



# SEND Policy

## **Vision**

**‘Love one another as Jesus loved us’ (John 13 v 34-35)**

**Jesus said, ‘Love one another as I have loved you’.**

**Through God’s love and our Christian Values, we encourage each individual to love, respect and value themselves and others.**

**We encourage and nurture the growth of every individual and their uniqueness so that all flourish and become all that they can be and all that God made them to be.**

***This policy sets out the procedures for Special Educational Needs and Disabilities (SEND) at St Mary’s CE Primary School and is to be reviewed annually.***

***To see how it looks in practice, please see the SEND information Report (Local Offer)***

***<https://www.stmaryscecrompton.oldham.sch.uk/page/send-local-offer/147387>***

## **Compliance**

This policy complies with the statutory requirements laid out in the 'Special educational needs and disability code of practice 0 - 25 years' (January 2015).

It has been written with reference to the following guidance and documents:

- Children and families act (2014)
- Equality act 2010: advice for schools (February 2013)
- Keeping Children Safe in Education (KCSIE)
- Schools SEN Information Report Regulations (2014)
- Special educational needs and disability code of practice: 0 - 25 (January 2015)
- Statutory guidance on supporting pupils with medical conditions (April 2014)
- Teachers standards (2012)
- The Early Years Foundation Stage (EYFS) framework
- The National Curriculum in England Key Stage 1 and 2 framework document (September 2013)
- Working Together to Safeguard Children (2018)

**This special educational needs and disabilities (SEND) policy should be used alongside and in conjunction with our policies on:**

- Accessibility Plan
- Admissions Policy
- Anti Bullying Policy
- Behaviour Policy
- Emotional and Mental Wellbeing Policy
- GDPR Policy
- Intimate Care Policy
- Medical Conditions Policy
- Oldham LA's Local Offer <https://oldhamsendlocaloffer.co.uk/>
- Safeguarding Policy
- SEND Information Report (Local Offer)

- Single Equality Policy (including Accessibility Plan)

In addition, this policy should also be used alongside and in conjunction with Oldham LA's local offer.

<https://oldhamsendlocaloffer.co.uk/>

School SEND Information	
SENDCo Lead	Mrs S Hepworth Contact Number : 0161 770 8309 <a href="mailto:info@stmarysccecrompton.oldham.sch.uk">info@stmarysccecrompton.oldham.sch.uk</a>
SENDCo Governor	Mrs G Croston Contact via the school office Contact Number : 0161 770 8309 <a href="mailto:info@stmarysccecrompton.oldham.sch.uk">info@stmarysccecrompton.oldham.sch.uk</a>

### **Values and Beliefs**

At St Mary's, we believe that all children are entitled to an education that consists of a broad and balanced curriculum and is appropriate to their needs, promotes high standards and the fulfilment of their potential. This should enable them to achieve the best possible educational and other outcomes and become confident young people with a growing ability to communicate their own views.

All teachers are teachers of children with SEND and every teacher is responsible for the progress of all children in their class, even where children access additional support from teaching assistants, mentors and specialist staff. Staff proactively identify pupils' differing needs and respond through high-quality, adaptive teaching and an ambitious, well-sequenced curriculum that enables all pupils to access learning and make strong progress.

We recognise that some children will need provision that is additional to and different from the universal offer. This constitutes special educational provision. At St Mary's we are committed to early identification of need and use our best endeavours to ensure that children with SEND receive high-quality, ambitious provision that removes barriers to learning and enables them to achieve well.

Our policy for SEND is based on the principles that underpin the SEND code of practice (2015):

1. A child with SEND will have their needs met.
2. The views, wishes and feelings of a child with SEND should be sought and taken into account as fully as possible and as appropriate to their age and understanding.
3. Parents/carers have an important role to play in supporting their child's education. Their views should be sought and taken into account.
4. Collaborative working should take place between all who are involved in securing the best outcomes for a child - including education, health and social care services.

### **Aims**

- ✓ To ensure that all children have access to a broad and balanced curriculum as appropriate to their needs.
- ✓ To ensure that all children have the opportunity to reach their full potential.
- ✓ To provide for the development of the whole child.

- ✓ To promote children's self-esteem and ensure that individual contributions are valued.
- ✓ To provide a happy, caring, safe and supportive environment, which is inclusive of the needs of all children.

