Equality Impact Assessment [version 2.9]



Title: Housing Moving Forward Together IT Programme (mandate)		
☐ Policy ☐ Strategy ☐ Function ☐ Service ☐ New		
☐ Other [please state] IT Change programme	\square Already exists / review \square Changing	
Directorate: Resources	Lead Officer name: Myriam Selfe	
Programme Manager: Stewart McDermot		
Service Area: Change Services	Lead Officer role: Programme Manager	

Step 1: What do we want to do?

The purpose of an Equality Impact Assessment is to assist decision makers in understanding the impact of proposals as part of their duties under the Equality Act 2010. Detailed guidance to support completion can be found here Equality Impact Assessments (EqIA) (sharepoint.com).

This assessment should be started at the beginning of the process by someone with a good knowledge of the proposal and service area, and sufficient influence over the proposal. It is good practice to take a team approach to completing the equality impact assessment. Please contact the <u>Equality and Inclusion Team</u> early for advice and feedback.

1.1 What are the aims and objectives/purpose of this proposal?

Briefly explain the purpose of the proposal and why it is needed. Describe who it is aimed at and the intended aims / outcomes. Where known also summarise the key actions you plan to undertake. Please use <u>plain English</u>, avoiding jargon and acronyms. Equality Impact Assessments are viewed by a wide range of people including decision-makers and the wider public.

Housing IT provides the tools required to deliver a range of housing services to the citizens of Bristol.

Multiple systems are reaching end of contract or end of life. This brings an opportunity to explore and implement the best IT solutions available.

To manage these opportunities, it is proposed that a housing IT transformation programme is developed and implemented. The purpose of the programme is to enable change and put in place tools that will allow Housing and Landlord Services to enhance service delivery, achieve efficiencies and improve working practices. This will support delivery of Moving Forward Together, our service transformation plan.

The programme will explore options to replace end of contract applications and to deliver un-met business needs and requirements including:

1. **Housing management** and case management system: current contract ends May-24 (extended for two years from 2022);

This application is used to manage around 30,000 residential and non-residential council tenancies and deliver critical services such as letting process, tenancy management, provision of a repair service, rent charging and arrears management.

2. Housing needs system: current contract ends May-24 (extended for two years from 2022);

This solution is used to manage the housing register across the Bristol Housing Partnership, Home Choice Bristol and homelessness prevention. The application is used by Bristol City Council and several registered social landlords.

3. **Asset management** system: current contract ends May-24 (extended for two years from 2022)

This application is used to manage the Housing's stock, condition, compliance and determine investment priorities on the 27,500 dwellings owned by Housing & Landlord Services.

4. **Field service** management system (scheduling): contract ends in July 2023 and the system will be reaching its end of life. Support will be extended in line with the above.

This application is used by about 400 users, mainly repairs operatives who spend 90% of their time on site, carrying out repairs in council homes but also surveyors and schedule planners. The solution automatically schedules planned, and responsive repairs based on complex business rules, ensuring an efficient use of repair resources.

5. **Private housing case management**: the system is reaching the end of contract and end of life in May 24

This case management solution is used by Private Housing and Regulatory Services to administer HMO licencing, private tenancy issues and trading standards, pest control and anti-social behaviour.

6. **Housing support case management**: contract ends in May 24 (extended for two years from 2022)

Used mainly by the Housing Support team as their register for housing support needs and external service providers as a support case management solution.

- 7. **Job costing solution**: there is no solution in place, functionality is required to calculate the total repair job costings and support analysis of value for money and savings opportunities;
- 8. **Building compliance** and information: functionality required to meet the new legislative requirements for regulating the safety of high-rise blocks;
- 9. **Digital Services**: explore opportunities for improvement, including more opportunities for users to choose self-service;
- 10. **Data and analytics**: review options to improve data and analytics and align to the corporate solution;

The programme is a feasibility stage with procurement due to start pending the approval of the procurement approach recommended in the Outline Business Case.

1.2 Who will the proposal have the potential to affect?

☐ Bristol City Council workforce	⊠ Service users	\square The wider community
☐ Commissioned services	☐ City partners / Stakeholder organisations	
Additional comments: external contractors		

1.3 Will the proposal have an equality impact?

Could the proposal affect access levels of representation or participation in a service, or does it have the potential to change e.g. quality of life: health, education, or standard of living etc.?

