

EXECUTIVE

30 JULY 2012

0-19 “Core Offer” Strategic Commissioning Review - Recommendations for future commissioning & decommissioning of activities, interventions and services.

Supplementary information for Executive.

Response to issues raised by Special CYPs Scrutiny Commission, 10 July 2012

Resolution (a)

The Executive makes every effort to facilitate funding from the Dedicated Schools Grant to organisations adversely affected by the review, such as Belgrave Playhouse.

Response (a): The funding for extended services is now fully delegated to schools, and schools have an additional £9.5 million of pupil premium for the most disadvantaged children to fund services which will have a positive outcome on their attainment outcomes.

Current decommissioning proposals for after school provision result in an annual saving of £219,000 to the authority. Schools balances currently stand at £21.5 million in the City. Further details on the financial position in relation to this item are contained in page 81 of the report (Appendix 7).

Schools are already aligning this funding to a range of provisions including after school and breakfast club provisions. Work to involve schools to date includes:

- Briefing to schools on the proposals
- Letter to school heads and governing bodies on 23 September 2011 recommending a range of pupil premium related early prevention activities and interventions evaluated as being effective by the Sutton Trust.
- Letter to schools in May to remind them of the Review, key proposals and to invite responses during the Representation Period
- Letter to all head teachers and chairs of governors in July 2012 to advise again of proposals and likelihood of further discussion in the autumn term with regard to their potential to pick up funding for current after school services

Early in the autumn term work will be progressed across Schools' Development Groups and with individual schools whose pupils are known to access current provision to support the identification of funding. Initial conversations suggest that some schools are already indicating an interest in ensuring these activities continue to be funded.

Resolution (b)

The Executive satisfy itself that the service provided by Homestart can be satisfactorily delivered by the Children's Centres, particularly in relation to home visits.

Response (b) The City Council is not seeking to replicate the current Home Start model but is seeking to ensure that home visits are aligned more closely to the comprehensive programme of activities and interventions that Children's Centres and partners can deliver for families.

The City Council envisage that home visits will continue to be a part of the activities and interventions delivered by Children's Centres and that the frequency and content of these will be dependent upon the needs of the individual family concerned.

Trained Children's Centre staff already support families in their own homes. This support includes some volunteers. Children's Centres provide support to families based on clear plans and with clear objectives for improvements for children. Families engaged with are traditionally hard to reach groups and are targeted for intervention. The nature of a planned programme of interventions enables more measurable outcomes for children.

This model enables family support to be delivered as part of integrated services and promotes families' engagement with wider integrated services. Support from volunteers is part of this provision with engagement of parents occurring through centre based activities and group work as well as parent forums and home visits.

More detail on the value for money provided through Children's Centres is included as **Appendix 9** in the report.

Resolution (c)

The Executive explore whether there are other streams of funding to allow the Sharma Women's Centre to continue to deliver training opportunities to women, particularly from BME communities, which assist them to gain employment

Response (c) The Education and Children's Services Department does not currently fund training for women into employment. The current proposal impacts upon crèche and after school provision.

Support will be given for liaison with schools re the potential of them funding after school provision in the future. This point is addressed in **Response (a)** above.

The childcare element of the work now needs to be sourced from the Nursery Education Grant which can be accessed by the service from this point. Support has been given and will continue to be given to enable Sharma Women's Centre to look at how this funding can be used to fund their pre-school provision.

Additionally, parents attending some adult learning activities are able to access funding from other sources for crèche provision. We will offer support to the Centre to make the necessary links and explore how they can support parents to access these courses.

Resolution (d)

The need for Executive to be presented with an updated Equality Impact Assessment in respect of the proposals, given the acknowledgement at the Commission meeting that the EIAs presented were draft only and needed to be updated in the light of further representations received

Response (d) An EIA that takes into account the most recent feedback from the Representation Period and scrutiny meeting is presented below.

Resolution (e)

The need for the Executive to pay careful attention to ensure that services have been accurately matched to interventions, given the representations made at the meeting regarding some mis-matching having occurred at earlier stages of the Review.

Response (e) A key objective of the Representation Period was to provide organisations with an opportunity to challenge the matching of services to interventions and activities. A number of organisations chose to do so and these have been investigated.

Details of the representations received on the issue of matching are included on pages 51 to 53 of the report (**Appendix 3**) with 8 changes made to the matching proposed as a result. All representations received on this issue have been examined.

