

## Approved by Our Lady of the Assumption Governors: 8<sup>th</sup> June 2016

# Policy for the Management of Visits, Trips and Learning Outside the Classroom

## In force from 1<sup>st</sup> October 2011

Revised 11/5/2012 to take account of OEAP National Guidance change and add requirement for Field Studies visits in mountain or moorland to follow the same standards as other adventurous activities.

Revised 20/6/2012 to change EDVIS11 form to National Guidance document 8p and to clarify the three categories of visit and requirements for approval.

Revised 18/12/2013 to take account of EYFS requirements and change terminology from CRB to DBS checks and CLYP to peoples directorate, alter the contact details for Outdoor Education Adviser and update the current insurance details. Lowland leader award added to the qualifications matrix.

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#### 1. Provision of Guidance

Coventry City Council has formally adopted the "Outdoor Education Advisers' Panel National Guidance (OEAP NG)" to replace the "Policy and Guidance for Educational Visits 2007". This new guidance is available online at:

## www.oeapng.info

It is a legal expectation that employees **must** work within the requirements of their employer's guidance; therefore employees within the People's Directorate **must** follow the **requirements** of "OEAP National Guidance", as well as the requirements of this Policy Statement. They are also advised to follow any **recommendations** contained in OEAP NG.

Where another employer (such as the Governing Body of a Voluntary Aided school or Academy) wishes to opt into Coventry City Council guidance and systems, they should produce a policy statement that makes this clear.

Where a People's Directorate employee outsources activity involving visits or Learning Outside the Classroom (LOtC), they must ensure that any commissioned agent has either:

- 1. adopted Coventry City Council Employer Guidance or
- 2. have systems and procedures in place where the standards are not less than those required by OEAP NG.

## 2. Scope and Remit

This guidance applies to all those who have a responsibility for the management of young people, up to the age of 21, including vulnerable adults, taking part in off-site educational activities and visits organised by, and under the control of, representatives of any establishment, under the auspices of Coventry City Council's People's Directorate. They also represent strong guidance to the voluntary sector, and also to the organisation of adult activities and visits. However, when voluntary organisations are funded by the City Council these guidelines apply.

The guidance applies to any activity or visit led by full/part time staff or volunteers acting on behalf of the City Council regardless of whether or not the activities take place within or outside of normal working hours, including weekends and holiday periods.

Voluntary Aided schools will maintain the post of Educational Visits Co-ordinator and are strongly advised to work in partnership with the Local Authority and comply with this quidance.

Academy Schools may choose to 'buy in' to Coventry City Council Guidance and procedures. They should contact the Outdoor Education Adviser to arrange this.

For a more expansive explanation of legal expectations see the OEAP NG document: *Underpinning Legal Framework* 

#### 3. Ensuring Understanding of Basic Requirements

As an employer, Coventry City Council is required to ensure that its employees are provided with:

#### A. Appropriate guidance relating to visits and LOtC activity.

> The appropriate guidance for the management of outdoor learning and LOtC in Coventry is the OEAP National Guidance web site.

#### B. Training to support the guidance to ensure that it is understood.

- For those involved in managing and leading visits the relevant training courses are:
  - 1) Educational Visit Coordinator (EVC) Training all establishments operating under this policy are required to have a current, Coventry-trained EVC in post.
  - 2) Visit Leader Training this course is recommended for all those who lead trips or visits Currently there is no revalidation requirement. However, to ensure that leader competence remains current periodic refresher training is recommended.

#### C. Suitable systems and processes to ensure that those trained are kept updated.

For the purposes of day-to-day updating of information, EVCs and Visit/Activity Leaders are directed to the periodic EVC updates and notes on the EVOLVE visit notification and approval website: www.coventryvisits.org.uk

#### D. Access to advice, support and further training.

> Where an employee experiences problems with finding the material they are looking for, or require clarification or further help, guidance or bespoke training,

they should contact their establishment's Educational Visits Coordinator (EVC), or the Local Authority Outdoor Education Adviser:

Sarah Atkins

Plas Dol-y-Moch 01766 510200 Maentwrog 07943520599

Blaenau Ffestiniog <u>sarahatkins@plasdolymoch.co.uk</u>

Gwynedd LL41 3YT

#### 4. Approval and Notification

Coventry City Council uses an online system for notification and approval called EVOLVE. A key feature of this system is that visits and LOtC activities requiring Local Authority approval are automatically brought to the attention of the Local Authority. Those visits and activities not requiring approval may be viewed, sampled or monitored.

