

# St Bartholomew's C of E Primary School Inclusion Policy

## Legislative Compliance

This policy has been written as guidance for staff, parents or carers and children with reference to the following guidance and documents:

SEN Code of Practice (which takes account of the SEN provisions of the SEN and Disability Act 2001) September 2014, Ofsted Inspection Framework, Ofsted SEN Review 2010 "A Statement is not enough" Equality Act 2010, Education Bill 2011, Children and Families Act 2014

## **Mission Statement**

Recognising its historic foundation, the school will preserve and develop its religious character in accordance with the principles of the Church of England. The school will work in partnership with the Church of England and the Church, at parish and diocesan level.

The school aims to serve its community by providing an education of the highest quality within the context of Christian belief and practice. It encourages an understanding of the meaning and significance and faith, and promotes Christian values through the experience it offers to all its pupils.

St Bartholomew's is committed to safeguarding and promoting the welfare of its pupils. We believe all staff and visitors have an important and unique role to play in the protection of children.

# BARTS: Believe, Achieve, Respect, Together, Succeed

#### Inclusion at St Bartholomew's

At St Bartholomew's C of E Primary School, we endeavour to achieve the inclusion of all children, including vulnerable learners, whilst meeting children's individual needs. Teachers provide highly effective wave 1 teaching with differentiated learning opportunities for all the children within the school and provide materials appropriate to children's interests and abilities. This ensures that all children have full access to the school curriculum. Special Educational Need might be an explanation for delayed or slower progress but is not an excuse and we make every effort to narrow the gap in attainment between vulnerable groups of learners and others. English as an Additional Language (EAL) is not considered a Special Education Need. Differentiated work and individual learning opportunities are provided for children who are learning EAL as part of our provision for vulnerable learners. We focus on individual progress as the main indicator of success. We strive to make a clear distinction between "underachievement" – often caused by a poor early experience of learning - and

Special Educational Needs. Some pupils in our school may be underachieving but will not necessarily have a Special Educational Need. It is our responsibility to spot this quickly and ensure that appropriate interventions are put in place to help these pupils catch up. Other pupils will genuinely have Special Educational Needs and this may lead to lower attainment, though not necessarily to under achievement. It is our responsibility to ensure that pupils with Special Educational Needs have the maximum opportunity to attain and achieve in line with their peers. Accurate assessment of need and carefully planned programmes, which address the root causes of any learning difficulty, are essential ingredients of success for these pupils. We endeavour to encourage parents and children in the decision making process.

# Aims and Objectives of this Policy

St Bartholomew's C of E Primary School is a highly inclusive primary school which strives to meet the individual needs of all learners. We work in partnership with children, parents and other agencies to provide the best possible educational outcomes for all our children, including those with a range of additional and complex needs. The school's Inclusion policy and the procedures in place ensure that high expectations, early intervention and prompt and appropriate support for all our children enables them to meet their full potential.

# The aims of our inclusion policy are;

- To provide curriculum access for all.
- To secure high levels of achievement for all.
- To meet individual needs through a wide range of provision.
- To attain high levels of satisfaction and participation from pupils, parent and carers.
- To carefully map provision for all vulnerable learners to ensure that staffing deployment, resource allocation and choice of intervention is leading to good learning outcomes.
- To ensure a high level of staff expertise to meet pupil need, through well targeted and continued professional development.
- To work in cooperative and productive partnership with the Local Authority and other outside agencies, to ensure there is a multi-professional approach to meet the needs of all vulnerable learners.
- To promote children's self-esteem and emotional well-being and help them to form and maintain worthwhile relationships based on respect for themselves and others

# **Teaching Stages**

A graduated response of: 'Assess, Plan, Do, Review,' forms a cycle through which decisions and actions are revisited, refined and revised. A growing understanding of the pupils needs and of what supports the pupil in making progress secures positive outcomes.

The following stages set out our approach to the identification and assessment of children's special educational needs.

# Stage 1

Well-differentiated, quality first teaching, including, where appropriate, the use of Wave 1 or Wave 2 Interventions. All vulnerable learners to be included on a provision map.

