

Acquisitions Policy

Section 1 - Purpose

The purpose of this policy is to set out the principles and priorities guiding the selection of new acquisitions for the Tasmanian Museum and Art Gallery (TMAG) and to ensure its legal and ethical obligations are observed in continuing to develop the collection.

The objectives of this policy are to ensure that:

- a) TMAG's activities are consistent with TMAG's Strategic Plan, Act, and Ministerial Statement of Expectations
- b) TMAG applies rigorous, ethical and accountable standards in the consideration, assessment and negotiation of acquisitions;
- c) Acquisitions to the collection are considered and approved in accordance with established delegated authority;
- d) Conditions of acceptance and documentation requirements for acquisitions are in accordance with established policies and procedures;
- e) TMAG meets the standards of accreditation schemes.

These objectives are to be achieved by ensuring that TMAG:

- a) Acquires items that fit within TMAG's collecting priority areas as outlined in the discipline-specific policies (see 6.1 Internal Reference Material);
- b) Collection practices and procedures are transparent;
- c) Obtains valid legal title and other documentation for items acquired for the collection;
- d) Avoids any act or omission that may compromise TMAG's position and reputation for integrity.

1.1 Scope

This policy applies to all activities relating to the acquisition and accessioning of items into the TMAG collection.

TMAG's collections are reflected in TMAG's strategic Plan four areas of focus:

- 1) An island in a changing world
- 2) First Peoples of *lutruwita* Tasmania
- 3) Migration, heritage and resistance
- 4) Southern extremes and perspectives

The collections subjects are managed within the four main curatorial disciplines:

- 1) Art - incorporating:
 - Art
 - Decorative Arts
- 2) Cultural Heritage – incorporating:
 - Tasmanian history
 - Antarctic and Southern Ocean
- 3) First Peoples Art and Culture – incorporating:
 - Tasmanian Aboriginal
 - Australian Aboriginal
 - Pacific
 - Non-Australian material
- 4) Natural Sciences – incorporating:
 - Botany
 - Zoology
 - Geology

1.2 Authority

This policy is established by the Director and approved by the Board of Trustees (the Board) pursuant to the *Tasmanian Museum and Art Gallery Act 2017* (the Act).

Section 2 – Glossary / Definitions

Aboriginal or Torres Strait Islander art

Artwork by an Aboriginal or Torres Strait Islander artist or containing Aboriginal or Torres Strait Islander themes or content.

Accession

The process which formally acknowledges an item as part of the Collection and, *prima facie*, an item to be held in perpetuity.

Acquisition

The process of obtaining valid legal title to an item. Items may be acquired through various methods for the purpose of accessioning into the Collection or acquired and not accessioned.

Act

Act means the *Tasmanian Museum and Art Gallery Act 2017*.

Bequest

A gift or form of pledge made to TMAG, forming part of a donor's will, to be received under a will following the donor's death.

Board

The Board of Trustees of the Tasmanian Museum and Art Gallery.

Collection

All objects, including artworks and scientific specimens, in various media that are TMAG property and have been formally accessioned.

Conflict of interest

A situation where the personal interests of an individual working for, or representing, an organisation actually, potentially or are perceived to conflict with that organisation's interests.

Deed of Gift

A formal, legally binding document that establishes that title to an item is given to TMAG as a gift. TMAG's Deed of Gift template also outlines the terms and conditions of the gift and its acceptance.

Director

The Director of the Tasmanian Museum and Art Gallery.

Donor

An individual, organisation or group who has made or is proposing to make a gift to TMAG.

Due diligence

Due diligence means a comprehensive assessment of an item to evaluate its authenticity, ownership and provenance and to identify and assess any gaps in these.

Gift

The gratuitous transfer of property and title of the donation. A fractional gift means that a donor retains partial ownership of the donation. A restricted gift obliges the institution to comply with certain requirements that govern the gift's use, attribution, display or future disposition.

Incoming loan

Incoming loan means any form of contracted arrangement for the transfer of possession of a work to TMAG on a temporary basis under which the transferor grants a temporary right of possession to TMAG.

The terms *lender*, *borrower*, *lending* and *borrowing* and *loan* and all related or derivative terms are to be construed in the context of this definition and unless otherwise specified, references to incoming loan or any related terms may apply to proposed, contemplated, potential, approved or realised loan arrangements.