The Local Authority retains to itself approval for all visits involving adventure activities or overseas travel. Such visits must be submitted to the Local Authority, via EVOLVE, at least 28 days before the departure date.

Approval for all other visits is delegated to the establishment head / manager.

Establishment policy should set appropriate deadlines and systems for staff to seek this approval.

It is a requirement that all establishments operating under this policy use the EVOLVE system. For further advice and help on this contact the adviser.

There are three categories of visit:

- 1. Local visits with normal everyday hazards (within 20 miles of the school) these must be planned, led and approved in accordance with the policy and guidance and establishments are encouraged to record them on EVOLVE but this is not a requirement establishments may have other ways of recording these. Establishments are encouraged to develop a generic operating procedure/ extended learning environment to cover these visits.
- 2. **Visits within the UK not involving adventurous activities** these must be recorded on EVOLVE and approved at establishment level before departure.

3. Visits outside the UK or visits involving adventure activities – these must be recorded on EVOLVE and approved at establishment level at least level 28 days prior to departure, to allow time for Local Authority approval.

#### 5. Risk Management

The risk management of an activity/visit should be informed by the benefits to be gained from participating. Coventry City Council strongly recommends a "Risk-Benefit Assessment" approach, whereby the starting point for planning should be a consideration of the targeted benefits and learning outcomes. This appreciation of the benefits to be gained, through participation, provides some objectivity to a decision that any residual risk (i.e. the risks remaining after control measures have been put in place) is "acceptable". HSE endorse this approach through their "*Principles of Sensible Risk Management*" and advocate that it is important that young people are exposed to well-managed risks so that they learn how to manage risk for themselves.

There is a legal requirement for the risk assessment process to be recorded and for suitable and sufficient control measures to be identified for any significant risks. There is no legal or Coventry City Council requirement to produce this risk assessment record in a particular format, however, a variety of possible formats can be accessed through EVOLVE.

EVC training provides a framework for appropriate planning depending on visit complexity. This framework forms a spectrum from local visits, covered by a generic establishment policy, to complex overseas visits requiring detailed preparation and planning.

## 6. Emergency Planning and Critical Incidents

A critical incident is any incident where events go beyond the normal coping mechanisms and experience of the visit leadership team.

All establishments are required to have an emergency plan in place to deal with a critical incident during a visit. Establishments are advised to test these plans periodically.

When an incident overwhelms the establishment's emergency response capability; where it involves serious injury or fatality or where it is likely to attract media attention then assistance should be sought from the local authority.

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To activate support from Coventry City Council, the following telephone numbers

should be used:

Normal office hours: 02476 831 500

Outside normal office hours: 02476 833 333

These numbers should be carried by both establishment base contacts and visit leaders, at all

times during an off-site activity but should only be used in the case of a genuine emergency.

When calling you should state that you need support from People's Directorate senior

management; say who you are; which school/establishment and give brief details of

the incident, the group, the location and a phone number you can be called back on.

Establishments must inform Coventry City Council Health and Safety section immediately

following any serious injury or fatality.

Refer to OEAP NG documents and checklists

7. Monitoring

Coventry City Council will undertake sample monitoring of the visits and LOtC activities

undertaken by its establishments. While Local Authority officers will undertake some

monitoring there is a requirement that all establishments carry out monitoring of their visits.

Such monitoring should be in keeping with the recommendations of OEAP NG. There is a

clear expectation that the monitoring function is a delegated task, principally carried out

through systems put in place by the establishment EVC.

Refer to OEAP NG document: Monitoring

8. Assessment of Leader Competence

It is an expectation of this Policy that all Coventry City Council leaders and their assistants

have been formally assessed as competent to undertake such responsibilities as they have

been assigned, in line with the OEAP guidance.

When assessing the competence of a prospective Visit / Activity Leader, (or Assistant Leader

where they may take sole responsibility for a sub-group) a Head / Manager should make

judgements about:

The level of relevant experience

Any relevant training undertaken

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- The emotional and leadership ability to make dynamic risk management judgements and take charge of any emergencies that may arise.
- The level of knowledge of the group, the staff, the venue and the activities to be undertaken.
- Knowledge and understanding of the LA and establishment procedures
- In some circumstances (e.g. first aid, adventurous activities) a formally accredited qualification may be required (see below).

