

SEN2 person level 2022

Technical Specification

Version 1.0

February 2021

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Version History

Version number	Update	Author, team and date
0.0	First collation of information into single document	Sean Gibson: DISD; DfE – November 2019
0.1	Review and further drafting.	Alan Brooks; DDU; January 2020
0.2	Review following DDU feedback.	Sean Gibson; DISD; January 2020
0.3	Interim tidy up version	Alan Brooks; DDU; January 2020
0.4	Review and consolidation following draft of validation.	Sean Gibson; DISD; January 2020
0.5	Reordering of section 1.1 and further information on census dates added to 1.2.Further elaboration of scope section (1.3) to include variables and flow diagram showing cases in scope.Section 1.5 added, DfE standard wording on Data PrivacyTwo data items added to XML structure.	Sean Gibson; DISD; March 2020
0.6	Update to reflect move from January 2021 to January 2022 Removal of validation from structure and guidance section Minor typos corrected and alt text added to logical model picture	Sean Gibson; DISD; November 2020

0.7	Ethnicity added to person details Placement details amended to include entry and leaving date and attendance pattern	Sean Gibson; DISD; November 2020
0.8	Paragraph 2.4: Placements – further advice about placement rank added. Person message structure (para 3.2.2): Placement dates tags amended to 'entry date' and 'leaving date' Person message structure (para 3.2.2): <placementdetail> within <plan> amended to <planplacementdetail> Person message structure (para 3.2.2): <placementdetail> (i.e. within <activeplans>) – cardinality amended from 02 to 0n Person message structure (para 3.2.2): <senneed> cardinality amended from 02 to 12 XML structure (paras 3.2.1 and 3.2.2): CBDS new data item and code set references inserted. Person message structure (para 3.2.2): SENunitIndicator> and <resourcedprovisionindicator> tags – close tag inserted.</resourcedprovisionindicator></senneed></activeplans></placementdetail></planplacementdetail></plan></placementdetail>	Alan Brooks; DDU; January 2021

	Section 4: reference to Annex A inserted.	
1.0	Base lined version	Alan Brooks; DDU; February 2021

Assumptions made in creating this specification:

A1	Each local authority will provide a single file containing all data.
A2	The collection will use COLLECT (Collections On-line for Learning, Education, Children and Teachers) as the data collection mechanism
A3	DfE will only accept submissions in XML format

Definitions

EHC: Education, health and care plan, issued by a local authority.

MIS: Within this document the term MIS (management information system) is used in a generic sense as the source system, or systems, where the data are normally maintained and from where they are exported by the local authority. This may be the local authority's SEN or EHC plan electronic case management system.

Person: The child or young person for whom the EHC plan (or request) refers

Voluntary: This refers to the basis on which the entirety of the data is returned to the department by the local authority. All EHC plans should be included in the data return.

1. Introduction

SEN2 collects data about children for whom the local authority has responsibility for the management of the SEN processes, under the 1996 Education Act and the 2014 Children and Families Act. Therefore, where a child or young person are resident in a different local authority to that which holds the EHC plan, then the local authority that holds the EHC plan must return their information on SEN2, rather than the local authority where they are resident.

1.1 Purpose, scope and audience

This specification describes the person level SEN2 data collection. This data collection covers all local authorities in England and provides the only complete source of information on education, health and care plans (EHC plans).

The data collected is expected to cover all active education, health and care plans (EHC plans) as at January 2022, requests and assessments handled by local authorities in the calendar year and current ongoing requests and assessments for EHC plans.

The data consists of person level information for those children and young people in scope and information about their requests for assessment, assessment process and their EHC plan if a decision to issue is reached. A local authority may continue to maintain an EHC plan for a young person until the end of the academic year during which the young person attains the age of 25.

The collection covers those children and young people with an EHC plan only. This collection should not be used to return information on school pupils with SEN support.

