



**ICS**  
ACT Inspector  
of Correctional  
Services

## OICS REVIEW RECOMMENDATIONS AND GOVERNMENT RESPONSES:

### 2019 HEALTHY PRISON REVIEW OF AMC

#### Summary

<i>Recommendations made by OICS:</i>	76
Agreed by government:	64
Agreed in-principle by government:	7
Noted by government:	3
Not agreed by government:	2

Recommendation	Government Response
1. That ACTCS implement a system or systems for the central recording of data on strip searching, use of force, separate confinement and segregation orders, time out of cells and incidents in a manner that facilitates inspection by oversight bodies and provides capacity for data interrogation and report generation.	<b>Agreed</b> ACTCS will ensure that there are centralised systems to meet the recommendation and is developing internal manual reports where they currently don't exist. Further work will be considered as to how these can be incorporated in CORIS.
2. That the ACT government acknowledge and respond to concerns expressed by Court Transport Unit staff about the transport and detention of children and young people by the Court Transport Unit.	<b>Agreed</b> A working group of senior officials from both JACS (ACTCS) and CSD (CYP) will be established to consider and respond to the matters related.
3. That ACTCS provide male and female peer support workers in the admissions centre to support detainees on their arrival to AMC.	<b>Not agreed</b> ACTCS is of the opinion that having peer support workers in the admissions area meet with new detainees would significantly increase the amount of time new detainees spend in the admissions area. Currently, there are peer support worker positions for both genders in the induction process, where more time is available for such interaction without the risk of lengthening the admission processes. The male position is currently filled, and appointment of the female position is currently being finalised after release of the previous one mid-January.
4. That the induction process for women be given urgent attention with regard to maximising time out of cells, provision of peer support and provision of up-to-date information about their obligations, rights and AMC routines.	<b>Agreed</b> The female induction process will be reviewed to meet these recommendations.
5. That practices for determining and maintaining protection placements be evidence-based, appropriately documented, and subject to a review mechanism.	<b>Agreed</b> ACTCS will ensure this is included in the new <i>Placement and Shared Cell Policy</i> .
6. That ACTCS finalise and implement the Incentives and Earned Privileges Policy as a matter of urgency and include a review and evaluation mechanism of the effectiveness and impact of the new policy after 12 months.	<b>Agreed</b> The <i>Incentives and Earned Privileges (IEP) Policy</i> is currently undergoing consultation with oversight agencies, ACTCS staff, and delegates, and will be finalised and implemented after this process. The IEP Policy will be reviewed after 12 months of operation.

Recommendation	Government Response
7. That ACTCS finalise and implement the detainee Disciplinary Policy as a matter of urgency and include a review and evaluation mechanism of the effectiveness and impact of the new policy after 12 months.	<p><b>Agreed</b> The <i>Discipline Policy</i> is currently undergoing consultation with oversight agencies, ACTCS staff, and delegates, and will be finalised and implemented after this process. The Discipline Policy will be reviewed after 12 months of operation.</p>
8. That ACTCS address the significant problems with the detainee disciplinary process including arbitrary and inconsistent application, and low awareness of right to review as a matter of urgency.	<p><b>Agreed</b> The issues outlined have all been considered in the <i>Discipline Policy</i>, which has been provided to oversight agencies.</p>
9. That ACTCS develop and implement a policy for the management and protection of human information sources.	<p><b>Agreed</b> A policy for the management of Human Information Sources will be developed.</p>
10. That ACTCS conduct a risk review to identify which internal fences and gates need to be designated as security barriers, and once identified, fences that do not meet the minimum security standards described in this report must be replaced as a matter of urgency and unnecessary gates removed.	<p><b>Agreed</b> ACTCS agrees that there is a need to conduct a risk review of the fencing and security barriers. Implementation of the review will be dependent on future budget outcomes.</p>
11. That ACTCS give serious consideration to a total redesign of the AMC visitor/staff pedestrian entry to better optimise entry barrier control and the efficient movement of people in and out of the centre.	<p><b>Agreed</b> The AMC Gatehouse, which is the visitor/staff entry, has been redesigned to enhance barrier control entry and improved entry and exit flow by an architect and has been costed by a quantity surveyor.</p>
12. That ACTCS take immediate action to develop and implement a random cell and communal area search program for the AMC.	<p><b>Agreed</b> This will be incorporated in the <i>Searching Policy and Strategy</i>.</p>
13. That ACTCS review cell searching training and undertake refresher training for custodial staff who may be required to search cells and other areas at the AMC.	<p><b>Agreed</b> All Correctional Officers (COs) may be required to undertake cell searches. This forms part of the mandatory CO training and refresher training will be made available through the annual training program.</p>
14. That ACTCS erect clearer signage at the AMC boundary warning that people and vehicles entering are subject to searching for prohibited items.	<p><b>Agreed</b> New signs will be ordered and erected.</p>

