DECISION-MAKER:	CHILDREN AND FAMILIES SCRUTINY PANEL
SUBJECT:	SCHOOL STANDARDS
DATE OF DECISION:	17TH DECEMBER 2015
REPORT OF:	CABINET MEMBER FOR EDUCATION AND CHILDREN'S SOCIAL CARE

CONTACT DETAILS

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STATEMENT OF CONFIDENTIALITY

None

BRIEF SUMMARY

The paper aims to provide an update on the activity undertaken by Education and Early Years with particular reference to the questions raised by the Chair of the Scrutiny Panel in relation to:

- School Standards in Southampton (with particular reference to Key Stage 4 results in the city)
- The role of the local authority in working with failing schools
- The role of the Virtual school and how it supports our Looked After Children.

RECOMMENDATIONS:

	(i)	That the Panel discuss school standards in Southampton, noting the Key Stage 4 results contained within the report and the work of the School Improvement Team and Virtual School in support of schools (including intervention in failing schools).

REASONS FOR REPORT RECOMMENDATIONS

1.	To enable a discussion with the Cabinet Member and officers on school standards in Southampton.

ALTERNATIVE OPTIONS CONSIDERED AND REJECTED

2.	None.

DETAIL (Including consultation carried out)

|	**School Standards in Southampton - The role of Southampton City Council**
3.	Historically the LA managed all state schools in its area and controlled what schools did. The LA was responsible for each school's budget, appointed school staff, set the curriculum and undertook school inspection. However, the role of the LA is now profoundly different; legislation has led to a diminishing role for Local Authorities and the educational landscape is shifting to a school-led system where school leaders are directly overseeing the running of their schools.

4.	Schools are now responsible for the majority of the running of their schools (held to account by their Governing Body), engaging with the LA when in receipt of our statutory obligations and the purchasing of services. With the current government advocating a drive towards academies and free schools, the LA only has a direct relationship with maintained schools.
5.	In Southampton we have 45 maintained schools, 21 Academies, 5 Special, 1 Special Free School, 1 PRU and 1 Alternative Provision Academy. Statutory provision currently includes: • Admissions • School place planning (building or extending schools) • Home to school transport • Support services (Educational Welfare, Educational Psychologists, School Improvement) • Allocation of finance.
6.	The government is seeking to reduce the Local Authority role still further and will consult on its proposals in 2016. Furthermore, available funding is likely to diminish with the Education Services Grant due to be cut nationally by £600m and a new funding formula for schools, high needs and Early Years introduced in 2017/18 in an attempt to address the current disparity in per pupil funding rates.
7.	Other changes to the education system include a new Ofsted inspection framework which, in addition to safeguarding, focusses on four key judgments from Early Years Foundation Stage to Key Stage 4: • Effectiveness of leadership and management • Governance • Teaching, learning and assessment • Personal development, behaviour and welfare.
8.	Furthermore, the Education and Adoption Bill will soon become legislation. This will mean that failing and coasting schools may well be required to become academies, removing the role of the LA, but in some cases resulting in LAs becoming responsible for assuming responsibility for any budget deficit.
9.	Currently Southampton employs a small School Improvement team (2 FTE Primary, 0.6 FTE secondary and 1 FTE Governance and Leadership Adviser, with 0.4FTE of that time seconded to Springwell Teaching School). This team are in direct contact with all maintained schools and some academies, with targeted support undertaken on a needs analysis basis. The team's key remit is to promote high standards and undertake a support/challenge role with senior leaders and their Chair of Governors.
10.	Southampton place a high value on partnership working and collaboration with schools and system leaders. Key vehicles for school improvement activity undertaken by Southampton LA are: • **School Moderation Group (SMG)** - Chaired by PO for Education and Early Years and attended by School Improvement team. The core function is to agree a categorisation for all maintained schools, with a view to sharing this info with Headteachers as part of the

