

## **POLICY: Safe Visiting Policy During COVID-19 Pandemic**

### **BACKGROUND:**

On March 15, 2020, The Brenda Strafford Foundation (BSF) implemented a Visitation Ban to protect our senior residents living in continuing care in response to the COVID-19 global pandemic and its emergence in Calgary. A Visitation Ban in continuing care centres was later implemented as mandatory by Order of Alberta's Chief Medical Officer of Health (CMOH) on April 7, 2020.

The Foundation welcomes the gradual reintroduction of families and visitors returning into continuing care sites as an essential component of well-being and quality of life for residents – in a safe and controlled manner.

Pursuant to CMOH Order 29-2020 dated July 17, 2020, the CMOH has determined that it is desirable to allow further visitation to take place within continuing care and other healthcare facilities. Due to confirmation that COVID -19 continues to present risk to the Alberta population, the CMOH also acknowledges that certain steps are necessary to suppress COVID-19 in those infected, to protect those who have already been exposed to COVID-19, to break the chain of transmission and prevent the spread of COVID-19, and to remove the source of infection. BSF is bound by the CMOH Order and will comply by implementing practices expected of operators of continuing care facilities. Visitation will be by way of a 'Safe Access' approach with consideration of the resident's needs and preferences, and assessment of both the site's and residents' risk.

### **PURPOSE:**

The BSF Safe Visiting Policy during COVID-19 Pandemic enables designated family/support persons to attend to residents within the site with the intent to protect the health and safety of residents and staff, while ensuring safe and meaningful connection for residents with persons that support them. Access and support from designated persons (other than staff) is supported as important to maintaining the resident's mental and physical health while still retaining necessary safety precautions. Visitation also helps support family care givers and provides vital social interaction for residents.

### **GUIDING PRINCIPLES:**

- **Safety of self:** All individuals have a duty to minimize risk of infection to themselves by following all public health guidelines and required BSF policies and procedures.
- **Safety of others:** All individuals have a duty to minimize risk of transmission by following all public health guidelines and required BSF policies and procedures.
- **Responsive:** Recognition that site characteristics, risks and risk tolerance, and resident circumstances can change.
- **Risk Informed:** Perceived or actual risk factors are recognized and considered alongside the needs and preferences of residents (at an individual and collective level)

### **DEFINITIONS AND DESCRIPTIONS:**

#### **Designated Family/Support Person**

- Up to two (2) family members or support persons (other than staff) to be designated per resident, to ensure each resident has the level of support they desire and/or require.

- These persons may be a family member, friend, companion (privately paid or volunteer), support worker (privately paid or volunteer), power of attorney/trustee, agent, legal guardian, or any other person identified by the resident or alternate decision maker.
- These persons cannot be under 18 years of age. In rare circumstances, and if the most suitable individual is younger, individuals 16 years of age or older may be supported to be a designated family/support person.
- A resident or their designated family/support persons may identify a temporary replacement designated family/support person if a designated family/support person is unable to perform their role for a period of time (e.g. self-isolation, out of town, or otherwise unable).
- It is possible for multiple residents to have the same designated family support persons.

### **Extenuating Circumstances Visitors**

- Other visitors that are not designated family/support persons who are permitted to visit indoors under extenuating circumstances.
- Requests for visitors in extenuating circumstances at BSF sites must be reviewed and approved by the site Administrator.
- Visitors in extenuating circumstances must be permitted entry to sites in the following situations:
  - End of life
    - In this context, end of life refers to the last four to six weeks of life for a resident.
    - Note that a physician's note is not required for the determination of end of life.
  - Significant change in resident health status
    - This includes any instance of sudden change in physical/mental/cognitive/spiritual health status, extreme loneliness or depression, or other situation where resident health has been or is suddenly compromised.
  - Pressing circumstances
    - This includes any life event where access to someone other than the designated family/support persons might be necessary (e.g., financial or legal matters, family crisis, etc.).

### **Social Visitors**

- Social visitors, where permitted, are visitors that are not designated family/support persons, nor are visiting a resident under extenuating circumstances.
- Social visitors include persons of all ages, including minors.
- Social visitors can visit residents during pre-scheduled outdoor visits; the visit can include up to four (4) visitors to make a maximum group of five (5) people including the resident.
- BSF does not permit social visitors indoors at this time.

