24 GB
Disciplinary, Conduct and Capability Policy

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<tr>
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<td>Governing Body</td>
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<tr>
<td>Name of author/originator</td>
<td>Toni-Dee Downer, Senior HR Manager</td>
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<tr>
<td>Owner (director)</td>
<td>Elaine Newton, Director of Governance and Compliance</td>
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<tr>
<td>Date of approval</td>
<td>April 2017</td>
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<tr>
<td>Date of last review</td>
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<td>Review to be completed by</td>
<td>April 2019</td>
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### Version control sheet

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<td>Robert Champion</td>
<td>Updated</td>
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Equality statement

NHS Guildford and Waverley aims to design and implement services, policies and measures that meet the diverse needs of our service, population and workforce, ensuring that none are placed at a disadvantage over others. We take into account the Human Rights Act 1998 and promote equal opportunities for all. This document has been assessed to ensure that no employee receives less favourable treatment on the protected characteristics of their age, disability, sex (gender), gender reassignment, sexual orientation, marriage and civil partnership, race, religion or belief, pregnancy and maternity.

Members of staff, volunteers or members of the public may request assistance with this policy if they have particular needs. If the member of staff has language difficulties and difficulty in understanding this policy, the use of an interpreter will be considered.

We embrace the four staff pledges in the NHS Constitution. This policy is consistent with these pledges.

See next page for an Equality Analysis of this policy.
Equality Analysis

Equality analysis is a way of considering the effect on different groups protected from discrimination by the Equality Act, such as people of different ages. There are two reasons for this:

- to consider if there are any unintended consequences for some groups
- to consider if the policy will be fully effective for all target groups

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Who is intended to follow this policy? Explain the aim of the policy as applied to this group.

This policy applies to all employees. It does not apply to non-employed resources. This policy should be used to deal in relation to any conduct and capability of staff. When dealing with issues of poor performance and sub-standard work, managers need to recognise that a distinction can often be made between negligence, a lack of ability, ill health or disability.

Who is intended to benefit from this policy? Explain the aim of the policy as applied to this group.

This policy exists to help and encourage employees to act responsibly and to adhere to acceptable codes of conduct. The CCG’s aim is to ensure any breach of CCG rules and standards is dealt with in a manner that is consistent and fair. This procedure does not form part of any employee’s contract of employment and it may be amended at any time. The CCG reserves the right, depending on the seriousness of the matter, to start or proceed to any stage of this procedure.

1. Evidence considered. What data or other information have you used to evaluate if this policy is likely to have a positive or an adverse impact upon protected groups when implemented?
   - Demographic data
   - The results of consultations or recent surveys
   - Comparison between your policies and functions and similar policies and functions in other public bodies
   - Analysis of complaints of discrimination (none received)
   - Recommendations of inspection and audit reports

2. Consultation. Have you consulted people from protected groups? What were their views?

The review of this policy has been consulted with Staff Partnership Forum and is in...
accordance with NHS terms and conditions of employment which is a nationally agreed terms of appointment for NHS staff; therefore this is compliant to all equality requirements.

3. Promoting equality. Does this policy have a positive impact on equality? What evidence is there to support this? Could it do more?
Positive effect. As detailed in the Equality Statement, policies can be made available in different formats for CCG staff with different communication needs, on a case by case basis.

4. Identifying the adverse impact of policies
Identify any issues in the policy where equality characteristics require consideration for either those abiding by the policy or those the policy is aimed to benefit, based upon your research.

a) People from different age groups:
No adverse impact predicted from this policy.

b) Disabled people:
No adverse impact predicted from this policy.

c) Women and men:
No adverse impact predicted from this policy.

d) Religious people or those with strongly held philosophical beliefs:
No adverse impact predicted from this policy.

e) Black and minority ethnic (BME) people:
No adverse impact predicted from this policy.

f) Transgender people:
No adverse impact predicted from this policy.

g) Lesbians, gay men and bisexual people:
No adverse impact predicted from this policy.

h) Women who are pregnant or on maternity leave:
No adverse impact predicted from this policy.

i) People who are married or in a civil partnership:
No adverse impact predicted from this policy.

