TRADE UNION FACILITIES POLICY		
Author (s) HR Advisor		
Corporate Lead	Director of Workforce	
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Executive summary

This policy sets out Leeds Community Healthcare NHS Trust's (the Trust) Trade Union Facilities Policy. The Trust recognise and encourage partnership working with elected local and regional Trade Unions.

This policy has been drafted to comply with statutory requirements and following both The Trade Union & Labour Relations (Consolidation) Act 1992 and ACAS guidance. This policy should be read together with any other relevant Trust policies, procedures and local guidance.

This policy has been developed in consultation with staff side and other key stakeholders.

This policy may be reviewed at the request of management or staffside by giving four weeks' written notice to the Director of Workforce which should include reasons for the review request.

Equality Analysis

Leeds Community Healthcare NHS Trust's vision is to provide the best possible care to every community. In support of the vision, with due regard to the Equality Act 2010 General Duty aims, Equality Analysis has been undertaken on this policy and any outcomes have been considered in the development of this policy.

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1.0 Introduction

Leeds Community Healthcare NHS Trust NHS Trust wishes to promote partnership working and encourage professional employee relations with recognised Trade Unions. To this end, the Trust will provide access to appropriate adequate facilities and reasonable time off to appropriately accredited representatives of recognised Trade Unions, subject to the terms of this policy.

2.0 Aims and Objectives

The Trade Union & Labour Relations (Consolidation) Act 1992 makes provision for employees to be given time off under various circumstances. The following sets out the terms agreed between the Trust and its recognised Trade Unions in this respect.

The provisions of this policy shall apply to accredited representatives, who have been duly elected or appointed in accordance with the rules of their Union.

It will be for the relevant trade unions to discuss and agree with the local employer an appropriate number of representatives. Local discussions should have regard to the size and location of the unions' membership and the expected workload associated with the role.

Subject to the needs of the service and adequate notification, accredited representatives should be permitted paid time off, including time to prepare for meetings and disseminate information and outcomes to members during working hours, to carry out duties. The employer will need to demonstrate why a representative cannot be released.

In the case of representatives who have a disability the Trust will provide appropriate adjustments which are mirrored in the representative's substantive post.

3.0 Definitions

3.1 Trade Union Duty

Reasonable time off for a paid act or task which is required by the role

3.2 Trade Union Activity

Reasonable time off for an unpaid act or task in relation to the role

3.3 Trade Union Facilities

The Trust will provide, where reasonably practicable, office accommodation and stationery for the use of local Trade Union representatives

4 Responsibilities

4.1 Joint responsibilities

The Trust is committed to working in partnership with local Trade Union Representatives to ensure employees are provided with consistent support through processes and procedures.

4.2 Trade Union responsibilities

A Trade Union Representative is responsible for:-

- Adhering to this policy
- Providing support to members, including formal procedures and processes
- Working in partnership with the Trust and representatives of the Trust
- Providing support during consultation processes and appeal hearings

4.3 Management responsibilities

- Ensuring local Trade Union Representatives receive reasonable time off
- Providing support to members

4.4 Workforce responsibilities

- Liaise with Trade Unions during Organisational Change processes
- To work in partnership with local Trade Union Representatives

5 Trade Union Duties

- **5.1** Employees who are accredited representatives of Trade Unions recognised by the Trust are entitled to reasonable paid time off to undertake Trade Union duties that are concerned with any aspect of collective bargaining and representation of individual members. Additionally, paid time off will be granted for attendance at JNCF, Staffside and other meetings which management request.
- **5.2** Accredited representatives are entitled to reasonable paid time off to prepare for meetings and disseminate information and outcomes to members during working hours.

Such duties may include:-

- (i) Participating in jointly agreed local partnership, consultative arrangements, including sub-groups or working groups, established under these arrangements.
- (ii) Consultation with management on specific issues, for example, on proposed / review policies, service or employment changes or developments.
- (iii) Meetings with members regarding a consultation process with management.
- (iv) Meetings with other representatives or with full time officers of recognised Trade Unions on matters which are concerned with employee relations within the Trust.
- (v) Meetings with members who are the subject of investigation or potential action under the Trust's policies relating to, for example, disciplinary, grievance, sickness absence, managing performance and bullying and harassment.
- (vi) Any other training appropriate to the role
- (vii) Performance of duties as a Learning Representative.
- (viii) Performance of duties as a Health & Safety Representative, including inspections and investigations.
- (ix) Attendance at official functions (e.g. Employment Tribunals, Appeals Committees, etc.)
- (x) Meetings to discuss urgent matters relating to the workforce with the Organisation
- (xi) Meetings with representatives for a collective purpose, relevant to employee relations within the Trust.

