



Eko Trust
Early Help, Safeguarding and Child Protection Policy

Earlham Primary School

This policy has been devised in accordance with the following statutory documents:

- **Children Act 1989**
- **Children ACT 2004**
- **Education Act 2002**
- **Woking Together to Safeguard Children (2015)**
- **Keeping Children Safe in Education 2016 (no updates Sep 2017)**

First Adopted by Eko Trust Dec 2016

Reviewed, amended and adopted by Eko Trust Sep 2017

Next review September 2018, or each time any subsequent guidance is issued by the Secretary of State, or annually, whichever is the most appropriate.

CONTENTS

Introduction and Policy Statement	Page 3
1. The Trust’s Early Help, Safeguarding and Child Protection Policy	Page 4
2. Keeping Children Safe – Early Help, Safeguarding	Page 5
▪ Responding to Concerns	
▪ Recognition and Response	
▪ Types of Abuse and Neglect	
3. Safeguarding - Providing a Safe Environment	Page 7
4. Early Help, Safeguarding & Child Protection in Specific Circumstance	Page 8
▪ Attendance	
▪ Pupil Behaviour	
▪ Bullying	
▪ Online Safety	
▪ Health & Safety	
▪ Gangs and youth violence	
▪ Child Sexual Exploitation	
▪ Female Genital Mutilation	
▪ Preventing Extremism and Radicalisation	
▪ Children who are particularly vulnerable	
5. Working Together with Parents and Carers	Page 10
▪ Pupil Information	
▪ Confidentiality	
▪ Referrals to Partner Agencies	
▪ Sharing our Policy	
6. Adults working with Children	Page 11
▪ Safer Recruitment	
▪ Safe Practice	
7. Monitoring and Review	Page 14

Introduction and Policy Statement

All schools are required to have a Safeguarding and Child Protection Policy that guides the procedures and practices of staff when safeguarding children and promoting their welfare. The Trust takes very seriously its duty towards all its pupils who have been entrusted to its care and seeks to provide a school environment where all children are safe, secure, valued, respected, and listened to.

The Trust understands that our work in safeguarding and protecting children must always have regard for the national guidance issued by the Secretary of State and should be in line with local guidance and procedures.

We understand the term Safeguarding to mean that we will take all reasonable measures to ensure that the risk of harm to children's welfare is minimised. We also understand that where we have any concerns about a child's welfare we will take all appropriate action to address those concerns by working in full partnership with other agencies.

All staff in the Trust believe that a range of other school policies are central to many aspects of the Trust's Early Help, Safeguarding and Child Protection Policy, and this document should therefore be read in conjunction with our Policies for:

- Anti-Bullying
- Attendance
- Behaviour Management and Physical Intervention
- e-Safety
- Health & Safety
- Safer Recruitment
- Safe Working Practices for Staff and Volunteers

Our Early Help, Safeguarding and Child Protection Policy is written with due regard to the Department for Education statutory guidance [Keeping Children Safe in Education](#) (last updated September 2016) and will be reviewed each time any subsequent guidance is issued by the Secretary of State, or annually, whichever is the most appropriate.

Our Trust procedures for safeguarding children will always be compliant with the London Child Protection Procedures produced by the London Safeguarding Children Board and have been adopted as available from the [Newham Safeguarding Children Board](#).

Our procedures will be followed by all adults, including volunteers, working with or on behalf of the Trust, through regular briefings, safeguarding guidelines documents and visitors' cards.

Our Policy was adopted in December 2016 and is reviewed annually by the Governors of The Trust, the Headteachers and the Designated Safeguarding Leads. It will be reviewed in July each year together with the review of the Annual Report to Governors (Section 11 Safeguarding Audit).

This policy is available to all parents either in hard copy or from our website:

www.ekotrust.org.uk

1. The Trust Early Help, Safeguarding and Child Protection Policy

The Trust is committed to Early Help, Safeguarding and Child Protection in order to promote the welfare of all its pupils and the Governors expect all staff and volunteers to share this commitment. Staff must demonstrate their understanding of how each individual adult working on behalf of the school has an active part to play in identifying a child or young person's concerns early - to prevent needs escalating and to protect those at risk of harm.

