

## Policy for Safe Operation and Working on Pressure Systems (Excludes MGPS)

<b>Department / Service:</b>	Estates
<b>Originator:</b>	Simon Noon Principal Engineer & Statutory Standards Manager
<b>Accountable Director:</b>	Scott Dickenson – Director of Estates and facilities
<b>Approved by:</b>	Ray Cochrane - Head of Estates, Trust Management Executive
<b>Date of approval:</b>	19 <sup>th</sup> January 2022
<b>Review date:</b>	29 <sup>th</sup> December 2026
<b>This is the most current document and should be used until a revised version is in place</b>	
<b>Target Organisation(s):</b>	Worcestershire Acute Hospitals NHS Trust
<b>Target Departments:</b>	Trust Snr Mgmt, Estates and Facilities
<b>Target staff categories:</b>	Managers, Technicians, Contractors, Agency Staff

### Policy Overview:

This Policy will outline how the Trust Manage, Operate and Work on Pressure Systems affecting visitors, contractors, agency staff and WAHT staff in accordance with the requirements of The Pressure Systems Safety Regulations 2000.

### Key amendments to this document

Date	Amendment	Approved by:
January 2022	Document approved	TME
30 <sup>th</sup> June 2026	Document extended for 6 months to allow time for review and update	Briony Mills

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### **Quick Reference Guide**

The purpose of this policy is to outline the steps to be taken by Worcester Acute Hospital Trust to ensure that staff, contractors and others do not work or operate Pressure Systems unless trained, experienced, familiar, competent and appointed to do so.

### **1.0 Introduction**

1.1 A pressure system is as detailed within The Pressure Systems Safety Regulations 2000.

Pressure systems are defined as:

- a system comprising one or more pressure vessels of rigid construction, any associated pipework and protective devices
- the pipework with its protective devices to which a transportable pressure receptacle is, or is intended to be, connected
- a pipeline and its protective devices
- and for the purpose of this Policy to any LTHW system where there is an increased risk of stored energy due to volume, pressure and or temperature, as defined by the AE PS.

A relevant fluid is:

- steam at any pressure
- any fluid or mixture of fluids which is at a pressure >0.5 bar above atmospheric
- a gas dissolved under pressure in a solvent (acetylene)

Relevant fluids do not include hydraulic oils. Hydraulic systems, while using high pressures, do not store energy in the system and so are not covered by this legislation.

1.2 The adopted Safety Rules and Procedures will control the risks within a differing range of systems, which fall into the category of Pressure Systems due to the risk of a stored energy being present. A wide range of tasks are possible from a visual inspection through to repair requiring the use of hot working methods etc. The essential criteria, which are used to identify if the work requires to be controlled by permit are the risks of:

- Uncontrolled release of stored energy
- Scalding / Burns Fire or explosion, Asphyxiation
- Poisoning
- Contamination of environment

### **2. Scope of this document**

2.1 This policy is applicable to all Trust staff, contractors and agency staff working within the WAHT. Persons responsible for developing Pressure Systems related guidance or procedures must ensure that it complies with this policy.

### 3. Definitions

Duty Holder	Chief Executive. Worcestershire Acute Hospitals NHS Trust
Designated Person	Person who is appointed by the Duty Holder with suitable and sufficient knowledge of Hospital Pressure Systems, who will make Trust senior management aware of any major risks presented by the hospital
BPS	Boiler and Pressure systems abbreviation to describe relevant pressure systems
Authorising Engineer (AE) (BPS)	Person who has completed an accepted Authorising Engineer course, is familiar with the site installation and the requirements of Pressure systems Safety Regulations (2002) and is appointed by the Designated Person to define the requirements of the site, appoint sufficient APs to manage the system and audit the site as required.
Responsible Person / Co-ordinating Authorised Person	Person who has completed an accepted BPS AP course, is familiar with the site installation and the requirements of Pressure systems Safety Regulations (2002) and has been appointed by the authorising engineer as Senior AP BPS, coordinates all pressure system activities across WAHT systems.
Authorised Person (AP)	Person who has completed an approved BPS AP course, is familiar with the site installation and has been appointed by the AE(BPS) as an AP(BPS)
Competent Person (CP)	Person who is deemed competent by the AP, has relevant training and experience, is familiar with the site installation and has been appointed by the AP(BPS).
Written Scheme	Schedule of BPS equipment compiled by a suitably qualified Insurance inspector detailing when elements of the BPS are inspected / examined / tested.
Safe system of Work (SSOW)	Safety rules devised by AE which define how work will be controlled and carried out on BPS to manage danger
Permit to Work	Document issued by AP BPS and accepted by CP, which clearly describes how danger is controlled and ensures system is made safe before any work on BPS is started
Enforcing Authority	Health and Safety Executive
Method Statement	Details of how the work is to be done safely.
MSDS	Material Safety Data Sheet supplied by manufacturers of Hazardous Substances – required by COSHH regulations – identifies precautions to be taken when dealing with hazardous substances.

