

Annex 1: Green Travel Policy Options Paper

Overview

Climate change is real and together we are committed to take action to halve our carbon emissions by the end of 2010. Our integrity and authority as an environmental leader is vested in our meeting this target.

The publication of these policy options expresses a major part of how Natural England and its staff propose to meet the challenge of meeting our carbon target. In reviewing the travel policies of a range of organisations it is obvious that our target requires us to go considerably further than most other public and private sector bodies are planning to.

We know that staff want to be at the forefront of tackling climate change and have the willingness to make significant cuts in their carbon emissions. We are already investing in new technologies but we know that our success hinges on giving ownership of the issue to our staff. We want low carbon actions and behaviours to be the norm, rather than the exception, in Natural England.

Staff consultation is critical to the success of this policy and, ultimately, our success in achieving our target. Our aim in engaging with staff is to not only get their agreement of the emerging policy but also seek their help in developing innovative solutions to the challenges we face.

We have listened to the concerns raised about the challenge of halving our carbon footprint, and we are aware that moving over to new lower carbon ways of working will be difficult for some staff and some parts of our business. We recognise that some staff and teams may need to make more changes to their ways of working than others, but we know that the introduction of a Green Travel Policy will have a positive impact on many of our ways of working.

We also recognise the request from staff for more information, advice and decision making tools on green travel options and we will develop these in parallel with the policy.

The options set out in this paper cover all of Natural England's business travel by its staff and the Non-Executive Board, including travel to meetings and to our customers. It does not include staff commuting to and from work and excess travel arrangements, or the carbon footprint of travel by our partners and suppliers. These issues may be considered in the future.

The options have been developed following the staff survey and staff conferences, where the organisation's appetite for developing new low carbon ways of working was demonstrated. The options have also taken into account initial discussions with the unions and with staff during the April Quarter 4 transition workshops.

PART 1 BACKGROUND

1 Why do we need a Green Travel Policy?

Natural England needs a Green Travel Policy for a number of reasons. These are set out below:

1. Addressing climate change

Climate change poses the biggest long-term threat to Natural England's purpose to ensure that the natural environment is conserved, managed and enhanced for the benefit of present and future generations. There is an urgent need to reduce greenhouse gas pollution if we are to avoid potentially catastrophic impacts on the natural environment.

Natural England is committed to action on both mitigation and adaptation and we have staked our credibility and authority as a leading environmental body in achieving our carbon reduction target.

2. A distinctive public body

As an environmental leader we will demonstrate our commitment and action to protecting and enhancing the natural environment. Addressing our own operational carbon footprint is an important action which demonstrates our commitment to addressing the most serious long term risk to the natural environment.

The target in our Strategic Direction is to reduce the greenhouse gas pollution from our buildings and our travel by 50% by the end of 2010, and have committed ourselves to demonstrating that both significant cuts in carbon are possible whilst, at the same time, not reducing our customer service.

Although our carbon footprint is relatively small in comparison with other organisations and businesses, we have set ourselves a target that is achievable but also illustrates the scale of the challenge. Meeting this target will demonstrate what is possible to both stakeholders and customers.

3. Sustainable ways of working

The options in this paper represents some of the actions we can to take to address the most important area of our sustainable working in Natural England – reducing our carbon footprint.

The Green Travel Policy that emerges from our discussion of these options will be part of a suite of emerging programmes and policies that will shape the way in which we work in the future.

We recognise that Natural England can do a lot by providing new technologies such as more efficient pool cars and teleconferencing facilities and we have established transition programmes to invest in these. However, a significant contribution must be made by staff taking responsibility for the way that they work in order to reduce either the need to travel or use more sustainable modes.

To meet our target, we have prioritised both our energy consumption and our business travel through the Sustainability Transition project. In addition to this developing Green Travel Policy, Natural England is also taking forward to two main strands of activity under this project to reduce our carbon footprint:

1. Estates – implementing a range of investment programmes across the organisation to improve the energy efficiency of our premises and encourage energy efficient ways of working; and,
2. the Evidence Base - establishing a robust carbon footprinting methodology and ongoing monitoring of progress.

2 **Scope**

The Policy Options cover all Natural England business travel by all our staff and the Non-Executive Board, including travel to meetings and to our customers. They do not include the current Excess Travel arrangements, supplier travel nor staff commuting to and from work. Natural England may investigate options to address these issues in the future.

3 **Underpinning principles**

Equality and diversity

We recognise that there are equality and diversity issues in the implementation of some of these options. An initial Equality Impact Assessment has been undertaken and the impacts on different equality groups is presented in Appendix 3. A full version of the initial screening is available on request.

Carbon reduction

The primary purpose of the Policy Options are to reduce our travel carbon footprint. This will be achieved by reducing the need to travel where practical and where effective alternatives, such as video-conferencing, are available. However, we recognise that such alternatives may not be available or appropriate, particularly when it comes to meeting with our customers and stakeholders. The Policy Options therefore also seek to drive low carbon travel options where travel is required.

The Policy Options are based on a hierarchy of sustainable options with the least carbon intensive being the preferred, and therefore most incentivised option. The hierarchy is set out below:

1. reducing the need to travel through the use of video and teleconferencing
2. where travel is required, selection of the most sustainable option (best first):
 - a. Walk or cycle
 - b. Public transport
 - c. Car

- d. Taxi
- e. Air

Staff engagement

Meeting the Natural England carbon reduction target will require the full support of all staff in both the development and the delivery of the final Green Travel Policy. We recognise that the final Policy may have different impacts for different individuals and teams and therefore a core principle is that there will be adequate time and opportunity for staff to express their views and also submit alternatives to the policies set out in this paper.

A number of discussions have taken place with staff through the Quarter 4 workshops during April which have helped to refine our understanding of staff expectations and issues with regards to the development and delivery of this policy. Workshop reports have been incorporated into the range of policy options presented here. Overall staff have been very positive about managing our carbon footprint and welcomed their ongoing involvement in the development of the final policy.

The final Policy must:

- ensure that health and safety and equality and diversity issues are fully addressed
- recognise the different roles and responsibilities of staff across the whole organisation
- take into account the different reasons for staff travel eg. internal meetings, customer meetings etc.
- achieve a balance in the level of change in the ways of working between internal facing and customer facing staff
- enhance our level of customer service
- within the framework of this Policy, give staff ownership of their own travel decisions, without imposing extra bureaucracy on staff
- be supported by a range of information, tools and equipment to support decision making and enable staff to implement the policy e.g. meeting planning guidelines, carbon calculators etc.
- ensure clarity on how decisions are made at the local and team leader level

We also need to be able to monitor progress towards achieving our carbon reduction target at both an organisational, team and individual level. This should be presented as close to a 'real-time' reporting system as practical.

Natural England will need to develop an implementation plan to ensure that each policy is put into practice once the final draft of this Policy is agreed and share this with staff to ensure they have adequate foresight of the proposed changes in ways of working.

