



# Members Handbook 2023

**A Co-operative approach to safe, quality care under your control and informed by your experience.  
'Together we can live life well'**

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## Our Service

### Our Values

In terms of the current language in use in social care North-West Care Co-Operative (NWCC) is registered by the Care Quality Commission as a Domiciliary Care Agency (DCA) and provides personal and social “care” to clients who are “in receipt of” its services.

This is not our vision. Rather than a “transactional” care relationship, in which one part of the “organisation” (the provider) “cares for” another part (the user), we seek a “mutual” one. Our aim is to be not an organisation but a “community” whose members (be they users or providers of service) “care about”, support and enable each other. Our vision is optimistic. We see our purpose as not to provide “care” (a noun that we see as a passive and restrictive) – but to enable our members “to live life well” (a participle that is active and unlimited).

We do this by operating along co-operative lines, so that “Together we can live life well”, allowing members to participate in decision making, problem solving, risk management etc. Leadership is distributed and quality assurance and regulatory compliance is not imposed by hierarchical control but achieved through mutual professional respect and shared clarity of purpose. In more specific terms our code is that:

- Together we are in control, making our own decisions
- Together we “own” problems, identify solutions and make them happen
- Together we contribute and add value
- Together we grow, learn, and develop
- Together we are optimistic about our future

- Together we are a community that lives life well

## **Distributed Responsibility**

A key characteristic of North-West Care Co-Operative (NWCC) is the distribution of leadership and responsibility across our membership. Traditional organisations have hierarchies of managers leading and directing staff through tiers of accountability, using supervision and monitoring arrangements based on vertical control and performance checking.

Whilst North-West Care Co-Operative (NWCC) has a Registered Manager (RM) within our model the RM and the membership together are accountable for making sure that legal requirements are met. The RM acts as a mentor to Personal Assistant Members who together function as a mutually supportive self-managed team.

One impact of this is on the relationship between team Personal Assistant Members and Principal Members (their clients). Personal Assistant Members are responsible for their relationships with Principal Members and the quality and safety of their work. The NWCC Board, the Registered Manager, and the co –operative membership works together to develop values; build a positive, inclusive culture; and set mutual obligations and expectations for how the service works. Members and their wider networks become an active part of this continuous process as soon as they become involved as Personal Assistant, Principal, or Supporting members.

### **Key supporting documents:**

- A. Memorandum & Articles North-West Care Co-Operative: <https://home.mycloud.com/action/share/effcaaf9-3553-4f7c-8ce5-2101594cfa10>
- B. Board Rules (Constitution) for NWCC/Chester: <https://home.mycloud.com/action/share/44965c74-27ac-415f-8cdd-01ef70fec17f>

C. Scheme of delegation North-West Care Co-Operative: <https://home.mycloud.com/action/share/1e9e72cd-1f1f-4e27-a9d7-4a24097cd821>

## **“Care” & Support**

“Care” or (as we prefer to describe them) Support Plans co-produced by each Principal their relevant Personal Assistant and Supporting members set out the basis of the relationship between them and how they will work together. The co-production of the Support Plan is closely aligned with our distributed responsibility model. Support agreements are negotiated and flow from explicit shared values. They describe a person’s circumstances, what support is needed, and how it will be created. They set out the risks involved and how they will be shared and managed.

The Registered Manager works with co-op members to co-produce policies and expectations about how care and support agreement setting is done. This is set out its Statement of Purpose and supporting protocols. Members are involved in individual agreement setting as needed by individual circumstances.

We think that good care and support agreements are not statements of deficits and time and task focused plans created by professional experts. They fully involve and can be led by people, and include a clear focus on people’s strengths, the networks of support around them, and how both can be fostered and nurtured to bolster people’s independence and dignity and the capacity of communities and networks to support themselves.

### **Key supporting documents:**

- A. Co-Produced Support Plan Template: <https://home.mycloud.com/action/share/91aade85-0c20-42d4-a80a-a7bf3d70538f>
- B. Statement of Purpose North-West Care Co-Operative (NWCC): <https://home.mycloud.com/action/share/0b6f66c5-c238-4ea6-a8a1-8242741ac000>

## Safeguarding

North-West Care Co Operative (NWCC) has a legal and professional duty to protect Members from any harm that might be caused by neglect or abuse and provide appropriate safety and protection. We are committed to Safeguarding Principal Members that receive a service from North-West Care Co Operative (NWCC) or any subsidiary or ancillary service and will do so in partnership with the Local Children and Adult Safeguarding Boards.