#### **4. Responsibilities and Duties**

4.1 The Chief Executive will ensure that a Designated Person (DP) is appointed to ensure that this Policy and a suitable Safe System of Work is in place to control all work and operation of Pressure Systems.

Ensuring that all staff involved are aware of this policy, understand its content and comply with local procedures and the adopted Safe Systems of Work;

4.2 The Head of Estates will assume the role of Designated Person (DP) and ensure a Safe System of Work is adopted, that adequate resources are available and suitably trained and experienced staff are appointed to manage, administer and implement the Safe System of Work.

The DP will appoint an Authorising Engineer (Pressure Systems) to implement, administer, monitor and audit the adoption of the Safe System Work (SSoW) and ensure that a competent manager is responsible for boilers.

4.3 Principal Engineer / Statutory Standards Manager will ensure that the adopted Safe System of Work is fully implemented and ensure that adequate competent resource is available for training, familiarisation and appointment as Authorised Persons (Pressure Systems). That all systems where required are regularly inspected by a Competent Person and operated and maintained in a safe condition.

#### **4.4 Authorising Engineer (Pressure Systems) AEPS**

The Authorising Engineer (Pressure Systems) is to be a suitably qualified, trained Engineer with relevant experience in Pressure Systems and Safe Systems of Work.

The Authorising Engineer (Pressure Systems) is required to demonstrate to the satisfaction of the Head of Estates the following:

- Knowledge and familiarity with the types of the Pressure Systems incorporated within their area of responsibility.
- A full and thorough understanding of these Safety Rules and Procedures and any local variations within their area of responsibility.
- A general understanding of all relevant current legislation in particular the Pressure Systems Safety Regulations 2000

#### **Role**

The role of the Authorising Engineer (Pressure Systems) is to implement, administer, monitor and audit the adopted Safety Rules and Procedures.

Duties - Include but are not restricted to:

- Making recommendations to update any proposed changes and to the adopted Safety Rules and Procedures to cover current work activities.
- Ensure that Safety, Technical and Environmental Directives, Alerts and Bulletins relating to Pressure Systems are issued as appropriate.

- Formulate and issuing any Operational Restrictions.
- Provide recommendations to ensure sufficient Authorised Persons (Pressure Systems) are appointed.
- Ensure a separate file is maintained on each Authorised Persons (Pressure Systems) detailing, locations and areas of responsibility, appointment dates, and qualifications, training certificates, refresher training, experience and general correspondence.
- Carry out regular audits of the management and control procedures for the Authorising Engineer (Pressure Systems).
- Provide technical assistance and guidance on matters relating to the application of these Safety Rules and Procedures.

#### 4.5 Authorised Person Pressure Systems (AP PS)

The Authorised Person (PS) is to be of a mature character, suitably qualified, trained and have relevant previous experience in Pressure Systems and Safe Systems of Work.

Prior to assessment by the Authorising Engineer (PS), the proposed Authorised Person (PS) is to have achieved the necessary standard of training in line with Trust approved training courses.

When suitability trained and prior to final appointment, the Authorised Person (Pressure Systems) is required to demonstrate to the satisfaction of the Authorising Engineer (Pressure Systems) the following:

- Knowledge and site familiarity of the Pressure Systems incorporated within their area of responsibility. The location and layout of the Pressure Systems, keys and arrangements for obtaining access to them.
- The location and use of all appropriate safety equipment and safety signs and arrangements for obtaining access to them. A full and thorough understanding of these Safety Rules and Procedures and any local variations within their area of responsibility.
- A general understanding of all relevant current legislation in particular the Pressure System Safety Regulations 2000 and INDG436 Safe management of industrial steam and hot water boilers.
- Ensure there are clear and accurate written instructions for safe operation of boilers and other plant and equipment installed.

