

Consultation Document

Use of Seat Belts by Child Passengers aged 3-13 years on Buses and Coaches

(final phase of DIRECTIVE 2003/20/EC)



USE OF SEAT BELTS BY CHILD PASSENGERS AGED 3-13 YEARS ON BUSES AND COACHES (final phase of DIRECTIVE 2003/20/EC)

Background

EU Directive 2003/20/EC requires Member States to extend compulsory seat belt wearing laws to include the use of child restraints in cars and goods vehicles. It also requires that seat belts, where fitted, must be worn by all passengers aged three and over in buses and coaches.

The Directive has largely been implemented in Northern Ireland. All passengers aged 14 and over are required to wear a seat belt where one is available. The Directive has also been fully implemented in relation to:

- Child restraints (Child Car Seats) in cars and goods vehicles;
- All passengers in 'minibuses' with the driver of a minibus being responsible for ensuring that child passengers up to age 14 use the safety systems provided; and
- Bus and coach passengers, with all bus and coach passengers aged 14 and over required to wear a seat belt (where one is fitted and subject to exemptions).

The Directive has not yet been implemented in relation to children between the ages of 3 and 13 travelling in buses and coaches. It has proved difficult to establish a way of ensuring, as far as possible, that such young passengers wear their seat belts. In particular, there are practical concerns about the extent to which responsibility can be placed on an accompanying adult, a driver or a bus or coach operator.

This consultation paper contains policy proposals designed to address this problem. We wish to ensure that Northern Ireland is fully compliant with the requirements of the Directive. More importantly, we want to improve travel safety for younger bus and coach passengers.

Progress to Date

In September 2007 the Department for Transport (DfT) consulted on how to extend the law on the use of seat belts on buses to younger passengers. DfT sought views on the practicalities of enforcing the requirement in the range of circumstances in which children travel on buses. The consultation was carried out on a UK-wide basis, but under arrangements that enabled separation of the views expressed in Northern Ireland from the overall analysis.

Concerns expressed at the time by stakeholders in Northern Ireland included issues such as who would be responsible for ensuring that children in this age group wear their seat belts, what sanctions there would be should a child fail to comply and who would enforce those sanctions.

A follow up consultation with the Confederation of Passenger Transport (CPT) issued from DfT in 2012. This consultation helped progress the development of A Code of Practice for Bus Operators. The Code detailed 'Reasonable Steps' Operators should take to ensure the safety of all passengers including children aged between 3 and 13 years.

DOE has prepared a corresponding draft Code to reflect processes, procedures and structures in Northern Ireland. That draft Code of Practice forms part of this consultation exercise and is included as an Annex to this document.

Key Challenges

In order to prepare legislation, it is first necessary to identify the person who bears liability for any offence that is created. Current UK law stipulates that criminal liability for the offence of failure to wear a seat belt falls on the individual passenger or driver, unless they are under 14 years of age. In this case, a car driver, for example, commits an offence by driving whilst a child is not wearing a seat belt.

However, a particular problem arises in identifying who should bear such responsibility for children travelling unaccompanied on buses or coaches. It would not be reasonable to make the driver personally responsible for ensuring that such children wear a seat belt at all times. Indeed, such a

requirement might inadvertently lead to driver distraction, potentially creating a greater road safety risk.

Proposed Approach

As part of the pre-consultation phase, the Department met with various interested statutory stakeholders to develop what we believe is a workable policy proposal that will achieve full transposition of the Directive and ultimately reduce passenger casualties. Officials have also engaged with colleagues in DfT.

The Department has identified the following approach:

Group 1 - Children (3-13 years) travelling alone

We propose to extend the Operators' current duty relating to passengers in rear seats in buses/coaches as reflected in the Road Traffic (Northern Ireland) Order 1995, to require the Operator of a bus/coach with fitted seat belts to take '<u>reasonable steps'</u> to ensure that unaccompanied children aged 3-13 years wear their seat belts while the bus/coach is in motion.

