# Ontario MINISTRY OF TOURISM, CULTURE AND SPORT



# Standards for community museums in Ontario

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# Introduction

The Ontario Ministry of Tourism, Culture and Sport is pleased to introduce a revised edition of the Standards for Community Museums in Ontario.

The environment in which museums function is changing and the museum profession is growing and becoming more skilled and knowledgeable. Museum standards must continue to evolve as museums find new ways to serve their communities and fulfil their mandate.

The 10 revised standards for community museums represent the minimum requirements for the operation of a good community museum. Community museums need to meet the standards in order to qualify for funding under the Community Museum Operating Grant<sup>1</sup>.

The province has a fundamental commitment to the preservation, presentation and sustainability of the material culture of Ontario, through the community museums of the province. In achieving these standards, Ontario's museums will continue along the path to excellence and remain a resource to the communities they serve.

To help you meet the revised standards, the ministry will continue to provide advisory services, resource materials and relevant museological information.

#### Governance standard

As a community museum, you must be governed according to standards and be open and accountable to the public for your decisions.

#### Requirements

- a. governed by a publicly accountable body<sup>2</sup>.
- b. established by a written document(s) which include(s) descriptions of:

- authority for the museum
- museum's mission statement that
  - defines the museum's purpose
  - makes a commitment to the museum's role in the public trust
  - identifies who the museum serves
  - identifies what the museum will collect
  - identifies the impact it will have in its community
- c. how the museum will dissolve its assets and liabilities should it cease to operate
- 2. The museum's governing body must:
  - a. be established by a written document which outlines:
    - · its composition and structure including selection of members and terms of office
    - its obligation to ethical behaviour and the avoidance of conflict of interest as a body and as individuals
    - its obligation to meet municipal, provincial and federal legislative requirements that have an impact on its decisions or activities
    - its responsibilities and duties, including:
      - recruiting, supervising and evaluating the museum's curator or director (i.e. the museum's chief manager)
      - · formulating the museum's statement of purpose
      - formulating written policy governing operations and defining programs
      - securing funding necessary to carry out the museum's programs
      - preparing or approving an annual budget and monitoring it to ensure public accountability
      - · ensuring that the purposes for which the museum exists are being fulfilled
      - ensuring that the collection is being cared for under proper conditions
  - b. meet regularly and as often as necessary to conduct its business effectively
    - meetings must follow a written agenda and a written record must be kept of all discussions and decisions
- 3. The museum's operation and administration must:
  - a. meet municipal, provincial and federal legislative requirements that have a bearing on its operations and activities
- 4. The museum and its staff must:
  - a. demonstrate a commitment to ethical behaviour as an institution and as individuals.
- 5. The museum's operations and activities must be:
  - a. directed by short and long-term written plans (e.g. business plan, strategic plan, visioning plan or master plan) that are:
  - b. approved by the governing body
  - c. contain goals and objectives relevant to the museum's statement of purpose

# Finance standard

As a community museum, you must demonstrate fiscal responsibility.

#### Requirements

- 1. A community museum must:
  - a. demonstrate a commitment to ethical behaviour in the pursuit of funding
  - b. demonstrate a commitment to financial sustainability and stability
  - c. seek diverse sources of funding both public and private
  - d. make public an annual financial report
- 2. The museum's governing body must:
  - a. secure funding necessary for the operation and maintenance of the museum and its activities
    - b. secure funding for capital projects
    - c. approve the annual budget that allocates and controls financial resources related to the museum's operation and administration
    - d. review and approve the museum's budget in relation to the goals, objectives and priorities of the museum

# **Collections standard**

#### **Objective of the Collections Standard**

As a community museum, the artifacts you keep represent your community's heritage. To protect their value, you must maintain a well-organized, managed and documented collection.

