

## **EMPLOYMENT MATTERS COMMITTEE**

**29 JUNE 2011**

### **REVISED ORGANISATIONAL CHANGE POLICY**

Report from: Tricia Palmer, Assistant Director, Organisational Services

Author: Paula Charker, Employee Relations Manager

#### **Summary**

The report seeks agreement to the implementation of the revised Organisational Change and Redundancy Policy.

#### **1. Budget and Policy Framework**

- 1.1 The Policy lies within the Council's policy and budget framework and the Committee's terms of reference. Therefore, this is a matter for the Employment Matters Committee.

#### **2. Background**

- 2.1 The current Organisational Change Policy was agreed by the Employment Matters Committee on 2 November 2010 (minute no. 474/11/2010 refers).
- 2.2 Since then it has become evident that the policy requires updating due to recent legal advice on temporary employees with 12 months service or more.
- 2.3 The proposed revised policy is attached at appendix A.

#### **3. Advice and analysis**

- 3.1 In essence there are not a great deal of variations to the main principles contained within the current policy document, as the statutory requirements for handling significant change including redundancies remain the same.
- 3.2 The statutory consultation periods are adhered to and the council, in the interests of best practice have enhanced the statutory minimum timescales to ensure consultation is undertaken in all significant organisational change.

- 3.3 Throughout the policy there is an emphasis on the need to consult with staff irrespective to whether redundancies are proposed or not.
- 3.4 A Diversity Impact Assessment has been undertaken and is attached as appendix B. The policy outlines the managers' responsibilities, which include a requirement for the manager to consider the diversity implications of any change process that affect the service.
- 3.5 The key proposed changes to the policy are:
- Temporary employees with 12 months continuous service or more at the beginning of the consultation period will be treated the same as permanent employees. (See clause 5.5)
  - Clarification that where employees whose posts have been deleted are being considered for new posts, the normal selection for appointment will apply and it is not necessary to agree redundancy selection criteria. (See clause 7.2).
- 3.6 HR Services will communicate the policy changes to the workforce and ensure that managers are appropriately briefed and trained in the revised arrangements.

#### **4. Consultation**

- 4.1 Consultation on this proposed revised policy has been widespread. Groups included within this process were:
- Medway Council trade unions and Teaching Associations
  - Medway Council Legal Services
  - Assistant Directors and Service managers (those who have volunteered to be consulted on HR policy developments)
  - Disabled Workers Forum
  - Black Workers Forum
  - LGBT Forum
  - HR Services.
- 4.2 Some comments were received and these were taken on board where considered appropriate. These were:
- Clarification on the definition of temporary employees. Comment accepted. (Clause 5.5 in the policy)
  - Some managers asked that the policy be more specific about the amount of time off an employee in a redundancy situation can have to undertake training and/or interviews. As the ACAS guide states "reasonable time off", it was decided to leave this unchanged but provide more guidance to managers as required
  - Some concerns were expressed about the restrictions placed on employees in relation to returning to work for Medway Council as this could place them at a disadvantage (clause 16 in the policy). This is in the current policy and no changes are being recommended.

- 4.3 The Disabled Workers Forum advised that they had no comments to make on the proposed changes.
- 4.4 No comments were received from the trade unions on the proposed changes. The consultation period was from 27 May 2011 to 10 June 2011. UNISON requested on 15 June 2011 that the report be postponed to the next meeting of the Employment Matters Committee, stating: "Unfortunately due to the cuts in facility time in a period of significantly increased workload for the unions, Unison has not had adequate time to respond to this proposed revised policy. We would request that it be removed from the Employment Matters meeting of the 29th and be considered at the next Employment Matters meeting. Clearly we do not consider you have entered into 'meaningful consultation' as the council has limited the Trade Unions ability to respond."
- 4.5 This request was considered and it was decided that the proposed revised policy could not be delayed, as it required updating due to recent legal advice on temporary employees with 12 months service or more. The council's practice was compliant with the legal position but the previous policy was not clear on this point. It was therefore considered important in the light of ongoing organisational change in the council to bring the proposals to Committee at this stage. As stated in paragraph 3.6 above, there are only 2 key proposed changes to this policy.
- 4.6 An extension of the consultation period until close of business on 16 June 2011 was offered to the trade unions but no further communication was received.

