

Lord Deramore's Primary School



SPECIAL EDUCATIONAL NEEDS and DISABILITY INCLUSION POLICY

**(including statement relating to Looked After and
Previously Looked after Children)**

**To be read in conjunction with the
Special Educational Needs Information Report
On the School's website**

July 2022

COMPLIANCE

This policy and the related SEND Information Report is based on the statutory [Special Educational Needs and Disability \(SEND\) Code of Practice](#) (January 2015) and the following legislation:

[Part 3 of the Children and Families Act 2014](#), which sets out schools' responsibilities for pupils with SEND and disabilities

[The Special Educational Needs and Disability Regulations 2014](#), which set out schools' responsibilities for education, health and care (EHC) plans, SEND co-ordinators (SENDCos) and the SEND information report

AIMS

Our SEND policy and information report aims to:

- Set out how our school will support and make provision for pupils with special educational needs (SEN) including the needs of Looked After and Previously Looked After Children
- Explain the roles and responsibilities of everyone involved in providing for pupils with SEN

1. RATIONALE

Lord Deramore's Primary School is committed to inclusion and aspires to engender a sense of community and belonging. All children and families in our school community are equally valued. We aim to eliminate prejudice and discrimination in an environment where all children can flourish and feel safe.

Our child and family centred approaches aim to offer equality of opportunity to all learners, including those with special educational needs and disabilities and those whose early life experiences have had a negative impact on their learning and wellbeing. We aspire to identify, assess and meet individual needs such that each child receives the support they need to access the rich curricular and social opportunities offered by our school, and to reach their full potential.

In relation to this policy, we are mindful of identifying needs and making appropriate provision for those whose academic and life outcomes may be compromised by:

- their learning differences (including being a more able learner) or disabilities
- being looked after by the local authority or adopted from care
- being at risk of disaffection and exclusion
- having social, emotional and mental health difficulties
- having physical disabilities.

At Lord Deramore's we aim to ensure that:

- every child achieves their full academic and social potential
- SEND needs are identified as early as possible and appropriate provision is put in place to ensure continuing progress, development and wellbeing
- children with SEND are given full access to a broad, balanced and relevant education within the Foundation Stage and the National Curriculum
- children with SEND are able to take a full part in all aspects of school life, both within and outside the classroom
- parents of children with SEND are informed, supported and involved in their children's education and are able to contribute towards their ongoing development
- the views and wishes of the child concerned are taken into account according to their age and understanding
- all staff working in the school share in the responsibility of meeting the needs of the children with SEND
- school staff working with children with SEND are informed, supported and trained in ways of assisting children and addressing their future development
- resources are made available to support the education of children with SEND and used effectively for that purpose
- the school raises awareness and understanding of children with SEND across the school community and fosters a positive attitude towards and a supportive environment for such children
- the effectiveness of the school's policy and provision for SEND is kept under regular review.

In addition, we recognise that pupils learn at different rates and that a child's age, stage of development and emotional maturity will affect achievement. We are particularly aware of the needs of our Early Years and Key Stage 1 pupils, for whom maturity is a crucial factor in terms of readiness to learn. In our school, we aim to identify these needs as they arise and provide learning and teaching contexts which enable every child to achieve their full potential.

2. DEFINITIONS

- Special educational provision is educational or training provision that is additional to, or different from, that made generally for other children or young people of the same age by mainstream schools.
- A pupil has SEND if they have a learning difficulty or disability which calls for special educational provision to be made for them.
- They have a learning difficulty or disability if they have either:
 - A significantly greater difficulty in learning than the majority of their peers
 - A disability which prevents or hinders them from making use of facilities of a kind generally provided for others of the same age in mainstream schools

3. ROLES AND RESPONSIBILITIES

Provision for children with special educational needs is a matter for the school as a whole and all members of staff share in the responsibility of meeting those needs.