Provenance

The full history and chain of ownership of an item from the time of its discovery or creation to the present day, through which authenticity and legal title are determined.

Purchase Agreement

A formal, legally binding written contract which outlines the rights, obligations and undertakings of the buyer and seller and outlines the terms and conditions of the sale and the transfer of both property and title.

Repository of last resort

An occasion where an institution acts as a repository for unprovenanced, illicitly collected or recovered specimens and objects from the territory over which it has lawful responsibility in order to protect such objects from destruction or deterioration, in line with clause 2.11 of ICOM's Code of Ethics for Museums.

Significance

The historical, aesthetic, scientific or social values that a museum object or collection has for past, present and future generations and communities.

Title

The legal right to ownership of property. This may be supported by full evidence of every transaction subsequent to the first owner's title.

Section 3 – Policy

3.1 Statement of Principles

Acquisitions are integral to develop TMAG's collection and ensure that it continues to fulfil its institutional objectives, as outlined in the Act.

TMAG is committed to developing its collection according to the highest ethical standards and legal requirements. TMAG shall undertake provenance and due diligence research in relation to all proposed acquisitions to ensure that:

1. Provenance of the item is established;
2. Authenticity of the item is established;
3. Legal title to the item is clearly ascertained; and
4. There is no reasonable cause to believe the item has been looted, illegally obtained or exported, or the subject of unauthorised or unscientific fieldwork.

TMAG ensures that all acquisitions are negotiated and managed on terms that are ethical, responsible and visible to public scrutiny and maintains TMAG's standing and reputation for collecting excellence.

TMAG recognises the UNESCO Convention on the Means of Prohibiting and Preventing the Illicit Import, Export and Transfer of Ownership of Cultural Property 1970 (the Convention) and acknowledges that Australia is a signatory to the Convention. TMAG also recognises and is bound by the terms of the Protection of Movable Cultural Heritage Act 1986 and is guided by the International Council of Museums (ICOM) Code of Ethics, Museums Australia Code of Ethics, Australian Best Practice Guide to Collecting Cultural Material and the National Standards for Australian Museums and Galleries.

3.2 Collecting Priorities

TMAG's collection development is guided by:

- The TMAG Strategic Plan
- The collecting priority areas developed by each specialist curatorial area (see 6.1 Internal reference Material) and
- The relative significance of objects, assessed by TMAG's curatorial staff with expertise in the relevant discipline, according to their professional judgement and in reference to the guidelines outlined in *Significance 2.0; a guide to assessing significance of collections*.

3.3 Other Considerations in Collecting

3.3.1 Provenance

Items acquired for the collection should have a documented provenance that, ideally, extends back to the object's initial discovery or manufacture.

TMAG acknowledges that complete and unbroken records of ownership are rare. The provenance of works may contain gaps or may not be able to be verified through documentary evidence. TMAG recognises that there are many reasons for such gaps, ranging from a past owner's desire for anonymity, to an absence of transaction records arising from historic practices. Resolving provenance gaps, particularly during periods of war, conflict, political upheaval or natural disaster, may be complicated further because relevant records have been lost or destroyed.

For further information see the *Provenance and Due Diligence Research Policy*.

3.3.2 Due Diligence

When considering acquiring items for the collection, TMAG will practice the highest standards of due diligence. As a general principle, TMAG will not acquire an item unless it can acquire valid legal title through provenance and due diligence research.

To establish the provenance of an item, the relevant curator will carry out thorough research before proposing the item for acquisition, in accordance with TMAG's *Provenance and Due Diligence Policy and Procedures*.

TMAG will evaluate gaps or discontinuities in provenance or undocumented transactions to ensure no evidence or reasonable cause for suspicion can be found about the procurement of the work by its current owner, or any prior transactions or exchanges.

In order to gather information, TMAG may initiate inquiries of prospective donors, sellers, lenders and third parties to seek to address gaps in provenance or ascertain the legal and ethical status of an artwork. For further information see the *Provenance and Due Diligence Research Policy*.

3.3.3 TMAG to act as Repository of Last Resort

TMAG may acquire items without documented histories in circumstances where TMAG will act as a Repository of Last Resort, in line with Section 2.11 of the ICOM Code of Ethics for Museums.

