

Inverness College UHI Corporate Parenting Plan

Background

As a post-16 Further and Higher Education body, Inverness College UHI is defined as a Corporate Parent under the Children and Young People (Scotland) Act 2014. As such, we have a responsibility to understand the lives of Scotland's looked after young people and care leavers and respond to their needs as any parent should.

Care experienced learners tend to have lower educational outcomes, with only 6% of care leavers going on to University compared with 38% of all young people. They also experience higher unemployment with one third of this group not being in education, employment or training.

Inverness College UHI is fully committed to helping to reverse these statistics ensuring parity of opportunity to all young people and improving the life chances of care experienced learners.

As a corporate parent, we have a duty to produce a Corporate Parenting Plan which details how we will respond to our responsibilities and the measures which we will put in place to improve the outcomes of care experienced leavers. Our plan builds on the previous work which we have done in achieving the Buttle UK Quality mark for Looked After Children and Care Leavers which recognised the work we have done and our commitment to this group.

Gaining Feedback on our Draft Plan

To ensure our Corporate Parenting Plan is robust and will stand up to scrutiny, we have consulted with a variety of public bodies and partners to gain their feedback. To date, feedback has been received from Who Cares? Scotland, CELCIS, CDN, Through Care and After Care, our UHI partner colleges, and we are awaiting feedback from Barnardos.

We would welcome the same opportunity to receive feedback from this Group.

Inverness College UHI Corporate Parenting Plan

Introduction – The College and Its Context

Inverness College UHI is the largest college in the Highlands and Islands attracting over 6,000 students locally and internationally. It is a partner of the University of the Highlands and Islands (UHI) together with 12 other colleges and research centres.

Inverness College UHI is situated in the city of Inverness, the capital of the Highlands, and operates from two campuses. The main college site is located in the Beechwood area of the city of Inverness which is where the majority of courses are delivered. The Scottish School of Forestry located in Balloch on the outskirts of Inverness is a specialist centre for forestry and arboriculture.

Further Education accounts for 70% of our provision. We offer over eighty Further Education programmes, around thirty Higher National courses and thirty degrees. Around two thirds of our students study on a part-time basis. A variety of Higher Education courses are taught on a networked basis and online using innovative learning technologies. As a partner college of the University of the Highlands and Islands, we offer courses that range from foundation level through to post graduate taught and research degrees.

Corporate Parenting Responsibilities

As a post-16 Further and Higher Education body, Inverness College UHI is defined as a Corporate Parent under the Children and Young People (Scotland) Act 2014. Corporate Parents have a responsibility to understand the lives of Scotland's care experienced and looked after young people and respond to their needs.

Care experienced and looked after children include;

- those in residential care
- those in foster care
- those in kinship care, who live with a family member other than a parent
- those who are looked after at home

Every looked after child and care leaver who was looked after at their 16th birthday, is entitled to corporate parenting support until their 26th birthday. Inverness College UHI have broadened this to cover any care experienced person of any age.

Care experienced learners tend to have lower educational outcomes, with only 6% of care leavers going to university compared with 38% of all young people.¹ In addition, one-third of care leavers are not in education, employment or training compared with 13% of all young

¹ <http://www.education.gov.uk/researchandstatistics/datasets/a00196857/children-looked-after-by-las-in-england>

people.² The Scottish Funding Council National Ambition and Vision' aims for there to be no difference in the outcomes of care experienced learners comparative to their peers' by 2021.

Under the Children and Young People (Scotland) Act 2014, Corporate Parents have the following duties:

- to be alert to matters which, or which might, adversely affect the wellbeing of children and young people
- to assess the needs of those children and young people for services and support it provides,
- to promote the interests of those children and young people,
- to seek to provide those children and young people with opportunities to participate in activities designed to promote their wellbeing,
- to take such action as it considers appropriate to help those children and young people
- to access opportunities it provides for activities designed to promote their wellbeing,
- to make use of services, and access support, which it provides,
- to take such other action as it considers appropriate for the purposes of improving the way in which it exercises its functions in relation to those children and young people.

As a Corporate Parent, we have a duty to produce a Corporate Parenting Plan which details how we will deliver on our corporate parenting responsibilities.