If 'No' explain why you are sure there will be no equality impact, then skip steps 2-4 and request review by Equality and Inclusion Team.

If 'Yes' complete the rest of this assessment, or if you plan to complete the assessment at a later stage please state this clearly here and request review by the Equality and Inclusion Team.

⊠ Yes	□ No	[please select]	

Step 2: What information do we have?

Data / Evidence | Summary of what this tells us

2.1 What data or evidence is there which tells us who is, or could be affected?

Please use this section to demonstrate an understanding of who could be affected by the proposal. Include general population data where appropriate, and information about people who will be affected with particular reference to protected and other relevant characteristics: https://www.bristol.gov.uk/people-communities/measuring-equalities-success.

Use one row for each evidence source and say which characteristic(s) it relates to. You can include a mix of qualitative and quantitative data e.g. from national or local research, available data or previous consultations and engagement activities.

Outline whether there is any over or under representation of equality groups within relevant services - don't forget to benchmark to the local population where appropriate. Links to available data and reports are here <u>Data, statistics</u> and intelligence (sharepoint.com). See also: <u>Bristol Open Data (Quality of Life, Census etc.)</u>; <u>Joint Strategic Needs</u>
<u>Assessment (JSNA)</u>; <u>Ward Statistical Profiles.</u>

For workforce / management of change proposals you will need to look at the diversity of the affected teams using available evidence such as <u>HR Analytics: Power BI Reports (sharepoint.com)</u> which shows the diversity profile of council teams and service areas. Identify any over or under-representation compared with Bristol economically active citizens for different characteristics. Additional sources of useful workforce evidence include the <u>Employee</u> Staff Survey Report and Stress Risk Assessment Form

Source [Include a reference where known] Source: ONS	January or what	inis tens us	
2020 Mid-Year Population Estimates		Bristol population %	BCC Tenant population % (tenants / leaseholders)
-Equality Profile report 01 – Tenants and Leaseholders as at 01/04/2022	Black, Asian And Minority Ethnic	16 (2011)	21
, ,	Female	49 (2021)	62
	Male	51 (2021)	36
	Disability	8 (2011)	30.5
	LGB	9 (2018/19 QoL)	1.4
	Trans	N/A	N/A

0 – 15	18.4	0.2	
16-29	39	2	
30-39	24	31.4 (25-44)	20.6 (45-54)
40-49	16	21.1 (55-64)	
50-64	21	24.4	

Age:

- Overall, there are more children living in Bristol than people aged 65 and over. Almost one in every five people living in Bristol is aged under 16.
- Bristol has a higher proportion of working age people than nationally (69% against 62% nationally).

Disability:

- More than three times as many BCC tenants are a disabled person, than in comparison to the Bristol population
- Most reported types of disabilities (11%-12%) include: long term illness, mental distress and mobility impairment

Age:

 Under-representation of young people (16-24) as BCC tenants and aging resident base (50-64 years represent 31% of BCC tenants population in comparison to 14% of Bristol population). This is an over representation, and this group do report they are less confident in using technology.

Source: 2011 Census & BCC Workforce Diversity Head count for Housing & Landlord Services (01/04/2022)

	Bristol population %	H&LS employees %
Black, Asian And Minority Ethnic	16 (2011)	12
Female	49 (2021)	38
Male	51 (2021)	63
Disability	12 (2021)	9.6
LGB	9.1	4.1
Trans	N/A	N/A
16-29	39	12.4
30-39	24	24.1
40-49	16	24.6

