

Committee: Cabinet

Date: 17 July 2023

Wards: All

Subject: Award of Main Contract Services – Educational Occupational Health and Services

Lead officer: Executive Director Jane McSherry

Lead Member: Councillor Sally Kenny, Cabinet Member for Education and Lifelong Learning

Contact officer: Karthiga Sivaneson

Recommendations:

- 1 That Cabinet approve the award of the contract for Educational Occupational Health Services, (Ed OT), for the initial contract term of four (4) years, with the option to extend for up to two (2) years for Merton children and young people with Education, Health and Care plans, (EHCP). The identities of the preferred and unsuccessful bidders are set out in Appendix A
- 2 That Cabinet notes the spend for the Educational Occupational Therapy services for an initial term of four (4) years, with the option to extend for two (2) years, with a total contract value as shown in Appendix A for the full six years.
- 3 That Cabinet delegates the authority to approve the two (2) extension to the Executive Director of CLLF Department.

1 PURPOSE OF REPORT AND EXECUTIVE SUMMARY

- 1.1. The purpose of this report is to recommend that Cabinet approve the award of the contract for the provision of Educational Occupational Therapy (Ed OT) services for Merton children and young people, (CYP) with Education Health and Care Plans (EHCP) 0-25 yrs.
- 1.2. Educational Occupational Therapy services focus on enhancing a child's ability to perform everyday activities and to participate in different environments. OT interventions should result in increased functional skills which will improve quality of life, independence, self-esteem, learning and achievement for the CYP and their family.
- 1.3. The local authority has a legal duty to ensure that the special educational provision specified in section F of an Education Health and Care Plan (EHCP) is delivered. This is set out in section 42 of the Children and Families Act 2014.
- 1.4. We needed to re-procure the service following the expansion of in-borough special educational provision, including the additional 80 places at Whatley Avenue. Supporting pupils with Special Education Needs in mainstream and

in-borough special schools is a fundamental part of our Safety Valve plan, as is expansion of our in-borough special school offer. An expanded Education OT service is a key part of supporting SEN pupils in those in-borough settings. The cost of educational OT services to support this expansion has been included in the Dedicated Schools Grant and Safety Valve Planning, as have the financial implications of the award recommendation set out in this report.

- 1.5. The expansion of in-borough places reduces spend on higher cost independent special schools. The average difference in costs between maintained in-borough and independent special school places was £33k per place in 2022/23. However, the difference for some pupils can be much greater. The opening of the first 40 places at Whatley Avenue, for example, reduced costs to the DSG by more than £1.2m per annum.
- 1.6. The current contract commenced in May 2021 for an initial period of 2 (two) years ending in May 2023. The total cost over this period was £1,771,393, including a £330,000 contract variation and extension approved in November 2022, resulting in an annual cost of £855,697.
- 1.7. The value of the new contracts for the initial four (4) year term and total six (6) year term is set out in Appendix A. The new annual contract price is an increase of 35% from current annual costs. The new contract price includes additional places at Perseid School which will be included part way through the new contract.
- 1.8. The main reason for the increase in costs is the expansion of in-borough capacity including the 80 new places at Whatley Avenue, additional places in Additionally Resourced provisions and the planned new places at Perseid School. The tender price also reflects the impact of inflation particularly on professional staff costs.
- 1.9. The third factor is increased needs. In part this is about meeting more complex needs in our schools rather than more expensive independent schools, for example pupils presenting with sensory needs. But it is also about an increase in complexity with higher number of pupils being delayed in their mobility/dexterity and fine motor skills due to loss of support during the pandemic.
- 1.10. Other than inflation, the increased costs of supporting pupils in-borough was part of the modelling for the Safety Valve programme. It is more than offset by savings and cost avoidance by placing fewer children in out-of-borough and independent schools. All of the increased costs, including inflation, have been factored into the revised five year forecast.
- 1.11. The Council is planning on developing a new special school in 2025/26. However, we have not yet finalised the details of the school roll or location and therefore this has not been included within this tender exercise. We will

have sufficient time in the development of the new school to procure Ed OT for it. We will make a judgement at that time whether we would achieve best value through a variation to this contract or a new procurement.