Requirements

A community museum must:

- have a written collection development policy stating that it will:
   a. ensure that the scope of collection is consistent with the museum's statement of purpose
  - b. establish priorities for collection development
  - c. demonstrate a commitment to ethical behaviour in collection development (e.g. repatriation, human remains)
  - d. meet municipal, provincial and federal legislative requirements that have an impact on collecting activities (e.g. illicit materials, firearms, hazardous materials)
- 2. have a written collections management policy stating that it will:
  - a. ensure proper procedures and documentation for acquiring, using and deaccessioning artifacts in the collection
  - b. ensure proper procedures and documentation for incoming and outgoing loans
  - c. ensure proper procedures for the management of collections records
  - d. demonstrate a commitment to conservation standards in the labelling, care and handling of artifacts
  - e. distinguish between artifacts in a research (or study) collection and objects in an education (or hands-on) collection
  - f. meet municipal, provincial and federal legislative requirements that have an impact on collections management and documentation (e.g. acquisition and de-accessioning, tax receipts, firearms, hazardous materials)
- 3. assign the duties of a Collections Manager (or equivalent position) to an appropriately trained staff member and provides adequate time, workspace and funding for collections management activities
- 4. use an effective collection documentation system, which may be paper-based, electronic, or a combination and includes:
  - a. a standardized numbering system
  - b. an accession register
  - c. a master catalogue file
  - d. signed donor and loan forms
- 5. keep a periodically updated paper or electronic copy of the collection records off-site in a secure location
- 6. keep its collection records current

# **Exhibition standard**

#### **Objective of the Exhibition Standard**

As a community museum, your exhibits provide an important link between your community and its heritage.

In the planning and presentation of exhibitions, you must strive for accuracy of information, relevance to the community, effective communication, opportunities for learning and engagement, and the safe display of artifacts.

### Requirements

- 1. have a written exhibition policy stating that it will:
  - a. ensure that the themes and number of exhibits are consistent with the museum's statement of purpose and the needs and interests of the communities it serves
  - b. demonstrate a commitment to accuracy and fairness, inclusivity and respect in exhibit presentation
  - c. demonstrate a commitment to ethical behaviour in exhibit presentation
  - d. meet conservation standards in exhibit design, materials and use of artifacts
  - e. meet municipal, provincial and federal legislative requirements that have an impact on exhibit presentation (e.g. safety codes, copyright, disability legislation).
- 2. ensure its exhibits are consistent with the museum's exhibition policy
- 3. ensure it has an exhibition schedule comprising a mix of permanent and temporary exhibits
- ensure the relevance, accuracy and effective communication of each exhibit by:

   a. establishing clearly defined objectives and evaluating exhibits against their objectives
  - b. using appropriate expertise, including staff, volunteers, community groups, or consultants
  - c. carrying out sufficient research
- 5. ensure that all staff (including volunteers) involved in the planning, preparation and installation of exhibits have the necessary skills and training
- 6. ensure that exhibits are safe for visitors and staff by:
  - a. placing hazardous materials in display cases
    - b. adequately supporting, securing or providing barriers against heavy objects or moving parts that could cause injury
    - c. training staff in the safe operation of exhibits (e.g. machinery)
    - d. meeting legislated requirements in the handling and display of firearms

- ensure that exhibits are accessible and capable of being used and enjoyed by visitors of all ages and abilities (See the A.O.D.A. Wizard for your organization's specific requirements such as the Accessibility Standard for Customer Service, and dates for implementation)
- 8. ensure that exhibits effectively promote learning and enjoyment through:
  - a. providing a variety of interpretation methods to meet a range of visitor needs
  - b. regularly replacing artifacts in permanent exhibits with other examples from storage, to refresh the exhibits for the community's enjoyment as well as for conservation purposes
- 9. ensure a portion of the museum's budget is allocated annually for:
  - exhibit development
  - design
  - construction
  - maintenance
  - · evaluation expenses
- 10. ensure that exhibit preparation activities that are harmful to artifacts are carried out in a workshop that is isolated from collection areas (i.e. display and storage).
  - activities would include those that produce dust, excessive heat or vibrations, and those that involve the use of aerosols and solvents (e.g. paints and varnishes)

## Interpretation and education standard

As a community museum, your interpretation and education programs allow the community to interact more closely with your collections and information and reach audiences of all ages, interests and abilities.