- 1.1. All staff must be clear about their responsibility and that of others in providing a caring and safe environment for all pupils to learn.
- 1.2 To this end the Trust will ensure that all staff, whether permanent or temporary, and volunteers are aware of systems within the school which support early help and safeguarding and should be explained to them as part of staff induction.
- 1.3 **All** staff have a responsibility to identify children who may be in need of extra help or who are suffering, or are likely to suffer, significant harm. **All** staff then have a responsibility to take appropriate action, working with other services as needed.
- 1.4 All staff should know who the Designated Safeguarding Leads are in each of the schools.
- 1.5 All Designated Safeguarding Leads have received training in order to undertake the role and support staff to carry out their early help and safeguarding duties and responsibilities.
- 1.6 In the absence of the Designated Safeguarding Leads on a day to day basis, schools will ensure that they have members of staff who have the knowledge and skills necessary to deputise.
- 1.7 There is a Lead Safeguarding Governor for the Trust.
- 1.8 All staff will receive appropriate training during their induction period, and regularly thereafter in order that they are equipped with the skills needed to keep children safe.
- 1.9 The Trust will always follow safe recruitment procedures so that we can be confident that all adults working in our school are safe to do so.

2. Keeping Children Safe – Early Help, Safeguarding and Child Protection

2.1 Responding to Concerns

2.2 All children in the Trust must be able to place their trust and confidence in any adult working in the school. They must feel sure that they can speak about any worries or concerns they may have and that they will be listened to, taken seriously and responded to appropriately. All staff must therefore know what to do if a child chooses to talk to them about any matter which raises child protection concerns.

2.3 All staff must:

- Listen to what the child is saying without interruption and without asking leading questions.
- Respect the child's right to privacy but not promise confidentiality
- Reassure the child that he/she has done the right thing in telling.
- Explain to the child that in order to keep him/her safe from harm the information that has been shared must be passed on.
- Report what has been disclosed to the Designated Person in the school.
- Record, as soon as is practicable, what was said using the child's actual words
- Sign and date the record and/or use the school's online system for reporting concerns

2.4 The Designated Safeguarding Lead will:

- Consider if early help can be offered to support and prevent the child or young person's needs escalating.
- Assess any urgent medical needs of the child.
- Consider whether the child has suffered, or is likely to suffer significant harm.
- Check whether the child is currently subject to a Child Protection Plan or has been previously subject to a Plan.
- Confirm whether any previous concerns have been raised by staff.
- Consider whether the matter should be discussed with the child's parents or carers or whether to do so may put the child at further risk of harm because of delay or the parent's possible actions or reactions
- Seek advice if unsure that a child protection referral should be made.

In addition the Designated Safeguarding Lead will chair a monthly meeting of safeguarding trained senior leader practitioners to review and evaluate the above.

2.5 The Designated Safeguarding Lead will decide whether to consider offering Early Help to support the family or to make a referral to Newham's Triage Service when there are complex needs or child protection concerns. We will use the Early Help and Safeguarding Thresholds to inform our decision making.

2.6 If a referral to Children's Triage has not met the threshold for targeted support or statutory intervention, the Designated Safeguarding Lead will make full written record of the decision and outcome. The school will continue to offer early help and interventions, supported by the use of the Early Help Record and Plan through the schools' pastoral teams.

2.7 Recognition and Response

- 2.8 Owing to the nature of the day-to-day relationship children in the Trust have with staff, all adults working in the school are particularly well placed to notice any physical, emotional or behavioural signs that a child may be suffering significant harm. We understand that harm means the ill-treatment or impairment of a child's health and/or development, including that caused as a result of witnessing the ill-treatment of another person and we understand that not all children will choose to talk, but may communicate through different ways. We will always be aware of and alert to any possible indicators that a child is suffering harm.