On completion of training and assessment the Authorised Person (Pressure Systems) will be appointed identifying the level of Pressure System control the individual has been given.

#### Role

The Role of the Authorised Person (Pressure Systems) is to oversee and authorise all Pressure Systems work activity that takes place in accordance with the adopted Safety Rules and Procedures.

The Duty Authorised Person (Pressure Systems) is to issue all Safety Documents for the control of work in a specified Pressure System.

#### 4.6 Skilled Persons

Skilled Person (Pressure Systems) is an employee with suitable and sufficient experience and training, who has been assessed and appointed by an Authorised Person (Pressure Systems) for work on systems at the specific site.

The Skilled Person (Pressure Systems) is required to have achieved the necessary standard and must have the necessary technical knowledge, experience, and skills to enable all work on pressure systems to be undertaken safely and in such a manner, so as to minimise any risk to the lowest level possible.

Duties include but not restricted to,

- Ensure that all necessary safety equipment is available, suitable and safe for use, and in good working order. Ensure that adequate first aid and emergency arrangements are in place before commencing the work.
- Report to the Authorised Person (Pressure Systems) any accident, dangerous occurrence, defects found or incidents occurring during the work.
- Ensure that only the work carried out is that for which written instruction has been received

#### 4.7 Plant Operator(Steam)

Plant Operator (Steam Systems) is an employee with suitable and sufficient experience and training, who has been assessed and appointed by an Authorised Person (Pressure Systems) for monitoring and operating Steam systems at the specific site.

The Plant Operator (Steam Systems) is required to have achieved the necessary standard and must have the necessary technical knowledge, experience, and skills to enable safe operation of steam systems in such a manner, to minimise any risk to the lowest level possible.

Duties include but not restricted to,

- To observe, monitor and record where required combustion readings, ensuring efficient combustion of boiler plant
- Ensure all water level controls and alarms are fully functional
- To check and record where required water treatment and water quality
- To check and ensure steam systems are operated in a safe manner
- Report to the Authorised Person (Pressure Systems) any accident, dangerous occurrence, defects found or incidents occurring during the work.

### 5. Policy detail

5.1 The AP PS will set up a Document Cabinet for the documents that support the management arrangements for Pressure Systems.

These documents will include the following:

Safe Working on Pressure Systems		
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- Working pads, completed pads and stocks of:
  - Safety Programmes
  - Permits to Work
  - Standing Instructions
  - Pressure Systems Operating Records
- The Pressure Systems Document Register
- Details of the Risk Categorisation of the Systems and any additional systems required to be managed under these Safety Rules and Procedures
- Copies of all risk assessments
- Folders of Safety Programmes
- Folders of cancelled originals of Permits to Work
- Copies of Skilled Persons' appointment certificates together with the documentation which was used to support the appointment
- Copies of AE's Audit Reports
- Register of AEs, CAP and APs appointed for the Site

The Document Cabinet is to be a lockable drawer, cabinet or series of cabinets which is to be kept locked when unattended. Access is to be under the control of the APs.

### 5.2 Training

Training is one of the key elements of competence of an individual to undertake a specific task. The level of training will depend on the role to be undertaken and the prior knowledge and qualifications of the individual.

The training course content will be subject to review and / or comment by the appointed Authorising Engineer (Pressure Systems) and may be adjusted where appropriate to meet the requirements / needs of WAHT installed systems.

ROLE	TRAINING STANDARD
Authorising Engineer Pressure Systems	Must achieve the same technical training standards as for an Authorised Person PS.
Authorised Person Pressure Systems	The Pressure Systems Course will cover: <ul style="list-style-type: none"> <li>• Review of system definitions and properties</li> <li>• An overview of associated Statutory Regulations &amp; Pressure Systems Safety Regulations (PSSR)</li> <li>• Introduction to Sample NHS Foundation Trust Pressure System Safety Rules and Procedures</li> <li>• Scope of the Pressure System Safety Rules and Procedures</li> <li>• Specific roles and responsibilities of appointed personnel with respect to Pressure System Safety Rules and Procedures</li> <li>• System Categorisation and Demarcation Agreements</li> <li>• Risk Assessment</li> <li>• Isolation Methodology and HSG 253 'Safe Isolation of Plant and equipment'</li> <li>• Management, application and control of Pressure System</li> </ul>

