

JSP 820 Tri-Service Disability and Additional Needs Policy

Part 2: Guidance

## **Foreword**

This Part 2 JSP provides guidance in accordance with the policy set out in Part 1 of this JSP; the guidance is sponsored by the Defence Authority for Personnel. It provides policy-compliant business practices which should be considered best practice in the absence of any contradicting instruction. However, nothing in this document should discourage the application of sheer common sense.

## **Preface**

### How to use this JSP

- 1. JSP 820 is intended as a practical handbook on the application of policy in support of those Service Personnel and their families who may have a disability or additional need. It is designed to be used by staff responsible for the delivery of that support. This JSP contains the policy and direction on disability and additional needs welfare support and guidance on the processes involved and best practice to apply
- 2. The JSP is structured in two parts:
  - Part 1 Directive, which provides direction that must be followed, in accordance with Statute or Policy mandated by Defence, or on Defence by Central Government.
  - b. Part 2 Guidance, which provides the guidance and best practice that will assist the user to comply with the Directive(s) detailed in Part 1.

### **Further Advice and Feedback - Contacts**

3. The owner of this JSP is Pers Trg-SVW-Welfare. For further information on any aspect of this guide, or questions not answered within the subsequent sections, or to provide feedback on the content, contact:

Job Title/E-mail	Project focus	Phone
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## 1 – MOD SUPPORT

### **Accommodation**

- 1. It is essential that the relevant housing authority (in the UK for families' accommodation this is DIO) is made aware of the full details of disabilities, and facilities required, when applications are submitted<sup>1</sup> for accommodation. The Housing Allocation Service Centre (HASC) Housing Manager will take responsibility for managing any adaptations necessary to Service Families Accommodation. The MOD takes a sympathetic approach to the provision of suitably adapted accommodation and each case will be considered on its merits.
- 2. Once suitable accommodation has been allocated, any necessary modifications will be carried out by, and at the expense of, the relevant housing authorities. The modifications will be based on the requirements identified in Occupational Therapist reports produced by LA Community Care Officers or Social Services advisers where available, or the equivalent MOD staff overseas, but must be supported by authoritative evidence. Adaptations to houses can take some time to agree and complete therefore, in accordance with JSP 464, Part 1, Annex C to Chapter 7, personnel are to inform housing authorities of any requirement for adaptations as soon as possible. When possible, modified SFA/SLA should be retained in the adapted form for preferential allocation in the future.

<sup>1</sup> Guidance in JSP464 Tri-Service Accommodation Regulations (TSARs) Part 1, Chapter 7, Section III for UK, and Part 2, Chapter 6, Section III for NI and Overseas.

## 2 - EDUCATION

### **Service Personnel**

1. Support of Service personnel with Specific Learning Difficulties (SpLD). Provisions for those personnel in the Armed Forces identified as having SpLD needs can be found in JSP 898, Part 4, Chapter 6. This promotes and provides details of the systematic support available to those personnel in the Armed Forces with identified SpLD needs in order to maximise their learning potential and training. Opportunities for SpLD screening and subsequent assessment are available to all within the Armed Forces and delivered by appropriately trained and qualified staff.

### Service Children

2. A new JSP (342) is due for release shortly to provide policy on the education of Service children. Much of the following guidance will be subsumed by JSP 342 once it is published.

### Children with Special and Additional Educational Needs (SAEN)

3. The legislation and guidance, in all four administrations in Great Britain and Northern Ireland, specifically in relation to the education of children and young people with SAEN, is constructed mainly with a static population in mind. Children with SAEN from mobile Service families can be disadvantaged if their enforced mobility leads to their needs not being adequately identified and met and/or to continual changes to the provision made available to them in different locations. In some cases, such children's SAEN can be exacerbated or increased by mobility.

