

Call for evidence – Collective Redundancies – response form

You can complete your response online through Survey Monkey:

<https://www.surveymonkey.com/s/JCJW5G5>

Alternatively, you can email, post or fax this completed [response form](#) to the Department for Business, Innovation and Skills (BIS).

Email : collectiveredundancies@bis.gsi.gov.uk

Postal Address:

Richard Lowe
3rd floor Abbey 2
Department for Business, Innovation and Skills
1 Victoria Street
London SW1H 0ET

Fax: 0207 215 6414

The Department may, in accordance with the Code of Practice on Access to Government Information, make available, on public request, individual responses.

The closing date for this consultation is: **31 January 2012**

Name:

The Law Society of England and Wales

Address:

The Law Society's Hall
113 Chancery Lane
London WC2A 1PL

The Law Society is the representative body for more than 140,000 solicitors in England and Wales ('the Society'). The Society negotiates on behalf of the profession, and lobbies regulators, government and others.

This response has been prepared by the Society's Employment Law Committee ('the Committee'). The Committee is made up of specialist employment lawyers from across England and Wales. Committee members provide advice and representation to employers and employees through practice in City and regional firms, local government, industry, trade unions and law centres. Some Committee members are fee-paid employment judges.

x	Business representative organisation/trade body
	Central government
	Charity or social enterprise
	Individual
	Large business (over 250 staff)
	Legal representative
	Local government
	Medium business (50 to 250 staff)
	Micro business (up to 9 staff)
	Small business (10 to 49 staff)
	Trade union or staff association
	Other (please describe):

Introduction

At the outset, the Law Society would like to make a number of preliminary points.

First, we want to highlight the purpose behind the legislation. The parent directive states at Article 2(2) that the purpose of consultation is to explore ways and means of avoiding the redundancies, the numbers affected and of mitigating any consequences. Any changes to the consultation regime should not frustrate the underlying objective of the legislation.

Second, there are a number of areas of uncertainty in the existing law that are not addressed by the call for evidence. Most notably, it is difficult to be certain when the threshold of 100 potentially redundant employees is reached, thus triggering the duty to consult. A particularly difficult area for practitioners is determining the extent to which previous rounds of dismissals should be taken into account. Greater clarity would be of assistance to employers and employees alike.

Finally, the document is couched in terms of the use of s.188 to carry out mass dismissals only. There is no reference to the widespread use of '90 day notices' to effect changes to terms and conditions. It is our members' experience that s.188 is at least as likely to be invoked in cases of changes to terms and conditions as it is to instances of mass dismissals. The call for evidence and subsequent proposals should also address these circumstances, to build a complete picture of the way in which the law currently operates.

The use of 90 day notices to usher in changes to pay and other conditions of employment can act to the detriment of the employee with the effective imposition of inferior terms and conditions through dismissal and re-engagement. Of course, in many circumstances, the 90 day period can be used constructively to help restructure businesses that are in financial difficulty. A 90 day period allows for meaningful engagement with the workforce and representatives. Arguably, realistic alternatives to redundancy could not be considered in a shorter period. Similarly, a 90 day period gives workers who may face cuts in their pay time to adjust their financial arrangements, for example by speaking to their mortgage lender.

The danger of a reduction in minimum periods is that this will place undue pressure on all those involved, with a detrimental impact upon workplace relations. It is highly likely that any reduction in minimum periods would increase the strain placed on employees and their families facing having to adjust quickly to a cut in income or the loss of a job, circumstances which might last for some considerable time.

Call for evidence: Collective Redundancies

Because of its role as representative body, the Law Society has not answered the first six questions in this consultation.

Q 1. How many consultations has your organisation undertaken in the last five years (since November 2006) on collective redundancies where: a) 100 or more redundancies were proposed within a 90 day period? Or b) between 20 and 99 redundancies were proposed within a 90 day period?

--

Q 2. Of the consultations that you reported in Question 1 please indicate the duration of each according to: Number of Consultations (100+ dismissals)

0-15	
16-30	
31-45	
46-60	
61-75	
76-90	
90+	

Q 3. Of the consultations that you reported in Question 1 please indicate the duration of each according to: Number of Consultations (20-99)

0-15	
16-30	
31-45	
46-60	
61-75	

76-90	
90+	

Q 4. If any consultations took more than 90 days to complete, please say how many days these consultations lasted for.

