

Freedom to Speak up – Raising Concerns (Whistleblowing policy)

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Equality Impact

Equality Impact Bolton NHS Foundation Trust strives to ensure equality of opportunity for all service users, local people and the workforce. As an employer and a provider of healthcare Bolton NHS FT aims to ensure that none are placed at a disadvantage as a result of its policies and procedures. This document has therefore been equality impact assessed to ensure fairness and consistency for all those covered by it regardless of their individuality. The results are shown in the Equality Impact Assessment (EIA).

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Version Control

Version	Type of Change	Date	Revisions from previous issues
V. 5	Full review	May 2013	<ul style="list-style-type: none"> • Change in name from 'Whistleblowing' to Raising concerns policy • Inclusion of Our Commitment to You' section • Updated NED Champion • Reflective of Speak up for a healthy NHS- Whistle blowing arrangements guidance
V. 6	General review	Feb 2014	<ul style="list-style-type: none"> • General review to ensure policy remains fit for practice
V.7-9	General review	Sept 2016	<ul style="list-style-type: none"> • General review to ensure policy remains fit for practice • Outline Trust Freedom to Speak Up arrangements
V. 10	General review	June 2020	<ul style="list-style-type: none"> • General review to ensure policy remains fit for practice • To provide a policy in line with the National integrated whistleblowing policy as per The Freedom to Speak UP review by Sir Robert Francis QC to ensure consistency across the NHS

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1. Purpose- Speak up – We will listen

All of us at one time or another has concerns about what is happening at work. Usually these issues are easily resolved. However when the concern feels serious because it is about a possible danger, professional misconduct or financial malpractice that might affect patients, colleagues or the Trust itself, it can be difficult to know what to do.

Speaking up about any concern you have at work is really important. In fact, it's vital because effective speaking up arrangements help to protect patients and improve the experience of staff.

We know the main reasons workers do not speak up are because they fear they might be victimised or because they do not believe anything will change. You may feel worried about raising a concern, and we understand this. But please don't be put off. In accordance with our duty of candour, our senior leaders and entire Trust Board are committed to an open and honest culture. We will look into what you say and you will always have access to the support you need.

2. Content

This 'standard integrated policy' was one of a number of recommendations of the review by Sir Robert Francis into whistleblowing in the NHS, aimed at improving the experience of whistleblowing in the NHS. It is expected that this policy (produced by NHS Improvement and NHS England) will be adopted by all NHS organisations in England as a minimum standard to help to normalise the raising of concerns for the benefit of all patients.

Our local process adheres to the principles of this policy and provides more detail about how we will look into a concern.

The Board of Bolton NHS Foundation Trust is committed to running the organisation in the best way possible and to do so it requires the support of all staff within the organisation to speak up about any concerns that they may have in relation to the operation of the organisation.

This policy has been developed to reassure staff that it is safe and acceptable to speak up and to encourage staff to raise any concerns that they have at an early stage and in the appropriate way.

3. Roles and Responsibilities

Chief Executive and Chair

The Chief Executive is responsible for appointing the FTSU Guardian and is ultimately accountable for ensuring that FTSU arrangements meet the needs of the workers in the Trust. The Chief Executive and the Chair role model high standards of conduct around FTSU and are responsible for ensuring the annual report contains

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information about FTSU and the Trust is engaged with both the regional FTSU network and the National Guardians Office (NGO).

Both the Chief Executive and the Chair are key sources of advice and support for their FTSU Guardian.

The Executive Lead for FTSU

The Executive Lead is responsible for:

- Role modelling high standards of conduct around FTSU
- Ensure they are aware of the latest guidance from the NGO
- Overseeing the creation of the FTSU vision and strategy
- Ensuring the FTSU role has been implemented and they have a suitable amount of ring-fenced time and other resources.
- Operationalizing the learning from speaking up issues
- Ensuring instances where individuals may have suffered detriment for speaking up are promptly and fairly investigated and acted on.