Costs and remuneration

Natural England recognises that the introduction of a Green Travel Policy is likely to incur costs upon the organisation but also lead to potential cost

savings through less travel. It is the purpose of this policy to drive down carbon emissions, therefore the financial aspects of each policy are not being taken into account at this stage of the policy development process.

Likewise, we recognise the issue of remuneration for the costs incurred by staff using their own vehicles whilst travelling on Natural England business. This has been raised by both the unions and during the Q4 workshops. Our intention is to firstly decide on the policy before investigating any potential increase or decrease in travel and subsistence rates. The policy options do recognise where there is a potential role for financial rewards and disincentives, although indicative rates are not presented at this point.

Natural England will investigate the tax and national insurance implications of changing the rates and allowances above or below those set out by Revenues & Customs as well as the feasibility of changing the i-Expenses system.

4 **Predicted benefits**

The benefits of implementing a Green Travel Policy are predicted to be:

Environmental

- a significant contribution to Natural England carbon reduction target as travel makes up 53% of the total 2005-06 carbon footprint
- a reduced Natural England contribution to UK congestion, air pollution and carbon emissions

Reputational

- demonstration of Natural England's environmental leadership to contribute to becoming an employer of choice and to ensure our integrity with our customers the public and private sector by managing our own carbon emissions

Organisational

- supporting Natural England's 'one organisation, one purpose' strategic shift through a common objective
- links with Natural England's flexible benefits options in the Reward Strategy

The Policy may also contribute to:

- improved physical and mental health of staff
- improved staff recruitment through our improved reputation as a low carbon organisation.
- work-life balance

5 **How this paper is set out**

This paper presents a range of options on staff business travel designed to reduce the carbon footprint of the organisation.

Alongside this options paper are two appendices:

- Appendix 1 provides the supporting evidence base upon which the options have been based.
- Appendix 2 presents the staff engagement process in detail.

6 **The staff engagement process**

The final Policy will be developed in partnership with the unions and the full engagement and consultation of staff.

There will a number of events and opportunities through which staff can comment. These will be advertised as staff notices and in the Cascade Briefings.

There is a dedicated email address through which staff can submit comments: greentravel@naturalengland.org.uk

7 **The timeline**

The Policy Options and Staff Engagement Plan was agreed by the Natural England Executive Board on 25 March 2008.

The Executive Board and Non-Executive Board will receive an update on progress at the end of April. We aim to present the final Policy to the Non-executive Board at the end of June 2008.

PART 2 **TRAVEL MODE SPECIFIC POLICY OPTIONS**

A **Tele and Video-Conferencing**

Natural England will develop tele and video-conferencing facilities at each of its major sites in line with the 'Smarter ways of working' investment programme managed by KMIS.

TV1 The implementation of this Policy will not begin until these facilities are in place and staff are adequately trained in their use.

B **Walking & cycling**

Walking and cycling are the most sustainable travel options but Natural England recognises that these transport options will not be appropriate for the vast majority of business travel staff do.

WC1 Natural England will review the current reimbursement rates for walking and cycling to incentivise their use. To be eligible for any cycle allowance staff must have their own cycle insurance.

WC2 Natural England will investigate the introduction of an annual cycling payment to partly cover the cost of cycle safety equipment (e.g. helmets, locks, high visibility clothing etc.) for staff who regularly travel by bicycle.

WC3 Natural England will introduce a salary sacrifice scheme for bicycle purchase.

WC4 Natural England will review all its offices and their cycle facilities with a

view to improving them for cycle users where possible.

WC5 Natural England will support the creation of an internal Cycle Users' Club as a consultative group for future cycle policy.

C Public transport

PT1 Public transport should be the first option where travel is required and walking or cycling is not an option.

PT2 The timing of meetings should enable as many staff as possible to travel by public transport. Clear meeting start and end times should be communicated as soon as possible to enable advance travel booking. The location of meetings should be as close to public transport hubs (e.g. a railway station) as practicable.

PT3 Natural England will promote the use of public transport by providing access information on public transport access and walking and cycling routes from public transport hubs to and from its offices. The senior responsible officer for each office will be responsible for keep this information up to date. Natural England will also provide a web link from its front page to the transportdirect website (www.transportdirect.info)

PT4 Natural England will investigate the use of discounted public transport passes for staff for business and private use.

D Road Vehicles

Natural England recognises the essential role that road vehicles play in meeting our objectives. It is not the intent of the final Policy to prevent staff from fulfilling their day-to-day roles by curtailing their use of cars to visit customers and stakeholders. However, it is within the remit of this consultation to introduce options that prevent the use of road vehicles when more sustainable options are available and suitable.

In this section the policy options have been developed under three main headings:

1. policy options on future Natural England investment in its own fleet and hire cars
2. policy options that introduce organisation-wide mileage and carbon management systems to ensure that Natural England meets its carbon reduction targets
3. policy options on influencing the choice for lower carbon road vehicles whilst, at the same time, ensuring other more sustainable modes of transport are utilised where they are available.

RV1 The use of cars will be the first option for travel where public transport is not viable or where it can be demonstrated that the carbon emissions per person in the vehicle is lower than that of public transport (in most cases this is a car with four people travelling).

NE Road Vehicle Investment Policies

Pool, fleet and hire cars

Natural England recognises the variation in pool car availability across its estate and the differences in the age and environmental quality of its existing fleet. We are currently reviewing the pool car fleet to define its optimal size and the location of vehicles. We are also reviewing our hire car contract arrangements with a view to moving towards more lower carbon vehicles and more flexible arrangements, without passing on the carbon cost to our suppliers.

- IN1 Natural England will develop a fit for purpose pool car booking and management system.
- IN2 Natural England will only purchase or lease pool cars with CO₂ emissions of 130g/km or below unless there is an identified need for a specialist vehicle that cannot meet this requirement.
- IN3 Future iterations of the Green Travel Policy will introduce further CO₂ limits on pool cars as fuel efficiency technologies improve.
- IN4 Natural England will, where possible, hire cars with carbon emissions below 130g/km. Where this is not possible, the vehicle with the lowest carbon emissions will be hired.
- IN5 Natural England will undertake a review and initiate trials to reduce the carbon footprint of its specialist vehicles and equipment on its NNR estate

PUS

- IN6 Natural England will phase out the PUS scheme. A plan will be developed for phasing it out which minimises disadvantage to staff and cost to Natural England through its current contracts.
- IN7 Those PUS vehicles still under contract will be returned to the supplier or, where cars have relatively low emissions, added to the Natural England pool car fleet for the remainder of their contract.
- IN8 Natural England will ensure that arrangements are in place to provide for individual members of staff to have access to a car in order to enable them to fulfil their role. There will be carbon emission limits on the vehicles provided.

Allocation Policies

Mileage allocation system

- MA1 Natural England will introduce a team mileage cap in order to meet the commitment to reduce our travel carbon footprint by 50%. The cap will be placed on car mileage initially, but developed to include other modes of transport over the coming year.