3.3.4 Conditions and Care

TMAG will consider the factors that may impact on the condition, care and preservation of an item prior to its acquisition, including any issues or unusual costs in relation to:

- The current condition and/or long-term care of the item;
- The storage and movement of the item, including but not limited to long-term storage issues and costs and WHS issues; and
- Documentation, display and loan.

3.4 Methods of Acquisition

3.4.1 Gifts, Donations and Bequests

1. *Right to refuse unsolicited gifts, donations and bequests*

TMAG reserves the right to refuse unsolicited donations, gifts and bequests.

2. *Acquisition procedure for unsolicited gifts, donations and bequests*

When an unsolicited donation, gift or bequest is received, the Curator in the relevant discipline may choose to make an acquisition proposal on the basis of the item's cultural, historical, artistic, or scientific value, as ascertained by the Curator using their professional judgement.

If an unsolicited bequest is approved for acquisition, a copy of the will, codicils and any other related documentation will be retained as part of TMAG's records.

3. *Disposal of unsolicited gifts, donations and bequests*

Unsolicited donations, gifts or bequests that are not proposed for acquisition, or for which the acquisition proposal is not accepted, will, if possible, be returned to the donor (or his or her estate). If the donor is unknown, cannot be located, or the item cannot be returned for legal or other reasons, the item will be considered

abandoned.

TMAG reserves the right to dispose of such items in accordance with the Act and the *Unclaimed Material Procedure* and *Deaccession and Disposal Policy*.

4. *Fractional gifts*

TMAG will not accept fractional gifts without a written statement of intent that requires the donor to transfer the remaining interest within a specified time period.

5. *Restricted gifts*

As a general principle, TMAG will not accept restricted gifts. Restricted gifts may be proposed for acquisition through the normal process (as outlined at 3.6.1), with the stipulation that any potential benefits of the gift are carefully weighed against the short- and long-term impacts of any restrictions on TMAG's operations. The acquisition documentation for a restricted gift, if acquired, must contain a written cost/benefit assessment that supports the acquisition.

3.4.2 Purchases

1. *Dealers, commercial companies and private individuals*

Items may be purchased from dealers, commercial galleries, shops, private individuals and companies, for the purpose of acquisition and accession into the collection. All items so purchased are subject to the normal acquisition's approvals process outlined at 3.6.1. Items will not be considered for purchase unless full funding has first been secured, except in the case where the Board determines otherwise.

Although in law warranty of title is implied in the sale of goods, items that are purchased for the purpose of acquisition shall be accompanied by documentation that stipulates:

- a) The seller's right to transfer title of the item to TMAG;
- b) A warranty of authenticity; and
- c) The seller's guarantee that the item is free from restrictions and/or encumbrances.

2. *Purchase at Auction*

Items purchased at auction are made on the auction house's terms and these may take the place of a purchase agreement. The auction house's terms of sale must be evaluated for warranty of title and authenticity in accordance with this policy.

3. *Joint purchases at Auction*

Joint purchases at Auction with any other party must be treated with caution and activities must not consist of anti-competitive behaviour or be in contravention of the *Competition and Consumer Act 2010*.

3.4.3 Commissions

TMAG may acquire works of art by contracting an artist to produce a work for the collection. The terms and conditions of the commission will be outlined in the acquisition proposal approved by the relevant delegate and the memorandum of understanding established between TMAG and the artist/s, which will be in accordance with the terms of 3.4.2.1.

The terms and conditions of the commission will be stipulated in a contract approved and signed by the appropriate TMAG &/or Department of State Growth delegate. Depending on the financial cost, commissions may need to go through a formal Department of State Growth Procurement process.

3.4.4 Exchanges

TMAG may acquire material through exchange programs with other institutions.

The donation of surplus material through exchange programs is authorised as per approved delegations.

3.4.5 Field Collections

Collecting from nature must be in accordance with relevant Federal and State legislation, conventions, and relevant TMAG Policies and Procedures, as per Section 5 of this Policy, and with the appropriate permit issued to the collector.

3.4.6 Transfers from government agencies

In accordance with the Act TMAG is to be notified of material intended for disposal from other government agencies that might be of State significance. Assessment of the material and any subsequent transfer to TMAG must be in accordance with the Act and the *Transfer from Government Agencies Procedure*.

3.4.7 Other

Acquisitions that do not conform to this policy will only be made in exceptional circumstances after consideration by the Board, having regard to the Principles of the Policy, relevant legislation, and the interests of other museums and the community.

