Closed Circuit TV Policy

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Prepared By: CCTV Policy Development Working Group
Effective From: March 2009
Review Date: March 2010
Lead Reviewer: Prof. Craig White, Clinical and Care Systems Development Lead
Mr John Wright, Director of Information and Clinical Support Services
Dissemination Arrangements:
- AthenA
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1.0 Statement & Introduction

1.1 The purpose of this policy is to ensure that NHS Ayrshire and Arran complies with relevant legislation (listed at bullet 2.1), while also protecting and providing security to individuals, property and/or land which the organisation owns and controls. In order to assist in fulfilling its duty of care to provide protection and security for employees and others who use these properties the organisation has a Closed Circuit Television (CCTV) surveillance system in place at many of these locations.

1.2 Surveillance of any sort can be intrusive and impact on people’s privacy. No CCTV will be initiated, installed, moved or replaced until a full impact assessment has been undertaken. Installation, positioning, movement or replacement of CCTV will take account of the balance of risks to safety and/or security as well as the outcome of the impact assessment.

1.3 Any changes to this policy will require the approval of the Chief Executive and the Director of Information and Clinical Support Services.

1.4 This policy will be reviewed annually to ensure that it continues to be effective and comply with existing legal requirements.

1.5 There will be operational procedures to underpin this policy.

2.0 Objectives

2.1 The objectives of this policy are to ensure that NHS Ayrshire and Arran:


- Complies with the Information Commissioner’s Office, CCTV Code of Practice at all times.

- Operates its CCTV system safely and efficiently.

- Provides employees with an understanding of the purpose, management and operation of the system and their role in supporting this.

3.0 Scope of the Policy

3.1 This policy covers all employees, persons providing a service, patients and visitors whose image(s) may be captured by CCTV owned and operated by NHS Ayrshire and Arran.
4.0 Definition of Terms

4.1 Personal Data – as defined by the Data Protection Act 1998, as applicable to CCTV, is an image or other information from which a living individual can be identified, where:

- The individual is the focus of the image
- The image contains significant information about that individual
- The processing of the image affects the individual's privacy.

4.2 Processing – Operations carried out on the images such as; obtaining, recording, holding of images, downloading, copying and disclosing images.

5.0 Legal Context

5.1 Data Protection Act 1998

The CCTV system must comply with the following eight data protection 'Principles':

- Personal data must be processed fairly and lawfully.
- Personal data shall be obtained for only one or more lawful purpose and must not be further processed for incompatible purposes.
- Personal data shall be adequate, relevant, and not excessive.
- Personal data shall be accurate, and where necessary, kept up to date.
- Personal data shall not be kept for longer than necessary.
- Personal data shall be processed in accordance with the rights of data subjects under the Act.
- Appropriate technical and organisational measures shall be taken to prevent unauthorised or unlawful processing of data and against accidental loss or destruction of, or damage to data.
- Personal data shall not be transferred to a country outside the European Economic Area, unless that country ensures an adequate level of protection for the rights and freedom of individuals in relation to processing the data.

5.2 Freedom of Information (Scotland) Act 2002

As a public body, NHS Ayrshire and Arran may receive requests for CCTV images under the Freedom of Information (Scotland) Act 2002. If individuals are capable of being identified from CCTV images then the images can only be released if disclosing the information in question does not breach the data protection principles.

5.3 Health and Safety at Work Act 1974

NHS Ayrshire & Arran aims to comply with the legal requirements regarding the management of risk. The Health & Safety at Work etc Act 1974 Section 2(1), places a general duty on employers to “ensure so far as is reasonably practicable, the health and safety at work of their employees”. Section 3 of the Act extends this duty to others who are not our employees, but are affected by our acts or omissions.
5.4 **The Management of Health and Safety at Work Regulations 1999**

Regulation 3 places an absolute duty on employers to assess the risks to staff and others, and put systems in place to reduce significant risks.

5.5 **Risk Assessment**

Risk assessment may identify the need to install CCTV cameras as a measure to reduce risks to staff, patient or public safety. This will be determined by the level of residual risk after alternative control measures have been explored.

