
Report to Clackmannanshire Council

Date of Meeting: 30 November 2023

Subject: HR Policies - Redeployment

Report by: Senior Manager – HR and Workforce Development

1.0 Purpose

- 1.1. This paper seeks approval to amend the Council's Redeployment Procedure.

2.0 Recommendations

It is recommended that Council:

- 2.1. **Notes** that this paper seeks to maintain the clear intent and expectation of redeploying, where possible, all employees in the event that their post has been removed as a result of organisational transformation or change, whilst recognising that, where a reasonable period has lapsed it is in the interest of both parties to conclude employment and provide appropriate compensation to the employee.
- 2.2. **Notes** the proposed change from an indefinite redeployment period to a maximum period of 6 months (paragraph 5.25, **Appendix 2**).
- 2.3. **Notes** the redeployment benchmarking information provided at **Appendix 1**.
- 2.4. **Agrees** the proposed changes to the Redeployment Procedure (**Appendix 2**).

3.0 Considerations

- 3.1. HR and Workforce Development continue, as part of its rolling programme, to review and update the Council's policies and procedures related to HR, H&S, OD and Payroll.
- 3.2. Engagement on the change from indefinite redeployment to a maximum period of 6 months took place with Trade Unions at the Policy Group held on 29 August 2023 followed by further discussions at Tripartite on 13 September 2023.

- 3.3. A further meeting took place between Trade Unions, the Chief Executive and Senior Manager (HR and Workforce Development) on 26 September 2023. At this meeting benchmarking information was shared and further explanation on the Council's proposal was provided.
- 3.4. A further meeting was held on 11 October 2023 between the Senior Manager (HR and Workforce Development) and Trade Unions aimed at strengthening the redeployment procedure in order to maximise the potential for staff to be successfully redeployment. Many of the proposed changes made by union colleagues have been accepted and are reflected in the updated procedure (Appendix 2) presented to Council.
- 3.5. TU colleagues remain firmly opposed to any change to the indefinite redeployment period.
- 3.6. The Council's existing policy position on indefinite redeployment was agreed in March 2017 with further review and agreement of the procedure by Council in 2021.
- 3.7. The current procedure states "*Staff displaced as a result of organisational change will remain on redeployment indefinitely to ensure maximum opportunity to find suitable or reasonable alternative positions.*"
- 3.8. Prior to the agreed amendment in 2017 the Council's redeployment procedure outlined that "*Staff will remain on the Redeployment Register for the duration of their notice period. If a suitable post cannot be found for them during this period then their employment will terminate upon expiry of the notice and their name will be removed from the Redeployment Register*"
- 3.9. The Council currently utilises Voluntary Severance (VS) and Targeted Voluntary Redundancy (TVR) as mechanisms of achieving reductions in staff numbers and achieving associated budget savings. Since 2017/2018 over a 100 staff have left the employment of the Council on a voluntary basis, of which, 53 were through the TVR process.
- 3.10. VS is a process whereby, in exchange for access to their pension or an Enhanced Redundancy payment, staff apply to leave the employment of the Council on a voluntary severance basis.
- 3.11. Targeted Voluntary Redundancy (TVR) is an opportunity for staff identified only in certain roles to take redundancy and is used when the Council actively needs to reduce its staff numbers or no longer requires a particular post as part of organisational transformation/redesign.
- 3.12. The Employment Rights Act 1996 outlines that a redundancy situation arises where a dismissal is wholly or mainly because the Council:

- has ceased, or intends to cease, to carry on a particular function or role of its business for the purposes of which the employee was so employed or;
 - has ceased, or intends to cease, to carry on a particular function or role of its business in the place where the employee was so employed or;
 - requirements for employees to carry out work of a particular kind has ceased or diminished or are expected to cease or diminish or;
 - requirements for the employees to carry out work of a particular kind, in the place where they were so employed, has ceased or diminished or are expected to cease or diminish.
- 3.13. When a suitable alternative post becomes available to a member of staff on redeployment i.e. a post which is similar to the employee's previous post taking into account of their duties and responsibilities, the terms of the job being offered, skills, abilities and circumstances in relation to the job, pay (including benefits), status, hours and location then the member of staff will be matched to this role. It will in practice only be in exceptional circumstances that suitable alternative roles will become available unless, for example, through redesign where posts previously removed from the structure are reintroduced.
- 3.14. In order to maximise opportunities for staff placed on redeployment as a result of TVR, the Council put in place the concept of reasonable alternative employment. A reasonable alternative post is one which could require similar skills, be of a different grade, offer different hours of work or have a different working environment.
- 3.15. To maximise opportunities to be redeployed **all** vacancies are emailed direct, to redeployees in the first instance in order to provide staff the opportunity to apply for any role in advance of wider circulation internally and/or externally. Only in exceptional circumstances would this process not be followed.
- 3.16. A satisfactory outcome is realised where an employee is redeployed to a suitable or reasonable alternative by mutual agreement. In other instances the employee may state a preference to leave the Council, upon which an appropriate settlement is arrived at in line with policy.
- 3.17. The Council recognises that redeployment is unsettling and that it may have been some time since a staff member has completed a job application or attended an interview. As such training and coaching is available to staff to support them in these areas. This is an area which has been strengthened following engagement with union colleagues.
- 3.18. Recruiting managers are required to consider whether providing reasonable training and/or support would allow a redeployee to be successfully moved into a new role.
- 3.19. The Council's redeployment policy has provision for trial periods for redeployees moving to new roles. The standard trial period is normally 4 weeks but can be extended to a maximum of 6 months if service delivery needs allow e.g. working towards completing a qualification.

