AMDG



Donhead Preparatory School <u>Special Educational Needs and Disabilities (SEND) Policy</u>

Donhead Preparatory School has a named SENDCo (Ms Plech-Blair), a SEND Teacher (Miss Winship; who is a qualified teacher) and a named SEND Link Governor responsible for SEND (Mrs Sophie Heyman). They ensure that the Donhead Special Educational Needs policy works within the guidelines of the SEND Code of Practice (January 2015) and other policies current within the school.

At Donhead Preparatory School it is the belief that all children have an equal right to a full and rounded education which will enable them to achieve their full potential. We use our best endeavours to secure special educational provision for pupils for whom this is required, that is 'additional to and different from' that provided within the differentiated curriculum to better respond to the four areas of need identified in the new SEND Code of Practice (January 2015), as follows:

- Communication and interaction
- Cognition and learning
- Social, mental and emotional health
- Sensory/physical

It helps the school to achieve its Mission Statement in the following areas:

- The pursuit of excellence
- Welcoming all
- Helping those who need our help the most
- Care for the individual
- Celebrate the talents of all

As far as possible, the curriculum responds to the formation needs of individuals, including extra-curricular provision and the allocation and use of resources (Jesuit School Vision Statement).

This policy should be read in conjunction with the following school policies: Accessibility Policy, Admissions Policy, Safeguarding Policy, Curriculum Policy, First Aid Policy, Equal Opportunities Policy, English as an Additional Language — all of these are either available on the school website or by contacting the School Office

Introduction - Cura Personalis

The Headmaster and staff at Donhead are committed to helping all Donhead Preparatory School pupils explore their abilities and talents through which they can make their individual contribution to the whole school community. This may be through the wide range of opportunities provided by the academic subjects taught in class, and through Music, Art and Drama which are available to all the boys at Donhead. In each of these areas, boys are expected to aim for the highest possible level which they can achieve. Not every child will excel in every area, but the achievement of each boy is celebrated – for doing his best and trying his hardest.

This Policy is inclusive, and sets out the ways in which the school makes provision for:

- The entitlement of all children to access the curriculum through quality first inclusive teaching.
- Those pupils who may need additional support during their time at Donhead Preparatory School in order to achieve their potential.

Aims and objectives

The aims of this policy are to:

- Create an environment that meets the special educational needs of each child in order that they can achieve their learning potential and engage in activities alongside pupils who do not have SEND.
- Request, monitor and respond to parents/carers and pupil's views in order to evidence high levels of confidence and partnership.
- Make clear the expectations of all partners in the process.
- Ensure a high level of staff expertise to meet pupil need, through well targeted continuing professional development.
- Ensure pupils with medical conditions have full inclusion in all school activities, by ensuring consultation with health and social care professionals. see First Aid Policy
- Identify the roles and responsibilities of all staff in providing for children's special educational needs through reasonable adjustments to enable all children to have full access to all elements of the school curriculum.
- Work in cooperation and productive partnerships with the Local Education Authority and other outside agencies, to ensure there is a multi-professional approach to meeting the needs of all vulnerable learners.

Definitions

What are Special Educational Needs? Definition of SEND

A child or young person has SEND 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 (SEND Code of Practice January 2015, page 15 & 16)

Disabled children

Many children and young people who have SEND may have a disability under the Equality Act 2010 – that is '...a physical or mental impairment which has a long-term and substantial adverse effect on their ability to carry out normal day-to-day activities'. This definition provides a relatively low threshold and includes more children than many realise: 'long-term' is defined as 'a year or more' and 'substantial' is defined as 'more than minor or trivial'. This definition includes SENDsory impairments such as those affecting sight or hearing, and long-term health conditions such as asthma, diabetes, epilepsy, and cancer. Children and young people with such 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. SEND Code of Practice (January 2015, p. 16)This SEND policy details how, at Donhead, we will do our best to ensure that the necessary provision is made for any pupil who has SEND and that those needs are known to all who are likely to work with them. We will ensure that teachers are able to identify and provide for those pupils with special educational needs, allowing them to

join in all school activities together with pupils who do not have special educational needs.