2.9 Types of abuse and neglect

Abuse: a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm. They may be abused by an adult or adults or another child or children.

Physical abuse: a form of abuse which may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.

Emotional abuse: the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

Sexual abuse: involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

Neglect: the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to: provide adequate food, clothing and shelter (including exclusion from home or abandonment); protect a child from physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate care-givers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

- 2.10 All staff will report any concerns to the Designated Safeguarding Lead for Early Help and Child protection.
- 2.11 All adults working in the Trust will receive regular Safeguarding training in order that their awareness to the possibility of a child suffering harm through physical abuse, emotional abuse, sexual abuse and neglect remains high.

2.12 We will ensure that the training our staff undertake contains opportunities for learning about those specific areas of child protection about which everyone working in education should be aware of and alert to:

- Child Missing from Education
- Child Sexual Exploitation (CSE) and see page 10
- Bullying including Cyberbullying
- Domestic Violence
- Drugs
- Fabricated or induced illness
- Faith Abuse
- Female Genital Mutilation (FGM) and see page 10
- Forced Marriage
- Gangs and Youth Violence
- Mental Health
- Private Fostering
- Preventing Radicalisation and see page 11
- Sexting and see <https://www.ceop.police.uk/Media-Centre/Press-releases/2009/What-does-sexting-mean/>
- Teenage Relationship Abuse
- Trafficking

3. Safeguarding – Providing a Safe Environment

3.1 All parents and carers of pupils attending schools in the Trust must feel secure in the knowledge that they are entrusting their children to adults who will strive to keep them safe at school. We will do this by:

- Promoting a caring, safe and positive environment within the school
- Ensuring that our staff are appropriately trained in safeguarding and child protection according to their role and responsibilities and keep a record of all training undertaken
- Ensure that our staff are fully inducted and comply with the school's staff behaviour/code of conduct policy.
- Encouraging the self-esteem and self-assertiveness of all pupils through the curriculum so that the children themselves become aware of danger and risk and what is acceptable behaviour and what is not and know who to turn to for help.
- Working in partnership with all other services and agencies involved in the safeguarding of children
- Displaying appropriate posters that detail contact numbers for child protection help-lines
- Always following Safer Recruitment procedures when appointing staff or volunteers to work in our school
- Welcoming visitors in a safe and secure manner
- Undertaking risk assessments when planning out of school activities or trips
- Ensuring that any community groups which use our premises for the provision of services to children have child protection knowledge and understanding evidenced by a policy or are prepared to adopt our own policy.

- Ensuring that all parents and carers know who to contact if they have any concerns.

4. Early Help, Safeguarding and Child Protection in Specific Circumstances

4.1 Attendance

We are aware that a pupil's unexplained absence from school could mean that they are at risk from harm.

- (1) We will always report an unexplained absence of a child with a Child Protection Plan or a Child in Need to the child's social worker within one day
- (2) We will always seek to clarify the reason for a child's absence from school with the child's parent or carer as soon as is practicable on the first day
- (3) We will always report a continued absence about which we have not been notified by the parent or carer to the Attendance Management Service if we have been unable to confirm the reasons for absence.
- (4) We will always report to the local authority the name of any child who has been newly registered to attend our school but does not arrive on the expected day.
- (5) We will always report to the Attendance Management Service the continued absence of a child known or thought to have been taken overseas if the child does not return to school on the expected return date.

4.2 Pupil Behaviour

We will always aim to maintain a safe and calm environment by expecting good behaviour from our pupils in line with our behaviour policy.

We are aware that any physical response from a member of staff to a pupil's poor behaviour could lead to a child protection concern being raised by the child or parent/carer.

