



Policy on Gender Equality

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1.0 Introduction

The Trust is fully committed to equality of opportunity and promoting diversity. As such the Trust values all staff regardless of their gender and the Trust has a general duty to promote gender equality. Discrimination on the grounds of sex, pregnancy, maternity leave, gender reassignment, being married or being a civil partner is unlawful. This includes direct and indirect discrimination, victimisation, harassment and sexual harassment.

In society, boys and girls, men and women have their whole lives, including education, health, relationships and careers, built on gender roles and structures. This includes familiar gender stereotypes, such as boys taking up careers in construction and women taking up careers in nursing. Men and women who wish to enter non-traditional gender roles can experience discrimination and harassment.

The occupational segregation of men and women, which lead to career disadvantage and contribution to the equal pay gap, is still sometimes prevalent across our society.

The relevant legislation includes:

- The Equal Pay Act (1970)
- The Sex Discrimination Act (1975)
- The Sex Discrimination (Gender Reassignment) Regulations 1999
- The Employment Equality (Sex Discrimination) Regulations 2005
- The Employment Equality (Gender Equality Duty) 2007

1.1 What is the gender pay gap?

The gender pay gap in the UK is determined by calculating women's overall average pay as a percentage of men's. In 2008 according to the draft equality bill :

- Women who work full time are paid on average just 87.4% of men's hourly earnings
- Over two thirds of workers who receive the national minimum wage are women.

The three main factors, which have caused a gender pay gap in the UK, are:

- Discrimination, including unlawful pay discrimination
- Women still having more caring and family responsibilities. They may take part-time, poorly paid work and have interrupted career progression. Men may have less access to flexible working to share responsibilities.

- Occupational segregation, where there may be lower levels of pay than in those occupations dominated by men.

1.2 What rights do men and women have to equal pay?

The Equal Pay Act, (1970) gives a person the right to the same contractual pay and benefits of a person of the opposite sex in the same employment, or doing equivalent work or work of equal value (for example in skill, effort and decision-making). Men and women can have different levels of pay where there are 'genuine and material factors' for the level of pay, which is not attributable to direct or indirect sex discrimination.

2 Policy Statement

This document describes how the Trust aims to ensure that all individuals do not face discrimination on grounds of their gender and in order to do so the Trust needs to:

- Eliminate unlawful discrimination and harassment
- Promote equality of opportunity between men and women.
- Eliminate unlawful discrimination and harassment for people who intend to undergo, are undergoing or have undergone gender reassignment.

The new Employment Equality (Gender Equality Duty) Regulations came into force in April 2007, making it unlawful to discriminate at work on the grounds of gender. The regulations apply to all aspects of employment, including training, recruitment, promotion and dismissal. The Trust also recognises the existence of sexism in society, and through the implementation of relevant policies seeks to ensure that:

- Recruitment, progression and promotion are based entirely on relevant criteria, which do not include gender or transgender.
- Men and women are equally represented in the workforce and in levels of seniority, and there is no pay or progression gap between men and women.
- Men and women enjoy equal flexibility at work.
- All gender sensitive issues, are dealt with efficiently and timely.
- Provision is made for any member of staff who intends to undergo, is undergoing or has undergone gender reassignment.

The Policy on Improving Working Lives through Employee Friendly Policies and Procedures and Flexible Working Practices (QSSD 306) supports both men and women and recognises that all employees should enjoy a work life balance. This policy enables both men and women to maintain a healthy balance between their personal commitments and work, within the confines of the needs of the Trust to benefit patient care. Please refer to the above policy for further information

3 Scope of the policy

This policy applies to all staff working within the Trust, employees, visitors, patients, contractors, volunteers and staff from other organisations working on Trust premises.

This policy will apply to all Trust premises and all Trust personnel working in other premises, including any place where the occasion can be identified with either the requirements of the Trust, or with social events linked to the Trust.

4 Responsibilities

Directors/Managers are required to ensure that the policy is observed and applied consistently and fairly within their areas of responsibility.

