheld. Inspections of early years services are planned based on the following:

- Previous inspection history
- Any information received in relation to the service

The findings on inspection are based on:

- Information obtained through examination of documentation
- Direct observation
- Discussion with relevant staff

This inspection was unannounced and focused on the area of governance/ health, welfare and development of child/ safety/ premises and facilities. The inspections may also focus on other areas as required.

The inspection focused on an examination of compliance under regulations 8, 9, 10, 11, 16, 19, 23, 25, 27, 29, and 32.

Inspection findings are documented in the inspection report which is first issued in draft format to the service with an opportunity to respond to any findings. Where statutory requirements are identified as not being met, the registered provider must demonstrate how they have rectified the non-compliance and will prevent any non-compliance from re-occurring. The Corrective Action and Preventive Action plan (CAPA) will be used to inform decisions about compliance with regulatory requirements. Where the registered provider fails to meet the statutory requirements an escalation process may be commenced.

The inspectorate reserves the right to edit responses received for reasons including clarity, completeness and compliance with administrative and legal processes.

The contents of the report are compiled by the inspectorate body.

### Additional Information

This inspection was triggered by information received into the Early Year's Inspectorate.

11/07/2023

An immediate action notice was issued to the registered provider as a person trained in first aid was not available on the premises at all times during the hours of operation. This is outlined in Regulation 25 in the body of the report.

12/07/2023

A response was received from the registered provider stating that all staff would receive updated first aid training on the 13/07/2023.

19/07/2023

A confirmation email was received from the service stating that 10 staff had completed the refresher first aid course.

### Acknowledgments

The inspectors wish to acknowledge the cooperation of the person in charge, staff and children who were present on the day of the inspection.

### Part III – Management and Staff

#### Regulation 9 – Management and recruitment

(1) A registered provider shall ensure that-

- (a) the service has a designated person in charge and a named person who is able to deputise as required,
- (b) at all times during the period when the pre-school service is being carried on, the designated person in charge or the named person referred to in subparagraph (a) is on the premises, and
- (c) there is a clear management structure in the service that identifies the lines of authority and accountability in the service and the specific roles and responsibilities of each employee and unpaid worker.

(2) A registered provider shall ensure that each employee, unpaid worker and contractor is suitable and competent taking into consideration the nature of the needs of children, including by-

- (a) consideration of references from the person's past employers, if any, and in particular the most recent employer, if any,
- (b) consideration of references from reputable sources in the case of a person who has no past employers,
- (c) consideration of the vetting disclosure received from the National Vetting Bureau of the Garda Síochána in accordance with the Act of 2012 in respect of the person, and
- (d) ensuring, insofar as is practicable, that where a person has lived in a state other than the State for a period of longer than 6 consecutive months, he or she provides police vetting from the police authorities in that state.

(4) A registered provider shall ensure that, without prejudice to the generality of paragraph (2) and subject to paragraphs (5) and (6), each employee working directly with children attending the service holds at least a major award in Early childhood Care and Education at Level 5 on the National Qualifications Framework or a qualification deemed by the Minister to be equivalent.

(7) A registered provider shall ensure that all employees, unpaid workers and contractors are appropriately supervised and provided with appropriate information, and where necessary training, including in relation to the following:

- (a) the policies, procedures and statements of the service specified in Schedule 5;
- (b) Part VIIA (inserted by section 92 of the Child and Family Agency Act 2013 (No. 40 of 2013)) of the Act, and
- (c) these Regulations.

#### Compliance Information

(1)(a) The registered provider was the designated person in charge and a named person documented as the manager was able to deputise as required.

(b) The registered provider and the manager were not on the premises when the inspectors arrived at the service and a member of staff identified as the person in charge requested the manager to come to the service. The manager arrived shortly around 10.45 hrs and was available for the duration of the inspection.

(2) All the staff files were checked on the day of the inspection and the following documents were available on file for these staff:

(a) References from the person's past employers and the most recent employer were available for all staff.

(b) References from reputable sources in the case of a person who had no past employers were available where required.