The Children and Young People (Scotland) Act 2014 includes key parts of the Getting it right for every child (GIRFEC) model. GIRFEC is a national approach to supporting the wellbeing and outcomes of all children and young people. Most children get all the support and help they need from their parent(s) and family. Where that is not the case, and extra support is required, the GIRFEC approach ensures that support is easily accessible and seamless. There are eight wellbeing indicators that form the basis of GIRFEC; safe, healthy, achieving, nurtured, active, respected, responsible and included (SHANARRI). Within each strand of our Corporate Parenting Plan, we have considered the SHANARRI indicators to ensure that care experienced young people receive the support they need to give them the best chance of succeeding at college and beyond.

The Commission for Developing Scotland's Young Workforce (Wood Report) addresses the inequalities and challenges faced by care experienced young people in terms of education, transition and employment. In reference to Recommendation 37 of the report, within our Corporate Parenting Plan we detail how we will improve the school to college transition for care experienced students. Recommendation 38 of the Wood Report refers to the provision of funding support for care experienced students and to widening opportunities for them to enrol on modern apprenticeship programmes. Activity in relation to these recommendations is featured within the work we carry out on pre-entry outreach and transitions for looked after children and care experienced young people. We have a dedicated named person in place to provide individual transitions support to care leavers and support with their applications and funding.

Demonstrating Our Commitment

On the 31st July 2014, Inverness College UHI was successful in its application for the Buttle UK Quality Mark for Looked After Children and Care Leavers. The Quality Mark was awarded to institutions that demonstrate that they have a sufficiently robust strategy in place to support students from a care background. It is a mark of excellence which recognises the work institutions do to raise aspirations of Care Leavers and Looked After Children in order to help

² <http://www.education.gov.uk/rsgateway/DB/SFR/s000960/sfr27-2010v2.pdf>

them access and succeed in further and higher education and beyond. In June 2015 the College submitted an Implementation Report to Buttle UK. The Buttle UK Assessment Panel was confident of the progress made against the action plan and the strength of plans to take the work forward for the next 2 years. As a result, they have further endorsed the College for the award until the expiry date of July 2017.

Inverness College UHI has also signed the 'Who Cares Pledge' to listen to the voice of Scotland's care experienced young people. Our staff have undergone training with 'Who Cares Scotland' to assist with the development of our Corporate Parenting Plan.

We have also signed up to the Care Leavers Covenant which outlines the cross-sector approach to support the implementation of Part 10 of the Children and Young People (Scotland) Act 2014, by bringing consistency to entitlement and support to young people.³

Collaboration

Significant progress has been made with our Buttle Action Plan over the last two years and we have forged strong relationships with partners. Continued collaboration with key partners will be a major feature of our Corporate Parenting Plan as we go forward. We have already implemented Information Sharing Protocols with organisations such as Barnardos and are continuing to develop relationships with other local partner agencies to ensure that looked after children and those that are care experienced, are identified and provided with appropriate support. These formal arrangements ensure that the exchange of information that is safe and beneficial to looked after children and care experienced students. We will continue to develop our partnership links as we go forward and to enhance collaborative work with partners such as the Local Authority and Foster Care, in relation to our Corporate Parenting Plan.

As a partner college of the University of the Highlands & Islands (UHI), we are a member of the UHI Care Leavers Group. The individual UHI partner colleges vary in terms of demographics and local context, however this group enables us to work together on joint actions in relation care leavers and looked after children across the University. Presently, we do not have joint Corporate Parenting Plan with other partners. We do however, have very strong relationships with them in terms of progressing the actions laid out within our plan. The development of a joint Corporate Parenting Plan with partners will be developed in the future.

We have consulted with both staff and students in relation to our Corporate Parenting Action Plan. Discussions have taken place at our Equality & Diversity Committee and Student Support Committee. These Committees are represented by a diverse range of college staff and by members of the College Student Association (ICSA). We have also sought feedback from looked after children and care experienced students on their experience and used their feedback to improve the provision of enhanced support services. This feedback has been considered within our Buttle action plan and will be taken forward into our Corporate Parenting Plan. We will continue to regularly seek the views of care leavers and looked after children to ensure that they are best supported to fulfil their potential and future aspirations.

The Review and Revision Process

Corporate Parents are required to report to Scottish Ministers every three years on how they are carrying out their responsibilities.