- 3.20. Staff who are redeployed to a lower graded role are preserved on their existing salary for a period of 12 months.
- 3.21. Benchmarking suggest that the Council's current policy position is not in keeping with other Scottish councils.
- 3.22. The open-ended nature of the current policy position has created a small number of situations, where a suitable alternative cannot be found meaning that the individual staff member remains on redeployment indefinitely. In such circumstances, the Council continues to bear the full costs of the post despite having made the decision to cease or reduce the function.
- 3.23. Currently there are **7 staff** on redeployment as a result of previous/existing redesigns at a total **unbudgeted cost** of £304,951. The longest period to date of indefinite redeployment for one member of staff is more than 5 years.
- 3.24. It is likely that 2 staff will move off redeployment and be matched to roles following a recent service redesign. In addition one further member of staff has recently accepted Targeted Voluntary Redundancy.
- 3.25. The proposed change to a maximum period of 6 months on redeployment brings the Council more in line with other Local Authorities, of the respondents to our benchmarking survey:
- 77% indicated they did not have a formal policy of no compulsory redundancy whilst 22% advised they did;
 - 67% advised their severance policy, like Clackmannanshire Council's, makes reference to being able to use compulsory redundancy as a tool;
 - 72% of respondents advised that Voluntary Severance, Voluntary Redundancy or Compulsory Redundancy are the basis for staff leaving their organisations on the conclusion of redeployment where no alternative post has been found;
 - Periods of redeployment vary between local authorities but the majority of respondents indicated it was time limited.

4.0 Sustainability Implications

- 4.1. There are no direct sustainability implications arising from this report.

5.0 Resource Implications

5.1. Financial Details

- 5.2. The full financial implications of the recommendations are set out in the report. This includes a reference to full life cycle costs where appropriate.

Yes

5.3. Finance has been consulted and have agreed the financial implications as set out in the report. Yes

5.4. *Staffing*

None

6.0 Exempt Reports

6.1. Is this report exempt? Yes (please detail the reasons for exemption below) No

7.0 Declarations

The recommendations contained within this report support or implement our Corporate Priorities and Council Policies.

(1) **Our Priorities** (Please double click on the check box)

Clackmannanshire will be attractive to businesses & people and ensure fair opportunities for all

Our families; children and young people will have the best possible start in life

Women and girls will be confident and aspirational, and achieve their full potential

Our communities will be resilient and empowered so that they can thrive and flourish

(2) **Council Policies** (Please detail)

8.0 Equalities Impact

8.1 Have you undertaken the required equalities impact assessment to ensure that no groups are adversely affected by the recommendations?

Yes No

The redeployment has previously been assessed

9.0 Legality

9.1 It has been confirmed that in adopting the recommendations contained in this report, the Council is acting within its legal powers. Yes

10.0 Appendices

10.1 Please list any appendices attached to this report. If there are no appendices, please state "none".

Appendix 1 - Benchmarking Summary

Appendix 2 – Redeployment Procedure

11.0 Background Papers

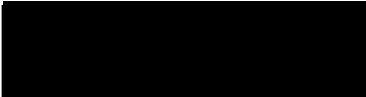
11.1 Have you used other documents to compile your report? (All documents must be kept available by the author for public inspection for four years from the date of meeting at which the report is considered)

