

# INTEGRATED IDENTITY MANAGEMENT (IIM) PROCESS POLICY

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	<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 wide	
<b>Target staff categories</b>	Registration Authority (RA) staff; staff administering the workforce, recruitment, payroll and HR functions on ESR; Informatics and Information Governance personnel; smartcard users.	

## Policy Overview

The purpose of this document is to outline the agreed working practices required to support the Electronic Staff Record (ESR) interface to the User Identity Manager (UIM) software used to provide the electronic management of access control. UIM has replaced the paper based registration process. The document also provides guidance to ensure that relevant applications continue to be operated securely and efficiently through future developments.

The document is not intended to be an exhaustive review of all HR/RA processes and procedures but rather will focus on the key processes for issuing NHS Care Records Service (NCRS) Smartcards. Depending on the role assigned, an NCRS Smartcard can give a user access to the NHS Care Record Service or other National Programme for IT applications such as Choose and Book.

The policy will be of primary interest to those staff working within the Registration Authority (RA) function of the Trust and on the workforce, recruitment, payroll and HR functions of ESR. It will also be of interest to managers requiring smartcards for their teams and IT and Information Governance personnel.

## Key amendments:

Date	Amendment	By:
06/08/2015	Document extended for 12 months as per TMC paper approved on 22 <sup>nd</sup> July 2015	TMC
14/11/16	Further extension as per TMC 22 <sup>nd</sup> July 2015	TMC
December 2017	Document extended for 3 months as per TLG recommendation	TLG
March 2018	Document extended for 3 months as approved by TLG	TLG
June 2018	Document extended for 3 months as per TLG recommendation	TLG
February 2020	Document extended for 3 months whilst approval process is completed	David Chamberlain
May 2020	Document extended for 6 months during COVID-19 period	

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## 1 Introduction

**1.1** From April 2008, NHS Employment Check Standards became a requirement in the NHS as part of the annual health check. Similarly, robust identity checks were also enforced using the same identity management standards carried out by an NHS organisation's Registration Authority (RA) to verify an individual's identity before allowing access to NHS Care Records Service (NHS CRS) applications. Details of the requirements are given in the in the NHS Employers publication *Verification of identity checks*

<http://www.nhsemployers.org/Aboutus/Publications/Documents/Verification%20of%20identity%20checks.pdf>

Combining these two parallel activities into a single **Integrated Identity Management (IIM)** process has been shown to deliver significant benefits through HR/RA process integration and the move to Position Based Access Control (PBAC).

**1.2 ESR-UIM Interface** can be used to link staff records in ESR to user records in NHS CRS in order to remove duplication and to drive access control based on the job that a person holds. HR functions currently update ESR when changes are made regarding an employee's assignment to an established ESR position. Where this position is linked to an NHS CRS Access Control Position, the ESR interface will be triggered by such changes and will automatically update an individual's access rights to NHS CRS compliant systems to reflect the requirements of their new position or status.

**1.3** Based on the significant benefits and improved Governance that could be achieved, Worcestershire Acute Hospitals Trust elected to implement the ESR-UIM Interface which was activated on 27/02/2012 alongside UIM. To realise further benefits the Trust has reviewed processes/procedures and explored integration opportunities, for both directly and externally employed staff. Process details are given in the appendices.

**1.4** The main benefits are:

- Efficiency savings
  - The achievement of a paperless system for smartcard registration
- Improved governance
  - Automatic cancellation of NCRS access on leaving employment

- Online signature of terms and conditions
- Standard positions allocated for job roles through ESR

1.5 The policy is compatible with the Registration Authorities Process Guidance document <http://nww.hscic.gov.uk/iim/documents/guide.pdf> and the Registration Authorities Operating Guidance 2013/14 <http://systems.hscic.gov.uk/rasmartcards/opguid.pdf>.