(c) Vetting disclosures received from the National Vetting Bureau of the Garda Síochána in accordance with the Act of 2012 in respect of all staff.

(d) Police vetting was in place for the staff members who had lived in another state for a period of longer than 6 consecutive months.

(4) The 9 staff working with the children in the service had childcare qualifications ranging from level 5 to level 8 on the National Qualifications Framework.

### Non-Compliance Information

(1)(c) While it is acknowledged that on inspection a staff member identified as the person in charge. However, a clear management structure was not documented in the weekly staff roster as who the named person in charge was when the registered provider and the manager were on leave.

(7)

1. There was no documented evidence that the staff recruited since December 2020 had received induction training on policies and procedures including the behaviour management policy and the service statement.

2. There was no written evidence that supervision had taken place by management of any of the staff working in the service.

### Corrective & Preventive Action submitted by the Registered Provider

#### Corrective and Preventive Action

(1)(c) The deputy manager name has been added to the staff roster.

(7)

1. The service will maintain written records of the staff who have received induction training in the services policies and procedures.

2. The service have attached staff appraisal forms from January 2022. These will be done again in the coming weeks. Also attached some documented discussions between management and staff in relation to staff supervision and the outcomes of same.

**Supporting documentation submitted**

Updated policies and procedures for the service and the staff appraisal forms from June 2022.

**Summary Comment**

The action as stated by the registered provider will address the non-compliance identified. This will be reviewed on next inspection.

**Part III – Management and Staff**

**Regulation 10 - Policies, procedures etc. of pre-school service**

*A registered provider of a pre-school service shall ensure that the written policies, procedures and statements specified in Schedule 5 are in place for the service.*

**Compliance Information**

The following policies were documented and available for inspection.

- Behaviour management policy
- Accident and Incident policy
- Complaints policy

**Non-Compliance Information**

The following policies and procedures for the service were viewed and deemed not to meet the regulatory requirement. These policies and procedures were last updated in December 2020.

1. Staff supervision policy did not state the following:

- The objectives, resources required and format of supervision, including induction and ongoing supervision.
- The frequency and duration of supervision.
- What records will be kept for supervision, where the records will be stored and how long they will be kept for.
- The supervision of relevant staff, contractors, or trainees where appropriate.

2. The Healthy Eating policy did not state the following:

- That the menu is displayed in the service, that it includes a wide variety of healthy foods and any foods that are substituted are of equal nutrient value.
- That the main menu must include appropriate servings of protein, starch, dairy, vegetables and iron.
- That parents and guardians' choices are respected.
- Describes how foods is safely stored, prepared and served.
- Details how children are supervised while eating and drinking.

3. Safe Sleep policy did not state the following:

- Describe the procedures in place to ensure a safe, comfortable and supervised sleep environment.
- Describe the facilities for children of all ages.
- Identifies prohibited equipment for sleeping children.
- Sets out the procedures for managing a sleep related emergency.

4. Risk Management policy did not state the following:

- That the risk management assessment strategy will be included in the services safety statement.
- That the risk assessment record must show who is involved in the risk assessment process.
- Set out how long risk management records will be kept.

### Corrective & Preventive Action submitted by the Registered Provider

#### **Corrective and Preventive Action**

The service have updated and amended the following policies and have included all the points to meet the regulatory requirements.

1. Staff supervision policy.
2. Healthy eating policy.
3. Safe Sleep policy.
4. Risk Management policy.

#### **Supporting documentation submitted**

The policies were submitted to the Early Years Inspectorate.

### Summary Comment

The actions as stated by the registered provider will address the non-compliances identified. These will be reviewed on next inspection.

## Part III – Management and Staff

### Regulation 11 - Staffing levels

*(2) Subject to paragraphs (4) and (5), a registered provider of a full day care service or a part-time day care service shall ensure that at all times the minimum ratio of adults to children specified in column (3) of Part 1 of Schedule 6 opposite a particular reference number specified in column (1) of that Part in respect of the age range of the children specified in column (2) thereof at that reference number is satisfied.*

### Compliance Information

(2) On the day of the inspection there were 4 staff working across 3 rooms with 20 pre-school children present in the morning and 3 staff working with 19 preschool children present in the afternoon. The minimum ratio of staff to children were working directly with the children in each room.