As well as this commitment our nature as a co-operative community creates additional protective factors by promoting ethical behaviour and providing members with a sense of being valued, listened to, and respected. Listening to the wishes and feelings of Principal Members is embedded in our culture and ensures that the outcomes they seek are at the forefront of service delivery.

Providing 'Safety and protection' means minimising any risk of harm to Members. Should any Member disclose a concern or plain simple curiosity about a possible risk of harm they should raise it with the Registered Manager. **We have deliberately avoided creating a format for 'reporting' potential risks or near misses as we want to encourage an 'open', 'curious' and 'no blame' dialogue that is easy to initiate and co productive in nature.** Together we can then discuss the risk and determine a way forward.

As consequence of any discussion North-West Care Co-Operative has two obligations that Members must be aware of:

1. Regardless of how we decide to proceed, the Registered Manager will make a confidential record of the issue raised. This may be particularly relevant if a further concern is raised independently by another member.
2. Although the discussion will be in complete confidence, if we need to act whilst 'confidentiality' will be maintained as far as possible, it will not impede or prevent action, **and this should be made clear at the time of the initial disclosure.**

As part of their induction, it is explained to our Personal Assistant Members that our duty to act overrides any obligation to confidentiality. Should another Member disclose 'in confidence' anything that is of 'Safeguarding' concern, **Personal Assistant Members should explain that they are obliged to discuss the disclosure with the Registered Manager** and that action may result.

### Key supporting documents:

- A Safeguarding Policy: <https://home.mycloud.com/action/share/15476ccb-fb26-471b-8bc7-1e74975f8946>
- B. Whistleblowing Policy: <https://home.mycloud.com/action/share/f021ca46-176d-4009-948b-beeb59c365d8>

### Risk Assessment

Genuine co-production of care and support means honest, open discussions about the risks involved. These risks can be individual or organisational; relate to Principal or Personal Assistant Members, to the networks around people, to the support team, or to the Co-Operative(s). The Registered Manager will keep the management of all kinds of risk under continuous review, including cultural and values-based issues around sharing, and learning from harm and near misses.

Distributed responsibility is designed to ensure that Members have a clear sense of personal responsibility for their work and manage the risks involved. Accepting and holding this sense of personal responsibility works where there is a genuine supportive learning culture where people feel safe to disclose errors and near misses rather than fear blame and reprisal. Personal Assistant and Principal Members are encouraged to identify and share (with the Registered Manager) potential risks at the earliest possible stage, so that appropriate mitigation can be co-produced. Likewise, they are encouraged to share any 'near misses' so that lessons learned from these experiences can be shared with other members. **We have deliberately avoided creating a format for 'reporting' potential risks or near misses as we want to encourage an 'open', 'curious' and 'no blame' dialogue that is easy to initiate and co productive in nature.** The Registered Manager will record the outcome of this dialogue for future learning.

An open and honest approach to risk management and to learning from harm and near misses is vital. Our commitment to co-production of care and support and distributed responsibility makes sharing and learning a hallmark of our approach.

## Key supporting documents:

- A. NWCC Risk Assessment template: <https://home.mycloud.com/action/share/dd52b2aa-adb1-4f72-824d-45df199280b2>
- B. NWCC Health & Safety Checklist: <https://home.mycloud.com/action/share/3e6d90d9-8f99-4db1-9045-f5df384da252>

## Values Based Recruitment & Qualifications

Our recruitment follows a values-based approach. This is based on our guiding co-operative principles and values about how we operate and the behaviour that we expect from members. We aim to recruit Members with personal values that are aligned with North-West Care Co-Operative expectations and approach.

The law requires paid carers working for registered services to be 'suitably qualified, competent, skilled and experienced' (Regulation 18 of the Regulated Activities Regulations). The law is not explicit about what this means. The care certificate has done much to improve standards in many services and continues to do so. It is referenced by CQC's guidance to providers about complying with the regulations as how they can meet this requirement. But the care certificate is not an explicit legal requirement, and we will often meet the regulation by other means, with specific reference to how Personal Assistant Members will gain the knowledge and skills they need to meet the needs of individual

In summary the law requires that Personal Assistant Members must have the knowledge and skills they need to co-produce and provide the personal care and support each Principal Members requires in the specific ways that they need and prefer. This can include pre-existing knowledge, qualifications and skills about specific conditions and circumstances. Capability can also be acquired 'on the job' through the active involvement and help of User Members, their networks, Supporting Members, and the Registered Manager. We must be confident that our support service as a whole:



- Can work with people to understand their care and support needs and preferences
- Knows when it cannot meet some or all their needs and preferences
- Can match Principal Members with Personal Assistant Members able to co-produce the support they need with them
- Can support Personal Assistant Members who need extra knowledge and skills to acquire them as needed.

