

**Appendix 3  
Equality Impact Assessment.  
Homes 4 Wiltshire Review.**

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**Stage 1: Screening for Relevance**

Please use the following template to help determine whether an equality impact assessment (EIA) is required.

<b>Name of the Strategy / Policy / Procedure / Practice</b> Homes 4 Wiltshire Review
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Author; Housing Strategy & Support
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Name: Sarah Hartley	Job title and directorate: Performance & Research Officer, EDPH	Date:	Signature:
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<b>Does the strategy / policy / procedure / practice require an equality impact assessment (EIA)?</b> Please answer the following questions.
<b>1. What are the main aims, purpose and outcomes of the strategy / policy / procedure / practice and how do these fit in with the wider aims of the organisation?</b>
Purpose:  Following on from the successful launch of the partnership's Wiltshire wide allocations service in March 2009 it was felt that an early review of the service would assist in improving the way we give access to council and housing association homes. The partnership currently has around 10,000 customers and over thirty landlords offering over 22,000 homes across the county. We want to be sure that landlords are able to make the best use of their homes and that all customers, including the most vulnerable, have good and ready access to the service.  This fits into the following organisational goals: <ul style="list-style-type: none"><li>• High quality, low cost, customer-focused services;</li><li>• Local, open, transparent decision-making;</li><li>• Working together to support Wiltshire's communities, building social capital.</li><li>• Being inclusive and supporting others</li></ul>

<b>2. How will these aims affect our statutory duty to:</b> <ol style="list-style-type: none"><li>1. Promote equality of opportunity?</li><li>2. Eliminate discrimination and harassment?</li><li>3. Promote good community relations and positive attitudes towards disabled people?</li><li>4. Encourage participation of disabled people, including the consideration of more favourable treatment of disabled people?</li></ol>
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### 5. Protect and promote human rights?

1. Promote equality of opportunity – enabling all people to have appropriate accommodation for their needs
2. Eliminate discrimination by providing a service open to everyone.
3. Community relations are of course key to social housing – encouraging communication between communities and positive attitudes. The housing criteria within Homes4Wiltshire encourage the development of mixed and sustainable communities.
4. Encourage participation of disabled people – WSUN has been involved in identifying needs, and the Review specifically considers e.g. accessibility to the CBL system, alternative formats to improve access, and the accommodation needs of disabled people, in order to encourage participation in the housing register.
5. Protect and promote human rights – HRA duty to provide (accommodation) support to asylum seekers; to provide equitable treatment for minority groups.

### 3. Are there any aspects of the strategy / policy / procedure / practice, including how it is delivered, or accessed, that could contribute to inequality? This should relate to all areas of our statutory duties.

N/a – this Review is intended to enable equality in housing provision and should not contribute to inequality.

### 4. Will the strategy / policy / procedure / practice have an impact (positive or negative) upon the lives of people, including members of particular communities and groups? What evidence do you have for this?

The Review has been implemented in order to enable service users, stakeholders and interested parties to comment on the Homes4Wiltshire service. In this sense, the uptake of recommendations made during the consultation period will, it is hoped, positively impact the lives of people in Wiltshire. Assessing the feedback and making changes to the Homes4Wiltshire policy and service in relation to this feedback is an ongoing process (see action plan at end of document).

### 5. Are particular communities or groups likely to have different needs, experiences and attitudes in relation to the strategy / policy / procedure / practice?

The consultation on the Review identified a different attitude between service users and the H4W Partners in regard to the maximisation/minimisation of the housing register; whereby service users on the whole wanted to see a smaller list, thus maximising their own chances of making a successful bid; whereas the Partners wanted to ensure that all in housing need were registered with H4W.

The consultation also identified some competition between the different bands, such that there was a widespread (mis-)conception expressed by applicants not in the platinum band that all available properties were going to applicants in the platinum band.