- MA2 Each Director and Head of team will be allocated a grey fleet mileage budget that their teams will be able to 'spend' over the year. Natural England will investigate appropriate rewards for teams demonstrating significant reductions below the cap each year.
- MA3 The CEO's, Executive Directors', Directors' and Heads' of team end of year performance assessment will be linked to staying within their allocated cap.
- MA4 The mileage allocation to each Director or Head of team will be set using an agreed methodology at an organisational level.
- MA5 Each Director and Head of team are given the freedom to allocate these miles between their teams in consultation with their staff based upon their profile and business need (see below). This will enable regional or team specific issues to be resolved and also stimulate innovative approaches to reducing car mileage.
- MA6 The mileage budget will be monitored and reported on a monthly basis as staff make their travel claims in the usual way. Forecasting will identify staff and teams that are likely to exceed their allocation so that mitigating action can be implemented early in the process.

Or

Carbon allocation and trading system

- CA1 Natural England will introduce a carbon allocation and trading system to meet the commitment to reduce our travel carbon footprint by 50% by 2010. A cap will be placed on the total carbon emissions of car travel for Natural England business initially, but extended to include other modes of transport over the coming year.
- CA2 Each Director and Head of team will be allocated a carbon budget that their teams will be able to 'spend' over the year. The allocation at the organisation-wide level will be based on an agreed methodology. Those teams that do not use their allocation will be able to 'sell' it to other teams who have exceeded their allowance through the NE carbon market. The price of carbon will depend on the level of supply and demand.
- CA3 The CEO's, Executive Directors', Directors' and Heads' of team end of year performance assessment will be linked to staying within their allocation of carbon. Team performance will be partly assessed through the amount of carbon savings they have made and the price of carbon.
- CA4 Each Director and Head of team are given the freedom to allocate carbon allowances between their teams in consultation with their staff based upon their profile and business need (see below). This will enable regional or team specific issues to be resolved and also stimulate innovative approaches to reducing road vehicle carbon emissions.
- CA5 A system to enable the monitoring and reporting of the team carbon budgets will be developed and ready prior to implementation of this policy.

Influencing low carbon choices

- CH1 Natural England will introduce a daily mileage limit for grey fleet vehicles being used for travel to internal meetings with the exception of when that travel is to public transport hubs e.g. train stations, for onward travel.
- CH2 Natural England will investigate the appropriateness of a daily car mileage limit for external meetings.
- CH3 Natural England will investigate increasing passenger rates per mile for each passenger carried.

Sliding scale of payment based on mileage allocation according to business need

- CH4 Natural England will introduce a scale of payments for staff using their own vehicles whilst travelling on business. The total amount that staff can claim each year at the standard mileage rate will be based on their role and the frequency that the business requires the individual to travel. Staff will be categorised into 'low', 'medium' or 'high' on this basis with an annual mileage cap for each category. Staff will receive the standard mileage rate for business travel up to the mileage cap, after which point they will receive a lower rate to cover fuel costs.
- CH5 The category to which a member of staff is allocated to will be signed off by a Director or Head of team, (ensuring that the allocations do not exceed the team cap should the mileage or carbon allocation system above is introduced).
- CH6 Any change of role by a member of staff will require a reassessment of their category of need.
- CH7 Exemptions will be made for staff with mobility issues

Sliding scale of payment based on vehicle carbon emissions

- CH8 Natural England will investigate increasing the mileage thresholds of the above policy for staff using their own lower carbon emission vehicles for business purposes. This will be based on either the car's VED banding or our own carbon emission thresholds.

Or

- CH9 Natural England will investigate a system that reimburses staff at different rates according to the carbon emissions of their vehicle. This will be based on a basic mileage rate for those grey fleet vehicles above an agreed carbon emissions limit. Only cars below this limit will be able to claim a higher rate.
- CH10 Future iterations of this Green Travel Policy may reduce the mileage allowances for each payment category or the carbon thresholds in the policies above in order to achieve a 50% reduction in carbon emissions from the baseline.

E **Taxis**

- TX1 Before travelling staff must investigate all public transport travel options available to them. The Natural England Intranet will provide information on public transport, cycling and walking access to each of its offices and other sites. Staff should use the Transport Direct website for detail on bus and other public transport routes (www.transportdirect.info) to other locations.
- TX2 Reimbursement for taxi journeys is only permissible in conjunction with using public transport (e.g. taking a taxi to the station for onward travel) and once public transport options are shown to be unsuitable.
- TX3 Natural England will introduce a maximum distance for a single taxi trip journeys.
- TX4 There will be no reimbursement for hiring of taxis in London between 7am and 8pm.
- TX5 Exceptions to the taxi policy will apply for staff with mobility issues or in cases where there is a significant health and safety risk.

F **Air travel**

- AR1 Air travel will only be allowable where the same outward journey by train exceeds 7 hours.
- AR2 Flights will only be allowed with the express permission of an Executive Director, or in the case of an Executive Director, the CEO..
- or
- AR3 There will be a complete moratorium on domestic air travel in mainland England and to locations served by Channel Tunnel rail links.
- AR4 Flights will only be allowed with the express permission of an Executive Director, or in the case of an Executive Director, the CEO..

G **Roles and Responsibilities and Scheme of Delegation**

- RR1 Individual's responsibility (including the Non-Executive Board):
- embrace with Natural England's Green Travel Policy
 - obtain the appropriate approvals
 - submit claims and seek approvals promptly
- RR2 Chief Executive, Executive Directors, Directors and Heads of team responsibility:
- support the implementation of the Green Travel
 - ensure their direct reports and teams carry out their responsibilities as set out above
 - demonstrate leadership through their own commitment to low carbon business travel
 - approve costs and allowances in line with the Green Travel Policy

- consider the carbon, time, health and safety and equality and diversity implications of giving any permissions identified in this policy
- work with their teams in the development of the grey mileage allowance system and ensure it is implemented fairly and in a way that meets the business' needs.

RR3 Chair

- approve costs and allowances for the Non-Executive Board in line with the Green Travel Policy
- consider the carbon, time, health and safety and equality and diversity implications of giving any permissions identified in this policy to the Non-Executive Board

APPENDIX 1: GREEN TRAVEL POLICY EVIDENCE BASE

Our carbon footprint

The carbon footprint of the three founding bodies in 2005-06 was made up as follows:

Emission source	Carbon (tonnes per year)
Estate energy use (heating, electricity etc.)	3853
Grey fleet	2247
Rail	709
Pool cars	831
Hire cars	89
Private Use Scheme	149
Bus/tube	12
Taxi	14
Air	271

Travel was responsible for almost 53% of the total carbon footprint.

Work is currently underway to determine the carbon footprint for 2006-07 and 2007-08.

Staff travel culture and practices

A survey undertaken in November 2007 identified some distinct travel practices and cultures within Natural England. Specific results are reflected in the mode-based evidence presented below, but headlines from the research showed:

- senior members of staff had higher total carbon footprints compared to team members and team leaders due to the total distance they travel. However, their carbon footprint per KM travelled was lower by virtue of their regular use of public transport.
- the carbon footprints of regional teams is, on average, 13% higher than those of national teams
- 21% of all travel was to meet with external customers and stakeholders – almost 79% of all travel was for attendance of internal meetings (i.e. with other Natural England staff in other Natural England offices)

- there is a legacy of travel culture from the founding bodies, with travel mode choice being based upon the founding body travel policy, the location of offices and the new roles that staff undertake in Natural England.

