Collections Management Policies
Historic Saranac Lake and the Saranac Laboratory Museum

Purpose of the Collections Management Policy
The purpose of the Collections Management Policy of Historic Saranac Lake (HSL) and the Saranac Laboratory Museum (SLM) is to guide the museum staff, board, and volunteers in the acquisition, care, and use of collections to fulfill the mission of the museum.

Mission Statement
Historic Saranac Lake is a not-for-profit architectural preservation organization that captures and presents local history from our center at the Saranac Laboratory Museum.

Institutional History
Historic Saranac Lake was founded in 1980 as an architectural preservation organization. Our first task was to nominate and list over 170 resources to the State and National Register of Historic Places.

- 1980 -- Historic Saranac Lake founded.
- 1980s -- Nominated and listed 170 properties for our first National Register project.
- 1982 -- Mary Hotaling hired as first staff member.
- 1985 -- Published Cure Cottages of Saranac Lake by Philip Gallos.
- 1987 -- Hosted first reunion of TB patients in Saranac Lake.
- 1990 -- Hosted second reunion of TB patients.
- 1992 -- Participated in the celebration of Saranac Lake’s Centennial.
- 1993 -- Published Saranac Lake: Pioneer Health Resort by Mark Caldwell.
- 1995-2001 -- Preserved the Bartók Cabin. We continue to maintain the property and provide tours.
- 1997-1998 -- Partnered on and administered the Union Depot preservation project.

Historic Saranac Lake Collections Preservation Plan -- Updated October 2018
- 1998-2009 -- Restored the Saranac Laboratory.
- 2000 -- Established an endowment fund at the Adirondack Community Trust (now named Adirondack Foundation.) The fund has grown to over $330,000 as of 20118.
- 2009 -- Opened our first exhibits in the Saranac Laboratory; “125 Years of Science in Saranac Lake” and “The Great War: WWI in Saranac Lake.”
- 2011 -- Received a National Endowment for the Humanities Preservation Assistance Grant.
- 2012 -- Helen Hill Historic District created, adding about 60 properties to the NR.
- 2015 -- Completely updated permanent exhibits in Saranac Laboratory Museum to provide self-guided visitor experience and highlight patients who “cured” in Saranac Lake.
- 2015 -- Opened a new exhibit, “Medical Marvels: Science or Quackery?”
- 2016 -- Published A Rare Romance in Medicine: the Life and Legacy of Edward Livingston Trudeau by Mary B. Hotaling.
- 2017 -- Opened a new exhibit, “The Roaring Twenties: Check into a Grand Hotel.”
- 2017 -- Received an Institute of Museum and Library Services Museums for America Grant
- 2017 -- Received a design grant of $20,000 from the National Endowment for the Arts for design of the Cure Porch on Wheels. This allowed us to hire a designer and engineer to create the design, and a staff member to coordinate the project, along with the Oral History Project.
- 2018 -- Expanded the Berkeley Square Historic District, adding approximately 25 properties to the National Register.
- 2018 -- Awarded a $17,000 NYSCA grant to support the construction of the Cure Porch on Wheels and implementation of the project in 2018.
- 2018 -- Began the process of acquiring the Trudeau Building at 118 Main Street and expanding our Museum.

**Ongoing Projects**
- Caring for a collection of letters, manuscripts, photographs, and objects pertaining to the early scientific research and care of tuberculosis patients in Saranac Lake, and a variety of items relating to the architecture and general history of the community.
- Sponsoring educational events such as lectures, concerts, history days, and regular tours of historic sites.
- Coordinating an active school outreach program that includes regular tours of the Saranac Laboratory and other historic sites, in-class presentations, and outreach to teachers to help develop curriculum around our unique local history.
- Maintaining the HSL wiki site [www.localwiki.org/hs1](http://www.localwiki.org/hs1), an online archive of Saranac Lake area history that anyone can use and add to.
- Planning regular rotating special exhibits, including the upcoming “Art of the Cure” exhibit examining artists, writers, architects, and other creative individuals who came to Saranac Lake for the “cure.”

*Historic Saranac Lake Collections Preservation Plan -- Updated October 2018*
• Maintaining and providing tours of the Bartok Cabin, and planning for the future preservation of the site.
• Creating the Cure Porch on Wheels, a mobile oral history booth, exhibit space, and much more that will serve as a symbol of our unique history and architecture. The Cure Porch on Wheels will be finished in 2018.