All learners will have access to quality first teaching. This is promoted through a range of inclusive strategies, interventions and differentiation of the school curriculum. Some vulnerable learners will access Wave 1 or Wave 2 interventions. These will be pupils who are underachieving and have been identified by the school as needing to make accelerated progress but will not necessarily be pupils with special educational needs. This is considered to be differentiation of the usual school curriculum. All vulnerable learners will be included on a provision map which outlines and monitors additional intervention across the school. The analysis of data and the school provision map enables the school to;

- Plan strategically to meet pupils' identified needs and track their provision;
- Audit how well provision matches need; 2 recognise gaps in provision;
- Highlight repetitive or ineffective use of resources;
- Cost provision effectively;
- Demonstrate accountability for financial efficiency; 2 demonstrate to all staff how support is deployed;
- Inform parents, LEA, external agencies and Ofsted about resource deployment;
- Focus attention on whole-school issues of learning and teaching as well as individual needs, providing an important tool for self-evaluation.

# Identification and Assessment at Stage 1

Children's needs will be identified and met as early as possible through:

- The analysis of data including entry profiles, Foundation Stage Profile scores, EAL Assessments, reading ages, other whole-school pupil progress data;
- Classroom-based assessment and monitoring arrangements. (Cycle of planning, action and review.)
- The following up of parental concerns
- Tracking individual children's progress over time
- Liaison with feeder nurseries on transfer
- Information from previous schools
- Information from other services
- Maintaining a provision map for all vulnerable learners which clearly identifies pupils receiving additional SEN Support from the school's devolved budget or in receipt of High Needs funding

- Undertaking, when necessary, a more in depth individual assessment this may include a range of commercially available assessments, carefully chosen to deliver appropriate, useful information on a pupil's needs. It may include a bilingual assessment where English is not the first language or an assessment of Speech, Language and Communication.
- Involving an external agency where it is suspected that a special educational need is significant.

## Curriculum Access and Provision for vulnerable learners

Where children are underachieving, the school provides for these pupils in a variety of ways and might use a combination of these approaches to address targets identified for individual pupils:

- Differentiated work as part of quality first teaching
- Wave 1,2 and 3 interventions
- Other small group withdrawal
- Individual class support / individual withdrawal
- Bilingual support/access to support materials
- Further resources or differentiation of resources
- Study buddies
- Personalised Programme reviews
- Pre and post teaching
- Councelling
- Family support

# **Monitoring and Evaluation**

The monitoring and evaluation of the effectiveness of our provision for vulnerable learners is carried out in the following ways:

- Classroom observation / learning enquiries/ deep dives by the SENCos and Senior Leaders
- Ongoing assessment of progress made by intervention groups
- Work sampling
- Scrutiny of planning and differentiation
- Teacher discussions with the Inclusion Manager /SENCo / Phase Team /Senior Leadership Team /
- Informal feedback from all staff
- Pupil questionnaires or discussions when setting new targets or reviewing existing targets
- Pupil progress tracking using assessment data (whole-school)

• Intervention analysis /monitoring support and intervention and evaluating the impact on pupils' progress

- Attendance records
- Headteachers report to parents and governors

If it becomes clear that a vulnerable learner requires intervention which is 'additional to' or 'different from' the well differentiated curriculum, the child may be placed on the list of pupils that require special provision and moved to stage 2.

# Stage 2 Additional SEN Support (Graduated Approach)

Pupils will be offered additional SEN support when it is clear that their needs require intervention which is "additional to" or "different from" the well-differentiated curriculum offer for all pupils in the school i.e. they have a special educational need as defined by the SEN Code of Practice 2014.

- 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.
- A child of compulsory school age 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, has a disability which prevents or hinders him or her from making use of facilities of a kind generally provided for others of the same age in mainstream schools.
- Under-achieving pupils and pupils with EAL who do not have SEN will not be placed on the list of pupils being offered additional SEN support (but will be on the school's provision map).
- In keeping with all vulnerable learners, intervention for pupils on the SEN list will be identified and tracked using the provision map.
- On very rare occasions, where a pupil has a significant, severe and sustained need, it may be necessary to enter an assessment process with the authority, health and social care in order to consider the need for an Education Health and Care Plan.
- Pupils identified with SEND will have an Individual Support Plan called a Graduated Support Record I Graduated Support Records (GSRs) are a planning, teaching and reviewing tool which enable us offer a graduated approach to support pupils with Special Educational Needs. They enable us to focus on particular areas of development for pupils to ensure that progress is made. GSRs are a working document which can be constantly annotated, refined and amended The will only display that which is additional to or different from the differentiated curriculum plan which is in place as part of provision for all children. Targets/ Outcomes may address the underlying reasons as to why a pupil is having difficulty with learning; Eg Social Interventions, Memory and Attention Interventions, Speech and Language Therapy, key specific concepts etc Graduated Support Plans (GSPs) will be accessible to all those involved in their implementation, pupils should have an understanding and "ownership of the targets and outcomes or provision " GSPs will be based on informed assessment and will include the input of outside agencies as appropriate

