

BRISTOL CITY COUNCIL

HUMAN RESOURCES COMMITTEE

1 June 2012

For Resolution

Report of: Strategic Director, Health & Social Care

Title: Review of Market Supplement Payment to Forensic Social Workers

Officer Presenting Report: Richard Prior - Forensic Liaison Manager & Social Care Lead

Contact Telephone Number: 0117 378 4141

RECOMMENDATION

The Committee is asked: -

- (1) To approve the continuation of a market supplement of £1787.00pa (pro rata) for the period 1st July 2012 to 30th June 2015 to be paid to the Social Workers in the Forensic Services team.

Summary

This report reviews an existing market supplement payment made to Forensic Social Workers under the provision of the Pay Policy Section 5.5 concerning 'Hard to fill posts' as an aid to recruiting and retaining suitably qualified and experienced staff.

These posts continue to be hard to fill as is well evidenced over the years and recently in this current financial climate. Retention of this highly skilled and experienced team is also of concern and the current possibility of its removal has already resulted in a significant threat to the team and overall service. There has historically been a high turnover of staff.

The last attempt to recruit was particularly disappointing in spite of the

current financial climate (September 2011). There was just one candidate with some appropriate experience but they withdrew when offered a post in another Medium Secure Unit that was considerably better remunerated in a different region. Only one other candidate was appointable at interview but had never even worked in a mental health team.

In addition, evidence gathered (whilst variable) shows considerably higher salaries for similar jobs elsewhere in the region and nationally, and market supplements and allowances in relation to this specialised role are summarised in the Appendices.

There is a risk that removal of the market supplement is likely to result in retention difficulties and cause subsequent recruitment difficulties that the service has consistently experienced over the past three years.

The significant issues in the report are:

1. There is a need to retain the specialist staff who have the skills and experience to work in the very challenging environment of a medium secure unit for serious offenders with mental health needs.
2. This service provides a region wide service covering Bristol, Wiltshire, Gloucestershire, Somerset; the Women's Service also covers Devon Cornwall and the Scilly Isles.
3. Bristol City Council hosts these posts although they are funded by the South of England Specialist Commissioning Group (SoESCG) and will come under the National Commissioning Board. The Forensic Social Workers are essential to Avon and Wiltshire Mental Health Partnership NHS Trust (AWP)
4. AWP supports and recommends the continuance of this supplement in order to maintain the service provided and the SoESCG supports AWP in how this service is provided.
5. The previous recruitment process failed to recruit into the post. This leaves employees very vulnerable when they are working in what is already a highly challenging environment. It also has an impact on service users and could delay discharge.
6. Historically it has been difficult to recruit and retain experienced/qualified staff into these specialist posts and there is no reason to believe that this will change based on the current evidence.
7. There are few Forensic Social Work posts nationally so data comparison

is limited.

1. Policy

The payment of market supplements (is approved as an addition to the grade/salary of posts, as determined by the Council's job evaluation scheme) is provided for by the Pay Policy, Section 5.5 'Hard to Fill Posts - Market Supplements' (Appendix A).

2. Consultation

2.1 Internal

The views of the Strategic Director and Service Manager, H&SC have been sought, and consultation has also taken place with the Head of Mental Health Services for BCC, the Forensic Liaison Manager & Social Care Lead and, Avon and Wiltshire Mental Health Partnership NHS Trust (AWP) Service Manager responsible for forensic social work.

2.2 External

Whilst external consultation has not taken place (other than with AWP) it should be noted that NHS organisations and local authorities across the UK providing equivalent forensic social work services have provided pay information directly to the Human Resources Officer, used for comparative purposes in this report (See Appendix B). Appendix C shows regional data for mental health social worker posts provided by the South West Councils Group. Only the posts in Devon are directly comparable Forensic Social Worker posts.

3. Context

The Medium Secure Unit (MSU) Allowance was nationally agreed as an "Environmental Allowance" as described by the Federation of NHS Employers and the RCN. First agreed when Regional Secure Units (RSU's) were first set up - in line with Special Hospitals/High Secure Hospitals. In 1997 it was agreed to replace the Environmental Allowance with Market Supplements; "to enhance the councils capability to recruit staff in these hard to fill posts".

