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Agenda Item No.6(y)

DERBYSHIRE COUNTY COUNCIL

CABINET

11 March 2021

**Joint Report of the Executive Director for Children's Services and
Director of Legal Services**

**Report on the COVID19 Testing Programmes in Maintained Schools with
Secondary Aged Children (A) and Primary Aged Children (Including
Maintained Nursery Schools) (B)**

1. Purpose of the Report

To report to Cabinet about the arrangements for COVID19 testing programmes in maintained schools with secondary aged children and schools with primary aged children, and maintained nursery schools.

2. Information and Analysis

(A) On 15 December 2020, the Department for Education (DfE) announced their intention to introduce a staff and student COVID-19 testing programme for schools with secondary age children. Over the Christmas period 2020, the DfE released more information about the programme and with an introduction date of week beginning 4 January 2021 if schools were ready to do so. The purpose of the voluntary programme was to identify asymptomatic staff or students and to require them to self-isolate which in turn will reduce the spread of the virus, protect the most vulnerable and drive down the infection rate across the county area of Derbyshire (excluding Derby City).

The testing programme is a supervised self-administered programme which is to be undertaken on school sites. Whilst the

DfE provided support materials and webinars for schools, Derbyshire County Council initially advised maintained schools with secondary age students to pause the introduction of the programme pending:

- clarification with regards to insurance since maintained schools had no insurance in place for this activity (self-administered tests and administered swabbing), a significant excess falls to Derbyshire County Council to cover in the event of a claim. Similarly, there is no insurance cover in place for Derbyshire maintained schools in the event of a data protection breach and, therefore, this posed a further financial risk to the Council;
- whilst the DfE guidance includes provision for serial testing to release pupils from self-isolation, the legislation does not currently allow for direct contacts to cease isolation if they are taking part in serial testing, therefore, the legal basis was not clear.

The Council has sought to mitigate these risks completely by seeking a letter of comfort from the Department for Education which replicates the indemnities provided in the letter of comfort received from the Secretary of State for Health when the Council commenced community testing, however, this has not been forthcoming. Whilst the DfE has still not provided a letter of comfort, the Council will continue to pursue the Department for Education for this. Further enquiries are also being made to establish whether the letter of comfort received from the Secretary of State for Health for community testing extends to testing in schools.

In the meantime, the Council has balanced the current risk and in consideration of the attached risk assessment has determined that the public health risk of not approving the roll out of self-administered testing in Derbyshire County Council maintained schools with secondary age students outweighs the financial risk of proceeding with the testing. This was agreed by Corporate Management Team (CMT) on 18 January 2021 (**Appendix A**).

- (B)** On 18 January 2021, the DfE launched several webinars for schools with primary age children to learn about the government's strategy for primary school staff testing, including testing of staff in maintained nursery schools. This is a home testing strategy whereby staff use tests twice per week at home and not on a school site. No primary age children should be tested although the government is investigating whether this should be extended to primary age children at some time in the future. The purpose of this testing strategy is to identify asymptomatic staff and to require them to take a confirmatory

PCR COVID-19 test to determine whether they are carrying the virus, which in turn will reduce the spread of the virus, protect the most vulnerable and drive down the infection rate across the county area of Derbyshire (excluding Derby City).

During the week of 18 January 2021, the DfE released training materials and guidance for primary schools and testing kits were dispatched to schools to start testing from the week beginning 25 January 2021 if they were ready to do so. After initially advising primary schools to pause whilst the Council further investigated issues such as insurance, staff and pupil isolation, human resources issues in schools, the recommendation was that schools start when they are ready to do so.

The testing must be carried out in accordance with DfE guidance, standard operating procedures and mitigation measures set out in the risk assessment.

Derbyshire's maintained schools now have insurance in place for this activity (self-administered tests), although there is a significant excess which falls to the Council to cover in the event of a claim. The Council needs to balance the risk of claims (financial and reputational) against the risk of not proceeding with the testing (public health and reputational).

There is no insurance cover in place for Derbyshire's maintained schools with primary age children in the event of a data protection breach and, therefore, this poses a further financial risk to the Council.

As with secondary school testing the Council has sought to mitigate these risks completely by seeking a letter of comfort from the Department for Education, this has similarly not been forthcoming.