3.5 Ineligible Items

Items in the following categories will not be acquired by TMAG:

1. Ammunition;
2. Explosives;
3. Items that contain or are made of hazardous materials that TMAG does not have the equipment, facilities or PPE to manage (e.g. chemical, radioactive, asbestos, etc.).

TMAG will not acquire items where the donor holds copyright and the copyright is not transferred or licensed to TMAG, unless this arrangement is specifically approved by the Board of Trustees.

Cultural objects/artworks or collections containing human material (e.g. hair, bone) are to be assessed on a case-by-case basis by the relevant department and FPAC. Determinations for Indigenous Australian human remains must follow the *Commonwealth Repatriation Policy 2016*.

TMAG will not acquire items where there is reasonable cause to suspect that their provenance includes unauthorised or unethical fieldwork, or intentional destruction or damage to cultural, archaeological or geological sites, or of species and natural habitats. Where such destruction or damage is legal (e.g. forestry coupes) TMAG will assess the ethical considerations on a case by case basis.

TMAG will not acquire items or specimens where there is reasonable cause to suspect that they have been collected, sold, or otherwise transferred in contravention of local, national, regional or international law or treaty relating to wildlife protection or natural history conservation, including the CITES Convention and other Conventions listed at 6.2.

3.6 Approval of Acquisitions

Acquisitions to the collection are approved by the Board or its delegate, as described in the TMAG Manual of Authorities:

Position title	Purpose	Conditions
Director	Approve acquisitions	<p>Must be in accordance with Treasurer's Instructions, the Acquisition Policy, the Act, within portfolio responsibilities and approved budget.</p> <p>Acquisition can incur costs of no more than \$20,000.</p> <p>For acquisitions incurring costs between \$5001 and \$20,000 the Board would be notified at the time of acquisition for information.</p>

		For acquisitions incurring costs up to \$5,000 would be listed as part of the regular Directors report for the Board, once accessioned.
Deputy Director, Collections and Research	Approve acquisitions, excluding purchases, conditional gifts and acquisition by retention of unclaimed material	Must be in accordance with the Acquisition Policy and the Act. Acquisition cannot incur any costs.
Natural Science Curators	Approve natural science specimen acquisitions, excluding purchases, conditional gifts and acquisition by retention of unclaimed material	Acquisition cannot incur any costs and must not exceed 800 samples/lots.

If the cost of an acquisition is outside the limits of the Director’s delegations, or the item is identified as being in a high-risk category on the Provenance and Due Diligence Research checklist, the relevant acquisition proposal will be presented to the Director in the first instance for review and recommendation, then forwarded, together with the Director’s recommendation, to the Board of Trustees for assessment and approval.

3.6.1 Acquisitions Approval Procedures

Acquisitions approval procedures are as follows:

1. Each proposed acquisition must be the subject of an Acquisition Proposal, which is written by the Curator in a relevant discipline (“the Author”).
2. The Acquisition Proposal:
 - a) Outlines how the acquisition is consistent with the purpose and principles set out in this policy;
 - b) Describes the item as fully as possible – curators should consult Clause 5.4 of the Provenance and Due Diligence Policy to ascertain relevant information to be included;
 - c) Documents all provenance and due diligence research undertaken, providing a summary of research findings, as per the Provenance and Due Diligence Policy and Procedures;
 - d) Notes key points and findings of any TMAG consultation undertaken in relation to the item, as per the Provenance and Due Diligence Policy and Procedures;
 - e) Is signed by the author who thereby asserts that the information contained therein is accurate;
 - f) Is circulated to the Registrar and relevant Conservator/s to provide additional information and indicate support, or otherwise, for pursuing the acquisition.

