

## 023 THE IMT MEDICAL TRANSPORT LIMITED

### ENVIRONMENTAL POLICY (V4)

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Date: Reviewed: APRIL AND OCTOBER ANNUALLY  
Policy Authorisation: IMT Medical Board

**POLICY STATEMENT:** At IMT Medical, we are committed to promoting equality and diversity across and in all aspects of our business. We aspire to promote a diverse, inclusive and representative working environment in which everyone is treated with dignity and respect. Our aim is to support our staff and to promote with our clients, to achieve progress towards a truly diverse workforce. We operate inclusive, open-minded, non-discriminatory practices. We will work with all sections of the community to ensure that there is neither discouragement nor discrimination against anyone. As an employer we are committed to equality and diversity in all of our practices and we recognise that groups and individuals will not be discriminated against on the basis of age, gender, ethnic origin, race, nationality, colour of skin, sexuality, impairment (physical, sensory or learning), physical appearance, marital or another life status, religious or political belief and other differences that cannot be justified.

**POLICY PURPOSE:** The purpose of this Policy is to set out IMT Medical Transport Limited's commitment and to define our approach to environmental management by ensuring full compliance with UK / EU legislation and current best practice guidance. The Policy will ensure IMT Medical Transport actively encourages all staff and suppliers to participate in and contribute towards achieving our objectives. We will take seriously our commitment to work to the standards as set out in documentation / accreditations such as ISO 14001 and we will ensure that all matters covered within our version are adhered to.

This Policy should be read in conjunction with:

**078 - IMT MEDICAL TRANSPORT LIMITED – CSR POLICY.**  
**033 – IMT MEDICAL TRANSPORT LIMITED – ENVIRONMENTAL COMPLAINTS POLICY.**



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IMT Medical Transport Limited a company registered in England under registration number 10713061

## Version Control

### Document Location.

The latest version of this document can be found with the HR department or on-line in our website staff page.

### Document Usage.

If using a printed version of this document ensure it is the latest published version.

VERSION	DATE	AUTHOR/S	REASON	REMARKS
1.0	17 October 2017	John Hood	NEWCO Establishment	
2.0	12 April 2018	John Hood	Policy Review	
3.0	18 October 2019	John Hood	Policy Review	ISO Audit and Supplier changes
4.0	23 April 2019	John Hood	Policy Review	ISO Audit prep
5.0				
6.0				

### Quick Reference Guide

For quick reference, this page summarises the actions required by this policy. This does not negate the need to be aware of and to follow the further detail provided in this policy.

IMT Medical staff and those working or training under other arrangements are expected to:

1. Understand our equality objectives (i) better health outcomes for all; (ii) improved client and patient experience; (iii) empower, engage and support staff; (iv) inclusive leadership at all levels.
2. This policy gives a comprehensive guide on the responsibilities set by IMT Medical Transport Limited in setting out to achieve environmental sustainability across all areas of our operations and workforce. It reflects the need for IMT Medical to deliver the statutory and mandatory elements of corporate and environmental sustainability and the Company's Values in this area in a more documented format.
3. It details IMT Medical's accountability and responsibilities along with the processes and requirements needed to undertake this.
4. It provides strategic objectives and best practice guidance.
5. The policy gives further guidance to staff and suppliers on the support levels provided to apply this Policy across our business and to promote it to others.
6. Its provides guidance on staff taking responsibility for their own actions in this sensitive area of operation.

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## 1.0 Introduction and Purpose.

1.1. IMT Medical is proud of our work and commitment to undertake the ISO 14001 accreditation. This Policy reflects our approach to environmental issues by setting out our vision for ethical and sustainable environmental management.

1.2 The policy and the sustainable development management plan put together as part of our ISO 14001 framework, will together define IMT Medical's approach to environmental management by ensuring full compliance with UK legislation and current best practice guidance.

1.3 IMT Medical will work closely with regulatory authorities, the local healthcare community, staff, patients, suppliers and contractors to ensure it minimises the environmental impact of providing services within many areas of medical transport whilst obtaining best value for money.

1.4 The policy places responsibility on all staff and suppliers to consider environmental, social and economic issues when making both short and long term decisions.

## 2.0 Policy Principles.

2.1 Implementing environmentally sustainable policies within IMT Medical requires the support of staff, our suppliers and clients. In order to meet the aims of this policy, staff, suppliers and clients need to be aware of what actions are being taken, and how they may contribute to achieving the objectives of this policy.