	support/challenge function.
	• **Southampton School Improvement Group** (SSIG) - Chaired by PO for Education and Early Years and attended by LA officials, Chairs of Heads and Executive Leads for the city's Teaching Schools. The aim of the group is to identify and agree collaborative support for schools across the partners, based on the outcomes of the SMG.
11.	In addition, the LA engages proactively with the Chairs of Heads, Teaching Schools, School Business Manager Network and the Secondary Education Forum.
12.	The Director of Children Services, on behalf of Southampton City Council, maintains a leadership role across the whole education system with engagement with external partners and system leaders a key priority.
	Exam Results
13.	The DfE issued a provisional release on the 15/10/2015, based on provisional GCSE and equivalent results in England.
14.	**Key headlines from the data**:
	• 49.6% of Southampton pupils achieved 5+ A*-C including English and Maths GCSE in 2015 achieving a rank of 129th out of 151 Local Authorities. Nationally 56.3% of pupils achieved 5+ A*-C including English and Maths GCSE leading to a gap of 6.7% to Southampton (49.6%). Southampton's performance decreased from 51.0% in 2014 to 49.6% in 2015, a 1.4% decline. Nationally there has also been a decline of 0.3% from 56.6% in 2014 to 56.3% in 2015.
	• 68% of Southampton pupils achieved 3 levels of progress in English compared to 70% nationally, a gap of 2%. Southampton's performance has regressed by 6.9% from 74.9% in 2014 to 68% in 2015. In comparison, National performance decreased by 1.6% from 71.6% in 2014 to 70% in 2015. Southampton outperformed National by 3.3% in 2014 compared to a gap of 2% in 2015. Southampton's ranking decreased from 41st in 2014 to 92nd in 2015.
	• 61% of Southampton pupils achieved 3 levels of progress in Maths compared to 67% nationally, a gap of 6%. Southampton achieved a ranking of 125th out of 149 Local Authorities. Southampton's performance declined between 2014 and 2015 by 1.2% (62.2% in 2014 - 61% in 2015) against a National increase of 1.5% (65.5% in 2014 - 67% in 2015) leading to a widening of the gap (6%) between Southampton (61%) and National (67%).
	• 20.4% of Southampton pupils achieved the EBacc in 2015 compared to 24.0% nationally, resulting in a rank of 110th for Southampton. Southampton's performance 20.4% was a 2.4% increase on 2014 (18.0%) compared to a National decrease of 0.2% between 2014 (24.2%) and 2015 (24.0%). Southampton have therefore reduced the gap to National from 6.2% in 2014 (Southampton 18.0% - National 24.2%) to 3.6% in 2015 (Southampton 20.4% - National 24.0%).

% 5+ A*-C including English and Maths

	2011	2012	2013	2014	2015
Southampton	52%	54%	58%	51%	50%
Statistical Neighbours	53%	56%	56%	54%	52%
Core Cities	52%	55%	55%	52%	51%
National	58%	59%	61%	57%	56%
Gap Southampton vs Statistical Neighbours	-2%	-1%	2%	-3%	-2%
Gap Southampton vs Core Cities	-1%	0%	3%	-1%	-1%
Gap Southampton vs National	-7%	-5%	-3%	-6%	-6%
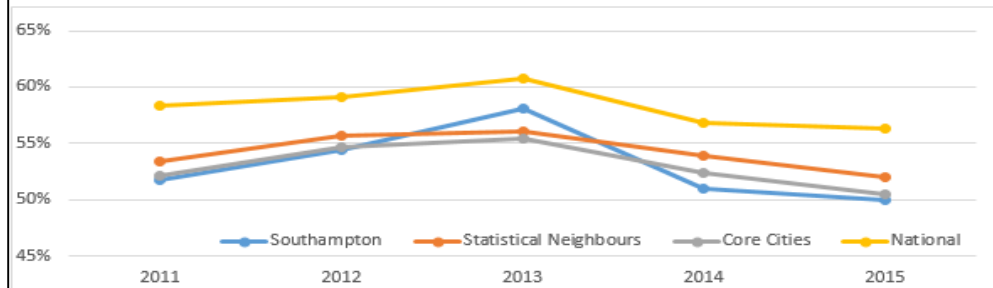
KS4 Percentage achieving English Baccalaureate