 Graduated Support Plans have been devised so that they are manageable and easily monitored and therefore will be monitored and evaluated regularly, will be time-limited, FFI Funded pupils will have a maximum of four short / medium term SMART (Short, measurable, achievable, realistic, timely) targets set for or by the pupil. Other pupils with SEND will have a Graduated Support Plan which will be clear and will specify what provision will be in place for the pupil, a clear review of the progress of the pupil. I Targets or provision for a Graduated Support Plan may be arrived at through discussion between teachers/SENCo, discussion with Phase Leaders, discussion, wherever possible, with parents/carers and with the pupil and discussions with other professionals.

A letter will be given to parents informing them that their child has been placed on the SEND register and a meeting may be held to discuss this with them.

## Stage 3 Education Health and Care Plan

<sup>2</sup> Pupils with an Education Health and Care Plan (post September 2014) will have access to all arrangements for pupils on the SEN list (above) and, in addition to this, will have an Annual Review of their statement/plan. <sup>2</sup> Our school will comply with all local arrangements and procedures when applying for High Needs Block Funding and an Education Health and Care Plan. We will ensure that all pre- requisites for application have been met where possible through ambitious and pro-active additional SEN Support using our devolved budget at an earlier stage. <sup>2</sup> Our review procedures fully comply with those recommended in Section 6.15 of the Special Educational Needs Code of Practice and with Children's Services policy and guidance - particularly with regard to the timescales set out within the process.

SEND provision and progress for pupils at Stage 2 and 3 will be reviewed in a review meeting with parents and professionals involved at least twice annually.

# Inclusion of Pupils With English As An Additional Language

#### Definition

A pupil who has English as an Additional Language is a pupil whose first language is not English, and who uses their first language on a regular basis inside or outside of school. EAL pupils are not considered to have a Special Educational Need, but are seen to benefit from the ability to live and learn in more than one language.

Ethos We strive to recognise, welcome and celebrate linguistic and cultural diversity and have a high expectation of all pupils regardless of ethnic, cultural or linguistic heritage. We aim to include all pupils and parents in our school by respecting that diversity and reflecting it in our school environment, curriculum, learning resources and partnership with parents. We welcome the enrichment that linguistic and cultural diversity brings to our school community.

Admissions No pupil will be refused admission on the basis of ethnicity or EAL. Pupils who have EAL will be admitted under the same criteria as any other pupil applying for a school place. Where parents do not speak English, wherever possible we endeavour to provide oral and written information and help in first language which will facilitate the admission process and provide key information about our school. On admission, the pupil will have access to welcome and induction procedures and after that, access to an appropriate curriculum that is linguistically challenging.

## Provision

Pupils with EAL will have full access to mainstream provision regardless of their proficiency in English. Where necessary, additional support will be given to improve acquisition of English: this will be provided through Wave 1 and, where appropriate, Wave 2 teaching.

The following provision can be expected:

- Initial assessment
- Work in class will be differentiated for the pupils to lessen linguistic difficulties without significantly reducing challenge;
- Additional support for pupils may be given through first language resources & translation facilities; teaching support on a 1:1 or small group basis, peer group support; pre-teaching of key concepts and vocabulary;
- A range of strategies will support learning as appropriate eg visual aids, graphic organisers etc
- Progress of EAL pupils will be monitored against Curriculum indicators. Where accelerated progress in English is needed, targets will be set and provision made on agreement between the class teacher and the phase leader /EAL Leader.
- Provision will be recorded and monitored for effectiveness using the school's provision map, in line with standard practice for all vulnerable learners in the school. The pupil will not be placed on the SEN register for reasons of EAL.

