

**CHILDREN'S SERVICES OVERVIEW AND SCRUTINY  
COMMITTEE**

**COOMBES SCHOOL  
TASK AND FINISH GROUP**

**REPORT AND RECOMMENDATIONS**

**JANUARY 2017**

**Task and Finish Group Members:**

**Councillor John Kaiser (Chairman)  
Councillor Pauline Helliard-Symons (Vice-Chairman)  
Councillor Gary Cowan  
Councillor Richard Dolinski  
Councillor Lindsay Ferris  
Councillor Shahid Younis**

## **CONTENTS**

<b>Section 1</b>	<b>Introduction and Background to the Review</b>	<b>3</b>
<b>Section 2</b>	<b>Terms of Reference for the Review</b>	<b>4</b>
<b>Section 3</b>	<b>Overall Review Conclusions</b>	<b>5-9</b>
<b>Section 4</b>	<b>Recommendations</b>	<b>10</b>
<b>Appendix 1</b>	<b>Summary of Ofsted Findings</b>	<b>12</b>
<b>Appendix 2</b>	<b>List of Witnesses</b>	<b>13</b>
<b>Appendix 3</b>	<b>List of background information provided to the Task and Finish Group</b>	<b>13</b>

## Section 1 Introduction and Background to the Review

The Coombes School Task and Finish Group was set up by the Children's Services Overview and Scrutiny Committee at its meeting on 28 June 2016. The Coombes School was rated '*inadequate*' by the Ofsted inspection which took place on 17-18 May 2016. This result triggered the process to turn the school into an academy. A summary of the findings from the Ofsted inspection is set out at Appendix 1.

The Coombes Church of England Primary School opened on 1 September 2008 and is the result of the amalgamation of The Coombes Infant and Nursery School (founded in 1971) and Arborfield Newland & Barkham CE Junior School (founded in 1863). Children are drawn from the villages of Arborfield and Barkham, including Arborfield Garrison and the many new housing developments in our area.

The school is larger than the average primary school with 550 pupils on the school roll at the time of the Ofsted inspection. The school has relatively few disadvantaged pupils and the proportion of pupils from minority ethnic groups is below the national average. Few pupils speak English as an additional language and the proportion of pupils with special educational needs or disability is also below the national average.

The Coombes School had been rated 'good' at its previous inspection in September 2011. The Group wanted to understand how a school that was highly regarded by the community and external inspectors had fallen into special measures.

There was concern that the relevant local ward Member was not informed at an early stage that the school was in danger of not achieving a good Ofsted result. Members felt that it was possible that the local ward Member may have been able to intervene positively for a better outcome for the school.

The Group wanted to discover how the events unfolded leading to this unsatisfactory result. The Group's aim was to prevent the same situation from happening to other schools in the Borough.

There were a number of questions to be answered, but in particular the Committee wanted to find out:

- What the Local Authority's involvement with the school was?
- What could have been done to prevent this situation?
- Why weren't the relevant local ward Members informed at an earlier stage that the school was underachieving and at risk of being rated 'inadequate'?

The Task and Finish Group had its first meeting on 3 August 2016. At that meeting the Group agreed: the terms of reference; the dates of future meetings; the witnesses to be called and the questions to be asked.

The Group held six meetings:

- 3 August 2016
- 18 August 2016
- 21 September 2016
- 5 October 2016

- 20 October 2016
- 16 November 2016

## **Section 2 Terms of Reference for the Review**

### **Purpose of Review:**

- |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <ol style="list-style-type: none"> <li>1. To identify the reasons that led to the Coombes School's current situation.</li> <li>2. To identify the Local Authority's level of involvement with the school and to find out what could have been done to avoid the current situation.</li> <li>3. To identify what lessons can be learnt to prevent the same happening to other schools in the Borough.</li> <li>4. To propose that a mechanism is developed to keep local ward Members informed if a school in their ward is in danger of falling standards.</li> </ol> |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|

### **Key Objectives:**

- |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <ol style="list-style-type: none"> <li>1. To understand the events and the reasons that led the Coombes School to its Ofsted inspection result of 'Inadequate'.</li> <li>2. To find out how the Local Authority supported the school or how it could have supported the school to prevent the unsatisfactory Ofsted result.</li> <li>3. To prevent what happened to the Coombes School from happening to other schools.</li> <li>4. To develop a system to keep local ward Members informed of the schools' performance in their ward, in particular early warning if a particular school is in danger of underperforming.</li> </ol> |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|