- Wobbler Room – there were 3 (1-2) children and 1 staff present.
- Toddler Room - there were 9 (2-3 years) children and 2 staff present.
- Preschool Room - there were 8 (3 – 5 years) children and 1 staff present.

Montessori Room was now being used for the school aged children during the summer months only. There were 12 (5 years to 7 years) school aged children, and 1 childcare staff present in the morning and 15 school aged children present in the afternoon. Three additional staff were available to work in the Montessori room with the school aged children only and one staff was working in the kitchen.

### Part IV – Information and Records

#### Regulation 16 – Record in relation to pre-school service

*(1) A registered provider shall ensure that a record in writing is kept of the following information in relation to the service:*

- (a) the name, position, qualifications and experience of the person in charge and of every other employee, unpaid worker and contractor;*
- (b) details of the class of service and the age profile of children for which the service is registered to provide services;*
- (c) details of the adult: child ratios in the service;*
- (d) the type of care or programme provided in the service;*
- (e) the facilities available;*
- (f) the opening hours and fees;*
- (h) details of attendance by each pre-school child on a daily basis;*
- (i) details of staff rosters on a daily basis;*
- (j) details of any medication administered to a pre-school child attending the service with signed parental consent;*
- (k) details of any accident, injury or incident involving a pre-school child attending the service.*

#### Compliance Information

(1) The registered provider had ensured that a record in writing was kept of the following information in relation to the service:

- (a) The name, position, qualifications and experience of the person in charge and of every other employee, unpaid worker and contractor in the service.
- (b) Details of the class of service and the age profile of children for which the service is registered to provide services.
- (c) Details of the adult: child ratios in the service.
- (d) The type of care or programme provided in the service.
- (e) The facilities available.
- (f) The opening hours and fees.
- (h) Details of attendance by each pre-school child on a daily basis.

#### Non-Compliance Information

(1)(i)

The roster did not give details of the break times of each person in attendance for each day and also did not demonstrate that there was sufficient cover for early arrivals, late collections, sick leave and school runs.

### Corrective & Preventive Action submitted by the Registered Provider

#### Corrective and Preventive Action

(1)(i)

The staff roster is based on the number of children the service have each morning and evening and therefore allows for early arrivals and late collections.

During the summer months the service do not need cover for school runs as school is not open.

#### Supporting documentation submitted

Copy of break roster attached.

#### Summary Comment

The actions as stated by the registered provider will address the non-compliances identified under point (1)(i). These will be reviewed on next inspection.

## Part V - Care of Child in Pre-school Service

### Regulation 19 - Health, welfare and development of child

(1) A registered provider shall, in providing a pre-school service, ensure that-

(a) each child's learning, development and well-being is facilitated within the daily life of the pre-school service through the provision of the appropriate activities, interaction, materials and equipment, having regard to the age and stage of development of the child, and

(b) appropriate and suitable care practices are in place in the pre-school service, having regard to the number of children attending the service and the nature of their needs.

(2) A registered provider shall ensure that no corporal punishment is inflicted on a pre-school child whilst attending the service.

*(3) A registered provider shall ensure that no practices that are disrespectful, degrading, exploitive, intimidating, emotionally or physically harmful or neglectful are carried out in respect of a pre-school child whilst attending the service.*

### Compliance Information

**(1)**

#### Basic Needs:

A healthy eating policy was available, and all meals and snacks were prepared on site by the service.

Each child had their own drinking container for water labelled and placed on a shelf accessible to the children.

Pasta and vegetables sauce was served for dinner and children were offered second helpings.

The older children could access the bathroom at any time throughout the day. The staff supervised children's hand washing and provided assistance when needed. The children's nappies were changed as necessary.