#### Parental support

We recognise that some parents who are learning English may find it difficult to communicate with the school and approach the school regarding any concerns they may have on their child's progress. We endeavour to fully include EAL parents in the life of the school by, wherever possible, providing interpreting facilities at parents' evenings and other school meetings and by providing key school information in translated format if appropriate.

#### Inclusion of Gypsy, Roma and Traveller children

We strive to recognise, welcome and celebrate the heritage of our children who come from Gypsy, Roma and Traveller communities. Expectations of their possible achievement will be high. Expectations will also be high relating to attendance although we are aware some families may go travelling during term time as part of their parent/carers trade or business. We will work closely with families and the Gypsy, Roma and Traveller team to ensure best possible attendance and progress can be made. Children may need and will receive additional support or interventions where required. Any provision will be recorded and monitored for effectiveness using the schools provision map, in line with standard practice for all vulnerable learners in school.

## Inclusion of Children who are Looked After

Our school recognises that:

Children who are looked after have the same rights as all children but may have additional needs due to attachment issues, early neglect, separation and loss, trauma and many placement moves. These barriers to learning can affect their educational outcomes and their personal, social and emotional development. There are commonly understood reasons (Social Exclusion Unit Report: 2003) why children who are looked after in local authority care often fail to make expected progress at school;

- Placement instability
- Unsatisfactory educational experiences of many carers
- Too much time out of school
- Insufficient help if they fall behind
- Unmet needs emotional, mental, physical

There is a statutory requirement for all schools to have a designated teacher (DT) for looked after children. The responsibilities of our designated teacher include:

- Monitoring the progress of children who are 'looked after' to ensure that they have the best life chances possible and access to the full range of opportunities in school
- Ensuring that children who are 'looked after' have access to the appropriate network of support;
- Checking that the statutory Personal Education Plan (PEP) has been arranged and that it is regularly reviewed, at least every six months;
- Ensuring that information concerning the education of children who are 'looked after' is transferred between agencies and individuals;
- Preparing a report on the child's educational progress to contribute towards the statutory review;
- Liaising with the child's social worker to ensure that there is effective communication at all times;
- Celebrating the child's successes and acknowledge the progress they are making.

Our school will work closely with Children's Services and Virtual School (VS) for Children which promotes the educational needs of Children who are Looked After and monitors admissions, PEP completion, attendance & exclusions.

#### Inclusion of pupils who are very able and/or talented

In this section the term 'very able' refers to pupils who have a broad range of achievement at a very high level. Those children who are very able have very well-developed learning skills across the curriculum. The term 'talented' refers to pupils who excel in one or more specific fields, such as sport or music, but who may or may not perform at a high level across all areas of learning.

We respect the right of all children in our school, irrespective of differences in ability, to access a number of areas of learning, and to develop the knowledge, skills, understanding and attitudes that are necessary for their self-fulfilment and eventual development into active and responsible adults.

Identification A very able or talented pupil should be identified using a variety of methods. The specific procedure will vary according to subject area but will include elements of the following:

Teacher nomination, assessment results, specialist teacher identification, parental nomination, peer nomination.

Each year the school identifies children who are very able and/or talented and supports these children through curriculum provision and after school activities.

We give all children the opportunity to show what they know, understand and can do, and we achieve this in a variety of ways when planning for children's learning.

We offer a wide range of extra-curricular activities for our children. These activities offer very able and/or talented children the opportunity to further extend their learning in a range of activities. Opportunities include a range of Sporting, ICT, Literacy and Musical Clubs.

Our SEND co-ordinators (SENDCo's) is Mrs K Brown. Our SEND Governors is Mrs Ruth Oseme. Our Intervention Leaders are our Phase Team Leaders. Our EAL (English as an Additional Language) Leaders are Mrs L Smith and Miss K Ross.

Designated Staff for Children Looked After are Mrs Lisa McCaffrey and Mr Billy Waters.

Our Safeguarding / Children Looked After Governor is Mrs Ruth Oseme

Our More Able and Talented Leader is Mrs L McCaffrey.

