

**JUNIOR SCHOOL BEHAVIOUR POLICY**  
**This policy covers all pupils in the Junior School, including EYFS**

**INTRODUCTION**

In all our interactions with pupils, we value academic excellence, a loyalty and commitment to the school and to each other, honesty and integrity, a sense of responsibility, tolerance and acceptance of others whilst promoting British Values. We recognise the individuality and uniqueness of each person and encourage their development whilst being aware of the needs of the whole school community. Every person should have the opportunity to fulfil his or her own potential.

Teachers are role models for pupils and should therefore always act in an appropriate manner on all occasions. The underlying philosophy of the school's behaviour management approach is that everyone will act with courtesy, common sense and consideration to others at all times. A sense of mutual trust, therefore, lies at the heart of the school's beliefs.

**DEFINITION**

For the purpose of this policy:

Behaviour is defined as 'the way in which one acts or conducts oneself, especially towards others' (oxforddictionaries.com). Behaviour management is defined as: the principles, strategies, expectations, boundaries and consequences used to promote the safety, learning and well-being of all members of the school community.

**STATEMENT**

Royal Russell School is committed to the health, safety and well-being (both physical and emotional) of all children in its care and will deploy stringent and active measures to safeguard these aims to provide a safe environment in which the pupils can develop, in line with evolving governmental guidance and statutory obligations. Our policy is underpinned by the principle that children and staff need to be fully aware of consistent expectations, boundaries and consequences with regard to behaviour and is implemented in conjunction with the policies stated in the 'LINKS' section on the final page.

This policy applies to the children from Nursery to Year 6 and is written with regard for The Statutory framework for the Early Years Foundation Stage (including Safeguarding and Welfare Requirements) April 2017, Equality Act 2010, Keeping Children Safe in Education (2019), Special Educational Needs and Disability Code of Practice (DfE 2015), Behaviour and Discipline in Schools (2016), Use of Reasonable Force (DfE 2013) and The Independent School Standards: Guidance for Independent Schools (April 2019).

This policy aims to support the implementation of the School's anti-bullying policy.

The Governors and School Leadership Team recognise their duties under the Education (Independent School Standards) (England) (Amendment) Regulations 2014 as follows:

## Part 2

### 5. Ensure that principles are promoted which:

- (i) enable pupils to develop their self-knowledge, self-esteem and self-confidence;*
- (ii) enable pupils to distinguish right from wrong and to respect the civil and criminal law;*
- (iii) encourage pupils to accept responsibility for their behaviour, show initiative and understand how they can contribute positively to the lives of those living and working in the locality in which the school is situated and to society more widely;*
- (iv) provide pupils with a broad general knowledge of public institutions and services in England;*
- (v) assist pupils to acquire an appreciation of and respect for their own and other cultures in a way that promotes tolerance and harmony between different cultural traditions; and*
- (vi) encourage pupils to respect the fundamental British values of democracy, the rule of law, individual liberty and mutual respect and tolerance of those with different faiths and beliefs;*

## Part 3

7. (a) Arrangements are made to safeguard and promote the welfare of pupils at the school; and (b) such arrangements have regard to any guidance issued by the Secretary of State.

9. Ensure that a written policy promotes good behaviour amongst pupils and sets out the sanctions to be adopted in the event of pupil misbehaviour is drawn up and effectively implemented.

10. Ensure that an effective anti-bullying strategy is drawn up and implemented

## AIMS

- To promote a positive ethos and climate in the school
- To create an environment that expects, encourages and reinforces good behaviour
- To promote self-esteem, mutual respect and caring attitudes where all achievements are acknowledged and celebrated
- To define and implement consistently acceptable standards and the principles of expected behaviour
- To ensure strategies for behaviour managements are understood by pupils, parents and staff as well as the wider school community
- To encourage consistency of response, through a whole Junior School approach, to both positive and negative behaviour that is clearly understood by pupils, parents and staff

## SCHOOL CODE OF CONDUCT

To promote a sense of autonomy and responsibility for our pupils, the Code of Conduct is established to guide pupils towards a positive way of behaving, in place of the semantics of imposing a set of rules.

The School Code of Conduct is based on the 3Cs

- Courtesy
- Common sense
- Consideration

The School Code of Conduct applies to all members of the Junior School on school site or when travelling to and from school, when attending fixtures or whilst out on educational visits. Behaviour that does not apply these principles is unacceptable.

