

SEND Policy

Moulton CEVC Primary School

Approved by: Full governing body

Date: 13.03.23

Last reviewed on: 14.03.22

Next review due by: Spring 2024

Chair of governor's signature



Ethos

Moulton CEVC Primary is an inclusive school, and the staff and governing body understand the legal and moral duty to support children with special educational needs or a disability in the school. This SEND policy is written to comply with the 2014 Children and Families Act and its SEN Code of Practice together with the Equality Act 2010.

The school works closely with colleagues from Suffolk's Special Education Services to seek expert advice on how best to coordinate a child's additional and special educational needs.

Defining Special Educational Needs, Differences and Disabilities

The Code of Practice (DfE, January 2015) states that:

A person has SEN if they have a learning difficulty or disability which calls for special educational provision to be made for him or her. At compulsory school age this means he or she has a significantly greater difficulty in learning than the majority of others the same age, or, 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. Taken from 2014 SEN Code of Practice: 0 to 25 Years.

Aims

The school is committed to using its best endeavours to provide an appropriate and high-quality education for all children which enables them to

- Achieve their best
- Become confident individuals living fulfilling lives
- Make successful transition to their next phase of education.

The school considers every teacher to be a teacher of every child, including those with special educational needs and disabilities. All teachers are expected to have the highest aspirations and expectations for all pupils, including those with special educational needs.

The school aims to create a community where parents and those working in school have a mutual trust and confidence in each other, created through clear, consistent approaches to communication and collaborative working, to enable outstanding outcomes for children with SEND.

All children, including those with special educational needs and disabilities, should have access to a broad, balanced academic and social curriculum, enabling all children to be included in all aspects of school life and feel equally valued and fully part of the school community

OBJECTIVES

The school is committed to the following:

- Strive to establish a fully-inclusive school, eliminate prejudice and discrimination and create an environment where all children can be happy, flourish and feel safe and happy to learn.
- Respond to learners in ways which take account of their varied needs and life experiences, moving away from an approach that locates a problem within the child, but means doing everything we can to meet a child's SEN.



- Work to ensure that staff are identifying a pupil's special educational needs at the earliest point and then making effective provision as this is known to improve long term outcomes.
- Work in close partnership with parents to achieve these aims. Parents should be seen as partners, participating as fully as possible in decisions and being provided with information and support necessary to enable this.
- Support pupils themselves to participate in discussions and express their views and be fully involved in decisions which affect them encouraging them to become increasingly effective self-advocates.
- Work in close partnership with a range of specialist agencies to enable access effective, targeted support.
- Provide support, advice and training for all staff working with pupils with special educational needs to enable them to be increasingly able to adapt teaching to respond to the strengths and needs of all pupils.
- Appoint a qualified Special Needs Coordinator(s) who will have responsibility for the day-to-day operation of the SEN policy and coordination of specific provision made to support individual pupils with SEN, including those who have Education Health Care (EHC) plans. For those new to the role, the school is committed to ensuring that staff have the required support and training, including statutory training.

The SEND team at Moulton

Inquiries about an individual child's progress should be addressed at first to the class teacher since he or she is the person who knows the child best. Other enquiries can be addressed to the school's temporary Special Educational Needs Coordinator, Deborah Shipp. In some instances, the SENCO will need to refer the concern to outside agencies for further support.

The school has a nominated SEND Governor, Nicola Sheail, who works as a 'critical friend' of the SENCO. They hold regular reviews, learning walks and opportunities to identify ways to drive the profile of SEND even further at Moulton CEVC.

We recognise the wider difficulties that a child with SEN may experience at home and in the community. For these pupils, the SENCO will work close with the leadership team to ensure a holistic approach to support.

Identifying a special educational need(s)

A pupil has SEN where their learning difficulty or disability calls for special educational provision to be made for them, that is provision different from or additional to that normally available to pupils of the same age. For some children, SEN can be identified at an early age. However, for other children and young people difficulties become evident only as they develop.

The identification of SEN is built into the overall approach to monitoring the progress and development of all pupils. Class teachers will assess each pupil's current skills and levels of attainment on entry, building on information from previous settings. Class teachers then make regular assessments of progress for all pupils identifying where pupils are making less than expected progress given their age and individual circumstances. Where a pupil's progress is causing concern, this may be characterised by progress which:

- is significantly slower than that of their peers starting from the same baseline
- fails to match or better the child's previous rate of progress
- fails to close the attainment gap between the child and their peers



- widens the attainment gap

It can include progress in areas other than attainment – for instance where a pupil needs to make additional progress with wider development or social needs.