## **5. Risk Management**

- 5.1 Medway Council is required to have a procedure in place to deal with organisational change and any redundancies that may arise. The procedure needs to be such that it ensures that the Council is compliant with its statutory obligations. The risk of non-compliance with statutory requirements would leave the Council open to unfair dismissal claims and financial damages at Employment Tribunal. Legal Services have confirmed that the policy is legally sound and compliant with employment law.

## **6. Financial and legal implications**

- 6.1 There are no direct financial implications. However, the maximum compensatory award payable for unfair dismissal at Employment Tribunal is £68,400. In cases involving discrimination compensation is unlimited.
- 6.2 Implementation of the policy enables the Council to implement organisational change, which not only comply with its legal obligations but are also based on fair and transparent principles. Compliance with

these principals minimises the risk of successful challenges on the grounds of unfair dismissal. The Council must also ensure compliance with equality legislation in the application of the policy.

- 6.3 The leading statutory authority lies with:
- Equalities Act 2010
  - Employment Rights Act 1996
  - Employment Relations Act 1999

## **7. Recommendations**

- 7.1 That the Employment Matters Committee agrees the revised Organisational Change Policy, as set out in Appendix A to the report.
- 7.2 That officers review the Organisational Change Policy bi-annually and report to Members when necessary with any changes.

### **Lead officer contact**

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### **Background Papers:**

ACAS Guide to managing redundancies

ACAS Guide to "Changing contracts of employment"

Local Government Employers "39 Steps to Redundancy Handling"

Employment Matters Committee 2 November 2010

Appendix A



# Organisational change Policy

*(including redundancy)*

June 2011



## **1.0 Introduction**

1.1 This policy sets out Medway Council's approach to dealing with potential redundancies, team/service and organisational changes, which would have a material impact on individual's roles and/or responsibilities.

1.2 Organisational changes are likely to be different in nature, size and scope: The council will adopt the processes and procedures that are most appropriate to the particular circumstances of each change.

1.3 The council will endeavour to manage any change fairly and as quickly as is reasonable and appropriate to the circumstances, taking into account its statutory obligations. Management, employees and the trade unions will aim to work constructively together to minimise periods of disruption and uncertainty in organisational change.

1.4 When the change could result in redundancies, Medway Council's policy is to avoid these wherever possible, where this is unavoidable, the council will make certain that decisions are made in a fair and consistent manner to ensure:

- the total number of redundancies made is kept to a minimum;
- employees and their trade union representatives are appropriately consulted on any proposals and their implementation;
- selection for redundancy is based on clear criteria that will, as far as possible, be objectively and fairly applied;
- every effort is made to redeploy or find alternative work for employees selected for redundancy; and support and advice is provided to employees selected for redundancy to help them find suitable work when their employment has come to an end.

## **2.0 Constitution**

2.1 Para 3.1, Part 4, Ch 3 of Council Constitution states that Directors may agree to reorganisations within their departments subject to there being:

- no significant service policy implications or clear departure from existing council policies;
- no expenditure in excess of budget;
- no growth in net expenditure beyond the current year;
- no changes affecting Directors or Assistant Directors;
- consultation with the Assistant Director, Organisational Services.

2.2 A Cabinet/Council decision will be required if a proposed reorganisation falls outside of the above delegations. Cabinet will be asked to consider the service policy implications and agree the proposal to consult, and Council will be asked to delegate the responsibility of considering the outcome of consultations to the Director.

2.3 Changes, which fall outside of the constitutional requirements outlined above, will be managed within normal managerial responsibilities.

### **3.0 Scope**

3.1 This policy applies to all staff except schools based staff, centrally employed teachers who are covered by the School Teachers Pay and Conditions Document, all staff employed at short stay schools, previously known as Pupil Referral Units, the Chief Executive and The Section 151 Monitoring Officer.

### **4.0 Avoiding or minimising redundancies**

#### **4.1 Definition of redundancy**

An employee who is dismissed shall be taken to be dismissed for redundancy if the dismissal is attributable wholly or mainly to the fact that:

- the council has ceased, or intends to cease, to carry on the business for the purposes of which the employee was employed, or has ceased, or intends to cease, to carry on that business in the place where the employee was so employed; or
- the requirements of that business for employees to carry out work of a particular kind, or for employees to carry out work of a particular kind in the place where he/she was so employed, have ceased or diminished, or are expected to cease or diminish. (*Section 139 (1) Employment Rights Act (ERA 1996)*).

