

MENTAL HEALTH AND WELLBEING POLICY

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1. Intent, aims and responsibilities

1.1. Statement of Intent

Stour Vale Academy Trust is committed to promoting positive mental health and emotional wellbeing for everyone in our community of schools; staff, governors, pupils and their families.

The following definitions of mental health illustrate and guide our approach. "Mental health is a state of well-being in which every individual realises his or her own potential, can cope with the normal stresses of life, can work productively and fruitfully, and is able to make a contribution to her or his community." (World Health Organisation: 2014)

"Mental Health is a positive concept rather than a deficit attribute. Mental health is a continuum, with good mental health at one end of the spectrum and mental illness at the other. We all move along this continuum and there will be times when most people need more support than at other times. Being able to recognise this is crucial in order to make positive changes." (Positive Mental Health - A Whole School Approach: Glazzard & Bostwick 2018)

1.2. Scope

- Section 1 of this document describes our approach to promoting positive mental health and wellbeing for all the members of our Trust community, staff and pupils alike. This policy is intended as guidance for all staff, parents and governors.
- Section 2 explains our commitments to our staff. This is common to all schools in the Trust.
- Section 3 relates to our support of pupils. This section is tailored to the needs of individual schools in the Trust.

This policy should be read in conjunction with the following policies in individual schools:

- Child Protection and Safeguarding policy regarding the reporting of concerns.
- Medical Policy (or equivalent) in cases where a pupil's mental health overlaps with or is linked to a medical issue.
- SEND policy where a pupil has an identified special educational need.
- Behaviour Policy (or equivalent)
- Policies on planned and unplanned absence of staff
- Flexible working policy

Which are available in schools and on the Trust's IT systems.

This policy takes into account the following documents:

- Keeping Children Safe in Education: (DfE, 2021)
- The Equality Act 2010
- The Special Educational Needs and Disability Code of Practice (DfE 2015)
- Promoting children and young people's emotional health and wellbeing: A whole school and college approach (PHE, 2021)
- The Education Staff Wellbeing Charter, (DfE, 2021)
- Health Survey 2017 The Mental Health and Wellbeing of Education Professionals (Education Support Partnership, 2017)

1.3. Consultation

This document takes into account a broad range of relevant literature and research. It was written in consultation with staff, pupils and parents, at the originating school and revised through consultation with Headteachers, local governing bodies of Stour Vale member schools and trades unions at the JCNC meeting on 19th April 2023.

1.4. Aims

Stour Vale Academy Trust promotes positive mental health for every pupil and staff member. In addition to promoting positive mental health, we recognise and respond to mental ill health. We pursue these aims through our:

- Culture and leadership: We promote trust and openness and a culture where we acknowledge our own and other's strengths and areas for development without fear of judgement. We recognise that staff wellbeing is not only a good thing itself but is critical in securing the best outcomes for our pupils. Trustees, members of Local Governing Bodies and school leadership teams commit to The Education Staff Wellbeing Charter (DfE, 2021). Collaboration is one of the fundamental values of Stour Vale and we believe that this supports staff at all levels by encouraging them to share ideas, experience, skills, and workload with colleagues across the Trust.
- **Support for Pupils:** Pupils receive helpful education in managing mental health, resilience and how to support others. Mental Health is framed positively, with a focus on developing resilience and finding solutions rather than a list of mental health problems. Staff know pupils well, recognise their needs, and teach them how to seek help and feel confident in doing so.
- **Support for Staff:** (a full version of The Education Staff Wellbeing Charter is included in Appendix B). We commit to develop a long-term strategy for improving staff wellbeing that will:
 - o Prioritise staff mental health
 - o Give staff the support they need to look out for their own and other people's wellbeing
 - o Give managers access to the training, tools and resources they need to support the wellbeing of those they line manage
 - o Establish a clear communications policy
 - o Give staff voice in decision-making
 - o Drive down unnecessary workload
 - o Champion flexible working
 - Champion diversity
 - o Create a good behaviour culture
 - Support staff to progress in their careers
 - o Hold ourselves accountable, including by measuring staff wellbeing
- **Clear Systems:** Staff know how to support their pupils and each other. There are clear referral systems in place for pupils, and staff know how to seek support for themselves and their colleagues.
- Excellence in Training: Teachers and other school staff are not trained medical professionals. However, all staff are supported through regular training to identify the signs of mental health conditions and how to refer pupils for additional support. Each school has a Mental Health Lead who supports the training of other staff, making use of professional development opportunities from a range of mental health training providers.

