

# COWLEY INTERNATIONAL COLLEGE



## SEND POLICY

Status	STATUTORY
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**Definitions of special educational needs and/or a disability (SEND) taken from section 20 of the Young person and Families Act 2014.**

A young person has a SEND (Special Educational Need or Disability) if they have a learning difficulty or disability which calls for special educational provision to be made for them. A young person of compulsory school age or a young person has a learning difficulty or disability if they:

- a) Have a significantly greater difficulty in learning than the majority of others of the same age; or
- b) Have a disability which prevents or hinders them from making use of educational facilities of a kind generally provided for others of the same age in mainstream schools or mainstream post-16 institutions.

A young person under compulsory school age has special educational needs if they fall within the definition at (a) or (b) above or would do so if special educational provision was not made for them.

A young person must 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.

More details about the SEND (Special Educational Needs and Disability) Code of Practice can be found on the Department for Education's website:

<https://www.gov.uk/young-person-with-special-educational-needs>

<https://www.gov.uk/government/publications/SENDd-code-of-practice-0-to-25>

'Easy Read' guides can also be accessed via

<https://www.gov.uk/government/publications/send-support-easy-read-guide-for-parents>

## Rationale

This Policy builds on Cowley International College's core values and ethos, namely to raise attainment of every young person. Our central belief is that every young person will have the opportunity to reach their full potential and have their individual needs catered for.

The college believes that all young persons should be valued equally. We will strive to eliminate prejudice and discrimination. We will work to develop an environment where all can flourish and feel safe and all young persons can experience success.

The college is committed to Inclusion. We aim to engender a sense of community and belonging, and to offer new opportunities to learners who may have experienced previous difficulties.

Young people with Special Educational Needs and Disabilities (SEND) can experience significant barriers to learning which hinder their progress. From September 2014, a new Code of Practice outlined significant changes to how schools and other bodies support young people with SEND. This policy outlines how Cowley International College is implementing these changes as part of our commitment to Inclusion.

This is an inclusive college and there are high expectations for the achievement of SEND students. The college has a regard for the SEND Code of Practice 0-25years (2015) in that:

- It sees that all students are entitled to an education that enables them to make progress
- All students have access to a broad and balanced curriculum
- Teachers are expected to set high expectations for every student, whatever their prior attainment
- Teachers are expected to use appropriate assessments to set targets which are deliberately ambitious. Potential areas of difficulty are identified and addressed at the outset.
- Students with SEND are able to study the full National Curriculum
- Teachers are responsible and accountable for the progress and development of the students in their class, including where students access support from teaching assistants or specialist staff.
- The college regards high quality teaching, differentiated for individual students, as the first step in responding to students who have or may have SEND
- The college regularly and carefully reviews the quality of teaching for all students, including those at risk of underachievement

## Aims

- ❖ To ensure that all young persons have access to a broad and balanced curriculum including the National Curriculum in line with the Special Educational Needs Code of Practice, 2015. This curriculum should be appropriate to their needs, promoting high standards and the fulfilment of potential.

This should enable them to:

- Achieve their best
- Become confident individuals living fulfilling lives, and
- Make a successful transition into adulthood, whether into employment, further or higher education or training

The quality of teaching for students with SEND, and the progress made by students, is a core part of the school's performance management arrangements and its approach to professional development for all teaching and support staff.

- ❖ To ensure the identification of all young persons requiring SEND provision as early as possible in their college career.
- ❖ To ensure that young persons with additional needs and disabilities take as full a part as possible in all college activities and will not be placed at a disadvantage.
- ❖ To ensure that parents of young people with SEND are kept fully informed of their young person's progress and attainment.
- ❖ To ensure that young persons with SEND are involved, where practicable, in decisions affecting their future SEND provision.
- ❖ To enable all young persons to experience the Cowleian attributes.

