

Transgender Equality Staff Policy

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Executive Summary

This policy, in line with the Equality Act 2010, aims to support those who are "proposing to undergo, are undergoing, or have undergone a process (or part of a process) of gender reassignment and provide them with practical information on workplace support. The policy applies to all Walton Centre employees, as well as volunteers and any other staff working within the Trust.

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1. Introduction

The Walton Centre NHS Foundation Trust is committed to promoting equality, diversity and good relations in everything it does, both as a provider of services and as an employer. The Trust is committed to equality of opportunity for Trans people throughout recruitment and employment, including supporting trans employees through any transitioning process. The Trust will not tolerate discrimination, victimisation or harassment on the basis of a person's gender identity, gender expression or Trans status. The Trust seeks to provide a supportive environment for Trans people employed or seeking employment and has a culture and environment where trans staff are able to thrive and are well supported during any process of transition.

Research undertaken in the areas of employment, health provision, social exclusion and hate crime indicates that Trans people experience disproportionate levels of discrimination, harassment and violence relative to the general population..

2. The Law

The Equality Act 2010 stipulates that gender reassignment is one of the nine protected characteristics. Act protects a person from discrimination, harassment and victimisation if they are "proposing to undergo, are undergoing, or have undergone a process (or part of a process) of gender reassignment". Trans people are legally protected from discrimination from the moment they propose to change their gender without the need for any medical supervision. People who need to take time off for gender reassignment should be given the same opportunities and not treated any less favourably in terms of training, promotion etc. Any employee treating a colleague less favourably may be personally liable for discrimination.

Gender Recognition Act 2004

The Gender Recognition Act 2004 enables people who have transitioned to be able to apply for a gender recognition certificate (GRC) This certificate allows them to be legally recognised as their acquired gender and enables them to obtain a birth certificate which states this. The information collected during this application is 'protected information' in accordance with the Act and it is a criminal offence to disclose this information without the individual's consent. The only exception to safeguarding the privacy of the individual are in 'certain specific circumstances' (for example where investigating a crime).

In order to apply for a GRC, the individual will need to be able to provide proof that they have lived in their acquired gender for two years or more along with a medical diagnosis of gender dysphoria. Many trans people choose not to apply for a GRC and it is not a legal requirement. An individual should never be asked if they have a GRC and to do so could be considered harassment.

3. Scope

This policy applies to all staff employed and working for the Walton Centre NHS Foundation Trust, including Trust volunteers, agency staff, lead employer staff and bank staff.

4. Definitions

- Definitions and terminology regarding transgender people are evolving. The terms below help to provide some guidance and identify most commonly used terms. Often, individuals will self-identify and will inform how they choose to describe themselves. This should be respected by their managers and colleagues. It is always better to ask someone how they would rather be addressed than assume.
- It is important that managers and colleagues are aware that using inappropriate language and terminology can cause offence and distress and undermines the Trust's efforts to create an inclusive workplace for transgender people.
- The Trust recognises that gender identity and sexual orientation are not interchangeable terms. Transgender people can be bisexual, gay, heterosexual or lesbian and so employees should not assume that a transgender colleague has a particular sexual orientation.
- **Acquired gender:** This is a legal term from the Gender Recognition Act 2004 to describe a person's gender after transitioning. Some people prefer the term 'affirmed gender'.
- **Assigned gender:** The gender given at birth based on physical appearance and genitalia
- **Cross dresser:** A person who chooses to wear clothes that are traditionally meant for a different gender. The term 'cross dresser' is preferred to 'transvestite' which is now considered offensive by some.
- **Gender dysphoria:** The severe unease and anxiety caused when a person's gender identity does not match their biological sex.
- **Gender expression:** How a person presents their gender to others, through behaviour and outward appearance.
- **Gender identity:** A person's internal perception of their gender and sense of self, whether that is male, female, neither or both. For transgender people, their gender identity does not match the gender they were assigned at birth.
- **Gender reassignment (or transitioning):** The process a person embarks on when they feel their assigned gender does not match their gender identity. Although this often involves medical and surgical involvement, this is not always the case. Gender reassignment is a protected characteristic under the Equality Act 2010.
- **Intersex:** An intersex person is one whose biological classification is difficult to ascertain due to ambiguous genitalia and/or sex chromosomal variations.
- **Non-binary:** An inclusive term to describe people whose gender identity is "fluid" and not exclusively male or female. A non-binary person may identify as neither male nor female or may feel that they embody elements of both genders, or that

they are something different. The term intersex is quite different to non-binary and these are not interchangeable.

