

AGENDA MANAGEMENT SHEET

Report Title:	Additional resource for food inspections
Name of Committee:	Cabinet
Date of Meeting:	8 April 2025
Report Director:	Chief Officer - Regulation and Safety
Portfolio:	Communities and Homes, Regulation and Safety
Ward Relevance:	All
Prior Consultation:	Portfolio holder, Lib Dem Representative
Contact Officer:	Paul Pritchett, Environmental Health and Community Safety Manager
Public or Private:	Public
Report Subject to Call-In:	Yes
Report En-Bloc:	No
Forward Plan:	No
Corporate Priorities:	<p>This report relates to the following priority(ies):</p> <p><input checked="" type="checkbox"/> A Healthier Rugby – To support people to live healthier, longer, and more independent lives.</p> <p><input type="checkbox"/> A Thriving Rugby – To deliver a thriving economy which brings Borough-wide investment and regenerates Rugby Town Centre.</p> <p><input type="checkbox"/> A Greener Rugby – To protect the environment and ensure the Borough adapts to climate change.</p> <p><input type="checkbox"/> A Fairer Rugby – To reduce inequalities and improve housing across the Borough.</p> <p>Corporate Strategy 2025-2035</p> <p><input type="checkbox"/> This report does not specifically relate to any Council priorities but</p>
Summary:	<p>The Food Standards Agency (FSA) is the national regulator for food inspections and set the policies for them. We are currently unable to meet the required number of inspections and additional resource is needed to meet our statutory obligation.</p>

Financial Implications:	1 – year estimated cost of £47,920. A review is also planned to ensure we meet targets in future years.
Risk Management/Health and Safety Implications:	Inspecting food premises in accordance with FSA guidance is a legal requirement.
Environmental Implications:	None. See Appendix 2.
Legal Implications:	Failure to comply with the food legislation including the European Communities Act 1972 (as transferred to UK legislation) and the Food Safety Act 1990 can result in the FSA appointing another authority to carry out the inspections with the Council funding that authority.
Equality and Diversity:	None. See Appendix 3.
Options:	<ul style="list-style-type: none"> (1) Fund a 1-year project to bring the inspections into compliance with FSA guidance. (2) Not support the project and risk further formal action from the FSA.
Recommendation:	A supplementary revenue budget of £47,920 to implement the FSA approved project plan.
Reasons for Recommendation:	To meet the Council's statutory obligations under food legislation for inspections of food premises.

Cabinet - 8 April 2025

Additional resource for food inspections

Public Report of the Chief Officer - Regulation and Safety

Recommendation

A supplementary revenue budget of £47,920 to implement the FSA approved project plan.

1. Executive Summary

- 1.1 The Council is the local competent authority for the implementation of food safety legislation, including food inspections.
- 1.2 The Food Standards Agency (FSA) is the national competent authority for food and issues statutory guidance the council is required to comply with, including a risk-based system for determining when inspections have to be carried out.
- 1.3 A number of factors has resulted in criticism from the FSA regarding compliance with the risk-based inspection scheme and have advised the council that they expect compliance within 12 months.
- 1.4 An action plan has been agreed with the FSA, but this requires additional resources to meet the FSA requirements.
- 1.5 To implement that action plan we need to employ external contractors at a cost of £47,920.
- 1.6 Cabinet is requested to approve the expenditure.

2. Introduction

- 2.1 The Council is required to carry out inspections of food premises to determine if they are safe for the public to use. A risk-based system is used, with A being the highest risk premises (due to poor controls or high risk activities such as catering for vulnerable people) and typically inspected twice per year, and E (typically packaged food sales) being the lowest risk and requiring intervention (the action depends on a number of factors, but can include phone calls, visits, questionnaires or inspections) every 3 years.
- 2.2 Details of the statutory guidance councils are required to comply with can be found in the list of background papers.