## 2. Scope of the Policy

2.1 This policy applies to all employees and external contractors who require smartcards.

2.1 It is particularly relevant for staff working within the Registration Authority (RA) function of the Trust and on the workforce, recruitment, payroll and HR functions of ESR. It will also be of interest to managers requiring smartcards for their teams and IT and Information Governance personnel.

2.2 The document is not intended to be an exhaustive review of all HR/RA processes and procedures but rather will focus on the key processes for issuing NHS Care Records Service (NCRS) Smartcards.

2.3 Currently, Worcestershire Acute Hospitals NHS Trust uses NCRS Smartcards for access to the following systems:

- ESR Manager/Supervisor Self Service
- ESR e-learning
- UAG (remote access)
- Choose & Book
- Summary Care Record
- TPP SystemOne
- Hospedia (for EZNotes)

## 3 Definitions

### 3.1 Access Control Position (ACP)

An ACP contains a set of access rights that have been approved and granted through the RA process.

### 3.2 E-GIF Level 3

Security standards for access to government systems.

### 3.3 Electronic Staff Record (ESR)

The electronic human resources management system used by the majority of organisations within the NHS.

### 3.4 Integrated Identity Management (IIM)

The development of closer integration between ESR and the NCRS.

### 3.5 NHS Care Records Service (NCRS or NHS CRS)

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National IT system developed to store patient records and link information between organisations.

### 3.6 NHS CRS Smartcard

A plastic card containing an electronic chip that is used to access the NCRS and other NHS IT applications, along with a passcode. The chip does not contain any personal information.

### 3.7 Position Based Access Control (PBAC)

The PBAC concept groups access control requirements by job role allowing any number of employees to share generic access rights based on what they do rather than who they are. The positions can be associated with ESR positions thus enabling the inheritance of access rights via the ESR position that the employee is assigned to.

### 3.8 Registration Authority (RA)

The organisational structure within an NHS organisation that is responsible for registering and verifying the identity of health care professionals/workers who need access to the NHS Care Records Service or other NHS IT application. Staff need to prove their identity and have their application approved by a sponsor (usually their line manager) before being issued with a smartcard by the RA. The RA grants them an approved level of access. This process is essential to protect the security and confidentiality of the systems. The Executive Management Team of the NHS organisation should embed governance of their RA in the information governance and performance management framework.

#### 3.8.1 RA Agent

RA Agents work under the direction of the RA Manager to administer the RA function. They are responsible for performing registration and maintenance of sponsors and users in their organisation following national and local RA processes.

#### 3.8.2 RA Manager

Manages the RA service provision and operation to meet the needs of an organisation and all its users. The RA manager is also responsible for briefing and registering RA agents.

#### 3.8.3 RA Sponsor

An individual who has been appointed to approve access to information and functionality of the NHS CR and other IT systems by granting approval of appropriate RBAC codes so that staff have appropriate access based on their job role. Sponsors approve access and the issue of smartcards and are usually the line manager of users.

#### 3.8.4 RA Workbench

A form within ESR to manage RA related activities for employees.

### 3.9 Role Based Access Control (RBAC)

A national standard set of job roles and related activities and areas of work which can be approved by a sponsor and granted by the RA to a user.

### 3.10 User Identity Manager (UIM)

UIM is the registration software managing access control to NHS CRS systems. UIM uses electronic forms and digital signatures thereby removing the need for paper based workflow. Access control in UIM is facilitated using NHS CRS Access Control Positions (ACP) defined by the PBAC methodology.

### 3.11 User's Unique Identifier (UUID)

The UUID is randomly applied on registration of users in UIM. It is displayed under the photo on the smartcard. The number is also held against employee records in ESR to validate that the employee has an active entry on NHS CRS.

### 3.12 Further definitions are given in the *Glossary of Terms* at

<http://www.hscic.gov.uk/iim/documents/raglossaryterms.pdf>.

