

WEST LIMERICK INDEPENDENT LIVING CLG

Policy on Policies

Policy Reference	WLILP1
Category	Governance — Policy Framework
Version	2.0 (updated to formalise current practice —)
Status	APPROVED — by the Board of Directors on 9 October 2026
Supersedes	WLILP1 - Policy on Policies Policy (issued Nov 2016, reviewed Apr 2025)
Policy Owner	Board of Directors, West Limerick Independent Living CLG
Applies To	All employees and Board members involved in writing, reviewing, approving or maintaining WLIL policies
Related Policies	All WLIL policies are governed by this document
Review Cycle	Annually, or sooner if WLIL's governance structure or policy practice changes materially

1. Scope

This policy addresses the process for developing, issuing, formatting, numbering and maintaining all West Limerick Independent Living CLG ("WLIL") policies, and applies to all employees and Board members.

2. Policy Statement

The purpose of this policy is to ensure WLIL staff and Board members have ready access to well-developed, current and understandable policies. Policies that are easy to find, read, and trust as up to date will:

- support WLIL's mission
- achieve accountability by identifying the role responsible for each policy
- provide staff and the Board with clear, concise guidance
- document how WLIL conducts its business
- give confidence that a policy's legal and factual content is current, not just its formatting

WLIL policies will be:

- presented in the common format set out in Section 6
- formally approved by the Board, with approval status always visible on the face of the document
- maintained centrally in the Master Policy Register (Section 9) and accessible to all interested parties
- linked electronically, or cross-referenced, to related policies and procedures, rather than duplicating their content
- kept current within the framework of an organised system of change control, version numbering, and periodic legislative review

Policies are distinguished from procedures per the definitions in Section 4. Internal, more restrictive procedures for individual roles or services may exist, but must not conflict with organisation-wide policy.

3. Why This Matters

A review of WLIL's policy set found recurring issues that this update is designed to prevent from recurring: policies naming individual staff members, which go stale the moment that person changes role; duplicate or near-duplicate policies drifting apart over time because neither cross-referenced the other; citations to legislation that had been repealed, superseded, or that belonged to a different jurisdiction entirely; and no consistent way to tell, from a document alone, whether it was an approved policy or an unapproved. The practices in this policy exist to close those specific gaps, not as generic best practice for its own sake.

4. Definitions

Policy: a statement of management philosophy and direction, providing guidance to WLIL staff and Board members in the conduct of WLIL's affairs. A policy is a governing principle that mandates or constrains actions, has organisation-wide application, changes infrequently, helps ensure compliance with applicable law, reduces institutional risk, and is approved by the Board

Procedure: a guideline or series of interrelated steps to help implement a policy. A procedure should identify and link to its governing policy, be written in an easy-to-follow, numbered or bulleted format, be reviewed and updated to stay consistent with the most recent version of its policy, and generally does not require formal Board approval

Policy Initiator: any Board member or employee who identifies a policy issue and develops a policy proposal

Policy Owner: the role accountable for a given policy's content and currency. This is a role, not a named individual — see Section 5

Policy Administrator: the role responsible for maintaining the Master Policy Register, circulating approved policies, and tracking review dates. This is a role, not a named individual

General Manager / Manager: In every WLIL policy, procedure, handbook, contract and form, “Manager” and “General Manager” mean the same role: the General Manager of WLIL. The two terms are interchangeable and may appear in different documents. They are not the same as the Finance Manager, a Service Coordinator or a line manager, which are separate roles.

Stakeholder: WLIL Board members and employees affected by the policy being developed

5. Roles Are Named, Not People

Policies must refer to roles (e.g. "the General Manager," "the Data Protection Officer," "the Service Coordinator") and never to a named individual. A policy that names a person needs reissuing every time that person changes job or leaves, which in practice means the named contact information silently goes out of date long before anyone notices.

Where a policy needs to give a specific point of contact (an email address, phone number, or external body's details), this should also be expressed by role wherever possible. WLIL should maintain a separate, easily updated internal list mapping current role-holders to their contact details, rather than embedding this in policy text. External contacts (regulators, HSE contacts, professional bodies) should still be periodically re-verified, as these also change over time independently of WLIL's own staffing.

6. Policy Format

Company policies will be written and maintained using the following standard structure:

6.1 Header (Metadata Table)

- Policy Reference — the policy number (see Section 8 on numbering)
- Category — the policy's area, e.g. Governance, Clinical & Care Practice, Operational Policies
- Version — see Section 7
- Status — Date formally approved – 9TH October 2026
- Supersedes — the policy or policies this version replaces, including their version and date where known
- Document Note — a short explanation of what materially changed in this version and why, so the change history is visible without needing to compare full documents line by line
- Policy Owner — the responsible role, not a named individual
- Applies To — who and what the policy covers
- Related Policies — cross-references to other policies that share subject matter, so a reader is directed to the right document rather than encountering duplicated or conflicting content
- Review Cycle — how often the policy is reviewed; annually unless the subject matter changes faster (for example, procurement thresholds are revised every two years by the OGP, and should be reviewed on that cycle rather than only annually)

6.2 Body

- Scope — who and what is governed by the policy
- Legislative and Regulatory Framework — see Section 10
- Policy Statement — the purpose, philosophy, and position the policy establishes
- Policy — the substantive content: duties assigned to responsible roles, procedures where relevant, and the compliance/non-compliance consequences
- Review — the review cycle and trigger conditions for an earlier review
- Approval — a signature block recording the Chairperson's approval on behalf of the Board, and the date

Note: for WLIL policies that predate this format, the format above is not retrospectively mandatory, but should be adopted whenever a policy is next revised.