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15. That ACTCS review the number of K9 drug detection teams at the AMC and explore the possibility of employing a K9 mobile phone detection team either as part of the existing K9 Unit or on occasional loan from another jurisdiction.	<b>Agreed</b> ACTCS has reviewed the K9 commitment and acknowledge the need for two extra teams.
16. That ACTCS develop inventories to accurately record and account for all armoury equipment and supplies across the AMC.	<b>Agreed</b> The <i>Controlled Items Policy</i> was notified in August 2019, along with the <i>Controlled Items - Access to Armoury Operating Procedure</i> , the <i>Controlled Items - Auditing Operating Procedure</i> , and the <i>Controlled Items - Disposal Operating Procedure</i> . These set out the recording and auditing of armoury equipment and supplies across the AMC. Further arrangements for the recording of items such as Personal Protective Equipment (PPE) will be introduced locally.
17. That ACTCS develop and implement clear instructions for staff regarding the recording, control and disposal of contraband and provide necessary training to relevant staff.	<b>Agreed</b> Preservation of evidence training will be conducted simultaneously with cell searching as per recommendation 13. Clear instruction around the preservation of evidence will also be provided under the Security Framework.
18. That ACTCS review the current state of portable drug detection technology and its possible application at the AMC.	<b>Agreed</b> A review of available technology will be conducted and considered for use within the AMC.
19. That ACTCS maintain a consolidated strip search register as required under section 110 of the Corrections Management Act 2007.	<b>Agreed</b> A centralised register will be established in the short term until this function is established in the CORIS Offender Management System.
20. That ACTCS source conflict resolution and de-escalation training for staff to better equip them to deal with verbally aggressive detainees.	<b>Agreed</b> Conflict resolution training will be sourced and will be delivered as part of the annual training schedule. De-escalation training is currently included in the Use of Force training package.
21. That ACTCS develop a set of qualitative and quantitative Key Performance Indicators (KPIs) for the AMC that reflect the unique nature of the AMC as a prison with diverse operational challenges and complexities.	<b>Agreed</b> Key Performance Indicators have been identified and are currently being tested.

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22. That ACTCS develop an asset management plan for the AMC to ensure that there is timely and budgeted replacement or refurbishment of major plant and equipment at the AMC.	<b>Agreed</b> Development of the Strategic Asset Management Plan is underway and is expected to be completed by the end of July 2020.
23. That ACTCS develop a facility maintenance plan for the AMC to ensure that there is timely and budgeted attention given to maintaining the AMC's physical infrastructure.	<b>Agreed in principle</b> The annual Facility Management Plan is dependent on the Strategic Asset Management Plan, which prescribes the annual preventative maintenance schedule for the AMC. A preventative maintenance and asset refresh program has been developed and is subject to funding.
24. That, as a matter of urgency, ACTCS undertake a comprehensive electrical safety "test and tag" program at the AMC in accordance with ACT law.	<b>Agreed</b> This work had already commenced at the time of the Healthy Prison Review but was not yet finalised. To date, approximately 25% of testing and tagging at the AMC has been completed. An Operating Procedure will be developed to ensure the program is maintained once completed.
25. "That ACTCS re-establish a position of "Fire Warden" or "Fire Awareness Officer" at the AMC as soon as possible."	<b>Agreed</b> The Senior Director of Operations has assumed the role of Chief Fire Warden. A Fire Protection Manager was also appointed on 24 October 2019 to manage firefighting facilities and equipment and act as a liaison for fire monitoring.
26. That the ACT government commission an independent review of the ACTCS Corrections Officer custodial recruit training course, including a comparative analysis of similar courses in other jurisdictions, and the adequacy of on-going and refresher training provided to all AMC and Court Transport Unit staff.	<b>Agreed</b> ACTCS will commission an external review to assess the Custodial Recruit Training. ACTCS is currently finalising the Correctional Officers Enterprise Agreement which clarifies mandatory training and content will be reviewed once this is finalised.
27. That ACTCS publicly commit to an updated timeframe for bringing policies and procedures to a standard the community should expect for a custodial environment.	<b>Agreed</b> ACTCS has committed to having all <i>current</i> policies reviewed by the end of June 2020 and notified by the end of 2020. All associated procedures will also be completed by the end of 2020.
28. That ACTCS consult with the oversight entities when developing and updating policies and procedures.	<b>Agreed</b>