6.0 **Responsibilities**

6.1 All staff members have a responsibility to adhere to this policy at all times. The following post-holders have specific responsibilities in relation to the management of the system.

- **Director of Information and Clinical Support Services** – Responsible for ensuring that arrangements are in place to provide an effective, compliant CCTV system.

- **Information Governance Manager** – Maintain oversight of appropriate arrangements to ensure compliance with the Data Protection Act 1998 and Information Commissioner’s Office CCTV Code of Practice.

7.0 **Purposes of CCTV**

7.1 The operation of CCTV will apply to the following:

- Staff, patient and public safety and security.
- For the general purposes of the prevention of crime, investigation of crime and detection of offenders in or on NHS Ayrshire and Arran premises.
- For the investigation of serious or gross misconduct by employees (in accordance with the Management of Employee Conduct Policy).

8.0 **Operation and Control**

8.1 Cameras and equipment will only be installed and used in accordance with the purposes as stated in Section 7 above.

8.2 The CCTV system will be operated in accordance with the relevant operational procedures as listed within Section 13.
9.0 Administration

9.1 Processing, Storage, Retention and Disposal of images

9.1.1 Images are only to be processed for the stated purposes, stored in such a way to protect their integrity, held securely at all times and access restricted to only those with authorisation.

9.1.2 Processing must produce clear images that are suitable for the purposes for which they were intended.

9.1.3 Images will be held in all instances for a minimum period of 30 days. Beyond this period they will be held for a maximum period of time determined by the impact assessment and relevant operating procedures. When this period is elapsed they must be reused, removed or destroyed in a safe and secure manner as detailed in Section 16 of the NHS ‘Secure Storage, Communication and Transportation of Personal Information Policy’ for information on destruction process.

9.1.4 Records will be held and maintained of the following:

- Type of camera and equipment
- Camera locations
- Incidents
- Disposal of cameras and equipment
- Service level agreements
- Access and disclosure requests
- Impact assessments
- Risk assessments
- Maintenance logs
- Relevant authorised persons

9.2 Access to Images

9.2.1 Viewing and disclosure of images from the CCTV system must be controlled and consistent with the purposes for which the system was established.

9.2.2 Staff receiving a request for access to view images must follow the procedures set out for ‘Disclosure’, ‘Subject Access Requests’ under the Data Protection Act 1998 and similarly for Freedom of Information (Scotland) Act 2002 requests.

9.2.3 Access to CCTV images by the police will be processed in the same manner as other requests for personal data and in accordance with the guidance document CEL13 2008 ‘Information Sharing between NHS Scotland and the Police’ issued by the Scottish Government.

9.2.4 In accordance with CEL 13 2008, where requests for access to CCTV images from the Police are time critical, CCTV images should be released to assist the Police with their enquiries, Section 29 forms can be submitted retrospectively by the Police.
9.2.5 Copies of images to paper, video or digital format must be carried out to a standard suitable for the purpose required.

9.2.6 If copies are to be forwarded other than by hand then they must be transported in a manner consistent with the requirements of the NHS Ayrshire & Arran Policy, ‘Secure Storage, Communication and Transportation of Personal Information Policy.

10.0 Informing

10.1 Anyone entering a building or grounds where CCTV is in operation will be notified through the display of clear and prominent signs which will contain the following information:

- The name of the organisation
- The purposes of the CCTV
- Who to contact about the system

10.2 This policy will be published on the NHS Ayrshire and Arran website and knowledge portal.

11.0 Covert/Directed Surveillance

11.1 In some circumstances it may be necessary for NHS Ayrshire and Arran in the course of their duties to make observations of a person or persons in a covert manner. This will be conducted in compliance with HDL (2003) 30, Regulation of Investigatory Powers (Scotland) Act 2000.

11.2 The use of CCTV cameras as part of covert surveillance will only permissible in cases involving the following:

- Preventing or detecting crime or preventing disorder;
- Protecting public health; and
- In the interests of public safety.