1.5. Responsibilities

This policy aims to ensure all staff are supported to promote and support the mental health of pupils and each other.

1.5.1. General Responsibilities

If a member of staff is concerned about the mental health or wellbeing of a pupil, in the first instance they should speak to the appropriate staff member in school. If there is a concern that the pupil is high risk or in danger of immediate harm, the school's safeguarding procedures should be followed. If the child presents a high-risk medical emergency, relevant procedures should be followed, including involving the emergency services if necessary.

If a member of staff is concerned about the mental health or wellbeing of a colleague or themselves, they should avoid the potential for speculation and gossip and, if necessary, talk to the school's Mental Health Lead, a mental health first aid trained colleague (if available), their line manager or a member of the leadership team for confidential support. The manager / MH Lead will ensure that the employee concerned is provided with appropriate support. The Trust has engaged a confidential mental health resource to provide practical advice and support, including on-line counselling on issues, both inside and out of school, that might impact wellbeing.

Possible warning signs in pupils and staff, which all staff should be aware of might include:

- Physical signs of harm that are repeated or appear non-accidental
- Changes in eating / sleeping habits
- Increased isolation from friends or family, becoming socially withdrawn
- Changes in activity and mood
- Lowering of academic achievement or performance
- Talking or joking about self-harm or suicide
- Abusing drugs or alcohol
- Expressing feelings of failure, uselessness or loss of hope
- Changes in clothing e.g. long sleeves in warm weather
- Secretive behaviour
- Skipping PE or getting changed secretively
- An increase in lateness to, or absence from school/work
- Repeated physical pain or nausea with no evident cause

1.5.2. Specific Responsibilities

- **Designated Mental Health Lead** Each headteacher will nominate a colleague to be the Mental Health Lead. This person acts as a point of contact for parents, pupils, staff and external agencies and represents a strategic commitment to mental health. The Mental Health Lead ensures that mental health provision is appropriately led, managed and evaluated. A key part of the role is to focus on whole school approaches to promote good mental health.
- Designated Safeguarding Lead (and deputy DSLs) The role of DSL with regard to this policy is to ensure that school safeguarding procedures are understood and followed with respect to issues associated with the mental health of pupils.
- **Special Educational Needs Coordinator** The role of SENCo with regard to this policy is to assess and support pupils on the SEND register

designated as SEMH.

• Mental Health First Aiders – In some Trust schools, Mental Health First Aiders are trained to provide informal support and advice to teaching staff outside of the line-management structure. A list of Mental Health First Aiders will be kept alongside the conventional First Aid trained staff.

1.6. Workload Impact Assessment

This is a new policy, written with the input of staff, parents and pupils. It imposes no new duties on teaching or support staff. The process of raising concerns and managing disclosures is the existing statutory process covered in the Child Protection and Safeguarding Policy. Any additional training for teaching staff will be delivered during directed time. The Policy defines a new role of designated Mental Health Lead. The full workload impact assessment for this policy is included in Appendix C.

1.7. Policy Review

This policy will be reviewed in consultation with trades unions and other stakeholders every three years unless significant changes to national policy and quidance require a more frequent review.

2. Supporting Colleagues

2.1. Organisational Commitments

Stour Vale Academy Trust commits to prioritising the mental health and emotional wellbeing of its staff. We recognise that working with children and young people can, on occasions, be challenging, whatever your role. Our principles embody our approach to mental health and wellbeing. We promote trust and openness and a culture where we acknowledge our own and others' strengths and areas for development without fear of judgement. Trustees of Stour Vale Academy Trust, members of Local Governing Bodies and school leadership teams commit to *The Education Staff Wellbeing Charter* (DfE, 2021). The eleven organisational commitments can be found in Appendix B.

