

PRIVACY POLICY



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INTRODUCTION

Plenty Valley Christian College has a Privacy Policy and a series of information collection notices that comply with the Privacy Commissioner's guidelines to non-government Colleges. These documents, in part or whole, are available to the College community upon request.

This Policy is designed to enable careful and reasonable handling of personal information to maintain privacy while effectively carrying out the College's functions and activities. The policy covers all personal information supplied to, stored, and used by Plenty Valley Christian College (PVCC), whether of students, parents or guardians, applicants for enrolment, staff, or other people.

The Registrar is currently acting in the role of privacy officer on behalf of the College.

Collecting, storing, and using personal information

1 What is personal information?

- Privacy refers to the need to protect the personal information that the College collects, stores and uses relating to individual students, parents and guardians, applicants for enrolment, staff, job applicants, volunteers, contractors, and other people. It includes personal information on students, parents and guardians held after the period of a student's enrolment at the College. Personal information is information about an individual from which the individual can be identified (or could reasonably be identified). Personal information includes (but is not limited to):
 - Sensitive information such as racial or ethnic origins, political opinions, or affiliations, religious or philosophical opinions or affiliations, sexual preferences or practices, criminal records, scholarship results, exam marks or teachers' notes
 - Health information such as physical or mental health or a disability.

Personal information includes opinions and may be true or not. It may be recorded in some form or other, or not—that is, it could simply be held in someone's memory. If personal information is recorded, it may be in completed forms, correspondence, emails or other types of documents or records.

2 What kinds of personal information will the College collect and hold?

The College will not collect personal information unless it is reasonably necessary for one or more functions or activities of the College. Personal information may include educational and academic records, student behaviour and disciplinary records, addresses, dates of birth, phone numbers, health information, physical characteristics, sports information, and information about co-curricular activities.

3 How will the College use the personal information you provide?

The College will use personal information it collects from you for the primary purpose of collection, and for such other secondary purposes that are related to the primary purpose of collection and reasonably expected, or to which you have consented.

4 Students and parents

The College primarily collects personal information on students and parents to enable it to provide schooling for the student, including satisfying both the needs of parents and the needs of the student through the period of the student's enrolment.

Purposes include:

- Keeping parents informed about matters related to their child's schooling, through correspondence, newsletters, and magazines.
- Carrying out day-to-day administration
- Looking after students' educational, social, and medical wellbeing
- Seeking donations and marketing for the College
- Satisfying the College's legal obligations and allowing the College to discharge its duty of care.

In some cases, if we don't receive the personal information, we ask for, the College may not be able to enrol or continue the enrolment of the student.

5 Job applicants, staff members and contractors

The College's primary purpose in collecting personal information of job applicants, staff members and contractors is to assess and, if successful, to engage the applicant, staff member or contractor.

Purposes include:

- Administering the individual's employment or contract
- Satisfying insurance requirements
- Seeking funds and marketing for the College
- Satisfying the College's legal obligations; for example, meeting child protection legislation.

6 Volunteers

The College obtains personal information about volunteers who assist the College in its functions or conduct associated activities to enable the College and the volunteers to work together.

7 Marketing and fundraising

Marketing and seeking donations for the future growth and development of the College ensures the College continues to be a quality learning environment in which both students and staff thrive.

Personal information held by the College may be disclosed to an organisation that assists in the College's fundraising.

Parents, staff, contractors, and other members of the wider College community may from time to time receive fundraising information. College publications, like newsletters and magazines, which include personal information, may be used for marketing purposes. A person may opt out of receiving marketing and fundraising material at any time by contacting the College.

8 Collecting and using personal information

(a) How we collect personal information

The College will usually collect personal information via forms filled out by parents or students, through face-to-face meetings and interviews, and via telephone calls. On occasions people other than parents and students provide personal information; for example, via a report provided by a medical professional or a reference from another College.

(b) Consent

We will only collect personal information where we have consent, except in cases where we consider collecting personal information is necessary to lessen or prevent a serious threat to life, health, or safety, and it is impractical to get consent.

(c) Applications to enrol

At each stage of the enrolment application process, we will only request personal information necessary to complete that stage of the process, including assessing the suitability of any application against the selection criteria. We will advise parents how the information will be used.

Where applicants are unsuccessful, we will only retain the applicant's information on file if consent is given by the parent or guardian; otherwise, the information will be destroyed.