	2011	2012	2013	2014	2015
Southampton	7%	9%	17%	18%	20%
Statistical Neighbours	13%	14%	20%	22%	21%
Core Cities	12%	13%	19%	22%	22%
National	15%	16%	23%	24%	24%
Gap Southampton vs Statistical Neighbours	-6%	-5%	-3%	-4%	0%
Gap Southampton vs Core Cities	-5%	-4%	-3%	-4%	-1%
Gap Southampton vs National	-8%	-7%	-6%	-6%	-4%

Key Stage 2 - Key Stage 4 3 Levels of Progress English

	2011	2012	2013	2014	2015
Southampton	67%	68%	72%	75%	68%
Statistical Neighbours	68%	67%	68%	71%	68%
Core Cities	67%	66%	67%	69%	66%
National	72%	68%	71%	72%	70%
Gap Southampton vs Statistical Neighbours	-1%	0%	4%	4%	0%
Gap Southampton vs Core Cities	0%	2%	5%	6%	2%
Gap Southampton vs National	-5%	-1%	1%	3%	-2%
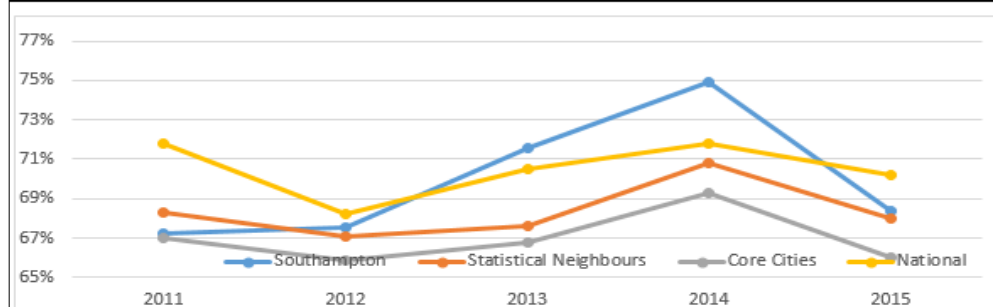
Key Stage 2 - Key Stage 4 3 Levels of Progress Maths

	2011	2012	2013	2014	2015
Southampton	59%	66%	69%	62%	61%
Statistical Neighbours	60%	64%	66%	62%	64%
Core Cities	58%	64%	65%	61%	61%
National	65%	69%	71%	66%	67%
Gap Southampton vs Statistical Neighbours	-1%	2%	3%	0%	-3%
Gap Southampton vs Core Cities	1%	2%	4%	1%	-1%
Gap Southampton vs National	-6%	-3%	-2%	-3%	-6%
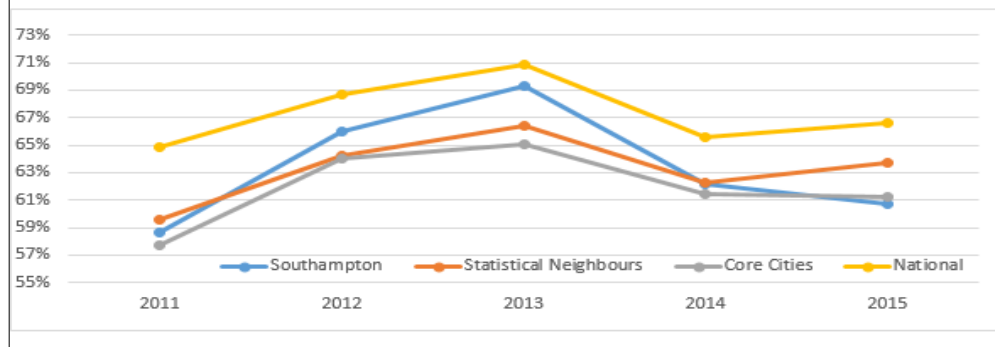
- Southampton achieved its highest ever English Baccalaureate (EBacc) pass rate of 20.4% securing a National rank of 110th out of 149 Local Authorities. The gap between Southampton 20.4% and the Statistical Neighbour (20.8%) average was just 0.4% in 2015 for the EBacc. A challenge remains as Southampton's EBacc performance was 1.1% and 3.6% below the Core City (21.5%) and National average (24.0%).

- Southampton's 5+ A*-C including English and Maths performance (49.6%) sustained its 2014 National rank of 129th against 151 other Local Authorities.