- (1) No member of staff will use force when dealing with a pupil's breach of our behaviour policy unless the potential consequences of not physically intervening are sufficiently serious to justify such action
- (2) We will always record any occasion when physical intervention has been necessary
- (3) We will always notify parents or carers of any such incident

4.3 Bullying

We understand that bullying is harmful to children. We have an anti-bullying policy that sets out our aim of ensuring no child becomes a victim of bullying and the work that we carry out in school to foster an environment where bullying behaviour is known to be unacceptable. We will always take seriously any reports of bullying and respond appropriately.

We understand that bullying make take different forms and may include racist or homophobic behaviour. Any such reported or observed incident will be dealt with in accordance with our anti-bullying policy.

4.4 **Online Safety**

We recognise that children's use of the Internet is an important part of their education but that there are risks of harm associated with its use. We have an e-safety policy that addresses how we minimise those risks in school and teach children how to stay safe when using the internet in their lives out of school.

We also recognise that all members of staff and volunteers must always be mindful of the need to follow our policy of acceptable use of our IT equipment.

4.5 **Health & Safety**

We have a Health & Safety Policy which demonstrates the consideration we give to minimising any risk to the children when on the school premises and when undertaking activities out of school under the supervision of our staff.

4.6 **Child Sexual Exploitation (CSE)**

We recognise that child sexual exploitation (CSE) involves exploitative situations, contexts and relationships where young people receive something (for example food, accommodation, drugs, alcohol, gifts, money or in some cases simply affection) as a result of engaging in sexual activities.

We will consider the following CSE indicators:

- Sexual exploitation can take many forms ranging from the seemingly 'consensual' relationship where sex is exchanged for affection or gifts, to serious organised crime by gangs and groups.
- Perpetrator always holds some kind of power over the victim which increases as the exploitative relationship develops.
- Sexual exploitation involves varying degrees of coercion, intimidation or enticement, including unwanted pressure from peers to have sex, sexual bullying including cyberbullying and grooming.

However, it is also important to recognise that some young people who are being sexually exploited do not exhibit any external signs of this abuse.

4.7 **Female Genital Mutilation**

We recognise that there is a range of potential indicators that a girl or young woman may be at risk of FGM. We are aware that there is a Mandatory reporting duty since October 2015.

If staff have a concern they should follow local safeguarding procedures and local protocols for multi-agency liaison with police and children's social care. Further guidance is available through [Multi-Agency Practice Guidance](#) .

4.8 **Preventing Radicalisation**

The Trust is clear that extremism and radicalisation should be viewed as safeguarding concerns. We value freedom of speech and the expression of beliefs and both pupils/students and adults have the right to speak freely and voice their opinions.

- Extremism is views and actions that promote: 1) violence against others 2) hatred towards others 3) undermining the rights of others.
- Radicalisation refers to the process by which a person comes to support terrorism and forms of extremism.

There is no single way of identifying an individual who is likely to be susceptible to an extremist ideology. It can happen in many different ways and settings. Specific background factors may contribute to vulnerability which are often combined with specific influences such as family, friends or online, and with specific needs for which an extremist or terrorist group may appear to provide an answer. The internet and the use of social media in particular has become a major factor in the radicalisation of young people.

From 1 July 2015 schools are subject to a duty under section 26 of the Counter-Terrorism and Security Act 2015, in the exercise of their functions, to have “due regard to the need to prevent people from being drawn into terrorism”.

The statutory Prevent guidance summarises the requirements on schools in terms of four general themes: risk assessment, working in partnership, staff training and IT policies.

As with managing other safeguarding risks, staff should be alert to changes in children’s behaviour which could indicate they may be in need of help or protection. If staff have a concern they should follow local safeguarding procedures and local protocols for multi-agency liaison with police and children’s social care.

4.9 **Children who are particularly vulnerable**

The Trust recognises that some children are more vulnerable to abuse and neglect and that additional barriers exist when recognising abuse for some children.

We understand that this increase in risk is due more to societal attitudes and assumptions or child protection procedures which fail to acknowledge children’s diverse circumstances, rather than the individual child’s personality, impairment or circumstances.