(d) Using photos

We will not use photos of students in newsletters, web sites or other publications if we have not been given permission. We will only publish the name of students in newsletters, web sites and on social media, student surnames, will not be published.

(e) Unsolicited personal information

If we receive unsolicited personal information, we will destroy it unless we are permitted to hold the information and it is needed carry out our functions or fulfil our duty of care to students or staff. If we retain the information, it will be stored in a similar way to all other personal information.

(f) Storing personal information

We will store personal information securely so that it can only be readily accessed by a staff member with a legitimate reason for using it, and it is protected from interference, misuse, loss, or unauthorized access.

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Personal information about students, parents, or staff that we keep in databases will be protected from general access by effective security arrangements such as passwords so that only those with a legitimate reason can gain access to the information relevant to them.

Workstations and software applications such as email will log off after a predetermined period of inactivity to prevent unauthorized access when they are unattended.

Personal information on paper will be kept in locked storage and be protected by any other security measures appropriate to maintaining the required level of confidentiality and privacy. Documents with personal information must not be left visible and unattended in work areas.

(g) When personal information is no longer needed

When personal information is no longer needed for the purpose for which it was collected, we will destroy it (or de-identify it).

9 Privacy Officer

The College has appointed a Privacy Officer, who:

- Maintains a register of the College's forms that hold personal information (see the Appendix)
- Arranges for regular training of relevant College staff in handling personal information so that privacy requirements are met.
- Audits College administrative practices at least annually to ensure all types and locations of personal information have been identified and the privacy requirements of this policy are being met and recommend to the Principal modifications or improvements to information handling processes or staff training.

10 Transparency and access

10.1 Making our privacy policy available

We will make the policy readily available by posting it on the College website.

10.2 Accessing personal information

We will make available a student's personal information if requested by the student's parent or guardian if it is reasonable to do so. Requests must be made in writing to the Registrar by completing the Application for Access to Information form Available from the General Office. If we decide not to provide access to the information, the Registrar will give the reasons in writing.

10.3 Who might the College disclose personal information to?

The College may disclose personal information, including sensitive information, held about an individual to:

- Another Information Sharing Entity (ISE) which may include the some of the following:

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- Another School
- Government departments
- Medical practitioners
- People providing services to the College, such as mediation agencies, specialist visiting teachers and sports coaches
- Recipients of College publications, like newsletters and magazines
- Parents
- Anyone you authorise the College to disclose information to.

We will not provide personal information to a third party unless we have consent from the parent or guardian, or we are legally required to do so for example, we will not supply personal information on a student to a third party who is paying that student's College fees without the consent of the parents or guardians. Legal requirements to provide information may include child protection, law enforcement, court orders and public health or safety issues or an ISE with a valid reason to request the information.

The College will not send personal information about an individual outside Australia without:

- Obtaining the consent of the individual (in some cases this consent will be implied)
- Otherwise complying with the National Privacy Principles.
- The College will Supply personal information to parents/guardians of FFPOS (Full Fee-Paying Overseas Students) outside of Australia.

11 Corrections and complaints

11.1 Correcting information

We will make reasonable efforts to keep personal information accurate, up-to-date, and complete. Where advised by a student, parent, or guardian that the personal information we are holding is incorrect or incomplete, we will correct our records.

11.2 Complaints

Where the College holds personal information on an individual and that person (or their parent or guardian) has a complaint relating to the privacy of the information, the complaint should be made in writing to the Registrar or the Principal. If you make an initial verbal complaint, the College may request you to make the complaint in writing to the Registrar or the Principal so that the specific issues are clearly understood.

In some circumstances, someone making a complaint may wish to maintain anonymity (or pseudonymity). We will respect this desire in handling the complaint.

The Registrar will handle all complaints of breaches of this privacy policy, reporting regularly to the Principal on the progress and outcome of each complaint.

If the College does not respond to a complaint after 30 days, a complaint can be made to the Australian Information Commissioner at <http://www.oaic.gov.au/privacy/privacy-complaints>.

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12 Legislative requirements

Our privacy policy follows the Australian Privacy Principles found in Schedule 1 of the Privacy Amendment (Enhancing Privacy Protection) Act 2012 (Cth).