Yes (please list the documents below) No

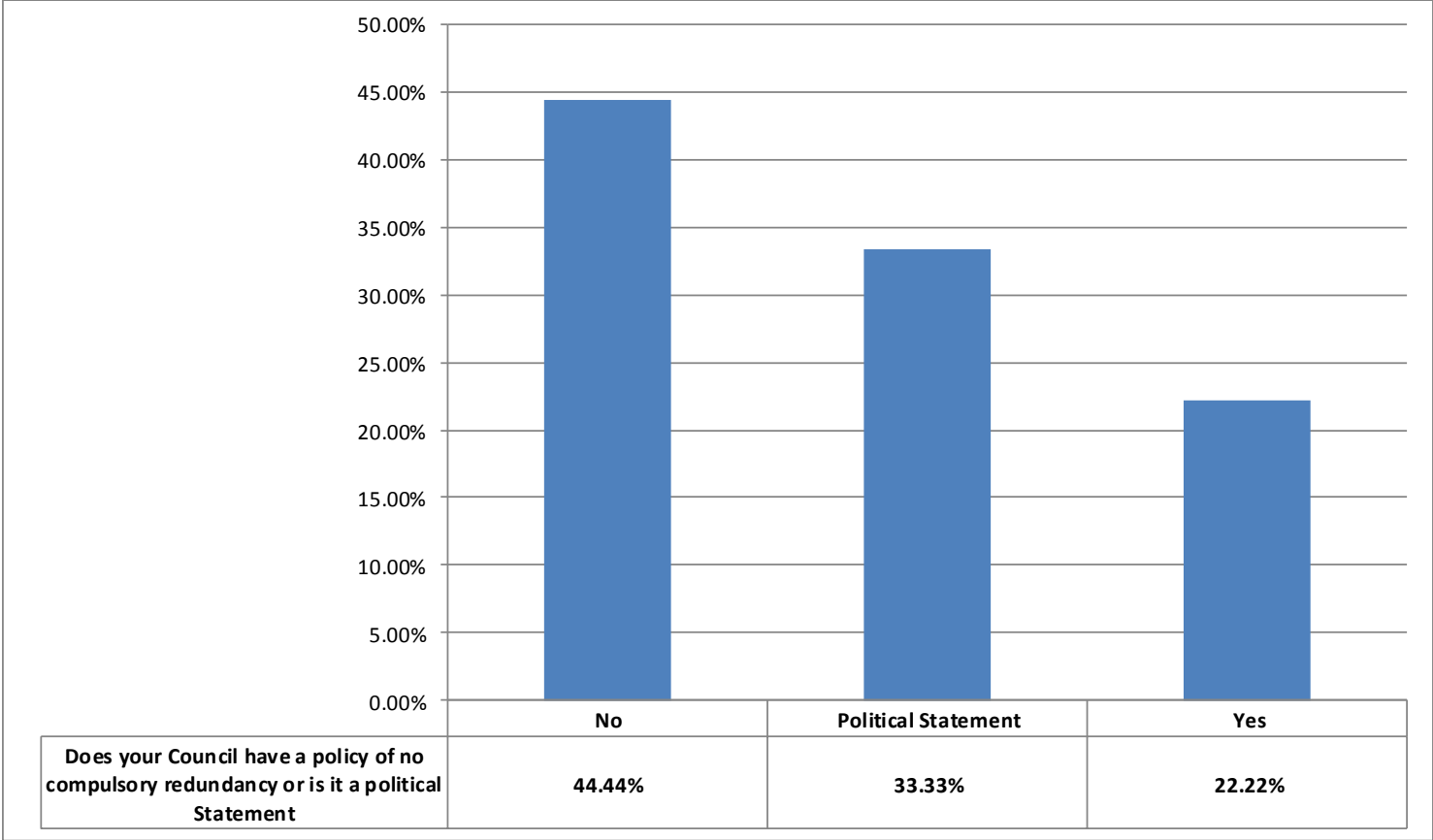
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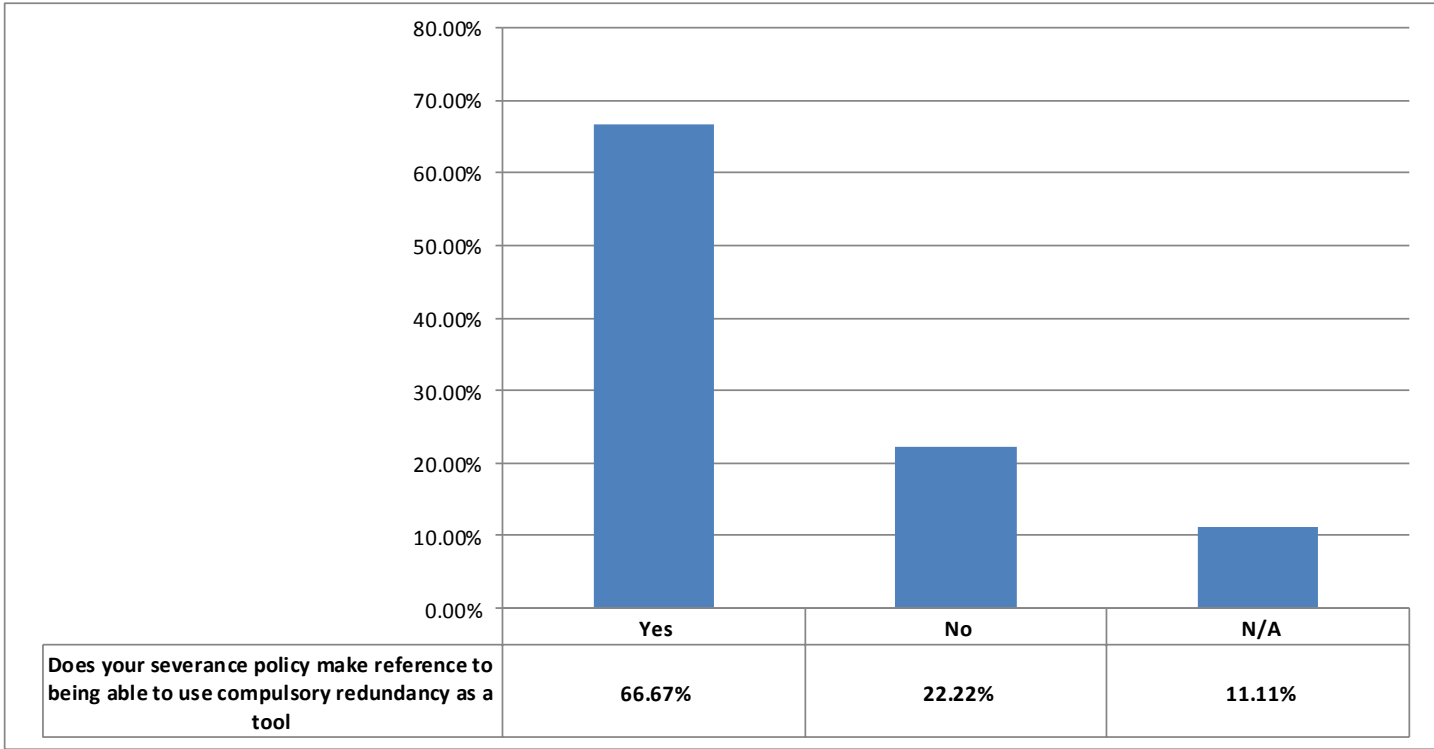
NAME	DESIGNATION	TEL NO / EXTENSION
Chris Alliston	Senior Manager – HR and Workforce Development	2184