- 2.3 The Council is currently failing to meet the objectives and has had to report this to the FSA as the regulator. Officers have met the FSA and have completed an action plan which the FSA have considered and approved (Background papers and Appendix 1).
- 2.4 The FSA have the power as the national competent authority to take the responsibility from a council and appoint another council to carry out the inspections. This would be at the expense of Rugby Borough Council and as it would involve staff from another authority in another area, those costs could be significant.
- 2.5 There have been a number of issues which have resulted in the current position. At present the number of food officers is 2.5 full time equivalent (1.7 fully competent) for approximately 1,000 premises. The FSA guidance for this is around 3.5 fte. These issues have included (1) a backlog from the COVID-19 pandemic when staff were diverted away from food inspections and there were restrictions on inspections; (2) the loss of a full time food officer in 2021 as the result of a corporate restructure; (3) difficulty in recruiting a qualified food officer (reasons for this include budget reductions for many years so training is now limited and competition from higher paying local authorities) so the Council had to employ a partially trained food officer which under FSA guidance limits what they can inspect; (4) a new software system which has caused a number of issues in the team; (5) the resignation of the team manager resulted in a temporary loss of support and expertise; and (6) an estimated increase in numbers of food premises post-COVID from around 800 to around 1,000. The trainee food officer is due to qualify later this year. In addition, a food officer is also due to go on extended leave in June restricting the in-house options to meet targets in 2025/26 as the Council is unlikely to recruit to the temporary post based on previous recruitment.
- 2.6 The new Environmental Health and Community Safety Manager has been asked to carry out a review of resources within the team and a further report will be sent to Cabinet later in the year to ensure the team has sufficient resources to meet FSA targets.

3. The Proposal

- 3.1 In order to meet the target in the most cost-effective manner, it is proposed to use specialist food inspections contractors.
- 3.2 Contractors carry out food inspection for fixed prices, the price dependent on the risk rating, but only carry out the inspections. They do not upload the inspections onto management software, they do not send letters and they do not do follow up inspections or enforce, if that is what the inspection identifies. Therefore, the contractors will be required to complete their inspections with a bias towards completion of the majority by the end of the calendar year, to allow completion by the end of the financial year. It is anticipated the contractor will use two or more food officers. In addition, a part time 3 day per week administration assistant will also be required.

- 3.3 Indicative figures have been obtained from Opus, and these have been used in this report, but if approved, officers will look at other options such as competitive tender to maximise cost effectiveness.
- 3.4 Table 1 shows the current number of inspections required for 2025/26 and the proposed numbers of inspection by in-house officers and external contractors. Table 2 shows the predicted cost for the additional resource for 2025/26.
- 3.5 In determining which inspections the contractors should carry out officers are of the view that Council officers should inspect the highest risk and in order to understand the area, all new business should be inspected by Council officers. Contractors will be required to inspect Cs, Ds and Es.

Table 1. Programmed inspections 2025/26

Category	Number	Officer 1	Officer 2	Officer 3 (leave from June)	Contractors
A	1	1	0	0	0
B	6	3	3	0	0
C	92	31	31	0	73
D	223	0	0	8	268
E	19	0	0	0	70
New registration high risk	108	161	123	44	0
New registration medium risk	36				
New registration low risk	48				

Table 2 Contractor cost for inspections 2025/26*

Category	Number	Cost per inspection	Total (£)
C	73	69.11	5,050
D	268	69.11	18,520
E	70	59.11	4,140
Total			27,710
0.6 fte admin person through Opus grade C			15,850
Total			43,560
10% contingency			4360
Total			47,920

*Figures based on estimates from Opus and consistent with figures from previous use of food consultants.

- 3.6 While the team have a number of key performance indicators, key statistics, and other measures to monitor their performance, this will also need to be reviewed. Performance management will be required to ensure the targets are met. The Environmental Health and Community Safety Manager will obtain monthly updates from the food officers and consultants, and will report progress to the Chief Officer Regulation and Safety and the Communities, Homes, Regulation and Safety Portfolio holder.