In some cases possible indicators of abuse such as a child’s mood, behaviour or injury might be assumed to relate to the child’s impairment or disability rather than giving a cause for concern. Or a focus may be on the child’s disability, special educational needs or situation without consideration of the full picture.

Some children may also find it harder to disclose abuse due to communication barriers, lack of access to a trusted adult or not being aware that what they are experiencing is abuse.

To ensure that all children receive equal protection we will give special consideration to children who are;

- Disabled or have special educational needs
- Young carers
- Affected by parental substance misuse, domestic abuse or parental mental health needs
- Asylum seekers
- Living away from home
- Vulnerable to being bullied or engaged in bullying
- Already viewed as a 'problem'
- Living in temporary accommodation
- Live transient lifestyles
- Living in chaotic and unsupportive home situations
- Vulnerable to discrimination on the grounds of race, ethnicity, religion, disability or sexuality
- Do not have English as a first language.

And see <https://www.nspcc.org.uk/preventing-abuse/safeguarding/deaf-disabled-children/>

5. Working Together with Parents and Carers

5.1 Pupil Information

We recognise the importance of keeping up-to-date and accurate information about pupils. We will regularly ask all parents/carers to provide us with the following information and to notify us of any changes that occur.

- names and contact details of persons with whom the child normally lives
- names and contact details of all persons with parental responsibility
- emergency contact details
- details of any persons authorised to collect the child from school (if different from above)
- any relevant court orders in place including those which affect any person's access to the child (e.g. Residence Order, Contact Order, Care Order, Injunctions etc.)
- name and contact detail of G.P.
- any other factors which may impact on the safety and welfare of the child

5.2 Confidentiality

Information about pupils given to us by the children themselves, their parents or carers, or by other agencies will remain confidential. Staff will be given relevant and information only a "need to know" basis in order to support the child if that is necessary and appropriate.

We are, however, under a duty to share any information which is of a child protection nature. We understand that this is in the best interests of the child and overrides any other duties we have regarding confidentiality and information sharing.

We have a duty to keep any records which relate to child protection work undertaken by us or our partner agencies and to ensure that these are kept apart from the main pupil record, stored securely and only accessible to key members of staff. We also have a duty to send copies of these records to any school to which the pupil transfers.

5.3 **Referrals to partner agencies**

If we have a reason to be concerned about the welfare of a child we will always seek to discuss this with the child's parents or carers in the first instance. On occasion, according to the nature of our concern, it may be necessary for us to make an immediate referral to Children's Services when to do otherwise may put the child at risk of further harm either because of delay, or because of the actions of the parents or carers.

5.4 **Sharing our Policy**

This policy is available to all parents of pupils and prospective pupils via our website and can be made available by hard copy on request.

6. **ADULTS WORKING WITH CHILDREN**

6.1 **Safer Recruitment**

6.2 All staff and volunteers working with children in the Trust will be recruited safely:

6.3 **Preparation**

We will always consider the vacancy that has arisen within the context of safeguarding children and ensure that we include the responsibility to safeguard children within the requirements of the role.

We always consider carefully the knowledge skills and experience required to safeguard children and include these within a person specification.

6.4 **Advertising**

We will always advertise our vacancies in a manner that is likely to attract a wide range of applicants.

The advertisement will always include a statement about our commitment to safeguarding children and our expectation that all applicants will share that commitment.

The advertisement will state that the post is subject to a Disclosure and Barring check.

6.5 **Applications**

We will ensure that our application form enables us to gather information about the candidates' suitability to work with children by asking specific and direct questions.

We will scrutinise all completed application forms.

We will not accept CVs.

6.6 **References**

We will not accept open references or testimonials.

We will ask for the names of at least two referees.

We will take up references prior to interview and ask specific questions about the candidate's previous employment or experience of working with children.

We will follow up any vague or ambiguous statements.

6.7 **Interviews**

We will always conduct a face to face interview even when there is only one candidate.

Our interview panel will always contain at least one member trained in safer recruitment practice.

Our interview questions will seek to ensure we understand the candidate's values and beliefs that relate to children.