This document has been developed to support DfE developers, local authorities and suppliers of local authority management information systems. It should be read in conjunction with:

- Common basic data set (CDBS add link when data items added) a database comprising all levels, all modules, all data items and all code-sets within one spreadsheet. This spreadsheet makes use of filters and hyperlinks to navigate around. The filters make it possible to view extracts of the common basic data set for use in specific collections, including the SEN2 person level 2022 collection. All the items relating to this specification can be found by filtering on the column headed SEN2 2022 of the data definitions worksheet in the next version.
- Local authority guide which may be found here (add link when published)
- Validation rules (Annex A)
- Unique Pupil Number (UPN) Guidance

1.2 Coverage and Timings

This document specifies requirements for the 2022 SEN2 personal level data collection. It does not cover requirements for the statutory 2022 aggregate level collection which will run as normal and for which usual documentation will apply. A dual run of the two collections will occur in 2022. It is expected that the 2022 aggregate collection will be the last instance of this data collection and the person level collection will be mandatory for 2023 and thereafter.

The 2022 person level collection is to be completed on a voluntary basis. Local authorities are requested to return all the specified data attributes for the 2021 calendar year. Key dates are:

- The 2022 collection period will open on 20 January 2022 and the closing date will be the 17 February 2022. Further cleaning of data may occur following the submission date.
- The collection has a 'census date' of the third Thursday in January. Unless otherwise stated, the terms 'census date' and 'census day' in this document refer to 20 January 2022.
- The 'census period' is the calendar year preceding the census date. For the 2022 collection, the census period is from 1 January 2021 to 31 December 2021 inclusive.
- Person level records and data collected within the census period are to be included within the census return for census day.

1.3 Summary of cases to be included

The following cases are expected to be included.

Active EHC plans

• <StartDate> is populated and <CeaseDate> is not populated

Activity in the calendar year

- <ReceivedDate> is in calendar year, or
- <RequestOutcomeDate> is in calendar year, or
- <AssessmentOutcomeDate> is in calendar year, or
- <StartDate> is in calendar year, or
- <CeaseDate> is in calendar year

1.3.1 Active plans

Data should be returned for all EHC plans that are active at census date. Modules 1 to 4 inclusive are expected to be completed.

1.3.2 Recently ceased plans

Data should be returned for all EHC plans that have ceased in the calendar year. Modules 1 to 5 are expected to be completed.

1.3.3 Work completed in calendar year, decision not to issue following assessment

Data should be returned for all assessments where a decision not to issue a plan has been reached. Modules 1 and 2 are expected be completed.

Note: Completed assessments where a plan was issued are expected to be returned in active plans or ceased plans.

1.3.4 Work completed in calendar year, decision not to assess

Data should be returned for all requests to assess where a decision to not assess was reached during the calendar year. Module 1 and module 2 are expected to be completed.

1.3.5 Ongoing work – issuing stage

Data should be returned for all assessments where a decision to issue a plan has been reached but the plan has not yet been finalised. Modules 1 and 2 are expected to be complete.