	50-64	21	38.8
Source: Online Nation 2021, Ofcom report	 61 % of UK adult 83% of UK adult Internet take up and 86% of UK adult Going online is a Largest increase Average time sp 6% of UK house The smartphone apart from thos Reliance on smapeople and thos Comms platform: Facebook's What reaching 67% of Social media Eighty-two per of Facebook and Incent of social modes and incent of social modes are solds said it was Instagram was rolds said it was TikTok was one than half (54%) Older adults are service Nextdoor 	ts with 10+ years' exposes who say they are conduse: Its used the internet in almost universal amore in users with the overent online per day: 3 holds do not have accepted as the most-used development of the post of adults aged 65+. The internet in lower socio-econdusts applies the most post of adults in Sept cent of adults aged 16 instagram continue to edia users aged 65+ usial media service the more popular with you their main service. Of the platforms with of 16-24s, said they he more likely than you or. Nextdoor is an applies.	Sept 2020 (45.5m adults aged 18+) ng 18-54 years olds or 54 year olds. h30 ess to the internet vice for accessing the internet for all age groups he internet is more prevalent among younger omic groups. bular messaging and calling service in the UK, ember 2020 + who go online have a social media profile, and be the most widely used platforms. Ninety-one per se Facebook, and nearly half (49%) of these said it
Quality of life survey 2021-22	users) The QoL survey indi services include:	cates that the groups	that are the least comfortable with using digital
	- White Britis	h – 79.8%	
	- Groups age	d 50 years and older -	58.6% ; and 65 years and older: 44.4%
	- People who	have a disability – 61	.5%
	 People who are renting from BCC – 57.9% (vs renting from Private Landlords wh 90.8% - likely to be students) Additional (new) indicators to note are that 82% of people are comfortable using digital services, and 42% are comfortable using smart technologies, though both are significant lower for some groups; older people (65+) are lowest for both. being "comfortable using digital services" is also the lowest in the top 10% most deprived areas (75.4%) 		
BRE Integrated Dwelling Level Housing Stock Modelling and Database for	social rented. Over		% are owner occupied, 30% private rented and 20% dwellings in the private rented sector across Bristol of 19%.

Bristol City Council February 2020 This data reflects that the percentage of the dwellings (private sector landlords and tenants) (30%) may be affected by the change of digital services. This includes landlords in the private rented sector would be using the new digital services to ensure their properties are licenced.

Additional comments:

No equalities data is currently being collated for users registered to the Tenant Account. Despite requesting the information from Digital Services in January 2022, the team has been unable to fulfil the request to date due to capacity. However, the following information has been identified:

- Out of an estimated 40k adult with a BCC tenancy, there are only 5,846 individual tenant accounts.
- Between May 20-May 21, the Unique page views for https://www.bristol.gov.uk/your-account/tenant was used on average of 2,679 per month

Little research has been made to find out why only 14% of our tenants have an account or indeed the reasons for such little traffic on the Tenant account sign-in page however, one can imagine that some of the reasons may be attributed to: registration issues; lack of sufficient offer to entice users on the tenant account; digital exclusion (lack of access to technology, literacy/numeracy, confidence...), lack of awareness of the Tenant Account.

The gaps in account take up will need to be addressed when we communicate the changes to tenants.

2.2 Do you currently monitor relevant activity by the following protected characteristics?

⊠ Age	□ Disability	☐ Gender Reassignment
☐ Marriage and Civil Partnership	□ Pregnancy/Maternity	⊠ Race
□ Religion or Belief	⊠ Sex	

2.3 Are there any gaps in the evidence base?

Where there are gaps in the evidence, or you don't have enough information about some equality groups, include an equality action to find out in section 4.2 below. This doesn't mean that you can't complete the assessment without the information, but you need to follow up the action and if necessary, review the assessment later. If you are unable to fill in the gaps, then state this clearly with a justification.

For workforce related proposals all relevant characteristics may not be included in HR diversity reporting (e.g. pregnancy/maternity). For smaller teams' diversity data may be redacted. A high proportion of not known/not disclosed may require an action to address under-reporting.

No equalities data available for Tenant Account holders. This is something that we hope, we would be able to collate as part of the upgrade of our digital services. However the generic data tell us that older people are less likely to engage with digital services.

The Private Housing sector is also no longer collecting equalities data. This is related to operational changes within the organisation. This section has identified the need in the future to capture and report on the profile of service users (cross-tenure and by service area). It is anticipated that this need will be met through the delivery of improved forms and new reporting capabilities.

We are also awaiting data on which equalities groups are on the housing register, this information will be available to insert into the EqIA if the proposal is agreed.

2.4 How have you involved communities and groups that could be affected?

You will nearly always need to involve and consult with internal and external stakeholders during your assessment. The extent of the engagement will depend on the nature of the proposal or change. This should usually include individuals and groups representing different relevant protected characteristics. Please include details of any completed engagement and consultation and how representative this had been of Bristol's diverse communities. See https://www.bristol.gov.uk/people-communities/equalities-groups.

Include the main findings of any engagement and consultation in Section 2.1 above.

If you are managing a workforce change process or restructure, please refer to <u>Managing change or restructure</u> (<u>sharepoint.com</u>) for advice on consulting with employees etc. Relevant stakeholders for engagement about workforce changes may include e.g. staff-led groups and trades unions as well as affected staff.

