Policy:
HR 008 Disabled Staff

Executive Director Lead	Director of People
Policy Owner	Head of Equality and Inclusion
Policy Author	Head of Equality and Inclusion

Document Type	Policy
Document Version Number	Version 3
Date of Approval PGG	October 2023
Date of Ratification	TBC
Ratified by	PEOPLE COMMITTEE
Date of Issue	October 2026
Date for Review	October 2026

Summary of policy

The purpose of this policy is to set out how we approach our aim of embracing a 'social model of disability', what we will do ensure that disabled staff, volunteers, and job applicants do not experience barriers to employment in our organisation and set out our policy on key areas relevant to disabled staff and potential employees.

Target audience	All staff and potential employees

Keywords	Disability; Staff; Reasonable Adjustments; Equality; Diversity.

Storage

This is Version 3 and is stored and available through the organisations Intranet/Internet.
This version supersedes the previous Version 31st July 2020.
Any copies of the previous policy held separately will be destroyed and replaced with this version.

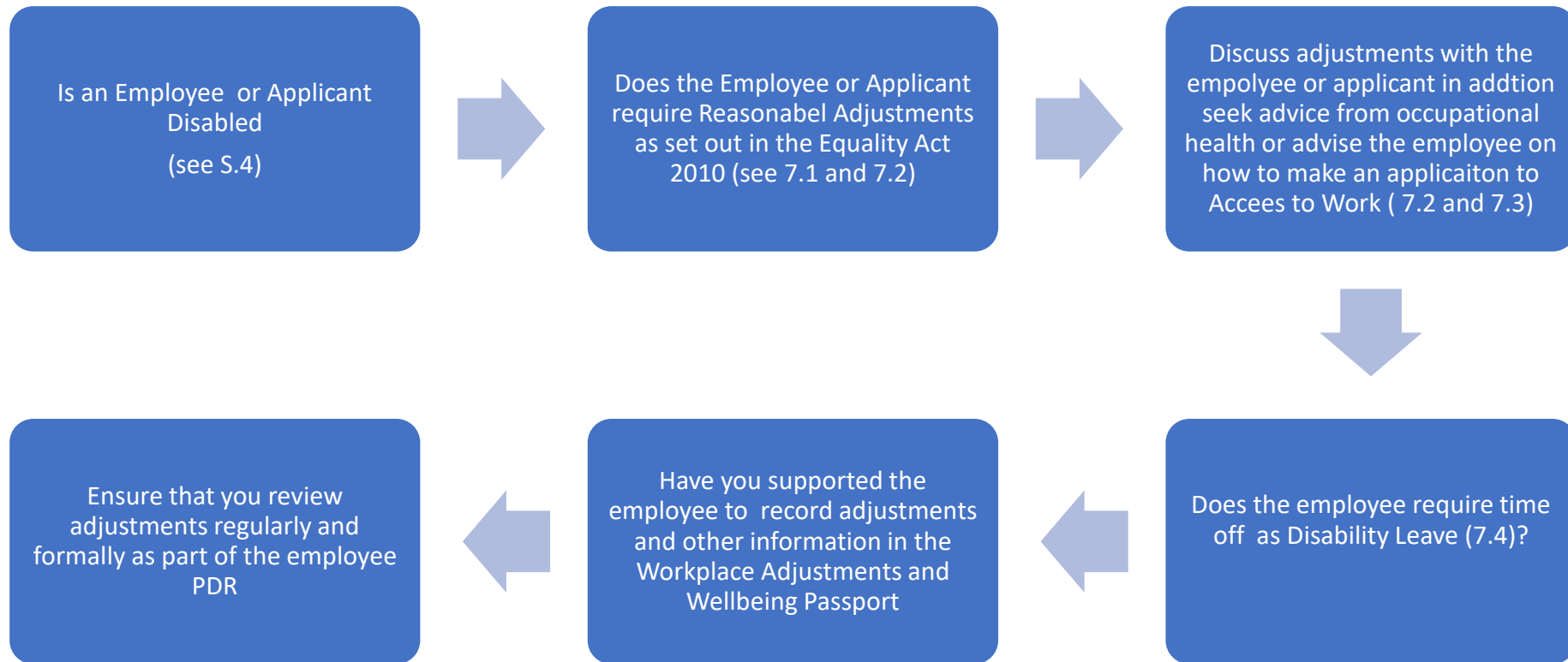**Version Control and Amendment Log**

Version No.	Type of Change	Date	Description of change(s)
1	New draft policy created	July 2017	Case of need agreed by EDG on the 20th of July 2017
	Ratification and issue	August 2017	Amendments made during consultation, prior to ratification • JPG – considered the draft policy– amendments were agreed and sent for confirmation to JPG to provide • verification. • The Trust Disability Confident Employer Task and Finish group members were consulted on the draft • Human Resources HRA and HRBP teams were consulted on the draft, amendments and comments were reviewed and the policy amended and updated. • Current legislation and associated guidance and NHS staff council guidance were considered.
2	Review / ratification / issue	July 2020	Scheduled review and update: Amendments made during consultation, prior to ratification: **Disability Confident Group** – reviewed the policy – updated to include reference to: • The new trust 'disability passport • Take account of NHs Employers guidance and terminology change from *Disability Related Absence* to *Disability Leave* to bring in line with how this type of absence is described in national documents. • Included reference to the Workforce Race Equality Standard (WDES) which has been implemented since the original version. • Latest guidance and good practice reviewed, and references updated **Joint Policy Group** • Requested clarity regarding inclusion of mental health section 7 amended. • Discussed if there was a need for a flow chart agreed a flow chart was not needed/appropriate. • 7.2.7 agreed to add 'additional support' and that list the 7.3.2 is not exhaustive. Confirmed the principles and values underpinning this policy are based on the Social Model of Disability.

V3		August – October 2023	Scheduled review and update: Amendments made during consultation, prior to ratification:
			• Amendments made to take account of changes in the way that staff access practical adjustments such as equipment and software, s.7.2.3
			• New separate guidance to be produced – Supporting Disabled Staff in the Workplace
			• Links to the new Reasonable Adjustments Providing Aids and Services Guidance inserted
			• Removed 2020 version appendix A and B and placed in the Supporting Disabled Staff in the Workplace
			• Extended the Access to Work section (7.3)
			• Discussed policy with the Disabled staff Network Group, additions to the guidance document referenced above agreed. Agreed to retain the name of the policy and the principle of the Social Model of Disability noted importance of training around these – included in implementation plan and training section.
			• Section 7.2.1 added this notes that Chairs of the Disabled Staff Network have 3 hours per week protected time allocated.
			• General amendment to reflect more contemporaneous language (i.e., removed Trust)
			• Added a flow chart
			• Removed reference to Mindful Employer
			• Updated reference list in other policy and Guidance section.
			• Equality Impact Assessment Reviewed no additional areas identified.
			• Policy reviewed by the Joint Policy Group no comments or changes requested.

Contents

Flowchart

Is an Employee or Applicant Disabled

(see S.4)

→

Does the Employee or Applicant require Reasonabel Adjustments as set out in the Equality Act 2010 (see 7.1 and 7.2)

→

Discuss adjustments with the empolyee or applicant in addtion seek advice from occupational health or advise the employee on how to make an applicaiton to Accees to Work (7.2 and 7.3)

↓

Ensure that you review adjustments regularly and formally as part of the employee PDR

←

Have you supported the employee to record adjustments and other information in the Workplace Adjustments and Wellbeing Passport

←

Does the employee require time off as Disability Leave (7.4)?

1. Introduction

Disabled people can face discrimination and disadvantage in the workplace, including physical, social, and attitudinal barriers. Our organisation is committed to supporting disabled employees by removing barriers, tackling discrimination, and implementing good employment practice.

Our organisation is committed to making adjustments for a range of impairments and to work to understand how these impact on people and create barriers. This includes physical and mental health, people with a Learning Disability and conditions associated with neurodiversity.

Our organisation aims to embrace a 'social model of disability' , the 'Social Model' of disability focuses on the principle that disability is caused by the way society is organised, rather than by a person's impairment or difference. Its focus is on looking at ways of removing barriers that restrict life choices for disabled people. Considering disabled staff within the context of this social model is empowering and positive and allows our organisation to demonstrate a clear commitment, it also aligns with our values.