Staff participating in off-site activities and visits must be aware of the extent of their duty of care and should only be given such responsibilities as are in keeping with the above guidance. It is particularly important that careful consideration of competence issues is applied to both newly qualified and newly appointed staff. Establishments should view the original documents and certificates when verifying leader's qualifications, and not rely on photocopies.

## Establishment led Adventure Activities (including Duke of Edinburgh Award expeditions and Field Studies in Mountain, or Moorland environments):

Any member of staff leading groups on an adventure activity must be specifically competent. This can be demonstrated either by:

- a. Holding an appropriate National Governing Body (NGB) Award or
- b. Gaining Local Authority leader approval. This may be given to those with proven personal and leadership experience at a comparable standard to the NGB - application should be made to the Outdoor Education Adviser using EVOLVE.

For those supervising young people on walking expeditions (or Field Studies in these environments) the following are the minimum requirements:

Terrain / activity	Minimum qualification	
Walking expeditions – lowland / non-	Certificate in Basic Expedition Leadership or	
remote terrain	Lowland Leader Award	
Walking expeditions - non-	Walking Group Leader Award (WGL)	
mountainous, hilly or moorland terrain		
Walking expeditions - mountainous	Summer Mountain Leader Award (ML summer)	
terrain		

For advice on appropriate qualifications for other adventure activities contact the Outdoor Education Adviser.

#### 9. Role-specific Requirements and Recommendations

OEAP National Guidance sets out clear and detailed responsibilities and functions of specific roles to be found within Coventry City Council's People's Directorate management structures. It also sets out clear and detailed responsibilities and functions for specific roles to be found within most establishments. Where OEAP NG job roles do not match the organisational structure in a particular establishment the underlying principles should be applied to the roles that do exist.

## 10. Charges for Off-site Activities and Visits

Heads/Managers, Curriculum Planners, EVCs and Visit/Activity Leaders must take account of the legal framework relating to charging, voluntary contributions and remissions as set out in sections 449 to 462 of the Education Act 1996.

Refer to OEAP NG document: Charges for Off-site Activity

### 11. Vetting and DBS Checks

Adults forming part of the staff team for a visit, who will work *frequently* or *intensively* with, or have *regular access to* young people or vulnerable adults, must undergo an enhanced DBS check before the visit.

For the purposes of this guidance:

- frequently is defined as "once a week or more";
- intensively is defined as 4 days or more in a month or overnight.

However, it must be clearly understood that a DBS check (or other vetting procedure) in itself, is no guarantee as to the suitability of an adult to work with any given group of young or vulnerable people.

The placement of an adult within a situation of professional trust (where young people could be vulnerable to physical or mental exploitation or grooming) should always be on the understanding that an overview based on a common sense risk-benefit assessment process has been considered.

Refer to OEAP NG document: *Vetting and DBS Checks* plus HR recruitment guidance for employees

## 12. Effective Supervision

In general terms, the Law does not prescribe activity-specific staffing ratios; but it does require that the level of supervision and group management is "effective".

Effective supervision should be determined by proper consideration of:

- age (including the developmental age) of the group;
- gender issues;
- ability of the group (including special learning needs, behavioural, medical and vulnerability characteristics etc);
- nature and location of the activity (including the type of activity, duration, skill levels involved, as well as the time of year and prevailing conditions,
- staff competence.

**The EYFS statutory framework** no longer sets out different requirements for minimum ratios during outings from those required on site. Staffing ratios are determined by considerations of the above.

Refer, in particular, to OEAP NG documents: *Group Management and Supervision* and *Ratios and Effective Supervision* 

#### 13. Early Years Foundation Stage

Establishments with EYFS provision must ensure that the requirements of the Statutory Framework are met. Of particular note here are the requirements for a qualified paediatric first aider to accompany any visit and the requirements for staffing qualifications.

#### 14. Checking Providers and Venues

All visits should be thoroughly researched to establish the suitability of the venue and to check that facilities and third party provision will meet group expectations. Such information gathering is essential in assessing the requirements for effective supervision of young people. It is a vital dimension of risk management.

Wherever reasonably practicable, it is good practice to carry out a preliminary visit. Establishment policy should clarify the circumstances where a preliminary visit is a requirement.