**Key supporting documents:**

- A. Selection of Personal Assistants: <https://home.mycloud.com/action/share/8fe1ee7b-5862-44c2-a0ba-5a1694b3ad83>
- B. Appendix A to Selection of Personal Assistants: <https://home.mycloud.com/action/share/0fc9b969-929a-4851-b049-10c0a3d603b8>

**Induction, training, knowledge acquisition and developing capability**

Our vision that “Together we can live life well” takes us beyond “care” and seeks to achieve personal growth and development for all our members where possible. Our approach to risk strives to create a genuine supportive learning culture where people feel safe to disclose errors in order that we can all learn from them, and our commitment to co-production of care and support and distributed responsibility, demonstrates that learning, and developing capability are hallmarks of our co-operative community.

We will support the growth and development of all Members according to their needs and circumstances and enabled by available resources and assets such as the circles of support, mentorship and buddying associated with them. We currently have a wide range of online training provided by ‘Flexibee’, and resources available to Co-Op members in relation to induction, training, and development. ‘Skills for Care’ is the sector workforce development agency and offers applicable resources and support on its website. For more details members can contact [trainingnwcarecoop@gmail.com](mailto:trainingnwcarecoop@gmail.com)

**Key supporting documents:**

- A. Induction Checklist template: <https://home.mycloud.com/action/share/36fd314c-c835-4df8-94e3-1f213e8cd42f>
- B. Personal Development record template: <https://home.mycloud.com/action/share/9c86cedb-7408-4b0f-be45-a64484120f59>

## **Management of Performance, Regulatory Oversight and Supervision**

The Care Quality Commission assumes no model for how NWCC and its community-based care and support teams, structure and manage their relationships with clients, their networks, other stakeholders, and CQC. They accept that different providers will propose, co-produce, test and develop different approaches.

However, whatever the model in use, the role of NWCC as the “Umbrella Body” and the Registered Manager remains the same and we need to define how we will exercise our regulatory and other compliance responsibilities. Arrangements for basics such as ensuring appropriate care and support plans are developed, quality monitoring and improvement, receiving and managing feedback and complaints, managing safety, and safeguarding-related expectations need to be clear.

Likewise, Personal Assistant Members will inevitably need cover from time to time and will also on occasion work with other Personal Assistant Members in a planned way. We need to ensure that we have reliable approaches to managing absence and safe continuity of service.

And how and by whom regulatory tasks such as notifications to CQC, the Duty of Candour, updates to Statements of Purpose and responding to inspection reports will be managed and undertaken also need to be clearly understood.

‘Supervision’ has a specific meaning in academia and in social work that does not reflect how the word is always used in ordinary daily life. In ordinary terms the word is often associated with top down, traditional systems designed to manage performance and hold employees to account. In our model, the performance relationship is more horizontal involving team meetings, ‘buddying’, coaching, mentoring, distributed responsibility, and a shared approach to leadership. The contribution of the Registered Manager in coordinating and enabling this relationship remains critical.

There are no formal legal or employment law definitions for terms like ‘buddying’, ‘coaching’, ‘mentoring’, and ‘distributed responsibility’ and so we will co-produce and define our own Member support arrangements and be clear about what they are, and the roles involved. We will develop and continuously refine our approach to these arrangements.

### **Key supporting documents:**

- A. Coaching Record template: <https://home.mycloud.com/action/share/033b9d23-ff83-4666-8e74-6dfd01e40928>

### **Records**

Keeping meaningful records is an inevitable requirement for a regulated service. The law prescribes certain [required staff records](#) in relation to Employee members.

There is no prescribed model for how records about care and support activity should be kept. The law refers to maintaining a ‘secure, accurate, complete and contemporaneous record in respect of each service user, ***including a record of the care and treatment provided to the service user*** and of decisions taken in relation to the care and treatment provided’.

With responsibility and leadership distributed within our model, access to records and the making of records needs to be equally distributed. Our approach is to avoid wherever possible any kind of paper record which to be kept up to date and secure, requires central storage – which limits accessibility to a distributed membership. Our preference is to record digitally using systems that are always accessible to all members if required, but that can allow access controls on individual records where personal data is involved.

