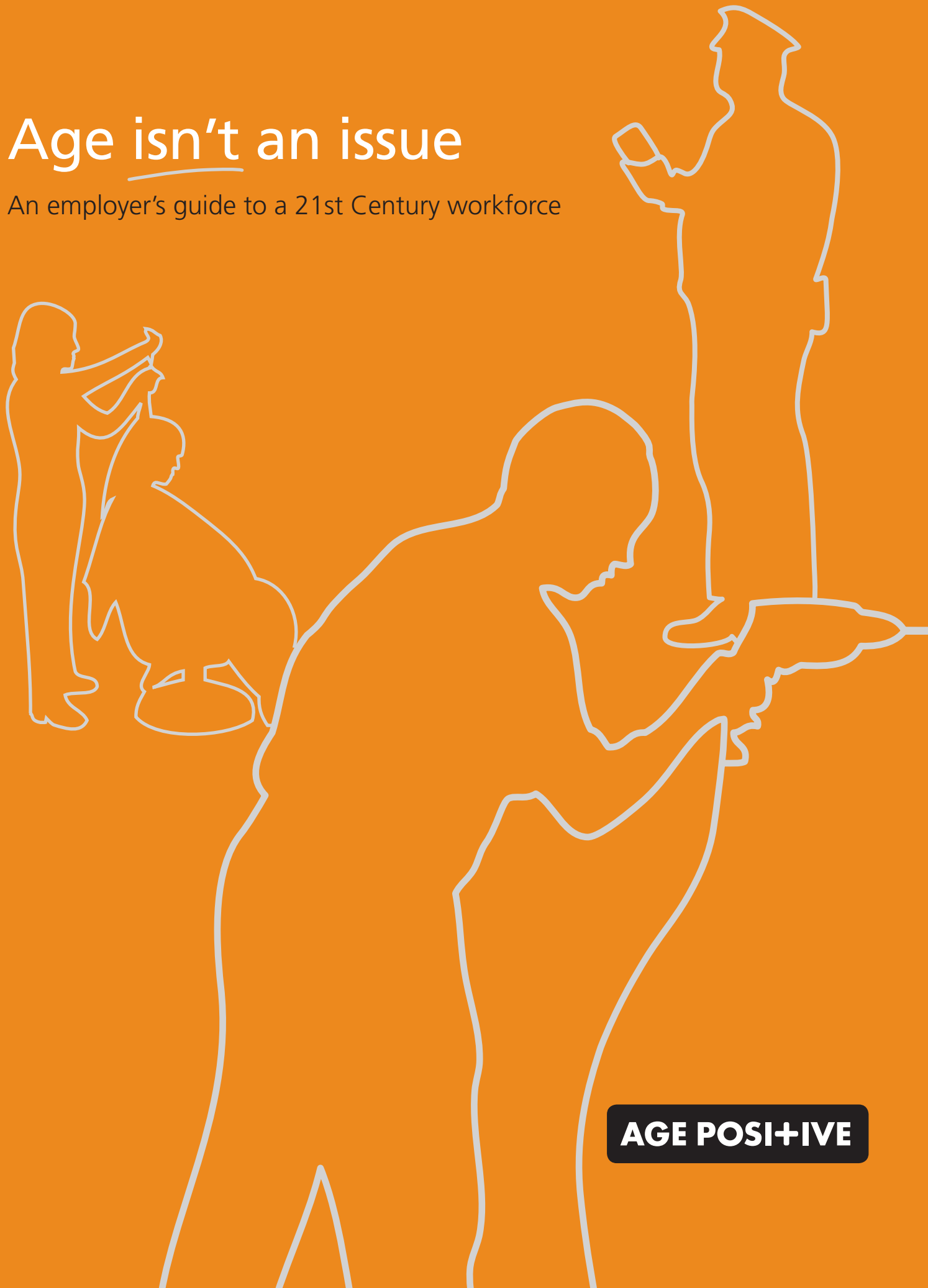


# Age isn't an issue

An employer's guide to a 21st Century workforce



**AGE POSITIVE**



# Age isn't an issue

An employer's guide to a 21st Century workforce



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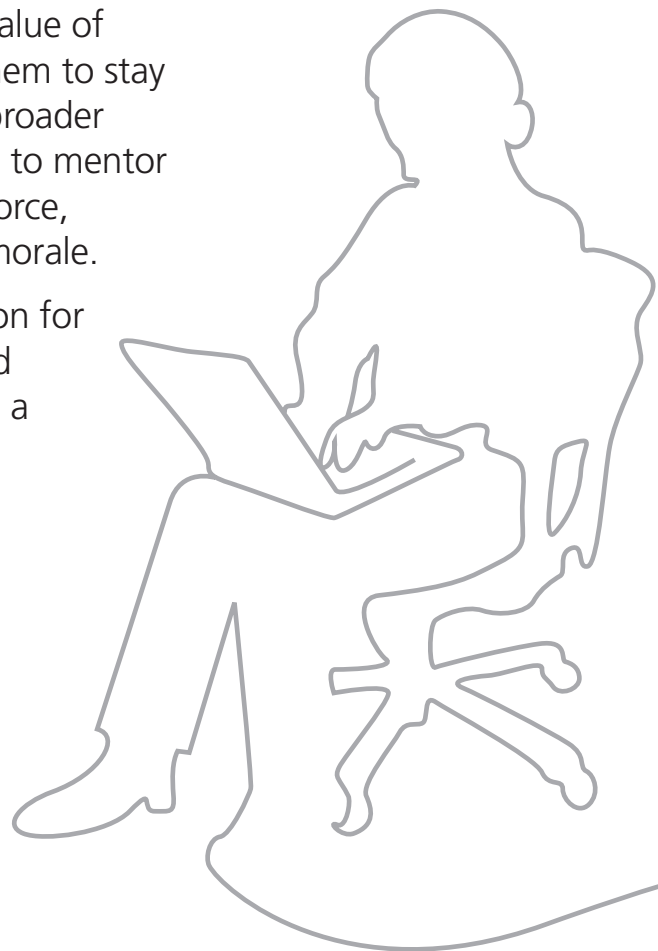
# Introduction