4. Service Development

- 4.1 Appointment of EHCS Manager and Service Review – The EHCS Manager has been appointed to lead a service wide review with a focus on aligning capacity with statutory and strategic responsibilities. This will be completed by Q3 25/26.
- 4.2 During 24/25 and prior to the submission of the FSA action plan, higher risk establishments were prioritised for inspection with the highest rated premises (category A) being completed already and category B to be finished by end of 24/25. The recovery aspect of the plan predominantly focuses on lower risk or newly registered food businesses. Category A and B will include premises with vulnerable customers (e.g. care homes, nurseries) and/or premises with higher risk activities (e.g. handling of raw and ready to eat products)
- 4.3 The FSA action plan details the number of each risk category of inspection that is outstanding, alongside the programmed inspections for the 25/26 financial year and the predicted new businesses opening within the year. It also details the months within which they will be inspected, by which officer resource. This details the recovery of the outstanding inspections alongside the completion of the 25/26 inspection programme.
- 4.4 Review of Management Information System Provision and Utilisation – A review is underway into the current management information system to assess both its capability and the way it is used across the service. This work is focussed on improving efficiency through better utilisation, identifying workarounds where system limitations exist and supporting case management and performance monitoring functions more effectively.
- 4.5 Performance and Progress Monitoring – Enhanced performance monitoring processes have been introduced to provide earlier visibility of delivery risks. Team leaders are now reviewing progress against operational targets on a weekly basis, with a view to moving to monthly reporting once performance stabilises. This replaces a previously quarterly model, which did not provide sufficient oversight to intervene early or reallocate resources in a timely way.

5. Conclusion

- 5.1 Officers have been working towards compliance with the FSA guidance following COVID-19 along with other councils.

- 5.2 While officers have worked to meet this, and in some years supported through the use of contractors from budget savings, recent issues have resulted in a significant shortfall, which the FSA expect to be completed within 12 months.
- 5.3 Contractors have a proven record within the council of meeting targets at predicted cost.
- 5.4 A 1-year project using contractors will allow the Council to become compliant with its statutory obligations, and a review will identify how to comply in future years. This might include use of contractors to free food staff who are also required to carry out other environmental health work.

Name of Meeting: Cabinet

Date of Meeting: 8 April 2025

Subject Matter: Additional resource for food inspections

Originating Department: Regulation and Safety

DO ANY BACKGROUND PAPERS APPLY ☐ YES ☐ NO

LIST OF BACKGROUND PAPERS

Doc No	Title of Document and Hyperlink
1	Food law code of practice (England)
2	Food Law Practice Guidance (England)
3	Food Standards Agency correspondence

The background papers relating to reports on planning applications and which are open to public inspection under Section 100D of the Local Government Act 1972, consist of the planning applications, referred to in the reports, and all written responses to consultations made by the Local Planning Authority, in connection with those applications.

☐ Exempt information is contained in the following documents:

Doc No	Relevant Paragraph of Schedule 12A

Action Plan for Rugby Borough Council

Date: 17/02/2025

Actions must be specific, measurable and time bound.

What - issue to be addressed	How - Planned action to secure improvement	By whom (name)	By when (date)	completed
Insufficient number of qualified competent staff to deliver intervention programme in accordance with FLCoP when considered alongside other workload.	<ol style="list-style-type: none"> 1. Work with part-qualified officer to complete food competency framework by end of March 2025 and move officer from E rated premises to higher rated in line with competency. 2. Hire in contractors to pick up lower rated premises. 3. Recruit an RSO (regulatory support officer) to carry out nonofficial controls at lower risk businesses and assist with data entry. (May be an Agency member of staff on a part time basis). 4. Submit a business case to increase staff resource within the Environmental Health team. 	<ol style="list-style-type: none"> 1. EH Team Leader 2. EHCS Manager 3. EHCS Manager 4. EHCS Manager 	<ol style="list-style-type: none"> 1. 31/3/25 2. 31/3/25 3. 31/3/25 4. 31/5/25 	
<p>129 unrated businesses to be inspected from 24/25</p> <p>7 additional identified in 25/26</p> <p>New registrations during 25/26 will continue to come through.</p>	<ol style="list-style-type: none"> 1. Prioritise according to risk. 2. Schedule inspections of all high risk in the next 3 months. 3. Schedule inspections of all lower risk in the next 12 months 4. These inspections are to be carried out by existing RBC staff. 5. New inspections have been considered based on previous averages and staff inspection workloads have been adjusted to accommodate this. Where the number of new registrations exceeds the capacity of officers, further agency support will be considered. 	EH Team Leader	28/2/25	
1 A rated premises intervention for 25/26	This inspection is due in August 2025 and has been allocated to an officer to complete as a priority action for that month.	EH Team Leader	31/8/25	
<p>8 B rated premises interventions outstanding.</p> <p>6 B rated businesses identified as due in 25/26</p>	<p>The 8 overdue inspections are due to be completed by the end of March 2025, however we are aware that one is currently closed and may drift into the next financial year.</p> <p>The additional inspections have been scheduled for when they are due in the programme.</p>	EH Team Leader	<p>30/4/25 – outstanding</p> <p>29/2/26 – 25/26 programmed</p>	
<p>119 E rated premises interventions outstanding</p> <p>19 additional E rated premises interventions for 25/26</p>	<ol style="list-style-type: none"> 1. Provide additional admin support to send out AES questionnaires in next 6 months 2. Questionnaires to be assessed by a competent officer and those where risk has changed or concern re compliance scheduled for a physical intervention within next 12 months. 3. Any E rated premises that are outstanding beyond the end of 24/25 and the additional 19 for 25/26 will be picked up by agency inspectors where physical inspections are due. 	<ol style="list-style-type: none"> 1. Part qualified Food Officer 2. EHO 3. EH Team Leader 	Agency inspections completed by 30 th September 2025.	1. Complete