### **Risk Tolerance**

- This refers to the ability of the site/organization, as an entity, to accept increased potential exposure to COVID-19 to inform situations where more visitation may be desired or restricted access may be necessary.
- Risk tolerance is fluid and will depend on multiple factors.

- Risk factors are not mutually exclusive, it is the consideration of the combination of them that will inform the site's risk tolerance (i.e. in a site with minimal space, where residents are active/healthy, assess their own risk tolerance as high, social visits in designated indoor spaces or resident rooms may be permitted).
- Risk tolerance will be identified by the site based on input from residents, families and staff. Risk tolerance will vary between sites for many reasons including site designation and perception of risk tolerance by each resident or legal representative.

**KEYNOTE:**

- Site capacity for safe visits depends on the risk tolerance of the site/organization and BSF's organizational policy will reflect the risk tolerance of The Foundation.
- Temporary limitations on designated family/support persons or visitors will still occur in situations where the threat of COVID-19 is imminent.
- All restrictions will be determined in collaboration with residents and families in consultation with the BSF Interdisciplinary Senior Management Team including the Administrator, Medical Director, Chief Operating Officer and Chief Executive Officer and/or the Alberta Health Services (AHS) Calgary Zone Medical Officer of Health (MOH).
- All persons entering BSF sites must:
  - Understand the risk of COVID-19 to self and others
  - Follow all BSF policies (including Safe Visitation Guidelines) and public health measures
  - Remain vigilant in protecting self and others on and off BSF sites
- All designated family/support persons and visitors must understand their risk of unknown exposure to COVID-19 (based on their behavior in the past 14 days) prior to entering a site and modify their behavior accordingly.

**VISITATION AND SAFETY PRECAUTIONS AND BSF PARAMETERS:**

- Up to two (2) designated family/support persons are permitted per resident (both may visit at one time).
- Other visitors in extenuating circumstances are to be approved by the site Administrator and will be reviewed on a case by case basis. Extenuating circumstances are expected to be time limited for exceptional circumstances. Specific parameters will be determined on a case-by-case basis.
- Location of inside visits will vary for each BSF site to include and be limited to: resident rooms for residents in private rooms, and/or designated inside visiting space for residents in a semi-private room.
- Location of outdoor social visits will be in designated outdoor areas with a maximum of 4 visitors (including social visitors and/or designated family/support persons), plus the resident, for a total maximum of 5 people. A lower number of visitors may be necessary if the appropriate physical distancing cannot be maintained.
- When conducting an outdoor social visit in groups (of up to 4 visitors), it is the responsibility of the visitors to follow public health recommendations and ensure their group is comprised of people within their household or cohort.

- When BSF restricts or denies visitor access to a resident, the Administrator shall provide the rational and reasoning for the restriction or denial in writing to the designated family/support person(s) or visitor(s) together with the provisions to appeal.
- Restricted access by the operator will automatically apply when a designated family/support person or visitor has had exposure to a known COVID-19 infection or outbreak (i.e. individual works at or has visited a known outbreak site, or lives with/has close contact with someone else who works at or has visited a known outbreak site).
- All designated family/support persons and visitors (in extenuating circumstances) must wash hands often with soap and water for at least 20 seconds or use an alcohol-based hand sanitizer (greater than 60% alcohol content) before, during as appropriate, and after all visits.

### **RESPONSIBILITY:**

All residents, designated family/support persons, extenuating circumstances visitors, social visitors, staff and operations are responsible for following this policy.

### **PROCEDURES:**

#### **Outdoor Visits**

- Every visit must be prearranged with the site staff by booking through the established outdoor visit processes at the site.
- On-site screening is not required when outdoor visits maintain physical distancing. Every visitor will be asked to undergo a self-screening assessment to be provided at the time of booking. It will be the responsibility of the visitor to let the site know if they do not pass the self-screening assessment.
- Visitors must maintain physical distancing (2 metres) from the resident, and from other visitor groups (if site capacity permits more than one outdoor visit taking place simultaneously). Close contact and physical touch is not permitted at outdoor visits.
- BSF recommends continuous masking for visitors at outdoor visits. Although when physical distancing is maintained, continuous use of mask is not required for outdoor visits.
- Staff will be supervising outdoor visits at all times to ensure compliance with requirements.
- A designated family/support person is not required to be present for the outdoor visit.
- Social visitors, other than the designated family/support persons, will be asked to remain outdoors at all times (i.e. entry to the site will not be permitted).

