



Programme Audit/Major Modification report

Programme provider:	Hertfordshire, University of	
	East and North Hertfordshire Hospitals NHS Trust (NHS East of England)	
In partnership with: (Associated practice	West Hertfordshire Hospital NHS Trust (NHS East of England)	
placement providers involved in the delivery of the	Barnet, Enfield and Haringey Mental health NHS Trust	
programme)	Luton and Dunstable University Hospital NHS Foundation Trust	
	Princess Alexandra Hospital NHS Trust	
Date of review:	14 May 2019	
Type of Modification	Desktop	
Provision reviewed:	Registered Midwife - 18M	
	Registered Midwife - 36M	
Title of assument	BSc (Hons) Pre-registration Midwifery (shortened)	
Title of current programme:	BSc (Hons) Pre-registration Midwifery (three year)	
programme.	Master in Midwifery in Pre-Registration Midwifery (shortened)	
Title of modified programme if changed:		
	England, Wales, Northern Ireland	
	☐ Level 5 ⊠ Level 6 ⊠ Level 7	
Academic level of current	SCQF	
programme:	Level 8 Level 9 Level 10	
	Level 11	
Academic level of modified	England, Wales, Northern Ireland	
programme if changed:	☐ Level 5 ☐ Level 6 ☐ Level 7	





	SCQF Level 8 Level 9 Level 10 Level 11
Reviewer:	Ms Nicola Clark





Outcome of Approval Panel Meeting	
Outcome:	Recommended for approval with recommendations
Conditions and NMC	Resources
standard(s)/requirement(s) they relate to:	None identified
	Admission and progression
	None identified
	Practice learning
	None identified
	Fitness for practice
	None identified
	Quality assurance
	None identified
Date conditions to be met:	
Recommendations and NMC standard(s)/requirement(s) they relate to:	Recommendation one: The programme development teams are advised to consider involving users of the maternity service to enhance their engagement and collaboration at every stage of programme development and modification. (NMC Standard 2)
Note: recommendations will be assessed through the AEI annual self-assessment report	Recommendation two: The programme team are advised to monitor the allocation and availability of academic assessors. (NMC Standard 11)
Date conditions met:	
Programme start date:	01 Sep 2019





Summary

Summary of modification request

The University of Hertfordshire is approved to deliver a three-year BSc (Hons) midwifery programme; a Masters in pre-registration midwifery (shortened) programme and a BSc (Hons) pre-registration midwifery (shortened) programme against the Standards for pre-registration midwifery education (NMC, 2009). The school presented a major modification to the midwifery pan-London practice assessment document (MPLPAD) to support the implementation of the Standards for student supervision and assessment (SSSA) (NMC, 2018) for these programmes.

The university is an established approved education institution (AEI) and is part of the pan-London midwifery practice education advisory group (MPLPEAG), comprising of lead midwives for education (LMEs) or their deputies from 10 AEIs across London and representatives from the pan-London clinical placement facilitator (CPF) forum. The modifications to the MPLPAD have been co-ordinated by the advisory group to support the transfer of students on pre-registration midwifery programmes from the Standards to support learning and assessment in practice (SLAiP) (NMC, 2008) to the SSSA from September 2019.

The MPLPEAG mapped the MPLPAD to the SSSA and the Standards for preregistration midwifery education (NMC, 2009). The current MPLPAD remains unchanged regarding the competencies, grading of practice and its sequencing of assessments from the approved programme.

There is evidence of consultation with students, service users and a wider audience of midwives and midwifery managers. All shared practice learning placements will have a joint approach to the support, supervision and assessment of student midwives.

The University of Hertfordshire presented an implementation plan to transfer all midwifery students to the SSSA from September 2019. Exceptions to the transfer may be made on a case by case basis if students have interrupted.

A review of the documentary evidence and a Skype conference call with representatives of the pan London 10 AEIs provided clarification of the modification of the MPLPAD against the SSSA. The discussion included clarification of consultation with student midwives about the plans for transfer to the SSSA, where appropriate.

The major modification to the programme is recommended to the NMC for approval.





There are two recommendations.

Feedback from key stakeholders

Presenting Team

A Skype conference call was held on 14 May 2019 with the chair of the MPLPEAG and LME representatives from 10 AEIs using the MPLPAD.

