

Policy:

Managing and Supporting Employees Experiencing Domestic Abuse

Executive Director lead	Executive Director
Policy Owner	Head of Equality and Inclusion
Policy Author	Head of Equality and Inclusion

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Summary of policy – This policy sets out how the Trust will respond to issues related to domestic abuse involving employees.

The changes made to this version of the policy are summarised on page 2-3 (amendment log).

Target audience	All Sheffield Health and Social Care NHS Foundation Trust (SHSC) staff (including staff seconded into or working into SHSC services) volunteers, governors and the Board of Directors
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Keywords	Domestic Abuse; Staff; Employees; Workplace
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Storage & Version Control

This is Version 5 and is stored and available through the SHSC Intranet/Internet. This version supersedes the previous Version 4 July 2019.

Any copies of the previous policy held separately should be destroyed and replaced with this version.

Version Control and Amendment Log

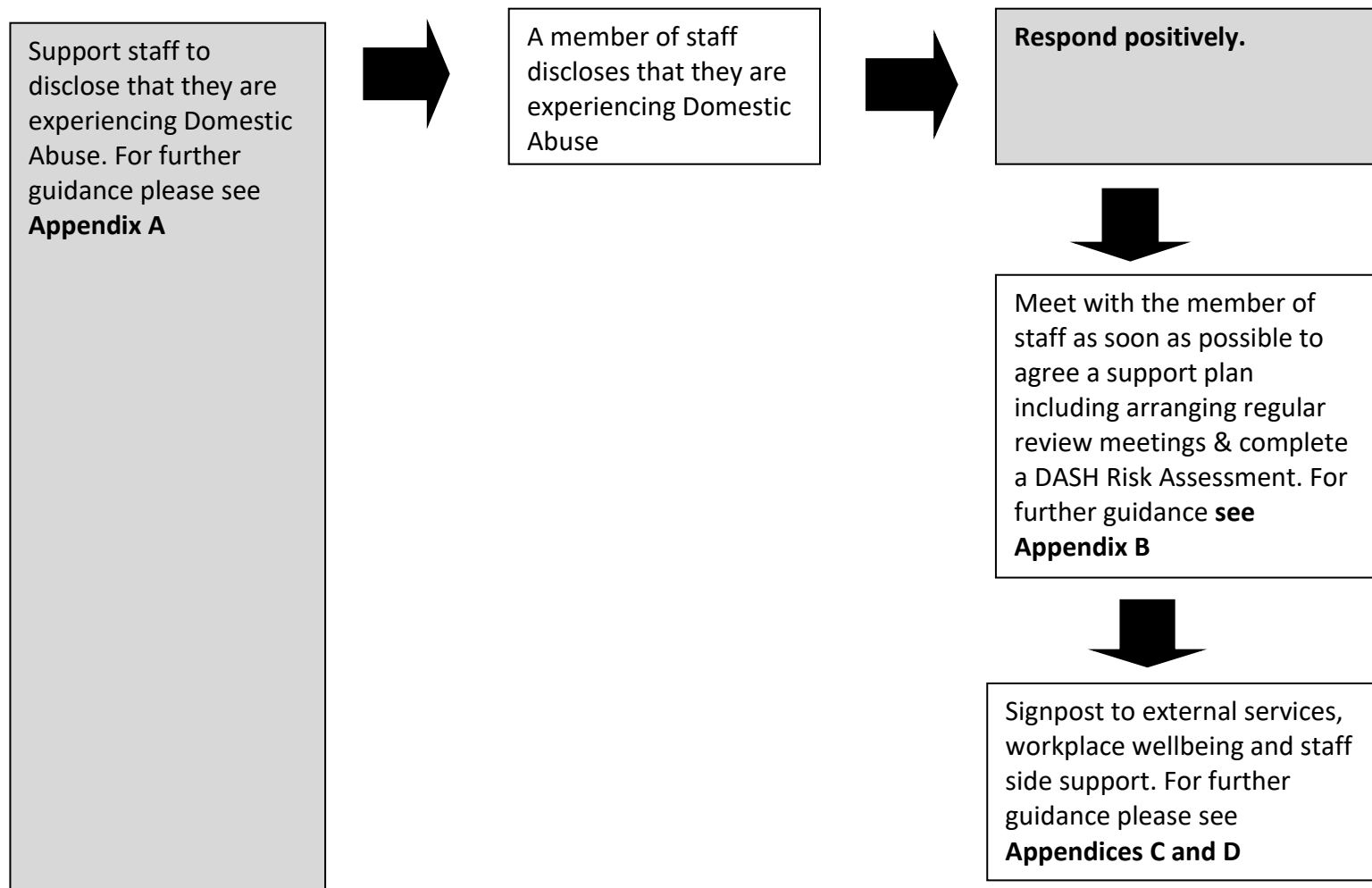
Version No.	Type of Change	Date	Description of change(s)
1	New policy	Jan 2014	<p>The policy was developed using existing policies in other Trusts as a starting point. The policy also took account of guidance published by the Equality and Human Rights Commission. Original Consultation took place between June 2013 and September 2013.</p> <p>The process included:</p> <ul style="list-style-type: none"> • Consideration of the draft policy through the Trust Joint Consultative Forum • Discussion with the Trust Safeguarding service who were updating the Trust Safeguarding Policy • The Trust Operational Directors to cascade <p>Outcome of original consultation:</p> <ul style="list-style-type: none"> • It was agreed to ensure an interface between information in the Trust's Safeguarding Policy which covers domestic abuse involving Trust Service Users. • JCF suggested that all staff should receive some sort of training on the policy. It was agreed that a leaflet would be produced. • The policy was amended to reflect links and support available from Staff Side, support available from Workplace Wellbeing and the Trust position with regard to staff who are perpetrators.
2	Updated	June and Dec 2015	Updated
2.1	Corrected		Section 1.3 amended to correct an inaccuracy
3	Updated	July 2016	<p>Changes suggested agreed and reviewed through Multi-agency Domestic Abuse Group</p> <ul style="list-style-type: none"> • Update to take account of changes in national policy and local multiagency services. • Updated contact details for services • Added Reference to: Honour Based Violence (HBV) & Female Genital Mutilation (FGM)
4	Review / Consultation / Approval / Ratification /	April to July 2019	<p>Full review completed as per the HR Policy Governance schedule.</p> <ul style="list-style-type: none"> • updated the definition at section 4.6. • Checked all references are correct.