## 4. Responsibility and Duties

### 4.1 Executive Directors

Overall responsibility for this policy rests with the Trust Board. The lead Executive Director will be the Director of Human Resources and Organisational Development who has responsibility for ensuring that:

- The policy is implemented and operated effectively
- An audit trail is maintained
- All staff involved with the administration of IIM are aware of the policy and the procedures that apply to them.

### 4.2 Line Managers

Managers are responsible for informing the RA Manager via email appropriate personal details for members of staff who require smartcard access in the course of their duties.

### 4.3 Registration Authority and ESR Staff

RA and ESR staff are responsible for the administration of IIM following the policies and procedures as detailed in this policy and the accompanying appendices.

### 4.4 Employees

Those employees who are deemed by their line manager to require a smartcard must:

- Provide the correct identity documents as defined as eGIF3
- Undertake to observe the agreed terms and conditions and electronically sign this declaration when their card is issued (Appendix C).

### 4.5 External Contractors

External contractors to the Trust who require access to systems accessed by smartcard will need to abide by the same terms and conditions as employees. Their application must be sponsored by a senior manager employed by the Trust.

## 5 Policy Detail: Registration Processes

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## 5.1 ESR-UIM Interface Processes

Worcestershire Acute Hospitals NHS Trust operates a fully integrated process in that the Registration Authority function is encompassed within the HR Directorate.

### 5.1.1 Process for Worcestershire Acute Hospitals NHS Trust Employees

All staff need to have an ID Check completed to e-Gif Level 3 Standard prior to being issued with a smartcard.

If a member of staff is required by their line manager to have a smartcard, the line manager will inform the RA Manager of the person's full name and job title, with the reason they require a smartcard, via email. This information is archived in the RA transactions log which is accessible only to RA and ESR staff.

The person will then be invited by an RA Agent to bring their ID documents to the Trust library most convenient for them. Their ID information will be checked by RA staff in accordance with eGIF level 3 standard as described in the NHS Employers publication *Verification of identity checks*.

The Workforce Transformation team will pick up this information from the RA transactions log and assign their linked ESR position. This will ensure that the relevant NHS CRS access is assigned to them. RA staff will then complete the process of printing and issuing a card and associating the UIM record back to ESR through the RA Workbench. The person will then be invited back to collect the card and sign the terms and conditions.

In the case of ESR access (either for e-learning or manager self-service) the request will be made to the Workforce Transformation team via a completed ESR4 form, and they will enter the request in the RA transactions log if a smartcard is required.

### 5.1.2 New starters with smartcards issued by other Trusts

Increasingly new starters previously employed by the NHS will already have been issued with a smartcard. In this case, the line manager will enter the new starter's UUID when requesting a smartcard. Once the ID checks have been completed by the RA Agent and the card checked that the photograph is still a good likeness, the record can be associated with ESR and the old card can be used. If the person's appearance no longer matches the photograph on the card a replacement card will be issued.

### 5.1.3 Personal Details Changes

The ESR system automatically informs UIM of any personal detail changes, ensuring that the data is kept up to date in UIM and consistent with ESR.

*Note: The personal details that are synchronised between ESR and UIM are as follows:*

- Title
- Surname
- First name
- Middle name
- NI Number
- Date of Birth
- Email address (Person Form)
- Work phone number (Phones Form)

Work mobile number (Phones Form)  
Preferred name

## 5.1.5 Addition and Revocation of NHS CRS Access

When a Worcestershire Acute Hospitals NHS Trust member of staff is assigned a new ESR position that is linked to an Access Control Position (ACP) then this person will have immediate access to the NHS CRS Systems as defined in the new ACP. If there is no linked ACP then access will be removed and access control reverts to UIM. The RA Agent will then need to be contacted to assign the correct position in UIM.

Where a Trust member of staff is assigned an ESR position linked to a NHS CRS Access Control Position and has their assignment status changed to an 'inactive' status in ESR, a message is sent to UIM via the interface to remove access to NHS CRS applications.

## 5.1.6 External Shared Services Staff

External shared services staff include members of staff not directly employed by the Trust who assist in various elements of ESR including payroll, bulk updates of data and transfer of staff.