The NHS Workforce Disability Equality Standard (WDES) underpins the principles of this policy. It supports our organisation to focus on year-on-year improvements in reducing barriers that impact most on career and workplace experiences of disabled staff, driving changes in attitudes, increasing employment and career opportunities, and implementing long-lasting change for Disabled people.

2. Scope

This policy applies to staff employed by our organisation. It is also relevant to people who are potential employees and those who undertake roles in our organisation but are not employed by SHSC such as volunteer's, contractors, trainees, and agency workers.

3. Purpose

3.1 The purpose of this policy is to set out the approach of our organisation in its aim to embrace a 'social model of disability'.

3.2 To set out what we will do to ensure that disabled staff, volunteers, and job applicants do not experience barriers to employment and

3.3 To set out key areas of policy relevant to disabled staff and potential employees.

4. Definitions

4.1 Disability

The Equality Act 2010 provides a legal definition of Disability; this policy applies to persons that fall within this definition. Guidance has also been published under the provisions of the Equality Act 2010 on *Matters to be Taken into Account in Determining Questions Relating to the Definition of Disability.* Relevant areas of

this guidance are referred to in this policy however the guidance should be considered when considering if this policy applies.[1]

The Equality Act 2010 definition:

*A person has a disability if they have a physical or mental impairment, and the impairment has a **substantial** and **long-term adverse** effect on Person's ability to carry out **normal day-to-day activities.***

4.2   **Substantial**
The Equality Act 2010 says that a substantial effect 'means one that is more than a minor or trivial effect'[2]. Statutory guidance provides more details of what this means [3] however it is noted in this guidance that whether a person satisfies the definition of a disabled person for the purposes of the Act will depend upon the full circumstances of the case.

4.3   **Long- term means**
The impairment has lasted or be likely to last 12 months or more. However certain conditions are deemed to be disabilities from day one, these are: Cancer, HIV infection and multiple sclerosis[4]

4.4   **Normal day-to-day activities**
The Equality Act 2010 Guidance and case law developments should be considered in relation to defining normal day to day activities.

4.5   **Conditions legally not deemed to be disabilities**
Equality Act 2010 (Disability) Regulations 2010 set out what is expressly not a Disability.[5]

4.6   **Disability Leave**
Disability leave is paid time off work for a reason related to someone's disability, for example time off to help them manage their disability, examples include time off to attend appointments or consultations or have treatment related to the on-going management of their disability. Disability Leave is not the same as Disability Related Sickness Absence.

4.7   **Disability Related Sickness Absence**
Disability-related sickness is a form of sickness absence that is directly or indirectly attributed to a person's disability or long-term condition.

5.   Detail of the Policy

The purpose of this policy is to set out how we approach our aim of embracing a 'social model of disability', what we will do ensure that disabled staff, volunteers and job applicants do not experience barriers to employment in our organisation and set out our policy on key areas relevant to disabled staff and potential employees.

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[1] https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/570382/Equality_Act_2010-disability_definition.pdf
[2] S.212 (1)
[3] https://www.gov.uk/government/publications/equality-act-guidance/disability-equality-act-2010-guidance-on-matters-to-be-taken-into-account-in-determining-questions-relating-to-the-definition-of-disability-html
[4] Equality Act 2010 Sch1, Para 6
[5] For more details see http://www.legislation.gov.uk/uksi/2010/2128/memorandum/contents

6. Duties

6.1 Line managers should be aware of this policy and bring it to the attention of disabled staff in their services and in particular adopt practice that supports the principles of the social model of disability.

6.2 Staff who are not disabled should be aware of the policy and in particular the principles of the social model of disability when working alongside colleagues who are disabled.

6.3 Disabled employees are encouraged to inform their line manager that they are disabled. While this is not obligatory, it is recommended that they do so to facilitate making reasonable adjustments. Disabled staff are also encouraged to complete the Electronic Staff Record (ESR) so that we can monitor the numbers of staff in SHSC who are Disabled.

7. Procedure

7.1 Employing Disabled People

7.1.1 We will aim to be an employer of choice for disabled people and work towards this by:
- Meeting level two of the Disability Confident Employer standard as a minimum and take action to meet Level Three – 'Disability Confident Leader'.
- Respond positively to national initiatives and work with local partners and stakeholders to maximise opportunities to employ disabled people.