## Objectives

- ❖ **Identify the needs of young persons with SEND as early as possible.** This is most effectively done by gathering information from the young person, parents, education including feeder schools and other educational agencies where appropriate, health and care services prior to the young person's entry into the college.
- ❖ **Monitor the progress of all young persons** in order to aid the identification and progress of young persons with SEND. Continuous monitoring using assessment and progress data of young persons with SEND by their subject teachers will help to ensure that they are able to reach their full potential. In addition to this further monitoring will be carried out by the College Senior Leadership Team (SLT), Achievement Leaders and the SENCo (Special Educational Needs Coordinator) and Learning Support team to support identification.
- ❖ **Make appropriate provision to overcome all barriers to learning and ensure young persons with SEND have full access to the National Curriculum.** This will be co-ordinated by the SENCo and Curriculum Manager and will be carefully monitored and regularly reviewed in order to ensure that individual targets are being met and all young persons' needs are catered for.
- ❖ **Work with parents** to gain a better understanding of their young person, and involve them in all stages of their young person's education. This includes supporting them in terms of understanding SEND procedures and practices, providing regular reports on their young person's progress, and providing information on the provisions for young persons within the college.
- ❖ **Work with and in support of outside agencies** when the young persons' needs cannot be met by the college alone.
- ❖ **Create an environment where young persons feel safe to voice their opinions of their own needs.** Young person participation is a right and we adopt a person centred approach; young people with SEND often have a unique knowledge of their own needs and their views about what sort of help they would like to help them make the most of their education will be ascertained. Students will be encouraged to participate in all the decision-making processes and contribute to the assessment of their needs, their review and transition processes. Their views are sought at every stage and we encourage them to take responsibility for their own learning. This will be reflected not only in decision-making but also encouraged through wider opportunities for participation in college life e.g. membership of the College Council.
- ❖ **To explore new Partnerships to enhance young person provision and support.**

## **2. Responsibilities for the co-ordination of SEND provision**

- ❖ The person responsible for overseeing the provision for young person with SEND is Mr Sheeran, College Principal.
- ❖ The person responsible for overseeing the day to day provision and education for young persons with SEND is the Special Educational Needs Co-ordinator (SENCo).
- ❖ The SEND Link Governor for monitoring the provision of education for young persons with SEND is The Chair of Governors.

## **3. Arrangements for coordinating SEND provision**

The SENCo will hold details of all SEND support records such as young person profiles or structured conversations and subject targets for individual young persons.

### **All staff can access:**

- ❖ The SEND Policy;
- ❖ A copy of the SEND Register and alternative college documents and tools used for tracking this cohort;
- ❖ Guidance on identification in the Code of Practice (SEND Support and young persons with Education, Health and Care Plans);
- ❖ Information on individual young persons' special educational needs, including action plans, targets set and copies of their One Page Profile; practical advice, teaching strategies, and information about types of special educational needs and disabilities;
- ❖ Information on the staff IT system on current legislation and SEND provision, individual young persons and their special needs and requirements;
- ❖ Information available through St Helens' SEND Local Offer
- ❖ Information available through the schools SEND Information Report.

This information is produced in consultation with the young person and parents and made accessible to all staff and parents in order to aid the effective co-ordination of the college's SEND provision. In this way, every staff member will have complete and up-to-date information about all young persons with special needs and their requirements which will enable them to provide for the individual needs of all young persons.

## **4. Admission arrangements**

The admission arrangements for *all* young persons are in accordance with national legislation, including the Equality Act 2010. This includes young person with any level of SEND; those

with Education, Health and Care Plans and those without. Please refer to St Helens Council admissions policy for more information.

The college has a designated Co-ordinator of Transition who liaises with both feeder and non-feeder schools. In addition to this the Year Teams and SENCo regularly liaise with primary schools to share information and aid transition for young persons with SEND. This also includes a programme of additional visits for the young person and meetings with parents.

## **5. Specialist SEND provision**

Cowley International College has 85 young persons with an identified SEND. (5.5% of whole school population. Source: Autumn 2018 School Census)

We have staff with experience in supporting young persons with a wide range of needs including Autistic Spectrum Disorders, visual Impairments, hearing impairments, physical disabilities, Attention Deficit Hyperactivity Disorder, Oppositional Defiant Disorder, Dyslexia and Dyspraxia.

We are committed to whole college inclusion. For more information on our provision for inclusion including our involvement in specialist programmes to aid inclusion see section 10.