#### **Indoor Visits with Designated Family/Support Person**

- Every visit must be prearranged with the facility staff through the booking procedures established at the site.
  - It is recommended that designated family/support persons establish a standing schedule (a schedule that is consistent week after week) based on resident needs and preferences to ensure operators expect their presence.
  - If no standing schedule is pre-arranged, or a visit is desired outside of the agreed standing schedule, the designated family/support persons must contact the site to request a visit with no less than 24 hours, but ideally at least 48 hours notice.

- Visiting hours are between 10:00 a.m. and 8:00 p.m. This time is established due to busy routines and high traffic at the site's screening stations during shift change. Designated family/support persons are also requested to avoid entering the site between 2:45-3:15 pm during afternoon shift change.
- Staff entering the site will have priority for screening.
- In the case that the resident is their own agent, the resident will determine their 2 designated family/support persons. In the case that the resident is not their own agent, the alternate decision maker will be responsible for determining the designated family/support individuals. Designated family/support persons must be appointed 48 hours prior to commencing the first resident indoor visit. Any changes to the designated family/support persons must be communicated at least 48 hours in advance to the Manor.
- Staff must record the details of the visit including name, date, time and screening information.
- All designated family/support persons should be prepared to show photo identification for verification upon reporting for screening.
- Staff will conduct a health assessment including temperature check at the screening station upon entry to the site. Staff must confirm the visitor does not have a temperature over 37.8 degrees C or any illness identified in the Designated Family/Support Person and Visitor Screening Questionnaire.
- Designated family/support person must satisfactorily answer and pass the screening questionnaire; if screen is not passed for the mandatory questions, entering the site shall be declined. If the screen is not passed for BSF risk-based questions, a risk assessment will be completed by the Administrator or designate prior to entry to the site.
- Designated family/support persons will be provided a copy and an explanation of the Safe Visiting Practice Guidelines. A form acknowledging the Safe Visiting Practice Guidelines, roles and responsibilities must be completed upon the first visit. Education will be provided by staff to support understanding and compliance with these Safe Visiting Practice Guidelines.
- Staff will provide any necessary Personal Protective Equipment (PPE) for each visitor including masks with instructions on usage.
- Continuous masking is mandatory inside the site. If physical distancing is maintained while in the resident's private room, masks can be taken off when inside the private room only. Masks must be worn if physical distancing is not maintained; if a staff member enters the resident's room; when moving between areas of the site; or when visiting in a designated indoor area.
- Designated family/support persons are required to check themselves for symptoms throughout visit; if symptoms occur the designated family/support persons must inform a staff member immediately and leave the facility.
- The designated family/support persons must notify the operator of any symptoms that arise within 14 days of visiting with a resident.
- In the event of symptoms, designated family/support persons are encouraged to complete the AHS online self-assessment to determine the need for a COVID-19 test.
- All designated family/support persons and visitors must understand that the risk of transmission of COVID-19 increases with close proximity. If they wish to include physical touch, designated family/support persons must ensure that they are continuously wearing

their mask, perform hand hygiene before and after direct physical contact with the resident, and understand that if they have self-determined to be at **high risk of unknown exposure to COVID-19, it is not recommended to physically touch a resident** (see 'Risk of Unknown Exposure Assessment Guidance' in Safe Visiting Practice Guidelines).

- Visits with residents with sensory deficiencies or cognitive impairment for which PPE use is creating a significant barrier shall be discussed with staff who may consider adaptations of facial PPE. Adaptions must be approved by the site Administrator and Medical Director, or AHS Zone Medical Officers of Health on a case-by-case basis.
- Visitation must occur inside the site in one of the following designated areas:
  - Inside a private resident room
  - Inside a shared semi-private resident room only when both physical distancing from the other resident can be maintained, and when consent from the other resident is obtained
  - In a designated indoor visiting space for those that share a semi-private room, when physical distancing from the other resident cannot be maintained, and/or consent from the other resident is not obtained.
  - Outdoors in on-site premises or Community Walks
- When visiting in a designated indoor visiting space is required:
  - Signage in the building will identify designated visiting areas and requirements
  - Continuous masking and hand hygiene will apply
  - Safe physical touch between the resident and their designated family/support persons is permitted
  - Physical distancing between other residents and their designated family/support persons is required
  - The number of persons permitted at one time will be limited based on the size of the area, and all visits must be scheduled with the site (may be a standing schedule), in order to adhere to capacity of the space to ensure physical distancing between other residents and their designated family/support persons
- Designated family/support persons pushing a wheelchair are required to perform hand hygiene and sanitize the handles before and after use.
- Designated family/support persons must only visit with the resident(s) they are supporting.