5. Monitoring How will you monitor the impact of the policy on protected groups?
Appeals and complaints made will be brought to the attention of the Human Resources team and reported to the Governing Body
1. **Introduction and Policy Objective**

1.1. NHS Guildford and Waverley CCG aims to recruit and retain well-qualified and skilled employees in order to deliver the best service possible to our service users. The CCG also recognises its responsibility to ensure that employees are aware of the capability and conduct standards required in employment.

1.2. Whilst the CCG has rigorous recruitment and performance management appraisal systems, it also recognises that there may be occasions when employees are not capable to perform at the expected standard for the job.

1.3. These issues can usually be dealt with through the normal supervision and Appraisal processes. However, the CCG also recognises that there will be occasions when, despite such support and training, no improvement takes place. This procedure outlines the process to be used in such circumstances.

2. **Core Standards**

2.1. This policy exists to help and encourage employees to act responsibly and to adhere to acceptable codes of conduct. The CCG’s aim is to ensure any breach of CCG rules and standards is dealt with in a manner that is consistent and fair. This procedure does not form part of any employee’s contract of employment and it may be amended at any time. The CCG reserves the right, depending on the seriousness of the matter, to start or proceed to any stage of this procedure.

2.2. Nothing in this procedure is intended to interfere with the normal processes of management whereby managers allocate work, monitor day to day operation and performance, highlight excellent or poor quality work, and provide coaching and support to employees. Much of this activity will be carried out in conjunction with a routine performance management process, which should identify any aspects of performance shortfall.

2.3. Line Managers should maintain notes of difficulties encountered by employees, assistance given and remedial action. This is necessary in case formal action is needed at a later stage.

2.4. This procedure may be implemented at any stage if the employee’s alleged misconduct is found to warrant such action. An employee may be dismissed for a first breach for example in the case of gross misconduct or where the employee has yet to complete their probationary period.

2.5. The CCG’s aim is to deal with disciplinary and capability matters sensitively, confidentially and with due respect for the privacy of any individuals involved. All employees must treat their situation as confidential and any information
communicated to them in connection with a matter which is subject to this procedure.

3. **Scope**

3.1. This procedure applies to all employees. It does not apply to non-employed resources.

3.2. This policy is used to deal in relation to any conduct and capability of staff. When dealing with issues of poor performance and sub-standard work, managers need to recognise that a distinction can often be made between negligence, a lack of ability, ill health or disability.

3.3. The process outlined within this policy should clearly outline the procedure required to enable Managers to clearly distinguish between standards of behaviour, conduct and negligence and poor performance to identify the right policy and follow the appropriate course of action/sanction.

4. **Definitions**

4.1 **Misconduct**

4.1.1. The following list, which is not exhaustive, provides examples of offences that are normally regarded as misconduct:

   a) Minor breaches of the CCG’s policies.
   b) Minor breaches of the employee’s contract.
   c) Damage to, or unauthorised use of, the CCG’s property.
   d) Poor timekeeping.
   e) Time wasting.
   f) Unauthorised absence from work.
   g) Excessive personal e-mail or internet usage.
   h) Smoking in no-smoking areas.

4.2 **Gross misconduct**

4.2.1 The following list, which is not exhaustive, provides examples of offences that are normally regarded as gross misconduct:

   a) Theft or attempted theft, either from the CCG, employees or service-users.
   b) Deliberate falsification of CCG documents.
   c) Unauthorised removal of or deliberate damage to property.
   d) Assault, provoking or being involved in violent behaviour or abusive language.
e) Persistent refusal to obey a lawful or reasonable instruction or a serious act of insubordination.

f) Being under the influence of drink or non-medically prescribed drugs.

g) Reckless behaviour which puts the safety of a work colleague or others at risk.

