

Ritsumeikan Affiliated Schools Guidelines for Prevention of Harassment
(Affiliated Schools Teaching Staff and Other Staff)

Confirmed at the 3rd meeting of the Integrated Primary and Secondary Education Harassment
Prevention Committee on September 11, 2013.

I Basic Stance on the Prevention of Harassment

Aiming to create a school where there is mutual respect for the dignity and diversity of personality and mutual growth

(1) The Philosophy of the Ritsumeikan Charter

Built on the founding principles “freedom and innovation” and the core educational philosophy “peace and democracy,” Ritsumeikan University has promoted education and research and has engaged in the internationalization of education in an aim toward world peace through the coexistence of diverse cultures and the sustainable development of humankind. Standing at that point, Ritsumeikan established the Ritsumeikan Charter in 2006, showing therein its basic guidelines for the future.

The philosophy codified in the Ritsumeikan Charter stipulates the mission to “pursue the creation of universal values based on academic freedom and search for solutions to the pressing issues facing humankind, and pioneer the way to the future.” To accomplish this, it is vital that all involved mutually respect each other as humans, and transcend differences in philosophy and belief, race and nationality, and place of birth, recognizing each other’s universal prerogatives and human rights. As a place of growth and development, and a place for the unhindered quest for truth, it is most important for the University to be an environment in which individuals mutually respect each other’s personalities and are able to interact freely.

(2) Code of Conduct for Ritsumeikan Affiliated Schools Teaching Staff and Other Staff

Ritsumeikan affiliated schools teaching staff and other staff members adhere to the stipulations of the “Compliance Promotion Regulations.” Compliance refers to adherence by trustees, teaching staff, and other staff members to laws and the rules and regulations established by the Ritsumeikan Trust. It also refers to acting with the high ethical standards and social conscience expected of individuals engaged in education and research, executing one’s duties in a fair, equitable, and honest manner. In addition, Ritsumeikan affiliated schools teaching staff and other staff members are required to fulfill their duties in accordance with the relevant work regulations, and to refrain from harassment as stipulated in the Regulations and related laws and regulations. Further, if harassment occurs,

individuals are expected to handle the matter in a strict manner.

(3) Duties of Affiliated Schools Teaching Staff and Other Staff

Violence and harassment (which consists of a violation of human rights in word or action) must never occur at an educational institution aimed at human resources development. In addition, it is necessary to have a deep recognition that it is easy for authoritarian relationships and other environments that are conducive to harassment form easily in schools. In particular, harassment toward children and students must never be allowed.

It is hoped that these Guidelines will be understood and used proactively to enable each member of the organization to have an awareness of the basic concepts behind efforts against harassment, avoid becoming an offender, and handle the situation appropriately if he or she unfortunately becomes a victim of such.

(4) Positioning of the Guidelines

Along with the “Regulations for Prevention of Harassment, etc., of Ritsumeikan Affiliated Schools Teaching Staff and Other Staff,” the Guidelines shall be established as the guidelines to prevent harassment. Article 3 of the “Regulations for Prevention of Harassment” clearly stipulates that it is the duty of teaching staff and other staff members to adhere to the Regulations and the Guidelines and that they must refrain from harassment. The same applies to violations in the context of education for children and students.

II What Is Harassment?

(1) Definition of Harassment

At affiliated schools, “harassment” refers to a violation of human rights through words or actions on the part of teaching staff and other staff members that put other employees, children, students, or other related parties at a disadvantage or make them uncomfortable. It also refers to a violation of human rights through words or actions on the part of related parties that put children, students, or other teaching staff and other staff members at a disadvantage or make them uncomfortable.

(2) Sexual Harassment

Unwelcome words or actions constitute sexual harassment

Sexual harassment refers to a violation of human rights through unwelcome sexual words or actions that put others at a disadvantage or make them uncomfortable.

- 1) Giving others a feeling of humiliation or emotional pain, or making them uncomfortable,

through sexual (broadly defined) words or actions

- 2) Damaging the education, research, or workplace relationships of others through sexual words or actions (sexual posters, etc.) (“Hostile environment” sexual harassment)
- 3) Using sexual words or actions to demand behavior unwanted by the other person and bullying those who refuse such demands by putting them at a disadvantage in personnel affairs or performance evaluations, etc., or hinting at doing so, in the workplace or in the context of education or research (Sexual harassment using one’s position or status and other “Quid pro quo” sexual harassment)

Further, there are cases in which words and actions that were not a particular problem in the past are considered to be sexual harassment. In order to have a correct understanding of sexual harassment, it is important to act with an awareness of the following.

