

## United Learning: Special Educational Needs and Disability (SEND) Policy for ASHFORD SCHOOL

<b>Context</b>
This policy was developed in consultation with parents/carers, staff and pupils and was drawn up having regard to the following legislation and guidance (in so far as they apply to the school) : <ul style="list-style-type: none"> <li>• The SEND Code of Practice: 0-25 years – 2015</li> <li>• Part 3 of the Children and Families Act 2014 and associated regulations</li> <li>• Equality Act 2010</li> <li>• Statutory framework for the early years foundation stage (April 2017)</li> </ul>
<b>Headteacher: Mr Michael Hall</b>
<b>Governor with responsibility for SEND: Paul Freemont</b>
<b>SENCO: Sharon Thompson (SS), Alison Thomas (Prep), Harriet Stone (Nurseries)</b>
<b>SENCO Qualifications:</b> NASENCO (2014) SENCO is a member of SLT
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<b>This policy will be reviewed annually</b>
<b>Agreed by Governing Body: October 2021</b>
<b>Review date: September 2022</b>

This policy is in line with our teaching and learning policy and equality of opportunity policy and aims to support inclusion for all of our pupils. The responsibility for the management of this policy falls to the Headteacher, the day-to-day operation of the policy is the responsibility of the Special Educational Needs Co-ordinator (SENCO). The Governing Body, the Headteacher and the SENCO will work closely to ensure that this policy is working effectively.

This policy should be read in conjunction with the School's Equal Opportunities and Accessibility Plan.

### Rationale

The United Learning Trust ('the Trust') is committed to ensuring that the necessary provision is made for every pupil within their schools' communities in line with this policy. The Trust celebrates the inclusive nature of their schools and strives to meet the needs of all pupils with a special educational need and/or disability.

High quality teaching which is differentiated to meet the needs of the majority of pupils is the first response to supporting pupils with SEN. Some pupils will need something **additional to** and **different from** that which is ordinarily available for the majority of pupils, this is *special educational provision* and the pupils in receipt of this provision are classified as *SEN Support*.

Ashford School will adhere to the principle that 'every teacher is a teacher of SEN' and will use its best endeavours to ensure that the necessary provision is made for any pupil who has SEN and/or a disability. The School will ensure that all staff are able to identify where a pupil may require additional support so that appropriate steps can be taken with the aim of enabling them to partake in all activities in the School in order to reach their full potential.

This policy aims to support all members of staff in providing a framework of support and advice and is based on the underlying principle that we believe:

***Every teacher is responsible and accountable for the progress and development of all pupils in their class even where pupils access support from teaching assistants or specialist staff.***

Teaching and supporting pupils with SEN and/or a disability is therefore a whole school responsibility requiring a whole school response. In order to achieve this we will work in partnership with parents/carers, pupils, local authorities, specialist providers and other external agencies required to meet the individual needs of our pupils.

## **Aims and Objectives**

### **Aim**

To provide an inclusive, stimulating and safe environment which will enhance the learning of all pupils and help them achieve, to their full potential, in all areas including their development of knowledge, skills and understanding to equip them for the next phase of their education, employment or training. By doing this we hope to raise the aspirations and expectations of all pupils, especially those with SEN and/or disabilities.

### **Objectives**

This policy works towards eliminating disadvantages for pupils with SEN and/or disabilities by:

- identifying and providing for pupils who have special educational needs and regularly assess and review the provision that we offer.
- using our best endeavours to ensure that a pupil with SEN and/or a disability (including those with medical conditions) gets the support they need to access the School's educational provision and are able to engage as fully as practicable in the activities of the School alongside pupils who do not have a SEN and/or disability.
- having regard to the statutory guidance the SEND Code of Practice (2015), in so far as it applies to the School.
- operating a 'whole pupil, whole school' approach to the management and provision of support for special educational needs.
- implementing a graduated approach to meeting the needs of pupils identifies as SEN Support.
- appointing a teacher responsible for the coordination of SEN provision (SENCO) and ensure they have the relevant training and qualification to undertake the role.
- providing training, support and advice for all staff as often as is appropriate and necessary.
- ensuring that all students with SEN are offered full access to a broad, balanced and appropriate mainstream that sets high expectations for every pupil whatever their prior attainment.
- working in partnership with parents/carers to enable them to make an active, empowered and informed contribution to their child's education.
- taking the views, wishes and feelings of the young person into account (in light of their age and understanding), and involve them as fully as possible in decision making about their own education.
- working collaboratively with external agencies and specialists including those from Social Care and Health.
- ensuring compliance with the School's Equality Act 2010 duties and not treating disabled pupils less favourably than their peers and making reasonable adjustments so that disabled pupils are not put at a substantial disadvantage in matters of admission and education.

