

Programme Audit/Major Modification report

Programme provider:	Anglia Ruskin University
In partnership with: (Associated practice placement providers involved in the delivery of the programme)	East Suffolk North Essex NHS Foundation Trust Princess Alexandra Hospital NHS Trust Mid Essex NHS Foundation Trust Basildon and Thurrock NHS Foundation Trust Southend University Hospital NHS Trust North West Anglia NHS Foundation Trust Queen Elizabeth Hospital Kings Lynn NHS Trust Cambridge University Hospitals NHS Foundation Trust
Date of review:	01 Jul 2019
Type of Modification	Desktop
Provision reviewed:	Registered Midwife - 36M
Title of current programme:	BSc (Hons) Midwifery
Title of modified programme if changed:	
Academic level of current programme:	England, Wales, Northern Ireland <input type="checkbox"/> Level 5 <input checked="" type="checkbox"/> Level 6 <input type="checkbox"/> Level 7 SCQF <input type="checkbox"/> Level 8 <input type="checkbox"/> Level 9 <input type="checkbox"/> Level 10 <input type="checkbox"/> Level 11
Academic level of modified programme if changed:	England, Wales, Northern Ireland <input type="checkbox"/> Level 5 <input type="checkbox"/> Level 6 <input type="checkbox"/> Level 7 SCQF <input type="checkbox"/> Level 8 <input type="checkbox"/> Level 9 <input type="checkbox"/> Level 10 <input type="checkbox"/> Level 11

Reviewer:	Hilary Lumsden

Outcome of Approval Panel Meeting	
Outcome:	Recommended for approval
Conditions and NMC standard(s)/requirement(s) they relate to:	<p>Resources None identified</p> <p>Admission and progression None identified</p> <p>Practice learning None identified</p> <p>Fitness for practice None identified</p> <p>Quality assurance None identified</p>
Date conditions to be met:	
Recommendations and NMC standard(s)/requirement(s) they relate to: Note: recommendations will be assessed through the AEI annual self-assessment report	None identified
Date conditions met:	
Programme start date:	16 Sep 2019

Summary

Summary of modification request

Anglia Ruskin University (ARU) is an established approved education institution (AEI). ARU delivers the pre-registration BSc (Hons) midwifery programme which was approved on 20 January 2014 against the Standards for pre-registration midwifery education (NMC, 2009).

ARU presented documentation for approval of a modification to the programme to transfer students from the Standards to support learning and assessment in practice (SLAiP) (NMC, 2008) to the Standards for student supervision and assessment (SSSA) (NMC, 2018).

Documentary analysis and a teleconference with representatives from the programme team on 1 July 2019 confirmed evidence of consultation and collaborative planning of the SSSA implementation and transfer of students with practice learning partners (PLPs) and student midwives.

Transfer of new students to the SSSA is due to commence from 16 September 2019. The September 2017 and September 2018 cohorts will transfer from 30 September 2019.

The major modification to the programme is recommended to the NMC for approval.

Feedback from key stakeholders

Presenting Team

A teleconference was held with representatives from the programme team on 1 July 2019 which included the lead midwife for education (LME), the head of practice learning, the course leader for Chelmsford and the course leader for Cambridge. The programme team clarified points raised in the documentary review.

Mentors, sign-off mentors, practice teachers and employers

There has been full consultation with heads of midwifery and PLPs about the transfer of midwifery students as part of the local SSSA implementation plan.

Students

Students were involved in the planning of the transfer of students to the SSSA. There are SSSA champions in each cohort student group. SSSA champions are involved in disseminating information to their peer groups. Student representatives are involved in student staff liaison committees where the proposed SSSA implementation arrangements are discussed.

Service users and carers

Not required as this was a desktop review.

Examples of notable and innovative practice and standards they relate to

None identified

Potential risks to compliance of education standards and standards they relate to

None identified

Potential risks to the student learning environment and standards they relate to

None identified

Any other risks to public protection

None identified

Areas for future monitoring

None identified

Outcome recommendation

The major modification is recommended to the NMC for approval.

NMC Standards

Please refer to the [Standards for Pre-Registration Midwifery Education \(NMC, 2009\)](#), current programme specific circulars accessed via the [NMC Website](#), EU Directive 2005/36/EC Article 41 (1) and Article 31 (6-7), and Section one of the Mott MacDonald [QA Handbook](#).