- 1) Respect the personalities of others.
- 2) Recognize that others are important partners.
- 3) Do not view the opposite sex as inferior.

From this perspective, sexual harassment between members of the same sex and discriminatory words and actions based on sexual stereotypes are also included.

Forced consent and understanding relationships

Unwelcome sexual words or actions constitute sexual harassment. Relationships of power undeniably exist, such as the relationship between teachers and children/students. It must be understood that in such relationships the victim may reluctantly accept or endure the behavior, and that the lack of a clear refusal should not be readily judged to constitute consent.

Sexual harassment of children and students

Sexual harassment of children and students harms the dignity and personality of children and students, decreases the desire to learn, and otherwise has detrimental impact on future growth that is difficult to avoid. Such behavior must not be tolerated. In addition, schools stand on the support, understanding, and assistance of parents and guardians, the community, and society. It is likely that sexual harassment of children and students would generate distrust of the teaching staff and other staff members not only of the particular school, but of Ritsumeikan in general, threatening even the very existence of the school.

Depending on the content, sexual harassment of children and students may also constitute a violation of criminal law, the Child Welfare Act, or local ordinances (for example, the “Ordinance Regarding

the Healthy Development of Youth” in the case of Kyoto Prefecture), and there may be a question of criminal liability. In addition, if behavior is deemed to constitute harassment, the school’s action in accordance with the stipulations of the Work Regulations may include disciplinary action (Article 60) or dismissal (Article 22).

(3) “Violations in the Context of Education” for Children and Students

“Violations in the context of education” for children and students consists of the following.

- 1) Denying or neglecting necessary educational guidance without a justifiable reason
- 2) Imposing excessive assignments
- 3) Treating students unfairly, such as unjustifiable evaluations related to grades or the acquisition of credits
- 4) Hindering the free selection of a future track or employment, threatening to do so, etc.

However, there is room for debate regarding the decision on whether to handle a child's or student's allegation of a “violation in the context of education” as harassment, depending on the child’s or student’s stage of development and accountability. When providing children and students with educational guidance, it is necessary to give sufficient attention to ensuring that the organization conducts sufficient examination, preparation, and implementation based on a clear policy, and to ensuring that parents and guardians are given clear and careful explanations. It is also necessary to prevent “violations in the context of education” for children and students, and to ensure that there are no words or actions that could be viewed as harassment.

(4) Power Harassment

Power harassment refers to the use of a superior work assignment or other position or personal relationship, etc., to give guidance or warnings outside the individual’s sphere of authority, and causing others emotional or physical pain through words or actions that violate their interests, personality, or dignity in connection to their employment, as well as words or actions that are detrimental to the workplace or other environment. The types of power harassment are given below, along with examples.

- 1) Words and actions that constitute harassment even if they occur only once
 - i. Physical violence or threats, slander, and other attacks that fall under criminal law
- 2) Words and actions that constitute harassment when they continue to occur
 - i. Insults, verbal abuse, and other psychological/emotional attacks on others
 - ii. Segregating, ostracizing, ignoring, or otherwise cutting others off from personal relationships
 - iii. Forcing others to do something that is clearly unnecessary or impossible to achieve, obstructing work, etc., and other excessive demands
 - iv. Unreasonably ordering low-level work, etc., that is significantly separated from the

individual's abilities and experience, not giving work at a sufficient level, or otherwise having excessively low demands

- v. Getting excessively involved in the individual's private affairs or otherwise violating personal boundaries

The aforementioned behavior, when occurring in a context of status or superiority, regardless of whether it is in the workplace or not, constitutes power harassment.

The following types of behavior are also considered to be harassment.

- Forcing others to drink alcohol

Demanding that others drink alcohol or engage in "chugging," intentionally getting others drunk, not giving consideration to those who do not drink alcohol, getting drunk and being a nuisance, and other forms of harassment involving alcohol

- Gender discrimination

Discriminatory words or actions based on stereotypes of masculinity and femininity, regardless of the individual's abilities and characteristics (For example, making women prepare tea or clean because they are women)

- Domination in a romantic relationship (date DV)

"Violence" occurring between romantic partners through physical actions, words, or demeanor. Hitting, kicking, yelling, denying the person's personality, checking the person's mobile phone messages or e-mail, restricting the person's actions, clothing, or social circle, forcibly engaging in sexual behavior, etc.