Walking & cycling

The total distance travelled by staff using bicycles between October 2007 and March 2008 was 1640 miles. The average distance per journey was 9.98 miles. Although these distances are very small in comparison with other travel modes, it does demonstrate the commitment of a small contingent of staff to use more sustainable transport modes, even during the winter months.

The current cycle rate is 25p per mile travelled. There is currently no walking rate. Increasing the cycling rate to that of grey fleet (40p per mile) as suggested by the Q4 workshops would give parity with this transport mode. Increasing rates or introducing new rates above those set by HMRC may have tax and National Insurance implications for staff. Although the rates were reviewed prior to the Budget in March 2008 to incentivise lower carbon forms of travel, no changes were proposed.

As with all forms of business transport there is a health and safety risk of using a bicycle for travel. Although the deaths from cycling have fallen considerably over the past decade (down by 42% from the 1994-98 baseline¹) there is also a perceived risk. Some organisations provide staff with safety equipment and training whilst others provide an allowance to cover the cost of safety equipment.

A salary sacrifice scheme for bicycle purchase was a regular request from Pay road shows in November 2007. OD is currently in discussion with SSD about implementing a scheme. The scheme will require a tender and there will be an initial set up costs. Through the scheme staff will be able to save between 40-50% of the purchase cost of a bicycle. Apart from some initial set up costs and administering the scheme, there is no financial burden on the employer.

The Natural England intranet and internet site does not adequately contain information on accessing our offices by walking, cycling or using public transport. The staff survey report identified the lack of such information as being a barrier to using these travel modes as well as a lack of cycling facilities at some Natural England offices.

Public transport

Rail contributed 709 tonnes or just under 14% of the travel carbon footprint of the three founding bodies for 2005-06. Bus and tube travel represented just 12 tonnes or less than 1% of the footprint.

Transport Direct is a Government funded initiative to enable route planning using public transport and walking/cycling (www.transportdirect.info). A number of Government departments and regional Government Offices already link their websites to this site in order to encourage more sustainable travel.

The table below shows the distance of Natural England offices from public transport (rail, coach and, where appropriate, tube and light rail). It does not show local bus links.

¹ DfT *Road Casualties in Great Britain 2006*

Region	Office	Distance (miles)		
		Train station	Coach station/stop	Tube/light rail
North West	Bridgewater House, Manchester	0.1	0.2	
South East	Victoria House, Guildford	0.1	1.8	
East Midlands	The Maltings, Grantham	0.2	0.1	
East	Vancouver House, Kings Lynn	0.2	0.2	
South West	Renslade House, Exeter	0.2	0.7	
East	Harbour House, Colchester	0.2	1	
South East	Fenlock Court	0.2	6.7	
Yorkshire	Bull Ring House, Wakefield	0.3	0.2	
London	Ashdown House	0.3	0.4	0.3
North West	Pier House, Wigan	0.3	0.4	
East	Thorpe Road, Norwich	0.3	0.9	
South East	Phoenix House, Lewes	0.3	4.3	
National	East Parade, Sheffield	0.4	0.3	
East	Northminster House, Peterborough	0.4	0.3	
South West	Pydar House, Truro	0.4	0.3	
South West	Estuary House, Exeter	0.4	0.9	
South East	Sterling House, Maidstone	0.5	0.2	
South West	Government Buildings, Dorchester	0.5	0.5	
East	Eastbrook, Cambridge	0.5	1.2	
South East	Olantigh Road, Wye	0.5	3.5	
South West	Riverside Chambers, Taunton	0.6	0.2	
North West	Agricola House, Penrith	0.6	0.6	
London	Devon House	0.6	0.7	0.1
North West	Juniper House, Kendal	0.6	1.3	
South East	Government Buildings, Reading	0.7	1.1	
North West	Electra Way, Crewe	0.7	1.2	
South West	John Dower House, Cheltenham	0.9	0.1	
Yorkshire	Northallerton Business Park, Northallerton	1	7.7	
East	Government Buildings, Bury St Edmunds	1.2	0.7	
South East	Coldharbour Farm, Wye	1.2	3.4	
London	Exchange Tower	1.3	0.4	0.3
West Midlands	Government Buildings, Worcester	1.3	1.8	
West Midlands	Woodthorne, Wolverhampton	1.4	2.6	
Yorkshire	Government Buildings, Lawnswood, Leeds	1.6	2.3	
South East	Southampton Road, Lyndhurst	1.9	0.4	
East Midlands	Ceres House, Lincoln	1.9	1.9	
Yorkshire	Genesis, University Road, York	2.1	2	
South West	Government Offices, Westbury on Trym, Bristol	2.2	2.8	
East Midlands	Government Buildings, Nottingham	2.4	2.1	
East	Ham Lane, Peterborough	2.5	2.6	
South West	Slepe Farm, Wareham	2.8	2.4	

North East	Quadrant, Newcastle	3.7	3.5	
North West	Barton Hall, Preston	3.8	3.7	
West Midlands	The Stable Block, Shrewsbury	3.9	4	
East Midlands	Endcliffe, Bakewell	6.6	0.7	
South West	Prince Maurice Court, Devizes	7.6	1.2	
Yorkshire	Asquith House, Leyburn	15.3	9	

The majority of Natural England offices (60%) are within 1 mile of a railway station and all but three within 5 miles. Coach links to Natural England offices are good, with 23 (49%) being within 1 mile of a coach station or coach stop, and only three further than 5 miles away. Note that staff at Asquith House, Leyburn are due to be relocated to Northallerton later this year.

Road vehicles

Average carbon emissions from current models is 199.5 g/km (based on Vehicle Certification data of 2870 models). However this figure is an average of all models currently available on the market and not the average of all cars sold. This is shown in the table below which demonstrates the improvement in carbon emissions from cars over the past decade.