A bus/coach is defined as a motor vehicle which is constructed or adapted for the carriage of passengers, has more than eight seats in addition to the driver's seat, has four or more wheels, has a maximum design speed exceeding 25 kilometres per hours, and has a maximum laden weight exceeding 3.5 tonnes.

There is an exemption for vehicles with seat belts being used to provide a local bus service on 'restricted' roads (effectively 30mph roads only), or vehicles designed to carry standing passengers and in which standing passengers are specifically allowed.

Failure to comply with this requirement will be an offence by the Operator acting on behalf of its drivers.

It is important to note that where an Operator takes 'reasonable steps' but ultimately fails to ensure that the child wears a seat belt, no offence will have been committed.

Where the Department believes that an Operator has failed or is failing to take 'reasonable steps', it may impose on that Operator a requirement to do so. Before imposing such a requirement, the Department must first give the Operator notice of its intention. The Operator will then have a period of 28 days to decide whether to comply, appeal to the Department against the requirement – or to take no further action.

If the Department ultimately decides to impose the requirement, failure to comply will attract a financial penalty up to the equivalent of level 2 on the standard scale, or a fixed penalty. A similar approach is proposed for Great Britain.

To assist Operators determine what is deemed 'reasonable' we have developed a draft Code of Practice about seat belt wearing in coaches and buses (including for Operators transporting accompanied children) (Annex A).

Question 1: Do you agree with the proposal to require Operators to take reasonable steps to ensure that children aged 3 to 13 travelling without an adult wear their seat belts? (If appropriate please provide details of any issues with which you disagree)

Question 2: If you do not agree, do you have any alternative proposals?

Question 3: Do you have any comments on the draft Operator Code of Practice?

Group 2 - Child/Children (3-13 years) travelling with an 'accompanying adult'

Where an adult is accompanying a child or a group of children on a bus fitted with seat belts, the adult will be required to take 'reasonable steps' to ensure that the child/children wear their seat belts while the bus is in motion.

This will apply both in circumstances where an adult is accompanying one or more children, and where an adult is accompanying a group of children on an outing.

Again, a bus is defined as a motor vehicle which is constructed or adapted for the carriage of passengers, has more than eight seats in addition to the driver's seat, has four or more wheels, has a maximum design speed exceeding 25 kilometres per hours, and has a maximum laden weight exceeding 3.5 tonnes.

There is an exemption for vehicles with seat belts being used to provide a local bus service on 'restricted' roads (effectively 30mph roads only), or vehicles designed to carry standing passengers and in which standing passengers are specifically allowed.

An 'accompanying adult' should be at least 18 years of age.

Failure to take 'reasonable steps' will be an offence.

The new offence will be punishable by a financial penalty up to the equivalent of level 1 on the standard scale, or a fixed penalty. The responsibility for enforcing this penalty will lie with the PSNI. A similar approach is proposed for Great Britain.

In order to assist accompanying adults determine what is deemed 'reasonable' in these circumstances we have developed a draft Code of Practice about seat belt wearing in coaches and buses (Annex B).

Question 4: Do you agree with the proposal to require any adult accompanying a group of children aged 3-13 years, to take all reasonable steps to ensure that the children wear their seat belts? (If appropriate, please provide details of any issues with which you disagree).

Question 5: If you do not agree, do you have any alternative proposals?

Question 6: Do you have any comments on the draft Code of Practice for accompanying adults?

Responding to the Consultation

We want to ensure that you have the opportunity to comment as easily as possible on the way forward with this specific policy.

For your convenience we have developed a Word version of a Response Form which is available for you to download (Annex C) and return electronically to the e-mail addresses detailed below.

We would also be happy to meet with groups or individuals to discuss the issues detailed in the consultation document if this would be helpful.

