



PUTNEY  
HIGH SCHOOL

GDST  
GIRLS' DAY SCHOOL TRUST

# **Learning Enrichment SEND Policy (Senior School)**

## Learning Enrichment SEND Policy

## Senior School

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## Learning Enrichment SEND Policy (Senior School)

### Statement of Values

An inclusive learning community where barriers to learning are removed not only enables pupils with special needs and disabilities to reach their full potential, achieve their personal best, make progress, feel valued and enjoy school; fostering a sense of inclusion benefits all pupils and prepares them to become compassionate leaders in their future careers. Consciousness of others' strengths and limitations, as well as sharing responsibility for removing barriers to participation, prepares pupils for the role of empathetic leaders.

Enabling all pupils to participate in the full range of school life and activities, and to succeed to their individual potential, forms the underlying principle upon which our provision of support for learning is based and is a core part of Putney High School and the GDST's values.

Our school is committed to creating a positive learning environment which promotes a belief in what may be possible and a view of ability that is flexible, not fixed. This whole-school ethos reflects the value we place on diversity and respect accorded to all individuals. Support for a variety of needs is a collective whole-school responsibility – all teachers are teachers of pupils with individual needs.

This policy operates within a wider national and local policy framework, which includes:

- The Education Act 1996
- The Equality Act 2010
- The Children and Families Act 2014, SEND Regulations 2014 and SEND Code of Practice 2015
- GDST Inclusion Policy
- Putney High School Access Arrangements Policy
- GDST Equal Opportunities (Education) Policy
- GDST Accessibility Strategy
- GDST and Putney High School's Admissions Policies
- GDST Exclusion Policy
- Putney High School Safeguarding and Child Protection Policy
- Putney High School Behaviour Policy
- Putney High School Anti-Bullying Policy
- Junior School Learning Enrichment SEND Policy

This policy and the school's Special Educational Needs and Disabilities (SEND) provision are informed by the SEN and Disability Code of Practice 2015. Where required (i.e., in the case of pupils with statements/EHC Plans), the school will have due regard to the Code.

The policy will be reviewed every year by the SENCO and Head, informed by consultation with other staff, parents and pupils. **Next review: September 2024**

## Aims and Objectives

The aims of this policy are that:

- The school will include and value each individual and their differences
- The school will ensure it is accessible and no pupil will be discriminated against
- Children and young people with SEND/ALN will engage in school activities alongside pupils who do not have SEND/ALN
- All pupils will have their needs identified in order to support progression and good mental health and wellbeing
- Every pupil will have access to a broad and balanced education
- Every pupil will participate in lessons fully and effectively
- Every pupil will experience success in their learning and achieve to the highest standard possible
- The school will promote positive outcomes in the wider areas of personal and social development

These aims will be achieved through the following objectives:

- Expecting all staff to promote equality, mutual respect and appreciation of diversity and difference through the curriculum, the PSHE programme, other school activities and their relationships with pupils, parents, other staff and members of the wider community; and to actively challenge barriers to inclusion such as discrimination, stereotyping, and indifference
- Ensuring that early identification, assessment, graduated provision and continuous monitoring is available for all pupils causing concern
- Ensuring all pupils with SEND/ALN are able to access the curriculum by providing differentiated teaching and learning opportunities, extra support or additional resources where appropriate in order to overcome barriers to learning
- Ensuring suitable pastoral care and support is available for all pupils so that they may develop in all areas and build a strong sense of self-esteem
- Ensuring support and regular professional development opportunities are available to enable staff to fulfil their responsibilities
- Involving pupils actively in the decision-making process regarding their education
- Working in partnership with parents/carers so that they can take an active role in their child's education
- Working with external specialists and outside agencies to meet the needs of individual pupils

## Implementation

### 1. Roles and Responsibilities

#### The role of the Head

The Head takes overall responsibility for the school's policies and procedures in relation to areas of SEND, ensuring that these accord with the principles and aims of the Trust's Inclusion Policy, and that all staff are aware of their responsibilities in this area.