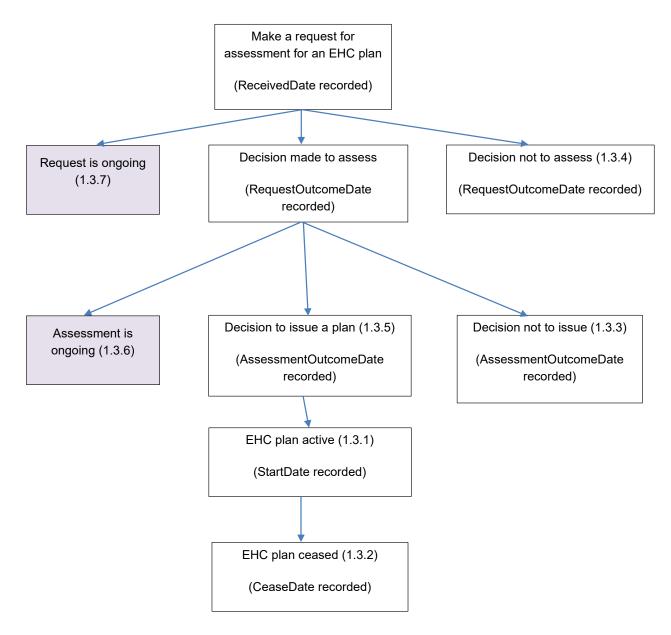
1.3.6 Ongoing work – assessment stage

Data should be returned for all ongoing assessments at the end of the calendar year, i.e. following a decision to assess. Modules 1 and 2 are expected to be complete.

1.3.7 Ongoing work – request stage

Data should be returned for all ongoing requests to assess that have yet to reach a decision to assess at the end of the calendar year. Module 1 is expected to be complete. Data item 2.2 is expected to be complete as a minimum from module 2.

Logical Model



1.4 Data standards

It is the long-term strategy of the department to adopt the e-GIF standards to support the transfer of data across other public sector bodies and government departments. This specification has been developed with those standards in mind; where deviations occur explanation notes have been provided.

1.5 Data privacy

The General Data Protection Regulation (GDPR) and the Data Protection Act 2018 (DPA 2018) provide certain safeguards regarding the use of personal data by organisations, including:

- the department
- local authorities
- schools

The GDPR and DPA 2018 detail the rights of those (known as) data subjects about whom data is held, such as:

- pupils
- parents
- teachers

This includes (amongst other information that we are obliged to provide):

- the right to know the types of data being held
- why it is being held, and
- to whom it may be communicated

For the purposes of data protection legislation, the terms 'process', 'processed' or 'processing' apply to any activity involving the personal data, such as:

- collecting
- storing
- sharing
- destroying
- etcetera please note: this list is not exhaustive

The department provides suggested wording for <u>privacy notices</u> that schools and local authorities may wish to use. However, where the suggested wording is used, the school / local authority **must review and amend** the wording to reflect local business needs and circumstances. This is especially important, as data will be processed that is not solely for use within data collections. As such, to comply with GDPR and DPA 2018, the privacy

notice should contain details of all uses of data within the school / local authority, which may include, for example, information used locally for pupil achievement tracking and (where relevant) the use of CCTV data.

The privacy notice should also include <u>this link</u> to the gov.uk webpage, which provides information on how the department processes data.

2 Structure and guidance

Each local authority is asked to provide information for each of the following modules. The information requested will replace the data requested in the aggregate level return for EHC plans with additional data items necessary to form a person level collection.

The collection consists of six modules: Person details, requests for assessment, EHC assessments, current position, ceased plans and LA details (local authority).

Data recorded in modules 2 to 5 must correspond to a single person recorded in module 1 (Person details).

2.1 Module 1: Person details

Module description: Information required in order to identify the person and to provide basic demographic information. Standard identifiers are also included to enable further matching to data collections and the national pupil database (NPD).

Module composition: Includes identifiers and demographic information including postcode, date of birth, ethnicity (based on CBDS N00177) and gender. UPN (unique pupil number) and UKPRN (United Kingdom provider reference number) should be provided where possible.

Where the child is under 6 years old the UPN is not required (but should be provided if available). However children of compulsory school age are expected to have a UPN. Young people above school age may not have a known UPN if they have never attended a maintained school or further education setting in England.

UPN unknown is optional but allows local authorities to include a reason for a missing UPN within the return preventing queries after the data has been submitted. This specification includes validation that will raise a query for every instance of both a missing UPN and UKPRN for a child or young person aged over 5 years old unless a UPN unknown reason is provided. Those local authorities not returning UPN unknown reason should provide a return level note to explain why UPNs are missing.

Cases to include:

This module should be completed for each person for which an initial request for an EHC needs assessment is made, or an assessment is made, or for which an EHC plan is held. The same person should not be included more than once in this section. Revisions to this section may be required when the persons details change.