It is good practice for Visit Leaders to take full advantage of the nationally accredited, provider assurance schemes that are now available, thus reducing bureaucracy.

Examples of such schemes include:

- AALA licensing
- LOtC Quality Badge
- Adventuremark

EVCs and Leaders must be aware under what circumstances an AALA licence is a legal requirement, and ensure that in this case only licensed providers are used. Leaders are reminded that the AALA license is an assurance of safety, it does not accredit educational or activity quality.

Coventry City Council takes the view that where a provider holds one of the above accreditations, there should be no need to seek further assurances. Where a provider of activities does not hold one of these accreditations they should be required to complete a Provider Questionnaire (National Guidance document 8p).

#### 15. Insurance

The usual insurance arrangements for public liability and employers' liability insurance will apply to off-site activities and visits as will the personal accident covers where these have been selected as part of the service level agreement. For those establishments that are not covered by the Council's insurance arrangements (e.g. academy schools) you will need to check with your insurers to establish to what extent your policies will operate for these covers.

For those establishments that are covered by the Council's insurance arrangements additional school journey insurance can be purchased through EVOLVE. The system will give you a choice to select the Council's insurance arrangements or to indicate that you have made your own arrangements.

A copy of the summary of cover for the Council's arrangements can be found at Appendix A-Insurance Cover Summary.

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Where an establishment arranges their own insurance it is important that you make sure that the cover provided is at least equivalent to that provided by the Council's scheme.

16. Inclusion

Every effort should be made to ensure that outdoor learning activities and visits are available and accessible to all, irrespective of special educational or medical needs, ethnic origin, gender or religion. If a visit needs to cater for young people with special needs, every *reasonable* effort should be made to find a venue that is both suitable and accessible and that enables the whole group to participate fully and be actively involved.

Establishments should take all *reasonably practicable* measures to include all young people. The principles of inclusion should be promoted and addressed for all visits and reflected in establishment policy, thus ensuring an aspiration towards:

- an entitlement to participate
- accessibility through direct or realistic adaptation or modification
- integration through participation with peers

Employers, Heads/Managers, Curriculum Planners, EVCs and Visit Leaders should be aware of the extent to which Inclusion is or is not a legal issue.

• The Equality Act 2010 states that the responsible body of a school must not discriminate harass or victimise a pupil (to whom one of the protected characteristics applies Disability; Gender reassignment; Pregnancy and maternity; Race; Religion or belief; Sex and sexual orientation) in the way that it affords the pupil access to a benefit, facility or service or by not affording the pupil access to a benefit, facility or service. There is a duty to make reasonable adjustments.

Refer to OEAP NG document: Inclusion

### 17. Including parents within the staff team

All staff and helpers must be competent to carry out their defined roles and responsibilities (see section 8 above).

Where a member of the leadership team (staff or volunteer) is a parent of, or otherwise in a close relationship to, a young person taking part in the visit they should be made aware of the potential for their relationship to compromise the safety management plan (particularly in the

event of an accident). The Visit Leader, EVC and establishment head must be aware of this possibility and ensure it is addressed as part of the Risk-Benefit assessment.

#### 18. Transport

Careful thought must be given to planning transport to support off-site activities and visits. Statistics demonstrate that it is much more dangerous to travel to an activity than to engage in it and establishments must follow the specialist guidance provided in Coventry City Council's transport policy.

The level of supervision necessary should be considered as part of the risk management process. Due consideration must be given to issues of driver-distraction when considering the required level of supervision for a specific group of passengers.

The Visit Leader should ensure that coaches and buses are hired from a reputable company.

Transporting young people in private cars requires careful consideration. Where this occurs, there should be recorded procedures.

## 19. Planning

Planning should reflect the consideration of legal and good practice requirements, ensuring:

- The plan is based on establishment procedures and employer guidance.
- All staff (including any adult volunteer helpers) and the young people to be involved, have a clear understanding of their roles and responsibilities, including their role in the risk management process.
- Those in a position of parental authority have been fully informed and, where appropriate, formal consents have been obtained.
- Proportionate assurances have been obtained from any providers.
- Designated emergency contact(s) have been identified that will work on a 24/7 basis where required.
- All details of the activity provision are accessible to the emergency contact throughout the period of the activity.