3.1 Fromeside is an 80 bed Medium Secure Unit run by the Avon and Wiltshire Mental Health Partnership NHS Trust (AWP). All service users are subject to the 1983 Mental Health Act. The majority have committed serious crimes, which include violent offences against the person, homicide, serious assault, sex related offences, criminal

damage and fire setting. Those admitted are viewed as “dangerous” and usually come from prison or from High Security Hospital (eg Broadmoor). The work environment is challenging. Workers are exposed to graphic descriptions of offences that can be disturbing and are subjected to frequent verbal and physical abuse and violence.

3.2 Forensic social work is a specialist role. The jobs require senior and experienced social workers who are able to work autonomously and within a multi-disciplinary team. The work involves:

- providing expert opinions
- complex risk management planning regarding discharge
- writing thorough and cogent Mental Health Review Tribunal reports
- attending and be answerable to Mental Health Review Tribunals
- formulating plans for assessment, treatment and rehabilitation

3.3 The City Council's Adult Community Care Department employs six Forensic Social Workers at the unit and the Forensic Liaison Manager/Social Care Lead. The posts are funded by the South of England Specialist Commissioning Group (SoESCG) and will come under the National Commissioning Board.

3.4 There is no directly comparable social work role in the City Council.

3.5 The staff turnover for the last twenty-four months has been high and compares to the Council's other social work functions as follows:

AWP Forensic Social Care Team - Social Workers (excluding the Forensic Liaison Manager & Social Care Lead)

Headcount: 6

Total Leavers: 3

Total Turnover: 50%

CYPS

Headcount: 276

Total Leavers: 57

Total Turnover: 21%

HSC

Headcount: 204

Total Leavers: 28

Total Turnover: 14%

3.6 The market supplement reviewed in this report was approved by the (former) Head of Paid Service in 2008 for a period of 3 years (expiring on 30th June 2011) at the request of the Service Director (H&SC) who considered that the options (as set out in the Council's Pay Policy Section 5.5) would not enable suitably qualified staff to be attracted and recruited at that time. The following options were considered:-

- i. Other ways of filling the vacancy (e.g. secondment, acting up etc)
- ii. Restructuring the section or team
- iii. Redesigning the duties & responsibilities of the post;
- iv. Re-appraising the realism of the job specification;
- v. The introduction of a career grade or trainee position, which will allow the appointment of a candidate with lesser skills and enable them to develop in the post.

This original market supplement was subsequently extended by the Human Resources Committee until 31st March 2012. It was agreed at the HR Committee agenda conference in February 2012 that this could be temporarily extended until the May 2012 HR Committee.

3.7 The Head of Service for the Avon & Wiltshire Partnership continues to support the view that none of the options in 3.6 would be feasible and/or enable suitably qualified staff to be attracted and recruited. They are in agreement that the market supplement is still required in order to recruit and maintain the team of Forensic Social Workers of the calibre required to undertake this specialist role.

3.8 In May 2012 the Associate Director of Commissioning South of England Specialist Commissioning Group (SoESCG) stated that they contract AWP to provide secure services including the provision of a comprehensive multidisciplinary team. Within that description there is an expectation to provide forensic social work. The service is also contracted to ensure compliance to the Integrated Service Model, the provision of expert aftercare and the delivery of the service in a timely and effective way, both financially and clinically.

It is not however the SoESCG role to stipulate the detail of how the provider can choose to deliver that service, albeit that they must deliver that service to high quality and to achieve the expectations inherent in the commissioning of the service, both within the specification and contract performance requirements.

It is the responsibility and a matter for the Trust to agree any recruitment incentive in response to their need to achieve the contract requirement. If the Trust wishes to use this incentive then they should

do so and the Associate Director is sure BCC would facilitate that. The funding of that would be within the quantum of the contract agreed with AWP 2012-13.

3.9 The Service Manager: Care Management and Mental Health (H&SC) is clear that Market Supplement (and all Salary and On-costs) are recharged to AWP so this does not incur a direct cost to the Council. It is not a cost pressure to the City Council as the Council is in effect hosting a regional service. Furthermore it is in the interest of the City Council that Forensic Social Worker posts are successfully recruited to. She therefore supports the payment of this allowance. She does not believe that this represents any risk through setting a precedence within the BCC workforce as it is a regional service, and there is no similar role within the council. The Team are an important resource to the City Council, at no direct cost and for example, contributes to the AMHP rota.