### **Access for Visitors in Extenuating Circumstances**

- Visitors in extenuating circumstances are defined as:
  - End of life (last 4-6 weeks, except in the case of hospice)
  - Change in health status (due to medical/social/spiritual crisis)
  - Pressing circumstances (including financial or legal matters, family crisis)
- All visits must be approved and coordinated by the site Administrator to determine the appropriate parameters and conditions for the visit, based on the individual extenuating circumstances on a case-by-case basis.
- For end of life, three people at a time are permitted unless all people are from the same household in which there is no maximum.
- Overnight stays can be coordinated with the sites and will be accommodated where possible for end of life/palliative care, to be approved by the Administrator on a case-by-case basis.

### **Visitation Resident to Resident**

- It is recommended that resident to resident visits take place on the neighborhood which they live, with other residents from the same neighborhood.
- Resident to resident visits are only permitted in common areas.

### **Community Walks**

- Residents who are not required to isolate may go on Community Walks that go beyond the property with the designated family/support person(s) only.
  - Residents who are able to go out on a Community Walk independently, unaccompanied by a designated family/support person, will be enabled to do so in coordination with the care team based on a risk assessment.
  - Outdoor Visits with social visitors must remain on-site in the designated Outdoor Visit area and are not permitted to go on Community Walks.
- Community Walks may be initiated as desired by the resident, or the designated family/support person as part of their scheduled visitation privileges, and do not require Administrator approval nor completion of a waiver.
- When on a Community Walk, residents and designated family/support persons must not meet-up or visit with family members or others while offsite, are required to remain outdoors and are not permitted to visit or enter any other facility or establishment (i.e. restaurant, café or store), nor go on a car ride. (Refer to guidelines for Offsite Outings).
- The designated family/support person must remain continuously masked throughout the Community Walk due to the close proximity to the resident and must practice all Safe Physical Touch guidelines.
- The resident and designated family/support person must sign out and in upon exit and re-entry to the site.
- Resident's must wash their hands or use sanitizer immediately upon return to the facility and will be subject to Health Assessment Screening upon re-entry. Resident's that fail the Health Assessment Screening will be subject to quarantine or isolation precautions.

### **Offsite Outings and Extended Stays**

- Residents who are not required to isolate are still encouraged to stay on site property, except in the case of necessity (i.e. medically-necessary appointment, or essential financial or legal matters that are required to be tended to in person).
- It is recommended that all medical or other services that can be facilitated virtually (i.e. online or by telephone) should be done virtually, whenever possible.
- Medically-necessary appointments should be pre-arranged in consultation with the care team (professional nurse and/or physician) and other essential appointments (i.e. financial or legal matters) should be pre-arranged in consultation with the appropriate site staff (i.e. Program Manager or Social Worker).
- Outings should only be facilitated and accompanied by the designated family/support person. However, in the case of medically-necessary or essential appointments, if a designated family/support person is unable to transport or accompany a resident to a medically-necessary or essential appointment, transport may be provided by an alternate named driver upon approval by the Administrator. (Administrator approval is not required

for appointments and outings accompanied by the designated family/support person, or when a resident is able to go out independently unaccompanied by a designated family/support person).