12.1 Accountabilities

Role	Accountabilities
Principal	<ul style="list-style-type: none">• Provide resources so that systems and facilities for holding and using personal information maintain privacy.• Monitor complaints about privacy to ensure satisfactory resolution.
Registrar	<ul style="list-style-type: none">• Ensure processes are in place to provide for secure handling of personal information, both in hard copy and computer databases, so privacy of the information is maintained.• Provide for information to be kept up to date, corrected where necessary, and destroyed once it is no longer needed.• Receive and respond to requests for access to personal information. Provide written reasons if access is to be refused.• Receive and resolve any complaints about privacy.• Maintain the register of the College's forms that hold personal information.• Arrange for training of relevant College staff in handling personal information.• Audit the College's administrative practices at least annually to ensure the privacy requirements are being met.• Recommend to the Principal modifications or improvements to information handling processes or staff training.
Staff	<ul style="list-style-type: none">• Never access and use personal information unless it is required to do your work.• Maintain the privacy of personal information, including information you know even though it isn't written down.

12.2 Definitions

Term	Definition
Personal information	<p>Information or an opinion about an identified individual, or an individual who is reasonably identifiable:</p> <ul style="list-style-type: none">• whether the information or opinion is true or not; and• whether the information or opinion is recorded in a material form or not.

References

Legislative and other external references

- Privacy Act 1988 (Cth)
- Privacy Amendment (Enhancing Privacy Protection) Act 2012 (Cth) (includes Australian Privacy Principles in Schedule 1)

Appendix 1

Procedure for SHARING INFORMATION UNDER THE CISS AND FVISS

Applying the threshold test

Before sharing information with other Information Sharing Entities (ISE)'s the threshold test requirements must be met.

The requirements for sharing are different depending on the purpose of the sharing, if sharing for both purposes (Child Wellbeing or Safety and/or Family Violence), you must meet the requirements of each of the schemes.

Although child wellbeing and safety takes precedence over an individual's privacy, privacy must still be protected through careful and selective information sharing.

Threshold requirements for the Child Information Sharing Scheme:

1	The information sharing entity is requesting or disclosing confidential information about any person for the purpose of promoting the wellbeing or safety of a child or group of children; and
2	The disclosing information sharing entity reasonably believes that sharing the confidential information may assist the receiving information sharing entity to carry out one or more of the following activities: <ul style="list-style-type: none">• make a decision, an assessment or a plan relating to a child or group of children• initiate or conduct an investigation relating to a child or group of children• provide a service relating to a child or group of children• manage any risk to a child or group of children; and

3	<p>The information being disclosed or requested is not known to be 'excluded information' under Part 6A of the <i>Child Wellbeing and Safety Act</i> (and is not restricted from sharing by another law), information that could:</p> <ul style="list-style-type: none"> • endanger a person's life or result in physical injury • prejudice a police investigation or interfere with the enforcement or administration of the law; prejudice a coronial inquest; prejudice a fair trial of a person • be legally privileged • reveal a confidential police source • contravene a court order • be contrary to the public interest • information sharing would contravene another law.
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Threshold requirements for the Family Violence Information Sharing Scheme:

1	<p>The purpose of sharing is to assess family violence risk OR protect victim survivors from family violence risk.</p> <p>There are two purposes for which information can be shared between ISEs:</p> <ul style="list-style-type: none"> • Family violence assessment purpose: the purpose of establishing or assessing the risk of a person committing family violence or being the subject of family violence. This would include: <ul style="list-style-type: none"> - establishing family violence risk - assessing the risk to the victim survivor - correctly identifying the perpetrator. • Family violence protection purpose: once family violence risk is established, to manage the risk to the victim survivor. This includes information sharing to support ongoing risk assessment.
2	<p>The applicable consent requirements are met.</p> <p>Is the consent required when a child is at risk of family violence?</p> <ul style="list-style-type: none"> • Consent is not required from any person to share information relevant to assessing or managing family violence risk to a child. However, you should seek the views of the child and non-violent family members where it is safe, reasonable, and appropriate to do so. • Where a child is 18 years of age or older, they are an adult and so you may need their consent to share their information, or the information of third parties, unless you can legally share under existing privacy laws or when there is a child at risk. <p>In situations where an adolescent is using family violence against an adult family member, you may need the consent of the adult victim survivor to share their information.</p>

3	<p>The information is not excluded information. Excluded information is information that could:</p> <ul style="list-style-type: none">• endanger a person’s life or result in physical injury.• prejudice a police investigation or interfere with the enforcement or administration of the law; prejudice a coronial inquest; prejudice a fair trial of a person be legally privileged.• reveal a confidential police source.• contravene a court order.• be contrary to the public interest.• information sharing would contravene another law.
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Making a request to another Information Sharing Entity

Before disclosing information under the Child Information Sharing and Family Violence Information Sharing Scheme, it is important that information sharing entities take reasonable care to verify the identity of the professional or service and ensure that they are an information sharing entity.