7.1.2 We will maintain and publish information about the number of employees who are disabled and use national and local information such as the NHS staff survey and the Workforce Disability Equality Standard (WDES) metrics to identify areas for improvement where these appear to be required.

7.1.3 We will ensure that staff with responsibility for recruitment and line management receive appropriate training about disability and employment.

7.2 Reasonable Adjustments

7.2.1 It is important to note that the definition of disability in the Equality Act 2010 includes mental health.

7.2.2 The Equality Act 2010[6] requires that adjustments are considered in three areas, and if these are assessed as reasonable adjustments then they must be made. In the case of disability this means that a disabled employee or applicant may be treated more favourably than an employee or applicant who is not disabled.

The three areas that must be considered are:

- Where a 'provision, criterion or practice' puts a disabled person at a substantial disadvantage in relation to a relevant matter in comparison with

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[6] S.20 Equality Act 2010

persons who are not disabled, to take reasonable steps to avoid the disadvantage.

- Where a physical feature puts a disabled person at a substantial disadvantage in relation to a relevant matter in comparison with persons who are not disabled, to take reasonable steps to avoid the disadvantage.

- Where a disabled person would, but for the provision of an auxiliary aid, be put at a substantial disadvantage in relation to a relevant matter in comparison with persons who are not disabled, to take reasonable steps to provide the auxiliary aid.

7.2.3 How a provision, criteria or practice impacts on a disabled person needs to be considered on an individual basis and in line with current case law, this could include making changes to how a policy or practice is applied to a disabled person. Persons dealing with individual cases should seek advice from the People Directorate .

7.2.4 It is the responsibility of the line manager or person tasked with the equivalent role to facilitate consideration of reasonable adjustments and ensure that where these have been agreed access to them is facilitated in a timely manner. In addition to adjustments agreed directly with the line manager Occupational Health may advise on adjustments or the employee can apply to access to work (see 7.3)

7.2.5 Delays in providing adjustments may impact negatively in disabled staff therefore arranging adjustments must be prioritised. The timescale for meeting adjustments must be agreed with the disabled member of staff, and if there is a delay agree how the identified barriers are going to be addressed in the short term.

7.2.6 A process has been established to support disabled staff to receive equipment and items such as software without unreasonable delays. The details of this process are set out in [Reasonable Adjustments Providing Aids and Services Guidance](#)

7.2.7 Where changes to physical features are required the Facilities Directorate (Estates Department) should be contacted to discuss the requirements.

7.2.8 The legal duty to make reasonable adjustments lies with the organisation not individual services so if a cost or requirement is reasonable this must be met.

7.2.9 The Equality Act 2010 (Disability) Regulations 2010, include some provisions regarding reasonable adjustments which may be considered in particular when looking at providing ancillary aids and additional support or proposed changes to buildings.

7.2.10 A decision not to make an adjustment must be objectively justified.

7.2.11 As soon as a line manager is made aware that a member of staff may be disabled and may require adjustments, they must prioritise a meeting with the member of staff to discuss this.

7.2.12 The Workplace Adjustment and Wellbeing Passport is a collaborative, voluntary, live record of adjustments agreed between the employee and their manager to support them at work because of their health condition or disability. Adjustments agreed should be recorded in the passport.

7.3 Access to Work

7.3.1 Access to Work grants can pay for practical support for a disabled employee or applicant to start working or stay in work. Grants are available for people over 16 who have a disability, health condition or mental health condition that affects the person's ability to work.

7.3.2 Grants can pay for things like:
- Adaptations to equipment
- Special equipment
- Fares to work if you can't use public transport
- A support worker or job coach to help in the workplace
- A support service if someone has a mental health condition and are absent from work or finding it difficult to work
- Disability awareness training for colleagues
- A communicator at a job interview
- The cost of moving equipment if someone changes location or job

This list is not exhaustive

7.3.3 Disabled staff or applicants must apply for the grant themselves, however it is important that line managers are aware of this option and provide advice and information to staff who may be disabled or become disabled while they are in employment.