In the Lower Juniors, the 3Cs have been simplified to ensure the language is more appropriate:

- Be kind
- Be safe
- Do your best.

Our expectations of children are:

<b>Courtesy</b>	<b>Be Kind</b>
Listen to each other and adults Treat other people with respect and politeness Ensure your behaviour allows others to enjoy learning and playing Greet pupils, staff and visitors politely Demonstrate good manners such as shaking hands with adults when leaving school	
<b>Common Sense</b>	<b>Be Safe</b>
Behave in a way that is safe for yourself and others Ensure that you remain in the right place at the right time Arrive at every lesson or activity on time, with everything you need Wear the appropriate uniform or kit for each of your lessons and activities Follow instructions from adults immediately and sensibly Walk quietly and sensibly around school Always ensure an adult knows when you are leaving the school site	
<b>Consideration</b>	<b>Do your best</b>
Look after our environment, both indoors and outdoors Look after and respect both your own and other people's property Respect other people's views, beliefs and ways of life Talk through any differences of opinion calmly and ask for adult support if needed Work responsibly and to the best of your ability	

Our expectations of all adults working with children are to:

- Be role models for pupils in school including punctuality, organisation and preparation
- Implement the 3 Cs in a fair and consistent manner. Staff should set and insist upon high standards
- Use specific and constructive feedback (including verbal and written marking) for appropriate work and behaviour (whether focused on effort or ability) giving clear indications of points for improvement.
- Provide a stimulating, relevant and accessible learning environment that promotes independence of learning routines
- Plan and teach motivating and engaging lessons, taking into account information gained through assessment in order to differentiate and personalise learning for all
- Implement the agreed strategies of praise, reward and, if necessary, age appropriate sanctions
- Ensure record keeping and sanctions are recorded punctually in accordance with policy
- JLT will report to Governors when requested on the effectiveness of the policy

### RECOGNITION AND REWARDS

<b>Upper Juniors</b>	<b>Lower Juniors</b>
Verbal praise	Verbal praise
Positive written comments in line with the marking policy	Positive written comments in line with the marking policy
Stickers	Stickers
Russell Powers leaf certificates	Russell Powers leaf certificates
House Tokens system	House Tokens system
Headmasters' Merits	Celebration Certificates and Individual badges
Play Leaders	Helping Hands
Individual badges	Recognition from DH and HM
Heads of School	End of Year prizes
Prefects	
Recognition from DH and HM	
End of Year prizes	

In order to ensure consistency of approach, members of staff and children across the school use a visual chart for behaviour management as follows:



This is displayed prominently in every classroom. Each child in the class has a peg with their name attached to it. At the start of every day, all children begin on the green part of the chart. This is the expected level of behaviour.

If children behave in ways which are deemed unacceptable, they must move their peg down the chart to the next level. Unacceptable behaviour is not limited to the classroom where the chart is and pegs will be moved for unacceptable behaviour whilst moving around school, in the playground etc. See 'Sanctions' below for more detail.

#### **Pastoral Rewards:**

**Silver Star** - A child may be awarded the 'Silver Star' for exceptional behaviour that is above and beyond expectations for that child (Silver Stars will be rare and should be seen as the pinnacle of pastoral reward). Children who reach the Silver Star during the week will also be awarded a certificate in the weekly celebration assembly and have their names added to the slide in the weekly bulletin. Any child who is moved to the Silver Star will gain a silver star token (worth 5 house tokens).

**Pastoral Credit Tokens** - A child may be awarded a house credit token for 'one off' instances of exemplary behaviour that do not warrant the award of a silver star. Children place the token directly into the collection point and they will be totalled every half term and the winning house will receive the House Credits Cup.

**Russell Power Leaf Certificates** – A child may be awarded a Russell Powers leaf certificate for exceptional effort or achievement which demonstrates use of any of our seven Russell Powers. Certificates should be awarded according to who is most deserving and a tick list / turn taking approach is discouraged. Certificates are awarded at the Lower and Upper Junior Celebration Assemblies and the children can then record their achievement on a leaf template which is hung from our Russell Powers tree in the school lobby.

#### **Academic Rewards:**

##### **Academic Credit Tokens**

Children receive one credit for work which is above the standard expected in relation to the ability and effort of that individual child. Staff stamp the child's book and record the credits on a central spreadsheet and award physical tokens to children for adding to the class collection point. One person from each house then takes tokens to the main collection point on a weekly basis; this person changes

each week. On a weekly basis, the class with the most academic credits will receive the Class Academic Cup in the Upper Juniors and Russell Lion in the Lower Juniors.