#### **4.2 Avoiding or minimising redundancies**

In order to minimise the need for compulsory redundancies the council will consider alternative measures. These may include some, or all of the following:

- Redeployment;
- Restricting recruitment;
- Reductions in overtime;
- Internal re-organisation – restructuring;
- Natural wastage;
- Retraining;
- Secondments;
- Restrictions on the number of temporary employees placed;
- Voluntary/"bump" redundancy within service or relevant areas.

### **5.0 Responsibilities**

5.1 In situations of material organisational change, responsibilities on managers and employees will be as follows:

#### **5.2 Manager's responsibilities**

- To discuss the business case and agree the appropriate way forward with HR Services.
- to consult with employees and the trade unions at the earliest opportunity where reasonably practicable.

- Approach consultation with an open mind, and consider all feedback received for use in changes to proposals as appropriate.
- Decide on the most appropriate method of informing and consulting with staff, taking into account the statutory provisions.
- To consult with individuals affected by the change, and keep all of their employees informed about the changes throughout the process.
- Keep written records of all discussions held with trades unions and employees.
- Consider the diversity implications of any change process that affect staff at both the planning stage and during the change.

### 5.3 Employee's responsibilities

- To consider reasonable changes to their duties and responsibilities;
- To participate in consultations,
- Continue to conduct their professional duties in a professional manner during organisational change;
- Consider any suitable alternative employment opportunity.

5.4 Where the organisational change is minor in nature and does not constitute a material change the above responsibilities may not apply.

5.5 Temporary employees of Medway Council (full or part time) with 12 months continuous service or more at the beginning of the consultation period will be treated the same as permanent employees. This does not include people employed by external agencies or self-employed.

## 6.0 **Consultation**

6.1 Management and the trade unions will aim to work together to achieve a satisfactory outcome of the consultation process on material organisational change.

6.2 The consultation will be meaningful and will include providing relevant trade unions with the information below for each material organisational change where redundancies are proposed.

Information to be provided:

- the reasons for the proposals;
- the numbers and descriptions of employees it is proposed to dismiss as redundant;
- the total number of employees of any such description employed at the establishment in question;
- the way in which employees will be selected for redundancy;
- how the dismissals are to be carried out, taking account of any agreed procedure, including the period over which the dismissals are to take effect; and
- the method of calculating the amount of redundancy payments to be made to those who are being dismissed.

6.3 The consultation will start in good time and where it is likely to involve more than 20 staff being made redundant consultation will take place in accordance with the statutory minimum as follows:



- at least 30 days before the first dismissal takes effect if 20 to 99 employees are to be made redundant at one establishment over a period of 90 days or less; or
- at least 90 days before the first dismissal takes effect if 100 or more employees are to be made redundant at one establishment over a period of 90 days or less. Sometimes a 90 day consultation period will apply because of the complexities of the proposals, rather than 100 or more employees are likely to be made redundant

6.4 In cases where there are less than 20 employees likely to be made redundant by the proposals the length of the consultation will be variable according to the nature and size of the change.

6.5 Individual employees will be consulted in respect of their own particular circumstances. Where dismissal on the grounds of redundancy is taking place the employee will be afforded a face-to-face meeting with their line manager

6.6 In addition to consulting the trade unions and staff, the Secretary of State at the Department for Business, Innovation and Skills will be notified on form HR1 of proposed redundancies involving twenty or more employees at any one establishment within a period of 90-days or less.

## **7.0 Redundancy selection criteria and process**

7.1 The criteria and process used in selecting employees for redundancy will depend on the existing circumstances and the particular needs of Medway Council at the time and wherever possible be agreed with the trade unions. When selecting employees for redundancy the council will ensure that:

- the chosen criteria is consistently and carefully applied;
- the “pool” for selection is identified correctly;
- the selection criteria used are fair, these may include: skills and/or experience; qualifications; standard of work performance or aptitude for work; attendance or disciplinary record;
- any selection criteria must be substantiated and backed up with objective data;
- application of the selection criteria will comply with equalities legislation to ensure that employees are not discriminated against on any prohibited grounds.

7.2 If employees are being considered for new posts, the normal selection for appointment will apply and it is not necessary to agree a redundancy selection criteria.

## **8.0 Redeployment**

8.1 The council has a Redeployment Policy and has committed to make every effort to redeploy to suitable alternative work any employee who is selected for redundancy. At the same time the council would expect redeployees to be as flexible as possible in their approach to considering redeployment opportunities when seeking to secure an alternative position within the council.

8.2 The council will take account of all relevant circumstances that apply to affected employees and reserves the right to make an offer of redeployment where it considers that the appointment is appropriate subject to reasonable training.