7.3.4 Applications must be made within six weeks of starting a new position for a maximum contribution to be paid by access to work.

7.3.5 Information about how to make an application and support staff to receive equipment and other items recommended can be found in the [Reasonable Adjustments Providing Aids and Services Guidance](#)

7.4 Disability Leave and Disability Related Sickness Absence

7.4.1 Disability Leave is a period of time off work which has been approved by the employer for a reason related to an employee's disability. For example, to attend a hospital appointment or to receive treatment and may be a reasonable adjustment under the Equality Act 2010.

7.4.2 Disability and ill health are not the same thing, this type of absence may be required to help someone manage their disability. Disability Leave must not be recorded as sickness absence.

7.4.3 Disability Leave is not intended to apply to extended periods of absence. Long periods of absence will be considered under the Supporting Attendance and

Managing Sickness Absence Policy or flexible working policy dependant on circumstances.

7.4.4 Disability related sickness absence is a form of sickness absence that is directly or indirectly attributed to a person's disability or long-term condition. Such absences should be flagged by the employee as relating to their disability when notifying their manager and the Supporting Attendance and Managing Sickness Absence Policy will apply.

7.4.5 On occasion absence related to Disability Leave and Sickness Absence associated with a disability may overlap, where this is the case a line manager will have discretion to exclude some of the period of absence as Disability Leave as long as they can objectively justify this decision.

7.5 Personal Assistant Support

Disabled staff or applicants may have a personal assistant who they employ to support them. In such cases, the personal assistant's expenses would normally be covered by the disabled person or for example by an access to work grant however if this is not the case then reimbursement of travel and subsistence allowances to allow the personal assistant to accompany the disabled person should be considered as a reasonable adjustment.

7.6 Improving the Workplace for Disabled staff

7.6.1 We are committed to improving facilities for disabled employees and service users. When undertaking new building, alterations, or site moves, consideration will be given to the need for and improvements to physical access to buildings and worksites.

7.6.2 Employees who have a disability or long-term health issue will be entitled to reasonable time off to attend Staff Network meetings and relevant work groups.

7.6.3 Chairs of the Disabled Staff Network have 3 hours per week protected time allocated, this will be facilitated through their line manager.

7.7 Preventing Unlawful Discrimination

7.7.1 Failure to make a reasonable adjustment for a disabled member of staff is unlawful discrimination. We will consider requests for adjustments carefully and will objectively justify any requests for adjustments that cannot meet, to the person making the request.

7.7.2 We will encourage line managers (through guidance and use of the Workplace Adjustments and Wellbeing Passport) to liaise with colleagues when disabled members of staff move posts or premises to ensure continuation of agreed adjustments.

7.7.3 Making reasonable adjustments is an on-going requirement which should be reviewed at regular intervals.

7.7.4 All staff volunteers' contractors and agency workers are expected to meet the requirements of the Equal Opportunities and Dignity at Work Policy. Negative attitudes and banter associated with disabled people will not be tolerated and it is the responsibility of all staff to challenge this in all areas of the workplace.

8. Development, Consultation and Approval

Consultation and Development of the policy (V1) was led by the Head of Equality and Inclusion. The Disability Confident Employer Task and Finish group, Human Resources HRA and HRBP and JCF were consulted and involved in developing the Policy. Legislation and associated guidance and NHS staff council guidance were considered.

Version 2 - Review of the policy took place with members of the 'Disability Confident' group and the JCF was consulted
Changes made in response:

- Inclusion of reference to the Workplace Adjustment and Wellbeing Passport
- Terminology change from Disability Related Absence to Disability Leave to bring in line with nationally recognised definitions.
- Included reference to the Workforce Race Equality Standard (WDES) which has been implemented since the original version.
- Requested clarity regarding inclusion of mental health section 7 amended.
- Discussed if there was a need for a flow chart agreed a flow chart was not needed/appropriate.
- 7.2.7 agreed to add 'additional support' and that list the 7.3.2 is not exhaustive.
- Confirmed the principles and values underpinning this policy are based on the Social Model of Disability

Version 3 of this policy has been informed by feedback from the Disabled Staff Network.
New procedures introduced that are referenced in this policy were informed by specific feedback from Disabled staff as part of a project to improve access to reasonable adjustments that took place in October 2022 – March 2023.