2.2 Module 2: Requests for EHC needs assessment

Module description: This module should be completed for all initial requests for assessment for an EHC plan, regardless of outcome, including requests which do not proceed to the assessment stage.

This allows the department to continue to monitor the number of new initial requests for assessment received by local authorities, as in the aggregate level collection. Repeated requests for assessment corresponding to the same person should be recorded separately.

Module composition: This module contains information for all the initial requests for assessment that are completed in the collection year or are ongoing at the end of the collection year.

The date of the request should be recorded, which will count as day one in relation to the 20 week limit for assessment. The outcome of the request should be recorded. This includes an option to specify that an outcome has not been reached at the end of the collection year.

The date that the requestor was informed of the outcome of the decision to assess should be recorded for all cases. An error will be recorded whenever a date is recorded without an outcome, or where an outcome is recorded without a date.

The use of mediation and tribunal should also be recorded in relation to the decision to assess. Where mediation does not occur prior to tribunal, mediation should be recorded as occurring as it is assumed mediation was offered but was declined. A query will be raised where tribunal occurs without mediation. A comment should be provided at return level if mediation is recorded as not occurring and a tribunal subsequently occurred.

If the request for assessment was made while in relevant youth accommodation, this should also be recorded. Relevant youth accommodation corresponds to a young offender institution, a secure training centre or a secure children's home.

Cases to include: A person can make multiple requests for assessment in the year. This should include requests for assessment where the decision to assess has yet to be reached by the end of the collection year. A validation is included to flag an error where multiple open requests are specified for the same person.

If the initial request for assessment is refused, no information relating to that request is required in subsequent modules.

Once a decision to assess has been reached, data in this section is not expected to be subject to revision by the local authority.

2.3 Module 3: EHC needs assessments

Module Description: This module should be completed for all cases where an initial request for assessment is agreed, regardless of assessment outcome, including those where a decision is made to not issue a plan.

This allows the department to continue to monitor the number of assessments carried out by local authorities. Repeated assessments corresponding to the same person should be recorded separately.

Module composition: This module contains information for all assessments that are completed in the collection year or are ongoing at the end of the collection year.

This section collects information on the decision to issue a plan, including the date at which a plan was issued or the date at which the person was notified of decision not to issue a plan.

When an assessment transfers to another local authority before the assessment is completed, this can be recorded and no further information is required in this module.

If a 20 week exception applies to the assessment, this should be recorded. The reason for the exception is not required. Annex D of the collection guide provides further details on the exceptions applicable.

The establishment named on the plan should be recorded. This should be the URN of the establishment if available, the UKPRN if available or an 'other' category. Where Other is recorded, a query will be raised for further information.

A secondary establishment type can be recorded. Only two options are available. In the event that more than two establishments are named on the plan, the two that are attended most in a typical week or term should be recorded.

Where a person's placement is for the purposes of attending a SEN Unit or resourced provision, this should be specified. A SEN (special educational needs) unit or resourced provision must be approved by the local authority. For further details see Annex B of the collection guide

Where a person's placement is in a residential setting, please record whether this is for 38 to 51 weeks or 52 weeks. Shorter durations need not be recorded.

If the plan specifies participation in work based learning activity then this must be recorded. It is expected that work based learning will be in conjunction with an education setting. This should therefore also be recorded in the establishment type.

Information on take up of personal budgets must be recorded, including whether organised arrangements are in place and the use of any direct payments (education, health, social care, combination).

The use of mediation and tribunal must also be recorded. This should be recorded specifically in relation to the decision to issue a plan. Where mediation occurs for another reason, this should also be recorded. Where mediation does not occur prior to tribunal, mediation must be recorded as occurring as it is assumed mediation was offered but was declined. A query will be raised where a tribunal occurs without mediation. A comment should be provided at return level if mediation is recorded as not occurring and tribunal subsequently occurred.