Upper Juniors:

Throughout the academic year, as the children collect credits, they will be awarded certificates by the Head Master during celebration assembly. Once a child has reached the Bronze/Silver/Gold stages, they will also be awarded a small badge alongside their certificate which they may wear on their blazers.

<b>Year</b>	<b>Pink</b>	<b>Blue</b>	<b>Purple</b>	<b>Bronze</b>	<b>Silver</b>	<b>Gold</b>
3 - 6	10	20	30	45	60	75

Upper Junior Headmasters' Merit Card

These are awarded for work that is exceptional for that individual child. If a member of staff feels that a piece of work is worthy of a merit, they should send it to the Headmaster with a short citation about why the work qualifies. The child concerned should not be informed their work has been sent for a potential merit. The Headmaster will use his discretion and may award a Headmasters' Merit. This award will be presented in the weekly Rewards and Recognitions assembly.

Upper Junior Headmasters' Gold Merit Badge

These are awarded if a child has gained four merits in an academic year (Gold Merit Badges should be very rare and should be seen as the pinnacle of academic reward).

The children are very well motivated by the House system and are keen to participate in the competition it encourages. All success in sport and music contributes to these House totals. At the end of the year, all credits and tokens are totalled and the House Shield for the best performing House is awarded to the house representatives on Royal Russell Day.

Each year, a number of the most responsible children in Year 6 are chosen to be Prefects, with the two most outstanding being appointed as Heads of School. Each term, the Heads of School roles are appointed to different children and additional Prefects are chosen. These Prefects will be awarded either a special tie or cravat in a whole school assembly. These positions are much coveted by the children in Year 6, who are keen to be appointed. In the Lower Juniors, responsible Year 2 children are chosen to be Helping Hands. New Helping Hands are chosen each half term and these children help to organise our weekly Lower Junior Celebration Assembly. The teachers at Royal Russell Junior School do all that they can to acknowledge and reward positive work, effort and behaviour.

## **SANCTIONS**

We operate a clear set of sanctions, as detailed below. We aim to pre-empt and prevent unacceptable behaviour, however, when instances of behaviour that is below our expectations do occur, it is our aim to deal promptly, but separately, with all individuals concerned, making clear the reasons for any sanction that is applied. We seek to do this in active partnership with parents (through comments in person, by letter, e-mail or phone call). We aim to ensure, at all times, that the pupil understands that it is the behaviour that is unacceptable while they themselves are respected and valued. All incidents of mis-behaviour that are Level 3 or above are recorded on the behaviour log on iSAMS.

Level	Type of Behaviour being exhibited	Action Taken	Sanction
1 – Member of staff responsible for the pupil	Minor demeanours: Talking or interrupting whilst someone else is speaking; Not working to the best of their own ability; Moving around school inappropriately	Verbal reminder that behaviour is not as expected, including a clear indication of what is expected. Apology expected from child. Followed by acknowledgement and praise if child modifies behaviour.	N/A
2 – Member of staff responsible for the pupil	Repetition of any behaviour as described in Level 1 Unkind comments or actions	Reported to class teacher.	Move to yellow zone. Move seat within the classroom.
3 – Class teachers	Rudeness to staff; Disruption of learning or activity; Physical behaviour that upsets someone	Recorded on class behaviour management sheet. Parents informed by form teacher. iSAMS updated.	Move to orange zone. Move to parallel year group's classroom. Time out for 20 minutes at JLT Mindfulness session
<b>If a pupil accumulates 3 mindfulness sessions in a half term the next sanction will be a JLT after school detention</b>			
4 – Deputy	Physical behaviour that results in, or could result in, someone being hurt without apparent intent	Recorded on class behaviour management sheet. Parents informed. iSAMS updated.	Move to red zone. Time out for 30 minutes at JLT Mindfulness session or After school JLT detention 3.45 – 4.45pm
5 – Deputy	Physical behaviour that results in someone being hurt which occurs through aggression or deliberate intent Hurtful, discriminative comments	Recorded on class behaviour management sheet. Parents informed by DH Letter sent. iSAMS updated.	Internal suspension, in consultation with HM or DH.
6 – HM	Repetition of any Level 4 behaviour. Act of physical behaviour towards staff or any malicious accusations towards staff	Recorded on class behaviour management sheet. Parents informed by HM and asked to collect. Letter sent. iSAMS updated.	External suspension.