### Children's Education Advisory Service (CEAS)

- 4. The Children's Education Advisory Service (CEAS), part of the Directorate for Children and Young People (DCYP), was established to provide information, advice and support for Service families about anything to do with their children's education. A core part of CEAS's work relates to the difficulties often experienced by Service parents in securing what they consider to be adequate and appropriate educational provision for their children with Special and Additional Educational Needs (SAEN). CEAS's contact details can be found in Annex A to Chapter 1.
- 5. CEAS offers a registration service for Service parents who have children with SAEN to allow parents to regularly provide all relevant information about their child so that when advice, information or support is required, it can be made available on an informed basis. CEAS is unable to assist such parents if they do not register their children. Registration of children with SAEN and the on-going provision of all relevant and up to date information should enable CEAS to assist parents in the most appropriate way.
- 6. For Army parents who have children with SAEN, it is mandatory in all circumstances to register SAEN children with both the Chain of Command and CEAS. Parents who serve in the other Services, and have children with SAEN, are strongly

encouraged to register their children, particularly if they are offered an overseas assignment.

- 7. When Service children with SAEN are registered with CEAS, the serving parent's assignment authority is notified so that before offering or confirming a new assignment, CEAS is consulted about potential issues around the education of the child in the proposed new location. Additionally, commanding officers and OC PSFs are notified when children from Army and RAF families respectively, are registered. Such steps are intended to prevent Service children with SAEN and their families from being placed in locations where it is unlikely that their needs would be met appropriately and/or in a timely fashion.
- 8. Whilst some Service families may wish to register a child if they are concerned that s/he may have SAEN, registration is usually for children whose needs have been formally identified by schools and, if appropriate other statutory agencies, and for whom specific strategies, if not resources, have been deployed over a reviewable period (e.g. School Action Plus in England).

### **Continuity of Education Allowance (CEA)**

- 9. Service parents wishing to apply for Continuity of Education Allowance (CEA) must first approach CEAS for advice, In accordance with the regulations set out in JSP 752, Chapter 9, Section 1. The aim of Continuity of Education Allowances (CEA) is to assist Service personnel to achieve continuity of education for their child(ren) that would otherwise be denied in the maintained day school sector if their child(ren) accompanied them on frequent assignments both at home and overseas
- 10. An additional allowance for those already claiming CEA, to assist with the cost of additional SAEN assistance is available in accordance with JSP 752 Chapter 9, Section 3. An appropriate educational psychologists report confirming the child's SAEN and the need for the school to provide additional support is required, and any initial enquires about CEA and SAEN must be made to CEAS.
- 11. Parents who are serving overseas who have SAEN registered children in boarding school are entitled to one extra half-term funded flight per year, in addition to the three main holiday flights<sup>2</sup>. CEAS will co-ordinate escorts to accompany children with additional needs if they travel to or from overseas on school holidays. SSAFA provides a Family Escort Service to help families and their dependants, including those with additional needs, with travel to, from and within the UK. All children must be accompanied by an adult. Needs should be discussed with the SSAFA Family Escort Service Co-ordinator. Contact details of the SSAFA Family Escort Service Co-ordinator can be found at Annex A.
- 12. Service personnel who have children with SAEN at special boarding schools paid for by LA funding are not prevented from being posted elsewhere in the UK or overseas. When a child is placed in such a school by a Local Authority (LA), funding will usually be continued by the new authority into whose area the Service parent is posted. CEAS will advise and assist in this process.
- 13. When a child is placed in such a school by an LA and the parent is posted overseas the LA which made the SEN statement may maintain it but is not required to by

<sup>2</sup> JSP 800 Defence Movements and Transportation Regulations Volume 2 Chapter 9.

law. Joint funding with CEA may be an option on which CEAS can advise and negotiate but it is imperative that as much notice as possible is given. In law, the responsible LA is the one in which the boarding school is located whilst the parent is overseas.