Standards for the lead midwife for education

Standard 1: Appointment of the lead midwife for education

The NMC requires an approved educational institution (AEI) to do the following:

Appoint a lead midwife for education (LME) who is a practising midwife and has a recorded midwifery teaching qualification on the NMC register.

Confirm the appointment of an LME with the NMC

Use the LME for strategic liaison with external agencies such as purchasers of education provision for all matters affecting midwifery education.

What we found:

Standard one is unchanged since original approval on 20 January 2014.

Outcome:	Standard met
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Date standards met:	
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Revised outcome:	
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Standard 2: Development, delivery and management of midwifery education programmes	
The LME shall lead the development, delivery and management of the midwifery education programmes provided by the AEI, ensuring that they comply with the standards established by the NMC.	
What we found:	
<p>The LME has led the development of the modification to the original approval of the midwifery programme to ensure compliance with SSSA.</p> <p>Partnership meetings with the LME for the AEI have taken place. Proposed changes to the programme ensure the quality of the student experience is enhanced for midwifery students. Service leads and practitioners from all trusts have been involved in the development and introduction of the SSSA. This collaboration has extended to all heads of midwifery within all PLPs.</p>	
Outcome:	Standard met
Date standards met:	
Revised outcome:	

Standard 3: Signing the supporting declaration of good health and good character	
In accordance with rule 6(1)(a)(ii) of the registration rules, the LME shall be responsible, at her discretion, for signing the supporting declarations of good health and good character for all midwifery applications to the register.	
What we found:	
Standard three is unchanged since original approval on 20 January 2014.	

Outcome:	Standard met
Date standards met:	
Revised outcome:	

<p>Standards for admission to, and continued participation in, pre-registration midwifery programmes</p> <p>Age of entry</p> <p>St. 4</p> <p>General requirements</p> <p>The following requirements for selection should be read and operated alongside programme providers' existing policies and procedures:</p> <p>4.1 Selection</p> <p>Wherever practicable, the selection process should include a face-to-face meeting.</p> <p>Programme providers (AEIs and their service partners) are encourage, wherever possible, to involve lay people and midwifery students in the selection process. Depending on local circumstances they may be involved directly or indirectly in selection.</p> <p>All individuals in the selection process should receive appropriate training, preparation and updating which includes equality and diversity.</p> <p>Representatives of partner service provider organisations should be directly involved in the selection process.</p> <p>The views of the individuals directly involved in selecting applicants should be taken into account when making final decisions on whether to accept or reject an applicant.</p> <p>4.2 Literacy and numeracy</p>

AEIs are required to ensure that applicants for pre-registration midwifery education programmes have provided evidence of literacy and numeracy that includes prior achievement of basic skills sufficient to undertake a pre-registration midwifery programme of education to a satisfactory level of attainment.

4.3 Good health and good character

Applicants must demonstrate that they have good health and good character sufficient for safe and effective practice as a midwife, on entry to, and for continued participation in, programmes leading to registration with the NMC.

Applicants from overseas must meet the good health and good character as defined for UK applicants and additionally those requirements set out by the UK government for healthcare workers from overseas

4.4 Entry to the register

The NMC requires a self-declaration of good health and good character from all those entering the register for the first time. On completion of the midwifery programme the student will submit this self declaration. The declaration is either supported by the LME, whose name has been notified to the Council and who is responsible for midwifery education in the relevant AEI, or by her designated registered midwife substitute. AEIs must be able to provide evidence of having fulfilled this requirement.

What we found:

Standard four is unchanged since original approval on 20 January 2014.

Outcome:

Standard met

Date standards met:

Revised outcome:

Standard 5: Interruptions to pre-registration midwifery education programmes

<p>Programme providers must ensure that they have in place processes to manage interruptions to the study of programmes for whatever reason.</p> <p>When a student returns to a programme it is recommended they have a period of orientation appropriate to the length of interruption. Programme providers must ensure that the student's acquired knowledge and skills remain valid, enabling them to achieve the necessary standards required on completion of the course.</p>	
What we found:	
Standard five is unchanged since original approval on 20 January 2014.	
Outcome:	Standard met
Date standards met:	
Revised outcome:	