- **Transgender (or trans):** An umbrella term used to describe the spectrum of people whose gender or gender identity differs from the gender assigned at birth. The term can also include people who are transsexual, cross dressers or non-binary.
- **Transsexual:** A transsexual person is defined in the Equality Act 2010 as someone who is "proposing to undergo, is undergoing or has undergone gender reassignment". Some transsexual people will have undergone medical or surgical gender reassignment however this is not necessary for them to be protected in law from discrimination.
- **Transphobia:** Negative feelings, attitudes or actions towards transgender people. This is often based on prejudice and misunderstanding and can manifest as fear, aversion, hatred or violence towards those whose gender identity does not match their assigned gender.

5. Roles and responsibilities

5.1. Trust Board

The Trust Board will ensure that all managers are accountable for the promotion and implementation of this policy. The Trust Board will monitor progress on equality, diversity and human rights issues and initiatives on a regular basis. It will ensure that all individuals are treated with dignity and respect.

5.2. Director of Workforce & Innovation

Responsible for monitoring the effectiveness of this policy and deciding on appropriate actions in response to any needs identified. This policy will be subject to monitoring, evaluation and review.

5.3. Human Resources

The HR Department has a specific responsibility to ensure the promotion of equality and inclusiveness through its employment practices, policies and procedures, and in supporting the application of this policy.

The Department will ensure that any member of staff who identifies as Trans within the recruitment process or as an employee will be treated fairly with complete dignity and respect. It will also ensure that this information is kept confidential and not disclosed without the individuals consent.

5.4. Trust Managers

All managers are responsible for ensuring the practical application of this policy. Managers should be aware that they will be expected to positively promote high equality standards, in line with the requirements of the Equality Act 2010. Managers should ensure that colleagues are informed about the employee's transition in a manner that best suits the employee, maintaining confidentiality at all times and supporting the employee in any way that is necessary and appropriate.

5.5. Staff

All individuals working with the Trust have a personal responsibility for the application of this policy. All staff should positively promote high equality standards and refrain from

any acts of discrimination. Staff also have a responsibility to report any discrimination, or any potentially discriminatory practice, to the attention of either their line manager, their HR contact, Staff Side representative, an Equality Champion or the Equality, Diversity and Inclusion Lead.

6. Recruitment and Selection

The Trust has an inclusive recruitment process to encourages applications from as wide a talent pool as possible and welcomes applications from trans individuals for all posts across the Trust, including volunteers.

Applicants are not required to disclose their trans status at any point in the recruitment process and this question should not be asked. If a candidate offers information regarding their gender identity, gender history or their intent to transition, they should be thanked for their candidness and the interviewer should explain that they will be supported whilst assuring that the disclosure will have no bearing on the outcome of the interview and will not be revealed outside the interview room.

The application process will require candidates to provide proof of identity to confirm the right to work in the UK. The trust is aware this can be a sensitive issue for trans applicants and will ensure that any documentation which reveals previous names and gender history is handled with sensitivity and, with the individual's permission, kept confidentially in line with data protection legislation. The same approach will apply where an applicant is required to present qualification certificates before a job offer is confirmed and the certificates are in the applicant's previous name.

If a role requires applicants to complete a DBS check, Trans applicants not wishing to reveal details of their previous identity can complete the form as usual then contact the DBS Sensitive Applications team on 0151 676 1452 or email sensitive@dbs.gsi.gov.uk with their application number. The team are able to prevent any previous identity showing on the DBS Certificate, **unless** the applicant has a conviction under their previous details in which case this will be disclosed. The applicant can withdraw their DBS form should it be found to reveal information they do not wish to have disclosed but they will not be able to progress in the job application or appointment as they will not have fulfilled all the pre-employment checks necessary.

