

# Flexible Working Policy

(includes remote working)

May 2023

## **Document Profile**

Document Registration	Added following ratification					
Туре	Policy					
Title	Flexible Working Policy					
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Version control / changes made

Date	Version	Summary of changes made	Author
May 2022	1	Revised policy which replaces current policy contained within Staff Handbook	Mo de Gruchy
May 2023	2	Reflects the ethos of flexible working as set out by NHS England. Now includes informal flexible working arrangements. No longer limits application for flexible working to 1 per rolling 12 month period. Now includes remote working arrangements.	Quality and

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#### 1. INTRODUCTION

#### 1.1 Rationale

The Covid pandemic changed how people work and organisations such as Family Nursing & Home Care (FNHC) have been challenged to look at new ways of working that include greater flexibility around:

- When the work needs to be done
- Where the work needs to be done
- **How** work is planned and undertaken

NHS (2022)

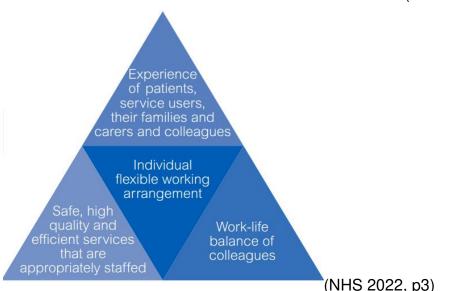
Flexible working arrangements may be requested for a variety of reasons (RDaSH 2021). It is an approach that supports the healthy work/life balance of employees and the organisation's commitment to the delivery of safe and effective services. Family Nursing & Home Care wishes to facilitate such opportunities wherever this is possible and in a way that is fair, equitable and consistent.

This policy builds on the first version of the organisation's Flexible Working Policy and incorporates recent work undertaken by the NHS in this field, including more use of remote working. Remote working has become a new norm for many and FNHC recognises that it could do more to use this as a flexible working solution that can improve employees' work-life balance as well as bringing benefits to the organisation.

For the purpose of this policy, flexible working is defined as "an arrangement which supports an individual to have greater choice in when, where and how they work" (NHS 2022 p. 2). However, the needs of the individual have to be balanced with:

- patient/service user and staff experience
- service delivery
- work-life balance of colleagues

(NHS 2022, p.2)



Flexible working arrangements may be formal or informal and may be implemented on a short-term or long-term basis. They may also be implemented in shift/session and non-shift/session-based roles (NHS 2022)

Family Nursing & Home Care is committed to considering requests from all employees including discussions/requests during the recruitment process.

## 1.2 Scope

This policy applies to all FNHC employees employed on a permanent or fixed term contract.

In the case of formal flexible working requests, this policy does not apply to staff employed by the Government of Jersey and working through a contract for services. It does however apply to this cohort of staff in relation to informal flexible working requests.

## 1.3 Role and Responsibilities

## **Chief Executive Officer (CEO)**

The CEO has overall responsibility for ensuring that this policy meets the requirements of the organisation. They are also responsible for leading the organisation's commitment to flexible working practices.

#### **Director of Governance and Care**

The Director of Governance and Care is responsible for ensuring that the organisation maintains an up to date flexible working policy and that systems are in place for monitoring that its use is fair, consistent and equitable.

## Registered Managers/Heads of Service

Registered Managers/Heads of Service are responsible for monitoring that all requests for flexible working (informal and formal) are treated fairly, equitably and consistently. They are also responsible for creatively exploring options to facilitate flexible working where a line manager and staff member have been unable to reach a satisfactory agreement.