Cases to include: A person may have multiple assessments and multiple decisions to issue an EHC plan within a collection year. All assessments should be recorded separately. A validation is in place to flag an error when multiple assessments are recorded for a single person where no decision has been reached.

Each assessment is expected to have details of the initial request recorded in module 2, except where the decision to assess was made by another local authority.

This section is expected to be completed once only for each request for assessment that is agreed. Once completed, data in this section is not expected to be subject to revision by the local authority unless changes are made to the detail of the EHC plan, for example, a change to the establishment named on the plan at annual review.

Where a decision is reached to not issue a plan, the decision outcome, date and information on mediation and tribunal are required only. No further information is required in subsequent modules.

2.4 Module 4: Placements

Module description: This module must be completed for all active EHC plans on the collection day. This module should be completed for all placements in the census period for each person each year. This information will be used to produce the caseload as at the collection date and subsequent breakdowns of this. This module records details of the current placements of the individual, including start date, and any other placements the individual may have had during the collection period.

Module composition: If the active EHC plan has been imported from another local authority, the 3 digit code (based on CBDS N00216) of the exporting local authority must be provided.

The establishment currently attended must be recorded. Where a secondary establishment is also attended, this must be recorded also. There are options to record 'education elsewhere' or where the child or young person is not currently in education, which must be reported if applicable. A start date for the placement is required. The attendance pattern (full or part time) should also be recorded.

A secondary establishment type must be recorded where applicable. Only two options are available. In the event that more than two establishments are named on the plan, the

two that are attended most in a typical week or term should be recorded. Up to two placements may be recorded for each person. If more than two placements are used then please record the two that are typically attended most in an average week or term as applicable.

Placement rank must be recorded as follows: 1 – Primary placement; 2 – Secondary placement.

Any further placements in the collection period should also be recorded. It is not expected that multiple open placements with the same rank will overlap.

For current placements, where a person is attending a SEN Unit or resourced provision associated to one of the establishments specified, this should also be recorded. A SEN unit or resourced provision must be approved by the local authority. For further details see Annex B of the collection guide.

Where a person is in a residential setting, please record whether this is for 38 to 51 weeks or 52 weeks. Shorter durations need not be recorded.

If the young person is participating in work based learning activity then this must be recorded. It is expected that work based learning will be in conjunction with an education setting. This must therefore also be recorded in the establishment type.

The primary and, if applicable, secondary type of need identified must be returned. Where multiple types of need are identified, this should be the types of need ranked 1 and 2. The types of need are consistent with the types of need specified in the CBDS.

The latest date that the person was informed of the outcome of an annual review must also be recorded. If a review has taken place but the person has yet to be informed of the outcome, previous review date where the outcome was known must be recorded. If a review has not occurred since the plan was made, no data should be returned.

Cases to include: This module must be completed for all persons with an active EHC plan. This includes all plans where a decision to issue a plan was made, with a plan start date and no plan cease date. Plans where a notice to cease has been issued, but the time available for bringing an appeal has yet to expire must be included. Where an appeal has been lodged but has yet to reach an outcome, the plans must be included.

2.5 Module 5: Ceased plans

Module Description: This module collects information on when and why an EHC plan has ceased. Reasons are provided for selection.

Module Composition: This module should be completed for any EHC plans that have ceased. The date that the plan ceased and reason for cessation are to be recorded.

Local authorities must continue to maintain the EHC plan until the time has passed for bringing an appeal or, when an appeal has been registered, until it has been concluded. The date should reflect this appeal period and not correspond to the date a decision to cease was reached.

For those young people reaching age 25, it is expected that the plan will cease in July following their 25th birthday. A query will be raised at a record level where any plans are still active beyond July following the young persons 25th birthday.

Where the reason for cessation is recorded as 'other', a query will be raised to request more information.

Cases to include: This module is expected to be completed once per active EHC plan only, when the plan has ceased or transferred to another local authority during the census year.