h) Disability, racial or sexual abuse, bullying, harassment or other discriminatory or offensive conduct.

i) Causing loss, damage or injury through gross negligence, serious incompetence or dereliction of duties.

j) Unauthorised use or disclosure of confidential information.

k) Serious misuse of information technology and systems, including unauthorised use of e-mail and unauthorised entry to computer records.

l) Breach of any applicable professional codes of conduct or failure to renew professional registration where such registration is required to fulfil contracted duties.

m) Serious act which breaks the mutual trust and confidence or which brings or is likely to bring the CCG into disrepute.

n) Accepting a gift or money from a service user or CCG’s suppliers.

o) Accepting bribes or other secret payments.

p) Making untrue allegations in bad faith against a colleague.

q) Inappropriate use of social networking sites that may include posting statements or personal opinions about the CCG, its business, customers, patients, service users or staff.

r) Conviction of a criminal offence that in the CCG’s opinion may affect their reputation or its relationships with its staff, service users or public, or otherwise affects the employee’s suitability to continue working for the CCG.

4.2.2 Whilst gross misconduct will usually relate to the CCG's business, circumstances may also occur when conduct outside of the employee’s employment will be treated as gross misconduct. This may be because of the employee’s position or duties, the need to maintain mutual trust and confidence or the need to protect the CCG's reputation.
5. Roles and Responsibilities

5.1 The Governing Body and Committees

5.1.1 The Guildford and Waverley CCG Governing Body is responsible for ensuring that sufficient resources are provided to support the requirements and application of the people management policies across the CCG and that compliance with the necessary legislation and professional conduct is maintained; monitoring the application of policies and outcomes, for equality.

5.1.2 GWCCG Governing Body is responsible for approving the policy and procedure and leading the development of a culture that embraces dignity and respect for all.

5.1.3 The Remuneration Committee will review and approve any recommended changes or updates to this policy biennially, to be ratified by the Governing Body.

5.2 Managers

5.2.1 Managers are responsible for:

   a) Maintaining discipline within the organisation and ensuring employees are aware of the standards concerning conduct and capability at work.

   b) Implementing disciplinary procedures in line with the guidelines set out in this policy.

   c) Seeking advice from HR or Senior Manager in advance of any potential case of dismissal.

   d) Ensuring that all employees have regular feedback regarding their performance and for ensuring realistic and measurable standards of performance are set and explained carefully to employees.

   e) Ensuring that accurate and timely records are maintained of all conversations and meetings relating to conduct, capability or performance, including the saving of email conversations pertinent to the case.

   f) Establishing and judging the standard of performance demonstrated by the employees they manage and taking the appropriate action.

   g) Ensuring this policy is adhered to when dealing with employees who do not meet the required performance and capability level for their role.

   h) At all times all employees will be treated with respect by being straightforward, direct and open with them.
5.3 Human Resources (HR)

5.3.1 HR is responsible for offering advice and guidance to Line Managers and for ensuring that the relevant documentation as outlined in this policy is recorded on the employee’s personnel file.

5.4 All Staff

5.4.1 Employees are responsible for:

a) Adhering to CCG standards of conduct, capability and performance at work.

b) Attending meetings held as part of the disciplinary process when requested to do so by management.

c) At all times we will treat people with respect by being straightforward, direct and open with them.

d) Performing to a satisfactory level and for highlighting to their Line Manager, any concerns they may have that could impact on their conduct, capability or performance at work.

6. Procedure

6.1 Initial Stage (Preliminary)

6.1.1 The first stage in dealing with poor job performance is to determine whether the matter is one of capability or conduct.

6.1.2 This can normally be ascertained by counselling/investigation.

6.1.3 Incapability is where an employee has received all necessary training but still cannot achieve a satisfactory level of performance through any fault of their own.

6.1.4 If, on the other hand, the employee fails to reach the required standard of performance as a result of misconduct, for example, carelessness, negligence or lack of application, then some form of disciplinary action will normally be appropriate and this will be treated under the Disciplinary Policy as misconduct or gross misconduct.