(I) Pupils may experience difficulty with learning for a variety of reasons, and it is beyond the remit of this document to consider these in detail. Since children learn at different rates, a child who falls behind his peers may have a developmental need which will be met through targeted classroom support. Occasionally, pupils' learning needs do not respond speedily through targeted classroom support alone, and they may have specific difficulties such as dyslexia or general difficulties (or a mix of both). They may be offered additional support, through small group or 1:1 activities, in order to boost their skills level and confidence.

Admissions Arrangements

Pupils identified with SEND have the same rights of application as all other prospective pupils.

The school liaises with pupils' previous educational setting to ensure the best educational provision is in place for those with SEND. The school buildings provide physical access for pupils with mobility needs.

An application from the parent of a child who has SEND but who does not have an Education, Health and Care Plan (EHC) Plan, will be considered in accordance with the school's published admission arrangements.

It is a requirement that any information or reports from educational or healthcare professionals is shared by the parents with the school to ensure that appropriate support, if available, is put in place to meet your son's needs and ensure full participation in school life, on application. When appropriate, the SENDCo will contact and visit child's previous educational setting.

For pupils who have an Education Health Care Plan (EHCP), there is a formal process when the school is formally consulted by the Local Authority where the child is a resident.

Identification, Assessment and Provision

Provision for children with SEND is a matter for the whole school. The Governing Body, the Headmaster, the SENDCo and all other members of staff, particularly Form Teachers and Teaching Assistants, have important day—to—day responsibilities. All teachers are teachers of children with special educational needs.

The school will assess each child's current levels of attainment on entry in order to ensure that they build on the patterns of learning and experience already established during the child's pre-school years. If the child already has an identified SEND, this information is requested and will be transferred from the child's previous educational setting and will be used to:

- Provide starting points for the development of an appropriate curriculum.
- Identify and focus attention on the action necessary to support the child within the class.
- Use the assessment processes to identify any learning difficulties.
- Ensure ongoing observation and assessments provide regular feedback about the child's achievements and experiences to form the basis for planning the next steps of the child's learning.

The identification and assessment of the SEND of children whose first language is not English requires particular care. Where there is uncertainty about a particular child, a teacher will look carefully at all aspects of the child's performance in different subjects to establish whether the problems are due to limitations in their command of English or arises from special educational needs. There is a separate policy for pupils whose first language is not English.

It is important that all our teachers and Teaching Assistants (TAs) are aware of the cognitive potential of our pupils, to help select inclusive ways of working with our pupils at the appropriate level for each one, and as a marker to ensure that the pupil does not underachieve. Pupils' progress is carefully monitored. Please see the Curriculum Policy.

The Graduated Approach (Assess-Plan-Do-Review) to supporting a pupils' learning.

Wave 1: Universal

At the universal level all pupils will receive high quality teaching, differentiated for individual needs. Details of pupil's individual needs will be disseminated to Form and Subject Teachers; enabling them to make reasonable adjustments. These adjustments are the first step to responding to pupils with SEND and assist teachers with the cycle of planning, assessment and evaluation that takes account of the abilities, aptitudes and interests of all pupils. Additional intervention and support cannot compensate for a lack of good quality teaching. As such, Form and Subject Teachers are responsible and accountable for the progress and development of all the pupils in their class; including pupils with SEND. It is anticipated the majority of pupils make the expected progress at the universal level.

Wave 2: Targeted

Should a pupil not make the expected progress within the universal arrangements; it may be appropriate to consider making additional interventions to remove or reduce any obstacles to their learning. This takes the form of a graduated four-part approach of a) assessing your child's needs, b) planning the most effective and appropriate intervention, c) providing this intervention and d) reviewing the impact on your child's progress towards individual learning outcomes. These interventions will be carefully planned, delivered and reviewed by the Form Teacher or TA under Teacher's directions (Reception through to PP2). For example, these may include small group or 1:1, short, follow up sessions linked to social and language skills, phonics, writing or number work.

For pupils in Lower Prep 1 through to Elements, there may be additional interventions delivered outside of their lesson within the Learning Support Department. Form/Class Teachers are required to liaise about the focus and pupils' progress with the person delivering the interventions on regular basis, at least once a term.