#### The role of the Head of Learning Enrichment (SENCO)

#### The SENCO at Putney High School is Raazia Baggia

The SENCO is responsible for the day to day implementation of the SEND policy and managing provision. This will encompass:

- Overseeing identification, referral and assessment of additional needs;
- Developing and coordinating support systems;
- Managing other staff in the learning support team;
- Managing the budget and other resources;
- Maintaining records and ensuring relevant information is communicated to other staff, particularly at transition points;
- Tracking and monitoring pupil progress;
- Advising and supporting non specialist staff, and contributing to INSET;
- Working with the Examinations Officer to ensure appropriate access arrangements are in place for external assessment;
- Working with parents;
- Liaising with external agencies;
- Monitoring and evaluating the impact of policy and provision;
- Keeping up to date with relevant legislation, research and current good practice, and revising policies and procedures as necessary;
- Working closely with the Head and SLT to advise on policy development and relevant aspects of whole school planning.

## The Role of the Learning Enrichment Department

The Learning Enrichment department consists of two teachers, three Teaching Assistants and the Head of Learning Enrichment (SENCo). The Learning Enrichment department supports the teaching of study and revision skills by offering year group specific lunchtime workshops to groups of pupils covering key areas of their learning, e.g., memory and revision strategies, spelling strategies, organization and essay writing skills. Private tuition may be advised to enable pupils to develop strategies to overcome their difficulties. Parents meet the costs. Some 1:1 support for pupils with SEND & ALN is available in school from the Learning Enrichment Department teachers within the constraints of available resources. Priority is given to pupils on the SEND register. Pupils in Years 7,8 & 9 may be withdrawn from lessons for 1:1 teaching from the Learning Enrichment teachers. Pupils in Years 10 & 11 will be offered lessons at lunchtime or – on occasion – short sessions of up to 15 minutes during lessons. Pupils in Years 12 & 13 will be offered lessons in their free periods.

The LE department reviews the SEND register on a regular basis, liaising with pupils, Heads of the Year, Heads of Department, teachers and parents, with the aim of ensuring appropriate provision to raise the student outcomes. The SEND register will reflect the needs and provision of the pupils which will be reviewed by the SENCO in conjunction with the Head of Year every half-term or sooner, if required.

## The role of Heads of the Year/Heads of Department/Subject Coordinators

Subject leaders are expected to oversee, and monitor SEND provision within their particular remit. This will involve:

- Ensuring schemes of work include adjustments for SEND/ALN and are free from discrimination or bias
- Utilise the graduated approach of assess-plan-do-review to ensure that appropriate provision is in place for the SEND pupils
- Ensuring opportunities are open equally to pupils with and without SEND/ALN
- Using QTL procedures (classroom observation, work scrutiny etc.) to ensure effective differentiation is in place and to review and improve practice
- Keeping up to date with new approaches/resources which may be particularly appropriate for pupils with SEND/ALN in their subject area
- Ensuring inclusion is a regular item on department/subject meeting agendas
- Maintaining and updating the departmental accessibility plan
- Regular meeting with each Head of the Year to review SEND pupil progress and pupil provision

## The Role of other Teaching and Support Staff

All teaching and support staff are expected to provide for diverse pupils' needs, maximising their access to the whole educational offer, and enabling them to succeed. This will involve:

- Being involved in the development of the school's policies relevant to inclusion and fully aware of the procedures for identifying, assessing and making provision for pupils with SEND/ALN
- Being aware of which pupils in the school have SEND/ALN by referring to the SEND register.
- Having a clear understanding of the physical, social and intellectual development of children at different stages and the needs of all pupils, including those with SEND/ALN, and being able to personalise their approach using methods of adaptive teaching and personalised recommendations detailed in Educational Psychologist report, if applicable, in order to overcome barriers to learning and engage and support them
- As practitioners responsible and accountable for the progress and development of the pupils in their class, planning and delivering an individualised programme using individual learning plans if needed and differentiating their teaching and resources to take account of the different abilities and preferences of individuals, adopting an increasingly personalised approach to support where required in response to successive cycles of planning and review.
- School staff will refer to the SEND pupil profiles or Educational Psychologist summaries to adapt their approach for the pupils.
- Assessing and monitoring the progress of pupils with SEND/ALN and recording and reporting relevant information
- Developing constructive relationships with parents and including their voice, where appropriate
- Liaising with the SENCO about support and progress
- Delivering strategies suggested in the Learning Plan for the SEND pupils and supporting LE department to review the targets

## Communication and Coordination

Termly letter is sent to all parents to inform them about upcoming Learning Enrichment events and support available. Parents are encouraged to contact the Head of Learning Enrichment with any queries or suggestions. The Head of Learning Enrichment is available to meet parents during Progress Evenings to discuss support for their daughter. Meetings can also be arranged when there is a concern about progress of a student with SEND or teachers are concerned that a student may have a SEND that has not been previously diagnosed. Parents are encouraged to contact the Head of Learning Enrichment with any queries or suggestions.