We use two digital recording systems. For storage and accessibility, we use “My Cloud” a Network Access System. This operates like a cloud storage system such as ‘Dropbox’ or ‘Google Drive’ in that it is accessible from anywhere that has Internet access. A free ‘My Cloud’ App is available in the App Store allowing the system to be accessed from a mobile phone.

Access to the system is controlled by the Registered Manager, who grants access to individual Co-Op members. Like ‘Dropbox’ etc, levels of access can be created so that some files can be shared by Co-Op members, whilst each Co-Op member has an individual file to which only they (and the Registered Manager) have access.

**Unlike ‘Dropbox’ etc** who use server capacity all over the world ‘My Cloud’ uses a small ‘server’ located in our Registered Office, allowing us to comply with General Data Protection Regulation (GDPR) which prohibits data storage on servers outside the UK. Storage capacity on ‘My Cloud’ is limited to two Terrabytes. Whilst this has proved more than adequate for operations so far, we have a rigorous archiving and back up regime using portable hard drive(s), that not only regulates our use of available capacity but also forms part of our Business Continuity planning.

We have established some key principles for the use of My Cloud as follows:

- Do not share information on either system outside of that system or group.
- Access, and the uploading, backing up and weeding of records is controlled by the Registered Manager.

**Daily Record of Care** It is a core requirement of regulation that we maintain ‘***a record of the care and treatment provided to the service user***’. With Principal Members living in their own homes across a wide geography a digital means of recording, storing and where appropriate sharing the support that they receive is appropriate and we now use a specific ‘App’ for this purpose. Personal Assistant Members are asked to record the support that they provide for Principal Members by posting on this ‘App’ which gives us a date/time stamped ‘record of care’ by session.

The ‘App’ allows photographs to be posted, and we encourage this as photographs involving the Principal Member, can give a sense of the quality of support and the Principal Member’s satisfaction from the activities that they are involved in. As these ‘records’ can be shared safely with ‘Supporting Members’, eyes other than just those of the Registered Manager are able to judge whether support is ‘Safe, Caring, Responsive, Effective and Well Led, which we believe leads to a safer and quality assured service.

**WhatsApp Chat** We also have a WhatsApp Chat group for all members that can be used for more social purposes

We have established some key principles for the use of What's App as follows:

- Do not share information on either system outside of that system or group.
- Access to What's App is controlled by the Chair of the Chester Co-Operative
- Avoid Personal information on What's App where possible
- Keep posts factual (explaining what you have done) do not post to invite comment.

**Key supporting documents:**

- A. How to use My Cloud: <https://www.youtube.com/watch?v=kp5hoTVOWC0&t=11s>

**Cost, budgets and how support is funded**

In most cases our members fund our services through their Personal Health Budget, Direct Payment Budget, or Personal Contribution, but we can also be commissioned directly by a Local Authority or Clinical Commissioning Group.

We work with each member to operate within their budget. Often this is allocated on a 'time and task' basis with 'support' defined by 'hours per week' rather than by any more quality based outcomes. Based on this and taking account of any other costs required as part of their support we agree with each member the quality outcomes that we can provide within this budget over a full year, and break this down into twelve monthly payments.

Members pay this (same) amount in arrears every month. Payment is by electronic bank transfer after receipt of an invoice. We operate a managed account for each member where we record 'actual' support costs against budget each month. Where 'actual'

costs are below budget, we carry forward the balance to allow members to spend on additional support. 'Actual' costs are rarely above budget, and if they are there is usually a natural compensating adjustment the next month, but if they continue above budget, we agree with members to further compensating adjustments or to make additional contributions.

We retain copies of monthly invoices and ongoing statement of account enabling us to provide full documentation for audit purposes.

## Our contract of Employment

Personal Assistants are employed by North-West Care Co-Operative (NWCC).

**Co-Operative Membership** Personal Assistants are “employee members” of the Co-Operative. All ‘Members’ must abide by the rules of the Co-Operative and as an ‘employee member’ these rules may be in addition to North-West Care Co-Operative terms and conditions of employment. Failure to abide by the rules of the Co-Operative, may result in the Co-Operative suspending their membership.

If a Personal Assistant ceases to be a member of the Co-Operative, North-West Care Co-Operative will review their membership and the impact upon their employment considered. If a Personal Assistant's employment with North-West Care Co-Operative terminates, their Co-Operative membership also terminates.