- The proportion of Southampton pupils achieving the expected level of progress (3 levels) in English (68%) was in line with the Statistical Neighbour average (68%) and 2% above the Core City average (66%).

	Areas to improve on
15.	- Southampton's 5+ A*-C including English and Maths performance (49.6%) was 2.4% and 6.7% below the Statistical Neighbour average (52.0%) and the National average (56.3%) respectively.

- The proportion of Southampton pupils achieving the expected level of progress (3 levels) in Maths (61%) was 3% below the Statistical Neighbour average (64%) in 2015.

- The proportion of Southampton pupils achieving A*-C English GCSE was 62.1%. This is 1.0% below the Core City average (63.1%), 2.4% below the Statistical Neighbour average (64.5%) and 6.2% below the National (68.3%). Southampton achieved a National rank of 132nd out of 151 Local Authorities.

- The proportion of Southampton pupils achieving A*-C Maths GCSE was 61.1%. This is 1.6% below the Core City average (62.7%), 3.6% below the Statistical Neighbour average (64.7%) and 7.0% below the National |

	(68.1%). Southampton achieved a National rank of 138th out of 151 Local Authorities.

• The proportion of Southampton pupils achieving A*-C Science GCSE was 59.7%. This is 7.7% below the Core City average (67.4%), 6.4% below the Statistical Neighbour average (66.1%) and 9.2% below the National (68.9%). Southampton achieved a National rank of 144th out of 151 Local Authorities.

• The proportion of Southampton pupils achieving A*-C History and Geography GCSE was 60.2%. This is 3.1% below the Core City average (63.3%), 5.3% below the Statistical Neighbour average (65.5%) and 6.7% below the National (66.9%). Southampton achieved a National rank of 133rd out of 151 Local Authorities.

• The proportion of Southampton pupils achieving A*-C in a Language GCSE was 62.3%. This is 4.1% below the Core City average (66.4%), 5.6% below the Statistical Neighbour average (67.9%) and 7.6% below the National (69.9%). Southampton achieved a National rank of 130th out of 149 Local Authorities.

• The average capped points score in Southampton (296.0) was 15.6 points below the National average of 311.6. This indicates that Southampton pupils achieved more than a grade less in 2 of their best 8 subjects than the National average. |
| 16. | Data for each Southampton Secondary School can be seen in Appendix 1. Summary of contact that has taken place between SCC and Secondary Schools regarding performance for Academic Year 2015 is detailed in Appendix 2. |
| | **School Improvement Inspections** |
| 17. | At the end of the summer term 2015, Southampton's inspection outcomes compares favourably to the national position. 84% of Southampton's school have been judged as good or outstanding compared to the national position of 78%:

• 82% of Southampton's young people are currently attending good or outstanding schools.

	All	Primary	Secondary
% of Southampton Schools Outstanding/Good	84%	85%	75%
% of pupils attending Southampton Schools Outstanding/Good	82%	82%	82%
England % of pupils attending Outstanding/Good Schools (as at **31/8/14**)	78%	81%	74%
18.	In September 2015, Ofsted implemented far-reaching changes to the way it

