
Choice and Affordability Fund Annual Report

2020

Association of Independent Schools of South Australia

Choice and Affordability Fund

Association of Independent Schools of South Australia – Annual Report 2020

Executive Summary

In 2020, the Association of Independent Schools of South Australia (AISSA) represented the interests of 104 schools, being the full cohort of Independent schools across the state. The AISSA welcomes the opportunity to report on the first six months of the 2020-21 Choice and Affordability Fund work plan. The AISSA work plan activity is underpinned by the agreed national priorities, and by the localised needs of member schools and their students. It is designed to strategically maximise funding for all schools, while enabling the Association to meet its obligations under the agreed national transition assistance priority to support Independent schools to transition to the Direct Measure of Income by 2029.

The first six months of activity saw the AISSA parallel the progression of agreed work plan priorities with responsiveness to the needs of schools and school communities, as a result of the impacts of the COVID-19 pandemic.

Implementation of the *Choice and affordability* priority focused on assisting schools with the development of business plans to ensure greater efficiencies of practices in light of state-wide economic challenges. Key preparatory activity saw the identification of an external consultant who will work alongside schools in 2021.

Supporting Independent schools to transition to the Direct Measure of Income funding arrangement by 2029 will be undertaken through a direct grant program, a critical element of the *Transition Assistance* priority. In 2020 key actions included determining the criteria for eligibility for transition assistance, along with the development of an equitable and fair formula for distributing direct grants to eligible schools from 2022. Regional transition assistance was provided to four regional schools through their Approved System Authority.

Two direct grant schemes were established as part of the *Special Circumstances* priority. The first scheme was established for schools experiencing financial distress directly as a result of COVID-19 and assisted schools to meet the costs of hygiene-related risk mitigation activities and protocols, as identified by the South Australian Department for Health. Application and assessment processes were established for the second scheme, for the purpose of short-term emergency assistance.

In 2020 initiatives commenced in support of *strengthening outcomes for schools and educationally disadvantaged schools and students*. A number of key initiatives were launched to build the capacity of school teams to improve outcomes for students. Preparatory activity was also undertaken to facilitate readiness for 2021, either as detailed in the work plan or as an adaption due to the impact of the COVID-19 pandemic. Revisiting of delivery forms saw many activities transition to online modes of learning, thus enabling rich educational discourse to continue. Through these mechanisms, projects including *Deep Learning and Teaching: Generating Energy and Pathways for Sustained Improvement* and *Learning and Accreditation through a Learner Profile* saw Independent school leadership teams connect with a range of academics outside of South Australia and also hear first-hand from experienced interstate Principals who had successfully implemented change initiatives in their respective schools. Longer-term projects such as the *Virtual World Builders Project* pivoted to re-shape project procedures so as to be able to progress in 2021 with rigorous COVID-19 related hygiene protocols in place.

Change of delivery mode also facilitated the implementation of external expertise to work with school Boards and leadership teams in the priority area of *Student wellbeing and support*. Complementary resources and materials were developed and shared with school leaders, in addition to being published on the AISSA website as an ongoing repository to assist educators manage student and staff wellbeing and mental health issues.

This comprehensive and intentional support for school education, to facilitate parental choice and affordability of Independent schools, would not have been possible without the financial assistance of the Australian Government.

Progress against your agreement and/or work plan

The first six months of the 18-month work plan saw critical preparatory work undertaken in addition to robust implementation of initiatives. The AISSA work plan outlines a number of national priority areas that will see the distribution of direct grants to schools. The development of funding eligibility criteria, application processes and acquittal mechanisms, as relevant to each priority, were completed. This will facilitate schools' judicious use of direct funding received, in accordance with national criteria and guidelines.

The six schools eligible for *Transition Assistance* funding as identified by the Australian Government, in addition to a small number of other Independent schools, are likely to meet the eligibility criteria developed. A total of \$100,000 will be available for this priority in 2021. The first round of grants, totalling \$139,720 was distributed to four regional schools, through their Approved System Authority and an acquittal was returned indicating that the grants were used in accordance with the Australian Government requirements.

Direct grants, totalling \$500,000 were provided to schools to assist with meeting the increased costs of maintaining a COVID-19 safe environment for staff and students, under the *Special Circumstances* priority. An application and assessment process for schools that meet the *Special Circumstances* funding criteria for short term emergency assistance, as outlined in the Choice and Affordability Guidelines, was developed.