### Is an EIA required?

If the policy is not relevant to any aspect of the statutory duties or wider equality responsibilities, there is

no need to conduct an EIA. [In this event, please contact the Corporate Equality and Diversity team to discuss this decision](#)

Remember:

'High' relevance will have potential / actual impact on 3 out of the 5 areas under the statutory duties

'Medium' relevance will have potential / actual impact on 2 of the areas

'Low' relevance policies will not have any impact relating to the areas under the statutory duties

The strategy / policy / procedure / practice is assessed as (please delete appropriately):

- HIGH Relevance, therefore a full EIA will be done by 20<sup>th</sup> April 2010

**Author of Screening for Relevance**

Name:	Job title and directorate:	Date:	Signature:

**Director Level Sign-off (if EIA will not be done)**

Name:	Job title and directorate:	Date:	Signature:

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## Stage 2: Full Assessment

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### Step 1– scoping the equality impact assessment (EIA)

Building on the material included at the screening stage, you should begin the EIA by determining its scope. The EIA should consider the impact or likely impact of the policy in relation to all areas of our remit, including human rights. The EIA should be proportionate to the significance and coverage of the policy.

**1.1. Name of the strategy / policy / procedure / practice**

Homes 4 Wiltshire Review

**1.2. What are the main aims, purpose and outcomes of strategy / policy / procedure / practice and how does it fit in with the wider aims of the organisation?**

Purpose:

Following on from the successful launch of the partnership's Wiltshire wide allocations service in March 2009 it was felt that an early review of the service would assist in improving the way we give access to council and housing association homes. The partnership currently has around 10,000 customers and over thirty landlords offering over 22,000 homes across the county. We want to be sure that landlords are able to make the best use of their homes and that all customers, including the most vulnerable,

have good and ready access to the service.

This fits into the following organisational goals:

- High quality, low cost, customer-focused services;
- Local, open, transparent decision-making;
- Working together to support Wiltshire's communities, building social capital.
- Being inclusive and supporting others

**1.3. List the main activities relating to the strategy / policy / procedure / practice and identify who is likely to benefit from it**

The main activities under the Review are;

- Gauging current service provision for households
- Identifying gaps in the provision of current services
- Identifying methods of improvement to the services.

Those who benefit from it will be

- People on the housing register in Wiltshire
- People in need of affordable housing
- Wiltshire Council and other partner agencies because they will work within a common framework to ensure the smooth and equitable delivery of the Homes4Wiltshire service.
- Homes4Wiltshire staff because they will have clear guidance as result of the strategy that will be developed from this strategy statement

**What do you already know about the relevance of the strategy / policy / procedure / practice? What are the main issues you need to consider?**

*Some things to consider:*

- *How is the policy likely to affect the promotion of equality in the areas of age, disability, gender, gender reassignment, race, religion or belief, sexual orientation, or human rights?*
- *How do you think that the policy will meet the needs of different communities and groups?*
- *What consultation has already been undertaken which is relevant to the development of this policy?*
- *Are there any examples of existing good practice in this area – such as measures to improve access to the policy among particular groups?*
- *Do you think that your policy presents any problems or barriers to any community or group?*

**1.4. What data, research and other evidence or information is available which will be relevant to this EIA?**

**Please note that this Impact Assessment is draft and ongoing – assessment to continue in line with the Review.**

1. The Review is likely to affect the promotion of equality in the areas of age and disability, as it considers the housing needs of elderly, young and disabled service users in relation to the provision of adapted or suitable accommodation.
2. The Review aims to address the needs of these groups by ensuring an equitable provision of housing, suitable to their specific needs, and by ensuring access to the service is catered to user needs.
3. The Review involves an open consultation period which ended on 5<sup>th</sup> March 2010; the feedback from this consultation will directly inform the recommendations of the Review.

4. Existing good practice in the area of choice-based lettings identifies access to information and support in bidding as key. The Review expands upon the provision already made in the H4W Policy for providing support to service users unable to make bids on their own, allowing for support in the making of bids and describing the different means of accessing the service.
5. The Review aims to lessen problems or barriers, identified in the consultation process, in accessing the service. The aim is to ensure that all communities and groups are able to access and use the service, with targeted support provided as required. Homes 4 Wiltshire officers will establish what support needs the applicant has and how the applicant should be supported in order to participate in the scheme. Training will be offered to support agencies to enable them to assist their clients in making informed choices. All agencies funded through Supporting People will be able to provide their clients with help on housing issues.

#### 1.5. What further data or information do you need to carry out the assessment?

As the Review process is taken forward, further data and information needs will be identified so that future impact assessments can be strengthened.

## Step 2 – Involvement, Consultation and Partnerships

When considering how you will involve and consult other people in developing the policy, you need to think about internal and external audiences and all areas of the statutory duties.