- in conjunction with the Medical Policy, making arrangements to support pupils with medical conditions and where applicable, to have regard to statutory guidance supporting pupils with medical conditions.
- supporting pupils with medical conditions.
- having regard to any other guidance issued by the United Learning Trust.

### **Special Educational Needs**

A child or young person has SEN if they have a learning difficulty or disability which calls for special educational provision to be made for him or her. In accordance with the Children and Families Act 2014, a child of compulsory school age or a young person has a learning difficulty or disability if he or she:

- Has a significantly greater difficulty in learning than the majority of others of the same age, or
- Has a disability which prevents or hinders him or her from making use of facilities generally available in a mainstream school; or
- Are under five years old and would be likely to have such difficulties if special educational provision were not made for them

Children will not be regarded as having a learning difficulty solely because the language or form of language of their home is different from the language in which they will be taught.

The SEND Code of Practice (2015) identifies four key areas of SEND:

- Communication and Interaction
- Cognition and Learning
- Social, mental and emotional health
- Sensory and/or physical

These four broad areas give an overview of the range of needs that are planned for, but we identify the needs of the whole pupil in order to establish what provision is required to meet their primary need, not just by the category in which they are placed. Ashford School will take into account pupils' needs in all four key areas and make appropriate provision, including where this does not impact on cognition and learning.

### **Definition of disability**

A child or young person is disabled if they have a physical or mental impairment which has a substantial and long-term adverse effect on their ability to carry out normal day-to-day activities (as defined by the Equality Act 2010).

It is important to note that a pupil who has a disability may not necessarily have a specific educational need. Not all disabled pupils have SEN.

### **Identifying and supporting pupils with SEN and disabilities**

The Ashford School's curriculum, plan and schemes of work take proper account of the needs of all pupils, including those with SEN and disabilities.

The progress made by all pupils is regularly monitored and reviewed as part of high quality, differentiated teaching. Where concerns are raised about a pupil's progress or if they fall behind their peers, additional support will be provided under the guidance of the class teacher. This information will be shared with parents as and when appropriate, for example at parents' evening.

Where concerns are raised about a pupil's progress, despite support and high-quality teaching, the class teacher will seek advice from the SENCO. Slow progress and low attainment will not automatically mean a pupil has SEN. However, where the School reasonably considers that a pupil may have a learning difficulty, for example where there are early indicators that a pupil is not making expected progress, the School will do all that it reasonable to support and consult with the parents and pupil as appropriate, to help determine the action required, including whether any additional support is needed, such as in-class support.

The School may recommend engaging external agencies and professionals to help assess the pupil's needs and advise on appropriate support. Where parents wish to request a formal assessment from outside of school, they should ensure the School is given copies of all advice and reports received.

Where a pupil is identified as having SEN, or there are significant emerging concerns, the SENCO and the class teacher will take action to support effective learning by removing any barriers and put effective special educational provision in place taking into account any advice from specialists. This SEN support will take the form of a four-part cycle through which earlier decisions and actions are revisited, refined and revised with a growing understanding of the pupil's needs and what supports the pupil in making good progress and securing good outcomes. This is known as the graduated approach – assess, plan, do, review.

Parents should always be consulted and kept informed of any action taken to help their child, and of the outcome of this action. Due weight will also be given to a pupil's wishes (according to their age, maturity and capability). Parents will be notified where their child is receiving SEN Support and the School will share with them the provision that is being put in place. This will be regularly reviewed including termly (three times per year) with the parents, the child and teacher at Pupil Progress Meetings.

### **The Graduated Approach to SEND**

**Assess:** In identifying a pupil as needing SEN support the class teacher, working with the SENCO, should carry out a clear analysis of the pupil's needs. This should draw on:

- the teacher's assessment and experience of the pupil, their previous progress and attainment, as well as information gathered from other areas of the school.
- the pupil's development in comparison to their peers and national data should also be considered along with the parent's views and experience, the pupil's views and, if relevant, advice from external support services.