The Non-Executive Lead for FTSU

The Non-Executive Lead is responsible for:

- Role modelling high standards of conduct around FTSU
- Ensure they are aware of the latest guidance from the NGO
- Challenging the Chief Executive, Executive Lead for FTSU and the Board to reflect on whether they could do more to create a healthy and effective speaking up culture
- Acting as an alternative source of advice and support to the FTSU Guardian
- Overseeing speaking up matters regarding Trust Board members.

Executive Directors

All Executive Directors have a responsibility for creating a safe culture and an environment in which workers are able to highlight problems and make suggestions for improvement. They also understand that an organisational or department culture of bullying and harassment or one that is not welcoming of new ideas or different

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perspectives may prevent workers from speaking up which could put patients at risk, affect many aspects of their staff's working lives and reduce the likelihood that improvements can be made.

Executive Directors understand the impact of their behaviour can have on a Trusts culture and therefore how important it is that they reflect on whether their behaviour may inhibit or encourage someone speaking up.

To this end Executive Directors:

- Are able to articulate both the importance of workers feeling able to speak up and the Trusts own vision to achieve this.
- Speak up, listen and constructively challenge one another during Board meetings.
- Are visible and approachable and welcome approaches from workers.
- Have insight into how their power could silence truth
- Thank workers who speak up
- Demonstrate that they have heard when workers speak up by providing feedback
- Seek feedback from peers and workers and reflect on how effectively they demonstrate the Trusts values and behaviours.
- Accept challenging feedback constructively, publicly acknowledge mistakes and make improvements

Trust Board

The Trust Board demonstrates its commitment to creating an open and honest culture where workers feel safe to speak up by:

- Having named Executive and Non-Executive Leads responsible for speaking up who can demonstrate that they are clear about their role and responsibility.
- Including speaking up in the Trust induction programme.
- Having a sustained and ongoing focus on the reduction of bullying, harassment and incivility.
- Sending out clear messages that it will not tolerate the victimisation of workers who have spoken up and taking action should this occur. The Executive Lead for FTSU is responsible for gaining assurance that the experience of workers who speak up is a positive one.

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- Investing in sustained and continuous leadership development.
- Having a resourced FTSU Guardian and Champion network

Human Resource (HR) and Organisational Development (OD) Directors

HR and OD directors are responsible for ensuring that:

- Values and behaviours associated with FTSU such as courage, impartiality, empathy and learning are embedded throughout the recruitment, appraisal and termination processes.
- All workers have the capability and the access to appropriate resources to enable them to role model high standard of conduct around FTSU.
- Speaking up is understood and interpreted in the broadest sense: there is no artificial distinction made between ‘whistleblowing’ and other speaking up activities or between formal and informal concerns. Workers and managers understand that speaking up encompasses matters that might be referred to as ‘raising concerns’, ‘complaining’, ‘raising a grievance’, or ‘whistleblowing’. It also includes making suggestions for improvement.
- The Trust understands the impact that worker experience, including bullying and harassment, engagement levels and other cultural issues can have on patient safety, staff health and on Trust performance.
- The Trust has a robust process to review claims that workers have suffered detriment as a result of speaking up.
- The Trust evaluates all speaking up routes (including speaking to the FTSU Guardian) and assesses why particular routes are used, addressing any barriers that prevent workers from using non-guardian routes.
- Supporting the FTSU Guardian with appropriate access to information to enable them to triangulate intelligence from speaking up issues with other cultural and worker experience indicators.
- The Trust has a leadership development programme that supports managers to have meaningful and compassionate conversations, give and receive feedback constructively and support others to work productively and develop themselves.