3.1 The Special Educational Needs Coordinator

The Special Educational Needs Coordinator (SENDCo) is **Mrs. Jane Hitchon** (jhitchon@lordderamores.com)

She will:

- Work with the headteacher and SEND governor to determine the strategic development of the SEND policy and provision in the school
- Have day-to-day responsibility for the operation of this SEND policy and the co-ordination of specific provision made to support individual pupils with SEN, including those who have EHC plans
- Provide professional guidance to colleagues and work with staff, parents, and other agencies to ensure that pupils with SEND receive appropriate support and high-quality teaching
- Advise on the graduated approach to providing SEND support
- Advise on the deployment of the school's delegated budget and other resources to meet pupils' needs effectively
- Be the point of contact for external agencies, especially the local authority and its support services
- Liaise with potential next providers of education to ensure that our school meets its responsibilities under the Equality Act 2010 with regard to reasonable adjustments and access arrangements
- Ensure the school keeps the records of all pupils with SEND up to date
- Teach groups and individuals with SEND (dependant on need and capacity)
- Liaise with parents of children with SEND
- Maintain a range of resources and teaching materials to enable appropriate provision to be made
- Keep informed of current developments with special education through continued professional development
- Contribute to the in-service training of staff

3.2.The SEND Governor

The SEND Governor, **Mrs. Sue Perutz**, will:

- help to raise awareness of SEND issues at governing body meetings
- monitor the quality and effectiveness of SEND provision within the school and update the governing body on this
- work with the head teacher and SENDCo to determine the strategic development of the SEND policy and provision in the school

3.3. The head teacher

The head teacher, **Mr. James Rourke**, will:

- work with the SENDCo and SEND governor to determine the strategic development of the SEND policy and provision within the school
- have overall responsibility for the provision and progress of learners with SEND and/or a disability
- ensure he is informed of all SEND provision via the SENDCo.

3.4 Class teachers

Each class teacher is responsible for:

- The progress and development of every pupil in their class
- Working closely with any teaching assistants or specialist staff to plan and assess the impact of support and interventions, and how they can be linked to classroom teaching
- Working with the SENDCo to review each pupil's progress and development and decide on any changes to provision
- Ensuring they follow this SEND policy
- Directly liaising with parents of children with SEND
- Contributing to EHCP and MSP review meetings

3.5 Teaching Assistants

TAs should:

- be fully aware of the school's SEND policy and the procedures for identifying, assessing and making provision for pupils with SEND
- work as part of a team with the SENDCo and the teachers supporting pupils' individual needs and ensuring inclusion of pupils with SEND within the class
- contribute to the assess, plan do and review SEND provision cycle

4. ADMISSION ARRANGEMENTS

Lord Deramore's Primary School strives to be a fully inclusive school. All pupils are welcome, including those with SEND. When applying for a place at the school, parents are encouraged to share with the Head Teacher and SENDCo any special educational needs that have already been identified in their child. The school will then try to ensure that appropriate provision (which can be supported by the City of York's Specialist Teaching Teams and NHS services) is in place to support the child on entry and throughout their time

at the school. If at any point it is felt that a mainstream place within our school is not in the best interest of the child (or could pose a significant impact on the education of others), this will be discussed with parents/carers and with the local authority.

5. SEND PROVISION (See also SEND Report on Website)

5.1 : Categories of Special Educational Needs and Disabilities

We can provide additional and/or different provision for a range of needs, including:

- Communication and Interaction Needs including difficulties related to Autistic Spectrum Condition (from low level support to provision for high needs) and Speech and Language delay or disorders.
- Cognition and Learning - this includes children who demonstrate features of Specific Learning Difficulties such as dyslexia, dyscalculia, or dyspraxia, or who have General/Multiple Learning Difficulties ranging from moderate to more severe.
- Social, Emotional and Mental Health difficulties, which includes Attention Deficit Hyperactivity Disorder (ADHD) and difficulties related to attachment and early trauma
- Sensory and/or physical needs, for example, visual impairments, hearing impairments, processing difficulties, epilepsy

5.2: Identifying pupils with SEND and assessing their needs

A range of evidence including information concerning progress in areas other than academic attainment e.g. social and emotional development is considered when identifying the nature and level of a child's needs. This includes:

- Information about attainment and progress from previous settings
- Information from parents/carers
- Information from class teachers based on observations and from the regular assessments of all children in the class which will identify children whose progress:
 - 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
- Information from specific assessments carried out by the SENDCo or outside agencies (Educational Psychologist, NHS Occupational Therapist, NHS Speech and Language service, Child and Adolescent Mental Health Service etc.)

