



SEND Policy

Policy Reviewed: January 2025
Approved by Governors: 30.1.25
Next Review: January 2026
Signed by Chair: *A Green*

This policy sets out the procedures for Special Educational Needs and Disabilities (SEND) at St Mary's CE Primary School and is to be reviewed annually.

To see how it looks in practice, please see the SEND information Report (Local Offer)
<https://www.stmaryscecrompton.oldham.sch.uk/wp-content/uploads/2021/09/SEND-Information-Report.pdf>

Vision

"Love one another as Jesus loved us." (John 13: 34-35)

Through God's love and our Christian Values we encourage each individual to love, respect and value themselves and others. We encourage and nurture the growth of every individual and their uniqueness so that all flourish and become all that they can be and all that God made them to be.

Healthy School

St. Mary's is a Healthy School with healthy attitudes embedded in the curriculum and extra-curricular activities. Children are encouraged to be active and maintain healthy relationships with their peers and adults as well as making other choices about healthy lifestyles.

Building Learning Power Statement

At St. Mary's, we encourage all pupils to build their own learning power. Building Learning Power emphasises the development of lifelong learning values and skills. We aim to ensure that all children develop persistence and curiosity for learning and become adventurous risk takers who are not afraid of the 'don't know' state of mind. At St. Mary's, children will develop the ability to take responsibility for their own learning and self-assess and be able to articulate themselves as a learner. They will have the opportunity to develop the ability to know what's worth learning, know how to face confusion and know the best learning tool for the job.

Compliance

This policy complies with the statutory requirements laid out in the 'Special educational needs and disability code of practice 0 - 25 years' (January 2015).

It has been written with reference to the following guidance and documents:

- Special educational needs and disability code of practice: 0 - 25 (January 2015)
- Children and families act (2014)
- Statutory guidance on supporting pupils at school with medical conditions (April 2015)
- Equality act 2010: advice for schools (February 2013)
- Teachers standards (2012, as updated)
- Schools SEN Information Report Regulations (2014)
- The National Curriculum in England Key Stage 1 and 2 framework document (September 2013, as updated)
- The Early Years Foundation Stage (EYFS) framework

This SEND policy should be used alongside and in conjunction with our policies on:

- Accessibility Plan
- Admissions Policy
- Safeguarding Policy
- Single Equality Policy (including Accessibility Plan)

- Behaviour Policy
- Anti Bullying Policy
- Medical Conditions Policy
- GDPR Policy
- SEND Information Report (Local Offer)
- Oldham LA's Local Offer ([www.oldham.gov.uk>info>your local offer](http://www.oldham.gov.uk/info/your-local-offer))
- Emotional and Mental Wellbeing Policy

In addition, this policy should also be used alongside and in conjunction with Oldham LA's local offer. https://www.oldham.gov.uk/info/200368/children_and_young_people_with_special_educational_needs_and_disabilities

School SEND Information	
SENDCo Lead	Mrs S Hepworth Contact Number : 0161 770 8309 info@stmarysccecrompton.oldham.sch.uk
SENDCo Governor	Mrs G Croston Contact via the school office Contact Number : 0161 770 8309 info@stmarysccecrompton.oldham.sch.uk

Values and Beliefs

At St Mary's, we believe that all children are entitled to an education that consists of a broad and balanced curriculum which is appropriate to their needs, promotes high standards and the fulfilment of their potential. This should enable them to achieve the best possible educational and other outcomes and become confident young people with a growing ability to communicate their own views.

All teachers teach children with SEND and every teacher is responsible for the progress of all children in their class, even where children access support from teaching assistants, mentors and specialist staff. Staff will seek to identify differing needs and respond with appropriate teaching strategies in an adapted curriculum through high quality teaching.

We recognise that some children will need provision that is additional to and different from that which is provided for the majority of their peers - this is special educational provision. At St Mary's we will use our best endeavours to ensure that such special educational provision is made for those children who need it.

Our policy for SEND is based on the principles that underpin the SEND code of practice (2015):

1. A child with SEND will have their needs met.
2. The views, wishes and feelings of a child with SEND should be sought and taken into account as fully as possible and as appropriate to their age and understanding.
3. Parents/carers have an important role to play in supporting their child's education. Their views should be sought and taken into account.
4. Collaborative working should take place between all who are involved in securing the best outcomes for a child - including education, health and social care services.