Regular internal review and revision of our progress will ensure that we are successfully delivering on our plan. Our internal Corporate Parenting Working Group is responsible for the implementing the Corporate Parenting Plan and reviewing it's progress. Progress is reported

³ <http://www.scottishcareleaverscovenant.org/covenant/>

to our Equality and Diversity Committee and Student Support Committee on a regular basis. An annual statistical report is produced which enables us to identify actions required for improvement. The review process also involves consultation with looked after children and care experienced students to ensure their views inform improvements to the support they receive.

Systems are in place to monitor and analyse data in relation to trends in applications, retention and success of care experienced students. A dashboard has been created which allows the analysis of outcome trends down to course level. The data can also be broken down to protected characteristics which allows us to identify particular groups who may require more support.

Our annual statistical report for 2014-15 provides the most up to date information on care leavers applying, accessing and achieving at college. This annual report is our baseline for measuring the progress of our Corporate Parenting Action Plan over time.

Publishing of the Plan

Our Corporate Parenting Plan will be published on our website to ensure it is openly accessible. It will be published alongside our main college publications and with the information that is currently available on support for looked after children and those who are care experienced. Signposting to alternative formats of the report will also be provided on the website to ensure it is accessible to all.

The publication of the report will be high profile and will be publicised in the media, social media and throughout the college.

Our Corporate Parenting Plan

Our Corporate Parenting Plan details how we will fulfil our Corporate Parent duties. It has been structured around the following elements which reflect the student journey from pre-entry outreach to on course support:

- Management and Delivery of plan/outcomes
- Staff training
- Raising aspirations and pre-entry out reach
- Identification of applicants that are care experienced
- Application
- Pre-entry
- On course support
- Monitoring of plan/outcome

Inverness College UHI - Corporate Parenting Action Plan (Draft)

Area	Criteria	Current Activities	Actions	Owner	Timescale	Projected Outcomes	Corporate Parenting duty	Progress
Management and Delivery of plan/outcomes	Continuous enhancement of provision for care experienced students	The College has been working to enhance services for care experienced learners through the Buttle Quality Mark. We aim to further improve services for care experienced learners through the implementation of a comprehensive Corporate Parenting Plan. This will involve reviewing and enhancing processes across the college and further collaboration with external agencies. To ensure that all areas of the learner journey are represented an extended team with full involvement of care experienced students would be beneficial to continuous enhancement of services.	1. Include care experienced learners as a priority group in strategic and operational planning	Senior management team (SMT)	Operational plan 2017	Explicit commitment to enhance services for care experienced learners.	58:1 (f) to take action to improve as a corporate parent	
			2. Establish an extended corporate parenting team to include care experienced student representatives and staff from key areas across the college with a clear purpose and remit to implement all areas of the Corporate Parenting Plan.	Head of Student Services (HOSS) Access and Progression Manager (APM)	Sep-16	All aspects of the corporate parenting plan are implemented and procedures and policies altered as required.	58:1 (f) to take action to improve as a corporate parent 59 to prepare, publish and keep plan under review	
			3. Meet with other local agency corporate parent strategic leads to look at emerging challenges and review regional plans	Principal, HOSS	Representation at Champions Board throughout 16-17	Improved collaboration and communication across corporate parents	60 to collaborate	
			4. Review staff hours of transition co-ordinator (dedicated student support professional for care leavers) to enable early and ongoing support for all care leavers	HOSS, APM	Aug-16	Comprehensive support for care experienced students in alignment with implementation plans	58:1 (f) to take action to improve as a corporate parent	
			5. Sign College up to the Care Leavers Covenant	APM	Feb-16	Demonstrate commitment to principles and actions outlined in the Scottish Care Leavers Covenant	58:1 (f) to take action to improve as a corporate parent	Completed Feb 16
			6. Include the learner voice from care experienced learners on all aspects of their learner journey, support services available etc.	Quality, SLTC		Voice of care experienced learners is considered in all areas of college life and all stages of the learner journey	60 to collaborate	
	Provide staff training across the college in relation to Corporate Parenting.	Previous awareness raising sessions were held with staff re challenges faced by care leavers and actions that can impact positively on their education. With 16 plus educational institutions now becoming Corporate Parents further training is needed. Staff participate in the wider UHI working group for care leavers and attend training and meetings at College Development Network to share resources and good practice. Staff attend relevant national conferences by providers such as Who Cares Scotland and	7. Deliver staff briefings at all departmental meetings introducing Corporate Parenting roles and responsibilities.	APM, Schools liaison and transition Co-ordinator (SLTC)	Start of semester 2, academic year 15/16	Increased staff awareness of challenges facing care experienced students. Increased awareness of the actions needed to help raise aspirations and increase success of care experienced students	58:1 (a) to be alert 58:1 (f) to take action to improve as a corporate parent	Completed Feb 16
			8. Follow staff briefings with information placed on staff intranet	APM	Feb-16			Completed Feb 16
			9. Session on Corporate Parenting to be delivered at staff conference.	SLTC	Jun-16			Completed June 16