Wave 3: Specialist

In a minority of cases it may be necessary to seek specialist advice and regular long-term support from external specialist professionals. In seeking the advice external professionals, the school will seek to enhance educational opportunities and to plan for the best possible learning outcomes. This may include referrals to the Educational Psychologist (EP), the Speech and Language Therapist (SALT), Occupational Therapist (OT), Specialist Teachers and the Child and Adolescent Mental Health Service (CAMHS). The school will need to prioritise referrals to these services. Pupils who are receiving Wave 3 support will be added to the school SEND Support List. This document contains details about pupil's difficulties, and strategies for teachers to follow which will support his learning in the classroom. Strategies set out in independent specialist reports will be included. It is essential that Form/ Class Teachers cooperate with the outside professionals. Any recommendations from professionals, form an integral part of individual child's education and are part of the four-part approach of assess/plan/do/review. Classroom based targets for individual students are set by the class teachers with SENDCo.

Reasons for a child being added to the SEND Support List may include the fact that the pupil:

- Makes little or no progress, even when teaching approaches are targeted particularly in a child's identified area
 of weakness.
- Shows signs of difficulty in developing literacy or mathematics skills which result in poor attainment in some curriculum areas.
- Presents persistent emotional or behavioural difficulties which are not improved by the behaviour management

- techniques usually employed in the school.
- Has sensory or physical problems, and continues to make little or no progress, despite the provision of specialist equipment.
- Has communication and/or interaction difficulties, and continues to make little or no progress.

Roles & Responsibilities

The role and responsibilities of the Governing Body:

The Governing Body challenges the school and its members to secure necessary provision for any pupil identified as having SEND. They ask probing questions to ensure all teachers are aware of the importance of providing for these children and ensure that funds and resources are used effectively and appropriately by:

- Ensuring that the best possible provision is made for all pupils with SEND.
- Monitoring the quality of SEND Provision.
- Ensuring information about the implementation of the policy for SEND is reviewed on the school website and this is updated regularly.
- Ensuring the integration of pupils with SEND in the school community.
- Electing a designated SEND Governor who liaises with the SENDCo termly.

The role and responsibilities of the Members of the Senior Leadership Team:

- The day to day management of the SEND Policy and the Disability Equality Duty Scheme and Accessibility Plan
- Allocating and monitoring appropriate resources for SEND and EHCP funding together with the SENDCo and Bursar
- Ensuring the effective use of the SEND COP (Code of Practice) especially through professional development and appropriate time allocations
- Monitoring teachers' planning, reporting and pupil achievement

The role and responsibilities of the SENDCo:

- Overseeing the day-to-day operation of the school's SEND policy
- Co-ordinating provision for children with SEND
- Collaborating with the class teacher to match classroom provision to the specific needs of the pupil
- Scheduling TA support. This include providing timetables in conjunction with the Head of Pre Prep/Prep.
- Liaising with the relevant Designated Teacher where a looked after pupil has SEND
- Advising on the graduated approach to providing SEND support
- Advising on the deployment of the school's budget and other resources to meet pupils' needs effectively
- Liaising with parents of pupils with SEND after the form teacher tried initial support/differentiation over time and reviewed with parental involvement.
- Liaising with early years providers, other schools, educational psychologists, health and social care professionals, and independent or voluntary bodies
- Being a key point of contact with external agencies, especially the local authority and its support services
- Liaising with previous and potential next providers of education to ensure a pupil and their parents are informed about options and a smooth transition is planned
- Working with the Headmaster and school governors to ensure that the school meets its responsibilities under the Equality Act (2010) with regard to reasonable adjustments and access arrangements
- Ensuring that the school keeps the records of all pupils with SEND up to date
- Completing and contributing to relevant assessments for the purpose of identification of pupils' needs and to inform further action with regards to support.

• The SENDCo liaises with the Head of Assessments and Prep School to ensure that appropriate timetable and room allocation are in place for the exams for pupils who have Exam Access Arrangements.