3. The completed Acquisition Proposal is then presented for assessment and approval by the relevant delegated authority (see table above).
4. Approved Acquisition Proposals are marked as 'Approved' or 'Not Approved' and signed by the Assessor.
5. The Assessor's signature indicates the Assessor has arrived at a judgement, informed by the information presented and by their professional knowledge, on the outcome of that Proposal.
6. In the case of approved Proposals, the Assessor's signature denotes that the Proposal information is sufficient to indicate alignment with the TMAG Acquisition Policy and related TMAG Policies and Procedures.
7. In the case of Proposals that are not approved, the Assessor's signature will be accompanied by a note that indicates the reason/s why the Proposal was not approved.
8. The Proposal will be returned to the Author for digital filing. All Proposals, whether approved or not, must be documented and retained by TMAG, with the documentation to include:
 - a. All information originally included in the Proposal;
 - b. The identity of the Author and of the Assessor;
 - c. The outcome of the Proposal (approved or non-approved);
 - d. If the Proposal was not approved, the reason/s why it was not approved; and
 - e. The date on which the assessment decision was made.
9. In respect of acquisitions proposals that are exceed the Director's delegations:
 - a. Procedures at 3.6.1.1, 2 and 3 are followed;
 - b. The Director appends a brief Report to the Proposal in fulfilment of Clauses 3.6.1.4, 5, 6 and 7, excepting that the **Statement** of approval or non-approval (as described in 3.6.1.4) is replaced by a **Recommendation** of approval or non-approval;
 - c. The Proposal with its accompanying Director's Report and Recommendation is presented to the next meeting of the Board of Trustees, where it is assessed;
 - d. The Board of Trustees decide the outcome of the Proposal (approved or not approved). Their decision will take into account:
 - i. The information in the Proposal;
 - ii. The Director's appended Report and Recommendation; and
 - iii. The collective professional judgement of the members of the Board of Trustees.

All decisions of the Board of Trustees in relation to Acquisitions Proposals will be minuted. The Author will be informed of the Board's decision in relation to the Proposal as soon as the minutes of the meeting are approved.
10. On approval of the Acquisition Proposal, relevant transfer of title documentation, such as Deed of Gift or Purchase Agreement must be completed.

11. On finalisation of transfer of title and receipt of the material it should be accessioned and catalogued in accordance with the *TMAG Documentation Procedures*.

Section 4 – Transparency and Accountability

4.1 Publication of new acquisitions

The Director will ensure that a list of all acquisitions approved in the financial year is published in the TMAG's Annual Report.

Unless otherwise restricted in accordance with other TMAG policies, procedures or legal obligations, TMAG may make provenance information for new acquisitions publicly accessible on TMAG's website and on other websites that publish TMAG collection information such as *CollectionSearch* and *Atlas of Living Australia*.

4.2 Record Keeping

Full documentation of all acquisitions proposals will be maintained in accordance with procedures described at 3.6.1.8-9 of this Policy and in accordance with the *State Growth Information Management Policy (IM Policy)*.

The records that TMAG creates are State records and come under the jurisdiction of the *Archives Act 1983*. TMAG has both specific and implied requirements for record keeping under the terms of the Act.

4.3 Internal audit and review cycle

The Director will ensure that compliance with this policy is assessed as part of TMAG's audit program. The policy review process will be headed by the Registrar on a regular basis. Any proposed changes to the Policy will be presented to the Board of Trustees for approval and endorsement.

Section 5 - Responsibilities and Compliance

5.1 Responsibilities

5.1.1 Board of Trustees

The Board of Trustees is responsible for the care and development of the collections and for ensuring compliance with Board-approved collection policies and procedures.

5.1.2 Director

The Director is responsible for ensuring that employees under their management are aware of, have an understanding of, and are implementing the requirements of this policy.

The Director is responsible for any actions in this Policy that are noted as the responsibility of the Director. Such actions include decision making, approval of acquisitions within the limits of the Director's delegations, ensuring the publication of new acquisitions in the Annual Report, and other actions.

5.1.3 Employees

Employees are responsible for:

1. Understanding and implementing this policy and any procedures described therein;
2. Requesting assistance as required in the implementation of this policy; and escalating foreseeable issues to their manager;
3. Ensuring that all relevant documentation is completed and maintained in accordance with Section 3.6.1.6 of this Policy;
4. Notifying the Department of Primary Industry, Parks, Water and Environment (DPIPWE) when TMAG takes delivery of any wildlife specimens either living or dead of any species deemed to be protected as per s.57(2) of the Wildlife (General) Regulations 2010.

5.2 Compliance

All employees are required to comply with this policy.

Disciplinary action may apply where an employee fails to comply with this policy without reasonable cause.

5.2.1 Conflicts of Interest

All staff and Members of the Board of Trustees take reasonable steps to avoid, any potential, actual or perceived conflicts of interest in connection with their employment at TMAG.

If staff or Members of the Board of Trustees are aware of any potential, actual or perceived conflicts of interest in connection with their employment at TMAG, they must disclose this immediately in writing to the Director. The Director will assess the risks and take any steps necessary to mitigate that risk.