Standard 6: Admission with advanced standing	
<p>All applicants, other than those registered as a nurse level one (adult), must complete a minimum three years full-time pre-registration midwifery programme of education.</p> <p>Where a student is already registered with the NMC as a nurse level one (adult), the length of the pre-registration midwifery education programme shall be no less than 18 months full time.</p>	
What we found:	
Standard six is unchanged since original approval on 20 January 2014.	
Outcome:	Standard met

Date standards met:	
Revised outcome:	

Standard 7: Transfer between approved educational institutions	
It is the responsibility of AElS to decide whether or not to accept an application for transfer.	
What we found:	
Standard seven is unchanged since original approval on 20 January 2014.	
Outcome:	Standard met
Date standards met:	
Revised outcome:	

Standard 8: Stepping off and stepping on to pre-registration midwifery education programmes	
Students can 'step off' a pre-registration midwifery programme of education.	
What we found:	
Standard eight is unchanged since original approval on 20 January 2014.	
Outcome:	Standard met

Date standards met:	
Revised outcome:	

Standards for the structure and nature of pre-registration midwifery programmes	
Standard 9: Academic standard of programme	
<p>Since September 2008 the minimum academic level for entry to the midwives' part of the register for those entering pre-registration midwifery programmes is degree level (NMC Circular 14/2007).</p> <p>Scotland – 360 academic credits, 60 of which must be at level nine.</p> <p>England, Wales and Northern Ireland – 300 academic credits, 60 of which must be at level H.</p>	
What we found:	
Standard nine is unchanged since original approval on 20 January 2014.	
Outcome:	Standard met
Date standards met:	
Revised outcome:	

Standard 10: Length of programme	
<p>Article 31(6-7) of EU Directive 2005/36/EC now describes the length of midwifery programmes in years, months and hours.</p> <p>The length of a pre-registration midwifery programme of education should be no less than three years (equivalent to 156 weeks full time) and each year shall contain 45 programmed weeks.</p> <p>Three year direct entry programme – 4,600 hours (minimum requirement)</p> <p>Where the student is already registered with the NMC as a nurse level one (adult), the length of the pre-registration midwifery programme of education shall not be less than 18 months (equivalent to 78 weeks full time).</p> <p>Eighteen month midwifery programme (following qualification as an adult nurse) – 3,000 hours (minimum requirement).</p>	
What we found:	
Standard 10 is unchanged since original approval on 20 January 2014.	
Outcome:	Standard met
Date standards met:	
Revised outcome:	

Standard 11: Student support	
<p>Midwife teachers and midwife mentors must meet the NMC's standards to support learning and assessment in practice.</p>	
What we found:	
<p>Discussion with the programme team and documentary evidence confirms that students have been consulted and actively engaged in the planning and</p>	

implementation of the SSSA as well as practice education leads. Newsletters and minutes of student forums and midwifery forums evidence examples of ongoing communication with students and midwives about the changes.

There's clear evidence that students are appropriately supported in practice learning environments and comply with the SSSA. Student facing documentation and handbooks for practice supervisors and assessors details the range of support and the roles and responsibilities of the practice supervisor, practice assessor and academic assessor in student supervision and assessment.

The AEI has a tier of support, namely, education champions who are the key educationalists that link with the PLP organisations. The education champion's role description includes supporting undergraduate midwifery, nursing and nursing associate students. They are ambassadors for the university within the practice settings. Education champions have several responsibilities including; auditing the clinical placement area; organising student forums; liaising with the education lead in practice and monitor student support in practice. The education champion will address any concerns students may have regarding the practice learning environment.

The education champion will liaise with academic assessor/link teacher when concerns are raised by practice supervisors and practice assessors regarding student performance as evidenced in the practice assessment document (PAD). The education champion will ensure that the academic assessor or link teacher visits the student in practice promptly to discuss practice concerns. Escalation of concerns regarding student performance is via the LME or course lead and is evidenced in the academic assessor role description.

The AEI have another level of support for student midwives who are midwifery link teachers. The link teacher is responsible to the education champion in communicating the student practice experience and as midwives link teachers report to the LME regarding practice link visits. Midwifery link teachers support student midwives in the practice area and act also as a link between student, practice supervisor and practice assessor.

All students will have a named midwife who is a practice supervisor in each practice learning setting allocated by the midwifery practice learning coordinator. The practice supervisor will oversee the student in practice to ensure safe, effective learning. The practice supervisor role and responsibilities are clearly documented in student-facing documentation and the practice supervisor role description.