#### **Line Managers**

Line managers are responsible for:

- considering where flexible working could benefit their team and service provision
- initiating conversations about flexible working at all stages of an individual's career
- reviewing requests for flexible working in a timely and supportive manner
- ensuring that all requests for flexible working (informal and formal) are treated fairly, equitably and consistently
- ensuring that there is a balance between the needs of the employee and the needs of the service
- notifying HR of employees' applications for formal flexible working

#### **Human Resources Department**

The Human Resources Department are responsible for:

- providing advice or guidance where requested
- encouraging service leads to consider flexible working arrangements for all roles being advertised
- monitoring that applications for formal flexible working are treated fairly, equitably and consistently
- complying with the procedures set out in this policy

## **Employees**

Employees are responsible for:

- communicating with their Line Manager when they identify a need to work flexibly
- submitting a request for formal flexible working arrangements by completing the required application form
- engaging and communicating with managers as requested
- adhering to the requirements of this policy

#### 2. POLICY

## 2.1 Principles

The following principles have been taken from the NHS document Flexible Working: raising the standards for the NHS (2022) and adapted where appropriate:

"Individuals should have an opportunity to request to work flexibly from day one of employment. Flexible working opportunities should be offered at all stages in a career, regardless of role, grade, or the reasons for wanting to work flexibly.

Not all roles are suitable for every flexible working opportunity and may not facilitate a flexible working arrangement all the time. Requests for flexible working are therefore considered on a case-by-case basis.

Job roles ... are designed and advertised in ways that promote the most flexible, appropriate working opportunities, with the organisation initiating conversations about flexible working from advert through to each stage of an individual's working life.

All requests for flexible working should be considered on individual merit. Managers should particularly have due regard for applications where the individual has additional protections from the Discrimination (Jersey) Law 2013 (for example, to meet childcare needs, as an adjustment to support a disability or to meet religious requirements).

Individuals, managers and teams work together to explore the flexible working options that are available and seek a practical arrangement that supports the individual while:

- providing the best experience for patients/service users, their families and carers
- maintaining safe, high quality, efficient services that are appropriately staffed
- maintaining the work-life balance of colleagues

Those who have an agreed flexible working pattern should not be treated any less favourably in terms of pay rates, selection for promotion etc than colleagues who do

not work a flexible working arrangement. Any adjustments to pay and benefits should be pro-rated that of a full time individual.

Managers look to saying 'yes' to a flexible working request whenever they can. Teams and managers are encouraged to collaborate to think creatively about flexible working solutions, and trial different flexible working options to identify what works best.

Managers recognise that legislation enabling one flexible working request to be made in a 12-month period may not always be in harmony with the changes taking place in an individual's personal and professional life. The approach to making and granting flexible working arrangements should be a collaborative one between individuals and their manager. If an individual's first request for flexible working is declined, the individual should be supported to review their request and consider alternative arrangements consistent with any previous feedback. This approach should minimise repeated applications and the disappointment that might accompany any refusals.

Managers and individuals jointly agree review periods and discuss flexible working as part of regular health and wellbeing conversations to consider whether any additional alternative arrangements are needed to meet the needs of the individual and the business.

As flexible working agreements (including those put in place to support parental and caring responsibilities) may be subject to change, individuals and managers should agree how any changes should be planned, communicated and implemented."

## 2.2 Record Keeping

"It is good practice to capture conversations about informal and formal flexible working arrangements in writing. Some arrangements may require a variation to the individual's contract" (NHS 2022, p.3).

Formal requests for flexible working are made using the approved Flexible Working Application Form (appendix 1).

When such changes are agreed, the employee is notified in writing specifying what the changes are and the date they become effective. If all or any part of the request is declined, FNHC will give, in writing, an explanation of why it cannot agree to the request.

All records pertaining to formal flexible working requests are saved in the individual's personnel file.

Other records e.g. emails, pertaining to informal arrangements are kept for an appropriate time by the Line Manager.

## 2.3 Declined Requests and Right of Appeal

Line Managers should start at the 'yes' position when considering a request for flexible working (informal or formal). Every effort should be made to facilitate the request but where the Line Manager and colleagues cannot find a solution, there should be escalation to a more senior manager to see if other options exist.

Family Nursing & Home Care may have to decline a request on certain grounds, including but not limited to the:

effect on ability to meet service demand

inability to re-organise work amongst others or to recruit additional employees

- impact upon quality or performance
- insufficient work available when employee proposes to work
- burden of additional costs
- planned structural changes in the workplace

See <u>section 3.2 Application Process</u> for response timelines (formal flexible working requests).

