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## Disciplinary Procedure

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### 1. INTRODUCTION

This Procedure applies where it is alleged that a current Member of the Healing Trust (a Member) has breached the Trust's Code of Conduct (the Code). In relation to staff, The Healing Trust follows the provisions of The ACAS Code of Practice on disciplinary and grievance procedures.

### 2. DEFINITIONS

In this document:

**Appeal** means an appeal from the decision of a Disciplinary Panel after a Disciplinary Panel meeting;

**Appellant** means the Member who is appealing from a Disciplinary Panel meeting;

**Code** means the Trust's Code of Conduct, a copy of which can be found on the Trust's website;

**Companion** means someone assisting the Member at a Panel meeting.

**Complainant** means the person making a complaint against a Member

**Complaints Procedures** means the Trust's Internal and External Complaints Procedures;

**Complaint Panel** means a Panel constituted in accordance with section 8 of the Internal or External Complaints Procedure;

**Complaint Appeal Panel** means a Complaint Appeal constituted in accordance with section 8 of the Internal or External Complaints Procedure. ;

**Complaints Register** means the register of any complaint made against a Member, detailing the names of the Complainant and the Member, a summary of the nature of the complaint, the date the complaint was made, and the date and nature of the resolution of that complaint (i.e. Withdrawn, upheld or dismissed).

**Decision** means the decision of a Panel after a Panel meeting;

**Disciplinary Appeal Panel** means a panel constituted in accordance with section 15.1;

**Disciplinary Panel** means a Panel constituted in accordance with section 9.2;

**Disciplinary Procedure** means the Trust's Disciplinary Procedure set out in this document;

**Elected Officer** means the elected National Chair, Vice- Chair, Secretary and Treasurer and the Chair, Vice-Chair, Secretary and Treasurer of any Region or Healing Centre;

**Employee** means any person employed by the Trust;

**External Complaints Procedure** means The Trust's Procedure for dealing for dealing with a complaint by a third party against a trustee, Member or employee of the Healing Trust. It can be found on the public section of the Trust's website;

**Healing Centre** means a Trust Healing Centre established in accordance with Section 3 of the Healing Trust Standing Orders;

**Internal Complaints Procedure** means the Trust's Procedure for dealing with a complaint which has arisen within the Trust, where both parties are Members or employees. It also provides a framework for resolving grievances within the Trust;

**Interim Order** means an Order in accordance with section 12 of this Procedure a Disciplinary Panel or Disciplinary Appeal Panel;

**Member** means, for the purposes of this Procedure, any student, healer or community Member as defined in Article 4 of the Articles of Association and paragraphs 12 to 19 of the Code of Conduct, or any trustee who has been made an Honorary Member in accordance with Order 4.4 of the Standing Orders; or any Employee, who is the subject of any disciplinary action under this Procedure;

**Office Manager** is currently Lis Blunden [lis@thehealingtrust.org.uk](mailto:lis@thehealingtrust.org.uk);

**Panel** means a Disciplinary Panel or a Disciplinary Appeal Panel, as the context requires;

**Panel Meeting** means a meeting of a Disciplinary Panel or a Disciplinary Appeal Panel, as the context requires;

**Party** means one of the Parties at a meeting of a Disciplinary Panel or a Disciplinary Appeal Panel;

**Policies** means the Trust's policies which can be found on the public section of the Trust's website;

**Presenting Officer** means a person appointed by the Standards Officer to put the Trust's case at a Disciplinary Panel or a Disciplinary Appeal Panel meeting in accordance with section 9.6;

**Procedures** means the Trust's policies which can be found on the public section of the Trust's website;

**Standards Officer** means the Chair of The Healing Trust Governance and Ethics Committee, currently Penny Hamilton; [penny@thehealingtrust.org.uk](mailto:penny@thehealingtrust.org.uk)

**The Parties** means the Trust and the Member at a meeting of a Disciplinary Panel or a disciplinary Appeal Panel; Disciplinary or Appeal Panel.