The role and responsibilities of All Teachers:

- The Class Teacher is responsible and accountable for progress and development of all pupils in their class.
 Teachers have opportunities to talk about individual pupil's progress at Parent Evenings or at individual meetings, should a need to hold one arise.
- Informing parents of concerns and the interventions that are proposed and involving them in any reviews of their child's progress.
- It is paramount that teachers' concerns are discussed in a sensitive way with the parents of individual pupil first, before being referred to the SENDCo. SENDCo will only contact the parents once concerns are shared with them by the Form/Class teacher.
- The teaching and monitoring of all their pupils and identifying and reporting any concerns about SEND to the SENDCo and their line manager, using the Records of Concern Form.
- Reporting ongoing concerns directly to the SENDCo when these arise.
- Familiarising with the information about pupils with SEND for their classes.
- Planning and delivering Wave 2 differentiated interventions with the support of Teaching Assistants. These
 should be additional to or different from those provided as part of the school's usual differentiated curriculum.
 Records of these intervention to be kept in a Wave 2 folder as these will be used as evidence and to build history
 of need.
- Reviewing the effectiveness of the interventions in securing progress to inform the next steps in a graduated approach for support and informing the SENDCo at least once a term.
- Termly monitoring of progress and target setting to track progress towards these goals through the use of formative and summative assessment.
- Completing SEND documentation in accordance with the COP and liaising with the SENDCo, parents and pupils
- Providing feedback and evidence of individual pupil's progress to the SENDCo when and in a format requested
- Setting termly SMART targets and reviewing individual pupil's progress as in conjunction with the SENDCo, SEND
 TA and as informed by professional reports
- Collaborating with the SENDCo to match classroom provision to the specific needs of the pupil
- As part of the graduated approach to collaborate with outside specialists and work with the advice of the specialists to plan targets and provision.
- Planning with learning support assistants to ensure quality provision for pupils with SEND, including Wave 2 and targeted interventions
- Regularly reviewing the support provided by staff and the impact on pupils with SEND.
- The Class Teacher in co-operation with the Head of Pre- Prep, Prep School and SENDCo are responsible for the timetabling and directed work load of the additional staff
- The Class Teacher is responsible for ensuring that the timetable and room allocations for pupils who have Exam
 Access Arrangements can use these as their normal way of working and are adhered to during assessments and
 exams.
- Supports students who use a laptop or alternative ways of recording information and using Exam Access Arrangements so that these become their normal way of working.

The role and responsibilities of the Teaching Assistants (TAs):

• Teaching Assistants work under the direct instruction of the Classroom Teacher and the SENDCo, usually in the classroom to support the learning for pupils with SEND and provide general support to the teacher in the

management of pupils and the classroom.

Additionally, they assist with:

- Collecting evidence of progress through observations.
- Alerting the class teacher and SENDCo to concerns which have been observed through close working with the pupils.
- Helping the Class/Form Teacher to track progress towards outcomes set by the teacher for specific pupils with SEND.
- Providing effective feedback to the teacher on interventions.
- Collaborating with the teachers and SENDCo to match classroom provision to the specific needs of the pupil
- Delivering personalised intervention programmes carefully planned by the teacher and directed by the SENDCo as per professional's advice.

There are regular meetings to identify needs and plan provision through:

- Regular SEND meetings (HM with SENDCo, and all Teaching Assistants)
- SEND Governor with the SENDCo
- Annual hand over meetings for the SENDCo and all teachers to discuss progress ensuring successful transition to next year or next education setting.

Monitoring Children's Progress

At Donhead the progress of all children is carefully monitored and reported to the parents. Please read the Curriculum Policy. When a pupil is not making expected progress, teachers may need to consult the SENDCo to consider what else might be done. This review might lead to the conclusion that the pupil requires help over and above that which is normally available within the class or subject. Please refer to the role and responsibilities of All Teachers above for further clarification.

Expected progress can be identified as that which:

- Prevents the attainment gap between the child and his peers from widening
- Closes the attainment gap between the child and his peers
- Betters the child's previous rate of progress
- Ensures access to the full curriculum
- Demonstrates an improvement in self-help, social or personal skills
- Demonstrates improvements in the child's behaviour

In order to help our pupils, Donhead will adopt the Graduated Approach (please see above). This may involve using specialist expertise if, as a school, we feel that our interventions are still not having an impact on the individual. The school will record the steps taken to meet the needs of individual children through the use and review of SMART targets and the SENDCo will have responsibility for ensuring that records are kept and available when needed. If we refer a child for an Education Health and Care Plan, we will provide the LEA with a record of our work with the child to date. Parents are involved in this process form the start.