*Slow progress and low attainment, persistent disruptive or withdrawn behaviours or poor concentration will not automatically mean a pupil is recorded as having SEND. The decisions as to whether to put a child on the school's SEND register and whether their needs can be met by adapting our core offer, or whether something different or additional is needed will be made in consultation with the SENDCo and with reference to the **City of York Special Educational Needs Banding Documents**.*

Care will be taken in identifying and assessing SEND for children whose first language is not English; difficulties related solely to limitations in English as an additional language will not be identified as SEND.

5.3 Consulting and involving pupils and parents

Parents are always informed when a child is identified as having SEND and parental consent is sought before a child is put on the SEND register. At Lord Deramore's we aim to work in partnership with parents at every stage of SEND provision process with a view to ensuring that:

- we develop a holistic understanding of the pupil's areas of strength and difficulty
- we take into account the parents' concerns and when reasonable/possible accommodate their wishes
- everyone understands the agreed outcomes sought for the child

- everyone is clear on what the next steps are
- as far as possible there is a continuity of approach between school and home

For children requiring the higher levels of support and/or involvement from other agencies, or with an EHCP, the targets for the term will be discussed with parents, together with an evaluation of their child's progress against previous targets. Parents are welcome to make a contribution towards the evaluation and target setting. Minutes of formal review meetings will be made and recorded in the My Support Plan or Education and Health care plans and or logged on our school systems.

Children with SEND often have a unique knowledge of their own needs and circumstances and their own views about what sort of support would most help them. At Lord Deramore's we seek to show sensitivity and respect in listening to children and to take their views into account in planning provision.

We encourage self-evaluation and involvement in target setting and completion of a pupil passport. We recognise the importance of the child having understanding and ownership of their targets if they are to work actively towards achieving them. Pupils are supported to contribute to their review meetings as fully as possible. Their views are always recorded in their plans before the meetings. Often, they attend part of the meeting and share their achievements with a film, presentation or, depending on their individual strengths and difficulties, to answer questions or express their views directly.

5.4 Assessing and reviewing pupils' progress towards outcomes

We will follow the graduated approach and the four-part cycle of **assess, plan, do, review**. The class teacher will work with the SENDCo to carry out a clear analysis of the pupil's progress against desired outcomes. This will draw on:

- The teacher's and teaching assistant's assessment and experience of the pupil
- Their previous progress and attainment or behaviour
- The individual's development in comparison to their peers and national data
- The views and experience of parents
- The pupil's own views
- Advice from external support services, if relevant
- Information from specific assessments carried out by the SENDCo or outside agencies
- Information from Engagement Model assessments and Cherry Garden Tracker (for children operating below KS1 standards where most or all of their learning is non subject specific)

Provision and progress of children on the SEND register will be reviewed termly. For pupils with an EHCP (Education, Health and Care Plan), one of these reviews must be a formal annual review meeting which is used to update the EHCP before it is submitted to the Local Authority Special Educational Needs Department. A Provision Map is used to record additional provision for pupils on the SEND register.

All teachers and support staff who work with the pupil will be made aware of their needs, the outcomes sought, the support provided, and any teaching strategies or approaches that are required. We will regularly review the effectiveness of the support and interventions, and their impact on the pupil's progress.

5.5 Supporting Transition

At Lord Deramore's we are mindful of the positive impact of good transition support on pupil progress and well-being. Practice to support transition within school or into new settings includes:

- SEND transition meetings between previous and new teachers/settings to ensure information about the child's personality, needs and provision is shared
- Collation of all plans, specialist reports etc., to be passed up with the pupils in addition to digital copies being filed on the system
- Provision of individually tailored Social Stories/transition books for children who struggle with the social and emotional aspects of change

- Additional supported transition visits to secondary settings are arranged for children with SEND

5.6 Our approach to teaching pupils with SEND.

Teachers are responsible and accountable for the progress and development of all the pupils in their class.

High-quality teaching is our first step in responding to pupils who have SEND. This will be differentiated for individual pupils and may include the use of specific interventions such as the Nessy programme for reading and spelling. We aim to be highly flexible and creative in our approach to teaching children with SEND, and where necessary develop highly personalised provision. We are committed to following the frameworks advocated by the City of York's Specialist Teaching Teams (such as the SCERTS model and Communication Friendly Practice) but within these parameters we seek to meet individual needs, not just an SEND label.