2.2 IMT Medical accepts that its operational activity will inevitably result in adverse effects on the environment, but also recognises that opportunities exist to minimise its impact on the environment.

2.3 IMT Medical will review its procedures to improve its environmental practices and ensure statutory compliance.

2.4 Where practicable, IMT Medical will act beyond legal compliance to achieve environmental best practice within our sector.

## 3.0 Organisational Accountability and Responsibilities.

3.1 This policy applies to all directly and indirectly employed staff within IMT Medical. The policy is also recommended to our Suppliers as good practice and it will be a pre-requisite of Suppliers supporting us that they adopt our Policy and standards across areas of environmental standards and compliance. This policy will become embedded in all activities of the Company and should be read in conjunction with our CSR policy. The expansive and long-term nature of the sustainability agenda means that the implementation of the policy will be an incremental process, which will also align to regulatory and legal requirements along with Key performance Indicators set by our clients.

3.2 The Managing Director has overall responsibility for ensuring compliance with statutory regulations, guidance and good environmental related matters along with all environmental and sustainability within IMT Medical. The MD will ensure IMT Medical has processes and systems in place to ensure implementation of the policy to support the ISO accreditation platforms and frameworks and to manage actions on energy and carbon management, procurement, low carbon travel and transport (including access for contracted clients), water, waste, building design (including our internal fittings).

3.3 The Company Board will ensure that environmental activity becomes integrated into all of IMT Medical's business activities and support and promote the policy throughout the Company.

3.4 Our corporate compliance team will support and be responsible for all areas of environmental practice and will help lead on sustainability in carbon reduction.

3.5 All Manager and Team Leaders should make staff aware of the policy and their contribution to sustainable issues and support actions on energy and carbon management, procurement, low carbon travel and transport (including access for contracted clients), water, waste, building design (including our internal fittings). Managers and team leaders have responsibility for implementing IMT Medical's Environmental Policy and procedures within their sphere of responsibility. Managers and Team leaders will drive forward IMT Medical's environmental performance in accordance with this policy and our ISO 14001 accreditation. Along with the MD and corporate compliance team, Managers and Team Leaders will:

- Meet the requirements of relevant legislation and best practice guidance.
- Have responsibility for monitoring overall progress against the SDMP.
- Standardise operational practices across IMT Medical and with our suppliers.
- Introduce training in particular awareness campaigns to reduce energy use and waste production.
- Standardise equipment and consumables procured by IMT Medical.
- Adopt guiding principles - "Saving Carbon, Improving Health".
- Work with IMT Medical's clients, partners and suppliers to promote best practice and aid the implementation of sustainable development objectives.

3.6 All staff and suppliers have a responsibility to protect the environment and deliver and help improve our objectives. Staff and suppliers have a responsibility to consider the environmental, social and economic issues when making both short and long term decisions.

#### 4.0 Training.

4.1 The corporate compliance management team will provide training for staff, partners and Suppliers especially in terms of knowledge of sustainability, climate change and carbon literacy.

4.2 An active communications initiative will be pursued to engage all staff, patients, visitors and others who visit or use our facilities. This will include our website and flyers.

#### 5.0 Scope of Policy.

5.1 IMT Medical recognises that in delivering healthcare / medical transport and services, our sites may have adverse impacts on the environment and it is essential that these are minimised and maintained as such through continuous monitoring. IMT Medical is committed to preventing pollution and reducing the environmental impact of its activities and where reasonably practicable will comply with all relevant environmental legislation. To this end IMT Medical will carry out a detailed assessment of its activities and develop a set of objectives and targets to manage the aspects associated with those activities as aligned within the standards of ISO 14001's framework. IMT Medical will follow that framework, and our plan will deliver continuous improvements within budgetary management. These objectives and targets will be reviewed annually to ensure their effectiveness.

5.2 The Company will do all that is reasonably practicable and considers it essential that all staff should work together positively to enable the Company to comply with Statutory Regulations relating to the provision of medical training and medical transport services and other guidance relating to environmental sustainability.

5.3 The policy covers all aspects of environmental management related activity within IMT Medical.

5.4 The policy covers all staff employed by IMT Medical.

5.5 This policy relates to the management of suppliers, contractors and sub-contractors who perform work on behalf of IMT Medical or supply goods and services to us.

5.6 A degree of ownership of this document is needed, so that it is not seen as a dictum from management, but as a corporate mission to which all staff and suppliers to IMT Medical can contribute and from which all can ultimately benefit.