## 2. Admissions

### Equal Opportunities

The GDST is committed to equal opportunities in education and will not unlawfully discriminate against, or treat less favourably any pupil at, or applicant to, its schools on the grounds of race, disability, sexual orientation, religion or belief (or lack thereof), gender reassignment, sexual orientation, or pregnancy or maternity ('protected characteristics'). The Trust will also not discriminate against, or treat less favourably, any pupil at, or applicant to, its schools because they are perceived to have one of the protected characteristics or are associated with someone who has a protected characteristic.

### Admissions Policy

The school's admissions policy can be found on the school website.

### Admissions Arrangements

Putney High School is an academically selective school, and admission is dependent upon reaching the required academic standard. Prospective pupils with SEND will be admitted on the same basis, unless the school cannot reasonably make the adjustments required to cater for their needs.

Parents of children with SEND applying for a place at the school are invited to discuss the child's needs with the SENCO at an early stage, and the school may also contact the child's current school to gain further information. Each pupil is looked at as an individual case to see whether the school can effectively meet their needs. Every effort is made to accommodate a pupil's needs where possible, including in arrangements for entrance tests.

The school may charge for certain forms of additional provision for pupils with SEN. Further information on charges can be obtained from the school on request.

In accordance with the Equality Act 2010, the school will make reasonable adjustments in line with JCQ guidelines (without charge) to its provision to ensure that pupils with disabilities are not put at a substantial disadvantage to their peers. The nature of these adjustments will be determined in consultation with the child and parents.



## Pupils with an EHC Plan/Statement

The school can be named by the Local Authority (LA) in an EHC Plan/statement with the school's agreement. Whether the school is named or not, a place will only be offered by the school once it is established that the school can support the provision specified on the statement /EHC Plan.

## 3. Identification and Assessment

### Definitions

**Disability** is defined under the Equality Act 2010. A person has a disability if s/he "has a physical or mental impairment that has a substantial and long-term adverse effect on his or her ability to carry out normal day-to-day activities."

**Special Educational Needs (SEN)** are defined in the Children and Families Act 2014:

- 20.1 A child or young person has special educational needs if he or she has a learning difficulty or disability which calls for special educational provision to be made for him or her.
- 20.2 A child of compulsory school age or young person has a learning difficulty or disability if he or she:
  - (a) has a significantly greater difficulty in learning than the majority of others of the same age, or
  - (b) 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

Additional Learning Needs (ALN) is the designation used by the school for pupils who do not have SEN as defined by the act but are nevertheless hindered in accessing the full curriculum and fulfilling their potential without tailored recognition of their needs and individual provision.

Pupils may have either a disability or SEN/ALN or both. Not every pupil with SEN will qualify as disabled under the statutory definition; this will depend on the severity or extent of her needs.

Children may have a disability/SEN/ALN either throughout or at any time during their school career and may have SEN/ALN in one or more areas of the curriculum.

Slow progress and low attainment do not necessarily mean that a child has SEN/ALN. However, they may be an indicator of a range of learning difficulties or disabilities. Equally, it should not be assumed that attainment in line with chronological age means that there is no learning difficulty or disability. Some learning difficulties and disabilities occur across the range of cognitive ability and left unaddressed, may lead to frustration, which may manifest itself as disaffection, emotional or behavioral difficulties.

Children are not regarded as having a learning difficulty solely because the language or form of language of their home is different from the language in which they will be taught. These children however are likely to have additional needs of a different kind and may well receive learning support for their language development.

### **The Four Areas of Need**

The SEN Code of Practice outlines four broad areas of need which can help with identification:

#### **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 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 Difficulties**

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

behavior. 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.