## **6. Facilities for young persons with SEND**

The college has a range of specialist SEND facilities in place and will respond to emerging needs. Facilities currently in place include:

- ❖ Lift access and wheelchair access to upper and lower areas.
- ❖ Flat entry to the side and ramp access at the rear for wheelchairs.
- ❖ Designated accessible toilet facilities.
- ❖ Laptops to support individuals with writing difficulties and visual impairments.
- ❖ Dragon natural speaking, an assistive software programme for producing written work from speech.
- ❖ Dyslexia reader pens
- ❖ White painted edges and railings to steps to support those with Visual Impairments.
- ❖ Designated parking for vehicles transporting young persons within easy access of the main school entrance

Furthermore, the college will respond to emerging needs

## **Accessibility Plan**

With the introduction of the Disability Discrimination Act (DDA 2005) there is a new duty to promote disability equality. This has been strengthened by the Equality Act 2010.

This involves a plan that describes how the college intends to improve access to learning for young persons who have disabilities. This plan is reviewed annually and updated every three years. It is our intention to:

- ❖ improve access to the physical environment
- ❖ improve access to the curriculum
- ❖ improve how we provide information, in a range of formats, for young persons with disabilities

There is a statutory requirement to identify those young persons who have a disability. The Equality Act states that someone is disabled if '*they have a mental or physical impairment which has a substantial and long-term adverse effect on their ability to carry out normal day-to-day activities*'.

Cowley International College will make reasonable adjustments which will meet the practical needs of disabled young person where necessary or required.

## **7. Allocation of resources for young persons with SEND**

The school is funded for SEND by the Local Authority following the updated national system used for mainstream schools:

**Element 1:** core education, place led funding from the Education Funding Agency for all students attending school

**Element 2:** Additional Support driven by proxy indicators such as local deprivation and prior attainment decided by the Education Funding Agency

**Element 3:** Top-up funding from the Local Authority to meet the individual needs of High Need students placed in the school.

Allocation of resources is determined by the level of needs of the young person and is made in conjunction with the college policies, Senior Leadership, the SENCo and relevant professionals. Resources can include: Literacy Interventions, Numeracy Interventions, Social Stories Programme, 1:1 In class support, 1:1 withdrawal/mentoring, Nurture provision, preparation of suitable materials e.g. large print. We also ensure we are up to date with the development of new technologies and their potential to support communication, teaching and learning for children and young people with SEND. We make use of additional aids such as computers, reading pens, coloured overlays and printing.

In addition to the funding detailed above some young persons may be eligible for other sources of funding. These other sources include Young person Premium funding as detailed in the Pupil Premium Plan which can be found on the college website.

## 8. Identification of young person's needs

### Identification

See definition of Special Educational Needs and / or a Disability at the start of this policy

### A graduated approach: *Quality First Teaching*

- a) Any young person who is falling significantly outside of the range of expected academic achievement in line with predicted performance indicators and grade boundaries will be monitored.
- b) Once a young person has been identified as *possibly* having SEND they will be closely monitored by staff in order to gauge their level of learning and possible difficulties.
- c) The young person's class teacher will take steps to provide differentiated learning opportunities that will aid the young person's academic progression and enable the teacher to better understand the provision and teaching style that needs to be applied.
- d) The SENCo will be consulted as needed for support and advice and may wish to observe the young person in class.
- e) Through (b) and (d) it can be determined which level of provision the young person will need going forward.
- f) If a young person has recently been removed from the SEND list they may also fall into this category as continued monitoring will be necessary.
- g) Parents will be informed fully of every stage of their young person's development and the circumstances under which they are being monitored. They are encouraged to share information and knowledge with the college.
- h) The young person is formally recorded by the college as being under observation due to concern by parent or teacher but this does not place the young person on the college's SEND list. Parents are given this information. It is recorded by the college as an aid to further progression and for future reference.
- i) Young person progress meetings are used to monitor and assess the progress being made by the young person. The frequency of these meetings is dependent on the individual young person's needs and progress being made.

### **SEND Support**

Where it is determined that a Young person does have SEND, parents will be formally advised of this and the decision will be added to the Young person's college records. The aim of formally identifying a young person with SEND is to help college ensure that effective provision is put in place and so remove barriers to learning.

The support provided consists of a four – part process: **Assess / Plan / Do / Review**

This is an ongoing cycle to enable the provision to be refined and revised as the understanding of the needs of the Young person grows. This cycle enables the identification

of those interventions which are the most effective in supporting the Young person to achieve good progress and outcomes.