The FTSU Guardian

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The FTSU Guardian (and Champions) are responsible for ensuring that:

- They are accessible to all staff who wish to speak up.
- Staff are thanked for speaking up and supported in achieving resolution and ensuring feedback is given.
- They remain impartial and support/ signpost staff as necessary
- They maintain confidentiality where appropriate but ensure their concerns are discussed with the relevant managers
- They (FTSU Guardian only) meets with the Chief Executive, Executive Director of Workforce and Non-Executive Lead for FTSU monthly to discuss cases to ensure that staff have their concerns heard.
- Reports are compiled for relevant committees (quarterly to WAC- Workforce Assurance Committee) and to the National Guardian Office on a quarterly basis to inform them of the numbers of staff who have spoken up and the themes of the issues raised. (FTSU Guardian only)
- An annual report to the Trust Board is presented to inform the board of the issues raised. (FTSU Guardian only)

4. What concerns can I raise?

You can raise a concern about risk, malpractice or wrongdoing you think is harming the service we deliver. Just a few examples of this might include (but are by no means restricted to):

- Unsafe patient care
- Unsafe working conditions
- Inadequate induction or training for staff
- Lack of, or poor, response to a reported patient safety incident
- Suspicions of fraud -which **must** also be reported to our local counter-fraud team. (See Appendix 3 for contact details)
- A bullying culture (across a team or organisation or individual instances of bullying).

Remember that if you are a healthcare professional you may have a professional duty to report a concern. **If in doubt, please raise it.**

Don't wait for proof. We would like you to raise the matter while it is still a concern. It doesn't matter if you turn out to be mistaken as long as you are genuinely troubled.

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This policy is not for people with concerns about their employment that affect only them – that type of concern is better suited to our Resolution policy.

5. Feel safe to raise your concern

If you raise a genuine concern under this policy, you will not be at risk of losing your job or suffering any form of reprisal as a result. We will not tolerate the harassment or victimisation of anyone raising a concern. Nor will we tolerate any attempt to bully you into not raising any such concern. Any such behaviour is a breach of our values as an organisation and, if upheld following investigation, could result in disciplinary action.

Provided you are acting honestly, it does not matter if you are mistaken or if there is an innocent explanation for your concerns.

6. Confidentiality/ Anonymity

We hope you will feel comfortable raising your concern openly, but we also appreciate that you may want to raise it confidentially. This means that while you are willing for your identity to be known to the person you report your concern to, you do not want anyone else to know your identity. Therefore, we will keep your identity confidential, if that is what you want, unless required to disclose it by law (for example, by the police). You can choose to raise your concern anonymously, without giving anyone your name, but that may make it more difficult for us to investigate thoroughly and give you feedback on the outcome.

We may have a responsibility to share your concern with the Safeguarding Team or with a Regulatory Body. This would be discussed with you if necessary.

7. Who can raise concerns?

Anyone who works (or has worked) in the NHS, or for an independent organisation that provides NHS services can raise concerns. This includes agency workers, temporary workers, students, volunteers and governors.

8. Who should I raise my concern with?

In many circumstances the easiest way to get your concern resolved will be to raise it formally or informally with your line manager (or lead clinician or tutor). But where you don't think it is appropriate to do this, you can use any of the options set out below in the first instance.

If raising it with your line manager (or lead clinician or tutor) does not resolve matters, or you do not feel able to raise it with them, you can contact one of the following people:

- Our Freedom to Speak Up Guardian or Champion– this is an important role identified in the Freedom to Speak Up review to act as an independent and impartial

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source of advice to staff at any stage of raising a concern, with access to anyone in the organisation, including the Chief Executive, or if necessary, outside the organisation

- Our Risk Management Team
- Human Resources
- Trade Union

If you still remain concerned after this, you can contact:

- Our Executive Director with responsibility for whistleblowing
- Our Non-Executive Director with responsibility for whistleblowing

All these individuals have been trained in receiving concerns and will give you information about where you can go for more support.

If for any reason you do not feel comfortable raising your concern internally, you can raise concerns with external bodies (see page 12)

9. Advice and Support

Details on the local support available to you can be found on the Trust Intranet site However; you can also contact the Whistleblowing Helpline for the NHS and social care, your professional body or trade union representative.

10. How should I raise my concern?

You can raise your concerns with any of the people listed above in person, by phone or in writing (including email).

Whichever route you choose, please be ready to explain as fully as you can the information and circumstances that gave rise to your concern.