The school does not diagnose conditions since this requires the expertise of medical professionals. Teachers should support parents in outlining their concerns and liaising with medical professionals. At times, it might be deemed appropriate for staff to speak with a medical professional with parents' permission to support their concerns

Broad areas of need as outlined in the SEND Code of Practice (2014)

These four broad areas give an overview of the range of needs that the school plans for and not to fit a pupil into a category. In practice, individual children or young people often have needs that cut across all these areas and their needs may change over time.

- Communication and Interaction
- Cognition and Learning
- Social, Emotional and Mental Health
- Sensory and/or Physical

The purpose of identification is to work out what action the school needs to take, not to fit a pupil into a category. In practice, individual children often have needs that cut across all these areas and their needs may change over time. In our school, the needs of the whole children will always be considered in this process.

There are other factors that may impact on progress and attainment that are not considered SEN:

- Attendance and punctuality
- Health and Welfare
- English as an additional language
- Being in receipt of pupil premium grant
- Being a 'looked after child'
- Being a child of a serviceman or service woman

Children with social, emotional and mental health needs

Behaviour is not classified as a SEN, but the school recognises that all behaviours are a means of communication. If a child shows consistent unwanted behaviours, the class teacher will assess the child's needs, considering family circumstances and the child's known history of experiences. If the child's behaviour is felt to be a response to trauma or to home-based experiences (e.g., bereavement, parental separation) we complete a CAF (Common Assessment Framework) with the family and support the child through that process.

If parents and school are concerned that the child might have mental health needs, we encourage parents to ask their GP for a referral to CAMHS (or to specialists within the Air Force medical services) or through the [Emotional Wellbeing Gateway](#) online self-referral service.



If the child is felt to have long term social, emotional or mental health needs- for example with anger management- the school offers a range of social skills or therapeutic interventions. These are generally delivered by experienced TAs who develop good, trusting relationships with the children.

All children's behaviour is responded to consistently in line with our Behaviour Policy, although reasonable adjustments are made to accommodate individual needs, where behaviour support plans are deemed necessary and run by staff, parents and potentially external agencies such as Special Education Services: Social, Emotional and Mental Health outreach team.

The school has a zero-tolerance approach to bullying, especially towards children with SEN and disabilities. We will actively investigate all allegations and, if there is cause, work with both the bully and the victim to improve their social skills.

THE GRADUATED APPROACH TO SEN SUPPORT

Moulton's graduated approach to SEND can be viewed more as a single page document on our school website on the SEND page under '[Parent Page](#)'.

The parents will be informed if the school is making special educational provision for a child.

Identifying and adapting teaching to meet pupils' needs is a process that is in place for all pupils. The school has a rigorous and regular system to identify where pupils are not making expected progress or working at a level significantly below age-related expectation. Class teachers will put in place if necessary, relevant and timely interventions, through quality first teaching, appropriate differentiation and in-class support, aimed at closing the gap or raising the attainment. The class teacher will also meet with parents to ensure there is a shared understanding of pupils' needs and to gain parental perspective on any emerging concerns and areas of strength.

The process of monitoring/assessment, planning and providing support in different ways will continue. Further school-based resources will be explored to determine and inform provision; this may include discussion with team leaders and the school's Special Educational Needs Coordinator.

Where a class teacher feels that a child's needs require further investigation, they should meet with the SENCO. At this meeting the requirement for additional fine-tuned assessments will be ascertained. Once completed, parents will be invited to attend a meeting to discuss the findings and share their perspective. Where appropriate, the child's views will be sought. If, as a result of this process, it is clear that different and additional provision is required to meet the child's needs, the child will then be placed on the school SEN record at 'SEN Support'.

Working together the SENCO, class teacher, parents and child (where appropriate) will select appropriate support and intervention to meet the outcomes identified for the pupil, based on reliable evidence of effectiveness. This will be delivered by staff with sufficient skills and knowledge. This SEN support will take the form of a four-part cycle (assess – plan – do – review) through which earlier decisions and actions are revisited, refined and revised with a growing understanding of the pupils needs and of what supports the pupil in making good progress and securing good outcomes. This is known as the Graduated Approach. It draws on more detailed approaches, more frequent reviews and more specialist expertise in successive cycles in order to match interventions to the SEN of a child.

