

# NEWORLD THEATRE

## COVID-19 HEALTH AND SAFETY PLANS & POLICIES

---

*Thanks and additional credit to: Actsafe BC, Keltie Forsyth, Vancouver Creative Space Society, Rumble Theatre Society and Worksafe BC.  
Special Thanks to Jessie, Clayton, and Electric Company Theatre.*

---

Last updated: September 22 2020.

Approved by the Newworld Theatre Board of Directors: September 17 2020.

The following guidelines were created based on information provided by the BC CDC, ActSafe BC, WorkSafe BC and other federal and provincial health agencies. Newworld Theatre will continue to monitor health guidelines and adjust our policies accordingly. Our goal is to provide our staff, artists, and any public we engage with, the tools and information to mitigate the spread of COVID-19, while recognizing that we can't guarantee that an individual won't fall ill, and we all must take responsibility for our own health. We have implemented the following:

- We are working remotely as much as possible, and when we work or gather at PL1422, we follow the safety/capacity/cleaning guidelines as laid out by our facility management organization, Vancouver Creative Space Society. Those guidelines can be found here: [c-space.ca](https://c-space.ca)
- Before entering PL1422 to work for the first time, for the purpose of contact tracing and to read the safety guidelines, we ask everyone to register here: [c-space.ca/visit/](https://c-space.ca/visit/).
- Please stay home if any symptoms develop. Current symptoms include:
  - New or worsening cough
  - Shortness of breath or difficulty breathing
  - Temperature equal to or over 38 degrees Celsius
  - Feeling feverish
  - Chills
  - Fatigue or weakness
  - Muscle or body aches
  - New loss of smell or taste
  - Headache
  - Gastrointestinal symptoms (Abdominal pain, diarrhea, vomiting)
  - Feeling very unwell

- We ask anyone experiencing symptoms to not enter PL1422, and notify Newworld Theatre if you were in the building or had any interaction with Newworld in the 14 days prior to developing symptoms.
- There will be a detailed safety plan made prior to any rehearsals or events involving the public, following current provincial guidelines and mass gathering restrictions. We will communicate the plan in advance to all artists and audience, to ensure everyone feels safe before participating.
- We encourage all staff, artists and those who work with us this season to express any personal needs around COVID, recognizing that we all have different situations and levels of comfort. You can contact the Managing Director, Matt Moreau, at [matthew@newworldtheatre.com](mailto:matthew@newworldtheatre.com).
- Concerns or questions around our COVID policy can be brought forward to [info@newworldtheatre.com](mailto:info@newworldtheatre.com) and will be treated with confidence as a discussion takes place.

**Whether gathering for Newworld Theatre in person at PL1422, or at a venue offsite, we ask everyone to:**

- Maintain a physical distance of at least 2 meters from anyone not in your household bubble.
- If 2 meters can't be maintained, masks must be worn.
- Wash or sanitize your hands upon arrival and departure, and at regular (once per hour) intervals. Newworld Theatre will provide hand sanitizer at all gatherings.
- Follow any posted signage for cleaning (bathrooms, kitchens, all communal spaces, doors, light switches). Cleaning supplies will be provided.
- Avoid sharing tools whenever possible (including pens, pencils, etc).
- Report any health concerns or potential COVID exposure to [info@newworldtheatre.com](mailto:info@newworldtheatre.com).
- If you develop symptoms while gathering with Newworld Theatre, notify Newworld Theatre staff and leave immediately. Cleaning procedures will be followed.
- Help maintain capacity: room capacities will be posted for indoor spaces. Please observe and help maintain these capacities, removing yourself if needed.
- Work in ventilated rooms or outside as much as possible.

- If you have been outside BC in the last 14 days, please speak with Newworld Theatre before coming to an in person gathering.

**Further information and resources:**

- Health questions can be directed to 811, and information on COVID testing sites in BC can be found here: [BC CDC](#).
- The most up to date COVID-19 information from the federal government can be found here [Government of Canada Public Health](#).
- [BC Provincial Health Office Orders](#)
- [BC Centre for Disease Control](#)
- [Vancouver Coastal Health Authority](#)
- [WorksafeBC](#)
- [Actsafes Safety Association](#).