11. What will we do?

We are committed to the principles of the Freedom to Speak Up review and its vision for raising concerns, and will respond in line with them.

We are committed to listening to our staff, learning lessons and improving patient care. On receipt the concern will be recorded and you will receive an acknowledgement within two working days. The central record will record the date the concern was received, whether you have requested confidentiality, a summary of the concerns and dates when we have given you updates or feedback.

Investigation.

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Where you have been unable to resolve the matter quickly (usually within a few days) with your line manager, we will carry out a proportionate investigation – using someone suitably independent (usually from a different part of the organisation) and properly trained – and we will reach a conclusion within a reasonable timescale (which we will notify you of). Wherever possible we will carry out a single investigation (so, for example, where a concern is raised about a patient safety incident, we will usually undertake a single investigation that looks at your concern and the wider circumstances of the incident). The investigation will be objective and evidence-based, and will produce a report that focuses on identifying and rectifying any issues, and learning lessons to prevent problems recurring.

We may decide that your concern would be better looked at under another process; for example, our Resolution Policy. If so, we will discuss that with you.

Any employment issues (that affect only you and not others) identified during the investigation will be considered separately.

Communicating with you.

We will treat you with respect at all times and will thank you for raising your concerns. We will discuss your concerns with you to ensure we understand exactly what you are worried about. We will tell you how long we expect the investigation to take and keep you up to date with its progress. Wherever possible, we will share the full investigation report with you (while respecting the confidentiality of others).

How will we learn from your concern?

The focus of the investigation will be on improving the service we provide for patients. Where it identifies improvements that can be made, we will track them to ensure necessary changes are made, and are working effectively. Lessons will be shared with teams across the organisation, or more widely, as appropriate.

Board oversight

The Trust Board will be given high level information about all concerns raised by our staff through this policy and what we are doing to address any problems. We will include similar high level information in our annual report. The Board supports staff raising concerns and wants you to feel free to speak up.

Review

We will review the effectiveness of this policy and local process at least annually, with the outcome published and changes made as appropriate.

12. Raising your concern with an outside body

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Alternatively, you can raise your concern outside the organisation with:

NHS Improvement for concerns about:

- How NHS Trusts and Foundation Trusts are being run
- Other providers with an NHS provider licence
- NHS Procurement, choice and competition
- The national tariff

Care Quality Commission for quality and safety concerns

NHS England for concerns about:

- primary medical services (general practice)
- primary dental services
- primary ophthalmic services
- local pharmaceutical services

Health Education England for education and training in the NHS

NHS Protect for concerns about fraud and corruption.

Making a 'protected disclosure'

There are very specific criteria that need to be met for an individual to be covered by whistleblowing law when they raise a concern (to be able to claim the protection that accompanies it). There is also a defined list of 'prescribed persons', similar to the list of outside bodies on page 8, who you can make a protected disclosure to. To help you consider whether you might meet these criteria, please seek independent advice from the Whistleblowing Helpline for the NHS and social care, Public Concern at Work or a legal representative.

National Guardian Freedom to Speak Up

The National Guardian Office can independently review how staff have been treated having raised concerns where NHS trusts and foundation trusts may have failed to follow good practice, working with some of the bodies listed above to take action where needed.

APPENDIX ONE: Example process for raising and escalating a concern

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Example process for raising and escalating a concern:

Step one

If you have a concern about a risk, malpractice or wrongdoing at work, we hope you will feel able to raise it first with your line manager, lead clinician or tutor (for students). This may be done orally or in writing.

Step two

If you feel unable to raise the matter with your line manager, lead clinician or tutor, for whatever reason, please raise the matter with our local Freedom to Speak Up Guardian or one of the Freedom to Speak Up Champions (Details on BOB and Appendix 3):

These individuals have been given special responsibility and training in dealing with whistleblowing concerns. They will:

- Thank you for raising the concern
- Treat your concern confidentially unless otherwise agreed
- Ensure you receive timely support to progress your concern
- Escalate to the Board any indications that you are being subjected to detriment for raising your concern
- Remind the organisation of the need to give you timely feedback on how your concern is being dealt with
- Ensure you have access to personal support since raising your concern may be stressful.