This assessment will be reviewed regularly to ensure support and intervention are matched to need, barriers to learning are identified and overcome so that a clear picture of the interventions put in place and their impact is developed. With some areas of SEN, the most reliable method of developing a more accurate picture of need will be the way in which the pupil responds to an intervention.

If not already done so the School may, in consultation with parents, engage external agencies and professionals to help assess the child's needs and advise on any support needed. Any specialist advice received will usually be discussed with the child's parents.

**Plan:** Parents/carers, with their child, will meet with the class teacher and the SENCO to decide on the interventions and support to be put in place as well as the expected impact on progress and development. A clear plan will be produced. The date for review will depend on the level of need present but will be a least once per term.

The plan will clearly identify the areas of needs, the desired outcomes, the support and resources provided, including any teaching strategies or approaches that are required and when the review will take place. A copy of the plan will be given to parents/carers and the child if appropriate.

The support and intervention provided will be selected to meet the outcomes identified for the pupil, based on reliable evidence of effectiveness and will be provided by staff with appropriate skills and knowledge.

**Do:** The class teacher remains responsible for working with the pupil on a daily basis and will work closely with any teaching assistants or specialist staff involved, to plan and assess the impact of the targeted plan of support and interventions and how they can be linked to classroom teaching.

The SENCO will support the class teacher in the further assessment of the pupil's needs, in problem solving and advising on the effective implementation of support.

**Review:** The review will take place on the date previously agreed to decide if any changes to the support are required. This review will evaluate the impact and quality of the support and interventions in light of the pupil's progress and development and include the views of the pupil (as appropriate) and their parents/carers.

Parents/carers will be given information about the impact of the support and interventions provided, enabling them to be involved with planning the next steps. Where appropriate other agencies will be asked to contribute to this review.

This review will feedback into the analysis of the pupil's needs, then the class teacher, working with the SENCO, will revise the support in light of the pupil's progress and development, with decisions on any changes made in consultation with the parents/carers and the pupil.

Where there is a sustained period of insufficient or no progress, the School may decide to gain involvement and advice from a specialist or external agency. The School will consult with parents/carers before involving a specialist or external agency.

When a pupil has made sufficient progress in their area of need that they no longer require any provision that is different from or additional to that which is normally available as part of high quality and differentiated teaching they will no longer be seen as requiring SEN Support. At this point, through discussion and agreement with parents/carers the pupil will be removed from the School's SEN register.

The School recognises that some pupils with a SEN may also have a disability and the School will do all that is reasonable in order to meet the needs of pupils with disabilities.

### **SEN Provision**

The provision offered to pupils requiring SEN Support will differ from pupil to pupil. A list of non-exhaustive examples include:

- an individual learning programme (Targeted Plan or Education Plan)
- evidence based interventions (Numicon, Nessy Reading and Spelling, Toe-by-Toe etc.)
- additional support from another adult
- different materials, resources or equipment

- working within a small group
- use of alternative technologies
- peer-to-peer support
- personal care support
- access to resource base, nurture room
- use of therapies (e.g. Drawing and Talking therapy)

### **Statutory Assessment of Needs (EHC Plan)**

A small number of pupils whose needs are complex and long term, may require a greater level of support than the School can provide from its own resources. For these pupils all the evidence from the graduated approach process will be gathered and a request made to the local authority to conduct an Education, Health and Care Needs Assessment. This may result in an Education, Health and Care Plan being provided. Ashford School will follow their local authority's guidance for this process and involve parents/carers and the child from the beginning. The School will always consult with parents before exercising this right to ask the local authority to make an assessment.

If the local authority refuses to make an assessment, parents have a right of appeal to the First-tier Tribunal (Health, Education and Social Care Chamber). The School does not have this right of appeal.

Where a prospective pupil has an EHC Plan, the School will consult with the parents and the local authority (where appropriate) to ensure that the provision specified in the EHC Plan can be delivered by the School. Any additional services that are needed to meet the requirements of the EHC Plan may need to be charged, either directly to the parent or to the local authority if the local authority is responsible for the fees and the School is named in the EHC Plan. In all other circumstances charges may be made directly to parents, subject to the School's obligations under the Equality Act 2010.