We are an ageing society and this is likely to have a dramatic impact on your workforce. By 2020, almost a third of the workforce will be over the age of 50. Now is the time to review workplace practices and decide what changes or improvements can be introduced.

An effective, motivated workforce is key to business success. With skills shortages and changing labour markets, it makes sense to encourage older workers to stay within the business. The Chartered Institute for Personnel and Development (CIPD) estimates that it costs an average of £3,600 to recruit each employee. Therefore, reviewing your recruitment and retention procedures could give you a competitive advantage and contribute to business success.

Employers are increasingly recognising the value of recruiting older workers and encouraging them to stay within the business. Benefits can include a broader range of skills and experience, opportunities to mentor new recruits, skills transfer across the workforce, reduced staff turnover, and improved staff morale.

This guide contains good practice information for businesses of all sizes – particularly small and medium sized employers who may not have a dedicated HR or personnel manager.



# Age legislation facts

- The Employment Equality (Age) Regulations 2006 cover workers of all ages and all employment and vocational training.
- The regulations include access to help and guidance, recruitment, promotion, development, redundancy, perks and pay.
- There is no official retirement age in the UK. Age regulations introduced a default retirement age of 65 but this is not mandatory. Employers do not need to set a retirement age at all.
- It is unlawful to discriminate against employees, job seekers and trainees on the grounds of age.

Employers need to be aware of their duties and check that policies, practices and routines are compliant with the age regulations. This guide contains information which you may find helpful in considering what you need to do.

## More information

Business Link provides guidance on 'Age equality at work'  
[www.businesslink.gov.uk](http://www.businesslink.gov.uk)

ACAS is nominated by government to provide advice to employers and individuals about the age regulations.

ACAS is the Advisory, Conciliation and Arbitration Service.

Telephone helpline 08457 47 47 47  
[www.acas.org.uk](http://www.acas.org.uk)

# Recruitment

Recruitment is expensive, both in terms of time and money, so it makes sense to get it right first time.

Despite recognising the value of older workers' experience and skills which may be transferable to the job, some employers and recruitment agencies still tend to automatically select younger people – whether or not they're the best person for the job. This may be a costly mistake as the Chartered Institute for Personnel and Development (CIPD) estimates it costs an average of £3,600 to recruit each employee.

## Broadening the search

It is important to make sure that applicants of all ages are included in the recruitment process and employers are increasingly looking outside traditional recruitment processes to attract a broader range of employees. To avoid age discrimination it is necessary to look carefully at the wording of job descriptions.

There are several recruitment methods that help attract age diverse applicants. Some newspapers and other media might only reach a limited age group. By using a wider range of publications you will reach a broader range of people and give opportunities to a wider age range.

It makes sense to spread the word and look at a number of recruitment methods.

These include:

- > local newspapers
- > community newsletters
- > Jobcentre Plus
- > Internet
- > recruitment agencies

Plus have you considered?

- > in-house advertising
- > staff referrals.

*"When you employ staff you get the benefit of their life experiences too. The more the years – the more the experience. We feature employees over 50 in our recruitment advertising to send out a positive message to prospective older applicants."*

## Recruitment agencies

To get the best out of your recruitment agency or advisers it is important to be clear about your commitment to creating an age diverse workforce.

Ensure that your agencies are up to date with your policies and practices and that they are complying with current legislation. Remember, if they discriminate, you may be liable.

## Job descriptions

It is important to spend time and effort in creating an accurate description of the job that will attract the right applicants. This should focus on the job and its requirements and must avoid any words or phrases that could suggest an age preference.