3.10 The HR Business Partner (for H&SC) advises that :-

(i) Other ways of filling the one current vacancy (e.g. secondment, acting up etc)

Secondments have been attempted previously, with a market supplement in place, without success. Due to the specialist and regional nature of the Forensic Social Work post there is no one in the region with the necessary experience.

(ii) Restructuring the section or team

The specialist commissioners of the service require lone autonomous Forensic Social Workers who are based in the multi-disciplinary sector teams. There is no other alternative structure.

(iii) Redesigning the duties & responsibilities of the post

The duties & responsibilities of the post are prescribed by the service commissioners in line with local requirements and "National Quality Principles & Best Practice Guidance" (Published May 2010). Redesigning the duties and responsibilities of the post is not feasible for the above reasons and also would not yield a grade uplift under the JE scheme.

(iv) Re-appraising the realism of the job specification

The job specification is at the correct level of experience and

qualifications as already defined for reasons set out in (ii) and (iii) above.

- (v) The introduction of a career grade or trainee position, which would allow the appointment of a candidate with lesser skills and enable them to develop in the post

Forensic Social Workers are senior practitioners who work autonomously and are based on their own in multi-disciplinary teams (ie not in a social work team where they might have worked under the direction of more senior social work colleagues.) and therefore a career grade or trainee position is not appropriate at the present time.

3.11 Furthermore, under section 5.5 the following criteria must be met before a market supplement can be awarded. (These criteria were judged to be met by the (former) Head of Paid Service in making his decision to approve the supplement in 2008). Following each criteria is the evidence or rationale to fulfil the criteria:

i) Where from available job advertisement information it is considered that the pay for a post is unlikely to attract candidates of sufficient calibre, experience and qualifications it would be appropriate to apply market forces supplements which in pay terms are validated by an independent, accredited pay research organisation.

ii) The Service Director and/or the recruitment adviser acting for the Council regarding appointments at senior management level will have explored and (where relevant) implemented other structure, career grade, and job design/evaluation alternatives, which may result in improvements in the pay/grade of the 'hard to fill' post concerned.

iii) A "risk assessment" will have been carried out to ensure that the above criteria have been objectively applied and are not based upon gender, race, disability, age etc.

iv) Have obtained legal views that any change in pay can be justified in terms of a genuine material defence.

3.12 The following evidence has been assembled (in response to the above criteria) :-

A survey of pay information for Social Workers (Forensic Services) and for Advanced Mental Health Practitioners has been carried out by HR in conjunction with South West Employers Group for regional data (Appendix C). The national data in Appendix B was submitted by the

relevant organisations directly to HR.

The results, which are set out in Appendices B and C (attached) show that: -

- i. not many other comparable local authorities provide the specialist social work services similar to the one which the forensic team in Bristol undertakes;
- ii. there is no readily identifiable 'market rate' for these posts, as pay structures and roles vary considerably between local authorities;
- iii. where such benchmarking comparisons do exist, it is evident that without some additional supplement, pay levels of posts in the City Council are not competitive.

For example, the data shows that in a number of south west authorities (Dorset, Plymouth and Wiltshire) and in other forensic social work teams nationally (Devon, East London and Sussex) Forensic Social Workers/AMHPs receive higher salaries and in some cases additional payments in the form of allowances or market supplements.

The table below supplied by STS HR Resourcing demonstrates the low response rate to adverts for Forensic Social Worker posts.

Perm or Temp	Date advertised	No. applications	Comments
Perm	Aug 07	8	
Perm	Mar 08	6	
Perm	Jan 10	12	2 ASWs applied but withdrew. Newly qualified SW appointed.
Temp	May 10	5	no ASWs/AMHPs applied . Newly qualified SW appointed
Temp	Dec 10	3	3 applicants who were all ASWs/AMHPs but all withdrew (1 post remained vacant and was not possible to appoint to on a temporary basis)
Perm	Sept 11	30	A large number of applicants but just <i>one</i> had the desired experience. Only 3 interviewed, post had to be offered

			elsewhere, as well as market supplements/ allowances. There have been ongoing recruitment problems.
(B) Discontinuation of the market supplement	High	Medium	Staff turnover may increase, the consequences of which in a very small, specialist team will be great, particularly where problems in recruitment are experienced with a supplement in place.