6. Trade Union Activities

- **6.1** Employees who are accredited representatives of Trade Unions recognised by the Trust are entitled to reasonable unpaid time off to undertake activities are those which are concerned with the organisation and running of the Trade Union locally and participation in national issues relating to the Trade Union.
- 6.2 Such activities may include:
 - (i) Area, regional or national meetings of the Trade Union, where the business of the Trade Union is under discussion.
 - Meetings of official policy making bodies such as the executive committee, annual conference or regional union meetings. For attendance at regional meetings/national conferences refer to the Protocol at Appendix 1
 - (iii) Recruitment and retention of new members.
 - (iv) Informing / consulting members (formal consultation will be paid time).
 - (v) Voting in properly conducted non-postal ballots on employee relations and at local Trade Union elections
 - (vi) Meetings to discuss branch Trade Union business or arrangements including branch meetings themselves.

- (vii) Accredited representatives who work part time, shifts or night duty will be treated equitably and will receive time off for actual hours spent on trade union activities during their working time on an hour for hour basis.
- (viii) Learning and development events
- (ix) Attending mentorship / supervision time with officers

7. Time Off and Payment for Duties And Activities Of Representatives

- 7.1 The Trade Union and Labour Relations (Consolidation) Act 1992 allows reasonable paid time off for a representative to carry out their duties Paid time off is to enable the representative to carry out their duties concerning any appropriate matter(s) which arise(s) between employees and management. It is not desirable or practicable to be prescriptive about the amount or frequency of time off for representatives. It will inevitably vary according to local factors.
- **7.2** In all cases the amount of time off must be reasonable. This can however only be defined in relation to the individual circumstances. Managers will therefore need to consider the purpose for and circumstances in which paid time is being sought, together with the needs of the service, considering the representative's role in respect of service delivery and the requirements of the post.
- 7.3 Paid time off for duties will therefore normally be granted subject to:
 - (i) The overriding operational requirements of the Trust to meet its obligations to service users. The primary function of the Trust is to provide and maintain healthcare and associated services. This obligation should not be hindered or adversely affected by the granting of time off. Representatives employed part time or on shift work face particular problems of effective representation and communication, and in such cases may request to adjust or re-arrange their work commitments accordingly. Such variations are expected to be infrequent and shall be at the discretion of the manager and always subject to the exigencies of the service.
 - (ii) The provision of reasonable notice of the request for time off by the representative to their manager. This is to allow sufficient time for the manager to make alternative arrangements for the representative's work (usually by redirection of the work or provision of cover).
 - (iii) The provision by the representative of sufficient information to enable the manager to make a decision.
- 7.4 A record of time off should be kept by the manager and the Trade Union representative. The Trade Union representative is also required to submit details of this time to the Staffside secretary on an at least quarterly basis.
- **7.5** Where a representative is rostered to work and requests time off to undertake Trade Union duties payment will be made for agreed time off to undertake these duties, as though the representative was at work doing their normal job.

Wherever practicable, the representative will return to work at the completion of their trade union duties

- **7.6** There is no statutory requirement to pay for time off where the duty is carried out at a time when the representative would not otherwise have been at work. No payment will be made for Trade Union duties when the representative is not required to work, unless the representative works atypical hours, such as night shifts, but needs to perform representative duties outside of their normal working hours. In such cases they should be granted the appropriate time off in lieu, on an hour for hour basis.
- **7.7** If a representative undertakes Trade Union duties at times when they are not required by their manager to be in work, time so spent will not attract payment. Exceptions will be made in the case of duties related to meetings requested and arranged by management, where another representative from the same Trade Union is not available and where the line manager's and / or Service Manager agreement is given in advance, to time off in lieu or payment in respect of those duties.
- **7.8** Time off for all Trade Union activities (as opposed to duties, as listed above) will be unpaid except for activities as agreed under the Protocol at Appendix 1
- **7.9** A representative should not leave their job without their manager's express permission. Such permission will not be unreasonably withheld by the manager who, additionally, should not use the requirements of the service merely as a device for restricting representatives in performing their recognised Trade Union duties and activities.
- **7.10** Reasonable travelling time will be given in relation to the performance of Trade Union duties and activities, within contracted hours of work. Where however representatives undertaking such activities travel outside their contracted working hours no time off in lieu or payment will accrue.