### **Objectives**

- ✓ To provide all children with high quality teaching within a broad and balanced curriculum.
- ✓ To ensure the early identification of pupils with SEND.
- ✓ To ensure that provision is made for children with SEND so that they can make progress.
- ✓ To assess and monitor the effectiveness of this provision.
- ✓ To provide support and advice for staff working with children with SEND.
- ✓ To involve parents/carers in discussions about their child's progress.
- ✓ To work in partnership with outside agencies, to ensure the best possible provision for children with SEND, where necessary.
- ✓ To consider the views of the child.
- ✓ To work within the guidance provided in the SEND Code of Practice (January 2015).
- ✓ To liaise effectively with all those working with the child in the future to ensure that transitions are successful.

### **Definition of SEND:** (p15 - 16 SEND Code of Practice 2015)

- A child or young person has SEND if they have a learning difficulty or disability which calls for special educational provision to be made for him or her.
- A child of compulsory school age or a young person has a learning difficulty or disability if he or she has a significantly greater difficulty in learning than the majority of others of the same age, or has a disability which prevents or hinders him or her from making use of facilities of a kind generally provided for others of the same age in mainstream schools or mainstream post-16 institutions.

Under the SEND Code of Practice (2015) there are 4 areas of need :

### **Communication and interaction**

Children and young people with speech, language and communication needs (SLCN) may have difficulties in communicating with others. This may include challenges in expressing themselves, understanding what is said to them or using and understanding social rules of communication. The profile for every child with SLCN is unique and their needs may change over time. A child may have difficulty with one or several aspects of speech, language or social communication at different stages of their development. Children and young people with autism are likely to experience particular difficulties with social interaction. They may also face challenges with language, communication and imagination, which can impact on how they engage with others and with the learning environment.

### **Cognition and learning**

Support for learning difficulties may be required when children and young people learn at a slower pace than their peers, even with high-quality, adaptive teaching in place. Learning difficulties cover a broad range of needs, including moderate learning difficulties (MLD), severe learning difficulties (SLD), where pupils are likely to need support in all areas of the curriculum and may have associated difficulties with mobility or communication, through to profound and multiple learning difficulties (PMLD), where children have severe and complex learning needs alongside significant physical or sensory impairment.

Specific learning difficulties (SpLD) affect particular aspects of learning. This encompasses conditions such as dyslexia, dyscalculia and dyspraxia.

### **Social, emotional and mental health**

Children and young people may experience a wide range of social, emotional and mental health needs (SEMH) which can present in different ways. These may include becoming withdrawn or isolated, or displaying behaviours that challenge. Such behaviours may be a response to underlying needs or mental health difficulties, including anxiety, depression, self-harm, substance misuse, eating disorders or physical symptoms that are medically unexplained. Some children may have identified conditions such as attention deficit hyperactive disorder (ADHD) or attachment difficulties. It is important to recognise that behaviour is a form of communication and not all behavioural concerns are related to SEMH needs, they may reflect other underlying learning, communication or environmental factors.

### **Sensory and/or physical impairment**

Some children and young people require special educational provision because they have a disability which prevents or significantly hinders them from accessing the educational facilities generally provided. These needs may be present from birth, arise over time, or fluctuate depending on the child's circumstances.

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

Some children and young people with a physical disability (PD) require ongoing support, adaptations and equipment to ensure they can access all aspects of school life alongside their peers.

Children and young people with some health or disability conditions do not necessarily have SEND, but there is a significant overlap between disabled children and young people and those with SEND. Where a disabled child or young person requires special educational provision they will also be covered by the SEND definition (p16 Code of Practice 2015)

Identifying and assessing SEND for children or young people whose first language is not English requires particular care. Schools should establish whether lack of progress is due to limitations in their command of English or if it arises from SEN or a disability. Difficulties related solely to limitations in English as an additional language are not SEND. (Code of Practice 6.24)

**Identification of Pupils with SEND**  
We recognise the importance of identifying children with SEND at the earliest possible point and ensuring that effective provision is made to remove barriers to learning and support long term outcomes. Early identification is rooted in high-quality, inclusive classroom practice and ongoing assessment.

