

## **Working Time Regulations Policy** **(Including Secondary Employment)** Policy reference – HR017

SUMMARY	This document sets out the CCG's Working Time Regulations and Secondary Employment procedures. It has been drafted to comply with statutory requirements and imposes responsibilities on both line managers and employees to ensure that working time conditions and safe working arrangements are observed. This policy outlines those responsibilities as well as providing guidance on how the working time regulations apply to the CCG and its employees.
AUTHOR	Human Resources
VERSION	2.0 FINAL
EFFECTIVE DATE	July 2018
APPLIES TO	This policy applies to all employees of the CCG. The Working Time Regulations also cover workers whilst they are working at the CCG, for example agency Workers and some contractors.
APPROVAL COMMITTEE	CCG Remuneration Committee
REVIEW DATE	July 2021

***This policy has been aligned to Greater Huddersfield and North Kirklees CCG's in light of shared staff working across the CCG's.***

**THIS POLICY HAS BEEN SUBJECT TO AN EQUALITY IMPACT ASSESSMENT**

**VERSION CONTROL SHEET**

<b>Version</b>	<b>Date</b>	<b>Author</b>	<b>Status/Approval Body</b>	<b>Circulation</b>
0.1	Sept 2013	Paul Appleyard	Draft	Creation of core elements
0.2	08.09.2014	Kelly Brook	Draft	Prepared for SMT
0.3	24.09.2014	Matthew Hammonds	Draft	Updated following comments from SMT
0.4	29.10.2014	Stacey White	Draft	Updated following comments from SPF
1.0	18.12.2014	Kelly Brook	Final	Minor amends following Remuneration Committee
1.1	12.03.2018	Tazeem Hanif	Draft	Revised policy aligned to GH/NK CCG's submitted to SMT for comment – policy approved.
1.2	25.04.2018	Tazeem Hanif	Draft	Policy agreed electronically by Trade Unions at the Social Partnership Forum
2.0	19.07.2018	Tazeem Hanif	Final	Policy approved by the Remuneration Committee, in line with the electronic policy approval process.

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## **1. POLICY STATEMENT**

- 1.1 This document sets out the Clinical Commissioning Group (CCG's) standard working time regulations and secondary employment procedures. It has been drafted to comply with statutory requirements and should be read together with other relevant CCG policies, procedures and local guidance.
- 1.2 The monitoring and enforcement of working time regulations (WTR) is a vital tool in ensuring the working time and working patterns of employees of the CCG are conducive to a healthy workplace for both staff and patients.
- 1.3 The Working Time Directive 1998 sets out minimum conditions relating to weekly working time, rest entitlements, annual leave, and makes special provision for working hours and health assessments.
- 1.4 The Directive imposes responsibilities on both line managers and employees to ensure that working time conditions and safe working arrangements are observed. This policy outlines those responsibilities as well as providing guidance on how the working time regulations apply to the CCG and its employees.

## **2. SCOPE**

- 2.1 This policy applies to all employees of the CCG. The WTR also covers workers whilst they are working at the CCG, for example agency workers and some contractors.
- 2.2 Where the employee has more than one job, both employers are responsible for enforcing the 48 hour week.
- 2.3 The term employee will be used throughout this policy and will apply to both employee and workers.

## **3. RESPONSIBILITY**

- 3.1 Good working relations are vital for the CCG to operate successfully and provide services. There is a joint responsibility for management, Trade Unions and employees to accept the responsibility of working together on issues in good faith and with the shared intention of facilitating good working relations. Both management and Staff Side representatives would wish to discourage any individual from exceeding the 48 hours per week maximum average.