In particular, Stour Vale Academy Trust, the Trustees, local governing bodies and Leadership Team commit to:

- **Prioritise staff mental health.** This means we will tackle mental health stigma and give the same consideration and support to mental health as physical health. We will measure staff wellbeing and act on the findings.
- Minimise organisational stresses and avoid unnecessary workload. Much organisational stress can be caused by unreasonably short deadlines, last-minute changes, ICT failures, poor behaviour of pupils and time pressures. We discourage a long-hours culture and encourage sound forward planning.
- Give all staff a **sense of secure autonomy**. We employ the best staff and trust them to do their job with autonomy and to deliver the best possible outcomes for children.
- Maintain systems to support the quality of relationships between colleagues and pupils, including school behaviour policies, designed to reduce conflict and deal with unacceptable behaviour, maintaining a calm, safe and disciplined environment.
- Encourage and model a **culture of support** from colleagues and line managers. Line managers are trained to support their colleagues and recognise the early signs of mental ill health.
- Effective management of change. We acknowledge that change can be stressful although necessary to ensure that our ways of working and structures are efficient and produce the best possible outcomes for pupils. Change, when necessary, is managed through consultation and clear communication, with a focus on staff workload and secure autonomy.

2.2.Workload

- Leaders will work proactively to drive down unnecessary workload, using resources such as the Workload Reduction Toolkit.
- School calendars will be planned in advance of the new school year and will pay due regard to directed time for teachers and other contractual matters.
- Workload will be planned to avoid conflicting deadlines. Any changes to the plan will be made with as much notice as possible and due regard to staff workload.
- Any change to policy or process will be subjected to a workload assessment and staff will be consulted prior to any changes being implemented. The full workload impact assessment for this policy is included in Appendix C.

- Senior and middle leaders recognise that they have a responsibility not to (even subconsciously) project an attitude that leads to a long-hours culture and recognise they have a responsibility to role model a healthy attitude towards both work and home life.
- Flexibility is supported in line with flexible working and planned absence policies.

2.3.Communication and engagement

Clear guidelines for electronic communication are provided. The aim is to minimise unnecessary communication and reduce pressure on staff and there is no expectation on staff generally to answer emails sent out of school hours before they are next in work.

Meetings are timetabled in advance with a clear focus and outcomes. The chair of each meeting should endeavour to stick to time and provide a brief summary of decisions and agreed actions.

Staff voice is actively sought in all decision making. Any change to policy or process that impacts on the staff body is consulted upon.

We look for ways to encourage a sense of community with non-work-related social activities.

2.4. Warning Signs

Staff may become aware of warning signs (see para 1.5.1 above) which indicate a colleague is experiencing mental health or emotional wellbeing issues. These warning signs should always be taken seriously and staff observing any of these warning signs should take appropriate steps to support their colleague, if appropriate by talking to the school's Mental Health Lead, a mental health first aid trained colleague (if available), their line manager or a member of the leadership team for confidential support.

2.5. Staff Training

As a minimum, all staff will receive regular training on recognising and responding to mental health issues as part of their regular child protection training to enable them to keep pupils safe. Nominated members of staff will also receive professional Mental Health First Aid training. Staff training will take place during directed time and will be part of the annual CPD plan. At times, the training plan may be altered to address an emerging need.

Training opportunities for staff who require more in-depth knowledge will be considered as part of our performance management process and additional CPD will be supported throughout the year where it becomes appropriate due to developing situations.

3. Section 3 - Supporting Pupils

3.1 Raising concerns and managing disclosures

Disclosures associated with a student's mental health will be treated in the same way as any other safeguarding disclosure.

Staff should report any concerns via the safeguarding@earls.dudley.sch.uk email and copy to the relevant Year Coordinator. Our safeguarding procedures are fully embedded and well understood by all staff. Staff have a duty to report minor concerns because these can help to build up a bigger picture. The relevant sections of the school's Safeguarding and Child Protection Policy are:

Section 6 – Confidentiality

Section 7 – Communication with Parents

Section 8 – Whole staff responsibilities and school procedures

Section 9 - Dealing with disclosures (and Appendix 2)

Concerns regarding a student's mental health will be logged on CPOMS by the safeguarding team and actioned appropriately.

3.2 Teaching about mental health

The skills, knowledge and understanding our students need to keep themselves, and others, physically and mentally healthy and safe are included as part of our PSHE curriculum and our assembly programme.

We will follow the guidance issued by the PSHE Association to prepare us to teach about mental health and emotional health safely and sensitively. Mental health and emotional wellbeing teacher guidance (pshe-association.org.uk). Incorporating this into our curriculum at all stages is a good opportunity to promote students' wellbeing through the development of healthy coping strategies and an understanding of students' own emotions as well as those of other people. This building of resilience is central to our teaching about mental health.