	inspects early years provision, schools and further education and skills. These included:
	- The introduction of a common inspection framework for all early years settings on the Early Years Register, maintained schools and academies, non-association independent schools and further education and skills providers (deemed a Section 5 inspection); - Short inspections for maintained schools, academies and further education and skills providers that were judged good at their last full inspection. These short inspections will be conducted approximately every 3 years (deemed a Section 8 inspection); - Significant changes to Ofsted's inspection workforce. From September 2015, Ofsted contracted directly with inspectors for maintained schools, academies, non-association independent schools and further education and skills inspections.
19.	Under the new framework, one Southampton school has been inspected. The report has not yet been published and therefore the outcome remains confidential.
20.	Based on the previous inspection date, 25 primary and 7 secondary schools are anticipating a Section 8 inspection this academic year. This means inspectors will visit for 1 day, to assess if the school continues to be 'good' and to ensure the effectiveness of the safeguarding. If the evidence indicates the school to be outstanding or less than good, the inspection will be then deemed a Section 5 inspection.
21.	5 primary schools and 1 secondary school are due for a Section 5 inspection this academic year. The increased challenge of the new inspection framework means that maintaining good for a significant number of schools will be challenging. The School Improvement Team are working with all the identified schools. However, it is anticipated that the overall percentage of good schools is likely to reduce and as a consequence compare less favourably to the national. This reflects the declining outcomes within the city (as outlined in the DfE data).
22.	The Local Authority continues to draw on a range of strategies to support schools and to improve pupil outcomes. For example, supporting partnership and collaboration which includes strengthening existing partnerships such as locality collaboration and working with our Teaching School Alliances. The impact of the school improvement is then evaluated regularly through a rigorous and transparent monitoring process based upon robust data and communication.
	Coasting Schools
23.	The DfE has consulted on Intervening in failing, underperforming and coasting schools. This is a major revision of the May 2014, revised January 2015, 'Schools Causing Concern' guidance. The draft new guidance is Schools Causing Concern: Intervening in failing, underperforming and coasting schools: Guidance for local authorities and RSCs.
24.	'Coasting' is defined in terms of performance over three years with respect to headline outcomes and progress. The Regional Schools Commissioner

25. RSCs will interact with coasting schools, including making decisions about which schools to intervene in, and what, if any, interventions will be necessary. The options are:

- no further action at this stage
- providing additional support and challenge
- requiring the governing body to 'enter into arrangements'
- appointing additional governors or an IEB
- making an academy order.

26. RSCs will have significant discretion, and could, for example, decide not to intervene where a coasting school is supporting its pupils well, but has fallen within the coasting definition because of its circumstances or pupil characteristics. In making decisions, RSCs will look carefully at school factors which might have an effect on the underlying data, for instance the presence of a large SEN unit.

27. There are a number of Southampton schools (primary and secondary) which have been identified 'at risk' of meeting the coasting criteria (see table below). The measure by which schools will be judged at the end of Key Stage 2 will change in 2016. A scaled score of 100 will represent the 'national standard' (broadly equivalent to the higher attainment of Level 4b+). A school's progress score will be calculated by comparing their pupils' Key Stage 2 results against those of all pupils nationally who had similar starting points.

KS4 Schools identified as at risk of been defined as 'coasting' in 2015										
	5+ A*-C Inc English & Maths		Below 60% both years	2013			2014			Below attainment in 2013 & 2014
	2013	2014		English 3LP	Maths 3LP	Below 2013	English 3LP	Maths 3LP	Below 2014	
Bitterne Park School	71%	65%		84.0	75.6		83.2	72.0		
Cantell Maths and Computing College	69%	51%		88.4	73.5		94.9	68.5		
Chamberlayne College for the Arts	60%	61%		73.9	69.6		68.1	64.9		
Inspire Enterprise Academy	NA	10%					66.7	22.2		
Oasis Academy Lord's Hill	38%	45%		63.2	71.4		69.7	70.8		
Oasis Academy Mayfield	43%	38%		47.6	66.9		66.4	61.4		
Redbridge Community School	52%	37%		73.1	57.5		68.3	52.4		
Regents Park Community College	67%	64%		85.0	80.6		85.2	77.2		
St Anne's Catholic School	63%	72%		65.5	78.4		87.3	70.5		
St George Catholic College	55%	45%		71.6	81.9		48.1	80.7		
The Sholing Technology College	64%	50%		74.5	64.4		69.7	45.5		
Upper Shirley High School	58%	49%		65.6	77.3		77.3	60.4		
Woodlands Community College	56%	37%		72.5	60.4		78.2	46.4		
Southampton	58%	51%		71.6	69.3		74.9	62.2		
National (median progress)	61%	57%		73	73		74	67		

Red identifies schools at risk of been 'coasting' in 2015

The orange colour denotes schools below 60% for any year of data between 2013-2014

The orange colour denotes schools below the National median for progress in Reading, Writing and Maths

Virtual School - The role and operation of the Virtual School (including how it supports our LAC)