Commitment to Collections Stewardship
The collections in the Saranac Laboratory Museum allow us to tell the story of the unique history of Saranac Lake. Without these items, we would be unable to communicate this important history to our visitors. We are committed to providing appropriate care, storage, and organization to our collections to further our mission.

Authority Statement
Historic Saranac Lake is a private, nonprofit, 501(c)3 corporation chartered by the Regents of the University of the State of New York and governed by the board of directors. The board of directors consists of not less than five nor more than fifteen members, each of whom serves a term of three years. The directors act in accordance with the by-laws of Historic Saranac Lake. The directors manage the Saranac Laboratory Museum by selecting an Executive Director, who is responsible for the hiring and supervising of staff.

The board of directors delegates collections management decisions to the museum staff through the Executive Director. A collections committee that includes museum staff, members of the board of directors, and members of the general public functions as an advisory group and recommends all collections policy changes to the board of directors based on the expertise of the museum staff.

Scope of Collections
What We Collect
Historic Saranac Lake collects printed and manuscript materials, maps, photographs, film, video and audio tapes, paintings, artifacts, ephemera, and other items which were created in, used in, or related to the Saranac Lake area, as defined by Saranac Lake Central School District.

Areas of Particular Interest

• The tuberculosis industry in Saranac Lake, c. 1884-1954, including doctors, scientists, patients, caregivers, and others involved in the industry.
• The Saranac Laboratory and its body of scientific research and publications.
• The life and work of Dr. Edward Livingston Trudeau and his descendants.
• Patients who came to Saranac Lake for tuberculosis treatment.
• The architecture of Saranac Lake, especially its cure cottages.

Historic Saranac Lake Collections Preservation Plan -- Updated October 2018
- Saranac Lake’s Union Depot and railroads.
- The Bela Bartok Cabin and Bela Bartok’s time in Saranac Lake.
- Daily Life in Saranac Lake and the surrounding communities (as defined by the school district).

*What We do NOT Collect*
We do not collect materials on the general history of the Adirondacks, the history of communities outside of the Saranac Lake Central School District, or TB treatment in other locations, except in cases where they belonged to or relate to notable persons or events in the Saranac Lake area. This is intended to reduce redundancy with collections of other local institutions with more appropriate collections scope and expertise.

*Collections History and Current Uses*
In the beginning, Historic Saranac Lake’s collecting activities were haphazard, governed primarily by the artifacts remaining in the Saranac Laboratory Museum, and by what donors brought to the organization. In recent years, we have made an effort to focus the collections, turning away donations that were outside of our scope, and occasionally purchasing materials of priority for the collections. We also now only accept materials where provenance or ownership can be proven (see “Accession Policy” for more information on provenance requirements and “abandoned” items).

Currently, our collections are primarily used within the institution for exhibits and research. This is due in part to the lack of physical and intellectual control over the collections, which, combined with our lack of a dedicated reading room, makes it difficult to provide researchers access to collections. This is an area of major focus as we prepare to rehabilitate the 118 Main Street building and move the collections there. This will help us further our mission to share our unique history with the public. We are concentrating on improving access to the collections, as evidenced by our 2011 Preservation Assessment, the work accomplished since that assessment, the addition of trained museum staff, and the 2018 Long-Term Preservation Plan.

*Categories of Collections*

*Archives*
The Archives of Historic Saranac Lake contain documentation of the history and activities of the museum and its collections. This includes collections documentation, financial records, board minutes, publications, legal documents, and other information related to the operations of HSL. This does not include archival materials that fall under the scope of the Permanent Collection.

*Education Collection*
The Education Collection contains items deemed to be duplicates, of questionable provenance, or otherwise expendable. These items are to be used and handled with students groups, tours, and other public programs. It is expected that these objects may incur damage and need to be disposed of or replaced periodically. Items will be purposefully purchased for the Education

*Historic Saranac Lake Collections Preservation Plan -- Updated October 2018*
Collection, or added to the collection with the full knowledge and consent of the donor. These objects are not accessioned, but will receive a unique tracking number. Items may be deaccessioned from the Permanent Collection to the Education Collection.