Aims

- ✓ To ensure that all children have access to a broad and balanced curriculum as appropriate to their needs.
- ✓ To ensure that all children have the opportunity to reach their full potential.
- ✓ To provide for the development of the whole child.
- ✓ To promote children's self-esteem and ensure that individual contributions are valued.
- ✓ To provide a happy, caring, safe and supportive environment, which is inclusive of the needs of all children.

Objectives

- ✓ To provide all children with high quality teaching within a broad and balanced curriculum.
- ✓ To ensure the early identification of pupils with SEND.
- ✓ To ensure that provision is made for children with SEND so that they can make progress.
- ✓ To assess and monitor the effectiveness of SEND provision.
- ✓ To provide support and advice for staff working with children with SEND.
- ✓ To involve parents/carers in discussions about their child's progress.
- ✓ To work in partnership with outside agencies, to ensure the best possible provision for children with SEND, where necessary.
- ✓ To consider the views of the child.
- ✓ To work within the guidance provided in the SEND Code of Practice (January 2015).
- ✓ To liaise effectively with all those working with the child in the future to ensure that transitions are successful.

Definition of SEND: (p15 - 16 SEND Code of Practice 2015)

- A child or young person has SEN if they have a learning difficulty or disability which calls for special educational provision to be made for him or her.
- A child of compulsory school age or a young person has a learning difficulty or disability if he or she has a significantly greater difficulty in learning than the majority of others of the same age, 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 or mainstream post-16 institutions.

Under the SEND Code of Practice (2015) there are 4 areas of need :

Communication and interaction

Children and young people with speech, language and communication needs (SLCN) have difficulty in communicating with others. This may be because they have difficulty saying what they want to, understanding what is being said to them or they do not understand or use social rules of communication. The profile for every child with SLCN is different and their needs may change over time. They may have difficulty with one, some or all of the different aspects of speech, language or social communication at different times of their lives.

Children and young people with Autistic Spectrum Disorder (ASD), including Asperger's Syndrome and Autism, are likely to have particular difficulties with social interaction. They may also experience difficulties with language, communication and imagination, which can impact on how they relate to others.

Cognition and learning

Support for learning difficulties may be required when children and young people learn at a slower pace than their peers, even with appropriate differentiation. Learning difficulties cover a wide range of needs, including moderate learning difficulties (MLD), severe learning difficulties (SLD), where children

are likely to need support in all areas of the curriculum and associated difficulties with mobility and communication, through to profound and multiple learning difficulties (PMLD), where children are likely to have severe and complex learning difficulties as well as a physical disability or sensory impairment.

Specific learning difficulties (SpLD), affect one or more specific aspects of learning. This encompasses a range of conditions such as dyslexia, dyscalculia and dyspraxia.

Social, emotional and mental health

Children and young people may experience a wide range of social and emotional difficulties which manifest themselves in many ways. These may include becoming withdrawn or isolated, as well as displaying challenging, disruptive or disturbing behaviour. These behaviours may reflect underlying mental health difficulties such as anxiety or depression, self-harming, substance misuse, eating disorders or physical symptoms that are medically unexplained. Other children and young people may have disorders such as attention deficit disorder, attention deficit hyperactive disorder or attachment disorder. However, it is important to note that not all behaviour issues are linked to social, emotional and mental health and may reflect other underlying difficulties.

Sensory and/or physical impairment

Some children and young people require special educational provision because they have a disability which prevents or hinders them from making use of the educational facilities generally provided. These difficulties can be age related and may fluctuate over time.

Many children and young people with vision impairment (VI), hearing impairment (HI) or a multi-sensory impairment (MSI) will require specialist support and/or equipment to access their learning, or habilitation support. Children and young people with an MSI have a combination of vision and hearing difficulties.

Some children and young people with a physical disability (PD) require additional ongoing support and equipment to access all the opportunities available to their peers.

Children and young people with some health or disability conditions do not necessarily have SEND, but there is a significant overlap between disabled children and young people and those with SEND. Where a disabled child or young person requires special educational provision they will also be covered by the SEND definition (p16 Code of Practice 2015)

Identifying and assessing SEND for children or young people whose first language is not English requires particular care. Schools should establish whether lack of progress is due to limitations in their command of English or if it arises from SEN or a disability. Difficulties related solely to limitations in English as an additional language are not SEND. (Code of Practice 6.24)

Identification of Pupils with SEND

We recognise the benefits of identifying children with SEND at the earliest point and then making effective provision for them to improve their long term outcomes.