**Trust** means The Healing Trust

**Trust's solicitors** means the solicitors appointed to advise and represent the Trust;

**Trustee** means a trustee appointed in accordance with Section 4 of the Healing Trust Standing Orders;

**Trustees** means the Board of Trustees of the Healing Trust;

**UK Healers** is the Lead Body for Spiritual Healer practitioners in the United Kingdom  
<https://ukhealers.co.uk>

### **3. GUIDING PRINCIPLES FOR THE DISCIPLINARY Procedure**

The guiding principles are:

- 3.1 Actual and perceived fairness to the Member concerned.
- 3.2 Ensuring adherence to the Trust's Code, policies and Procedures.
- 3.3 Maintaining the reputation of the Trust as a well-governed organisation capable of proper self-regulation.
- 3.4 Adherence to the principles of natural justice that both sides should always be heard and that no person should be a judge in their own cause.
- 3.5 Protection, as far as possible, of the Member's feelings.

### **4. THE ROLE OF THE STANDARDS OFFICER**

- 4.1 The Standards Officer will be responsible for initiating and overseeing this Procedure and the Trust will provide any necessary administrative assistance.
- 4.2 The Standards Officer will take no part in the decision-making process but will be available to assist the Parties and the Panel acting only in an advisory capacity.
- 4.3 The Standards Officer may delegate any part of the process as appropriate.

### **5. CIRCUMSTANCES IN WHICH THE DISCIPLINARY PROCEDURE WILL BE TRIGGERED**

- 5.1 When, on receipt of a complaint, the Standards Officer, a Complaint Panel or a Complaint Appeal Panel decides that the complaint needs to be dealt with under this Procedure rather than the Complaints Procedure.
- 5.2 When a breach of the Code unrelated to a complaint has been identified and reported to the Standards Officer.
- 5.3 Where, having heard the evidence and made their findings of fact, a Complaint Panel or Complaint Appeal Panel has referred a complaint to this Procedure in accordance with section 8.3 of the Internal or External Complaints Procedure.

- 5.4 Where a Tutor Complaint Panel, having heard the evidence and made their findings of fact, has referred a complaint to this Procedure under section 8.3 of the Internal Complaints Procedure.
- 5.5 Where the Trustees have made a recommendation under section 11.4 of the Internal Complaints Procedure or section 12.4 of the External Complaints Procedure that the trustee be removed from office in accordance with article 28.9 of the Trust's Articles of Association.

## **6. ACTION BY THE STANDARDS OFFICER ON BEING NOTIFIED OF A BREACH**

### **6.1 Further investigations**

The Standards Officer will undertake any further investigations or other steps needed to determine the extent of the breach of the Code. These will include checking the Complaints Register and the Member's file.

### **6.2 Informing the Member**

The Standards Officer will inform the Member by letter or email, of the notification of the breach, and that the Trust has a duty to investigate any such notification, but that the Member will be kept fully up to date at all times. The email will outline the nature of the alleged breach; the specific conditions of the Code alleged to have been breached and ask for the Member's response within 21 days. The Member will also be informed that all correspondence and any other documents provided by the Complainant or the Member will be shared with the other party unless the Complainant or Member makes a request for something to remain confidential which the Standards Officer decides is reasonable in the circumstances.

### **6.3 Considering which form of resolution would be suitable**

The Standards Officer will consider whether the alleged breach can be resolved informally in accordance with section 7 below. If informal resolution is not appropriate, or has been unsuccessful, the Standards Officer will start the formal Disciplinary Procedure set out in sections 8 to 19.

### **6.4 Criminal offence**

If the actions of the Member could constitute a criminal offence, the Standards Officer must:

6.4.1 Remind the Complainant of their right to inform the police

6.4.2 Inform the Chair of Trustees.

6.4.3 Inform and take advice from the Trust's solicitors, in particular with regard to suspension.

6.4.4 Inform UK Healers.

6.4.5 Take advice from the police and the Trust's solicitors as to whether the Disciplinary Procedure should be halted or allowed to continue.

## **7. INFORMAL RESOLUTION**

### **7.1 When informal resolution is possible**

Informal resolution is intended to apply to minor breaches of the Code which would not warrant a formal hearing, and where there is every reason to believe that an informal process would meet the expectations of anyone making a complaint against a Member.

### **7.2 Appointing the appropriate person**

If the Standards Officer decides that informal discussion is appropriate, they will contact the person they believe to be most suitable to speak to the Member concerned, such as the Chair of the relevant Region or Healing Centre and ask them to arrange a meeting with the Member as soon as possible.

### **7.3 Notes of the Informal discussion**

The person conducting the informal discussion should make a note of what was discussed, and any decisions taken, and send that note to the Standards Officer.