5.7 Adaptations to the curriculum and learning environment (See also our Accessibility Plan)

We make a wide range of adaptations to ensure all pupils' needs are met and that disabled pupils are increasingly able to participate in the curriculum. These adaptations include:

- Differentiating our curriculum, for example, by grouping, offering 1:1 work, using a multi-sensory teaching style etc.
- Adapting our resources and staffing for example providing children with difficulties relating to attachment and trauma with a key worker and where possible ensuring continued contact throughout school
- Using recommended aids, such as laptops, coloured overlays, dyslexia friendly fonts and backgrounds, visual timetables, task sheets etc
- Differentiating our teaching, for example, giving longer processing times, pre-teaching of key vocabulary, reading instructions aloud, etc.
- Maintaining an autism friendly school environment—calm consistent colour scheme, low lighting areas, calming sensory room, access to green spaces, absence of bells or electric hand driers.
- Attachment friendly behaviour policy

5.8 Additional support for learning

We have 11 teaching assistants who are trained to deliver interventions for children with SEND. This support may be in the form of small group or on a one-to-one basis. SEND work with TAs may be directed and monitored by the class teacher and SENDCo and/or by other professionals such as Speech and Language Therapists, Occupational Therapists, CYC Specialist Teachers or the school's well-being worker. Sometimes children with SEND will work directly with the SENDCo on a one-to-one or small group basis. Children who receive funding for additional support via their EHCP will have additional adult hours allocated to their class and will receive one-to-one learning support as needed, but they will not necessarily have a named one-to-one TA. This is to prevent a child becoming overly dependent on one adult and to encourage the development of independent learning skills.

5.9 Expertise and training of staff

Our staff have considerable expertise and training with regard to SEND provision. Our SENDCo, who has attained a National Award for Special Educational Needs Coordination and an ELKLAN qualification in Speech and Language support, has 10 years' experience in this role and previously worked as an SEND teacher. She is allocated 2.5 hours a week to manage SEND provision.

We have a team of 5 teaching assistants with specialist SEND experience and knowledge. Continuing staff development focuses on increasing awareness of inclusion issues and on the variety of teaching strategies and learning resources available, for example training on the Wellcomm Early Years Speech and Language toolkit and on Little Wandle phonics catch-up interventions.

All staff are provided with regular opportunities for training courses related to the needs of the children they are working with or to prepare for particular intervention programmes. For example, staff routinely access SCERTS based autism training from our CYC Autism Specialist Teaching Team. Training on specific needs such as Dyslexia, Dyscalculia and Attachment Difficulties is regularly delivered by the SENDCo. In addition, the SENDCo attends specialist training and disseminates information to the staff. From time-to-time members of external agencies and support services may hold training sessions for the whole staff on particular SEND issues for example Comic Strip Conversations training to support children with ASC to develop social communication skills.

5.11 Evaluating the effectiveness of SEND provision

We evaluate the effectiveness of provision for pupils with SEND in a number of ways including:

- reviewing pupils' individual progress towards their goals each term via pupil passports, My Support Plans and EHCP reviews
- reviewing the impact of specific interventions
- using pupil questionnaires
- monitoring of classroom practice by the SENDCo senior leadership and subject coordinators
- analysis of pupils tracking data and test results for individuals and cohorts of children including through PIVATS and/or Cherry Garden tracking tools
- monitoring engagement using engagement model resources
- using specific assessments such as the GL Dyslexia Portfolio
- monitoring of procedures and practice by the SEND governor
- annual Report to Parents
- school self-evaluation
- the School Development Plan and SEND Action Plan

5.12 Enabling pupils with SEND to engage in activities available to those in the school who do not have SEND

We are committed to doing all that is possible to ensure there are no barriers to our pupils with SEND enjoying the same activities as other pupils in our school. To this end:

- all of our extra-curricular activities and school visits are available to all our pupils, including our before-and after-school clubs
- all pupils are encouraged to go on our day and residential trips – supported by social stories, additional staff etc.
- all pupils are encouraged to take part in sports day, school plays, special workshops etc. No pupil is ever excluded from taking part in these activities because of their SEND or disability
- we strive to maintain and improve a physical environment which enables disabled pupils to take better advantage of the education, benefits, facilities, and services we provide (see our accessibility plan)