7. Version Numbering and Status

- A new policy starts at Version 1.0
- A substantive revision (a change to legal content, procedure, or scope) increments the whole number: 1.0 → 2.0
- A minor correction (a factual update, contact detail, or small clarification that does not change the policy's substance) increments the decimal: 2.0 → 2.1
- A policy that has not yet been approved by the Board is marked in its Status field, however complete or polished it looks. A document is not "the policy" until the Board has approved it — a well-formatted is still a

- Once approved, the Status field is updated to record the approval date, and the version number at that point becomes the current approved version

8. Policy Numbering

- Policies are numbered sequentially as WLILP1, WLILP2, WLILP3, and so on, as they are created
- Where two or more policies are merged into one (for example, because they covered overlapping ground and had begun to drift apart), the Board should formally decide which number survives and record the other as retired in the Master Policy Register, rather than leaving both numbers in circulation for the same content
- Where one policy is more usefully split into a set of closely related documents sharing one governing framework (for example, a master Data Protection Policy alongside its Breach Response, Subject Access Request, and Retention procedures), the set may be numbered with a shared root number and a letter suffix — WLILP7A, WLILP7B, WLILP7C, WLILP7D — so that the relationship between the documents is visible from the number itself
- A retired number should not be reused for an unrelated policy, to avoid confusing historical references to the old content

9. The Master Policy Register

The Master Policy Register is WLIL's single source of truth for what policies exist, their current status, and where to find them. It is maintained by the Policy Administrator and reviewed by the Board at least annually. For each policy, the Register records:

Field	Purpose
Policy number and title	Unique identification, including any letter-suffixed set
Category	For grouping and navigation
Current version and status	Whether it is an approved policy or a pending
Policy Owner (role)	Who is accountable, without naming an individual
Last legislative/factual currency check	The date its legal citations and factual claims were last verified (see Section 10) — distinct from the date the document was last edited
Next review due	So reviews happen on schedule rather than only when someone notices a policy is old
Supersedes / superseded by	To keep the history of merges, splits and retirements traceable
File location	Where the current, approved version is actually filed, so staff are never working from a stray copy

10. Legislative and Factual Currency Check

Before a policy is submitted to the Board for approval, the Policy Owner must confirm that its legal citations and factual claims are current, not merely that its formatting is complete. This check should specifically consider:

- whether cited legislation has been repealed, amended, or superseded since the policy was last checked

- whether any cited legislation has been enacted but not yet commenced — this should be stated explicitly, since "enacted" and "in force" are not the same thing, and a policy should not describe a duty as binding before it actually is
- whether the citation is actually Irish law — content drawn from templates, examples, or AI-assisted ing has, in practice, sometimes carried over legislation from other jurisdictions (for example, UK or US law) without this being obvious from a read-through
- whether a named contact, role, or external body's details (for example a regulator's address or phone number) are still current
- whether the policy's content has since been duplicated, or made redundant, by another WLIL policy — and if so, whether cross-referencing rather than continued duplication is now the better approach

This check does not require a legal qualification to perform for most policies, but does require actually verifying claims rather than assuming a policy is correct because it looks professionally formatted or has survived previous reviews unchanged. Where genuine legal uncertainty exists, or the consequences of getting it wrong are significant, the Policy Owner should seek external legal advice before the policy goes to the Board.

11. Policy Development Process

A Policy Initiator identifies a policy issue and develops a proposal, which is submitted to the General Manager for review and endorsement. If endorsed, a is created following the format in Section 6. The Policy Owner reviews the 's likely impact on staff, including its legal implications, and performs the currency check in Section 10. After review, the policy is formally submitted to the Board for approval, marked until that approval is given. Once approved, the Policy Administrator forwards an electronic copy to all staff, updates the Master Policy Register, and files the current version in the location described in Section 12. The Policy Administrator notifies the Board when policies are scheduled for review. As set out in each individual policy, the responsible role monitors compliance and facilitates remedies for non-compliance.

12. Location of Policies

WLIL maintains a policies folder in the Newcastle West office, and a soft copy on WLIL's shared drive. The Master Policy Register (Section 9) should always be treated as the definitive record of what the current, approved version of any policy is and where to find it — not any individual saved copy, which may be outdated.

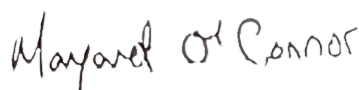
13. Review of This Policy

This policy will be reviewed by the Board annually, or sooner if WLIL's governance structure, numbering conventions, or policy-making practice changes materially.

Approval

Approved by the Board of West Limerick Independent Living CLG on 9 October 2026.

Signed on behalf of the Board, on its instruction, by the General Manager:



Margaret O'Brien O'Connor, General Manager

Date signed:

09-10-2026