The employee has the right to appeal against the decision of the Manager (see <u>section</u> 3.2 for formal flexible working appeals process).

## 2.4 Remote Working

Remote working opens up many new opportunities for flexible working and flexible service provision, bringing benefits to patients/service users, staff and the organisation.

Family Nursing & Home Care understands that many roles need staff to be 'in person' however, it also recognises that there may still be scope to embrace remote working for certain tasks e.g. daily 'huddle'; virtual training; report writing.

The availability and use of IT is important for remote working and staff working remotely have a responsibility to ensure that they have access to the required hardware and systems. Family Nursing & Home Care will not provide desks and/or chairs when staff choose to work from home.

## 2.4.1 Remote Workers' Health and Safety

Where staff work remotely on a long-term basis or routinely undertake <u>hybrid working</u>, a risk assessment should be completed taking a balanced and proportionate approach. See Managing home workers' health and safety - Risk assessment - HSE

The wellbeing of staff working remotely needs to be considered by Line Managers and individuals themselves. This link to the Health and Safety Executive Home working - HSE offers useful guidance as do resources in appendix 3

#### 3. PROCEDURE

## 3.1 Informal Flexible Working Requests

There are many reasons why staff may request to work flexibly and not all will require this to be a formal arrangement. Examples of informal flexible working can be found in section 8 (Glossary of Terms).

Requests can happen on the day or may be pre-planned. Staff should discuss the request for flexible working with their line manager in as timely a manner as the situation allows. Where it is not possible to have a face to face conversation, communication may be by phone or email.

Line Managers should start at the point of 'yes' when considering requests. The flexible-working-toolkit-for-line-managers should be used to aid decision-making.

It is recommended that all such discussions are recorded e.g. email from the line manager confirming the arrangement.

## 3.2 Application Process (formal)

Examples of formal flexible working can be found in <u>section 8</u> of this policy (Glossary of Terms). Before applying for formal flexible working arrangements, it may be helpful to use the <u>flexible-working-toolkit-for-individuals</u>.

Employees applying for (formal) flexible working should complete a <u>Flexible Working Application Form</u> (Appendix 1) and submit it to their Line Manager. This will be used to aid decision making and should include detailed information as to:

- why flexible working is required, by giving the reason for the application
- what flexible working is needed
- the date when flexible working is required from
- how this may impact upon FNHC and their service area
- how FNHC or their service area could accommodate this request
- what concerns will need to be addressed (if any)

The <u>flexible-working-toolkit-for-line-managers</u> should be used by Line Managers to aid decision-making. Where they (and their team) are unable to find a solution to agree the request for flexible working, this should be escalated to a more senior manager.

The Line Manager will arrange a meeting with the employee within 28 days of the application being received and will inform the employee of the outcome within 2 weeks of this meeting occurring (see section 2.2 Recordkeeping).

N.B. if the Line Manager is not working on the date the application is received, these timelines will run from the Line Manager's next working day.

See flow chart in appendix 2.

## 3.3 Right of Appeal

Employees have the right to appeal if their request for flexible working is declined, either as a whole or in part. In the case of formal flexible working requests, appeals are to be made in writing to a member of the Senior Management Team within 14 days of receiving the outcome. Any such appeal must set out the grounds of the appeal.

Within 14 days of the appeal being received, an appeal meeting will be arranged by one of the Senior Management Team and the decision following any appeal will be final. This decision will be given in writing within 14 days of the appeal hearing.

## 3.4 Leading a Flexible Team

The NHS document <u>Supporting your team to work flexibly - a line manager's guide</u> provides useful resources for managers. It advocates the following ways to successfully promote and embed flexible working:

**Lead by example.** Be a role model, be open about your own flexibility and how you're managing your wellbeing. Book out space in your own diary for family time, out-of-work activities or breaks. Log off visibly and be clear that you don't expect replies out of hours.

Trust people to do their jobs on a flexible basis. Don't wait for them to 'earn' it.