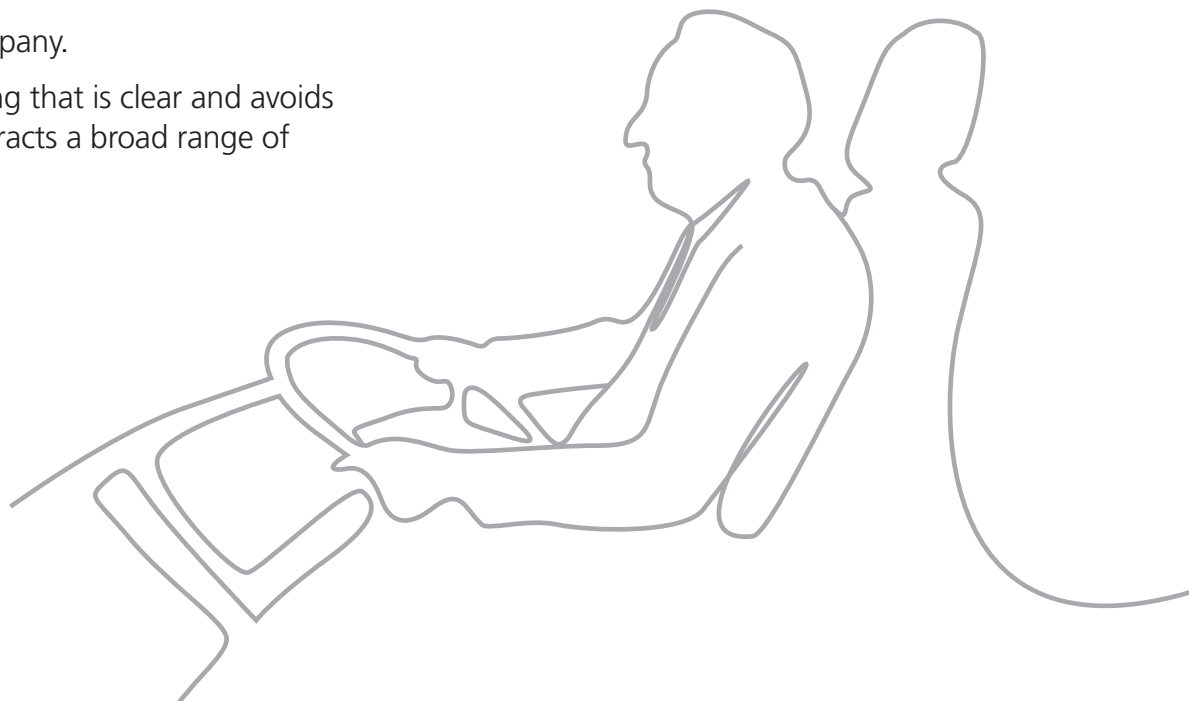
Some examples of descriptions that would suggest age include:

- > mature person
- > school leaver
- > first job
- > energetic graduate
- > young dynamic company.

Recruitment advertising that is clear and avoids age discrimination attracts a broad range of applicants and skills.

### Some suggestions for creating effective recruitment advertisements:

- > If asking for experience, describe what type of experience is required and to what standard. Avoid stating a number of years experience. Instead refer to the kind of experience needed to do the job.
- > Make sure that the qualifications you are asking for do not exclude people of different ages. Educational and vocational qualifications have changed and developed over time. Make it clear you will consider equivalent qualifications. Think whether the qualifications are really necessary or whether there are other ways of specifying the skill level you require.
- > Take professional advice if you are unsure about any aspect of your recruitment advertising or procedures – remember your business is responsible for complying with the legislation.



## Application forms

It is advisable to separate the applicant's personal details from the rest of the application form. This will ensure that those involved in the recruitment process are not influenced by age and judge on merit alone.

Consider whether a complete work history is relevant or necessary for the particular job.

Reassess application forms. Asking for a full work history may suggest a certain age bracket. Consider whether the questions you are asking are really relevant to the job.

Focus on skills – don't rely on qualifications unnecessarily.

## Interviews

Whatever your selection and interview process, it is important to make sure that staff are up to date with current requirements.

If possible, provide regular training and remind staff from time to time of their responsibilities regarding age discrimination.

Applicants will be aware of a positive attitude towards age if interviews are conducted by more than one person and are representative of different age groups.

### More information

Guide to recruitment on the Business Link website  
[www.businesslink.gov.uk/recruitment](http://www.businesslink.gov.uk/recruitment)

## Conducting an interview

There are a number of ways to set up an interview so that applicants of all ages will be given equal opportunity.

Have you:

- > Agreed on questions to be asked to all applicants before the interview and made sure that these relate to the job and not the person?
- > Made sure that the questions are fair to all candidates and relate to the person's ability to do the work and not whether they fit in with aspects of the business, for example, the age of people they might work with?
- > Considered giving applicants a telephone interview earlier in the process to reduce the possibility of age discrimination?

### Never use age or date of birth to influence the choice of applicants

Interviewers need to be aware that they are representing the business and reminded that personal comments that relate to age are not acceptable. Written notes should be taken during the interview which can be useful for feedback and provide evidence in the event of any accusation of age discrimination.

## Some exemptions to the age regulations

In practice, these are extremely rare but there are a limited number of occasions when it is legal to set an age limit:

- The job cannot legally be done by a person under a certain age (eg serving alcohol or handling dangerous machinery).
- There is a 'genuine occupational requirement'. In practice this is unusual apart from, for example, acting in certain roles in the theatre.
- The applicant is over, or within six months of the employer's retirement age provided this is 65 or over, or has been objectively justified if it is below 65. This means that the employer would have to show that the reason is necessary and is the right way to meet a genuine aim of the business.

### More information

ACAS is nominated by government to provide advice to employers and individuals about the age regulations

ACAS is the Advisory, Conciliation and Arbitration Service

08457 47 47 47

[www.acas.org.uk](http://www.acas.org.uk)

*"We changed our recruitment process to remove all personal details seen by interviewers, which helps us focus on the person rather than the age. This year 17% of new starters are 50 or over and there's been a reduction in staff turnover. 25% of employees have been with us for 25 years or more, which helps minimise new recruitment and training costs."*

Spokesperson, British Energy



# Employee benefits and pay

Employers should review their policies on benefits and pay and make sure that they reflect current legislation.

Any benefits for employees who have been with the company for less than five years are exempt under the age regulations. These may include bonuses, holiday entitlement or other benefits.

Age regulations allow pay and non pay benefits which recognise and reward loyalty and motivate staff, as long as this is within the five year limit. However, if this exceeds five years it is necessary for the employer to be able to show that the employee benefit is still related to loyalty or motivation.

When considering other benefits such as eligibility to join a pension scheme, all staff should be treated fairly and factors such as age and part-time working should not influence eligibility.