- 1.12. New service provision planned to commence in September 2023 will be the following:
- 1.13. Lot 1 Education Setting: Mainstream schools, Additionally Resourced Provisions, Further Education Colleges, all new Educational Health and Care Needs Assessments
- 1.14. Lot 2 Merton maintained Special School Perseid
- 1.15. Lot 3 Merton maintained Special School Cricket Green School
- 1.16. Lot 4 Merton Maintained Special School Melrose (including Whatley Avenue)
- 1.17. Lot 5 Over-flow Mechanism
- 1.18. Lot 5 is an 'over-flow mechanism' to allow for spot purchasing only as necessary. No volume or value of business is guaranteed under this lot.
- 1.19. Lot 2, Lot 3 and Lot 4 have a static number of pupils given the maximum school roll therefore there will be no additional growth within these Lots as the bidders have costed based on total roll number. However, Lot 2 (Perseid Schools) will be expanded to deliver more places by 2025. This phasing is built into the specification and pricing of the new contract.
- 1.20. For Lot 1 at the time of initial tender in November 2020 we were assessing and issuing approximately three hundred (300) new plans per year and this equates to an additional sixty (60) pupils per year who may require Educational OT.
- 1.21. The specification and costing of lot 1 reflects the current and projected demand in mainstream provisions and from the development of new Additionally Resources Provisions (ARPs).

2 DETAILS

BACKGROUND

- 2.1. As of 1st November 2020 there were 2137 children and young people (CYP) with an EHCP from which approximately 770 have a requirement for Educational Occupational Therapy services. As of 1st November 2022, there were 2507 children and young people with an EHCP. The number of EHCPs has started to come down gradually but there are currently 520 pupils who have Educational OT in their EHCP who attend mainstream settings in Merton settings.

- 2.2. There are currently 245 pupils on roll at Cricket Green Special School and this is the maximum roll.
- 2.3. There are 151 pupils on roll at Perseid Special School, rising to a total roll of 196 by 2025.
- 2.4. The service is being expanded to Melrose Schools of which there is another site in Whatley Avenue with a maximum roll for all Melrose school sites is 158 pupils.
- 2.5. The current contract with the incumbent provider will end on 31 August 2023. This service was delivered via a contract on 24th May 2020 and a contract variation November 2022. The cost of Educational Occupational Therapy service for our young people in our Merton Schools comes from the DSG High Needs Block. This is a statutory function and hence we require a new provider in place by 1 September 2023. The provider will require time to recruit therapist over the summer in readiness for the new school term therefore contract award is planned for July 2023.
- 2.6. A number of these children will also have a health need for OT. Ed OT's create a bridge between the health care system and the educational system.
- 2.7. The services will deliver the Educational OT provision outlined in the pupils EHC Plan. The providers will need to undertake a review of the OT packages as part of the EHCP Review process which should take place on an annual basis but on occasion this can be more frequent. The Ed OT service will provide up to date advice for the EHCP meeting and where possible attend the EHCP review meeting.
- 2.8. This service supports several departmental and corporate targets contained in Merton's Special Educational Needs Strategy, Merton's Equality and Community Cohesion Strategy 2017-21, Children and Young Peoples' Plan 2019 – 23 and Community Plan. This service also responds to the recommendations in the SEND Local Area Inspection – Written Statement of Action.

Delivery of Services

- 2.9. The following "lots" have been defined to meet local identified needs. Education OT Providers were given the opportunity to tender for one or more or all of the Lots. The essential point to note is that Lot 4 is included to provide additional capacity so that the Council will be able to call-off (spot purchase) services from the providers appointed to the Lot when the need arises.
- 2.10. Lot 1 – Education Setting: Mainstream schools, Additionally Resourced Provisions, Further Education Colleges

2.11. The Educational OT provider will deliver the following services to pupils who attend mainstream schools and colleges within the Borough of Merton and the neighbouring Boroughs.

- Assessment and Professional Advice for new Education Health and Care Needs assessments
- Deliver the provision outlined in Section F of pupils EHCPs
- Attend or provide a written report for the EHCP review which outlines progress towards Outcomes, review of the current SEN OT needs and the provision required to meet the SEN OT needs or whether they pupil no longer requires SEN OT provision.