# Requirements

A community museum must:

- 1. have a written interpretation and education policy stating that it will:
  - a. ensure that the theme, content and format of interpretation and education programs are -
    - consistent with the museum's statement of purpose
    - · meet the needs and interests of the communities it serves
    - b. establish priorities for the development of interpretation and education programs
    - c. ensure that responsibility for interpretation and education programming is given to properly trained staff
    - d. demonstrate a commitment to accuracy and fairness, inclusivity and respect in interpretation and education programs
    - e. demonstrate a commitment to ethical behaviour in interpretation and education programs
    - f. demonstrate a commitment to meet conservation standards in use of artifacts
    - g. meet municipal, provincial and federal legislative requirements that have an impact on interpretation and education programs (e.g. copyright, disability legislation)
- 2. have an interpretation and education program consisting of a mix of school programs, public programs, and special events; all interpretation and education programs must:
  - a. be consistent with the museum's statement of purpose and meet the needs and interests of the communities it serves
  - b. promote learning and enjoyment
- 3. ensure the relevance, accuracy and effective communication of its interpretation and education programs (see above for A.O.D.A. requirements) by:
  - a. establishing clearly defined and measurable learning objectives and outcomes, and undertaking a process of program evaluation
  - b. using appropriate expertise including staff, volunteers, community groups, or consultants
    c. carrying out research
- 4. ensure all staff involved in the development and delivery of interpretation and education programs, have the appropriate skills and training
- 5. provide sufficient space and a safe and secure environment for interpretation and education programs
- 6. allocate every year a portion of the museum's budget for interpretation and education program expenses

# **Research standard**

As a community museum, research is an ongoing activity and is reflected by your well-researched exhibits, interpretation, publications and educational programming, As well as helping staff researchers, you also have a responsibility to assist outside researchers.

#### Requirements

- 1. have a written research policy stating that it will:
  - a. demonstrate a commitment to the pursuit of research by staff and outside researchers

- b. ensure that the scope of research is consistent with the museum's statement of purpose
- c. establish priorities for research activities
- d. demonstrate a commitment to accuracy and objectivity in the results of research
- e. demonstrate a commitment to ethical behaviour in research (e.g. confidentiality of records, ownership of information)
- f. meet municipal, provincial and federal legislative requirements that have an impact on research activities and products (e.g. copyright legislation)
- 2. have a research program that is consistent with its statement of purpose, and reflects the needs of its communities, site, collections and public programs.
- 3. schedule time for staff to carry out the museum's research program
- 4. allocate a portion of its budget every year for research expenses, such as reference material, photocopying and staff travel
- 5. provide a clean, well-lit, separate space for staff and external researchers to carry out research
- 6. ensure that researchers who have access to the collection have training in handling artifacts

#### **Conservation standard**

As a community museum, you have a responsibility to protect and preserve the collection entrusted to your care, so that future generations have the opportunity to enjoy and learn from it.

You will demonstrate the stewardship of your collection by following procedures that ensure its long-term preservation.

#### Requirements

- 1. ave a written conservation policy that sets out how it will:
  - a. demonstrate its understanding of the distinction between preventive care and conservation treatment
  - b. demonstrate its commitment to the preventive conservation of the collection
  - c. establish priorities for making decisions regarding conservation treatment
  - d. ensure that responsibility for the care of its collections is delegated to appropriately trained staff
  - e. demonstrate a commitment to consult with, and be guided by, the advice of qualified experts in conservation
  - f. demonstrate a commitment to ethical behaviour in the care of collections
  - g. meet municipal, provincial and federal legislative requirements that have an impact on the conservation of collections
- demonstrate a commitment to protect the collection through proper care and handling by:
   a. implementing a program to instruct staff how to safely handle artifacts
  - ensuring that artifacts are durable enough to withstand their proposed use e.g., displays, interpretation, loans, hands-on activities
  - c. implementing safe packing, unpacking and transportation procedures
- provide one or more exclusive spaces for the storage of the collection. These areas will be:
   a. used for collection storage only
  - b. large enough to store existing artifacts without crowding, and to accommodate projected future acquisitions
  - c. kept clean through the implementation of a regular housekeeping schedule performed by staff or volunteers with the necessary training
  - d. kept dark, except when staff are present
  - e. restricted to access only by designated appropriate staff (e.g., curator or registrar)
  - f. equipped with suitable and safe shelves, cabinets and artifact supports
- 4. maintain the safety and preservation of artifacts on exhibit by:
  - ensuring that cases and floor spaces are large enough to hold artifacts without crowding or distortion
    - b. ensuring that artifacts on display are adequately supported with safe materials
    - c. using display materials (such as case materials, backgrounds, adhesives, labels) that are not harmful to artifacts
    - d. ensuring that exhibits are kept clean and maintained by staff trained in the handling of artifacts
    - e. ensuring that light-sensitive artifacts are displayed only for short periods of time
    - f. implementing a program of regular inspections of artifacts on exhibit to check for losses and damage
    - g. updating collections records to reflect changes in location e.g., storage to display
- 5. ensure the security of the collection by:
  - a. protecting artifacts from water damage
  - b. protecting artifacts from theft and vandalism, including restricting access to artifacts
  - c. establishing written standard procedures to deal with emergencies and disasters, and training of all staff in these procedures
- 6. provide an appropriate environment for artifacts in all storage and exhibit areas by:

- a. reducing visible light levels to accepted standards<sup>3</sup>
- b. removing as much ultraviolet radiation as possible
- c. maintaining relative humidity and temperature levels within an appropriate range for museum artifacts<sup>4</sup>
- d. reducing dust and pollution through a combination of physical plant (e.g. use of vestibule, appropriate air filtration) and preventive procedures (e.g. use of door mats, no smoking rules)
- e. implementing a regular cleaning and maintenance schedule of the museum and storage spaces performed by staff or volunteers with the necessary training
- f. implementing preventive pest management procedures, including regular inspections for pests in the museum and inspection of all incoming collection and non-collection material
- g. implementing a program of regular checking and recording of environmental conditions, with follow up procedures to correct deficiencies
- 7. ensure that conservation treatment procedures will not damage artifacts and are carried out in accordance with professional standards of practice by:
  - a. ensuring that individuals treating artifacts have an appropriate level of training in conservationb. ensuring that all conservation treatments are properly documented and the documentation is retained on file
  - c. ensuring that conservation treatment carried out in the museum takes place in a separate space that is appropriately equipped and ventilated according to health and safety standards

#### Physical plant standard

As a community museum, your buildings and grounds must provide a safe and functional environment for visitors, staff, the collection and associated activities.

This objective must be balanced with the need to preserve the integrity of heritage buildings as artifacts themselves, as well as archaeological resources present on the property.

#### Requirements

A community museum must:

- ensure the design and layout of its building(s) and grounds:
   a. accommodate the physical and functional needs of its users, staff, collections and activities
  - b. are appropriate to the museum's statement of purpose, and to its community role and image
- 2. meet its obligation to federal, provincial and municipal requirements that apply to physical safety of staff, visitors and property
- 3. ensure that each of its buildings meets environmental norms appropriate to its functions
- 4. ensures the security of its users, staff, collections and information by developing and regularly updating an emergency preparedness plan or equivalent that:
  - a. identifies potential threats e.g., personal threat, fire, water or vandalism
  - b. takes steps to minimize the level of individual risks e.g., by installing sufficient security lighting
  - c. includes written procedures to respond to threats, emergencies and disasters
  - d. includes training staff and volunteers to implement emergency and disaster response procedures
  - e. establishes a system of periodic testing and assessment of the effectiveness of emergency procedures
  - f. ensures that any preventive or security systems installed are assessed for their potential impact on collections and the museum's character and functions
- 5. have a written maintenance manual that sets out how it will:
  - a. conduct regularly scheduled inspections and maintenance of building(s) and grounds
  - b. set priorities and schedules for ongoing repairs and capital upgrades
  - c. ensure that health and safety codes are met in the maintenance and repair of the physical plant
  - d. conduct daily, weekly and monthly housekeeping routines
- strive to be environmentally responsible in its use of energy and materials, including the handling, storage and disposal of hazardous materials
- 7. maintain the historical integrity of its resources should it be located in a heritage building, on a historic site, or on grounds containing an archaeological site and maintain the historical integrity of these resources in its use, maintenance, repair and modification following conservation standards and procedures
- ensure that if buildings are open on a seasonal basis they are monitored for temperature and humidity, and measures are taken to decrease the risk of environmental damage during the offseason

# **Community standard**

A community's heritage is part of its identity. As a steward of the community's heritage, the museum is actively engaged in the community and responsive to its needs. The museum is accessible and relevant, and draws support from its community.