Year	Average emissions g/km	Improvement on previous year
1997	189.8	-
1998	188.4	0.70%
1999	185	1.80%
2000	181	2.20%
2001	177.6	1.90%
2002	174.2	1.90%
2003	172	1.20%
2004	171.4	0.40%
2005	169.4	1.20%
2006	167.2	1.30%

The table below shows a significant shift in car manufacturing to lower emission vehicles

VED Band	CO ₂ emissions	2000 - % new cars	2006 - % new cars
A	< 101 g/km	0	0.1
B	101 – 120 g/km	0.1	4.7
C	121 – 150 g/km	19.2	31.9
D	151 – 165 g/km	23.8	24.2
E	166 – 185 g/km	22.7	17
F	186 – 225 g/km	24	14.6
G	> 225 g/km	11.3	7.5

Source: Society of Motor Manufacturers & Traders, March 2007

The number of new cars manufactured with relatively low emissions has increased significantly over the past year. Current VCA data² identifies 214 models that have carbon emissions of 130g/km or below, but only 6 that are 120g/km or below. These are categorised by fuel type in the table below whilst a full list can be found at N:\Transition\Transition Projects\Sustainability\Green Travel Policy\New cars by carbon.xls

	Diesel	Petrol	Alternative Fuels
Models under 120 g/km	6	0	0
Models under 130 g/km	157	49	2

Pool and fleet cars

Pool cars are available at most Natural England main offices. The existing pool car fleet is made up as follows:

Region	Number of Pool cars	Average age as of 31 March 2008 (months)	Staff per pool car	Average CO ₂ emissions of vehicles (g/km)
East	33	68	6.2	142
East Midlands	10	53	14.9	150
North East	5	58	18.8	146
North West	4	37	47.5	163
South East	15	48	14.2	140
South West	31	60	10.3	146
West Midlands	11	58	15.5	153
Yorkshire	11	40	16.1	148

Any reduction in grey fleet and hire car mileage is likely to shift onto higher demand for pool cars. This needs to be assessed as part of the review of pool cars.

NNR road vehicle fleet is made up as follows:

Region	Number of vehicles	Average CO ₂ emissions of vehicles (g/km)	Average age (months) as of 31 March 2008
East	18	207	74
East Midlands	4	225	69
North East	9	159	63
North West	9	244	96
South East	13	246	54
South West	24	249	97
West Midlands	9	259	70
Yorkshire	8	231	86

Further research is underway developing the carbon baseline of specialist vehicles such as tractors and ATVs.

² See www.vcacarfueldata.org.uk/search/search.asp

Hire cars

Hire cars represent 2% (89 tonnes) of the 2005-06 travel baseline. Data from October 2006 - March 2007 shows how the average carbon emissions of each hire car is 160 g/km. The average monthly mileage of cars hired by Natural England during this period is 15672 miles, making the average carbon emissions each month from hire cars 4.03 tonnes or 48.36 tonnes/year. The 2006-07 footprint is therefore just over half that of the 2006-07 footprint. More detailed data from 2006-07 can account for some of the variance between this and the baseline year as well as the 2005-06 using a different conversion factor.

Month	Number of Days Hire	Mileage	Average CO2 Emissions of cars hired
Oct-06	148	16731	160.2
Nov-06	213	24604	155.61
Dec-06	No data	No data	No data
Jan-07	113	11825	162.74
Feb-07	130	11243	158.96
Mar-07	93	15097	164.09
Apr-07	66	8874	159.32
May-07	76	14455	158.79
Jun-07	134	18301	159.68
Jul-07	122	19922	159.4

The average cost per car per day was £20.93

Limiting hire vehicle emissions to 130g/km would save just under 0.8 tonnes of carbon per month or 9 tonnes of carbon per year. Natural England research into the current services being offered by a selection of the main car hire companies has shown that two of the three companies approached have fleet that includes vehicles of under 130g/km. However, in one case this availability was restricted to a few vehicles at major airports, whilst the other cannot guarantee that a low emission vehicle would be available when requested. The market place is at an early stage with regards to introducing low emission vehicles and, unless demand increases for these types of vehicle, they are likely to remain a relatively small part of the fleet. Natural England will re-engage with the industry once it has a better understanding of the types, locations and level of demand it will require in the future.

PUS

Natural England currently has 56 PUS vehicles (figure as at January 2008). The average carbon emissions of the PUS fleet is 134g/km. PUS accounted for 149 tonnes of carbon (3% of the travel footprint) in the 2005-06 baseline. In 2006-07 PUS vehicles travelled 346,618 miles and had a carbon footprint of 116 tonnes (using the same Defra methodology). Average mileage per car was 6190 and the range 0 to 21,394, although this also includes staff on long term sickness and those that ended their lease partway through the year. In all 23 vehicles travelled less than 5000 miles during 2006-07.

The PUS scheme contracts of the founding bodies have been extended until a policy decision is made on the future of the scheme. New agreements were continued up

until January 2006 on a 4-year contract. The table below shows the current status of contracts with respect to their expiry date.

		2008-09				2009-10			
	Already expired	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4
Number of contracts expiring	16	0	1	5	6	0	1	24	3

A review of the PUS scheme will examine options for moving some existing contract cars into the Natural England fleet.

Grey Fleet

Grey fleet is the use of an employee's own car for travel on business purposes. It does not include staff commuting to and from their workplace. On average, grey fleet tends to be older and more polluting than pool and hire cars, but no data is yet available on the age and emissions of the existing Natural England grey fleet.

The Natural England survey of staff attitudes and behaviours to business travel identified that the first choice travel mode for a significant proportion of staff (31%) was using their own car for business purposes.

In the 2005-06 baseline grey fleet made up the largest proportion of travel emissions (52%) and emitted 2247 tonnes of carbon.

Mileage and carbon allocation systems

Evidence shows how the introduction of stringent and restrictive policies (perceived or otherwise) without the consultation and input of staff often lead to failure or perverse outcomes. Introducing an allocation scheme and enabling staff to influence how the mileage is distributed between themselves and their colleagues may be more likely to succeed as staff feel empowered and have ownership of their own carbon footprints. Staff may be more likely to support such a scheme if there are financial rewards or an element of competition built in, although there are equality and diversity implications associated with this.

Mileage allocation system

The mileage allocation system works on the principle of limiting car travel to 50% of that of the baseline year in order to meet the target. For example, the grey fleet mileage of the three founding bodies in 2005-06 was 6,842,330 miles, therefore to reduce the carbon emissions by 50%, grey fleet mileage will need to be reduced to 3,421,165 miles.

Initial trials suggest a methodology based on 50% of the grey fleet baseline allocated on an equal basis to each member of staff should be the initial starting point e.g.

- a. grey fleet miles from the 05-06 baseline = 6,842,330 miles
- b. 50% of this baseline = 3,421,165

- c. allocated to 2500 staff = 1368 miles/year
- d. therefore a region of 112 staff will receive an allocation of 153,216 grey fleet miles.

The methodology is capable of incorporating a weighting system to ensure that, for example, regions with a large geographic area and poor public transport links receive a greater share of the allocation.

Carbon allocation and trading

The carbon allocation system follows the same principles but is based on emissions rather than distance travelled. It therefore introduces the opportunity to meet the carbon footprint through introducing lower emission vehicles rather than wholly focusing on limiting mileage. For example, the carbon footprint of grey fleet for the three founding bodies in 2005-06 was 2247 tonnes. To meet the 50% target this will need to be reduced to just over 1123 tonnes. If we assume that the average Natural England grey fleet emissions are 204 g/km (the Defra 'standard' for grey fleet emissions per km) then the total mileage to meet the target would be 3,421,165 as above. However, if the average emissions of the grey fleet were reduced to 130g/km then the organisation would be able to travel 5,371,229 miles and still be within the carbon target.

