

TITLE OF REPORT: **Climate Emergency Update, Environmental Policy update and Biodiversity Duty**

REPORT OF: **Anneliese Hutchinson, Interim Strategic Director, Economy, Innovation and Growth**

Purpose of the Report

1. Cabinet is requested to;
 - a. Note the results of the independent environmental Audit
 - b. Note the carbon monitoring report summary
 - c. Note the ongoing activities that are progressing towards our climate and environmental sustainability targets (Appendix 2).
 - d. Note the Council's Biodiversity Duty and agree to a biodiversity report of the Council's activities
 - e. Recommend full Council approve the amended wording to the Council's Environmental Policy (Appendix 3).

Background

2. Following the declaration of a climate emergency in 2019 (Appendix 1), the adoption of the Climate Action Plan for council operations in 2021 and the adoption of the Climate Strategy for Gateshead in 2022 progress is being made to both mitigate the impacts of climate change by reducing emissions and to protect our communities by making them more resilient to the impacts of climate change.

Proposal

3. Environmental Policy

The Environmental policy for the Council was approved in February 2021. Following a review of the policy there is a proposal to make some amendments to better align the policy to the declaration of a climate emergency and the Climate Action plan (2021) and Climate Strategy (2022). The amended wording (set out in Appendix 3) primarily clarifies that the carbon reduction target relates to 'carbon neutrality' not 'net zero' which allows for carbon offsetting and that 'clean' energy refers to 'low-carbon' energy providing clarity to our ambitions.

4. Investors in the Environment Audit

Following the Climate Emergency Declaration made by Full Council on 23 May 2019, Cabinet agreed that officers should commence an environmental audit of the Council's activities. The first audit was carried out in 2020 and the 3rd annual review has been undertaken by consultancy firm Genee which concluded that the Council was still achieving silver level accreditation. The report will be published on the website and on this link <https://www.gateshead.gov.uk/Gateshead-Council-IIE-Accreditation-Report>

5. Carbon Monitoring

To align with best practice and get ready for new legislative requirements, the Council procured 'SmartCarbon' for carbon reporting in 2022. This tool measures both direct and indirect emissions which allows the Council to more effectively meet its commitments to reducing carbon and assess whether interventions are effective in reducing carbon emissions.

Data that is comparable to previous years monitoring demonstrates that the Council is continuing to reduce its carbon emissions, year on year, which has been the case since monitoring began in 2010.

Year	19/20	20/21	21/22	22/23
Carbon Tonnes	22,265	18,137	17,481	15,295

The new monitoring system provided a new baseline, which takes account of more sources of carbon, including indirect sources of emissions.

The main new sources of carbon being monitored are;

- Supply chain emissions (procured good and services)
- Staff commuting
- Working from home (emissions arising from staff during work time)

Year	21/22	22/23
Carbon tonnes	91,667.40	82,063
% change	-	-10.5%

Steps are being taken to make this monitoring more accurate and robust over time, and the Council is working with other local authorities in the North East to establish best practice.

The Carbon report will be published online and can be found here.

<https://www.gateshead.gov.uk/Gateshead-Council-Carbon-Monitoring-Report-2022-23>

6. Progress towards our targets

Appendix 2 provides details of progress over the last year against our targets. Work with schools and tree planting has been of particular note and progressed well. Whole Council employee training on climate change was launched and is providing a foundation of climate knowledge for the whole Council.

7. The Biodiversity Duty: First Consideration

The Council has a statutory duty to conserve and enhance biodiversity (habitats and species) as set by the Environment Act 2021 and the amended Natural Environment and Rural Communities Act 2006 (NERC Act). This is known as 'the biodiversity duty'.

The Department for Environment, Food & Rural Affairs (Defra) has published guidance on purpose and compliance.

The Council, as a local authority, must:

- Consider what it can do to conserve and enhance biodiversity.
- Agree policies and specific objectives based on its consideration.
- Act to deliver its policies and achieve its objectives.
- Report on its biodiversity duty actions. (Defra has guidance on this.)

The Council must, as part of their strategic assessment of their functions, have regard to any relevant Local Nature Recovery Strategies (LNRs), Species Conservation Strategies and Protected Site Strategies (introduced in the Environment Act).

Practical actions to achieve objectives could cover the full range of relevant Council activities such as:

- land under its ownership or management;
- built asset management;
- corporate policies and practices e.g. for water and natural resources, waste, artificial lighting, sustainable procurement;
- community engagement;
- partnership working;
- development plans, planning advice and decisions (LPA activity);
- delivery of Biodiversity Net Gain (BNG) – separately both as LPA and landowner/developer.

