

## **DUNDEE CITY COUNCIL**

**REPORT TO:** SOCIAL WORK AND HEALTH COMMITTEE – 19<sup>TH</sup> MAY 2014

**REPORT ON:** SCOTTISH GOVERNMENT CARERS LEGISLATION -  
CONSULTATION ON PROPOSALS

**REPORT BY:** DIRECTOR OF SOCIAL WORK

**REPORT NO:** 216 - 2014

### **1.0 PURPOSE OF REPORT**

1.1 This report provides elected members with information about the Social Work Department Officers' response to Scottish Government Carer's Legislation – Consultation on Proposals.

### **2.0 RECOMMENDATIONS**

It is recommended that the Social Work and Health Committee:

- 2.1 To approve the recently submitted Social Work Department Officers' response to the Scottish Government's Carer's Legislation – Consultation on Proposals, as appended to the report.
- 2.2 Instruct the Director of Social Work to provide information to Committee on any subsequent implications arising from the outcome of Scottish Government consultation.

### **3.0 FINANCIAL IMPLICATIONS**

3.1 Scottish Government will set out financial implications within a Financial Memorandum once the proposed Carers Bill is drafted. Any direct financial implications resulting from Financial Memorandum will be reported to Committee at a later date.

### **4.0 MAIN TEXT**

#### **4.1 Background to the Consultation on the Carers Legislation – Consultation on Proposals**

On 27<sup>th</sup> January 2014 the Scottish Government published a consultation document outlining proposals to be contained within Carers legislation. Views on the content, purpose and effect of the proposed Carers Legislation been sought. All submissions in response to the Carers Legislation Consultation on Proposals were required to be lodged with the Scottish Government by 16<sup>th</sup> April 2014.

## 4.2 **Consultation Arrangements**

During the consultation period, the Social Work Department, on behalf of the Council, gained views of Carers by way of a consultation event organised by Carers Voice and views of representatives from Social Work, Contracts and Commissioning, 3<sup>rd</sup> Sector by way of a focus group discussion on the consultation questions. Views from these groups helped to form the Social Work Department's response to the consultation.

## 4.3 **Scope of the Scottish Government Carers Legislation – Consultation on Proposals**

The consultation pays particular attention to the following areas:

- The Carer's Assessment (the Carer's Support Plan)
- Information and Advice
- Support to Carers (other than information and advice)
- Stages and Transitions
- Carer Involvement: a) Service Design and Delivery b) Care Planning and Support
- Planning and Delivery: a) Carers Strategies b) Diversity and Equality in Provision
- Identification of Carers and Young Carers
- Carer and Cared-for Person(s) in Different Local Authority Areas

## 5.0 **POLICY IMPLICATIONS**

5.1 This Report has been screened for any policy implications in respect of Sustainability, Strategic Environmental Assessment, Anti-Poverty, Equality Impact Assessment and Risk Management.

5.2 An Equality Impact Assessment is attached to this report.

## 6.0 **CONSULTATIONS**

6.1 The Chief Executive, Director of Corporate Services and Head of Democratic and Legal Services were consulted in the preparation of this report.

## 7.0 **BACKGROUND PAPERS**

7.1 None.

Jennifer G Tocher  
**Director of Social Work**

**Date:** 7<sup>th</sup> May 2014



The Scottish Government  
Riaghaltas na h-Alba

## Consultation on Carers Legislation

### RESPONDENT INFORMATION FORM

**Please Note** this form **must** be returned with your response to ensure that we handle your response appropriately

#### 1. Name/Organisation

##### Organisation Name

Dundee City Council

**Title** Mr  Ms  Mrs  Miss  Dr  **Please tick as appropriate**  
**Surname**

Tocher

##### Forename

Jenni

#### 2. Postal Address

Social Work Department, Dundee City Council

Claverhouse East

Jack Martin Way

Dundee

**Postcode** DD4 9 FF

**Phone** 01382 434000

Jenni.Tocher@dundeecity.gov.uk

#### 3. Permissions - I am responding as...

**Individual**

**Group/Organisation**

**Please tick as appropriate**

(a) Do you agree to your response being made available to the public (in Scottish Government library and/or on the Scottish Government web site)?