6.1.5 Line managers will make every effort to resolve many potential disciplinary issues informally with the employee during their normal course of work. Only where this fails to bring about the desired improvement or the failing is deemed so serious, formal disciplinary proceedings will be implemented.
6.1.6 Line managers and employees should raise and deal with issues promptly and should not unreasonably delay meetings, decisions or confirmation of those decisions.

6.2 Informal Stage

6.2.1 Although this policy is primarily concerned with the process to follow regarding formal disciplinary or capability action, it is important to stress the need to consider an informal approach for certain instances of poor conduct, capability or performance.

6.2.2 Dialogue, advice and discussion should be the most commonly adopted means of correcting and improving behaviour. It should be regarded as an important aspect of the manager’s role since it may assist in preventing the need for formal disciplinary action, or highlight at an early stage the need for training or further assistance.

6.2.3 An informal record should be kept of any discussions. If there are any conditions or standards expected of an individual, these should be confirmed in writing. If the infringement of the established standards of conduct, capability or performance persists, it may be necessary to raise the matter in a formal disciplinary hearing. In such circumstances, the notes from any informal discussions may be referred to.

6.3 Formal Stage

6.3.1 Investigation

6.3.1.1 The appropriate manager will decide who will be the investigating officer and who will be the hearing officer of any possible disciplinary hearing. All investigations will be carried out without reasonable delay to establish the facts of the case and to decide whether to proceed to the disciplinary hearing. The amount of investigation required will depend on the nature of the allegation and will vary from case to case. It may involve interviewing and taking statements from the employee and any witnesses, and/or reviewing relevant documents. Wherever possible, different people will carry out the investigation and the hearing. No disciplinary action will be taken against an individual until the case has been carefully investigated and a disciplinary hearing has taken place.
6.3.1.2 Following the investigation, if it is decided there is a disciplinary case to answer the employee will be notified in writing and the employee will be provided with copies of any written evidence, which may include any witness statements. This is also referred to and known as the management case.

6.3.2 The employees right to be accompanied

6.3.2.1 The employee has the right to be accompanied by a fellow worker, staff side or trade union representative at any disciplinary hearing at which a judgement may be made, or subsequent appeal. The representative must be an employee of the CCG, unless they are a Full Time Officer of a recognised trade union. In either case, the CCG may insist on them being certified by their union as being experienced or trained in accompanying employees at disciplinary hearings.

6.3.2.2 The choice of companion from the selection above is a matter for the employee, but the CCG reserves the right to refuse to accept a companion whose presence would undermine the disciplinary process. Please note that individual workers are not obliged to agree to accompany the employee. Companions will be given appropriate paid time off to allow them to accompany colleagues at a disciplinary hearing or appeal hearing.

6.3.2.3 At any hearing or appeal hearing, the employees chosen companion will be allowed to address the meeting, to support the summarisation of the employee’s case, respond on the employee’s behalf to any views expressed at the meeting and confer with the employee during the hearing. The employee’s companion does not however, have the right to answer questions on the employee’s behalf, address the hearing if the employee does not wish them to or prevent the CCG from explaining their case. If the employee’s chosen companion cannot attend on a proposed date, they can suggest another date that must suit everybody involved. The new date must be within 5 working days of the date originally proposed by the CCG and can only be extended by mutual agreement.

6.3.3 Conducting the hearing

6.3.3.1 A reasonable amount of time should be given to the employee in advance of a disciplinary hearing in order that they have time to prepare. Where possible this should be at least 3 working days unless the employee and the CCG agree otherwise.
6.3.3.2 At all formal hearings during the disciplinary process, the employee has the right to call witnesses. Where the employee intends to call relevant witnesses they should give advance notice that they intend to do this to the Hearing Officer and the employee will be responsible for requesting the attendance of witnesses. The manager representing the case also has the right to call witnesses and will advise the employee if they intend to do so.