The Director of Human Resources and Organisational Development has prime responsibility for the implementation of this policy and to ensure it is regularly monitored, reviewed and updated.

The Human Resources Department will be responsible for ensuring the implementation of this policy, advising managers, staff and trade unions on the content of this policy and its interpretation, providing training and advice to managers and staff on the operation of this policy, ensuring that all complaints of discrimination or harassment are dealt with in a fair and consistent manner, and that remedial action is taken where necessary.

Employees should ensure that their behaviour at work creates an environment which is free from any form of harassment, victimisation and all other forms of discrimination on the grounds of gender. Employees should be aware that if they are involved in discriminatory actions or practice they may not only face disciplinary action but also legal proceedings against themselves as individuals.

5 Guidance for Managers

The Trust recognises that it needs to attract potential staff from all sections of the community and create a workforce culture that embraces diversity and equality. In view of this the Trust has four main motivations:

- Reputation – the need to show the right corporate image to an increasingly discerning population of potential staff.

- Recruitment and Retention – the need to retain the employer of choice and maintain competitive advantage in an increasingly complex labour market
- Productivity – the need to retain and motivate the staff necessary for optimal performance
- Risk mitigation – the need to comply with a robust set of anti-discrimination laws and avoid the escalating costs of litigation

6. Definitions

The following are only intended to be used as a general guide for the purposes of interpreting and applying this document.

6.1 Gender – Gender explains differences in the way boys, girls, women and men adopt roles in our society and the ways we treat each other.

“The term ‘gender’ refers to the economic, social, political and cultural attributes and opportunities associated with being male and female. In most societies, men and women differ in the activities they undertake, in access and control of resources, and in participation in decision-making. In most societies women as a group have less access than men to resources, opportunities and decision making.”

United Nations Publications, (1995) Platform for Action Report on the Fourth World Conference on Women, Beijing,

6.2 Transgender - Transgender (or ‘trans’) is an umbrella term used to include many people whose lifestyles appear to conflict with the gender norms of society. A Transgender person is someone who has a deep conviction that their gender - whether they are a man or a woman - does not conform to the gender they were assigned at birth. This is known as Gender Dysphoria. Many transgender people wish to change their name and personal details and live as a member of the gender with which they identify. This may involve hormone therapy and surgery. This process is referred to as ‘gender reassignment’ or ‘transitioning’

6.3 Transsexualism - In the UK, clinical involvement for people expressing gender identities at variance from their physical gender was traditionally led by psychiatrists, with approaches that were originally grounded in theories about sexual deviancy and mental disorder. Nowadays it is recognized that being trans is not a mental illness. This policy will use the term transgender people, rather than transsexual, which has negative connotations.

6.4 Transition - A trans woman is someone who was registered as a male child and later undertakes the “transition” to presenting as a woman, because she wants to be regarded and treated as a woman. Similarly, a trans man is someone who was born with female anatomy and undertakes the transition to

present to the world as a man. This transition may well have been made in the face of family and social disapproval.

6.5 The Gender Reassignment Process - Diagnosis of Gender Dysphoria may take a matter of months or a period of years. Preliminary diagnosis is usually followed by psychological counselling, which may then be followed by hormone therapy. Typically after about six months the individual's physical appearance begins to change. It is at this point that the effects of hormone therapy are often irreversible. Transgender people will often change their social gender around this stage, although not necessarily their gender role at work. At some point the individual will want to start to live full time in their 'new' gender and their name and other records (such as their driving licence and passport) may be formally changed. If there are no delays (for example funding problems or waiting lists), the individual usually proceeds to one or more reassignment surgeries after one to two years of hormone therapy. The individual is expected to live and work in their new gender role for a period of at least one year prior to any irreversible surgical intervention. This period is often referred to as the 'real life experience' or 'real life test'. It should be noted that some transgender individuals never undergo gender reassignment surgery.

7 Discrimination on the grounds of Gender

7.1 Direct Discrimination

This takes place when a man or a woman is treated less favourably than a person of the opposite sex in comparable circumstances. For example treating a woman adversely because she is pregnant or is taking maternity leave.