## **Work Place Safety**

### **Preamble**

While restrictions on public gatherings and various health orders remain in place to prevent the spread of COVID-19, Newworld Theatre and our Progress Lab facility management organization, Vancouver Creative Space Society (VCSS), are limiting work-related activities, functions, operations, procedures and facility access for the purpose of maintaining health, safety and physical distance of all workers, employed, contracted or volunteer.

At this time, Newworld Theatre and VCSS are doing everything we can to maintain a safe workspace. Our policies are in place to keep everyone as safe and healthy as possible. It is everyone's responsibility to follow our policies and public health best practices. **We cannot guarantee that you will not become sick**, nor do we take responsibility should you become sick. If you do develop symptoms within 14 days of any work or interaction with Newworld Theatre, you must notify Newworld Theatre at [info@newworldtheatre.com](mailto:info@newworldtheatre.com)/604-602-0007. If you see anything that concerns you during work, please let us know at [info@newworldtheatre.com](mailto:info@newworldtheatre.com) and/or [health@c-space.ca](mailto:health@c-space.ca).

### **Definition of a Worker**

A worker is defined as an employee, independent contractor, service provider or volunteer engaged in activity directed by or for Newworld Theatre, its Board of Directors, Artists, Independent Contractors, Employees, Volunteers, Service Providers or Funders.

### **Workplace Safety Accommodations or Alterations for Covid-19**

Workers are encouraged and required to express any concerns around Covid-19 workplace safety to the Managing Director, who shall respond within 48-hours to discuss accommodations or alterations to duties or operations with the worker. Accommodations or alterations that impact duties, functions or operations of other workers may require collaborative discussion to resolve, examining all potential impacts to all workers related to the accommodation or alteration of work.

### **Accommodation or Alteration Request Confidentiality**

Requests will be treated with confidentiality until action or further collaborative examination by multiple parties is required.

### **Registered Workers Only at 1422 William Street**

Any worker entering the premises at 1422 William Street must be registered with VCSS at [www.c-space.ca/visit](http://www.c-space.ca/visit) to provide contact information so the society can alert them should any potential exposure to COVID-19 be discovered at PL 1422, and be a staff member, contractor, service provider or volunteer of one of the Resident Companies at PL 1422 (Company 605, Electric Company Theatre, Newworld Theatre, Playwrights Theatre Centre, Rice and Beans, Rumble Theatre, Theatre Conspiracy, Tara Cheyanne Performance).

## **Health and Safety Rules when working at PL 1422**

All workers are required to adhere to current public health guidelines and orders while working, as well as Newworld Theatre and VCSS rules and requirements for health and safety as follows:

1. **Maintain Physical Distance** – all workers are required to maintain 2 meters distance from others who are not a part of their daily living household.
2. **Use of Masks / Face Shields** – all workers are required to use face masks or face shields when unable to maintain 2 meters distance from others.
3. **Personal Hygiene and Sanitizing** – all workers are required to regularly wash or sanitize their hands before and after touching surfaces or using any facilities, including washrooms. Workers are advised to avoid touching their face, eyes, mouth, nose, ears, head or other areas of their body where viral transmission is possible.
4. **Cleaning and Sanitizing Surfaces and Shared Workstations, Items and Equipment** – all workers are required to use spray sanitizers provided to clean and sanitize any surfaces they touch or use in the building after use, including door knobs, light switches, alarm panels, faucets, chairs, tables, desks, photocopiers, printers, counters, computers, consoles, appliances or other equipment. Workers are encouraged to clean frequently used items such as pens, pencils, staplers, hole punches, etc. regularly with provided supplies.
5. **Reporting Concerns and Potential Exposures** – all workers are required to report health concerns, hazards and potential exposures to Covid-19 to VCSS immediately at [health@c-space.ca](mailto:health@c-space.ca). Should a worker develop symptoms of Covid-19 within 14 days of use of PL1422, they will notify VCSS immediately.
6. **Leave Premises If Symptomatic** – Should a worker develop symptoms of Covid-19 during use, they will leave the premises immediately, and notify VCSS immediately at [health@c-space.ca](mailto:health@c-space.ca).
7. **Maintain and Monitor Occupancy Levels** – all workers are required to monitor occupancy to ensure compliance with current Overall Building Capacity levels (listed on page 8). This may require a worker to leave the premises.
8. **Self-Isolation** – in the event of known potential exposure to Covid-19, the appearance of any symptoms of Covid-19, or should a worker be travelling outside of Canada prior to work, they must self-isolate for a period of 14 days prior to working for Newworld Theatre.
9. **Visiting/Returning from Out of Province** – any worker who is working within 14 days of traveling outside of the province of British Columbia must disclose that information to the Newworld Theatre Managing Director before starting work.