**Please tick as appropriate**

**Yes**  **No**

(b) Where confidentiality is not requested, we will make your responses available to the public on the following basis

(c) The name and address of your organisation **will be** made available to the public (in the Scottish Government library and/or on the Scottish Government web site).

Are you content for your **response** to be made available?

**Please tick ONE of the following boxes**

**Please tick as appropriate**  
 **Yes**  **No**

Yes, make my response, name and address all available

**or**

Yes, make my response available, but not my name and address

**or**

Yes, make my response and name available, but not my address

**(d)** We will share your response internally with other Scottish Government policy teams who may be addressing the issues you discuss. They may wish to contact you again in the future, but we require your permission to do so. Are you content for Scottish Government to contact you again in relation to this consultation exercise?

**Please tick as appropriate**

**Yes**

**No**

## CONSULTATION QUESTIONS

### The Carer's Assessment: Carer's Support Plan

Question 1: Should we change the name of the carer's assessment to the Carer's Support Plan?

**Yes**

**No**

Comments:

Dundee City Council considers that the name should be changed to Carers Support Plan. Carers were consulted at an event on 24<sup>th</sup> March 2014 and the majority of Carers considered that it should be changed.

Question 2: Should we remove the substantial and regular test so that all Carers will be eligible for the Carer's Support Plan?

Yes

No

Comments:

Dundee City Council supports this position. Dundee City Council already has a policy of undertaking assessments for any Carer who requests it. Carers were consulted at an event on 24th March 2014 and the majority of Carers considered that all Carers should be eligible for the Carer's Support Plan. We also consider that the Carers Support Plan should be required to focus on Carers personal outcomes and Scottish Government should be expected ask Local Authorities to demonstrate improvement in Carers Outcomes. Scottish Government should be expected to ensure sufficient monies are made available from central sources to support this provision.

Question 3: Should we remove that part of the existing carer assessment process whereby the cared-for person is a person for whom the local authority must or may provide community care services/children's services?

Yes

No

Comments:

Dundee City Council supports the position that the person being cared for should not have to qualify for Local Authority support to get a Carer's assessment. Dundee City Council already has a policy of undertaking assessments for any Carer who requests it. Carers were consulted at an event on 24th March 2014 and the majority of Carers considered that all Carers should be eligible to have a Carer's Support Plan regardless of whether the cared for person is a person for whom the local authority must or may provide community care services/children's services. Scottish Government should be expected to ensure sufficient monies are made available from central sources to support this provision.

Question 4: Should we introduce two routes through to the Carer's Support Plan – at the carer's request and by the local authority making an offer?

Yes

No

Comments:

Dundee City Council supports this position. Currently Dundee City Council already has a policy of undertaking assessments for any Carer who requests it and by assessment staff making an offer. We considered that Local Authorities should continue be able to discharge powers/ duties to 3<sup>rd</sup> Sector or NHS Boards to complete a Carers Support Plan to be able to respond to individual Carers circumstances and choices.

Question 5: Should we remove from statute the wording about the carer's ability to provide care?

Yes

No

Comments:

Dundee City Council supports this position. Carers were consulted at an event on 24th March 2014 and the majority of Carers considered that the wording regarding ability to provide care should be removed. Dundee City Council suggests, however, that wording should be included which makes reference to risks and support needed to achieve Carer's outcomes. As noted above, we also consider that the Carers Support Plan should be required to focus on Carers personal outcomes and Scottish Government should be expected ask Local Authorities to demonstrate improvement in Carers Outcomes.

Question 6: Should we introduce a duty for local authorities to inform the carer of the length of time it is likely to take to receive the Carer's Support Plan and if it exceeds this time, to be advised of the reasons?

Yes

No

Comments:

Dundee City Council supports this position. We suggest that a maximum waiting time from the request for the Carers support plan is provided by Scottish Government and where this is not possible that the Local Authority provides reasons. As noted above, we also consider that the Carers Support Plan should be required to focus on Carers personal outcomes and Scottish Government should be expected ask Local Authorities to demonstrate improvement in Carers outcomes. Scottish Government should be expected to ensure sufficient monies are made available from central sources to support this provision.