### **SPECIFIC QUESTIONS FOR THE TASK AND FINISH GROUP TO ADDRESS:**

- |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <ol style="list-style-type: none"> <li>1. Who appointed the Headteachers and did they know about the appointees' records?</li> <li>2. Did the Governors consult the Local Authority during the process of appointing Headteachers?</li> <li>3. Were any of the appointments based on recommendations?</li> <li>4. What influence does the Local Authority have in appointing Headteachers in local schools?</li> <li>5. If the Local Authority gave advice, did the school take it?</li> <li>6. What degree of help can the Local Authority offer a struggling school?</li> <li>7. Details of the recruitment process.</li> <li>8. What training is offered by the Local Authority to Governing Bodies?</li> <li>9. Did the Governing Body at the Coombes take the training offered?</li> <li>10. What is the leadership structure of the school?</li> <li>11. What is each leader's responsibility?</li> </ol> |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|

- |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <ol style="list-style-type: none"><li>12. How long have the Governors been on the Board? Particularly the Chair of Governors?</li><li>13. Are any of the Governors appointed by the Local Authority?</li><li>14. Does the Coombes Governing Body belong to the association of Governors?</li><li>15. Is there a programme for recruiting Governors?</li><li>16. How did the school use the Pupil Premium funding for disadvantaged pupils?</li><li>17. Why did the school employ a consultant Headteacher instead of an interim Headteacher?</li><li>18. What efforts were made to appoint a permanent Headteacher?</li><li>19. Why was the deputy Headteacher not considered for the job?</li><li>20. Did the school engage with a school improvement partner since its last inspection?</li></ol> |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|

### **Section 3 Overall Review Conclusions**

#### **3.1 Headteacher Recruitment**

Following their investigations the Group concluded that the Headteacher recruitment process could be strengthened. The Local Authority should draw up a *'Headteacher Recruitment Guideline'* to help governing bodies through the recruitment process. The Coombes School's governors had used an agency to recruit Headteachers. However, the agency failed to report to the governors that one of the interim Headteachers had previously worked at a failing school. As a result the Group recommends that governors be advised to check references and not rely solely on agencies. A follow-up telephone call should be made to confirm references before any formal appointment is made.

The Group found that it was confusing to have titles such as 'executive' or 'consultant' Headteacher. These titles created uncertainty as to who was leading the school. It was important to establish a clear line of leadership that did not cause any confusion. The interim Headteacher must assume the responsibility for leading the school during an inspection as a part of their role and this must be made clear at the time of appointment.

The Group felt that the lack of a suitable permanent full time Headteacher for a prolonged period of time was the main reason for the Coombes School's deterioration.

Partnership arrangements with other schools should be actively encouraged, especially when a school is failing to recruit senior staff and failing to meet targets.

#### **3.2 Local Authority's Involvement**

The Government is encouraging schools to be more autonomous by becoming academies. Although the Local Authority has limited powers in relation to academies, it has overall responsibility for the educational outcomes for children in the Borough. The Local Authority also plays a role in promoting good Ofsted results.

The Group was informed that the Local Authority has the power to issue a *Warning Notice*; this is a statutory vehicle which triggers intervention by the Local Authority. Should a warning notice be issued, Ofsted would have to be informed. A warning notice has the same powers as Ofsted and would overtake the management of the school from the governors.

It was revealed that an initial '*pre-warning notice*' had been issued to the Coombes School by the Local Authority (Wokingham Borough Council) in 2014. However, the Headteacher at the time did not share this information with the governing body. That had been the first indication that the school was underperforming. The Group recommends that, when issuing such notices, the Local Authority should send letters to the chair of governors, governors, Headteacher, church representative and local ward Member/s. These letters should be sent to home addresses to avoid the risk of them not reaching their intended recipients.

The school received another *pre-warning notice* in 2015. It appears that the Council officers involved in the issue of the 2<sup>nd</sup> pre-warning letter were not aware of the previous letter. The 2<sup>nd</sup> letter was issued when budget deficits in targets were identified. The Local Authority regularly held School Improvement Board meetings where schools were monitored according to their performance. Once the Local Authority established that the Coombes was underachieving and 'required improvement' a School Improvement Officer started to support the school by spending one day a week at the school.

The Group was informed that a School Improvement Board was set up to discuss ways to improve the school.

Due to the fact that school underperformance is a sensitive issue, it is common practice to keep it confidential. However, the Group decided that it is important that the Children's Services Overview and Scrutiny Committee be informed as soon as a school starts to cause concern. The Group recommends that this information be shared with the relevant local ward Member/s with an invitation for him/her to attend the Committee meeting for discussion. Such discussions would be treated as confidential and discussed in Part 2 session.