### **7.4 Outcome of the informal discussion**

Informal resolution can result in one of the following outcomes:

7.4.1 No further action.

7.4.2 Requiring the Member to undergo further training or assessment.

7.4.3 Requiring the Member to retract any false or offending statement.

7.4.4 A verbal warning and/or advice given by the person who has spoken to the Member.

7.4.5 A written warning by the Chair of the Trustees.

### **7.5 Action by the Standards Officer**

On receipt of the notes of the informal discussion the Standards Officer will:

7.5.1 Inform the Chair of the Trustees and, if requested by the person conducting the informal discussion, arrange for a written warning to be sent to the Member.

7.5.2 Send the notes of the discussion, the details of any verbal warning and the copy of any written warning to Central Office so that a record can be kept on the Member's file.

7.5.3 Whatever the outcome, send details of the complaint to Office Manager to record in the Complaints Register

## **FORMAL DISCIPLINARY PROCEDURE**

### **7.6 Introduction**

The Formal Disciplinary Procedure will be instigated when the breach of the Code of Conduct is of a serious nature or, for whatever other reason, the Standards Officer considers informal resolution to be inappropriate. The process to be adopted will depend on whether there has been a previous hearing under one of the Complaints Procedures resulting in findings of fact being made and, specifically, that the Member has breached the Code. Sections 8.2, 9 and 10 below apply where there has been no such hearing and the task of the Disciplinary Panel will be to consider the evidence, make findings of fact and determine whether the Member has breached the Code.

### **7.7 Action by the Standards Officer in cases falling within sections 5(1), and 5(2) above;**

These cases will have come to the Standards Officer without there having been any previous consideration and the Standards Officer will:

- 7.7.1 Inform the Chair of Trustees and keep them informed throughout.
- 7.7.2 Inform the Trust's Insurers if the issue could give rise to a claim.
- 7.7.3 Refer to the Trust's solicitors for advice if necessary.
- 7.7.4 Consider whether the Member should be suspended and, if this is considered appropriate, advise the Chair of Trustees.
- 7.7.5 Undertake, or arrange to be undertaken, such investigations as are necessary to enable a fully researched case to be put to a Disciplinary Panel. Any interview conducted must be carefully recorded and witnessed as they may be used at a formal hearing. Anyone, other than the Standards Officer, conducting an interview should be properly briefed and the Trust's solicitors may be consulted about obtaining evidence. Under data protection law (UK GDPR), it is necessary to obtain consent from the person who provided information before sharing it. This might mean that some information might have to be anonymised before sharing it.

## **8 PREPARATION FOR A DISCIPLINARY PANEL HEARING**

### **9.1 Preparing the Trust's Evidence**

Once the Standards Officer has received the responses to any investigations under Para 8.2.5, the Standards Officer will compile a bundle of statements and evidence and will send this to the Member, inviting the Member to respond within 21 days with any further points they wish to make to the Panel or documents or other evidence which they wish the Panel to consider.

## 9.2 **Convening a Disciplinary Panel**

The Standards Officer will then convene a Disciplinary Hearing Panel consisting of three Members of the Trust. The composition of the Panel will be within the discretion of the Standards Officer, depending on the nature and severity of the case, but should include at least two Trustees.

## 9.3 **Fixing a Date for the Panel**

The Standards Officer will arrange a meeting of the Disciplinary Panel, to take place as soon as is possible. Unless the Member objects, the meeting will be held via Zoom or similar technology and will be recorded. If it is held in person, the meeting must be at a place accessible to all involved and in surroundings which are conducive to a cordial and supportive atmosphere. The Standards Officer must give fair notice to the parties of the date and time of the meeting, which must be convenient for all involved.

## 9.4 **Right to Have a Companion**

The Standards Officer must inform the Member of their right to be accompanied by a person of their choice (a “Companion”) to assist them at the Disciplinary Panel meeting. A Companion may not answer questions put to the Member or prevent anyone else at the meeting from speaking.

## 9.5 **Right to Be Represented**

The Member may represent themselves or have a representative who can be legally qualified.

## 9.6 **Representation of the Trust**

The Standards Officer will appoint a Presenting Officer to represent the Trust.

## 9.7 **Evidence for the hearing of the Disciplinary Panel**

9.7.1 The Trust and the Member (the Parties) should ensure that they have enough copies of all the documents on which they wish to rely for the other Party and the Panel.