## 6.0 Strategic Objectives.

6.1 IMT Medical is committed to continuous improvement in minimising the impact of its activities on the environment.

6.2 The objectives of the policy are to:

- Comply with relevant legislation, and develop a structured and systematic approach to the management of the environment.
- Support where we can any environmental reductions and targets and act within our Environmental Aspects Register.
- Establish baselines for relevant activities and set measurable objectives and targets using systems where available to take action on energy and carbon management, procurement, low carbon travel and transport (including access for contracted clients), water, waste, building design (including our internal fittings), governance and finance.
- Establish a carbon/sustainability weighting to all investment and procurement options where possible and in particular when procuring vehicles.
- Help to preserve natural resources by supporting policies and strategies to:
  - Reduce the unnecessary and wasteful use of energy and water.
  - Make more economical and effective use of products such as paper, glass, plastic, cans, batteries and other similar products.
  - Develop strategies and controls to protect the environment including discharges to drains, emissions to atmosphere and land management.
  - Promote employee enthusiasm and employee self-responsibility to ensure environmental improvements.
  - Implement and promote recycling.
  - Encourage staff to promote their health and wellbeing, whilst reducing their carbon footprint through the implementation of a travel plan to include walking, cycling, use of public transport, car sharing initiatives and home working.
- Work with suppliers, partners and local authorities in developing whole community solutions to carbon emissions.

7.0 Policies. The following areas highlight IMT Medical's key sustainability policies that will help to embed sustainability into all our procedures.

### 7.1 Energy, Carbon and Water Management Policy.

Sustainable development, in particular energy carbon reduction, has become an increasingly important national priority, with the UK committed to reducing carbon by 80% by 2050. IMT Medical have commenced this journey towards reduction by simple implementations such as:

- Light sensors and timers in our premises.
- Working with our Landlord to install new cooling / heating systems, which are more efficient.
- Purchasing of vehicles with lower emissions.

These type of initiatives will support the NHS reduction strategy along with our own frameworks in that

reducing the carbon impact promotes the sustainability and resilience of our business and the healthcare system by:

- Helping to comply with forthcoming legislation and financial incentives.
- Keeping costs down by reducing the demand for, and increasing the efficiency of, energy use.
- Increasing our resilience against unpredictable energy supply and prices.
- Advertising our sustainability credentials as a private sector exemplar.
- Help to mitigate the negative health consequences of climate change.

***'IMT Medical is committed to the responsible use of its energy and water across all of its operations. The policy will not only meet legal requirements and approved codes of practice, but strive to ensure that IMT Medical is at the leading edge of good practice. This policy provides a framework for setting and reviewing energy objectives and targets.'***

The policy of IMT Medical is to control energy, carbon and water consumption in order to:

- Avoid unnecessary expenditure on utilities.
- Improve cost-effectiveness, productivity and working condition.
- Reduce our carbon emissions from energy in line with national, sector-wide and institutional targets.
- Protect the environment.
- Meet legal requirements.

In order to meet the above criteria, we are committed to a number of objectives:

- Continually improve energy performance through reducing our energy and water consumption and associated emissions in line with the figures set out in our Carbon Management Plan.
- Meet, and where appropriate exceed, legal and other requirements, and strive to meet indicators and best practice requirements in respect of our emissions.
- Utilise energy and water from sustainable sources where practicable, including incorporation of renewable and low carbon technologies into building development projects. ***This will have to be in discussion with our Landlords (Huyton Council) as they control the site energy suppliers.***
- Raise awareness amongst staff and suppliers of the important contribution each member can make to energy and water conservation.
- Ensure that commitment is obtained from staff at all levels within IMT Medical on aspects of energy and water efficiency under their control.

IMT Medical is committed to ensure the availability of information and necessary resources to achieve these objectives and targets.

## 7.2 Environment and Sustainability Policy.

This policy will inspire us to meet, support, influence and raise awareness to reflect latest environmental practice. This will be through the implementation of an environmental management system under our ISO 14001 framework in pursuit of sustainability and continual improvement. IMT Medical will seek

innovative ways of meeting environmental objectives.