### **Sensory and/or Physical Needs**

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

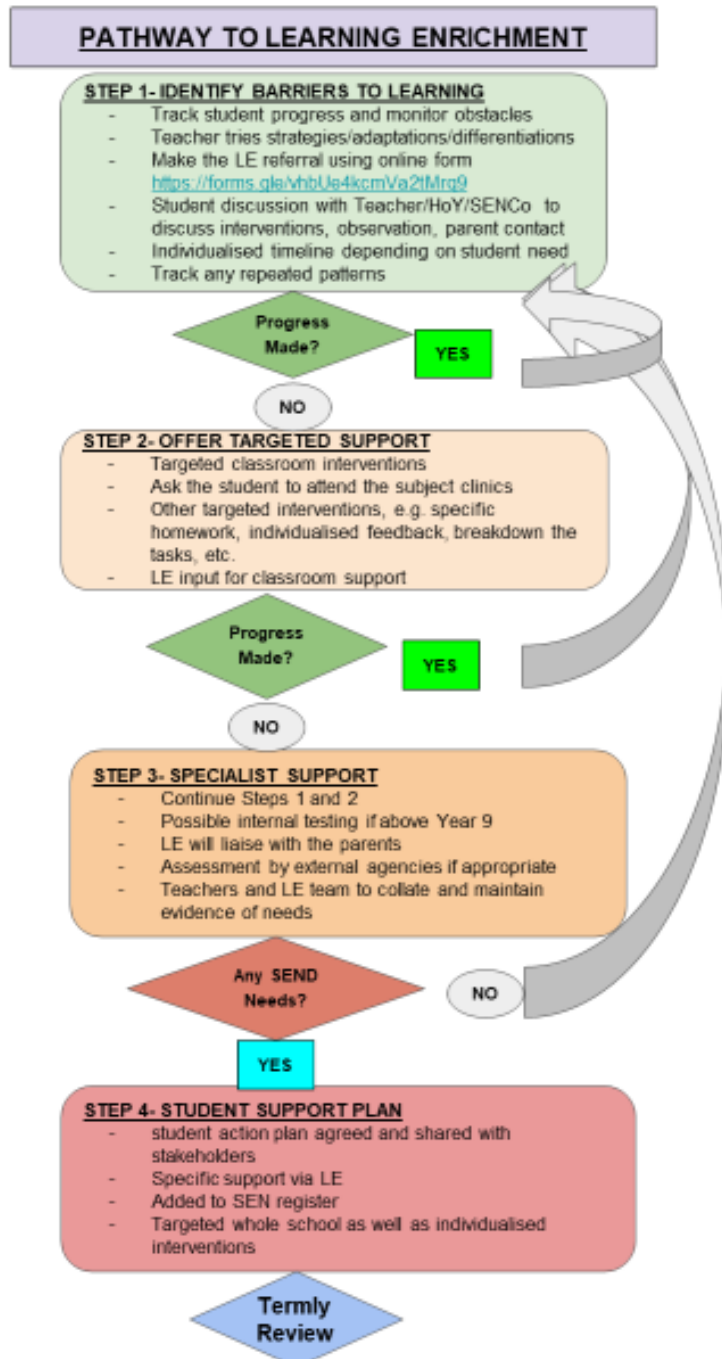
fluctuate over time. Many children and young people with vision impairment (VI), hearing impairment (HI) or a multi-sensory impairment (MSI) will require specialist support and/or equipment to access their learning, or habilitation support. Children and young people with an MSI have a combination of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

Needs may cut across some or all of these areas and may change over time. Any assessment should ensure that the full range of a pupil's needs is identified, not simply the primary need.

## Routes to Identification

Graduated approach to identify and meet the needs of the pupils.



The school recognises the importance of early identification of any learning needs, and the risk of learning difficulties and the possible consequences such as loss of self-esteem and frustration in learning. Early identification is a whole school responsibility.

The school uses a number of approaches to identify SEND/ALN:

- Identification at admission: through communication with parents, any previous school, and use of the admission questionnaire.
- Identification through data tracking and screening: Lucid Exact screening in Year 7 and further screening of individual pupils' speed of processing, reading and/or handwriting if a concern arises at any point during their time at Putney High School.
- Identification through staff concern: class and subject teachers make regular assessments of progress for their pupils. Where pupils make less than expected progress given their age and individual circumstances, the first response is to take a **graduated approach** to personalising learning in order to target areas of weakness. Where progress continues to be less than expected the class or subject teacher will work with the SENCO to assess the pupil.
- School staff are required to fill in the Learning Enrichment referral form that will aid in assessing the needs of the pupils. Following the referral, concerned teaching staff will be requested to provide further information by providing their feedback or assessing the needs of the pupils.
- Identification through pupil/parent concern: the school recognises that parents and the pupils themselves have a unique perspective on their learning. Class and subject teachers are expected to listen to and address any concerns raised by parents and pupils. The first response should be to adopt the graduated approach as detailed above, moving to involvement with the SENCO if difficulties persist.
- Emotional, social and mental health difficulties are likely to be identified and addressed through the school's pastoral system – tutors, year group heads, school nurse and counsellor. All staff should be alert to changes in attitude and behaviour which may indicate such difficulties and involve pastoral staff and the SENCO as appropriate. Where difficulties are long-lasting or severe the school will consider whether the pupil might have SEND and require additional support. Where a pupil is identified as having SEND, parents will be notified.