Approved by

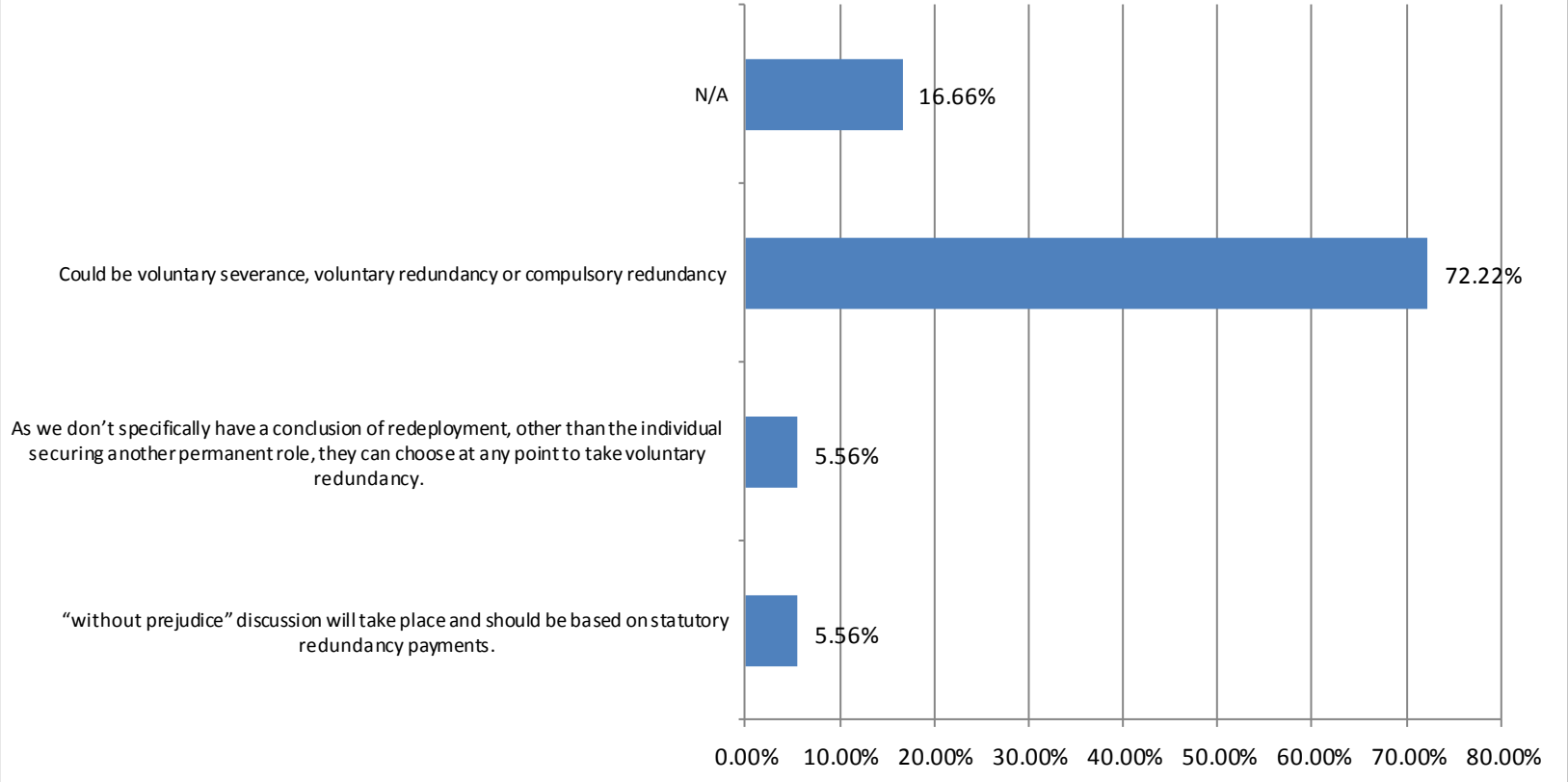
NAME	DESIGNATION	SIGNATURE
Stuart Crickmar	Strategic Director	