2.12. Lot 2, 3 and 4 – Merton maintained Special Schools

2.13. There are three special schools where we want to commission a provider to deliver a whole school approach to address the SEN OT needs of pupils on roll. The pupil roll numbers for each of these schools are:

- Lot 2 Cricket Green – 216 pupils growing to a maximum roll of 260. Primary and Secondary Provision up to Year 15.
- Lot 3 Perseid – 151 pupils on roll at Perseid Special School, rising to a total roll of 196 by 2025
- Lot 4 Melrose – The maximum roll for all Melrose school sites is 158 pupils – two sites, Melrose School and Whatley Avenue

2.14. In addition to delivering the specified and quantified provision in the individual pupils EHCP these Lots will also require the OTs to work as part of the school team and deliver occupational therapy across the school ensuring there is high quality and effective support for all pupils and those involved with them. This will include:

- Working closely with school leaders, school staff, parents and carers, and other professionals
- providing and maintain comprehensive OT provision using a Sensory Integration approach within the Special School environment.
- To support and train class-based staff in order for them to have an understanding of pupils' sensory needs and additional OT needs and to provide appropriate support.
- managing the physical resources available and to consider the staffing structure required within each of the special school settings which could involve employing and supervising students or an occupational therapy assistant.

- Providing functional assessment of children with special needs and disabilities and deliver individualised intervention aimed at maximising function.
- 2.15. Lot 5 – ‘Overflow mechanism’ with list of approved providers with no guarantee of cases
 - 2.16. The Educational OT provider will deliver the services as above.
 - 2.17. The Council has asked providers to submit unit prices for various activities associated with delivering the Ed OT service for Lot 5 only, thereby providing the Council with the opportunity to purchase activities if and when required should referrals exceed indicative volumes of children and young people.
 - 2.18. The overall supplier ranking for Lot 5 will ensure that any surplus demand will be met via the highest ranked (and lowest bid price) supplier. Any such use will be restricted as the highest ranked supplier will be approached in the first instance on use and respective costs of the additional suppliers
 - 2.19. There may be times, under unforeseen circumstances that we spot purchase Educational OT for one or more of the special schools. This will be for a short period of time. We will work with the provider at the time to provide further guidance and support to ensure smooth delivery and handover back to the existing providers of these schools.
 - 2.20. Given the tight timescales for mobilising the new providers we have been working with the incumbent provider to obtain all data including treatment schedules so that we can ensure the new provider is aware of which children and young people need to be seen within each academic term for all Lots.
 - 2.21. The incumbent provider is aware and have agreed to continue handover to new providers following the end of their current contract with the Council. Each successful bidder has provided a clear mobilisation plan which will be implemented.

3 PROCUREMENT PROCESS

- 3.1. The procurement strategy for the service provision was presented to the Council’s Corporate Procurement Board in February 2023 where approval was granted.
- 3.2. Stage 1 (Invitation to Tender): The Find a Tender (FTS) and Contracts Finder Contract notice and ITT was published on 22nd March 2023. The submission deadline is 24th April 2023.
- 3.3. The Council conducted the procurement using the open procedure in accordance with the requirements of the Public Contracts Regulations 2015 (*SI 2015/102*) (PCR 2015) and Contract Standing Orders.

- 3.4. Stage 2 (Contract Award): A preferred bidder for Lot 1, 2, 3 and 4 is appointed to deliver the Services. An 'Overflow Mechanism' has been built into the process as Lot 5. Should at any time of the life of the contracts we experience any issues with capacity, this list of approved providers will serve as a contingency.
- 3.5. The procurement process was managed via Merton Council's web based Electronic Tendering System 'The London Tenders Portal'. The exercise was carried out and supported throughout by the Commercial Services Team and the Legal Services Team within Merton Council to ensure a robust approach that adopted good practice

4 TENDERS RECEIVED

- 4.1. Two submissions to the invitation to tender was received in line with the stipulated timeframe for Lot 1
- 4.2. Three submissions to the invitation to tender was received in line with the stipulated timeframe for Lots 2 - 5

5 EVALUATION OF TENDERS

- 5.1. The tender evaluation comprised of three stages: the first of which was a suitability assessment, on a pass/fail basis; the second was the quality and technical evaluation in line with the methodology prescribed in the tender, and; the third was the price assessment.
- 5.2. Tender responses were evaluated by officers representing the Council's SEND team, Commissioning Team and Head Teachers of Perseid and Cricket Green schools in accordance with the criteria and scoring rationale set out in the invitation to tender documents. Each individual tender was evaluated by each member of the evaluation panel.
- 5.3. The panel met on the 27th April 2023 to discuss individual scores and comments for each method statement question in order to arrive at an agreed, moderated score.
- 5.4. A quality threshold was contained within the evaluation methodology. Bidders who failed to meet this threshold would be disqualified from the process, and would not progress to stage 3 – price assessment. The Council received three bids however two bidders successfully managed to meet the quality threshold. One bidder failed to meet the threshold.
- 5.5. The award criteria conveyed within the tender confirmed that the contract would be awarded on the basis of the most economically advantageous tender to the Council, based on a 40% price and 55% technical and 5% Social Value split.
- 5.6. The bids were evaluated against the following Quality and Technical criteria:

- Relevant experience and contract examples.
- Resources.
- Transition.
- Mobilisation plan.
- Methodology.
- Engagement and communication.
- Innovation and value engineering.

5.7. The bid prices were evaluated using the following formula:

$$\text{Price weighted score} = (\text{Lowest price} \div \text{other Tenderer's price}) \times \text{Price Weighting}$$

5.8. The social value commitments were evaluated using the following formula:

$$\text{Social Value weighted score} = (\text{Tenderers total social value} \div \text{Highest Tenderer's social value}) \times \text{Social Value Weighting}$$

6 ALTERNATIVE OPTIONS

- 6.1. A business case was developed in February 2023 which highlights the options available to the Council.
- 6.2. The contract with the existing provider is due to expire 31st August 2023. The Council is unable to extend the existing contract further due to the expansion of the service required to meet demand.
- 6.3. It has proved difficult in the past for the incumbent provider to deliver services to meet the demand without recruitment of further therapist. Should the Council not be able to deliver the service; in effect meaning the Council is not meeting its statutory responsibilities for these children, there is a clear risk of judicial consequences.
- 6.4. By commissioning sufficient capacity to meet need there will be cost avoidance savings gleaned from a reduction in use of more expensive spot purchased services and a reduction in costs associated with challenges brought by our failure to deliver a statutory service.
- 6.5. The new contract also supports the Safety Valve savings by supporting the expansion of in-borough special school and ARP provision and the 'ordinarily available' offer in mainstream schools. By supporting the increase in in-borough provision it also supports the reduction in spend on Home to School Transport.

- 6.6. Expanding the Education OT service to in-borough schools is an essential enabler of our Safety Valve programme. Ed OT is a critical enabler of maintaining more children in mainstream schools and in ARPs, as well as enabling more children who need special school places to be educated in borough. The contract supports the reduction in the number of EHCPs and in the number of placements in independent schools.
- 6.7. If the Council does not enter into formal contract with providers, the Council will not be able to deliver its legal duty to ensure that the special educational provision specified in section F of an Education Health and Care Plan (EHCP) is delivered. This is set out in section 42 of the Children and Families Act 2014.
- 6.8. Furthermore there will be a widening of the gap in the life chances and sustained quality of life of children and young people with EHCP and their peers.
- 6.9. The Council in recommissioning decided to remodel the service in line with the current and future needs of the Council and families.
- 6.10. The option to undertake a tender with multiple lots was necessary to have a single provider to deliver Ed OT to the majority of our children and young people (Lot 1).
- 6.11. We also required a single provider to deliver services to our most vulnerable children at Perseid School (Lot 2) (Merton's maintained special school for profound and multiple learning difficulties) and Cricket Green (Lot 3) (Merton's maintained special school for moderate learning difficulties) and Melrose Schools (Lot 4) (Merton's maintained special school for moderate learning difficulties). Providers are able to bid for both Lot 1, Lot 2, Lot 3 and Lot 4 if they have the capacity to deliver to the Lots.
- 6.12. Lot 5 will be used as an 'overflow' mechanism. Suppliers bidding for this Lot have done so under the agreement that no volumes are guaranteed, but will ensure there is contingency should the provider of Lot 1, 2, 3 and 4 not be able to meet the demands of delivering the service going forward. This is due to the number of children who require Ed OT services increasing year on year.
- 6.13. This new contracts provides long term stability and allows the development of sustained, collaborative relationships between all stakeholders acting as key driver for continuous improvement. Cost avoidance gains will be achieved by reducing the lag time between identification and service of need. This in turn will minimise the risk of escalation of need which would necessitate the child or young person requiring more specialist, intensive support at greater cost to the Council.