6.3.3.3 At all hearings, before any decision or judgement is made, the parties should agree to adjourn whilst the panel considering the case review the information presented to them and consider their options. There is no time limit to this adjournment and if it is necessary to consider the case for longer than was originally allocated for the hearing, then all parties should agree to reconvene on another date, which should be as soon as possible.

6.3.4 Hearing Outcome

a) The employee will be informed in writing of the outcome of the hearing within 5 working days.

6.3.5 The disciplinary/capability formal outcomes

a) Stage One – Verbal Warning

The employee will be advised of the reason for their warning, that it is the first stage of the disciplinary procedure and of their right to appeal. The manager will make a note of the verbal warning and any agreed action plan, which will be kept on the employee’s personnel file. The warning will inform the individual that, if there is no satisfactory improvement in performance, conduct, or any concerns raised, further disciplinary action may be taken. This warning will usually lapse after 6 months, subject to satisfactory standards being maintained.

b) Stage Two – Formal Written Warning

If there is no improvement or if a further breach occurs, or if one act of misconduct is deemed serious enough, a written warning will be given to the employee. The manager will issue the warning, which will give details of the breach, the improvement required and the timescales for improvement. It will warn that action under stage three may be considered if there is no satisfactory improvement in conduct or any further breach and will
advise of their right to appeal. A copy of this warning will be placed on the employee’s file and will usually lapse after 6 months, subject to satisfactory standards being maintained.

c) Stage Three – Final Written Warning

If there is still a failure to improve conduct, capability or performance, or an act(s) of misconduct is deemed serious enough, a final written warning will be given to the employee. The warning will give details of the breach, will warn that dismissal may result if there is no satisfactory improvement within a given timescale or if there is repeated misconduct and will advise of their right to appeal. A copy of this final written warning will be kept on file but will lapse after 12 months, subject to satisfactory standards being maintained.

d) Stage Four – Dismissal

If there is still failure to improve or the CCG believes that the employee has committed gross misconduct, the employee may be dismissed. The employee will be provided as soon as is reasonably practicable or usually within 5 working days with a letter confirming the reasons for dismissal, the date on which their employment will terminate, any payments to which they may be entitled and their right of appeal.

e) Alternatives to dismissal

In some cases the CCG may at their discretion consider alternatives to dismissal. These will usually be accompanied by a final written warning.

6.4 Appeals

a) The employee has the right to appeal against any disciplinary action taken against them. An appeal must be made in writing within 5 working days of receipt of the letter stating the outcome of the disciplinary hearing and should clearly state the reasons for the appeal.

b) The appeal will be heard by an independent manager who has not been involved in the investigation or the hearing. An appeal hearing will be arranged at the earliest opportunity and the employee has the right to be accompanied. The CCG may adjourn the appeal hearing if it needs to carry out any further investigations in the light of any new points the employee has raised at the hearing.
c) An appeal may result in the removal of the disciplinary sanction; the imposition of a lesser sanction; or the confirmation of the original sanction. Following the appeal meeting, the employee will usually be informed of the outcome within 5 working days in writing. The outcome of this meeting will be final.

6.5 Suspension

6.5.1 There may be circumstances where an individual employee’s presence in the workplace may compromise routine business or any other management activity which may include investigations. It may also occur that an individual’s health or well-being may be compromised by remaining at work, or may be to the detriment of the health and well-being of others. In these circumstances it may be necessary to suspend the individual in accordance with the following process:

6.5.1.1 The employee is not permitted to enter CCG or related premises, or contact CCG or related employees without the express permission of the manager issuing the suspension.