As these staff are not assigned to an ESR Position they cannot have their NHS CRS access for Worcestershire Acute Hospitals NHS Trust controlled using the ESR-UIM Interface. However, they still require their Smartcard UUID to be entered into ESR to ensure that they can use their Smartcard to access Worcestershire Acute Hospitals NHS Trust's Virtual Private Database (VPD).

This requires ID checks to be recorded in ESR for the user and the 'association' to be completed using the RA Workbench rather than the ESR record as per an employee of Worcestershire Acute Hospitals NHS Trust. This process ensures that the ESR person details are used to generate the NHS CRS user record therefore eliminating unnecessary duplication.

## 5.2 UIM-only Processes

UIM is used for managing NHS CRS System access for non-employees. These can be contractors (eg Health Records staff employed by Xerox) or employees of other NHS Trusts (eg Worcestershire Health & Care Trust staff who require access to Worcestershire Acute Hospitals NHS Trust systems such as Choose & Book).

### 5.2.1 Contractors

The contractor's line manager within Worcestershire Acute Hospitals NHS Trust will enter a request through the RA intranet page giving the name and address of the person, their job title, the reason they need access and the end date of their contract. They will then be requested to complete RA01 and RA02 forms. The request will also be recorded in the RA transactions log, and an appointment agreed with the new starter who will attend a face to face meeting with the RA staff and produce their ID documentation.

The RA Staff will then verify the person's ID and enter the relevant information into the transactions log and take a photograph of the user. RA staff will then

add the details in UIM and print and issue the card, with the user electronically signing the terms and conditions. The card will be set to expire at the end date of the contract, or in 3 months if there is any doubt.

### 5.2.2. Employees of another Trust requiring access to Acute Trust systems

A Worcestershire Acute Hospitals NHS Trust manager will enter a request through the RA intranet page giving the name and address of the person, their job title, the reason they need access and the end date (if known). They will then be requested to complete RA01 and RA02 forms which will be archived. The request will also be recorded in the RA transactions log, and an appointment agreed with the new starter who will attend a face to face meeting with the RA staff and produce their ID documentation.

### 5.2.3 Leavers

Revoking NHS CRS access outside of ESR is dependent upon the line manager of individuals requiring the revocation notifying RA staff. When RA staff are notified of a leaver the transaction log will be updated and the NHS CRS access revoked immediately. The time limited profile initially assigned will also ensure that access is revoked in the event of RA not being notified of the leaver.

## 6. Policy Detail: UIM Positions Setup and Maintenance

### 6.1 Position Based Access Control (PBAC)

Worcestershire Acute Hospitals NHS Trust has reviewed all of the NHS CRS Access used within the organisation and has developed the Access Control Positions using a 'bottom up' approach based on these findings.

Access Control Positions (ACPs) will be reviewed either on an ad-hoc basis when a request has been made or annually to ensure that the current requirements are still valid. Any adjustments will be processed using the relevant options below.

For more information on PBAC please refer to the Position Based Access Control (PBAC) toolkit <http://www.hscic.gov.uk/iim/documents/pbactoolkit.pdf>.

### 6.2 Changes to Access Control Positions

Any change will need to be approved by the Workforce and Organisational Development Group, or if urgent, by the Information Governance Manager, before the amendment is made to the ACP.

In granting new ACPs, the RA Manager will have regard to the National RBAC Database (see <http://www.hscic.gov.uk/iim/documents/nrbacdataguide.pdf> and <http://www.connectingforhealth.nhs.uk/iim/ra/rbac/nrd>.)

When new ACPs are identified the Registration Authority Manager in conjunction with the Sponsor will need to determine who requires this access and ensure that the ESR PBAC Master Mapping Table is updated before it is submitted for authorisation and approval.

Upon receiving authorisation the ACP(s) will be created, approved and granted in UIM before being downloaded into ESR.