7 CONSULTATION UNDERTAKEN OR PROPOSED

- 7.1. Children, Lifelong Learning and Families commissioning service and Special Educational Needs team undertook a consultation process before deciding upon its commissioning model. All options of delivery were considered and the preferred model chosen as it will achieve increased value for money and financial sustainability while delivering a higher quality service to a larger cohort than the out-going model allowed.
- 7.2. We reviewed the current service provision and identified that there were a high number of referrals into the service and with the implementation of the school expansion programme the service was re-modelled.
- 7.3. We consulted with Head Teachers and SENCOs who also confirmed that there are a number of CYP not receiving provision as outlined in their EHCP. The Head Teachers were informed of the recommissioning of the provision, and have been involved within the evaluation process of the tender
- 7.4. We consulted with individual parents on the quality and delivery of the current provision. We also consulted with Kids First Parent Group on the decision not to renew the existing contract with the incumbent provide
- 7.5. The staff of the internal SEND service were consulted on identifying gaps in current service provision and the drafting of the new specification
- 7.6. Consultation will be a continual part of the service provision with regular surveys and feedback obtained from key stakeholders including the CYP receiving the service, their families and staff in schools. The outcome of this consultation will inform contract monitoring meetings.

8 TIMETABLE -

- 8.1. The timetable for contract signature (which is subject to democratic procedures) is as follows:

Event	Date
Invitation To Tender	22 nd March 2022
Deadline for receipt of Tenders	24 th April 2023
Evaluation of Tenders	25 th April – 28 th April 2023
Approval at Procurement Board	20 th June 2023
Merton Decision Approval of Award	17 th July 2023
Notification of contract award decision	25 th July 2023
"Standstill" period	3 rd August 2023
Confirm Award of Term	4 th August 2023

Contract/appointment to the panel agreement	
Target service commencement date for Lot 1, Lot 2, Lot 3.and Lot 4	1 st September 2023

9 FINANCIAL, RESOURCE AND PROPERTY IMPLICATIONS

- 9.1. The current contract commenced in May 2021 for an initial period of 2 (two) years ending in May 2023. The total cost over this period was £1,771,393, including a £330,000 contract variation approved in November 2022, resulting in an annual costs of £855,697.
- 9.2. The value of the new contracts for the initial four (4) year term and over the six (6) year total term is set out in Appendix A. This is a 35% increase of per annum.
- 9.3. The Educational Occupational Therapy service will be funded from the Dedicated Schools Grant, (DSG), for which has a deficit. However, the expansion of this service is part of the plan to address that deficit by meeting SEND needs in mainstream schools as far as possible and, where not, in in-borough ARPs and Special Schools. By supporting more children in mainstream schools and ARPs, we are reducing the number of EHCPs. By expanding in borough Special School provision, we are directly reducing costs.
- 9.4. For example, an average independent special school place costs £50,819 whereas a similar placement in an in-borough maintained school costs an average of £17,199 per place plus an average of £867 for Education OT input. This represents a significant saving. The take up of the first 40 places at Whatley Avenue has already saved £1.1m net of the costs of that provision and in-reach support.
- 9.5. The increase in costs includes the recruitment of additional new staff and management costs. Melrose School will receive 2.5 therapist at an estimated cost of £130,000 – Melrose, not previously included in the existing contract. The maximum roll for all Melrose school sites is 158 pupils. Due to the complexities of these children and young people they require 12 sessions per year per child in OT provision. Using the current market rate of £95 for spot purchasing a session, the Council would have paid £180,120.
- 9.6. There are 151 pupils on roll at Perseid Special School, rising to a total roll of 196 by 2025. Perseid School will receive 1 additional therapist at a cost of £55,000, increasing their provision from 2 to 3 therapists due to increase in complexity of children being placed plus growth. Due to the complexities of these children and young people they require 12 sessions per year per child in OT provision. Using the current market rate of £95 for spot purchasing a session, the Council would have paid £71,820.