Commitments include:

- To fulfill all compliance obligations within our ISO accreditation including the relevant UK, European and international legislative and regulatory guidelines, and strive to meet indicators and best practice requirements in respect of sustainability.
- To support continual improvement of the ISO environmental management system and framework to enhance environmental performance. This will be achieved by establishing demanding and measurable environmental performance targets, specially related to energy, transport and waste, which are reviewed regularly and reported upon at least annually.
- Raising awareness within the IMT Medical community (which will include suppliers) to ensure that everyone recognises and respects their environmental and ethical responsibilities and acts accordingly.
- Implement ethically and environmentally responsible procurement and financial management measures, policies and procedures and communicate these to suppliers and our clients.
- To protect the environment by preventing all kinds of pollution through reduced waste, reduced emissions and responsible disposal.
- Embed sustainability into the culture of IMT Medical.
- Develop and maintain the estate and associated landscape with due regard to environmental impact and social value in support of our Landlords.

### 7.3 Purchasing and Sustainable Procurement (Buildings, vehicles, design etc.) Policy

IMT Medical will implement ethically and environmentally responsible purchasing and procurement of our resources.

The sustainable procurement must, where possible, support this statement and provide guidelines and objectives for achieving a sustainable procurement procedure that is embedded in our culture. It is recognised that our purchasing decisions have a large impact outside of IMT Medical and this policy aims to minimise any negative environmental and social impacts; to this end we will:

- Comply with, and where possible exceed, relevant legislation.
- In the first instance, reduce the demand for goods and services by minimising waste and focusing on the re-use and recycling of existing goods that meet our contractual and KPI requirements.
- Review environmental risks and target high-risk contracts and high-expenditure commodities.
- Consider 'whole life' costs and impacts when assessing equipment for purchase.
- Make purchasing decisions based not only on economic factors, but also social and environmental factors where possible.
- Purchase and/or prioritise those items that are manufactured with a high-recycled content.
- Include relevant sustainability criteria within all tender exercises and supplier appraisals, where legally appropriate.

Engage with our Suppliers to:

- Promote awareness, encourage suppliers to adopt similar policies and sustainable approaches in



their supply chains, remove barriers to entry for our suppliers and local suppliers, encourage development and promotion of new sustainable products, services and initiatives if possible within our operations.

- Raise internal awareness of sustainability issues through the promotion and communication of relevant goods and information.

#### 7.4 Waste Management Policy.

IMT Medical provides an exemplar statement of how we intend our Managers, staff and Suppliers to manage the safe operation of waste systems within our properties or across our contracted areas of responsibility. We will also consequently discharge our duty in law as far as is reasonably practicable and will strive to protect the environment by preventing all kinds of pollution through reduced waste, reduced emissions and responsible disposal.

Our objective will be to reduce overall waste production and improve on recycling rates.

The Company will achieve this by:

- Reviewing our purchasing practices with a view to minimising waste.
- Advising staff on the waste hierarchy (reduce, reuse, recycle) and providing guidance on waste reduction techniques and reuse/recycling facilities.
- Providing adequate recycling facilities around the offices and the ambulance station.
- Ensuring that waste is stored appropriately, safely and in line with legislation.
- Ensuring that waste is disposed of responsibly and in line with legislation.
- Working with our Landlords to ensure this policy is implemented across the estate if possible.

#### 7.5 Biodiversity Policy.

Our Biodiversity Policy highlights our commitment to limit IMT Medical's negative impacts on biodiversity on site at all of our locations and where possible in the locality, to preserve, and where possible, enhance the biodiversity (habitats and species) of the estates we occupy.

IMT Medical will achieve this by upholding the following objectives:

- Raise awareness amongst staff and suppliers of the importance of biodiversity on site through displays and where possible by promoting activities.
- Support any local Groups or our Landlords to record and protect species on the estates we occupy.
- Incorporate the principles of conservation into estate planning and management, preserving and enhancing existing habitats where possible.
- Support opportunities to conserve and create new biodiversity habitats.
- Work with new and existing partners to sustain and enhance biodiversity on our Landlords estates and within the community.
- Ensure sympathetic management techniques are used to avoid disturbance to wildlife.

## 7.6 Sustainable Food Policy.

Although a very small area of our business (through supporting NORS teams or Patients), IMT Medical is committed to integrating sustainability into all aspects of food to staff, visitors, and suppliers where practicable. We recognise our responsibility to carry out our procurement activities in an environmentally and socially responsible manner and to incorporate environmental and social considerations into our service and procurement selection processes.

We also aspire to improve the health of our staff, visitors and suppliers by increasing choice and access to fresh healthy food, as well as providing relevant information to enable them to make informed choices. We will support the way we purchase consumables.

## 7.7 Low carbon Travel and Transport Policy.

Our aim is to be environmentally conscious when planning travel, be it when we are delivering medical transport services, travelling to and from places of work and including client visits to our sites. We promote this by using public transport services where possible, and alternative means of conducting visits and meetings by using Video Conferencing or Skype.