APPENIDX 1 – Benchmarking Information – Scottish Councils





What process takes place on conclusion of redeployment i.e. how does the staff member leave the organisation, is it on grounds of redundancy and do they complete a settlement agreement

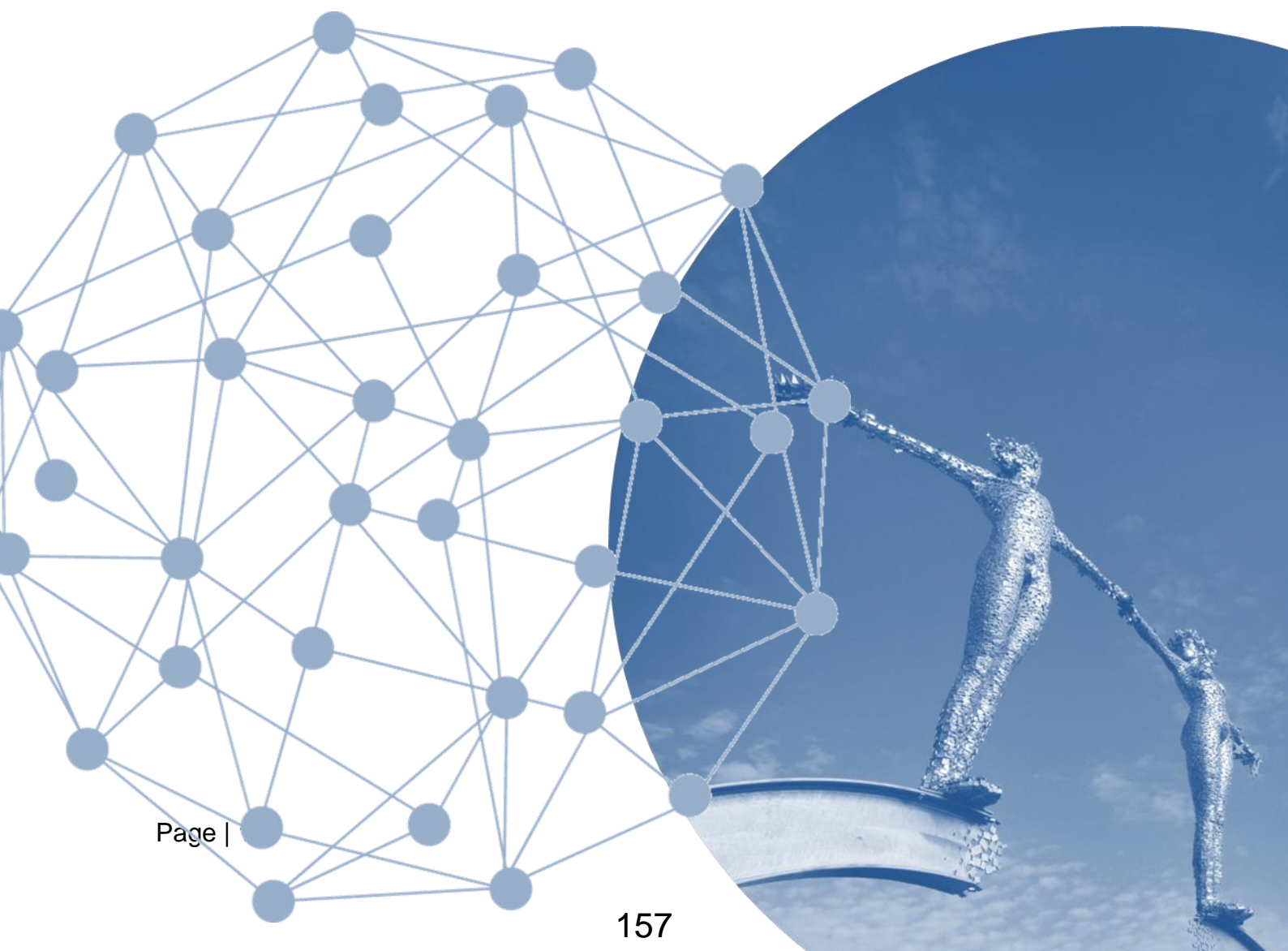


Which Council are you responding from	How long do staff displaced as a result of redesign/redundancy remain on redeployment
1	12 Weeks
2	8 weeks and maximum 3 months
3	Notice
4	N/A
5	We have 3 year cash conservation, when in a redeployment situation, they are immediately cash conserved and during the 3 year period we seek redeployment to a suitable post.
6	12 Weeks
7	there is no time limit but we are currently reviewing our practice around this
8	6 Months
9	Upto 6 Months
10	12 Weeks
11	12 Weeks
12	Until placed
13	Normally 4 weeks, up to a maximum of contractual notice
14	they would go on redeployment before the proposed termination date. This is usually at the start of the formal 30-day consultation period, and would be until the implementation/termination date.
15	The policy says 6 months however in practice indefinitely unless they have refused 2 offers of suitable work.
16	Max 12 Weeks
17	16 Weeks
18	Contractual Notice



Redeployment Procedure

2023



REDEPLOYMENT PROCEDURE

1. Introduction

1.1. This procedure is one of the key tools that supports the Council's strategic workforce plan and should be read in conjunction with it.