### Service Children's Education (SCE)

- 14. SCE is a tri-Service agency responsible for the education of children of Service families in a number of overseas locations. SCE supports inclusion and makes provision for children with a wide range of SAEN, however, SCE does not have any special schools, special units or pupil referral units, and cannot make provision for the complete range of special and/or additional needs. This is particularly so for children with severe, profound and complex needs that require specialist provision that is not available within SCE.
- 15. SCE procedures in relation to SAEN work in conjunction with those that apply in England. This ensures smooth transition for children arriving with already identified SAEN and enables direct access to SCE support systems. SCE also ensures that documentation is available at transfer to the new Local Authority (LA) when a child returns from overseas, providing the best opportunity for a seamless transition into the child's new school. All SCE schools have a delegated budget to support children with SAEN, including those with statements. HQ SCE retains a small budget for very exceptional cases.
- Schools are supported in meeting children's SAEN by a team of Inclusion Support Teachers, Senior Educational Psychologists and Senior Education Social Workers who are based in SCE Pupil and Family Services Centres located in Germany and Cyprus.

### Admission of Children with SAEN to SCE schools

- 17. Service parents seeking placements for their children in SCE schools and have Statements of SEN, Co-ordinated Support Plans, or who are placed at School Action plus or equivalent are required to register any of these children with CEAS. Other children may be registered if in discussion with CEAS or on the advice of a teacher, psychologist or education officer it would be advisable to do so. Registering allows early notification of proposed assignments to Local Authorities (LAs) and schools, including SCE, in order that preparatory work can be done to ensure provision is available for the child in the new area.
- 18. It is essential that parents of registered children provide CEAS with the most up to date information available on their child, so that decisions are not based on out of date information. Decisions on supportability are made by local commands, in consultation with SCE, health and social care services. Parents are notified of decisions by J1 in Germany, or for Cyprus and Rest of World schools through the Chain of Command. Once a decision has been made, the family is supported by the Chain of Command and/or CEAS, either in pursuing their posting or if the child's SAEN cannot be met in considering the alternatives.
- 19. When a Service person with a registered child with SAEN is offered a posting in a SCE location, all available reports regarding the child's needs are collated by CEAS and forwarded to HQ SCE to enable a decision about whether or not the child's special and additional needs as described can be met in a SCE school and, if relevant, by the health and social care provision available in the proposed location. An outline of the SEN Enquiry Process can be found at Annex B to this chapter.
- 20. If a child is not already registered with CEAS and the Service person wishes to pursue an overseas assignment, their child's SAEN must be declared at the time when the

assignment is offered. If the SAEN is not declared, it may be necessary to return the family to the U.K., or to reach agreement with the relevant military unit for the Service family to be assigned to an area where it is known that appropriate provision exists. Therefore, it is vital that parents declare any SAEN their children may have prior to accepting assignments and act promptly on the advice they receive.

21. Where, following consultation, it is decided that a child cannot be admitted to an SCE school, parents have the right to request an internal review of the decision. UK education law does not permit parents seeking places for their children or who have secured places for them in overseas schools to bring a case to any independent tribunal. Details of the SCE special needs admission review procedure can be found at Annex A to this chapter.

### Isolated Detachments (ISODETS) and Extra-command areas

- 22. Each Service family with dependant children who have been offered an assignment to an ISODET or an extra-command area has difficult decisions to make regarding the continuing education of their children. Given the diverse locations to which some Service personnel are assigned, SCE provision is not always available and the nature of educational provision available will vary enormously.
- 23. State-maintained, independent and international schools in overseas locations are not bound by U.K. laws in respect of meeting the needs of children with SAEN and, whilst Service personnel assigned to ISODETS or extra-command areas may be able to claim some allowances to enable their children to avoid educational disadvantage, MOD is limited in respect of what it can provide. Service parents with children requiring educational provision who are offered such assignments must seek advice from CEAS before accepting them, particularly if any of their children have identified SAEN.
- 24. Admissions arrangements to schools in Isolated Detachments (ISODETS) and Extra-Command Areas (ECA). Admission arrangements to schools in ISODETS and ECAs are determined locally however, if a child has SAEN, it is essential to provide a prospective school with all known information about him/her. The school will need to decide if it is able to make appropriate additional support provisions for the child. Authority to claim MOD allowances with respect to education overseas, may be sought in accordance with JSP 752, Chapter 9, Sections 8 and 9.