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	ACTCS has an established process to consult with the Human Rights Commission on policies as appropriate. Further consultation with other oversight bodies will occur as needed.
29. That ACTCS notify all current and future policies and procedures, including those that are restricted, on the ACT Legislation Register as individual notifiable instruments.	<b>Agreed</b> All current policies and procedures including those that are restricted are notified and included on the ACT Legislation Register.
30. That ACTCS review all restricted policies and procedures with the aim of making as many as possible fully unrestricted or unrestricted with necessary redactions of material that would be likely to disclose information that may endanger public safety or undermine justice, security or good order at a correctional centre.	<b>Agreed</b> ACTCS only restricts policies where there is a significant risk. The current policy review will consider all previously restricted policies and procedures. A number of previously restricted documents have already been published as unrestricted during the policy review project.
31. That ACTCS review the \$50 per week per detainee self-catering allowance, noting that the allowance has not been increased in at least nine years, and in future, ensure that the allowance is adjusted annually in accordance with the Consumer Price Index.	<b>Agreed</b> ACTCS will review the amount and will apply the CPI annually.
32. That ACTCS develop, jointly with current detainee delegates, a Terms of Reference for delegates meetings to clearly articulate the objectives and expectations for that forum, with an emphasis on constructive engagement.	<b>Agreed</b> The AMC will develop, jointly with current detainee delegates, a Terms of Reference for the delegates meeting which will articulate objectives and expectation for that forum with an emphasis on constructive engagement.
33. That ACTCS engage with oversight entities through the AMC Oversight Agencies Collaborative Forum to consider ways to improve awareness of external oversight bodies amongst detainees.	<b>Agreed</b> This will be placed as a standing item on the AMC Oversight Agencies Collaboration Forum.
34. That ACTCS take active steps through the provision of in-kind or financial support, to recognise the value that community organisations can bring to the correctional environment by providing certain programs, services and activities.	<b>Agreed</b> ACTCS recognises the value of community organisations in the provision of services to detainees. This is already a focus for the Senior Director Detainee Services and will be emphasised throughout 2020. The ACT Government, including ACTCS, continues to provide funding and support to the community. As such, ACTCS will fund community organisations providing services as needed.

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<p>35. That the eligibility criteria, expected timeframes and other relevant information about the Transitional Release Program be made public and clearly communicated to detainees, and ACTCS make a concerted effort to encourage female detainees to apply and support their full participation if eligible.</p>	<p><b>Agreed</b>  The <i>Transitional Release Program (TRP) Policy</i> will be reviewed and finalised by 31 March, and the operating procedure by 30 April 2020. These will be made public and notice will be provided to detainees as part of the implementation process. Specific reference to female detainees will be included to ensure they can participate fully.</p>
<p>36. That ACTCS seek an independent assessment on the staffing profile and capacity required for the Women’s Care Team to meet the objective of a gender responsive correctional environment, with sufficient meaningful activity, and develop a plan to reach the minimum acceptable level within 1 year.</p>	<p><b>Agreed in Principle</b>  The Women’s Care Team is not an established team, but rather a multidisciplinary group that meets regularly to cater to the needs of female detainees. This group is able to access all resources / services at the AMC. ACTCS employs a Women and Children Services Coordinator who is also able to draw on all resources across the AMC including two female Sentence Management Officers who are responsible for the sentence management needs of the females, female program facilitators, and the female Induction Coordinator. ACTCS recognises the need to meet the objective of a gender responsive correctional environment and further addresses this through the Women Offenders Framework, establishment of an internal Women’s Steering Committee and a broader external Women’s Reference Group.  The Women Offender Framework, anticipated to be completed by the end of 2020, will be used to inform future resourcing to support women offenders more broadly, while short term options will be considered by the Women’s Reference Group.</p>
<p>37. That ACTCS engage an independent Indigenous expert to review the security rating system to ensure that it is free of any “cultural bias” that could result in Aboriginal and Torres Strait Islander detainees being over-classified.</p>	<p><b>Agreed</b>  The over-representation of Aboriginal and Torres Strait Islander detainees is a significant concern for ACTCS and it is imperative that they are not unduly impeded in progressing through the classification system and therefore afforded the optimal opportunity for reintegration. An independent review will be undertaken.</p>