5.13 Support for improving emotional and social development

At Lord Deramore's we believe that good mental health and social skills are the keystones to learning for all pupils including those with SEND. Support for pupils to improve their emotional and social development includes:

- all staff striving to build strong, nurturing relationships with children and to build open and trusting relationships with parents so that problems can be recognised and addressed at an early stage and referred to the SENDCo and ELSAs (Emotional Literacy Support Assistants)
- keeping a register of vulnerable children and coordinating support via SENDCo. This may involve accessing interventions led by the ELSA's and/or with parental consent a referral to the school's Well-being Service worker
- having an attachment friendly, relational behaviour policy which uses empathy and emotion coaching approaches to help children learn to self-regulate and to eliminate the stress of traditional behaviourist discipline methods which are particularly

detrimental to children with social and emotional difficulties relating to attachment and early trauma (see our Behaviour Policy)

- encouraging pupils with SEND to be part of the school council, to become play leaders etc.
- supporting pupils with SEND to access clubs such as Circle of Friends Groups within school and referring and sometimes funding access to clubs and groups outside school
- creating individual behaviour plans for children who struggle to regulate and working with parents to develop positive parenting strategies
- fostering a culture in which all differences including learning differences are understood and respected and in which bullying is promptly addressed (See our anti-bullying policy)

5.14 Working with other agencies

The Lord Deramore's SEND team routinely work with a range of other agencies to ensure all our children with SEND and their families receive the expert support they need. These agencies include:

- NHS Speech and Language Therapy services – assess, plan for and review children with Speech language and |Communication needs – advise school and families about intervention work- offer training
- NHS Paediatric Occupational Therapy Service – assess children and advise school and families for sensory issues, dyspraxia etc. – offer training
- CYC Healthy Child Service – support around health issues including eating concerns
- CYC Educational Psychology Service – termly reviews held with SENDCo – advice given – carry observations and assessments in particular to support statutory Assessment for EHCP requests – offer staff training
- CYC Specialist Teaching Teams, including:
 - outreach work from Haxby Road specialist provision for Speech, Language and Communication Needs – support for individuals and training and guidance on universal communication friendly practice
 - Autism team – regular observation visits, advice, resources and training on SCERTS model autism support -support for families
- Voluntary sector organisations including Young Minds and Young Carers
- CYC Schools Well-being Service – provide support and guidance for our Emotional Literacy Support Assistants (ELSAs) and offer some direct work and training
- Child and Adolescent Mental Health Service (CAMHS) – assess for ASC, ADHD etc. and persistent mental health needs

5.15 Complaints about SEND provision

Lord Deramore's Primary School recognises that the partnership with parents is crucial to the progress of all pupils. Therefore, parents are encouraged to consult the class teacher or SENDCo to discuss any concerns or problems. However, if there is a complaint regarding the SEND provision for a child the following steps should be taken:

- Discuss the matter with the class teacher and/or the SENDCo.
- If the problem is not resolved arrange a meeting with Mr Rourke, the Head Teacher. It may be appropriate for others to be involved in the meeting (e.g. the class teacher, SENDCo or other professionals). You can also speak with the SEND Governor, Mrs Sue Perutz. We will make every effort to resolve the matter in school.
- If the problem still remains unresolved you can meet with a representative of the Local Authority. Contact a member of the SEND department on 01904 554320 or emailing SENdept@york.gov.uk to arrange this.

York Special Educational Needs and Disability Information, Advice and Support Service (SENDIASS) (formerly known as York Parent Partnership Service) provides information, advice and support to parents, carers, children and young people in relation to Special Educational Needs and Disability (SEND) and related health and social care issues <https://www.york.gov.uk/SENDIASS>.

The service is free and can be provided over the telephone, during home visits or through

support at meetings concerning SEND and disability and is able to support parents at any point in the complaints procedures.

Parents of pupils with disabilities have the right to make disability discrimination claims to the first-tier SEND tribunal if they believe that our school has discriminated against their children. They can make a claim about alleged discrimination regarding:

- Exclusions
- Provision of education and associated services
- Making reasonable adjustments, including the provision of auxiliary aids and services

5.16 Contact details of support services for parents of pupils with SEN

We have a family centred ethos and are experienced in supporting children and their families beyond the school walls. We encourage families to seek advice and support from our SENDCo. In addition, a range of parent support services are available in York including drop in sessions and workshops for parents of children with ASC provided by the Specialist Teaching Team and a short breaks respite care service (<https://www.yor-ok.org.uk/families/Local%20Offer/ShortBreaksInfo>) Further information on support groups for parents can be found on the YorOK website (<https://www.yor-ok.org.uk/families/Local%20Offer/parent-carer-support-2.htm>).