8. Learning Representatives

- 8.1 To qualify for paid time off, to undertake the function of a Learning Representative, the representative must be certified by the Trade Union to have received sufficient training to carry this role
- **8.2** It is the responsibility of the Trade Union to inform the Trust, giving reasonable notice, in writing that the employee will be undertaking relevant training to enable them to perform this role and also advise when the training has been completed.
- **8.3** Following sufficient notice and agreement with their manager, Learning Representatives will be granted reasonable time off to prepare to carry out any of the above activities, in this capacity.

- **8.4** To satisfy the requirements in respect of reasonable paid time off, the Learning Representative must be competent in one or more of the following areas of activity, relevant to the role:
 - (i) Analysing learning or training needs for example, being able to understand the different methods of identifying learning interests or needs; being able to effectively identify and record individual member's learning needs or being able to draw up a plan to meet identified learning requirements.
 - (ii) Providing information and advice about learning or training matters for example, the development of communication and interviewing skills; knowledge of available opportunities, to enable them to provide accurate information about learning opportunities within and outside of the Trust; the ability to direct individual members to other sources of advice and guidance if additional support is required.
 - (iii) Arranging and supporting learning and training for example, obtaining and providing information on learning opportunities, supporting and encouraging members to access these opportunities and to help develop and improve local learning opportunities.
 - (iv) Promoting the value of learning and training for example, understanding the current initiatives for the development of learning and skills in the workplace, promoting the value of learning to members and working with the Trust to meeting the learning and skills needs of both individuals and the organisation.
 - (i) The Trust has well established training and development programmes within its Service Lines. Any Learning Representatives should liaise with the relevant Training staff, to ensure that their respective training activities complement one another and that the scope for duplication is minimised.

9. Health and Safety Representatives

- **9.1** The Safety Representatives and the Safety Committee Regulations 1977 provides a legal entitlement for trades union appointed safety representatives to have paid from their normal work to carry out their functions and to undergo training. This may include:
 - Engaging with organisations and empowering staff to access and use information and advice appropriately to raise awareness of health and safety issues.
 - (ii) Link with union colleagues and employers to support health and safety initiatives in the workplace
 - (iii) Act on behalf of unions to support, influence and promote policies and campaigns around Health and Safety
 - (iv) Represent and negotiate on behalf of members' collective health and safety needs
 - (v) Be a spokesperson for members and assist other representative colleagues on health and safety issues.

- (vi) Support and assist in the development of a positive workplace culture around health and safety, wellbeing and welfare including workplace stress safe staffing levels healthy working lives and the ageing population.
- (vii) Access and analyse information relating to the health safety wellbeing and welfare of members in the workplace.
- (viii) Develop partnership working between unions and other stakeholders at all levels to champion positive health and safety practice.
- (ix) Promote the value of health and safety

10. Training for Trade Union Representatives

- **10.1** Subject to the general conditions described above, representatives will be permitted to take reasonable paid time off during normal working hours for the purpose of undertaking training relevant to their employee relations duties.
- **10.2** Each representative will normally undergo basic training as soon as possible after his/her election or appointment. Further relevant training could be undertaken as necessary in the light of, for example, changes in the procedural framework, relevant legislation or the role of individual representatives.
- **10.3** The implications of this section will apply no less favourably to shift or part-time workers.
- **10.4** When training takes place over a weekend then the Trade Union representative should seek prior approval with reasonable notice, for time off in lieu will be made to the senior manager of the service. Consideration will be given as to whether the training course is core training for the representative and supports the needs of the Trust. It may be necessary to provide details of the course programme.
- **10.5** The following specific conditions will also apply:
 - The training must be approved by the TUC or the Trade Union concerned, and attendance must be supported by the Trade Union.
 - Release for training will be with the permission of management, which will not be unreasonably withheld, and application should be normally at least four weeks prior to the commencement of the course. A copy of the training course details (e.g. training objectives/outcomes) *must* accompany all applications, unless it is a standard course for which the details have previously been provided.
 - Normally, not more than one accredited representative from the same department will be released at any one time, however the release of more than one representative may be requested and agreement reached as determined by the needs of the service.
 - All fees and expenses associated with the training will be the responsibility of the Trade Union concerned.