53 D rated interventions 223 additional D rated premises interventions for 25/26	<ol style="list-style-type: none"> 1. Outstanding and upcoming D rated premises to be prioritised on a risk based method with completion of interventions carried out by RBC officers as well as Agency staff over the next 12 months. 2. Consideration of level of intervention taking into account flexibility offered in code of practice. 	RBC EHOs and Agency inspector	Agency inspections completed by 30 th September 2025.	
43 C rated interventions 92 additional C rated interventions for 25/26	<ol style="list-style-type: none"> 1. Outstanding and upcoming C rated premises to be prioritised on a risk based method with completion of interventions carried out by RBC officers as well as Agency staff over the next 12 months 2. Consideration of level of intervention taking into account flexibility offered in code of practice. 	RBC EHOs and Agency inspector	Agency inspections completed by 31 st May 2025.	

Rugby Borough Council

Climate Change and Environmental Impact Assessment

CONTEXT

In 2019 the UK Parliament set a commitment in law to reach net zero carbon emissions by 2050. Achieving this target will require considerable effort with public bodies, private sector organisations, the third sector and individuals working together to take action.

Rugby Borough Council declared a climate emergency in 2019 and the Council's Corporate Strategy (2021-2024) [link](#) sets ambitious outcomes in relation to Climate Change. These ambitions are further defined through the Council's Climate Change Strategy [link](#) and must now be progressed through the decisions which the Council makes.

It is therefore important that Rugby Borough Council gives due regard to climate change when making decisions. In the context of the Council's business, Climate Change includes greenhouse gas emissions, biodiversity, habitat loss and environmental destruction. When putting forward recommendations for decision, officers must assess how these recommendations are likely to influence our climate change commitments by completing the following Climate Change and Environmental Impact Assessment.

To help you complete this assessment, please see the following guidance on SharePoint [here](#).

A copy of this Climate Change and Environmental Impact Assessment, including relevant data and information should be forwarded to your Chief Officer for approval.

If you require help, advice and support to complete the form, please contact your Chief Officer.

SECTION 1: OVERVIEW

Portfolio and Service Area	Communities, Homes, Regulation and Safety. Environmental Health and Community Safety.
Policy/Service/Change being assessed	Food hygiene inspections.
Is this a new or existing Policy/Service/Change?	Existing.
If existing policy/service please state date of last assessment	
Ward Specific Impacts	None. All wards.
Summary of assessment Briefly summarise the policy/service/change and potential impacts	Environmental health and Community Safety have a legal obligation to comply with food hygiene legislation and statutory guidance. Current resources within the team have resulted in inadequate compliance and additional resources are requested.
Completed By	Paul Pritchett, Environmental Health and Community Safety Manager
Authorised By	David Burrows, Chief Officer Regulation and Safety
Date of Assessment	18/03/2025

SECTION 2: GREENHOUSE GAS EMISSIONS

	No Impact	Positive	Negative	Description of impact	Any actions or mitigation to reduce negative impacts	Action owner	Timescales
Scope 1 Emissions Direct emissions from council owned resources, for example through boilers or vehicles.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				
Scope 2 Emissions Indirect emissions occurring at the location energy is produced for council activities. For example, electricity generation for council buildings.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				