In the meantime, the Council has balanced the current risk and in consideration of the attached risk assessment has determined that the public health risk of not approving the roll out of self-administered testing for staff in Derbyshire's maintained primary schools and maintained bursary schools outweighs the financial risk of proceeding with the testing. This was agreed by CMT on 1 February 2021 (**Appendix B**).

3. Financial Considerations

The costs associated with the testing of children in school will be met from either government, through the supply of testing kits, or the school

themselves in terms of the administration of the tests. The liability which may fall on the council, rather than schools delegated budgets, is associated with any potential claim against the excess that exists on its insurance policy. Whilst the excess per claim is £1m it is not considered likely that any liability that may arise would be significant due to the self-administered nature of the testing approved within this report.

4. Legal Considerations.

The Council's Constitution provides that "notwithstanding any other provision of the Constitution, Strategic Directors shall have the power, after discussion, if practicable, with the Leader of the Council or the relevant Cabinet Member or Chair, to take such actions deemed to be necessary and expedient in matters requiring urgent consideration and which, because of the timescale involved, or the need to safeguard the interests of the County Council, cannot be dealt with by submission to the next following meeting of the Council, Cabinet, Cabinet Member or Committee."

The Improvement and Scrutiny Procedure Rules states:

"13(6) The call-in procedure set out above shall not apply where the decision being taken by Cabinet is urgent. A decision will be urgent if any delay likely to be caused by the call-in process would seriously prejudice the Council's or the public interest. All reports recommending that decisions be taken should say whether or not it is proposed that call-in be waived. The record of the decision, and notice by which it is made public, shall state whether in the opinion of the decision-making person or body, the decision is an urgent one, and, therefore, not subject to call-in. The Chairman of the appropriate Improvement and Scrutiny Committee should agree both the decision proposed is reasonable in all the circumstances and to it being treated as a matter of urgency. Decisions taken as a matter of urgency should be reported to the next available meeting of the Council, together with the reasons for urgency."

The Council has powers in accordance with S1-6 of the Localism Act 2011 to do that which will be to the 'benefit of the authority, its area or persons resident or present in its area.' The proposed benefit of this action is to identify those pupils identifying as asymptomatic whilst having Covid-19 and to thereby reduce the spread of the infection.

It is important that schools process the data related to this exercise appropriately and undertake their roles as Data Controllers effectively. The DfE have been asked to provide their Data Privacy Impact Assessment and their Legitimate Interest Assessment so that these can be shared with schools to assist in their own assessments relating to data privacy.

Schools are also being supported in relation to the effective use of consent forms to ensure that consent is appropriately obtained and that information necessary to support safe testing is available at the point of testing.

In relation to the secondary school testing it is proposed that only the self – administered testing should commence initially. It is acknowledged that some persons with protected characteristics may not therefore be able to benefit from the education-based testing regime which may in turn impact adversely on their access to educational provision. The council continues to seek clarification from the Department for Education in relation to the procedures to be employed to administer the testing safely and to identify processes by which all children and staff can benefit from testing. The council is aware that some school leaders have expressed concerns as to how their staff and volunteers are able to administer the tests safely and do not consider they are in a position to commence any other than self- administered testing at present.

An equalities impact assessment should be undertaken promptly to ensure that any adverse impact can be fully identified, and mitigations put in place.

5. Human Resource Considerations

Testing will be made available to all staff members in school. However, it is purely voluntary whether staff wish to participate in the testing or not and therefore is not a condition of their employment.

For schools with secondary age children, the DfE guidance advised them to assemble a team to carry out the testing consisting of seven different roles. Four roles to be performed by existing school staff and the remaining roles resourced from volunteers from the wider school community or agencies where required. Maintained schools have been advised of appropriate rates of pay where remuneration is required for undertaking a role.

For schools with primary age children and Nursery Schools, the DfE identified two roles within school to support the testing programme of 'COVID-19 Co-ordinator and 'Registration Assistant'. The guidance envisaged that as the burden to support testing was much lighter than in secondary schools the responsibilities could be fulfilled as part of existing roles already within the school and could be performed by one person.

The DfE have made training available to staff in schools with primary age children and Nursery Schools on how to carry out the lateral flow test

correctly which staff will need to access prior to commencing the testing which is designed to be undertaken at home.

All members of the 'testing team' in schools with secondary age children will need to have completed the training before commencing their role in the testing.