Children with SEND may be identified in a number of ways:

- Through class teacher's observations and assessments, in consultation with the SENDCo, where progress concerns persist despite high-quality, adaptive teaching.
- Discussion with parents and carers, ensuring that their insights and concerns contribute to the assessment process.
- Information from previous settings or external agencies, e.g. pre-school settings, previous schools, and health professionals
- Pupil voice, where the child expresses concerns about their learning, emotional well-being or access to the curriculum.

## **A Graduated Response to SEND Support**

All teachers are teachers of children with special educational needs and are responsible and accountable for the progress and development of all children in their class, including those who receive support from teaching assistants or specialist staff. High-quality, inclusive teaching, supported by adaptive approaches, well-sequenced learning and ongoing assessment, forms the foundation of our response to meeting diverse needs.

Within every classroom, teaching and learning follows a continuous cycle of planning, teaching and assessment that responds to pupils' differing abilities, aptitudes and interests. While most pupils make progress through this universal offer, some may require additional support where their attainment or progress differs significantly from age related expectation.

Early identification is essential. In line with the SEND Code of Practice, we use a graduated response, following the Assess, Plan, Do, Review cycle, to identify needs, remove barriers to learning and ensure appropriate provision is in place.

### **Stage 1: Initial Concerns**

When a child continues to make less than expected progress despite high-quality, inclusive teaching and targeted, adaptive support, the class teacher will work with the school's SENDCo to explore emerging needs. Staff will refer to guidance in Oldham Graduated Response Toolkit to support decision making.

[www.oldham.gov.uk/grt](http://www.oldham.gov.uk/grt)

When considering if a child has SEND any of the following may be evident:

- Continued limited progress despite high-quality, adaptive teaching and targeted support.
- A significantly greater difficulty in learning than the majority of children of the same age.
- Persistent social, emotional or behavioural needs that impact the child's learning or the learning of others and are not explained by unmet needs or environmental factors.
- A disability or health condition that prevents or hinders the child from accessing the educational facilities normally available for pupils of the same age.
- A disability or health condition that requires specialist equipment, adaptations or ongoing support from external professionals.

### **Stage 2: Monitoring (Cause for Concern)**

Where initial concerns have been identified, the class teacher will discuss these with the SENDCo. The class teacher will speak to the child's parents at the earliest opportunity to share concerns, gather the child's and parents' views, and agree the next steps. A 'Cause for Concern' form will be completed and stored in the pupil's file. Pupils at this stage are placed on the school's Monitoring Register by the SENDCo.

Any interventions, either as a small group or as an individual will be recorded and monitored following the assess, plan, do, review cycle. This will include any history of interventions including records of baseline and impact of interventions used.

All pupils requiring adjustments to classroom practice to support their inclusion will be recorded on the class provision maps.

### **Stage 3: SEND Support (without external agencies)**

If a child continues to make less than expected progress, despite high-quality, inclusive teaching, adaptive approaches and targeted interventions, they may be identified as requiring SEND Support and

placed on the school's SEND register. This decision is made carefully and in full partnership with parents and carers. Parents are informed at every stage, and their views are central to decision making. Prior to being placed on the SEND register, the class teacher will have implemented a sustained cycle of assessment, planning, targeted teaching and review. The cycle of assess, plan, do and review will continue to be recorded in a SEN Support Plan. Progress and provision are reviewed with parents/carers at least termly. A person centred review **may** be organised by the SENDCo to which all professionals working with the child, their parents/carers and the child themselves (where appropriate) will be invited to attend. This ensures a holistic understanding of need and supports planning that removes barriers to learning and promotes strong progress.

#### **Stage 4: SEND Support (with external agencies)**

Where a child continues to make less than expected progress and/or is working significantly below age-related expectations despite sustained support / targeted interventions matched to their needs, it will be necessary to seek assessment by and/or advice from an external professional or specialist teachers.

Examples of external and specialist services include, but are not limited to:

- Advisory teachers from the QEST Team
- Educational and Child Psychology Service
- Child and Adolescent Mental Health Service (CAMHS)
- Community Paediatrics
- Sensory and Physical Support Services (SAPSS)
- Occupational Therapy
- Speech and Language Therapy
- Early Help services
- Mental Health in Education Team

Some external agencies require a separate consent form to be signed by the child's parent/carer. The SENDCo will advise when this is needed. Any advice provided by external professionals will be shared with all relevant staff and used to inform the child's targets, provision and next steps within the Assess, Plan, Do, Review cycle. A person centred review **will** be organised by the SENDCo, bringing together the child (where appropriate), parents/carers and external professionals.