In addition, the introduction of a trading system offers the opportunity for further innovation, particularly if this is linked to staff rewards. Carbon trading systems are currently being operated on a limited level across the UK with the most high profile being those being trialled by the RSA Carbon Ltd programme (see www.rsacarbonlimited.org)

Influencing low carbon choices

The carbon footprint of grey fleet, means this is a priority for action in the Green Travel Policy. However, it is recognised that the use of cars is often necessary for visiting our customers and stakeholders. The 2005-06 data gives an annual average grey fleet mileage per employee of 2738 miles. There is some significant variance with some staff not travelling at all using grey fleet and a significant proportion travelling in excess of 10,000 miles. Analysis of travel claims during this period show the breakdown of staff into different annual mileage categories

Annual mileage claim	% of staff	Average annual claim
Zero	19	£0
1 – 500 miles	33	£70
501 – 1000 miles	20	£262
1001 – 5000 miles	13	£755
5001 – 10,000 miles	7.5	£2479
10,000+ miles	7.5	£4887

From this analysis 81% of Natural England staff use their own car at some point during the financial year for business travel, although the significant proportion of these travel less than 1000 miles a year. It is assumed that the 2005-06 baseline data reflects travel by grey fleet as a business need rather than a convenience for staff.

The carbon footprint from the 2005-06 can be allocated on the basis of the data set out above as follows:

Mileage	Number of staff	% of total footprint	Allocation of 2247 tonnes footprint
1 – 500 miles	822	3	67
501 – 1000 miles	498	5	112
1001 – 5000 miles	335	15	337
5001 – 10,000 miles	187	21	473
10,000+ miles	185	56	1258

This distribution complies with the Pareto principle i.e. that around 20% of staff are responsible for 80% of our grey fleet carbon emissions. Policy and support therefore needs to be targeted at the high users of grey fleet if Natural England is to meet its 50% reduction target.

Sliding scale of payment based on mileage allocation according to business need

A system of financial disincentives by altering the mileage claim rates can be developed to encourage such reductions in grey fleet mileage. By combining some of the mileage categories together, it is possible to calculate the average annual mileage to achieve a 50% reduction in carbon emissions from grey fleet.

'User'	Number of staff in user category	Revised carbon footprint (tonnes)	Average maximum mileage per member of staff
Low 1 – 500 miles	822	33	122
Medium 501 – 5000 miles	833	224	819
High 5001 +	372	866	7089

Under this system staff would be able to claim a standard mileage rate up to their maximum. Any business mileage in excess of this maximum will be paid at a lower rate. However, it is difficult to estimate a monetary value where it becomes a financial disincentive in using grey fleet, although this value is likely to be somewhere around the cost of expenditure on fuel. This will require further development. The mileage cut off also needs to be lower than the average in recognition that some staff are likely to exceed this figure (even though payment will be at the lower rate) to ensure that travel is kept within the carbon target.

Note that these figures are given as an example only and should be considered alongside the travel data for 2006-07 which will be able to give a further guide on mileage allocations for the purposes of this Policy.

Variations on this policy can be made to enable greater reward for staff using low carbon fleet. This is examined below:

Sliding scale of payment based on vehicle carbon emissions

The average carbon emissions from existing models is 167.2 g/km (for new cars in 2006). Natural England grey fleet is assumed to be older but, for the purposes of this example, we can assume that it is around this figure (i.e. staff may buy lower emission cars by already being switched onto green issues).

Therefore the existing grey fleet emits 28.5% more carbon than fleet under 130g/km i.e.

- to do 100 miles in a car with the average emissions of 167.2 g/km would emit 26.92 kg of carbon
- to do 100 miles in a car with emissions of 130g/km would emit 20.93 kg of carbon

Thus a car with emissions of 130 g/km could travel 128.65 miles and emit the same amount of carbon as one with average emissions travelling 100 miles. On the basis of data the average maximum mileage by user before the rate drops to the lower rate per mile can be calculated for staff using cars with emissions of 130 g/km or lower as follows:

'User'	Average maximum mileage per member of staff	Threshold mileage for moving from the higher to lower rate per mile for a car of 130 g/km or under
Low 1-500 miles	122	156
Medium 501-5000 miles	819	1048
High 5001+	7089	9074

By way of example, if we assume that the higher rate is 40p per mile travelled before moving to the lower rate, the following table shows the financial benefit each user would receive by using a car of 130g/km or lower.

'User'	Benefit
Low 1-500 miles	£13.60
Medium 501-500 miles	£91.60
High 5001+	£794

It is therefore only of significant benefit for high users to invest in a low emissions vehicle, although there are savings for all users through lower fuel costs and these engines tend to have a higher mpg than standard vehicles.

The proposed methodology above proposes rewarding the use of lower emission vehicles. The following methodology proposes disincentivising the use of higher emissions vehicles and is based on the same methodology introduced through the London Congestion Charge.

The central London Congestion Charge will, from October 2008, include a new CO2 Charge for cars with the highest greenhouse gas emissions and a low CO2 Discount for cars with the lowest greenhouse gas emissions. The CO2 Charge aims to discourage people who continue to drive in the zone from using higher polluting cars. The CO2 Charge will also seek to influence vehicle purchasing choices in the future and encourage the market for lower CO2 emitting cars.

The Congestion Charge introduces a higher CO2 Charge of £25 that will apply to cars that emit over 225g of CO2 per kilometre. This includes those cars in Vehicle Excise Duty (VED) band G and equivalent and cars registered before March 2001 with engines over 3,000 cc in size. The majority of cars - VED bands C, D, E and those in F with emissions up to 225g CO2 per km, as well as those registered before March 2001 with engines up to and including 3,000 cc - will continue to pay the existing daily charge of £8.

Therefore, a similar Natural England scheme could be as follows:

Those vehicles that emit more than 225 g/km would have the threshold at which the payment per mile changes from 40p to the lower rate per mile reduced. The Congestion Charge rate for these vehicles is £25, whilst the standard rate remains at £8 (i.e. the standard rate is 32% of the higher rate). Applying the same proportion to the rates set out in the policy would see the thresholds decrease as follows:

'User'	Average maximum mileage per member of staff	Threshold mileage for moving from 40p to the lower rate per a mile for a car of 225 g/km or over
Low 1-500 miles	122	39
Medium 501-500 miles	819	262
High 5001+	7089	2268

Taxis

Taxis contributed 14 tonnes of carbon dioxide or less than 1% of travel footprint of the founding bodies in 2005-06. Taxis tend to be older vehicles with a larger engine size, and hence more polluting than other forms of car travel.

Air travel

Air travel is the most carbon-intensive transport mode used by Natural England staff. The carbon emissions from air travel are almost six times higher than those from rail travel over the same distance. Although air travel only contributes a small amount to the overall carbon emissions of the UK, the number of domestic flights are growing.

The 2005-06 baseline research shows that air travel contributes around 6% of total travel footprint and, although small, has the potential to grow significantly given the increase in domestic flights and their perceived convenience as an alternative means of transport.

The vast majority of Natural England offices are accessible within 7 hours by train. Introducing a maximum time of 7 hours on train journeys before air travel is considered means that only the most outlying of Natural England offices would be able to use domestic air travel as an option. For example, the quickest time from Truro to Newcastle is 7 hours and 59 minutes. Journeys, such as London to Edinburgh (4 hours 21 minutes) would not be included but London to Inverness would (8 hours 22 minutes).