6. Executive Director's Recommendation

It is recommended that Cabinet receive the report and note the decision to progress with self – administered COVID-19 testing in maintained schools with secondary age students for staff and pupils and maintained schools with primary age children and maintained nursery schools (staff only).

**Jane Parfremment
Executive Director
Children's Services**

**Helen Barrington
Director of Legal Services**

**DERBYSHIRE COUNTY COUNCIL
OFFICER DECISION AND DECISION REVIEW RECORD**

Officer: Jane Parfremment <i>*For emergency powers, this would be the Executive Director</i>		Service: Children's Services
Delegated Power Being Exercised: <i>*The delegation detailed in the Constitution to the specified officer or emergency powers</i>		
Subject of Decision: (i.e. services affected)	Lateral Flow Device (LFD) Testing in DCC Schools	
Is this a review of a decision? If so, what was the date of the original decision?	No	
Key decision? If so have Democratic Services been notified?	No	
Decision Taken (specify precise details, including the period over which the decision will be in place and when it will be (further) reviewed):	<p>To provide schools with secondary age students which are maintained by DCC with authority to proceed with general asymptomatic twice weekly self-administered LFD testing for students and staff without waiting for the DfE letter of comfort.</p> <p>The testing can start with immediate effect and must be carried out in accordance with DfE guidance, standard operating procedures and mitigation measures set out in the attached risk assessment.</p> <p>To be reviewed in two weeks to review incidents and processes.</p>	
Reasons for the Decision (specify all reasons for taking the decisions including where necessary reference to Council policy and anticipated impact of the decision) Where the decision is subject to statutory guidance please state how this has been taken into consideration.	<p>To identify asymptomatic staff or students and to require them to self-isolate which in turn will reduce the spread of the virus, protect the most vulnerable and drive down the infection rate across the county area of Derbyshire (excluding Derby City). Pilots have shown how rapid testing can be used effectively and have positive impacts in schools and colleges.</p>	

<p>Alternative Options Considered (if appropriate) and reasons for rejection of other options</p>	<p>Continue to advise the schools to wait for DfE letter of comfort until testing can commence.</p> <p>This could lead to:</p> <ul style="list-style-type: none"> • Internal political reputational damage • schools starting to test anyway without DCC control or guidance • increased spread of COVID within school settings • increased risk of teacher's absence • lessons impacted • Academies seen as on front foot <p>The risk of delaying LFD testing is slightly higher than the risks associated with testing.</p> <p>To support daily LFD testing of pupils in England, specifically to prevent whole year groups from having to self-isolate (serial testing). However, this is not proposed for the following reasons:</p> <ul style="list-style-type: none"> • LFD tests are not licensed for serial testing in this way by the regulator (the Medicines and Healthcare Products Regulatory Agency) • Whilst the DfE guidance includes provision for serial testing to release pupils from self-isolation, the legislation does not currently allow for direct contacts to cease isolation if they are taking part in serial testing, therefore the legal basis is not clear • From a Public Health perspective – PHE East Midlands has confirmed that direct contacts in school settings should not be advised to stop self-isolating if they are participating in serial LFD testing • NHS Test and Trace are offering the correct advice in relation to self-isolation as the national public health guidance stands and within the current legislative/legal context
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<p>Has a risk assessment been conducted ?- if so what are the potential adverse impacts identified and how will these be mitigated?</p>	<div data-bbox="810 192 874 259" data-label="Image"> </div> <div data-bbox="734 259 954 320" data-label="Text"> <p>2021 01 10 LFT School Setting Risk .</p> </div> <div data-bbox="722 369 1385 728" data-label="Text"> <p>DCC schools have insurance in place for this activity (self-administered tests and administered swabbing), although there is a significant excess which falls to DCC to cover in the event of a claim. The Council needs to balance the risk of claims (financial and reputational) against the risk of not proceeding with the testing (public health and reputational).</p> </div> <div data-bbox="722 766 1393 922" data-label="Text"> <p>There is no insurance cover in place for DCC schools in the event of a data protection breach and therefore this poses a further financial risk to the Council.</p> </div> <div data-bbox="722 963 1372 1599" data-label="Text"> <p>The Council has sought to mitigate these risks completely by seeking a letter of comfort from the Department for Education which replicates the indemnities provided in the letter of comfort received from the Secretary of State for Health when the Council commenced community testing, however this has not been forthcoming. The Council will continue to pursue the Department for Education for the letter of comfort. Further enquiries are also being made to establish whether the letter of comfort received from the Secretary of State for Health extends to testing in schools.</p> </div> <div data-bbox="722 1637 1390 1957" data-label="Text"> <p>In the meantime, the Council has balanced the current risk and in consideration of the attached risk assessment has determined that the public health risk of not approving the roll out of self-administered testing in DCC secondary schools outweighs the financial risk of proceeding with the testing.</p> </div>
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<p>Would the decision normally have been the subject of consultation with service users and the public? If so, explain why this is not practicable and the steps that have or will be taken to communicate the decision</p>	<p>No</p>
<p>Has any adverse impact on groups with protected characteristics been identified and if so, how will these be mitigated?</p>	<p>It is proposed that only the self – administered testing should commence initially. It is acknowledged that some persons with protected characteristics may not therefore be able to benefit from the education based testing regime which may in turn impact adversely on their access to educational provision. The council continues to seek clarification from the Department for Education in relation to the procedures to be employed to administer the testing safely and to identify processes by which all children and staff can benefit from testing. The council is aware that some school leaders have expressed concerns as to how their staff and volunteers are able to administer the tests safely and do not consider they are in a position to commence any other than self- administered testing at present. An equalities impact assessment should be undertaken to ensure that any adverse impact can be fully identified and mitigations put in place.</p>
<p>Background/Reports/Information considered and attached (including Legal, HR, Financial, Equality and other considerations as required))</p>	<p>On 15 December 2020, the Government announced that in order to safeguard the health of the teaching workforce and keep as many staff and pupils in school and college as possible, it would be making rapid-result coronavirus (COVID-19) tests available to schools and colleges at the beginning of 2021.</p> <p>The Government has already commenced the provision of rapid-result testing kits and PPE to secondary schools and FE colleges:</p>