### **3.2. Line Managers**

The key responsibilities for line managers include:

- Acting fairly and consistently with the application of this policy. Line managers are responsible for ensuring that employees are made aware of this policy and understand their responsibilities in relation to it;
- Responsibility in ensuring that the service, including patient care, is not affected because someone is working above the maximum average weekly limit. If a line manager is concerned it must be discussed with the employee and advice sought from the HR team, where appropriate;
- Ensuring that the safety of the individual, colleagues and patients are not put at additional risk by the individual's request to opt out of the WTR. Advice may be sought from the HR team and an appropriate risk assessment undertaken;
- Responsible for monitoring hours worked internally. If an employee also works in secondary employment they should only work a maximum of 48 hours per week in both jobs;

- When in receipt of a secondary employment declaration form (appendix 3), line managers must meet with the employee to discuss the secondary employment;
- Responsibility to deal with any declarations in a timely manner and seek clarification from HR where appropriate;
- Give due consideration to operational business needs and personal circumstances before granting permission to undertake secondary employment. The line manager should also consider the points set out in 10.2

### **3.3. Employees**

It is the responsibility of the employee to ensure that they are:

- Responsible for complying with the policies and procedures and raising any questions or concerns with their line manager or the HR team;
- Adhere to the WTR and take responsibility for the health and safety of themselves and of others;
- Seek permission from the CCG before undertaking any secondary employment elsewhere by using the form found in appendix 3. (See appendix 2 for definitions of secondary employment);
- Sign a declaration and an 'opt out' form where appropriate as part of the appointment documentation or the form found in appendix 3 and 4 for existing employees. Where an employee wishes to "opt out" because of secondary employment, they must seek permission from their line manager. This must be done by completing the form in appendix 4, and making a declaration of their secondary employment in writing, stating whether it is for a specific period or indefinitely;
- Give 7 day's written notice if they wish to end the agreement to opt out;
- Failure to declare secondary employment may be dealt with under the CCG's Disciplinary Policy and Procedure;
- Complete a new secondary employment declaration form if the details of their secondary employment change;
- Ensure that total working hours do not exceed the limit as set out in the WTR unless an opt out form has been signed. Employees must comply with the required rest periods as set out in the WTR and any secondary employment should not compromise this under any circumstances. If a line manager does not approve a secondary employment request because of these concerns and an employee continues to undertake the work, this may be dealt with under the Disciplinary Policy and Procedure as refusal to comply with a reasonable management request.

### **3.4. Human Resources**

The key responsibilities for Human Resources are:

- Working in partnership with line managers and Staff Side representatives to ensure employees are treated fairly and consistently within the framework of the policy.
- Advising line managers of options available should an employee be managed under this policy.
- Recording on the personnel file any employee who has opted out of the maximum working week due to secondary employment and the expiry date of the opt-out agreement.

#### **4. EQUALITY STATEMENT**

- 4.1. In applying this policy, the CCG will have due regard for the need to eliminate unlawful discrimination, promote equality of opportunity, and provide for good relations between people of diverse groups, in particular on the grounds of the following characteristics protected by the Equality Act (2010); age, disability, sex, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, carers and sexual orientation. A consistent Equality Impact Assessment is used for all policies and procedures.

#### **5. ACCOUNTABILITY**

- 5.1. The Chief Officer is accountable for this policy.

#### **6. IMPLEMENTATION AND MONITORING**

- 6.1. The Remuneration Committee is responsible for the formal approval of this policy. Following approval, the policy will be disseminated to staff via internal communication methods and available through the staff intranet.
- 6.2. The policy and procedure will be reviewed periodically by the HR Team in conjunction with Trade Union representatives. Where review is necessary due to legislative change, this will happen sooner.

#### **7. PRINCIPLES OF THE WTR & SECONDARY EMPLOYMENT**

- 7.1. The WTR came into force in the United Kingdom on 1st October 1998. They were introduced as a health and safety measure and cover rest periods, working time limits, night work, secondary employment and annual leave. They control both hours of work, and the pattern in which work can be organised.