Significant activity was completed to progress activities identified under the *Strengthening outcomes for schools and educationally disadvantaged schools and students* priority. Fourteen school leadership teams were introduced to a clear theory of action to lead, embed and sustain change in their communities, six of which will continue to transfer learning to their own contexts in 2021. A range of prototypes are being developed by schools involved in the *Learning and Accreditation through a Learner Profile* project that supports accreditation of a broad range of student learning. The impact of COVID19 on some initiatives saw the subsequent adaptation of a number of work plan activities. Whilst preparatory work was undertaken, some activities will only be fully implemented from 2021, including the *Elaborations Workshop Series 2021*, the *STEM conference* and the provision of training in the *Certificate IV in Education Support*. Exploratory activities were undertaken by the AISSA to gauge Independent sector stakeholder needs in the area of *School Industry Partnerships* for disadvantaged students. This feedback was compiled and used to inform the overview of skills and knowledge required to engage an expert in this field, working alongside schools from 2021.

Online modes of delivery saw Professor Donna Cross work with both school Boards and staff to share research and evidence about effective whole school approaches and school-based interventions that improve social and emotional wellbeing and minimise bullying. A key element of the *Student Wellbeing and Support* priority, 94% of participants, including Board members, reported a deeper understanding about the importance of student wellbeing and the impact of bullying.

The AISSA is committed to continuing to be responsive to the needs of Independent schools in South Australia and the implementation of initiatives and activities to progress national priority areas over the final 12 months of the current work plan.

The distribution of funding

Completed as *Attachment A – CAF Distribution Report* (Excel workbook), recording funding directly distributed to schools by school, centralised spending and a list of schools by priority that have accessed centralised support by priority.

NGRB Expenditure Profile

	2020 \$	2021 \$	2022 \$	2023 \$	2024 \$	2025 \$	2026 \$	2027 \$	2028 \$	2029 \$
Estimated expenditure	1,022,140	2,417,084	4,359,412	2,756,274	2,838,962	2,924,132	3,011,856	3,102,210	3,195,278	3,291,134

This expenditure profile includes \$1,502,450 carried over from 2020 (which comprises \$1,500,241 of unspent 2020 funds plus \$2,209 from ‘other income’).

The \$2,209 in other income was generated as part of the cross-sector collaboration Learning and Accreditation through a Learner Profile project (see page 9). The project costs were divided between AISSA and the two other participating parties. The amount of \$2,209 represents funds contributed by the two other parties in respect of one invoice paid in full by the AISSA.

Subsequent Work Plans will provide more detail in relation to how these carried over funds will be utilised, suffice to say that the estimated expenditure profile provides for future centralised initiatives to support member schools consistent with the Choice and Affordability Fund Guidelines and includes funds earmarked to directly support schools to transition successfully to the Direct Measure of Income funding arrangements.

Interest earned

	2020 \$
Interest earned	0

The bank account in which CAF funds were located had a zero per cent interest rate. Alternatives which may have attracted a small amount of interest were not considered appropriate in 2020 because of the desire to retain flexibility given the potential need to provide additional Special Circumstance Funding to member schools.

Activity Report

Relevant national/local priority:

a) Choice and affordability

In 2020, significant planning commenced for Business Development Planning, funded under the national priority *Choice and affordability*. The program is designed to engage external professional expertise to assist schools in progressing business development plans to enable them to streamline business practices, in light of the particular and compounding challenges facing the South Australian economy due to the closure of large manufacturing industries, drought, bushfires and most recently COVID-19. It aims to enhance the choice and affordability of Independent schools for South Australian families.

In 2020, centralised expenditure was used to identify and commence negotiations with a suitably experienced and qualified consultant to undertake the work with non-Lutheran Independent schools and to develop the criteria for access to the program. It was deemed critical that the consultant have both significant experience in the school setting along with requisite accounting skills and financial management expertise. Mr Paul Campey, Partner, Resolve Consulting, was identified as having the requisite skill set and experience to support schools with this initiative.

The impact of the COVID-19 pandemic necessitated an adjustment to the initial 2020-21 timeline with a decision taken to delay the commencement of the consultancy work until 2021. Key factors informing this decision included ongoing uncertainty regarding travel restrictions, State border closures and the impact of the significant risk management strategies that schools were required to put in place to enable them to remain open for face to face student learning. Centralised funding of \$71,900 was therefore forward committed for spending in 2021.