Trevor Pringle

Director, Young Peoples Services

27 July 2012

Equality Impact Assessment for Service changes / Budget proposals



An EIA is a tool which will help you assess whether there are any positive or negative equality impacts on people affected by proposed changes requiring formal decision.

Service change involves redesigning or reshaping, (and in some cases the removal of) current service provision – whether directly provided by Council officers or commissioned by the Council for provision by an external provider.

Budget proposals should arise from service changes that you are considering throughout the year in light of the current financial climate. The EIA for budget proposals should cover the same issues as considered for service changes.

Our public sector equality duty requires us to ensure that we do not discriminate against any protected group or person with protected characteristics (see below) covered by the Equality Act 2010 when taking decisions that affect them. Potential negative impacts that we disregard or ignore could mean discrimination. We also have a duty to actively promote positive impacts that advance equality of opportunity. The protected characteristics covered by the Equality Act 2010 are:

- Age
- Disability
- Gender reassignment
- Pregnancy and maternity
- Race
- Religion or belief
- Sex
- Sexual orientation.

What to do: The service change / budget proposal EIA contains 3 steps:

Step 1 The proposal

This part is at the start of the planning process. It sets out the service user profile, the proposed change to the service, and potential equality impacts arising as a result of the proposal.

Step 2 Consultation

This part highlights the outcome of consultation with service stakeholders about the service change proposal and likely equality impacts.

Step 3 The recommendation

The final part of the EIA identifies any changes made to the original proposal in Step 1 as a result of consultation and further consideration.

Equality Impact Assessment for service changes / budget proposals

| | |
|------------------------|---|
| Name of service | Various services in scope of the Investing in our Children Strategic Review (see impact assessment for details) |
|------------------------|---|

Date of assessment:

| Start date | Completion date |
|-------------------|------------------------|
| 22 -02 -2012 | 23-07-12 |

| | |
|---|--|
| Lead officer and Contact details | Trevor Pringle/Sally Vallance |
| List of other(s) involved | Equality officer: Sonya King Finance officer: |

What is this EIA about?

(Please tick✓)

| | |
|--|---|
| Budget proposal for existing service or service contract to achieve savings | ✓ |
| Budget proposal for new or additional service expenditure | |
| Budget proposal for capital expenditure | |
| Commissioning a new service or service contract | ✓ |
| Changing or removing an existing service or service contract | ✓ |

Step 1: The proposal (how you propose to change the service)

Question 1:

What is the proposal/proposed change?

The proposed changes to services in scope of the IIOC strategic review are included in the accompanying impact assessment. Proposals range from no change to withdrawal of funding.

This EIA will be a working document and informs the implementation of the review and decision making process. Previous EIA's have been carried out to inform early stages of the review and consultation that took place in the summer of 2011. This version of the EIA is informed by changes that are proposed at this stage. As further work takes place e.g. proposals for the budget and how this will be allocated to services, a further version of the EIA will be produced to take account of additional individual changes.

Who will it affect and how will they likely be affected?

The changes will potentially affect the following people:

- The services themselves, their staff and potentially their management boards
- Users of the services

The market of provision for Children's Services in Leicester

Question 2:

What is the equality profile of current service users?

No up to date information is held on the profile of users. A question about equality impacts on organisations and users of current services is therefore included in the representation questionnaire.

Do you anticipate any changes to your service user profile as a result of your

proposal/proposed change? If yes, how will it change?

Without detail on user profiles it is difficult to understand the profile of those affected by service withdrawal. However, as previously indicated, alternative services are available to vulnerable families which should minimise changes to the profile for the city overall.

What are the main service needs and/or issues for those receiving the service because of their protected characteristic?

| | Service needs and/or issues by protected characteristic |
|--------------------------------|---|
| Age | Services are currently provided to children, young people and families. |
| Disability | Services are accessed by children and families with disabilities although figures to show how often this is the case are not available. |
| Gender reassignment | All services are available to children, young people and families experiencing gender reassignment. One service specifically sets out to offer support to this group. |
| Pregnancy and maternity | Some services are offered to pregnant women, particularly where there is already a child in the household. Many services are already targeted at more vulnerable families. |
| Race | All services are accessible to people from any racial background although one service is specifically set up for mixed heritage young people. Some services are more likely to address the needs of one or more particular ethnic groups due to the current user profile. Data is not available to evidence where this is the case. |
| Religion or belief | All services are accessible to people from any religion. Some services are more likely to address the needs of one or more particular religious groups on a regular basis due to the current user profile. Data is not available to evidence where this is the case. |
| Sex (gender) | Services are available to both genders with one service being specifically aimed at girls. |
| Sexual orientation | All services are available to LGB children, young people and families. One service specifically sets out to offer support to this group. |