Local authorities and local planning authorities must write and publish a biodiversity report. The end date of our first reporting period should be no later than 1 January 2026. After this, the end date of each reporting period must be within 5 years of the end date of the previous reporting period.

It proposed Gateshead commence a Biodiversity Report of the Council's activities using a method that complies with national guidelines to report later in the year.

Recommendations

8. It is recommended that

- (i) Full Council approve the amended wording to the Council's Environmental Policy
- (ii) That work commences to produce the first Biodiversity Report by Winter 2024.

for the following reason(s)

- (i) To progress towards the Council's carbon neutrality commitment
- (ii) To fulfil the Council's biodiversity duty

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APPENDIX 1

Policy Context

1. Gateshead Council declared a Climate Emergency at Council on 23 May 2019 which outlined the following commitments.

Item 1. The declaration of a 'Climate Emergency' that requires urgent action.

Item 2. Make the Council's activities carbon neutral by 2030

Item 3. Achieve 100% clean energy across the Council's full range of functions by 2030

Item 4. Ensure that all strategic decisions, budgets and approaches to decision making are in line with a shift to zero carbon by 2030

Item 5. Support and work with all other relevant agencies towards making the entire area carbon neutral within the same timescale.

Item 6. Ensure that political and chief officers embed this work in all areas and take responsibility for reducing, as rapidly as possible, the carbon emissions resulting from the Council's activities, ensuring that any recommendations are fully costed.

Item 7. Work with, influence and inspire partners across the borough to help deliver this goal through all relevant strategies, plans and shared resources by developing a series of meetings, events and partner workshops

Item 8. Request that the Council and partners take steps to proactively include young people in the process, ensuring that they have a voice in shaping the future.

Item 9. Call on the UK Government to provide the powers, resources and help with funding to make this possible, and ask local MPs to do likewise.

Background

2. The Council declared a climate Emergency in 2019. The Climate Action Plan setting out how the Council will work towards carbon neutrality was published in 2021 and a Council wide Environmental Policy was adopted in 2021. The Climate Strategy for Gateshead was adopted 2022.

Consultation

3. The Leader, Deputy Leader and Portfolio Holders for Environment and Transport were consulted in the preparation of this report.

Alternative Options

4. There are no alternative options.

Implications of Recommended Option

5. Resources:

a) Financial Implications – None

- b) **Human Resources Implications** – None
- c) **Property Implications** - None
- 6. **Risk Management Implication** - None
- 7. **Equality and Diversity Implications** - The actions supports equality and diversity
- 8. **Crime and Disorder Implications** – None
- 9. **Health Implications** - The actions have positive health implications.
- 10. **Climate Emergency and Sustainability Implications** - The actions have strong positive implications for climate and sustainability.
- 11. **Human Rights Implications** - None
- 12. **Ward Implications** - All

Background Information

Environmental Policy

[Appendix 5. Environmental Policy Feb 2021.pdf \(gateshead.gov.uk\)](#)

Gateshead Council Climate Emergency Action Plan

[3336-MC-Climate_emergency_Action_Plan_v22.pdf \(gateshead.gov.uk\)](#)

Climate Strategy

[Climate Change Strategy 2022 - Gateshead Council](#)

Council Budget

[Budget 2024-25 - Gateshead Council](#)

Carbon monitoring

1. On recommendation from the IIE audit, the Council expanded its monitoring of carbon emissions and other greenhouse gases to include scope three emissions in addition to the scope 1 and 2 emissions covered by previous monitoring. The Council had previously monitored only scope 1 and 2 emissions and very limited scope 3, which consist of direct emissions such as energy consumed or business vehicles. Scope 3 emissions are those that are indirect such as procured goods, staff commuting or working at home.
2. From the 2021/22 financial year, this broader monitoring system was implemented, with emissions reported through SmartCarbon. SmartCarbon is an emissions monitoring and reporting tool, and is used by some other local authorities in the North East as well as other public sector organisations, for example Newcastle upon Tyne Hospitals NHS Foundation Trust. The new tool will ensure that the Council is prepared for additional monitoring requirements going forward.
3. A large proportion of the data required for the tool is data that is already collated and monitored by the Energy Team in the Council, however there are additional monitoring indicators.
4. Data that is comparable to previous years monitoring demonstrates that the Council is continuing to reduce its carbon emissions, year on year, which has been the case since monitoring began in 2010.

year	19/20	20/21	21/22	22/23
Carbon Tonnes	22,265	18,137	17,481	15,295

5. The new monitoring system provides a new baseline, which takes account of more sources of Scope 3 carbon such as staff commuting. This new base line from 21/22 was **91,667.40 tonnes**. This is the first year to monitor against the new baseline.