If you want to raise the matter in confidence, please say so at the outset so that appropriate arrangements can be made.

Step three

If these channels have been followed and you still have concerns, or if you feel that the matter is so serious that you cannot discuss it with any of the above, please contact the Chief Executive/ Executive Lead (Director of Workforce) or Non-Executive Lead.

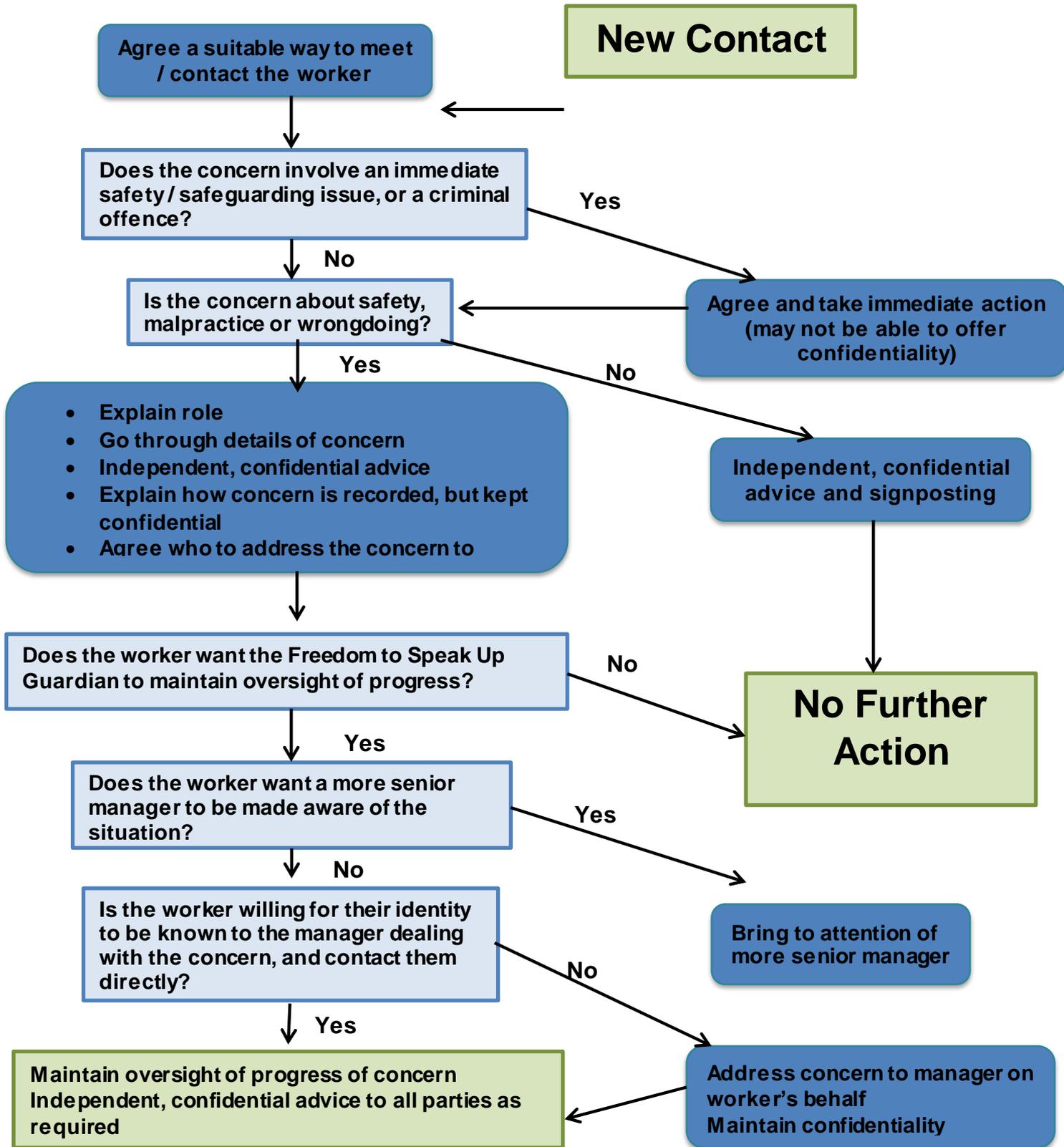
Step four

You can raise concerns formally with external bodies.