Requirements

A community museum must:

- have a written policy that defines its relationship with the community, and that will:

   a. ensure that it performs its role as a steward of the collection
  - b. ensure that it provides services and programs consistent with its statement of purpose that meet the needs and interests of the community
  - c. endeavour to allow all sectors of the community to participate in the museum's decisions, goals and directions that may affect them or reflect on them
  - d. engage members of the community in museum activities
  - e. identify and pursue appropriate community partnerships
  - f. endeavour to provide equality of access to information about the museum's collections, services and programs through adequate promotion
  - g. endeavour to provide equal access to all members of the community, both physically and intellectually, to the museum's collections, information, services and programs, including through electronic means e.g., a website or social media.
- 2. have regular, posted, and advertised hours, during which it is open to the public, and which meet the needs of the community
  - a museum not open for long periods of time due to staffing considerations or weather must assess the needs of the community and make its services available by appointment and/or outreach activities
- 3. have a volunteer program to encourage community participation in its activities, which should include:
  - a. identification and development of volunteer opportunities
  - b. procedures for recruitment of volunteers
  - c. matching the needs and interests of volunteers to those of the museum
  - d. provision of appropriate training and supervision for volunteers
  - e. provision of a safe and secure working environment for volunteers
  - f. volunteer evaluation
  - g. public and private recognition of volunteers' contributions

#### Human resources standard

As a community museum, your ability to fulfil your museum's purpose depends largely on the professionalism and capabilities of your <u>staff<sup>5</sup></u>.

You are better able to meet your mandate and carry out activities if you recruit qualified staff and provide ongoing training opportunities.

As an employer, you are concerned with the safety, security, wellbeing and continued motivation of the people who work with you.

#### Requirements

- 1. have a written human resources management policy stating that it will:
  - a. ensure that staff responsible for administering the museum and its collections have appropriate professional training
  - b. ensure that all museum activities are carried out by appropriately trained staff
  - c. ensure that each staff member has a written job description (see Glossary)
  - d. ensure that human resource management, including recruitment, performance assessment, and termination is conducted in an ethical manner and is consistent with accepted practice and applicable legislation
  - e. ensure that staff are provided with information on health and safety hazards in the workplace and are trained in their management or mitigation
  - f. ensure that at least one person on staff has current First Aid training
  - g. endeavour to provide equal access to the workplace by staff of all abilities
  - h. ensure that staff are familiar with and adhere to a museological code of ethics
  - i. meet municipal, provincial and federal legislative requirements relating to people in the workplace
- 2. have a written staff training policy that sets out how it will:
  - a. help staff to maintain or upgrade their skills
  - b. set priorities for staff training
  - c. determine appropriate levels of support e.g., financial, time, for individual staff training
  - d. ensure the development of an ongoing in-house training program for staff and volunteers; ensure its delivered by qualified people
  - e. provide staff with access to professional development opportunities and interchange with museum colleagues, including communication with other museums in the region
  - f. ensure the development and regular delivery of an orientation program for members of the

governing body

- 3. Budget a portion of its allocation every year for:
  - a. development, delivery and assessment of an in-house training program staff
  - b. access to professional development e.g., seminars, workshops, conferences
  - c. purchase and maintenance of a collection of current reference material

#### Glossary

The following glossary refers to terms used by the Ministry of Culture in the document *Standards for Community Museums in Ontario* and is intended only to assist readers of this document. Definitions and descriptions from other sources have been included to enhance the reader's understanding of these terms.

# A publicly accountable body

The organization identifies its stakeholders and ensures there is a strategy for regular and effective communication and consultation with them about the organization's achievements and work. *Imagine Canada Standards Program Handbook* 

"Accountability begins with compliance with laws and regulations. Going beyond legal requirements, many museums voluntarily choose to adhere to ethical codes and accountability standards to ensure good stewardship of assets held in the public trust and to maintain public confidence. Standards are consensus documents or written statements of generally accepted principles. Standards provide a common language to enable museums to communicate about their performance and increase accountability." *American Alliance of Museums Reference Guide Ethics, Standards and Best Practices for Museums* 

# The authority for the museum

In the case of municipal museums, the establishment of the museum in the form of constating documents such as by-laws or council motions. In the case of not-for-profit corporations, the letters patent for the museum and the proof of incorporation. In all cases, the museum's legal ownership of the collection must be established in writing.