8.3 Employees must consider all offers of suitable alternative employment. Those who unreasonably refuse an offer of suitable alternative employment will lose their entitlement to a redundancy payment.

## **9.0 Time off work to look for new work or for training**

9.1 Reasonable paid time off work, with agreement in advance, is offered to employees seeking alternative work within or outside Medway Council.

9.2 Employees must provide adequate notice to their manager of any interviews or appointments for which they are seeking paid time off.

9.3 Opportunities to access training in job searching skills; CV writing and interview skills will be provided.

## **10.0 Trial Period**

10.1 Offers of alternative employment are subject to a statutory four-week trial period where the provisions of the new contract differ from the original contract.

10.2 The effect of the trial period is to give the Council and the employee a chance to decide whether the new job is suitable without the employee necessarily losing their right to a redundancy payment.

10.3 The trial period may be extended for retraining purposes and this will be agreed in writing. If the employee works beyond the end of the agreed trial period end date any entitlement to a redundancy payment will be lost. However, should the council wish to end the new contract within the four weeks for a reason connected with the new job (as opposed for example, to being dismissed for gross misconduct), the employee will preserve the right to a redundancy payment under the old contract.

## **11.0 Maternity, Additional Paternity Leave and Adoption Leave**

11.1 Employees have a separate legal entitlement to be offered any suitable alternative work that is available if they are made redundant while on:

- maternity leave;
- additional paternity leave; or
- adoption leave.

## **12.0 Termination of employment and dismissal procedure**

12.1 If no suitable alternative employment is found within the redundancy notice period the employee will be dismissed on the grounds of redundancy.

12.2 Depending on the circumstances, the council may waive its right to insist on employees working their notice and instead give a payment in lieu of notice or not require employees to attend work during their notice period.

### **13.0 Redundancy payments**

13.1 Employees who are dismissed on the grounds of redundancy with two or more years' service will be entitled to a redundancy payment. However, there may be instances where a payment may not be made such as where the employee has declined an offer of suitable alternative employment or where the employee is dismissed for another reason such as gross misconduct.

13.2 The amount of this payment will be confirmed when the employee is selected for redundancy and the sum will normally be paid along with the employee's final salary payment or payment in lieu of notice.

13.3 In accordance with Section 162 of the Employment Rights Act 1996 pay matrix, for each year of service that counts, an employee will receive a proportion of weekly pay, which is determined in the following way:

<b>Age</b>	<b>Entitlement</b>
21 years or below	Half a week's pay
22 – 40 years	One week's pay
41 and above	One and a half week's pay

13.4 The maximum entitlement will be 20 years at one and a half weeks' pay = 30 weeks' pay. Medway Council redundancy payment is based on the employee's actual weekly pay.

### **14.0 Appeals**

14.1 An employee who is aggrieved at the decision to select him/her for compulsory redundancy has the right of appeal. The appeal must be lodged in writing with the Assistant Director, Organisational Services within ten working days of the employee receiving written confirmation of their redundancy. The grounds for appeal must be clearly stated.

### **15.0 Organisational change**

15.1 In any organisational change, whether there are redundancies or not, the council commits to:

- seek agreement wherever possible prior to varying contracts of employment;
- undertake the necessary statutory consultation,
- follow a fair procedure;
- give proper written notice of any change of contract; and
- provide a process for employees to appeal where a dismissal exists.

## **16.0 Re-engagement**

16.1 Employees who are dismissed on the grounds of redundancy and take early retirement are unable to take up another post with Medway Council for six months unless prior agreement for an earlier start date is agreed with the Director and the Assistant Director, Organisational Services.

16.2 Employees who are dismissed on the grounds of redundancy and who have received a redundancy payment are unable to take up another post with Medway Council within the amount of week's redundancy payment they have been paid, the minimum amount of weeks being four weeks. i.e.

Scenario 1: an employee who has received a redundancy payment of twenty weeks actual pay would be expected to wait twenty weeks before being able to take up a new post within the council. In exceptional cases the Director and Assistant Director, Organisational Services may agree to a shorter timeframe.

Scenario 2: an employee who has received a redundancy payment of three weeks actual pay would be expected to wait four weeks before being able to take up a new post within the council.

## **17.0 Reporting of severance payments to Employment Matters Committee**

17.1 Details of severance payments will be reported to Employment Matters Committee on a quarterly basis.

## **18.0 TUPE**

18.1 This policy does not apply to transfers under the Transfer of Undertakings (protection of Employment) Regulations 2006 (TUPE regulations).