**Start Date** Each Personal Assistants' start date is outlined on their payslip.

**Probationary Period** There is a probationary period of six months for new Personal Assistant members, during which time they shall receive one weeks' notice. The Registered Manager will confirm the end of the probationary period in writing.

**Employment** Personal Assistants are required to carry-out those duties outlined in their job description, which forms part of their contract of employment. From time to time, Personal Assistants may be required to undertake other duties in accordance with the needs of the business. They may also be expected to participate in the general management and administration of the Co-Operative.

**Place of employment** A Personal Assistants' place of employment shall be at the Principal Member's home or such other places as the Principal Member's Support Plan may require.

**Hours of work** Commencing from the specified start date each Personal Assistants 'contracted' hours of work are based on an average calculated by taking the sum of care (not leave) hours that they have claimed for the whole year since the start date (or 1<sup>st</sup> April that year whichever is the later) and dividing by 52. It may be that on some weeks Personal Assistants will work less than this average and on other weeks more. The calculation will be updated every month and should for example a Personal Assistant work more hours that month a new higher average will be set. North-West Care Co-Operative will guarantee to pay Personal Assistants this average for the next month. Hours exclude meal breaks and are worked in accordance with the Principal Members Support plan requirements. North-West Care Co-Operative will review the hours contracted annually and reserves the right to alter working hours as necessary.

**Recording Hours Worked** Personal Assistants should record the hours that they have worked or taken as leave as they complete them by using our 'Daily Record of Support' App. The record can be edited or updated retrospectively, if necessary, but will be locked and removed after 17<sup>th</sup> of each month in order to process for payroll.

**Overtime** Over-time shall be paid at the ordinary rate of pay per hour for each hour worked over your normal full time working week.

**Bank Holidays** North-West Care Co-Operative recognises the wellbeing value of Bank Holidays as opportunities to spend off work with friends, family or engaged in recreational activity. Where possible Personal Assistant Members are encouraged to enjoy them for these purposes. Where daily support is not essential, Personal Assistants whose support falls on a Bank Holiday are encouraged to arrange with the relevant Principal Member to move their support to another day. For Principal Members who require support daily or where the Principal Member is not willing/able to rearrange support to another day, Personal Assistant Members will be paid at time and a half, and the relevant Principal Member billed accordingly.

For the purposes of this guidance, where the Christmas, Boxing and/or New Year's 'celebration' day(s) fall at the weekend and compensating 'Bank Holidays' are created during the week, both the 'celebration' days and the compensating 'Bank Holidays' will be treated as 'Bank Holidays'. A list of the days that North-West Care Co-operative will treat as Bank Holidays in this way will be published each year.

**Remuneration and benefits** Each Personal Assistant's rate of pay is outlined in their Personal Assistant Contract Summary (see Appendix 1). The rate of pay is reviewed annually. North-West Care Co-Operative is authorised to deduct any sums due to it from your salary or any other sums due to you from the co-operative.

Payment will be made by electronic bank transfer monthly in partial arrears on or about 24<sup>th</sup> of each month. You will receive written notification each pay day of the amount of your gross pay and the nature and amount of all deductions. North-West Care Co-Operative reserves the right to vary the method of payment and will give you a suitable period of notice before doing so.



**Expenses and allowances** Expenses that Members incur on the co-operative's behalf, will be reimbursed provided that the expenditure has been authorised using agreed procedures.

**Annual Leave and payment for Leave** Our leave year runs from April to March. The leave entitlement is 5.6 weeks, with a 'week' being the Personal Assistants 'contracted hours' calculated as described under 'Hours of Work' above. Again, should the average 'contracted' hours change, so will the leave allocation. This is refreshed each month and outlined on each Personal Assistant's payslip. In a Personal Assistant's first year of employment the calculation is pro rata from their Start Date.

Employees can take leave only at times convenient to the co-operative as previously arranged by notice. Leave not taken by 31<sup>st</sup> March cannot be carried forward to the following leave year without the Registered Manager's written permission. Payment will be made for up to one week's leave not taken. Where holiday is carried forward it must be used in the following year.

Leave accrues daily, and if a Personal Assistant leaves the employment of North-West Care Co-Operative with some leave outstanding, they will be paid on their last day of employment the balance of their accrued pro rata but not taken. Any leave taken that exceeds their pro rata entitlement will be deducted from their final salary payment.