Changes were made in response were:
- Agreement to introduce a new central costs centre for purchase of equipment and software
- A new central process for accessing adjustments recommended by Access to Work, Occupational health or agreed with the line manager – these are set out in new guidance
- New guidance has been produced and the appendices of this policy have been moved to the new guidance
Version 3 has been considered by the JCF Policy Group October 2023
Version 3 has been considered by the People Directorate Quality and Governance Group September 2023.

9. Audit, Monitoring and Review

Monitoring Compliance Template						
Minimum Requirement	Process for Monitoring	Responsible Individual/ group/committee	Frequency of Monitoring	Review of Results process (e.g., who does this?)	Responsible Individual/group/ committee for action plan development	Responsible Individual/group/ committee for action plan monitoring and implementation
Meeting statutory requirements associated with the policy	Regular reports to the People Committee and specifically via the Workforce Disability Equality Standard (WDES) Reports	Head of Equality and Inclusion reporting to the People Committee	Tri Annual	Head of Equality and Inclusion and HR Senior Managers Team	Head of Equality and Inclusion	Head of Equality and Inclusion – assurance through the Inclusion and Equality Group

The policy review date is 31 October 2026.

10. Implementation Plan

Action / Task	Responsible Person	Deadline	Progress update
Upload new policy onto intranet and remove old version	Corporate Governance	December 2023	
Communicate the updated policy through a Learning and Sharing Forum	Head of Equality and Inclusion	December 2023	Session Planned in schedule
Update Jarvis Reasonable Adjustments Page	Head of Equality and Inclusion	December 2023	
Develop a short training session and post on Jarvis page	Head of Equality and Inclusion	February 2024	
Guidance in development Supporting Disabled Staff in the Workplace	Head of Equality and Inclusion	December 2023	In development

11. Dissemination, Storage And Archiving (Version Control)

The policy is available on the Trust's intranet and available to all staff.

It will be disseminated as a new HR policy

Links to the policy will be placed on relevant intranet pages for example the Staff Wellbeing Intranet widget

Version	Date on website (intranet and internet)	Date of entry in Connect (all staff communication)	Any other promotion/ dissemination (include dates)
1	August 2017	August 2017	N/A
2	July 2020	August 2020	Manager Briefing and via relaunch of the Disabled staff network
3.	TBC	TBC	Manager Briefing and via the Disabled staff network

This is Version 3 and is stored and available through the SHSC Intranet/Internet.
This version supersedes the previous Version 2 [July 2020].
Any copies of the previous policy held separately should be destroyed and replaced with this version.

All versions of HR policies are stored on the HR Shared Drive by the policy author and the PA to the Director of People

12. Training and Other Resource Implications

12.1 Training will be facilitated through integration into other existing training and in line with the developments in the implementation plan this will include a focus on the principle of the Social Model of Disability that underpins this policy.

12.2 Other methods of communicating this policy will be through the Disabled Staff Network Group

12.3 There are no new cost implications associated with this policy

13. Links To Other Policies, Standards, References, Legislation (Associated Documents) And National Guidance

- Recruitment and Selection Policy
- Equal Opportunities and Dignity at Work Policy
- Supporting Attendance Policy
- Equality Act 2010
- Workforce Disability Equality Standards (WDES)
- The NHS People Plan - commits the NHS to a range of programmes that directly relates to the WDES such as improving access to flexible working, retaining staff, reducing bullying and harassment and supporting more diverse leadership teams.
- NHS Employers – An Inclusive Approach to Disability Leave
- NHS People Promise –
- The Social Model of Disability | NDACA - YouTube
- Reasonable Adjustments Providing Aids and Services Guidance
- Jarvis Reasonable Adjustments Page - https://jarvis.shsc.nhs.uk/things-support-me-do-my-job/everyone/reasonable-adjustments

14. Contact Details

Job Title	Name	Phone	Email
Head of Equality and Inclusion	Liz Johnson		Liz.johnson@shsc.nhs.uk

Appendix A

Equality Impact Assessment Process and Record for Written Policies

Stage 1 – **Relevance** - Is the policy potentially relevant to equality i.e. will this policy potentially impact on staff, patients or the public? This should be considered as part of the Case of Need for new policies.