- 9.7. There are currently 245 pupils on roll at Cricket Green Special School and this is the maximum roll Cricket Green school was understaffed in the previous contract and therefore will receive 0.5 additional therapist provision at a cost of £27,500 which will bring the staffing capacity to meet need.
- 9.8. Spot purchasing of Lot 1, mainstream school provision will cost the Council approximately £3,250,000 annually. The contracted annual costs for Lot 1 is £613,900, substantially less.
- 9.9. This contract has a contingency to address any future rise demand, particularly post-pandemic needs in mainstream settings. The calculation of the contract costs takes into account the current expenditure on Education Occupational Therapy and the predicted demand based on the expanding in-borough offer.
- 9.10. The value of the new contract is shown in the below table. The costs include the increase in pupil roll at Perseid School (Lot 2) from 151 to 196 in September 2024.
- 9.11. It should be noted that both Cricket and Perseid schools have increased the number of pupils on roll over the last year and a half yet they have not received additional Ed OT to meet the pupils' needs. Due to school expansions the Ed OT contract needs to include the increase in pupil numbers.
- 9.12. This contract has a contingency to address the rise in pupils being issued with a Final EHCP who will require Ed OT over the next four years. The calculation of the contract costs takes into account the current expenditure on Education Occupational Therapy and the predicted growth in numbers based of new EHCP's finalised on a monthly basis that include OT. These are shown as indicative volumes within the pricing schedule and providers were asked to bid using these indicative volumes. Any further costs arising from growth will be spot purchased under Lot 5.
- 9.13. A successful financial check has been undertaken on the preferred supplier

10 LEGAL AND STATUTORY IMPLICATIONS

- 10.1. As per the main body of this report, the Council is seeking approval to award four term contracts (Lot 1, Lot 2, Lot 3 and Lot 4) for the delivery of Educational Occupational Health services and to set up a framework agreement (Lot 5) from which it may call-off Educational Occupational Health services where the providers awarded contracts under Lots 1, 2, 3 and 4 have no capacity to take on new referrals.
- 10.2 The main body of the report indicates that a compliant procurement process was followed by advertising the opportunity in the FTS and managing the

procurement process in accordance with the Council's Contract Standing Orders and The Public Contracts Regulations (PCR 2015).

10.3 In accordance with PCR 2015 and the Council's Contract Regulations, the Council must observe a standstill period following the decision to award and provided that the award is not challenged enter into agreements in writing signed by the parties to them. The Council must thereafter publish a Contract Award Notice in accordance with PCR 2015.

10.4 The following points regarding service take up and payment should be noted:

- There is no guarantee of volume under any of the Lots or any obligation to make any referrals under any Lot. Referrals will be made only where the need arises.
- The Council will only be under obligation to pay for referrals made and invoices will be submitted showing activity data as evidence of service delivery.

11 HUMAN RIGHTS, EQUALITIES AND COMMUNITY COHESION IMPLICATIONS

11.1. The local authority has a legal duty to ensure that the special educational provision specified in section F of an Education Health and Care Plan (EHCP) is delivered. This is set out in section 42 of the Children and Families Act 2014.

11.2. Implications pertaining to human rights, equalities and community cohesion were considered during the consultation phase and development of the business case in relation to this project. There are not expected to be any human rights issues from the programme.

11.3. The tender documentation submitted by all selected bidders was assessed against criteria developed to comply with current equalities legislation. This will ensure that contracts are awarded to organisations that have an equalities and diversity policy and practices which can impact positively on the delivery of the service.

11.4. The Equality Act 2010 and the regulations in relation to discrimination on grounds of sexuality, religion and age have been considered during the tender evaluation process

11.5. Within the tender, bidders were required to propose social value offers via the Councils Social Value charter, under 5 specific theme areas: Jobs; Growth; Social; Environmental, and Innovation. The social value offers submitted via the successful bidder will potentially generate social value to the London Borough of Merton.

- 11.6. The social value offers committed within the successful bid include: provision of apprenticeships, measures to tackle carbon emissions, and the provision of meaningful work placements/pre-employment courses.

12 CRIME AND DISORDER IMPLICATIONS

- 12.1. There are not expected to be any crime and disorder issues from the programme.

13 RISK MANAGEMENT AND HEALTH AND SAFETY IMPLICATIONS

- 13.1. The invitation to tender followed a competitive process following established procedures. The tender process allowed the panel members to independently review all bidders equally and compare its value for money.
- 13.2. All providers that are awarded contracts must have a health and safety policy that compliments the council's corporate procedures for effective health and safety and risk management.

14 CONFIDENTIAL APPENDICES – THE FOLLOWING DOCUMENTS ARE NOT TO BE PUBLISHED WITH THIS REPORT BUT FORM PART OF THE REPORT.

15 BACKGROUND PAPERS

- 15.1. None