It may sometimes be necessary for a trans person to disclose their previous identity in order for references from past employers to be obtained. In these cases, strict confidentiality should be applied. Where a reference request is received for an existing employee who has transitioned, The Trust will respect the employee's privacy and only respond using the employee's correct name and gender in the reference.

When the Trust requests a reference, we will make the request using the prospective employee's correct name and gender since transitioning. We will not mention previous names or gender identity, unless specifically asked to do so (in writing) by the trans person.

Where pensions, national insurance contributions or other benefits are dependent on legal sex, trans people will be advised of the different implications of whether they do or do not have a Gender Recognition Certificate (GRC).

Any applicants who enquire about the Trust's policy on recruiting transgender staff should be referred to this policy as well as to the Equality, Diversity and Human Rights Policy.

7. Supporting the Transition of staff in employment

The Trust understands that the process of transitioning is a complex and often extremely stressful time. Individuals may have taken years to reach the decision to transition and be fearful of possible ridicule or rejection. The Trust is committed to supporting these individuals and ensuring they are able to continue to work without fear of discrimination and harassment. The Trust will endeavour to help colleagues to have a better understanding of the transition process by inviting staff to lived experience education sessions

Once an employee has decided they wish to undergo transitioning, a point of contact should be agreed with the individual. The choice of contact should be up to the individual but is usually a member of HR Team (usually the Equality, Diversity and Inclusion Lead) or line manager. This contact will act as an advisor and answer any queries the individual has. This person will work with the employee to make an action plan for their transition. It is important that the action plan is tailored to the individual. A suggested action plan can be seen at appendix 1.

The following points should be considered:

- The date at which the individual will present at work in their new gender status and how this will be done
- How to handle a request for a temporary or permanent new job role whilst the employee is transitioning
- If and how colleagues are to be informed
- If and how third parties, such as clients, should be informed
- How to handle absence from work due to transitioning such as medical treatment and appointments
- Organising the changes required for personal records, emails, security badges etc
- Managing confidentiality
- Dress codes and/or uniforms.

The Trust is aware that the transition process can be long and complex process. Therefore, the action plan should be reviewed regularly with the individual and adjusted accordingly to reflect any changes.

8. Toilets, Changing Facilities, and other single sex facilities

The Trust will support a transgender employee's right to use the toilets and facilities appropriate to their gender from the point at which the individual declares that they are living their life fully in that gender. Staff toilet facilities at the Trust are mostly unisex to ensure that they cater adequately for the needs of all, including non-binary people, however, where it is currently impractical to move to unisex facilities HR will liaise with

any non-binary staff affected to identify and implement any reasonable adjustments or practicable support arrangements.

9. Dress Codes

The Trust will ensure flexibility in dress code is permitted to accommodate the process of transition or where a gender-specific mode of dress would be uncomfortable for the individual.

If the individual wears a uniform for their role, the Trust will ensure that their preferred gender specific uniform is available from the first day of transitioning.

10. Names and Pronouns

The Trust will respect the individual's change of name and ensure that all necessary steps are taken to implement this change. The Trust acknowledges that failure to make name and pronoun changes on the records of a transgender employee could constitute direct discrimination. The organisation will take all necessary steps to ensure that an individual's change of name is respected.

The Trust is aware that consistently misgendering and using a previous name could be seen as harassment and the individual would be dealt with appropriately.

11. Bullying and Harassment

The Trust adopts a zero-tolerance approach to harassment, bullying or victimisation. All staff, workers and volunteers have a duty and responsibility, not only to abide by non-discriminatory practice but to challenge discriminatory language, behaviour, or actions.

Examples of harassment against transgender people include:

- Asking if an individual has a GRC
- Verbal abuse – threats, name-calling, demeaning remarks about transgender people
- Refusing to use the preferred pronoun or using someone's pre-transition name
- Physical abuse or threatening behaviour
- Intrusive questioning regarding the transition process or someone's gender identity
- Excluding a transgender colleague from conversations or from social events
- Refusing to work with a person who has transitioned
- Displaying or circulating transphobic images and literature.