		CELCIS	10. Level 1 online corporate parenting course developed by "Who Cares Scotland" to become mandatory for all staff and introduced to new staff at time of induction.	APM, Staff Development Officer	Jun-16			Planned for start of term 16/17 academic session
Raising aspirations and pre-entry out reach	Further strengthen links with relevant agencies to ensure comprehensive information and advice is available to care leavers at an early stage	The Schools Link and Transition Co-ordinator has established links with social work, third sector agencies and school SDS workers and guidance staff to ensure that care experienced young people are given accurate and timely information about routes into FE and HE and the support available. Staff and care leavers are invited into the college to meet with staff, tour the facilities and explore future career pathways as part of transition. The number of care leavers entering FE and HE remains lower than the national average progression statistics and therefore further work to decrease the progression and attainment gap is needed.	11. Continue to extend and strengthen partnerships with relevant agencies through meetings, literature, formal and informal communication.	SLTC	Aug-16	Further development of positive relationships with the relevant partners to ensure the optimum level of support and awareness is provided to care leavers .	58: 1 (e) access opportunities and make use of services 60. Collaborate	
			12. Plan, develop and deliver a one day event to further raise awareness of services provided and to work with agencies to explore available education pathways.	SLTC	Nov-16	Greater understanding of local progression routes for FE and HE helping to raise aspiration.	58:1 (d) to seek to provide opportunities 58: 1 (e) access opportunities and make use of services 60. Collaborate	
			13.Ensure that wording on College website is "user friendly" and encouraging.	SLTC	Aug-16	As above	58: 1 (e) access opportunities and make use of services 60 Collaborate	
			14. Produce a leaflet detailing services that the college can provide for care experienced young people. Disseminate widely to all organisations involved with care experienced young people and place leaflet on the College website.	SLTC and marketing	Nov-16	Clear and encouraging information available for care leavers. Increased uptake of support services and possible increase in numbers of care experienced young people applying for courses.	58: 1 (e) access opportunities and make use of services 60. Collaborate	
			15. Work with current care leaver students to design and produce a video detailing services. This can be used at transition events, meetings with third sector agencies and schools and will also be placed on the College website.	SLTC	May-17	As above	58: 1 (e) access opportunities and make use of services	
Identification of applicants that are care experienced	Enhance processes for declaration of care experienced status	The wording on the college application form has been changed to make declaration at application more positive however it is suspected that many still do not declare at this stage for a variety of reasons.	16.Create internal processes to ensure that declaration at different stages i.e. at interview, to PAT, to ASN etc. is recorded on SITs and reported to transition co-ordinator	SLTC, Learner administration	Aug-16	More accurate recording of care experienced status	58:1 (c) To assess needs 58: 1 (e) access opportunities and make use of services	