It is intended that the Business Development Planning program in 2021 will be open to all non-Lutheran schools across metropolitan, rural and regional areas, subject to them meeting established eligibility criteria. The AISSA will also use its local knowledge to liaise with specific schools that, within the eligibility parameters, may benefit from involvement in this initiative. Concurrently, professional expertise will be provided to support school leaders and school Boards to strategically navigate what are increasingly challenging times.

A separate strand of this initiative will be funded in 2021 for the Lutheran school system in South Australia, given the specific circumstances and governance arrangements of Lutheran systemic schools.

Relevant national/local priority:

b) Transition Assistance

In 2020, work commenced under the Business Development and Transition Assistance Program that aims to support South Australian Independent schools requiring transition support, as a result of the implementation of the Direct Measure of Income funding arrangements over 2020 to 2029, to successfully transition to the new measure by 2029. Under the Program, \$50,000 was committed to fund direct grants to eligible schools in both 2020 and 2021. However, in light of the pressures placed on schools by the COVID-19 pandemic it was deemed to be more prudent to carry forward the 2020 direct grant amount of \$50,000 to 2021 with a total of \$100,000 to be made available for direct grants in 2021.

The AISSA undertook a range of preliminary planning activities in 2021 including identifying potential eligibility criteria for access to the grant program and an initial list of schools likely to be eligible to meet the criteria to apply for the funding. The eligibility criteria will be finalised in 2021 and an application form and acquittal process developed. The six schools which have been identified by the Australian Government as eligible for assistance under the National Adjustment Assistance Fund (NAAF) for the period 2022- 2028 have been determined to meet the eligibility criteria to apply for funding under the program along with a small number of other Independent schools.

Specialist support was engaged to assist in the development of transition assistance eligibility criteria, as well as an equitable and fair formula for distributing direct grants to eligible schools from 2022 and other activities related to school operations including compliance with legislative requirements. A recruitment process was undertaken with the successful applicant commencing employment in October 2020. Funding for this position is supported by membership fees and other resources.

Four regional schools were identified by the Australian Government as eligible for regional transition assistance, all of which sit under one Approved System Authority. In accordance with the AISSA 2020-2021 workplan, and in light of the quantum of funding and the unique circumstances of each school, funding for 2020 was processed and paid by the AISSA to the Approved Authority, Lutheran Education SA, WA and NT, for onward payment to each school. The Approved Authority was able to determine the allocation for each eligible school, as per the agreed national criteria, with the funding fully expended in grants to the four schools. A formal agreement was developed along with an accountability process to ensure that funds are used in accordance with the Australian Government requirements and to process the grant distribution. The nationally agreed criteria will continue to be used as a threshold for eligibility in 2021.

Relevant national/local priority:

c) Special Circumstances

In 2020 a small grant program was made available under the *Special Circumstances* priority to South Australian Independent schools experiencing financial stress directly as a result of COVID-19. The grants were intended to assist schools with meeting the increased costs of maintaining a COVID-19 safe and hygienic environment for staff and students. Increased cleaning of indoor and outdoor school surfaces and playground equipment was identified by the South Australian Department of Health as one of the key risk mitigation strategies against the spread of COVID-19 in schools. These strategies were put in place to enable schools to remain open for face to face learning throughout the pandemic.

Centralised expenditure was used to develop an eligibility criteria and an application process, along with an equitable and fair formula for distributing the grants to eligible schools and to process grant payments. The application form required a declaration be signed by the Principal of the school, and witnessed, that the grant would be used toward the increased costs of maintaining a safe and hygienic environment for staff and students in light of the COVID-19 pandemic.

Ninety Independent schools, across metropolitan, regional and rural areas, applied to access the grants and all were deemed to meet the eligibility criteria. The formula developed to allocate grants to schools was based on school enrolment at the 2019 census and the actual increase in cleaning costs directly resulting from the COVID-19 pandemic. A maximum grant of \$10,000 was available with grants reduced where necessary to ensure no school received an amount greater than their additional costs of cleaning.