11. Facilities for Recognised Trade Union Representatives

As far as is reasonably practicable the Trust will make available to representatives, facilities which are appropriate for them to function effectively.

11.1 Accommodation for Meetings etc.

Subject to the permission of management, which will not be unreasonably withheld, Trade Union business meetings may be held on the Trust premises without charge.

Wherever possible, management will also provide accommodation for training sessions organised by Trade Unions. Requests should normally be made at least two weeks before the meeting.

11.2 Office Accommodation

Wherever possible within the constraints of existing resources the Trust accepts a commitment to provide office accommodation equipped with desk, chairs, IT, telephone and record-storage facilities at the major units for the exclusive use of accredited representatives / Trade Union officers. Such accommodation will be for the shared use of accredited representatives of all Trade Unions. Where the volume of business of Trade Unions justifies it, arrangements for separate accommodation may, where feasible, be made.

Subject to the permission of management, which will not be unreasonably withheld, accredited representatives will be allowed the use of an existing office on all sites for purposes such as confidential interviews with members or other accredited representatives. A reasonable amount of notice for the use of rooms is expected to be given, particularly on small sites. Where possible an office will be sought where significant union duties are undertaken on non-Trust premises (e.g. on the Acute Trusts sites).

11.3 Office Facilities

To enable Trade Union representatives to discharge their duties and subject to the permission of management, which will not be unreasonably withheld, accredited representatives will be afforded:

- Reasonable access to a telephone/fax/e-mail, for the purposes of making and receiving confidential calls, photocopying and postal facilities as and when necessary.
- Use of internal mail system.

- Access to photocopying/duplicating facilities.
 Access to the internet will be available where it is feasible for a line to be connected to the office.
- These facilities are provided for the normal business of trade union representatives in relation to the Trust. Where facilities are used for legitimate trade union purposes beyond this (e.g. where a representative holds a regional or national office) charges may be applied for photocopying, post etc. All facilities are provided on the understanding they will not be misused, and any abuse of facilities may constitute a disciplinary offence.
- Access to stationery

11.4 Notice boards/Intranet

It is recognised that Trade Unions will need to communicate with their members through the display of notices; therefore space for notices will be made available on all premises owned or used by the Trust. Notice boards, use of the intranet will be used for the legitimate purposes of the Trade Unions. The arrangements for the display of notices etc. on each site will be determined individually with the manager concerned.

11.5 Access to Documents

Accredited representatives shall be entitled, on request, to access to Agenda for Change and local employee relations agreements at any reasonable time. Specific periodic requests for information on staff (e.g. details of starters and leavers), will be supplied where available. Additionally, accredited representatives will be entitled, on request, to information relevant to collective bargaining in accordance with the ACAS Code of Practice "Disclosure of Information to Trade Unions for Collective Bargaining Purposes" and Section 181 (General Duties on Employers to Disclose Information) Trade Union and Labour Relations Consolidation Act 1992.

11.6 Charges for Refreshments etc.

Where facilities are afforded in respect of trade union activities, any costs incurred will be charged to the Trade Union. Tea, coffee and water will not normally be charged for.

12. Dispute Resolution

12.1 Any grievance in relation to any of the matters covered by these arrangements and raised by an employee, should be pursued by the employee through the Trust's 'Grievance Procedure'.

Where management has reason to believe that an individual member or accredited representative is abusing the facilities etc. covered by these arrangements:

- Informal efforts will be made to confirm and, where appropriate, correct the situation through discussion with the individual.
- Where necessary, and before any further action is taken, attempts will be made to resolve the matter through discussion with the full-time official of the Trade Union concerned.
- **12.2** Accredited representatives will be subject to all the provisions of their Terms and Conditions of Employment in the same way as any other employee. But accredited representatives shall not be dismissed or otherwise penalised in any way whatsoever, for carrying out their function as representatives in accordance with the rules of the Trade Union and provisions of these arrangements, or for any omission in the performance of their duties whilst absent from work with permission from management.

13. No Detriment

The Trust does not discriminate on any purpose including membership of a trade union

14. Amendment or Termination of Agreement

Either side may submit proposals in order to amend this agreement. Such proposals will be in writing to the sides concerned will be the subject of joint discussions.