## **19.0 Diversity Impact Assessment**

19.1 Medway Council will consider the assessment of the impact that changes to policies, procedures and practices could have on different equality groups.

## **20.0 Additional Support**

20.1 The council will provide free confidential counselling and information support through its' Employee Assistance Provider, Care First.

## **21.0 Review of procedure**

21.1 This procedure will be reviewed on a bi-annual basis or sooner if organisational needs or legislative changes require it.

<b>Directorate Business Support Department</b>	<b>Name of Function or Policy or Major Service Change</b> <b>Organisational Change Policy (including Redundancy)</b>		
Officer responsible for assessment  Paula Charker, Employee Relations Manager	Date of assessment  10 June 2011	New or existing?  Existing	
<b>Defining what is being assessed</b>			
<b>1. Briefly describe the purpose and objectives</b>	Set out clearly and concisely the councils approach to managing organisational change. In doing so to: <ul style="list-style-type: none"> <li>• ensure fair and legal treatment of individuals involved in organisational change, and maintain good employee relations throughout;</li> <li>• ensure the council complies with its legal obligations in terms of managing organisational change and handling redundancies.</li> <li>• ensure the appropriate consultation is undertaken in all cases of organisational change.</li> <li>• encourage managers to seek a mutual agreement on organisational change whenever possible.</li> </ul>		
<b>2. Who is intended to benefit, and in what way?</b>	All stakeholders should benefit either directly or indirectly. The organisation and managers will benefit by having a more flexible approach to managing organisational change whilst at the same time meeting its statutory obligations.  This will provide for a speedier outcome to change in certain circumstances, which benefits both the organisation in terms of service delivery and also employees in terms of aiming to keep anxiety levels to a minimum by not going through a formal process when it is not required.  Medway residents will also benefit by being served by resources being appropriately targeted.		
<b>3. What outcomes are wanted?</b>	The policy is used to enable a flexible approach to managing change whilst meeting its statutory obligations but at the same time enabling the organisation to change more swiftly and cutting out formal processes where they are not needed. This will enable Medway to have an efficient, effective workforce, which offers value for money services to its residents.		
<b>4. What factors/forces could contribute/detract from the outcomes?</b>	<b>Contribute</b>  Meaningful consultation with the trade unions  Training for managers on consultation and use of the policy and procedures.  Effective and early employee engagement and involvement.	<b>Detract</b>  Managers failing to reach a mutual agreement and relying on formal process where and when it is not needed.  Management confidence and competence to manage organisational change effectively.  Managers failing to communicate and consult when and where appropriately.	

<b>5. Who are the main stakeholders?</b>	Managers, employees and trade unions	
<b>6. Who implements this and who is responsible?</b>	HR Services and managers implement the procedure.	
<b>Assessing impact</b>		
<b>7. Are there concerns that there <u>could</u> be a differential impact due to <i>ethnicity/ racial groups</i>?</b>		The policy includes the requirement for a DIA to be undertaken. This will identify any such differential impact.
	NO	It is also recommended that potential issues be considered at the planning stage to assist in identifying any service delivery impact.
<b>What evidence exists for this?</b>	The procedure has been shared with all staff forums, the trade unions, Medway Managers and Legal Services.	
<b>8. Are there concerns that there <u>could</u> be a differential impact due to <i>disability</i>?</b>		The selection criterion of attendance (if used) will take into account the Equalities Act.
	NO	The policy includes the requirement for a DIA to be undertaken. This will identify any such differential impact. It is also recommended that potential issues be considered at planning stage to assist in identifying any service delivery impact.
<b>What evidence exists for this?</b>	The procedure has been shared with all staff forums, the trade unions, Medway Managers and Legal Services.	
<b>9. Are there concerns that there <u>could</u> be a differential impact due to <i>gender</i>?</b>		The law regarding redundancy in relation to maternity, paternity and adoption is clearly outlined in the policy.
	NO	The policy includes the requirement for a DIA to be undertaken. This will identify any such differential impact. It is also recommended that potential issues be considered at the planning stage to assist in identifying any service delivery impact.
<b>What evidence exists for this?</b>	The policy itself.	
<b>10. Are there concerns there <u>could</u> be a differential impact due to <i>sexual orientation</i>?</b>	NO	No evidence to support a differential impact on grounds of sexual orientation.
<b>What evidence exists for this?</b>	The procedure has been shared with all staff forums, the trade unions, Medway Managers and Legal Services. The policy includes the requirement for a DIA to be undertaken. This will identify any such differential impact. It is also recommended that potential issues be considered at the planning stage to assist in identifying any service delivery impact.	
<b>11. Are there concerns there <u>could</u> be a have a differential impact due to <i>religion or belief</i>?</b>		No evidence to support a differential impact on grounds of religion or belief.
	NO	
<b>What evidence exists for this?</b>	The procedure has been shared with all staff forums, the trade unions, Medway Managers and Legal Services. The policy includes the requirement for a DIA to be undertaken. This will identify any such differential impact. It is also recommended that potential issues be considered at	