No engagement carried out at this stage (outline business case) of the programme.

We will ensure that any groups who we know are less likely to engage with these new technologies will be targeted. This includes disabled tenants, older people and those people in deprived communities where lack of affordability for Wi-Fi / data / technology is a real challenge.

It is anticipated that engagement will take place particularly as the programme is testing new digital services, engaging with a wide range of service users.

2.5 How will engagement with stakeholders continue?

Explain how you will continue to engage with stakeholders throughout the course of planning and delivery. Please describe where more engagement and consultation is required and set out how you intend to undertake it. Include any targeted work to seek the views of under-represented groups. If you do not intend to undertake it, please set out your justification. You can ask the Equality and Inclusion Team for help in targeting particular groups.

We are proposing that engagement and consultation with stakeholders be included as a communication plan activity as we progress to OBC for each of the projects identified. A communication plan will be the best way to get the message out with regards to changes, and communities that will be targeted.

Step 3: Who might the proposal impact?

Analysis of impacts must be rigorous. Please demonstrate your analysis of any impacts of the proposal in this section, referring to evidence you have gathered above, and the characteristics protected by the Equality Act 2010. Also include details of existing issues for particular groups that you are aware of and are seeking to address or mitigate through this proposal. See detailed guidance documents for advice on identifying potential impacts etc. Equality Impact Assessments (EqIA) (sharepoint.com)

3.1 Does the proposal have any potentially adverse impacts on people based on their protected or other relevant characteristics?

Consider sub-categories (different kinds of disability, ethnic background etc.) and how people with combined characteristics (e.g. young women) might have needs or experience particular kinds of disadvantage.

Where mitigations indicate a follow-on action, include this in the 'Action Plan' Section 4.2 below.

GENERAL COMMENTS (highlight any potential issues that might impact all or many groups)

Groups adversely impacted are generally people who experience socio-economic deprivation – as such in terms of tenure, tenants are more likely to be affected by the changes than private landlords.

The groups most likely to be amongst the BCC Tenant population would be older people, and disabled people.

- Digital exclusion lack of access to technology (preference) or mobile data/Wi-Fi___33
- Platforms (web or app) are not accessibility compliant and/or difficult to use which would deter wider access / take-up

Whilst the provision of Wi-Fi devices is out of scope for residents and tenants, it is anticipated that the programme will put in place a number of measures (through procurement process, training etc.) to help familiarise service users to the new technology. In addition to this, the deployment of the new online digital solutions will be planned and incremental so as to reduce the possible adverse impacts change could bring about.

It is anticipated that housing staff would receive training and the hardware required to use new applications / digital services and discharge their duties.

How to mitigate the impact of IT changes and new system implementations:

- New web-based systems, websites and apps will be required to meet accessibility regulations to ensure that they can be used by as many people as possible
- Digital services to be device agnostic but with a preference for useability on smartphone (device of choice for people on lower income)
- Involve users and residents in the development and testing of the solutions to ensure that the solutions are designed by users for users (maximise use/buy-in).
- We will be looking to simplify our housing digital services and build into our requirements the use of 'assistive' functionality such as chatbots and virtual agents to increase not only usage of digital services but also from a broader range of residents that may not be using the services at present.