### **Assess**

This involves clearly analysing the young person's needs using the subject teacher's assessment and experience of working with the young person, details of previous progress and attainment, comparisons with peers and national data, as well as the views and experience of parents. The young person's views and where relevant, advice from external support services will also be considered. Any parental concerns will be noted and compared with the college's information and assessment data on how the young person is progressing.

This analysis will require regular review to ensure that support and intervention is matched to need, that barriers to learning are clearly identified and being overcome and that the interventions being used are developing and evolving as required. Where external support staff are already involved, their work will help to inform the assessment of need. Where they are not involved they may be contacted, if this is felt to be appropriate, following discussion and agreement from parents.

### **Plan**

Planning will involve consultation between the teacher, SENCo and parents to agree the adjustments, interventions and support that are required; the impact on progress, development and or behaviour that is expected and a clear date for review. Parental involvement may be sought, where appropriate, to reinforce or contribute to progress at home.

All those working with the young person, including support staff, will be informed of their individual needs, the support that is being provided, any particular teaching strategies/approaches that are being employed and the outcomes that are being sought. Information sharing will be done through the Young person Profile.

### **Do**

The subject teacher remains responsible for working with the young person on a day-to-day basis. They will retain responsibility even where the interventions may involve group or one-to-one teaching away from the main subject teacher. They will work closely with teaching assistants and /or relevant specialist staff to plan and assess the impact of support and interventions and links with classroom teaching. Support with further assessment of the young person's strengths and weaknesses, problem solving and advising of the implementation of effective support will be provided by the SENCo.

### **Review**

Reviews will be undertaken in line with agreed dates. The review process will evaluate the impact and quality of the support and interventions. It will also take account of the views of the young person and their parents. The subject teacher, in conjunction with the SENCo will revise the support and outcomes based on the young person's progress and development

making any necessary amendments going forward, in consultation with parents and the young person.

Parents will be provided with clear information about the impact of support to enable them to be involved in planning the next steps.

### ***Referral for an Education, Health and Care Plan***

If a young person has lifelong or significant difficulties they may undergo a Statutory Assessment Process which is usually requested by the college but can be requested by a parent. This will occur where the complexity of need or a lack of clarity around the needs of the young person are such that a multi-agency approach to assessing that need, to planning provision and identifying resources, is required.

The decision to make a referral for a statement will be taken at a SEND Planning & Consultation meeting, held termly.

The application for an Education, Health and Care Plans will combine information from a variety of sources including:

- ❖ Young persons
- ❖ Parents
- ❖ Teachers
- ❖ SENCo
- ❖ Social Care
- ❖ Health Professionals

Information will be gathered relating to the current provision provided, action points that have been taken, and the preliminary outcomes of targets set. A decision will be made by a group of people from education, health and social care about whether or the young person is eligible for an EHC Plan. Parents have the right to appeal against a decision not to initiate a statutory assessment leading to an EHC Plan.

Further information about EHC Plans can found via the St Helens Local Authority 'SEND Local Offer' at: <https://www.sthelens.gov.uk/send/parent-carer/education-health-and-care-plans/>

or by contacting St Helens Information Advice & Support Network on: **01744 822160**

## ***Education, Health and Care Plans [EHC Plan]***

- a) Following Statutory Assessment, an EHC Plan will be provided by St Helens Council, if it is decided that the young person's needs are not being met by the support that is ordinarily available. The college and the young person's parents will be involved developing and producing the plan (the timespan is 20 weeks from the point at which an EHC Plan is agreed as required to the point of a draft document produced).
- b) Parents have the right to appeal against the content of the EHC Plan. They may also appeal against the school named in the Plan if it differs from their preferred choice.
- c) Once the EHC Plan has been completed and agreed, it will be kept as part of the young person's formal record and reviewed at least annually by staff, parents and the young person. The annual review enables provision for the Young person to be evaluated and, where appropriate, for changes to be put in place, for example, reducing or increasing levels of support.

## **9. Access to the curriculum, information and associated services**

Young persons with SEND will be given access to the curriculum through the specialist SEND provision provided by the college as is necessary, as far as possible, in line with the wishes of their parents and the needs of the individual.

Every effort will be made to educate young persons with SEND alongside their peers in a mainstream classroom setting. Where this is not possible, the SENCo will consult with the young person's parents for other flexible arrangements to be made.