Partnership with parents

Parental voice and pupil voice are also important contributors to building a full profile of each boy at Donhead, and pupils and parents are asked to help the school in this task by ensuring the school is aware of the abilities and talents of each

Donhead pupil. Thus, partnership plays a key role in enabling children and young people with SEND to achieve their potential. Parents hold key information and have knowledge and experience to contribute to the shared view of a child's needs. All parents of children with special educational needs will be treated as partners given support to play an active and valued role in their child's education.

Children and young people with SEND often have a unique knowledge of their own needs and their views about what sort of help they would like. They will be encouraged to contribute to the assessment of their needs, the review and transition process.

We aim to support pupils with identified SEND. Therefore, it is essential/ it is a requirement that any information or reports from educational or healthcare professionals is shared by the parents with the school to ensure that appropriate support is put in place to meet your son's needs and ensure full participation in school life.

The school website contains details of our policy for special educational needs, including the arrangements made for children in our school with SEND. There is a section on the website dedicated to SEND including more details for parents and has contact to SENDCo directly.

At all stages of the special needs process, the school keeps parents fully informed and involved. We take account of the wishes, feelings and knowledge of parents at all stages. We encourage parents to make an active contribution to their child's education and have regular meetings or correspondence each half term to share the progress of special needs children with their parents. We seek the parents' permission for any outside intervention and share the process of decision-making by providing clear information relating to the education of their child. Parents always have access to the SENDCo through a school email address.

The Nature of Intervention

We support children in a manner that acknowledges their entitlement to share the same learning experiences that their peers enjoy. There are times when some pupils need to move at a slower pace, or need to revisit information a number of times because they process more slowly or have difficulty retaining their learning, or require additional support to make progress in their learning. Pupils in Pre-Prep have some additional classroom or withdrawal support provided as Wave 2 intervention. Pupils in Prep have opportunities to work for two hours daily in much smaller sets for English and Maths. From time to time, the SENDCo, SEND teacher or SEND TA will provide specific, individual specialist teaching to help a pupil from any year develop strategies to manage a learning difficulty which has been identified through assessment. All interventions take form part of the school day. This may include:

- Different learning materials or specialist equipment
- Some group or individual support, which may involve small groups of children being withdrawn to work with the SENDCo, SEND teacher, SEND TA, or other TA support, or other Wave 2 and Wave 3 intervention such as Toe by Toe, Alpha to Omega, OT exercise programs, etc.
- Staff development and training to introduce more effective strategies
- Meetings with outside professionals involved in support for individual pupils

After initial discussions with the SENDCo and/or outside professional, the child's Form Teacher will be responsible for working with the child daily and ensuring delivery of any individualised targets and strategies in the classroom.

This forms an integral part of that individual pupil's education that is most effective when delivered collaboratively. Parents will continue to be consulted and kept informed of the action taken to help their child, and of the outcome of any

action. Parents will be invited to meet regularly with the Form Teacher and/or SENDCo to discuss individual learning targets and progress with the SENDCo regularly. At times this can be done via emails.

The SENDCo, SEND teacher and TA will support further assessment of the child where necessary and practicable, assisting in planning for their future needs in discussion with colleagues and parents. Teachers use a range of strategies to meet children's special educational needs.

The use of outside agencies

If over a period of time, the child continues to make little or no progress despite considerable input and adaptations, the Class Teacher, in the first instance, or SENDCo, following consultation with the Headmaster, will discuss with the parent whether to seek advice from other professionals outside the setting, e.g. Early Years Intervention Team (EYIT), Child Development Team (CDT), specialist teacher, educational psychologist (EP), speech and language therapist (SALT), Occupational Therapist (OT) or other health professionals. This may be an observation with further strategies for support, or a full assessment. The cost of specialist assessments and additional testing is normally borne by the parents, although it is helpful if parents work in partnership with the school to set up external observations or assessments. They will use the child's records in order to establish which strategies have already been employed and which targets have previously been set. The external specialist may act in an advisory capacity or provide additional specialist assessment or be involved in teaching the child directly. The child's individual targets will set out strategies for supporting the child's progress. These will be implemented, at least in part, in the normal classroom setting. The delivery of the interventions recorded in a SMART Plan continues to be the responsibility of the class teacher.