It was noted throughout the investigations that the Local Authority had given support to the school. The school valued the help that was given to them by different Officers from the Council. However, the Group concluded that more clarity around the role of the School Improvement Officer was necessary. The Group could not identify a coherent plan/strategy for improvement from the Local Authority. It was not clear what impact, if any, the School Improvement Officer had on the school's overall performance.

The Ofsted inspection report stated:

"The Local Authority recognised that the school needed significant support and put in place an improvement board to hold the leaders and governors to account. However, the Local Authority has been too optimistic about the impact of the recent change in leadership".

### **3.3           Governors**

The Group was informed that the governing body at the Coombes had undertaken all the necessary training that was available through Wokingham Borough Council.

The Chair of Governors had additionally undertaken the National College for Teaching and Leadership - Chair of Governors Leadership Development Programme (September 2013 - certificate issued), sponsored by Wokingham Borough Council.

The Group was informed that a meeting had taken place at Wokingham Borough Council with the Chair of Governors from the Coombes, the Chair of Governors from Whiteknights Primary School, Alan Stubbersfield (Interim Head of Learning and Achievement), Gill Walker (School Improvement Officer) and Francois Walker (Consultant Headteacher). The purpose of this meeting was to attempt to agree a working arrangement for Francois Walker to continue working at both schools. The Group was concerned that no minutes were taken at this meeting.

The Group noted that the governors were committed and passionate about the school and wanted the school to perform well. However, it was not clear whether the governing body had the necessary skills to understand what the current Ofsted requirements were.

The Ofsted inspection report stated:

“Despite taking some steps to improve, the governing body is not effective. For example, governors have not ensured that the pupil premium funding has been spent well. Furthermore the quality of teaching and learning has declined because the governors have not developed a clear strategy for improvement to smooth the transition of successive school leaders. Although governors visit the school and ask leaders some questions, they do not hold leaders to account enough. This is because governors do not have an accurate understanding of the school’s effectiveness. Not all governors show that they understand pupils’ progress information well enough.”

It was reported to the Group that the governors had been reluctant to accept that the school required improvement. There was a belief that the Coombes ‘culture’ had to be preserved. This resistance to modernise meant the school did not keep up with the changes in the educational system and no longer satisfied the stricter current Ofsted requirements.

Members were informed that the governors tended to use business comparisons rather than educational outcomes and had not fully appreciated how serious the situation was. The Group agreed with the view that the governors’ role in a school should be strategic and not operational. It was not clear from the investigation if this was the case at the Coombes School.

### 3.4 Coombes School - Headteacher Timeline

Sept 2008 – April 2010 Amalgamation	<b>Sue Rowe</b> Headteacher
April 2010 – April 2014	<b>Patrick Pritchett</b> – Acting Headteacher until his formal appointment in February 2011
2013/2014	<b>Neil Lyddiatt</b> Acting Headteacher – previously Deputy Headteacher
2014/2015	<b>Matt Dickson</b> Interim Headteacher
Summer 2015	<b>Francois Walker</b> (Whiteknights School) began supporting the school
July 2015	<b>Marion Standing</b> Interim Headteacher – Francois Walker continued supporting the school

December 2015	<b>Marion Standing</b> left and <b>Francois Walker</b> appointed Consultant Head effective January 2016 for two terms
Following inspection in June 2016	<b>Charlie Morris</b> Interim Head – contract until July 2017

Note: Throughout this period Neil Lyddiatt was the deputy Headteacher or acting Headteacher.

A period of turbulence at the school began when the school failed to secure a permanent full time Headteacher following Patrick Pritchett's departure in April 2014. During the subsequent two year period (running up to the Ofsted inspection in May 2016) the Group were informed of a number of issues at the school, including:

- Challenging working relationships between one of the Interim Headteachers and the governors;
- Difficulties in implementing improvement measures;
- A lack of clear direction and support for teachers at the school;
- Increased levels of anxiety and sickness amongst teaching staff;
- Experienced teachers leaving the school to take up other posts.

The Ofsted inspection report stated:

“There has been much turbulence in leadership for the past two years. Some important national developments have not been implemented in the school. Governors have had no strategy to secure improvements. Consequently, the quality of teaching has declined significantly”.

Francois Walker was brought in as a consultant Head teacher on a temporary basis, sharing his time between the Coombes and Whiteknights. Francois was able to identify what needed to be done at the school. Staff, governors and the Local Authority had confidence in his leadership. It was believed that because he was also an Ofsted inspector, he would be able to prepare the school for the imminent inspection.

Francois' first task was to ensure that staff safeguarding training was up to date. The Group was informed that staff had not received any safeguarding training for three years.