Responses should be received no later than Friday 5 February 2016 and can be sent in any of the following ways:

Write to:

E-mail:

Maura Magee
Road User Behaviours Policy & Legislation Branch
Road Safety & Vehicle Regulation Division
Department of the Environment
Clarence Court
10-18 Adelaide Street
TOWN PARKS
Belfast
BT2 8GB
Or

maura.magee@doeni.gov.uk

If you would like a hard copy of the document, please contact us at the addresses provided above or by telephone on 028 9054 1141 or 028 9054 0988.

A copy of the Response Form will be enclosed with all hard copies of the document and we would be happy to provide additional copies of the document or Response Forms on request.

If the papers are not in a format that suits your needs, we can arrange for them to be provided in a suitable format.

When responding, please indicate whether you are responding on behalf of an organisation. Please make it clear who the organisation represents and, where applicable, how the views of members were assembled.

If you have any questions on this document, attached papers or any aspect of this consultation, or if you wish to request a meeting, please contact either Pauline Moore on 028 9054 1141 or Maura Magee on 028 9054 0988.

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Operator Code of Practice Seat Belt Wearing in Buses and Coaches

Seat Belt Law - Buses and Coaches

Passengers aged 14 or over are responsible for wearing a seat belt

Passengers aged 14 or over on buses and coaches commit an offence if they do not wear a seat belt when seated where one is fitted (with some limited exceptions detailed below). The offence is punishable by a fixed penalty notice or a significant court-imposed fine (level 2 on the standard scale).

<u>Children</u>

Seat belts need to be worn by both adults and children.

Drivers of minibuses, like drivers of cars, are responsible for ensuring children under the age of 14 years use the appropriate restraint. If not they are liable for prosecution.

The police enforce seat belt wearing laws for all occupants of vehicles. Passengers over 14 years are liable for not wearing seat belts in minibuses, but drivers face action over unsecured passengers, aged 3 to 13 years.

For buses and coaches, adults accompanying children will be liable for prosecution if they do not take reasonable steps to ensure children under the age of 14 years use seat belts where they are provided. Where there are no accompanying adults, drivers are required to take reasonable steps. Accompanying adults and (in their absence) Operators are liable to financial penalties if reasonable steps are not taken.

If you are an adult accompanying a child/children of 3-13 years, you have the prime responsibility for ensuring they wear a seat belt or child restraint, where they are fitted. This is the case whether you are accompanying, for example, one child or twenty.

Informing Passengers

In addition operators of buses and coaches are required to notify passengers of the need to use seat belts. This can be done by an official announcement, and/or an audio-visual presentation, made when passengers join the bus or within a reasonable time of doing so, or through a sign prominently displayed at each passenger seat equipped with a seat belt.

This Code recommends that coach operators make an announcement or audiovisual presentation when passengers initially join services with one or very few picking up points and do not exclusively rely on signs displayed at seats. The legal minimum is at least one of signing, announcements or presentations.

Not all buses and coaches are fitted with seat belts. In addition there are some exceptions to the legal requirement to notify passengers of the requirement use seat belts when they are fitted. These include:

- when the vehicle is built or adapted to carry standing passengers and the operator permits standing;
- where the vehicle is being used to provide a local service (defined in the Road Traffic (Northern Ireland) Order 1995, but usually a scheduled service available to the general public) which operates wholly within a built-up area (defined as having a speed limit of 30 mph or less). Some local services may be partly outside built-up areas and there is no exemption on these services at any point in their journeys; and
- children aged less than 3 years old, although a child seat must be used if they are travelling in a front seat.

If standing passengers are not allowed and seat belts are fitted, the exceptions to the rule of wearing a seat belt when it is fitted are limited. This Code

recommends even where there are exceptions passengers wear the seat belts provided.

Seat Belt Wearing in Buses and Coaches – for those passengers aged 3–13 years

The primary duty to ensure that bus and coach passengers aged 3 - 13 years wear a belt, (where one is fitted), rests with the adults who are travelling with them.

When there are no accompanying adults present, Operators have a responsibility to take 'reasonable steps' to ensure that seat belts are worn by passengers aged from 3 to 13 years. For those aged below 3 years, there is no requirement for them to be belted (although good practice is to use child restraint systems that work safely with the equipment already fitted on the bus/coach), and for those above 13 years it is the responsibility of the individual passenger.