	Issue	<ul style="list-style-type: none"> Updated and checked all of the information in Appendices C and D some services websites no longer exist. The main websites remain which contain relevant information and are up-to-date. <p>The Trust's Safeguarding Lead requested the following update:</p> <ul style="list-style-type: none"> At section 4.3 added a statement re Coercive Control (recognised as a crime since 2015). At section 7.1.9 policy amended - risk to children in a household must be reported directly to Children's Safeguarding Hub to avoid delay in action and a hyperlink included to the Sheffield Children's Safeguarding Hub. <p>Updated policy reviewed by the Joint Policy Group (Staff Side) on 4th July 2019 – no changes or updates requested.</p>
5	Review / Consultation / Approval / Ratification / Issue	<p>Full review completed as per the HR Policy Governance schedule.</p> <ul style="list-style-type: none"> Reformatted to match current trust policy template Revised Implementation Plan & Dissemination, storage and archiving (control) Revised Version Control and Amendment Log & Audit, Monitoring and Review section. Updated monitoring compliance template to reflect current arrangements. Inclusion of Equality Impact Assessment Process and Record for Written Policies Checked all information referenced still accurate and hyperlinks still active Reviewed Appendices to ensure all resources accurate and up to date. Appendices separated out onto individual pages. 7.21 - potential action under the disciplinary policy 'determined on a case by case basis Amendments to include reference to DASH risk assessment 7.1 & flowchart. All acronyms explained Included reference to 'all staff'

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Flowchart – Managing and Supporting Employees Experiencing Domestic Abuse



1. Introduction

This policy provides a framework for the management and support of employees experiencing Domestic Abuse.

Domestic violence and abuse is an issue which affects members of the workforce as well as people who use Trust services. The trust recognises that all staff may experience domestic violence and that the impact on a member of staff experiencing domestic violence and abuse is significant. However, this may be an area that line managers are unclear about in terms of how to support the member of staff and the extent to which this is a personal or work-related area.

The Equality and Human Rights Commission note that staff experiencing domestic violence or abuse may end up being the subject to disciplinary action and even lose their jobs because of their behaviour associated with the fact they are experiencing domestic violence, for example, being late or absent from work, or concerns regarding performance. They note that:

- 75% of women that experience domestic abuse are targeted at work – from harassing phone calls and abusive partners arriving at the office unannounced, to physical assaults.¹
- Work may also be a ‘safe haven’

Walby and Allan (2004)² found that ‘among employed women who suffered domestic violence in the last year, 21 per cent took time off work and two per cent lost their jobs. Among men in this situation, six per cent took time off work and two per cent lost their jobs.’