## 7. Implementation

With the implementation of the ESR-UIM Interface, Worcestershire Acute Hospitals NHS Trust has been able to move to a largely paperless system and reduce duplication.

This policy document outlines the procedures involved in smartcard registration, and implementation of the policy will enable clearer understanding of processes and requirements.

### 7.1 Dissemination

The policy will be placed in the Trust's HR document library and linked to the RA intranet pages. It will be publicised through the Trust Daily Brief.

### 7.2 Training

#### 7.2.1 UIM Training

The RA Manager will ensure that appropriate training is completed by everyone that has a requirement to access UIM and that this is recorded. Training material is available on the HSCIC website at <http://nww.hscic.gov.uk/iim/documents>.

#### 7.2.2 ESR Training

Training in the use of the RA Workbench for associating CRS records is available as a module on the NLMS Oracle Learning Management System. This must be completed by those RA Agents who have responsibility for this action.

## 8. Monitoring and Compliance

The RA transactions log and RA staff training records will be regularly monitored and available for audit. Quarterly reports will be submitted to the Trust's Workforce and Organisational Development Group matching performance with nationally recommended standards.

## 9. Policy Review

The Workforce and Organisational Development Group will review this policy annually, or more frequently if required.

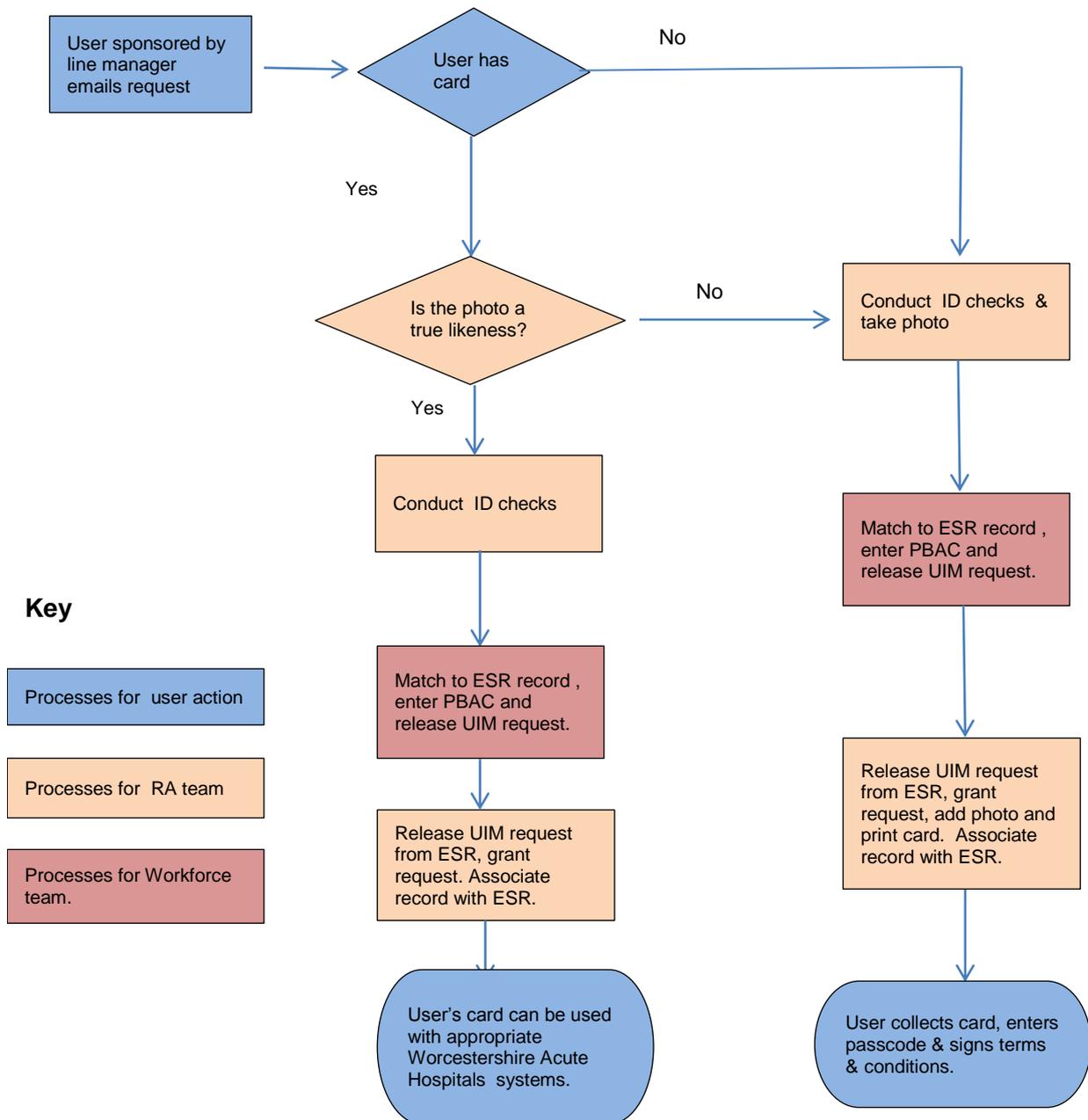
## 10. References

Document	URL
Glossary of Terms	<a href="http://nww.hscic.gov.uk/iim/documents/raglossaryterms.pdf">http://nww.hscic.gov.uk/iim/documents/raglossaryterms.pdf</a>