Q 5. Over the last five years, how many employees have been made redundant from your organisation, as part of a 100+ collective redundancy exercise?

Q 6. Are you aware of your rights and obligations under sections 188-198 of the Trade Union and Labour Relations (Consolidation) Act 1992?

Yes [☐] No [☐]

Q 7. With whom do you consult about collective redundancies? What are the advantages and disadvantages of the engaging with different types of representative?

Our members' employer clients engage with employee representatives across all three groups set out in the underlying legislation: trade union representatives where relevant or, if none are recognised, either pre-existing staff bodies or employee representatives elected for the purposes of consultation.

An advantage of consulting trade union representatives is that they often have greater experience of engaging with employers in redundancy consultations, and will have access to legal advice and support.

From the employees' perspective, that experience and understanding allows them to robustly champion the employees' position on ways to avoid or reduce the number of any proposed redundancies. Trade union representatives will also have a more extensive view of industry norms, for example in terms of the amount of compensation offered to mitigate the

consequences of a redundancy.

The downside to union consultation is the sometimes variable experience of the representatives (which typically depends on their experience) and a tendency to insist on carrying out consultation for the entire mandated period (either 30 or 90 days) even when further consultation may make little practical sense. Whilst understandable from the perspective of the employees they represent (in that it maximises their period of paid employment) it can be frustrating from the employer's point of view when there are no substantive issues left on which to consult or if there is no realistic prospect of reaching agreement.

Employee representatives under the second limb of the legislation (typically works councils or staff forums) tend to be less common in practice. Where consultation is undertaken with this group, our members' experience suggests that they are comfortable in discussing options with the employer's management team because of their pre-existing relationships. However, they tend to lack the experience of consultation that trade union officials typically have.

Employee representatives who are specifically elected for the task of consulting under the statute are more common. In terms of advantages, those who nominate themselves for election tend to be well motivated and engage in the consultation willingly.

The disadvantages of such representatives is their comparative lack of experience, which can lead to an inability to identify the relevant issues and engage with employers accordingly.

For that reason, it can also be the case that employee rights are less well protected compared to consultation with trade union representatives. Some elected representatives are unsure as to the extent to which they alone can make decisions as part of consultation or if they are required to seek the consent or approval of the wider workforce to agreements reached in consultation with the employer. This is not necessarily helpful to either the employer or the employees, and the position is not clear from the existing legislation. There is also a lack of clarity on whether they need to discuss the outcome of consultation meetings with the wider employee base or if they have authority to reach agreement with the employer directly. Again, this is not clear from the legislation.

Some employers provide training for employee representatives before commencing consultation to familiarise them with their role and what it involves.

Q 8. What factors: a) make agreement difficult? b) make agreement more likely?

The factors will tend to be the same for (a) and (b) but in reverse:

- The steps taken prior to the redundancy exercise will be relevant. For example, in recent years many businesses, with good co-operation from their employees and unions, have tried to avoid redundancies with various 'recession-based' employee relations tactics, including wage restraint, variation of terms, an employees' choice of a menu of cost saving options. Notwithstanding these types of changes it may be apparent that redundancy is the only remaining survival step, which would shorten the need for discussion about possible alternatives;
- Whether the current culture is one of co-operation or confrontation, and willingness to change;
- The broader context for the employer will be the other business issues. Whereas for the employees they will have regard to other employee relations issues. This may include a broader union agenda within the business both from a sectoral or national perspective;
- For larger businesses, the possible involvement of a European Works Council, if the issues are transnational;
- The quality of the representatives. Union representatives tend to be more experienced and better informed and organised. Elected representatives may know the business better but have less experience of consultation, and may be less comfortable discussing the dismissal of their colleagues (or even themselves). Appropriate training could help with these issues;
- The quality of the information provided by management to the representatives;
- The quality of the process (see below);
- Corporate structures. The restructuring might be happening in a subsidiary, under instruction from a parent company that might be foreign owned. In the latter case this can sometimes mean that the company is less familiar with and does not properly build collective consultation into the process; and
- When there is an urgent financial need for change, speed will be an important consideration for an employer, which will make their negotiation stance much less receptive. This will in turn create greater risks for the employees and impact negatively on the overall

process and potential outcomes.

Q 9. If agreement cannot be reached, when can an employer be confident that the consultation is finished and that redundancy notices can be issued?