**Be accessible**. Let your team know they should contact you if they need support. Create spaces in your diary where they can catch up with you outside of a formal meeting.

Consciously reward and recognise people for the outcomes they are achieving – not for working additional hours or being always present. This can unconsciously reinforce certain behaviours eg 'presenteeism'.

**Drive the conversation on flexible working.** Bring it up with people in health and wellbeing conversations, in one-to-ones, at end of year, and during recruitment conversations. Even if the individual doesn't want to work flexibly right now, mentioning it proactively will say a lot about how your team works.

Consider flexible working options when you are advertising vacancies. Be clear about the types of flexibility that would work well in the role, and make it clear that conversations around flexibility are welcomed at interview stage to encourage a greater diversity of talent.

**Talk to other teams about what you are doing.** Share your good practice and learn from theirs.

Other resources to support flexible working are in appendix 3

## 3.5 Working Remotely

Working from any location that is not their usual working environment can present many challenges. When working remotely, it is important that a safe working environment can be achieved. Staff must bear in mind the requirements of all relevant policies/procedures including (but not limited to):

- Lone Worker Policy
- Health and Safety Policy
- Fire Safety Standard Operating Procedures
- Display Screen Equipment Policy
- Mobile Devices Policy
- Information Governance Policy

See <u>appendix 3</u> for resources to support remote working.

#### 3.5.1 Personal Safety and Wellbeing

When working remotely, staff need to consider their personal safety and wellbeing and have in place a robust plan to ensure they stay safe and well at all times.

Staff should work with their Line Manager to complete a risk assessment for remote working (see <u>section 2.4.1 Remote Workers' Health and Safety</u>).

When staff are working remotely, particularly for an extended period, it is important that good lines of communication are in place with their Line Manager and team.

## 3.5.2 Display Screen Equipment (DSE)

Some remote locations e.g. when working from home, will challenge employees to find creative solutions for setting up their workstation appropriately. This video provides guidance for how a workstation can be created at home using commonly available items <a href="https://www.youtube.com/watch?v=ynExiaVwobs&feature=emb">https://www.youtube.com/watch?v=ynExiaVwobs&feature=emb</a> rel end.

Staff are responsible for ensuring that they can achieve a safe workstation set up and should use the DSE Workstation checklist available in the Health and Safety folder in Central Filing. This assessment should be discussed with their Line Manager and the requirements of the DSE Policy followed.

## 3.5.3 Confidentiality and Cyber Security

Working remotely can mean that the physical environment is not always optimal for good information governance. Staff must be very aware of this and take all necessary steps to ensure that confidentiality and good information governance practice, including cyber security, is maintained at all times. The following 'Cyber Bytes' from the Government of Jersey provide guidance for working securely wherever staff are located:

## **Remote Working**

Wherever we are working from, we must understand the risks we face and know how to stay secure.

## So, what do we mean by remote working?

This refers to those who work and access Government systems and data from locations other than their usual physical location.



#### Connecting remotely

If you are out and about, avoid using public WiFi. These networks are often unencrypted and can be exploited by cybercriminals, allowing them to steal any information you transmit over the network.

Once you have a secure internet connection, you can connect to our network.





Government of Jersey (2023)

## 4. CONSULTATION PROCESS

Name	Title	Date
Amanda de Freitas	Head of Human Resources	3/03/23
Sue Ashford	Human Resources Officer	3/03/23
Mo de Gruchy	Quality and Performance Development Nurse	3/03/23
Claire White	Director of Governance and Care	27/03/23
Elaine Walsh	Director of Finance	27/03/23
Tia Hall	Registered Manager – Adult Services	
Michelle Cumming	Registered Manager – Child and Family Services	27/03/23
Clare Stewart	Registered Manager - RRRT	27/03/23
Teri O' Connor	Registered Manager – Home Care	27/03/23
Claire Whelan	Head of Information Governance and Systems	27/03/23
Michael Gardner	chael Gardner Head of Finance	
Justine Le Bon Bell	Head of Education and Development	27/03/23

## 5. IMPLEMENTATION PLAN

Action	Responsible Person	Planned timeline
Email to all staff	Education and Development Secretary/Administrative Assistant	Within 2 weeks following ratification
Policy to be placed on the Procedural Document Library	Education and Development Secretary/Administrative Assistant	Within 2 weeks following ratification

## 6. MONITORING COMPLIANCE

Registered Managers, Heads of Service/Departments and the Human Resources Department should maintain an awareness of flexible working practices, checking that they are fair and that there is equality of outcomes.