Good personal hygiene practices were observed. Children washed their hands before snack break and after toileting and messy play.

Rest areas were available in each of the playrooms. There were 2 sleep rooms with cots for the children under 2 years and sleep beds in an adjoining room for the older children who required a sleep.

Children had opportunities to move about freely in the playrooms during their free play time.

#### Physical Environment:

This full day care service comprised of 3 playrooms for the preschool children and the Montessori playroom was in use for the school aged children during the summer months, sanitary facilities and separate outdoor play areas located directly off each playroom for all the children. There were age-appropriate play equipment and materials available for the children present on the day.

**(2)**

There was a Behaviour management policy in place for the service. A staff member in the Toddler room was observed to respond appropriately and in a timely manner when a child became upset following an argument with another child over a toy. The staff member was observed to hold and comfort the child and when settled the child returned to playing happily.

(3)  
Staff were observed to speak kindly to the children using soft tone of voice and listened to the children in a caring manner.

No practices that were disrespectful, degrading, exploitive, intimidating, emotionally or physically harmful or neglectful were observed in respect of any pre-school child whilst attending the service.

### Non-Compliance Information

#### Basic Needs:

- (1)
1. The staff in the Toddler playroom were observed to be standing over two children while feeding them in their highchairs for dinner. This did not promote social interaction and good eye contact with staff and children.
  2. The privacy and dignity of the children did not appear to be respected at all times as toileting was in view of other children, the inspector and staff. From the Toddlers playroom a child was observed using a potty with a staff member present as the doors to the lobby and toilet were wedged open.

#### Physical Environment:

Toddler room:

3. Interest areas within the Toddler room were not well planned or resourced. While it is acknowledged that some resources were available, however they were not clearly developed and defined for the children to develop their emerging interests, likes and preferences.
4. Activities were predominately adult led due to the room layout and availability and accessibility of toys. This may impact on children thinking for themselves, promoting independence and extending their learning.
  - There was no library area and books were stored in a container on a high shelf out of the reach of the children.
  - Crayons, paper and play dough were located on shelving that was inaccessible to the children.
  - Many of the musical toys had no batteries for the children's play and development.
  - The imaginative area was not clearly defined and resourced. A basket full of dolls did not have dolls clothes for dress up, props for the kitchen were stored away from the kitchen. The variety and choice of open-ended materials and natural products such as twigs, seashells and stones were not available for the children's imaginative play.
  - There were no sand available for sand play.

## Corrective & Preventive Action submitted by the Registered Provider

### Corrective and Preventive Action

#### **Basic Needs:**

1. Chairs are provided for the staff to sit while feeding the children and all staff in care rooms where highchairs are used has been advised that they must be at the child's level at meal times.
2. Staff have been advised to close the doors to the toileting areas to protect the privacy and dignity of the child. There will always be a staff member with them.

#### **Physical Environment:**

3. The staff members in the Toddler playroom have discussed the layout of their room and they have developed and defined the interest areas.
4. Arts and crafts materials (crayons, play dough, paper etc) are now in a shelving unit that is accessible to the children. All batteries have been replenished and put back into the musical instruments. Library books are also now on a shelf at the children's level. Sand has been replenished.

The layout of the room will be continually monitored as will be the position of equipment and the need for toys/messy play etc. to be replenished regularly.

### Supporting documentation submitted

No

## Summary Comment

The actions as stated by the registered provider will address the non-compliances identified, however no supporting evidence has been submitted to support these actions. These will be reviewed on next inspection.

## Part VI - Safety

### Regulation 23 - Safeguarding health, safety and welfare of child

*A registered provider shall ensure that all reasonable measures are taken to safeguard the health, safety and welfare of a pre-school child attending the service and that the environment of the service is safe.*

#### Compliance Information

##### General Safety:

The service had an appropriate security system in place to protect from any unauthorised access to the building and to prevent children accessing unsafe areas and exiting.

There was an intercom system in place, video coverage at the entrance door and the outdoor areas were walled and gated.