Question 3:

Will the proposal have an impact on people because of their protected characteristic? Tick the anticipated impact for those likely to be affected and describe that impact in the questions 4 & 5 below.

| | No impact ¹ | Positive impact ² | Negative impact ³ | Impact not known ⁴ |
|--------------------------------|------------------------|------------------------------|------------------------------|-------------------------------|
| Age | | | ✓ | |
| Disability | ✓ | | | |
| Gender reassignment | ✓ | | | |
| Pregnancy and maternity | ✓ | | | |
| Race | | | ✓ | |
| Religion or belief | | | | ✓ |
| Sex (gender) | | | ✓ | |
| Sexual orientation | ✓ | | | |

Question 4:

Where there is a positive impact, describe the impact for each group sharing a protected characteristic. How many people are likely to be affected?

It is likely that the commissioning of services will occur in changing some distribution over time to localities or communities to whom need is greatest.

Question 5:

¹ The proposal has no impact (positive or negative) on any group sharing a protected characteristic.

² The proposal addresses an existing inequality experienced by the group sharing a protected characteristic (related to employment, provision of services or facilities).

³ The proposal disadvantages one or more of any group sharing a protected characteristic (related to employment, provision of services or facilities).

⁴ There is insufficient information available to identify which if any group sharing a protected characteristic will be affected by the proposal.

Where there is a negative impact, describe the adverse impact for each group sharing a protected characteristic. How many people are likely to be affected?

Services are targeted at children and young people 0-19. Therefore any service reduction will potentially impact on this age group. If alternative funding (e.g. after school services being funded through schools) is made available to many of the services identified then the numbers of users experiencing a negative impact will be small.

Some of the services included in the review are delivering within a particular neighbourhood. Many neighbourhoods have a particular profile that is specific to a single or few neighbourhoods. It is proposed that funding be withdrawn from after school services which are operating in many neighbourhoods across the city. Some of these will be delivered largely to children and young people from a particular ethnic group. Overall it is not expected that the withdrawal of afterschool provision across the city will impact on one ethnic group more than any other. It is important to remember that some needs are more prominent in certain communities and therefore it is appropriate that resources are targeted accordingly.

With the exclusion of after school services, two services where it is proposed that funding be withdrawn are operating in a specific area of the City only. One of these is based in Belgrave and one in Highfields. Due to the ethnic profile of these neighbourhoods, it is likely that the withdrawal of funding to these services will impact on Asian and Black Caribbean populations more than other ethnic groups. The numbers of people accessing these services are relatively low however with 20 at any one time for the Belgrave service and 10 children per session, with 10 sessions each week in the Highfields service.

Two services in the review are identified as being delivered to specific ethnic groups. One service is targeted at mixed heritage children and young people and it is proposed that this service have its funding withdrawn. The potential loss of this service could have a negative impact on mixed heritage children in the City although it is expected that other City services will offer support to this group.

The other ethnic specific service is targeted at black Caribbean and mixed heritage young people. This is an after school service where it is proposed that Council funding be withdrawn and potential alternative funding identified. The potential loss of this service could have a negative impact on the ethnic group using this service although as outlined above, it is not expected that the withdrawal of afterschool provision across the city overall will impact on one

ethnic group more than any other. User data would be needed to check this assumption.

The majority of services in the review are available to children and young people of both genders. One service is identified as being available to girls only and two are identified as being offered through women's centres. The information held about the two services offered through women's centres would suggest that they are offering services to children of both genders and that parents of both genders could potentially benefit from this.

The service offered to girls only is identified for a proposed loss of funding. Alternative funding opportunities are recommended and work will take place with this organisation to support them in accessing this where possible. However, if this alternative funding is not secured, there is the potential for a negative impact on girls as a result of a loss of this service. This service currently delivers to around 19 girls at any one time.

How can the negative impact for each group sharing a protected characteristic be reduced or removed?

The impact on age is unavoidable through this review but will be monitored as further recommendations are made. Support to ensure vulnerable families and individuals can access alternative provision will be available where needed.

The potential impact on ethnic groups following the proposal to withdraw funding from services based in Belgrave and Highfields will be minimised by working with those services to identify alternative provision that the current users can access.

It is hoped that the impact of the withdrawal of funding from all after school services, including the service delivering to a specific ethnic group and the service delivering to a specific gender group, can be negated by supporting services to access alternative funding.