6.5.1.2 The employee is required to make themselves available to the employer during their normal hours of work, or in the event of an irregular work pattern, during the CCG’s normal office hours. This should not be seen as a punitive measure, should under normal circumstances be on full pay and should be reviewed/rescinded as soon as is practicably possible. Whilst allegations of gross misconduct are under investigation it will be normal for the individual employee against whom the allegation has been made to be suspended from duties. In all cases, a letter will be issued to the employee outlining details of their suspension. If salary is paid during the period of suspension that will only be the case provided that the employee complies with all instructions issued. Should they fail to, or refuse to, attend/agree a date for the disciplinary investigation/hearing they may lose any payment of salary. The terms and conditions of suspension will still apply. Suspension is not to be regarded as a form of disciplinary action and will be for as short a period as practicably possible.

6.6 Criminal Charges

6.6.1 Where an employee’s conduct is the subject of a criminal investigation, charge or conviction the CCG will investigate the facts before deciding whether to take formal disciplinary action.
6.6.2 The CCG will not usually wait for the outcome of any prosecution before deciding what action, if any, to take. Where the employee is unable or has been advised not to attend a disciplinary hearing or say anything about a pending criminal matter, the CCG may have to take a decision based on the available evidence.

6.6.3 A criminal investigation, charge or conviction relating to conduct outside work may be treated as a disciplinary matter if the CCG considers that it is relevant to the employee’s employment.

6.7 New Starters Probationary Periods

6.7.1 All employees joining the CCG will be subject to a probationary period lasting from 3 months to 6 months and are informed of this in their appointment correspondence and during their Induction Training.

6.7.2 During this period, the Line Manager will meet with the employee at regular intervals to ensure the employee is being provided with the training and support required.

6.7.3 A review meeting will be held 3 months post appointment, and if required, extended up to a 6 month period. A Probation Review Meeting template should be completed by the line managers and given to HR once completed and signed by both the line manager and employee.

6.7.4 If, during the probationary period, the employee does not meet the required standards, the Line Manager may move to the formal process and dismiss the employee, with one week’s notice. In the case that this is a possible outcome, then any meeting called to discuss the matter and make a decision, will be held in the same format as a Disciplinary Hearing.

6.7.5 Employees still have the right to be accompanied at meetings/hearings and appeal any outcomes. In exceptional circumstances where there are no outstanding issues with conduct, but there are still issues surrounding work performance or capability, the CCG may decide to extend probationary periods for a fixed period of time to give further opportunity to reach the required standard of performance. If at the end of the extended period work has not reached an acceptable standard, employment may be terminated with one week’s notice. Advice should be sought from HR in such cases.
7. References

7.1 The following references have been used to ensure statutory and regulatory compliance:

7.1.1 Previous CCG Disciplinary Policy (April 2013-June 2015)
7.1.2 Equality Act 2010
7.1.3 NHS Employers
7.1.4 Employment Rights Act 1986
7.1.5 ACAS

8. Approval, ratification and review process

8.1 This policy will be subject to review every 2 years and at any stage at the request of either management or the consultative committee.
8.2 Human Resources will review this policy, with any recommendations or required changes being presented to the Staff Partnership Forum for consultation, the Remuneration Committee for approval and the Governing Body for ratification.
8.3 High level employee relations activity is reported to the Governing Body on a biannual basis and within the CCG publically published Annual Report.

9. Dissemination and implementation of the Policy

9.1 This document will be disseminated as follows:

a) Copies will be made available on the CCG's Intranet
b) The policy will be brought to the attention of all staff periodically through team brief and ebrief and monitored in line with normal assurance processes.
c) Awareness and understanding required on an annual basis for all staff through Appraisal and PDP discussions.
10. Appendix 1 Procedural Document Checklist for Approval

This must be completed and include an plan regarding how a policy will be implemented.

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<td>Yes</td>
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</tr>
<tr>
<td>Are the statements clear and unambiguous?</td>
<td>Yes</td>
<td></td>
</tr>
<tr>
<td>5. Evidence Base</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Is the type of evidence to support the document identified explicitly?</td>
<td>Yes</td>
<td></td>
</tr>
</tbody>
</table>
Procedural document checklist for approval

To be completed and attached to any document which guides practice when submitted to the appropriate committee for consideration and approval.

