



Tiverton Academy

ICT POLICY

To be reviewed annually –September 2019

Introduction

ICT in the 21st Century is seen as an essential resource to support learning and teaching, as well as playing an important role in the everyday lives of children, young people and adults. Consequently, academies need to build in the use of these technologies in order to equip our young people with the skills to access life-long learning and employment.

Information and Communications Technology covers a wide range of resources including; web-based and mobile learning. It is also important to recognise the constant and fast paced evolution of ICT within our society as a whole. Currently the Internet technologies children and young people are using both inside and outside of the classroom include:

- Websites
- Learning Platforms and Virtual Learning Environments
- Email and Instant Messaging
- Apps for Instant Messaging
- Photo and video sharing Apps
- Chat Rooms, Forums and Social Networking
- Blogs and Wikis
- Podcasting (Audio Sharing)
- Video Sharing
- Music Sharing / Downloading
- Gaming
- Mobile / Smart phones with functionality including: text, video, web, audio, music , global positioning (GPS)
- Other mobile devices with similar functionality (tablets, laptops, gaming devices)

Whilst exciting and beneficial both in and out of the context of education, much ICT, particularly web-based resources, are not consistently policed. All users need to be aware of the range of risks associated with the use of these Internet technologies. Ensuring children and young people are aware of the risks associated with the use of technologies, and can adopt safer behaviours, is vital in safeguarding them against cyber-bullying and grooming.

At Tiverton Academy, we understand the responsibility to educate our pupils on Online Safety issues; teaching them the appropriate behaviours and critical thinking skills to enable them to remain both safe and legal when using the Internet and related technologies, in and beyond the context of the classroom.

Roles and Responsibilities

The Principal and governors have ultimate responsibility to ensure that this policy and its practices become embedded and are monitored. The named Online Safety co-ordinators in our academy are Faria Arshad (Assistant Principal and Debbie Norbury (Vice Principal), who have been designated this role as a member of the senior leadership team. All members of the academy community have been made aware of who holds this post. It is the role of the co-ordinator (Faria Arshad) to keep abreast of current issues and guidance.

Senior Management and Governors are updated by the Principal / co-ordinator and all governors have an understanding of the issues and strategies at our academy in relation to local and national guidelines and advice.

This policy, supported by the academy's acceptable use agreements for staff, governors, visitors and pupils, is to protect the interests and safety of the whole academy community. It is linked to the following mandatory academy policies: child protection, health and safety, home- academy agreements, and behaviour / pupil discipline (including the anti- bullying) policy and particularly to the curricular for PHSE and SRE.

Skills / awareness development for staff

- Our staff receive regular information and training on Online Safety issues in the form of staff meetings.
- New staff receive information on the academy's acceptable use policy as part of their induction.
- All staff have been made aware of their individual responsibilities relating to the safeguarding of children within the context of and know what to do in the event of misuse of technology by any member of the academy community.

Managing the academy Online Safety messages

- We endeavour to embed messages across the curriculum whenever the Internet and / or related technologies are used. This is particularly reinforced in Citizenship, Internet Safety, and SRE lessons in relation to cyber- bullying and to grooming.
- The policy will be introduced to the staff at the start of each academy year.
- Posters will be prominently displayed in each classroom.
- The academy uses Policy Central to monitor the online activity of both its staff and pupils.

ICT in the Curriculum

ICT and online resources are increasingly used across the curriculum. We believe it is essential for guidance to be given to the pupils on a regular and meaningful basis.

- Educating pupils on the dangers of technologies that may be encountered outside academy is done informally when opportunities arise and as part of the curriculum.
- Pupils are taught about copyright and respecting other people's information, images, etc through discussion, modelling and activities.
- Pupils are aware of the impact of online bullying and know how to seek help if they are affected by these issues. Pupils are also aware of where to seek advice or help if they experience problems when using the Internet and related technologies; i.e. parent/ carer, teacher/ trusted staff member, or an organisation such as Childline/ CEOP report abuse button.
- Pupils are taught to critically evaluate materials and learn good searching skills through cross curricular teacher models, discussions and via the Computing curriculum.
- Citizenship and online safety lessons provide the opportunity to discuss issues relating to cyber-bullying and Internet grooming (e.g.: through respect for others and appropriate / positive relationships) These lessons can equip pupils with the knowledge to keep safe from harm.