All employees are made aware of the organisation's dignity at work policy and the procedures in place for handling complaints of bullying and harassment. Any experience or witness of discrimination should be reported immediately to the appropriate manager, Freedom to Speak Up Guardian or HR contact/Equality, Diversity and Inclusion Lead.

The incident should also be reported on the Trust's DATIX system. Please also see the Trust's Grievance Policy and Dignity at Work Policy.

12. Changing Personal Records

Once an individual has made the Trust aware of the date on which the workplace transition begins they can ask for their personnel records to be updated to reflect their new identity. Both their line manager and the HR Department should create a new personnel file to ensure confidentiality. The manager and employee will work together to make sure nothing is missed. The changing of an individual's records is not dependent on having a Gender Recognition Certificate.

The personnel records for a trans employee will not make any reference to a previous name; records made prior to the name change will be updated to reflect the individual's new details. The personnel records for trans employees, referring to their previous gender which cannot be amended, and need to be retained (i.e. recruitment references), will be placed in a password protected file.

13. Changing Job Roles

An employee may wish to be redeployed following/during their transition on a temporary or permanent basis. The Trust will take all reasonable steps to support this wherever possible. The individual's HR advisor will identify any suitable alternative roles available; this will be dependent on the vacancies existing at the time of the individual's transition. A suitable alternative role describes a position of equal banding and for which the employee meets the essential criteria of the person specification. Lower banding positions can be considered should the individual request this. Higher banding positions would need to be applied for in the usual manner.

If the individual wishes, redeployment options can continue to be sought for a period of 4 months following their request.

A manager should not put pressure on an individual to change jobs or make assumptions about their capability or wishes.

14. Attendance at appointments and absence due to treatment and surgery

The Trust recognises that transitioning is not an illness but in order to record the leave it will be logged as sickness absence. Any absence from work due to medical appointments or treatment relating to transition will be dealt with in accordance with the Trust's Sickness Absence Policy. It is understood that this may include several repeated absences over a prolonged period, however this will be excluded from sickness triggers and should be discussed with the individual's HR support advisor and treated on an individual basis.

15. Support Mechanisms

- 15.1. Human Resources** – an appointed advisor from within the HR Department will provide support and put in place practical changes. This role will also support positive working relationships between the individual and wider team members if relevant.
- 15.2. Occupational Health** – a referral to Occupational Health may be considered by the individual, their manager or the human resources advisor for additional support or advice regarding the medical process of the transition. Managers may also need advice regarding the needs of the individual and on how to support changes that may need to be made within the team or work environment.
- 15.3. Staff Support** – the Staff Support Service offers support to all staff who work for the Trust. These services allow staff to talk to a counsellor who will be non-judgemental and impartial. This service is provided to help staff with both personal and work issues. Staff can access the service by calling: [REDACTED]
- 15.4. Lesbian, Gay, Bisexual and Transgender (LGBT) staff support network** – a regional support network for staff hosted in conjunction with several other Trusts across Merseyside. Further information can be found on the Equality and Diversity Intranet page.

16. The UK Gender Recognition Act and Certificate

The UK Gender Recognition Act (GRA) enables people aged over eighteen, who have gender dysphoria, to gain full legal recognition for the gender in which they live. Applications are considered by the gender Recognition Panel. Once a person receives a Gender Recognition Certificate (GRC), they achieve legal recognition in their acquired gender and are able to change their recorded sex on their birth certificate.

Under Section 22 of the Gender Recognition Act 2004 it is a criminal offence to disclose protected information regarding someone's trans status unless there is specific agreement to do so by the trans person or if it is required to prevent or investigate a crime.

17. Training

Transgender training is now included in our 'Building Rapport' programme aimed at managers; however this is limited at present and not yet included in E learning packages. We also offer lived experience educational sessions with a Trans speaker on an ad-hoc basis. The topic is covered broadly within the Trust's Equality, Diversity and Human Rights Training. Additional ad-hoc training can be arranged on request. For any further information please contact the Equality Diversity and Inclusion Lead at [REDACTED]

18. Monitoring

This policy will be reviewed every three years or in light of changes to legislation.