Year	21/22	22/23
Carbon tonnes	91,667.40	82,063
% change from previous year	-	-10.5%

6. This increased monitoring is best practice and allows the Council to more effectively meet its commitments to reducing carbon, although figures will also be reported for scope 1 and 2 as comparison with current and previous years reporting.
7. One of the Council's biggest sources of carbon emissions is through procured goods and services. The Climate team are working with the procurement team to start effectively monitoring these emissions, through the tool, in addition to working with our local supply chain to support them in reducing their carbon footprint.

8. Other new areas of monitoring for SmartCarbon include, staff commuting and working from home emissions. These additional sources of carbon that are being monitored will allow the Council to assess whether interventions are effective in reducing carbon emissions, such as the Council Travel Plan.
9. It should be noted that the report requires the use of assumptions, and these are explained within the report.

Investors in the Environment Audit

10. The Council maintained its Silver accreditation.
11. The report states that 'Gateshead Council continues to demonstrate their organisation's commitment to minimising their environmental impacts and meet their carbon neutral by 2030 targets.

... they are showing leadership in responding to the climate emergency in the region. They've made great strides in their carbon reduction, supported by their use of the SmartCarbon platform, and were awarded Best Carbon Reduction at the 2022 iiE awards as a result.'

12. The recommendations include;

- Review and update the Environmental Policy to ensure it is in line with other policies and targets.
- Recommend closely monitoring the impact that training for staff is having on the understanding of climate change, specifically related to their role and individual impact.
- Produce and implement a waste management plan for the organisations waste, ensuring that waste audits provide data on composition and volumes. The overall aim of this will be to minimise waste, increase recycling and identify awareness raising opportunities.
- Further development of Action Plans to drive improvements across the organisation and engage different departments in achieving improvements.
- Ensure there is a clear feedback process for staff to share ideas and become Green Champions within the organisation.
- Recommend writing and implementing an updated travel plan and strategy as this is key for the reduction of carbon.
- Look to include more scope 3 monitoring including supply chain data.

Progress in the last 12 months towards climate change

13. The Council continues to explore and implement projects that will contribute towards addressing the Climate Emergency while also complementing Thrive objectives. The activities listed below are among those that have been taken forward in recent months across different Council services, with co-benefits for decarbonisation;

Awards

14. The Council won 'Best Carbon reduction' Investors in the Environment Award in 2022.
15. The Council was 'highly commended' for 'leadership in climate change' at the MJ awards in 2023.

Human Resources

16. Climate Emergency and how this is the responsibility of all staff and teams within the Council has been included within the induction pack for new starters at the Council, in addition the A and D procedure now includes a question on how each member of staff is contributing towards combatting climate change. This is being supported by a compulsory e-module on climate change for all staff which commenced in September 2023.

Local Plan

17. The Local Plan review is underway and a consultation took place in 2023/24 on the 'Start of the Conversation: the Gateshead Plan.' Climate change is a key feature throughout the document, but in particular theme 2 'Tackling Climate Change and enhancing the environment' which seeks to 'ensure all new development is carbon neutral (as a minimum) and that our communities and the environment are adaptable and resilient to climate change and flood risks'.

Themes

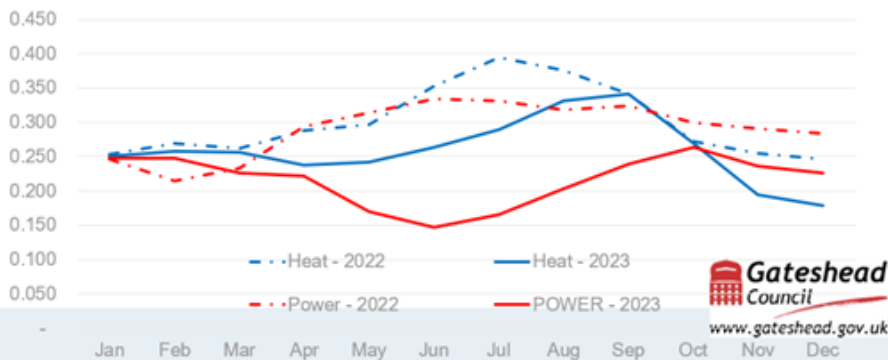
Energy

18. The heat network has recently been connected into the GRP new build site, Freight Village, off St James Rd, which over the next 4 years will see 270 new build homes (mix of private rent, social housing and open market homes) with low cost, low carbon heat. (houses are lifetime homes standard too)
19. On summer days the solar connects into the heat network and gives us a net zero heat network. Below are statistics around use of renewables in the network for 2023.