This document aims to set out some 'best practices' that Operators could implement to be able to demonstrate that they are taking those 'reasonable steps'. It also suggests how operators can work with any accompanying adults present to help them fulfil their duties. This document is not intended to be a prescriptive list; it is possible that other solutions may fulfil the obligation to take 'reasonable steps'.

The 'reasonable steps' that may be taken may vary depending on the type of service that is being operated.

Driver Responsibilities

Action	Reasonable Steps
Notify passengers of need to wear seat belt	 There is a legal obligation to do this under Article 24A of the Road Traffic (NI) Order 1995. It may be done by way of: Official announcement made by the driver, conductor or group leader in relation to any group of persons who are passengers on the vehicle; Audio-visual presentation; or A sign prominently displayed at each passenger seat equipped with a seat belt
	Additional steps could also be taken e.g. driver verbally notifying passengers as they board, or by using a number of the above steps
Check that passengers are seated	Before pulling away drivers should make a visual check to ensure that all passengers appear to be seated. Best practice would be to ensure where possible, that mirrors are so arranged as to enable this check to be carried out, where not all seats are visible directly from the driver's seat. If CCTV is fitted, this may be helpful.
Check for seat belt wearing	For journeys with a single pick up (or low number) the driver should walk down the aisle of the vehicle at least once to check that all the passengers between 3 and 13 are wearing a seat belt.
Procedure for dealing with non-wearing of seat belts	There should be a documented procedure for what a driver should do if it becomes clear that children are not wearing seat belts – for example, by observing standing children in their rear-view mirror. This procedure would include: • Stopping in safe location if the bus is in motion; and • Dealing with non-cooperative children, including making contact with responsible adults; DO NOT • Remove the child from the vehicle for failing to wear a seat belt; or • Intervene physically in any way.
Discussion with Accompanying Adult/Group Leader	In many cases there will be an 'accompanying adult' with groups of children. They have a duty to take reasonable steps to ensure that seat belts are worn. Drivers can help then to carry out this function, for example, by checking from time to time in mirrors and on CCTV. The 'accompanying adult' should be made aware that they are responsible for ensuring that children in their care wear seat belts. It is good practice for drivers and Group Leaders to have a discussion and agree who will do what.
Driver Training	Drivers involved in the practical application of the reasonable steps should be trained on how to do this.
Company Policy	Company policy documents should detail the 'Reasonable Steps' that should be taken – including particular responsibilities that drivers have. There should be a link to disciplinary procedures within the company where procedures are not followed. The requirement to wear a seat belt should also be included in the company's 'Conditions of Carriage'

Company – Additional Steps

Type of Service	Additional Steps
Home to School Transport	Ask the school or college to inform their pupils of the requirement to wear a seat belt.
	Ask the school or college to provide a named contact who can be notified about persistent offenders
	Report persistent offenders to the school or college
	With the agreement of the school or college, withdraw transport for persistent offenders for a short period of time eg a week.
Long distance bus/coach services, excursions or tours where: (1) unaccompanied (3-13 yr olds) are on board; or	(1) Driver to walk down the aisle of the vehicle, to check at least once during the journey that all passengers are wearing seat belts provided
(2) accompanied (3-13 yr olds) are on board.	(2) Operator to inform designated 'accompanying adult' (where relevant) of the requirement to wear seat belts, and of their responsibilities in this matter.
	Driver and 'accompanying adult' should agree roles and responsibilities before setting off on the journey
Other Services (unless one of the exemptions applies)	Check that passengers are seated before departure.
	Where possible, driver should notify passengers by way of a verbal announcement.
	If vehicle has an on-board visual display unit, a notice should be included in this display.
	Stickers with seat belt symbol, to be placed at each seat where a seat belt is fitted