III Scope and Targets of the Guidelines

The Guidelines shall apply to all individuals involved with affiliated schools. Individuals involved with affiliated schools include teaching staff (whether part-time or full-time), non-teaching staff (including administrators, Fixed-term Employees (Keiyaku Shokuin), part-timers, and other contract workers and subcontractors working at affiliated schools), and children and students. Further, the Guidelines shall apply to teaching assistants and other individuals engaged in supplementary work in the educational activities of affiliated schools, as well as the parents and guardians of children and students and other related parties.

In addition, the Guidelines shall apply to the words and actions of teaching staff and other staff members that have significant impact on learning, education/research, and work at affiliated schools, whether during the regular curriculum or during extra-curricular activities, during or outside working hours, on or off school grounds, and otherwise regardless of time and place. (Note (1))

Teaching staff and other staff members, etc., who have retired are able to consult and petition

regarding incidents that occurred while they were employed. Children and students, etc., who have graduated or withdrawn from school are able to consult and petition regarding incidents that occurred while they were in school. Moreover, the Guidelines apply even when only one of the individuals (the victim or the offender) is involved with an affiliated school. (Note (2))

(Note (1))

In the event that a teaching staff member assigned to an affiliated school engages in harassment while serving as a part-time teacher at another school, etc., it is considered to be behavior outside the duties conducted with permission for dual employment, and is handled as behavior in the individual's private life. As a rule, the matter is handled at the relevant school. However, if it is found that the individual had engaged in inappropriate behavior, and the reputation and trustworthiness of Ritsumeikan would be significantly damaged, the individual could, of course, be subject to disciplinary action, etc.

(Note (2))

If the petitioner [*1] or victim is an individual involved with Ritsumeikan, but the target of the petition (the opposing party [*2]) or the offender is not, the intent, etc., of the Guidelines is explained to the opposing party or the offender and his or her understanding is sought. In addition, the organization to which he or she belongs is notified/contacted and asked to take action to prevent recurrence, conduct an investigation, etc.

[*1] Petitioner: If the consulter petitions for an investigation or adjustment after harassment consultation, he or she is referred to as the petitioner.

[*2] Opposing party: The individual accused of harassment by the consulter or petitioner is referred to as the opposing party.

IV Basic Mindset to Avoid Engaging in Harassment

In order to avoid engaging in harassment, it is first and foremost important to take a stance of respect for fundamental human rights.

Because the way things are felt differs according to the individual and position, there is a tendency to view harassment as being difficult to judge. However, it may be helpful to put yourself in the other person's shoes.

For example, in the case of sexual harassment, imagine your words and actions being directed at your spouse, child, boyfriend/girlfriend, or someone else very close to you. If that is unpleasant, it is highly likely that those words and actions constitute harassment.

Further, in the case of power harassment, think about how you would feel if you were treated that way. If it would feel unfair or decrease your motivation, it is highly likely that those words and actions

also constitute harassment. On that foundation, be sure to have a sufficient recognition of the following.

(1) The Other Person's Perception is the Criteria

The way people perceive sexual words and actions in particular differs between individuals, between men and women, and between people of different positions or awareness, etc. Keep in mind that the way the other person felt is one of the criteria for judging whether something constitutes sexual harassment. Even when words or actions are intended to be an expression of familiarity, they may make the other person uncomfortable despite your intentions. Further, arbitrarily presuming that the other person will allow a certain amount of the behavior in question, or unilaterally assuming that you have built an intimate relationship with the other person, is a cause of harassment.

(2) Don't Repeat the Same Words or Actions

If you see that the other person is rejecting or bothered by your words or actions, it is important that you do not repeat those words or actions.

(3) There Might Not Be a Declaration of Intent

The other person will not necessarily always state that your words or actions make him or her uncomfortable. In many cases, the person who was harassed will be unable to reject it due to a personal relationship such as with an advisor or supervisor, etc. You must not interpret the lack of a clearly stated rejection as agreement or consent.