- The ISE list is a searchable database that can be used to identify organisation and services prescribed under the CISS and FIVSS.
- Before making a request, check to see if the organisation is a prescribed entity via the Access the ISE list: <https://iselist.www.vic.gov.au/ise/list/>
- Refer to Information Sharing Entity List Uses Guide on how to navigate the database.
- ISE’s should respond to requests for information in a timely manner, including when they are declining to provide information in response to the request.
- If an ISE is declining a request from another ISE, they are required to provide written reasons for doing so.

Making a request or receiving a request under the Child Information Sharing Scheme

An ISE may request information when it meets the first and third parts of the threshold. That is, the information being requested is:

- to promote the wellbeing or safety of a child or group of children
- not excluded information under the Child Information Sharing Scheme to their knowledge.

ISE should use professional judgement to decide which organisation or service to request information from, taking into account the following:

- the activity the requesting information sharing entity is seeking to undertake and the type of information that may assist them
- the roles and responsibilities of other information sharing entities and the information they are likely to hold

- the currency and relevance of the information other information sharing entities are likely to hold.

The ISE requesting the information should provide sufficient detail to enable the responding ISE to make a decision about whether all three parts of the threshold have been met, in order to assist them to:

- identify relevant information to respond to the request
- form an opinion about whether the information may be disclosed under the CISS (whether the disclosure meets the threshold).

When making a request, an ISE may disclose any confidential information that may assist the responding ISE to:

- identify the information they hold that is relevant to the request
- form an opinion on whether the information may be disclosed under the scheme.

If the legal requirements (or threshold) of the scheme are met, an ISE:

- **may** make requests for information to another ISE
- **must** disclose relevant information to another ISE, if requested
- **may** disclose information voluntarily (proactively) to other ISE's.

ISE's will use their expertise and exercise their professional judgement to identify:

- the range of needs and risks that impact on a child's life to inform a decision as to whether the threshold is met
- what and how much information to share
- who to share with to support improved service delivery and promote the wellbeing or safety of the child or children.

Making a request or receiving a request under the Family Violence Information Sharing Scheme

Under Part 5A of the *Family Violence Protection Act 2008* (FVPA), ISEs may request or share information with other ISEs about a person that is relevant to assessing or managing a family violence risk. The information may relate to a victim survivor (adult or child), alleged perpetrator/perpetrator or third party.

Only information that is relevant to assessing or managing a risk of family violence can be shared under the Scheme. In determining what information is relevant, practitioners should use their professional judgement and refer to the Family Violence Policy.

Where an ISE receives a request, it must share that information, either verbally or in writing, provided that the information meets the requirements (the threshold) of the Scheme. The onus is on the ISE sharing information to ensure that they are disclosing information about a person in accordance with the law. There is no restriction on an ISE making a request.

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If there is no existing relationship with the ISE the information is being requested from, verification may need to take place (e.g., by sending an email with the entity's official account).

There are **two purposes** for which ISEs can share information with each other under the FVPA, Part 5A:

- (a) for family violence assessment purposes
 - Only prescribed risk assessment entities (RSE) are entitled to make requests and receive information for a family violence assessment purpose, which focuses on identifying who the 'actual' perpetrator and victim survivor are and establishing the level of risk the perpetrator poses to the victim survivor.

OR

- (b) for family violence protection purposes
 - Any prescribed ISE is permitted to request and receive information for a family violence protection purpose. The focus at this stage is about managing the risk of the perpetrator committing family violence or the victim survivor being subjected to family violence. This could include information sharing as part of ongoing risk assessment.