The effectiveness of the support and interventions and their impact on the pupil's progress will be reviewed each term. The review process will include an evaluation of the impact and quality of the support and intervention and the views of the pupil and their parents. This review will then feed

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back into the analysis of the pupil's needs. The class teacher, with support from the SENCO where needed, will revise the support in light of the pupil's progress and development, deciding on any changes to the support and targeted outcomes, in consultation with the parent and pupil.

The school can involve specialists at any point for advice regarding early identification and effective support. However, where a pupil continues to make less than expected progress, despite evidence-based support and interventions that are matched to the pupil's area of need, the school will consider involving specialists, including those secured by the school itself or from outside agencies. Parents will always be involved in any decision to involve specialists, along with the child's class teacher and in appropriate cases, the child them self. Specialist agencies will only be contacted where parents agree. It is the SENCO's role to contact any specialist agencies and ensure that the involvement of specialists and what was discussed or agreed is recorded and shared and fully understood by parents, teaching staff and, where appropriate, the child. The involvement of specialists and what was discussed or agreed will be recorded and shared with the parents and teaching staff supporting the child.

Examples of specialist agencies used by and that are available to be used by the school

- ADHD Service
- Child Health Centre
- Child Development Centre
- Early Help (Social Services)
- Educational psychologists
- Emotional Wellbeing Gateway
- NHS Speech and language therapist
- Independent Speech and Language Therapist
- Occupational therapist
- Physiotherapists
- School Nursing Service
- Special Education Services: Cognition and Learning
- Special Education Services: Communication and Interaction
- Special Education Services: Physical and Sensory
- Special Education Services: Social Emotional and Mental Health
- Sensory and Communication Service (Hearing Impairment)

In some cases, there is a charge for accessing specialist agency support; funding for which will come from the school's notional SEN budget and will be monitored by the SENCO and Head teacher.

Where pupils hold an Educational Health Care Plan, the school will work in close partnership with any specialist agencies named on the plan to provide support and specialist advice.

The Local Authority SEN Support Plan and Education Health and Care Plan process

Where the special educational provision required to meet the child or young person's needs cannot reasonably be provided from within the resources normally available to the school, the school, in consultation with parents, will consider requesting a LA SEN Support Plan or Education, Health and Care Needs Assessment from the Local Authority where appropriate. To inform this decision, the SENCO will have close regard to the local authority's criteria for funding through an SEN Support Plan or for an EHC Plan assessment. This can be found on the Suffolk Local Offer web site along with information on the EHC plan coordinated assessment process and will be shared in full with parents to ensure they are confident and clear about what the process and how they are involved in it.



Removing pupils from the SEN register

In consultation with parents, the child will be considered for removal from the SEND register where he / she has made sustained good progress that:

- better the previous rate of progress and has sufficiently closed the attainment gap between the child and their peers of the same age,
- or where a child's wider development and /or social needs have improved and progress in the targeted area is considered to be sustained, and SEN Support is no longer required to ensure this progress is sustained.

SUPPORTING PARENTS/CARERS OF CHILDREN WITH SEN





Supportin SEND



Worried your child may be struggling?

Step 1



Talk

- Check in with the class teacher, they know your child best.
- Ask for a telephone appointment with the teacher.
- Email your query: admin@moulton.suffolk.sch.uk

Step 2



Look

- The teacher will make observations and assessments.
- The teacher and the SENCO will talk through the findings.
- The teacher will teach to the gaps and review after a term.

Step 3



Try

- Reasonable adjustments may be made in class.
- Your child may be enrolled in to an intervention group.
- An online intervention programme may be set up.

Worried your child may have SEND?

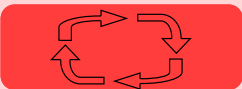
Step 4



Identify Special Educational Need

- In-school screenings may be done to look for specific difficulties.
- Referral to health professionals may be made with parents.
- SENCO may seek advice from an outside agency.