#### **8. WORKING TIME LIMITS**

- 8.1. An employee must not work more than an average of 48 hours per week, calculated over a 17-week reference period. The reference period will be a rolling one, for all employees.
- 8.2. In exceptional circumstances for those health professionals providing continuous care relating to reception, treatment or care of patients, the reference period may be extended to a maximum of 26 weeks with the agreement of the relevant Trade Union and management representative.
- 8.3. Young workers may not work more than 8 hours a day or 40 hours a week. These hours cannot be averaged out, and there is no opt-out available

## **9. REST PERIODS**

9.1. Employees are entitled to daily and weekly rest periods and in work rest breaks.

- A daily rest period of not less than 11 consecutive hours in each 24-hour period during which the employee works.
- A weekly rest period of not less than 35 hours (including the 11 hours of daily rest) in each 7-day period. This may be averaged over 2 weeks i.e. 2 days' rest over a fortnight.
- A minimum uninterrupted break of 20 minutes if your daily working time exceeds 6 hours. The break is unpaid.
- Young workers are entitled to an unpaid break of 30 minutes if they work a 4½-hour period. They are entitled to a daily rest period of 12 consecutive hours in each 24-hour period and to 48 hours' uninterrupted rest in any 7-day period.

9.2. It is worth noting that breaks are intended to be taken as rest periods during the working day. They cannot therefore be used at the beginning or end of the working day in order that employees may delay their start or finish early.

9.3. If employees cannot take their daily & weekly rest periods for business reasons & agreed with their line manager, they are entitled to compensatory rest. Unless there are exceptional circumstances, equivalent periods of compensatory rest should be given. Exceptional circumstances would include a need to provide security or protect persons or property, a foreseeable surge in activity e.g. winter pressures, or unforeseen circumstances beyond the employers control, e.g. unexpected weather or pandemic which demand extra work to be carried out.

9.4. Compensatory rest should be taken as soon as is reasonably practicable, and normally within 2 weeks.

## **10. SECONDARY EMPLOYMENT**

10.1. When an employee declares an interest in secondary employment a meeting will take place to discuss the implications on the service and working time regulations before an agreement is made.

### **10.2. CURRENT EMPLOYEES**

10.2.1. Before granting permission to undertake secondary employment the Line Manager should consider the following:

- Potential conflicts of interest
- The Working Time Regulations
- The employee's current performance
- The employee's attendance and capability in their role with the CCG & the potential impact secondary employment may have on attendance & performance
- Health and safety of individuals, colleagues and service users

10.2.2. If permission is granted and the combined number of hours across all employment exceeds 48 hours a week the line manager will ask the employee whether they wish to sign an opt out agreement (appendix 4). If the employee declines to sign an opt out agreement, advice must be sought by HR.

10.2.3. The line manager should take reasonable steps to remove the health and safety risk for instance by asking the employee to reduce hours being worked where this is possible or informing the other employer that the employee is exceeding the 48 hour limit. Declarations of secondary employment and opt out forms must be kept on the employees personal file for record purposes. Line managers will monitor secondary employment to ensure this does not adversely affect their ability to satisfactorily perform their work for the organisation or put health and safety at risk.

### 10.3. NEW STARTERS

10.3.1. During the recruitment process the line manager must establish if candidates intend to continue with any secondary employment both inside and outside of the CCG. If the successful candidate does intend to continue with any secondary employment the appointing manager should discuss with the candidate the nature of the secondary employment and consider the following points before agreeing that the secondary work to continue should the candidate wish to take up the post with the CCG:

- Potential conflicts of interest
- The Working Time Regulations
- Health and Safety of individuals, colleagues and service users

10.3.2. Employees must not undertake their secondary employment whilst on sick leave from the CCG, unless a GP fit note states otherwise. This includes any work during “off peak” periods, e.g. weekends and evenings.

10.3.3. If an employee wishes to continue with voluntary work whilst off sick they must request permission in writing from their line manager. The employee should outline in the request the nature of the work they wish to undertake, the number of hours they intend to work and confirm that no payment will be received for this work (excluding expenses). The line manager must seek advice from HR in this situation and obtain advice from the Occupational Health Service. Permission may be granted based on the fact that it is beneficial to the employee’s recovery and wellbeing to undertake the voluntary work.

10.3.4. Failure to adhere to this policy whilst on sick leave may result in disciplinary action which could lead to dismissal. Contravening this policy could also be considered fraud, in which case the matter would be referred to the Local Counter Fraud Specialist.