Question 7: How significant an issue is portability of assessment for service users and Carers?

Comments:

Dundee City Council consider that the Carer should be able to bring their agreed Carers Support Plan to another local area, should they move and this support plan should then be considered by the receiving local area, who will take into account local circumstances and supports when implementing the plan. Scottish Government should be expected to ensure sufficient monies are made available from central sources to support this provision.

Question 8: Should the Scottish Government and COSLA with relevant interests work together to take forward improvements to the portability of assessment?

Yes

No

Comments:

The Dundee City Council supports this position and considers that partnership approaches are essential towards enabling Carers to meet their outcomes. We are of the view however, that local circumstances, local support arrangements and Carers personal choice will inform the development and implementation of the support plan and this should be included in any discussions.

## Information and Advice

Question 9: Should we introduce a duty for local authorities to establish and maintain a service for providing people with information and advice relating to the Carer's Support Plan and support for Carers and young Carers?

Yes

No

Comments:

Dundee City Council supports this position. Carers were consulted at a consultation event on 24th March 2014 and all Carers considered that it should be made a duty for the Local Authority to provide accurate, up to date and adequate information and advice services. We consider this would also support existing duties embodied in the Social Work (Scotland) Act 1968. We considered that Local Authorities should be able to discharge this function to 3<sup>rd</sup> Sector or NHS Boards as required by local circumstances to meet this duty. Scottish Government should be expected to ensure sufficient monies are made available from central sources to support this provision.

Question 10: Should we repeal section 12 of the Community Care and Health (Scotland) Act 2002 about the submission of Carer information Strategies to Scottish Ministers, subject to reassurances, which are subject in turn to Spending Review decisions, about the continuation of funding to Health Boards for support to Carers and young Carers?

Yes

No

Comments:

Dundee City Council considers that a joint strategic commissioning approach is required instead of a carer information strategy and this should be should be completed in line with JIT guidance. (The National Steering Group agreed the following definition of strategic commissioning. ***Strategic commissioning is the term used for all the activities involved in assessing and forecasting needs, links investment to agreed desired outcomes, considering options, planning the nature, range and quality of future services and working in partnership to put these in place.*** Joint commissioning is where these actions are undertaken by two or more agencies working together, typically health and local government, and often from a pooled or aligned budget.)



## Support to Carers (other than information and advice)

Question 11: Should we introduce a duty to support Carers and young Carers, linked to an eligibility framework?

Yes

No

Comments:

Dundee City Council supports this position. Carers were consulted at an event on 24th March 2014 and all Carers considered a duty should be introduced to support Carers and young Carers, linked to an eligibility framework. We also considered that Local Authorities should be able to discharge this function to 3<sup>rd</sup> Sector or NHS Boards as required by local circumstances and to enable promotion of Carers choice. Scottish Government should be expected to ensure sufficient monies are made available from central sources to support this provision.

Question 12: Alternatively, should we retain the existing discretionary power to support Carers and young Carers?

Yes

No

Comments: No – see above

Question 13: Should we introduce a duty to provide short breaks?

Yes

No

Comments:

Dundee City Council considers that support should be based on achieving Carers outcomes and promotion of Carers choice about type of support. We recognise that short breaks contribute to Carers outcomes but are not the only route. The feedback from Carers at a consultation event on 24<sup>th</sup> March was that Carers should be able to access to short break where this was identified as part of their support arrangements. Following this we consider that the legislation should encompass a **discretionary power** rather than a duty to provide short breaks to ensure that Carers are offered the choice about type of support they consider will be of most benefit. Scottish Government should be expected to ensure sufficient monies are made available from central sources to support this provision.

## Stages and Transitions

Question 14: Should we issue statutory guidance on the Carer's Support Plan which will include guidance for those undertaking the Carer's Support Plan on managing stages of caring? This would apply to adult Carers only. (For young Carers, practice guidance will be developed to support management of a Child's Plan through the stages of caring).

Yes

No

Comments:

Dundee City Council considers that support should be based on achieving Carers outcomes and promotion of Carers choice about type of support and will expect statutory guidance to be developed on this basis.