9.7.2 The documents for the hearing will normally be the Trust’s evidence which has already been sent to the Member by the Standards Officer, and the Member’s response and any documents in support of that response.

9.7.3 It is only in exceptional cases that the Disciplinary Panel will allow the Parties to rely on any new documents which have not already been seen by the Panel and the Parties.

9.7.4 The Parties should ensure that any witnesses they wish to call in support of their case are able to attend the meeting. If a witness is unable to attend, a written statement may be used but only if the Disciplinary Panel and the party’s consent. The Parties should be aware that a written statement can be less persuasive than a live witness.

## 9.8 Enquiries

If it is considered helpful to the Panel's decision, the Panel, or the Standards Officer, as appropriate, may make any enquiries or consider any documents which may be necessary to conduct a proper hearing

# 10 THE MEETING

## 10.1 Confidentiality

All Panel meetings will be held in private and, subject to the requirements of this Procedure and the Trust's Code of Conduct, will be confidential to the Panel and the parties.

## 10.2 Attendance

The Member should make every effort to attend the Panel meeting on the date set. If they do not attend, and there is no reasonable excuse for their absence, the Panel meeting can be held and concluded in their absence, and the Panel will take into account anything the Member has already told the Trust and any documents or other evidence that the Member had already supplied.

## 10.3 Procedure at the Panel meeting

The Panel Meeting is not a court of law, and it is up to the Panel to run it in a way which leads to a fair and impartial decision. This means that the Member and the Trust must each have the opportunity to:

10.3.1 tell the Panel all the relevant facts

10.3.2 show the Panel any documents on which they wish to rely

10.3.3 call any witnesses in support of their case and allow them to be questioned by the Panel and the other Party

## 10.4 Order of Proceedings

It is helpful to allow the Trust to speak first and make their case. The Member will then be able to respond once they have heard all the details of the alleged breach. After the Member has put their case and evidence to the Panel the Trust will have the opportunity to answer any points made by the Member or the Panel. If the Trust makes any new points, the Member will be allowed to respond to these. The Trust will then have the opportunity to summarise their case, followed by the Member, who will always have the last word.

## 10.5 Intervention by the Panel

This framework is not intended to be rigid and there may be times during the Panel Meeting when the Panel wishes to intervene and ask questions or discuss issues with the Trust and/or the Member.

## 10.6 Keeping a Record

The Panel must keep a contemporaneous note of what has been said which will form part of the written record of the meeting.

## **10.7 Further Enquiries**

The Panel may wish to make further enquiries before reaching a decision. If so, the result of those enquiries must be sent to the parties for comment before a decision is made. Under data protection law (UK GDPR), the Panel should obtain the consent of the person who provided information before sharing it. This might mean that some information might have to be anonymised before sharing it.

# **11 PROCEDURE WHEN THERE HAS BEEN A FINDING OF FACT BY A COMPLAINT PANEL**

## **11.1 Introduction**

In cases brought under sections 5.3 or 5.4, there will already have been a full hearing on the facts and a determination by a Complaints Panel. The Panel, having heard all the evidence, will have considered the matter serious enough to invoke the Disciplinary Procedure against the Member and will have referred it to the Standards Officer to put it into effect.

## **11.2 Convening a Disciplinary Panel**

The Standards Officer will appoint a Panel, as in Section 9.2, whose Members will not have been involved in any previous hearings. To ensure that the Disciplinary Panel are fully aware of, and understand, the findings of the Complaints Panel, the Standards Officer will also appoint an observer who was a Member of the Complaints Panel. The observer will take no part in the decision-making process.

## **11.3 Preparation for the Panel hearing**

The provisions of sections 9.3 to 9.7 and 9.9 apply.

## **11.4 Evidence for the hearing**

As there will already have been a full hearing of the evidence and findings of fact, there will not be a rehearing of the facts. The Panel will have before it any documents submitted by either party and the recording and transcript of the Zoom (or equivalent) hearing and the decision of the Panel. Further evidence will only be permitted in exceptional circumstances.

## **11.5 The Panel Hearing**

The provisions of section 10 will apply, with the exception of any references to witness or documentary evidence in Section 10.3, which are not relevant because the Panel will rely on the findings of fact by the appropriate Complaints Panel.