Library
The Library contains books, clippings, and other reference sources intended to serve as supplemental information for collections, interpretation, research, and scholarly activity. These materials do not circulate, but may be used by researchers on-site. These materials are not necessarily unique to HSL or of historical significance themselves. This does not include books and other materials that are part of the Permanent Collections.

Permanent Collections
The Permanent Collection is the main collection of the museum. It contains artifacts, books, photographs, ephemera, and other materials that fall under our collections scope and help further our mission of capturing and presenting Saranac Lake history to the public. The Permanent Collection may be subdivided into smaller collections belonging to a particular individual or institution. The Permanent Collection also contains archival material, but this is separate from the Archives of Historic Saranac Lake. The Permanent Collection also includes the Oral History Collection.

Collections Committee
A Collections Committee, as invited by the Executive Director, will be maintained to serve as an advisory group. This committee should made up of at least two staff members (usually the Executive Director and Museum Administrator), two board members, and two members of the general public when possible, with a maximum of ten members. The Collections Committee will meet on an as-needed basis, but at least twice a year, once in October and once in April.

The Collections Committee will, for the time being, serve as an advisory group to help inform the completion of the Collections Preservation Plan. The Collections Committee will be required to approve when HSL proposes to use organizational funds to purchase items for the collection, and when items are recommended for deaccessioning. They will also be informed of collections decisions such as outgoing loans, and present all collections activity to the Board of Directors. They will also review the Collections Policies on an as needed basis, or at least every two years. The function of the committee may change in the future as HSL develops our collections and completes our Collections Preservation Plan.

Staff Collections Committee
HSL will also maintain a Staff Collections Committee, currently consisting of the Executive Director, Museum Administrator, and Oral History Coordinator. The Staff Collections Committee will be responsible for approving items for accessioning, approving outgoing loans, and

*Historic Saranac Lake Collections Preservation Plan -- Updated October 2018*
recommending items for purchase with organizational funds. They will also review the Collections Policies and Collections Preservation Plan as needed but at least every two years, and work with the Collections Committee to update these documents as needed.

**Acquisition**

Acquisition of objects for the Permanent Collection is guided by the scope of the collections. Objects may be acquired through donation, bequest, or purchase, and the initial assessment is the responsibility of the Museum Administrator. The Staff Collections Committee (comprised of the Executive Director, Museum Administrator, and Oral History Coordinator) will review the object(s) for accession, but the final decision to accession rests with the Museum Administrator. When considering an object for acquisition, considerations must be taken with regard to its condition, size, uniqueness, and storage requirements. Proposed purchases of collections objects must also be reviewed by the Collections Committee. The Collections Committee will be apprised of donations and bequests, but their approval is not required unless Historic Saranac Lake funds must be used to acquire the object(s).

**Abandoned Objects**

Objects “abandoned” at the Saranac Laboratory Museum will be held for 90 days, at which point they will be considered the property of Historic Saranac Lake. They will at this point be assessed for acquisition. If they do not fit the scope of the collections, have unknown provenance, or the cost to maintain or store them outweighs their usefulness to the collections, they will be disposed of as seen fit by the Museum Administrator. See “Objects in Custody” for further information.

**Temporary Custody**

All objects received for possible acquisition must be entered into Temporary Custody until such time as they have been evaluated for accessioning. Donors or their representatives must sign a deed of gift agreeing to transfer ownership to Historic Saranac Lake. All acquisitions become the sole and absolute property of Historic Saranac Lake. With a few rare exceptions, HSL does not accept gifts with restrictions or conditions. See “Objects in Custody” for further information.

**Collections Records**

After an object(s) is entered into Temporary Custody, a file is created for that object(s). This file is permanent and should contain a record (printed on acid-free paper) of how the object was acquired, its provenance, and any other relevant information. This information is also entered into PastPerfect. This file will remain connected to the object as it is formally accessioned, and should be retained even if an object is not accessioned, later deaccessioned, or lost.
Accessioning
Once an object(s) is approved by the Staff Collections Committee, it will be accessioned by the Museum Administrator. It will be assigned an accession number that will be permanently linked to the object(s). It is now considered part of the Permanent Collection and its stewardship is the responsibility of Historic Saranac Lake. The Collections Committee will be informed of accessions at its regular meetings, and will present these accessions to the Board of Directors at their next regular meeting.