### **Education Health Care Plans**

There are a small number of pupils in our school who currently have EHC Plans. The School co-operates with the local authority to ensure that relevant annual reviews of EHC plans are carried out as required.

### **Monitoring and Evaluation of SEND**

Regular monitoring of the quality of provision for all pupils, including those with SEN and/or disabilities, follows the School's assessment and monitoring calendar. In addition, the cycle of Assess, Plan, Do and Review ensures that pupils with SEN and/or disabilities have their individual provision reviewed regularly, at least termly. Additional training, advice and support will be provided to teaching staff where necessary in order to facilitate pupil progress and to meet pupil needs.

Pupil progress is tracked half-termly and where pupils are not making sufficient progress additional information is sought and appropriate action taken, as set out in this policy.

### **Supporting Pupils and Families**

We value and accept the positive role and contribution parents/carers can make. We make every effort to work in full co-operation with them, recognising and respecting their roles and responsibilities. Parents/carers are encouraged to work with the school and other professionals to ensure that their child's needs are identified properly and met as early as possible.

In order that they play an active part in their child's development, the School endeavours to provide parents/carers with the relevant information so they can reinforce learning in the home.

At Ashford School we endeavour to support parents/carers so that they are able to:

- Feel fully supported and taken seriously should they raise a concern about their child.
- Recognise and fulfil their responsibilities and play an active and valued role in their child's education.
- Understand procedures and documentation.
- Make their views known about how their child is educated.
- Have access to information, advice and support during assessment and any related decision-making process about special educational provision.
- Parents/carers of a child with SEN support will have the opportunity to meet with the class teacher at least 3 times a year formally. The SENCO is happy to meet with parents/carers, without prior arrangement, whenever possible.

### **Children in Care**

When a child is in care, the carers are accorded the same rights and responsibilities as parents.

### **Pupil Voice**

We hold the views of pupils highly and recognise the importance of gaining genuine pupil views in promoting the best pupil outcomes. Pupils are able to share their views in a number of different ways (appropriate to age, understanding and ability).

These views are welcome at any time but are specifically sought as part of their annual review, as part of their Pupil Progress Meetings and at the end of a targeted intervention. We ask all pupils to contribute to the setting of their own targets.

### **Partnership with External Agencies**

The School is supported by a wide range of different agencies and teams.

### **Roles and Responsibilities**

Provision for pupils with special educational needs is a matter for the School as a whole. In addition to the Governing Body, Head Teacher and SENCO, all members of staff have important responsibilities.

### **Governing Body**

The Governing Body is responsible for determining school policy and provision for pupils with SEN and disabilities. The Governing Body will ensure that the School:

- Uses its best endeavours to make sure that a pupil with SEN gets the support they need – this means doing everything they can to meet children and young people's Special Educational Needs.
- Ensures that children and young people with SEN engage in the activities of the school alongside pupils who do not have SEN.
- Designates a teacher to be responsible for co-ordinating SEN provision – the SEN co-ordinator, or SENCO.
- Informs parents/carers when they are making special educational provision for a child.
- Ensures that the School's educational provision (including in relation to admissions) prevents disabled children from being treated less favourably than others
- Has an Accessibility Plan showing how they plan to improve access progressively over time.

### **The Headteacher**

The Headteacher has responsibility for the day-to-day management of all aspects of the School's work, including provision for pupils with special educational needs and/or disabilities. The Headteacher will keep the Governing Body fully informed on Special Educational Needs matters and the implementation of this policy in practice. The Headteacher will work closely with the SENCO and the Governor with responsibility for SEND.

In collaboration with the Headteacher and governing body, the SENCO determines the strategic development of the SEND policy and provision with the ultimate aim of raising the achievement of pupils with SEND.

### **The SENCO**

The SENCO takes day-to-day responsibility for the operation of the SEND policy and co-ordinates the provision for individual pupils, working closely with staff, parents/carers and external agencies. The SENCO provides relevant professional guidance to colleagues with the aim of securing high-quality teaching for pupils with special educational needs and/or disabilities.

Through analysis and assessment of pupils' needs, and by monitoring the quality of teaching and standards of pupils' achievements and target setting, the SENCO develops effective ways of overcoming barriers to learning and sustaining effective teaching.

The SENCO liaises and collaborates with class teachers so that learning for all children is given equal priority.