## 3 - MEDICAL

### **Equipment**

- 1. In the UK, special medical equipment for Service dependants should be supplied by the local health authorities. Overseas it is the responsibility of the Service medical authorities to ensure the provision of mobility and other aids to Service personnel and their dependants with additional needs and disabilities.
- 2. Authority for the purchase of mobility or other aids, when supported by the clinician concerned, will normally be granted where it can be confirmed that the NHS or LA would have provided them if the person concerned was in the UK.

## 4 - SOCIAL SERVICES

### **Overseas Commands**

1. Overseas Commands maintain different levels of expertise appropriate to the size of the Command. In all cases J1/N1/G1/A1 staff should be consulted in the first instance. However, Service families may find it useful to refer to the "Disability and Additional Needs - a guide for parents and carers", produced by the Forces Additional Needs and Disability Forum (FANDF), for up to date information. Copies can be obtained through SSAFA.

### **British Forces Germany (BFG)**

2. In BFG, there is an Additional Needs and Disability Co-ordinator (AN+DC) working with the British Forces Social Work Service (BFSWS). The AN+DC is contracted to work with children, young people and adults with disabilities and/or additional needs and can provide community care assessments. BFSWS holds the statutory register for children with a disability, however registration is voluntary. Movement of children who are on the disability register will be referred to the receiving LA with the permission of the parent, and/or guardian where appropriate. SCE maintains a register of children with statements of SEN. Movement of these children will be notified to the receiving LA by SCE.

### **Joint Forces Command (JFC)**

- 3. JFC currently holds responsibility for 3 areas in which a bespoke Social Work Service operates: Cyprus, Gibraltar and the British Forces South Atlantic Islands (BFSAI) (incorporating Ascension Island and The Falkland Islands).
  - a. Cyprus. Within the Sovereign Base Areas (SBAs), SSAFA provides the local authority social work service and has statutory obligations and authority where Additional Needs supportability is concerned. SSAFA Social Work operates in partnership with other the Command Headquarters, public organisations, the voluntary sector, members of the Services and their families, and the wider MoD community in Cyprus.
  - b. Gibraltar. The Joint Social Work Service (JSWS) provides a quasistatutory and non-statutory social work service in Gibraltar. The constituent social work organisations, SSAFA and NPFS/RMW share the lead on providing personal welfare and support. Specifically, the social workers are able to offer advice and support in relation to Disability and Additional Needs.
  - c. BFSAI. SSAFA provides the local authority social work service through a designated social worker, located in the Falkland Islands, and has statutory obligations and authority in respect of supporting welfare and Additional Needs. SSAFA Social Work operates in partnership with the wider community and governments in BFSAI

## 5 - SINGLE SERVICE SUPPORT

1. When Service personnel require assistance they can seek advice from their local unit/station administration or welfare staff. Unit administrative/welfare staff should seek guidance from formation, Garrison or Overseas Commands and/or single Service welfare staff for further advice:

	Policy Advice	Welfare
Royal Navy and Royal	Navy Command,	Naval Personal and
Marines	Personal, Families and	Family Support Royal
	Community Support	Marines Welfare
		(NPFS/RMW)
Army	Army HQ, PS4(A)	Army Welfare Service
RAF	HQ Air Community	SSAFA (RAF)
	Support	

## 6 - ADDITIONAL SOURCES OF SUPPORT

### **MOD Advisor**

1. An MOD Additional Needs and Disability Advisor (ANDA) is partially funded by the MOD<sup>3</sup> and established at SSAFA HQ in London. The ANDA is a fully qualified and experienced additional needs advisor who provides a focal point of contact for all Service families with disabilities and additional needs. The advisor is on hand to advise on MOD or single Service policy or casework staffs on matters relating to disability or additional needs. Contact details for the ANDA can be found in Annex C.

### Forces Additional Needs and Disability Forum (FANDF)

2. This group is a non-publicly funded body which is supported by SSAFA, to keep Service families with disabilities and additional needs in touch with issues that affect them both inside and outside Service life. It is directed by a Member's Forum, whose membership is made up of Service parents of children and/or adults who have a disability or additional need. The Forum is facilitated by the ANDA and further information can be found in DIN 2008DIN01-037.