Our members' experience is that employers and employees (and their representatives) would benefit from greater clarity about the issues that arise on the correct timings in a collective redundancy exercise and the options to shorten the timetable. The issues include:

- What triggers the start of the period? The minimum periods are exactly that and consultation should start earlier if, in general, a firm decision has been made to dismiss for redundancy. There have been conflicting cases in EU and UK law over whether that is when dismissals are 'contemplated' (the Collective Redundancies Directive) or 'proposed' (s188 TULR(C)A). Sensible business planning could create unforeseen consequences of a requirement to begin consultation a long way in advance of any actual reorganisation, or a risk of legal challenge if it is not started.
- The fact that consultation must commence by a specified date does not mean that consultation meetings need to continue throughout the whole period.
- If everything has been agreed, or if discussions have been taken as far as possible, it is permissible to conclude the process. This should preferably be done with the consent of the employee representatives and the way should be left open for further meetings to be convened should any further issues arise.
- Employers should not be tempted to conclude the consultation process prematurely, otherwise they will leave themselves open to a claim for a protective award on the basis that the process has not been conducted in good faith.
- If the employer has genuinely concluded the consultation process, it can proceed to declare employees potentially redundant, conduct individual consultation with a view to trying to avoid dismissal and even issue notices of dismissal¹, all during the 30 / 90 day period. However, the actual date of dismissal cannot be within the 30 / 90 day period.

¹ *Junk v Kuhnel* [2005] IRLR 310

- The timetable and options to shorten it could be clarified.

Q 10. What happens during consultation?

Our members' experience suggests that well-managed exercises which provide good quality information to employees result in a better process for all concerned. However, guidance on best practice would be valuable, because practice varies considerably, depending on the business culture, the quality of internal relationships and the relevant experience of both the representatives and the employer's management.

A statutory redundancy consultation exercise should start with the notice to the employee representatives in the form required by s188 TULR(C)A, about ways to avoid the dismissals, reducing the number of people to be dismissed and negotiating the consequences of the dismissals, with a view to reaching agreement on these issues. Guidance on the form that an agreed process should take would be advantageous, for example, a timetable of meetings, a model agenda, FAQs, responses and feedback. This approach helps to address the relevant issues, making it easier to identify whether or when, consultation has effectively ended, even if before the 30/90 days have passed.

Q 11. What impact does consultation have on the employer's business decision? (e.g. in terms of number of proposed redundancies actually effected?)

In our members' experience, a well-managed process can have an impact on the number of employees dismissed and who is dismissed in terms of a selection process, individual preferences, and volunteers. It can also affect the timetable and redundancy packages, including, in situations of closure, who goes when and who is retained, as well as what the overall termination packages are going to be.

Q 12. Have you experienced specific difficulties when trying to determine what constitutes an establishment for the purposes of collective redundancy consultation? If yes, please describe them

Yes [] No []

If yes please describe

Most employers take the position that the establishment is the geographic

base where employees perform their duties. In most cases this does not give rise to any issues. However, in the following cases, defining the nature of a particular establishment can prove more problematic:

- Mobile workforce (for example travelling sales forces or airline flight staff);
- An employer carrying on business from a number of sites, which whilst geographically close are nonetheless distinct;
- Two or more employers in the same group carrying on business at the same site or (per above) group of sites;
- Employers who organise their business along regional management lines (e.g., a South East or Midlands sales force) where the organisational procedures suggest a wider establishment than one dictated purely by geographic considerations; and
- Employees who work exclusively from home.

The difficulties employers face in this situation are compounded by the comparative lack of guidance from the courts and the underlying legislation.

Q 13. BIS is aware that there are some issues around the interaction of fixed term contracts with collective redundancy consultation law. What problems do fixed term contracts create? What do you consider to be a potential solution?

It is unclear why this question (regarding any particular issues around fixed term contracts) has been included in the section of the paper dealing with the definition of 'establishment'. There is no obvious link with the desire to address uncertainty around that definition.

We assume that BIS's concern is that lengthy consultation periods might mean:

- employers having artificially to extend fixed term contracts, to first complete the required consultation;
- that this may be particularly difficult for employers in certain sectors, such as, education, where the rationale for the fixed term is a direct link with external funding, for example research grants.