Question 15: Should new Carers' legislation provide for young Carers to have a Carer's Support Plan if they seem likely to become an adult carer? Any agreed support recorded in the Carer's Support Plan would be put in place after the young carer becomes a (young) adult carer.

Yes

No

Comments:

The Dundee City Council supports the position that all Carers should have a Carers support plan.

## Carer Involvement

Question 16: Should there be carer involvement in the planning, shaping and delivery of services for the people they care for and support for Carers in areas outwith the scope of integration?

Yes

No

Comments:

Dundee City Council consider that Carers should be involved in the strategic planning for the people they care for and support for Carers in line with strategic commissioning, planning and integration arrangements currently in place. We consider that should Carers be interested in being involved in planning, shaping and delivery of services outwith the scope of integration then there should be opportunities for this.

Question 17: Should we make provision for the involvement of Carers' organisations in the planning, shaping and delivery of services and support falling outwith the scope of integration?

Yes

No

Comments:

Dundee City Council consider that Carer organisations and other interested support organisations who support Carers in addition to their main role should be involved in the strategic commissioning and planning. We consider that should Carers organisation and other interested support organisations that support Carers in addition to their main role be interested in being involved in planning, shaping and delivery of services outwith the scope of integration then there should be opportunities for this.

Question 18: Should we establish a principle about carer and young carer involvement in care planning for service users (subject to consent) and support for themselves in areas not covered in existing legislation?

Yes

No

Comments:

Dundee City Council supports this position subject to service users consent and identification of any adult, child and public protection risks. The feedback from Carers at a consultation event on 24<sup>th</sup> March was that a principle of involvement should be established. We consider a collaborative approach is best practice, where it is clear that the carer and service user best interests are at the forefront.

Question 19: What are your views on making provision for young carer involvement in the planning, shaping and delivery of services for cared-for people and support for young Carers?

Comments:

Dundee City Council consider that young Carers should be involved in the strategic commissioning and planning for the people they care for through age appropriate consultation and involvement.

## Planning and Delivery

Question 20: Should we introduce statutory provision to the effect that a local authority and each relevant Health Board must collaborate and involve relevant organisations and Carers in the development of local Carers strategies which must be kept under review and updated every three years?

Yes

No

### Comments:

We consider that a joint strategic commissioning statement should be developed instead of a Local Carers strategy to ensure a focus on linking investment to agreed desired outcomes is undertaken as part of the strategic developments. This would also support a focus the achievement of Carers outcomes and achievement of proposed national health and social care outcomes.

The National Steering Group (JIT) agreed the following definition ***Strategic commissioning is the term used for all the activities involved in assessing and forecasting needs, links investment to agreed desired outcomes, considering options, planning the nature, range and quality of future services and working in partnership to put these in place.*** Joint commissioning is where these actions are undertaken by two or more agencies working together, typically health and local government, and often from a pooled or aligned budget.

Question 21: Should we introduce statutory provision to the effect that local authorities with Health Boards must take steps to ensure, in so far as is reasonably practicable, that a sufficient range of services is available for meeting the needs for support to Carers and young Carers in the area?

Yes

No

### Comments:

Dundee City Council considers that a sufficient range of supports should be developed based on achieving Carers outcomes and promotion of Carers choice about the type of support they consider will enable them to achieve their outcomes. We consider that implementation of a joint strategic commissioning approach will enable this happen.

We also consider that the proposed Carers legislation should make reference and where appropriate update the duties outlined in section 19 of the Social Care (Self Directed Support) (Scotland) Act 2013 with regards to Carers. Scottish

Government should be expected to ensure sufficient monies are made available from central sources to support this provision.

## Identification

Question 22: Should there be no legislative provision for GPs or local authorities to maintain a Carers Register in order to support the identification of Carers?

Yes

No

Comments:

Dundee City Council considers that identification and support should be based on achieving Carers outcomes. At a consultation event on 24<sup>th</sup> March, Carers considered that there should be a legislative provision to make NHS Boards and Local Authorities make arrangements to support the identification of Carers. We consider that in making this arrangement information about the numbers, support needs and demographics of Carers should be gained to support strategic planning and development of resources. Scottish Government should be expected to ensure sufficient monies are made available from central sources to support this provision.