#### **Stage 5: School Request for an Education, Health and Care Plan**

An EHCP is a legal document which describes a child or young person's (aged up to 25 years old) special educational needs, the support they need, and the outcomes they would like to achieve.

A child will be considered for a request for EHC assessment if:

- despite the school having taken relevant and purposeful action through the graduated response to identify and meet the needs of a child they have not made adequate progress;
- despite acting on advice of outside agencies and working on specific targets, following the plan, do and review cycle the pupil still does not make adequate progress;
- the pupil's needs are severe and/or complex.

Where a request for a statutory assessment is made by the school to the LA, the child will have demonstrated a significant cause for concern. The LA will request information about the child's progress over time and will also need documentation in relation to the child's special educational needs and any action taken to deal with those needs, including resources and/or special arrangements put in place.

This information will include:

- Pupil Centered Review information and action plans for the pupil
- Evidence of sustained and purposeful cycles of assess, plan do and review
- Details of interventions (including baseline information)
- The pupil's health background including the child's medical history where relevant
- Evidence of the child's attainment levels - current and over time
- Evidence of progress over time
- Educational and other assessments - advice from an external agency must be present
- Views of the parents of the child
- Views of the child
- Involvement of other professionals such as health or social services

Parents/carers may also choose to initiate a request for an Education, Health Care Plan.

Statutory assessment involves consideration by the LA, working co-operatively with parents, the school and other agencies, as to whether a statutory assessment of the child's special educational needs is necessary.

### **Stage 6: Education, Health Care Plan**

If an EHCP assessment is accepted by the LA and it is agreed to produce a draft plan, an Education, Health and Care Plan (EHCP) will include:

- The pupil's name, address and date of birth;
- Details of all of the pupils special needs and abilities;
- The special educational provision necessary to meet the pupil's needs;
- The expected outcomes for the child;
- The type and name of the school where the provision is to be made;
- Relevant non-educational needs of the child including health and social care needs;

All children with EHC Plans will have short-term targets set for them in an action plan and school related actions will be implemented, where possible, in the normal classroom setting. The delivery of the interventions will be the responsibility of the class teacher.

All EHC Plans must be reviewed annually with parents, the pupil, the LA, the school and professionals to consider whether any amendments need to be made to the description of the pupil's needs.

### **Criteria for exiting SEND register**

If a child with SEND makes sufficient and sustained progress in their area of identified need(s), so that they no longer require provision that is different from or additional to what is normally available to a child of their age through high quality teaching, they will no longer be seen as requiring SEND support and may be removed from the SEND register.

### **Supporting pupils and families**

Oldham LA's Local Offer is an online resource that details services, support and guidance available to children and young people with SEND ages between 0 - 25 and their families. The link to the LA Local Offer can be found on the school websites and is available here:



<https://oldhamsendlocaloffer.co.uk/>

On our school website a SEND information report (Local Offer)

<https://www.stmaryscecrompton.oldham.sch.uk/page/send-local-offer/147387>

In addition there are outside agencies such as 'POINT', who can provide additional support to parents/carers of children with SEND. Further information can be found here at <https://www.point-send.co.uk/>

### **Admissions**

St Mary's is an inclusive school. We have high expectations for all our children whatever their ability or needs. We aim to achieve this through the removal of barriers to learning and participation. We want all our children to feel that they are a valued part of our Christian school community.

Through our ethos and curricular provision, we respect and acknowledge that children:

- have different educational and behavioural needs and aspirations;
- require different strategies for learning;
- acquire, assimilate and communicate information at different rates;
- need a range of different teaching approaches and experiences.

St Mary's does not discriminate against children with special educational needs and/or disabilities and welcomes applications for admission from all children, in line with the Equality Act 2010 and the SEND Code of Practice.

St Mary's admissions criteria details can be found on the school website or by following this link:

<https://www.stmaryscecrompton.oldham.sch.uk/page/admissions/147382>

### **Supporting Children at School with Medical Conditions**

At St Mary's, we recognise that children with medical conditions should be properly supported to have access to education, including school trips and physical education. Teachers will ensure that appropriate provision is made for the child.