Having said that, to give those on fixed term contracts less protection in this respect than permanent comparators, would on the face of it be contrary to the Fixed Term Employee Regulations (Prevention of Less Favourable Treatment) Regulations 2002, and would need to be justified.

Q 14. What factors do you consider could determine what constitutes an 'establishment'?

The key to determining what constitutes an establishment is the question of where employees perform their work. In other words there is a strong presumption in favour of a 'geographic' test when determining the establishment.

In more difficult cases, including those outlined above in the response to question 13, employers will often consider the question in terms of which geographical establishment can the employee best be said to be assigned to perform their duties. Factors that employers will use to answer this question in more difficult cases include:

- management reporting lines;
- the percentage of time an employee spends at a particular site;
- the degree of organisational integration between sites (especially important where the employer operates from a number of linked but geographically separate sites); and
- the provisions of an employee's contract of employment, and in particular the terms dealing with mobility, home working or nominated 'base office'.

However, these must be recognised as being only approximate measures. The lack of clear case law or guidance in the statute on this question makes the task of identifying establishments in more difficult cases problematic.

Q 15. What are the advantages or disadvantages of the current 90 day minimum consultation period work, in your experience (a) for employers (b) for employees? In particular, what is the relevance of employees' statutory or contractual notice periods?

One advantage for employers is that the 90 day consultation period allows meaningful discussions to take place with employee representatives to consider alternatives to redundancy. Collective redundancies undoubtedly affect business operation and strategy and so this period allows greater time for employers to consider alternatives to permanent job losses. It is not uncommon for employees to suggest, for example, working fewer hours or taking a temporary pay cut in order to avoid redundancies.

The corollary is that the uncertainty created during a longer period of consultation is disruptive to business at a time when, in some cases, the future of the business may be in question. This could lead to businesses losing any competitive advantage they may have.

Lawful and meaningful consultation means that employers must give serious consideration to any proposals suggested by employees. The 90 day period allows time for such consideration to take place. Failure to engage in meaningful consultation is unlawful, while appearing to pay lip-service to consultation requirements is damaging to workplace relations at a time when businesses are acutely reliant on staff support.

Accordingly, shortening the 90 day period or otherwise not allowing for adequate consultation in the timetable could be a false economy. For employees, the 90 day period allows them time to engage meaningfully in suggesting ways that redundancies may be avoided. For employee representatives, the 90 day period provides a sufficient decent period to consider the information provided by the employer, address this with members/staff and to make suggestions about the procedure to be followed, the criteria for selection and so on.

Where alternatives to redundancy do not appear viable, the 90 day consultation period allows employees to begin planning for the possible loss of employment.

With regards to notice periods, the period of consultation must have concluded or agreement been reached before notices of dismissal are issued.

Q 16. What are the costs to business of the 90 day minimum time period over and above a 30 day period? What generates these costs?

The main cost to business is the payment of salary and benefits to employees for an extra 60 days. Other, less quantifiable costs, may arise due to the dislocation and disruption caused while collective consultation is ongoing.

Q 17. If there were a statutory provision for employers and employee representatives to shorten the 90 day minimum time period by voluntary agreement, would this be used?

ECJ jurisprudence (*Junk*) has already suggested that where collective consultation has been exhausted, notices of dismissal may be issued before the full 90 days have expired. While there are obvious risks of issuing notices in anything but the most clear cases of agreement having been reached or consultation having been entirely exhausted, the Law Society believes that this is sufficient.

Concerns about the length of the consultation process often centre on anxieties from the staff and from employers about the risk of confidential information being disclosed. If there were to be any reduction in the 90 day minimum consultation period sufficient safeguards would need to be put in place to ensure that cutting short the consultation period is only used in exceptional circumstances and with the clear agreement of both parties.

Q 18. What would be the advantages or disadvantages of being able to shorten the period in this way?

The main advantage to employers would be to reduce uncertainty within the business and to reduce salary costs where collective consultation is unlikely to lead to any viable alternatives being suggested.

The disadvantage is that serious alternatives to redundancy are likely to be missed if consultation with employee representatives is shortened considerably.

Industrial relations are likely to be damaged beyond the period of the consultation if employees sense that the employer is simply 'going through the motions'.

For employees, the main advantage would be that it would remove the stress of not knowing about one's future. This advantage should not, however, be overstated particularly where the likely outcome is unemployment.