#### 4. Provision

Putney High School works on the principle that differentiated high quality teaching is an expectation for all pupils, including those with SEND/ALN, and this will ensure that the majority will be engaged in their learning and achieve their potential. All our teachers are responsible for planning and delivering an individualised programme, personalising their teaching and providing constructive formative feedback to take account of the different learning styles, abilities and preferences of individual pupils.

The first level of support for pupils experiencing difficulties takes a **graduated approach** in the form of a four-part cycle in which the class or subject teacher **assesses** the pupil's needs

drawing on a range of evidence, **plans** appropriate differentiation or interventions, **puts these into practice** and **reviews** the outcome.

The school provides regular staff training to ensure teachers and support staff have the knowledge and skills to work effectively with pupils with SEND/ALN. SEND training is part of the school's induction and appraisal procedures, and the SENCO is regularly available to provide advice. Information/guidance about types of special needs and practical advice on teaching strategies can be found on the Shared Area in the Learning Enrichment section as well as the LEARNING ENRICHMENT TEAMS channel

Following cycles of the graduated approach, if a pupil continues to fail to make the expected progress, the SENCO will be involved to assess the pupil. The outcomes of this assessment will dictate the nature of further support. The SENCO will determine a personalised programme for the individual pupil, which may involve:

- Further differentiation in the classroom, supported and directed by the SENCO
- Individualised outcomes-focused target setting
- Access to specific resources – equipment, software programmes etc.
- Additional specialist teaching
- Pastoral support
- Referral to external specialists

Provision will be made in consultation with the pupil and parents, and progress will be reviewed regularly in order to inform future support

The provision will be encapsulated in the Learning Plan for the student which will be reviewed on termly basis by the teachers/support staff/LE team.

### Public Examinations and Access Arrangements

- Recommendations for exam access arrangements will be based on the current JCQ criteria and the SENCO will liaise with parents, pupils and the exams officer as to appropriate arrangements
- The SENCO will complete a Form 8 Sections 1 and 3 and the specialist assessor or educational psychologist will complete Section 2 and, with the exams officer, the student will be entered using the JCQ online application system
- Parents have the right to seek a diagnostic assessment for their child. However, the organisation or individual performing the assessment **must have prior contact** with the school to gather background information on the pupil before going ahead with the assessment. A privately commissioned assessment carried out without prior consultation with the centre cannot be used to award access arrangements, and external assessors must have a thorough and up to date understanding of the JCQ regulations
- For pupils seeking accommodations on medical grounds, parents are required to provide recent medical consultant's letter for medical condition or diagnosis.

- Teachers will supply the SENCO with evidence of need so that a substantial and clear picture of this being a student's normal way of working can be built up
- Pupils requiring the use of a word processor in public examinations must demonstrate that this is their normal method of producing work in lessons and the school must hold evidence demonstrating the reasons for the award of the use of a word processor
- Pupils in KS3 who may require access arrangements in future will be monitored and extra time awarded will be on a needs basis, subject by subject whilst in KS3

More detailed information can be found in the school's Access Arrangements Policy #355

### **Provision for Pupils with EHC Plans/Statements**

Provision for pupils with EHC Plans/Statements will be made with due regard to the SEN Code of Practice. The school will co-operate with the LA and parents to work towards the provision set out in the EHC Plan/statement, and to review the plan as required.

### **Record Keeping**

The SENCO maintains registers of pupils identified as having SEN and ALN. These lists are regularly updated and available to staff.

Records are kept on all pupils on the SEN/ALN registers and on the shared area and Learning Enrichment TEAMS channel and updated regularly. These will include:

- Details of any assessments
- Details of any observations from staff
- Notes on provision and updates to provision
- Information from monitoring procedures
- Communication with and reports from external agencies
- Notes on communications with parents
- Pupil profile
- Educational psychologist reports and summaries
- Learning plan for the student

Relevant information is made available to staff via SEND/ALN registers available on the Shared Area.

Confidential records are stored securely in accordance with data protection regulations.

### **Provision for Disabilities**

The school has an accessibility plan to improve over time its accessibility to existing and prospective pupils with disabilities. Where provision for specific disabilities is not already in place, the school will work with individual pupils and their parents to determine appropriate support.



## Evaluating the Success of Provision

The effectiveness of the school's provision is evaluated both qualitatively and quantitatively.