	Safety Rules and Procedures Documentation • Audit and Monitoring
Skilled Persons	Skilled Persons (Pressure Systems) are required to have successfully undertaken technical training as determined by the AP to meet the needs of his site and the task.
Plant Operator (Steam systems) Boiler Operators Accredited Scheme (BOAS)	Covering the fundamentals of steam to the components used in steam systems and the steam/condensate cycle. The practical applications of safe and efficient boiler operation are also addressed. (1-day Steam Awareness)  Expanding on Steam Awareness, the course also covers the fundamentals of combustion, combustion control plus boiler level and blowdown controls.  A basic introduction to water treatment and best practice relating to safety management of steam and hot water boilers, as detailed by HSE guidelines INDG436 and the CEA guide BG01.

## 6. Implementation of this Key Document

The Trust Head of Estates will be responsible for the implementation of this policy. Boilers and pressure systems are situated in locked plant rooms with access strictly limited to Estates staff, who have the necessary competence and training to be aware of the Dangers from BPS systems

6.1 The policy will be made available on the Trust's intranet and website by the Head of Estates who will be responsible for issuing copies to senior operational managers for them to disseminate their departments.

6.2 The Principal Engineer / Statutory Standards Manager will be responsible for ensuring all Estate staff and Contractors read and fully understand the policy and that it is read in conjunction with the Control of Contractors Policy.

6.3 The Estates Officers will be responsible for ensuring all staff and contractors under their supervision read and fully understand the policy and that it is read in conjunction with the Control of Contractors Policy.

Aspect of compliance or effectiveness being monitored	Monitoring method	Individual responsible for the monitoring	Frequency of the monitoring activity	Individual responsible for ensuring that the actions are completed
Implementation of this Policy	Audit	Head of Estates	Annually	Director Accountable
Pressure Systems	Audit	Authorising Engineer	Annually	Head of Estates

Document Centre		Pressure Systems		
Audit Actions	Audit	Principal Engineer & Statutory Standards Manager	Annually	Head of Estates

**7. Monitoring and Compliance**

7.1 The monitoring of this policy will be via the Designated Person together with the effectiveness of the adopted SSoW via the AEBPS Audits.

7.2 The Principal Engineer / Statutory Standards Manager will ensure that any Audit actions are closed within the agreed timeframe and that adequate resource will be made available to ensure a satisfactory conclusion. Any shortfalls will be reported to the Head of Estates

## Trust Policy

Page/ Section of Key Document	Key control:	Checks to be carried out to confirm compliance with the Policy:	How often the check will be carried out:	Responsible for carrying out the check:	Results of check reported to: <i>(Responsible for also ensuring actions are developed to address any areas of non-compliance)</i>	Frequency of reporting:
	<b>WHAT?</b>	<b>HOW?</b>	<b>WHEN?</b>	<b>WHO?</b>	<b>WHERE?</b>	<b>WHEN?</b>
	Competent people managing danger	AP trained to make pressure system safe and manage pressure system day to day	AP completes refresher training every 3 years	AE assesses competence of AP	Training carried out every 3 years	AE appoints AP in writing every three years
	Permit to work System	Safety Documents issued by AP	Whenever work is done on a pressure system	AP (BPS)	At point of work before work is done	Before work is done on BPS
	AE audit	AE carries out audit of BPS against policy and safety rules	annually	AE BPS	On all BPS systems in retained estate	Annually

**8. Policy Review**

Policy will be reviewed every three years or more frequently in the light of an incident or dangerous occurrence

**9. References** [You should include external source documents and other Trust documents that are related to this Policy]

**References:**

Code:

Pressure Systems Safety Regulations 2000 .	
Health & Safety at Work Act etc1974	
Management of Health and Safety at Work Regulations 1999	
General and specific legislation relevant to the health and safety hazards associated Pressure Systems	
HSE guidelines INDG436 Safe management of industrial steam and hot water boilers	
WAHT SSOW Boilers and Pressure Systems	

**10. Background**

**10.1 Equality requirements**

Policy is a specialist Estates safety document which will have no impact on diversity or equality

**10.2 Financial risk assessment**

Policy has financial implications but as kit is a statutory requirement these cost implications are non negotiable

**10.3 Consultation**

The document is issued for comment to Trust Estates Officers, Trust AE / APs BPS, Trust Health and Safety committee

**Contribution List**

This key document has been circulated to the following individuals for consultation;