**Pensions** The designated pension scheme is NEST. North-West Care Co-Operative will contribute up to 3% of your salary. Personal Assistants may contribute up to 5% of their salary. They may be auto enrolled into the pension scheme at any time. North-West Care Co-Operative reserves the right to withdraw, amend or replace pension provision at any time.

**Absence due to sickness or injury** If a Personal Assistant is unable to attend work due to sickness or injury, they must advise the Registered Manager of the reason for non-attendance by 9.30 am on the first working day of absence.

For periods of absence up to seven days, Personal Assistants must complete and sign a form of self-certification (to be supplied by the Registered Manager) on their return to work. Sickness or injury absence exceeding seven days must be covered by a doctor's certificate/fit note. Further doctor's certificates/fit notes must be received by North-West Care Co-Operative, covering the complete period of absence. Failure to comply with this absence procedure may result in the withdrawal of sick pay and/or disciplinary action.

**Sick Pay** If A Personal Assistant is absent from work for four or more days by reason of sickness or injury, they are entitled to statutory sick pay. Payment thereafter will be at the discretion of North-West Care Co-Operative. Such pay entitlement does not guarantee the continuation of your employment during this period.

Sick pay is subject to the usual deductions for PAYE, national insurance, pension contributions, etc.

**Maternity, Paternity, Adoption & Parental Leave Provisions** North-West Care Co-Operative's maternity, paternity, adoption, and parental leave provisions are outlined in *(appendix to follow)*.

**Disciplinary & Grievance Procedure** The co-operative's disciplinary and grievance procedures are outlined in *(appendix to follow)*.

**Confidentiality** Personal Assistants must not reveal to any unauthorised person or use for their own advantage any information of a confidential nature relating to the business, finances, and affairs of North-West Care Co-Operative or their parent co-operative.

**Health & Safety** North-West Care Co-Operative recognises its obligations under the Health and Safety Legislation and Personal Assistants are expected to follow that policy. This information is provided by means of a statement displayed on My Cloud.

**Trade Union** North-West Care Co-Operative does not recognise any specific trade union as the trade union representing the interests of its Personal Assistants.

**Other Employment** If a Personal Assistant wishes to undertake other paid work whilst an employee of North-West Care Co-Operative, they must seek approval first from the Registered Manager.

**Notice periods** Personal Assistants wishing to leave employment must give 2 weeks' notice in writing to the Registered Manager.

Once the probationary period is completed, save in cases of gross misconduct, this contract may be terminated at any time according to the following periods of notice:

- 1. One week for employees with continuous service from one week to two years.
- 2. Thereafter, one additional week’s notice for each year of continuous employment (up to a maximum of 12 weeks’ notice).

North-West Care Co-Operative reserves the option to pay Personal Assistants a payment equal to the remuneration due for the relevant period of notice rather than requiring them to work their notice period but is not obliged to do so.

North-West Care Co-Operative reserves the right to require Personal Assistants not to attend the workplace during their notice period. The contract of employment will remain in force during this period and Personal Assistants are not permitted to take up employment elsewhere during this period.

**Appendices**

1	<b>Bank Holiday Arrangements:</b> <a href="https://home.mycloud.com/action/share/e35362fc-1701-4b4a-ac66-564c293c8dcd">https://home.mycloud.com/action/share/e35362fc-1701-4b4a-ac66-564c293c8dcd</a>
2	<b>Consent to take &amp; share Photographs:</b> <a href="https://home.mycloud.com/action/share/951cf50b-87fa-432c-9555-90238569fe5a">https://home.mycloud.com/action/share/951cf50b-87fa-432c-9555-90238569fe5a</a>
3	<b>Complaints Policy:</b> <a href="https://home.mycloud.com/action/share/9c75b2ae-be66-4a08-9fb6-544db2fc718c">https://home.mycloud.com/action/share/9c75b2ae-be66-4a08-9fb6-544db2fc718c</a>
4	<b>Whistleblowing Policy:</b> <a href="https://home.mycloud.com/action/share/f021ca46-176d-4009-948b-beeb59c365d8">https://home.mycloud.com/action/share/f021ca46-176d-4009-948b-beeb59c365d8</a>
5	<b>Risk Assessment:</b> <a href="https://home.mycloud.com/action/share/58de887d-771e-439a-ab82-bb38870ce314">https://home.mycloud.com/action/share/58de887d-771e-439a-ab82-bb38870ce314</a>