There should be clear and objective criteria relating to decisions on pay awards and other benefits. These should be based on ability and performance and the needs of the business and not on age, discrimination or subjectivity.

Staff need to know about benefits to take advantage of what an employer offers. By making sure that any benefits such as training opportunities and flexible working are known by all employees, both parties can benefit.

Employers should check that all employees are receiving benefits and pay that relate to their skills, level of experience and loyalty, and not to their age.



## More information

Guidance is available from Business Link on 'Expenses and benefits: the basics' [www.businesslink.gov.uk](http://www.businesslink.gov.uk)

# Training and development

To keep pace with change and new working practices, training can help employees of all ages to master the latest skills. This can help businesses fill the gaps and grow.

At any age, an investment in training shows real results including:

- > reduced absenteeism
- > fewer accidents at work
- > increased motivation and commitment
- > better performance.

## Encouraging commitment

Training opportunities encourage staff to stay with the company, saving businesses the cost of additional recruitment and potential disruption.

Staff are not always aware of the opportunities that are open to them or assume they are for younger workers. All employees should be made aware that training and development are available, without minimum or maximum age restrictions.

Employers may find it beneficial to meet staff on a regular basis to discuss development needs.

*"Older workers pass on vital skills and give practical support to new employees. This has helped us improve training by involving experienced workers in the company's apprenticeship scheme."*

Spokesperson, South Wales Forgemasters

## Government-funded training and more information

To keep pace with change and new working practices, training can help employees of all ages to master the latest skills. This can help businesses fill the gaps and grow.

Employers report that training is beneficial for all and there is no reduction in productivity and capacity with age in most jobs.

Rachel's Organic Dairy discovered that since they focused on developing all staff, absences have dropped, attendance patterns have become more stable and they have had a lower staff turnover.

### More information

The following organisations provide training advice and information.

Train to Gain

[www.traintogain.gov.uk](http://www.traintogain.gov.uk)

learndirect Scotland for Business

[www.lds4b.com](http://www.lds4b.com)

Welsh Assembly Government information for employers

[www.skillspeoplesuccess.com](http://www.skillspeoplesuccess.com)

## Promotion

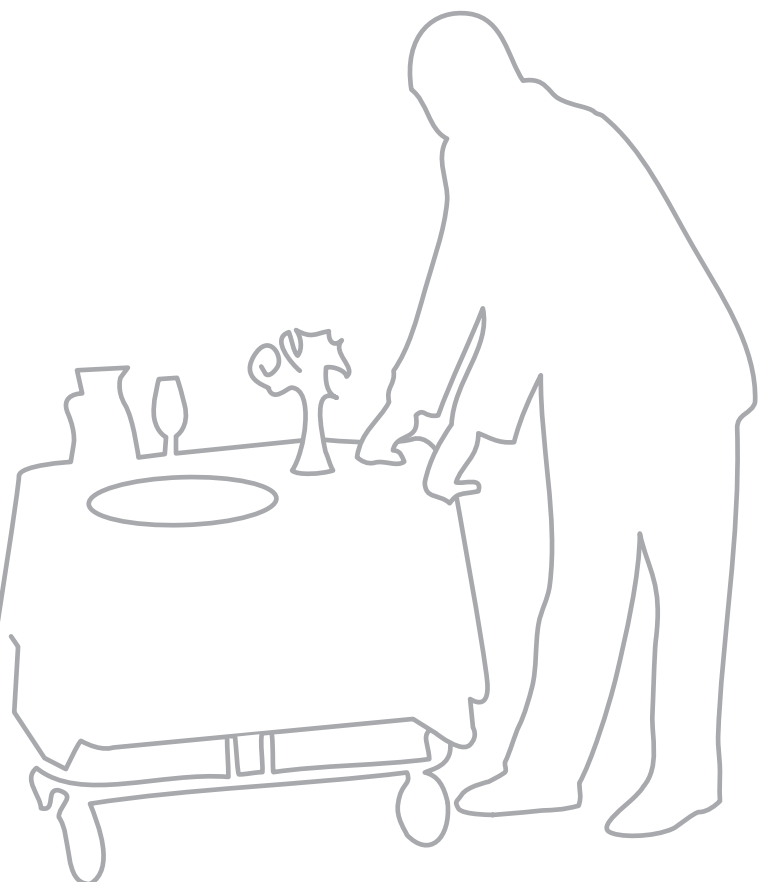
It is unlawful to rule out anyone for promotion on the grounds of age.

Decisions should be based on merit alone. Consider relevant and proven experience and avoid stating a number of years of experience.

## Are you investing in the future of your business?

To help encourage staff to invest in their future, employers can:

- Make sure that staff are aware that training and development is open to all ages.
- Encourage all employees, including new starters, part-timers and long-term staff to be aware of any training and development.
- Ensure that older staff, too, are given positive encouragement to update skills and take advantage of training opportunities.
- Promote staff involvement in mentoring – younger and older workers can support each other and share skills.
- Arrange talks or provide guidance to spread the word that training is for everyone.



# Flexible working

Flexible working has proven benefits for employers and employees alike, increasing commitment and helping retain staff.

Amongst people considering working instead of retiring, there is a strong preference for working part-time or on a flexible basis. Half of people who recently retired would have worked longer if they could have accessed flexible work<sup>1</sup>.

There are several ways to facilitate flexible working in all kinds of job and at all levels, and employers are increasingly looking at ways to accommodate the growing demand.

These include:

- > flexitime
- > shift work
- > job sharing
- > compressed hours
- > part-time or reduced hours
- > temporary contracts
- > seasonal work
- > term time only
- > home working
- > unpaid leave.