We aim to be environmentally conscious when planning travel in support of our services by using planning routes, which support other areas of Policy such as reductions in fuels.

## 7.8 Sustainable Finance Policy.

Sustainable finance is the provision of finance to investments taking into account environmental, social and governance considerations. Sustainable finance includes a strong green finance component that aims to support economic growth while reducing pressures on the environment. At IMT Medical, we must make major considerations across this area and ensure compliance or change without compromise of services to our clients.

In addition to environment pressure, IMT Medical must ensure that we mitigate financial and corporate risks through appropriate governance.

## 8.0 Continuous Improvement.

8.1 To ensure that IMT Medical remains current and looks to promote best practice at all times, we will continuously seek further improvement where possible. This will include matters such as:

- Periodically reviewing our environmental policy and practices in order to improve operation and environmental performance.
- Learning from best practice examples of environmental management.
- Integrating environmental awareness in planning, marketing, employee communications and training.
- Continuous monitoring.

8.2 Fostering responsible environmental behaviour amongst our employees and Suppliers at all levels and encouraging them to continuously improve and aim beyond minimum our requirements.

## Appendix 1 - List of main Statutory Framework UK/EU legislation

The main areas of UK/EU legislation which encompass environmental issues are:

- Air Quality Standards Regulations SI 2010/1001
- Anti-Pollution Works Regulations SI 1999/1006
- Anti-social Behaviour Act 2003 Chapter 38
- Anti-social Behaviour, Crime and Policing Act 2014 Chapter 12
- Biocidal Products and Chemicals (Appointment of Authorities and Enforcement) Regulations SI 2013/1506
- Building Regulations SI 2010/2214
- Carriage of Dangerous Goods and Use of Transportable Pressure Equipment Regulations SI 2009/1348
- Classification, Labelling and Packaging of Chemicals (Amendments to Secondary Legislation) Regulations SI 2015/21
- Clean Air Act 1993 Chapter 11
- Clean Neighbourhoods and Environment Act 2005 Chapter 16
- Climate Change Act 2008 Chapter 27
- Climate Change Levy (Registration and Miscellaneous Provisions) Regulations SI 2001/7
- Conservation of Habitats and Species Regulations SI 2010/490
- Contaminated Land (England) Regulations SI 2006/1380
- Control of Asbestos Regulations SI 2012/632
- Control of Noise (Code of Practice for Construction and Open Sites) (England) Order SI 2015/227
- Control of Pesticides Regulations SI 1986/1510
- Control of Pollution (Oil Storage) (England) Regulations SI 2001/2954
- Control of Pollution Act 1974 Chapter 40
- Control of Substances Hazardous to Health Regulations SI 2002/2677
- Controlled Waste (England and Wales) Regulations SI 2012/811
- Countryside and Rights of Way Act 2000 Chapter 37
- CRC Energy Efficiency Scheme Order SI 2013/1119
- Eco-design for Energy-Related Products Regulations SI 2010/2617
- Energy Information Regulations SI 2011/1524
- Energy Performance of Buildings (England and Wales) Regulations SI 2012/3118
- Environment Act 1995 Chapter 25
- Environmental Civil Sanctions (England) Order SI 2010/1157
- Environmental Damage (Prevention and Remediation) (England) Regulations SI 2015/810
- Environmental Noise (England) Regulations SI 2006/2238
- Environmental Permitting (England and Wales) Regulations SI 2010/675
- Environmental Protection Act 1990 Chapter 43
- Flood and Water Management Act 2010 Chapter 29
- Greenhouse Gas Emissions Trading Scheme Regulations SI 2012/3038
- Hazardous Waste (England and Wales) Regulations SI 2005/894
- Ionising Radiations Regulations SI 1999/3232
- Natural Environment and Rural Communities Act 2006 Chapter 16
- Noise and Statutory Nuisance Act 1993 Chapter 40
- Ozone-Depleting Substances Regulations SI 2015/168
- Persistent Organic Pollutants Regulations SI 2007/3106
- Planning (Hazardous Substances) Act 1990 Chapter 10
- Radioactive Contaminated Land (Modification of Enactments) (England) Regulations SI 2006/1379
- Radioactive Substances Act 1993 Chapter 12
- Renewable Transport Fuel Obligations Order SI 2007/3072
- Urban Waste Water Treatment (England and Wales) Regulations SI 1994/2841
- Volatile Organic Compounds in Paints, Varnishes and Vehicle Refinishing Products Regulations SI 2012/1715
- Waste (England and Wales) Regulations SI 2011/988
- Waste Batteries and Accumulators Regulations SI 2009/890
- Waste Electrical and Electronic Equipment Regulations SI 2013/3113
- Water Act 2003 Chapter 37
- Water Industry Act 1991 Chapter 56