	<ul style="list-style-type: none"> •for the school and college workforce to conduct weekly testing - this will help identify those who are carrying the virus without displaying symptoms, reducing the risk of transmission •for students and pupils as well as the school and college workforce to conduct daily testing for those identified as close contacts of workforce colleagues, students or pupils that have tested positive - this ensures that they do not need to isolate and are able to continue to benefit from high quality, face to face education <p>It is not a mandatory requirement for schools to carry out testing, but secondary schools and colleges are strongly encouraged to participate to reduce the risk of transmission of the virus.</p> <p>A testing handbook has been issued to support the testing programme.</p> <p>Legal considerations</p> <p>The Council’s Constitution provides that “notwithstanding any other provision of the Constitution Strategic Directors shall have the power, after discussion, if practicable, with the Leader of the Council or the relevant Cabinet Member or Chair, to take such actions deemed to be necessary and expedient in matters requiring urgent consideration and which, because of the timescale involved, or the need to safeguard the interests of the County Council, cannot be dealt with by submission to the next following meeting of the Council, Cabinet, Cabinet Member or Committee.”</p> <p>The Improvement and Scrutiny Procedure Rules states:</p>
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	<p>“13(6) The call-in procedure set out above shall not apply where the decision being taken by Cabinet is urgent. A decision will be urgent if any delay likely to be caused by the call-in process would seriously prejudice the Council’s or the public interest. All reports recommending that decisions be taken should say whether or not it is proposed that call-in be waived. The record of the decision, and notice by which it is made public, shall state whether in the opinion of the decision-making person or body, the decision is an urgent one, and therefore not subject to call-in. The Chairman of the appropriate Improvement and Scrutiny Committee should agree both the decision proposed is reasonable in all the circumstances and to it being treated as a matter of urgency. Decisions taken as a matter of urgency should be reported to the next available meeting of the Council, together with the reasons for urgency.”</p> <p>The Council has powers in accordance with S1-6 of the Localism Act 2011 to do that which will be to the ‘benefit of the authority, its area or persons resident or present in its area.’ The proposed benefit of this action is to identify those students identifying as asymptomatic whilst having Covid-19 and to thereby reduce the spread of the infection.</p> <p>An equalities impact assessment should be undertaken in order to identify those persons with protected characteristics who may be impacted by limiting the testing regime to self-administered testing only. This decision should be reviewed in the light of the EIA to ensure that all appropriate mitigations have been considered and implemented.</p> <p>It is important that schools process the data related to this exercise appropriately</p>
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	<p>and undertake their roles as Data Controllers effectively. The DfE have been asked to provide their Data Privacy Impact Assessment and their Legitimate Interest Assessment so that these can be shared with schools to assist in their own assessments relating to data privacy.</p> <p>Schools are also being supported in relation to the effective use of consent forms to ensure that consent is appropriately obtained and that information necessary to support safe testing is available at the point of testing.</p> <p>Financial Considerations</p> <p>The costs associated with the testing of children in school will be met from either Government, through the supply of testing kits, or the school themselves in terms of the administration of the tests. The liability which may fall on the council, rather than schools delegated budgets, is associated with any potential claim against the excess that exists on it's insurance policy. Whilst the excess per claim is £1m it is not considered likely that any liability that may arise would be significant due to the self-administered nature of the testing approved within this report.</p>
<p>Consultation with relevant Cabinet Member (s) – please note this is obligatory.</p>	<p>Discussed and agreed with Councillor Dale on 19 January 2021.</p>
<p>Approval of Chair of appropriate Improvement and Scrutiny Committee where call in is intended to be waived – please note this is obligatory in those circumstances</p>	<p>Councillor Musson, Chair of Improvement and Scrutiny Committee – People has approved the waiver of the call in due to the urgent nature of the decision required.</p>
<p>Decision:</p>	<p>Approved</p>
<p>Signature and Date:</p>	