10. **Stay Home When Feeling Ill** – all workers must stay home and/or offsite if they feel at all ill, sick, under the weather or otherwise unwell, and report that to VCSS at [health@c-space.ca](mailto:health@c-space.ca).
11. **Work From Home When Possible** – all workers agree to work from home as much as is possible for the duration of the Covid-19 Pandemic, limiting the number of potential exposures to the virus or possible transmission to others at work.
12. **Ventilation of Spaces** – While using facilities, workers are required to ensure that windows and skylights are open for ventilation, leave exterior doors open when possible and secure, avoid using fans that move air across spaces, and ensure any ventilation systems are on while they are in the building.
13. **Dishes and Dishwasher Use** – All workers must provide their own reusable dishes which will not be left in the kitchen area at PL 1422. PL 1422 will provide a limited number of disposable cups and cutlery that must be safely disposed of after use. Hand Washing of dishes is not permitted. Any dishes used at PL1422 must be thrown away or taken away by the worker. Any dishes left out, on counters, in fridges or on sinks will be disposed of. Workers may use the dishwasher to clean their dishes on the day of use. No soiled dishes will be left at PL 1422 overnight.
14. **Removing All Organics** – All workers will remove any organic waste they bring into the premises upon departure. Organics must not be left in fridges, appliances, or garbage/compost receptacles. Regular, non-organic garbage may be left in garbage receptacles.
15. **Altered Traffic Patterns** – to maintain physical distancing, all workers will adhere to the following entry, exit and shared space use traffic patterns:
  1. When using the Studio, Workshop and Rumpus Room, workers must enter the building from the front door, and exit from the side door.
  2. When using the Electric Company offices exclusively, workers must enter and exit using the side door only.
  3. Only workers from Newworld Theatre, Rumble Theatre, Theatre Conspiracy and Tara Cheyenne Performance may use the front staircase to access upper offices.
  4. Only workers from Electric Company Theatre, rice & beans and VCSS may use the back staircase to access upper offices.
  5. Only Registered Workers from Newworld Theatre, Rumble Theatre, Theatre Conspiracy and Tara Cheyenne Performance and Playwrights Theatre

Centre may use the corridor between the front door and the Washroom/Kitchen areas for any movement beyond entry (i.e. Washroom, Kitchen, Studio, Workshop or Rumpus Room use).

6. The worker in the building will ensure the side door deadbolt is locked, and will exit from the front door, arming the alarm.

16. **Specific Washroom Assignments** – to limit contacts, cross contamination and potential transmissions of the virus, workers will only use washroom facilities as assigned, as follows:

1. Accessible Washroom – Immune Compromised or Vulnerable Workers Only.
2. Single Washroom A – Studio, Rumpus and Workshop Workers Only.
3. Single Washroom B – Office Workers Only.

17. **Non-Work Related Activities Outdoors or Offsite** – when not directly engaged in work-related activities, workers agree to leave the premises when possible. Such activities include visiting, eating lunch, taking breaks, phone calls etc.

18. **Lingering in Communal Spaces and Areas** – workers will limit use of common areas as much as possible, and avoid lingering in communal spaces and areas (e.g. kitchen, hallways, entry ways).

19. **Newworld Theatre Right to Closure and Cancellation** – Newworld Theatre retains the right to cancel bookings for use, and/or close the building without notice.

### **Assumed Liability and Responsibility of Registered Workers**

1. All workers should **assume that all surfaces are contaminated** upon entry to the building.
2. **Upon arrival**, workers should wipe down commonly touched surfaces including door handles, light switches, alarm panel, kitchen counters, kitchen taps, bathroom taps and toilet handle with the cleaning solutions provided, to minimize hazards to all individual workers.
3. **Upon departure**, workers should wipe down commonly touched surfaces including door handles, light switches, alarm panels, kitchen counters, kitchen taps, bathroom taps and toilet handles with the cleaning solutions provided. Additionally, all surfaces and furniture used in the studio must be wiped down or cleaned with chemical cleaning agents, including tables, chairs, music stands, and the floor to prevent potential spread of Covid-19.