Average times to Brussels through the Channel Tunnel are 2 hours 3 minutes, so travel from much of England to this location by eurostar would still be an outcome from this option. For the purposes of clarity this policy defines an international flight as a flight that does not take off and land in mainland England.

APPENDIX 2: Green Travel Policy Options Engagement Plan

Overview

This appendix sets out the staff engagement process on the green travel policy options.

The engagement process is critical because:

- consultation is a key element of ensuring staff buy-in and understanding of any new policy
- it is an easy way of disseminating the content of the policy widely across the organisation
- it complies with Natural England's Trades Union Partnership Agreement
- it gives staff timely foresight of expected changes in our ways of working
- it provokes the development of alternative policies that may be better suited to meeting our objectives
- it will identify our low carbon 'champions' within the organisation as well as stimulate innovative approaches to reducing individual travel footprints
- it will identify critical issues of equality, diversity, health and safety that may not have been envisaged through its assessment
- it is an opportunity to demonstrate the changes that the Executive Board and ELG will implement to reduce their own carbon footprints

The expected outcome from the consultation will be:

- a high rate of satisfaction from staff as they will feel they have been consulted and been able to have their say in the structure of the final policy
- awareness and buy-in of staff for low carbon ways of working on Natural England business
- a policy that is fit for purpose in meeting the 50% reduction target
- staff taking personal responsibility for their travel carbon footprint
- demonstrable leadership from the Executive Board, ELG and sustainability 'champions' across the organisation
- a policy that is ready for sign off by the Executive Board and Non-Executive Board

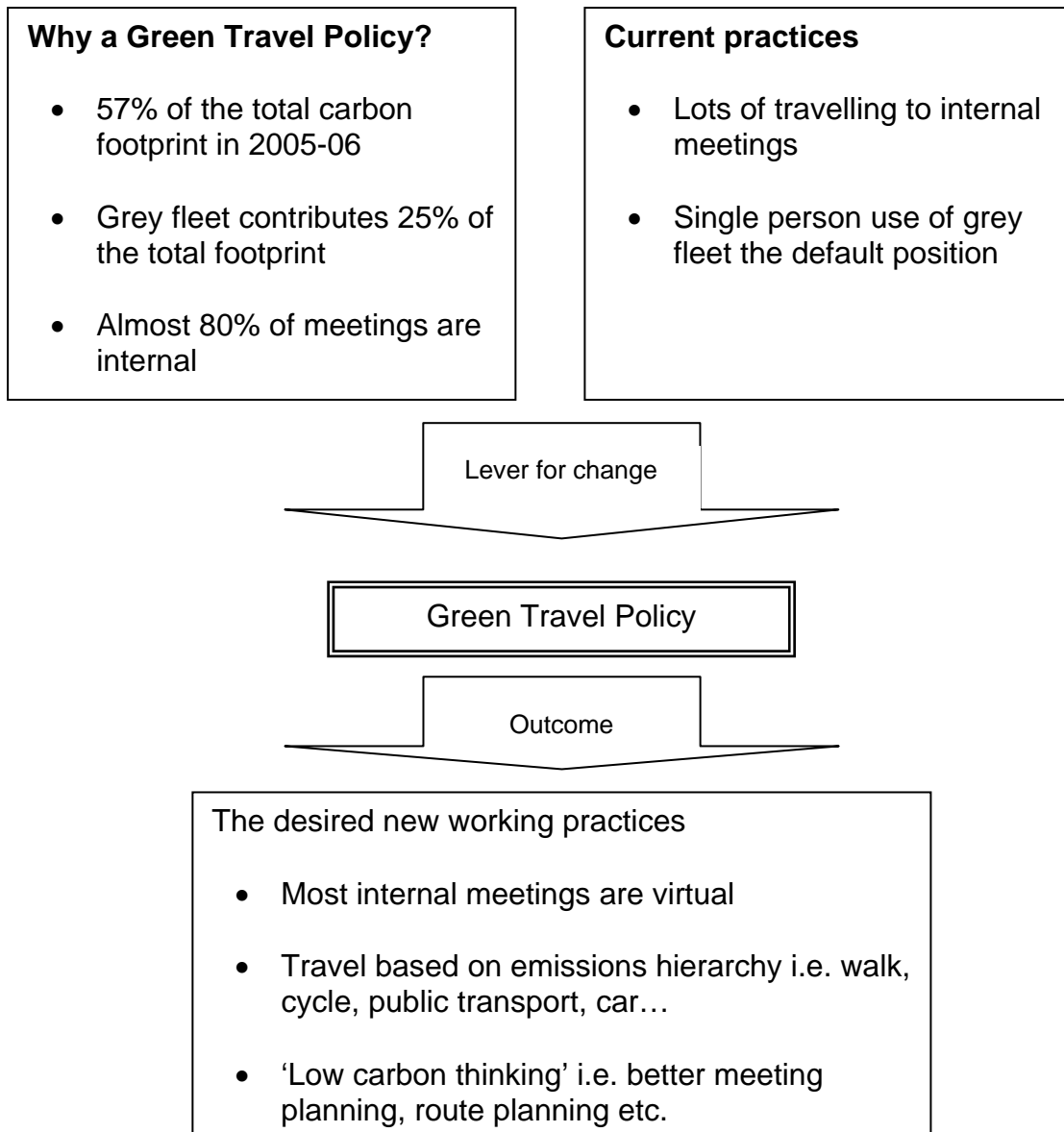
Timeline

The staff engagement programme will begin in early April and conclude in June 2008

The Engagement Plan

The message map

The map below sets out the core messages underpinning the staff engagement process on the green travel policy options.



Stakeholders

In addition to consulting with the organisation as a whole, six distinct groups from across Natural England and further afield have been identified as key to full engagement:

1. Executive Board
2. Executive Leadership Group/Heads of Teams
3. Principal Specialists
4. Team leaders, 'teamlets', area based teams and small national teams
5. Trade Union Side
6. Staff with mobility issues or those with special circumstances

Engagement with these groups is seen as critical for a number of reasons:

- they are groups that are most directly impacted by the proposed changes
- they have positive stories and messages that will have a high level of resonance to staff elsewhere in the organisation

- they are seen as leaders in both the development and implementation of the final policy
- they are seen as able to give ‘permission’ to staff for lower carbon ways of working through their own behaviours
- they have specific expertise in or are already working in a low carbon way
- they are considered as hard to reach

A range of specific events have been identified to engage with these groups which are integrated into the delivery plan below:

Phase 1: April 2008	Phase 2: May 2008	Phase 3: June 2008
<p>Consultation with all staff and the Non-Executive Board on the Policy Options to get views and ideas on each specific policy area.</p> <p>Media: Cascade Briefing, Quarter 4 Workshops, Focus Groups</p>	<p>Drafting of the Green Travel Policy in partnership with Natural England Trade Union Side</p>	<p>Consultation on the Green Travel Policy with all staff.</p> <p>Presentation of the final Policy to the 24 June Non-Executive Board.</p> <p>Media: Cascade, Intranet-based discussion event, road shows.</p>

Appendix 3: Equality Impact Assessment Initial Screening

The initial Equality Impact has been completed. The level of impact on each of the equality groups is presented below. Natural England will not implement any policies until the equality impacts have been addressed. We will do this in consultation with Natural England’s equality and diversity champions and ambassadors and the trade unions.