A handwritten signature in black ink, consisting of several loops and a long horizontal stroke.

21st January 2021

**DERBYSHIRE COUNTY COUNCIL
OFFICER DECISION AND DECISION REVIEW RECORD**

Officer: Jane Parfremment <i>*For emergency powers, this would be the Executive Director</i>		Service: Children's Services
Delegated Power Being Exercised: <i>*The delegation detailed in the Constitution to the specified officer or emergency powers</i>		
Subject of Decision: (i.e. services affected)	Lateral Flow Device (LFD) Testing staff at DCC maintained Primary Schools and maintained nursery schools	
Is this a review of a decision? If so, what was the date of the original decision?	No	
Key decision? If so have Democratic Services been notified?	No	
Decision Taken (specify precise details, including the period over which the decision will be in place and when it will be (further) reviewed):	<p>To provide primary schools and nurseries which are maintained by DCC with authority to proceed with general asymptomatic twice weekly self-administered LFD testing for staff without waiting for the DfE letter of comfort.</p> <p>The testing can start with immediate effect and must be carried out in accordance with DfE guidance, standard operating procedures and mitigation measures set out in the attached risk assessment.</p> <p>To be reviewed in two weeks to review incidents and processes.</p>	
Reasons for the Decision (specify all reasons for taking the decisions including where necessary reference to Council policy and anticipated impact of the decision) Where the decision is subject to statutory guidance please state how this has been taken into consideration.	<p>To identify asymptomatic staff and to require them to self-isolate which in turn will reduce the spread of the virus, protect the most vulnerable and drive down the infection rate across the county area of Derbyshire (excluding Derby City). Pilots have shown how rapid testing can be used effectively and have positive impacts in schools and colleges.</p>	

<p>Alternative Options Considered (if appropriate) and reasons for rejection of other options</p>	<p>Continue to advise the schools to wait for DfE letter of comfort until testing can commence.</p> <p>This could lead to:</p> <ul style="list-style-type: none"> • Internal political reputational damage • schools starting to test anyway without DCC control or guidance • increased spread of COVID within school settings • increased risk of teacher's absence • lessons impacted • Academies seen as on front foot <p>The risk of delaying LFD testing is slightly higher than the risks associated with testing.</p>
<p>Has a risk assessment been conducted ?- if so what are the potential adverse impacts identified and how will these be mitigated?</p>	<p>DCC schools have insurance in place for this activity (self-administered tests), although there is a significant excess which falls to DCC to cover in the event of a claim. The Council needs to balance the risk of claims (financial and reputational) against the risk of not proceeding with the testing (public health and reputational).</p> <p>There is no insurance cover in place for DCC schools in the event of a data protection breach and therefore this poses a further financial risk to the Council.</p> <p>The Council has sought to mitigate these risks completely by seeking a letter of comfort from the Department for Education which replicates the indemnities provided in the letter of comfort received from the Secretary of State for Health when the Council commenced community testing, however this has not been forthcoming. The Council will continue to pursue the Department for Education for the letter of</p>