The principal responsibilities for the SENCO include:

- Overseeing the day-to-day operation of the SEND policy.
- Co-ordinating provision for children with SEN and/or disabilities (including those who have EHC Plans) and reporting on progress.
- Advising on the graduated approach to providing SEN support – Assess, Plan, Do, Review.
- Advising on the deployment of the School's delegated budget and other resources to meet pupils' needs effectively.
- Monitoring relevant SEN CPD for all staff and ensuring all staff understand their responsibilities to children with SEN and/or disabilities and the School's approach to identifying and meeting need.
- Managing the Inclusion team.
- Overseeing the records of all pupils with SEN and/or disabilities and ensuring they are up to date and that teachers are given necessary information relating to a child's learning support needs and/or disabilities so that teaching practices are appropriate.
- Liaising with parents/carers of children with special educational needs.
- Contributing to the in-service training of staff.
- Being a point of contact with external agencies, especially the local authority and its support services.
- Liaising with early years providers, other schools, educational psychologists, health and social care professionals and independent or voluntary bodies as appropriate.
- Liaising with potential next providers of education to ensure a pupil and their parents/carers are informed about options and a smooth transition is planned.
- Monitoring the impact of interventions provided for pupils with SEND.
- To lead on the development of high quality SEND provision as an integral part of the school improvement plan.
- Working with the Headteacher and the School governors to ensure that the School meets its responsibilities under the Equality Act (2010), including with regard to reasonable adjustments and access arrangements.



## **All Teaching and Non-Teaching Staff**

- All staff are aware of the school's SEND policy and the procedures for identifying, assessing and making provision for pupils with special educational needs and/or disabilities.
- Class teachers are fully involved in providing high quality teaching, differentiated for individual pupils. This includes reviewing and, where necessary, improving, their understanding of strategies to identify and support vulnerable pupils and their knowledge of the SEN most frequently encountered.
- Class teachers are responsible for the progress and development of all pupils including those with SEN and/or disabilities.
- Class teachers are responsible for setting suitable learning challenges and facilitating effective special educational provision in response to pupils' diverse needs in order to remove potential barriers to learning. This process should include working with the SENCO to carry out a clear analysis of pupil needs, drawing on the teacher's assessment and experience of the pupil as well as previous progress and attainment
- Class teachers will ensure that any pupil on SEN Support is provided with the required support as outlined in the graduated approach plan and clearly identifies this provision on their class lesson plans for every lesson
- Teaching assistants will liaise with the class teacher and SENCO on planning, on pupil response and on progress in order to contribute effectively to the graduated response.

## **Training and Development**

Training needs are identified in response to the needs of all pupils. We have a number of staff with specific training in literacy and numeracy interventions, Motor skill interventions. We have two fully trained counsellors and a Health centre with 4 trained Nurses across the two sites.

The whole school attends SEND training relevant to their area, led by the SENCO who is regularly available to offer support and advice to all staff.

All members of teaching staff meet with the SENCO every half term to discuss the progress of pupils and the support and provision that is being offered.

The School offers opportunities for staff to reflect on their practice and to offer peer-to-peer support and guidance.

## **Recording, Storing and Managing Information**

The School will record the progress of and any support for pupils with significant learning difficulties or disabilities or where they have an Education Health Care Plan. This will be recorded by way of an Individual Education Plan/ Targeted Plan. Each pupil on the SEN register has a SEND report in the form of a Pupil Passport. This is drawn up in consultation with the pupil's teacher, the SENCO, the pupil and their parents and kept on ISAMS.

The Individual Education Plan/Targeted Plan and Pupil Passport may be amended as and when circumstances change and at the request of the pupil, parent, teacher, or SENCO.

The pupil (subject to their age and understanding), together with their parents and teachers, review the plan regularly and the child is encouraged to take ownership of it and to set their own targets.

The School monitors progress of all pupils in the Early Years Foundation Stage ('EYFS'). The designated teacher responsible for coordinating SEN provision in the EYFS provision is Harriet Stone. Harriet Stone will discuss with parents any concerns they may have about a pupil's needs and/or progress, in accordance with this policy.

Pupil records and SEN information may be shared on a "need to know" basis with relevant staff working closely with SEN pupils to enable them to better meet the individual pupil's needs.