When a member of staff is experiencing domestic violence or abuse this may impact on other members of the workforce.

Employers have a duty of care to employees under health and safety legislation to consider risks to health and well-being and deal with these appropriately.

The Trust is committed to heightening awareness of domestic violence and its impact in the workplace and to providing guidance for both managers and employees. The Trust is committed to assisting staff experiencing domestic violence or abuse in a confidential and sympathetic manner.

2. Scope of this policy

The policy is Trust-wide and is relevant to all people employed by or working in the Trust including those working in the Trust under honorary contracts and as contractors or volunteers.

This policy does not cover domestic abuse experienced by service users. This area is covered under the Trust Domestic Abuse policy for service users, available on the Trust internet and intranet site.

¹ EHRC <https://www.equalityhumanrights.com/en/advice-and-guidance/domestic-abuse-workplace-policies-and-managing-and-supporting-employees>

² Walby and Allen (2004)- Domestic violence, sexual assault and stalking: Findings from the British Crime Survey – Home Office Research Study 276

This policy covers domestic abuse experienced by staff irrespective of gender or sexual orientation and includes forced marriage as a form of domestic abuse.

Where appropriate, this policy should be used in conjunction with other Trust policies such as Flexible Working and Leave policies and taken account of when considering action under undertaking disciplinary or capability policies. The Trusts responsibility for child protection and adult protection set out in relevant Trust policies should also be considered.

3. Purpose

The Trust is committed to recognising when a member of staff is experiencing domestic violence, supporting the member of staff in the workplace, maintaining information about local services and signposting the member of staff to this information.

The policy is supported by specific Guidance and Information (see Appendices A-D).

4. Definitions

4.1 Domestic Abuse

The Department of Health definition of domestic violence and abuse is:

'Any incident or pattern of incidents of controlling, coercive or threatening behaviour, violence or abuse between those aged 16 or over who are or have been intimate partners or family members regardless of gender or sexuality This can encompass, but is not limited to:

- psychological
- physical
- sexual
- financial
- emotional

The definition includes so called 'honour' based violence, female genital mutilation (FGM) and forced marriage, and is clear that victims are not confined to one gender or ethnic group.³

4.2 Controlling Behaviour

A range of acts designed to make a person subordinate and/or dependent by isolating them from sources of support, exploiting their resources and capacities for personal gain, depriving them of the means needed for independence, resistance and escape and regulating their everyday behaviour.⁴

4.3 Coercive behaviour

An act or a pattern of acts of assault, threats, humiliation and intimidation or other abuse that is used to harm, punish, or frighten the victim.⁵

³ See Crown Prosecution Service website <https://www.cps.gov.uk/domestic-abuse>

⁴ See Crown Prosecution Service website <https://www.cps.gov.uk/domestic-abuse>

⁵ See Crown Prosecution Service website <https://www.cps.gov.uk/domestic-abuse>

Coercive Control which has a serious effect on a partner has been recognised as a crime since 2015.

4.4 Forced Marriage

The Foreign and Commonwealth Office and Home Office definition from the Forced Marriage and Law and the Justice System March 2013

'A forced marriage is where one or both people do not (or in cases of people with learning disabilities, cannot) consent to the marriage and pressure or abuse is used. It is an appalling and indefensible practice and is recognised in the UK as a form of violence against women and men, domestic/child abuse and a serious abuse of human rights'.

[The Anti-social Behaviour, Crime and Policing Act 2014](#) makes it a criminal offence to force someone to marry, this includes:

- Taking someone overseas to force them to marry (whether the forced marriage takes place or not).
- Marrying someone who lacks the mental capacity to consent to the marriage (whether they are pressured to or not).

Failing to adhere to a Forced Marriage Protection Order is a criminal offence.

The civil remedy of obtaining a Forced Marriage Protection Order through the family courts will continue to exist alongside the new criminal offence, so victims can choose how they wish to be assisted.

Details of the new law can be found on the [Legislation website](#).

4.5 Honour Based Violence (HBV)

Honour Based Abuse - An incident or crime which has or may have been committed to protect or defend the 'honour' of the family and/or community.