The Sex Discrimination Act prohibits discrimination on the grounds that a person intends to undergo, is undergoing or has undergone gender reassignment. The legislation does not specify a minimum or maximum time that employers should allow for treatment. However, if the transsexual employee is absent for a long period, dismissal on medical grounds may be considered in the same way as for any other person who is medically unfit for work. However, individual rights under the Disability Discrimination Act 1995 must be considered where the individual has been diagnosed as suffering from 'Gender Dysphoria' or 'Gender Identity Disorder' and the condition is likely to last for more than twelve months, lasted twelve months or will remain with the individual for the rest of their life. The Trust must not, however, treat the person any less favourably than he or she treats, or would treat, a person absent due to illness or for some other reason where it would be reasonable to allow a similar amount of time off work.

7.2 Indirect Discrimination

This occurs when an organisation has recruitment and selection criteria, policies, procedures and other practices in place, which indirectly put people of a particular gender at a disadvantage when compared with others. Indirect discrimination is unlawful whether it is intentional or not. For example,

unnecessary height requirements are more likely to indirectly discriminate against women, as is refusal to allow flexible working.

7.3 Bullying and Harassment

If an employee is being bullied because of their gender, this constitutes harassment which is unlawful and would fall within direct discrimination. The Trust will not tolerate any form of harassment and will take disciplinary action against any perpetrators, in line with the Dignity at Work and Disciplinary Policies.

If an employee feels they are being bullied or harassed because of their gender they should refer to the Trust's Dignity at Work Policy (QSSD 316) for further guidance. Trained Dignity at Work Officers can provide confidential assistance to staff, the contact details of whom are available on the Trust's intranet site or from the Human Resources Department.

7.4 Victimisation

Individuals who make a complaint of being discriminated against on the grounds of their gender, and who are then subject to further detrimental treatment because of their complaint, whether by bullying and harassment, or other means such as demotion or transfer, are protected by victimization legislation. This also extends to cover any third party witnesses involved in a complaint.

8 Guidance on other Transgender Issues

8.1 Recruitment and Selection

If a transgender person applies for a vacancy within the Trust, managers must adhere to the following

- It should be made clear throughout the recruitment process and during employment, that the Trust will support members of trans staff and who may or may not be undergoing gender reassignment.
- The Trust will take a zero tolerance approach to discrimination, victimization or harassment of transgender staff or staff who are perceived to be transgender
- It is not appropriate to ask an applicant whether they are transgender. Although it may be the perception that a person is transgender, this may not be the case. They may have an intersex condition, or simply be a feminine man or a masculine woman.
- Any statement about the need for disclosure should be accompanied by the explicit reassurance that such information will be treated in absolute confidence, and that disclosure may not preclude eligibility for the post.

8.2 Criminal Records Bureau Checks

A member of staff having contact with patients is likely to have to apply for a Criminal Records Bureau disclosure. Part of this process involves a strict requirement for applicants to state all previous names and aliases. The last page of the form then has to be completed by the “Registered Person” who checks and verifies the contents and the evidence supplied. This means there can be some anxiety about the implications of this for transgender applicants and existing staff.

CRB applications need not be a problem for transgender people, however. There is a special process which they can follow in order to avoid problems they would otherwise face in complying with the requirement to make truthful statements. It should be stressed that this process does not weaken the effectiveness of the process in any way.

The detailed steps are explained on the Criminal Records Bureau web site. (www.crb.gov.uk)

Applicants may telephone the CRB on 0151 676 1509 or 0151 676 1570 to discuss this matter in confidence.

The process is as follows:

- Transgender applicants who apply for a CRB disclosure should first ring one of the above numbers to clarify anything they are not sure about and ensure that the CRB know they will be using the special provisions.
- They should then complete the form presented by their employer in the normal way, except that they need not complete details (or supply forms of evidence) that would expose their gender history to their employer.
- If they wish to leave out details that could “out” them then they should photocopy the form, ensuring they have a clear record of the application serial number
- The applicant should then immediately contact the CRB on one of the numbers above and notify them of the application number.
- The special security section of the CRB in Liverpool will then have the means to intercept the application forwarded by the employer. They will ask the applicant to supply the information needed to replace that which was omitted. This is then married up so that a rigorous criminal records check can be carried out in the same way as for any other applicant.
- Disclosures sent to the employee and their employer will not reveal the applicant’s former identity unless they have an offence or caution that has been recorded in that name in police records. In this case there is no way of avoiding the disclosure of that former identity to the employer.