(4) Pay Attention to Extensions of the Workplace/Classroom

It is not enough to pay attention only to harassment during working hours or in the workplace. For example, it is necessary to pay sufficient attention to harassment in contexts in which personal workplace or classroom relationships are maintained, such as training camps, casual drinking, parties, and other such events.

V If You Have Experienced Harassment

It's not the victim's fault

Harassment is not something that occurs because of the victim. Do not blame yourself or simply endure the problem. Please take action toward a resolution before the situation gets worse.

In some cases, the other person is not even aware that his or her words and actions constitute harassment. There are also cases, such as when you do not have an adversarial relationship with the other person, in which you can solve the problem yourself by directly communicating to the person verbally or in writing that his or her words or actions are harassment, and that they make you

uncomfortable.

In emergencies such as when you are in physical danger, seek assistance from those close to you, or at a faculty or administrative office. Depending on the situation, it may be necessary to contact the police immediately. If you go to the police, a harassment consultation staff member or a teaching staff member/other staff member will accompany you.

Instructions on what to do if you have experienced harassment, emergency contact information, and outside counseling services can be found on the Harassment Prevention Committee website.

VI Working Toward a Solution to the Problem

(1) Harassment Consultation

In order to provide harassment consultation, “harassment counseling staff members” are assigned to each affiliated school and to the Division of Integrated Primary and Secondary Education, making it possible to provide sound harassment consultation.

Consultation is also available by telephone and e-mail. As a rule, consultation is provided face to face. It is provided in a facility/location where the protection of privacy can be ensured. Please select the harassment consultation staff member who is closest and easiest to consult with. Naturally, it is possible to switch to a more appropriate harassment consultation staff member during the process of consultation.

In the event that someone other than a harassment consultation staff member is consulted about harassment, it is of course fine to provide consultation. However, please recommend that the consuler go to a harassment consultation staff member, and connect the individual with a harassment consultation staff member. The reason is that it is necessary to take prompt action to help the victim and work toward solving the problem. In addition, if the consuler desires or requires it, the cooperation of a counselor or other outside specialist can be obtained.

Harassment consultation staff members have a duty to observe confidentiality. The details of consultation and real name of the consuler will not be disclosed by the harassment consultation staff member who was directly consulted, or to individuals outside the Integrated Primary and Secondary Education Harassment Prevention Committee, without the authorization of the consuler.

(2) Records of the Details of the Incident

The actual circumstances of harassment are sometimes difficult for those not involved to understand. If you feel that you have experienced harassment, please do your best to record things such as when it happened, where it happened, who was involved, and what was done, accurately and in detail.

If a third party is involved, another thing that can be done is to ask that person to be a witness. It

may help in objectively judging the matter and solving the problem.

(3) Duty to Observe Confidentiality

Harassment consultation staff members, members of the Integrated Primary and Secondary Education Harassment Prevention Committee, members of the Investigative Committee, and other individuals involved in consultation or the various procedures for filing a petition have a strict duty to observe confidentiality in order to protect the privacy of the consulter and other related parties. This applies not only to the consulter, petitioner, and opposing party, but also to individuals who cooperate as third parties in the investigation. In addition to real names and the contents of consultation/petitions, other information that is obtained must not be disclosed to others even after individuals have left their current duties.

(4) Concrete Methods of Resolution

1) Petition classifications and measures

Consulters can petition for a resolution to the problem in question.

Petitions are classified as follows. The consulter selects his or her desired resolution method.

Classification	Contents	Measures
Notification	In accordance with the wishes of the individual seeking harassment consultation, the individual against whom the complaint is being made will be notified that a harassment complaint has been received regarding the specific behavior, and efforts will be made to resolve the problem. You will remain anonymous to the individual receiving notification.	A member or the secretariat of the Integrated Primary and Secondary Education Harassment Prevention Committee communicates the contents of the petition to the other party.
Coordination	From a fair and equitable standpoint, the assertions of the individual seeking harassment consultation and the other party are coordinated and efforts will be made to resolve the problem.	The chair of the Integrated Primary and Secondary Education Harassment Prevention Committee and the individual responsible for the other party (principal, administrative manager, etc.) discuss and coordinate the appropriate measures that should

		be implemented.
Investigation	If a fair and equitable investigation of the relevant facts finds that the behavior in question constitutes harassment, efforts will be made to resolve the problem by requesting strict measures, including consideration of disciplinary action against the other party.	Establish an Investigative Committee under the supervision of the Integrated Primary and Secondary Education Harassment Prevention Committee.