All candidates will be asked to bring original documents which confirm their identity, qualifications, and right to work.

6.8 **Appointments**

Our offer of appointment will be conditional on all requested checks having been returned as satisfactory; the Disclosure and Barring Service check and the Prohibited from Teaching check. This applies to all posts.

We will refer to the Disclosure and Barring Service any person whose checks reveal that they have sought work when barred from working with children.

6.9 **Volunteers**

We request and process DBS checks for volunteers. They are briefed about children protection; types of abuse and procedures to follow with concerns. Volunteers are also always supervised and never alone with children.

6.10 **Induction**

We will always provide newly appointed staff with appropriate guidance about safe working practice, boundaries and propriety and explain the consequences of not following the guidance.

6.11 **Continuing Professional Development**

We will ensure that all staff receive regular training in Child Protection.

6.12 **Supervision**

We will always supervise staff and act on any concerns that relate to the safeguarding of children.

6.13 **Allegations**

We will always follow our locally agreed procedures for the management of allegations against staff. The procedures are available at: [NSCB LADO](#).

If there is an allegation against one of the Head teachers in the Trust, the chair of the Local Governing Body and the CEP of the Trust must be informed and must work with the NSCB LADO to investigate.

If there is an allegation against the CEO of the Trust, the chair of the Trust must be informed and must work with the NSCB LADO to investigate.

6.14 **Dismissal**

We will always refer to the Disclosure and Barring Service any member of staff who is dismissed because of misconduct relating to a child.

6.15 **Safe Practice**

We understand that all adults working in or on behalf of the Trust have a duty to safeguard children and promote their welfare. We aim to provide a safe and supportive environment for our children through the relationship we have with them and their parents or carers and will always seek to ensure that all adults working in our school behave in a manner that fosters this relationship.

We will ensure that all staff are clear about the expectations we have of their behaviour towards all children and that any incident that falls below our expected standards will be dealt with appropriately.

Every three years, a DBS check will be carried out on all staff and recorded in the Single Central Record.

7. MONITORING AND REVIEWING OUR POLICY AND PRACTICE

7.1 Our Designated Leads for Safeguarding and Child Protection will continually monitor our child protection and safeguarding practices and bring to the notice of the Head teachers, Local Governing Bodies and the Trust Board any weaknesses or deficiencies.

7.2 The Local Governing Bodies have a duty to remedy any weaknesses that are identified.

7.3 An annual report will be submitted to the Local Governing Bodies, the Trust Board and the LCSB which will outline the child protection and safeguarding work that has been undertaken during the year. Names of children will not be shared. Included in the report will be details of:

- The names of members of staff with Designated Safeguarding Lead responsibilities
- Confirmation that all new staff and volunteers have been recruited safely and that a record of all staff vetting checks is up-to-date and complete
- The training that has been undertaken by the designated staff
- The training that has been undertaken by all other staff and volunteers
- Details of any incidents when physical restraint of pupils has been used
- Details of information and guidance that has been given to staff
- Details of safeguarding and child protection issues included in the curriculum

- Confirmation that all child protection records are stored securely and where appropriate have been transferred to another school
- Details of safeguarding and child protection information given to parents
- Details of the safety of the school site and the access given to visitors
- Confirmation that all school lettings have been agreed with consideration given to the safeguarding of children
- Numbers of child protection referrals made to Children's Services
- Details of child protection conferences or meetings attended regarding children (names of children are not shared)
- Numbers of children identified in need of early help support
- Numbers of child who have an Early Help Plan
- Numbers of children who are, or have been, subject to a Child in Need or Child Protection Plan

7.4 The Local Governing Bodies, the Trust Board, the Head teachers, the CEO and Designated Staff will work together on any aspect of Safeguarding and Child Protection that is identified as an area for development over the coming year.

7.5 Our Policy will be reviewed annually with the Trust Board.

7.6 This Policy was adopted in December 2016. It has been reviewed in September 2017. It will be reviewed in September 2018.