Step 5



Assess-Plan-Do-Review

- Parents, teacher and child will set up a written plan.
- The SENCO will advise on the contents of the plan.
- Plan reviewed half-terminly by all to ensure good progress or better.

Significant, Long-Term SEND



Request an EHCP

- Repeat steps 4 and 5 twice, building evidence.
- Actively work with multiple specialists on specific strategies
- Place a referral for an Education, Health and Care Plan

The school is fully committed to a meaningful partnership with parents of children with special educational needs where they can be as fully involved as possible in decisions and are provided with the information and support necessary to enable participation in those decisions.

The school will do this by:

- Always making parents feel welcome and actively listening to their concerns, wishes and aspirations for their child, instilling confidence and building effective partnerships.
- Providing all information in an accessible way
- The SENCO being available for meeting by appointment through the school office, by email at head@moulton.suffolk.sch.uk, or a request for a brief telephone consultation.



- Publishing the school implementation of the SEND Policy on the school website following the information set out in the SEN information regulations (2014) and as part of the school's contribution to the Local Offer.
- Class teachers meeting with parents, in addition to parent evening appointments, to discuss concerns regarding pupils' progress at the earliest opportunity, raised either by the class teacher or the parents themselves.
- Where children require 'Individual Support Plans', class teachers will invite parents to a discussion half termly to set and review targets. They will discuss the activities and support that will help them and identify the responsibilities of the parent, the pupil and the school. It will provide an opportunity for the parents to share their views.
- The school will ensure that teaching staff are supported to manage these conversations as part of their professional development.
- Support and guide parents in ways that they can help with their child's learning and development at home.
- A record of the outcomes, action and support agreed through the discussion are kept and shared with all the appropriate school staff and a copy will be given to the pupil's parents.
- Signposting parents to wider support, information and services pertinent to their child's SEN by ensuring they know how to access the [Local Offer](#) and the [Suffolk Parent Carer Network](#).
- Planning in additional support for parents at key times, for example, when considering and making a referral for a coordinated assessment for an EHC plan and to ensure smooth and successful transition into the school or to next phase of education.
- Making use of media such as email to contact parents and for parents to contact school in line with the school's communication policies, online safety policies, data protection policies and child protection and safeguarding policies.
- Seeking parents' views through periodic questionnaires and considering adjustments to practice in the light of analysis.



We encourage parents to make use of the [*Special Educational Needs and Disabilities Information Advice and Support Service \(SENDIASS\)*](#), which is specifically for parents and carers of children with SEN. Information from SENDIASS, including upcoming courses, is shared with all parents.

SUPPORTING PUPIL VOICE

The school recognises that all pupils have the right to be involved in making decisions and exercising choice. We aim to develop pupils' self-advocacy skills to enable them to transfer to their next phase of education confident and able to communicate, convey, negotiate or assert their own interests, desires, needs, and rights becoming increasingly able to make informed decisions about their learning and future and take responsibility for those decisions.

How the school will support pupil voice:



- Self-knowledge is the first step towards effective self-advocacy so, with parents, the school will support pupils to understand their strengths, needs and approaches to learning that are particularly successful for them and to have the confidence to voice their concerns, hopes and aspirations.
- Wherever possible and in an age-appropriate manner, pupils with SEN are involved in monitoring and reviewing their progress and as fully as possible in making decisions about future support and provision. Pupils' views are recorded and shared through One Page Profiles and 'What I feel' questionnaire that can be completed with parents at home.
- All staff will actively listen to and address any concerns raised by children themselves.
- Pupils with SEND are encouraged to stand for election to the School Council.
- Planning in additional support for pupils at key times, for example, when considering and making a referral for a coordinated assessment for an EHC plan and to ensure smooth and successful transition into the school or to next phase of education.
- Pupils are also provided with additional support to contribute as fully as possible in their Annual Review. This can be, for example, by attending part of the review meeting in person, preparing a statement to be shared at the meeting, using a peer advocate to support them in the meeting or by preparing a recorded presentation to share at the meeting.
- Seeking pupils' views through regular questionnaires / group interview activities undertaken by the SENCOs and / or SEND Governor, considering adjustments to keep in the light of analysis.

SUPPORTING PUPILS AT SCHOOL WITH MEDICAL CONDITIONS

The school recognises that pupils at school with medical conditions should be properly supported so that they have full access to education, including school trips and physical education. Some children with medical conditions may be disabled and where this is the case the school will comply with its duties under the Equality Act 2010.