Company Dos and Don'ts

Do	Don'ts
 Make arrangements with schools and colleges to deal with persistent offenders Inform passengers of the requirement to wear seat belts Ask passengers to wear their seat belt, should they fail to fasten it Walk down the aisle of the vehicle to check that all passengers are wearing seat belts where it is feasible to do so If a child refuses to fasten their seat belt, report the matter to the named school contact or 'accompanying adult' 	 Force a child to wear their seat belt Ask the child to leave the vehicle

Enforcement

DVA will be responsible for much of the enforcement of operators' responsibilities for seat belts. This will be done partly by the checking of an operator's systems (alongside those for vehicle maintenance, punctuality etc). There may also be some intelligence-led vehicle spot checks.

The police also can enforce offences related to seat belt wearing, including in buses and coaches.

Offence

Operators who fail to take reasonable steps to ensure passengers are notified, as set out above, are guilty of an offence. Where the offence is committed by a body corporate with the consent or neglect of an officer of the body corporate, then both are guilty of the offence. Consequential amendments to the Road Traffic Offenders Order make the offence punishable on summary conviction with a maximum fine at level 2 on the standard scale.

Obligations	Who may take action	Possible actions
Operator to take reasonable steps to ensure that seat	DVA – Enforcement Team	Issue Compliance Notice Issue Fixed Penalty
belts are worn		Court Appeal
Driver to ensure, as far as	DVA – Enforcement Team	Follow-up with Operator
possible, that passengers	Police	Follow-up with Operator
are wearing their seat belts	Operator	Disciplinary action could be
Ü		taken against employee
Passengers must fasten seat	Police	Prosecution:
belt		 14 + year olds
		 Accompanying adult
	Operator	Persistent offenders barred
		from travelling on the vehicle
		for a short period of time

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Adult supervising a group of children (Accompanying Adult) Code of Practice Seat Belt Wearing in Buses and Coaches

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Children

Seat belts need to be worn by both adults and children.

Drivers of minibuses, like drivers of cars, are responsible for ensuring children under the age of 14 use the appropriate restraint. If not they are liable for prosecution.

The police enforce seat belt wearing laws for all occupants of vehicles. Passengers over 14 are liable for not wearing seat belts in minibuses, but drivers face action over unsecured passengers, aged 3 to 13 years.

For buses and coaches adults accompanying children will be liable for prosecution if they do not take reasonable steps to ensure children under the age of 14 use seat belts where they are provided. Where there are no accompanying adults, drivers are required to take reasonable steps. Accompanying adults are liable to prosecution if reasonable steps are not taken.

Reasonable Steps for an Accompanying Adult

Discussion with Operator	It is good practice for an 'accompanying adult' and driver to have a discussion and agree who will do what.
	Drivers can help, for example by checking from time to time in mirrors and on CCTV, and supporting the accompanying adult to take all reasonable before and during the 'outing'.
Check for seat belt wearing	The 'accompanying adult' should walk down the aisle of the bus/coach at least once to check that all the passengers between 3 and 13 are wearing a seat belt.
Notify passengers of need to wear a seat belt	The 'accompanying adult' should be aware that they are responsible for ensuring that children in their care wear seat belts.
	It is good practice for the 'accompanying adult' and driver to agree in advance, who will do what.
	The 'accompanying adult' should make an announcement before departure reminding the group of the need to wear seat belts.
Procedure for dealing with non-wearing of seat belts	The organisation represented by the 'accompanying adult' should develop a documented procedure detailing what the 'accompanying adult' should do if it becomes clear that children are not wearing seat belts. This procedure might include: • Asking the driver to stop in safe location; and • Deal with non-cooperative children, including making contact with parent;
	 Remove the child from the vehicle for failing to wear a seat belt; or Intervene physically in any way.