19. References

- Equality Act 2010
- Human Rights Act 1998
- Gender Recognition Act 2004

19.1. Supporting policies

- Equality, Diversity and Human Rights Policy
- Grievance Policy
- Dignity at Work Policy
- Disciplinary Policy
- Sickness Absence policy

Appendix 1 - Action Plan

<p>Are there any temporary or permanent changes / reasonable adjustments to the role which should be considered to support the employee?</p> <p>Considerations should include security aspects such as lone working, night working.</p>
<p>Is any time off required?</p> <p>If so how will this be managed?</p> <p>Consider flexible working methods, if appropriate</p>
<p>What will the employee's title and name be?</p> <p>What pronouns will be used? When will they start using these?</p> <p>Will there be any phasing?</p>
<p>Are there any dress codes to be considered?</p> <p>Are new uniforms needed?</p>
<p>If applicable, how will single sex working requirements be managed?</p>
<p>When and how should colleagues be informed of the transition?</p>
<p>Is there any guidance material which the employee wishes to share with managers and colleagues?</p>
<p>Should the employee encounter unacceptable behaviour towards them (colleagues or service users) who should this be reported to?</p>
<p>E Learning induction needs to be updated to include transgender information</p>
<p>Are there any other actions not covered by above?</p>
<p>Is there an agreed date for when this action plan will be disposed of in accordance with the requirements of the Data Protection Act 1998?</p>
<p>Actions agreed</p>
<p>Date of next meeting</p>

Who needs to know?

	Who will tell them?	When?	Date completed
Senior Manager			
HR Representative			
Line manager			

Team members			
Other colleagues			
Others (specify)			

Changes to records

	Who will do this?	When?	Date completed
HR Records			
Name badge			
IT systems including email			
Website			
Voicemail			
Internet/intranet address entry			
Union membership			
Pension scheme			
Certificates/awards			
Personal file and related data			
Other:			

Details of meetings

Date	Comments	Actions	Date of next meeting

Appendix 2 - Equality Impact Assessment (EIA) Form

This section must be completed at the development stage i.e. before ratification or approval. For further support please refer to the EIA Guidance on the Equality and Diversity section of the Intranet.

Part 1

1. Person(s) Responsible for Assessment: [REDACTED] 2. Contact Number: [REDACTED]
3. Department(s): HR Workforce and Innovation 4. Date of Assessment: DATE 19th January 2023
5. Name of the policy/procedure being assessed: Trans Equality Staff Support Policy
6. Is the policy new or existing?
New Existing
7. Who will be affected by the policy (*please tick all that apply*)?
Staff Patients Visitors Public
8. How will these groups/key stakeholders be consulted with? Consultation through Staff Partnership Committee, Local Negotiating Committee & Business Performance Committee
9. What is the main purpose of the policy? To provide employees who are considering undergoing, currently undergoing or have undergone any transitioning process with practical information and workplace support.
10. What are the benefits of the policy and how will these be measured?
11. Is the policy associated with any other policies, procedures, guidelines, projects or services? Equality, Diversity and Human Rights Policy, Grievance Policy, Dignity at Work Policy & Disciplinary Policy
12. What is the potential for discrimination or disproportionate treatment of any of the protected characteristics? *Please specify specifically who would be affected (e.g. patients with a hearing impairment or staff aged over 50). Please tick either positive, negative or no impact then explain in reasons and include any mitigation e.g. requiring applicants to apply for jobs online would be negative as there is potential disadvantage to individuals with learning difficulties or older people (detail this in the reason column with evidence) however applicants can ask for an offline application as an alternative (detail this in the mitigation column)*

Protected Characteristic	Positive Impact (benefit)	Negative (disadvantage or potential disadvantage)	No Impact	Reasons to support your decision and evidence sought	Mitigation/adjustments already put in place
Age	Not considered to be any impact	Not considered to be any impact		The policy aims to offer practical information on workplace support to all relevant staff. It is a positive measure and not subject to any age restrictions.	None required.
Sex	As above	As above		The policy aims to offer practical information on workplace support to all relevant staff. It is a positive measure and not subject to any restrictions for females or males.	As above
Race	As above	As above		The policy aims to offer practical information on workplace support to all relevant staff. It is a positive measure and not subject to any restrictions in terms of race or ethnicity.	As above
Religion or Belief	As above	As above		The policy aims to offer practical information on workplace support to all relevant staff. It is a positive measure and not subject to any restrictions in terms of religion or belief.	As above
Disability	As above	As above		The policy aims to offer practical information on workplace support to all relevant staff. It is a positive measure and not subject to any restrictions in terms of Disability.	As above
Sexual Orientation	As above	As above		The policy aims to offer practical information on workplace support to all relevant staff. It is a positive measure and not subject to any restrictions in terms of Sexual Orientation	None required.
Pregnancy/maternity	As above	As above		The policy aims to offer practical information on workplace support to all	None required.