Password Security

Password security is essential for staff, particularly as they are able to access and use pupil data. Staff are expected to have secure passwords which are not shared with anyone.

- All users read and sign an Acceptable Use Agreement to demonstrate that they have understood the academy policy.
- Users are provided with an individual network and email log-in username.
- If a user thinks their password may have been compromised or someone else has become aware of their password they are expected to report this to Faria Arshad, Debbie Norbury or Carl Davies(network manager.)
- Staff are aware of their individual responsibilities to protect the security and confidentiality of academy networks, MIS systems including ensuring that passwords are "strong" and not shared. Workstations are programmed to automatically lock after 30 seconds of non-use.

Managing the Internet

The Internet is an open communication medium, available to all, at all times. Anyone can view information, send messages, discuss ideas and publish material which makes it both an invaluable resource for education, business and social interaction, as well as a potential risk to young and vulnerable people. In our academy internet use is logged using Policy central enterprise software and the logs are randomly but regularly monitored (by Debbie Norbury). Whenever any inappropriate use is detected it will be followed up.

- In our academy pupils are not allowed unsupervised access to the Internet.
- Staff will preview any recommended sites before use with pupils.

Infrastructure

- Academy Internet access is controlled through Policy Central Enterprise software.
- Tiverton Academy is aware of its responsibility when monitoring staff communication under current legislation and takes into account; Data Protection Act 1998, The Telecommunications (Lawful Business Practice) (Interception of Communications) Regulations 2000, Regulation of Investigatory Powers Act 2000, Human Rights Act 1998.
- Staff and pupils are aware that academy based email and Internet activity can be monitored and explored further if required.
- The academy does not allow pupils access to Internet logs.
- The academy uses management control tools for controlling and monitoring workstations.
- If staff or pupils discover an unsuitable site, the screen must be switched off / closed and the incident reported immediately to the class teacher. This will be passed on to Jack Bertuello or Debbie Norbury.
- Anti-Virus protection is provided by Symantec Antivirus and is set to automatically update on all academy machines. This is the responsibility of Carl Davies, network manager.

Managing other Communication & Networking technologies

The Internet includes a wide range of communication and networking tools & sites. Children need to be educated about appropriate ways of communicating and about the risks of making personal information too easily available. If used responsibly both outside and within an educational context it can provide easy to use, creative, collaborative and free facilities. However it is important to recognise that there are issues regarding the appropriateness of some content, contact, culture and commercialism. To this end, we encourage our pupils to think carefully about the way that information can be added and removed by all users, including themselves, from these sites.

- At present, the academy denies access to social networking sites to pupils and staff within academy.
- All pupils are advised to be cautious about the information given by others on sites, for example users not being who they say they are.

- Pupils are taught to avoid placing images of themselves (or details within images that could give background details) on such sites and to consider the appropriateness of any images they post due to the difficulty of removing an image once online.
- Pupils are always reminded to avoid giving out personal details on such sites which may identify them or where they are (full name, address, mobile/ home phone numbers, academy details, IM/ email address, specific hobbies/ interests).
- Pupils are asked to report any incidents of bullying to the academy.
- Staff understand that it is highly inappropriate to use social networking sites and other personal communication tools to communicate with pupils and / or parents (eg: Facebook, Twitter, email etc).
- Staff understand that it may be considered a disciplinary offence if they mention on social networking sites; issues concerning pupils / parents / carers / other staff associated with the academy.

Mobile Technologies

Many emerging technologies offer new opportunities for teaching and learning including a move towards personalised learning and 1:1 device ownership for children and young people. Many existing mobile technologies (such as portable media players, gaming devices, Smart phones, etc) are familiar to children outside of the academy. Allowing such personal devices to access the academy network can provide immense benefits in collaboration, but also create risks associated with misuse, inappropriate communications, etc.

Emerging technologies will be examined for educational benefit and the risk assessed before such use of personal devices is facilitated in academy. Our academy chooses to manage the use of these devices in the following ways so that users exploit them appropriately.