11.3 In accordance with HDL (2003) 30, where cases involve potential criminal activity involving NHS Fraud and irregularities NHS Scotland Counter Fraud Services will authorise and conduct directed surveillance on behalf of NHS Ayrshire & Arran, where this is necessary and proportionate.

11.4 For criminal cases not involving fraud against the NHS, NHS Ayrshire & Arran will advise the public body with complementary power in the area of concern of the situation. Their trained investigators may then make use of covert surveillance authorised by their employing body where this is necessary and proportionate.
12.0 Complaints

12.1 Complaints regarding the operation of the CCTV system should be brought to the attention of ‘Patient Relations and Complaints’, Eglinton House, Ailsa Hospital.

13.0 Supporting Operating Procedures

13.0 This CCTV Policy will be supported by the following operating procedures:

- Out of Hours Guidance for On Call Managers and Directors
- Subject Access Requests for CCTV images
- Freedom of Information Access Requests for CCTV images.
- Impact Assessment Procedures for CCTV
- Guidance for Capital Planning Projects
- Installation of CCTV
- Maintenance of CCTV
- Staff Training to Support CCTV Policy and Procedures
- Retrieval of Images from CCTV Systems
- Use of CCTV for Real Time Monitoring of Images
- Siting of Cameras
- Guidance on Signage

**NOTE:** these procedures are being written at present and will be published as soon as possible. Any queries should be directed to the CCTV Impact Assessment Administrative Co-ordinator.

14.0 Related Policies and Documents

14.1 This policy should be read in conjunction with the following:

- Information Commissioner’s Office - CCTV Code of Practice, 2008
- Data Protection Act 1998
- Freedom of Information (Scotland) Act 2002
- The Regulation of Investigatory Powers (Scotland) Act 2000
- The Scottish Executive Covert Surveillance Code of Practice
- Management of Health and Safety at Work Regulations 1999
- CCTV Guidance Notes for NHS Scotland Organisations 2001
- Information Commissioner’s Office - Employment Practices Code
- CEL 13 2008 Information sharing between NHS Scotland and the Police
- NHS Ayrshire & Arran - Secure Storage, Communication & Transportation of Personal Information Policy
- NHS Ayrshire & Arran - Management of Violence & Aggression Procedure
- NHS Ayrshire & Arran - Lone Working Arrangement
- NHS Ayrshire & Arran – Management of Employee Conduct Policy
- NHS Ayrshire & Arran - Fraud Policy
15.0 General

15.1 When NHS Ayrshire and Arran staff members are employed on a site that is owned and controlled by another organisation, that organisation is responsible for the operation and control of any CCTV system in place. If there is a request for access to CCTV images at these sites then the request should be made directly to the particular organisation concerned. NHS Ayrshire and Arran would require any organisation in these circumstances to comply with the Information Commissioner’s Code of Conduct for CCTV to ensure compliance with the legislation.
Appendix 1   Equality & Diversity Impact Assessment

EQUALITY & DIVERSITY IMPACT ASSESSMENT

<table>
<thead>
<tr>
<th>Name of Policy</th>
<th>NHS Ayrshire &amp; Arran Closed Circuit TV Policy</th>
</tr>
</thead>
<tbody>
<tr>
<td>Name of Division</td>
<td>Information &amp; Clinical Support Services</td>
</tr>
<tr>
<td>Names and role of Review Team:</td>
<td>J Neilson, Information Governance Manager W Riddell, Information Governance Analyst Prof Craig White, Clinical and Care Systems Development Clinical Lead</td>
</tr>
<tr>
<td>Date(s) of assessment:</td>
<td>8th July 2008</td>
</tr>
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PART ONE: RAPID IMPACT ASSESSMENT (INITIAL SCREENING PROCESS)

SECTION ONE    AIMS OF THE PROGRAMME

1.1 Is this a new or existing Policy: New Policy

1.2 What is the aim or purpose of the Policy:

The purpose of this policy is to ensure that NHS Ayrshire and Arran complies with relevant legislation while also protecting and providing security to individuals, property and/or land which the organisation owns and controls. In order to assist in fulfilling its duty of care to provide protection and security for employees and others who use these properties the organisation has a Closed Circuit Television (CCTV) surveillance system in place at many of these locations.