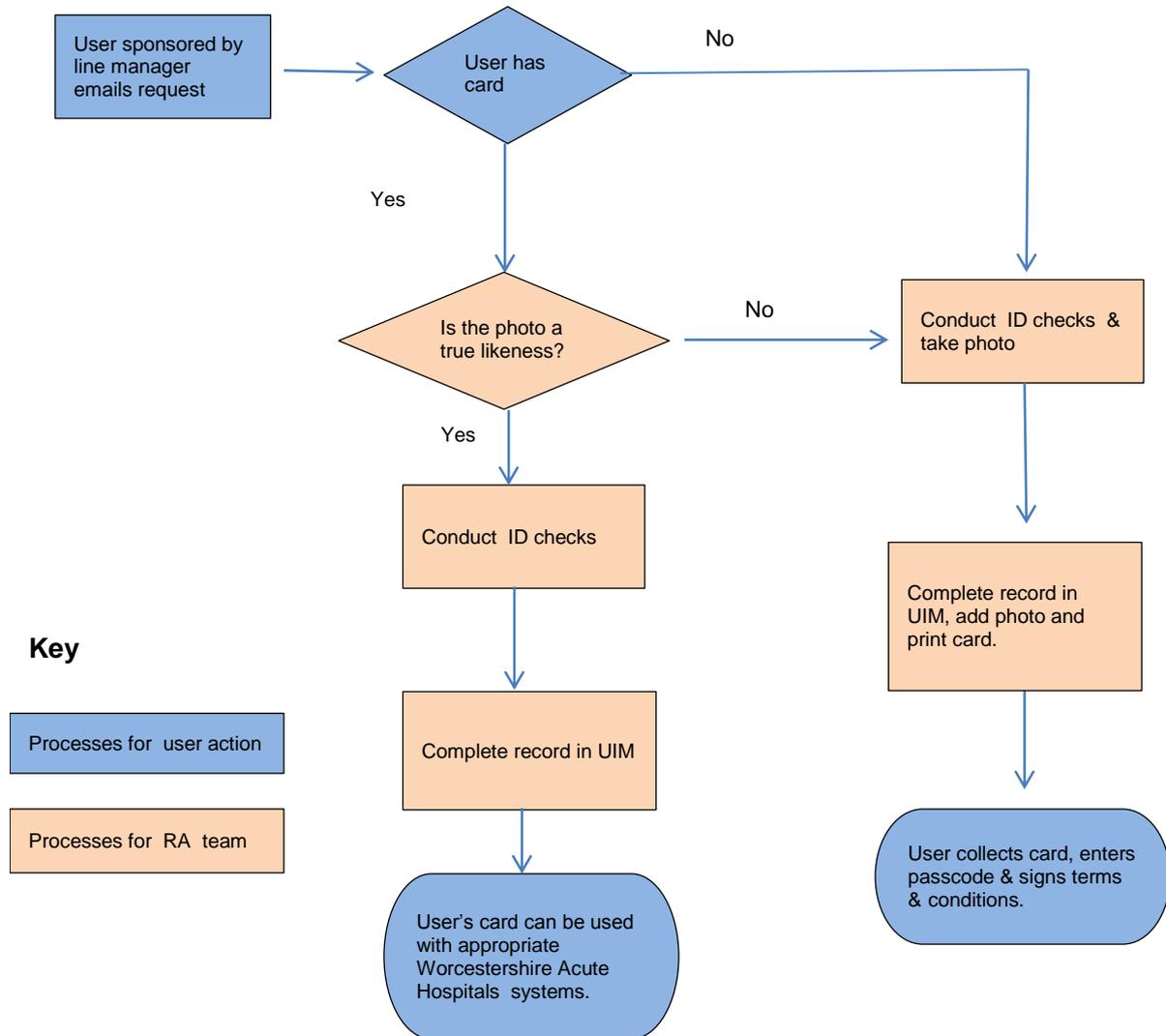
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National RBAC Database	<a href="http://nww.connectingforhealth.nhs.uk/iim/ra/rbac/nrd">http://nww.connectingforhealth.nhs.uk/iim/ra/rbac/nrd</a>
National RBAC Database User Guide	<a href="http://nww.hscic.gov.uk/iim/documents/nrbacdataguide.pdf">http://nww.hscic.gov.uk/iim/documents/nrbacdataguide.pdf</a>
PBAC Toolkit	<a href="http://nww.hscic.gov.uk/iim/documents/pbactoolkit.pdf">http://nww.hscic.gov.uk/iim/documents/pbactoolkit.pdf</a>
Registration Authorities Operating Guidance 2013/2014	<a href="http://systems.hscic.gov.uk/rasmartcards/opguid.pdf">http://systems.hscic.gov.uk/rasmartcards/opguid.pdf</a>
Registration Authorities Process Guidance	<a href="http://nww.hscic.gov.uk/iim/documents/guide.pdf">http://nww.hscic.gov.uk/iim/documents/guide.pdf</a>
Registration Authorities Training Modules	<a href="http://nww.hscic.gov.uk/iim/documents">http://nww.hscic.gov.uk/iim/documents</a>
Verification of Identity Checks	<a href="http://www.nhsemployers.org/Aboutus/Publications/Documents/Verification%20of%20identity%20checks.pdf">http://www.nhsemployers.org/Aboutus/Publications/Documents/Verification%20of%20identity%20checks.pdf</a>

## Appendix A: Registration Process for Worcestershire Acute Hospitals Employee



## Appendix B: Registration Process for External Users



## Appendix C

## NHS Care Records Service Smartcard Terms and Conditions V1.0b 1<sup>st</sup> January 2010

### Notice to applicants on the collection of personal data

In accordance with the requirements of Department of Health, the personal data (as defined in the Data Protection Act 1998) that the applicant provided as part of the application process to access NHS CRS together with any personal data processed in relation to the applicant in support of their application is collected for the purpose of identifying the applicant and processing this application and evaluating the applicant for suitability as an authorised user; if accepted, to generate a personalised certificate and Smartcard for the authorised user and for the purpose of managing the applicant's use of any NHS Care Records Service applications or applications that utilise NHS Care Records Service authentication.