SECTION 3: CLIMATE CHANGE STRATEGY

	No Impact	Positive	Negative	Description of impact	Any actions or mitigation to reduce negative impacts	Action owner	Timescales
Workplaces and the Economy	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				
Transport	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				
Natural Environment	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				
Homes and Energy	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				
Waste, Resources and the Circular Economy	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				
Climate and Nature Positive Communities	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				
Adaptation	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				

SECTION 4: REVIEW

Where a negative impact is identified, the proposal and/or implementation can be adapted or changed; meaning there is a need for regular review. This review may also be needed to reflect additional data and evidence for a fuller assessment (proportionate to the decision in question). Please state the agreed review timescale for the identified impacts of the policy implementation or service change.

Review date	18/03/2026
Key points to be considered through review	N/A.
Person responsible for review	Paul Pritchett, Environmental Health and Community Safety Manager
Authorised by	David Burrows, Chief Officer Regulation and Safety

EQUALITY IMPACT ASSESSMENT (EqIA)

Context

1. The Public Sector Equality Duty as set out under section 149 of the Equality Act 2010 requires Rugby Borough Council when making decisions to have due regard to the following:
 - eliminating unlawful discrimination, harassment and victimisation, and other conduct prohibited by the Act,
 - advancing equality of opportunity between people who share a protected characteristic and those who do not,
 - fostering good relations between people who share a protected characteristic and those who do not, including tackling prejudice and promoting understanding.
2. The characteristics protected by the Equality Act are:
 - age
 - disability
 - gender reassignment
 - marriage/civil partnership
 - pregnancy/maternity
 - race
 - religion/belief
 - sex/gender
 - sexual orientation
3. In addition to the above-protected characteristics, you should consider the crosscutting elements of the proposed policy, such as impact on social inequalities and impact on carers who look after older people or people with disabilities as part of this assessment.
4. The Equality Impact Assessment (EqIA) document is a tool that enables RBC to test and analyse the nature and impact of what it is currently doing or is planning to do in the future. It can be used flexibly for reviewing existing arrangements but in particular should enable identification where further consultation, engagement and data is required.
5. The questions will enable you to record your findings.
6. Where the EqIA relates to a continuing project, it must be reviewed and updated at each stage of the decision.
7. Once completed and signed off the EqIA will be published [online](#).
8. An EqIA must accompany all **Key Decisions** and **Cabinet Reports**.
9. For further information, refer to the EqIA guidance for staff.
10. For advice and support, contact:
Rebecca Ewers
Corporate Equality & Diversity Officer
rebecca.ewers@rugby.gov.uk
01788 533509

Equality Impact Assessment

Service Area	
Policy/Service being assessed	
Is this a new or existing policy/service? If existing policy/service please state date of last assessment	
EqlA Review Team – List of members	
Date of this assessment	
Signature of responsible officer (to be signed after the EqlA has been completed)	

A copy of the completed and signed Equality Impact Assessment report, including relevant data and information to be forwarded to the Corporate Equality & Diversity Officer.

Details of Strategy/ Service/ Policy to be analysed

<u>Stage 1 – Policy to be analysed</u>	
(1) Describe the main aims, objectives and purpose of the Strategy/Service/Policy (or decision)?	
(2) How does it fit with Rugby Borough Council's Corporate priorities and your service area priorities?	
(3) What are the expected outcomes you are hoping to achieve?	
(4) Does or will the policy or decision affect: <ul style="list-style-type: none"> • Customers • Employees • Wider community or groups 	
(5) Will the policy or decision involve substantial changes in resources?	
<u>Stage 2 – Evidence about user population and consultation</u>	As a minimum you must consider what is known about the population likely to be affected which will support your understanding of the impact of the policy, e.g. service uptake/usage, customer satisfaction surveys, staffing data, performance data, research information (national, regional and local data sources).