*"Flexible working options help people choose when they work. We offer a range that includes flexi-hours, reduced hours or other options. One example in nursing is the opportunity to take on a position with less responsibility such as moving from a position with a high workload to a more general nursing role."*

Spokesperson, Portsmouth City Primary Care NHS Trust

It is important that staff, managers and supervisors are made aware of what options are available. All staff should also be made aware of how decisions are made when requesting flexible working and what criteria are used to make those decisions. Bear in mind that some staff, including older workers, may not know how to go about asking about flexible working arrangements.

Employers should make sure that staff are aware of the benefits and opportunities that flexible working offers.

Have you:

- > Reviewed employment contracts to incorporate flexible options to allow working instead of retirement?
- > Informed employees of company policies related to retirement issues and ensured staff fully understand how these affect their pension entitlement?
- > Checked with staff to find out their ideas and preferences related to their retirement or plans to continue in employment?

Decisions must be made on individual and business needs, not on age or personal views.

Employees should be given clear guidance about working practices when moving to flexible working.

## More information

Guidance is available from Business Link on 'Pros and cons of employing part time workers'.

[www.businesslink.gov.uk](http://www.businesslink.gov.uk)

<sup>1</sup> McNair, 2006; CROW, 2004

## A flexible approach for a strong business

Many employers believe that flexible working makes good business sense and brings improvements:

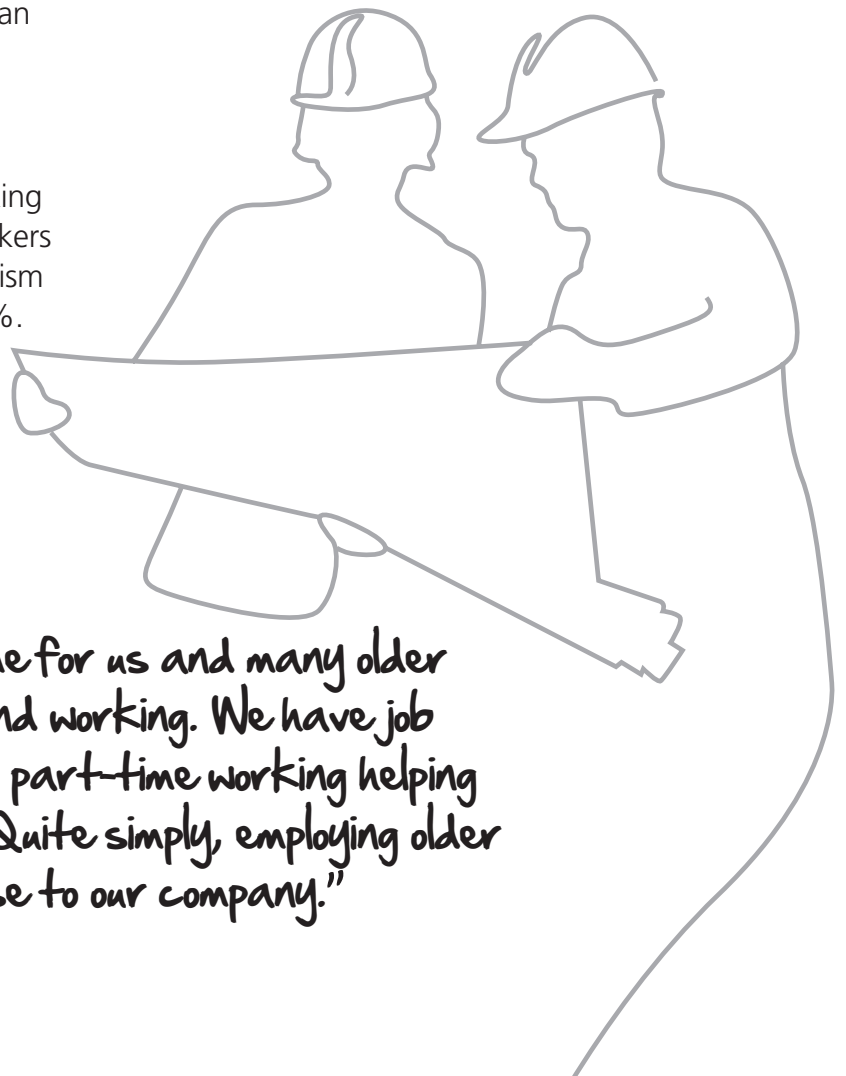
- Savings on overheads when employees work from home or less downtime for machinery when 24-hour shifts are worked.
- Extending the hours that customers have access to the business.
- A positive impact on retention and greater continuity as staff who might otherwise have left are offered hours they can manage.

Employees who are considering working differently as they approach retirement, or plan to continue working instead of retiring, may wish to discuss the various options with their personnel department or their manager.

At City Sightseeing in Glasgow, flexible working applies to all employees and many older workers carry on working for the company. Absenteeism is low and retention rates are around 90-95%.

### More information

Guidance from British Chambers of Commerce and CIPD - 'Flexible working: good business. How small firms are doing it' is available on [www.britishchambers.org.uk](http://www.britishchambers.org.uk)



*"Weekends are a very busy time for us and many older people are attracted to weekend working. We have job sharing, flexible retirement and part-time working helping us attract and retain staff. Quite simply, employing older people makes good business sense to our company."*

HR Director, Hunters Estate Agents

# Retirement

Employers cannot afford to lose key people, even more so during difficult times. Traditional retirement practices may lead to the loss of valuable skills and the expertise of older workers.