The practice supervisor acts as a role model to students and supports and

supervises students, providing feedback to the student and practice assessor.

Practice supervisors are prepared for the role via an online portal provided by the AEI. In addition, midwifery link teachers have been preparing current mentors for their new role of practice supervisor on a monthly basis in each trust, this support will continue on a yearly basis once initial preparation has been completed. PLPs have also been providing additional workshops for practice supervisors to attend to update practice supervisors on the SSSA standards and roles. There are also posters displayed in practice learning environments to inform practice supervisors of their new role.

Each student midwife will have a named practice assessor allocated to them by the midwifery practice learning coordinator in each practice learning experience area who will ensure that practice assessors are not allocated to the same student in different parts of the programme. The practice assessor will be responsible for the support and assessment of student midwives at two summative points in the academic year. The practice assessor will liaise closely with the practice supervisor, the link teacher and academic assessor regarding student performance and achievement.

Practice assessors are prepared via the AEI's online portal and through workshops in the trust. Midwifery teachers have been preparing practice assessors for their new role on a monthly basis in current mentor workshops. Posters have been displayed in practice learning environments regarding the changing role of the practice assessor. Ongoing support to practice assessors is given through the network of link teachers, academic assessors and education champions who visit practice learning areas regularly. Yearly practice assessor workshops will be conducted by a member of the midwifery teaching team to update and support practice assessors in their role.

The role of the academic assessor is clearly evidenced in the role description. The requirements to be an academic assessor are to be a registered midwife and to hold a recognised teaching qualification. They are prepared for their role by a university led one-day workshop. Students are allocated to their academic assessor by the LME who will ensure that a different academic assessor is allocated for each part of the programme. Academic assessors will have the responsibility to check that they have not been allocated the same student in consecutive parts of the programme as evidenced in the academic role description. Ongoing support and development of the academic assessor role is via the university online platform and is accounted for in the academic workload allocation.

The existing mentor register will become a live register of practice assessors and

<p>practice supervisors. There's agreement with PLPs that they will continue to maintain the register which is a valuable source of evidence of assessor and supervisor capacity.</p> <p>There are well embedded processes for the quality monitoring of practice learning environments through effective partnership working between the AEI and PLPs. These monitoring processes including regular educational audit, student evaluations and practice learning capacity planning which are overseen by the partnership groups such as the practice education committees (PECs), the practice education group (PEG) and quality learning environment group (QLEG). These monitoring processes ensure compliance with the SSSA.</p>	
Outcome:	Standard met
Date standards met:	
Revised outcome:	

Standard 12: Balance between clinical practice and theory	
<p>Since September 2008, the practice to theory ratio of each programme is required to be no less than 50 percent practice and no less than 40 percent theory.</p>	
What we found:	
Standard 12 unchanged since original approval on 20 January 2014.	
Outcome:	Standard met
Date standards met:	
Revised outcome:	

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Standard 13: Scope of practice experience	
Where the opportunity is available, students should be involved in supporting women birthing in a variety of settings.	
Student midwives must be involved in the care of a small group of women throughout their childbirth experience, including antenatal, intrapartum and postnatal care.	
What we found:	
The programme team discussion and documentation provided evidence that there's no change to the practice learning experiences in the programme.	
Student midwives are expected to follow a small caseload of approximately five women through the midwifery programme with the support of community midwives. There are sufficient opportunities in all PLP maternity provider trusts for students to gain the appropriate number of women to caseload. The women in the caseload provide feedback about their care to the student midwife which is documented in the student's red book.	
Outcome:	Standard met
Date standards met:	
Revised outcome:	

Standard 14: Supernumerary status during clinical placement
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Students undertaking pre-registration midwifery education programmes cannot be employed to provide midwifery care during their training – all clinical experience should be education-led with students having supernumerary status for the duration.	
What we found:	
Standard 14 is unchanged since original approval on 20 January 2014.	
Outcome:	Standard met
Date standards met:	
Revised outcome:	

Standard 15: Assessment strategy
<p>Clinical practice must be graded and be counted as part of the academic award.</p> <p>All outcomes within a progression point period (for example an academic year) have to be achieved and confirmed within 12 weeks of entering the next academic level. All assessments must be completed and have been passed prior to successful completion of the programme.</p> <p>A student midwife shall achieve these standards under the supervision of a sign-off mentor.</p>
What we found:
<p>Discussion with the programme team and documentation provided evidence that the modification to the SSSA (NMC, 2018) has been clearly planned and organised.</p> <p>The programme team discussion and documentation clarified the assessment strategy and the ongoing support students receive in practice learning environments.</p> <p>The programme student handbook and PAD provide clear evidence of how the SSSA requirements have been applied to the assessment and supervision of</p>

students' practice learning.