1.3 Who is this policy intended to benefit or affect? In what way? Who are the stakeholders?

The policy is intended to benefit staff, contractors, patient and public – anyone working on or visiting NHS Ayrshire & Arran premises.

Benefits
- To ensure NHS Ayrshire & Arran CCTV System operates within the law.
- To ensure that the NHS Ayrshire & Arran CCTV system operates effectively and provides adequate protection and security for all persons on site and the premises.
- To ensure that CCTV images (personal information) containing staff, contractors, patients visitors etc are processed in accordance with the Data Protection Act 1998
Stakeholders
- NHS Ayrshire & Arran
- All staff
- Patients
- Public
- All visitors to NHS Ayrshire & Arran premises
- Police
- Partner organisations e.g. East, North and South Ayrshire Councils
- Organisations employed by NHS Ayrshire & Arran to provide and maintain premises

1.4 What outcomes are intended from this Policy
- Reduced risk of compliance breach
- Provision of effective and compliant CCTV System

1.5 How have these people been involved in the development of this policy?
Policy was formulated by group consisting of:
- Associate Clinical Director
- Information Governance Representatives
- Secretariat Manager
- Staff-side Representative
- Estates and Facilities Representatives
- O&HRD Representative
- Health & Safety Representatives
- Patient Services Representatives
- Finance Representative

1.6 What resource implications are linked to this policy
- Regular review to ensure compliance with relevant legislation
- Resources to ensure and maintain CCTV system which is adequate and effective
- Resources to undertake impact assessment of all NHS Ayrshire & Arran CCTV cameras
- Resources to deliver training to relevant staff on CCTV Policy and supporting operating procedures
### SECTION TWO | IMPACT ASSESSMENT

<table>
<thead>
<tr>
<th>Equality Target Groups</th>
<th>Positive impact</th>
<th>Adverse impact</th>
<th>Reason or comment for impact rating</th>
</tr>
</thead>
<tbody>
<tr>
<td>2.1 Women and Men</td>
<td>Positive</td>
<td></td>
<td>Aims to improve the security and confidentiality of CCTV images (personal information), aims to improve safety and security for all people visiting or working on NHS Ayrshire &amp; Arran premises.</td>
</tr>
<tr>
<td>2.2 Minority ethnic groups inc gypsy travellers, refugees &amp; asylum seekers</td>
<td>Positive</td>
<td></td>
<td>As above</td>
</tr>
<tr>
<td>2.3 Children &amp; Young people</td>
<td>Positive</td>
<td></td>
<td>As above</td>
</tr>
<tr>
<td>2.4 People with disabilities (physical or learning)</td>
<td>Positive</td>
<td></td>
<td>As above</td>
</tr>
<tr>
<td>2.5 Religious or faith groups</td>
<td>Positive</td>
<td></td>
<td>As above</td>
</tr>
<tr>
<td>2.6 Older people</td>
<td>Positive</td>
<td></td>
<td>As above</td>
</tr>
<tr>
<td>2.7 Homeless</td>
<td>Positive</td>
<td></td>
<td>As above</td>
</tr>
<tr>
<td>2.8 Looked after and accommodated: Children Adults Older People</td>
<td>Positive</td>
<td></td>
<td>As above</td>
</tr>
<tr>
<td>2.9 Lesbians</td>
<td>Positive</td>
<td></td>
<td>As above</td>
</tr>
</tbody>
</table>
### Appendix 1 - Equality and Diversity Impact Assessment