Personal Mobile devices (including phones)

- The academy allows staff to bring in personal mobile phones and devices for their own use. Under no circumstances does the academy allow a member of staff to contact a pupil or parent/ carer using their personal device. Mobile phones are not allowed in classrooms or in areas where children are during teaching time.
- Staff may not record or take photos of any child using her / his personal device

- The academy is not responsible for the loss, damage or theft of any personal mobile device.
- Permission must be sought before any image, video or sound recordings are made on these devices of any member of the academy community.
- Capturing images & video is not allowed by staff unless on academy equipment and for educational purposes.
- Users bringing personal devices into academy must ensure there is no inappropriate or illegal content on the device.

Managing email

The use of email within most academies is an essential means of communication for staff. In the context of the academy, email should not be considered private.

Educationally, email can offer significant benefits including; direct written contact between academies on different projects, within the academy or international.

- The academy gives all staff an individual e-mail account to use for all academy business. This is to minimise the risk of receiving unsolicited or malicious emails and that of personal profile information being revealed.
- Staff should never use their personal email account(s) for academy business or communication with parents or children

- It is the responsibility of each account holder to keep the password secure. For the safety and security of users and recipients, all mail is filtered and logged; if necessary email histories can be traced. Staff e- mail address should be used for all academy business.
- Email sent to an external organisation should be written carefully before sending, in the same way as a letter written on academy headed paper.
- All email users are expected to adhere to the generally accepted rules of network etiquette (netiquette) particularly in relation to the use of appropriate language and not revealing any personal details about themselves or others in email communication, or arrange to meet anyone without specific permission.
- Staff must inform the Online Safety co-ordinator (**Jack Bertuello or Debbie Norbury**) if they receive an offensive email.

Safe use of Images/ Video taking of images and video

Digital images / video are easy to capture, reproduce and publish and, therefore, easily misused. We must remember that it is not always appropriate to take or store images of any member of the academy community or public, without first seeking consent and considering the appropriateness.

- With the written consent of parents (on behalf of pupils) and staff, the academy permits the appropriate taking of images / video by staff and pupils with academy equipment.
- Staff are not permitted to use personal devices, (eg: mobile phones and cameras), to record images of pupils, this includes when on field trips. However with the express permission of the Principal, images can be taken provided they are transferred immediately and solely to the academy's network and deleted from the staff device.

Parents must seek permission to take photos / video academy events, and must agree to NOT post images / video on the Internet.

Publishing pupil's images and work

On a child's entry to the academy, all parents/guardians will be asked to give permission to use their child's work/photos/ video in the following ways:

- on the academy web site
- in the academy prospectus and other printed publications that the academy may produce for promotional purposes
- recorded/ transmitted on a video or webcam
- in display material that may be used in the academy's communal areas
- in display material that may be used in external areas, ie exhibition promoting the academy
- general media appearances, eg local/ national media/ press releases sent to the press highlighting an activity (sent using traditional methods or electronically)

This consent form is considered valid for the entire period that the child attends this academy unless there is a change in the child's circumstances where consent could be an issue, eg: divorce of parents, custody issues, etc. Parents/ carers may

withdraw permission, in writing, at any time. Consent has to be given by both parents in order for it to be deemed valid.

- Pupils' names will not be published alongside their image and vice versa. Pupils' full names will not be published.
- Before posting student work on the Internet, a check needs to be made to ensure that permission has been given for work to be displayed.

Storage of Images / Video

- Images/ video of children are stored on the academy's network.
- Images/video of children are **not** stored on personal hardware (eg memory sticks, hard drives)
- Rights of access to this material are restricted to the teaching staff within the confines of the academy network

CCTV

- CCTV is used in the following areas: inside and outside.
- The academy uses CCTV for security and safety. The only people with access to this are the Site Manager (**Adrian Green**) **Debbie Norbury (Head of School)** and **Lisa Matthews (Executive Head)**. Notification of CCTV use is displayed at the front of the academy.

Misuse and Infringements

Complaints

Complaints relating to Online Safety should be made to the Online Safety co-ordinator (**Jack B**) and the Designated Safety Person (**Debbie Norbury**). Incidents should be logged and process should be followed.