7. Equalities Impact Assessment

7.1 Removal or renewal of market supplement will have an equal impact on all staff within the forensic team.

Legal and Resource Implications

Legal

The proposal contained within this Report is in accordance with the Council's Pay Policy. The reasons provided for payment of the market supplement are likely to be a defence to any claim for equal pay. It is advisable to ensure the supplement is reviewed as proposed in the report to assess whether this defence still applies.

Advice from Husinara Jones for Head of Legal Services

Financial

(a) Revenue:

The cost of the additional market supplement is estimated to be £33k for 3 years (or pro rata for fewer years). The service is funded by Avon and Wiltshire Mental Health Partnership NHS Trust who are recharged the cost of this service. The recharge agreement will need to reflect the continuation of the market supplement.

Advice from Simon Merrett, Finance Manager, H&SC.

(b) Capital/Land:

N/A

Personnel

As above

Appendices

Appendix A: Pay Policy Extract
Appendix B: Forensic Social Worker Pay Details (National)
Appendix C: Comparator Pay AMHP & SW's South West
Appendix D: EqIA for Forensic Social Workers

LOCAL GOVERNMENT (ACCESS TO INFORMATION) ACT 1985 Background Papers:

None

TU Meeting 1 May 2012
Pay and Reward Package – Options for the future

This paper is prompted by our need to modernise and update the Council's Pay and Reward package. Guiding principles for pay and reward are that it should represent fairness, transparency and a system that is equitable for all. This should be underpinned by a simplified system with fewer allowances and the elimination of perverse or negative incentives e.g. sickness absence, which is the case with some working patterns.

Any proposals have to be affordable and funded from the existing pay budget for the Council as outlined in the Pay Policy statement.

This discussion paper seeks to address low pay in a sustainable, equitable and affordable way. There are anticipated savings from changing the working arrangements policy which could allow for a redistribution of pay which could address remuneration for the lower paid, as set out in the Council's recent Pay Policy Statement.

The new reward package will need to be simple and reward good performance with fair incentives. It will create a more flexible and agile workforce that offers employees wider employment opportunity within the Council and recognises the need for employees to increase their skills and employability.

This paper highlights the following proposals:

1. The one-off non consolidated payment to the lowest paid together with options for introducing a Living Wage
2. The review of the Council's Reward options including the working arrangements policy and the possible re-distribution of some of these savings

1. Lowest Paid - Non consolidated payment 2012/13

In response to the continued pay freeze, the Council has committed to making a one-off non-consolidated payment to the lowest paid employees for 2012-13.

Definitions of 'Low Paid'

For the purposes of this payment, the council may choose to define the 'lowest paid' in one of two ways. The first option is to define 'low paid' as those employees who are earning below the

'living wage' hourly rate of £7.30 an hour. In terms of Bristol City Council, this means that every employee paid below BG4 SCP 11 would fall below the 'living wage' threshold.

The alternative is to classify the 'low-paid' as any employee earning below £21,000 (Full Time Equivalent) per year. This amount has been identified by central government as the threshold for their own non-consolidated pay award this year.

If a payment were awarded to individuals earning less than £21,000 (FTE) this would apply to any employee on grade BG8 SCP24.

Living wage commitment to Lowest Paid – Moving forwards to a Consolidated payment

The Council wishes to commit to a 'living wage' threshold. This would mean offering an annual consolidated pay increase to those on the 'living wage' hourly rate of £7.30 an hour. This means that every employee paid below BG4 SCP 11 would fall below the 'living wage' threshold and could receive an annual consolidated pay increase raising their salary to above the living wage minimum.

2. Review of the Council's Reward options

Allowances

A system of pay currently exists which does not align to the principles of fairness. It seems that a higher percentage of male employees are paid additional contractual allowances than female employees. However, further analysis is required to confirm this.

Enhanced payment for weekend working

In a 24/7 working environment all employees should be rewarded equally whatever day of the week they work. Currently when people are sick over a weekend they continue to be paid weekend enhancement even though they are not working.

Shift Patterns

Shiftwork is prevalent in the council with employees working complex shift patterns which change from month to month. These consist of alternating shifts, rotating shifts, weekend working, night work and working on public holidays. Some of these enhancements pay employees less favourably for bank holiday working than weekend working. Should working a Sunday attract more pay than working a Bank Holiday? The working arrangements do not offer employees consistent working patterns and consideration could be given to moving to a more simplified working pattern such as annualised hours. This would also offer employees the same pay each month and the security of consistent working patterns.