Additionally, we will use such lessons as a vehicle for providing students who do develop difficulties with strategies to keep themselves healthy and safe, as well as supporting students to support any of their friends who are facing challenges. Our current PSHE curriculum maps can be found by following this <u>link</u> for KS3 and this <u>link</u> for KS4.

The use and misuse of Social Media has a significant impact on the mental health of our students. Managing the use of Social Media and avoiding its pit falls is included in our PSHE programme, our KS3 ICT curriculum and through frequent assemblies.

We acknowledge that necessary Pre-pupil and public exams can induce significant stress for our students, especially in KS4. Managing this stress is a major focus of our Year 10/11 parents information evenings, where support is provided for parents and students.

33 Supporting pupils with Mental Health Issues

Support exists through both the SEND system and pastoral/safeguarding teams. Some students are identified as having a special educational need within the core area of Social, Emotional and Mental Health (SEMH). These students will be supported according to the processes described in the School SEND Policy under the direction of the SENCO.

We recognise that many students, not on the SEND register will from time to time suffer with their mental health, and these students will receive support through the pastoral system. It is when a student's mental health concerns begin to have a significant and sustained impact on their learning that they will be considered by the SENCO for support under the SEND structure.

The mental health of some students will have a negative impact on their behaviour around school. To minimise this impact while supporting mental health, we base our behaviour code on simple principles, consistently applied and positively framed, with an emphasis on restorative practice. When staff apply our behaviour system they have a responsibility to respect individual students and be aware of their specific needs.

3.3.1 Warning Signs

Staff may become aware of warning signs which indicate a student is experiencing mental health or emotional wellbeing issues. These warning signs should always be taken seriously and staff observing any of these warning signs should alert the appropriate member of the pastoral team and SENCO where appropriate.

Possible warning signs, which all staff should be aware of include:

Physical signs of harm that are repeated or appear non-accidental

- Changes in eating / sleeping habits
- Increased isolation from friends or family, becoming socially withdrawn
- Changes in activity and mood
- Lowering of academic achievement
- Talking or joking about self-harm or suicide
- Abusing drugs or alcohol
- Expressing feelings of failure, uselessness or loss of hope
- Changes in clothing e.g. long sleeves in warm weather
- Secretive behaviour
- Skipping PE or getting changed secretively
- Lateness to, or absence from school
- Repeated physical pain or nausea with no evident cause
- An increase in lateness or absenteeism

3.3.2 Sources of Support

Sources of support for students are grouped under the following three categories:

- School Based Support
- Community Support
- Online support

We will ensure that staff, students and parents/carers are aware of the support and services available to them, and how they can access these services. Within the school (noticeboards, social spaces, toilets etc.) and through our communication channels (newsletters, website), we will share and display relevant information about local and national support services and events.

The aim of this is to ensure students understand:

- What help is available
- Who it is aimed at
- How to access it
- Why should they access it
- What is likely to happen next

3.3.3 Targeted Support

We recognise some children and young people are at greater risk of experiencing poorer mental health. For example, those who are in care, young carers, those who have had previous access to CAMHS, those living with parents/carers with a mental illness, those living in households experiencing domestic violence and those who identify as LBGTQ+.

We ensure timely and effective identification of students who would benefit from targeted support and ensure appropriate referral to support services by:

- Providing specific help for those children most at risk (or already showing signs) of social, emotional, and behavioural problems.
 - Working closely with Dudley Children's Services, CAMHS, Reflexions and the school nursing service.
 - Carrying out an Early Help Assessment for children who are showing early signs of anxiety, emotional distress, or behavioural problems.
 - Discussing options for tackling these problems with the child and their parents /carers.
 - Providing a range of interventions that have been proven to be effective.
 - Ensure young people have access to pastoral care and support, as well as specialist services so that emotional, social and behavioural problems can be dealt with as soon as they occur.
- Provide young people with clear and consistent information about the opportunities available for them to discuss personal issues and emotional concerns.
 - Provide young people with opportunities to build relationships, particularly those who may find it difficult to seek support when they need it.
 - The identification, assessment, and support of young carers under the statutory duties outlined in the Children & Families Act 2014.