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38. That the ACT government, as a matter of urgency, fund the creation of a new position in the Indigenous Services Unit to work specifically, but not exclusively, with female Indigenous detainees and that this position be designated as female-only and Indigenous-only.	<b>Agreed</b> A funding submission for a new position in the Indigenous Services Unit has been prepared.
39. That the ACT government fund the creation of a new administration officer position in the Indigenous Services Unit at a level comparable to other such positions in ACTCS.	<b>Not agreed</b> There is sufficient administrative capacity at the AMC for the Indigenous Services Unit to access appropriate admin support.
40. That ACTCS be mindful of the spiritual significance of art for Aboriginal and Torres Strait Islander detainees before taking decisions that could affect detainees' access to their artworks and art materials.	<b>Agreed</b> This will be considered as part of the implementation of the <i>Detainee Property Policy</i> . The <i>ACTCS Art and Craft Policy</i> also highlights the importance for Aboriginal and Torres Strait Islander detainees to express themselves and connect with their cultural heritage through culturally specific art and craft programs and activities.
41. That ACTCS explore ways for Aboriginal and Torres Strait Islander detainees with extended family members at the AMC to be provided with opportunities to get together for social interactions on a regular basis.	<b>Agreed</b> The Indigenous Services Unit will consider what opportunities there are for more frequent social interactions.
42. That ACTCS consider employing Indigenous peer support workers, who can as part of their role meet and assist Aboriginal and Torres Strait Islanders on their admission to the AMC.	<b>Agreed</b> The AMC will review all provisions related to peer support detainees and their role with regard to admissions and induction and ensure that these meet the needs of the Aboriginal and Torres Strait Islander population. The Aboriginal and Torres Strait Islander Offender Framework that is being developed will further ensure evidence-based and culturally appropriate service provision to Indigenous offenders across ACTCS.
43. That Aboriginal and Torres Strait Islander female detainees be given access to the CALM and TAC programs as a matter of priority.	<b>Noted</b> ACTCS intends to commence a new horticultural industry which is expected to absorb the Culture and Land Management (CALM) program. A version of the horticulture program is already available to women and this will continue once horticulture becomes a prison



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	industry. While the Transfer of Art and Culture (TAC) program is not available to women, they have access to a separate art program called <i>Culture Inside</i> which is run via the Australian National University.
44. That ACTCS' proposed Disability Framework is informed by consultation with key stakeholders and completed in a timely manner to ensure ACTCS can meet or exceed the goals and time frames contained in the ACT Disability Justice Strategy First Action Plan 2019-2023.	<b>Agreed</b> ACTCS is working closely with the Office of Disability to ensure that we meet the obligations of the Disability Justice Strategy. The ACTCS Disability Justice Framework will follow subject to resourcing.
45. That ACTCS develop a policy approach that articulates and responds to the needs of older detainees.	<b>Agreed</b> ACTCS will establish a policy for the management and support of aged and infirm detainees.
46. That the ACT government considers funding an expanded multi-faith Chaplaincy Team in light of the increase in detainee population and noting the broad scope of their work.	<b>Agreed</b> A review of the current religious coverage will be undertaken and will consider the need to expand the Chaplaincy.
47. That ACTCS commit immediately to providing "electronic key" access to AMC accredited leaders of all major faiths subject to the normal security clearance process and security awareness training that applies to all visitors who require unescorted movement around the AMC.	<b>Agreed</b> Appropriately cleared and accredited religious leaders who provide regular services to detainees are now able to have electronic key (fob) access as required subject to completing normal security clearance and training.
48. That ACTCS facilitate means for detainees to contact accredited faith leaders directly (e.g. by email or telephone), without that contact dependent on ACTCS staff.	<b>Agreed</b> An up to date contact list for faith leaders will be established in consultation with these leaders and protocols established to ensure detainees are able to contact their respective faith leader, where they consent to having their contact details added to this list.
49. That the ACT Human Rights Commission conduct a review of the experiences of Muslim detainees accessing their faith in the AMC.	<b>Noted</b> This recommendation relates to the Health Services Commissioner, who is in independent statutory office holder within the ACT Human Rights Commission. Accordingly, the implementation of this recommendation is wholly a matter for the Health Services Commissioner.