Temporary suspension from School is only used in extreme cases and will require consultation with both the Headmaster and the pupil's parents. Only the Headmaster and the Governors can take the decision to permanently exclude a pupil from the school. This step would be taken only as a last resort or in the case of serious misbehaviour on the part of a pupil. Further details are given below.

## **ALL FORMS OF CORPORAL PUNISHMENT ARE STRICTLY FORBIDDEN**

When dealing with behaviour that falls short of our expectations, members of staff should always:

- Use a tone that is calmly assertive, avoiding shouting unless safety is compromised.
- Maintain body language that is not threatening, lowering to the physical height of younger children avoiding raising voice, hands or pointing fingers.
- Avoid any comments that are sarcastic or humiliating.
- Give children an opportunity to explain their actions and apologise, without making assumptions.
- Explain that the behaviour and its consequences are unacceptable without labelling the child.
- Support the child in reflecting upon their actions and identifying a positive way forward.
- Maintain and communicate positive expectations of the child.
- Adhere consistently to the matrix of strategies above.
- Seek support from a colleague or JSMT if unsure.

Staff must acknowledge the school's legal duties under the Equality Act 2010, with regard for Keeping Children Safe in Education (DfE 2019) and the Special Educational Needs and Disability Code of Practice (DfE / DoH 2014).

Any concerns relating to a pupil's behaviour that may be considered as a possible underlying response to a special educational need or disability must be referred to the Deputy Heads and Head of Learning Enrichment, to work in partnership with parents and consider whether a multi-agency assessment is necessary.

If the behaviour is criminal or poses a serious threat to a member of the public, the police should always be informed. In addition, school staff should consider whether the behaviour may be linked to the child suffering, or being likely to suffer, significant harm. In this case the school staff should alert the Designated Safeguarding Lead and follow its child protection and safeguarding policy.

### **RESTRAINT OF PUPILS**

If the preceding strategies in this policy are followed, it is expected that any incidence requiring physical intervention or restraint of pupils would be extremely rare.

Before intervening physically, a teacher should, wherever practicable, tell the pupil who is misbehaving to stop, and what will happen if he or she does not. The teacher should summon another adult if possible to do so whilst continuing to attempt to communicate with the pupil throughout the incident and should make it clear that physical contact or restraint will stop as soon as it ceases to be necessary. A calm, reassuring approach to a situation is needed and teachers must avoid any words or actions that could indicate they are punishing the child or are acting out of personal frustration or anger. Appropriate follow up action should be taken where necessary. This may include providing medical support and/or providing respite for those involved.

If a potentially dangerous situation arises, adults are advised to act in accordance with the Advice from Department for Education (2013 & 2014) in order to protect the children in their care as well as minimise any risk of acting unlawfully.

Members of staff have the power to use reasonable force to prevent pupils committing an offence, injuring themselves or others, or damaging property, and to maintain good order and discipline in the classroom.

School staff have a power to use force and lawful use of the power will provide a defence to any related criminal prosecution or other legal action.

## **What is reasonable force?**

1. The term 'reasonable force' covers the broad range of actions used by most teachers at some point in their career that involve a degree of physical contact with pupils.
2. Force is usually used either to control or restrain. This can range from guiding a pupil to safety by the arm through to more extreme circumstances such as breaking up a fight or where a student needs to be restrained to prevent violence or injury.
3. 'Reasonable in the circumstances' means using no more force than is needed.
4. As mentioned above, schools generally use force to control pupils and to restrain them. Control means either passive physical contact, such as standing between pupils or blocking a pupil's path, or active physical contact such as leading a pupil by the arm out of a classroom.
5. Restraint means to hold back physically or to bring a pupil under control. It is typically used in more extreme circumstances, for example when two pupils are fighting and refuse to separate without physical intervention.
6. School staff should always try to avoid acting in a way that might cause injury, but in extreme cases it may not always be possible to avoid injuring the pupil.

## **Who can use reasonable force?**

All members of school staff have a legal power to use reasonable force.

This power applies to any member of staff at the school. It can also apply to people whom the Head Master has temporarily put in charge of pupils such as unpaid volunteers or parents accompanying students on a school organised visit.

## **When can reasonable force be used?**

Reasonable force can be used to prevent pupils from hurting themselves or others, from damaging property, or from causing disorder.