4. **If the kitchen is used or occupied in any way**, all surfaces including counter tops and taps must be sanitized and all food or food service items removed and/or disposed of.
5. **When washrooms are used**, all surfaces, including taps, toilet handle and countertops must be wiped down with sanitizer.
6. **Cleaning time before and after use** must be included/completed within your work schedule, to ensure zero overlap between bookings. Time shall be allocated for this purpose by Newworld Theatre.

### **Limiting Capacity**

The following temporary restrictions on capacity shall be observed at PL 1422:

- Temporary **Overall** Building Capacity Limit: **33**
- Temporary **Studio** Capacity Limit: **12**
- Temporary **Workshop** Capacity Limit: **4**
- Temporary **Rumpus Room** Capacity Limit: **1**
- Temporary **Office** Capacity Limits: **4** per enclosed office space.

It is the responsibility of all workers to monitor and maintain capacity limits to support health and safety of the workplace. Specific permissions for increased capacity for meetings and events will be communicated to workers by Newworld Theatre.

### **Guidelines for Accessing Space and Communicating Use of PL 1422**

1. Workers accessing the Newworld Theatre offices at PL 1422 are requested to use VCSS SLACK channel #Office-Visits to alert fellow companies of their intention to access their office or check the mail in advance, or alert Newworld Theatre's Managing Director or Producer, of their intended use, including arrival and departure times, prior to accessing offices. Should an office be at capacity, the worker must leave the space until the capacity levels permit their entry.
2. Workers accessing the Studio, Rumpus Room or Workshop spaces are required to book those spaces in advance with the VCSS Facility Manager or the Newworld Theatre Managing Director or Producer, and requested to check the SLACK channel #Office-Visits and #Studio-Visits to avoid any unnecessary contact with fellow workers during their visit.

### **Found in Contravention of Safety Plan and Policies**

Newworld Theatre reserves the right to deny workplace access to any worker found in contravention of the above policies.



## **Newworld Theatre Preventative Measures and Actions**

Newworld Theatre shall take the following measures and actions to support this health and safety plan, and the policies and guidelines within it:

1. Provide Hand Sanitizer, Soap, Sanitizing Spray, Sanitizing Floor Cleaners, and Disposable Gloves.
2. High contact or potentially hazardous surfaces will be marked with yellow tape to draw attention to the need for sanitization and hand washing.
3. Signages detailing this policy, occupancy loads, worker assignments of washrooms, and best practices for hygiene will be posted to remind workers of policy and support compliance.
4. A complete copy of this safety plan will be posted in each Newworld Theatre work space within the building.
5. Cleaning and sanitization supplies will be distributed throughout the building to each Newworld Theatre work space.
6. No more than two Studio worker groups will be permitted per day. One hour will be allotted between bookings for non-offices spaces to avoid overlap of workers.
7. Disseminate / Communicate this plan to all workers through:
  1. Email copy of this complete policy;
  2. Registering workers using an acknowledgement of reading and understanding of this policy, and attestation / agreement to comply;
  3. On site guidance/training provided on the first day of use;
  4. Regular reminders of the policy, health guidelines, cleaning and hygiene practices;
  5. By providing printed copies of the policy at all workplaces;
  6. Online via the Newworld Theatre website.
8. Should a confirmed or presumptive case of Covid-19 be connected to Newworld Theatre or PL 1422, all on-site work will be immediately cancelled until further notice, all workers will be notified. The workplace will remain empty for a period of at least three days, following which a rigorous cleaning and sanitizing of the premises will be completed prior to reopening.

## **Collection and Use of Registered Worker and Patron Data**

Registered worker data is collected for purposes of **contact tracing only**. It will be used and/or shared to contact registered workers if a case of Covid-19 occurs at Progress Lab or at any Newworld Theatre work site. It may be passed on to health authorities for contact tracing if requested. It will **not** be released to the public, shared with other registered workers, or used for marketing purposes. Data will be kept for **30 days**, after which it will be deleted.

## **Working from Home Health and Safety Policy**

### **Evaluating Safety in the Home Work Environment**

Newworld Theatre workers are requested to provide the following information on their home working environment prior to commencing work, to ensure workplace safety:

1. Detail any safety concerns related to electrical, material (asbestos, lead paint, etc), ventilation, tripping or slipping hazards.
2. Detail an evacuation plan for their home work environment.
3. Detail any concerns around ergonomics of workstations.