In particular, this personal data will be used to validate and verify the applicant's identity to ensure that the applicant is correctly identified and appropriately authorised for access. The personal data in relation to the applicant will be processed by local Registration Authority/Authorities and may be shared with other Registration Authorities for the purpose of processing this application, in accordance with the requirements of the Data Protection Act 1998 as amended and supplemented from time to time. This personal data may also be used to ensure that accurate information can be recorded regarding the applicant's use of systems.

In accordance with the Data Protection Act 1998, this personal data will neither be used nor disclosed for any other purpose other than where required by law, and will be retained in accordance with the Registration Authority's data retention policy. It is the applicant's responsibility to ensure that their registered name is accurate and kept up-to-date. The applicant may contact their local Registration Authority or Sponsor in relation to any queries they may have in connection with this application.

### By signing this declaration I, the applicant:

1. consent to the use of my personal data in the manner described in the "Notice to applicants on the collection of personal data" above. I also agree to provide any additional information and documentation required by the Registration Authority in order to verify my identity;
2. confirm that the information which I provide in the process of my application is accurate. I agree to notify my local Registration Authority immediately of any changes to this information;
3. agree that the Smartcard issued to me is the property of the NHS and I agree to use it only in the normal course of my employment or contract arrangement;
4. agree that I will check the operation of my Smartcard promptly after I receive it. This will ensure that I have been granted the correct access profiles. I also agree to notify my local Registration Authority promptly if I become aware of any problem with my Smartcard or my access profiles;
5. acknowledge that I will keep my Smartcard private and secure and that I will not permit anybody

else to use it or any session established with the NHS Care Records Service applications. I will not share my Passcodes with any other user. I will not make any electronic or written copies of my Passcodes (this includes function keys). I will take all reasonable steps to Smartcard. If I lose my Smartcard or if I suspect that it has been stolen or used by a third party I will report this to my local Registration Authority as soon as possible;

6. agree that I will only use my Smartcard, the NHS Care Records Service applications and all patient data in accordance with The NHS Confidentiality Code of Practice ([www.dh.gov.uk](http://www.dh.gov.uk) site) and (where applicable) in accordance with my contract of employment or contract of provision for service (which ever is appropriate) and with any instructions relating to the NHS Care Records Service applications which are notified to me;
7. agree not to maliciously alter, neutralise, circumvent, tamper with or manipulate my Smartcard, NHS Care Records Service applications components or any access profiles given to me;
8. agree not to deliberately corrupt, invalidate, deface, damage or otherwise misuse any NHS Care Records Service applications or information stored by them. This includes but is not limited to the introduction of computer viruses or other malicious software that may cause disruption to the services or breaches in confidentiality;
9. acknowledge that my Smartcard may be revoked or my access profiles changed at any time without notice if I breach this Agreement; if I breach any guidance or instructions notified to me for the use of the NHS Care Records Service applications or if such revocation or change is necessary as a security precaution. I acknowledge that if I breach this Agreement this may be brought to the attention of my employer (or governing body in relation to independent contractors) who may then take appropriate action (including disciplinary proceedings and/or criminal prosecution);
10. agree that the Registration Authority's sole responsibility is for the administration of access profiles and the issue of Smartcards for the NHS Care Records Service applications. The Registration Authority is not responsible for the availability of the NHS Care Records Service applications or applications which use NHS Care Records Service authentication or the accuracy of any patient data;
11. acknowledge that I, or my employer, shall notify my local Registration Authority at any time should either wish to terminate this Agreement and to have my Smartcard revoked e.g. on cessation of my employment or contractual arrangement with health care organisations or other relevant change in my job role; and
12. acknowledge that these terms and conditions form a binding Agreement between myself and those organisations who have sponsored my role(s). I agree that this Agreement is governed by English law and that the English courts shall settle any dispute under this Agreement.

## Supporting Document 1 - Equality Impact Assessment Tool

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

If you have identified a potential discriminatory impact of this key document, please refer it to Assistant Manager of Human Resources, together with any suggestions as to the action required to avoid/reduce this impact.

**Supporting Document 2 – Financial Impact Assessment**

	<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	No
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	No
	Other comments:	