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Freedom to Speak Up Guardian: Dealing with New Concerns



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APPENDIX TWO: A Vision for Raising Concerns



Source: Sir Robert Francis QC (2015) Freedom to Speak Up: an independent report into creating an open and honest reporting culture in the NHS.

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APPENDIX THREE:

Key Contacts and responsibilities:

1. Human Resources Managers:

Human Resources Team are available to navigate the employment relationship, manage the employment related risks and support the organisation to resolve individual and collective matters through the framework of formal and informal policies and processes.

Deborah Lowe	01204 390838	Deborah.lowe@boltonft.nhs.uk
Jenny Holding	01204 390928	Jennifer.Holding@boltonft.nhs.uk
Gillian Childs	01204 390965	Gillian.Childs@boltonft.nhs.uk
Janet Healey	01204 390837	Janet.Healey@boltonft.nhs.uk
Andrea Gillian	01204 390391	andrea.gillan@boltonft.nhs.uk

2. Human Resource Advisors:

Toni Smith	01204 390030	toni.smith@boltonft.nhs.uk
Rebecca Sixsmith	01204 390095	Rebecca.sixsmith@boltonft.nhs.uk
Heather Tracey	01204 390347	Heather.Tracey@boltonft.nhs.uk
Becky Colderley	01204 390210	becky.colderley@boltonft.nhs.uk
Jackie Howard	01204 390308	Jackie.Howard@boltonft.nhs.uk
Chloe Everall	01204 390810	Chloe.Everall@boltonft.nhs.uk
Andrea Roberts	01204 390813	Andrea.Roberts@boltonft.nhs.uk

2. Freedom to Speak Up Guardian:

The FTSU Guardian and Champion is an independent, impartial role to support staff in speaking up about their concerns. They can help signpost staff and ensure the staff members concerns are listened to and responded to. The FTSU Guardian and Champions do not get involved in any investigations but can support staff through the process.

Tracey Garde
Bleep 3456
Tracey.garde@boltonft.nhs.uk

FTSU Executive Lead-
James Mawrey
James.mawrey@boltonft.nhs.uk

FTSU Non- Executive Lead-

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Cllr Bilkis Ismail
 Crompton Ward, Bolton
 Bilkis.ismail@boltonft.nhs.uk

4. Freedom to Speak Up Champions

Kirsty Buckley Kirsty.buckley@boltonft.nhs.uk	Haematology Specialist Nurse	Adult Acute Division
Natalie Walker Natalie.walker@boltonft.mhs.uk	Acute Physician	Adult Acute Division
Julie Pilkington Julie.pilkington@boltonft.nhs.uk	Acting DND	Anaesthetics and Surgical Division
Amanda Buckley Amanda.buckley@boltonft.nhs.uk	HCA G3 Ward	Anaesthetics and Surgical Division
Ruth Adamson Ruth.adamson@boltonft.nhs.uk	Anaesthetics & Operations Support Manager	Anaesthetics and Surgical Division
Rahila Ahmed Rahila.ahmed@boltonft.nhs.uk	Equality, Diversity & Inclusion Lead	Corporate Services Division
Tony Mackay Anthony.Mackay@boltonft.nhs.uk	Falls Co-ordinator	Corporate Services Division
Neville Markham Neville.markham@boltonft.nhs.uk	Chaplain	Corporate Services Division
Sharon Lythgoe Sharon.lythgoe@boltonft.nhs.uk	EPR Project Manager	Corporate Services Division