	<p>comfort. Further enquiries are also being made to establish whether the letter of comfort received from the Secretary of State for Health extends to testing in schools.</p> <p>In the meantime, the Council has balanced the current risk and in consideration of the attached risk assessment has determined that the public health risk of not approving the roll out of self-administered testing for staff in DCC primary schools and early years settings outweighs the financial risk of proceeding with the testing.</p>
<p>Would the decision normally have been the subject of consultation with service users and the public? If so, explain why this is not practicable and the steps that have or will be taken to communicate the decision</p>	<p>No</p>
<p>Has any adverse impact on groups with protected characteristics been identified and if so, how will these be mitigated?</p>	<p>The proposed tests will be made available to all staff.</p>
<p>Background/Reports/Information considered and attached (including Legal, HR, Financial, Equality and other considerations as required))</p>	<p>Legal considerations</p> <p>The Council’s Constitution provides that “notwithstanding any other provision of the Constitution Strategic Directors shall have the power, after discussion, if practicable, with the Leader of the Council or the relevant Cabinet Member or Chair, to take such actions deemed to be necessary and expedient in matters requiring urgent consideration and which, because of the timescale involved, or the need to safeguard the interests of the County Council, cannot</p>

	<p>be dealt with by submission to the next following meeting of the Council, Cabinet, Cabinet Member or Committee.”</p> <p>The Improvement and Scrutiny Procedure Rules states: “13(6) The call-in procedure set out above shall not apply where the decision being taken by Cabinet is urgent. A decision will be urgent if any delay likely to be caused by the call-in process would seriously prejudice the Council’s or the public interest. All reports recommending that decisions be taken should say whether or not it is proposed that call-in be waived. The record of the decision, and notice by which it is made public, shall state whether in the opinion of the decision-making person or body, the decision is an urgent one, and therefore not subject to call-in. The Chairman of the appropriate Improvement and Scrutiny Committee should agree both the decision proposed is reasonable in all the circumstances and to it being treated as a matter of urgency. Decisions taken as a matter of urgency should be reported to the next available meeting of the Council, together with the reasons for urgency.”</p> <p>The Council has powers in accordance with S1-6 of the Localism Act 2011 to do that which will be to the ‘benefit of the authority, its area or persons resident or present in its area.’ The proposed benefit of this action is to identify those pupils identifying as asymptomatic whilst having Covid-19 and to thereby reduce the spread of the infection.</p> <p>It is important that schools process the data related to this exercise appropriately and undertake their roles</p>
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	<p>as Data Controllers effectively. The DfE have been asked to provide their Data Privacy Impact Assessment and their Legitimate Interest Assessment so that these can be shared with schools to assist in their own assessments relating to data privacy.</p> <p>Schools are also being supported in relation to the effective use of consent forms to ensure that consent is appropriately obtained and that information necessary to support safe testing is available at the point of testing.</p> <p>Financial Considerations</p> <p>The costs associated with the testing of children in school will be met from either Government, through the supply of testing kits, or the school themselves in terms of the administration of the tests. The liability which may fall on the council, rather than schools delegated budgets, is associated with any potential claim against the excess that exists on it's insurance policy. Whilst the excess per claim is £1m it is not considered likely that any liability that may arise would be significant due to the self-administered nature of the testing approved within this report.</p>
<p>Consultation with relevant Cabinet Member (s) – please note this is obligatory.</p>	<p>Discussed and agreed with Cllr Dale by Iain Peel, Service Director (Schools & Learning) 27 January 2021</p>
<p>Approval of Chair of appropriate Improvement and Scrutiny Committee where call in is intended to be waived – please note this is obligatory in those circumstances</p>	<p>Discussed and agreed with Cllr Musson by Roy Ackrill (Commissioning, Communities And Policy, Improvement & Scrutiny) – 27 January 2021</p>
<p>Decision:</p>	<p>Approved</p>
<p>Signature and Date:</p>	

A handwritten signature in black ink, appearing to read 'J. Parfremment', enclosed within a rectangular box.

JANE PARFREMENT
28th January 2021