#### Non-Compliance Information

##### General Safety:

1. There were two highchairs in poor condition their covers torn and worn. This posed a safety risk to the children.
2. The kitchen and the staff room were accessible to the preschool children as doors were open and a wedge in place to ensure the doors remained in an open position. This posed a safety risk to the children.

#### Action submitted by the Registered Provider

##### Corrective & Preventive Action

##### General Safety:

1. The highchairs have been removed and replaced by new ones.
2. The kitchen and staff room doors are closed and staff have been asked to ensure the doors are closed at all times .

##### Supporting documentation submitted

No

#### Summary Comment

The actions as stated by the registered provider will address the non-compliances identified, however no evidence has been submitted to support these actions. These will be reviewed on next inspection.

## Part VI - Safety

### Regulation 25 - First aid

*(1) A registered provider shall ensure that a person trained in first aid for children is, at all times, immediately available to the children attending the pre-school service.*

*(2) A registered provider shall ensure that a suitably equipped first aid box for children-*

*(a) is safely stored in an easily accessible and conspicuous position on the premises, and*

*(b) is available to the children attending the pre-school service at all times.*

### Compliance Information

(2)(a) There were suitably equipped first aid boxes available and easily accessible on site in the preschool facility.

(b) The first aid boxes were available to the children attending the pre-school service.

### Non-Compliance Information

(1)  
A person trained in first aid was not available on the premises at all times while children were present in the service.  
Evidence was available to demonstrate that there was no staff member present in the service with first aid training from 07:30 to 08:00 hrs on the 7<sup>th</sup> of July 2023 and there was no staff on duty with First Aid Response training (FAR).  
The staff with FAR was rostered off but arrived at the service at 10:30 hrs and remained on site during the inspection.  
Also the 2 staff trained with FAR were both rostered off on the Friday of each week.  
An immediate action notice was issued to the registered provider on the 10<sup>th</sup> of July requesting immediate action to address this.

### Corrective & Preventive Action submitted by the Registered Provider

#### Corrective and Preventive Action

11/07/2023

A response was received on the 11<sup>th</sup> of July stating that first aid training would be completed on the 13<sup>th</sup> of July.

19/07/2023

The service was contacted by the inspectorate on the 19<sup>th</sup> of July to ensure that the staff had completed the first aid refresher training.

Confirmation email was received from the service stating that 10 staff had completed the refresher first aid course.

14/08/2023

The registered provider was contacted by email to ensure staff trained in first aid response were available to the children at all times on the premises.

A confirmation email on the 4<sup>th</sup> of September from the service stated that there are 9 staff trained in first aid response.

**Supporting documentation submitted:**

No

**Summary Comment**

The actions as stated by the registered provider will address the non-compliances identified. These will be reviewed on next inspection.

**Part VI - Safety**

**Regulation 27 – Supervision**

*A registered provider shall ensure that pre-school children attending the service are supervised at all times.*

**Compliance Information**

The internal layout of all rooms in the service allowed for easy visual supervision of children without intrusion into their quiet space and time. In the outdoor environment the staff on duty ensured that all children were closely supervised while playing in all areas outside. Children were at all times supervised by sight, except at times when for short intervals they were within earshot, e.g. when using the bathroom facilities.

## Part VII - Premises and Space Requirements

### Regulation 29 - Premises

*A registered provider shall ensure that the premises of the service are-*

- (c) kept adequately lit, heated and ventilated*
- (d) cleaned, maintained and repaired, as required, and*
- (e) equipped with adequate and suitable sanitary facilities.*

### Compliance Information

(c) The heating system was off throughout the service and no issues were voiced by staff regarding the maintenance of adequate room temperatures in all areas of the service.

### Non-Compliance Information

- (d)
1. The overhead shelter in the outdoor play areas was dirty with green moss and unkempt.
  2. The wooden houses in the outdoor areas appeared worn with paint chipped and all appeared in need of general maintenance such as painting.
- (e)
3. There were 5 potties inappropriately stored on the floor of the Toddlers sanitary facility and this posed an obstruction for access to the children's toilet, the nappy changing area and the wash handbasin.