### **Procedures and Review:**

- ❖ Keeping staff fully informed of the special educational needs of any young persons in their charge including sharing progress reports, medical reports and teacher feedback.
- ❖ Providing regular training and learning opportunities for staff in all departments on the subject of SEND and SEND teaching. College staff should be up to date with teaching methods which will aid the progress of all young persons including those with SEND.
- ❖ Reviewing annually in consultation with Senior Management and curriculum leaders the exam courses available and offered to individuals and groups to ensure they are appropriate and accessible.
- ❖ Making use of all class facilities and space.
- ❖ Using in-class provisions and support effectively to ensure that the curriculum is differentiated where necessary.

- ❖ Using and reviewing relevant and appropriate interventions to narrow the gaps in literacy and numeracy skills for SEND young persons.
- ❖ Making sure that individual or group tuition is available where it is felt that young persons would benefit from this provision.
- ❖ Any decision to provide group teaching outside the classroom will involve the SENCo in providing a rationale and focus on flexible teaching. Parents will be made aware of any circumstances in which changes have been made.
- ❖ Offering appropriate alternative provision where necessary and always in consultation with parents.
- ❖ Setting appropriate individual targets that motivate young persons to do their best, and celebrating achievements at all levels.

## **10. Inclusion of young persons with SEND**

The Principal oversees the college's policy for Inclusion and is responsible for ensuring that it is implemented effectively throughout the college.

The curriculum is regularly reviewed annually by the Senior Management Team to ensure that it promotes the inclusion of all young persons. This is more than just giving pupils 'access to the curriculum'. The curriculum is there to be changed, where necessary, to include all pupils. This includes learning outside the classroom.

The college will seek advice, as appropriate, around individual young persons, from external support services through the termly 'SEND Planning and Consultation meetings', Early Help Unit and the Multi-Agency Safeguarding Hub. Sharing knowledge and information with our support services is key to the effective and successful SEND provision within our college. Any one of the support services may raise concerns about a young person. This will then be brought to the attention of the SENCo, who will then inform the young person's parents.

External Support agencies can include:

- ❖ Educational psychologists.
- ❖ Specialist family services
- ❖ Medical staff, including School Nurse, GP, Paediatrician, CAMHS
- ❖ Speech therapists.
- ❖ Physiotherapists.
- ❖ Occupational Therapy
- ❖ Health Related Education Team (HRET)
- ❖ Targeted Support
- ❖ Social Care

The College believes that Physical Education, experienced in a safe and supportive environment, is vital and unique in its contribution to our students' physical and emotional development and health. We provide students with opportunities to try new activities, develop new skills and grow in confidence through the curriculum. We follow the **Olympic and Paralympic legacy** by continuing to follow the values and ethos throughout the school and maintaining a knowledge of sportsmen and women, including major sporting events. Furthermore, we provide opportunities for students to take part in competition both intra and inter school.

Extra-curricular activities are an integral part of the college and available to all young persons. Young persons are actively encouraged to attend and this can be supported where appropriate. This includes languages, sports, visual and performing arts. Inclusiveness in extra-curricular activities is important to the college.

## **11. Evaluating the success of provision**

In order to make consistent continuous progress in relation to SEND provision, the college encourages feedback from staff, parents and young persons throughout the year.

Young person progress will be monitored on a termly basis in line with the SEND Code of Practice and individual targets. Information about progress is recorded, tracked and analysed termly using **SISRA**. Parents are informed of progress at review meetings and through written reports.

The impact of intervention programmes is also tracked and reported annually to ensure programmes are appropriate in meeting young persons' needs and narrowing gaps.

As a minimum, an annual review meeting is held with parents and young persons to evaluate progress. The meeting will consider progress in curriculum subjects, comments by subject teachers, comments from allocated Learning Support as well as comments from parents and the young persons.

## **12. Complaints procedure**

The college's complaints procedure is outlined in the Complaints Policy, which is available on the college website or from the main office, on request.

The college is always happy to talk to parents and to listen to any concerns they may have. We operate an 'open door policy' and can be contacted at any time should a concern arise. Parents may speak to their young person's form tutor, Year Team, the SENCo or directly to

members of the Senior Leadership Team. We will always do our best to resolve any issues that are raised.

The SEND Code of Practice outlines additional measures the local authority must set up for preventing and resolving disagreements. These will be explained to parents and carers as required.