Our Inclusion Managers is Mrs K Brown

The SENCo is responsible for reporting regularly to the head and the governor with responsibility for SEND on the ongoing effectiveness of this inclusion policy. The EAL Leader has strategic responsibility for the inclusion of children who have EAL and the achievement of vulnerable ethnic minority groups. The Designated Teacher for Children Looked After has strategic responsibility for the inclusion of children who are adopted or in local authority care. All staff in school have responsibility for maximising achievement and opportunity of vulnerable learners – specifically, all teachers are teachers of pupils with special educational needs and EAL. Staff are aware of their

responsibilities towards all vulnerable learners and a positive and sensitive attitude is shown towards all pupils at all times.

## **ROLES AND RESPONSIBILITIES**

#### **Headteacher**

The Headteacher is responsible for monitoring and evaluating the progress of all pupils and for making strategic decisions which will maximise their opportunity to learn

The governing body will delegate the day to day implementation of this policy to the Headteacher, Special Educational Needs Coordinator (SENCo), EAL Leader and Phase Leaders.

## Special Educational Needs Coordinator

In line with the recommendations in the SEN Code of Practice 2014, the SENCo alongside the Phase Team Leaders, will oversee the day- to-day operation of this policy in the following ways:

- Identifying a list of pupils with special educational needs those in receipt of additional SEN support from the schools devolved budget, those in receipt of High Needs funding and those with statements of Special Educational Need or Education Health and Care plans;
- Co-ordinating provision for children with special educational needs;
- Liaising with and advising teachers;
- Managing other classroom staff involved in supporting vulnerable learners;
- Overseeing the records of all children with Special Educational Needs;
- Liaising with parents of children with SEN, in conjunction with class teachers; I contributing to the in-service training of staff;
- Implementing a programme of Annual Review for all pupils with a statement of special educational need/Education Health and Care Plan. Complying with requests from an Education Health and Care Plan Coordinator to participate in a review;
- Carrying out referral procedures to the Local Authority to request High Needs funding and/or an Education Health and Care Plan when it is suspected, on strong evidence arising from previous intervention (additional SEN support from devolved budget), that a pupil may have a special educational need which will require significant support;
- Overseeing the smooth running of transition arrangements and transfer of information for Year 6 pupils on the vulnerable learners' provision map;
- Monitoring the school's system for ensuring that Personalised Programmes, where it is agreed they will be useful for a pupil with special educational needs, have a high profile in the classroom and with pupils (see section below on Personalised Programmes);
- Liaising sensitively with parents and families of pupils on the Early Help lists, keeping them informed of progress and listening to their views of progress;
- Attending area SENCO network meetings and training as appropriate; 2 liaising with the school's SEN Governor;
- Liaising closely with a range of outside agencies to support vulnerable learners;

## **Intervention Leaders**

Intervention Leaders alongside Phase Team Leaders will be responsible for:

- Analysing internal tracking data in order to identify vulnerable learners and planning appropriate interventions;
- Identifying appropriately trained and capable teaching assistants to deliver these interventions where appropriate;
- Monitoring the delivery and frequency of the interventions;
- Creating the whole school provision map;
- Reviewing, evaluating and updating the provision map and interventions as necessary.

# Designated Teacher for Children who are Looked After (or have Special Guardianship Arrangements)

The designated teacher will be responsible for:

- Ensuring all children who are looked after or who were previously looked after are included in the provision map where necessary;
- Analysing internal tracking data and end of year assessments to ensure that appropriate progress is made;
- Attending reviews and Virtual School briefings;
- Writing reports for PEPs;
- Completing all necessary paperwork including that for reviews;
- Communicating with the social worker, children and carers.

# English as an Additional Language Leader

The EAL Leader will oversee the day-to-day operation of this policy in the following ways:

- Maintenance of a list of pupils with EAL, liaising with year group leaders and ensuring they are identified on the school's provision map whenever necessary;
- Advising on and co-ordinating provision for children with additional needs relating to ethnic or linguistic background;
- Working collaboratively with teachers to plan for and teach children with EAL as part of mainstream teaching practice;
- Overseeing the initial and on-going assessment records on all children with EAL;
- Liaising with parents of EAL children, in conjunction with class teachers, keeping them informed of progress and listening to their views of progress;
- Advising on and sourcing bilingual and culturally reflective materials to support children's learning across the curriculum;

• Attending EAL Leader training as appropriate;

# **Class teachers**

Liaising with the SENCO/Phase Leaders and EAL Co-ordinator to agree :