There's no change to the assessment of student proficiency, essential skills clusters and requirements of the EU directives which are recorded in the PAD. However, the PAD has been modified to incorporate the new roles of practice supervisor, practice assessor and academic assessor. aligning with the SSSA requirements.

The practice supervisor contributes to the assessment process through the provision of continuous feedback to the student and engagement with the practice assessors and academic assessors to share relevant observations on the conduct, proficiency and achievement of students they are supervising. Practice supervisors are present at the initial interview with the student and at the interim interview with the practice assessor where there is formative fine grading of practice learning and achievement. The practice supervisor contributes to the formative assessment of students.

The documentation clearly evidences that students are assigned a nominated practice assessor, who is a registered midwife, at the beginning of a practice learning experience or period. The practice assessor periodically observes the student across the placement to make an informed decision. The practice assessor conducts assessments to confirm student achievement and proficiencies which lead to the final programme outcomes and is evidenced in the PAD. Assessment decisions are informed by feedback sought from the practice supervisors and from reviewing the PAD.

The practice assessor makes and records objective evidence-based assessments on the conduct, proficiency and achievement of the student drawing on the student's records, through direct observation of the student, student reflection and other resources. The 'fine grading of practice' assessment tool is utilised by the practice assessor to grade the student achievement and provide ongoing feedback. The grading of practice is unchanged. Practice assessors communicate effectively with the academic assessor regarding student progress and achievement. The practice assessor contributes to the assessment of student progression at two summative points in the academic year. The documents provided clearly demonstrate the changes made to adhere to the SSSA. Grading of practice is completed by the practice assessor and guidance on grading is found in the PAD for years one, two and three of the programme.

Each student is assigned an academic assessor who is a registered midwife, at the beginning of the academic year. The academic assessor agrees student achievement of proficiencies and programme outcomes for each part of the programme. The academic assessor works in partnership with the nominated practice assessor at the end of the academic year (progression point) to evaluate

and recommend progression for that part of the programme. The progression points in the programme remain unchanged.

A formal meeting between the student and their allocated practice supervisor and assessor should take place within three days of the placement; this standard is laid out in the PAD. Formative feedback is given to students by the practice supervisor and assessor and documented in the PAD at set points in the practice learning experience. Summative assessment occurs at the end of each experience and is completed with the practice assessor and academic assessor. If any concerns are raised regarding a student's performance, the practice assessor will escalate it to the academic assessor or link teacher in the first instance. The concerns will be documented in the PAD and an action plan will be written in conjunction with the academic assessor. The LME will be informed about those concerns as will the education champion who will also provide additional support to the student, practice assessor and practice supervisor.

Outcome:	Standard met
Date standards met:	
Revised outcome:	

Standard 16: Ongoing record of achievement

An ongoing record of achievement, including comments from mentors, must be passed from one placement to the next to enable judgements to be made on the student's progress.

What we found:

The ongoing achievement record (OAR) is included in the student's red book. The red book is the overall ongoing achievement record that allows PLPs to be reassured of the student midwife's progression from one academic year to the next. The red book comprehensively contains the OAR ; EU directives, baby friendly initiative (BFI) requirements and caseload. The documentation provided is clear and without error.