2023 – reducing network carbon emissions

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug
% renewables - power	4%	9%	17%	31%	46%	50%	42%	42%
% renewables - heat	3%	3%	7%	8%	16%	20%	7%	0%

Monthly carbon factors, 2022 and 2023



20. We also received £280k funding from Innovate UK for the Fast Followers project – Engaging Gateshead with Net Zero, funding an officer for two years to support with overcoming non-technical barriers to net-zero.

Transport

21. Active and sustainable travel helps the climate, health and well-being and focuses on the most cost-effective way of travelling. It is a particularly effective way to make last mile journeys.
22. Transport North East are carrying out a refresh of the Transport Plan for the NE which will be finalised once the new combined authority mayor is in place.
23. In December last year the Joint Transport Committee adopted a regional Zero Emission Strategy which underpins the approach of Gateshead to EV charging. In Gateshead Electric vehicle charging infrastructure funding has been secured through LUF and UKSPF with a further bid for charging infrastructure being developed by Transport North East. This will equip more car parks.
24. The North East Enhanced Partnership (EP) came into effect in April 2023. Under the Partnership, funding is earmarked to Gateshead for public transport corridor improvements which will complement the upgrades to traffic signals which are underway currently funded through the Transforming Cities Fund. These will help journey times and enable public transport priority.
25. The £2 single bus fare has continued following extended support by government. In addition, the EP Partners have introduced new cheaper multi-modal day ticketing

across the region.

26. Officers are working with TNE to develop a programme of schemes to be implemented following the introduction of the combined authority, these will boost sustainable modes of transport.
27. Improvements to pedestrian access in the Quays have been carried out along with an improved pedestrian crossing at the end of the Tyne Bridge. Active travel events in Birtley schools resulted in reductions in home to school car use.
28. There are ongoing transport improvements underway, including the A167 cycle ways, the West Tyneside Cycle route and Metrogreen.
29. In addition, there is Active Travel England funding in Felling to improve cycle and pedestrian routes. Improved pedestrian crossing facilities have been introduced at the southern end of the Tyne Bridge as part of the work in the Quays. Whilst a social prescribing active travel project in East Gateshead is underway. The project is being implemented in conjunction with Edberts House, and Newcastle Gateshead CCG. The East Gateshead active travel schemes are an outcome of the LCWIP development and will complement the social prescribing activities.
30. Development of the Local Cycling and Walking Infrastructure Plan (LCWIP) for the borough is continuing following consultation last year. This identifies priorities for attention and will support the development of funding bid programmes. The development of the LCWIP has been funded through the Capability Fund administered by Active travel England.
31. The Council Travel Plan is being updated and will benefit from a forthcoming staff travel survey. Alongside existing travel plan measures (cycling facilities, business metro passes, discounted public transport fares etc.), engagement events have been held with staff to encourage changes to travel behaviour. This has included working closely across Council services in identifying specific needs raising awareness and holding events for staff to raise the profile of the travel plan offer.
32. The Council is engaging proactively in encouraging business travel plans. The Council Green Steps information for businesses to increase active and sustainable travel is now on the website. Stakeholder engagement has been held with businesses to increase awareness of the Tyne Bridge works and the opportunity to change travel behaviour to help mitigate its impact whilst reducing carbon emissions. Active and sustainable modes of travel are being promoted as alternatives to car travel during the restoration work. There will be engagement with businesses, staff and the travelling public through joint campaign along with Newcastle City Council and contractors Esh.
33. Our work with children in schools includes the introduction of the Be Cool toolkit to help schools encourage active travel. School engagement in travel planning is increasing and two projects in Gateshead were nominated for The Team Modeshift National Sustainable Travel Awards 2023. The Council and Living Streets were nominated in the 'Education Engagement Project of the Year' category for their collaboration on 'Be Cool Birtley', which brought together children from five schools

around to compete in a 'Walk of Fame' to see who could increase the number of people walking, cycling and scooting to school, and encourage more parents to park away from school to 'park and stride'. St Joseph's Catholic Primary School were separately nominated in the 'Best TravelWise Week Campaign - School' category for their efforts during TravelWise Week. We are delivering Bikeability and Child Pedestrian training to schools across Gateshead, with our team providing Child Pedestrian Training in six of the region's authorities.