Mentors, sign-off mentors, practice teachers and employers

Not applicable - desktop review

Students

Not applicable - desktop review

Service users and carers

Not applicable - desktop review

Examples of notable and innovative practice and standards they relate to

None identified

Potential risks to compliance of education standards and standards they relate to

The programme development teams are advised to consider involving users of the maternity service to enhance their engagement and collaboration at every stage of programme development and modification. (Recommendation one) (NMC Standard 2)

The programme team are advised to monitor the allocation and availability of academic assessors. (Recommendation two) (NMC Standard 11)





Potential risks to the student learning environment and standards they relate to

None identified

Any other risks to public protection

None identified

Areas for future monitoring

- Implementation of the SSSA.
- The involvement of service users at every stage of programme management and development.
- Student support processes, in particular the allocation of academic assessors.

Outcome recommendation

The major modification is recommended to the NMC for approval. There are two recommendations.





NMC Standards

Please refer to the <u>Standards for Pre-Registration Midwifery Education (NMC, 2009)</u>, current programme specific circulars accessed via the <u>NMC Website</u>, EU Directive 2005/36/EC Article 41 (1) and Article 31 (6-7), and Section one of the Mott MacDonald <u>QA Handbook</u>.

Standards for the lead midwife for education		
Standard 1: Appointment of the lead midwife for education		
The NMC requires an approved educational institution (AEI) to do the following:		
Appoint a lead midwife for education (LME) who is a practising midwife and has a recorded midwifery teaching qualification on the NMC register.		
Confirm the appointment of an LME with the NMC		
Use the LME for strategic liaison with external agencies such as purchasers of education provision for all matters affecting midwifery education.		
What we found:		
There is no change to the standard as a result of this major modification.		
Outcome:	Standard met	
Date standards		
met:		
Revised outcome:		





Standard 2: Development, delivery and management of midwifery education programmes

The LME shall lead the development, delivery and management of the midwifery education programmes provided by the AEI, ensuring that they comply with the standards established by the NMC.

What we found:

Documentary evidence confirms that the LME is an active member of the development and modification to the pre-registration midwifery programmes. The LME is a member of the midwifery pan London pre-registration advisory group and has contributed to the discussion and collaboration for the transfer to the SSSA (NMC, 2018).

The original collaboration in 2013-14 to develop a MPLPAD involved extensive service user engagement, including development of the service user feedback form. This holistic approach to assessment was commended by the original service user group and is further strengthened in the implementation of the SSSA. When making the changes to the MPLPAD, the pan London team considered that the direct service users were the students. They engaged with a large student body to gain feedback and ideas for enhancements and for informed consent about the changes to student supervision and assessment.

The programme development teams are advised to consider involving users of the maternity service to enhance engagement and collaboration at every stage of programme development and implementation of the modification. (Recommendation one)

Outcome:	Standard met
Date standards met:	
Revised outcome:	





Standard 3: Signing the supporting declaration of good health and good character		
In accordance with rule 6(1)(a)(ii) of the registration rules, the LME shall be responsible, at her discretion, for signing the supporting declarations of good health and good character for all midwifery applications to the register.		
What we found:		
There is no change to the standard as a result of this major modification.		
Outcome:	Standard met	
Date standards		
met:		
Revised outcome:		

Standards for admission to,	and continued participation in,	pre-registration
midwifery programmes		

Age of entry

St. 4

General requirements

The following requirements for selection should be read and operated alongside programme providers' existing policies and procedures:

4.1 Selection

Wherever practicable, the selection process should include a face-to-face meeting.

Programme providers (AEIs and their service partners) are encourage, wherever possible, to involve lay people and midwifery students in the selection process. Depending on local circumstances they may be involved directly or indirectly in





selection.

All individuals in the selection process should receive appropriate training, preparation and updating which includes equality and diversity.

Representatives of partner service provider organisations should be directly involved in the selection process.

The views of the individuals directly involved in selecting applicants should be taken into account when making final decisions on whether to accept or reject an applicant.

4.2 Literacy and numeracy

AEIs are required to ensure that applicants for pre-registration midwifery education programmes have provided evidence of literacy and numeracy that includes prior achievement of basic skills sufficient to undertake a pre-registration midwifery programme of education to a satisfactory level of attainment.

4.3 Good health and good character

Applicants must demonstrate that they have good health and good character sufficient for safe and effective practice as a midwife, on entry to, and for continued participation in, programmes leading to registration with the NMC.