- It is recommended that residents do not participate in unnecessary outings (i.e. outings that are social/recreational in nature) however, they may choose to do so based on their individual risk tolerance.
  - Social outings must only be facilitated and accompanied by the designated family/support person(s).
  - Residents who are able to go on social outings independently, unaccompanied by a designated family/support person, will be enabled to do so in coordination with the care team based on a risk assessment.
- Residents will be supported in leaving the site for recreational/social extended stays over 24 hours offsite (e.g. visits to family cabin, weekends at family house, etc.) when desired. A managed risk agreement will apply.
  - Extended stays offsite must only be facilitated and accompanied by the designated family/support person(s).
  - Residents who are able to go on extended stays offsite independently, unaccompanied by a designated family/support person, will be enabled to do so in coordination with the care team based on risk assessment.
- Completion of a one-time 'Off-Premise Outing Waiver' is required to be signed by the resident (if own decision-maker), and/or any designated family/support person or individual responsible for transporting or accompanying a resident on an outing. The one-time waiver is required to be completed by each individual family/support person or alternate named driver who is responsible for transporting or accompanying a resident offsite, the first time they transport/accompany the resident offsite.
- Should a resident choose to participate in an offsite outing or extended stay for reasons other than necessity, it is the resident's and designated family/support person's responsibility to:
  - Maintain physical distancing
  - Wear a mask at all times and ask anyone you may be with to also wear a mask
  - Maintain good hand hygiene
  - Ensure safe transportation
  - Follow safe physical touch guidelines
  - Understand the risk of people you may have contact with and the risk of locations you may visit, adjust behaviour accordingly and avoid high-risk interactions and locations (Refer to BSF *Safe Visiting Practice Guidelines* 'Risk of Unknown Exposure to COVID-19')
- Resident's returning from any offsite outing or extended stay must wash their hands or use sanitizer immediately upon return to the facility and will be subject to Health Assessment Screening upon re-entry. Resident's that fail the Health Assessment Screening will be subject to quarantine or isolation precautions.
- Residents returning from offsite outings of less than 24 hours are not required to isolate, unless they fail the Health Assessment Screening.
- Residents returning from offsite outings and extended stays (including for medical reasons i.e. hospital visits) of more than 24 hours are required to isolate for 14 days upon return.

- If the resident shares a semi-private room, consent is required by the other resident for any offsite recreational extended stays of more than 24 hours, due to the isolation requirements that will also be imposed on the roommate if no alternative location is available.
- When a site is under investigation or in a confirmed COVID-19 outbreak, and for residents who are isolated, arrangements should be made, if possible, to support residents in obtaining necessities without them leaving the site.

### **Safe Physical Touch**

- The risk of transmission of COVID-19 increases with close proximity. If a resident and their designated family/support person(s) or visitor(s) understand this and they wish to include physical touch in their visits, this may be done by following the additional guidance:
  - Stop close contact with the resident and inform staff immediately for further direction if they are or become symptomatic during the visit.
  - Continuously wear a mask that covers the nose and mouth while within 2 metres of the resident. (Though a resident does not need to also wear a mask, they may choose to do so based on their own risk assessment).
  - Perform hand hygiene (hand washing and/or use of alcohol-based hand sanitizer) both before and after direct physical contact with the resident.
  - If resident is isolated due to symptoms of COVID-19 BSF will ensure that the designated family/support persons and/or visitors in extenuating circumstances have or are provided with the required PPE (based on precaution required), are trained, and have practiced the appropriate use of the PPE.
- Refer to BSF *Safe Visiting Practice Guidelines* 'Risk of Unknown Exposure to COVID-19':
  - Individuals at low risk of unknown exposure may engage in safe physical touch.
  - Individuals at medium risk of unknown exposure may engage in safe physical touch, where resident risk tolerance is high.
  - Individuals at high risk of unknown exposure are not recommended to physically touch the resident unless providing direct resident care wearing all appropriate PPE.

### **Safe Transportation**

- Any transportation must be done as safely as possible. Residents, families and visitors are responsible for contributing both to their own safety and to the safety of the other residents and staff at the site to which the resident will return.
- Transportation within private vehicles (e.g., if resident drives self or when a visitor or family member picks up a resident):
  - The resident or visitor/family member will ensure that the vehicle has been cleaned and disinfected prior to the resident entering, with focus on high touch surfaces (e.g., handles, steering wheel, window controls, armrests, seat belts, etc.)
  - Driver and all passengers must be masked
  - The driver and resident/passengers will sit as far apart as possible, minimizing the number of passengers in the vehicle (e.g., one driver with resident sitting as far away as possible)
- Public Transit (including city busses, LRT, handi-bus, etc.):
  - Follow guidelines set out by municipal transit operators to maintain safety
  - Maintain safe physical distancing

- Wear a mask
- Frequently use hand sanitizer and especially after having contact with high touch surfaces (e.g., armrests, doors and railings, handles, etc.)
- Refer to Government of Alberta's [physical distancing tips for public transportation](#)
- It is recommended that transport is directly to/from the location for the medically-necessary or essential appointment, or the primary destination for the social outing, and does not involve multiple, unnecessary stops or visits at various other locations.
  - If transport for a medically-necessary or other essential appointment is with an alternative driver, and not accompanied by a designated family/support person, transport must be directly to/from the approved appointment location only with no other unnecessary/unapproved stops.
  - If transport for a medically-necessary or essential appointment is with a designated family/support person as the driver or an accompanying passenger, additional unnecessary stops and visits are not recommended but may occur in accordance with guidelines for social outings.