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50. That on completion of the Hume Health Centre (HHC) renovations, ACTCS and Justice Health jointly agree on and monitor Key Performance Indicators in relation to access and flow of detainees in the HHC.	<b>Agreed</b> ACTCS and Justice Health Services will develop KPIs.
51. That relevant policies and practices are changed to ensure that non-smokers are never compelled to share a cell with a smoker.	<b>Agreed in principle</b> Smoking is not permitted in cells. However, it is acknowledged that this does continue. Smoking / non-smoking will be one of the factors considered when a cell sharing risk assessment is completed.
52. That the ACT Health Services Commissioner review the provision of dental health services at the AMC.	<b>Noted</b> This recommendation relates to the Health Services Commissioner, who is in independent statutory office holder within the ACT Human Rights Commission. Accordingly, the implementation of this recommendation is wholly a matter for the Health Services Commissioner.
53. That Justice Health align dental priority categorisation at the AMC Hume Health Centre in line with the community.	<b>Agreed in principle</b> Oral Health Services and Justice Health Services are working together through a newly formed strategic working group to review the delivery of dental services at the Hume Health Centre within the AMC. This will include reviewing dental priority categorisation alignment with the community.
54. That Justice Health capture data on cancellation of non-urgent scheduled medical appointments and the reasons for this.	<b>Agreed</b> Methods for recording reasons for cancellation and rescheduling of non-urgent scheduled medical appointments will be reviewed and operating procedures will be amended to capture these data.
55. That Justice Health investigate the viability of telehealth in the AMC to increase patient access to specialist review and treatment.	<b>Agreed</b> The use of telehealth at the AMC has been investigated and potential solution will be trialled.
56. That Winnunga, Justice Health and ACTCS as a priority, jointly identify any blockers to more effective cooperation and service delivery and strategies to overcome them.	<b>Agreed</b> There is already a tripartite working group in place to address any blockers. Where the operational working group cannot address an

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	issue, it is referred directly to the governance group (consisting of the Commissioner ACTCS, ED MHJHADS and CEO Winnunga) for resolution.
57. That ACTCS take immediate steps to obtain an independent appraisal by an appropriately experienced expert to ascertain the appropriate FTE of general practice psychologists for the AMC and develop a plan to reach the minimum acceptable staffing level within 1 year.	<b>Agreed in principle</b> ACTCS in conjunction with Justice Health Services will review current provisions for mental health acknowledging the range of services provided already that are not permanent staff at the AMC (i.e. Forensic Mental Health, Canberra Health Services resources, and Corrective Services New South Wales).
58. That ACT Health and ACTCS investigate the feasibility for detainees under a psychiatric treatment order receiving depot injections at approved mental health facilities aside from The Canberra Hospital Emergency Department.	<b>Agreed</b> The Chief Psychiatrist and Canberra Health Services have reviewed this practice and determined that current practices are appropriate. Detainees who consent to treatment receive depot injections on site and detainees who do not consent are treated through the pathway articulated in the Mental Health Act.
59. That ACTCS make changes to the existing CCTV setup in the AMC Crisis Support Unit to provide for protection of detainees' privacy when using toilets, while still ensuring appropriate observation for safety purposes.	<b>Agreed</b> A privacy mask will be added to the Crisis Support Unit CCTV cameras for toilets to be used with dignity. The privacy mask feature allows an area of the screen to be blocked from viewing.
60. That ACTCS and Justice Health examine the feasibility of making Naloxone available for administration after-hours in case of a drug overdose (including a trial of nasal Naloxone if feasible), supported by appropriate training in administration of the drug.	<b>Agreed</b> The Clinical Director will continue to review the legal requirements of the administration of naloxone nasal spray and who can administer it.
61. That ACTCS and Justice Health examine the feasibility of making Naloxone available to all detainees with a recent history of opioid use as part of a release pack.	<b>Agreed</b> Feasibility will be explored including options for JHS provided or NGO provided programs within the AMC to make naloxone available to detainees on release. This will include consideration of timeframes for implementation and identification of any barriers.
62. That ACTCS record cohort lock-ins and include this data in its reporting on out-of-cell hours for the annual Report on Government Services (ROGS).	<b>Agreed</b>