2) Efforts toward resolution

Petitions can be made by submitting them in writing to a harassment consultation staff member. This is to give harassment consultation staff members an accurate understanding of the contents of the petition.

If a petition is submitted, the Integrated Primary and Secondary Education Harassment Prevention Committee is immediately notified. The Integrated Primary and Secondary Education Harassment Prevention Committee determines the most effective method of resolution in accordance with the contents of the petition, while respecting the wishes of the petitioner.

The Investigative Committee that is established when the petition is filed for an investigation is composed of members of the Integrated Primary and Secondary Education Harassment Prevention Committee and the secretariat. They are selected with consideration given to maintaining the fairness and neutrality of the investigation. (Harassment consultation staff members do not conduct coordination or investigations on their own.)

In addition, if the Prevention Committee chair judges that an emergency response is required at the time the secretariat of the Integrated Primary and Secondary Education Harassment Prevention Committee receives the “Harassment Consultation Log Book” (created by the harassment consultation staff member), academic action or other measures may be taken without waiting for submittal of the petition form or a meeting of the Harassment Prevention Committee.

Further, a lawyer or other outside specialist can be commissioned as an expert committee member when necessary. If the consulter and the opposing party are part of the same division or department, a system to handle adjustment is established in some cases, mainly consisting of members of that organization. In such cases, the Integrated Primary and Secondary Education Harassment Prevention Committee provides advice and assistance from a school-wide perspective in order to ensure the fairness and equity of measures. In the case of measures implemented at individual affiliated schools as well, in addition to concentrating

information in the Integrated Primary and Secondary Education Harassment Prevention Committee, efforts are made to resolve the problem in collaboration with the Integrated Primary and Secondary Education Harassment Prevention Committee.

(5) Prohibition of False Allegations and Cooperation with Investigations

False petitions related to harassment and false statements during investigation of the relevant facts are strictly prohibited. This applies not only to the harassment petitioner and the opposing party, but when third parties are asked for their statements as well. In the event that such behavior does occur, the individual may be subject to disciplinary action.

In addition, the petitioner and the opposing party must cooperate in the investigation of the harassment case in which they are involved. When asked for cooperation as a third party, please do so as much as possible in order to verify the facts and solve the problem. As has been mentioned, individuals involved in the investigation have a strict duty to observe confidentiality. Accordingly, your privacy will not be violated and you will not be put at a disadvantage due to your statement as a witness.

(6) Integrated Primary and Secondary Education Harassment Prevention Committee

- 1) The function of the Integrated Primary and Secondary Education Harassment Prevention Committee

In addition to public relations and information campaigns for the prevention of harassment, the Integrated Primary and Secondary Education Harassment Prevention Committee has the important assignment to investigate harassment cases and recommend solutions to problems, measures to implement, and actions to take at each affiliated school. Accordingly, the Committee requires a certain amount of authority. The Executive Trustee of Integrated Primary and Secondary Education serves as chair, and the Dean of the Division of Integrated Primary and Secondary Education serves as vice-chair. In addition, outside specialists and experts may participate in the Committee as well. In regard to specific consultation cases, the vice-chair and the Chief Administrative Officer establish a structure that allows agile response, with final decisions being made as part of the chair's responsibilities.

- 2) Local Harassment Prevention Committees

The core of the duties of the “Local Harassment Prevention Committees” is prevention, training, and information campaigns aimed at the prevention of harassment at each school. Even when harassment consultations or petitions occur at a school, all of the information is concentrated in the Integrated Primary and Secondary Education Harassment Prevention Committee, and the matter is handled in accordance with the policy of the Integrated Primary

and Secondary Education Harassment Prevention Committee. The principal serves as the committee chair, and the assistant principal serves as the vice-chair.

3) Measures implemented by the Integrated Primary and Secondary Education Harassment Prevention Committee

If the Prevention Committee chair believes that an emergency response is needed, the relevant organizations may be asked to implement measures. For example, changing classes or suspending the opposing party's Rainbow account are possibilities for educational measures. Further, the Prevention Committee chair may ask the principal to change the assigned duties or place of work of the opposing party teaching staff member, or have them resign from trainee assignments. If the Prevention Committee decides that the behavior in question constitutes harassment in light of the results of the investigation conducted by the Investigative Committee, or even if it does not, the Prevention Committee proposes the orientation of the solution, and while discussing the matter with related organizations as necessary, requests strict measures and the appropriate guidance, and otherwise takes the responsibility to solve the problem.