### **Bringing Gifts, Items, and Food**

- Designated family/support persons or visitors in extenuating circumstances who are permitted to visit the resident indoors are permitted to bring essential/approved items including gifts and food to residents in accordance with BSF guidelines and procedures.
- Others who are not permitted indoor entry to visit residents may deliver essential/approved items including gifts and food to the site reception/screening area in accordance with BSF guidelines and procedures.
- Items brought into the site are to be declared and cleaned/disinfected upon entry screening, and depending on the risk level and at the discretion of the operator, some items may be required to be quarantined for a period of time (when disinfection is not possible).
- Outdoor visitors are permitted to bring food only to be consumed during Outdoor Visits, and must be packaged and served individually (no exchange of other items/gifts or food not consumed at point of visit is permitted).
  - Outdoor visitors must maintain 6 ft. physical distance from resident when consuming food/beverage (as mask cannot be worn while consuming food).
  - Mask and hand hygiene is required if visitors are required to come within the 6ft. physical distance to pass or assist resident with food (refer to BSF *Safe Visiting Policy* for 'Safe Physical Touch' and *Safe Visiting Practice Guidelines* for 'Risk of Unknown Exposure to COVID-19').
- Food brought into the site (including for consumption at outdoor visits) must be packaged in containers that can be wiped/disinfected and served individually (i.e. food, beverages or utensils are not to be shared with residents and visitors).

### **Laundry**

- Designated family/support persons will be permitted to commence doing resident's laundry offsite, if desired.
- No use of shared laundry facilities on-site will be permitted (if available at the site).

### **Pets**

- No pets will be permitted at this time for indoor visits.
- One animal is permitted during outdoor visits. The animal must be well (i.e. not displaying signs of illness, such as diarrhea or vomiting) and not come from a household with individuals at high risk of unknown exposure to COVID-19 as per the below risk of unknown exposure assessment guidelines

### **Non-compliance**

- Any occurrence of non-compliance or unsafe visitation (including non-compliance of PPE, not following instructions from staff, or abuse towards staff) will be subject to safety incident reporting and investigation, with possible visitation restrictions and isolation requirements.
- Residents in shared semi-private rooms who are required to isolate due to reasons related to non-compliance and exposure to risk may also impose a mandatory isolation on their roommate.
- Restrictions will be evaluated after no more than 14 days.
- Site Administrator or designate may refuse entry if there is reason to believe an individual is not abiding by the Safe Visitation policies or visitor responsibilities.

### **Disputes and Concerns**

The Foundation is committed to working with residents, designated family/support persons and visitors to address any concerns or disputes with respect, compassion and fairness. Should you have any disputes or concerns, the following processes are available to resolve your concerns:

- In the first instance, contact the direct care team at the site to ideally resolve any disputes/concerns
- If not resolved, escalate the dispute/concern to the site Administrator
- If not resolved, or at any time an alternative internal method of resolving the dispute/concern is preferred, contact the BSF Quality and Innovation team and a team member along with a social worker from a BSF site that is not appealing will review the dispute/concern
- If not resolved, escalate the dispute/concern to the Chief Operating Officer
- If not resolved, escalate the dispute/concern to the President and Chief Executive Officer
- Should the concern still be unresolved after speaking with the operator, Alberta Health Accommodation Standards and Licencing or Alberta Health Services Patient Relations (only for designated supportive living or long-term care) may be contacted for support.

### **Ongoing Review and Evaluation:**

- This policy is to be reviewed on an ongoing and as needed basis, at minimum every three weeks.
- Any changes to the policy will be communicated to residents, designated family/support persons and visitors as required.
- Residents, families and staff may propose amendments to this policy by contacting the site Administrator as required.