- If the offence itself is not serious enough to preclude employment, reassurances should be given to the applicant / member of staff in the event that the offence itself is not serious enough to preclude employment.

8.3 Privacy

Under the Data Protection Act 1998, transgender status and gender reassignment would constitute 'sensitive data' for the purposes of the legislation. It can only be processed for certain specified reasons set out in the Act. The DPA applies whether they have obtained legal recognition or not. This means that it is good practice to treat such details with equal care whether an individual has a gender recognition certificate or not and whether they identify as transgender.

The Gender Reassignment Act 2004 made it a criminal offence in respect of disclosing a successful applicant's gender history to somebody else. Section 22 of the Gender Recognition Act says that:

It is an offence for a person who has acquired protected information in an official capacity to disclose the information to any other person.

"Protected information" means information which relates to a person who has made an application under the Gender Recognition Act. This covers both the fact of the application itself and, if the application was successful, the fact that the individual was previously of the opposite gender to the one in which they are now legally recognised.

A person acquires information in an "official capacity" if they are acting:

- As an employer, or prospective employer, of the person to whom the information relates or as a person employed by such an employer or prospective employer, or
- In the course of, or otherwise in connection with, the conduct of business or the supply of professional services.

It is not an offence to disclose information obtained in these circumstances if any of the following apply:

- The information does not enable the person to be identified
- The person has agreed to the disclosure of the information
- The person making the disclosure genuinely does not know or believe that a full gender recognition certificate has been issued
- The disclosure is in accordance with an order of a court or tribunal
- The disclosure is for the purpose of instituting proceedings before a court or tribunal
- The disclosure is for the purpose of preventing or investigating crime

- The disclosure is made to the Registrar General for England and Wales, the Registrar General for Scotland or the Registrar General for Northern Ireland
- The disclosure is made for the purposes of the social security system or a pension scheme
- The disclosure is in accordance with provisions made through regulations which the Secretary of State is permitted to make under the Act

Employees at all levels, who could learn about an individual's gender reassignment history in the course of their work, need to be very clear about the handling of this information. This could apply to:

- The information that can be entered into HR files where other staff might have access
- Discussion about an applicant's job interview
- The contents of occupational health reports
- Information that can be passed from one medical professional to another in the course of referral or when discussing a case
- Information stored in medical records where that data could be accessed by others

8.4 Record Keeping

Managers should ensure that all documents and employment details reflect the acquired gender of the individual. This will prevent any breach of confidentiality.

When documents have been seen and copies taken at the point of commencing employment (such as a birth certificate) then every effort should be made to replace those with equivalent documents in the new name and gender. The Data Protection Act limits the purposes for which information may be kept. When that information is no longer useful it must be destroyed. In some instances it is necessary to retain records relating to an individual's identity at birth, for example, for pension or insurance purposes prior to obtaining gender recognition. However, once a person has obtained a Gender Recognition Certificate these must be replaced with new details.

Access to records showing the change of name and any other details associated with the individual's transgender status (such as records for medical treatment) must be restricted to staff who need the information to do their work.

Once a person has obtained a Gender Recognition Certificate there must be no disclosure of this information. Breaches of confidentiality will be treated in the same manner as any other breach of confidentiality therefore staff may be subject to disciplinary action.

Transgender staff may choose voluntarily to disclose information at a secondary level, for example, when asking for support from a line manager. Again, strict confidentiality should be observed as further disclosure must not be made without the express permission of the individual.

It is not an offence to disclose protected information if the person cannot be identified or if they give their consent, however, such consent must not be forced.