An acquittal process was undertaken with schools required to declare that they had fully acquitted the funding and that the grant funding was used toward the increased costs of maintaining a safe and hygienic environment for staff and students in light of the COVID-19 pandemic. Any unacquitted funds were required to be returned to AISSA. All schools fully acquitted the funding. A second grant program will be run in 2021.

In 2020, the AISSA also developed an application and assessment process for schools which meet the Special Circumstances funding criteria for short term emergency assistance as outlined in the Choice and Affordability Guidelines. The application form was based on the Department of Education, Skills and Employment (DESE) application form. No schools applied for funding in 2020. Under the 2020-2021 Workplan the AISSA will also provide Special Circumstances funding to schools in response to priority areas or natural disaster, including drought and bushfire, through establishing specific grant programs as required. No programs additional to the COVID-19 safety program were identified as needed in 2020.

Relevant national/local priority:

d) Strengthening outcomes for schools and educationally disadvantaged schools and students

In 2020 initiatives commenced in support of strengthening outcomes for schools and educationally disadvantaged schools and students. Key initiatives were launched to build the capacity of school teams and improve outcomes for students. Preparatory activity was also undertaken to facilitate readiness for 2021, either as detailed in the workplan, or as an adaptation due to the impact of the COVID-19 pandemic.

The *Deep Learning and Teaching: Generating Energy and Pathways for Sustained Improvement* project saw a partnership develop between the AISSA and Sydney-based 4C Transformative Learning. Whilst the formal commencement of this project was deferred to 2021 due to travel restrictions, the revised 2020 strategy focused on supporting schools to build foundational knowledge of the 4C Transformative Learning research base and to engage in preparatory activities. Two sessions provided insights into the theory underpinning this initiative, positing school transformation as a profound and ongoing process that can be achieved through attention to three interrelated cognitive, intrapersonal and interpersonal dispositions for learning and four pivotal ways of working: collaboration, communication, critical reflection and creativity (the 4C's). Participants were introduced to two interstate Principals whose respective schools have engaged in successful transformative change through referencing, implementing and embedding the 4C Transformative Learning approach. Fourteen Independent schools participated in these introductory sessions, with six formally committing to continued exploration and enactment of this work within their individual school contexts over the next two years.

The *Virtual World Builders Project* aims to engage and empower South Australian junior high school girls and students from disadvantaged backgrounds in STEM learning and careers. This project required significant re-scoping and rescheduling of activities and saw COVID-19 VR hygiene protocols developed to ensure that students could safely use project hardware without the danger of cross contamination, requiring a hardware/student ratio of 1:1 for the duration of the project. This 1:1 device ratio necessitated a reduction in the overall number of schools and classes involved. The pandemic also impacted on the participation of some schools, as travel to rural and remote schools to provide hardware, professional learning and mentoring was uncertain. The four showcase events were no longer feasible, due the risks associated with large numbers of staff and students from different schools congregating together. Key project activity included the selection and purchase of hardware and software, in addition to confirmation of the academic lead, Associate Professor Erica Southgate, University of Newcastle and industry partner Kingston Lee-Young, CEO VRTY Education through VR. Re-scoping of the project identified the participating student cohort in junior secondary Science classes from a co-educational outer metropolitan school from a lower socio-economic area. Professional learning was planned with the school leadership and teaching staff, for project commencement in 2021.

The *AISSA Educational Leaders STEM Conference 2021* will bring together teams from the three education sectors Early Years to Year 12, researchers and industry. 2020 saw the implementation of a pre-conference webinar series to build enthusiasm and interest in the conference and to ensure leaders and teachers were continually supported to implement quality learning experiences in STEM. Four webinars were presented that balanced theoretical perspectives from university academics with school implementation of contemporary practice, from the early years of schooling to secondary contexts. This series was well supported by Independent schools from across metropolitan, regional and remote areas.

Additionally, this opportunity was extended to the wider education community throughout Australia and saw participation from a diverse range of stakeholders including Education Service Australia (ESA) and universities. This series endures as a quality resource available to member schools on the AISSA website.