28.	The Virtual school is staffed by:
	- The Virtual School Head - the lead responsible officer for ensuring that arrangements are in place to improve the educational experiences and outcomes of the authority's looked after children, including those placed out-of-authority. The head must ensure that there are effective arrangements in place to work with a range of professionals who will play a role in supporting the education of looked after children. - Lead officer for Looked after children – full time post - Specialist Teacher for Looked After Children - 0.80, term time only - Emotional wellbeing development Officers (EWDO) x2 – term time only - Educational psychologist – 0.50 FTE - Teacher – Letterbox Lead and casework - sessional worker – term time only. The team is enabled to work because of the full support of a range of teams including Admissions, SEND, Data Team and the full support of our school-based colleagues.
29.	The remit of the Virtual School is subject to the statutory guidance set out in '**Promoting the education of Looked after Children'** (July 2014): - Working to close the attainment and progress gap between looked after children and their peers and creating a culture of high expectations - Ensuring that the children have access to a suitable range of high quality education placement options - Attendance and educational progress are monitored - Maintaining an up to date roll of all LAC who are in school or college placements and gather information about their placements, attendance and progress - Keep schools informed about children on their rolls who are looked after - Ensure the full range of professionals understand their roles and responsibilities in initiating, developing, reviewing and updating Personal education Plans - Completion of individual Personal Education Plans for all LAC on roll - Good attendance and behaviour are promoted to prevent exclusion. - Admission powers are used in a timely manner to ensure pupils are admitted to schools promptly.
30.	By working closely with colleagues in social care and a range of other professionals the school supports our young people by: - Training and liaising with designated teachers - Offering support and advice regarding financial issues - Signposting to other services and programmes of work - Teaching on a 1:1 basis and supporting transitions between schools for targeted pupils - Delivering training and support to social workers and foster carers on issues regarding education. Training also includes a focus on

	resilience, legal issues and advocating for young people. • Training social workers on PEPs. • Liaising closely with social workers and the Admission team to promote school finding and admission. • Direct involvement in complex cases.
31.	The number of pupils currently on roll is 410, compared to 381 in May '15. Pupils on the virtual school roll attend a range of settings determined by their ages and needs. The school aims to place all pupils in schools that are rated at least "good" by Ofsted. Some pupils attend schools that fall below this standard but this decision is based on full discussions between school staff, social workers and the carers and a review of the current Ofsted report and any Ofsted follow up visits. Where a pupil is placed in another authority this discussion also includes their virtual school staff. Statutory guidance is explicit that wherever possible children and young people should be placed in Good or outstanding schools. Many of the schools judged by Ofsted as inadequate have received follow up visits that recognise they are making significant progress and this increases our confidence in the suitability of the placement. There is a clear expectation that social workers consult and liaise with the Virtual School team when school places are being sought.
32.	Considerable numbers of pupils on the school roll are placed in care and schools outside the local authority .The Virtual school works closely with social workers, and the receiving authorities including other Virtual school staff to identify suitable schools and visits are made to the new settings where possible.
33.	**CLA Target Tracker -** Since October 2013 Southampton's Virtual school has been using a version of the CLA tracker to collect and monitor data for pupils placed in schools both in the city and in other authorities. Data is collected from a number of sources including data inputted by schools. Data is collected at least termly and this is proving useful in reviewing the effectiveness of the educational interventions that are in place.
34.	**Exclusions -** Southampton continues to use Welfare Call to monitor and collect attendance and exclusion data for pupils within the virtual school who are placed in schools outside the city. Schools in the city provide this information to our Data Team. The Virtual School works closely with schools in the prevention of exclusions.
35.	**Attendance -** The collection of attendance data is a crucial for the Virtual school as it enables us to identify individual pupils in need of support and to discuss with the schools, carers and social workers the reasons for absence and how we may address difficulties and support improvement. Attendance is tracked on a weekly basis. Pupil attendance is monitored weekly and where there is absence that the Vs does not know about staff will ring the school, the carer and the named social worker to follow up and ensure pupils return to school as soon as possible.
36.	**Pupil Premium -** The looked after child premium is distinct from the broader pupil premium grant and is 'to be used for the benefit of the looked after child' educational needs as described in the personal education plan.' The funding is spent in accordance with the pupil Premium strategy.
37.	The Virtual school contributes to the decisions about how the funding is allocated to benefit the education of Children Looked After through their