## 7. EQUALITY IMPACT STATEMENT

Family Nursing & Home Care is committed to ensuring that, as far as is reasonably practicable, the way services are provided to the public and the way staff are treated

reflects their individual needs and does not discriminate against individuals or groups on any grounds.

This policy document forms part of a commitment to create a positive culture of respect for all individuals including staff, patients, their families and carers as well as community partners. The intention is to identify, remove or minimise discriminatory practice in the areas of race, disability, gender, sexual orientation, age and 'religion, belief, faith and spirituality' as well as to promote positive practice and value the diversity of all individuals and communities.

The Family Nursing & Home Care values underpin everything done in the name of the organisation. They are manifest in the behaviours employees display. The organisation is committed to promoting a culture founded on these values.

## Always:

- ✓ Putting patients first
- ✓ Keeping people safe
- ✓ Have courage and commitment to do the right thing
- ✓ Be accountable, take responsibility and own your actions
- ✓ Listen actively
- ✓ Check for understanding when you communicate
- ✓ Be respectful and treat people with dignity
- ✓ Work as a team.

This policy should be read and implemented with the Organisational Values in mind at all times. See <a href="Appendix 4">Appendix 4</a> for the Equality Impact Screening Tool for this document.

#### 8. GLOSSARY OF TERMS

## **Hybrid Working**

Hybrid working is a form of flexible working where workers spend some of their time working remotely (usually, but not necessarily, from home) and some in the employer's workspace. (CIPD 2021, p.3)

#### **Remote Working**

This is the term used to describe the situation when an individual works away from their usual place of work e.g. working from home, from another work location, off-island. Other terms sometimes used to describe this are mobile-working or teleworking.

The following definitions are taken from the NHS document Flexible Working: raising the standards for the NHS (2022, p.3-5):

## Informal flexible working arrangement

These arrangements are usually agreed between the individual and their line manager (or equivalent) as and when needed and don't normally require a formal contractual change. Examples of informal arrangements could include:

- Swapping shifts/sessions
- Mixing shifts/sessions (e.g. working some long and some short shifts/sessions)

- Time off in lieu (TOIL)
- Flexi-time
- Staggered hours where start, finish and lunch/break times can be variable (usually set around a period of 'core hours')
- Working from home (a role in which the individual has a defined office base but can work at home for part of their working week)

## Formal (contractual) flexible working arrangement

These arrangements may initiate a change to an individual's contract as they can have an impact on pay, pension and/or annual leave calculations or have corporate governance implications. As such, an HR representative (or equivalent management) should be consulted before any changes to an agreed working arrangement is made. Examples may include:

- Part time hours
- Job sharing
- Annualised hours
- Zero-hours contract
- Compressed hours
- Term-time working
- Fixed shifts/sessions/schedules (individuals work days only)
- Rotating shift/session work (individuals rotate between different patterns, such as days and nights)
- Split shift/session schedules (where an individual's working day is split into two
  or more parts with a rest period between. The rest period does not include paid
  breaks or allocated lunch periods)
- Phased retirement
- Home working (a role in which the individual spends all their working week based at home)
- Mobile working (teleworking) which enables the individual to work from a different location for all or part of their working week
- Sabbaticals

#### Shift/session-based role

A shift/session-based role (or job) refers to a work schedule in which an individual regularly works some or all of their working week **outside of the organisation's defined core business hours**. Shift/session-based work schedules may be fixed or rotational, and may cover morning, afternoon, evening and nights in addition to on-call activities. On-call, out of hours or standby activities are those where individuals are expected to be available for work outside of their regular hours, sometimes at short notice.