It would also reduce the administrative burden to Managers and reduce the complexities which the council's pay roll system has to manage.

Contracts of Employment

It is anticipated that employees may benefit from being issued with new contracts of employment to reflect increased mobility, the changes in their roles and possibly in changes to their terms and conditions. This would be subject to discussion and consultation.

Job Evaluation Scheme and Job Design

It is proposed that the current JE scheme be retained. However we need to simplify job documentation using wider job families. This could enhance job enrichment and help employees on lower grades to progress with ease.

Review of Grading Structure

A review of the current pay bands with the possibility of offering more pay progression to employees through wider pay bands is suggested. This could address the issue of lower paid employees who are 'trapped' at the top of a narrow pay band with no opportunity for progression. BG1, BG2 and BG3 has only 3 spinal points in each grade, whereas BG10 has 5 spinal points therefore offering more pay progression for the individual.

Reward Strategy

A review of the incentives available to employees will be undertaken. This will focus on aligning reward more closely with performance with discussion around possible additional incentives bench-marked against other local authorities.

APPENDIX (6) B




Appendix B

Authority	Job Title	Grade	Pay Scale	Salary (Minimum)	Salary (Maximum)	Special Allowances	Other Benefits/Information
Bristol City Council	Social Worker - Adult Care	Main grade	SCP30 - 34	£25,472	£28,636	1830.84 market supplement	up to 29 days holiday (plus 8 public hols), final salary pension
		Advanced grade	SCP34 - 37	£28,636	£30,851	1830.84 market supplement	up to 29 days holiday (plus 8 public hols), final salary pension
East London NHS	Forensic Social Worker		PO3-PO4	35,055	40,506	£1446.00 Forensic Lead	27 days plus 5 days for long service 5 years plus (plus 8 Bank Holidays) final salary pension
East London NHS	Senior Practitioner		PO3-PO4	35,055	40,506	£1446.00 Forensic Lead	27 days plus 5 days for long service 5 years plus (plus 8 Bank Holidays) final salary pension
Sussex	Senior Social Worker					£1400 forensic lead payment	
Sussex	AMHP					£1200 supplement	
Devon	AMHP				£34,000	£3000 market supplement	
Merseyside	Forensic Social Worker	NHS Band 6	21-29	£25,472	£34,189	yes, tbc	
Merseyside	Senior Forensic SW	NHS Band 7	26-34	£30,460	£40,157	yes, tbc	
Birmingham	Forensic Social Worker	grade 5			£38,961	£1800 per annum forensic-environmental allowance	

APPENDIX (6) C

Appendix C

South West Regional Employers Evidence

Authority	Job Title	Grade	Pay Scale	Salary (Minimum)	Salary (Maximum)	Special Allowances	Other Benefits/Information	Job Descriptions/Person Specification
Bristol City Council	Social Worker - Adult Care	Main grade	SCP30 - 34	£25,472	£28,636			
		Advanced grade	SCP34 - 37	£28,636	£30,851			
Devon County Council	Advanced Professional (Approved Mental Health Professional / Mental Health)	Grade H	SCP 40-44	£33,661	£37,206		includes £3k market supplement	
Dorset County Council	Social Worker/Youth Justice Worker	Grade 9	SCP 26-31	£22,221	£26,276			The generic JD and PS applies to all Social Worker, Care Manager and Youth Justice Officer posts.  
		Grade 10	SCP 30-35	£25,472	£29,236			
		Grade 11	SCP 34 - 40	£28,636	£33,661			
Plymouth City Council	Social Worker - Adult Social Care	Grade H	SCP 36-40	£30,011	£33,661			
Wiltshire Council	Social Worker level 2		SCP 31 - 34	£26,276	£28,636			
	Social Worker level 3		SCP 34 - 37	£28,636	£30,851			
	Social Worker level 4		SCP 37 - 40	£30,851	£33,661			
	Approved Social Worker		SCP 40 - 43	£33,661	£36,316			
Somerset County Council	No equivalent role, but some of the duties are undertaken by: Social Worker - Adults	G10	SCP 32 - 37	£27,052	£30,851			
Bath & NE Somerset Council	No equivalent role							
Bournemouth	No equivalent role							
South Gloucestershire Council	No equivalent role							

Equality Impact Assessment (EqIA)
Stage 1: Initial Screening Form for New/Revised HR Policies or Functions

A: Summary Details

Directorate: Health and Social Care

Section: Forensic Social Work Team, Fromside

Person responsible for the assessment: Bryn Williams / Richard Prior (Team Manager)

Contact details: 0117 922 2655

Issue to be assessed: Social workers pay

Is this a new or revised policy: Revision of existing arrangements

Date policy scheduled for Overview and Scrutiny/Cabinet/LAB: n/a

B: Preparation

It is important to consider all available information that could help determine whether the policy could have any potential adverse impact. Please attach examples of available monitoring information, research and consultation reports.