4) Disciplinary action

In the event that teaching staff or other staff members engage in harassment in the workplace, etc., he or she becomes subject to disciplinary action in accordance with the stipulations of the Work Regulations.

Recommending such action to the chancellor is the role of the Prevention Committee. Even in cases in which the resolution of the problem is sought through the notification, coordination, or investigation process, recommendations are made in the same manner when it has been judged that there has clearly been an occurrence of harassment.

The Prevention Committee does not make the final judgement regarding disciplinary action. It is conducted in accordance with the separately established "Regulations Regarding Procedures for Disciplinary Action." It is necessary for the determination of disciplinary action, etc., to be fair. A comprehensive judgement is made in accordance with the specific form of harassment (time, place, contents, degree, etc.), the relationship between the parties involved, and the victim's response and feelings, etc. If the behavior is deemed to constitute harassment, the opposing party is given the opportunity to justify and explain his or her actions before a recommendation is made, and fairness is sufficiently ensured.

5) Prevention of recurrence and support for victims

After an incident is determined to constitute harassment, the opposing party is provided

with assistance and guidance to encourage reflection and awareness, such as training to enable the individual to gain a sufficient understanding of harassment and to prevent the person from ever repeating the behavior again.

In addition, the victim is provided with support, such as establishment of an environment in which he or she can continue learning or working with peace of mind.

6) Prohibition of retaliation and other disadvantageous treatment

The opposing party must not bully, retaliate, or otherwise give disadvantageous treatment to individuals who have consulted or petitioned regarding harassment. In the event that something like that did occur, strict action would be taken by Ritsumeikan, including disciplinary action.

7) Announcement of disciplinary action

As a rule, the details of disciplinary action, etc., shall be announced in accordance with the following criteria, while giving the maximum respect to the wishes of the victim.

Criteria for the Public Announcement of Harassment Cases at Affiliated Schools

Purpose	The purpose of announcing harassment cases that have occurred at Ritsumeikan’s affiliated schools (hereinafter “affiliated schools”) is to clarify Ritsumeikan’s social accountability as well as to encourage teaching staff and other staff members and related parties to take responsibility for harassment, and in an effort to maintain an appropriate educational and work environment at affiliated schools.
Targets of announcement	Harassment cases that have involved some type of action against the teaching staff or other staff members at affiliated schools shall be the targets of announcement.
Announcement contents	As a rule, an overview of the case, the action taken, the date of the action, and information related to the attributes of the individual against whom the action was taken, such as his or her affiliation, rank, and position, shall be released, to the extent that the individual cannot be identified. However, the name of the individual against whom the action was taken may be released for serious cases that have a particularly significant societal impact. As a rule, the consent of the victim shall be obtained before release of the name of the individual against whom action was taken.
Exclusion from announcement	In the event that there are concerns that the privacy, rights, or interests of the victim or related parties will clearly be violated, all or part of the announcement

	contents may be excluded from release.
Timing and method of announcement	The information shall be promptly released after the order for the action is given. However, information related to minor cases shall be released together at a fixed interval. As a rule, announcements shall be made by distributing materials to the press club, etc. Press conferences shall be held in the event of particularly serious cases.
Criteria for action related to harassment	The stipulations of the Work Regulations for Teaching Staff and Other Staff shall be applied.

VII Promotional, Educational, and Training Activities

In addition to solving problems of harassment, the Integrated Primary and Secondary Education Harassment Prevention Committee conducts activities to gather and provide information related to the prevention of harassment; public relations activities (leaflets, websites, etc.); guidance for harassment consultation staff members; activities to improve the capacity of harassment consultation staff members to provide assistance; and promotional, educational, and training activities, etc., regarding fundamental human rights for individuals involved with affiliated schools. Through this, the Committee will continue efforts in the future as well to create a campus environment that does not allow any type of harassment.

VIII Other

These Guidelines shall be implemented beginning on July 1, 2007. The Guidelines shall be reviewed and revised as necessary in light of the status of operation.

First Revision October 24, 2012
Second Revision September 11, 2013