#### Non-shift based role

Individuals in non-shift-based roles normally work most of their contracted hours within the organisation's defined core business (traditionally seen as Monday to Friday, 9am

to 5pm). These include roles where an individual has an on-call commitment (as defined in the above section) but doesn't work outside of office hours for most of their normal working week.

## **Short-term flexible working arrangement**

A temporary working arrangement which is put in place to cover emergency and/or unplanned events. These arrangements are not expected to last more than 28 calendar days (e.g. to manage an urgent change in childcare arrangements, or to repair a broken boiler). Short-term requests are normally agreed between the individual and their line manager.

## Long-term flexible working arrangement

A working arrangement which is expected to occur on more than one occasion and/or be in place for 29 or more calendar days. Long-term requests are more likely to be a formal arrangement and are normally agreed by line-managers. They may, when needed, involve consultation with an appropriate HR (or equivalent management personnel) and union representatives.

#### 9. REFERENCES

CIPD (2021) Hybrid Working, practical guidance; <u>hybrid-working-practical-guidance-2021 tcm18-103709.pdf (cipd.co.uk)</u> (last accessed 24/02/23)

Government of Jersey (2023) Cyber Bytes, from HCS staff communications (last accessed 4.04.23)

NHS (2022a) Flexible Working: raising the standards for the NHS; available at <u>B0395-flexible-working-raising-the-standards-for-the-NHS.pdf</u> (england.nhs.uk) (last accessed 22/02/23)

NHS (2022a) Supporting Your Team to Work Flexibly, A Line Manager's Guide <u>flexible-working-toolkit-for-line-managers</u> (last accessed 3/03/23)

NHS (2022b) Flexible Working in the NHS, A toolkit for Individuals <u>flexible-working-toolkit-for-individuals</u> (last accessed 3/03/23)

Rotheram, Doncaster and South Humber NHS Foundation Trust (2021) Flexible Working Policy and Procedure:

<u>Flexible Working Policy and Procedure – RDaSH NHS Foundation Trust</u> (last accessed 22/02/23)

#### 10. APPENDIX

## 10.1 Appendix 1 Application for Formal Flexible Working

## Guidance note to the employee

You can use this form to make an application to work flexibly under the right provided in law. Before completing this form, you should first read the FNHC Flexible Working Policy and Procedure.

You should note that in accordance with the policy, it may take up to 28 days to consider a request before it can be implemented and possibly longer where difficulties arise. You should therefore ensure that you submit your application to the appropriate person well in advance of the date you wish the request to take effect.

It will help your manager to consider your request if you provide as much information as you can about your desired working pattern. It is important that you complete all the questions as otherwise your application may not be valid.

When completing the sections below, think about what affect your change in working pattern will have both on the work that you do and on your colleagues, specifically:

- why flexible working is required, by giving the reason for the application;
- what flexible working is needed;
- the date when flexible working is required from;
- how this may impact upon FNHC and their department;
- how FNHC or department could accommodate this request; and
- what concerns will need to be addressed (if any)

Once you have completed the form, you should immediately forward it to your manager (you might want to keep a copy for your own records). Your manager will then have 28 days after the day your application is received in which to arrange a meeting with you to discuss your request.