<p>(1) What does the data tell you about the groups this policy or decision impacts?</p> <p>Possible data sources:</p> <ul style="list-style-type: none"> • national statistics/census data • local statistics • evaluations • analysis of complaints • user feedback • outcomes from consultation/community voice • Council published information, service data • District and Ward Profile – Warwickshire Observatory • Office of National Statistics • Fingertips health profiles • Indices of Multiple Deprivation • RBC Annual Workforce Equality Report 	
<p>(2a) Have you consulted or involved those groups that are likely to be affected by the strategy/ service/policy you want to implement?</p> <p>If yes, please state which groups were involved in the consultation and what were their views and how have their views influenced the policy/decision?</p>	

(2b) If you have not consulted or engaged with communities that are likely to be affected by the policy/decision, give details about when you intend to carry out consultation or provide reasons for why you feel this is not necessary.			
<u>Stage 3 – Analysis of impact</u>			
<p>(1) <u>Protected Characteristics</u> From your data and consultations is there any positive, adverse or negative impact identified for any particular group, which could amount to discrimination?</p> <p>If yes, identify the groups and how they are affected.</p>	Protected Characteristic	Nature of Impact Positive, Neutral, Adverse (explain why)	Extent of impact Low, medium, high
	Age		
	Disability		
	Sex		
	Gender reassignment		
	Marriage/civil partnership		
	Pregnancy/maternity		
	Race		
	Religion/belief		
	Sexual Orientation		

<p>(2) <u>Cross cutting themes</u> (a) Are your proposals likely to impact on social inequalities e.g. child poverty, geographically disadvantaged communities? If yes, please explain how?</p>	Description of impact	Nature of impact Positive, Neutral, Adverse (explain why)	Extent of impact Low, medium, high
	Socio-economic e.g.: child poverty, income level, education level, working hours/occupation, family/social support, access to good nutrition		
	Environmental e.g.: housing status, transport links, geography, access to services, air quality, noise pollution		
<p>(3) Using the information gathered in stages 2 and 3, what will the positive impact of the strategy/policy be on equality?</p>			
<p>(4) Are there any obvious barriers to accessing the service? If yes, how can they be overcome?</p>			
<p>(5) What Equality Monitoring Data will be collected to analyse impact? How will the Equality Monitoring Data collected be used?</p> <p>If no Equality Monitoring Data is being collected, why not?</p> <p>For support with this section, please refer to the Equality Monitoring Guidance.</p>			

(6) Complete this section if any adverse impacts were identified in 3.1.

Outline any actions that will be taken to remove or mitigate the adverse impacts identified in 3.1 to ensure that no discrimination is taking place. If removing or mitigating the impact is not possible, you may in certain circumstances, justify the discrimination. If that is the case, please give evidence for why justifying is possible in this case.

Stage 4 – Action Planning, Review and Monitoring

(1) Data analysis
What does feedback from Equality Monitoring Data gathered tell you about impact on groups? Were there any unforeseen impacts (positive or negative)?

The feedback/data should be used to inform your Action Plan in (2)

<p>If No Further Action is required then go to – Review and Monitoring</p> <p>(2) Action Planning – Specify any changes or improvements that can be made to the service or policy to mitigate or eradicate negative or adverse impact on specific groups, including resource implications.</p>	<p>EqlA Action Plan</p> <table border="1"> <thead> <tr> <th data-bbox="860 347 1120 422">Action</th> <th data-bbox="1120 347 1364 422">Lead Officer</th> <th data-bbox="1364 347 1615 422">Date for completion</th> <th data-bbox="1615 347 1865 422">Resource requirements</th> <th data-bbox="1865 347 2112 422">Comments</th> </tr> </thead> <tbody> <tr><td> </td><td> </td><td> </td><td> </td><td> </td></tr> <tr><td> </td><td> </td><td> </td><td> </td><td> </td></tr> <tr><td> </td><td> </td><td> </td><td> </td><td> </td></tr> <tr><td> </td><td> </td><td> </td><td> </td><td> </td></tr> </tbody> </table>					Action	Lead Officer	Date for completion	Resource requirements	Comments																				
Action	Lead Officer	Date for completion	Resource requirements	Comments																										
<p>(3) Review and Monitoring</p> <p>State how and when you will monitor policy and Action Plan. Will you make any changes to the Equality Data that you are collecting or how you are collecting/using the data?</p>																														

Please annotate your policy with the following statement:

‘An Equality Impact Assessment on this policy was undertaken on (date of assessment) and will be reviewed on (insert review date).’