Children with SEND can be identified in a number of ways:

- Through class teacher's assessments in consultation with the SENDCo.

- Discussion with the child's parents in consultation with the SENDCo.
- Information from external sources, e.g. pre-school SEND services or previous school information.
- Concerns raised by the child themselves.

A Graduated Response to SEND Support

All teachers teach children with special educational needs and are responsible and accountable for the progress and development of all children in their class, including where children access support from teaching assistants or specialist staff. At the heart of the learning of every class will be a continuous cycle of planning, teaching and assessment that will take into account the wide range of abilities, aptitudes and interests of children. High quality teaching, which is differentiated and personalised, will be provided for all pupils. The majority of pupils will learn and progress within these arrangements, but those children whose overall attainment or attainment in specific subjects fall significantly outside the expected range may have special educational needs.

Early identification is vital and the school uses a graduated response to identify a child's special educational needs as outlined in the Code of Practice.

Stage 1: Initial Concerns

Where children continue to make inadequate progress despite high quality teaching and appropriate support, the class teacher will work with the school's SENDCo to begin to assess the child's need. Staff will refer to guidance in Oldham Graduated Response Toolkit www.oldham.gov.uk/grt

When considering if a child has SEN any of the following may be evident:

- Making no or little progress despite high quality teaching and targeted support in the child's area of need.
- Having a significantly greater difficulty in learning than the majority of children of the same age.
- Persistent social, emotional and behaviour difficulties which are not alleviated using appropriate behaviour management strategies and which substantially and regularly interfere with the child's own learning or that of their class.
- Have a disability or health need that prevents or hinders them from making use of educational facilities of a kind generally provided for children of the same age.
- Have a disability or health need that requires additional specialist equipment or regular advice or visits by a specialist service.

Stage 2: Monitoring (Cause for Concern)

The class teacher makes an initial identification and discusses concerns with the SENDCo. The Class Teacher will arrange to speak to the child's parents at the earliest opportunity to share concerns and gather both pupil and parental views. A 'Cause for Concern' form is completed by the class teacher and stored in the pupil's file.

Pupils at this stage are placed on the School's Monitoring register by the SENDCo.

Any interventions, either as a small group or as an individual will be recorded and monitored following the assess, plan, do, review cycle. This will include any history of interventions- including records of baseline and impact of interventions used.

All pupils requiring adjustments to be made by the class teacher to ensure inclusion in the day to day setting, will be identified on the class provision maps.

Stage 3: SEND Support (without external agencies)

If a child's progress continues to be a concern and is not adequate and there is a lack of progress despite having additional high quality teaching and interventions, they will be categorised as SEN support and placed on the 'Special Needs' register. The decision to place a child on the Special Needs list is not taken lightly. Parents are required to sign a consent form for their child to be placed on SEND Support. Prior to being placed on the Special Needs list, the teacher will have, over time, regularly assessed the child, planned appropriately (including adaptations, group interventions, individual interventions, adapted resources), implemented the plan and reviewed its effectiveness. The cycle of assess, plan, do and review will continue to be recorded in a SEN Support Plan. This information will continue to be shared with parents/carers at least termly through parents' evenings. It is likely that the SENDCo and/or teacher may arrange to meet with parents/carers outside of parents' evenings. A person centred review may be organised by the SENDCo to which all professionals working with the child, their parents/carers and the child themselves (where appropriate) will be invited to attend.

Stage 4: SEND Support (with external agencies)

Where a child continues to make less than expected progress and/or continues to work at levels substantially below those expected of pupils at a similar age despite evidence - based support / targeted interventions that are matched to a child's area of need, it will be necessary to seek assessment by and/or advice from an external professional or specialist teachers.