In a school, force is used for two main purposes – to control pupils or to restrain them.

The decision on whether or not to physically intervene is down to the professional judgement of the staff member concerned and should always depend on the individual circumstances.

The following list is not exhaustive but provides some examples of situations where reasonable force can and cannot be used.

### **Schools can use reasonable force to:**

- remove disruptive children from the classroom where they have refused to follow an instruction to do so;
- prevent a pupil behaving in a way that disrupts a school event or a school trip or visit;
- prevent a pupil leaving the classroom where allowing the pupil to leave would risk their safety or lead to behaviour that disrupts the behaviour of others;
- prevent a pupil from attacking a member of staff or another pupil, or to stop a fight in the playground; and
- restrain a pupil at risk of harming themselves through physical outbursts.

### **Schools cannot:**

- use force as a punishment – it is always unlawful to use force as a punishment.



## **Power to search pupils without consent**

In addition to the general power to use reasonable force described above, the headmaster and authorised staff can use such force as is reasonable given the circumstances to conduct a search for the following “prohibited items”:

- knives and weapons
- alcohol
- illegal drugs
- stolen items
- tobacco and cigarette papers
- fireworks
- pornographic images
- any article that has been or is likely to be used to commit an offence, cause personal injury or damage to property.

Weapons and knives and extreme or child pornography must always be handed over to the police, otherwise it is for the teacher to decide if and when to return a confiscated item.

Force cannot be used to search for items banned under the school rules. (For further advice see Searching, Screening and Confiscation (DfE January 2018).

Staff have a legal duty to make reasonable adjustments for disabled children and children with special educational needs.

Schools do not require parental consent to use force on a student/pupil.

At all times, the safety of the pupil being restrained must be considered and under no circumstances should present any risk of their airway be restricted. If any possibility exists that a child has been harmed through force immediate referral to the medical centre should be made, or in more serious cases, emergency services called.

Techniques of restraint that present unacceptable risks and must be avoided, include:

- the ‘seated double embrace’ which involves two members of staff forcing a person into a sitting position and leaning them forward, while a third monitors breathing;
- the ‘double basket-hold’ which involves holding a person’s arms across their chest; and
- the ‘nose distraction technique’ which involves a sharp upward jab under the nose.

The Headmaster should consider whether members of staff require any additional training to enable them to carry out their responsibilities and should consider the needs of the pupils when doing so.

### **Informing Headmaster and parents of the use of force and restraint.**

If any use of force or restraint is used, it should be documented and passed to the Headmaster (or Deputies in absence of Head) as soon as is practically possible.

This should include:

- Date
- Time
- Location
- Pupil’s name
- Name of the member of staff using force
- Brief background to the need to use force
- Details of the force used including timescales
- Details of any marks or injury caused to the pupil and the medical advice sought
- Names of any adults or children who witnessed the incident

The Headmaster will inform the parents as deemed to be appropriate for the situation.

Any complaints arising as a result of a child being restrained or force being used, will be handled in accordance with the Complaints Policy of the School. All complaints about the use of force should be thoroughly, speedily and appropriately investigated. The school will refer to the “Dealing with Allegations of Abuse against Teachers and Other Staff” guidance where an allegation of using excessive force is made against a teacher. The Governing body should always consider whether a teacher has acted within the law when reaching a decision on whether or not to take disciplinary action against the teacher.

### **Physical contact with pupils**

It is not illegal to touch a pupil. There are occasions when physical contact, other than reasonable force, with a pupil is proper and necessary. Examples of where touching a pupil might be proper or necessary:

- Holding the hand of the child at the front/back of the line when going to assembly or when walking together around the school;
- When comforting a distressed pupil;
- When a pupil is being congratulated or praised;
- To demonstrate how to use a musical instrument;
- To demonstrate exercises or techniques during PE lessons or sports coaching; and
- To give first aid.

### **Temporary Suspension from School**

Only the Headmaster can take the decision to suspend a pupil from the school. In all cases this would only be after consultation with another member of JSMT.

This can take two forms:

An Internal Suspension where a child is removed from class, provided with work to do in a safe and supervised environment and collected by parents at the end of the school day or an agreed time.

An External Suspension where a child is asked to leave the school for a fixed period.

### **Permanent Exclusion from School**

Only the Headmaster can take the decision to expel a pupil from the school. This step would be taken only as a last resort or in the case of serious criminal misbehaviour on the part of a pupil. The Whole School Exclusion Policy provides further guidance in such circumstances.