Deaccessioning
Historic Saranac Lake reserves the right to deaccession objects from its collections as approved by the Collections Committee. Deaccessioning is an important tool for collections management, but it is not a process to be undertaken lightly. Objects deaccessioned may not be sold, given, or otherwise transferred to Historic Saranac Lake staff or directors. No accessioned material shall be deaccessioned for two years after the date of its acquisition (see U.S. Tax Reform Act of 1984 and Internal Revenue Service regulations relating to the act). No accessioned object(s) shall be removed from Historic Saranac Lake’s Permanent Collection unless it meets one or more of the following criteria:

- The object is not relevant to the mission of Historic Saranac Lake and the Saranac Laboratory Museum.
- The objects is a duplicate to items already in the collections.
- The object is not suitable for exhibition, study, or use in programming by the museum.
- The object has deteriorated to such an extent that it cannot be stabilized or restored.
- Storage costs for retaining the item are not proportional to the value of the object.
- The object has been demonstrated to be a forgery or is otherwise fraudulent in nature or documentation.
- The objects has never been used to fulfill the museum’s mission and is not likely to ever be used for this purpose.
- The object is proven to be hazardous to museum staff and visitors.
- The object is revealed to have been stolen.

If one or more of the above criteria is met, the following steps will be taken in order to deaccession an item:
1. The Museum Administrator will recommend object(s) for deaccessioning to the Collections Committee. This recommendation will come in the form of a written plan that contains the name of the object, accession number/catalog number/markings on the object, date object was accessioned, reasons for deaccession, description of the object, a condition report, images of the object, disposal plan, and any other relevant information.
2. The Collections Committee will review the recommendations. A majority vote will be required to approve the plan.
3. A copy of the approved deaccession plan will be filed in the museum archives as part of the permanent collection documentation.

4. The disposal plan will be executed. Options for disposal are: destruction (to be witnessed by at least two members of the Collections Committee), exchange with another nonprofit institution with a similar mission, transfer to another nonprofit institution with a similar mission, or anonymous sale through a reputable dealer (proceeds from the sale of objects are to be use exclusively for the acquisition of new objects for the collection or for care of the collection).

5. All identifying marks (accession numbers, catalog numbers, etc.) must be removed from the object before exchange, transfer, or sale.

Loans

Outgoing Loans

Historic Saranac Lake will only loan objects from its collections to other nonprofits. The Staff Collections Committee must approve all loan requests, and notify the Collections Committee. Loan requests must be made in writing or by email, and include the following:

- Name and contact information for requesting institution.
- Name of person at the institution who is responsible for the loan.
- Street/delivery address for the requesting institution.
- Statement of insurance coverage and name of insurance company.
- Requested loan dates.
- Detailed description of the proposed use of the object(s).

Once the loan has been approved, a condition report must be prepared, and the borrowing institution must sign a loan agreement form. All loans will be assigned a unique number and a permanent file will be created with all relevant information, and the loan will be entered into PastPerfect. The Museum Administrator will pack the object for transport and make arrangements for transport with the borrowing institution. Any associated shipping/transport and insurance costs are the responsibility of the borrowing institution.

Incoming Loans

Historic Saranac Lake may request the loan of objects from other institutions or private individuals, but only if a comparable object is not available in its own collections. Historic Saranac Lake will supply a current Standard Facilities Report to lending institutions. The following procedures should be observed with incoming loans.

- A loan agreement and receipt will be generated and signed (if the lending institution does not have these forms).
- The Museum Administrator will unpack and photograph the object(s) and generate a condition report.
- A file will be created with all loan paperwork, the condition report, and photographs. All loans will be given an unique number. The loan information will be entered in PastPerfect.

Historic Saranac Lake Collections Preservation Plan -- Updated October 2018
• All loaned materials will be treated with the same care as the Historic Saranac Lake’s Permanent Collection.
• Once objects have been returned, records must be updated accordingly. Loan records are kept indefinitely.

Permanent Loans
Historic Saranac Lake does not accept items for permanent loan.

Objects in Custody
“Objects in custody” refers to objects left in the Saranac Laboratory Museum that Historic Saranac Lake does not own. These objects may include objects left accidentally or purposefully by museum visitors, objects left at the museum for review, unclaimed or abandoned loans, and objects found in collections which have no records of provenance or ownership.