Question 23: Should the Scottish Government ensure that good practice is widely spread amongst Health Boards about the proactive use of Registers of Carers within GP practices?

Yes

No

Comments:

Dundee City Council considers that identification and support should be based on achieving Carers outcomes and promotion of good practice, as opposed to a specific focus on Carers registers only.

Question 24: Should the Scottish Government ask Health Boards to monitor compliance with the core contractual elements of the GP contract?

Yes

No

Comments:

Dundee City Council supports this position. At a consultation event on 24<sup>th</sup> March, Carers considered that there should be legislation to make NHS Boards monitor compliance with core contractual elements of the GP Contract.

### **Carer and Cared-for Person(s) in Different Local Authority Areas**

Question 25: What are the views of respondents on the lead local authority for undertaking the Carer's Support Plan and agreeing support to the carer where the carer lives in a different local authority area to the cared-for person(s)?

Comments:

In line with question 7, the Dundee City Council consider that the Carer should be able to bring their agreed Carers Support Plan to another local area, should they move and this support plan should then be considered by the receiving local area, who will take into account local circumstances and supports when implementing the support plan. Scottish Government should be expected to ensure sufficient monies are made available from central sources to support this provision.

We also consider that Scottish Government should make reference to Scottish Government Ordinary Residence Guidance currently in place for users of services and amend and update this to reflect Carers support considerations.

Question 26: What are the views of respondents on which local authority should cover the costs of support to the carer in these circumstances?

Comments:

Dundee City Council consider that Scottish Government should make reference to Scottish Government Ordinary Residence Guidance currently in place for users of services and amend and update this to reflect Carers support considerations.

At a Carers consultation event on 24<sup>th</sup> March, Carers also suggested that Scottish Government should set up a central fund, which could be applied to, to cover these costs and ensure that support is provided regardless of Local Area of residence.

Question 27: Should the Scottish Government with COSLA produce guidance for local authorities?

Yes

No

Comments:

We consider that Scottish Government should make reference to Scottish Government Ordinary Residence Guidance currently in place for users of services and amend and update this to reflect Carers support considerations.

Additional Comment

We did note that the questions on this consultation form were out of sync with the easy read version and hard copy of the consultation, which may impact on the responses provided. We also had a concern that the easy read version did not accurately reflect the nature of questions being asked.

## EQUALITY IMPACT ASSESSMENT TOOL

### Part 1: Description/Consultation

<b>Is this a Rapid Equality Impact Assessment (RIAT)?</b>	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>
<b>Is this a Full Equality Impact Assessment (EQIA)?</b>	Yes <input type="checkbox"/>	No <input type="checkbox"/>
<b>Date of Assessment:</b>	25 <sup>th</sup> April 2014	
<b>Title of document being assessed:</b>	Committee Report Number: 216 - 2014 Scottish Government Carers Legislation Consultation on Proposals	
<b>1. This is a new policy, procedure, strategy or practice being assessed</b> (If yes please check box) <input checked="" type="checkbox"/>	<b>This is an existing policy, procedure, strategy or practice being assessed?</b> (If yes please check box) <input type="checkbox"/>	
<b>2. Please give a brief description of the policy, procedure, strategy or practice being assessed.</b>	Consultation on proposals for Carers Legislation by Scottish Government	
<b>3. What is the intended outcome of this policy, procedure, strategy or practice?</b>	Legislation by Scottish Government	
<b>4. Please list any existing documents which have been used to inform this Equality and Diversity Impact Assessment.</b>	Consultation by Scottish Government and Included with that their Equality Impact Assessment	
<b>5. Has any consultation, involvement or research with protected characteristic communities informed this assessment? If yes please give details.</b>	Yes – consultation with carers	
<b>6. Please give details of council officer involvement in this assessment.</b>  (e.g. names of officers consulted, dates of meetings etc)	Alexis Chappell, Service Manager	



<p><b>7. Is there a need to collect further evidence or to involve or consult protected characteristics communities on the impact of the proposed policy?</b></p> <p>(Example: if the impact on a community is not known what will you do to gather the information needed and when will you do this?)</p>	No
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**Part 2: Protected Characteristics**