Pupil SEN files are kept securely in a locked filing cabinet in the SENCO's office and all electronic information is stored securely and confidentially on the school information management system in the appropriate SEN Pupil file in compliance with our School Systems and Data Storage Policy.

### **Complaints**

The School will listen to any concerns expressed by parents about their child's development and any concerns raised by children themselves. Parents must notify their child's form teacher or the SENCO if their child's progress or behaviour gives cause for concern.

Any concerns or complaints about the School's provision or organisation of SEND are managed in accordance with the School's Complaints Policy.

Parents/carers have the right to appeal certain decisions about their child's special needs made by their Local Authority. Such an appeal is made to the SEND Tribunal. A decision made by a school cannot be appealed to the SEND Tribunal.

### **Admissions**

The School will treat every application from an SEN and disabled pupil in a fair, open-minded way. The School will always consider its obligations under the Equality Act 2010.

The School is academically selective and welcomes all children who can make the most of the opportunities offered and can flourish in its caring environment. The School's Admissions Policy aims to eliminate from the admissions process, as far as possible, any substantial disadvantages which may be encountered by applicants with disabilities. The School will assess all pupils for admission on the basis of its standard selection criteria from time to time. The School endeavours to ensure that it is able to fully support the needs of all prospective pupils. Parents of children with disabilities, SEN or learning difficulties are advised to discuss their child's requirements with the School before the School considers the application for a place and before they sit the School's entrance exam so that adequate provision can be made for them on the day. Parents are asked to provide a copy of a medical report or educational psychologist's report to support a request, for example, for large print material, extra time, use of laptops or other special arrangements. Before an offer of a place is made, the School will assess whether it is able to adequately cater for and meet any SEN and disabilities (if known) through discussion and meetings with parents, consideration of any professional reports and references from previous schools, assessment of the pupil at a taster day, as appropriate. An offer of a place may not be made if the School determines, following consultation with parents, that they are unable to meet and provide for a child's needs. The School will always consider its obligations under the Equality Act 2010.

### **Transition Arrangements**

Support for pupils with SEN includes the planning and preparation at key transitional phases of education. For students arriving at Ashford School we have a comprehensive package of transitional support that is put in. This includes:

- Transition days
- Visits between SENCOs
- Key staff exchange
- Orientation days

### **Bullying and behavioural issues**

All pupils are taught that any form of discrimination, bullying and harassment is prohibited and will not be tolerated. Pupils are taught through the curriculum and PSHE the importance of respecting each other and behaving towards each other with kindness, courtesy and consideration. The School's behaviour and anti-bullying policies make clear the seriousness of bullying, victimisation and harassment and those appropriate sanctions will be applied to any pupil who displays inappropriate behaviour.

The School recognises that disabled pupils or those with SEN may be particularly vulnerable to being bullied. The School's Anti-Bullying Policy makes it clear that bullying behaviour of any kind is not acceptable and will be taken very seriously.

The School also recognises that bullying (or other matters such as bereavement) can lead to learning difficulties or wider mental health difficulties. Persistent disruptive or withdrawn behaviours do not necessarily mean that a child or young person has SEN but where there are concerns, an assessment may be undertaken to determine whether there are any causal factors such as undiagnosed learning difficulties, difficulties with communication or mental health issues.

The School recognises that children with SEN and disabilities can face additional safeguarding challenges and additional barriers can therefore exist when recognising abuse and neglect in this group of children. These can include:

- assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration;
- the potential for children with SEN and disabilities being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs; and
- communication barriers and difficulties in overcoming these barriers.

The School's Child Protection and Safeguarding Policy will be followed if there are any safeguarding concerns relating to a child.

### **Access Arrangements**

Access arrangements are the principal way in which awarding bodies comply with the duty under the Equality Act 2010 to make reasonable adjustments. At Ashford School we do our best to ensure that those pupils who require access arrangements receive them. This is based on diagnostic testing as

well as history of need and normal way of working. The SENCO works closely with all teaching staff in completing the application to the awarding bodies.

### **Policy Review**

This policy will be reviewed annually. It will be monitored by the SENCO and updated and revised, if necessary, during the annual cycle.

V21/09/i

Date Document Updated	Document Updated by	Location of Saved File
September 2021	AT/ST/CN	

Date Document Reviewed	Document Reviewed by	Date of next review
October 2021	LGB	October 2022