#### 2.1. Please use the table directly below to outline any previous involvement or consultation which is relevant to this strategy / policy / procedure / practice

Equality target group	Briefly describe what you did, with whom, when and where. Please provide a brief summary of the responses gained and links to relevant documents, as well as any actions.
Age	Age Concern, WASS4YP (Focus group)
Disability	Mental Health and Learning Disability teams, Housing OT, Reablement and the emergency duty team (Focus group)
Gender	
Gender reassignment	
Race	WREC (Focus group)
Religion or belief	WREC (Focus group)
Sexual orientation	
Human rights	
Other	DCS, CAB, Community 4, Alabare, Action for the Blind, Splitz (single parents) (Focus group)

#### 2.2. If consultation and involvement of specific groups did not take place, please state why

Involvement/consultation with agencies other than those listed above has not been directly undertaken as the Policy sets a broad framework which reflects a range of relevant legislation and guidance.

#### 2.3. What do previous consultations show about the potential take-up of any resulting activities or services?

In the development of the Review, consultation with partner agencies took place which included information gathering days and an open consultation with service users, stakeholders and local agencies.

We achieved a balance of partner and service user input by:

- Using a web-based consultation process supplemented by mail-outs and advertising at local access points in order to increase accessibility to the consultation process by service users.

- Providing regular updates and holding partnership meetings attending by partner RSLs, in order to identify unmet needs and to consider options for service improvement.

**2.4. How are external partners involved, or how do you intend to involve external partners, in delivering the aims of this strategy / policy / procedure / practice? (if applicable)**

The following external partners were involved in consulting on the H4W Review:

New Futures  
A2 dominion  
English Churches HA  
Fosseway HA  
Guinness Trust  
Hanover HA  
Hastoe HA\*  
Housing 21 HA  
James Butcher HA  
Jephson HA  
John Groom HA  
Kennet Housing Society\*  
Kingfisher HA  
Knightstone HA  
New Downland HA  
Orbit HA  
Raglan HA  
Ridgeway Community HA  
Salvation Army HA  
Sarsen HA  
Somer Community Housing Trust  
Sanctuary Shaftesbury HA  
Signpost Housing Association  
South Western Housing Society  
Sovereign HA  
Swaythling HA\*  
Westlea HA  
Western Challenge HA  
West Country HA  
Selwood Housing\*  
Wiltshire Rural HA

\* Housing Associations without Charitable Status

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**Step 3 – data collection and evidence**

**3.1. What evidence or information do you already have about how this policy might affect equality, and what does this tell you?**

*Please cite any quantitative (for example, statistical or research) and qualitative evidence (for example, monitoring data, complaints, surveys, focus groups, questionnaires, meetings, interviews) relating to groups having different needs, experiences or attitudes in relation to this project. Describe briefly what evidence you have used.*

Statistical research and surveying indicates:

- That people with learning disabilities and mental health difficulties are considerably more likely to have difficulties accessing the service (source: Social Exclusion Unit, 'Mental Health and Social Exclusion', 2004).
- The Disability Rights Commission states that when organisations impact assess CBL schemes they need to ask the following questions:
  - is advertising accessible?
  - are a property's accessible features advertised?
  - does a mechanism exist to identify the requirements of disabled applicants?
  - is there a mechanism to allow extra time for disabled applicants [for example to make decisions or view properties] if they need it?
  - is there a mechanism for providing support in making applications?
- The ODPM CBL research document ('Piloting Choice Based Lettings – An Evaluation', ODPM, May 2004') published in May 2004 centred on ten programmes that had operated across the country between April 2001 and March 2003. The research identified that in certain circumstances CBL can have a differential impact on certain vulnerable households, both in registering with the system and taking an active part in the bidding process. In particular, rates of bidding from older persons was low. However, the overall message emanating from the pilot projects was not to underestimate the ability of vulnerable households to actively take part in the system. For example, this same research reported a greater uptake in BME households both registering for and accessing accommodation. The research also found no evidence to suggest that CBL would have a differential impact on account of faith or sexual orientation.
- As an update to the above the Department for Communities and Local Government in 2006 published an updated research programme centred on thirteen case study CBL schemes (*'Monitoring the Long term Impact of Choice Based Lettings*, Department for Communities and Local Government, October 2006'). Whilst the report struggled to obtain the necessary data to make any firm conclusions, where data was available it found that the quantitative share of vulnerable households accessing accommodation was higher in representation when compared against like representation on associated waiting lists. What it could not determine however was whether the CBL schemes had acted to the detriment of vulnerable households in accessing the more popular housing stocks. The paper also reported that by and large most schemes had experienced a rising proportion of properties let to BME households with a growing representation from Afro-Caribbean and 'Other' BME households.