				relevant staff. It is a positive measure and not subject to any restrictions in terms of pregnancy, maternity or paternity.	
Gender Reassignment	As above	As above		This Policy aims to provide Employees who are considering undergoing, currently undergoing or have undergone any transitioning process/ gender reassignment with practical information on workplace support.	None required.
Marriage & Civil Partnership	As above	As above		The policy aims to offer practical information on workplace support to all relevant staff. It is a positive measure and not subject to any restrictions in terms of pregnancy, maternity or paternity.	None required.
Other				The policy aims to offer practical information on workplace support to all relevant staff. It is a positive measure and not subject to any restrictions in relation to Carers.	None required.

If you have identified no negative impact for all please explain how you reached that decision and provide reference to any evidence (e.g. reviews undertaken, surveys, feedback, patient data etc.)

13. Does the policy raise any issues in relation to Human Rights as set out in the Human Rights Act 1998? *See Guidance for more details (NB if an absolute right is removed or affected the policy will need to be changed. If a limited or qualified right is removed or affected the decision needs to be proportional and legal).*

If you have identified negative impact for any of the above characteristics, and have not been able to identify any mitigation, you **MUST** complete Part 2, please see the full EIA document on the Equality and Diversity section of the Intranet and speak to Hannah Sumner, HR Manager or Clare Duckworth, Matron for further support.

Action	Lead	Timescales	Review Date

Declaration

I am satisfied this document/activity has been satisfactorily equality impact assessed and the outcome is:

No major change needed – EIA has not identified any potential for discrimination/adverse impact, or where it has this can be mitigated & all opportunities to promote equality have been taken



Adjust the policy – EIA has identified a need amend the policy in order to remove barriers or to better promote equality
You must ensure the policy has been amended before it can be ratified.



Adverse impact but continue with policy – EIA has identified an adverse impact but it is felt the policy cannot be amended.
You must complete Part 2 of the EIA before this policy can be ratified.



Stop and remove the policy – EIA has shown actual or potential unlawful discrimination and the policy has been removed



Name: [Redacted]

Date: 19/01/2023

Signed: [Redacted]

Appendix 3 - Policy approval checklist

The Transgender Policy is presented to the SPC/LNC for Approval.

In order for this policy to be approved, the reviewing group must confirm in table 1 below that the following criteria is included within the policy. Any policy which does not meet these criterion should not be submitted to an approving group/committee, the policy author must be asked to make the necessary changes prior to resubmission.

Policy review stage

Table 1

The reviewing group should ensure the following has been undertaken:	Approved?
The author has consulted relevant people as necessary including relevant service users and stakeholders.	Yes
The objectives and reasons for developing the documents are clearly stated in the minutes and have been considered by the reviewing group.	Yes
Duties and responsibilities are clearly defined and can be fulfilled within the relevant divisions and teams.	Yes
The policy fits within the wider organisational context and does not duplicate other documents.	Yes
An Equality Impact Assessment has been completed and approved by the HR Team.	Yes
A Training Needs Analysis has been undertaken (as applicable) and T&D have been consulted and support the implementation	Yes
The document clearly details how compliance will be monitored, by who and how often.	Yes
The timescale for reviewing the policy has been set and are realistic.	Yes
The reviewing group has signed off that the policy has met the requirements above.	Yes

Reviewing group chairs name:	Date:
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Policy approval stage

<input type="checkbox"/> The approving committee/group approves this policy. <input type="checkbox"/> The approving committee/group does not approve the policy.	
Actions to be taken by the policy author:	
Approving committee/group chairs name:	Date:

Translation Service