3.4 Working with parents

Unless there is an overwhelming safeguarding concern, parents should be involved in discussions and interventions that support their children's mental health and wellbeing. We are mindful that for a parent, hearing about their child's issues can be upsetting and distressing. They may therefore respond in various ways which we should be prepared for and allow time for the parent to reflect and come to terms with the situation.

Signposting parents to other sources of information and support can be helpful in these instances. At the end of the meeting, lines of communication should be kept open should the parents have further questions or concerns. Booking a follow-up meeting or phone call might be beneficial at this stage.

The pastoral team will ensure a record of the meeting and points discussed/actions agreed are added to the pupil's record as an action on CPOMS and an Pastoral support plan created if appropriate.

3.5 Working with parents

As a minimum, all staff will receive regular training about recognising and responding to mental health issues as part of their regular child protection training to enable them to keep students safe. Nominated members of staff will also receive professional Mental Health First Aid training. Staff training will take place during directed time and will be part of the annual CPD plan. At times, the training plan may be altered to address an emerging need.

Training opportunities for staff who require more in depth knowledge will be considered as part of our performance management process and additional CPD will be supported throughout the year where it becomes appropriate due developing situations with one or more students.

Appendix A – Resources to support staff

We support the view in the Education Staff Wellbeing Charter that staff should be empowered to take ownership of their own wellbeing and look out for the wellbeing of others. We will ensure that staff know how to access appropriate training, guidance, support and tools.

<u>Qwell</u> – Online emotional wellbeing and mental health support for Stour Vale staff and their families

<u>Supporting staff wellbeing: Mentally Healthy Schools</u> – a website from The Anna Freud Centre with a directory of useful resources

<u>Supporting Staff (annafreud.org)</u> – A site where you can find out more about staff wellbeing, and access useful tools and resources to help, on the Anna Freud Centre's '5 Steps to Mental Health and Wellbeing' framework

<u>Home | Education Support</u> – Education Support is a mental health charity dedicated to improving the health and wellbeing of teachers, teaching assistants, headteachers and support staff in schools and further education settings.

<u>Home - Mental Health At Work</u> - website curated by Mind, supported by The Royal Foundation. It is a first stop to find documents, guides, tips, videos, courses, podcasts, templates and information from key organisations across the UK, all aimed at helping individuals and organisations get to grips with workplace mental health.

Appropriate training for specific roles will be provided, along with regular awareness raising training for all staff.

Appendix B – Education Staff Wellbeing Charter

Organisational commitments

In signing this charter, this school, college or trust commits to placing wellbeing and mental health at the heart of our decision making. We will support staff to make positive choices for their own wellbeing and encourage a collegiate culture across and between all roles in the school or college. Specifically, we commit to develop a long-term strategy for improving staff wellbeing that will:

- 1 Prioritise staff mental health We will:
 - tackle mental health stigma within the organisation, promoting an open and understanding culture
 - give the same consideration and support to mental health as physical health, including in the management of staff absence
 - fulfil our legal duty to control the risks associated with work-related stress in the education setting so far as is reasonably practicable
 - channel support to individuals whose role is known to have a significant emotional component. This might take the form of peer support, supervision, and/or counselling
 - ensure that staff understand the real benefits that sensitive pastoral support can have, while also recognising where their limits are as non-specialists. We will therefore ensure there are opportunities to increase joint working in support of pupils, as well as routes to refer for specialist support
- 2 Give staff the support they need to take responsibility for their own and other people's wellbeing

We will empower staff to take ownership of their own wellbeing and look out for the wellbeing of others. This will include ensuring that all staff are familiar with the

- different dimensions of wellbeing, including mental health, financial wellbeing and physical wellbeing. We will ensure that staff know how to access appropriate guidance, support and tools, and that their use is encouraged throughout the organisation.
- 3 Give managers access to the tools and resources they need to support the wellbeing of those they line manage. We will work to provide managers with tools, resources and training to support their staff. We will not, however, expect managers to provide professional wellbeing support for which they have no professional training, and will ensure that there are clear routes in place to escalate for further support.
- 4 Establish a clear communications policy
 We will provide clear guidance to all
 stakeholders (internal and external) on
 remote and out-of-school/college hours
 working, including when it is and isn't
 reasonable to expect staff to respond to
 queries. This should not necessarily include
 preventing staff from accessing email at
 'unsociable' hours if it suits them personally.
- 5 Give staff a voice in decision-making We will constantly strive to improve the ways in which the voice of staff is included in the decision-making process across the college or school. (This may also include engagement with key stakeholders, such as recognised trade unions and others.) In particular, we will proactively seek to draw upon the experience of those with mental health issues and/ or of discrimination, ensuring that, as per commitment, they are able to share their experience confidently and safely.