Honour Killing - An 'honour' killing is sometimes carried out when victims are perceived to have caused irreversible dishonour to the family name by engaging in Western behaviours. It could be that the victim has a boyfriend or has refused an arranged marriage.⁶

4.6 Female Genital Mutilation (FGM)

Female Genital Mutilation (FGM) is a collective term for a range of procedures which involve partial or total removal of the external female genitalia for non-medical reasons. It is sometimes referred to as female circumcision, or female genital cutting.⁷

Please see SHSC Safeguarding Children Policy for guidance where a child is at risk.

⁶ See Crown Prosecution Service website <https://www.cps.gov.uk/domestic-abuse>

⁷ See Crown Prosecution Service website <https://www.cps.gov.uk/domestic-abuse>

5. Detail of the policy

The broad overview of this policy is as described in the introduction.

6. Duties

All staff should be aware of the policy as it applies to them as individual members of staff or volunteers.

All staff with leadership / managerial responsibilities must be aware of this policy and its related procedures and guidance and ensure that it is applied in their area of responsibility.

Specialist staff for example in areas such as HR, workplace wellbeing etc. should have a good working knowledge of the policy and related procedures and guidance.

The Equality and Inclusion Lead is responsible for ensuring the policy is up to date.

7. Process

7.1 Supporting Staff

Managers of staff should be aware of the impact of domestic abuse on members of staff and the definitions of domestic abuse set out in section 3.

Managers should be mindful of potential indicators of domestic abuse when dealing with HR issues – see **Appendix A**

Where an employee discloses that they are experiencing domestic abuse the employee should be believed.

Disclosures relating to domestic abuse should be treated confidentially unless:

- There are concerns about safeguarding children.
- There are concerns about safeguarding adults (at risk).
- The employee agrees to the information being shared as part of a plan of support.
- There is a direct threat to the health or safety of other employees.
- They are assessed as High Risk following completion of the Domestic Abuse, Stalking, Harassment and Honour Based Violence (DASH) Risk Assessment

Where a manager believes that information needs to be shared without the staff members consent, they should wherever possible explain their reasons to the member of staff.

When an employee discloses that they are experiencing domestic abuse the manager should complete a DASH Risk Assessment with the staff member and identify any adult or child safeguarding concerns. This discussion should include safety planning and how the manager will support the staff member keep safe at work, signposting or facilitating contact with domestic abuse services and offer relevant referrals for their emotional wellbeing.

If the DASH risk assessment indicates that the case is high risk, needs to be heard at Multi-Agency Risk Assessment Conference (MARAC), and a crime has been disclosed, the manager will need to formally report these to South Yorkshire Police (SYP) prior to the case being heard at MARAC. At the point of disclosure ascertain the victim/survivors' views as to

whether they wish the police to take action in relation to the crimes or not. Please report the crime/s to SYP via the weblink [Form \(reportingcrime.uk\)](http://Form(reportingcrime.uk)) or by calling 101. Be clear to SYP that the victim requires either:

- A trauma informed response – this means that action will not be taken other than the recording of the crime/s; or
- An investigation of the crime/s

Please request when reporting to SYP that an incident is not created, and the crime is tasked to the SYP Domestic Abuse Risk Assessment (DARA) team high risk in tray. Add/share your name and contact details and request an update so that you can continue to support the victim if appropriate (e.g., if a trauma informed response is requested but SYP think the issue needs to be investigated because of its seriousness). The key thing is to explain what the victim's wishes are and any safety concerns they have.

Ensure the DASH Risk Assessment you have obtained is attached/shared and include details of any safety planning you have put in place for the victim – evidence of safety planning means it is less likely that the police will need to take action. However, serious risk to the victim/ their children or dependents or the wider public, may mean that the Police will still take action regardless of the wishes of the victim.

See Appendix B

A copy of the DASH Risk Assessment and Referral Tool can be found in SHSC's [Domestic Abuse Policy](#) or by emailing SHSC's Safeguarding Team at SHSCsafeguarding@shsc.nhs.uk

As part of a support plan the manager may authorise reasonable emergency time off, on a similar basis to the carer leave provisions in the Leave Policy, for example for the member of staff to move to safe premises.

As part of a support plan the manager may agree flexible working.

If a manager becomes aware that there are children or vulnerable adults in the employee's family who may be at risk from the perpetrator the manager should report directly to the [Children's Safeguarding Hub](#) to avoid a delay in action.