No objects may be left at the museum without the creation of a temporary custody receipt. Objects “abandoned” at the Saranac Laboratory Museum without a temporary custody receipt will be held for 90 days, at which point they will be considered the property of Historic Saranac Lake. They will then be assessed for acquisition. If they do not fit the scope of the collections, have unknown provenance, or the cost to maintain or store them outweighs their usefulness to the collections, they will be disposed of as seen fit by the Museum Administrator.

Old loans and objects found in collections will be evaluated by the Museum Administrator and either disposed of, or accessioned in accordance with New York State Museum Property Law, Section 233-AA of New York State Education Law. The following procedures will be followed:

1. For items acquired prior to 2009: once the museum has held the objects in collection for a minimum of ten years without claim (or five years for unclaimed loans), HSL can begin the process of acquiring title. The following steps should be taken, as outlined in 233-AA.
   a. For objects where the lender/owner is known: HSL provide written notice (“Notice of Termination”) via certified mail, return receipt requested, to the lender/last known owner at the most recent address of our intent to claim title under the provisions of the law. If the lender/last known owner does not respond to the “Notice of Termination” letter within 120 days of receipt of the letter, we will send a second notice to the lender. If the lender/last known owner does not respond to the second notice within one hundred twenty (120) days of receipt of the notice, the museum shall automatically acquire all of the lender’s rights to the property.
   b. For items where the lender/owner is not known: the museum will acquire the rights of the lender, donor, or owner to unclaimed property and undocumented property by giving notice by publication each week for three consecutive weeks in the Adirondack Daily Enterprise, and a newspaper in the county of the last known address of the lender/owner (if known). If no one contacts the museum with documentation or other evidence establishing ownership interest in the property within 180 days of the notice’s appearance in the newspaper, the museum will
place a brief description of the property on the Unclaimed Funds Registry of the Comptroller's website for 180 days. If no one contacts the museum with documentation or other evidence establishing ownership interest in the property prior to or within 30 days following the conclusion of the Unclaimed Funds Registry posting, the museum shall acquire title to the property.

2. For objects received after January 1, 2009: the museum will acquire the rights to undocumented object(s) if no one comes forward to establish ownership of said object(s) within 90 days of receipt at the museum.

Documentation
All collections-related activities must be documented and maintained permanently. All relevant forms, correspondence, and other materials must be printed on acid-free paper, and labeled with appropriate identification numbers. These collections records include, but are not limited to, deeds of gift, provenance forms, accessioning information, loan forms, correspondence with donors, purchase receipts, storage location, and exhibition history.

The Museum Administrator and Oral History Coordinator are responsible for maintaining and updating collections documentation in a timely manner. All collections activities must also be documented in PastPerfect. PastPerfect’s database must be backed up regularly.

Collections Care
Historic Saranac Lake recognizes its responsibility to care for its collections and follow best practices to safeguard its collections for future generations. For this reason, staff will endeavor to maintain collections in the best physical condition while preserving the connection between objects and information about them. We are committed to the appropriate care and use of collections objects.

Preventative care of collections will be practiced through the maintenance of a stable storage environment, use of safe handling procedures and practices, maintenance of secure storage areas, and careful evaluation of new accessions to preserve standards of care. HSL will also endeavor to protect collections objects from fire, flood, and other natural disasters, as well as safeguarding them from theft and vandalism.

Collections Access and Use
Historic Saranac Lake is committed to providing the public access to its collections to engage visitors and encourage learning and research. The collections are available for use for all interested parties, and all researchers will be allowed equal access. Appointments must be made through the Museum Administrator, and may be made by phone, email, or in person year-round.

Historic Saranac Lake Collections Preservation Plan -- Updated October 2018
All researchers must provide proof of identity and complete researcher registration forms (except in the case of items in the Education Collection). All access must be supervised by a staff member at all times. All researchers will be required to follow “Researcher Rules” as provided by HSL staff.

Access may be limited in rare cases where use of objects might risk significant damage, if information is restricted by donor or by law, or if staff is not available to supervise use. Staff may also refuse access to individuals who have demonstrated a lack of care for or improper handling of collections objects in the past.

Staff must treat donor contact information as confidential, but information about an object's history, including donor, creator, or provenance information will be made available to researchers.

Photography is allowed in exhibits and when using collections for personal reference, but all scanning and photography for publication or other official uses must be done by a staff member.