8.5 Pensions

Women born before 1950 can claim their state pension at 60 years. Everyone born after April 1955 can receive their state pension at 65 years. Pension entitlements relate to a person's legal gender and these change only when a person obtains a Gender Recognition Certificate (GRC). The person concerned should inform their pension provider when they receive a GRC. Employees should contact their local HM Revenue and Customs Office of the NHS Pensions Agency for any advice.

9 Managing Staff Going Through Transition

Initially, managers (and any other person acting as a point of contact) should be made aware of this policy, in order to support the individual fully. Confirmation should be given to the employee about who will be the main point of contact to manage the transition from the Trust's perspective, and then to arrange a meeting with the employee to have a more detailed discussion to agree the process for handling the transition. Managers or the person acting as a point of contact, should contact the Equality and Diversity Team who can provide support and guidance for managers and staff on this issue.

9.1 First Meeting

At the first meeting the manager and employee should agree an action plan for managing the transition at work. This, along with any other notes of the meeting, must be kept strictly confidential in the individual's personnel file.

The action plan should include:

- Whether the employee is to stay in their current post or be redeployed (to be considered only at the employee's request)
- The expected timescale of the medical procedures and recovery, if known
- Time off required for medical treatment, if known
- The expected point or phase of change of name, personal details and social gender
- Whether the employee wishes to inform their line manager and colleagues themselves, or would prefer this to be done for them, and whether training or briefing of colleagues will be necessary

- The amendments that will need to be made to the Trust's records and systems
- Agreeing the point at which the individual will commence using single sex facilities in their new gender (such as toilets)
- The manager must make a referral to Occupational Health at this stage

After a person has successfully transitioned into their new gender role, or obtained a gender recognition certificate, it would not be appropriate to keep these records within the personnel file and they should be destroyed.

9.2 Informing Colleagues

It is good practice for managers to take responsibility for informing whoever needs to know, unless the individual going through the process would prefer to do this themselves. If so, the manager will just need to know when the disclosure is to take place and in what detail, so that they can agree and provide appropriate support. Managers should not inform colleagues or others that an employee is intending to undergo, or is undergoing, gender reassignment, without the individual's explicit consent.

It is never appropriate to inform colleagues or others that an employee has in the past undergone gender reassignment. This is a private matter since gender reassignment will have no bearing on that person's ability to do their job. Managers and staff must should bear in mind that if such an employee is in possession of a gender recognition certificate it is unlawful to disclose their transgender status without their consent.

Awareness raising of the transition should take place in two ways: general information about transgender issues and specific information to enable employees to understand the needs of the person involved. At the point of change of gender, it is common for transgender people to take a short time off work and return in their new name and gender role. This is often used as an opportunity to brief others. If someone has 'transitioned' prior to joining the Trust or a different department, the manager should not mention their trans history. Indeed, this could constitute a criminal offence in the case of someone who has obtained a gender recognition certificate.

9.3 Changing Spaces and Toilets

The use of toilets and other gendered facilities can occasionally be an issue in the workplace, particularly during the early stages of transition if colleagues were familiar with the employee in their former role. The usual point for starting to use opposite gender facilities will be the day the employee starts coming to work in their new gender role.

- As a temporary compromise measure, it may be appropriate to reserve one set of facilities for colleagues who may have strong objections to sharing facilities used by the trans employee, during the transition only.
- Where locker or shower facilities are open plan then it is good practice to review this and, at the least, provide some provision (e.g. curtained spaces) where staff need not be in a state of undress in the presence of others.
- If it is genuinely impossible to adapt locker or shower facilities in order to accommodate a pre-operative member of staff in a state of undress then this is one very limited example of an instance where the law permits an employer to make separate arrangements. It is highly unlikely that the employee concerned would object to this pre-operatively.
- It is not appropriate to request that a trans person to use disabled toilet facilities (unless they have a disability requiring this), neither is it permissible to expect disabled staff to accept such arrangements.
- Special arrangements must be time limited.
- Following gender reassignment surgery or legal recognition, trans people must be supported to use all facilities designated for other members of their acquired gender.
- It is never acceptable to require someone undergoing gender reassignment to use toilets or other facilities designated for members of their birth gender.