			17. Work with agencies to encourage care experienced young people to declare their status at time of application and /or at start of term	SLTC	Nov-16	More students accessing dedicated support	58:1 (c) To assess needs 58: 1 (e) access opportunities and make use of services	
	Increase information sharing between schools, social work, third sector agencies and the college	We currently have a data sharing agreement with Barnardos Scotland which aids joint working. The continuity of support would however be further enhanced by greater sharing of information helping to identify care leavers and their needs as early as possible.	18. Work with schools to enhance information sharing (with care leaver's consent) prior to application/entry	SLTC	Jul-16	Greater continuity of support for care leavers during and after transition	58:1 (c) To assess needs 58: 1 (e) access opportunities and make use of services	
			19. Work with social work department and third sector agencies to identify care leavers progressing to FE/HE and to identify needs (with care leaver's consent)	SLTC	Jul-16	Early identification of potential problems allowing proactive support to improve retention and success of care leavers.	58:1 (c) To assess needs 58: 1 (e) access opportunities and make use of services	
			20. Review access to and functionality of the SDS data HUB for identification and tracking of care experienced students	SLTC	May-16	Increased ability to track care experienced young people applying for college, therefore providing earlier and more comprehensive support	58:1 (c) To assess needs 58: 1 (e) access opportunities and make use of services	At present we can only access wider information from the HUB once the student has enrolled. This is too late for raising aspirations and transitions. This was discussed with SDS on the 7th June 2016
			21. Extend data sharing agreement to additional, relevant agencies.	SLTC	May-17	Increased collaboration and improved communication allowing continuity of care	58:1 (c) To assess needs 58: 1 (e) access opportunities and make use of services 60. to collaborate	
Application	Establish admissions processes that offer increased opportunities for care leavers to enter FE/HE	Students who declare care experience at time of application are flagged on the data management system and application form marked. This alerts interviewer/decision maker of the student's situation to enable them to take this into consideration.	22. Work with Executive Office Admissions Department to refine and publish HE admissions process in relation to care leavers.	APM, EO Admissions Manager	Feb-16	Admission processes that are designed to support widening access	58:1(d) to seek to provide opportunities	Agreement across network re contextualised admissions Feb 2016. To go through committee before acceptance and publication

			23. Work with Inverness College Admissions Department to review admissions procedure for FE to ensure that all care leavers are offered an interview.	APM, Admissions and Funding	Apr-16	Admission processes that are designed to support widening access	58:1(d) to seek to provide opportunities	Completed March 2016
			24. Work with Admissions Department to review admissions procedure to ensure offer of appropriate place for all care experienced applicants	HOC, HOSS, Admissions and Funding	Dec-16	Admission processes that are designed to support widening access	58:1(d) to seek to provide opportunities	
Pre-entry	Provide early contact with care experienced applicants to offer proactive support	We currently flag all care leavers who declare at time of application to alert the transition co-ordinator. This leads to early contact with student and ensures that all are offered full support. As more students declare and numbers of care experienced young people accessing tertiary education rises the demands on this service will increase.	25. Contact all care experienced applicants within three weeks of them accepting offer to welcome them and explain services available.	SLTC	Jun-16	Care experienced students feel supported and are empowered to form trusting relationships.	58:1 (c) To assess needs 58:1 (e) help access opportunities and make use of services	
	Invite all care experienced applicants to attend a transition event prior to the start of their course to familiarise them with the college and all services available.	Similar events were introduced last academic year on a one to one basis. Feedback suggested that making this a group event would help to establish peer friendships.	26. Plan, promote and deliver an engaging and comprehensive transition event for care experienced students.	SLTC	First week in August -16	Care experienced students feel welcome and better prepared for starting college. In the longer term this may help to improve retention and attainment.	58: 1 (e) access opportunities and make use of services	
	Provide timely information re funding for courses (FE and HE).	All applicants that declare care experienced status are given specific information about funding available and advice about alternative information accepted for bursary applications. Support is offered for completion of application for bursary/discretionary funding and SAAS.	27. Continue to promote, monitor and review service provided	Admissions and Funding Guidance	Sep-16	Care experienced students are aware of services available and funding available.	58: 1 (e) access opportunities and make use of services	

	Help ensure that all care experienced students have funding in place prior to the start of their course	All FE applicants that declare care experienced status are given preferential status for processing of bursary/discretionary payments. Further checking mechanisms to ensure that all care experienced students that have accepted offers have applied for relevant funding would help to further ensure that all have funding in place prior to commencement of their course.	28. Develop a series of checks to include application for funding to be covered by SLTC at pre-entry meeting with care experienced students	SLTC	Jun-16	Care experienced students have access to funding at commencement of studies.	58: 1 (e) access opportunities and make use of services	
	Help to ensure that care experienced students have access to appropriate accommodation	In September 2016 the college will have halls of residence which will be available to both FE and HE students.	29. Work with providers of halls of residence to: (a) secure preferential status for care leavers (b) secure availability of 365 day accommodation (c) ensure guarantor requirements are such that they are achievable by care experienced students	APM	Mar-16	Accommodation processes that help to ensure that care leavers are able to access and progress in education	58: 1 (d) provide opportunities 58: 1 (e) access opportunities and make use of services	(a) completed March 2016 (b) completed March 16
			30. Collaborate with throughcare and aftercare services over financial and accommodation support	APM SLTC	Aug-16		58:1 (c) to promote the interests	
On course support	Establish integrated support plans for care experienced students	Care experienced students are currently given ASN support where required, emotional and social support from the dedicated transition coordinator, health and well-being support from the Wellbeing Officer and academic support from the Personal Academic Tutor (PAT). A formalised, co-ordinated approach would be more comprehensive and effective.	31. Design and implement co-ordinated support plans that are completed with care experienced students that are shared (with consent from care leaver) with PATs, academic staff and other relevant service providers. These will include ASN requirements, emotional, social and wellbeing strategies (SHANARRI) and educational outcomes.	SLTC	Aug-16	Planned, comprehensive, co-ordinated support agreed with care leaver and shared (with permission) with relevant staff. Increase in retention and success rates for care leavers	59:1 (a) to be alert 58:1 (b) to assess needs 58:1 (d) to provide opportunities 58: 1 (e) access opportunities and make use of services	