Applicants from overseas must meet the good health and good character as defined for UK applicants and additionally those requirements set out by the UK government for healthcare workers from overseas

4.4 Entry to the register

The NMC requires a self-declaration of good health and good character from all those entering the register for the first time. On completion of the midwifery programme the student will submit this self declaration. The declaration is either supported by the LME, whose name has been notified to the Council and who is responsible for midwifery education in the relevant AEI, or by her designated registered midwife substitute. AEIs must be able to provide evidence of having fulfilled this requirement.

What we found:	
There is no change to the standard as a result of this major modification.	
Outcome:	Standard met





Date standards		
met:		
Revised outcome:		
Standard 5: Interrupt	ions to pre-registration midwifery education programmes	
Programme providers	must ensure that they have in place processes to manage	
interruptions to the study of programmes for whatever reason.		
When a student return	s to a programme it is recommended they have a period of	
	to the length of interruption. Programme providers must	
• • • • • • • • • • • • • • • • • • • •	t's acquired knowledge and skills remain valid, enabling them	
	ary standards required on completion of the course.	
	<u> </u>	
What we found:		
There is no change to	the standard as a result of this major modification.	
Outcome:	Standard met	
Date standards		
met:		
Revised outcome:		

Standard 6: Admission with advanced standing

All applicants, other than those registered as a nurse level one (adult), must



complete a minimum three years full-time pre-registration midwifery programme of



education.	
Where a student is already registered with the NMC as a nurse level one (adult), the length of the pre-registration midwifery education programme shall be no less than 18 months full time.	
What we found:	
There is no change to	the standard as a result of this major modification.
Outcome:	Standard met
Date standards met:	
Revised outcome:	
Standard 7: Transfer	between approved educational institutions
It is the responsibility of AEIs to decide whether or not to accept an application for transfer.	
What we found:	
There is no change to the standard as a result of this major modification.	
Outcome:	Standard met

Date standards

Revised outcome:

met:





Standard 8: Stepping off and stepping on to pre-registration midwifery		
education programm	les	
Students can 'step off'	Students can 'step off' a pre-registration midwifery programme of education.	
What we found:		
There is no change to	the standard as a result of this major modification.	
Outcome:	Standard met	
Date standards met:		
Revised outcome:		
Standards for the str programmes	ucture and nature of pre-registration midwifery	
Standard 9: Academi	ic standard of programme	
Since September 2008 the minimum academic level for entry to the midwives' part of the register for those entering pre-registration midwifery programmes is degree level (NMC Circular 14/2007).		
Scotland – 360 academic credits, 60 of which must be at level nine.		
England, Wales and Northern Ireland – 300 academic credits, 60 of which must be at level H.		
What we found:		





There is no change to the standard as a result of this major modification.		
Outcome:	Standard met	
Date standards met:		
Revised outcome:		
Standard 10: Length	of programme	
Article 31(6-7) of EU D programmes in years,	rirective 2005/36/EC now describes the length of midwifery months and hours.	
	gistration midwifery programme of education should be no less valent to 156 weeks full time) and each year shall contain 45	
Three year direct entry	programme – 4,600 hours (minimum requirement)	
Where the student is already registered with the NMC as a nurse level one (adult), the length of the pre-registration midwifery programme of education shall not be less than 18 months (equivalent to 78 weeks full time).		
Eighteen month midwifery programme (following qualification as an adult nurse) – 3,000 hours (minimum requirement).		
What we found:		
There is no change to	the standard as a result of this major modification.	
Outcome:	Standard met	
Date standards		





met:	
Revised outcome:	

Standard 11: Student support

Midwife teachers and midwife mentors must meet the NMC's standards to support learning and assessment in practice.

What we found:

Documentary evidence and discussion during a skype conference call confirms the 10 AEIs pan-London who use the MPLPAD in the pre-registration midwifery programmes have collaborated to provide a strategic approach to communicating changes to student support, supervision and the practice assessment strategy. There is evidence of engagement with academic staff, student midwives and PLPs regarding the implementation of the SSSA.

All shared practice learning placements will have a joint approach to the support, supervision and assessment of student midwives. The SSSA are clearly mapped to the revised MPLPAD and supporting guides with a clear transfer plan for existing students.