Once completed, this section is not expected to be subject to revision by the local authority. If a new EHC plan is requested subsequently for the same person, this should be recorded as a new request for assessment.

2.6 Module 6: LA details

Module Description: This module contains further information at the local authority level that is to be collected.

Module Composition: The module contains two questions about whether the local authority has a designated medical officer (DMO) or a designated clinical officer.

Data is not returned at a person level, but rather within the XML message header.

3 Local authority data returns

3.1 Data return formats

A person level SEN2 submission from a local authority should be provided in an XML file structure as defined below.

3.2 XML schema

An XML submission will be a single message consisting of

- A header
- A series of repeated nodes containing data on one or more children or young people with a request for an EHC plan.

NB: XML tags and CBDS references are draft until base line version.

3.2.1 Header details

A standard XML message header is required for each return . The data items should be populated according to the guidance in Section 2. This includes the data items for module 6, designated clinical officer (DCO) and designated medical officer (DMO).

CDBS reference	
-	<header></header>
-	<collectiondetails></collectiondetails>
N00600	<collection>SEN2</collection>
N00602	<year>2020</year>
N00603	<referencedate>2020-02-01</referencedate>
-	
-	<source/>
N00604	<sourcelevel>L</sourcelevel>
N00216	<lea>999</lea>
N00605	<softwarecode>Supplier Reference</softwarecode>
N00607	<release>1.4 2019-06-06</release>
N00606	<serialno>001</serialno>
N00609	<datetime>2020-02-01 11:10:51</datetime>
N00692	<dmo>Y</dmo>
N00693	<dco>Y</dco>
-	
-	

The layout is as follows:

3.2.2 Person XML message structure

CDBS		Cardinality (Note: item level
reference		elements occur only once unless
		otherwise stated)
-	<persons></persons>	Each <message> group contains</message>
		one and only one <persons></persons>
		group
-	<person></person>	Record returned for all persons for which the local authority has been responsible for a request for assessment, assessment or an active EHC plan in the collection year
N00003	<pre><surname>FamilyName</surname></pre>	
N00004	<pre></pre>	
N00066	<personbirthdate>2000-01-01</personbirthdate>	
N00065	<gendercurrent>2</gendercurrent>	
N00177	<ethnicity></ethnicity>	
N00037	<postcode>AA11AA</postcode>	
N00001	<upn>X1234567898765</upn>	
N00011	<uniquelearnernumber>1234567890</uniquelearnernumber>	
N00135	<upnunknown></upnunknown>	Where <upn> or</upn>
		<uniquelearnernumber> are</uniquelearnernumber>
		present, <upnunknown> is not</upnunknown>
		required

-	<request></request>	Each <person> group contains</person>
		0n <request> groups</request>
N00694	<receiveddate></receiveddate>	
N00695	<rya></rya>	
N00696	<requestoutcomedate></requestoutcomedate>	
N00697	<requestoutcome></requestoutcome>	
N00698	<requestmediation></requestmediation>	
N00699	<requesttribunal></requesttribunal>	
N00700	<exported></exported>	Code set CS003
-	<assessment></assessment>	Each <request> group contains</request>
		01 <assessment> groups</assessment>
N00701	<assessmentoutcome></assessmentoutcome>	Code set CS109
N00702	<assessmentoutcomedate></assessmentoutcomedate>	
N00703	<assessmentmediation></assessmentmediation>	
N00704	<assessmenttribunal></assessmenttribunal>	
N00705	<othermediation></othermediation>	
N00706	<othertribunal></othertribunal>	
N00707	<week20></week20>	
-	<plan></plan>	Each <assessment> group</assessment>
		contains 01 <plan> groups</plan>
N00028	<startdate></startdate>	
-	<planplacementdetail></planplacementdetail>	Each <plan> group contains 02</plan>
		<placementdetail> groups</placementdetail>
N00278	<urn></urn>	
N00530	<ukprn></ukprn>	Where <urn> is present,</urn>
		<ukprn> is not required</ukprn>