Some may also have special educational needs (SEN) and may have a statement, or Education, Health and Care (EHC) plan which brings together health and social care needs, as well as their special educational provision where the SEN Code of Practice (2014) is followed. The arrangements in place in schools to support pupils at school with medical conditions are detailed within the school's Medical Conditions Policy and are available to view on this website.

In September 2014, a new duty from the Children and Families Act 2014 came into force for governing bodies to make arrangements to support children at school with medical conditions. The aim of this policy is to make sure that all children with medical conditions (both physical and mental) are properly supported in school so that they can play a full and active role in school life, remain healthy and achieve their academic potential.

MONITORING AND EVALUATION OF SEN

The school regularly and carefully monitors and evaluates the quality and effectiveness of provision for all pupils including those with SEN. This is done through scrutiny of data related to the achievement of pupils with SEN, work scrutiny, observation and sampling of parent and pupil questionnaires. The school's SEN Governor also has a role in scrutinising the findings of the school's self-evaluation and relevant, national data as part of the governing body's process of monitoring the effectiveness of the school's SEN Policy.



The SENCO produces an Information Report at the end of the academic year, which is available to view on the school's website under '[SEN Information Report](#)'. Within the report you will see Moulton figures against the national office for statistics data; specific details of services collaborated with; staff training and coaching, and the specifics of the funding received and how it has been invested in SEND provision. It is available as a summary page on the school's website under '[SEND Information Report Summary Page](#)'.

TRAINING

In order to maintain and develop the quality of teaching and provision to respond to the strengths and needs of all pupils, all staff are encouraged to undertake training and development. Courses and training needs are matched to the identified primary needs within the school, responsive to whole school trends and specific needs for complex children.

Training needs of staff are identified through the school's self-evaluation appraisal processes.

All teachers and support staff undertake an induction process 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 and to discuss the needs of individual pupils.

The school's SENCO will attend (SENCO Network meetings, SEND Forums run by SEND Services and training) in order to keep up to date with local and national updates in SEND.

FUNDING FOR SEN AND ALLOCATION OF RESOURCES

The school's core budget is used to make general provision for all pupils in the school including pupils with SEN. In addition, every school receives an additional amount of money to help make special educational provision to meet children's SEN. This is called the 'notional SEN budget'.

The amount in this budget is based on a formula which is agreed between schools and the local authority. The school can also make applications to the local authority for High Needs Funding -this will be made after careful consideration is given with regards to the pupil's needs which might be deemed requiring 'top-up funding' to support their provision.

BAND	AMOUNT
Band A and Band B	0
Band C	£1,500
Band D	£3,300
Band E	£5,500
Band F	£8,200
Band G	£10,500
Band H	£13,000
Band I	This is funding agreed on an individual basis when costs are more than £16,000

Where needed, pupils in mainstream settings are usually awarded bands C, D or E.

The school may also use of Pupil

Premium Funding where a pupil is registered as SEN and is also in receipt of Pupil Premium grant to address the needs of these pupils and enhance learning and achievement.

Each term, in consultation with the head teacher and class teachers, the SENCO will map the targeted provision in place for pupils on the SEN record to show how resources are allocated and to monitor the cost of the whole of our SEN provision. This targeted provision is outlined on the school's provision map.

ROLES AND RESPONSIBILITIES

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SENCO

The key responsibilities of the SENCO are taken from the SEND 0- 25 Code of Practice (DfE, January 2015) and include:

- overseeing the day-to-day operation of the school's SEN policy
- coordinating provision for children with SEN
- liaising with the relevant Designated Teacher where a looked after pupil has SEN
- advising a on the graduated approach to providing SEN support
- advising on the deployment of the school's delegated budget and other resources to meet pupils' needs effectively
- liaising with parents of pupils with SEN
- liaising with early years providers, other schools, educational psychologists, health and social care professionals, and independent or voluntary bodies
- being a key point of contact with external agencies, especially the local authority and its support services
- liaising with potential next providers of education to ensure a pupil and their parents are informed about options and a smooth transition is planned
- working with the head teacher and school governors to ensure that the school meets its responsibilities under the Equality Act (2010) with regard to reasonable adjustments and access arrangements
- ensuring that the school keeps the records of all pupils with SEN up to date, responsive to new information as it is presented/ received. This is available to all staff, who are alerted of updates at the weekly pupil update meetings.