Which pupils in the class are vulnerable learners

- Which pupils are underachieving and need to have their additional interventions monitored on the a vulnerable learners' provision map but do not have special educational needs.
- Which pupils (also on the provision map) require additional support because of a special educational need and need to go on the school's SEN list. Some of these pupils may require advice/support from an outside professional and, therefore, a Graduated Support Plan to address a special educational need (this would include pupils with statements/EHC Plans)
- Following the SEN Timeline

Securing good provision and good outcomes for all groups of vulnerable learners by :

- Providing differentiated teaching and learning opportunities, including differentiated work for EAL pupils which reduces linguistic difficulty whilst maintaining cognitive challenge
- Ensuring there is adequate opportunity for pupils with special educational needs to working on agreed provision or targets which is/are genuinely "additional to" or "different from" those normally provided as part of the differentiated curriculum offer and strategies". (SEN Code of Practice 2013)
- Ensuring effective deployment of resources including teaching assistant support to maximise outcomes for all groups of vulnerable learners

In accordance with Section 6 of the SEN Code of Practice 2014, if appointed after September 2008, our Special Educational Needs Coordinator will be a qualified teacher working at our school and will have statutory accreditation. If a new SENCO is appointed, he/she will gain statutory accreditation within three years of appointment. The SENCO and EAL Coordinator will regularly attend local network meetings. All staff will be trained in how to best support all vulnerable learners in order to maximise their achievement as part of the school development plan and annual schedule of continuous professional development. Specialist advice and expertise in relation to assessment and support of individual pupils will be commissioned by the school from the open market. Service level agreements and quality assurance criteria will be put in place at the point of commissioning and the Headteacher and senior leaders will be responsible for reporting to governors on the efficiancy of these arrangements (including value for money). Our school will, wherever possible, join with other schools in joint commissioning and quality assurance arrangements.

Partnership with Parents/Carers

The school aims to work in partnership with parents and carers. We do so by:

Working effectively with all other agencies supporting children and their parents

Giving parents and carers opportunities to play an active and valued role in their child's education

Making parents and carers feel welcome

Encouraging parents and carers to inform school of any difficulties they perceive their child may be having or other needs the child may have which need addressing

Instilling confidence that the school will listen and act appropriately

Focusing on the child's strengths as well as areas of additional need

Allowing parents and carers opportunities to discuss ways in which they and the school can help their child

Agreeing targets or additional provision for all pupils, in particular, those not making expected progress and, for some pupils identified as having special educational needs, involving parents in the drawing-up and monitoring progress, keeping parents and carers informed and giving support during assessment and any related decision-making process

Making parents and carers aware of the SENDIAS Services, providing all information in an accessible way, including, where necessary, translated information for parents with English as an Additional Language.

#### **Involvement of Pupils**

We recognise that all pupils have the right to be involved in making decisions and exercising choice. In most lessons, all pupils are involved in monitoring and reviewing their progress. We endeavour to fully involve all pupils by encouraging them to: State their views about their education and learning, Identify their own needs and learn about learning, share in individual target setting across the curriculum so that they know what their targets are and why they have them, self-review their progress and set new targets (for some pupils with special educational needs) monitor their success at achieving the outcomes identified by their class teachers/ SLT. Providing provision recorded on their graduated Support Plan. Take into account their goals and aspirations where appropriate.

# **Effective Transition**

We will ensure timely planning for transfer to a pupil's next phase for all pupils in receipt of Additional SEN support and all pupils with Education Health and Care Plans will have next phase destinations and transition arrangements discussed at plan review meetings

Support for the pupil in coming to terms with moving on will be carefully planned and where appropriate may include familiarisation visits and/or counselling. Pupils will be included in all "class transition days" to the next phase but may also be offered additional transition visits. Pupils and parents will be encouraged to consider all options for the next phase of education and the school

will involve outside agencies, as appropriate, to ensure information is comprehensive but easily accessible and understandable. Accompanied visits to other providers may be arranged as appropriate.

COVID / Lockdown

When the community is placed in lockdown the school will ensure that SEND pupils are catered for. High level need pupils will be invited into school and classed as vulnerable. Other SEND pupils will have access to individualised resource packs or will have access to differentiated work packs / online learning. The school will ensure that the needs of all SEND pupils are met.

Policy Reviewed on 12.1.21

Next Policy Review due Jan 22