The challenge for employers is to attract and retain the best people for the business. The procedure your business has on retirement is one area that impacts directly on staff retention and can be critical to your bottom line.

By using flexible working options instead of imposing compulsory retirement, employers can reduce capacity without losing valuable workers and their expertise.

It is not a legal requirement for businesses to have a retirement age. When asked, only 30% of businesses with a fixed age retirement were able to give a reason – mainly it was purely historic.

Offering employees choices to work with flexible working options instead of retirement helps you to retain skilled and experienced workers.

Employers who choose to work with a fixed retirement age must follow strict compliance procedures. Compensation of up to 8 weeks pay may be awarded where non-compliance with legal procedures is proved at a tribunal, in addition to substantial legal fees.

There is also a myth about so-called 'job blocking'. Some employers assume there is a need to remove older workers to make way for younger workers.

However, other employers believe this approach is damaging to productivity as it fails to maximise skills and experience and increases staff turnover and costly recruitment and training.

*"We have removed the contractual retirement age altogether. It simply doesn't make sense to retire an employee because of their age. All that should matter is competency to do the job. Employees can continue in our pension scheme past 65, and draw on their pension while they work for the Group."*

Head of Diversity, Co-operative Group.

## Retirement without a set age

If there is no set retirement age, it is assumed that an employee will continue working and it is up to the employee to notify the employer of their wish to retire.

## Communication

Ensure clear and transparent communication to all employees and worksite representatives, to show it is a well thought out process that the organisation operates without a formal retirement age.

Your communication should promote the benefits of this policy, for example more choice for employees, more opportunities for the business to retain productive, experienced staff and the opportunity to reduce compliance procedures and costs.

## Managing employee expectations

Your employees will appreciate more choices in later years working. You should ensure they know that you support flexible approaches to work and retirement and want to encourage employee participation in discussions regarding their retirement options and eventual exit from the workplace.

The remainder of the workforce will be encouraged to see older workers being presented with a range of retirement options, something they will appreciate when considering their own retirement in years to come.

Make sure that the benefits are clearly apparent to all, the procedure is more likely to make sense and be better accepted when employees can see what it means for them.

*"We have no retirement age. There are no concerns about reduced progression opportunities and the process of training younger staff has been improved greatly by involving experienced, skilled, older workers as trainers on the company's apprenticeship scheme."*

Spokesperson, South Wales Forgemasters

## Performance reviews

Ensure that performance reviews, including where this is dealt with by informal discussion, are delivered in a meaningful way to employees, regardless of age.

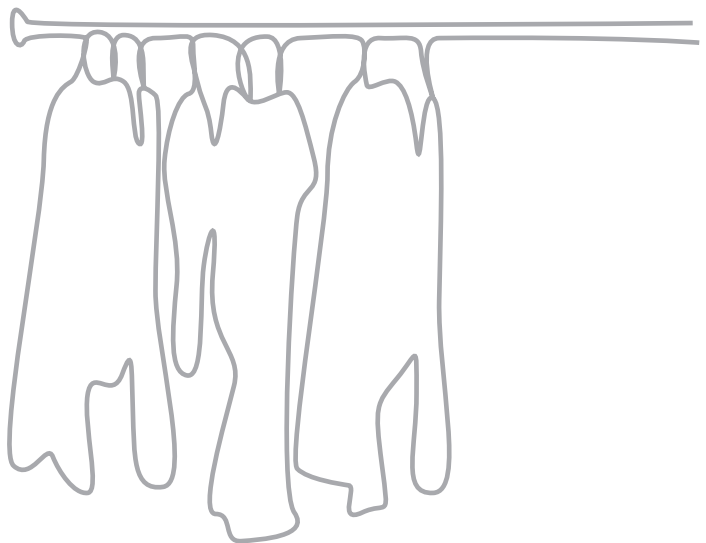
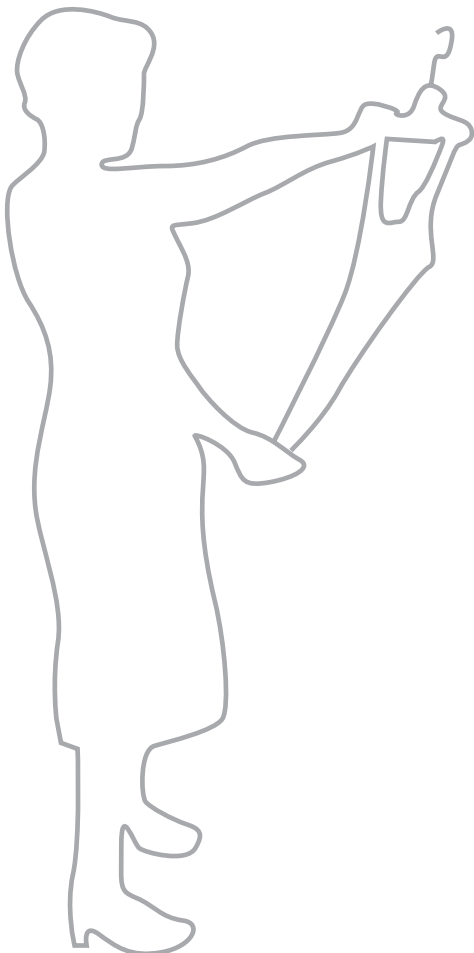
Use reviews to motivate and encourage improved performance by basing them on clarity of job roles and giving clear feedback on how the employee is doing now and expectations for the future.

For those not meeting required standards, offer guidance and help to improve performance through wider job options or a refreshed approach to duties or hours worked.