The implementation of the modified MPLPAD will be phased. The AEI has identified implementation plans and proposed timelines for transferring midwifery students to the SSSA from September 2019. The implementation plans also includes continuation on the SLAiP (NMC, 2008), where relevant, for example final year students who are near to completion of the programme.

A collaborative approach for the preparation and ongoing support for the new roles of practice supervisor, practice assessor and academic assessor are clearly evidenced through the pan-London approach to implementation of the SSSA. There are clear guidelines which include the ongoing preparation, support and monitoring of the new roles which are clearly set out in guidance documents available both online and in hard copy. Detailed guidance about how to complete the assessment documentation is also provided. The documentation clearly identifies the practice





assessors and academic assessors must have due regard.

Documentary evidence and confirmation during the skype call confirms the responsibility for the preparation of the practice supervisor and assessor roles is a joint responsibility between the AEI and the PLP. A standardised approach is to be adopted to prepare new practice supervisors and assessors which is clearly detailed within the documentation.

A process for transferring existing mentors into the practice assessor roles by undertaking appropriate preparation has been developed after which each practice assessor will 'self-declare' that they have met the standards for preparation and are competent to undertake the role. Ongoing development of practice supervisors and assessors is monitored through annual staff appraisals.

There is a designated practice placement co-ordinator who is responsible for managing the entry and maintenance of the register of practice assessors, in a similar way to the maintenance of the mentor database previously used to meet the SLAiP (NMC 2008). The database of practice assessors who have undergone preparation for their role and are on the NMC register as midwives is held by the PLP organisation.

Monitoring of the effectiveness of the practice learning environment continues to be undertaken in partnership with PLPs. The AEI will continue to complete biennial educational audits of practice learning environments to provide assurance of the effectiveness of the practice learning environment and compliance with the SSSA.

The AEI identified that university midwifery academic staff will fulfil the role of academic assessor and confirmed student midwives would not have the same academic assessor for consecutive years. The AEI will provide preparation for the role. The academic assessor will liaise in person, by telephone or email with the practice assessor to collate and confirm student achievement and proficiency for each part, or year, of the programme. The programme team are advised to monitor the allocation and availability of academic assessors. (Recommendation two)

Outcome:	Standard met
Date standards met:	
Revised outcome:	





Standard 12: Balance between clinical practice and theory						
Since September 2008	B, the practice to theory ratio of each programme is required to					
be no less than 50 per	cent practice and no less than 40 percent theory.					
What we found:						
What Wo Tourid.						
There is no change to	the standard as a result of this major modification.					
Outcome:	Standard met					
Date standards						
met:						
Revised outcome:						

Standard 13: Scope of practice experience

Where the opportunity is available, students should be involved in supporting women birthing in a variety of settings.

Student midwives must be involved in the care of a small group of women throughout their childbirth experience, including antenatal, intrapartum and postnatal care.

What we found:

The MPLPAD accommodates varied practice learning placement experiences for each AEI pan-London. Therefore, the practice learning placement plans are not affected by this modification.





Caseloading is included in the ongoing record of achievement. Documentary							
evidence and discussion during the teleconference confirms that the implementation							
of SSSA does not affect the approved model of caseloading.							
Outcome:	Standard met						
	<u> </u>						
Date standards							
met:							
Revised outcome:							
Standard 14: Suparn	umerary status during clinical placement						
Standard 14. Superni	unierary status during chinical placement						
Students undertaking	pre-registration midwifery education programmes cannot be						
	employed to provide midwifery care during their training – all clinical experience						
should be education-led with students having supernumerary status for the duration.							
chosis to equation for the diagona having supernamerary states for the duration.							
What we found:							
There is no change to	the standard as a result of this major modification.						
There is no change to	the standard do a resourcer this major medineation.						
Outcome:	Standard met						
	<u> </u>						
Date standards							
met:							
Revised outcome:							





Standard 15: Assessment strategy

Clinical practice must be graded and be counted as part of the academic award.

All outcomes within a progression point period (for example an academic year) have to be achieved and confirmed within 12 weeks of entering the next academic level. All assessments must be completed and have been passed prior to successful completion of the programme.

A student midwife shall achieve these standards under the supervision of a sign-off mentor.