The disadvantages are that employees lose the ability to control and prepare for their future if consultation is shortened too much and that their invaluable operational experience is quickly lost. This is a significant issue not just for the continued viability of the business after redundancies have taken place but also during the consultation period where meaningful consultation should be open to serious suggestions about how redundancies could be avoided.

Q 19. What would be the advantages or disadvantages (a) for the employer and (b) for the employee of reducing the minimum time periods when 100 or more redundancies are proposed to 60, 45 or 30 days?

There may be economic advantages for the employer in being able to expedite the process, but there is a risk of increased pressure on all those involved, with potential damage to workplace relations and anecdotal evidence of resulting adverse health implications for the workforce. The greater the reduction in the time period the greater the risks are likely to be. Any possible economic advantage to the employer must be balanced against the impact on the workforce.

A possible advantage for the employee is that the whole process is concluded more swiftly, bringing certainty as opposed to the stress and insecurity of the unknown. This 'advantage' is in most cases however, outweighed by the numerous disadvantages inevitably consequent upon a reduction, the more so the greater this reduction is.

Such disadvantages include the stress and possible health consequences of the inevitable pressure brought to bear on the employee by a reduced time period. Such pressure might also facilitate the effective imposition of inferior terms and conditions through dismissal and re-engagement.

Other disadvantages include:

- The negative effect on income and on workplace relations;
- The reduction of time in which to find alternative employment within the same company or externally and a likely greater period of time claiming benefits;
- A dilution or complete extinction of the employees' influence on the redundancy process with a corresponding effect on the feasibility and/or implementation of alternatives to redundancy; and
- Possible lowering in performance levels.

A reduction in insolvency cases would reduce opportunities for TUPE transfer to potential buyers.

Q 20. How critical is the length of the statutory minimum time periods in instances of high-impact redundancies? Why?

The consultation paper defines 'high impact redundancies' as cases where the impact of redundancies is likely to be severe, either because of the large number of redundancies being proposed, or because of a limited supply of alternative job opportunities. It recognises that in such cases, longer consultation periods will generally be beneficial - both in terms of giving

maximum time to explore all reasonable ways of minimising the numbers of redundancies, and in providing opportunity for those leaving to find alternative employment (saving the cost of unemployment benefits). Consultation periods could perhaps be shortened in circumstances where, irrespective of being an instance of 'high impact', the redundancies are inevitable (e.g., because of impending insolvency). However, to effectively bring forward terminations in such circumstances would reduce opportunities for TUPE transfers to any potential buyer. In addition, there would be less time for the DWP to be brought in to assist employees in sorting out entitlement to any post redundancy state benefits. Also concerns about lack of flexibility around consultation periods, might be sufficiently addressed by the proposed guidance (paragraph 1.10 of the Paper) to help employers and representatives better understand when consultation is 'complete', so that individual notices can then be given.

Q 21. What would be the advantages or disadvantages of increasing the threshold for the number of redundancies proposed for the 90 day notification period (i.e. increasing it to a number above 100 redundancies)? What should the threshold be?

The greater the number of redundancies, the greater the impact both in terms of individuals and the wider community. Any possible economic advantage to the employer would be outweighed by the disadvantages outlined in response to question 19 above, which would be consequentially extended to a greater number of employees.

Q 22. What would be the advantages or disadvantages of a graduated threshold with different time periods applying for different numbers of redundancies?

In theory this might have advantages for both employers and employees and on the face of it may appear to be, or may indeed be, fairer. Any change could only be implemented, however, following extensive research, consultation and consideration. In practice this would still be somewhat arbitrary and impossible to tailor to individual businesses so as to account for variations in different sectors and regions. Such a structure might also introduce unnecessary and cumbersome complications.

Subject to the risk of complication outlined above, a graduated approach may have clear benefits for the employer in that the consultation process could be calibrated to the number of staff affected.

Q 23. The Government is also calling for evidence on the Transfer of Undertakings (Protection of Employment) Regulations. Please identify any issues that you have in terms of how the TUPE Regulations and the rules on collective redundancy consultation fit together.

The first thing to recognise is that the information and consultation processes for collective redundancy and TUPE operate for different purposes and in different ways. In a nutshell, redundancy is about avoiding dismissals and negotiating their impact. TUPE is about managing the impact 'measures' of an event, the transfer, which is going to happen to the employees, in any event.