As an employer you should regularly undertake health risk assessments for all staff. Ensure that employees are fully aware of the benefits intended to come from these reviews.

Employers should:

- › Check whether the company retirement age should be raised or can be removed altogether.
- › Check their procedures and make sure that employees are aware that they can ask to work longer and employers must consider all requests.
- › Ensure all staff involved in managing retirement are aware of current regulations and of opportunities for keeping people on if they wish to work longer.
- › Make sure everyone in the organisation is aware of the requirement to treat everyone fairly regardless of age.



## Fair dismissal

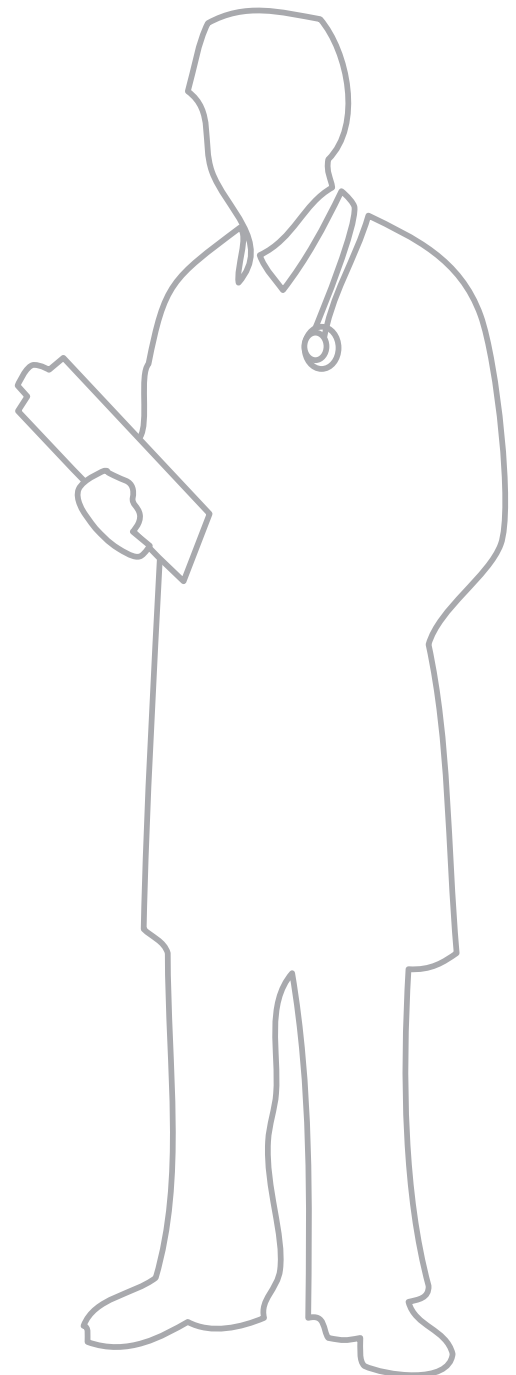
Where no retirement agreement exists and someone is dismissed for other reasons such as conduct, redundancy or capability, you must ensure that 'fair dismissal' procedures are applied – these are unaffected by someone's age. You should also ensure that those involved in administering this process are trained on how to do it.

### More information

Guidance on dismissal is available on the Business Link website  
[www.businesslink.gov.uk](http://www.businesslink.gov.uk)

## Pensions and insurance

An employee may wish to continue working past State Pension age or the organisation's occupational pension age, especially as it's possible for them to draw part of their occupational pension and continue working for the same employer. People can work whilst drawing their state pension or work and defer receipt of a higher state pension or a lump sum and their normal pension. State Pension deferral simply means putting off claiming your State Pension when you reach State Pension age, or choosing to stop claiming it after you have already claimed it. This allows you to build up extra income or a taxable lump-sum payment. Employers who retain older workers report that it need not involve extensive or expensive changes to existing pension and insurance arrangements.



## Retirement with a set age

Employers who choose to work with a fixed retirement age must follow strict compliance procedures. Where non-compliance with these legal procedures is proved at a tribunal, compensation of up to 8 weeks pay may be awarded in addition to substantial legal fees.

The law currently includes a default retirement age of 65 for employers who believe they need to set a retirement age. It means those employers can set a compulsory retirement age at 65 or above. The government plans to review the default retirement age in 2010. If the review finds that the default retirement age is no longer needed, it will be removed. This would make compulsory retirement ages generally unlawful.

Compulsory retirement below 65 is unlawful, except where an employer can objectively justify the earlier retirement age. The test of objective justification is not an easy one and it would be necessary for the employer to provide evidence. This means that the employer would have to show that the reason is necessary and is the right way to meet a genuine aim of the business.

Procedures apply if an employer decides to use a compulsory retirement age.

When an employer uses a compulsory retirement age (whether 65 or higher) they must write to employees not less than six months before the intended retirement date telling them of their right to request to work longer.

All employees have the right to request to work beyond a compulsory set retirement age and employers must consider all requests to work longer.

Employers may still refuse an employee to work past the compulsory retirement age (whether 65 or higher) as long as they have followed the correct procedures.

### More information

Guidance on compliance procedures when using a retirement age is available in the ACAS guide 'Age and the workplace' on the ACAS website [www.acas.org.uk](http://www.acas.org.uk)



# Redundancy

It is unlawful to make people redundant based on their age.

Redundancy is an unfortunate fact of life and businesses have to make hard decisions when they need to let people go. It makes sense to try and keep the staff who have skills and experience that may be hard to replace.