What we found:

Documentary evidence confirms the assessment of students' proficiency and competence, EU directives and essential skills clusters (ESCs) (NMC, 2009) are all recorded in the practice assessment documentation (PAD). These aspects of the programme are not changing, as the programme is still mapped against the Standards for pre-registration midwifery education (NMC, 2009). However, who is eligible to contribute to the assessment of practice has changed in line with the new SSSA roles of practice supervisor, practice assessor and academic assessor. The PAD is updated to reflect these changes. The documentation clearly identifies the practice assessors and academic assessors must have due regard.

The modified MPLPAD will continue to grade midwifery practice in the same way as the current MPLPAD. The structure of the programme has not been affected by the implementation of the SSSA, therefore the progression points are unchanged.

Communication between the practice supervisor, practice assessor and academic assessor will enable the summative assessment of students in practice. The MPLPAD has clearly identified feedback sheets for written feedback, which will be used as a source of evidence to inform summative assessment and recommendations for student progression. Following summative assessment, the academic assessor reviews the MPLPAD and completes the ongoing achievement record (OAR).

Within the MPLPAD, there is a clearly identified action plan template to support students failing to achieve. Practice supervisors and practice assessors have access to policies to raise and escalate concerns, where relevant.

Outcome:	Standard met





Date standards							
met:							
Revised outcome:							
Standard 16: Ongoin	g record of achievement						
An ongoing record of a	achievement, including comments from mentors, must be						
0 0	ement to the next to enable judgements to be made on the						
student's progress.	mont to the next to enable judgement to be made en and						
otaaont o p. 05. 000.							
What we found:							
What we realise							
The OAR has been mo	odified to align with the new SSSA. The document now						
	ssessor to verify the student's progression and provide details						
	or development throughout the programme.						
Outcome:	Standard met						
Date standards	Τ						
met:							
mei.							
Revised outcome:							
Achieving the NMC s	tandards						
Achieving the NMC s	tandards						





Students need to be proficient in all standards by the end of their training in order to practise safely and effectively as a midwife without the need for direct supervision. A student must demonstrate competence in these standards to enter the register as a midwife. What we found: There is no change to the standard as a result of this major modification. Outcome: Standard met Date standards met: Revised outcome: NMC Circular 03/2011 Resources to support programme intentions Programme providers must provide evidence at programme approval that resources are currently available to support programme intentions. What we found: The AEI provided a statement of compliance in partnership with PLP organisations which confirms there are sufficient resources in place in practice learning environments and in the university settings to support the implementation of the SSSA and deliver the pre-registration midwifery programmes. Outcome: Standard met **Date standards** met:





Revised outcome:	

Evidence and references list

Mott MacDonald mapping form MPLPAD, commentary and evidence, three-year programme, undated

Mott MacDonald mapping form MPLPAD, commentary and evidence, shortened programme, undated

University of Hertfordshire (UoH) SSSA mapping midwifery pan-London BSc (Hons) (three-year midwifery programme), March 2019

UoH SSSA mapping midwifery PAN London BSc (Hons) (shortened midwifery programme), March 2019

UoH SSSA BSc Hons / PGDip/MSc 156-week OAR (with caseloading), 7 March 2019

UoH SSSA BSc Hons/ PGDip/MSc midwifery OAR (with caseloading) 85-week 2019

Email to students regarding student transfer to SSSA from September 2019, 11 March 2019

Directors of service and education minutes, 12 October 2019

Draft directors of service and education minutes, 18 January 2019

Implementation of academic assessor roles in midwifery, undated

EAG minutes, 11 January 2019

PLMPEAG minutes, 28 February 2019 CORRECTED version

PLMPEAG minutes, 30 January 2019, 28 February 2019

PLMPEAG minutes, 12 March 2019

Verification of involvement in student midwife caseloading shortened and three-year programme, 2019

MPLPAD Year 1 BSc/ PGDip/MSc year one with SSSA, 28 March 2019

MPLPAD Year 2 BSc/ PGDip/MSc year one with SSSA, 17 March 2019

MPLPAD Year 3 BSc/ PGDip/MSc year one with SSSA, 17 March 2019





Part 1 L6 MPLPAD 2019 SSSA, 28 January 2019

Part 1 L7 MPLPAD 2019 SSSA, 29 March 2019

Part 2 L6 MPLPAD 2019 SSSA, 17 March 2019

Part 2 L7 MPLPAD 2019 SSSA, 17 March 2019

MPLPAD mapping document final, 2 December 2014

Register of academic assessors self-declaration, undated

Register of practice assessors self-declaration form, undated

Pan-London guide to the midwifery SSSA for academics, 18 March 2019

Pan-London guide to the midwifery SSSA for midwives, 17 March 2019

Pan-London guide to the midwifery SSSA for students, 21 March 2019

Skype conference call, the MPLPEAG Chair and LME representatives from all 10 AEIs using the MPLPAD, 14 May 2019