Qualitative data will be gathered through pupil and parent view on the success of the provision and providing the high-quality outcomes for the pupils.

Quantitative data will evaluate the progress of the SEND pupils in comparison to the rest of the school cohort.

Following measures will be utilised to analyse the success of the provision regularly:

- Regular review of the progress and achievement of the SEN/ALN cohort in comparison to the cohort as a whole during progress review meetings
- Periodic consultation with pupil and parent focus groups
- The outcomes of external inspection
- Regular meetings with each Head of the Year
- Capturing student voice through pupil surveys and pupil view at the end of intervention sessions.

LE team will ensure that they are aware of SEND updates and government policies. They will seek to inform and improve their practice using recent research, feedback from the parents, pupils and teachers.

## 5. SEND, Pastoral Care and Safeguarding

Pupils with SEND are statistically more vulnerable to peer-on-peer and other forms of abuse. School staff are alert to the additional challenges children with SEND may face, and the barriers that can exist when recognising abuse and neglect in this group of children.

These barriers may include:

- Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further explanation
- Being more prone to group isolation than other children
- The potential for children with SEND to be disproportionately impacted by behaviours such as bullying, without outwardly showing any signs, and
- Communication barriers and difficulties in overcoming these barriers

Safeguarding children and young people with SEND require understanding, foresight, reflection, and communication. Staff are trained to recognise and respond to the pastoral needs of pupils with SEND, and school policies such as the Safeguarding, Behaviour and Anti-Bullying Policies take these into account. The SENCO liaises regularly with the DSL, Heads of Year, and other staff with pastoral responsibilities.

The Learning Enrichment Department will work holistically with the Pastoral team to ensure overall well-being of the SEND pupils.



The Learning Enrichment team will work alongside Pastoral team to enhance their emotional resilience and social skills through small group interventions targeted to support specific pupils or groups.

### **Working with Pupils and Parents**

#### **Pupils**

At Putney High School, our ethos, organisation and culture support pupil participation, and encourages pupils to take responsibility for their own learning. We promote student voice through the Student Council, adopt student-centered pedagogies such as assessment for learning, and encourage the use of pupil feedback in staff performance management.

We recognise that children with SEND/ALN have a unique knowledge of their own needs and circumstances. The school will seek their views and include them in the decision-making processes that affect their education – from identification to assessment, decisions on provision and reviewing progress and the success of interventions.

#### **Parents**

The relationship between the school and parents has a crucial bearing on the progress of pupils, particularly those with SEND/ALN. We actively seek to work with parents as partners and value their contribution. Teachers, SENCOs, pastoral and other staff all have an important role in developing positive and constructive relationships with parents.

- The SEND Policy is available on the school's website and parents are welcome to comment on SEND/ALN provision at any time
- The school offers parents information evenings, including sessions which specifically address how to support their child academically and emotionally
- The school seeks to engage parents of pupils with SEND/ALN at an early stage – ideally prior to admission – in order to get a full picture of the pupil's needs and make suitable provision
- Parents of pupils identified as having SEN will be informed immediately
- Decisions regarding provision, monitoring and review will be made in consultation with parents. Parents of pupils with SEN/ALN will be invited to a meeting with teachers and the SENCO during Progress Evenings at least once a year to discuss provision and progress – although informal contact is likely to be more frequent than this

#### **Complaints**

The school aims to work, wherever possible, in partnership with parents to ensure a collaborative approach to meeting pupils' needs. All complaints are taken seriously and are heard through the GDST's Complaints Procedure.

## **6. Links Beyond the School**

Putney High School is committed to work in partnership with external services to ensure the best outcomes for pupils with SEND. For pupils with an EHC Plan/statement, we will co-operate with the Local Authority to work towards the provision specified on the plan, and to review the plan as required.

The school also works with a range of local therapists, SEND specialists and external organisations.

Services may also be accessed directly by parents. The Local Offer – information on services across education, health and social care available in the area and how to access them – can be found at <https://thrive.wandsworth.gov.uk/kb5/wandsworth/fsd/localoffer.page>

Putney High School also has established links with other schools and institutions for the purpose of sharing good practice. This includes the GDST SEND network, Connections in Mind foundation, Fairley House School, Bloomfield Learning Centre, the Linden Lodge and UCL IoE.

### **Related policies and other documents**

- Access Arrangement Policy
- Accessibility Plan
- Accessibility Policy
- Admissions Policy
- Entrance Exams SEND Policy