Inappropriate material

- All users are aware of the procedures for reporting accidental access to inappropriate materials. The breach must be immediately reported to the Online Safety co-ordinator (**Debbie Norbury**) and the Network Manager (**Carl Davies**).
- Deliberate access to inappropriate materials by any user will lead to the incident being logged by the Online Safety co-ordinator (**Debbie Norbury**) and the Network Manager (**Carl Davies**), and depending on the seriousness of the offence may lead to:

- Reporting to the Designated Safety Person (**Debbie Norbury**)
- Investigation by the Principal / LA
- Immediate suspension
- Dismissal
- Involvement of police

Equal Opportunities

Pupils with additional needs

The academy endeavours work in partnership with parents to convey a consistent message to all pupils. This in turn should aid the establishment and future development of the academy's rules.

Staff are aware that some pupils will require additional reminders, prompts and further explanation to reinforce their existing knowledge and understanding of Online Safety issues.

Where a pupil has poor social understanding, careful consideration is given to group interactions when raising awareness of Online Safety. Activities are planned to make use of best available resources and are carefully managed for these children and young people.

Parental Involvement

- We believe that it is essential for parents/ carers to be fully involved with promoting Online Safety both in and outside of academy while appreciating the benefits provided by technologies generally.
- We regularly consult and discuss with parents/ carers and seek to promote a wide understanding about the link between technology and safeguarding.
- Parents/ carers are required to make a decision as to whether they consent to images of their child being taken/ used in the public domain (e.g., on academy website)

Radicalisation

Tiverton Academy is committed to providing a secure environment for pupils, where learners feel safe and are kept safe. All adults at Tiverton recognise that safeguarding is everyone's responsibility irrespective of the role they undertake or whether their role has direct contact or responsibility for learners or not.

'Safeguarding vulnerable people from radicalisation is no different from safeguarding them from other forms of harm' (Home Office, Prevent Strategy – June 2015)

In adhering to this policy, and the procedures therein, staff and visitors will contribute to Tiverton's delivery of the outcomes to all learners, as set out in s10 (2) of the Children's Act 2004. This Policy is one element within our overall arrangements to safeguard and promote the welfare of all learners in line with our statutory duties set out at s175 of the Education Act 2002.

This policy also draws upon the guidance contained in the DfE publication "Keeping Learners safe in Education, 2014", and specifically DCSF Resources "Learning Together to be Safe, "Prevent: Resources Guide", "Tackling Extremism in the UK", DfE's "Teaching Approaches that help build resilience to Extremism among Young People", Peter Clarke's Report (July 2014), "Keeping Children Safe in Education" (March 2015), the "Counter-Terrorism and Security Act" (2015) and the "Prevent Duty" (June 2015).

We recognise that the governing body has a responsibility to pay 'due regard to the need to prevent people being drawn into terrorism' (Counter Terrorism and Security Act, 2015) and ensure the school has a 'clear approach to implementing the Prevent duty and keeping children and learners safe from the dangers of radicalisation and extremism'.

Objectives

This policy is intended to provide a framework for dealing with issues relating to vulnerability, radicalisation and exposure to extreme views. There are different forms

of extremist organisations in the UK and the world, ie – ISIL (Islamic State), Al-Qaeda, Boko Haram,

We recognise that we are well placed to be able to identify safeguarding issues linked to the dangers of extremist views and this policy clearly sets out how the school will deal with such incidents and identifies how the curriculum and ethos underpins our actions.

The objectives are that:

- All governors, teachers, teaching assistants and non-teaching staff will have an understanding of what radicalisation and extremism are and why we need to be vigilant in school.
- All governors, teachers, teaching assistants and non-teaching staff will know what the school policy is on tackling extremism and radicalisation and will follow the policy guidance swiftly when issues arise.
- All members of staff are able to identify children who may be vulnerable to radicalisation and respond by following whole school safeguarding procedures with immediate effect.
- All pupils will understand the dangers of radicalisation and exposure to extremist views; learning about key British values to build resilience against these views and knowing what to do if they experience them.
- All parents/carers and pupils will know that the school has policies in place to keep pupils safe from harm and that the school regularly reviews its systems to ensure they are appropriate and effective.

Definitions

When operating this policy Tiverton Academy uses the following accepted Governmental definition of radicalisation and extremism which is:

Radicalisation – *'the process by which a person comes to support terrorism and forms of extremism leading to terrorism'* (Prevent Strategy)

Extremism – *'vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect tolerance of different faith and beliefs; and/or calls for the death of members in our armed forces, whether in this country or overseas'* (Prevent)

Ethos and Practice

There is no place for extremist views of any kind in our school, whether from internal sources – pupils, staff or governors, or external sources – school community, external agencies or individuals. Our pupils see our school as a safe place where they can explore controversial issues safely and where our teachers encourage and facilitate this – we have a duty to ensure this happens.