Personnel supporting programme approval

Members of Approval Panel

Desktop review

Programme Presenters

Skype conference call, 14 May 2019 with two NMC QA visitors and:

- Midwifery pan-London project officer
- LME, University of Greenwich
- LME, London South Bank University
- LME, King's College London
- LME, University of West London
- LME, University of Hertfordshire
- LME, Kingston and St George's University of London
- LME, Middlesex University London
- LME, City, University of London
- LME, University of Leicester
- Midwifery lecturer, Canterbury Christchurch University





Were any service providers visited?							
None - desktop review							
Meetings with others							
Mentors / sign-off men	ntors						
Practice teachers							
Service users / Carers	S						
Practice Education Fa	acilitato	r					
Director / manager nu	ırsing						
Director / manager mi	dwifery	′					
Education commissio	ners or	equivalent					
Designated Medical Practitioners							
Other (please specify)							
If there were no representatives present during the approval event please state why:							
This is a desktop event.							
Meetings with students							
Nursing							
Adult		Year 1	Year 2	Year 3	Year 4		
Mental Health		Year 1	Year 2	Year 3	Year 4		





Year 1 Year 2		Yea	r 3		Year 4				
Year 1	Year 1 Ye		ear 2		Year 3			Year 4	
Year 1	Year 1 Year 2		2 Year 3						
Year 1	Year 1 Year 2								
HV	HV SN OH			FH	FHN RPHN				
Mentor			Practice Teacher			Teacher			
V100		V150		V300					
Adult			Mental Health			Children's			
Learning Disability			General Practice Nursing			ice	Community Mental Health Nursing		
Community Learning Disabilities Nursing			Community Children's Nursing			District Nursing			
	Year 1 Year 1 Year 1 HV Mentor V100 Adult Learning Disability Communit Learning Disabilities	Year 1 Year 1 Year 1 HV S Mentor V100 Adult Learning Disability Community Learning Disabilities	Year 1 Ye	Year 1 Year 2 Year 1 Year 2 Year 1 Year 2 HV SN Mentor Pra Tea V100 V15 Adult Me Learning Ge Nu Community Co Ch Nu Disabilities Nu	Year 1 Year 2 Year 1 Year 2 Year 1 Year 2 HV SN OH Mentor Practice Teacher V100 V150 Adult Mental H Learning Disability General Nursing Community Learning Disabilities Nursing	Year 1 Year 2 Year Year 1 Year 2 Year Year 1 Year 2 HV SN OH Mentor Practice Teacher V100 V150 Adult Mental Health Learning Disability General Pract Nursing Community Learning Disabilities Nursing	Year 1 Year 2 Year 3 Year 1 Year 2 Year 3 Year 1 Year 2 HV SN OH FH Mentor Practice Teacher V100 V150 Adult Mental Health Learning Disability General Practice Nursing Community Learning Disabilities Nursing	Year 1 Year 2 Year 3 Year 1 Year 2 Year 3 Year 1 Year 2 HV SN OH FHN Mentor Practice Teacher V100 V150 V300 Adult Mental Health Child Learning Disability General Practice Nursing Community Community Children's Nursing Community Children's Nursing	

Additional evidence viewed





- Context statement MPLPAD SSSA 2019
- Pan-London MPAD event, 10 December 2018
- Pan-London practice learning environment audit tool 2019
- SSSA assessment strategy, undated
- SSSA implementing the standards, undated
- Programme specifications 2019-20
- Programme handbook (BSc) Midwifery updated 17 September 2019
- NMC Approval report RM18, 8 May 2018
- Care Quality Commission report Hampshire Hospitals NHS Foundation Trust,
 26 September 2018

Mott MacDonald Group Disclaimer

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Issue record			
Author:	Nicola Clark	Date:	07 Jun 2019
Checked by:	Judith Porch	Date:	28 Jul 2019
Approved by:	Andrea Bacon	Date:	30 July 2019