1.2. It is recognised that situations may occur where an employee is no longer able to continue in their current role for reasons of restructure, redundancy, capability (ill health or performance).and consequently this procedure should be read (as appropriate) in conjunction with the Council's:

- Severance Policy and Procedure;
- Capability policy & Procedures;
- Maximising Attendance and Employee Wellbeing Policy & Procedures.

1.3. This policy does not apply where the individual would be subject to the TUPE regulations

1.4. Separate mobility and compulsory transfer arrangements apply to teaching staff

2. Representation

2.1. Employees have the right to be accompanied by their trade union representative or work colleague to any meetings convened under the redeployment procedure.

3. Key Principles

3.1. Redeployment into another post will not be automatic, it will only be where the employee meets the minimum/essential requirements for the role, or would with a short period of training, and is then successful following an interview.

3.2. Offers of alternative employment are, at a minimum, subject to a statutory 4 week trial period.

3.3. If an employee is redeployed into a lower graded post their salary will be preserved for a period of 12 months.

3.4. Employees on redeployment will be advised of **all** available jobs (including posts which are currently filled or are being considered for agency/consultancy,) prior to advertisement to the wider Council and/or external market and will be invited to express their interest if they meet the minimum essential requirements.

~~3.4.3.5.~~ They Managers will have ensure regular meeting are held to discuss wellbeing, -upcoming vacancies, potential training opportunities, and suitability for roles. -and discuss their health and wellbeing.

4. Redeployment

Ill Health and Disability

- 4.1. The formal redeployment procedure should only be considered in cases of ill health or disability where there is clear medical guidance from Occupational Health recommending that the employee can no longer carry out the duties of their current post.
- 4.2. The Council will consider redeployment, along with any other reasonable adjustment for any employee with a disability that is covered by the Equality Act 2010, regardless of length of service.
- 4.3. The redeployment procedure will be considered alongside of the Council's Capability procedures.

Risk of Redundancy

- 4.4. This procedure applies where an employee is at risk of redundancy and has a minimum of 12 months -continuous service.

Restructure

- 4.5. This procedure applies where an employee who, in line with rights for unfair dismissal, has a minimum of 12 months continuous service with the Council may no longer have a post or their post is substantially changed, as a result of restructure.

Capability

4.6. This procedure applies where an Employee is consistently falling below the standard required to carry out the duties of their current post, due to lack of ability. In such cases, redeployment procedures will be considered as part of the Council's Capability (performance) procedure.

Individual Circumstances

4.7. This procedure will apply to individual situations where a Senior Manager and employee agree that redeployment could be an appropriate resolution, for example as the outcome of a grievance.

5. Process

5.1. When it is identified that an employee is unable to fulfil the duties of their post because of ill health and all reasonable adjustments have been exhausted, where the employee is at risk of redundancy or where notice of termination is issued to an employee who has a minimum of 2 years service HR will confirm this is the correct process, ensure all appropriate steps have been taken by the line manager and enter the employees details on the Redeployment Register.

Staff displaced due to at risk of redundancy

5.2. Line managers must ~~have held~~ hold a meeting with the staff member, to explain the redeployment process and provide a copy of the Council's agreed procedure.

5.3. This meeting should, where ever/wherever possible be informal, but if the staff member wishes, they can be accompanied by a work colleague or trade union representative. The line manager should discuss:

- The Council's redeployment procedure;
- Qualifications that the staff member has;
- Experience that the staff member has;
- Any specific areas/locations where they employee might consider working;
- What potential roles the staff member may consider;
- What reasonable training/support they might find useful e.g. interview skills, coaching/mentoring.

5.4. /HR Business Partnersfortnight

—During these meetings upcoming vacancies, the matching profile, training opportunities, and health and wellbeing will be discussed.

5.4. †The initial meetings should also include a representatives from Economic Development who will be in attendance with a view of to supporting the employee with finding new employment opportunities either within or potentially outwith Clackmannanshire Council.

5.5. HR will request email contact details from all affected staff ,but for those who do not have a work or personal email then communication will be via post and the line manager.st.

5.6. Staff on the redeployment register will be required to complete a Matching Profile (Appendix 1).

5.7. Line managers/HR Business Partners must meet regularly with employees, and at least once a fortnight, during the redeployment period,

5.8. During these meetings health and wellbeing will be discussed as well as upcoming vacancies, the matching profile and training opportunities might support the staff member.

5.9. Actions from the meeting will be agreed and shared with the employee no later than 2 days after each meeting.

5.10. All employees on the redeployment register will be notified of each vacant post including the profile and specification, as they become available and will be invited to express an interest.

5.11. Vacancies will also be emailed to the employee's line manager.

5.12. Employees under consideration for redeployment are expected to co-operate with the procedure and be actively involved in identifying alternative roles.

5.13. All vacancies, unless in exceptional circumstances, and agreed by ~~HR~~the Senior Manager – HR and Workforce Development, will be issued to staff on the redeployment register in the first instance. Such circumstances may include, for example, where a delay in recruitment may have a financial/legal impact or ~~for example~~ the role is of a specialist nature. Where this has been agreed and wider recruitment is undertaken, any employee applying through redeployment must still be prioritised for interview, provided they meet the essential minimum criteria (or would with a short period of support or training).