Governing Body and Head teacher

The lead governor for SEND is Nicola Sheail. The governing body will, in line with SEN Information Regulations, publish information on the school's website about the implementation of the school's policy for pupils with SEN, the SEN Information Report. The information published will be updated annually and any changes to the information occurring during the year will be updated as soon as possible.

A member of the governing body is appointed to have specific oversight of the school's arrangements for SEN and disability and to ensure that the full governing body is kept informed of how the school is meeting the statutory requirements

The teacher, SENCO and governing body will establish a clear picture of the resources that are available to the school and will consider the strategic approach to meeting SEN in the context of the total resources available, including any resources targeted at particular groups, such as the pupil premium.

Head teacher will ensure that the SENCO has sufficient time and resources to carry out her functions. This will include providing the SENCO with sufficient administrative support and time away from teaching to enable them to fulfil their responsibilities.

STORING AND MANAGING INFORMATION

All records containing special category data relating to the special educational needs or disabilities of pupils in school will be treated as highly confidential and be securely placed in a locked cabinet when not in use.



The same confidential and secure approach applies to information shared with outside agencies by telephone, email or letter.

The school's policy on data protection is available to view on the website.

Suffolk's Local Offer

The purpose of the local offer is to enable parents and young people to see more clearly what services are available in their area and how to access them. It includes provision from birth to 25, across education, health and social care. Suffolk's Local Offer is available from the website



In addition, <https://www.access-unlimited.co.uk/> is the *One Stop Shop* for Suffolk children and young people with additional needs and disabilities. It includes information about activities and breaks available for Suffolk children with SEND as well as information for parents about benefits, about how Suffolk aims to support children through education, health and social care.

Suffolk SEND Services have published a handy one-page summary of how a child may be supported by the local offer in conjunction with the school...





Stage 1 : CYP not making expected progress

Initiate APDR Cycle (Assess, Plan, Do, Review)

Assess

- Discussion with key staff in the educational setting to build profile of need
- Capture CYP and parent/carer views
- Gather and analyse assessment information, based on observations, current attainment, formal and informal assessments

Plan

- Work together to create a time-limited support plan, utilising whole school approaches, high quality inclusive teaching and differentiation
- Use the categories of need descriptors to help inform planning

Do

- Put in place the agreed adjustments, support and intervention, with the SENDCo supporting teachers with implementation, linking interventions to classroom teaching.
- Agree date of review

Review

- Review the quality, effectiveness and impact of the provision, involving the CYP and their parent/carers

The APDR cycle then starts again with the updated information.

Stage 2 : CYP not making expected progress

- Seek support from the Specialist Education or Psychology & Therapeutic Services Core Offer
- Seek support for CYP and whole school approaches through a SEND Support Consultation. This could lead to a SENDCo Support visit to your school and/or an Educational Psychology Analysis of Additional Needs (AANT)
- Explore the SCC Traded Offer for training and additional support
- Refer to external agencies (e.g. Health, Mental Health, Early Help, Social Care)
- Consider an application for High Needs Funding

The ADPR cycle then starts again with the updated information.

Stage 3 : CYP continues not to make expected progress

- Review the impact of interventions, involving the CYP and their parent/carers
- Review the impact of the SEND funding in place
- Consider a referral to the Multi Agency Assessment Programme (MAAP)
- Consider a request for an Education Health Care Needs Assessment

For more information and resources, visit:

www.suffolklocaloffer.org.uk
www.sendgateway.org.uk
www.suffolksendiass.co.uk

www.spcn.org.uk
www.schoolschoice.org
SENDIASS Training

SEND Code of Practice (2015)
www.nasen.org.uk
SCC Inclusion Referral Form

**We have used CYP to indicate children and young people aged 0-25*

Equal Opportunities

The school is committed to providing equal opportunities for all, regardless of race, faith, gender or capability in all aspects of school. We promote self and mutual respect and a caring and non-judgmental attitude throughout the school

Complaints

The school works, wherever possible, in partnership with parents to ensure a collaborative approach to meeting pupils' needs.

All complaints are taken seriously and are heard through the school's complaints policy and procedure.