34. Funding has also been used to investigate approaches for school streets. This sits alongside the UK Shared Prosperity Fund programme to increase active travel measures, facilities and incentives including grants for business, scooter pods for schools and development of mobility hub facilities for car club, EV charging and cycling.

Food

15. In 2023 a Sustainable Food Partnership Coordinator was appointed who will help drive the food related priorities forward for Gateshead, including climate mitigation and adaptation. The North East are also taking part in a pilot 'Good Food Local'. Good Food Local is a project run by Sustain: the alliance for better food and farming, with funding from Impact on Urban Health. Sustain has been working with local authorities in London for over 10 years to track data relating to the availability of healthy and sustainable food and wants to roll the scheme out nationwide, the North East has been chosen as the next region to roll out the scheme.

Economy and consumption

16. The Business Energy Savings Team (BEST) 2 project went live in October 2023. BEST is funded through the Council's UK Shared Prosperity Fund programme. The 18 month project will help SMEs achieve reductions in energy costs and greenhouse gas emissions, thereby increasing business resilience and adaptive capacity to meet net zero targets and support regional economic growth. 30 businesses will access advice and be supported to undertake an energy audit. Financial assistance is available, subject to business case, to support the implementation of decarbonisation plans, expected to deliver 220 tonnes of greenhouse gas savings.

Adaptation

17. An internal flood group led by the Lead Local Flood Authority has been set up and meet regularly. Meetings have taken place between the Council and the Environment Agency to ensure collaboration. There is ongoing work in relation to Team Valley and Metrogreen flood alleviation.

Woodlands and nature

18. To assess some of the benefits of trees and woodland within the Borough, in helping to mitigate and adapt to climate change, a tree canopy survey was

commissioned for Gateshead. Key outcomes from this study included an average tree canopy cover across the borough of 23.6%, giving a total annual benefit from total carbon storage, annual carbon sequestration, annual pollution removal and annual avoided runoff of £14.2 million, with the Council's own woodlands and trees annual benefits totalling £2.2 m.

19. To facilitate the Council's targets for tree planting and woodland creation, a successful bid was made to DEFRA's Woodland Creation Accelerator Fund to fund the appointment of two woodland creation officer posts for two years. The post holders started work in June and July. Ten sites have been identified for tree planting/woodland creation across the borough this winter 23/24 with funding secured for the planting of over 13,000 trees including 2 'tiny forests' and 8 other sites, 4 in East Gateshead and 4 in West Gateshead. This builds on the total of over 23,000 trees already planted, since the target of 100,000 trees by 2030 was set by the Council in November 2019.
20. With the staff resources and external funding to cover the cost of planting and maintaining the trees now in place, there is an urgent need to secure the vacant possession of Council land to allow woodland creation/tree planting schemes to progress in the coming years. If this land is secured it should be feasible to meet the Council's tree planting target. However, to meet the target of creating 250ha of new woodland by 2050 it will be necessary for the Council to work with NGO partners to secure additional non-Council owned land to create woodland on. To achieve this the Council will need to take a proactive approach to acquiring the necessary land.

Waste

21. In December 2018, the government published the Resource and Waste Strategy (RaWS) setting out ambitious targets for increasing the level of recycling across England, whilst seeking to minimise waste growth and prevent waste from being disposed of by landfill. Specifically, within this strategy were three key legislative changes which Government sought views on through two rounds of consultations (in 2019 and 2021).

These being:

- Extended Producer Responsibility for Packaging (pEPR)
 - A Deposit Return Scheme (DRS) on single use drinks containers
 - Consistency in household and business waste collections
22. The above are now often referred to as the Collection and Packaging Reforms (CPR) which are focused on ensuring that waste is reduced and recycling is increased.
 23. The Council is proud that no waste has been routinely sent to landfill in the past 10 years. Gateshead's residual waste is sorted for recyclables (and additional 2% recycling) including metals and wood, and the remaining waste gets taken to the energy from waste plant in Teesside. The garden waste is taken for composting and there is a good take up rate for this provision.