Collections may be used for nonprofit and scholarly work, but commercial use must be approved by the Collections Committee and may incur a fee based on the proposed use.

Access to Medical Records

The Health Insurance Portability and Accountability Act (HIPAA) of 1996 governs access to medical records, including those created before the act went into effect. In April 2003, the Privacy Rule [45 CFR 160; 140] of HIPAA went into effect; this mandates that all records containing Personal Health Information (PHI) be restricted until 50 years after the death of the individual. While Historic Saranac Lake is not a covered entity under HIPAA and therefore not subject to its regulations, we recognize that many of our records about tuberculosis patients in Saranac Lake may contain sensitive medical information. We do not share medical documents containing PHI online unless the date of the individual’s death is known, and even in those cases we may redact some information as deemed necessary by staff. Family members of patients may have access to records remotely and in person upon request. We reserve the right to restrict access to documents with PHI for requests made by non-family members or for persons whom the date of death is not known. These requests will be reviewed on a case-by-case basis. If you feel that PHI about a family member has been shared publicly in error, please contact us and we will review the information.

Exhibits

Exhibits are HSL’s primary means of sharing collections objects with the public. All objects on exhibit should be labeled, including donor information (unless the donor has requested anonymity), and reproductions should be clearly identified.

Historic Saranac Lake Collections Preservation Plan -- Updated October 2018
Objects on display should be protected from damage, whether from environment, handling, or accidents. Exhibit spaces should be monitored for environmental conditions and security.

**Insurance**
The Board of Directors of Historic Saranac Lake, in consultation with the Executive Director, is responsible for annual review and renewal of the museum’s insurance policies.

**Security**
All collections, buildings, and grounds of Historic Saranac Lake and the Saranac Laboratory Museum should be secure and protected from criminal activity, vandalism, and accidents. An annual review will be conducted by the Museum Administrator and report the results of the review to the Collections Committee and Board of Directors.

Exhibit spaces will be periodically checked during open hours to ensure the safety of visitors and the collections. All collections storage areas are to remain locked after hours, and are only accessible during open hours by the Museum Administrator, except in extenuating or emergency situations. All access to collections storage areas must be logged, and all access by non-staff members must be supervised.

**Digitization and Digital Asset Management**
Historic Saranac Lake creates digital objects based on its physical collections, and acquires digital assets and images from other sources. In general, digital assets are managed in a similar manner to physical objects. Documentation requirements for acquisition and accessioning are essentially the same as physical objects.

Digital files should be saved in uncompressed, high quality TIFF, TXT, and PDF formats. JPEGs are acceptable where TIFFs are not available. Original digital files may not be modified once they have been accessioned, but clearly marked copies may be altered or adjusted. Digital files should be stored on Google Drive in the Collections Team Drive.

Digital files and backups should be reviewed annually and revised or upgraded as necessarily. Digital files deemed to be of great importance to HSL should saved in a hard copy format as well.

**Appraisals**
Staff members may not conduct appraisals, nor does Historic Saranac Lake pay for private appraisals. Staff may recommend that donors seek the assistance of a qualified appraiser, but
they may not make any recommendations or endorsements of a particular appraiser or appraisal group. Staff may not advise donors about tax laws.

**Ethics**

*Staff Collections*

Staff members must avoid any possible conflict of interest or appearance of conflict of interest with regard to personal collections. If an HSL staff member has the opportunity to receive or purchase any items that fall under HSL’s scope of collections, the staff member must inform the Executive Director immediately of this opportunity in order to allow the museum the first option on the objects.

*Conflicts of Interest*

No staff member, volunteer, or board member should engage in any activity that presents a conflict of interest with the museum or the appearance of a conflict of interest with the museum, including misrepresenting themselves in public or private, or using their relationship with the museum for personal gain.

*Consulting*

No staff member, volunteer, or board member of Historic Saranac Lake may engage in outside consulting unless the consulting is approved by the Executive Director. Consulting fees cannot be accepted for consulting work done during regular museum hours.

**Schedule for Reviewing and Updating this Document**

The collections policies should be reviewed by museum staff and the Collections Committee on an as-needed basis, but at least every two years. This interval may be extended as we move forward with the long-term preservation plan, but while we are in flux as we plan for and expand to the 118 Main Street building, it is important for this document to be updated regularly. This policies should be adjusted when appropriate as circumstances dictate, and added to when gaps are noticed.