15. Risk Assessments

Risks identified with the implementation of this policy (and procedure) have been assessed and mitigated as far as possible, in line with the Trusts risk appetite. Should any further risks be identified following implementation, these will be assessed and consideration will be given to an urgent review/revision of the policy (and procedure).

Monitoring Compliance and Effectiveness

Explain how you will monitor compliance with, and effectiveness of, the policy, this may include auditing. Give clarity on who is leading with what and how actions will be implemented.

Complete the table below which needs inserting into your policy

Minimum requirement to be monitored / audited	Process for monitoring / audit	Lead for the monitoring/audit process	Frequency of monitoring / auditing	Lead for reviewing results	Lead for developing / reviewing action plan	Lead for monitoring action plan

Approval and Ratification process

The policy has been approved by the appropriate body and ratified by SMT on behalf of the Board.

This information above needs to be inserted into your policy:

Dissemination and Implementation

Dissemination of this policy will be via the Clinical and Corporate Policy Group/Work force policies to services and made available to staff via the intranet. Implementation will require:

- Operational Directors/ Heads of Service/General Managers to ensure staff have access to this policy and understand their responsibilities for implementing it into practice
- The Quality and Professional Development and workforce Department will provide appropriate support and advice to staff on the implementation of this policy

As the author you must confirm any specific instructions for disseminating your policy e.g. does the policy require a link through to Leeds Health Pathways?

Additionally you may want to explain how the information in your policy will be conveyed to staff and how the policy will be implemented e.g. by a launch event, raising at meetings, induction sessions. Also, include any training requirements for staff.

Review arrangements

This policy will be reviewed in three years following ratification by the author or sooner if there is a local or national requirement.

Insert this sentence into your policy.

Associated documents

Provide a list of documents that are associated and of relevance to the policy.

References

It is essential that policies are supported by robust evidence and this is assisted by providing suitable references. This includes any internal documents, particularly other policies.

References

The Trade Union & Labour Relations (Consolidation) Act 1992 Safety Committee Regulations 1977 ACAS Agenda for Change Terms & Conditions **Beachcroft Solicitors** Staffside Policy Group LNC HR **Recording Facility Time Guidelines** Managing Attendance Policy **Disciplinary Policy** Managing Concerns with Performance Policy Bullying and Harassment Policy **Grievance Policy** Flexible Working Policy **Special Leave Policy**

LEEDS COMMUNITY HEALTHCARE NHS TRUST PROTOCOL FOR APPLYING AND ATTENDANCE BY LOCAL TRADE UNION REPRESENTATIVES AT TRADE UNION CONFERENCES, NATIONAL AND REGIONAL MEETINGS

1. INTRODUCTION

The release of staff to undertake their trade union duties and activities is outlined in the Trust's Trade Union Facilities Agreement. There is no statutory requirement to pay representatives for time off in relation to their undertaking activities by taking part in regional or national meetings or conferences where policy is made or the business of the Trade Union is discussed.

It is recognised however that local union representatives will, from time to time, seek to attend regional or national meetings or conferences. This protocol has been produced to assist managers and local union representatives by identifying the process and considerations that need to be undertaken by representatives when seeking time off to attend such events. It should be read in conjunction with the above policy.

2. PROCEDURE

By the start of each *Trust financial year*, a designated representative of each of the constituent unions recognised by the Trust for negotiation and consultative purposes, should provide a schedule of all known and identified conferences, national or regional meetings for which staff attendance is requested to the Director of Workforce. This will then be made available to the appropriate Service Director / Manager and local Human Resources lead as soon as possible. It is acknowledged that representatives may not always be able to identify all meetings at the start of the year.

When a Local Trade Union representative wishes to attend a conference, national or regional meeting, they should make a written request to their manager, copied to the Director of Workforce, at the earliest possible date. This is to recognise that the manager may need to seek to provide cover for the period the representative will be away from work. Normally it will be expected that such requests are made at least six weeks before the commencement of the period of time off requested.

Where there are extenuating circumstances such as the late withdrawal of another delegate, for not being able to request time off earlier, then requests may be considered up to two weeks prior to the event. Whilst all requests will be considered and looked at on an individual basis not applying within two weeks may in itself lead to the request being unsuccessful.