## Appendix 2: Equality Impact Assessment Tool

<b>Policy Title:</b> ENVIRONMENTAL POLICY V4	<b>Human Resources</b>
<b>Name of person/s auditing/developing/authoring:</b> John Hood	
<b>Aims/Objectives of policy/service:</b> The overall aim is to provide a consistent, fair and equitable approach whilst supporting the Company in achieving its goals.	

### 1. Check for DIRECT discrimination against any group of SERVICE USERS:

Question: Does our policy/service contain any statements/functions which may exclude people from using the services who otherwise meet the criteria under the grounds of:	Response		Action required		Resource implication	
	Yes	No	Yes	No	Yes	No
1.1 Age?		✓		✓		✓
1.2 Gender (Male, Female and Transsexual)?		✓		✓		✓
1.3 Disability?		✓		✓		✓
1.4 Race or Ethnicity?		✓		✓		✓
1.5 Religious, Spiritual belief (including other belief)?		✓		✓		✓
1.6 Sexual Orientation?		✓		✓		✓
1.7 Human Rights: Freedom of Information/Data Protection		✓		✓		✓

If yes is answered to any of the above items the policy/service may be considered discriminatory and requires review and further work to ensure compliance with legislation.

### 2. Check for INDIRECT discrimination against any group of SERVICE USERS:

Question: Does our policy/service contain any statements/functions which may exclude employees from operating the under the grounds of:	Response		Action required		Resource implication	
	Yes	No	Yes	No	Yes	No
2.1 Age?		✓		✓		✓
2.2 Gender (Male, Female and Transsexual)?		✓		✓		✓
2.3 Disability?		✓		✓		✓
2.4 Race or Ethnicity?		✓		✓		✓
2.5 Religious, Spiritual belief (including other belief)?		✓		✓		✓
2.6 Sexual Orientation?		✓		✓		✓
2.7 Human Rights: Freedom of Information/Data Protection		✓		✓		✓

If yes is answered to any of the above items the policy/service may be considered discriminatory and requires review and further work to ensure compliance with legislation.

**TOTAL NUMBER OF ITEMS ANSWERED 'YES' INDICATING DIRECT DISCRIMINATION = 0**

### 3. Check for DIRECT discrimination against any group relating to EMPLOYEES:

Question: Does our policy/service contain any	Response	Action required	Resource implication
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conditions or requirements which are applied equally to everyone, but disadvantage particular persons' because they cannot comply due to:		Yes	No	Yes	No	Yes	No
3.1	Age?		✓		✓		✓
3.2	Gender (Male, Female and Transsexual)?		✓		✓		✓
3.3	Disability?		✓		✓		✓
3.4	Race or Ethnicity?		✓		✓		✓
3.5	Religious, Spiritual belief (including other belief)?		✓		✓		✓
3.6	Sexual Orientation?		✓		✓		✓
3.7	Human Rights: Freedom of Information/Data Protection		✓		✓		✓

If yes is answered to any of the above items the policy/service may be considered discriminatory and requires review and further work to ensure compliance with legislation.

**4. Check for INDIRECT discrimination against any group relating to EMPLOYEES:**

Question: Does our policy/service contain any statements which may exclude employees from operating under the grounds of:	Response		Action required		Resource implication		
	Yes	No	Yes	No	Yes	No	
4.1	Age?		✓		✓		✓
4.2	Gender (Male, Female and Transsexual)?		✓		✓		✓
4.3	Disability?		✓		✓		✓
4.4	Race or Ethnicity?		✓		✓		✓
4.5	Religious, Spiritual belief (including other belief)?		✓		✓		✓
4.6	Sexual Orientation?		✓		✓		✓
4.7	Human Rights: Freedom of Information/Data Protection		✓		✓		✓

If yes is answered to any of the above items the policy/service may be considered discriminatory and requires review and further work to ensure compliance with legislation.

**TOTAL NUMBER OF ITEMS ANSWERED 'YES' INDICATING INDIRECT DISCRIMINATION = 0**

Signature of auditor: *John Hood*

Original date of signing: 17 October 2017