## 11. RETRACTION OF PERMISSION TO UNDERTAKE SECONDARY EMPLOYMENT

11.1. There may be circumstances where it is necessary for the CCG to retract its’ agreement for a member of staff to undertake secondary employment. Examples of these are outlined below:

- **Attendance / Time keeping** - Where attendance or time-keeping is of concern, and is considered attributable to secondary employment, the CCG reserves the right to retract any permission given to an employee to undertake secondary employment.
- **Performance** – Line managers must monitor the performance of their employees. If performance falls below acceptable standards and the performance management procedure has been invoked, the CCG reserve the right to retract any permission given to an employee to undertake secondary employment if the secondary employment is deemed to contribute to the poor performance.



- **A new Conflict of Interest** - There may be times where a new conflict of interest has arisen that did not previously exist when a new employee was appointed or when permission was given by the CCG for an employee to undertake secondary employment. Employees have a responsibility to highlight any new potential conflicts of interest that arise or may arise with their line manager. The line manager must assess the risk of the potential conflict of interest and if anything can be put in place to prevent the conflict of interest (i.e. removing the employee from a certain project etc.). If this cannot be avoided and the risk to the CCG and service delivery is too high, permission to undertake secondary employment may be retracted.

## **12. ON CALL**

- 12.1. For the purpose of the WTR working time will not start until the employee on call receives a call to go to work immediately, or responds to a call to deal with an incident over the phone and continues for the period they are working.

## **13. ANNUAL LEAVE**

- 13.1. Under the WTR, an employee is entitled to a minimum of 28 days paid leave per annum, including bank holidays.
- 13.2. Employees are encouraged to take their full contractual annual leave as per their contract of employment. For health and safety reasons employees must as a minimum take their full statutory holiday entitlement allowance.
- 13.3. Further information on annual leave entitlements, these are set out in the Agenda for Change Service Handbook, and in the CCG's Annual and Special Leave Policy.

## **14. APPEAL**

- 14.1. If an employee considers that they have been unfairly treated with regard to their working hours, they are requested to raise this informally with their line manager in the first instance. If the employee is not satisfied following this route, they reserve the right to invoke the grievance procedure in accordance with the CCG's Grievance Policy.

## **15. RECORDS**

- 15.1. Line managers and HR are responsible for ensuring records of secondary employment, any changes which may affect this and documented reasons if permission is retracted is kept on personnel files as well as other documentation regarding working time limits.

## Appendix 1 - DEFINITIONS OF WORKING TIME (NOT EXHAUSTIVE)

Term	Definition
<b>Employee</b>	This is defined as someone who has a contract of employment with the CCG, or any other contract, whether expressed or implied and whereby the individual undertakes to do or perform personally any work or services for the CCG. The term employee will be used throughout this policy and will apply to both employee and workers.
<b>Working Time</b>	<p>This means working at their employer's disposal and carrying out activities or duties such as:</p> <ul style="list-style-type: none"> <li>• Any period during which an employee is working;</li> <li>• Any period during which an employee is receiving relevant training ;</li> <li>• Travelling time whilst on CCG business.</li> </ul> <p>This excludes annual leave, sick leave, maternity /adoption leave as the employee is not required to carry out any duties during these times. In addition to additional hours employees choose to work without being worked by/or without the agreement of their Line manager.</p>
<b>On Call</b>	Counts as working time from when the employee is called upon to undertake any work related activity up until the time the employee returns home or finishes advising over the telephone. Working time does not include time spent at home whilst "on call", during which non-work related leisure activities can be pursued.
<b>Travel to Allocated Base</b>	Not classed as working time, however travel between bases during the working day would be classed as working time, unless terms and conditions specify otherwise. Any travel in connection with business would be classed as working time.
<b>Rest Break</b>	Means an uninterrupted break that is taken during the working day. Not classed as working time, except where individuals are required to work during meals.
<b>Rest Period</b>	Means a period which is not working time, other than a break or leave to which the employee is entitled.
<b>Civic and Public Duties</b>	If employees receive paid time off these would be classed as working time.
<b>Trade Union Duties</b>	If employees receive paid time off it would be classed as working time. Representatives should take some personal responsibility for ensuring that their contracted hours and trade union duties do not exceed an average of 48 hours per week.
<b>Work Related Study Leave</b>	Any period during which employees are receiving relevant training. This includes work experience provided pursuant to a training course or programme, and training for employment. It does not include non-job-related evening classes or day release courses.