The *Learning and Accreditation through a Learner Profile* project is a cross-sector collaboration between the three school sectors in South Australia and the University of Melbourne's Assessment Research Centre. Face-to-face workshops pivoted to complete professional learning via video conferencing, supporting schools to explore methodologies in recognition of a broader range of student knowledge, skills and capacities. The survey and interview data of the five participating schools has indicated an overwhelming satisfaction with this project and has seen the development of a range of prototypes that recognise a wider set of student capabilities. In 2020, the progress of this project was shared at both the national *Learning Creates* alliance and the international *Global Education Leaders' Partnership (GELP)* forum and sees models of developmental assessment to inform a Learner Profile continuing to be developed in 2021.

Whilst the workshop series designed to provide teachers with an overview of the new *Aboriginal and Torres Strait Islander Early/ Primary/ Secondary Elaborations* as integrated into Science learning was postponed until 2021 due to COVID-19, key preliminary work was undertaken. This involved working with teachers from three schools to support the embedding of Aboriginal and Torres Strait Islander perspectives into learning designs, as well as liaising with the Aboriginal Elder who would co-present at the workshops.

In addition to the project commitments outlined in the workplan for 2020, significant activity was undertaken to progress initiatives that were scheduled to begin in 2021. One such initiative will be the provision of training in the Certificate IV in Education Support so that School Support Officers (SSOs) are well prepared to support student learning within a classroom context. This qualification will provide SSOs with the essential, practical and research-based techniques, strategies and skills required to effectively contribute to students' learning and development, including supporting students with diverse needs, including disability. Preparatory work on this project during the 2020 year included a lengthy negotiation with the external provider, TAFE SA to ensure that all contractual obligations were being fulfilled.

It is critical that students with an interest in vocational education and training who experience educational disadvantage are able to access high quality training in support of long-term educational and employment opportunities. Exploratory activities were undertaken by the AISSA to gauge Independent sector stakeholder needs in the area of *School Industry Partnerships* for disadvantaged students. This feedback was compiled and used to inform the overview of skills and knowledge required to engage an expert in this field, working alongside schools from 2021.

Relevant national/local priority:

e) Student wellbeing and support

Effective Whole School Approaches to Student Wellbeing

The promotion of a whole-of-school approach to student wellbeing is the shared responsibility of all stakeholders and requires intentional and carefully designed policies, curriculum, structures and practices. Effective wellbeing practice includes age-appropriate explicit teaching of social-emotional skills, support for positive behaviour and exploration of ways through which all students can meaningfully engage with opportunities to maximise their wellbeing. In addition, bullying prevention requires a whole-of-community response. The AISSA has worked in partnership with the Department for Education, Catholic Education, government departments and non-government organisations and the sharing of bullying prevention resources and collaboration is an important element of the statewide bullying prevention strategy.

Professor Donna Cross, although unable to travel to SA due to cross-border restrictions, presented to school Boards and leadership teams via webinar. She shared evidence focusing on student wellbeing, staff wellbeing, Principal wellbeing and also factors that disrupt that wellbeing; bullying being of paramount concern. This seminar examined the interplay between wellbeing and bullying; schools' cultural influences on establishing positive wellbeing in their communities; and policies, structures and processes that schools might implement to influence wellbeing and bullying prevention. This webinar was uploaded to YouTube and received a further 170 post-seminar views. Evaluative feedback indicated that this professional learning deepened all participants' understandings about both student wellbeing and the impact of bullying on individual students and the school community. In addition, 94% of participants reported a deepened understanding of effective school-based interventions.

To support schools during the uncertain times of COVID, complementary resources and materials were developed and shared with school leaders, in addition to being published on the AISSA website as an ongoing repository to assist educators manage student and staff wellbeing and mental health issues.