Once it has been established which purpose the information is to be exchanged, ensure that:

- sufficient information is provided to the ISE to help them identify what information they hold that might be relevant and whether they should disclose that information.
- the purpose of the information is clearly identified and why it is believed the information is relevant.
- precedence is given to a victim survivor's right to be safe from family violence when discussing relevant information.
- record keeping is completed, including the name of the service that was contacted, the name of the ISE and the information that was disclosed.
- any risk assessment or safety plan are documented, as a result of the information sharing.
- information is used only for a purpose permitted by law.
- if information request is refused, record this refusal in writing and keep this refusal on file.

Sharing information for risk assessment:

Once a reasonable belief has been established that family violence risk is present and the identity of the perpetrator or victim survivor/s are clear (e.g., the victim survivor has identified the perpetrator), this would enable any ISE to make referrals for specialist services or professionals to complete a comprehensive family violence risk assessment. Some of these specialist services are prescribed as Risk Assessment Entities (RAEs) (refer to Table 1).

ISEs can share relevant information proactively or on request with RAEs for risk assessment purposes. That is, in order to:

- confirm whether family violence is occurring

- enable RAEs to assess the level of risk the perpetrator poses to the victim survivor
- correctly identify the perpetrator who is using family violence.

Family violence risk assessment is an ongoing process and is required at different points in time from different service perspectives. Education and care services will have a role in working collaboratively with other services to contribute to ongoing risk assessment and management of family violence.



Figure 1: Overview of activities when sharing information for risk assessment

Victoria State Government, 2021. Information Sharing and Family Violence Reforms Contextualised Guidance. Melbourne, p.38.

ISEs can only share information with other ISEs that are not RAEs. Request information from RAEs once family violence risk is established and the identity of the perpetrator and victim survivors are known. This is to prevent sharing that might escalate risk to a child or family member.

Sharing for risk management (protection):

Once family violence is established, ISEs can share proactively with other ISEs and request information, including from RAEs, if they reasonably believe sharing is necessary to:

- remove, reduce, or prevent family violence risk
- understand how risk is changing over time
- inform ongoing risk assessment.

This opens a two-way flow of information that enables ISEs to form a complete picture of risk and collaborate to support children and families experiencing family violence.

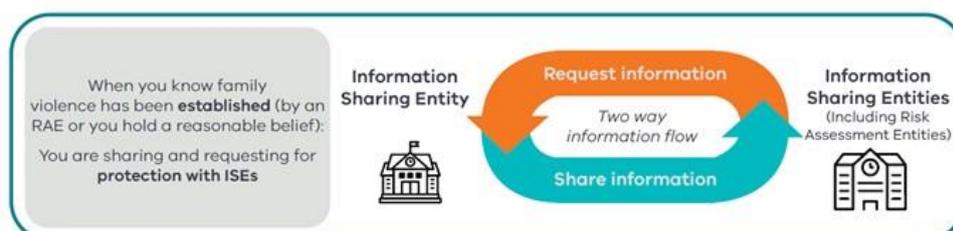


Figure 2: Overview of activities when sharing information for risk management (protection)

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Victoria State Government, 2021. Information Sharing and Family Violence Reforms Contextualised Guidance. Melbourne, p.39.

When making a request, ensure you are speaking with someone suitably trained to use Part 5A of the Family Violence Protection Act 2008 (FVPA).

Table 1

Information Sharing Entities that are also Risk Assessment Entities	
<ul style="list-style-type: none"> • State-funded specialist family violence services (including refuges, Men’s Behaviour Change Programs, family violence counselling and therapeutic programs) • Risk Assessment and Management Panel (RAMP) members (including those services that would not otherwise be prescribed but only when participating in a RAMP) • State-funded sexual assault services 	<ul style="list-style-type: none"> • Child Protection • Child FIRST services (excluding broader family services) • Victims Support Agency (including Victim Assistance Programs and Victims of Crime Helpline) • Victoria Police • The Orange Door services.
Information Sharing Entities	
<ul style="list-style-type: none"> • Magistrates’ Court of Victoria officials • Children’s Court of Victoria officials • Corrections Victoria and Corrections-funded services • Adult Parole Board • Youth Justice (including the Secretariat to the Youth Parole Board) and Youth Justice funded services • Multi-Agency Panels to Prevent Youth Offending • Justice Health and funded services • State-funded sexually abusive behaviour treatment services • State-funded perpetrator intervention trials • Registered community-based child and family services 	<ul style="list-style-type: none"> • Maternal and Child Health • Registered out of home care services • DHHS Housing • State-funded homelessness accommodation or homelessness support services providing access point, outreach, or accommodation services • Designated mental health services • State-funded alcohol and other drug services • Tenancy Advice and Advocacy Program • State-funded financial counselling services • Commission for Children and Young People • Disability Services Commissioner.