### **3.2. What does available data tell you about the potential take-up of any resulting activities or services?**

Assessing national and local research and data (both qualitative and quantitative) has enabled us to assess the potential take-up of the service, and this has informed the Review's key priorities of ensuring equitable access for all to the service. As described above, some vulnerable applicants are known to have difficulties accessing information / making a bid, and the H4W Policy and Review makes provision for the identification of these service users and for their support by the H4W staff. Rural communities are also known to have difficulties in accessing the service, and there is the aim to address this by instituting the Marketing Working Group, which will examine the accessibility provisions of the service. It was noted that initiatives such as the mobile libraries already serve as H4W access points, with the aim of improving access for those living in rural communities.

### **3.3. What additional research or data is required to fill any gaps in your understanding of the potential or known effects of the strategy / policy / procedure / practice? Have you considered commissioning new data or research?**

As the Review process is taken forward, the effects of the Review and of amendments made to the H4W Policy and service as a result of the Review will be monitored by the H4W Partnership Group. Advice will be sought from the Corporate Equality & Diversity Team and from the Housing E&D officer (appointment forthcoming).

In line with CLG good practice guidance, it is a recommendation of this EIA that monitoring take place of the H4W register in order to assess whether specific needs groups are being fairly catered for. Ideally, we should know the type of property bid for, and allocated to, in terms of specific demographics (age, gender, ethnicity, sexuality, disability) and monitor bidding and allocations in order to ensure that local trends are equitable.

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## **Step 4 – Assessing impact and strengthening the strategy / policy / procedure / practice**

*What evidence do you have about how the strategy / policy / procedure / practice will affect different groups and communities in relation to equality and human rights?*

### **4.1. How does / will the strategy / policy / procedure / practice and resulting activities affect different communities and groups?**

*Some things to consider:*

- Is there any potential for, or known, adverse or positive impacts of the policy?*
- You should consider how the policy might affect communities with small populations; people affected by discrimination in multiple areas of equality (age, disability, gender, gender reassignment, race, religion or belief, and sexual orientation); specific interest groups such as small businesses, voluntary sector agencies and other service providers.*
- Are there examples of good practice that can be built on?*
- You may wish to consider how the policy will be delivered or communicated.*

The Review will currently be published in English, but we recognise that it will need to be accessible in various formats, including;

- Translations
- Easy Read
- Audio

We also aim to ensure staff familiarity with the results of the Review process, such that staff are able to understand, adopt and use the principles of the H4W Policy.

The Review aims to identify gaps and to improve the Homes4Wiltshire Policy, that is, to identify housing need and respond to it in a fair and balanced manner. For example, the protection of rural communities through the prioritisation of 'local connection' in the allocation of housing need may adversely impact urban communities; but the Review will aim to balance these needs, and will actively work towards improving housing for all groups.

### **4.2. What measures does, or could, the strategy / policy / procedure / practice include to help promote equality of opportunity?**

*For example, positive measures designed to address disadvantage and reach different communities or groups?*



The H4W service aims to deliver quality services without prejudice or discrimination to meet the needs of all the community; in consultation with interest groups the Review will identify specific measures to help promote equality of opportunity; and this will be monitored in an ongoing and continual manner by the H4W Partnership Group.

**4.3. What measures does, or could, the strategy / policy / procedure / practice include to address existing patterns of discrimination, harassment or disproportionately?**

As the Review process is taken forward, the consultation is intended to identify any issues of discrimination, harassment or dis-proportionality. In this manner, we can address any such issues from a position of knowledge. Where necessary, advice will be sought both from the corporate Equality and Diversity team and the Housing E&D officer (appointment forthcoming). The H4W Partnership will have responsibility for monitoring.

**4.4. What impact will the strategy / policy / procedure / practice have on promoting good relations and wider community cohesion?**

Community participation through consultation and engagement.

**4.5. If the strategy / policy / procedure / practice is likely to have a negative effect ('adverse impact'), what are the reasons for this?**

*Consider and include comments on direct or indirect discrimination.*

The implementation of the findings of this Review process will NOT have any direct adverse impact.