PROTECTED CHARACTER	ISTICS
Age: Young People	Does your analysis indicate a disproportionate impact? Yes ☐ No ☒
Potential impacts:	Younger people not accessing digital services if the new products do not consider their
	preferences for interacting digitally (i.e. mobile app vs website)
Mitigations:	Consider the development of a Tenant Account / BCC Housing mobile app to access
	housing digital services as well as upgrade of website as solutions to be developed
Age: Older People	Does your analysis indicate a disproportionate impact? Yes $oxtimes$ No $oxtimes$
Potential impacts:	With computers being the most popular mode of access among people aged under 65+, we may find that older people are most digitally excluded (due to cost of laptop). Older people are less likely to have home internet access (18% of over-64s do not have home internet access), as are those in lower socio-economic groups. Older people are overrepresented in this service so mitigations will need to be considered carefully.
Mitigations:	Investigate provision of communal desktops in STOP schemes
	 Wardens will have access to internet when doing visits and able to show and tell, follow up on calls with the tenants Continue with the provision of digital services (website); explore the use of chatbots and virtual agents to help users navigate the website and make the experience more valuable Training – short videos on how to use the services A telephone service would be made available for tenants who do not have other means to contact the council any other way
Disability	Does your analysis indicate a disproportionate impact? Yes $oximes$ No $oximes$
Potential impacts:	Disabled people may experience barriers in using a mobile app or other digital services if they are not compatible with assistive technology or inaccessible in other ways. Some disabled people will require alternative ways to access and contact services.
Mitigations:	 New digital services (applications and websites) to be accessibility compliant to ensure that they can be used by as many people as possible Provide alternative contact methods such as telephone for those that need them as appropriate.
Sex	Does your analysis indicate a disproportionate impact? Yes ☐ No ☒
Potential impacts:	The QoL survey states that women are slightly less confident in using digital services than men.
Mitigations:	Provision of training to increase the confidence of groups who are less confident.
Sexual orientation	Does your analysis indicate a disproportionate impact? Yes \square No \boxtimes
Potential impacts:	
Mitigations:	
Pregnancy / Maternity	Does your analysis indicate a disproportionate impact? Yes \square No \boxtimes
Potential impacts:	
Mitigations:	
Gender reassignment	Does your analysis indicate a disproportionate impact? Yes \square No \boxtimes
Potential impacts:	
Mitigations:	
Race	Does your analysis indicate a disproportionate impact? Yes $oxtimes$ No $oxtimes$

Potential impacts:	Service users for whom English is not their first language may have difficulties accessing
	our digital services if no provision is made for translation. They may also lack confidence
	in accessing digital services.
Mitigations:	Ensure digital solutions developed comply with accessibility regulations; explore
	possibility in the requirement for links to online translator for users to view the
	website in the required language e.g., add-ons that can be tagged onto website
	pages to auto-translate the content of the pages. The user selects the language
	required and the page content is automatically translated into said language.
Religion or Belief	Does your analysis indicate a disproportionate impact? Yes \square No \boxtimes
Potential impacts:	
Mitigations:	
Marriage &	Does your analysis indicate a disproportionate impact? Yes ☐ No ☒
civil partnership	
Potential impacts:	People who are living on their own may not have the support of a partner to help them
	access online services. According to the QoL survey, this would be particularly true for
	50+ years old (38.5%), 65+ years old (46.1%), disabled people (40.7%) and generally BCC
	council tenants (38.3%)
Mitigations:	
OTHER RELEVANT CHAR	RACTERISTICS
Socio-Economic	Does your analysis indicate a disproportionate impact? Yes $oxtimes$ No $oxtimes$
(deprivation)	
Potential impacts:	Most likely to be digitally excluded due to socio-economic deprivation as the
	circumstances may limit access to either the technology or access to data / wi-fi.
	Possible lack of confidence in accessing digital services; possible literacy and numeracy
Mitigations:	Raise awareness amongst tenants of free wi-fi in and around Bristol
	Explore options to provide training e.g. via BCC Community Learning
Carers	Does your analysis indicate a disproportionate impact? Yes $oxtimes$ No $oxtimes$
Potential impacts:	Research shows that – 1 in 5 people aged 50-64 are carers; 1.3m people in England and
	Wales aged over 65 are carers.
Mitigations:	need for intuitive, easy to use digital platforms
	staff training in housing digital services to facilitate show and tell with BCC tenant
	population; consider use of the same platforms between BCC Tenant Population
	and housing staff to facilitate skill transfer.
Other groups [Please ad	ld additional rows below to detail the impact for other relevant groups as appropriate e.g.
	Looked after Children / Care Leavers; Homelessness]
Potential impacts:	
Mitigations:	
-	•

3.2 Does the proposal create any benefits for people based on their protected or other relevant characteristics?

Outline any potential benefits of the proposal and how they can be maximised. Identify how the proposal will support our <u>Public Sector Equality Duty</u> to:

- ✓ Eliminate unlawful discrimination for a protected group
- ✓ Advance equality of opportunity between people who share a protected characteristic and those who don't
- ✓ Foster good relations between people who share a protected characteristic and those who don't

Several high-level benefits have already been identified. These include:

- More up to date applications and online offer, with more accessible and user-friendly features
- Solution that meets accessibility requirements (more recent solution than existing), thanks to identification of accessibility requirements
- Improved digital services offered, with automation of digital services into back-office system
- Improved utilisation of analytics to help shape and target services to the people who need it most (utilisation of visualisation to present key data)

The upgrade of Housing's digital services will provide the opportunity to understand the user experience (UX requirements) and redesign the product(s) for a user perspective with potential simplification of the application(s).