### **Charitable Assistance**

3. SSAFA professional and voluntary staff provide assistance and advice to families with disabilities and/or additional needs and should be involved wherever possible. Army Families Federation also provide a special needs advisor. These organisations, single Service welfare organisations and HIVE can signpost to a range of other charitable organisations that may be able to offer advice and practical or financial assistance. Contact details for all these supporting staff and organisations can be found in Annex C.

## **Transitional Welfare Support**

4. In some instances, Service personnel or dependents of Service personnel may have an enduring additional need which will continue beyond discharge from Service. In-Service, additional needs and disability are supported by the single Service Specialist Welfare Providers (SSWP), however post Service this provision transfers to Local Authorities. In order to support the transition of welfare provision, a <a href="Irransitional Welfare Requirements Protocol">Irransitional Welfare Requirements Protocol</a> between the SSWP and the Veterans Welfare Service (VWS). Referrals between SSWP and VWS should be made at the earliest opportunity (i.e. 8 weeks prior to discharge), and with consent from the Service person. Referrals can be made for any type of discharge including Administrative, Medical or on normal discharge.

### **Financial Benefits and Assistance**

5. A full list of Department for Work and Pensions (DWP) benefits for eligible UK citizens or those with recourse to public funds are available on the <a href="DWP website">DWP website</a>, by contacting local Jobcentre Plus offices (contacts found in local UK telephone directories) and from SSAFA.

<sup>3</sup> The ANDA post is funded by the MOD on a tri-service basis.

## Service Charity/Regimental/Corps Benevolence

6.	Service Charity, Regimental or Corps Benevolence may be able to provide
additiona	I financial assistance where a need is identified. Units will be in a position to give
appropria	te contact information for such organisations; individuals are advised to contact
welfare o	r administrative staff.

# ANNEX A: SPECIAL NEEDS ADMISSION REVIEW PROCEDURE

#### Introduction

1.1 SCE is committed to promoting an inclusive education. Children with special and additional educational needs will be admitted to SCE schools wherever possible. However, SCE has no special schools, special units or pupil referral units. Furthermore, the geographical spread of SCE schools makes it more difficult than in the UK to provide central or peripatetic support services to schools, including paediatric and therapeutic support. Despite this, very few pupils are refused admission to SCE schools. In the few cases where, following inter-agency discussions, professional opinion has decided that, because the child's needs cannot adequately be met, the child should not be admitted; parents have the right to request an internal review of the decision<sup>4</sup>. This document gives further information about the review procedure.

### **Procedure**

- 2.1 Parents wishing to request an internal review of a special needs admission decision should submit their request in writing to the Assistant Director (Pupil & Family Services), HQ SCE, BFPO 40. The request should include all evidence which the parents want to be taken into account e.g. school reports, psychological or medical reports etc.
- 2.2 On receipt of the parents' written submission and evidence, a review panel will be convened. The panel will have three members, comprising two members of SCE staff at Assistant Director level or above and where possible the Headteacher of an SCE school providing primary or secondary education according to the age of the child who is the subject of the admission review. The panel members and chair of the panel will be selected by the Director of Education or Assistant Director (Pupil & Family Services) and will have had no previous involvement in the decision regarding the child's admission. The panel chair will have knowledge and experience of special needs education. The Headteacher representative on the panel will not be from the school or area to which the child was considered for admission.
- 2.3 The review panel will consider the parents' written submission and a summary of evidence from the case file provided by the Assistant Education Officer (SEN). Witnesses will not be called. The child will not be seen by the panel.
- 2.4 If required, the review panel can call for additional written information or advice, either from the parents or from staff involved with the case.
- 2.5 The review panel will normally meet within 10 working days of receiving the appeal request from the parents. A longer timescale may be needed during school holidays if the relevant staff are not available.

<sup>4</sup> SCE Policy for Special Educational Needs refers.