Record keeping

ISEs have specific record keeping obligations under the FVISS and the CISS. ISEs can choose how they will meet their record keeping obligations, which might include written or online case notes, specific record keeping forms or IT solutions, and are in line with the *Privacy and Data Protection Act 2014* (Vic) and, where applicable, the Australia Privacy Principles obligations.

When an ISE receives a request to share information they must record:

- the ISE that requested the information
- the date of the request
- the information that was requested
- if refusing a request, the request, and the reason why it was refused.

When an ISE shares information (either proactively or on request) they should:

- know and record what scheme they are sharing under (FVISS, CISS or both)
- know and record whom information is being shared about
- record how the threshold for sharing was met.
- relevant risk assessments or safety plans that have been prepared for a person at risk of family violence.

Documentation is also required if sharing about:

- adult victim survivors of family violence or third parties under FVISS (where a child is at risk)
- a child's parent under CISS
- child victim survivors of family violence
- any child in order to promote their wellbeing or safety.
- whether their views were sought about sharing their information
- if their views were not sought, record the reason why
- if they were informed that their information was shared
- whether information was shared with consent and whether the consent was written, verbal or implied
- if the information was shared without consent, record the reason why
- if the information was shared without consent, record if the person was informed that their information was shared without consent

Examples of record keeping forms can be found at: www.vic.gov.au/guides-templates-tools-for-informationsharing

Handling information sharing and risk assessment complaints under the CISS and FVISS.

Types of complaints

ISEs may receive complaints from:

1. Individuals in relation to privacy breaches, for example the ISE has:
 - misidentified an adult victim survivor as a perpetrator and shared information about them without consent
 - shared information that is not relevant to the purpose for which it was shared.
2. Individuals in relation to any other conduct under the Schemes, for example the ISE has:
 - not sought the views of a child and/or relevant family member and the complainant believes it was reasonable, safe, and appropriate to do so
 - in the view of the complainant, failed to foster positive relationships between a child and significant people in the child's life, in the way they applied the Schemes.
3. Other ISEs in relation to how the ISE is sharing information under the Schemes. For example, an ISE may make a complaint about:
 - another ISE refusing to share relevant information that should be shared
 - the timeliness of responses.

Complaints record keeping

The following information must be recorded if a complaint is received under the Schemes:

- date the complaint was made and received
- nature of the complaint
- action taken to resolve the complaint
- action taken to lessen or prevent the issue from recurring
- time taken to resolve the complaint
- if the complaint was not resolved, further action that was taken.

Note: accepted standard practice is that a response should be provided within 30 days of receiving the complaint. All complaints must be handling according to the *Privacy and Data Protection Act 2014* (Vic) and, where applicable, the Australia Privacy Principles

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DOCUMENT HISTORY AND VERSION CONTROL RECORD

Name of document: Privacy Policy

Responsible officer: Registrar

Approved by: Principal

Assigned review period: Biennial

Date of next review: May 2023

Category: College Community

Version number	Version date	Responsible officer	Amendment details
1.0	11/04/2002	Privacy Officer	Board approved policy
1.1	17/07/2006	Privacy Officer	Initial issue as a controlled document
1.2	13/12/2011	OH&S Admin	Phone number changes
1.3	08/10/2013	Privacy Officer	Minor changes and dates
2.0	28/04/2014	Registrar	Policy reviewed to incorporate new Privacy Laws
2.1	02/06/2014	Principal	Minor Changes
2.2	07/09/2017	S Taggart	Changed to Biennial as discussed in OHS Meeting 07/09/2017.
2.3	20/3/2018	Principal	Updated changes to the use of students' surnames
2.4	28/05/2020	Principal	Reviewed and approved
2.5	29/05/2021	Principal	Added support for CISS and FVISS and sharing procedures under those schemes
2.6	02/06/2021	Principal	Minor changes

Approved by:



John Metcalfe
Principal

02/06/2021
Date.