### **RULES RELATING TO THE REVIEW OF REMOVAL OR EXCLUSION OF A PUPIL**

- (1) These Rules are made pursuant to clause 6(a) of the Standard Terms and Conditions.
- (2) The hearing of a Review shall be before a panel of three members of the governing body, one of whom shall be appointed Chair. The panel will be appointed by the Board when a request for a Review has been lodged.
- (3) (a) The parents of a pupil who desire a Review of a decision to require the removal, or to expel, that pupil shall give notice in writing to the Headmaster within 14 days of the decision. The notice should set out:
  - (i) the date of the decision to be reviewed;
  - (ii) a short summary of the facts of the case; and
  - (iii) the grounds of dissatisfaction

- (b) The right to a Review will be lost if such notice is not given within 14 days.
- (4) Upon receipt of such notice a copy shall be sent to the Chair of the governing body and such other person(s) as may be deemed necessary.
- (5) Within 14 days of receipt of the notice, the Headmaster shall prepare a Review File consisting of:-
- (a) the notice;
  - (b) the summary of the case supporting the decision to be reviewed;
  - (c) copies of any statements or reports which are relied upon to support the decision; and
  - (d) a note identifying whether an oral hearing is desirable, whether it is intended to call witnesses, and if so whom.
- (6) A copy of the Review File shall be sent to the parents and to the persons referred to in Clause 4 above.
- (7) Within 7 days of the receipt of the Review File the parents may send to the Headmaster a statement in response to the matters set out in the Review File. A copy of any such statement shall be sent to the persons referred to in Clause 4 above.
- (8) Further procedure shall be determined by the Chair of the Review panel. In particular, he should determine whether the matter can be disposed of on the documentation alone or whether an oral hearing is necessary.
- (9) (a) At an oral hearing the strict rules of evidence will not be applied, but the Review will be heard in accordance with the principles of natural justice. In particular, the parents must be given an opportunity to be fully heard and/or represented on all relevant matters.
- (b) No final decision may be arrived at before the evidence and/or representations have all been fully heard and thoroughly considered.
- (10) After the conclusion of the hearing, or following consideration of the documentation alone, as the case may be, the Review panel will provide a decision in writing supported by reasons.
- (11) "The Headmaster" and "The Parents" have the same meaning as defined in Clause 7 sub paragraphs (b) and (c) respectively of the Standard Terms and Conditions.

## **TRANSITION TO THE SENIOR SCHOOL**

All information on behaviour (as well as other pastoral and academic information) is passed on from teacher to teacher via class transition meetings at the beginning of each academic year. In the Summer term, Year 6 staff, the Deputy Heads and the Assistant Head of the Junior School meet with Year 7 tutors and the Head of Year 7 to handover information, including but not exclusive to, behaviour. All staff, both Junior and Senior, have access to any notes made on iSAMS as well as individual behaviour logs. The Deputy Head Pastoral and other Senior School DSLs also have access to My Concern for any Safeguarding matters.

## **MONITORING AND EVALUATION**

This implementation of this policy will be monitored by the Head Master and Deputy Heads. The policy will be shared with the Governing Body and reviewed every three years. Regard will be given to any changes in guidance arising from the Department for Education in the interim period. At the time of review, the policy was amended to reflect Advice from the DfE in July 2013, (updated DfE advice February 2014) in line with the Education Act 2002, Education and Inspections Act 2006 and the Education (Independent School Standards) (England) (Amendment) Regulations 2012.

**ORIGIN**

The policy is reviewed and updated by JSMT

**LINKS**

**Safeguarding Policy**

**Anti – Bullying Policy**

**Parental Complaints Policy**

**SEND Policy**

**SENDA – Equality Act 2010 Schedule 10**

<b>REVIEW</b>	<b>April 2018</b>
<b>REVIEWED BY</b>	<b>JSMT and EWC</b>
<b>REVIEWED AND APPROVED BY EWC</b>	<b>October 2018</b>
<b>APPROVED BY BOARD</b>	<b>December 2018</b>
<b>REVIEWED BY JLT</b>	<b>June 2019</b>
<b>REVIEWED AND APPROVED BY EWC</b>	<b>September 2019</b>
<b>REVIEWED AND APPROVED BY BOARD</b>	<b>December 2019</b>
<b>NEXT REVIEW</b>	<b>April 2021</b>