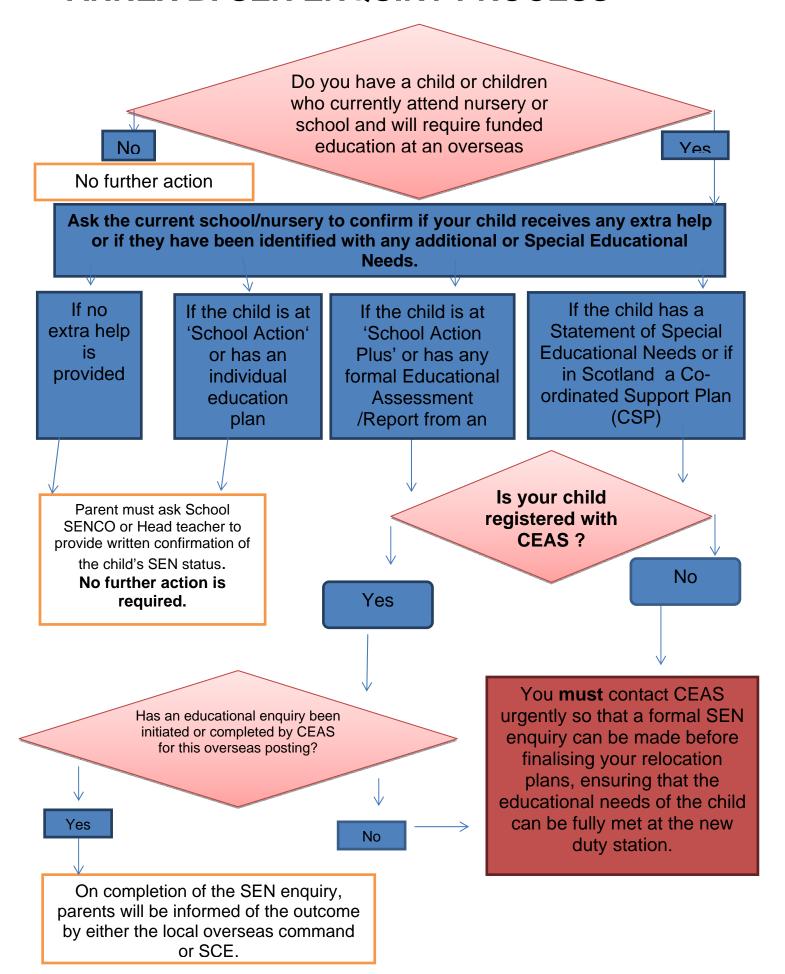
### Outcome

- 3.1 The panel will judge whether the decision not to admit the child into an SCE school, because on the basis of professional advice, the child's special needs cannot be adequately met in an SCE school should be upheld or overturned.
- 3.2 If the panel concludes that the child can be admitted to an SCE school and additional resources are required and that these resources should be provided, the panel will make this recommendation to the Assistant Director (Pupil & Family Services). The commitment of any additional resources by SCE is restricted to educational provision. Where it is necessary to refuse admission because of the unavailability of non-education support services (for example, medical or therapy services), this should be pursued by the child's parents, if wished, with the relevant service provider.
- 3.3 The panel's decision, including the Assistant Director (Pupil & Family Services) decision regarding additional resources will be notified to parents within two working days of the panel meeting.
- 3.4 If, in the interest of continuous improvement, the panel identifies any procedural changes, the panel chair will notify the Assistant Director (Pupil and Family Services) accordingly.

### **Monitoring and Evaluation**

4.1 Review panel decisions and annual statistics regarding special and additional needs admissions will be collected, collated and reported to, the SCE (Pupil and Family Services) leadership team and the SCE Executive Board annually.