Response Form

Use of Seat Belts by Child Passengers aged 3-13 years on Buses and Coaches
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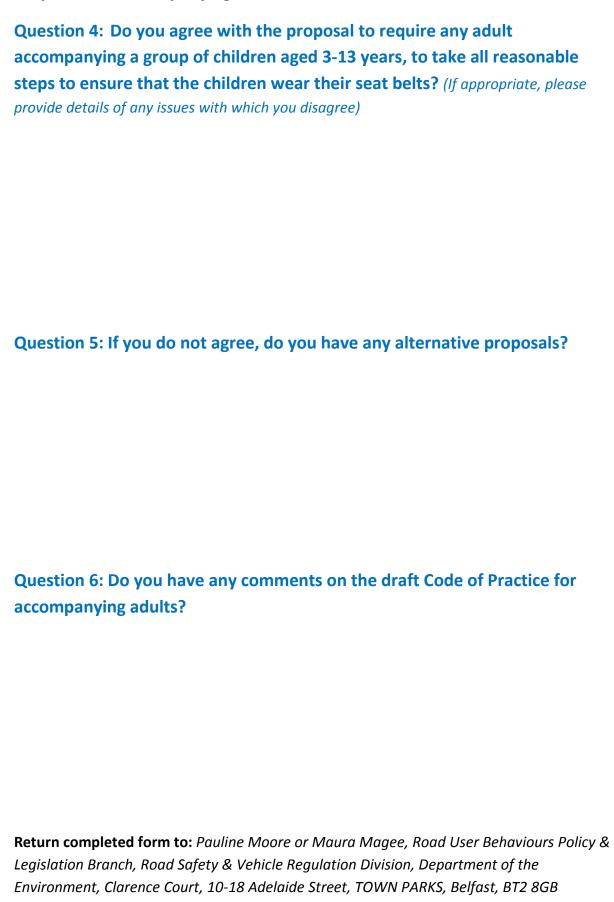
When responding, please indicate whether you are responding on behalf of an organisation.
Please make it clear who the organisation represents, and where applicable, how the views
of members were assembled.

Name	Organisation
If answering on behalf of an orga	nisation how were the views of members
assembled.	

Proposal for Operators	

Question 1: Do you agree with the proposal to require operators to take reasonable steps to ensure that children aged 3 to 13 travelling without an adult wear their seat belts? (If appropriate, please provide details of any issues with which you disagree).
Question 2. If you do not agree, do you have any alternative proposals?
Question 3 Do you have any comments on the draft Code of Practice?

Proposal for 'Accompanying adults'



Annex D

List of Consultees

- 1. Action on Elder Abuse Northern Ireland
- 2. Action on Hearing Loss
- 3. Age NI
- 4. Alliance Party of Northern Ireland
- 5. An Munia Tober
- 6. Autism NI
- 7. Bahai Council for NI
- 8. Barnardos NI
- 9. Belfast Butterfly Club
- 10. Belfast Health Trust
- 11. Belfast Hebrew Congregation
- 12. Belfast Islamic Centre
- 13. Bishop of Down and Connor
- 14. Boys Brigade (NI)
- 15. British Deaf Association (NI)
- 16. Bryson Charitable Group
- 17. Bryson Inter-Cultural
- 18. Bus Forum
- 19. Bus Operators across NI
- 20. Carafriend
- 21. Carers Northern Ireland
- 22. Catholic Boys Brigade

- 23. Children's Law Centre
- 24. Chinese Welfare Association
- 25. Chrysalis Women's Centre
- 26. CO3 Chief Officers 3rd Sector
- 27. Coiste-na n-iarchimi
- 28. Commissioner for Older People
- 29. Committee on the Administration of Justice Ltd
- 30. Communication Access
- 31. Community Development and Health Network (NI)
- 32. Community Places
- 33. Community Relations Council
- 34. Community Transport Association for (NI)
- 35. Consumer Council
- 36. Cruse Bereavement Care (NI)
- 37. Democratic Unionist Party
- 38. Derry Well Woman
- 39. Disability Action
- 40. District Councils
- 41. Down & Connor Youth Commission
- 42. Down's Syndrome Association
- 43. Education Authority Belfast Region
- 44. Education Authority North Eastern Region
- 45. Education Authority Southern Region