### Corrective & Preventive Action submitted by the Registered Provider

#### **Corrective and Preventive Action:**

- (d)
1. The service stated that they have contacted a cleaning contractor at the beginning of the summer in regard to getting the overhead shelter cleaned and is awaiting confirmation on date for the job to be completed. An email on the 4<sup>th</sup> of September confirmed that the overhead shelter has been cleaned.
  2. The service plans to carry out the maintenance work in the coming months.
- (e)
3. A number of the potties have been removed from the lobby and toilet area.

#### **Supporting documentation submitted**

No

### Summary Comment

(d) Point 2 remains non-compliant. The inspectorate contacted the service by email on the 14<sup>th</sup> of August to establish if the cleaning and maintenance work was completed.

An email on the 4<sup>th</sup> of September confirmed that this work has not commenced but is part of the services plan.

(e) Point 1 and 3

The actions as stated by the registered provider will address the non-compliances identified, however no evidence to support these actions has been submitted. These will be reviewed on next inspection.

### Part VIII - Notifications and Complaints

#### Regulation 32 – Complaints

(1) A registered provider shall ensure that the complaints policy of the service specifies-

- (a) the procedure to be followed by a person for the purposes of making a complaint in relation to the service,
- (b) the manner in which such a complaint shall be dealt with, and
- (c) the procedures for keeping a person who makes such a complaint informed of the manner in which it is being dealt with.

(2) A registered provider shall ensure that-

- (a) a record in writing is kept of a complaint made to the provider in respect of the pre-school service, and
- (b) the complaint is duly dealt with in accordance with the provider's complaints policy.

(3) A record in writing referred to in paragraph (2)(a) shall-

- (a) include the nature of the complaint and the manner in which the complaint was dealt with, and
- (b) be open to inspection on the premises by an authorised person.

### Compliance Information

(1) The registered provider had ensured that the complaints policy of the service specified-

- (a) The procedure to be followed by a person for the purposes of making a complaint in relation to the service.
- (b) The manner in which such a complaint shall be dealt with.
- (c) The procedures for keeping a person who makes such a complaint informed of the manner in which it is being dealt with.

## Non-Compliance Information

(2) (a),(b),

(3) (a), (b),

The inspection team were unable to determine if the compliant policy had been followed as no records were available to view.

The manager stated that a concern was received by the registered provider but no details were available for the inspectors to view on the day. These records were held by the registered provider who was on leave.

## Corrective & Preventive Action submitted by the Registered Provider

### Corrective and Preventive Action

(2) (a),(b),

(3) (a), (b),

The services policy is followed in terms of dealing with a complaint. There were no records on site of the complaint mentioned in the report as all documentation which was recorded in line with our complaints policy was with a third party.

In future if there is a complaint a photocopy of all documentation will be kept on site should the documentation be required outside the service.

### Supporting documentation submitted

No

## Summary Comment

The actions as stated by the registered provider will address the non-compliances identified. These will be reviewed on next inspection.

## Part II - Registration and Register

### Regulation 8 - Notification of change in circumstances

*(1) A registered provider of a pre-school service other than a temporary pre-school service shall, subject to paragraph (3), notify the Agency in writing of any proposed change in the details in relation to the pre-school service contained in the register pursuant to section 58C(2) of the Act or Regulation 7(2) at least 60 days before it is proposed that the change would take effect*

### Non-Compliance Information

(1) The childcare service did not notify Tusla, the early years inspectorate of the named person in charge who was responsible for the management of the service when the registered provider and the manager were on leave.

### Corrective & Preventive Action submitted by the Registered Provider

#### **Corrective and Preventive Action**

(1) The change of circumstances was submitted into the registration office on the 10<sup>th</sup> of July with the updated details of the deputy manager.

#### **Supporting documentation submitted**

The change of circumstances was received into the early year's registration office.

### Summary Comment

The evidence submitted was deemed to meet the regulatory requirement of point 1 regulation 8.