<table>
<thead>
<tr>
<th>2.10 Gay men</th>
<th>Positive</th>
<th>As above</th>
</tr>
</thead>
<tbody>
<tr>
<td>2.11 Bisexuals</td>
<td>Positive</td>
<td>As above</td>
</tr>
<tr>
<td>2.12 Transgender people</td>
<td>Positive</td>
<td>As above</td>
</tr>
<tr>
<td>2.13 People with language or social origin issues</td>
<td>Positive</td>
<td>As above</td>
</tr>
<tr>
<td>2.14 Individuals with Mental Health issues</td>
<td>Positive</td>
<td>As above</td>
</tr>
<tr>
<td>2.15 People in criminal justice system</td>
<td>Positive</td>
<td>As above</td>
</tr>
<tr>
<td>2.16 People in poverty</td>
<td>Positive</td>
<td>As above</td>
</tr>
<tr>
<td>2.17 Married and unmarried people/civil partnerships</td>
<td>Positive</td>
<td>As above</td>
</tr>
<tr>
<td>2.18 Staff</td>
<td>Positive</td>
<td>As above</td>
</tr>
</tbody>
</table>

### SECTION THREE CROSSCUTTING ISSUES

What impact will the proposal have on lifestyles? For example, will the changes affect:

<table>
<thead>
<tr>
<th></th>
<th>Positive impact</th>
<th>Adverse impact</th>
<th>Reason or comment for impact rating</th>
</tr>
</thead>
<tbody>
<tr>
<td>3.1 Diet and nutrition?</td>
<td></td>
<td>N/A</td>
<td></td>
</tr>
<tr>
<td>3.2 Exercise and physical activity?</td>
<td></td>
<td>N/A</td>
<td></td>
</tr>
<tr>
<td>3.3 Substance use: tobacco, alcohol or drugs?</td>
<td></td>
<td>N/A</td>
<td></td>
</tr>
</tbody>
</table>
### Appendix 1 - Equality and Diversity Impact Assessment

<table>
<thead>
<tr>
<th>3.4 Risk taking behaviour?</th>
<th>N/A</th>
</tr>
</thead>
<tbody>
<tr>
<td>3.5 Education and learning, or skills?</td>
<td>N/A</td>
</tr>
<tr>
<td>3.6 Other</td>
<td>N/A</td>
</tr>
</tbody>
</table>

### SECTION FOUR CROSSCUTTING ISSUES:

Does your Programme consider the impact on the social environment? Things that might be affected include:

<table>
<thead>
<tr>
<th>Positive impact</th>
<th>Adverse impact</th>
<th>Reason or comment for impact rating</th>
</tr>
</thead>
<tbody>
<tr>
<td>4.1 Social status</td>
<td></td>
<td>N/A</td>
</tr>
<tr>
<td>4.2 Employment (paid or unpaid)</td>
<td></td>
<td>N/A</td>
</tr>
<tr>
<td>4.3 Social/family support</td>
<td></td>
<td>N/A</td>
</tr>
<tr>
<td>4.4 Stress</td>
<td></td>
<td>N/A</td>
</tr>
<tr>
<td>4.5 Income</td>
<td></td>
<td>N/A</td>
</tr>
</tbody>
</table>

### SECTION FIVE CROSSCUTTING ISSUES

Will the proposal have an impact on the physical environment? For example, will there be impacts on:

<table>
<thead>
<tr>
<th>Positive impact</th>
<th>Adverse impact</th>
<th>Reason or comment for impact rating</th>
</tr>
</thead>
<tbody>
<tr>
<td>5.1 Living conditions?</td>
<td>YES</td>
<td>Provision of adequate, compliant and effective CCTV system will improve safety and security on NHS Ayrshire &amp; Arran premises.</td>
</tr>
<tr>
<td>5.2 Working conditions?</td>
<td>YES</td>
<td>Provision of adequate, compliant and effective CCTV system will improve safety and security on NHS Ayrshire &amp; Arran premises.</td>
</tr>
<tr>
<td>5.3 Pollution or climate change?</td>
<td></td>
<td>N/A</td>
</tr>
<tr>
<td>---------------------------------</td>
<td>------------------</td>
<td>------</td>
</tr>
<tr>
<td>5.4 Accidental injuries or public safety?</td>
<td>YES</td>
<td>Provision of adequate, compliant and effective CCTV system will improve safety and security on NHS Ayrshire &amp; Arran premises.</td>
</tr>
<tr>
<td>5.5 Transmission of infectious disease?</td>
<td></td>
<td>N/A</td>
</tr>
<tr>
<td>5.6 Other</td>
<td></td>
<td>N/A</td>
</tr>
</tbody>
</table>