- 46. Education Authority Western Region
- 47. Employers for Disability NI
- 48. Equality Coalition c/o CAJ
- 49. Equality Commission for NI
- 50. Falls Community Council
- 51. Falls Women's Centre
- 52. Family Planning Association NI
- 53. Federation of Passenger Transport NI
- 54. Focus: The Identity Trust
- 55. Foyle Women's Information Network
- 56. Freight Transport Association
- 57. Gaelige Athletic Association
- 58. Gingerbread NI
- 59. Girls Brigade(NI)
- 60. Girl Guides Ulster
- 61. Government Departments
- 62. Grand Orange Lodge of Ireland
- 63. Green Party
- 64. Inclusive Mobility & Transport Advisory Committee (IMTAC)
- 65. Indian Community Centre
- 66. Institute of Directors
- 67. Irish Congress Of Trade Unions NI Committee (ICTUNI)
- 68. Irish Football Association
- 69. Law Centre (NI)

- 70. Licensed NI Bus Operators
- 71. Local Government Staff Commission for NI (LGSC)
- 72. Magherafelt Women's Group
- 73. MENCAP
- 74. Methodist Church in Ireland
- 75. MOD Police
- 76. National Autistic Society Northern Ireland
- 77. Northern Health Trust
- 78. National Society for Prevention of Cruelty to Children
- 79. Northern Ireland Commissioner for Children and Young People
- 80. NI Council for Voluntary Action (NICVA)
- 81. Northern Ireland Grammar Schools
- 82. NI Human Rights Commission
- 83. Northern Ireland Independent Schools
- 84. Northern Ireland Primary Schools
- 85. Northern Ireland Rural Development Council
- 86. Northern Ireland Rural Women's Network
- 87. Northern Ireland Secondary Schools
- 88. NI Women's Aid Federation
- 89. NIPSA
- 90. NI Association for Mental Health (Niamh)
- 91. Northern Ireland Association for the Care and Resettlement of Offenders (NIACRO)
- 92. Northern Ireland Council for Ethnic Minorities

93. Parents Education Autism Therapists - PEAT (NI) 94. Parenting NI 95. POBAL 96. Polish Association Northern Ireland 97. Presbyterian Church in Ireland 98. Progressive Unionist Party 99. PSNI 100. Royal National Institute of Blind People (NI) 101. **Rural Community Network** 102. **Rural Support** 103. Save the Children 104. Scouts NI 105. **SDLP** 106. **SENSE NI** 107. Sinn Fein 108. Southern Health Trust 109. South Tyrone Empowerment Programme (STEP) 110. The Cedar Foundation 111. The Guide Dogs for the Blind Association 112. The Rainbow Project 113. The Senior Citizens Consortium Sperrin Lakeland 114. The Trans Forum 115. The Women's Centre

Training for Women Network Ltd 116. 117. Translink 118. **Ulster Unionist Party** 119. ULTACH 120. **UNISON** Northern Ireland 121. **Volunteer Now** 122. Western Health Trust 123. Women's Forum Northern Ireland Women's Resource and Development Agency 124. Women's Support Network 125. 126. Workers Party 127. **Ulster Farmers Union** 128. Youthnet

Statutory/Regulatory Assessments

Under Section 75 of the Northern Ireland Act 1988 the Department is required to have due regard to the need to promote equality of opportunity:

- Between persons of different religious belief, political opinion, racial group, age marital status or sexual orientation;
- Between men and women generally;
- Between persons with a disability and persons without; and
- Between persons with dependants and persons without.

In addition, without prejudice to its obligations above, the Department is also required, in carrying out its functions relating to Northern Ireland, to have regard to the desirability of promoting good relations between persons of different religious beliefs, political opinions or racial group.

We have carried out an equality screening exercise for this proposed policy and found that it does not have significant equality impacts. A full Equality Impact Assessment, therefore, is not required.

A Regulatory Impact Assessment was also completed for this policy.