Should any conflict of interest regarding acquisitions develop between an individual and TMAG, the interests of TMAG must prevail.

To avoid potential, actual or perceived conflicts of interest, TMAG will not purchase items from:

1. TMAG staff;
2. Current members of the Board of Trustees; or
3. Immediate family members and close associates of staff or Members of the Board of Trustees, unless the item is professionally assessed to have extraordinary significance.

If an item is professionally assessed to have extraordinary significance, it may be proposed for acquisition as per the terms of Section 3.6.1 of this Policy, if and only if:

1. Risks arising from any potential, actual or perceived conflicts of interest are formally assessed; and
2. The conflicted person has been removed from any decision-making processes in relation to the acquisition proposal.

Section 6 – References

6.1 Internal Reference Material

This policy should be read in conjunction with the following TMAG documents:

- Biodiversity collecting policy
- TMAG Art and Decorative Arts Strategy
- Cultural Heritage Strategic Plan 10 Year
- FPAC TMAG strategy
- Consultation Policy
- Deaccession and Disposal Policy
- Deed of Gift
- Documentation Procedures
- Incoming Loan Policy and procedures/checklist
- Manual of Authorities
- Provenance and Due Diligence Research Policy
- Purchase Agreement
- State Growth Information Management Policy (IM Policy)
- Transfers from Government Agencies Procedure
- Unclaimed Material Procedure

6.2 External Reference Material

- *Aboriginal and Torres Strait Islander Heritage Protection Act 1984*
- American Association of Art Museum Directors, *Guidelines on the Acquisition of Archaeological Material and Ancient Art, 2013*
- *Archives Act 1983*
- Australia Council, *Protocols for Producing Indigenous Australian Visual Arts, 2010*
- Australian Government, Attorney General's Department, Ministry for the Arts
- Australian Best Practice Guide to Collecting Cultural Material, 2015
- Australian Government, Ministry for the Arts, *Cultural Gifts Program guide, 2013*
- *Commonwealth Repatriation Policy 2016*
- *Competition and Consumer Act 2010*
- *Convention on International Trade in Endangered Species of Wild Fauna and Flora*

- (CITES) – March 1973 (and as amended 1979 and 1983)
- *Convention on Biological Diversity (CBD) and the Nagoya Protocol (2010)*
 - *Environmental Protection and Biodiversity Conservation Act 1999*
 - *Historic Shipwrecks Act 1976*
 - *ICOM Code of Ethics for Museums, 2017*
 - *ICOM Code of Ethics for Natural History Museums*
 - *ICOM, International Observatory on Illicit Traffic in Cultural Goods*
 - *ICOM, Red Lists of cultural objects at risk (18 Lists as of 2021)*
 - *Meteorites Act 1973*
 - *Museums Australia Code of Ethics*
 - *Museums Australia, Continuing cultures, ongoing responsibilities, 2005*
 - *National Standards for Australian Museums and Galleries*
 - *Pacific Islands Museums Association, Code of Ethics for Pacific Museums and Cultural Centres, 2006*
 - *Protection of Moveable Cultural Heritage Act 1986*
 - *Protection of Movable Cultural Heritage Regulation 2018*
 - *Protection of cultural objects on loan: scheme guidelines, 2014*
 - *Significance 2.0; a guide to assessing significance of collections* Collections Council of Australia 2009
 - *Tasmanian Nature Conservation Act 2002*
 - *Tasmanian Whales Protection Act 1988*
 - *Tasmanian National Parks and Reserved Land Regulations 1999*
 - *UNESCO Convention on the Means of Prohibiting and Preventing the Illicit Import, Export and Transfer of Ownership of Cultural Property 1970 ('the Convention')*
 - *Unidroit, Convention on Stolen or Illegally Exported Cultural Objects, 1995*
 - *Wildlife (General) Regulations 2010*

Status and Details

Document Title	Acquisitions Policy
Document Category	Collection Management
Version	3.0
CM Reference	D20/40269
Date Released for Consultation	
Approved by	Board of Trustees
Date Approved (effective date)	8 June 2022
Review Date	June 2023
Responsible Officer / Team Head	Philippa Cox
Author	Name: Philippa Cox Position: Registrar
Enquiries Contact	Name: Philippa Cox