The Coombes was unable to secure an extension to Francois' contract partnership arrangement with Whiteknights. One of the main criticisms of the Ofsted report was the lack of secure leadership. It was possible that, if a permanent Headteacher with a clear vision for the school had been in place, the Ofsted result would have been more positive.

The Group was informed that the school was advised by Francois Walker to seek a partner school to secure an Executive Headteacher prior to the Ofsted inspection, but the governors did not act upon this advice. The Group noted that Francois Walker's work with Ofsted prevented him from being associated with a failing school and that this made it difficult for Francois to lead the school effectively through the Ofsted inspection.

After the inspection Francois Walker left the school to be replaced by Charlie Morris in the role of Interim Headteacher. Charlie identified a number of problem areas that needed improving in the school:

- Weak teaching
- Weak senior and middle management
- Passive children/uninspiring classes.

Charlie Morris reported that a significant number of teachers had left the school and it had been a challenge to recruit new staff. In Charlie's view there was a unique charm about the school, but it was absolutely necessary to modernise and eradicate certain practices.

Charlie's contract runs until July 2017 and the school is still seeking to recruit a permanent Headteacher. The school is now looking to join an academy trust. It is possible that a trust will be able to secure a permanent Headteacher for the school.

Throughout this period Neil Lyddiatt was either Deputy Headteacher or acting Headteacher. Neil is well respected by staff and governors at the school having given many years of excellent service. All the Headteachers spoke highly of him and he has the support of the majority of parents. Neil informed the Group that he recognised that changes were needed to bring the school up to date with the current Ofsted requirements.

### **3.5 Ofsted Inspection**

It is evident from the various interviews that the school was not fully prepared for the Ofsted inspection. The school staff were not trained for an Ofsted inspection and secure leadership was not in place. A significant issue was the fact that data was not readily available when Ofsted requested it.

It seems that the governors, school staff and the Local Authority all relied on Francois Walker to prepare the school for the inspection. However, for the reasons outlined above, when this did not happen, no-one was able to intervene. The Local Authority allocated School Improvement Officer seemed to be unaware that this was the case until after the inspection was over.

The Group noted that, as highlighted above, one of the main criticisms in the report was the lack of secure leadership for the school. The Ofsted inspection report stated:

“Frequent changes to leadership have meant that teachers have not received adequate feedback or direction to enable the quality of teaching to improve. Instability in staffing has led to pupils' learning being disrupted. Consequently, pupils across the school are making slow progress.”

Once the school was rated 'inadequate', the management of the school was taken away from the governors and an Interim Executive Board (IEB) was formed. An IEB is a small body appointed on a short term basis by the Department for Education with the aim of turning around a school that is judged to be in urgent need of improvement. None of the former governors is a member the IEB. The school is currently seeking to join a trust in order to become an academy.

#### **Section 4 Recommendations to the Council's Executive**

1. That the Children's Services team develop an action plan to address the learning points arising out of the Task and Finish Group report and the Ofsted inspection of the Coombes Primary school in 2016.
2. That the action plan be submitted to the Children's Services Overview and Scrutiny Committee for consideration and be reviewed at future meetings of the Committee.
3. That the Children's Services Overview and Scrutiny Committee review the role of the Council's School Improvement Officers, to gain a better understanding and to discuss measures to improve communication and liaison with ward Members.
4. That any plans/strategies developed by School Improvement Officers be agreed by school management, governors and the Local Authority and be reported to the Children's Services Overview and Scrutiny Committee, such plans to be monitored and reported together with follow up actions.
5. That any relevant reports from the Local Authority, especially reports from the School Improvement Officer, be circulated to the home address of:
  - All governors
  - Headteacher
  - Church representative
  - Local ward Members.
6. That once a school receives a preliminary warning letter, a report and a copy of the warning letter be sent immediately to:
  - The Executive Member for Children's Services and his/her Deputy;
  - The Chairman and Vice-chairman of the Children's Services Overview and Scrutiny Committee;
  - The local ward Member/s.
7. That a regular report be submitted to the Children's Services Overview and Scrutiny Committee and the relevant local ward Member/s on the progress of any school that has received a preliminary warning letter from the Local Authority or has gone into special measures following an Ofsted inspection. The local ward Member/s also to be invited to attend the Committee meeting at which the matter would be discussed;
8. That school governing bodies be encouraged to follow the National College for School Leadership guide to recruiting and selecting Headteachers.
9. That school governing bodies be encouraged to adopt a more robust Headteacher recruitment process, including a telephone call from the Chair of Governors to follow up references with any such contact being evidenced in writing;