## Statutory payments

The law on statutory redundancy payments was changed by the Employment Equality (Age) Regulations 2006.

- > The upper and lower age limits were removed.
- > Workers under 18 and over 65 have the same rights to redundancy payment (after they have completed the minimum employment qualifying period).

Age and length of service are still taken into account when redundancy payments are calculated. Employers need to make sure that their calculating method complies with current requirements and that the way payments are worked out can be objectively justified.

Employers need to consider the value of each employee when they decide who to make redundant. They should consider the needs of the business, job requirements and the skills and capabilities of their staff.

## Last in, first out...

This approach does not credit the fact that the 'last in' may be a crucial addition to the workforce. This could also lead to age discrimination. It is recommended that employers make their choice objectively, based on staff skills and the needs of the business.

## Alternatives to redundancy

If a business needs to cut back, they could offer their staff alternative working arrangements such as:

- > job sharing
- > reduced hours
- > short-term contracts
- > career breaks.

Employers considering redundancies should make sure that all staff involved in the selection and decision-making process are aware that it is unlawful to make a decision based on age or other discriminatory grounds.

## Voluntary redundancy

If used, this must be offered to all staff, regardless of age. You may be surprised at who applies.

### More information

Guidance on Avoiding Redundancies is available on the Business Link website [www.businesslink.gov.uk](http://www.businesslink.gov.uk)

# Health and safety

By making sure that any physical requirements of the job are clearly specified during recruitment and interviewing, all applicants will be aware of what is needed and their suitability. Employers may introduce testing but this should be for all applicants, regardless of age.

Poor workplace design and inflexible working practices prevent staff from being fully effective, not age.

The facts:

- Employers increasingly recognise the benefits of employing older workers, including a commitment to working and high attendance rates.
- The health and fitness of older people is improving.
- Any loss in speed and agility is often compensated by an increase in accuracy and reliability.
- Older workers do not have more accidents than younger workers.
- Short-term absence is lower in older workers.

## Capability to work

Age is not an indication of capability and does not determine an employee's physical ability to do a job. Physical incapacity at any age is a legitimate reason to terminate an employment contract, but age cannot be used as a reason to determine an employee's fitness to do a job.

It is important to be objective; do not make an assumption of capability based on age. The demands of the job and the ability of the worker are the critical factors when deciding on suitability.

Employers can encourage older workers to apply for employment or continue working by:

- Accurately describing the physical requirements of the work in recruitment advertising and during interviews.
- Offering flexible working, for example reduced hours or a different role to employees who want to continue working.
- Retraining in order to retain older workers or adapting the workload to retain older workers requiring less strenuous work or less responsibility.
- Encouraging regular health checks for all staff.

Risk assessment must be related to the job, not to the age of the employee.

*"Older people tend to stay with us for longer and help us to provide a balanced framework for team working. Since focusing on developing all our staff, absences have dropped, attendance is more stable and we have a lower turnover of staff."*

## Risk assessment

A risk assessment is an important step in protecting your workers and your business, as well as complying with the law. In many instances, straightforward measures can readily control risks. For most, that means simple, cheap and effective measures to ensure your most valuable asset – your workforce – is protected.

Some simple measures can include:

- › Assessing whether heavy lifting is needed in a particular job or can be removed.
- › Adapting workstations to minimise repetitive movements.
- › Adjusting lighting, temperature and working conditions.

All staff benefit from improved working conditions and a commitment to health and safety.

### More information

Guidance is available in the HSE guide 'Five steps to risk assessment' on the HSE website [www.hse.gov.uk](http://www.hse.gov.uk)

*"We have found that older workers who receive job-related training reach the same skill standards as younger workers. A 69 year old team leader trained to operate a forklift taking a four day induction course and passing a practical and written exam – exactly the same as everyone else in the company."*

Spokesperson, Beacon Foods

# More information

## **Age Positive**

Good practice information, case studies and research on age issues.

[www.businesslink.gov.uk/agepositive](http://www.businesslink.gov.uk/agepositive)

## **ACAS**

ACAS is nominated by the government to provide advice to employers and individuals about the age regulations.

08457 47 47 47

[www.acas.org.uk](http://www.acas.org.uk)

## **Business Link**

Business Link is a free business advice and support service.

0845 600 9 006

[www.businesslink.gov.uk](http://www.businesslink.gov.uk)

## **Flexible working**

'Flexible working: good business.

How small firms are doing it' guidance from CIPD and British Chambers of Commerce (BCC).

[www.britishchambers.org.uk](http://www.britishchambers.org.uk)

## **Recruitment**

Recruitment guidance is available from Business Link.

[www.businesslink.gov.uk](http://www.businesslink.gov.uk)

## **Redundancy**

Avoiding redundancies guidance is available from Business Link.

[www.businesslink.gov.uk](http://www.businesslink.gov.uk)

## **Risk assessment**

'Five steps to risk assessment' is available from HSE.

[www.hse.gov.uk](http://www.hse.gov.uk)

## **Training**

Training advice and information is available from:  
Train to Gain

[www.traintogain.gov.uk](http://www.traintogain.gov.uk)

learnirect Scotland for Business

[www.lids4b.com](http://www.lids4b.com)

Welsh Assembly Government

[www.skillspeoplesuccess.com](http://www.skillspeoplesuccess.com)





## **AGE POSITIVE**

Working with employers to remove age discrimination in employment

**DWP** Department for Work and Pensions

This publication is online at  
[www.businesslink.gov.uk/agepositive](http://www.businesslink.gov.uk/agepositive)

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