# **12 INTERIM ORDERS**

## **12.1 Interim Order**

An Interim Order serves to temporarily suspend or restrict the Member's practice while their case is being investigated. An order may:

12.1.1.1 Impose interim conditions on the Member's practice

12.1.2 Suspend the Member from practice on an interim basis

12.1.3 Report the Member to other organisations

## 12.2 **Power to make an Interim Order**

At any time in the process, the Disciplinary Panel has the power to recommend to the Chair of the Trustees that an interim order be made if they are satisfied that it is necessary to protect the public or otherwise in the public interest. Before making such a recommendation, the Disciplinary Panel will invite the Member to make written representations within five working days.

## 12.3 **Office Holders**

It may be appropriate for an Office Holder to be suspended from their duties during this Procedure. Elected Office Holders or Committee Members of the Trust are barred from holding office while their Membership is suspended for any reason. The appropriate Region or Centre must be informed immediately and should appoint another Office Holder to perform the duties of the suspended Office Holder until such time as the situation is resolved.

# 13. **THE DECISION**

## 13.1 **Role of the Disciplinary Panel**

In cases falling within sections 5.1 and 5.2, the Disciplinary Panel's role is to determine, on all the evidence, whether the Member has breached the Code. In all cases, the Panel must determine which regulatory actions, if any, must be taken.

## 13.2 **The Outcome**

The Disciplinary Panel may determine:

13.1.1 That there is no case for the Member to answer

13.1.2 Whether the allegations amount to misconduct

13.1.3 Whether the Member's fitness to practise is currently impaired as a result of the misconduct

13.1.4 If so, which, if any, order under section 13.3 is appropriate and proportionate in the circumstances

## 13.3 **Powers of the Disciplinary Panel**

The Disciplinary Panel has the power to:

13.3.1 Take no further action

13.3.2 Require the Member to complete further training or assessment.

13.3.3 Issue an admonishment

13.3.4 Issue a written warning or advice to the Member

13.3.5 Refer the matter to the Trustees with a recommendation that the Member be expelled from the Trust

#### **13.4 Mitigation**

If the Panel is considering expulsion determination within section 13.3.5, they will, before making any decision as to any sanction, inform the parties and invite the Member to put forward within 14 days any mitigating circumstances the Member wishes to be taken into account. The Panel will then decide, in the light of any such mitigation, whether any other sanction within section 13.3 is more suitable.

#### **13.5 Notification of the Outcome of the Meeting**

At the end of any Disciplinary Panel hearing all papers will be forwarded to the Standards Officer who will notify the Parties of the outcome.

#### **13.6 Recording the Decision**

The outcome will be entered into the Complaints Register and noted on the Member's file for a period of 10 years.

#### **13.7 Expulsion of the Member**

If the Trustees decide that the Member should be expelled, the ex-Member will be instructed to remove any mention of their association with the Trust or the National Federation of Spiritual Healers (the NFSH) from all publicly accessible materials, including websites and social media platforms, within one month. Should the individual fail to comply within this allotted period, the Trust will report the matter to the relevant advertising and trading standards organisations and to any other public bodies deemed necessary for the protection of the public or otherwise in the public interest.

#### **13.8 Informing UK Healers**

The Standards Officer will inform UK Healers of the outcome of the Disciplinary Panel and any sanctions imposed.

### **14 APPEAL AGAINST A DECISION OF A DISCIPLINARY PANEL**

#### **14.1 The right to appeal**

The Member has the right to appeal against a final decision made by the Disciplinary Panel at a Formal Hearing.

#### **14.2 Notifying an appeal**

The Member must send the Standards Officer a written notice of appeal within 28 days of the original decision. The notice of appeal must outline the reasons why they are appealing and, in particular:

14.2.1 Specify the decision being appealed and set out the grounds of their appeal (see below).

14.1.2 Set out the Member's desired outcome.

## 14.2 **Grounds for appeal**

An appeal is not a rehearing of the evidence, and an appeal can only be made on one or more of the following three grounds:

14.3.1 The correct Procedure was not followed.

14.3.3 Crucial evidence has been disregarded or not given the necessary weight.

14.3.3 The decision of the Disciplinary Panel was perverse and outside of the range of reasonable responses available to them in all the circumstances.