As a school we recognise that extremism and exposure to extremist materials and influences can lead to poor outcomes for pupils and so should be addressed as a safeguarding concern as set out in this policy. We also recognise that if we fail to challenge extremist views we are failing to protect our pupils.

Extremists of all persuasions aim to develop destructive relationships between different communities by promoting division, fear and mistrust of others based on ignorance or prejudice and thereby limiting the life chances of young people.

Education is a powerful weapon against this; equipping young people with the knowledge, skills and critical thinking to challenge and debate in an informed way. Therefore at Tiverton we will provide a broad and balanced curriculum so that our pupils are enriched, understand and become tolerant of difference and diversity and also to ensure that they thrive, feel valued and not marginalised.

Furthermore at Tiverton we are aware that young people can be exposed to extremist influences or prejudiced views from an early age which emanate from a variety of sources and media, including via the internet and at times pupils may themselves reflect or display views that may be discriminatory, prejudiced or extremist, including using derogatory language.

There is no single way of identifying a pupil who is likely to be susceptible to terrorist ideology. As part of wider safeguarding responsibilities staff will be alert to:

- Disclosures by pupils of their exposure to the extremist actions, views or materials of others outside of school such as in their homes or community groups, especially where pupils have not actively sought these out.
- Graffiti symbols, writing or art work promoting extremist messages or images
- Pupils accessing extremist material online, including through social networking sites
- Distributing extremist literature and documentation
- Parental reports of changes in behaviour, friendship or actions and requests for assistance
- Partner schools, local authority services and police reports of issues affecting pupils in other schools or settings
- Pupils voicing opinions drawn from extremist ideologies and narratives
- Changes in behaviour which could indicate that they are in need of help or protection
- Use of extremist or 'hate' terms to exclude others or incite violence
- Intolerance of difference, whether secular or religious or, in line within our equalities policy, views based on, but not exclusive to, gender, disability, homophobia, race, colour or culture
- Attempts to impose extremist views or practices on others
- Anti-Western or Anti-British views
- Use of extremist language.

In conclusion we will closely follow any locally agreed procedure as set out by the Local Authority and criteria for safeguarding individuals vulnerable to extremism and radicalisation.

Therefore this approach will be embedded within the ethos of our school so that pupils know and understand what safe and acceptable behaviour is in the context of extremism and radicalisation. This will work in conjunction with our schools approach to the spiritual, moral, social and cultural development of pupils. Our goal is to build mutual respect and understanding and to promote the use of conflict resolution. We will also work with local partners, families and communities in our effort to ensure our school understands and embraces our local context and values in challenging extremist views and to assist in the broadening of our pupils' experiences and horizons. We will help support pupils who may be vulnerable to such influences as part of our wider safeguarding responsibilities. Additionally our school will seek external support from the Local Authority and/or local partnership structures working to prevent extremism.

Curriculum

At Tiverton Academy we will promote the values of democracy, the rule of law, individual liberty, mutual respect and tolerance for those with different faiths and beliefs. We will teach and encourage pupils to respect one another and their differences. It is indeed our most fundamental responsibility to keep our pupils safe and prepare them for life in modern multi-cultural Britain and globally. British values

permeate throughout the school curriculum and support the development of the whole child.

Our curriculum and ethos reflects the government's definition of "**British Values**" in its "Prevent Strategy":

The use of ICT

We strongly recognize the risk posed to our students of on-line radicalization, as terrorist organizations like ISIL seek to radicalize young people through the use of social media and the internet. Research shows that ISIL propaganda includes images and videos that present the group as an exciting alternative to life in the West and that it uses its social media to encourage supporters to share the material with a wider online audience. ISIL promotes an image of success online in order to attract young people. The propaganda claims it is the duty of Muslim men and women in the West to join the fight against the West. The seriousness of the potential online threat is highlighted by the fact that 95,000 pieces of terrorist content has been removed from the internet since 2010.