	contribution to and oversight of the PEP process. Previously the Virtual school audited a sample of the completed PEPs each term and provides feedback to schools and social workers on the quality of the audited PEPs with advice and strategies for improvement. From September 2015 all PEPs are audited in this way.
38.	**Personal Education Plans (PEPs) -** PEPS are the core means by which the school in the person of the Designated teacher, social workers, carers, the young person and the virtual school work together to ensure that they develop a PEP that reviews a pupil's progress, identifies ongoing needs, develops targets to meet those needs and identifies the support that will be needed to achieve them. All pupils should have three PEPs a year; the completion rate for this term currently stands at 72%. All pupils in Y10 and Y11 have an up-to-date PEP.
39.	**Designated Teachers** - All schools must have a Designated Teacher who holds the key responsibility for ensuring that PEPs are implemented. Designated teachers should provide an annual report to school Governors on the progress of CLAs annually. The Virtual School maintains a comprehensive data base of all the Designated Teachers in the city and schools outside the city where our children and young people are placed. The school is in regular contact with them. Training has been provided to governors and designated teachers and this is part of the statutory role of the school.
40.	**Foster Carers -** Foster Carers are very important people bringing support and stability to our children and young people's lives including advocating for them. Working with and supporting Carers is a core role for the Virtual school through advice and support regarding educational issues. Contact can be formal, through training or through email or telephone contact. All new Foster Carers go through statutory induction training at Levels 1 and 2 and the Virtual School contributes to this.
41.	The Education Matters course delivered by the VS team is run twice a year. Each course runs for three days and alongside the taught course there are plenty of opportunities for carers to explore their concerns and for the team to problem solve with them. The course covers: • PEPs and their importance • SEN matters • Emotional Literacy • Problem solving • Exclusions and behaviour –Rights and responsibilities • School expectations-Key Stages and levels
42.	**School Placements** - The Virtual School plays an important role in placing children and young people in the most appropriate educational setting. Our aim is always to place in schools that are judged to be at least Good by the Ofsted process. Agreement to a school that falls below this standard is subject to a great deal of discussion including a review of progress made by the school towards achieving a Good judgement. The Virtual School works with the Admissions team to negotiate places and where necessary uses the powers it has to direct schools to admit. A full review of the quality of school places will be completed by the end of the Autumn term.

43.	The school development plan is completed and has identified a number of priorities that will support the prime focus of the school which is to close the attainment gap between CLA and their peers. Priorities include Finance, Early Years, Training, Attendance and Exclusions, Raising Aspirations and Expectations, Data, PEPs and Establishing a Governing Body who will act as a critical friend to the school. The Governors will be a sub group of the corporate Parenting Committee and all the reports to the Governing Body will be shared with the Corporate Parenting Committee.

RESOURCE IMPLICATIONS

Capital/Revenue

44.	None as a result of this report.

Property/Other

45.	None as a result of this report.

LEGAL IMPLICATIONS

Statutory power to undertake proposals in the report:

46.	The duty to undertake overview and scrutiny is set out in Part 1A Section 9 of the Local Government Act 2000.

Other Legal Implications:

47.	None as a result of this report.

POLICY FRAMEWORK IMPLICATIONS

48.	School standards in Southampton have a significant impact on the council achieving its priorities. In particular the following priorities: • Jobs for local people • Prevention and early intervention.

KEY DECISION	No

WARDS/COMMUNITIES AFFECTED:	None directly as a result of this report

SUPPORTING DOCUMENTATION

Appendices

1.	Secondary School data
2.	Summary of contact that has taken place between SCC and Secondary Schools regarding performance for Academic Year 2015

Documents In Members' Rooms

1.	None

Equality Impact Assessment

Do the implications/subject of the report require an Equality and Safety Impact Assessments (ESIA) to be carried out.	No

Privacy Impact Assessment

Do the implications/subject of the report require a Privacy Impact Assessment (PIA) to be carried out.	No
Other Background Documents **Equality Impact Assessment and Other Background documents available for inspection at:**	

Title of Background Paper(s)	Relevant Paragraph of the Access to Information Procedure Rules / Schedule 12A allowing document to be Exempt/Confidential (if applicable)
1. None	