<b>Voluntary Work</b>	Activity that involves spending time, unpaid, doing something that aims to benefit the environment or someone (individuals or groups) other than, or in addition to, close relatives. Central to this definition is the fact that volunteering must be a choice freely made by each individual.
<b>Young Worker</b>	Over school leaving age but under the age of 18

*Please seek advice from your line manager or HR, if you are unsure if this exception applies to you.*

## Appendix 2 - DEFINITIONS OF SECONDARY EMPLOYMENT (NOT EXHAUSTIVE)

The term 'Secondary Employment' in this policy covers:

- Paid employment outside of the CCG.
- Paid employment within the CCG in a different service.
- Voluntary work outside of the CCG - (***volunteering is any activity that involves spending time, unpaid, doing something that aims to benefit the environment or someone (individuals or groups) other than, (or in addition to), close relatives. Volunteering is a choice freely made by each individual. This can include formal activity undertaken through public, private and voluntary organisations as well as informal community participation.***)
- Self-employment.
- Bank / Locum / Agency Work / Voluntary work.
- Reservist Occupations.

### Appendix 3 - DECLARATION OF SECONDARY EMPLOYMENT

1. I do / do not (delete as appropriate) have secondary employment / private practice
2. I undertake to notify any changes to my line manager

<b>PERSONAL DETAILS - To be completed by the employee:</b>	
Full name:	
Job title:	
Department:	
CCG Employed by and work location:	
Number of contracted hours per week for the CCG:	
Pattern of work and days worked:	

<b>OTHER EMPLOYMENT/WORK DETAILS - I have other employment / work or I am considering other employment work including Bank/ Locum / Agency work. The details of which are below:</b>	
Name of employer:	
Nature of employment: (please indicate): <ul style="list-style-type: none"><li>• Paid</li><li>• Unpaid</li><li>• Voluntary</li><li>• Casual</li></ul>	
Average hours per week (average based on a 17 week period)	
Date commenced:	

## DECLARATION

I declare that the above information is correct and that secondary employment in this instance will not have a detrimental effect on my work at the CCG. I will inform my line manager if there are any changes to the above.

I understand that false information given with regard to this policy could be treated as gross misconduct or fraudulent and dealt with accordingly under the Disciplinary Policy and Procedure/Local Counter Fraud procedures. To prevent and detect fraud, I consent to the disclosure of relevant information from this form to and by the CCG's Local Counter Fraud Specialist and the NHS Counter Fraud Authority.

I understand that I must not undertake any secondary employment whilst receiving sick pay from the CCG unless specifically authorised to do so by my employer and specified in a GP "Fit Note"

I have read and understand the CCG's Working Time Regulations Policy and the CCG's Code of Business Conduct as it relates to conflicts of interest and I agree to comply with its requirements to declare secondary employment.

I declare that the information I have provided on this form is correct and complete:

Name:	
Signature:	
Date:	

Thank you for completing this form, please ensure that it is returned fully completed and signed to your line manager.

### To be completed by the line manager.

Declaration	Application approved	Application not approved
Comments:		
Name of line manager:		
Job Title:		
Signature:		
Date:		

## Appendix 4 - WORKING TIME REGULATIONS 1998 OPT OUT AGREEMENT

The Working Time Regulations define working time as when someone is “working, at his/her employer’s disposal and carrying out his/her activity or duties.” This incorporates:

- Working lunches i.e. business lunches.
- If you have to travel as part of your work during working time.
- If you are engaged in job-related training.

You may agree to work more than 48 hours a week but cannot be forced or expected to work more than this limit. You cannot be dismissed or discriminated against for refusing to sign an opt out statement.

Should you wish to work more than the 48 hour week average, please sign the following opt-out agreement and return it to your line manager. Your line manager will then forward a copy of this to HR.