24. The Council promote the waste hierarchy, including reduce and re-use and provide links on the website on how to achieve this. In addition the Campground HWRC site hosted a pop up re-use shop on the 25th November 2023 and is exploring ways to increase this provision. Cycle access to Household Waste and Recovery sites has been introduced.
25. A behavioural change campaign is ongoing in relation to effective recycling which seeks to improve the current recycling contamination rate of 20%.
26. There is also ongoing communications around the safe and responsible way of disposing of vapes which is a costly and dangerous hazard locally and nationally for the Waste Collection Services due to batteries and possibilities of fires. The Council is aware of, and in support of the proposed ban on single use vapes.
27. National policy and guidance is being introduced including deposit return schemes and legislation for packaging reduction.

Communities and communications

28. Work with schools has begun and includes a pilot Climate Action Plan at XP Gateshead which is being led by the students and includes an energy audit. Other schools within Gateshead are progressing their climate actions and plans including tree planting and active travel initiatives.

Communications with our stakeholders about climate change has been ongoing and includes;

[From the industrial revolution to a green revolution - Gateshead Council](#)

[Clean Air Zone - applications for grants set to open - Gateshead Council](#)

[Gateshead recognised with award for carbon reduction - Gateshead Council](#)

Mine water heat pump and DEN on Moneybox [\(25\) Post | Feed | LinkedIn](#)

BBC Sounds: [Money Box - Heating the homes of the future - BBC Sounds](#)

[Active travel competition for Birtley children - Gateshead Council](#)

[What can you do to help Gateshead go carbon neutral? - Gateshead Council](#)

[Gateshead wins vital funds to help expand innovative heat networks - Gateshead Council](#)

[Gateshead Awards - Gateshead Council](#)

[Climate pledges at Gateshead school - Gateshead Council](#)

[Gateshead awarded nearly £1m in funding for active travel - Gateshead Council](#)

[Gateshead school going the extra mile during TravelWise Week - Gateshead Council](#)

[Zero carbon power shows the way ahead - Gateshead Council](#)

Updated Environmental Policy

Gateshead Council's Environmental Policy February 2021 (updated 2024)

Gateshead Council recognises the importance of our natural environment. We are committed to reducing the environmental impact of our operations and will support residents and businesses to do the same.

A thriving natural environment can deliver considerable benefits to our communities. In the same way, action on climate change can provide many local benefits to health and well-being, economic growth, social equity and cohesion, and the resilience of our communities. In taking action to improve our environment and reduce carbon emissions, we will seek to optimise these wider benefits.

Key Principles:

Climate Emergency

• Reduce the Council's operational green house gas emissions to carbon neutrality by 2030 (scopes 1 and 2)

- Ensure that all strategic decisions, budgets and approaches to decision making give consideration to a shift to ~~zero~~-carbon neutrality by 2030
- Support local organisations and our communities on the journey to reducing their carbon emissions by generating and sharing ideas, facilitating connections between groups and individuals, and providing an exemplar for other organisations to follow

Transport

- Work to further reduce the environmental impacts of staff travel, including reducing the need to travel, and promoting sustainable modes of transport
- Through specific initiatives, and through our strategic decisions we will support active travel, public transport improvements, and other approaches to decarbonise transport that will reduce carbon emissions, improve air quality, and contribute to sustainable access for all

Waste

- Minimise waste generated by the Council's activities
- Encourage households and businesses to minimise the amount of waste generated across the borough
- Apply the waste hierarchy of prevention, reuse, recycling, recovery and (only then) safe disposal

Procurement and Investments

- Support a shift to a green and just economy by seeking to procure products and services in an economically, environmentally and socially responsible manner
- Consider carbon and environmental impact in spending decisions to support the transition to a green and just economy

- Procurement and investments will support local organisations and service providers wherever feasible, retaining value within the local economy

Energy

- Continue to expand the use of clean low-carbon energy and heat across all the council's operations
- Proactively support the development of new low-carbon energy technologies, taking advantage of energy infrastructure and opportunities specific to Gateshead

Property, Land and Grounds Maintenance

- Minimise carbon emissions associated with the council's property portfolio – striving to achieve carbon neutrality across commercial and residential properties
- Optimise the potential for the council's land holdings to support biodiversity and our natural environment
- Work with partner organisations to increase tree planting in Gateshead, and maintain tree cover - increasing total tree cover to 17% by 2050
- Prepare a Local Nature Recovery Strategy with partner organisations to address the biodiversity emergency

We will monitor progress against the key principles of this policy. Annual reviews and updates will take account of relevant changes in legislation and other factors.

The policy will be made available on the council's website, and will be communicated to all employees, including as part of the induction process for new staff.

Updated April 2024