**Which protected characteristics communities will be positively or negatively affected by this policy, procedure or strategy?**

**NB Please place an X in the box which best describes the "overall" impact. It is possible for an assessment to identify that a positive policy can have some negative impacts and visa versa. When this is the case please identify both positive and negative impacts in Part 3 of this form.**

**If the impact on a protected characteristic communities are not known please state how you will gather evidence of any potential negative impacts in box Part 1 section 7 above.**

	<b>Positively</b>	<b>Negatively</b>	<b>No Impact</b>	<b>Not Known</b>
<b>Race, Ethnic Minority Communities including Gypsies and Travellers</b>	✓	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<b>Gender</b>	✓	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<b>Gender Reassignment</b>	✓	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<b>Religion or Belief</b>	✓	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<b>People with a disability</b>	✓	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<b>Age</b>	✓	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<b>Lesbian, Gay and Bisexual</b>	✓	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<b>Socio-economic</b>	✓	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<b>Pregnancy &amp; Maternity</b>	✓	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<b>Other (please state)</b>	Carers	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

### Part 3: Impacts/Monitoring

<p><b>1. Have any positive impacts been identified?</b></p> <p>(We must ensure at this stage that we are not achieving equality for one strand of equality at the expense of another)</p>	<p>Yes increasing accessibility of support to carers and with that people with protected characteristics. Carers were consulted and their views are embedded in Dundee City Council responses to the consultation.</p>
<p><b>2. Have any negative impacts been identified?</b></p> <p>(Based on direct knowledge, published research, community involvement, customer feedback etc. If unsure seek advice from your departmental Equality Champion.)</p>	<p>No negative impacts have been identified. This consultation seeks views of carers and stakeholders and the proposals contained within the consultation aim to increase accessibility of support to carers.</p>
<p><b>3. What action is proposed to overcome any negative impacts?</b></p> <p>(e.g. involving community groups in the development or delivery of the policy or practice, providing information in community languages etc. See Good Practice on DCC equalities web page)</p>	<p>NA</p>
<p><b>4. Is there a justification for continuing with this policy even if it cannot be amended or changed to end or reduce inequality without compromising its intended outcome?</b></p> <p>(If the policy that shows actual or potential unlawful discrimination you must stop and seek legal advice)</p>	<p>The consultation has been proposed by Scottish Government. Scottish Government have completed an equalities assessment as part of the consultation. Dundee City Council response is informed by views of carers.</p>
<p><b>5. Has a 'Full' Equality Impact Assessment been recommended?</b></p> <p>(If the policy is a major one or is likely to have a major impact on protected characteristics communities a Full Equality Impact Assessment may be required. Seek advice from your departmental Equality lead.)</p>	<p>No</p>
<p><b>6. How will the policy be monitored?</b></p> <p>(How will you know it is doing what it is intended to do? e.g. data collection, customer survey etc.)</p>	<p>Through discussion with Scottish Government and review of next steps</p>

**Part 4: Contact Information**

<b>Name of Department or Partnership</b>	Social Work
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<b>Type of Document</b>	
Human Resource Policy	<input type="checkbox"/>
General Policy	<input type="checkbox"/>
Strategy/Service	<input type="checkbox"/>
Change Papers/Local Procedure	<input type="checkbox"/>
Guidelines and Protocols	<input type="checkbox"/>
Other	<input checked="" type="checkbox"/>

<b>Manager Responsible</b>	<b>Author Responsible</b>
<b>Name:</b> Alexis Chappell.	<b>Name:</b> Alexis Chappell
<b>Designation:</b> Service Manager	<b>Designation:</b> Service Manager
<b>Base:</b> Claverhouse Social Work Office	<b>Base:</b> Claverhouse Social Work Office
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<b>Signature of author of the policy:</b> Alexis Chappell	<b>Date:</b> 28 <sup>th</sup> April 2014
<b>Signature of Director/Head of Service:</b> Jennifer G Tocher	<b>Date:</b> 28 <sup>th</sup> April 2014
<b>Name of Director/Head of Service:</b> Jennifer G Tocher	
<b>Date of Next Policy Review:</b> N/A	