<b>Agreement</b>	
I hereby give you notice that I am willing to work, more than an average of 48 hours a week. In opting out of the 48-hour limit, I agree that I will not work excessively long hours where this may be a risk to the health and safety of my colleagues, the public or myself. This agreement is to remain effective for an indefinite period and I understand that should I wish to terminate this agreement, I can do so at any time by providing my line manager with written notice of my intention to do so.	
Name of Employee:	
Job Title:	
Team:	
Signature:	
Date:	

*Employees should be aware that the CCG reserves the right to not accept an Opt Out Form if it believes the health and safety of any employee or patients is likely to be affected.*

## Appendix 5 - Equality Impact Assessment

<b>Title of policy</b>	Working Time Regulations Policy		
<b>Names and roles of people completing the assessment</b>	Tazeem Hanif – HR Business Partner Kym Brearley, Equality and Diversity Advisor		
<b>Date assessment started/completed</b>	March 2018	04.04.2018	
<b>1. Outline</b>			
<b>Give a brief summary of the policy</b>	This document sets out the CCG's standard working time regulations and includes staff undergoing secondary employment. It has been drafted to comply with statutory requirements.		
<b>What outcomes do you want to achieve</b>	The policy to comply with statutory requirements and complies with NHS Litigation Authority Standards and best practice.		
<b>2. Analysis of impact</b>			
This is the core of the assessment, using the information above detail the actual or likely impact on protected groups, with consideration of the general duty to; eliminate unlawful discrimination; advance equality of opportunity; foster good relations			
	<b>Are there any likely impacts? Are any groups going to be affected differently? Please describe.</b>	<b>Are these negative or positive?</b>	<b>What action will be taken to address any negative impacts or enhance positive ones?</b>
<b>Age</b>	Yes – in complying with The Working Time Directive 1998, this policy requires young workers between the ages of 16-18 to be treated differently to workers above the age of 18 years: they are required to work fewer hours than adults. Older workers may therefore consider themselves to receive less favourable treatment than young workers.	Negative	The potentially negative impact on older workers can be justified as a proportionate means of achieving a legitimate aim i.e. compliance with the law. Whilst the CCG does not currently employ anyone in this age group, the policy is written to adhere to the legislation with regard to this. The CCG will continue to monitor this in line with the policy.
<b>Carers</b>	No		
<b>Disability</b>	Yes – some employees with a disability or long-term health condition e.g. mental health may benefit from undertaking secondary employment or voluntary work whilst on sick leave from the CCG e.g. to support their physical and mental health and wellbeing, and facilitate their return to work at the CCG .	Negative	The policy explains the procedure for employees wishing to undertake secondary employment or continue with voluntary work whilst on sick leave from the CCG.



<b>Sex</b>	No		
<b>Race</b>	No		
<b>Religion or belief</b>	No		
<b>Sexual orientation</b>	No		
<b>Gender reassignment</b>	No		
<b>Pregnancy and maternity</b>	No		
<b>Marriage and civil partnership</b>	No		
<b>Other relevant group</b>	Yes – all employees	Positive	The policy sets out the appeal procedure employees should follow, if they consider they have been treated unfairly under this policy.
<b>If any negative/positive impacts were identified are they valid, legal and/or justifiable? Please detail.</b>			
Mitigating actions are identified for equality groups who are adversely affected. For age, the adverse impact can be justified as a proportionate means of achieving a legitimate aim (i.e. compliance with the law). The policy is applicable to all employees and adheres to the NHS Litigation Authority Standards, statutory requirements and best practice. Makes all reasonable provision to ensure equity of access to all employees.			
<b>4. Monitoring, Review and Publication</b>			
<b>How will you review/monitor the impact and effectiveness of your actions</b>	Will monitor applications of opt-out applications and secondary employment to ensure that there is no detriment suffered by any employee with a protected characteristic.		
<b>Lead Officer</b>	Tazeem Hanif	<b>Review date:</b>	July 2021
<b>5. Sign off</b>			
<b>Lead Officer</b>	Kym Brearley		
	<b>Date approved:</b>	04.04.2018	