"Each museum should have a written constitution or other document setting out clearly its legal status and permanent, non-profit nature" *ICOM Code of Professional Ethics* 

"Every museum requires a written mandate, which may take the form of a constitution with by-laws, an act, a municipal charter, etc.; this public document establishes its legal, non-profit status and purpose, and its objectives." *CMA Ethics Guidelines* 

#### The museum's governing body

An appointed or elected body that is solely responsible for the operation of the museum, such as a Board of Directors, a Management Committee, or an Advisory Committee. This body cannot have a mandate that includes other municipal entities (e.g. libraries, tourist offices, or recreation centres).

"The persons or organisations defined in the enabling legislation of the museum as responsible for its continuance, strategic development and funding" *ICOM Code of Professional Ethics* 

"The governing body of a museum may be an elected or appointed Board of Trustees or Directors, or a Management or Advisory Board or Committee of municipal officials. Whatever its formation, it is the legal entity that is accountable to the public and to the museum community for the policy, financing and administration of the museum." *CMA Ethics Guidelines* 

"The curator is the chief executive officer of the museum. This person might have any one of a number of titles including Director, Museum Manager, or some combination of terms. The Regulation governing grants states that a museum must have an appointed curator, defined as a person whose full-time service is devoted to the administration of a museum. A good curator should be able to: conduct research on the collections for documentation, exhibition and program development; ensure that the collection represents the museum's mission statement, fulfill requirements for keeping the collection well-preserved." *." OMA Recruiting and Hiring Museum Curators and Directors: A Human Resource Tool.* OMA: July 2003.

#### **Ethical behaviour**

A commonly accepted standard of behaviour for board members, staff and volunteers, outlined in publications such as the Canadian Museums Association's *CMA Ethics Guidelines* and the International Council of Museum's *ICOM Code of Professional Ethics*.

"Ethics are based upon the underlying values of honesty, fairness, respect, excellence and accountability which the larger community applies to the rational evaluation of moral issues. Since the application of such values change over time, museum ethics must reflect an ongoing dialogue between the museum community and the society it serves." *CMA Ethics Guidelines* 

#### Community

The community served by the museum. This can be a community distinguished by geographic boundaries (e.g. Lambton County), by common interest (e.g. Museum of Textiles), or by ethnicity (e.g. Ukrainian Museum of Canada). A museum may also serve a number of different communities (e.g. special interest and local community).

Appropriate research space

A designated space where staff and outside researchers may sit at a desk or table to consult reference books, archival material, and other documents. The space should be neither in the exhibit area - where it might interfere with public enjoyment of displays - nor in collection storage. The space should be well lit, and large enough to accommodate one or two researchers and their papers.

#### References

Alberta Museums Association Standard Practices Handbook for Museums, 3<sup>rd</sup> edition: 2014. *OMA Recruiting and Hiring Museum Curators and Directors: A Human Resource Tool.* Ontario Museum Association: July 2003

Canadian Museums Association. CMA Ethical Guidelines, Ottawa: 2006.

Canadian Museums Association Roles and Responsibilities of Museum Boards and Trustees  ${\sf CAMDO\ 2004}$ 

International Council of Museums. *ICOM Code of Professional Ethics*, Paris: 2013 (revised 2004). Imagine Canada Standards Program Handbook 2012 (revised October 2014)

American Alliance of Museums Reference Guide Ethics, Standards and Best Practices for Museums 2013

#### End notes

- While the principal goal of the standards is to serve museums as a guide to good practice, the Standards for Community Museums in Ontario are also referenced in Regulation 877 - Grants for Museums, the provincial regulation that governs the allocation of operating grants to Ontario's community museums. Eligibility for these operating grants is contingent on museums meeting both the requirements in the regulation as well as the standards. <u>return</u>
- 2. Municipal museums may be governed by a committee or board of management that advises council. return
- 3. Acceptable light levels for artifacts are 50 lux for highly light sensitive materials (e.g. most dyed textiles), 150 lux for moderately light sensitive materials (e.g. most varnished paintings), and 300 lux for materials that are not light sensitive (e.g. stone and ceramics). A maximum of 75 Watts/lumen of ultraviolet light is recommended for all but the last category. return
- 4. An acceptable range is normally 40% to 60%. This condition applies to all buildings physically capable of maintaining these standards and to all additions to existing buildings or sites. Some buildings, because of structural or historical considerations, may require that this range be adjusted. Such adjustments may be based on individual assessments carried out in consultation with Ministry or technical staff. return
- 5. In this context, "staff" includes both paid and unpaid staff. return

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