<https://www.safeguardingsheffieldchildren.org/sscb/safeguarding-information-and-resources/referring-a-safeguarding-concern-to-childrens-social-care>

7.2 Perpetrators

Staff may also be perpetrators of domestic abuse. Domestic abuse is a serious issue and may lead to criminal proceedings. Adult and child protection policies should be considered if a manager becomes aware that a member of staff is potentially or actually perpetrating domestic abuse.

If the victim and the perpetrator are both members of staff then HR should be contacted so that appropriate action can be considered. Action will depend on individual circumstances but could include:

- temporary adjustments to duties/location of one or both members of staff
- potential action under the disciplinary policy determined on a case by case basis
- advice from and or involvement of the police

Domestic abuse is always the responsibility of the perpetrator however managers should aim to support staff undertaking action to address their behaviour associated with perpetrating domestic abuse, taking account always of the Trust responsibility to protect children and vulnerable adults.

The national organisation Respect (Phone Line) provides a helpline for perpetrators who want to stop abusive behaviour **(see Appendix D)**.

7.3 Maintaining a HR Contact and Providing Information and Training

The Trust Safeguarding Team will identify a contact to maintain up to date information about local services and advice.

The Trust Safeguarding Team will maintain information for managers and staff to access on the Trust intranet and in publicise local domestic abuse services.

Staff new to the organisation will be made aware of this policy at induction as part of the comprehensive safeguarding training.

Specific team training will be provided by the SHSC Safeguarding Team as requested.

7.4 Police Involvement

Where a perpetrator is threatening the victim or other staff the police should be involved in the same way as any other situation where staff are threatened

8. 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
Policy Review	Human Resources policies are subject to joint monitoring and review between Management Side and Staff Side	Any changes will be discussed and approved by HR Senior Management Team and the HR Policy Group.	At least every 3 years.	HR Business Partner/HR Advisor	Human Resources policies are subject to joint monitoring and review between Management Side and Staff Side in the Joint Policy Group and at the status minutes at the Joint Consultative Forum	HR Team

9. Implementation plan

Action / Task	Responsible Person	Deadline	Progress update
New policy to be replaced on the Intranet and SHSC website.	Director of Corporate Governance	Within 5 working days of ratification	TBC
A communication will be issued to all staff via Connect.	Director of Corporate Governance		TBC
The HR Advice Team will review training provision.	HR Adviser, as appropriate		TBC
Ensure Safeguarding Team are aware of new policy.	Head of Equality and Inclusion		TBC

10. Dissemination, storage and archiving (control)

Human Resources policies are referred to in employees' contracts of employment and statement of terms. Policies are available on the SHSC intranet and, if necessary, a paper copy can be provided by the People Directorate.

This is Version 5 and is stored and available on Jarvis.

This version supersedes the previous Version 4 July 2019.

Any copies of the previous policy held separately should be destroyed and replaced with this version.

11. Training and other resource implications

Employees will be made aware of this revised Policy by the usual SHSC communication systems.

A briefing will be given via email (in Connect) to all staff to ensure they are aware of the latest policy.

Reference will be made to the policy in relevant training such as recruitment.

12. Links to other policies, standards, references, legislation (associated documents) and national guidance

- Supporting Attendance Absence Policy
- Performance and Capability Policy
- Health and Safety Policy Statement
- Incident Reporting Policy
- Leave Policy
- Flexible Working Policy
- Equal opportunities and Dignity at Work Policy
- Safeguarding Children
- Safeguarding Adults

13. Contact details

<i>Title</i>	<i>Name</i>	<i>Phone</i>	<i>Email</i>
HR Advice Team		0114 2263301	HRAdvisors@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	N/A	N/A
Disability	No	N/A	N/A
Gender Reassignment	No	Yes – signposts to LGBTQI specific support.	N/A
Pregnancy and Maternity	No	N/A	N/A

Race	No	N/A	N/A
Religion or Belief	No	N/A	N/A
Sex	No	Yes – acknowledges that domestic abuse can affect both sexes and signposts to sex specific support.	N/A
Sexual Orientation	No	Yes – signposts to LGBTQI specific support.	N/A
Marriage or Civil Partnership	No		

Please delete as appropriate: - Policy Amended / Action Identified (see Implementation Plan) / no changes made.