Our members report frequent experience of these situations arising at the same time where there is a planned redundancy exercise as part of a business sale or, more often, outsourcing, planned to happen before, on or after the transfer. In any of those situations, the redundancy exercise would be a 'measure' about which the transferor would need to consult with its employees prior to the transfer, even if it did not yet know everything about

the proposed redundancy exercise.

The parties to the transaction would often want to do both consultations at the same time, therefore before the transfer, to minimise disruption to both business and employees.

The problem is most acute when the redundancy exercise happens on or after the transfer, which is more common in outsourcing transactions where, for instance, the place of operation changes with a new provider.

One of the most frequent concerns expressed by businesses in these circumstances is the complexity and legal risk arising out of this fairly common scenario. This is a wide topic but this is the key focal point. Before the transfer, the transferor must inform and consult about the 'measure' of the proposed redundancy exercise as part of its TUPE obligations. It can not consult about the proposed redundancies themselves because it will not be declaring the employees redundant. The transferee cannot inform and consult at that point about the redundancies which it will carry out when it takes over because before then, it does not employ the affected employees. No amount of cross-indemnities in the transfer documents, even assuming that, commercially, they are possible, will bind the employees and their representatives. Therefore, even an apparent joint consultation exercise carried out by both parties before the transfer will not satisfy the technical requirement for the redundancy consultation and, therefore, will not remove the risk that the transferee would be vulnerable to a claim for a protective award if it did not start its own consultation process after the transfer.

In effect, parties often tend to create a 'fiction' of joint information and consultation. Generally, if all goes well and if there is a co-operative process between all parties and the employees feel that they have been treated fairly and reasonably, the chances are that the technical points will not be taken. However, the parties to the transaction, particularly the transferee in the scenario described, simply cannot protect itself against the risk of a claim for a protective award, save for negotiating an indemnity with the transferor or conducting another redundancy consultation process after the transfer, with all the additional delay and costs involved (often sufficient, in the tight-margined environment of outsourcing, to prevent the transaction going ahead).

This is a serious problem for all businesses involved in business sales and the more common outsourcing, which is often being used as a means to restructure business, in recession, to try to preserve both a business and employment.

Some thought needs to be given to ease this legal conundrum of the collective redundancy and TUPE consultation exercises coinciding in these circumstances.

Q 24. What special considerations relating to collective redundancy consultations arise from insolvencies and administrations?

Insolvency situations tend to arise in one of two ways: a single unforeseen event that leads to a rapid demise of the trading entity (failure of major creditor or destruction of premises e.g., by fire or flood) and longer term gradual declines in trading performance that ultimately result in administration or insolvency.

In the case of the former category, it is not clear whether these would be covered by the 'special circumstances' defence set out in the legislation. Further clarity needs to be provided over the circumstances in which this defence operates.

It is also not clear whether the requirement to inform and consult facilitates the sale of businesses in administration as a going concern or if they act to disincentivise this process.

In more gradual cases of insolvency, there is a clear need to consult with employee representatives whilst the company is in trading difficulties but still solvent.

However, it is noted that in some circumstances, carrying out consultation can amount to an acknowledgement of trading difficulties that can lead to problems for businesses obtaining credit, which in turn can actually make the trading position worse and cause more redundancies.

Do you have any other comments that might aid the consultation process as a whole?

Please see the introduction inserted at page 3.

Thank you for your views on this consultation.

Thank you for taking the time to let us have your views. We do not intend to acknowledge receipt of individual responses unless you tick the box below.

Please acknowledge this reply ☐

At BIS we carry out our research on many different topics and consultations. As your views are valuable to us, would it be okay if we were to contact you again from time to time either for research or to send through consultation document

© Crown copyright 2011

You may re-use this information (not including logos) free of charge in any format or medium, under the terms of the Open Government Licence. Visit www.nationalarchives.gov.uk/doc/open-government-licence, write to the Information Policy Team, The National Archives, Kew, London TW9 4DU, or email: psi@nationalarchives.gsi.gov.uk.

This publication is also available on our website at www.bis.gov.uk

Any enquiries regarding this publication should be sent to:

Department for Business, Innovation and Skills
1 Victoria Street
London SW1H 0ET
Tel: 020 7215 5000

If you require this publication in an alternative format, email enquiries@bis.gsi.gov.uk, or call 020 7215 5000.