Summary of outcomes

Priority ¹	Activities/Initiatives	Budgeted ²	Spent ³	Description of outcome against targeted priority
Priority as per your agreement/work plan	Activities and initiatives as per your agreement/work plan	Expenditure on the activity managed centrally by the NGRB and funding distributed to schools.		Please provide a description of outcomes achieved against the targeted priorities and indicators of success in your agreement/work plan
Choice and Affordability	Business Development Planning	Centralised \$94,671	Centralised \$22,771	<ul style="list-style-type: none"> • Planning commenced for the Business Development planning program. • Identification of consultant to work directly with schools. • Consultancy work with schools was deferred until 2021 due to the COVID-19 pandemic.
		Distributed \$-	Distributed \$-	
Transition Assistance	Business Development and Transition Assistance Program	Centralised \$30,764	Centralised \$14,814	<ul style="list-style-type: none"> • Work commenced on the development of eligibility criteria. • Work commenced on the development of an equitable and fair formula for distributing direct grants to eligible schools. • 2020 round of grants was deferred to 2021.
		Distributed \$50,000	Distributed \$-	
	Regional Transition Assistance: Direct Grants	Centralised \$-	Centralised \$-	<ul style="list-style-type: none"> • First round of grant funds was distributed to participating schools in 2020 through a formal agreement between the AISSA and the Approved Authority for the participating schools. • The AISSA received an Acquittal from the Approved Authority certifying that the grants were used in accordance with the Australian Government requirements.
		Distributed \$139,720	Distributed \$139,720	
Special Circumstances	COVID-19: Direct Grant Program	Centralised \$29,894	Centralised \$12,269	<ul style="list-style-type: none"> • Eligibility criteria were developed for the Direct Grants to assist with meeting the increased costs of maintaining a COVID-19 safe
		Distributed \$500,000	Distributed \$500,000	

				<p>environment for staff and students.</p> <ul style="list-style-type: none"> • Direct grants were paid to schools which met the eligibility criteria in 2020. • Schools provided an acquittal for use of funds certifying that funds had been used appropriately.
Special Circumstances	Special Circumstances	Centralised \$-	Centralised \$-	<ul style="list-style-type: none"> • An application and assessment process for schools which meet the Special Circumstances funding criteria for short term emergency assistance as outlined in the Choice and Affordability Guidelines was developed.

Strengthening outcomes for schools and educationally disadvantaged schools and students	Deep Learning and Teaching: Generating Energy and Pathways for Sustained Improvement	Centralised \$18,697	Centralised \$27,139	<ul style="list-style-type: none"> • 14 school leadership teams were introduced to a clear theory of action to lead, embed and sustain change in their communities. • In 2021 school leadership teams from across six schools will begin to transfer the learning as relevant to their own context.
		Distributed \$-	Distributed \$-	
	Virtual World Builders Project	Centralised \$200,328	Centralised \$53,796	<p>6 month progress towards the success indicators:</p> <ul style="list-style-type: none"> • Project re-scoping and protocol development in response to the COVID-19 pandemic. • Confirmation of academic lead, industry partner and identification of participating schools.
		Distributed \$-	Distributed \$-	
	AISSA Educational Leaders STEM Conference 2021	Centralised \$-	Centralised \$55,110	<p>6 month progress towards the success indicators:</p> <ul style="list-style-type: none"> • A webinar series was provided in 2020 in preparation for the 2021 STEM conference and to ensure leaders and teachers were supported to implement quality learning experiences in STEM.
	Distributed \$-	Distributed \$-		

	Learning and Accreditation through a Learner Profile	Centralised \$106,842 Distributed \$-	Centralised \$73,309 Distributed \$-	<ul style="list-style-type: none"> 80% of schools have reported satisfaction with the project outcomes. Prototypes are being developed by schools that support accreditation of a broad range of student learning. The outcomes from the project have informed the current conversation regarding the recognition and accreditation of a broad range of learning, with this project discussed at both the national <i>Learning Creates Australia</i> alliance and the international <i>Global Education Leaders' Partnership</i> (GELP) forum.
	Science: New Australian Curriculum Aboriginal and Torres Strait Islander Early/ Primary/ Secondary Elaborations Workshop Series 2021	Centralised \$4,007 Distributed \$-	Centralised \$1,579 Distributed \$-	6 month progress towards the success indicators: <ul style="list-style-type: none"> Planning undertaken with schools regarding the 2021 presentations that will form part of the Elaborations Workshop Series.
	School Industry Partnership Program	Centralised \$121,799 Distributed \$-	Centralised \$9,090 Distributed \$-	6 month progress towards the success indicators: <ul style="list-style-type: none"> Completion of a sector needs analysis. Engagement of an expert in this field to work alongside schools from 2021.
Student Wellbeing and Support	Effective Whole School Approaches to Student Wellbeing	Centralised \$46,426	Centralised \$62,217	<ul style="list-style-type: none"> 94% of participants, including Board members, have reported a deeper understanding of the importance of student wellbeing and the impact of bullying.
		Distributed \$-	Distributed \$-	
Administrative costs ⁴		\$50,448	\$50,326	
TOTAL		\$1,393,595	\$1,022,140	