**Will the Programme have any impact on...**

<table>
<thead>
<tr>
<th>Discrimination?</th>
<th></th>
<th>N/A</th>
</tr>
</thead>
<tbody>
<tr>
<td>Equality of opportunity?</td>
<td></td>
<td>N/A</td>
</tr>
<tr>
<td>Relations between groups?</td>
<td></td>
<td>N/A</td>
</tr>
<tr>
<td>Other</td>
<td></td>
<td>N/A</td>
</tr>
</tbody>
</table>

**Will the proposal affect access to and experience of services? For example:**

<table>
<thead>
<tr>
<th>Positive impact</th>
<th>Adverse impact</th>
<th>Reason or comment for impact rating</th>
</tr>
</thead>
<tbody>
<tr>
<td>Health care</td>
<td>Yes</td>
<td>People accessing health care services will feel more confident about their security when on NHS sites. CCTV is privacy intrusive; adoption of a robust CCTV policy will ensure that this intrusion is proportionate to the problems CCTV is designed to address.</td>
</tr>
<tr>
<td>Social Services</td>
<td></td>
<td>N/A</td>
</tr>
</tbody>
</table>

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### PART TWO

#### SECTION SIX  
**EXAMINATION OF AVAILABLE DATA AND CONSULTATION**

Data could include: consultations, surveys, databases, focus groups, in-depth interviews, pilot projects, reviews of complaints made, user feedback, academic or professional publications, reports etc.

Name any experts or relevant groups / bodies you should approach (or have approached) to explore their views on the issues.

- Information Commissioners Office – Data Protection CCTV Code of Conduct
- Secured by Design
- NHS Central Legal Office

What do we know from existing in-house quantitative and qualitative data, research, consultations, focus groups and analysis?

Policy development group consisted of Information Governance, Clinical Representation, Staff side representation

What do we know from existing external quantitative and qualitative data, research, consultations, focus groups and analysis?

What gaps in knowledge are there?

In relation to the groups identified:

What are the potential impacts on health?

**Will the Programme impact on access to health care? If yes - in what way?**  
No

**Will the Programme impact on the experience of health care? If yes - in what way?**

Improve security and safety for patients and visitors to NHS Ayrshire & Arran premises. Ensure security and confidentiality of CCTV images (personal information) containing patients and visitors.
### SECTION SEVEN  HAVE ANY POTENTIAL NEGATIVE IMPACTS BEEN IDENTIFIED?

If so, what action been proposed to counteract these? Negative impacts (if yes, state how) e.g.
- Is there any unlawful discrimination?
- Could any community get an adverse outcome?
- Could any group be excluded from the benefits of the Programme/function?
- Does it reinforce negative stereotypes?

**POSITIVE IMPACT**
Policy aims to improve the security and confidentiality of CCTV images (personal information) processed by NHS Ayrshire & Arran, for all persons visiting or working on NHS Ayrshire & Arran premises.

### SECTION EIGHT  MONITORING

**How will the outcomes be monitored?**
Audit by Information Governance

**What monitoring arrangements are in place?**
Access to and disclosure of CCTV images currently monitoring by Information Governance

**Who will monitor?**
Information Governance & Estates Department

**What criteria will you use to measure progress towards the outcomes?**
Completion of CCTV Impact Assessments Review of CCTV disclosure log

Recommendations (This should include any action required to address negative impacts identified)

### SECTION NINE  FOR NEW POLICIES ONLY

**What research or consultation has been done?**
3 month consultation – all staff invited to comment on policy

**What stage is the Programme at?**
Due for submission to Area Partnership Forum, Impact assessments will commence when candidate in post
What is the target date for completion?

Is a more detailed assessment needed? (It is not necessary to subject all proposals to a detailed assessment.) If so, for what reason?
No

COMPLETED PROGRAMME

Who will sign this off?    Area Partnership Forum

When?    27th October 2008

PUBLICATION

How will this be published?
Copy given to Equality & Diversity Officer

Carried Out by  
Signature  
Date

Authorised by    Title
Signature  
Date