Examples of external and specialist services include, but are not limited to:

- Advisory teachers within Oldham's Quality Effectiveness, Support and Training Team (QEST) Team
- The Educational and Child Psychology Service
- Child and Adolescent Mental Health Service (CAMHS)
- Community Paediatrics
- Sensory and Physical Support Services (SAPSS)
- Occupational Therapy
- Speech and Language Therapy
- Early Help

Some of these external agencies require a separate consent form to be signed by the child's parent / carer. The SENDCo will advise parents when this is needed. The advice provided by these services will be shared with all adults coming into active learning situations with the child. This will be used to inform the child's targets and provision as evidence in their SEN Support Plan which will be reviewed frequently.

A person centred review may be organised by the SENDCo and all professionals working with the child, their parents/carers and the child themselves (where appropriate) will be invited to attend.

Stage 5: School Request for an Education, Health and Care Plan (EHCP)

An EHCP is a legal document which describes a child or young person's (aged up to 25 years old) special educational needs, the support they need, and the outcomes they would like to achieve.

A child will be considered for statutory assessment if:

- despite the school having taken relevant and purposeful action to identify and meet the needs of a child they still have not made adequate progress;
- despite acting on advice of outside agencies and working on specific targets, following the plan, do and review cycle the pupil still does not make adequate progress;
- the pupil's needs are severe and/or complex.

Where a request for a statutory assessment is made by the school to the LA, the child will have demonstrated a significant cause for concern. The LA will request information about the child's progress over time and will also need documentation in relation to the child's special educational needs and any action taken to deal with those needs, including resources and/or special arrangements put in place.

This information will include:

- Pupil Centered Review information and action plans for the pupil
- Evidence of at least 3 cycles of assess, plan do and review
- Details of interventions (including baseline information)
- The pupil's health background including the child's medical history where relevant
- Evidence of the child's attainment levels - current and over time
- Evidence of progress over time
- Educational and other assessments - advice from an external agency must be present
- Views of the parents of the child
- Views of the child
- Involvement of other professionals such as health, social services or education welfare service.

See also LA EHCP handbook Dec'16, link below:

http://www.oldham.gov.uk/downloads/file/4358/the_ehcp_schools_handbook_v5

Parents may also consider starting the process to request an Education, Health Care Plan.

Statutory assessment involves consideration by the LA, working cooperatively with parents, the school and other agencies, as to whether a statutory assessment of the child's special educational needs is necessary.

Stage 6: Education, Health Care Plan

If an EHCP assessment is accepted by the LA and it is agreed to produce a draft plan, an Education, Health and Care Plan (EHCP) will include:

- The pupil's name, address and date of birth;
- Details of all of the pupils special needs and abilities;
- The special educational provision necessary to meet the pupil's needs;
- The type and name of the school where the provision is to be made;
- Relevant non-educational needs of the child;

All children with EHC Plans will have short-term targets set for them in an action plan and school related actions will be implemented, where possible, in the normal classroom setting. The delivery of the interventions will be the responsibility of the class teacher.

All EHC Plans must be reviewed annually with parents, the pupil, the LA, the school and professionals to consider whether any amendments need to be made to the description of the pupil's needs.

Criteria for exiting SEND register

If a child with SEND makes sufficient progress in their area of need, so that they no longer require any provision that is different from or additional to what is normally available to a child of their age through high quality teaching, they will no longer be seen as requiring SEND support and will be removed from the SEND register.

Supporting pupils and families

Oldham LA's Local Offer is an online resource that details services, support and guidance available to children and young people with SEND ages between 0 - 25 and their families. The link to the LA Local Offer can be found on the school websites and is available here:

https://www.oldham.gov.uk/info/200368/children_and_young_people_with_special_educational_needs_and_disabilities

On our school website a SEN information report (Local Offer)

<https://www.stmaryscecrompton.oldham.sch.uk/wp-content/uploads/2021/09/SEND-Information-Report.pdf>

In addition there are outside agencies such as 'POINT', who can provide additional support to parents/carers of children with SEND. Further information can be found here at <https://www.point-send.co.uk/>

Admissions

St Mary's is an inclusive school. We have high expectations for all our children whatever their ability or needs. We aim to achieve this through the removal of barriers to learning and participation. We want all our children to feel that they are a valued part of our Christian school community.

Through our ethos and curricular provision, we respect and acknowledge that children:

- have different educational and behavioural needs and aspirations;
- require different strategies for learning;
- acquire, assimilate and communicate information at different rates;
- need a range of different teaching approaches and experiences.