### **13. In-service training (CPD)**

The college aims to keep all college staff up to date with relevant training and developments in teaching practice in relation to the needs of young persons with SEND. The college offers all staff CPD opportunities and an annual programme of wider training across all phases of education.

The SENCo facilitates/signposts relevant SEND focused external training opportunities for all staff where a need is identified.

The college recognises the need to train *all* our staff on SEND issues. The SENCo, with the Senior Leadership Team, ensures that training opportunities are matched to college development priorities and those identified through the use of provision management.

All teachers undertake induction on taking up a post and this includes a meeting with the SENCO to explain the systems and structures in place around the school's SEND provision and practice.

The SENCO works closely with the Local Authority and attends meetings and training in order to keep up to date with local and national SEND updates.

### **14. Working in partnerships with parents**

Cowley International College firmly believes that developing a close working relationship with parents is vital in order to ensure;

- a) early and accurate identification and assessment of SEND leading to the correct intervention and provision
- b) continuing social and academic progress of a young person with SEND
- c) personal and academic targets are set and met effectively
- d) the safety and happiness / well-being of the young person

The college recognises that parents have a unique overview of their young person's needs and how best to support them, and that this gives them a key role in the partnership. The college considers parents of all young persons as valued partners in the process. Depending on age and appropriateness, all young persons will be encouraged to participate in the decision-making processes affecting them.

Parents are kept up to date with their young person's progress through progress reports, parent's evenings, provision reviews etc.

In cases where more frequent regular contact with parents is necessary, this will be arranged based on the individual young person's needs. The SENCo may also signpost parents of young persons to the local authority Information Advice and Support Service where specific advice, guidance and support may be required.

If an assessment or referral indicates that a young person has additional learning needs the parents and the young person will always be consulted with regards to future provision. Parents are invited to attend meetings with external agencies regarding their young person, and are kept up to date and consulted on any points of action drawn up in regards to the provision for their young person.

## **15. Links with other schools**

### **Transition**

In preparation for Transition from primary to secondary phase, the SENCo or appropriate member SEND Team will attend donor schools and liaise with the teaching staff thus producing a comprehensive overview of all the young persons for dissemination to teaching staff. This enables the school to plan appropriately for the new school year. It also gives parents the opportunity to liaise with secondary colleagues.

Year 6 young persons are invited to attend additional transition visits to become more familiar with the school setting and key members of staff. Information about strengths, difficulties and strategies are shared to allow One Page Profiles to be produced for distribution to teaching staff as appropriate.

At Year 9 reviews for SEND young person's formal transition plans are produced to determine the most appropriate routes to employment, further education, work-based training, higher education, and adult life. Where appropriate, the college will organise a Young person Centred Transition Review to ensure that an Action Plan is in place for Key Stage 4. Connexions interviews will be offered as part of this process.

SEND young persons are supported with transition to post-16 education through selection of appropriate courses, supported visits with staff, sharing of young persons' profiles and other relevant information with the new setting..

The college recognises that where a young person with an EHCP continues to attend education or training post 16, the Local Authority may decide to maintain the EHCP until age 19 or until the age of 25.

## 16. Links with other agencies and voluntary organisations

Cowley International College invites and seeks advice and support from external agencies in the identification and assessment of, and provision for, SEND. The SENCo is the designated person responsible for liaising with the following:

- ❖ Education Psychology Service
- ❖ Speech and Language Service
- ❖ Language and Learning Support Service
- ❖ Specialist Outreach Services

Representatives from voluntary organisations and other external agencies are invited to liaison meetings throughout the year to discuss SEND provision and progress and keep staff up to date with legislation.

In cases where a young person is under observation or a cause for concern, focused meetings will be arranged with the appropriate agency. Parents will normally be invited to and informed about any meetings held concerning their young person unless there are over-riding safeguarding issues.

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**Signed** \_\_\_\_\_ *[Name]* **(Executive Principal) Mr C Sheeran**

Date \_\_\_\_\_

**Signed** \_\_\_\_\_ *[Name]* **(SENCo) Mrs K MacKay**

Date \_\_\_\_\_

**Signed** \_\_\_\_\_ *[Name]* **(SEND Governor) Mrs M Bellis**

Date \_\_\_\_\_

**This policy will be reviewed annually.**