~~5.6.~~5.14. A period of short support or training will, normally as a minimum be 4 weeks but may be extended, by mutual agreement, and dependant on the exigencies of the service, to a maximum of 6 months.

~~5.7.~~ The timescale for employees on redeployment to express their interest in a post will be 5 working days from notification .

5.15. Staff on the redeployment register wishing to express an interest for any vacancy should complete a Supporting Statement (Appendix 2).

5.16. If the staff member requires assistance in preparing their supporting statement they can contact their line manager, allocated HRBP or their TU representative.

5.8.5.17. If a suitable/reasonable opportunity arises and the employee is on annual leave the vacancy will not be advertised until discussions have taken place with the employee on their return.

5.9.5.18. Where a post is assessed by HR as being a "suitable alternative post" for a member of staff on the redeployment register, this would then be offered to the employee. The staff member would then be required to demonstrate why they do not feel this is a suitable post otherwise they would be expected to move into the role. A "suitable alternative" would have to be very similar to the current post of the employee in terms of the duties of the job, the day to day activities, knowledge, skills and experience, the status, pay, location, working environment and terms and conditions.

5.10.5.19. A member of staff who fails to express an interest in being considered for a "suitable alternative post" as assessed by HR and who subsequently refuses an offer of a suitable post, whether an interview has taken place or not, may lose their right to payment of their redundancy payment.

5.11.5.20. The relevant recruiting manager will be provided with (1) the Matching Profile and (2) Supporting Statement for each employee who has expressed an interest in being considered for the post being advertised.

~~5.12.5.21.~~ The recruiting manager will be responsible for shortleeting in line with the Councils Recruitment Procedure. (See section 6)

~~5.13.5.22.~~ Staff will have to meet, as a minimum, the essential requirements of the post in full (or would achieve these with a short period of training) and will have to be interviewed for the post.

5.23. There may be some cases where the manager is satisfied that the staff member meets the criteria in the main and would be able to fulfil the requirements of the post with some training. Where a short period of training or working towards a qualification is required, the cost of this will be met from the budget of the Service terminating the Employee's original post.

~~5.14.5.24.~~ If there are no suitable candidates from the redeployment list then the vacancy will be advertised Council wide.

5.25. Staff displaced as a result of organisational change will remain on redeployment ~~indefinitely until such~~ for a maximum period of 6 months.

~~time as they find a new post or in the case of service redesign/redundancy take the redundancy payment.~~

~~5.26. to ensure maximum opportunity to find suitable or reasonable alternative positions~~Every 6~~After 4 months a formal review meeting will take place with the , employee, Line Manager and an HR Business Partner. The employee will have the right to be accompanied by a Trade Union representative or Work Colleague at the review meeting.~~

5.27. The purpose of this meeting is to ensure the process has been complied with, review how the process has gone, what training opportunities and potential posts have been considered/rejected and what further supports could be considered can be done to improve the likelihood of gaining a new post in the period remaining on redeployment. Staff will advised they have a right to bring their TU rep to these discussions. Where no opportunities have been identified or the staff member has not expressed an interest in any position the reasons for this should be explored.

5.28. Where a member of staff undertakes a temporary, fixed term or seconded role, on conclusion they will return to redeployment for the balance of time that was remaining prior to commencing the role. During the period of temporary engagement the staff member will continue to receive vacancy alerts.

~~During these review meetings opportunities presented to the employee should be discussed. Where no opportunities have been identified the reasons for this should be investigated with a focus on why this has occurred and how this could be improved going forwards.~~

5.15. Where there are reasonable opportunities highlighted and these are not being considered by the employee then the employer may take to the decision that the redeployment process has come to it's end. Reasonable opportunities will be those on the same grade (or above) with the same terms and conditions.

Fixed Term/Temporary Posts

5.29. For temporary and fixed term workers (who have over 2 but less than 4 years service), these staff will remain on the Redeployment Register for the duration of their notice period. If a suitable post cannot be found for them during this period then their employment will terminate upon expiry of the notice and their name will be removed from the Redeployment Register.

Ill health

5.16-5.30. Staff on redeployment who are unable to fulfil the duties of their post because of ill health and all reasonable adjustments have been exhausted will be managed in line with the Council's Capability Procedures but the same processes for consideration for posts will apply as outlined above.

6. Assessment of the Employees Suitability for the Vacancy

6.1. The recruiting manager should assess suitability by comparing the employee's Matching Profile and Supporting Statement against the essential requirements in the person specification.

6.2. If the employee clearly fails to meet the essential requirements in the person specification (and could not meet these with a short period of training) and the recruiting manager therefore does not wish to interview, the manager should feedback the reasons to Human Resources. The employee should be offered feedback by the recruiting manager. The HR Business Partner should discuss this with the employee to ensure that all points of view are considered.