In addition to this, the exploration of artificial agents and chatbots to assist users when accessing our services online. It is hoped that such changes would increase the amount of tenant accounts being registered from a diverse spectrum of tenants / leaseholders (than assumed at present):

- Increase in younger people being engaged digitally with Housing services
- Increase in older population
- Compliance with accessibility regulations should lead to a more inclusive use of our digital offer.

Increase in digital services take-up lowers minimises the need for residents to call the contact centre and travel to the city centre to get things done (cost of travel / reduction of congestions and exposure to CO emissions (better health)) for most vulnerable groups. In addition to this, it will enable BCC to adhere to the new Social Housing White Paper legislation.

User testing will take place with tenants and staff to ensure that any issues are realised up front and before implementation.

Step 4: Impact

4.1 How has the equality impact assessment informed or changed the proposal?

What are the main conclusions of this assessment? Use this section to provide an overview of your findings. This summary can be included in decision pathway reports etc.

If you have identified any significant negative impacts which cannot be mitigated, provide a justification showing how the proposal is proportionate, necessary, and appropriate despite this.

Summary of significant negative impacts and how they can be mitigated or justified:

The programme is currently at the stage of starting a procurement exercise to identify the solution(s) to be implemented. Should the programme fail to action the proposed activities, the solution would limit access to the new services we are wanting to change.

Mitigation will be at minimum compliance to the accessibility regulations and at best, involve a working group of residents to capture requirements and test design solutions. There may be limitations in the budget in terms of solutions developed however these will not negatively impact disabled, older people or people on a low income.

Summary of positive impacts / opportunities to promote the Public Sector Equality Duty:

Involvement of the public in the design/selection of the solutions would encourage take-up and hopefully a wider and more diverse spectrum of users.

4.2 Action Plan

Use this section to set out any actions you have identified to improve data, mitigate issues, or maximise opportunities etc. If an action is to meet the needs of a particular protected group, please specify this.

Improvement / action required	Responsible Officer	Timescale
Compliance to the Accessibility Regulations to be sought for the solutions identified / procured (etc). – Digital Services checks and sign-off	Myriam Selfe	Dec 2022(tbc)
Investigate with Tenant Involvement team how users (tenants / leaseholders) may take part in the development of the digital solutions that are aimed at them. Include in project scope as an activity.	Myriam Selfe	Dec 2022(tbc)
Put in place a mechanism to report on profile of tenant account users	Myriam Selfe	Dec 2024

Improvement / action required	Responsible Officer	Timescale
Profiling capabilities for Private Housing (HMO, private landlord	Tom Gilchrist	Dec 2024
services)		
Equalities data for groups on the housing data will need to be	Myriam Selfe	Dec 2022
collected to inform which groups are most affected if the new		
system is not in place		
Recommend for individual EQIA to be completed by project	Stewart McDermott	Dec 2022
managers in the Housing IT TP for the areas of the system(s) they		
will be completing		

4.3 How will the impact of your proposal and actions be measured?

How will you know if you have been successful? Once the activity has been implemented this equality impact assessment should be periodically reviewed to make sure your changes have been effective your approach is still appropriate.

- The EQIA will need to be reviewed and updated as the programme gets more confident about the products to be implemented, to include wider consultation as part of the process – as part of the FBC. Each project would require its own EqIA.
- Expectation for the activities above to be included in the FBC / Project(s) scopes when these have been further defined.
- Explore inclusion of actions in the H&LS E&I action plan / backlog so that a record is kept outside the programme's remit (so greater transparency)

Step 5: Review

The Equality and Inclusion Team need at least five working days to comment and feedback on your EqIA. EqIAs should only be marked as reviewed when they provide sufficient information for decision-makers on the equalities impact of the proposal. Please seek feedback and review from the <u>Equality and Inclusion Team</u> before requesting sign off from your Director¹.

Equality and Inclusion Team Review: Reviewed by Equality and Inclusion Team	Director Sign-Off: Donald Graham, Director Housing and Landlord Services
	Conably
Date 27/4/2022	Date: 26/05/2022

¹ Review by the Equality and Inclusion Team confirms there is sufficient analysis for decision makers to consider the likely equality impacts at this stage. This is not an endorsement or approval of the proposal.