Equality Target Group	(a) Positive Impact		(b) Negative Impact		Reason/Comment
	High	Low	High	Low	
Men			X		As with all groups, the level and type of impact will, to a large extent, depend on role and personal circumstances, but we foresee both possible positive and negative impacts on males including areas such as impact to work life balance, health and financial consequences. Broader areas for review (which will impact all staff to a lesser or greater degree) include reimbursement options, the incentivising of teams and individuals and issues of personal safety.
Women			X		It is recognised that general perception is that there will be a higher level of risk and impact to women based on personal safety or levels of

				<p>vulnerability when walking / cycling / taking public transport. High impact is also anticipated regarding child/elder care responsibilities etc if journey times are lengthened or made more difficult via green travel options. This will need to be further assessed with increased consultation and careful analysis of current demographics etc.</p> <p>If reimbursement options are implemented, it follows there may be a negative financial impact to those who are less able to make use of personal allowances for green travel options. Noting the need for further evidence, this may more negatively impact women if they have additional considerations regarding caring responsibilities which constrain choice around public transport, or where considerations of personal safety mean green travel options are disregarded.</p>
Asian or Asian British people			X	<p>Further consultation will enable the needs of each specific ethnic group to be more fully understood. Generally, cultural considerations regarding aspects such as dress, custom and practice, preference for travel options will need to be gained via consultation and fully analysed to indicate areas of negative impact.</p> <p>Also, national and colleague demographics will need to be gathered and analysed to provide indications of issues such as staff feeling vulnerable when travelling in areas where there are different cultural densities.</p> <p>Future recruitment impact should also be considered regarding whether NE is seen as the employer of choice for potential ethnic colleagues; if organisational culture is seen as one where green travel options are the norm and if this is perceived to fit less well with cultural customs, then potential talent from an ethnic background may choose to seek employment elsewhere. Consultation with relevant groups will help to understand whether this is a consideration or not.</p>
Black or Black British people			X	
White people (including Irish people)			X	
Chinese people			X	
Mixed Race people			X	
Other racial/ethnic group (please specify)			X	
Disabled and Deaf people			X	

				<p>Policy preferences for walking / cycling / public transport will impact highly on those with mobility issues</p> <p>Option to incentivise teams via budget allocation / managers via reduction in carbon emissions may negatively impact upon teams which include a disabled staff member, or may increase feelings of exclusion or isolation for disabled staff themselves</p> <p>The ability to comply or not comply may increase the visibility of disability which may be against the personal preferences of staff who are affected by disability / impairment</p> <p>Due consideration also needs to be given to specific disabilities that the manner in which these specific groups might be disproportionately affected by any imposed travel policy. These include but are not restricted to: Visual impairments Audio impairments Dyslexia Anxiety/stress related impairments Mobility impairments</p> <p>The move towards video / tele-conferencing will in general provide positive impact relating to disability issues however it should be noted that considerations should be given to areas of visual and audio impairment to ensure that reasonable adjustments are made appropriately. These may include line management taking suitable attitudinal approaches to ensure inclusive culture is created.</p> <p>It is recognised that other issues may not have been captured here and therefore further and specific consultation with representative groups will help to ensure all areas of concern and consideration are captured. NE Membership of the EFD should also be maximised to seek expert support on these issues. Consultation should be conducted via channels and methods that will enable all staff to participate in ways that suit their communication and engagement needs</p> <p>It should also be noted that in general engagement levels for staff who declared a disability as part of the 2007 staff survey were lower than non-disabled staff. Care must therefore be taken to ensure that no further inadvertent disengagement occurs through the introduction of this policy, or any component parts</p>
Gay, Lesbian				Issues identified here relate mostly to those

and Bisexual people				<p>where staff may perceive themselves to feel more vulnerable if green travel options compel them to make alternative travel choices that would expose them to cultures that they had previously avoided</p> <p>Care should be taken in the communication of the policy review and final policy to position the expected standards of staff to create an inclusive and welcoming culture. This will mean line managers feeling confident to support staff and challenge as appropriate</p> <p>Further consultation will enable NE to ensure that all issues pertaining to GLBT communities have been taken into account and acted upon</p>
Transgender people				<p>Issues identified are as those for GLBT and where appropriate for women. Actions to address are therefore similar and should be finalised after consultation</p>
Older people (50+)			X	<p>Research indicates that people in the 45-55 age group are most likely to have care responsibilities, whether for child care, adult care or elder care. This group is therefore likely to be highly impacted by any imposed policy that would affect journey timescales</p> <p>Research also indicates that the prevalence of disability increases after the age of 45 years and therefore this group may become increasingly affected by the areas highlighted in 'disability' above</p> <p>The planned consultation process should ensure that all other issues are highlighted and considered</p>
Younger people (17-25) and children				<p>The duty of care issues may be higher for younger staff who have not needed to navigate around public transport previously when asked to travel on NE business. Similarly, they may be increased perceptions of vulnerability within this group if needing to travel out of hours or and personal safety. Analysis into prevalence of crime rates etc will help to inform this</p> <p>Further research may be needed into areas such as cycle insurance costs to ensure that no disproportionate impact will arise from this policy option</p> <p>If research indicates that younger workers are on lower salaries then any decision to incentivise via choice of car (re carbon emissions) may also disproportionately impact those who cannot financially commit to purchasing newer and more emission efficient vehicles</p>

				Demographic and salary data should therefore be gathered in conjunction with relevant staff feedback to ensure that all issues are uncovered and considered
Working Patterns (P/T or part year)			X	<p>As highlighted in other groups above, if the assumption is made that those working part time are likely to have an increased responsibility to caring for others, then a policy that increases journey times will negatively impact this group unless alternatives or offsetting adjustments are made</p> <p>Similarly, if journey times are longer then this will have a disproportionate impact on those whose working days are already shorter due to part time patterns</p> <p>Consultation should include reaching out to representative samples to ensure all feedback is gathered</p>
Faith groups (please specify)				<p>Considerations given to the ethnic groups as detailed above are likely to closely correlate to faith groups</p> <p>If journey times lengthen due to policy changes this may impact upon prayer obligations. Increased physical exercise during periods of fasting re religious observance (as required by walking or cycling) may negatively impact staff</p> <p>Consultation should again be rigorous to ensure all issues are captured</p> <p>Any policy which is not conducive to a variety of faiths feeling comfortable in practising their beliefs may negatively impact upon future recruitment. This will have a greater impact in areas where ethnic diversity is greatest and therefore local and national demographics can be gathered to inform evidence and subsequent actions</p>