St Mary's School has policies on medical procedures and on asthma, which can be accessed through the school website or via the school office. Where children have a significant medical and healthcare need requiring additional provision, they will have a Health Care Plan, which details the child's medical condition and the provision that needs to be made for them.

Some children with medical needs as well as SEND may have an EHCP, which brings together their health needs and special provision.

### **Monitoring and Evaluating**

At St Mary's, we regularly and carefully monitor and evaluate the quality of the provision we offer for all pupils.

The SENDCo completes regular monitoring to track the SEND pupils to ensure progress is being made. Examples of monitoring completed includes:

- Termly review meetings
- Provision Map monitoring (termly)
- TA Observations and quality of interventions (at least annually)

- Outcomes of Pupil Progress (termly)
- Staff views
- Pupil views
- Parent views
- SEND Governor views

The evaluation and monitoring arrangements promote an active process of continual review and improvement of provision for all pupils.

### **Transition Arrangements:**

#### **Children transferring to St Mary's CE Primary School:**

When children with SEND are admitted into school or transfer from another school, every effort is made to ensure the relevant information is received as quickly as possible. Sometimes children join us who were not on the SEND Register at their previous school. In these cases, we monitor their progress closely before inviting their parents into school to discuss next steps.

#### **Children joining us in Reception:**

Children entering our Reception class will have the opportunity to visit school in the summer term.

The SENDCo and / or Reception class teacher attend pre-school review meetings in the summer term before children join our Reception class so that necessary measures can be put in place. If necessary, we also liaise with relevant outside agencies before they start e.g. Health Visitors / Early Years Team.

#### **Children transferring to another school:**

For children moving on to a new school, individual SEND information will be passed on to the receiving school.

#### **Transition to secondary school:**

When Year 6 children transfer to secondary school, a review meeting will be set up in the summer term to discuss transition arrangements. The child's parents, class teacher, secondary school Transition Officer and if necessary, relevant outside agencies are invited.

### **Training and Resources:**

In order to maintain and develop the quality of teaching and provision to respond to the strengths and needs of all pupils, staff are encouraged to undertake relevant training and development.

The training needs of staff are identified and planned through the process of observations and through the needs of the children in their class. All staff attend regular staff meetings where issues and training about high quality teaching can be addressed.

The SENDCo regularly attends local authority SENDCo Development Days, in order to keep up to date with local and national initiatives in SEND. The SENDCo also meets with other SENDCo's in the local area as part of a collaborative network.

### **Roles & Responsibilities**

Provision for children with SEND is a whole school matter. In addition to the governing body, the head teacher and the SENDCo, this policy applies to all members of staff: both teaching and support staff in their day-to-day responsibilities.

### **SEND Governor**

The named Governor for SEND (Gemma Croston - contact details available from the school office) will ensure:

- the necessary provision is made for any pupil who has SEND
- all staff in school are aware of the importance of identifying and providing for those children with SEND
- pupils with SEND. have the opportunity to participate in school activities, together with those pupils who do not, as far as is reasonably practical and compatible with the needs of all the children
- they have regard to the Code of Practice (2015) when carrying out duties towards all pupils with SEND and meet with the SENDCo at least annually
- parents are notified if the school decides to make SEND provision for their child
- school provides an information report for parents on the school website
- they raise awareness of SEND issues at Governing Board meetings

### **The Headteacher**

The Headteacher (Pamela Hartley) will:

- Work with the SENDCo and the SEND Governor to determine the strategic development to meet pupils' needs effectively
- Have overall responsibility for the provision and progress of learners with SEND
- Be responsible for the management of all aspects of the school's work, including provision for pupils with Special Educational Needs
- Keep the governing body informed about SEND issues
- Working closely with the SENDCo
- Monitor and report to governors about the implementation of the schools' SEND policy and the effects of inclusion policies on the school as a whole

### **The SENDCo**

The SENDCo (Susanna Hepworth) is responsible for:

- Working with the Headteacher and SEND Governor to determine the strategic development of the SEND policy and provision in the school. (SEND Files, Impact and quality of interventions, progress of SEND pupils)
- Having day-to-day responsibility for the operation of this SEND policy and the co-ordination of specific provision made to support individual pupils with SEND, including those with EHC Plans
- Providing professional guidance to colleagues and work with staff, parents and other agencies to ensure that pupils/young people with SEND receive appropriate support and high quality teaching
- Advising on the graduated approach to providing SEND support
- Evaluate process and practice to improve outcomes
- Being the point of contact for external agencies
- Liaising with potential next providers of education to ensure pupils/young people and their parents are informed about options and a smooth transition is planned
- Assisting in the monitoring and evaluation of progress of pupils with SEND through the use of existing school assessment information, e.g. class-based assessments/records, end of year tests, SATs, etc.
- Maintain the Monitoring register and SEND Register
- Ensuring the school keeps the records of all pupils with SEND up to date
- Liaising closely with parents of pupils with SEND alongside class teachers
- Overseeing the records of all children with special educational needs

- Liaising closely with parents of pupils with SEND alongside class teachers, so that they are aware of the strategies that are being used and are involved as partners in the process
- Managing the school-based assessment and completing the documentation required by outside agencies and the LA
- Managing a range of resources, human and material, to enable appropriate provision for children with special educational needs
- Working with the Headteacher and the Governing Board to ensure that the school meets its responsibilities under the Equality Act 2010 with regard to reasonable adjustments and access arrangements
- Attending relevant meetings and training to further develop the role of SENDCo
- Contributing to the in-service training of staff
- Update the SEND Policy and School Local offer on an annual basis
- Present a SEND report to Governors annually

### **Class Teachers**

Class Teachers are responsible for:

- The progress and development of every pupil in their class through high quality teaching
- Identifying children with SEND in their care and bringing them to the attention of the SENDCo
- Adapting the curriculum to meet the needs of individuals and groups of children
- Working with the SENDCo to review each pupil's progress and development and decide any changes to provision
- Ensuring all documentation is up to date and evaluated
- Updating provision maps/timetables termly
- Planning work for the TAs working with a child(ren) in their class, including liaising with TAs to prepare next steps for learning
- Preparing notes ready for review meetings
- Being involved in the preparation of reports for referrals to outside services
- Informing the SENDCo of progress, any growing concerns and requests for further intervention by outside agencies
- Keeping a log of visits by outside agencies (eg. observations) and appointments attended by individual children
- Directly liaising with parents of children with SEND
- Ensuring that their class SEND files, pupil SEND files and SEN Support Plans are kept updated
- Making themselves aware of the school's SEND policy and procedures for identification, monitoring and supporting pupils with SEND

### **Teaching Assistants**

TAs should:

- Be fully aware of the schools' SEND policy and the procedures for identifying, assessing and making provision for pupils with SEND
- Use the school's procedure for giving feedback to teachers about pupils' progress
- Work as part of a team with the SENDCo and the teachers supporting pupils' individual needs and ensuring inclusion of pupils with SEND within the class
- Play an important role in implementing SEN Support Plans and monitoring progress.

### **Complaints**

Complaints will be dealt with in accordance with the Complaints Policy and procedures. The policy can be found on the school website or requested at the school office.

### **Accessibility**

St Mary's School has an 'Equality of duty' policy. We have wheelchair access using ramps and the availability of a stair lift should this be required. We have two disabled toilet provisions, one with a ceiling hoist and bed.

Reasonable adjustments are made for pupils in regards to curriculum, communication and participation.

### **Dealing with bullying**

St Mary's is an inclusive school and steps are taken to ensure and mitigate the risk of bullying of all pupils including those who are vulnerable at our school. Please see the anti-bullying policy and guidance, which is available on the schools' website.

### **Data Protection (GDPR): Storage and Management of Information**

The procedures and practice created by this policy have been reviewed in the light of our Data Protection Policy.

All documents stored are in accordance with legal requirements where appropriate, and guidance from the Records Management Toolkit for Schools.

Each child's primary school record is retained for the length of time that the child remains at the school. Essential information such as attendance, medical records, unique pupil number, external data etc. is transferred onto the next school as they leave. Any information stored on the office computer system is archived.

Each class teacher has a class SEND file with information relevant to the needs of that child. SEND pupil files are retained by the school for the DoB of the child +25 years.

**This policy:**

<b>Has Few / No Data Compliance Requirements</b>	<b>Has A Moderate Level of Data Compliance Requirements</b>	<b>Has a High Level Of Data Compliance Requirements</b>