10. That the Children's Services team develop and adopt guidelines for governors to follow in regard to Headteacher recruitment.
11. That school governing bodies be encouraged to ensure that no candidate who has a potential conflict of interest be appointed to a Headteacher role, on a full time or interim basis.
12. That, when a Headteacher, temporary or full time, is appointed he/she must be able to commit to taking overall responsibility for the school before and during an Ofsted inspection (whether this be a consultant, executive, interim or acting Headteacher role).
13. That, to avoid confusion, the Children's Services team develop and circulate a clear definition of the different designations of Headteachers, i.e:
  - consultant
  - interim
  - executive
  - acting.
14. That all meetings that involve Local Authority Officers, Governors and Headteachers must have minutes taken.
15. That the Local Authority ensures that child protection procedures and safeguarding training in schools are up to date.
16. That schools be encouraged to develop a clear line of leadership responsibility with regards to the strategic and operational aspects of the school.
17. That school governors be encouraged to attend training to ensure they clearly understand Ofsted's latest requirements and are better able to hold school leaders to account.

## **Appendix 1 - Summary of Ofsted Findings**

- There has been much turbulence in leadership for the past two years. Some important national developments have not been implemented in the school. Governors have had no strategy to secure improvements. Consequently, the quality of teaching has declined significantly.
- Not enough pupils across the school are making expected progress in English and mathematics. The curriculum is inadequate and teachers' expectations of pupils are not high enough.
- Teachers' assessments of pupils are not accurate as they do not have a thorough understanding of the national curriculum.
- Lessons do not enable pupils of different abilities and groups to succeed. Teachers do not use their knowledge of pupils to plan suitably challenging tasks.
- Children in the early years are not making enough progress because teaching does not effectively promote learning. Activities in the indoor and outdoor provision do not cover all of the areas of learning.
- Disadvantaged pupils underachieve. Leaders have not spent the pupil premium effectively.
- Leaders have not identified the most able pupils. No provision is made for this group.
- Pupils who have special educational needs or disability make even less progress than other pupils. Extra support is not effective.
- Equal opportunities are not well promoted. Pupils do not have equal chances to achieve.
- Governors and some leaders have an inaccurate understanding of the school's effectiveness. They do not understand pupils' progress information well enough so they cannot use this to hold others to account.
- Opportunities to develop pupils' social, moral, spiritual and cultural understanding and knowledge of British values are not embedded. Pupils are not well prepared for life in modern Britain.
- Not all adults are applying the new expectations of pupils' behaviour well enough.

### **The school has the following strengths:**

- The consultant headteacher has recently introduced important changes and helpful new systems. It is too early to see the impact of these.

- Relationships between adults and pupils are strong. Safeguarding is effective because adults' prioritise pupils' welfare.

## Appendix 2 – List of Witnesses

Witness	Meeting
<ul style="list-style-type: none"> <li>• Alan Stubbersfield, Interim Head of Learning and Achievement</li> </ul>	18 August 2016
<ul style="list-style-type: none"> <li>• Carole Craven, Chair of Governors</li> </ul>	21 September 2016
<ul style="list-style-type: none"> <li>• Francois Walker, Consultant Headteacher</li> <li>• Charlie Morris, Interim Head teacher</li> </ul>	5 October 2016
<ul style="list-style-type: none"> <li>• Neil Lyddiatt, Deputy Headteacher and Acting Headteacher</li> <li>• Gill Walker, School Improvement Officer</li> </ul>	20 October 2016

## Appendix 3 - List of Background Information Provided to the Task and Finish Group

- 1) Headteacher Timeline.
- 2) Governing Body Composition and Length of Service.
- 3) Email from Vicky Lewendon, Governor Services Manager.
- 4) Minutes of Governing Body's meetings.
- 5) Minutes of Children and Learning Committee Meetings.
- 6) Minutes of Strategy and Planning Committee.
- 7) Various documents supplied by Carole Craven:
  - a) Email correspondence regarding letter of concern
  - b) Headteacher Performance Management Planning
  - c) Headteacher Recruitment meeting
  - d) Newsletter to parents
  - e) Planning Improvement Plan
  - f) Candidates timetable
  - g) Parents and the Community Panel Questions
  - h) Leadership and Management Panel Questions
  - i) Teaching and Learning Panel Questions
  - j) Consultation Response
  - k) Factual accuracy check
  - l) Coombes 2015 Inspection Dashboard
  - m) Leadership summary 2016.
- 8) Email from Francois Walker to Carole Craven dated 8 May 2016.

Please note that some of these background documents may contain exempt information and, therefore, may not be publicly available.