<p>The OAR has been revised in alignment with the SSSA requirements. Both practice supervisors and practice assessors contribute to the document by signing every practice experience achieved by the student as an ongoing record of achievement. In addition to the OAR there is a newborn and infant physical examination (NIPE) PAD for the recording of NIPE undertaken in practice placement. The practice supervisor and practice assessor contribute to the document by signing the recordings made by the student as a record of NIPE achievement.</p>	
Outcome:	Standard met
<p> </p>	
Date standards met:	
Revised outcome:	
<p> </p>	

Achieving the NMC standards	
Standard 17: Competencies required to achieve the NMC standards	
<p>Students need to be proficient in all standards by the end of their training in order to practise safely and effectively as a midwife without the need for direct supervision. A student must demonstrate competence in these standards to enter the register as a midwife.</p>	
What we found:	
Standard 17 is unchanged since original approval on 20 January 2014.	
Outcome:	Standard met
<p> </p>	
Date standards met:	
Revised outcome:	

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<u>NMC Circular 03/2011</u>	
Resources to support programme intentions	
Programme providers must provide evidence at programme approval that resources are currently available to support programme intentions.	
What we found:	
The programme team discussion, documentation and partnership agreements support the evidence that there are sufficient resources in the university and in PLP organisations including practice learning environment capacity, practice supervisors, practice assessors and academic assessors to support the implementation of the SSSA.	
Outcome:	Standard met
Date standards met:	
Revised outcome:	

Evidence and references list
FAQs, undated
Flyer SSSA Mid Essex, undated
Midwifery forum minutes, 26 November 2018
Practice learning model SSSA, undated
Screen shot of online portal of online materials for clinical staff preparing for SSSA,

undated

Screen shot of student related to SSSA, information, undated

Screen shot of practice assessor and practice supervisor online workshop, undated

Student staff liaison committee (SSSLC) meetings, 9 April 2018

ARU NHS transition SSSA partnership placement agreement, undated

Example of communication message strategy for students – placements online, undated

Guidance for practice SSSA, 2 January 2019

Link tutor role description, September 2017

Student fora terms of reference, 9 May 2012

Case load guidelines, undated

Red book with caseload evidence, May 2019

Previous PAD Year 1, 2 ,3, undated

SSSA changes PAD year 1,2,3, 2019

NIPE PAD, undated

Red book, May 2019

Supervisor, assessor role descriptors undated

Academic assessor role description, undated

Practice assessment flow chart, undated

Practice assessor roles, undated

Assessor preparation flow chart, undated

Education champion role description, undated

Practice education committee minutes Cambridge University Hospital, 18 July 2018

Practice education committee minutes East Suffolk North Essex Foundation Trust, 26 October 2018

Practice Education Group and quality learning environment group terms of reference, September 2018

Practice Education Group (PEG) minutes, 7 December 2018

Quality learning environment group minutes, 3 December 2018

Personnel supporting programme approval

Members of Approval Panel

NMC QA visitor						
Programme Presenters						
ARU LME						
Head of practice learning						
Course leader, Chelmsford						
Course leader, Cambridge						
Were any service providers visited?						
<i>This was a desktop review.</i>						
Meetings with others						
Mentors / sign-off mentors						
Practice teachers						
Service users / Carers						
Practice Education Facilitator						
Director / manager nursing						
Director / manager midwifery						
Education commissioners or equivalent						
Designated Medical Practitioners						
Other (please specify)						
If there were no representatives present during the approval event please state why: This was a desktop review.						
Meetings with students						
Nursing						

Adult	Year 1	Year 2	Year 3	Year 4
Mental Health	Year 1	Year 2	Year 3	Year 4
Children's	Year 1	Year 2	Year 3	Year 4
Learning Disabilities	Year 1	Year 2	Year 3	Year 4
Midwifery (3 year)	Year 1	Year 2	Year 3	
Midwifery (18 month)	Year 1	Year 2		
SCPHN	HV	SN	OH	FHN
Learning and Assessment in Practice	Mentor	Practice Teacher	Teacher	
Nurse Prescribing	V100	V150	V300	
Specialist Practice	Adult	Mental Health	Children's	
	Learning Disability	General Practice Nursing	Community Mental Health Nursing	
	Community Learning	Community Children's	District Nursing	

		Disabilities Nursing	Nursing	

Additional evidence viewed

CQC reports from:

East Suffolk and North Essex NHS Foundation Trust, 2 November 2017

Essex Partnership University NHS Foundation Trust, 26 July 2018

Mid Essex Hospital Services NHS Trust, 30 January 2019

Princess Alexandra Hospital NHS Trust, 21 March 2018

Mott MacDonald Group Disclaimer

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Issue record

Author:	Hilary Lumsden	Date:	08 Aug 2019
Checked by:	Bernie Wallis	Date:	09 Aug 2019
Approved by:	Helen Shapcott	Date:	13 Aug 2019