## 15 **DEALING WITH AN APPEAL**

### 15.4 **Appointing an Appeal Panel**

On receiving the appeal, the Standards Officer will appoint an Appeal Panel of three Members, consisting of the Chair of Trustees, one other Healer Trustee who was not the Disciplinary Panel, and one other person independent of The Trust. It will be entirely within the discretion of the SO, whether that person shall be legally qualified or have any other field of competence. The Panel will appoint its own Chair.

### 15.3 **Responding to the Appeal**

Within five working days the Standards Officer will send a copy of the appeal to the Presenting Officer and ask for a response within 21 days. The Standards Officer will send a copy of that response to the Member within ten working days who, if they wish, may then reply to that response within 21 days.

### 15.4 **Further information about the Appeal**

If necessary, the Standards Officer can ask the Member, or the Trust, for further information about their appeal or response. The Standards Officer will ensure that each party to the appeal has seen any information provided by the other party.

### 15.5 **Setting a date for the Appeal Panel**

Once the Standards Officer considers that there is sufficient information to put before the Appeal Panel, they will arrange a meeting to take place as soon as is possible on a date and at a time convenient to everyone involved. Unless the Member objects, the hearing will be on Zoom or similar technology.

## 16 **THE APPEAL PANEL HEARING**

### 16.3 **The Role of the Appeal Panel**

In order to come to its decision, the Appeal Panel will consider all the evidence before the Disciplinary Panel and the written decision of that Panel. It will not rehear that evidence unless it considers that the findings of fact by the Disciplinary Panel are inaccurate or inadequate or that the original hearing was not conducted fairly.

### 16.4 **No further evidence**

The Appeal Panel will not normally hear new evidence unless it is satisfied that not to do so would be unjust.

### **16.5 Procedure at the Hearing**

The Member will present their case first, setting out for the Panel the reasons for the appeal, and will have the last word. Apart from this, and any references to witnesses, the provisions of Section 10 apply to an Appeal Panel hearing.

## **17 THE DECISION OF THE APPEAL PANEL**

### **17.3 Powers of the Appeal Panel**

The Appeal Panel may decide to

17.3.3 Uphold the Disciplinary Panel's decision;

17.3.4 Quash the Disciplinary Panel's decision;

17.3.5 Remit the matter to another Disciplinary Panel for a re-hearing.

### **17.4 Decision by a majority**

In the event of a disagreement between Members of the Appeal Panel, a decision by majority is acceptable. Any disagreement should not be revealed to the parties.

### **17.5 Decision in Writing**

The decision must be in writing and signed by the Chair of the Appeal Panel. It must set out the reasons for the Panel's findings and the evidence relied upon.

### **17.6 Powers of an Appeal Panel in Particular Circumstances**

An Appeal Panel can recommend to the Trustees that the Member be dismissed from Membership in accordance with Article 9.4 of the Trust's Articles of Association.

### **17.7 Notifying the Parties**

The Member and all other interested parties will be notified in writing of the outcome of the appeal, along with the reasons for the decision.

### **17.8 Notifying UK Healers**

The Trust will notify UK Healers that an appeal has been dealt with and whether it has been allowed or dismissed.

## **18 NO FURTHER APPEAL**

The Appeal Panel's decision is final and there is no further right of appeal.

## **19 COSTS OF THE DISCIPLINARY OR APPEAL PANEL**

### **19.1 Expenses of the Parties**

Subject to 19.3 below, each Party is responsible for their own expenses incurred in attending a Disciplinary or Disciplinary Appeal Panel and the Member will not be required to contribute towards the costs of the Trust or the Panel.

**19.2 Expenses of the Disciplinary or Appeal Panel Meeting**

The Trust will meet the expenses of convening a Complaint or Appeal Panel Meeting, and the reasonable expenses of the Complaint Panel Members.

**19.3 Award of Appeal Costs Against a Member**

An Appeal Panel may require the Member to contribute towards the expenses of the Appeal Panel and/or the Trust if their behaviour has been unreasonable or if they have failed to attend the appeal Panel hearing without notice and with no reasonable excuse, but the Member will have the opportunity to make representations to the Appeal Panel before any costs are ordered.

**20 NO REFUND OF SUBSCRIPTION**

Where the Member is suspended or removed, no refund will be given by the Trust of any subscription previously paid for Membership of the Trust.

Next Review Date: 24<sup>th</sup> November 2028