It is strongly recommended that at a very early stage of the planning process, the staff team identify the benefits and learning outcomes that the activity (or range of activities) might

achieve. A record of these outcomes will help keep the plan focussed and also be a vital part of the risk management process in providing some objectivity in a "Risk Benefit Analysis".

To reduce bureaucracy and encourage activity, establishments need to take account of the legalities regarding a requirement for formal consent. When an activity is part of a planned curriculum in normal curriculum time and no parental contributions are requested, then a formal consent is not necessary. However, in the interests of good relations between the establishment and the home, it is good practice to ensure that those in a position of parental responsibility are fully informed.

This supports the move towards developing a generic operating procedure, at establishment level, for regular or routine activities. Such a procedure should make it clear how these local visits will be managed.

The degree of complexity of a particular plan will need to reflect the nature and complexity of the several variables that can impact on any given activity. These variables can be remembered as "SAGED":

- Staffing requirements trained? experienced? competent? ratios?
- Activity characteristics specialist? Overnight / accommodation issues? 'down' time?
   near water?
- **G**roup characteristics prior experience? ability? behaviour? special and medical needs?
- Environmental conditions like last time? impact of weather? water levels? Other people?
- Distance from support mechanisms in place at the home base transport?
   residential?

Refer to OEAP NG documents: The Radar and Planning Basics

#### 20. The Value and Evaluation of LOtC

The Ofsted report "Learning Outside the Classroom – How Far Should You Go?" (October 2008) makes statements in the strongest terms to support the value of LOtC, including the fact that it raises achievement. Heads, Managers, EVCs and Visit Leaders are strongly recommended to familiarise themselves with the main content of this report.

Of particular note is the finding that 'even where LOtC is highly valued and provided to a high standard, it is rarely evaluated with sufficient rigour' – i.e. in the way that classroom learning is evaluated – and a methodology to address this is provided within OEAP NG document: **Rigorous Evaluation of LOTC** 

#### Appendix A – Summary of Insurance Cover





#### **School Activities**

Here is a summary of the Cover provided by the School Activities Policy, which is underwritten by Chubb Insurance Company of Europe SE (the Company) through Coventry City Council (Insured)

Chubb Insurance Company of Europe SE is a European Company incorporated in England and Wales and registered under company number SE13 whose registered address is 106 Fenchurch Street, London EC3M 5NB.

Authorized and regulated by the Financial Services Authority.

A full copy of the Policy Numbered 64817713 is available on request from Coventry City Council, 3<sup>rd</sup> Floor, Spire House, Coventry CV1 2PW

#### DURATION

The Policy provides cover for children, employees and any authorized adult or child in the event of injury or loss whilst on any trip authorized and organized by the school involving travel outside the designated school boundaries.

Cover operates from the time of leaving the school boundaries until arriving back within the school boundaries for trips of less than one day's duration. For trips of more than one day's duration cover includes travel directly from the Insured Person's home address to the place of official assembly at the commencement of the trip and travel directly from the official place of dispersal to the Insured Person's home address upon completion of the trip.

#### SIGNIGFICANT FEATURES AND BENEFITS

Personal Accident - £20,000 for Accidental Death, Loss of one or more Limbs, Loss of sight in one or more Eyes, Total loss of Hearing in one or more ears, Total loss of Speech, Permanent Total Disablement and up to £50,000 for Permanent Partial Disablement

Overseas Medical Expenses - Unlimited

Repatriation Expenses - Unlimited

Travel Expenses – Unlimited

Chubb Assistance - see details below

Personal Property - up to £3,000 (limit £1,000 for any one article)

Delayed Personal Property (after at least 6 hours) - purchase of essential clothing or toilet items up to £1,000

Money - up to £2,000 for Money (limit £1,000 for coins and/or banknotes)

Travel Documents - up to £1,000

Cancellation, Curtailment Rearrangement and Replacement Expenses - up to £10,000

Travel Delay - Up to £500 per Insured Person where delay in excess of 6 hours caused by strike, breakdown or weather conditions

Hi-Jack and Kidnap - £250 per day up to a maximum period of 50 days

Personal Liability - up to £5,000,000

Overseas Legal Expenses - up to £50,000

## <u>SIGNIFICANT EXCLUSIONS</u> - (See General Exclusions and the Specific Exclusions under each section of the Policy document)

Insured Persons engaging in active service with the Armed Forces of any nation, war within the Insured Person's country of permanent residence, Insured Persons over the age of 80, Insured Persons travelling against the advice of a medical practitioner, Suicide or intentionally inflicting self-injury, engaging in flying or other aerial activity except as a passenger, Any in-patient hospital treatment or emergency Repatriation Expenses incurred without the approval of Chubb Assistance. Loss of Personal Property not reported to the police, transport carrier or other authority within 48 hours of discovery.