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	The <i>Regime Planning Policy</i> is currently being updated to ensure data recorded meets ROGS requirements. This includes a review of the recording and reporting of cohort lock-ins.
63. That ACTCS commission an independent education and training needs survey of detainees and draw on the results of that survey to better inform the structure, content and resourcing of the education and training program at the AMC, including ensuring it meets the needs of female detainees. The review should also engage with the ACT business community to identify education and training pathways relevant to employment in Canberra.	<b>Agreed in principle</b> ACTCS is seeking to commission a review and the intention will be to utilise findings to develop a statement of requirements to form the approach to market for the next iteration of the education contract. The current education contract will be extended to allow for this to occur.
64. That ACTCS engage both female and male recreation officers.	<b>Agreed in principle</b> ACTCS is currently going through a tender process to buy in recreational activities. A single recreations officer will be maintained as a coordinator as necessary, but the tender process will ensure female and male activities officers are provided from the selected supplier.
65. That ACTCS explore the feasibility and costs of providing a modest multi-purpose industries building at the AMC and look for opportunities for female detainees to engage in work within their unit.	<b>Agreed</b> Options for the development of a multipurpose industry building are being considered. Work is ongoing with the Women Offenders Framework and the Women Offenders Reference Group to further review opportunities for women to work within their unit.
66. That ACTCS review the efficacy of the sentence management system after six months of its implementation, including seeking feedback from key stakeholders. This review should reference performance data such as matters raised by detainees, number of meetings held with detainees, wait times to see a Sentence Manager, etc.	<b>Agreed</b> A comprehensive review of sentence management is underway and will be completed mid-2020. This will be incorporated into an Integrated Offender Management model focussed on enhancing reintegration and rehabilitation efforts.
67. That ACTCS review the current telephone call service provider arrangement with a view to obtaining a better cost-per-call rate for detainees.	<b>Agreed</b> ACTCS will undertake a jurisdictional comparative review and explore any new service providers.
68. That changes to the email software system to prevent the reading by staff of legal-in-confidence emails be completed as a matter of urgency.	<b>Agreed</b>

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	The email software system has been changed to allow detainees to communicate un-monitored with legal contacts. These changes were implemented between 26-30 August 2019.
69. That a system be put in place at unit level which ensures that detainees are notified promptly when their email and telephone accounts are set-up and ready for use.	<b>Agreed</b> A formal process will be implemented to ensure detainees are appropriately informed.
70. That requests for establishing telephone and email accounts from new reception detainees be given priority over non-urgent amendments to existing accounts.	<b>Agreed</b> A formal process will be implemented to ensure that new detainees are prioritised.
71. That regular Gatehouse staff be provided with professional customer relations training.	<b>Agreed</b> ACTCS intends to appoint a customer service manager for the Gatehouse and visits. Their role will be to enhance the visitor experience and enhance customer service.
72. That ACTCS review the Community Corrections Parole Unit – Policy and Procedures and promulgate it as an un-redacted Notifiable Instrument.	<b>Agreed</b> The Community Corrections Parole Unit Policy will be reviewed following completion of an investigation. The intention is to publish it on the ACT Open Access Register as a public document. This will also be impacted upon by the progress with Integrated Offender Management.
73. That ACTCS put in place quality control mechanisms to ensure that Pre-Release Reports are provided, and explained to, parole applicants not later than one week prior to their scheduled hearing before the ACT Sentence Administration Board.	<b>Agreed</b> ACTCS has already updated a process to ensure detainees are provided with their Pre-Release Reports in advance of their hearings. This will also be included in the new parole policy and procedure.
<b>Confidential Recommendations</b>	
74.	<b>Agreed</b>
75.	<b>Agreed</b>
76.	<b>Agreed</b>