- 6 Drive down unnecessary workload We will work proactively to drive down unnecessary workload, making use of available tools (such as the Workload Reduction Toolkit for schools).
- 7 Champion flexible working and diversity We will work to create a supportive culture around flexible working. We will agree an approach that not only recognises employees' legal right to request flexible working but acknowledges that for some staff working flexibly can be a key means of protecting and enhancing their personal wellbeing.

We will work to promote diversity – eliminating discrimination, and advancing equality of opportunity.

8 Create a good behaviour culture
We will work with staff and pupils to
maintain and implement a school-wide
behaviour policy. All staff and pupils will
have a shared understanding of how good
behaviour is encouraged and rewarded,
and the sanctions that will be imposed if
pupils misbehave. We will support teachers
to create calm, safe and disciplined
environments, which allow teachers to
teach and pupils to learn. Our approach will
go hand-in-hand with understanding and
supporting pupil mental health issues.⁴

9 Support staff to progress in their careers

We will ensure that staff are able to pursue professional development without adversely impacting their own or other people's workload. In schools, we will ensure that any professional development activity is aligned to the Standard for Teachers' Professional Development.

- 10 Include a sub-strategy for protecting leader wellbeing and mental health
 We will ensure that all those with strategic decision-making responsibility (including as appropriate governors and trustees) should collaborate to develop a substrategy specifically for protecting leader mental health. This should include access to confidential counselling and/or coaching where needed.
- 11 Hold ourselves accountable, including by measuring staff wellbeing
 We will measure the wellbeing of staff using recognised tools and metrics and be transparent about results. We will monitor trends over time, and act in response to changes.⁵ Further, we will work with staff and relevant stakeholders (this might include parents, recognised trade unions and others) to agree an approach to organisational accountability on our commitments, giving due consideration to workload.

⁴ Please refer to DfE's guidance on mental health and behaviour: www.gov.uk/government/publications/mental-health-and-behaviour-in-schools-2.

⁵ Please refer to charter's host page www.gov.uk/guidance/education-staff-wellbeing-charter for guidance on these tools and their limitations.

Appendix C – Workload Impact Assessment

Policy	Mental Health & Wellbeing
Proposed date of implementation	September 2023

The following checklist should be used and made available to staff on completion before a new or revised policy is introduced.

· ·						
Criteria	Yes/N o	Additional notes				
The policy complies with and is consistent with staff contractual entitlements.	Yes					
The policy and any related procedures will be introduced following consultation with the trades unions.	Yes	Consultation with trades unions took place at Trust-wide level on 19 th April 2023.				
The policy and any related procedures include a specific statement regarding workload impact.	Yes	Throughout the document and specifically in section 1.6				
The policy has been piloted/trialled to enable an assessment of workload impact to be made.	No	Any actions for teaching and support staff are consistent with their current duties under the Child Protection and Safeguarding Policy and general responsibilities for Health & Safety.				
The policy and related procedures have not added additional hours of working, or limited/reduced other school procedures.	Yes	As above. In addition, the policy draws on the work of the NEU and NASUWT both of whom contributed to the "Education Staff Wellbeing Charter" which this policy adopts.				
The policy does not duplicate any other existing policy.	Yes	There are no similar policies in place.				
Any similar policies have been reviewed to assess whether any are outdated and unnecessary.	Yes	There are no similar policies in place.				
The Trust and member schools will identify the resources necessary to support the policy, including staff time, any additional support staffing and appropriate equipment.	Yes	This will include allocated management time for the MH Lead in schools.				
Implementation of this policy will not result in additional meetings/activities that have not been identified within school calendars.	Yes	There are no additional meetings associated with this policy. Any whole staff training will be conducted during directed / contracted time.				
All staff will have training to ensure that the policy and any related procedures are carried out without increasing workload burdens.	Yes					
The policy and related procedures are reviewed regularly to ensure that additional workload burdens have not been added over time.	Yes	Reviewed every three years, or sooner in the event of legislative changes.				