9.4 Public Facing Roles

An employee's gender transition may be unavoidably visible to the public, especially in the early stages of gender transition. Although many people cease being visibly different as transition progresses, there are others for whom it will continue to be a reality.

Some staff may request to move to another role temporarily during transition; however they cannot be required to do so by the Trust. If an employee makes such a request, managers must give due consideration to the request. Staff who intend to undergo, are undergoing or have undergone gender reassignment, are assured that they will be fully supported by the Trust when carrying out a public facing role.

10 Other Considerations

10.1 NHS North East Staff Networks – the Trust fully supports and participates in networks for staff who work within the NHS in the North East. The Equality and Diversity Department have responsibility for publicising the activities and work of the network.

10.2 Equality, Diversity and Human Rights Awareness Training - the Trust provides Equality, Diversity and Human Rights Awareness, and Dignity at Work Training to all staff as part of the Statutory and Mandatory training programme. Details of this are available from the Organisational Development Department. Equality, Diversity and Human Rights Awareness Training is also included in the Induction programme which all new staff attend. The above training includes gender equality awareness. Managers will receive awareness training on this policy as part of the wider Equality, Diversity and Human Rights training course for Managers.

10.3 Communication – It is good practice for all employees to understand transgender issues to avoid embarrassment or difficulties. This can be achieved through discussion with those concerned and providing training and general awareness sessions for staff.

11 Procedure for resolving issues relating to this policy

If an employee feels they are being bullied or harassed because of their gender they should refer to the Trust's Dignity at Work Policy (QSSD 316) for further guidance. Trained Dignity at Work Officers can provide confidential assistance to staff, the contact details of whom are available on the Trust's intranet site or from the Human Resources Department.

Should there be any other issues which relate to an employee's gender they should be raised and dealt with in accordance with the Trust's Grievance Procedure (QSSD 309).

12 Equality and Diversity Statement

The Trust is committed to providing equality of opportunity, not only in its employment practices but also in the services for which it is responsible. As such, this document has been screened, and if necessary an Equality Impact Assessment has been carried out on this document, to identify any potential discriminatory impact. If relevant, recommendations from the assessment have been incorporated into the document and have been considered by the approving committee. The Trust also values and respects the diversity of its employees and the communities it serves. In applying this policy, the Trust will have due regard for the need to:

- Eliminate unlawful discrimination
- Promote equality of opportunity
- Provide for good relations between people of diverse groups

For further information on this, please contact the Equality and Diversity Department.

13 Related documents

- Dignity at Work Policy (QSSD 316)
- Grievance Procedure (QSSD 309)
- Single Equality Scheme (QSSD 1507)
- Disciplinary Policy (QSSD 310)
- Improving Working Lives through Employee Friendly Policies and Procedures and Flexible Working Practices (QSSD 306)
- Confidentiality Code of Conduct Policy (QSSD 1302)

14 Consultation, Approval and Ratification Process

14.1 Consultation Process

This policy has been discussed with the Equality and Diversity Group which includes representatives from staff side and all directorates.

14.2 Policy Approval Process

This policy has been submitted to the Policy Review Group for approval.

14.3 Ratification Process

This policy has been approved by the Policy Review group and submitted to the JCC for ratification.

15 Dissemination and Implementation

15.1 Dissemination

Once ratified this policy will be added to the Document Quality Control System and added to the Intranet site to which all staff have access. Earlier versions of the document will be archived in the quality system.

The policy will also be added to the NetConsent system once it is implemented. This system will require staff to read the policy before allowing access to IT systems, and will record the date and time staff members have read the document.

15.2 Implementation of Procedural Documents

Information about this policy will be added to Statutory and Mandatory Training which is delivered to all staff on an annual basis.

16 Monitoring Compliance With This Policy

This policy will be reviewed twelve monthly or earlier if required by:

The Trust Board
The Assurance Committee

The effectiveness of the policy will be monitored on regular basis via the trusts Executive Team. Key performance indicators will be monitored by analysing data received from the HR team against agreed trust/national targets.