To combat this online threat we use Policy Central system to filter and monitor student online behaviour on a daily basis. The Headteacher and DSL are notified of any inappropriate behaviour and appropriate steps are taken as required. This may involve speaking to the student, contacting parents, setting up a mentoring programme or making a direct referral to the CTU / MASH team based on the seriousness of the incident. Our annual staff training ensures all staff are fully aware of the risks posed by the online activity of extremist and terrorist groups.

E-safety is a key aspect of the school curriculum and equips pupils to stay safe online, both in school and outside. E-safety is delivered predominantly in the ICT curriculum with specific focus on the range of social media sites that could pose a threat to students.

Safeguarding

Please refer to our Safeguarding Policy for the full procedural framework on our Safeguarding duties. The school follows the guidance outlined by the Birmingham Safeguarding Board.

Although serious incidents involving radicalisation have not occurred at Tiverton Academy to date, it is important for us to be constantly vigilant and remain fully informed about the issues which affect the local area, city and society in which we teach. Staff are reminded to suspend any 'professional disbelief' that instances of radicalisation 'could not happen here' and to be 'professionally inquisitive' where concerns arise, referring any concerns through the appropriate channels.

All adults working at Tiverton Academy including visiting staff, volunteers' contractors, and students on placement) are required to report instances where they believe a young person may be at risk of harm, linked to radicalisation, to the Designated Safeguarding Lead (Lisa Matthews) The DSL will follow up these concerns by contacting the MASH team or the Counter Terrorist

Engagement with Parents / Carers

We will engage with parents / carers as part of our work as we recognise the important role they have in helping us to spot signs of radicalisation. If a safeguarding concern is referred by another student or a member of staff, the DSL

will contact the parents / carers immediately to invite them into school to discuss the concerns. This will, however, depend on the nature and seriousness of the referral. However, if we feel that it is not in the child's best interest to notify their parents / carers of our concerns, we will refer directly to the CTU / MASH team without informing parents / carers. We will make contact directly with CTU / MASH if we have concerns about the threat of radicalisation posed by other family members and seek advice from the MASH to see if any other family members are known to the PREVENT team.

Training

Whole school in-service training on Safeguarding will be organised for staff and governors on an annual basis and will comply with the prevailing arrangements agreed by the Local Authority. The annual staff training now provides specific guidance on extremism and radicalisation and its safeguarding implications. The Designated Safeguarding Lead will attend PREVENT training courses as necessary and the appropriate inter-agency safeguarding training organised by the Local Authority at least every two years.

Recruitment (read in conjunction with recruitment policy)

The arrangements for recruiting all staff, permanent and volunteers, to our school will follow national guidance for safer recruitment best practice in education settings, including, but not limited to, ensuring that DBS checks are always made at the appropriate level (ie – links with extremism), that references are always received and checks and that we complete and maintain a single central record of such vetting checks. We will apply safer recruitment best practice principles and sound employment practice in general in doing so will deny opportunities for inappropriate recruitment or advancement.

Role of Governing Body

The Governing Body of our school will undertake appropriate training to ensure that they are clear about their role and the parameters of their responsibilities as Governors, including their statutory safeguarding duties. This training is delivered by School and Governors Support services.

The Governing Body of our school will support the ethos and values of our school and will support the school in tackling extremism and radicalisation. In line with Recommendation 13 of Peter Clarke's report details of our Governing Body will be published on our school website to promote transparency.

In line with the provisions set out in the DfE guidance 'Keeping Children Safe in Education, 2014' the governing body will challenge the school's senior management team on the delivery of this policy and monitor its effectiveness.

Governors will review this policy annually and may amend and adopt it outside of this timeframe in accordance with any new legislation or guidance or in response to any quality assurance recommendations pertaining to the delivery of this policy and the overall safeguarding arrangements made.

Policy, Adoption, Monitoring and Review

This policy was considered and adopted by the Governing body in line with their overall duty to safeguard and promote the welfare of pupils as set out in the DfE guidance 'Keeping Children Safe in Education' (March 2015), the "Counter-Terrorism and Security Act" (2015) and the "Prevent Duty" guidance (June 2015)

Parents will be issued with a hard copy of this policy on request.

In Tiverton Academy the Designated Safeguarding Lead will actively evaluate the effectiveness of this policy by monitoring the staff group's understanding and application of the procedures within this policy as their overall duty to safeguard pupils. The policy, in line with updated DfE and Local Authority guidance, will be reviewed on an annual basis.

To be reviewed: September 2018