1. Do you have monitoring data available on the number of people (from different target groups) who are using or are potentially impacted upon by your policy? *Please specify what monitoring information you have available (your monitoring information should be compared to the current available census data to see whether a proportionate number of people are taking up your service).*

Data available by team/areas

2. If monitoring has NOT been undertaken, will it be done in the future or do you have access to relevant monitoring data for this area? If not, specify the arrangement you intend to make; if not please give a reason for your decision.

If the market supplement is approved, it will be applied equally to all Forensic Social Workers in post in future.

3. Please list any consultations that you may have had and/or local/national consultations, research or practical guidance that will assist you in completing this EqIA

Discussions with senior managers and team manager.

C: Your Policy or Function

What is the main purpose of the revision?

To consider a market supplement payment for frontline social work to aid recruitment and retention in this area; make Bristol City Council a more competitive employer.

Are there any other objectives of the policy or function, if so what are they?

No.

Do any written procedures exist to enable delivery of this revision?

na

Are there elements of common practice in the service area or function that are not clearly defined within the written procedures?

na

Who are the main stakeholders of the policy?

Forensic Team manager and Social workers in the Forensic Team at Fromeside.

Is the policy associated with any other Council policy (s)?

Pay policy.

Are there any areas of the service that are governed by discretionary powers? If so, is there clear guidance as to how to exercise these?

no

Is the responsibility for the proposed policy or function shared with another department or authority or organisation? If so, what responsibility, and which bodies?

The Forensic Social Workers are employed by BCC and work in partnership and under the joint management of the Avon and Wiltshire Mental Health Partnership.

D: The Impact

Assess the potential impact that the policy could have on each of the target groups. The potential impact could be negative, positive or neutral. If you have assessed negative potential impact for any of the target groups you will need to also assess whether that negative potential impact is high, medium or low – see glossary in the attached guidance notes for definitions.

1.

a) Identify the potential impact of the policy on men and women:

Gender	Positive	Negative (please specify if High, Medium or Low)	Neutral	Reason
Women	x			
Men	x			

b) Identify the potential impact of the policy on different race groups:

Race	Positive	Negative (please specify if High, Medium or Low)	Neutral	Reason
	x			

c) Identify the potential impact of the policy on disabled people:

Disability	Positive	Negative (please specify if High, Medium or Low)	Neutral	Reason
	x			

d) Identify the potential impact of the policy on different age groups:

Age Group (specify, for example younger, older etc)	Positive	Negative (please specify if High, Medium or Low)	Neutral	Reason
	x			

e) Identify the potential impact of the policy on lesbian, gay men, bisexual or heterosexual people:

Sexual Orientation	Positive	Negative (please specify if High, Medium or Low)	Neutral	Reason
Lesbian	x			

Gay Men	x			
Bisexual	x			
Heterosexual	x			

f) Identify the potential impact the policy on different religious/faith groups?

Religious/Faith groups (specify)	Positive	Negative (please specify if High, Medium or Low)	Neutral	Reason
	x			

g) As a result of completing Question 1 a-f above what is the potential impact of your policy?

High

Medium

Low

If you have assessed the potential impact as HIGH you must complete a full Equalities Impact Assessment

2. Could you minimise or remove any negative potential impact that is of medium or low significance? Explain How.

N/A

Race:

Gender:

Disability:

Age:

Sexual Orientation:

Religious/Faith groups:

3. If there is no evidence that the policy promotes equal opportunity– could it be adapted so it does? How?

NA

Please ensure that all actions identified are included in the attached action plan and in your service plan.

Please sign and date this form, keep one copy and send one to Equalities Team.

Signed
Lead Officer
Date 27/04/12

Bryn Williams

Signed
Departmental Equalities Contact
Date