<table>
<thead>
<tr>
<th>Title of document being reviewed:</th>
<th>Yes/No/Unsure</th>
<th>Comments</th>
</tr>
</thead>
<tbody>
<tr>
<td>Are key references cited?</td>
<td>Yes</td>
<td></td>
</tr>
<tr>
<td>Are the references cited in full?</td>
<td>Yes</td>
<td></td>
</tr>
<tr>
<td>Are local/organisational supporting documents referenced?</td>
<td>Yes</td>
<td></td>
</tr>
</tbody>
</table>

6. Approval

Does the document identify which committee/group will approve it? Yes
If appropriate, has assurance been sought? Yes

7. Dissemination and Implementation

Is there an outline/plan to identify how this will be done? Yes
Does the plan include the necessary training/support to ensure compliance? Yes

8. Document Control

Does the document identify where it will be held? Yes
Have archiving arrangements for superseded documents been addressed? Unknown

9. Process for Monitoring Compliance

Are there measurable standards or KPIs to support monitoring compliance of the document? Yes
Is there a plan to review or audit compliance with the document? Yes

10. Review Date

Is the review date identified? Yes
Is the frequency of review identified? If so, is it acceptable? Yes

11. Overall Responsibility for the
### Procedural document checklist for approval

To be completed and attached to any document which guides practice when submitted to the appropriate committee for consideration and approval.

<table>
<thead>
<tr>
<th>Title of document being reviewed:</th>
<th>Yes/No/Unsure</th>
<th>Comments</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Is it clear who will be responsible for coordinating the dissemination, implementation and review of the documentation?</td>
<td>Yes</td>
<td></td>
</tr>
</tbody>
</table>

#### Director Approval

On approval, please sign and date it and forward to the chair of the committee/group where it will receive final approval.

<table>
<thead>
<tr>
<th>Name</th>
<th>Elaine Newton</th>
<th>Date</th>
</tr>
</thead>
<tbody>
<tr>
<td>Signature</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

#### Committee Approval

On approval, Chair to sign and date so it can then be forwarded to the person with responsibility for disseminating and implementing the document and the person who is responsible for maintaining the organisation’s database of approved documents.

<table>
<thead>
<tr>
<th>Name</th>
<th>Phelim Brady</th>
<th>Date</th>
</tr>
</thead>
<tbody>
<tr>
<td>Signature</td>
<td></td>
<td></td>
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</tbody>
</table>
11. Appendix 2 Compliance and Audit Table

<table>
<thead>
<tr>
<th>Criteria</th>
<th>Measurable</th>
<th>Frequency</th>
<th>Reporting to</th>
<th>Action Plan/ Monitoring</th>
</tr>
</thead>
<tbody>
<tr>
<td>Systems in place to ensure that Policy Owners/Authors follow the process outlined in this Guidance document</td>
<td>Policy review schedule proposed. Once approved, to be added to the Governing Board agenda as required</td>
<td>Biennial</td>
<td>Remuneration Committee</td>
<td>Monitoring</td>
</tr>
<tr>
<td>Systems in place for:</td>
<td></td>
<td>Biannually</td>
<td>Remuneration Committee/ Governing Body</td>
<td>HR Report</td>
</tr>
<tr>
<td>• Distribution (including version control)</td>
<td>Database showing status of HR current policies</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>• Monitoring of Implementation Plan</td>
<td>On internet/intranet site and referenced in Appraisals/PDP</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>• Timely review of all policies and procedures including equality analysis</td>
<td>Result of Audit</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>• Archiving/Retention/Destruction of policies</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Iterative development of Policy responding to comments received regarding the viability of policy implementation</td>
<td>Number of comments received</td>
<td>Biannually</td>
<td>Remuneration Committee/ Governing Body</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Implementation review with staff</td>
<td></td>
<td>following review with DGC</td>
<td>Action Plan to address comments</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>