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Charlotte Anderson Charlotte.anderson@boltonft.nhs.uk	Business Analyst	Corporate Services Division
Rachel Davidson Rachel.davidson@boltonft.nhs.uk	Senior Radiographer	Diagnostic and Support Services
Rebena Khan Rebena.khan@boltonft.nhs.uk	Pharmacist	Diagnostic and Support Services
Louise Quigley Louise.Quigley@boltonft.nhs.uk	Health Records & Receptions Coordinator	Diagnostic and Support Services
Jeanette Fielding Jeanette.fielding@boltonft.nhs.uk	Midwife	Families Care Division
Alison Toft (On secondment to Great Ormond Street until June 2021)	Paediatric Occupational Therapist	Families Care Division
Bim Williams Bim.williams@boltonft.nhs.uk	Obstetrics & Gynaecology Consultant	Families Care Division
Vicki O'Dowd Vicki.o'dowd@boltonft.nhs.uk	Midwife	Families Care Division
Simon Crozier Simon.crozier@boltonft.nhs.uk	Principle Service Lead / Advanced Physiotherapist-Stroke	Integrated Community Services
Atir Khan Atir.khan@boltonft.nhs.uk	Consultant Physician Diabetes & Endocrinology	Integrated Community Services
Suzanne Lomax Suzanne.lomax@boltonft.nhs.uk	Clinical Service Lead – Bereavement Service	Integrated Community Services

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Gina Riley Gina.riley@boltonft.nhs.uk	Deputy Divisional Nurse Director	Integrated Community Services
Chris Vernon Chris.vernon@boltonft.nhs.uk	Integrated Neighbourhood Team Leader	Integrated Community Services
Gareth Valentine Gareth.valentine@boltonft.nhs.uk	Staff Nurse	Integrated Community Services
Urvasi Skinner Urvasi.skinner@boltonft.nhs.uk	OT	Integrated Community Services
Nita Patel Nita.patel@boltonft.nhs.uk	Diabetes Specialist Nurse	Integrated Community Services
Lisa Grognet Lisa.grognet@boltonft.nhs.uk	Nursing Associate- Homeless and Vulnerable Adults Clinical Educator for TNAs	Integrated Community Services Workforce and OD

5. Counter Fraud Officer:

The Local Counter Fraud Specialist is responsible for taking forward all anti-fraud work locally in accordance with national standards and reports directly to the Director of Finance. The LCFS will work with key colleagues and stakeholders to promote anti-fraud work, apply effective preventative measures and investigate allegations of fraud and corruption

Counter Fraud Officer:

Collette Ryan

07827 835979 (Mobile)

collette.ryan@boltonft.nhs.uk

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6. Staff side/ Union representation

A Union Steward is available to offer advice and support to members during informal and formal process. Representatives can offer confidential advice, support with resolutions and guide members through situations as they arise.

Advice can be sought either from an individual or a collective if it is a matter that involves more than one individual.

For details of your union contact the union office 01204 390846 ext. 5846

Onsite Union:
Royal College of Nursing
01204 390953
Unison
01204 390846

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APPENDIX FOUR : Equality Impact Assessment Tool

To be completed and attached to any procedural document when submitted to the appropriate committee for consideration and approval.

		Yes/No	Comments
1.	Does the document/guidance affect one group less or more favourably than another on the basis of:		
	Race	No	
	Ethnic origins (including gypsies and travellers)	No	
	Nationality	No	
	Gender (including gender reassignment)	No	
	Culture	No	
	Religion or belief	No	
	Sexual orientation	No	
	Age	No	
	Disability - learning disabilities, physical disability, sensory impairment and mental health problems	No	
2.	Is there any evidence that some groups are affected differently?	No	
3.	If you have identified potential discrimination, are there any valid exceptions, legal and/or justifiable?	N/a	
4.	Is the impact of the document/guidance likely to be negative?	N/a	
5.	If so, can the impact be avoided?	N/a	
6.	What alternative is there to achieving the document/guidance without the impact?	N/a	
7.	Can we reduce the impact by taking different action?	N/a	

If you have identified a potential discriminatory impact of this procedural document, please refer it to your divisional E and D lead together with any suggestions as to the action required to avoid/reduce this impact.

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