Designation
Director of Estates and Facilities
Deputy Director of Estates
Head of Estates
Estates Officer KTC / AHR
Assistant Estates Officer KTC / AHR
BPS APs
Trust Health & Safety Manager

This key document has been circulated to the chair(s) of the following committees / groups for comments;

Committee
Health and Safety Committee
Trust Management Group

**10.4 Approval Process**

Policy written by Head of Estates, submitted to AE for comment, submitted to estates management team for comment, all comments collated and reviewed, document then submitted to Health and Safety committee for comment and ratified by Trust Management Group

**10.5 Version Control**

This section should contain a list of key amendments made to this document each time it is reviewed.

Date	Amendment	By:

**Supporting Document 1 – Equality Impact Assessment form**

To be completed by the key document author and included as an appendix to key document when submitted to the appropriate committee for consideration and approval.



**Herefordshire & Worcestershire STP - Equality Impact Assessment (EIA) Form**  
 Please read EIA guidelines when completing this form

**Section 1 - Name of Organisation** (please tick)

Herefordshire & Worcestershire STP	<input type="checkbox"/>	Herefordshire Council	<input type="checkbox"/>	Herefordshire CCG	<input type="checkbox"/>
Worcestershire Acute Hospitals NHS Trust	<input checked="" type="checkbox"/>	Worcestershire County Council	<input type="checkbox"/>	Worcestershire CCGs	<input type="checkbox"/>
Worcestershire Health and Care NHS Trust	<input type="checkbox"/>	Wye Valley NHS Trust	<input type="checkbox"/>	Other (please state)	<input type="checkbox"/>

<b>Name of Lead for Activity</b>	<b>Simon Noon</b>
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<b>Details of individuals completing this assessment</b>	<b>Name</b>	<b>Job title</b>	<b>e-mail contact</b>
	Simon Noon	Principal Engineer	simon.noon@nhs.net
<b>Date assessment completed</b>	<b>02/12/2021</b>		

**Section 2**

Activity being assessed (e.g. policy/procedure, document, service redesign, policy, strategy etc.)	<b>Title: Boiler &amp; Pressure Systems Policy</b>
What is the aim, purpose and/or intended outcomes of this Activity?	To ensure the Trust is managing Pressure Systems in accordance with all principles of law and relevant guidance and is managing any danger through a safe system of work

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Who will be affected by the development & implementation of this activity?	<input checked="" type="checkbox"/> Service User <input checked="" type="checkbox"/> Patient <input checked="" type="checkbox"/> Carers <input checked="" type="checkbox"/> Visitors	<input checked="" type="checkbox"/> Staff <input checked="" type="checkbox"/> Communities <input type="checkbox"/> Other _____
Is this:	<input checked="" type="checkbox"/> Review of an existing activity <input type="checkbox"/> New activity <input type="checkbox"/> Planning to withdraw or reduce a service, activity or presence?	
What information and evidence have you reviewed to help inform this assessment? (Please name sources, eg demographic information for patients / services / staff groups affected, complaints etc.)	This is a Technical policy which we have written in consultation with the various technical standards, ACOPs, HTMs.	
Summary of engagement or consultation undertaken (e.g. who and how have you engaged with, or why do you believe this is not required)	We have consulted our Authorising Engineer BPS) We have bought this for peer review at the Health & Safety Committee	
Summary of relevant findings	The policy has been deemed fit for purpose	

### Section 3

Please consider the potential impact of this activity (during development & implementation) on each of the equality groups outlined below. **Please tick one or more impact box below for each Equality Group and explain your rationale.** Please note it is possible for the potential impact to be both positive and negative within the same equality group and this should be recorded. Remember to consider the impact on e.g. staff, public, patients, carers etc. in these equality groups.