NO – No further action is required – please sign and date the following statement. **I confirm that this policy does not impact on staff, patients or the public.**	*I confirm that this policy does not impact on staff, patients or the public.* Name/Date:	**YES,** Go to **Stage 2**

Stage 2 Policy Screening and Drafting Policy - Public authorities are legally required to have 'due regard' to eliminating discrimination, advancing equal opportunity and fostering good relations in relation to people who share certain 'protected characteristics' and those that do not. The following table should be used to consider this and inform changes to the policy (indicate yes/no/ don't know and note reasons). Please see the SHSC Guidance and Flow Chart.

Stage 3 – **Policy Revision** - Make amendments to the policy or identify any remedial action required and record any action planned in the policy implementation plan section

SCREENING RECORD	Does any aspect of this policy or potentially discriminate against this group?	Can equality of opportunity for this group be improved through this policy or changes to this policy?	Can this policy be amended so that it works to enhance relations between people in this group and people not in this group?
Age	**No**	No	**No**
Disability	**No**	Yes – the policy is specifically aimed at promoting equality of opportunity for Disabled staff, job applicants and volunteers.	The policy aims to promote the concept of a social model of disability.
Gender Reassignment	**No**	No- there is a separate policy on Gender Reassignment Support in the Workplace Policy An employee who identifies that they have 'gender dysphoria', and the condition has a substantial and long-term adverse impact on their ability to carry out normal day-to-day activities may be protected under the provisions in the Equality Act 2010, relating to the protected characteristic of disability. All aspects of this policy would apply as they would to any other disabled member of staff however.	**No**

Pregnancy and Maternity	No	No – the parental leave policy and risk assessment should be referred to	No
Race	No	No specific issue have been identified relevant to race	No
Religion or Belief	No	No specific issue have been identified relevant to Religion or Belief	No
Sex	No	No specific issue have been identified relevant to sex	No
Sexual Orientation	No	No specific issue have been identified relevant to sexual orientation	No
Marriage or Civil Partnership	No	**Not Applicable**	

Policy Amended and no changes made. Impact Assessment Completed by: Liz Johnson Head of Equality and Inclusion October 2023

Appendix B

Review/New Policy Checklist

This checklist to be used as part of the development or review of a policy and presented to the Policy Governance Group (PGG) with the revised policy.

			Tick to confirm
	Engagement		
1.	Is the Executive Lead sighted on the development/review of the policy?		Yes
2.	Is the local Policy Champion member sighted on the development/review of the policy?		Yes
	Development and Consultation		
3.	If the policy is a new policy, has the development of the policy been approved through the Case for Need approval process?		N/A
4.	Is there evidence of consultation with all relevant services, partners and other relevant bodies?		Yes
5.	Has the policy been discussed and agreed by the local governance groups?		Yes
6.	Have any relevant recommendations from Internal Audit or other relevant bodies been taken into account in preparing the policy?		N/A
	Template Compliance		
7.	Has the version control/storage section been updated?		Yes
8.	Is the policy title clear and unambiguous?		Yes
9.	Is the policy in Arial font 12?		Yes
10.	Have page numbers been inserted?		Yes
11.	Has the policy been quality checked for spelling errors, links, accuracy?		Yes
	Policy Content		
12.	Is the purpose of the policy clear?		Yes
13.	Does the policy comply with requirements of the CQC or other relevant bodies? (where appropriate)		N/A
14.	Does the policy reflect changes as a result of lessons identified from incidents, complaints, near misses, etc.?		Yes
15.	Where appropriate, does the policy contain a list of definitions of terms used?		Yes
16.	Does the policy include any references to other associated policies and key documents?		Yes
17.	Has the EIA Form been completed (Appendix 1)?		Yes
	Dissemination, Implementation, Review and Audit Compliance		
18.	Does the dissemination plan identify how the policy will be implemented?		Yes
19.	Does the dissemination plan include the necessary training/support to ensure compliance?		Yes
20.	Is there a plan to i. review ii. audit compliance with the document?		Yes
21.	Is the review date identified, and is it appropriate and justifiable?		Yes