#### CANCELLATION

The Policy may be cancelled by the Insured by giving the Company 30 days prior written notice. The Policy may be cancelled by the Company by giving the Insured 30 days prior written notice to the last known address of the Insured except that five days prior written notice will be given when cancellation is for non-payment of premium. Notice shall be made via recorded delivery.

#### CHUBB ASSISTANCE

Phone	+44 207 895 3364	Email:	medicalassistance@ chubb.com
Group Policyholder	Coventry City Council	Policy Number.	64817713

Chubb Assistance is designed to provide children, teachers and other accompanying adults with advice and assistance should they become ill or sustain injury during a journey abroad.

Chubb Assistance is manned 24 hours a day, 365 days a year by multi-lingual assistance coordinators, experienced in managing medical assistance cases with hospitals and clinics worldwide.

Chubb Assistance has the resources to provide repatriation by air ambulance or scheduled services depending on the circumstances and this can include a fully qualified escort.

Chubb Assistance includes a highly qualified team if medical consultants and nursing staff, on hand at any time to coordinate any medical assistance cases, arranging hospital admissions and ensuring that the most appropriate treatment is provided.

Chubb Assistance has the ability to arrange direct billing with a network of hospitals and clinics worldwide, which guarantees the payment for treatment provided.

When using Chubb Assistance please make sure you have the following information available:

- $\mathbf{x}$ The name of the Group Policyholder, School and Policy number.
- X The telephone or facsimile number where an Insured Person can be contacted.
- X The Insured Person's address abroad.
- X The nature of the emergency or the assistance required.

#### PLEASE REMEMBER

- The teacher/leader should always carry this Summary and a copy of the E Assistance card
- $\mathbf{x}$ Keep a separate record of the telephone and email address.
- X Give details to a travelling friend, relative or colleague just in case they are unable to make the call themselves..
- X Always contact Chubb Assistance before incurring substantial expenses.

#### CLAIMS PROVISIONS

In the event of a claim, the Insured or the Insured Person shall give notice by the most expeditious means to the following address:

Chubb Insurance Company of Europe SE, 106 Fenchurch Street, London, EC3M 5NB

Telephone - 020 7956 5000 or E mail - cahukclaims@chubb.com confirming the facts in writing, with as much information as possible and quoting the policy number.

#### COMPLAINTS PROCEDURES

Any complaint should in the first instance be addressed to the intermediary who arranged the Policy or alternatively contact the Accident & Health Manager. Should the matter not be resolved to your satisfaction, write to the Managing Director of Chubb. They can be contacted at the following address:

Chubb Insurance Company of Europe SE 106 Fenchurch Street London EC3M 5NB

Telephone 020 7956 5000

Should you remain dissatisfied you may have the right to refer the matter to the Financial Ombudsman Service at:

183 Marsh Wall London E14 9SR

Telephone: 0207 964 1000

Alternatively you may contact The Association of British Insurers (ABI) for assistance:

The Association of British Insurers Consumer Information Department 51 Gresham Street, London, EC2V 7HQ

Telephone 0207 600 3333

Following these procedures will not affect your legal rights.

The Policy shall be governed by, and construed in accordance with, the law of England and Wales.

#### FINANCIAL SERVICES COMPENSATION SCHEME

Chubb subscribes to the Financial Services Compensation Scheme, This provides compensation in case any of its members, in specified circumstances, are unable to meet any valid claims under their policies. The first £2,000 of a claim is protected in full. Above this threshold, 90% of the remainder of the claim will be met (100% if the insurance is legally compulsory). Compensation will only be available to commercial customers in limited circumstances. Further information can be obtained from Chubb at the address above, or from the Financial Services Compensation Scheme at the following address:

Financial Services Compensation Scheme, 7th Floor, Lloyds Chambers,

1 Portsoken Street, London E1 8BN Tel: 020 7892 7300 Version 4 18/12/2013