5.18 The local authority local offer

Our local authority's local offer is available here: <https://www.yor-ok.org.uk/families/Local%20Offer/sendlocaloffer>

6. Safeguarding for children with SEND

School staff are mindful that children with SEND may be at greater risk than their peers for reasons including their greater dependence on adults, that they may lack the understanding to know when something is wrong and may lack the communication skills to make a disclosure. The SENDCo has recently accessed NSPCC training on safeguarding children and young people with SEND and shared key information with school staff.

7. Looked After Children and Children Adopted from Care

As a school we are very aware of that this group of children are highly vulnerable learners. We strive to develop attachment friendly practice to mitigate the impact of attachment issues and trauma which is a common feature of the early lives of this group of children.

7.1 Roles

Designated teacher: Jane Hitchon

Deputy designated teacher: James Rourke

The designated teacher for looked after and previously looked after children will take a leadership role in promoting the educational achievement of every looked after and previously looked after child on our school's roll, and ensuring that their personal, emotional and academic needs are prioritised. They will also be the central point of initial contact within the school for the external agencies working with these pupils.

7.2 Duties and Responsibilities

Ethos and culture

- Contribute to the development and review of whole-school policies and procedures so that they do not unintentionally put looked after and previously looked after children at a disadvantage (for example, procedures such as induction and transition)
- Promote a culture in which looked after and previously looked after children are:
 - Prioritised for academic support
 - Encouraged to actively participate in school life
 - Supported to succeed and aspire to further and higher education or highly skilled jobs

- Able to take ownership of their learning and have opportunities to discuss their progress
- Able to discuss difficult issues (such as SEN, bullying, attendance) in a frank manner

Teaching and learning

- Set high expectations of looked after and previously looked after children's learning, and ensure teachers set targets that accelerate progress
- Advise teachers on differentiated teaching strategies appropriate for looked after or previously looked after children
- Advise on the use of assessment for learning approaches to improve the progress of these pupils, and help them and their teachers understand where they are in their learning and their next steps

Looked after children with special educational needs

- Ensure that the SEND code of practice, as it relates to looked after children, is being followed
- Where any looked after child has an EHCP, monitor the pupil's Personal Education Plan (PEP) to ensure it works in harmony with the EHC plan to set out how their needs are being met

Working with staff

- Ensure that they themselves, and other school staff, have strong awareness, training and skills around the specific needs of looked after and previously looked after children and how to support them
- Work with the school's designated safeguarding lead to ensure any safeguarding concerns regarding these pupils are quickly and effectively responded to

Working with carers, parents or guardians

- Promote good home-school links
- Support progress by ensuring effective communication with carers, parents or guardians
- Ensure carers, parents or guardians understand:
 - The potential value of one-to-one tuition and are equipped to engage with it at home
 - How the school teaches skills such as reading and numeracy
- Encourage high aspirations and working with the child to plan for their future success and fulfilment

Working with external agencies

- Build and maintain relationships with other professionals, in particular the virtual school head (VSH) and the local authority's SEND department, to ensure the school responds effectively to its pupils' needs
- Work with relevant professionals, including the VSH, to ensure that they (the designated teacher) and other school staff have the skills to identify signs of potential mental health issues among looked after and previously looked after children, and know how to access further assessment and support where necessary
- Work with relevant professionals, including social workers and school staff, to develop, monitor and review looked after pupils' PEPs

8. Monitoring arrangements

This policy and information report will be reviewed by Jane Hitchon (SENDCo) **every year**. It will also be updated if any changes to the information are made during the year.

It will be approved by the governing board.

9. Links with other policies and documents

This policy links to the following documents:

- Accessibility plan
- Behaviour policy Single Equalities Action Plan
- Anti-bullying policy
- Complaints procedure
- Confidentiality policy
- Equality Plan and Procedure
- Flexi-education Policy
- SEND Report



Approved by FGB

Meeting Date: July 2022