Any indirect discrimination in the implementation of the strategy statement will be monitored through;

- Quantitative data analysis
- Qualitative data analysis
- Assessment of outcomes under relevant performance measures, NIs and comparative data

See also 4.7 below.

**4.6. What practical changes will help reduce any adverse impact on particular groups?**

*For example:*

- *Changes in communication methods, providing language support, collecting data, revising programmes or involvement activities.*
- *Have you considered our legal responsibilities under the Disability Discrimination Act, including treating disabled people more favourably where necessary?*

Providing accessible communications in accordance with DDA.

This Review acknowledges and upholds the social model of disability provided by the DDA.

**4.7. What evidence is there that actions to address any negative effects on one area of equality may affect other areas of equality or human rights?**

As described above, the issue of local connection vs. housing need is known to involve balancing. That is, the protection and sustainment of rural communities involves the prioritisation of a local connection in the allocation of rural properties, through rural exception sites, the provisions for local connection in the H4W service, and also through the section 106 agreements. This action to protect rural communities involves an indirect discrimination against people living in towns, who are proportionally less likely to obtain housing within these rural communities.

**4.8. What will be done to improve access to, and take-up of, services or understanding of the policy / strategy / function or procedure?**

*Some things to consider:*

- *Increasing awareness of the policy among staff.*
- *Reviewing your staffing profile to make sure you reach all parts of local communities.*
- *Encouraging wider public involvement in our work or communications activities.*
- *Encourage different groups, including disabled people, to get involved in what we do.*

- Communicating the strategy statement to various interest groups / external partners
- Capacity building across staff
- Raising staff awareness

Please note that you may need to revisit this section once you have completed the policy development process.

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**Step 5 – Procurement and Commissioning**

**5.1. Consideration of external contractor obligations and partnership working**

*Is the implementation of this strategy / policy / procedure / practice due to be carried out wholly or partly by contractors / commissioning? If yes, have you done any work to include equality and human rights considerations into the contract / service level agreements already?*

*If you have, please set out what steps you will take to build into all stages of the procurement / commissioning process the requirement to consider the general equality duties and equality more broadly.*

*Specifically you should set out how you will make sure that any partner you work with complies with equality and human rights legislation. You will need to think about:*

- *Tendering and Specifications*
- *Processes for awarding contracts*
- *Contract / SLA clauses*
- *Performance measures and monitoring*

The Review process will have partnership involvement. If within the partnership arena, considerations are made to procure contracted services, this will be subject to our equalities and procurement guidelines and relevant strategy

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**Step 6 – making a decision**

**6.1. Summarise your findings and give an overview of whether the strategy / policy / procedure / practice will meet the Council's responsibilities in relation to equality and human rights**

The Review process will further strengthen our commitment to helping those in housing need and to ensure the well being of communities. It will;

- Identify gaps in provision and seek improvement

- Strengthen our response, with our partners, in providing suitable and affordable accommodation to all those in housing need
- Develop citizen-focussed services which involve and reflect the needs of applicants.
- Equip staff to contribute toward the aims of the Review.

We believe that the Review meets the council's responsibility in relation to equality and human rights.

## **6.2. What practical actions do you recommend to reduce, justify or remove any adverse / negative impact?**

*Please note that these should be reflected in the action plan (see Step 8).*

### **This assessment endorses the post-consultation recommendations of the Review that:**

1. Mystery shopping be carried out in order to ensure that all staff are treating our customers equitably.
2. That a rolling programme of staff training be instituted in order to ensure compliance with all relevant legislation and good practice guidance.
3. That 'local connection' should NOT be further prioritised in the banding system, as rural communities already possess high levels of protection and increasing this further would result in indefensible discrimination against urban communities.
4. That the H4W application form be reviewed and possibly changed in order to ensure compliance with the latest EHRC guidance on the monitoring of equalities.
5. That the H4W application form be reviewed and possibly changed in order to ask applicants how they would like to access the service, in order to increase our knowledge of accessibility.
6. That a Marketing Working Group be instituted to examine the logistics and costs of increasing access to the H4W service, for example through newspaper advertising.
7. That research be carried out into the restrictions on banding involved in the 'mixed communities' guidance to ensure that we are not inappropriately categorising people by reference to their band. It is recommended that this research be carried out in conjunction with research into the new 'Fair and Flexible' guidance on banding, which emphasises employment as a criterion of demarcation.
8. That property adverts carry access information, in line with DRC guidance.