Equality Group	Potential <u>positive</u> impact	Potential <u>neutral</u> impact	Potential <u>negative</u> impact	Please explain your reasons for any potential positive, neutral or negative impact identified
Age			✓	Having a policy to ensure the Trust systems are Pressure systems safe, compliant and we have a Safe System of work in place to control danger cannot be anything than a benefit to all
Disability			✓	Having a policy to ensure the Trust systems are Pressure systems safe, compliant and we have a Safe System of work in place to control danger cannot be anything than a benefit to all
Gender Reassignment			✓	Having a policy to ensure the Trust systems are Pressure systems safe, compliant and we have a Safe System of work in place to control danger cannot be anything than a benefit to all
Marriage & Civil Partnerships			✓	Having a policy to ensure the Trust systems are Pressure systems safe, compliant and we have a Safe System of work in place to control danger cannot be anything than a benefit to all
Pregnancy & Maternity			✓	Having a policy to ensure the Trust systems are Pressure systems safe, compliant and we have a Safe System of work in place to control danger cannot be anything than a benefit to all

## Trust Policy

Equality Group	Potential <u>positive</u> impact	Potential <u>neutral</u> impact	Potential <u>negative</u> impact	Please explain your reasons for any potential positive, neutral or negative impact identified
<b>Race including Traveling Communities</b>			✓	Having a policy to ensure the Trust systems are Pressure systems safe, compliant and we have a Safe System of work in place to control danger cannot be anything than a benefit to all
<b>Religion &amp; Belief</b>			✓	Having a policy to ensure the Trust systems are Pressure systems safe, compliant and we have a Safe System of work in place to control danger cannot be anything than a benefit to all
<b>Sex</b>			✓	Having a policy to ensure the Trust systems are Pressure systems safe, compliant and we have a Safe System of work in place to control danger cannot be anything than a benefit to all
<b>Sexual Orientation</b>			✓	Having a policy to ensure the Trust systems are Pressure systems safe, compliant and we have a Safe System of work in place to control danger cannot be anything than a benefit to all
<b>Other Vulnerable and Disadvantaged Groups</b> (e.g. carers; care leavers; homeless; Social/Economic deprivation, travelling communities etc.)			✓	Having a policy to ensure the Trust systems are Pressure systems safe, compliant and we have a Safe System of work in place to control danger cannot be anything than a benefit to all
<b>Health Inequalities</b> (any preventable, unfair & unjust differences in health status between groups, populations or individuals that arise from the unequal distribution of social, environmental & economic conditions within societies)			✓	Having a policy to ensure the Trust systems are Pressure systems safe, compliant and we have a Safe System of work in place to control danger cannot be anything than a benefit to all

### Section 4

What actions will you take to mitigate any potential negative impacts?	Risk identified	Actions required to reduce / eliminate negative impact	Who will lead on the action?	Timeframe
	None			
	None			
<b>How will you monitor these actions?</b>	N/A			

<b>When will you review this EIA?</b> (e.g in a service redesign, this EIA should be revisited regularly throughout the design & implementation)	<b>When policy is reviewed</b>
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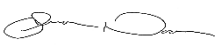

**Section 5** - Please read and agree to the following Equality Statement

**1. Equality Statement**

1.1. All public bodies have a statutory duty under the Equality Act 2010 to set out arrangements to assess and consult on how their policies and functions impact on the 9 protected characteristics: Age; Disability; Gender Reassignment; Marriage & Civil Partnership; Pregnancy & Maternity; Race; Religion & Belief; Sex; Sexual Orientation

1.2. Our Organisations will challenge discrimination, promote equality, respect human rights, and aims to design and implement services, policies and measures that meet the diverse needs of our service, and population, ensuring that none are placed at a disadvantage over others.

1.3. All staff are expected to deliver services and provide services and care in a manner which respects the individuality of service users, patients, carer’s etc, and as such treat them and members of the workforce respectfully, paying due regard to the 9 protected characteristics.

<b>Signature of person completing EIA</b>	
<b>Date signed</b>	02/12/2021
<b>Comments:</b>	
<b>Signature of person the Leader Person for this activity</b>	
<b>Date signed</b>	02/12/2021
<b>Comments:</b>	



## Supporting Document 2 – Financial Impact Assessment

To be completed by the key document author and attached to key document when submitted to the appropriate committee for consideration and approval.

	<b>Title of document:</b>	<b>Yes/No</b>
1.	Does the implementation of this document require any additional Capital resources	No
2.	Does the implementation of this document require additional revenue	Yes
3.	Does the implementation of this document require additional manpower	No
4.	Does the implementation of this document release any manpower costs through a change in practice	No
5.	Are there additional staff training costs associated with implementing this document which cannot be delivered through current training programmes or allocated training times for staff	Yes
	Other comments:	

If the response to any of the above is yes, please complete a business case and which is signed by your Finance Manager and Directorate Manager for consideration by the Accountable Director before progressing to the relevant committee for approval