### **Reporting Injury in the Home Work Environment**

Newworld Theatre workers are required to report any injury during work at the home workplace to the Managing Director within 24 hours, complete any necessary reporting documentation, including a Worksafe BC injury report, and submit that to the Managing Director following any injury regardless of severity.

### **Reporting Home Workplace Violence**

Newworld Theatre workers are required to disclose any potential risk of, or incident of, violence in the Home Work Environment. Such disclosures will be treated with confidentiality unless required by law, and discussed with the worker to seek safe resolution and support a safe home work environment.

### **Check-Ins**

It is understood that Newworld Theatre workers often manage their own schedules when working from home – and will check in with the Managing Director each day when hours are known and scheduled.

## **Newworld Theatre COVID-19 Safety Protocols for the *Performing Arts***

In accordance with the WorkSafeBC protocol selection, an analysis has been conducted for measures to eliminate and reduce the risk of spreading COVID-19. As many of our activities require human interaction and close physical proximity, we understand the crucial need for a comprehensive safety plan and concise protocols to make our return to the stage as safe as possible for everyone involved.

Due to the nature of our work and industry, it is important to identify which employees are able to work remotely and or from home to reduce the risk of spreading COVID-19. Newworld Theatre personnel is currently composed of permanent artistic and administrative staff, board of directors, artistic consultants, as well as seasonal production staff and artists.

With the exception of our production staff and artists, everyone is able to work remotely and or from home to ensure the company continues to operate. That being said, the people most at risk will be protected by engineering and administrative controls as well as personal protective equipment.

We have made it a priority to educate and inform workers of the **Newworld Theatre and VCSS rules** as well as maintaining consistent communication and drafting a detailed safety plan before we make any decisions moving forward. These safety plans are crafted by cross referencing the ***Newworld Theatre Performance Health and Safety Rules*** (see next page) with the details of the designated project.

### **Details include:**

- Number of Newworld Theatre staff required on and off-site.
- Number of staff provided by the other party, venue, company, and or group.
- Identifying all possible instances of close physical proximity.
- Identifying all possible instances of shared items and making sure that there is a cleaning pre/post usage. (Props, costumes, kitchen equipment etc.)
- Contingencies for an outbreak and or development of symptoms during pre/mid/post production.
- Establish a point person and or liaison for all health-related issues and as a media representative this person will also be responsible for keeping track and making sure these guidelines are being followed.

The default point person for Newworld Theatre is:

Matt Moreau, Managing Director: [matthew@newworldtheatre.com](mailto:matthew@newworldtheatre.com)

## **Newworld Theatre Performance Health and Safety Rules**

These are a set of rules that **MUST** be adhered to by all participating workers.

1. If you've experienced COVID-19 symptoms in the last 10 days, it is mandatory that you self-isolate at home. Symptoms include:
  - New or worsening cough
  - Shortness of breath or difficulty breathing
  - Temperature equal to or over 38 degrees Celsius
  - Feeling feverish
  - Chills
  - Fatigue or weakness
  - Muscle or body aches
  - New loss of smell or taste
  - Headache
  - Gastrointestinal symptoms (Abdominal pain, diarrhea, vomiting)
  - Feeling very unwell
2. **If you've arrived outside of Canada**, it is a Federal Order that you must self-isolate for 14 days and monitor for symptoms. This can also be applied for provincial travel in order to eliminate all risks.
3. **Physical distancing:** When coming into contact with others, practice physical distancing and be very conscious of personal hygiene throughout the entire process. When unable to practice physical distance, a mask or face shield must be worn.
4. **Hygiene:** Wash your hands after touching anything that has been shared, on the floor, and visibly dirty. Avoid touching your face until you have done so.
5. **Sanitary supplies:** Newworld Theatre must ensure that there is enough cleaning supplies and sanitizers throughout the entire production and or project.
6. **Mask or Face Shield removal:** In the event that your mask or face shield needs to be removed due to artistic reasons, you must be at least 2 meters away from anyone else surrounding you and put your mask / face shield back on upon completion.
7. **Directors and Stage Managers** are strongly encouraged to not create blocking that breaks the rules of physical distancing and hygiene. This includes; fights, intimacy, transference of food etc. – (Provincial health rules take precedence over artistic choices, so please be conscious when making choices that might jeopardize the health and safety of everyone involved.)
8. **Directors, Stage Managers, or Senior Administrators** reserve the right to:

- Cancel and or postpone activities until further notice.
- Send someone home if they are exhibiting symptoms or are not compliant with health and safety guidelines.
- Enforce health and safety guidelines if met with disagreement or lack of compliance.