	the planning stage to assist in identifying any service delivery impact.	
<b>12. Are there concerns there <u>could</u> be a differential impact due to age?</b>	Yes	The statutory redundancy payment calculation based on age and length of service has been declared legal and non discriminatory by the Government. Medway follows this method.
		The re-engagement criterion based upon how many years employed before being able to return to work for the council following redundancy could have a detrimental impact on older workers. However, a flexibility clause has been included to allow for the Director and Assistant Director to reduce the time frame if they wish to.
<b>What evidence exists for this?</b>	The procedure has been shared with all staff forums, the trade unions, Medway Managers and Legal Services. The policy includes the requirement for a DIA to be undertaken. This will identify any such differential impact. It is also recommended that potential issues be considered at the planning stage to assist in identifying any service delivery impact.	
<b>13. Are there concerns that there <u>could</u> be a differential impact due to <i>being transgendered or transsexual?</i></b>	NO	
<b>What evidence exists for this?</b>	The procedure has been shared with all staff forums, the trade unions, Medway Managers and Legal Services. The policy includes the requirement for a DIA to be undertaken. This will identify any such differential impact. It is also recommended that potential issues be considered at the planning stage to assist in identifying any service delivery impact.	
<b>14. Are there any other groups that would find it difficult to access/make use of services, or who might experience unfavourable treatment, as a result of the function/ policy/ service change (eg people with caring responsibilities or dependants, those with an offending past, or people living in rural areas)?</b>		
	NO	
<b>What evidence exists for this?</b>	The procedure has been shared with all staff forums, the trade unions, Medway Managers and Legal Services. The policy includes the requirement for a DIA to be undertaken. This will identify any such differential impact. It is also recommended that potential issues be considered at the planning stage to assist in identifying any service delivery impact.	
<b>15. Are there concerns there <u>could</u> be a differential impact due to <i>multiple discriminations</i> (eg disability and age)?]</b>		
	NO	
<b>What evidence exists for this?</b>	The procedure has been shared with all staff forums, the trade unions, Medway Managers and Legal Services.	

	The policy includes the requirement for a DIA to be undertaken. This will identify any such differential impact. It is also recommended that potential issues be considered at the planning stage to assist in identifying any service delivery impact.
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<b>Conclusions &amp; recommendation</b>		
<b>16. Could the differential impacts identified in questions 7-15 amount to there being the potential for adverse impact?</b>	NO	
<b>17. Can the adverse impact be justified on the grounds of promoting equality of opportunity for one group? Or another reason?</b>	NO	The policy should be applied consistently to all staff within the scope of the policy in line with the Council's Equal Opportunity Policy.

<b>Recommendation to proceed to a full impact assessment?</b>		
<b>NO</b>	<b>This function/ policy/ service change complies with the requirements of the legislation and there is evidence to show this is the case.</b>	
	<b>What is required to ensure this complies with the requirements of the legislation?</b> (see DIA Guidance Notes)	Nothing
	<b>Give details of key person responsible and target date for carrying out full impact assessment</b> (see DIA Guidance Notes)	

<b>Action plan to make minor modifications</b>		
<b>Outcome</b>	<b>Actions (with date of completion)</b>	<b>Officer responsible</b>

<b>Planning ahead: Reminders for the next review</b>	
<b>Date of next review</b>	2 years time
<b>Areas to check at next review (eg new census information, new legislation due)</b>	Check whether any particular groups have experienced: i. difficulties in accessing or making use of the policy; ii. the application of the policy has been fair and consistent across the council.
<b>Is there <i>another</i> group (eg new communities) that is relevant and ought to be considered next time?</b>	Check that the function/policy/service continues to be accessible and fairly applied to members of the Council's workforce, including any additional demographic groups.



<b>Signed (Assistant Director, Organisational Services)</b>	<b>Date</b>	
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<b>Related documents</b>
List here