When the request is made the Local Trade Union representative must provide their manager and the Director of Workforce with an outline of the details of the conference, national or regional meeting. The dates and period they are seeking to be off work must be included.

The Director of Workforce who will then liaise with the local manager, the Trade Union Branch Secretary (or equivalent) to agree what, if any, time off should be granted. All requests will be retained for monitoring and review purposes by the Director of Workforce to ensure that they comply with this protocol and the Trade Union Facilities Agreement.

Where it is concluded following these discussions that a particular conference, national or regional meeting can for the purposes of this Protocol, attract paid leave, and the representative can be released, then time off with pay will normally be granted to that one delegate only. However in exceptional circumstances additional representatives can be discussed with the Director of Workforce, OD and System Development. Other delegates or other attendees may apply for annual leave or unpaid leave to attend. It will be for the individual Trade Union to nominate who will be their delegate.

Where the Local Trade Union does not agree with a decision to not release the delegate on paid leave they shall be given the opportunity to meet personally with the Director of Workforce and the appropriate Service Director / Manager to outline why they disagree with the decision. If no agreement can be reached the Grievance Procedure can be utilised.

It is expected that, given the Trust's support in providing time off for these purposes, Trade Union representatives will minimise the time they need to be away from work. Any travel should wherever possible be undertaken outside of normal contracted hours of work. Travel undertaken outside of normal contracted hours of work will not attract time off in lieu or payment.

For the avoidance of doubt this protocol applies to all legally recognised and accredited Trade Union representatives. It applies to all managers within the Trust who have Trade Union representatives in their department and will be applied equitably, irrespective of Service line, workplace or base.

3. REVIEW

This protocol will be reviewed to check on its effectiveness annually by the Director of Workforce in partnership with Trade Unions, at the Local Staff Partnership Forum.

4. DELEGATION

The Director or Director of Workforce may delegate their responsibilities under this Annex to a suitable deputy.

Policy Consultation Responses

Complete this template when receiving comments at various draft stages of the Policy.

Responder (including job titles and organisation)	Version, Comment and Date	Response from Author

Policy Consultation Process

Title of Document	Trade Union Facilities Policy
Author (s)	Polly Long
New / Revised Document	
Lists of persons involved in developing the policy	Polly Long
List of persons involved in the consultation process	

Appendix: 2 – Authors Guide for writing/Review and Approval of Procedural Documents

	Trade Union Facilities Policy	Yes/No/ Unsure	Comments
1.	TITLE		
	Is the title clear and unambiguous?		
	Is it clear whether the document is a guideline,		
	policy, protocol or standard?		
2.	RATIONALE		
	Are there defined reasons for document		
	development?		
3.	REVIEW PROCESS Is the method described in brief?		
	Are individuals involved in the development identified?		
	Has a rational attempt been made to ensure the relevant expertise has been used?		
	Is there evidence of a consultation with stakeholders and users?		
4.	CONTENT		
	Is the objective of the document clear?		
	Is the target population clear and unambiguous?		
	Are the intended outcomes described?		
	Are the statements clear and unambiguous?		
5.	EVIDENCE BASE		
	Is the type of evidence to support the document identified explicitly?		
	Are key references cited?		
	Are the references cited in full?		
	Are all supporting documents referenced?		
6.	APPROVAL		
	Has the named Director had sight of the document?		
	Does the document identify which committee/ group will approve it?		
	If applicable have the joint Human Resources/staff side committee (or equivalent) approved the document?		
7.	DISSEMINATION and IMPLEMENTATION		
	Is there an outline/plan to identify how this will be done?		
	Does the plan include the necessary		
	training/support to ensure compliance?		
8.	DOCUMENT CONTROL Does the document identify where it will be		
	held?		
	Have archiving arrangements for superseded		

	documen	ts being addressed?		
9.	PROCES	S to MONITOR COMPLIANCE and		
	EFFECT	VENESS		
	Are there	measurable standards or KPI's to		
	support tl	ne monitoring compliance with and		
	effectiver	ness of the document?		
	Is there a	plan to review or audit compliance		
	with the c	locument?		
10.	REVIEW	DATE		
	Is the rev	iew date identified?		
		quency identified? Recommend every		
		or sooner if required.		
		acceptable time frame?		
11.	-	LRESPONIBLITY for the		
	DOCUME			
		who will be responsible for co-		
		g the dissemination, implementation		
		w of the document?		
12.		and CONTENT		
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