Outside agencies may become involved if the child:

- Continues to make little or no progress in specific areas over a long period.
- Continues working at levels substantially below that expected of children of a similar age.
- Continues to have difficulty in developing literacy and mathematical skills.
- Has emotional or behavioural difficulties which regularly and substantially interfere with the child's own learning or that of the class group.
- Has Sensory or physical needs and requires additional specialist equipment or regular advice or visits by a specialist service.
- Has on-going communication or interaction difficulties that impede the development of social relationships and cause substantial barriers to learn.
- Despite having received intervention, the child continues to fall behind the level of his peers.

School Request for Education Health and Care Plans

For a very few children, the help given by staff at Donhead with external specialist support is not enough to enable the child to make progress. Consultation with the Headmaster, SENDCo, the parents and any outside professionals, already involved, will then take place to consider whether a Local Education Authority (LEA) assessment may be appropriate. The SENDCo will support the Parents during this process. The LEA will be given information about the child's progress over time, and will also receive documentation in relation to the child's special educational needs and any other action taken to deal with those needs, including any resources or special arrangements put in place.

The evidence will include:

- Previous SMART targets for the pupil
- Wave 2 & 3 interventions records
- School reports
- Records of regular reviews and their outcomes, if applicable

- Records of the child's health and medical history where appropriate
- Attainment levels in literacy and numeracy
- Education and other assessments, for example from an advisory specialist support teacher or educational psychologist
- Views of the parents
- Attendance records

The parents of any child who is referred for an Education Health and Care (EHC) assessment will be kept fully informed of the progress of the referral. Progress of a child with an EHC plan will be reviewed annually. When this coincides with transfer to secondary school, the SENDCo from the secondary school will be informed of the outcome of the review.

SMART Plans for pupils on Wave 3

Strategies employed to enable the child to progress will be recorded within an Individual Learning Plan which will include information about:

- The short term SMART targets set for the child
- The teaching strategies to be used
- The provision to be put in place if appropriate
- How the targets will help the child in their learning
- The review dates
- The child's views will be sought and taken into account, as will those of the parents, whose support is vital if progress is to be achieved and maintained
- Teachers' feedback for each target

These are updated regularly by teachers and teaching assistants.

Provision:

The SEND department will also ensure that steps are taken to support these pupils. We provide the following:

- In-class support
- Fine Motor Skills Groups
- Emotional Literacy Assistant (ELSA) sessions
- 1:1/ small group sessions with focus on Literacy, Comprehension, Numeracy and Study Skills
- Smaller group teaching
- Ability setting in English and Maths when possible
- Smartmoves Motor Skills Group

Allocation of resources

The School Bursar and SENDCo is responsible for the operational management of the specified and agreed resourcing for special needs provision within the school, including the provision for children with EHC plans. The Headmaster informs the governing body of how the funding allocated to support special educational needs has been employed. The Headmaster and the SENDCo meet annually to agree on how to use funds directly related to EHC Plans.

Complaints Procedure

At Donhead we have a general complaints procedure. We recognise the Sensitive nature of SEND and therefore any concerns or complaints parents may have about SEND provision should initially be raised with the Form Teacher or a member of the SEND department. If the concern continues, the concern should be raised with the Headmaster who will

respond by meeting with parents to discuss the situation. If parents feel unhappy with the outcome, then the complaint should pass to the first level of our general complaints procedure.

Training for Staff in Special Educational Needs

At Donhead we encourage all Teachers and TAs to attend in service training on general issues. Training in the area of SEND is incorporated into the whole staff training.

The School has a NASEN membership with access to resources, information and training via webinars.

The SENDCo attends regular Inclusion Meetings and SENDCo Forums for EYFS at Merton Council and other relevant training.

Monitoring and evaluation

The SENDCo monitors the movement of children within the SEND system in school and provides staff and governors with regular summaries of the impact of the policy on the practice of the school. The SENDCo and the Headmaster hold regular meetings to review the work of the school in this area. In addition, the SENDCo and the named governor with responsibility for SEND also hold regular meetings each term.

For EYFS the SEND and Inclusion Practice Review for Private, Voluntary and Independent (PVI) Settings takes place annually.