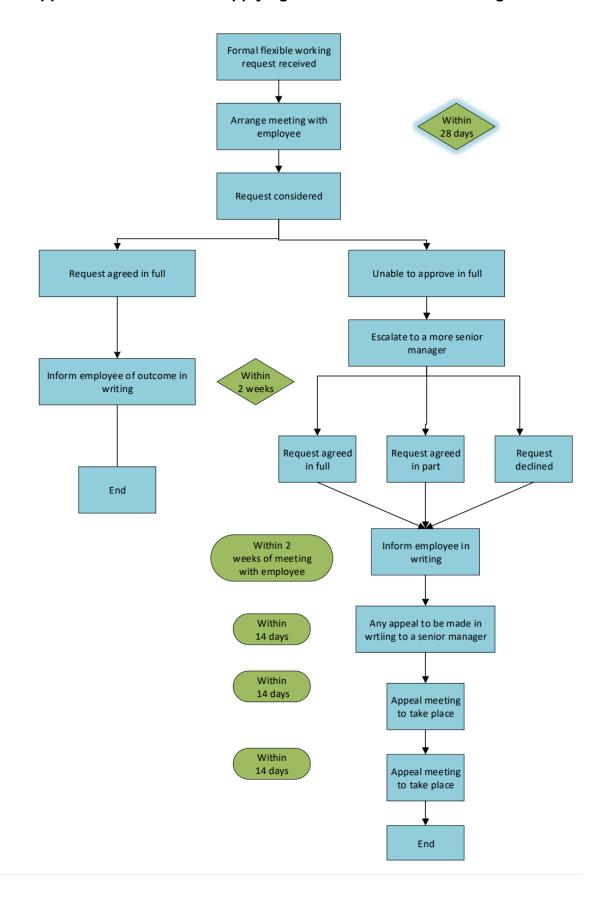
#### Guidance note to the Manager

This is a formal application made under the legal right to apply for flexible working. Within 28 days (from date of receipt), you must either agree to the request or arrange a meeting with your employee to discuss their request. If FNHC agrees to any or all of the changes requested, FNHC will write to the employee specifying what the changes are and the date they become effective. If the decision is not in favour of all or any part of the request, FNHC will give the statutory reason and explanation of why it cannot agree to the request.

FORMAL FLEXIBLE WORKING APPLICATION FORM			
Employee name:			
Line manager name:			
Proposed change to to	erms and condition of employment		
Confirm WHETHER and WHEN yo	ou are requesting ANY OR ALL of the following:		
(Please tick all of the below which	apply)		
A change to your hours of work	$\square$ To take effect from (date)		
A change to your times of work	☐ To take effect from (date)		
A change to your place of work	☐ To take effect from (date)		
Explain exactly the change(s) to you are requesting:	our terms and conditions of employment that you		
	Rationale		
	nk the proposed change would have on FNHC's on any such effect might be dealt with.		
This application is true and accura	ate to the best of my knowledge and belief.		
Signed:	Date:		
Signed	Date Received		

Line Manager/ HR

## 10.2 Appendix 2 Flow Chart – Applying for Formal Flexible Working



## 10.3 Appendix 3 Resources to support flexible working arrangements

Working remotely top tips UK (cipd.co.uk)

Remote teams UK (cipd.co.uk)

hybrid-working-practical-guidance-2021 tcm18-103709.pdf (cipd.co.uk)

https://www.cipd.co.uk/Images/hybrid-working-practical-guidance-2021 tcm18-103709.pdf

Online meetings UK (cipd.co.uk)

Working from home and hybrid working | Acas

## 10.4 Appendix 4 Equality Impact Screening Tool

Stage 1 - Sc	Stage 1 - Screening						
Title of Procedural Document: Flexible Working Policy							
Date of Asses	23/02/23	Respons	sible Depart	ment	Quality & Governance		
Name of person completing assessment		Elspeth Sno	owie	Job Title	Head	of Quality and Safety	

# Does the policy/function affect one group less or more favourably than another on the basis of :

	Yes/No	Comments
• Age	No	
Disability	No	
Learning disability; physical disability; sensory impairment and/or mental health problems e.g. dementia		
Ethnic Origin (including hard to reach groups)	No	
Gender reassignment	No	
Pregnancy or Maternity	No	
Race	No	
• Sex	No	
Religion and Belief	No	
Sexual Orientation	No	

If the answer to all of the above questions is NO, the EIA is complete. If YES, a full impact assessment is required: go on to stage 2, page 2

## Stage 2 - Full Impact Assessment

What is the impact	Level of Impact	Mitigating Actions (what needs to be done to minimise / remove the impact)	Responsible Officer

## **Monitoring of Actions**

The monitoring of actions to mitigate any impact will be undertaken at the appropriate level