N00708	<sensetting></sensetting>	Where <urn> or <ukprn> are</ukprn></urn>
		present, <sensetting> is not</sensetting>
		required
		Code set CS110
N00709	<placementrank></placementrank>	
-		
N00022	<senunitindicator></senunitindicator>	
N00023		
	<resourcedprovisionindicator></resourcedprovisionindicator>	
N00710	<planres></planres>	
N00711	<planwbp></planwbp>	Code set CS111
N00712	<pb></pb>	
N00713	<oa></oa>	
N00714	<dp></dp>	Code set CS112
N00715	<ceasedate></ceasedate>	
N00716	<ceasereason></ceasereason>	Code set CS113
-		
-		
-	<activeplans></activeplans>	Each <request> group contains</request>
		01 <activeplans> groups</activeplans>
N00717	<transferla></transferla>	Code set CS303
-	<placementdetail></placementdetail>	Each <activeplans> group</activeplans>
		contains 0n <placementdetail></placementdetail>
		groups
N00278	<urn></urn>	
N00530	<ukprn></ukprn>	Where <urn> is present,</urn>
		<ukprn> is not required</ukprn>

N00708	<sensetting></sensetting>	Where <urn> or <ukprn> are</ukprn></urn>
		present, <sensetting> is not</sensetting>
		required
N00709	<placementrank></placementrank>	
N00018	<entrydate></entrydate>	
N00019	<leavingdate></leavingdate>	
N00721	<a>AttendancePattern>	
-		
N00022	<senunitindicator></senunitindicator>	
N00023		
	<resourcedprovisionindicator></resourcedprovisionindicator>	
N00718	<res></res>	
N00719	<wbp></wbp>	Code set CS111
-	<senneed></senneed>	Each <activeplans> group</activeplans>
		contains 12 <senneed> groups</senneed>
N00166	<sentype></sentype>	
N00024	<sentyperank></sentyperank>	
-		
N00720	<lastreview></lastreview>	
-		
-		
-		
-		

3.3 Special notes for XML returns

The standard XML entity references should be used for the following special characters:

Character	Entity reference
Ampersand (&)	&
Left Angle Bracket (<)	<
Right Angle Bracket (>)	>
Single Quote/Apostrophe (')	'
Double Quotes (")	"

For special characters such as é use a character reference such as é. This produces a generic XML file which can be viewed as such in a suitable browser. Details of all such characters are found within the XML standard documentation; see for example Extensible markup language (XML) 1.0 (fifth edition) section 2.

There is no naming convention for the XML file; however we recommend that the name should be meaningful to a user attempting to locate the file. Spaces in the file name are not a problem. The file extension should be .xml.

3.4 Re-submission guidance

When re-submissions are required the serial number in the header must be incremented by the provider's software. We have also assumed that the whole file will be re-submitted. Note that a re-submission will delete and replace all the data contained in the previous submission.

4. Validation checks

An Excel workbook (Annex A) specifies validation rules that are applied to the data by DfE using the COLLECT system. They should also be applied, as far as possible, by local authorities prior to loading the data onto the COLLECT system and any issues resolved.

Those data items included in the tables but not appearing in the validation rules - that is, those not shown in the validation rules as "must be present" - should be supplied where relevant (such as: SEN unit indicator).

The workbook also shows which validations are 'errors' and which ones are 'queries':

- an 'error' is a failed validation check that must be corrected before the return is submitted. There may be rare scenarios where a few 'errors' can be incorrectly triggered. The department will assess these scenarios on a case by case basis and, where appropriate, allow the 'error' to be 'OKable' in COLLECT
- a 'query' is one which must be investigated, and potentially corrected, as it identifies data that would usually be invalid. 'Queries' may be accepted with appropriate notepad entries. The department will accept notes at return level only.



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