### **COVID-19: Occupancy Limits**

In accordance with the BC Centre for Disease Control, our event gatherings will be limited to **50 people maximum** with physical distancing and diligent hygiene practices applied which may reduce the capacity of any given space.

More information: [www.bccdc.ca/health-info/diseases-conditions/covid-19/event-planning](http://www.bccdc.ca/health-info/diseases-conditions/covid-19/event-planning)

### **COVID 19: Event Attendance**

All attendees to events will be required to register in advance of attending, and subject to the following mandatory **COVID 19 Protocols and Attestation**:

At this time, Newworld Theatre and VCSS are doing everything we can to maintain a safe workspace. Our policies are in place to keep everyone as safe and healthy as possible. It is everyone's responsibility to follow our policies and public health best practices. **We cannot guarantee that you will not become sick**, nor do we take responsibility should you become sick. If you do develop symptoms within 14 days of any work or interaction with Newworld Theatre, you must notify Newworld Theatre at [info@newworldtheatre.com](mailto:info@newworldtheatre.com)/604-602-0007. If you see anything that concerns you during work, please let us know at [info@newworldtheatre.com](mailto:info@newworldtheatre.com) and/or [health@c-space.ca](mailto:health@c-space.ca).

**BY REGISTERING** all attendees(users) agree and attest to comply with the following policy and guidelines from VCSS and Newworld Theatre:

- **Maintain Physical Distance** – all users are required to maintain 2 meters distance from others who are not a part of their daily living household.
- **Use of Masks/ Face Shields** – all users are required to use face masks or face shields when unable to maintain 2 meters distance from others.
- **Personal Hygiene and Sanitizing** – all users are required to regularly wash or sanitize their hands before and after touching surfaces or using any facilities, including washrooms. Users are advised to avoid touching their face, eyes, mouth, nose, ears, head or other areas of their body where viral transmission is possible.
- **Assume Surfaces Are Infected with Covid-19** – Despite strong cleaning and sanitizing protocols, all users should assume all surfaces are infected with Covid-19, and act accordingly. Cleaning and sanitization supplied will be provided on site, and users are requested to use them.

- **Reporting Concerns and Potential Exposures** – all users are required to report health concerns, hazards and potential exposures to Covid-19 to VCSS immediately at [health@c-space.ca](mailto:health@c-space.ca). Should a user develop symptoms of Covid-19 within 14 days of use of PL1422, they will notify VCSS immediately.
- **Leave Premises If Symptomatic** – Should a user develop symptoms of Covid-19 during use, they will leave the premises immediately, and notify VCSS immediately at [health@c-space.ca](mailto:health@c-space.ca).
- **Self-Isolation** – in the event of known potential exposure to Covid-19, the appearance of any symptoms of Covid-19, or should a user be travelling outside of the Country of Canada prior to use, they must self-isolate for a period of 14 days prior to using any facilities at PL1422.
- **Stay Home When Feeling Ill** – all users must stay home and/or offsite if they feel at all ill, sick, under the weather or otherwise unwell, and report that to VCSS at [health@c-space.ca](mailto:health@c-space.ca).
- **Altered Traffic Patterns** – to maintain physical distancing, all users will adhere to signage indicating traffic patterns inside the space.

#### **Collection and Use of Registered Attendee Data**

Registered Attendee data is collected for purposes of **contact tracing**. It will only be shared to contact registered attendees if a case of Covid-19 occurs at Progress Lab or at any ECT work site. It may be passed on to health authorities for contact tracing if requested. It will **not** be released to the public. Data will be kept for **30 days**, after which it will be deleted.

#### **Duration of Policies and Guidelines**

The above will remain in place until December 30, 2020 or until there is a change in government policy. After December 30, Newworld Theatre will review and may extend or alter these policies. Newworld Theatre reserves the right to change this policy at any time.