### **The EIA further recommends that:**

9. In line with CLG good practice guidance, that monitoring take place of the H4W register in order to assess whether specific needs groups are being fairly catered for. Ideally, we should know the type of properties bid for, and allocated to, in terms of specific demographics (age, gender, ethnicity, sexuality, faith, disability) and monitor bidding and allocations in order to ensure that local trends are equitable.
10. That currently there are no written provisions to allow extra time for disabled applicants (for example to make a decision or view a property) in the H4W Policy, which contravenes the DRC guidance. We note that property turnaround times and associated lost rental income is a key landlord performance indicator, thus putting pressure on the landlord to ensure that this time span is kept to a minimum. It is however recommended that the following text is inserted into the H4W Policy to address this matter and comply with DRC guidance: ***'Consideration will be given to extend both the notice period given to accept or reject an offer of accommodation and/or the tenancy commencement date in circumstances where a disabled person(s) requires such additional time on account of their personal circumstances.'***
11. One of the key objectives of CBL is that it will contribute to community sustainability. Two of the key indicators around community cohesion involve measuring firstly tenancy sustainability and secondly the location of tenancies by socio-economic status (i.e. to ascertain for example if CBL is creating 'clusters' of households that were economically inactive or from the same ethnic background). We recommend that monitoring of this data take place.


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## Step 7 – monitoring, evaluating and reviewing

### 7.1. How will the recommendations of this assessment be built into wider planning and review processes?

*This may include policy reviews, annual plans and use of performance management systems.*

The implementation of any recommendations as result of this Review process will be monitored by the H4W Partnership Group. This will include recommendations for undertaking further reviews and amendments as monitoring information is assessed. This will be a continual process.

### 7.2. How will you monitor the impact and effectiveness of the strategy / policy / procedure / practice?

*This could include adaptations or extensions to current monitoring systems, relevant timeframes and a commitment to carry out an EIA review once the policy has been in place for one year.*

Any direct / indirect impact resulting from the implementation of the Review will be assessed through;

- Quantitative data analysis
- Qualitative data analysis
- Assessment of outcomes under relevant performance measures, NIs and comparative data

The implementation of the findings of this Review will be the responsibility of the Homes 4 Wiltshire Partnership. This is a multi agency group that will meet bi-monthly for the next 12 months in order to ensure delivery of the findings of the Review.

### 7.3. Give details of how the results of the impact assessment will be published

*There is legal requirement to publish assessments. Completed assessments should be first be quality assured and then, once signed off, be published on the Council website, via the Web Team.*

- Impact assessment will be published, once signed-off and approved, on our website and made available to the public via freedom of information
- Outcomes of this impact assessment, and any future subsequent assessments will be made available in to the public

## Step 8 – action plan

Taking into consideration the responses outlined in Steps 1-7, complete the action plan below (if appropriate).				
	Actions	Target date	Responsible post holder and Directorate	Monitoring post holder and Directorate
Involvement, Consultation and Partnerships	To continue the H4W Partnership meetings for the next 12 months in order to ensure successful delivery of the findings of the Review	March 2011		
Data collection and evidence	The Review recommends data collection and evidencing through the Marketing Working Group and the changing of the H4W application form to monitor equalities and accessibility.			
Assessment and analysis	The Review is ongoing at this stage and will be assessed bi-monthly	Ongoing		
Procurement and Commissioning	n/a at this stage			
Monitoring, evaluating and		Ongoing		

reviewing	The H4W Partnership meetings will monitor and evaluate, and make provision for any further reviews.			
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## Sign-off

**The final stage of the EIA is to formally sign off the document as being a complete, rigorous and robust assessment**

The strategy / policy / procedure / practice has been fully assessed in relation to its potential effects on equality and all relevant concerns have been addressed.

### Author of strategy / policy / procedure / practice and EIA

Name:	Job title and directorate:	Date:	Signature:
Graham Hogg	Service Director – Housing		

### Quality check: screening document has been checked by:

Name:	Date:	Signature:
Sarah Hartley		

### Director level (sign-off)

Name:	Job title and directorate:	Date:	Signature:
Graham Hogg	Service Director – Housing		