6.3. If the employee meets the essential criteria and the decision is to interview, the recruiting manager should arrange the interview and this should must include Human Resources

6.4. The recruiting manager and the appropriate HR representative, should interview and make their decision by assessing the candidates against the person specification for basic suitability, not excellence.

6.5. It is not acceptable to reject an employee on the basis that recruiting through the external market may result in securing a better candidate.

6.6. If the employee is appointed to the post, the appropriate forms must be completed and -should be passed to Human Resources, together with the interview assessment form and supporting statement.

6.7. Where the decision is not to appoint the candidate, the recruiting manager should ensure all relevant forms are -returned to Human Resources.

6.8. The employee must be advised of the decision by the recruiting manager and offered feedback.

6.9. Where Human Resources wishes to challenge the recruiting Manager's view with regard to the potential suitability of an employee from the redeployment register they should:

- approach the Manager to fully discuss the situation;
- escalate to the Senior Manager for the area where necessary;
- refer to a Strategic Director for a final decision.

7. Coaching and Training

7.1. The Council recognises that redeployment is potentially an unsettling process for any employee. It may have been quite some time since the employee has had to complete a job application or attend an interview. Interview techniques training is available for all employees and this should be both promoted and encouraged for affected employees.

~~7.2. Reasonable training should be made available to redeployee's to allow their development of new skills, providing them with further employment opportunities to apply for new posts across all council services in the future.~~

~~7.3. Any reasonable costs will be funded by the service from which the employee has been displaced.~~

~~7.3. Consideration should be given to training which may help an employee to find a position out with Clackmannanshire Council as this will help to resolve the situation and achieve the aims of redesign.~~

7.4. When assessing the employee's potential for a post, recruiting Managers should always consider whether providing reasonable additional training or support would allow redeployment to take place.

7.5. "Reasonable" will usually mean training & support which would allow the employee to carry out the duties and responsibilities of the new role to a basic standard within a trial period normally 4 weeks or to a maximum of 6 months if service delivery needs would allow (for example working towards completing a qualification). It may be the case that the employee cannot continue in the role if conditions such as achieving a specific qualification or registration cannot be achieved in the timescales agreed at recruitment stage.

~~—Any associated costs should be met by the transferring service.~~

~~7.6. Staff on redeployment should be able to access suitable and reasonable training resources and this will be funded from the Councils Corporate training budget.~~

8. Trial periods

8.1. In appropriate circumstances, for example where redeployment will be to a different kind of work, a trial period may be agreed.

8.2. A trial period allows both the recruiting manager and the employee to decide if the new role is suitable.

8.3. The salary -costs during the trial period will continue to be met by the transferring service. Where the trial is to a higher grade the difference will be met by the service area in which the trail is being undertaken

~~8.2.~~8.4. Trial periods will last for 4 weeks and should only be for a longer period if there is a clear justification for this. Similarly, any extension must be for a valid reason which the employee is clear about.

~~8.3.~~8.5. The recruiting Manager should be clear about what they are assessing during the trial period and let the employee know.

~~8.4.~~8.6. The recruiting Manager should meet with the employee regularly during the trial period to provide feedback and support.

8.7. At the end of the trial period the recruiting manager should conduct a formal review meeting with the employee and the Service HR Business Partner to confirm the outcome of the trial

~~8.5.~~8.8. If the trial period has been successful from both the perspective of the recruiting Manager and the employee, the appointment should be confirmed.

~~8.6.~~8.9. If the trial period has been unsuccessful the employee reverts back to their original service and remains on the redeployment register for the balance of the redeployment period which is left.

~~8.7.~~8.10. If the recruiting Manager confirms that the trial has been successful but the employee does not and declines the post, the Council may consider that the employee has refused a suitable post. In these circumstances the employee must be informed of the consequences of declining the post.

~~8.8.~~8.11. The employee will remain on the redeployment register throughout the trial period and should be advised of any other suitable opportunities which arise.

9. Refusing a Suitable Post

9.1. Employees who are prepared to be flexible in the redeployment opportunities are more likely to be successful in securing an alternative post. It is however up to the employee to decide if they will accept the alternative post. In some situations they will wish to consider how any changes will impact on their personal and domestic circumstances.

9.2. Where an employee decides to reject the offer of a post which the Council considers to be suitable, they may lose entitlement to any potential redundancy payment .

9.3. The employee is required to outline fully in writing their reasons for refusing to accept a post that is considered as being a suitable alternative, so that the Council can consider its position with regard to redundancy.

9.4. The decision to withhold redundancy payments will be taken by the Strategic Director (P and P). The employee will be notified of the outcome in writing and they may submit an appeal to a member of the Councils Senior Leadership Group.

10. Monitoring and Review

10.1. Both HR and Trade Union Representatives shall monitor the effectiveness of this policy on an ongoing basis. Changes may result from employee, management and union feedback and/or from changes in employment legislation. Revisions and updates will be implemented by the Council following consultation with the recognised trade unions

Clackmannanshire Council
Redeployment Procedure

Policy Name	Redeployment Procedure
Department	HR
Policy Lead	HR
Equality Impact Assessment	
Stage 1 EQIA completed	Yes
Stage 2 EQIA completed	Yes
* In no please provide rationale	
Date Approved	