St Mary's admissions criteria details can be found on the school website or by following this link:

<https://www.stmaryscecrompton.oldham.sch.uk/admissions/>

Supporting Children at School with Medical Conditions

At St Mary's, we recognise that children with medical conditions should be properly supported to have access to education, including school trips and physical education. Teachers will ensure that appropriate provision is made for the child.

St Mary's School has policies on medical procedures and on asthma, which can be accessed through the school website or via the school office. Where children have a significant medical and healthcare need requiring additional provision, they will have a Health Care Plan, which details the child's medical condition and the provision that needs to be made for them.

Some children with medical needs as well as SEND may have an EHCP, which brings together their health needs and special provision.

Monitoring and Evaluating

At St Mary's, we regularly and carefully monitor and evaluate the quality of the provision we offer for all pupils.

The SENDCo completes regular monitoring to track the SEND pupils to ensure progress is being made.

Examples of monitoring completed includes:

- Termly review meetings
- Provision Map monitoring (termly)
- TA Observations and quality of interventions (at least annually)
- Outcomes of Pupil Progress (termly)
- Staff views
- Pupil views
- Parent views
- SEND Governor views

The evaluation and monitoring arrangements promote an active process of continual review and improvement of provision for all pupils.

Transition Arrangements:

Children transferring to St Mary's CE Primary School:

When children with SEND are admitted into school or transfer from another school, every effort is made to ensure the relevant information is received as quickly as possible. Sometimes children join us who were not on the SEND Register at their previous school. In these cases, we monitor their progress closely before inviting their parents into school to discuss next steps.

Children joining us in Reception:

Children entering our Reception class will have the opportunity to visit school in the summer term.

The SENDCo and / or Reception class teacher attend pre-school review meetings in the summer term before children join our Reception class so that necessary measures can be put in place. If necessary, we also liaise with relevant outside agencies before they start e.g. Health Visitors / Early Years Team.

Children transferring to another school:

For children moving on to a new school, individual SEND information will be passed on to the receiving school.

Transition to secondary school:

When Year 6 children transfer to secondary school, a review meeting will be set up in the summer term to discuss transition arrangements. The child's parents, class teacher, secondary school Transition Officer and if necessary, relevant outside agencies are invited.

Training and Resources:

In order to maintain and develop the quality of teaching and provision to respond to the strengths and needs of all pupils, staff are encouraged to undertake relevant training and development.

The training needs of staff are identified and planned through the process of observations and through the needs of the children in their class. All staff attend regular staff meetings where issues and training about high quality teaching can be addressed.

The SENDCo regularly attends local authority SENDCo Development Days, in order to keep up to date with local and national initiatives in SEND. The SENDCo also meets with other SENDCo's in the local area as part of a collaborative network.

Roles & Responsibilities

Provision for children with SEND is a whole school matter. In addition to the governing body, the head teacher and the SENDCo, this policy applies to all members of staff: both teaching and support staff in their day-to-day responsibilities.

SEND Governor

The named Governor for SEND (Gemma Croston - contact details available from the school office) will ensure:

- the necessary provision is made for any pupil who has SEND
- all staff in school are aware of the importance of identifying and providing for those children with SEND
- pupils with SEND have the opportunity to participate in school activities, together with those pupils who do not, as far as is reasonably practical and compatible with the needs of all the children
- they have regard to the Code of Practice (2015) when carrying out duties towards all pupils with SEND and meet with the SENDCo on a yearly basis
- parents are notified if the school decides to make SEND provision for their child
- school provides an information report for parents on the school website
- they raise awareness of SEND issues at Governing Board meetings

The Headteacher

The Headteacher (Pamela Hartley) will:

- Work with the SENDCo and the SEND Governor to determine the strategic development of the SEND policy and provision in the school
- Make final decisions on the deployment of the school's delegated budget and other resources to meet pupils' needs effectively
- Have overall responsibility for the provision and progress of learners with SEND
- Be responsible for the management of all aspects of the school's work, including provision for pupils with Special Educational Needs
- Keep the governing body informed about SEND issues
- Working closely with the SENDCo
- Monitor and report to governors about the implementation of the schools' SEND policy and the effects of inclusion policies on the school as a whole

The SENDCo

The SENDCo (Susanna Hepworth) is responsible for:

- Working with the Headteacher and SEND Governor to determine the strategic development of the SEND policy and provision in the school. (SEND Files, Impact and quality of interventions, progress of SEND pupils)
- Having day-to-day responsibility for the operation of this SEND policy and the coordination of specific provision made to support individual pupils with SEND, including those with EHC Plans
- Providing professional guidance to colleagues and work with staff, parents and other agencies to ensure that pupils/young people with SEND receive appropriate support and high quality teaching
- Advising on the graduated approach to providing SEND support

- Evaluate process and practice to improve outcomes
- Being the point of contact for external agencies
- Liaising with potential next providers of education to ensure pupils/young people and their parents are informed about options and a smooth transition is planned
- Assisting in the monitoring and evaluation of progress of pupils with SEND through the use of existing school assessment information, e.g. class-based assessments/records, end of year tests, SATs, etc.
- Maintain the Monitoring register and SEND Register
- Ensuring the school keeps the records of all pupils with SEND up to date
- Liaising closely with parents of pupils with SEND alongside class teachers
- Overseeing the records of all children with special educational needs
- Liaising closely with parents of pupils with SEND alongside class teachers, so that they are aware of the strategies that are being used and are involved as partners in the process
- Managing the school-based assessment and completing the documentation required by outside agencies and the LA
- Managing a range of resources, human and material, to enable appropriate provision for children with special educational needs
- Working with the Headteacher and the Governing Board to ensure that the school meets its responsibilities under the Equality Act 2010 with regard to reasonable adjustments and access arrangements
- Attending relevant meetings and training to further develop the role of SENDCo
- Contributing to the in-service training of staff
- Update the SEND Policy and School Local offer on an annual basis
- Present a SEND report to Governors annually

Class Teachers

Class Teachers are responsible for:

- The progress and development of every pupil in their class through high quality teaching
- Identifying children with SEND in their care and bringing them to the attention of the SENDCo
- Adapting the curriculum to meet the needs of individuals and groups of children
- Working with the SENDCo to review each pupil's progress and development and decide any changes to provision
- Ensuring all documentation is up to date and evaluated
- Updating provision maps/timetables termly
- Planning work for the TAs working with a child(ren) in their class, including liaising with TAs to prepare next steps for learning
- Preparing notes ready for review meetings
- Being involved in the preparation of reports for referrals to outside services
- Informing the SENDCo of progress, any growing concerns and requests for further intervention by outside agencies
- Keeping a log of visits by outside agencies (eg. observations) and appointments attended by individual children
- Directly liaising with parents of children with SEND
- Ensuring that their class SEND files, pupil SEND files and SEN Support Plans are kept updated
- Making themselves aware of the school's SEND policy and procedures for identification, monitoring and supporting pupils with SEND

Teaching Assistants

TAs should:

- Be fully aware of the schools' SEND policy and the procedures for identifying, assessing and making provision for pupils with SEND
- Use the school's procedure for giving feedback to teachers about pupils' progress
- 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
- Play an important role in implementing SEN Support Plans and monitoring progress.

Complaints

Complaints will be dealt with in accordance with the Complaints Policy and procedures. The policy can be found on the school website or requested at the school office.

Accessibility

St Mary's School has an 'Equality of duty' policy. We have wheelchair access using ramps and the availability of a stair lift should this be required. We have two disabled toilet provisions, one with a ceiling hoist and bed.

Dealing with bullying

St Mary's is an inclusive school and steps are taken to ensure and mitigate the risk of bullying of all pupils including those who are vulnerable at our school. Please see the anti-bullying policy and guidance, which is available on the schools' website.

Data Protection (GDPR): Storage and Management of Information

The procedures and practice created by this policy have been reviewed in the light of our Data Protection Policy.

All documents stored are in accordance with legal requirements where appropriate, and guidance from the Records Management Toolkit for Schools.

Each child's primary school record is retained for the length of time that the child remains at the school. Essential information such as attendance, medical records, unique pupil number, external data etc. is transferred onto the next school as they leave. Any information stored on the office computer system is archived.

Each class teacher has an online class SEND file with information relevant to the needs of that child. Any pupils at stage 3 or above also have an individual pupil file.

SEND pupil files are retained by the school for the DoB of the child +25 years.

This policy:

Has Few / No Data Compliance Requirements	Has A Moderate Level of Data Compliance Requirements	Has a High Level Of Data Compliance Requirements
	✓	