## **ANNEX B: SEN ENQUIRY PROCESS**



## **ANNEX C - CONTACTS**

### **MOD Policy**

Pers & Trg – Service & Veterans Welfare Level 6, Zone A Main Building Whitehall London SW1A 2HB

# MOD Additional Needs and Disability Advisor SSAFA

Queen Elizabeth House 4 St Dunstan's Hill London EC3R 8AD

Tel: +44 (0)20 7463 9234 Email: <u>info@ssafa.org.uk</u> Website: www.ssafa.org.uk

### Service Children's Education

HQ SCE JHQ BFPO 40

Tel: +49 (0)2161 4725565 Website: www.sceschools.com

### **Children's Education Advisory Service - Helpline**

Building 190 Trenchard Lines Upavon Pewsey Wilts

SN9 6BE

Tel: +44 (0)1980 618244

Email: <a href="mailto:enquiries@ceas.uk.com">enquiries@ceas.uk.com</a> Website: <a href="mailto:www.ceas.mod.uk">www.ceas.mod.uk</a>

### SINGLE SERVICE

### **RN & RM Policy**

Diversity and Inclusion Policy Officer Navy Command HQ Leach Building MP3-1 Whale Island Portsmouth **PO28BY** 

Tel: +44(0)2392 625706

### **RN & RM Welfare Support**

www.royalnavy.mod.uk/Community/Royal-Navy-Community

East and Overseas NPFS/RMW

Swiftsure Block

**HMS Nelson** 

**HM Naval Base** 

Portsmouth

Hants

PO13HH

Tel: +44 (0)2392 722712

North NPFS/RMW

**Triton House** 

1-5 Churchill Square

Helensburgh

Argyll and Bute

G84 8HL

Tel: +44 (0)1436 672798

West NPFS/RMW

Fenner Block

**HMS DRAKE** 

**HM Naval Base** 

Devonport

**Plymouth** 

Devon

PL2 2BG

Tel: +44 (0)1752 555041

### **Army Policy**

Personnel Services 4 (Army)

**IDL 428** 

Ramillies Building

Monxton Road

Andover

**SP11 8HJ** 

### **Army Welfare Service**

The Army Welfare Information Service,

Building 183,

Trenchard Lines,

Upavon,

Wiltshire

SN9 6BE.

Tel: +44 (0)1980 615975 or 0800 032 6443

Email: AWS-Welfareinformationservice@mod.uk

Website: http://www.army.mod.uk/welfare-support/23199.aspx

### **RAF Policy**

Community Support Ground Floor Hurricane Block RAF High Wycombe Buckinghamshire HP14 4UE

### **RAF Welfare Support**

http://www.raf.mod.uk/community/

SSAFA (RAF)
Queen Elizabeth House
4 St Dunstan's Hill

London

EC3R 8AD

From the UK (Main Line): 0800 731 4880

From Germany: 0800 1827 395

From Cyprus: 800 91065

From the Falkand Islands: #6111

From anywhere in the world: (Call-back) +44 (0)1980 630854

Paradigm dial Homelink access number, then enter \*201 at the PIN prompt

Website: http://www.ssafa.org.uk

### **Overseas Commands**

### Additional Needs and Disability Co-ordinator (BFG)

British Forces Social Work Service Forward Outpatients Building Mercer Barracks BFPO 36

Tel: +49 (0)541 960 2171

For other Overseas Commands refer to the "Disability and Additional Needs - a guide for parents and carers" booklet.

### **Defence Passenger Reserve Centre – Families Section**

Tel: +44 (0)30 679 81013

### Forces Additional Needs and Disability Forum

ANDA Queen Elizabeth House 4 St Dunstan's Hill London EC3R 8AD

Tel: +44 (0)20 7463 9234 Email: info@ssafa.org.uk

Website: http://www.ssafasupportgroups.org.uk

### **Naval Families Federation**

Castaway House Portsmouth Hampshire PO2 8RN

Tel: +44 (0)23 9265 4374 Website: www.nff.org.uk

### **Army Families Federation**

AFF
IDL 414
Floor 1, Zone 7
Ramillies Building
Marlborough Lines
Monxton Road

Andover SP11 8HJ

Tel: +44 (0)1264 382324

Email: additionalneeds@aff.org.uk

Website: www.aff.org.uk

### **RAF Families Federation**

13-15 St Georges Road Wittering Peterborough PE8 6DL

Tel: +44 (0)1780 781650 Email: enquiries@raf-ff.org.uk Website: www.raf-ff.org.uk