	Monitor attendance and progression	Through a newly established monitoring process, "insight", all student attendance and progress will be monitored closely by Personal Academic Tutors	32.Create process to ensure that information for care experienced students is sent directly to the SLTC	SLTC	Aug-16	More timely intervention when required to help with retention and attainment	59:1 (a) to be alert 58:1 (b) to assess needs 58:1 (d) to provide opportunities 58: 1 (e) access opportunities and make use of services	
	Offer a series of meetings at key stages of the student journey to provide support for care experienced students	Currently a small number of care experienced students are in regular contact with the transition co-ordinator and receive ongoing support and advice. Although accepting advice and support is always a student choice, it is felt that more students could benefit from appropriate intervention.	33. In conjunction with integrated support plans establish support meetings for care experienced students at key stages of learner journey • Pre-entry / early weeks of course • Before Xmas break • Towards end of course	SLTC	Aug-16	Clearer identification of emerging and ongoing issues and needs. Increased wellbeing of care experienced students. Increase in retention and success rates for care leavers	59:1 (a) to be alert 58:1 (b) to assess needs 58:1 (d) to provide opportunities 58: 1 (e) access opportunities and make use of services 58:1 (f) to improve as a corporate parent	
			34.Increase the number of care experienced students accessing regular support and using services	SLTC	May-17	Increased wellbeing of care experienced students(SHINARRI). Increase in retention and success rates for care leavers	58: 1 (e) access opportunities and make use of services	
			35.Provide tailored progression guidance and support re further study and/or careers advice as part of the integrated support plans	SLTC, Guidance	Semester 2 – 16/17 academic year	Increased positive destination for care experienced students	58:1 (b) to assess needs 58:1 (d) to provide opportunities	
	Provide specific activities for care experienced students to help build friendship groups and provide informal support		36. Plan and deliver a range of opportunities for care experienced students to meet to share college experiences	SLTC Health and Wellbeing Officer	During semester 1 academic year 16/ 17	Provision of alternative but complimentary support system for care experienced students	58:1 (d) to provide opportunities	
37.Establish a peer mentoring scheme to give informal support to fellow care experienced students			SLTC, ICSA	Dec-16				
Monitoring of plan/outcomes	Consolidate quality monitoring procedures	Information is available on the dashboard to track and measure care experienced student outcomes. This is now available for the last two years allowing trends to be monitored and analysed.An annual report has been produced	38.Continue to monitor and analyse care leaver trends in applications, retention and success. Report to E and D committee.	Quality, SLTC	At key points of college cycle	Evaluation tools to review and enhance services provided to support care experienced students.	58:1 (a) to be alert 59 to prepare, publish and keep plan under review	

		for Buttle. This should now take the form of a Corporate Parenting report for government. Information from student surveys and focus groups is used to review provision and make changes where necessary	39. Monitor care leaver destinations post college at time of completion or withdrawal. Share information via the data Hub	Learner administration, SLTC	Monthly		58:1 (a) to be alert 60 to collaborate	
	Meet Government requirements for reporting Corporate Parenting plans/actions		40. Establish a monitoring and reporting system to comply with government requirements	Quality		Adherence to government requirements in relation to Corporate parenting	59 to prepare, publish and keep plan under review	Awaiting details /template of reporting requirements