Impact Assessment Completed by:
HRBP Team 18/09/2023

Appendix B – Ways you can Support Staff to discuss Domestic Violence or Abuse

1. Put up domestic abuse helpline posters on the back of toilet doors.
2. Look for sudden changes in behaviour and/or changes in the quality of work performance for unexplained reasons despite a previously strong record
3. Look for changes in the way an employee dresses i.e. excessive clothing on hot days, changes in the amount of make-up worn
4. Be aware of the information available on the intranet and this guidance
5. Your Trade Union may be able to offer support and assistance.
6. Contact SHSC Safeguarding office for advice.
7. Keep a record of any incidents of abuse on work premises, including persistent telephone calls, emails or visits to the workplace.
8. Arrange for and provide regular one to one meetings with the member or staff to review the situation.
9. Have a list of support services that is easily accessible and refer employees to appropriate organisations that deal with domestic abuse.
10. The Trust Head of Equality and Inclusion and the Trust Safeguarding Lead can provide specific additional advice. Please see the Trust intranet pages for contact details

Appendix C – Responding to and Supporting Staff Experiencing Domestic Violence

Responding and Supporting

1. When a member of staff discloses experiencing domestic abuse take it seriously and recognise your responsibilities to provide support.
2. Reassure the employee that the organisation has an understanding of how domestic abuse may affect their work performance and the support that can be offered.
3. Arrange to meet with the employee to develop a plan to support the employee. This could involve:
 - Agreeing flexible working – for example changing the time an employee starts and finishes work.
 - Agree time off at short notice to support an employee who may need to leave their home at short notice or plan to do so – for example to move to a refuge.
 - Make arrangements to divert phone calls and/or email messages and look to change a phone extension if an employee is receiving harassing calls. Women's Aid have produced a guidance on Digital Stalking found <https://www.womensaid.org.uk/information-support/what-is-domestic-abuse/online-safety>
 - Agreeing with the employee what to tell colleagues and how they should respond if their ex/partner telephones or visits the workplace.
 - Ensuring the employee does not work alone or in an isolated area and discuss with the member of staff arrangements for getting safely to and from home.
 - Discuss risk and complete a risk assessment - involve security if needed.
 - Advise the employee about workplace wellbeing and occupational health.

Appendix D – Information About Services Available in Sheffield

Please note - The information in this section was correct when the policy was updated in June 2023. Information and contact details do change however. If you find that you cannot contact a service listed please speak to the SHSC Safeguard Office on **0114 2718418** they will have the most up to date information available.

Sheffield Domestic Abuse Partnership Website

The Sheffield Domestic Abuse Partnership Website found <http://sheffielddact.org.uk/domestic-abuse> contains a range of information, it has a hide your tracks and leave this website button for people who may be concerned about an abuser finding out that they have used the site.

The web site also provides details of a range of services – please use this web site as it will have the most up to date information available.

Independent Domestic Abuse Services (IDAS) - Sheffield Domestic Abuse Helpline

Sheffield Domestic Abuse Helpline on 0808 808 2241

E-mail info@idas.org.uk

This is available 8am – 8pm (not bank holidays), Saturday 9am - 5pm

The helpline offers:

- Advice, support and safety for people experiencing domestic and sexual abuse
- A service to women, men, children, young people, practitioners and worried family members
- Up-to-date access to services in Sheffield and available refuge spaces

They also have a live chat option available 1pm-4pm via their website found <https://idas.org.uk/contact> This is run by a trained practitioner.

Appendix E – Information about National Services

Emergency Injunctions

The National Centre for Domestic Violence will support someone to obtain an emergency injunction free of charge. They also provide a range of resources that can be ordered free of charge. This service is available regardless of financial circumstances, race, gender or sexual orientation.

Please visit their website found <https://www.ncdv.org.uk/contact> for the most up to date contact details

Forced Marriage

Detailed information and Guidance about forced marriage is available from the Government Forced Marriage Unit found <https://www.gov.uk/guidance/forced-marriage>

National Men's Advice Line

A national helpline for men experiencing domestic abuse website found <https://mensadviceline.org.uk> Their telephone number is **0808 801 0327**

Respect Phone line

Helpline for perpetrators who want to stop abusive behaviour. The Respect website can be found <https://www.respect.uk.net>. Respect also provides support for male victims of domestic abuse. Their telephone number is **0808 802 4040**.

Galop

For Information for Lesbian Gay or Bisexual or Trans people experiencing domestic abuse visit the Galop website found <https://galop.org.uk>. Their telephone number is **0300 999 5428**.

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?	
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?	NA
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?	Yes
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)	Yes
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