Question 6:

Which relevant stakeholders were involved in proposing the actions recommended for reducing or removing adverse impacts arising from the proposal?

The Substantive post holder for Head of Service for Early Prevention was involved in putting the initial EIA together. This post is responsible for provision through Children's Centre's in the City.

What data/information/analysis have you used to inform your equality impact findings?

The EIA is largely informed by information submitted by the services as part of the supply mapping process that was undertaken early in 2011.

Data on the people using these services broken down into the equality strands was provided by some services. However, as many of these services have now been broken down further into several activities, each with a different outcome, it is not possible to identify the immediate impact on users with accuracy. Instead, services will be invited to comment upon further impacts on their users as part of the representation period.

Information about the services themselves is available through the supply map. Where they are identifiable as gender, ethnicity, disability or sexual orientation specific, this has been used in the EIA. Information about services operating in specific neighbourhoods is also available from the supply map and has informed the EIA.

Information about the profile of staff employed by the services is not currently available and services themselves will be invited to comment on any impact as part of the representation period.

Supplementary information

Question 1:

Is there other alternative or comparable provision available in the city? Who provides it and where is it provided?

For the majority of services identified for the withdrawal of funding, alternative funding streams may be available e.g. potential funding from schools extended services/pupil premium funds (est. £6.2m) or parental fees. These services may therefore continue to be available for children, young people and families to use.

For the remaining services identified for the withdrawal of funding, there will be a range of universal and targeted services available to their users that can support with meeting their needs. For example, children's centres offer a range of family support in each neighbourhood and would be able to provide additional support to families in need where a service is ending. Many of these services are already based in neighbourhoods and are familiar with delivery to specific groups.

It should be recognised however that some provision will be ending if proposals are approved and that no alternative service will be offered as the activity is not identified as being needed in Leicester through the core offer. Key considerations in making an assessment of whether an alternative service should be offered are the level of risk a family or young person faces as a result of loss of service and the level of negative impact on any particular groups.

Can this alternative or comparable provision help reduce or remove the negative impacts identified in Step 1, Question 5? If not, why not?

In many cases the alternative provision will be able to reduce or remove the negative impacts. However, in a few cases there may still be a loss of service e.g. if an afterschool club could not secure alternative funding then after school provision in that area of the City or for that population may cease. It is recommended that this be monitored as work progresses so that the final outcome for services and their users can be tracked.

Would service users negatively affected by the proposal be eligible to use this alternative or comparable provision? Would it meet their identified needs?

It is important to remember that this commissioning review seeks to ensure resources are distributed to meet areas of greatest need in the most effective way possible.

An assessment of the services users' needs would be needed to ascertain whether they

would be eligible to access alternative provision although all neighbourhoods have some universal provision that all children and young people could access.

Where children, young people or families are identified as vulnerable, alternative provision would be made available.

Question 2:

Will any particular area of the city be more affected by the proposal than other parts of the city? What area and why?

As outlined previously, afterschool provision is identified for a withdrawal of funding. These services are neighbourhood based but are operating in many areas of the City and could therefore be viewed as citywide provision overall.

Aside from the afterschool services, two neighbourhood based services are facing proposed funding withdrawal, one in Belgrave, the other in Highfields.

Question 3:

Is it likely that there may be other sources of negative impacts affecting service users over the next three years that need to be considered? Describe any additional negative impacts over time that could realistically occur.

This version of the EIA is carried out on only the first stage of proposed changes to the services. It is anticipated that further changes to services will arise as a result of awarding funding allocations and specifying the service requirements. It is not known at this stage whether this will bring about any negative impacts but the EIA will be reviewed when this information is available.

It is possible that longer term negative outcomes could be experienced by children, young people or families no longer receiving a service. However, steps identified under question 6

should ensure that alternative provision is available to those at greatest risk of poor outcomes.

Question 4:

Will staff providing the service be affected by the proposal/proposed changes? If yes, which posts and in what way?

Yes. Staff in services where funding withdrawal is proposed may face redeployment or redundancy. Staff in services where it is proposed that the Children's Centres deliver the majority of the intervention into the future face potential TUPE transfer or redeployment or redundancy.

A detailed assessment of posts will occur in cases where it is thought that TUPE may apply. Services are invited to send in details of impact on staff during the representation period. Further detail on staffing structures is not held by the authority at this point in time.

Date completed March 2012

Step 2: Consultation on the proposal

Question1:

What consultation on the final proposal has taken place?

When, where and who with?

A six week representation period has taken place with views specifically being sought from providers in scope of the review, schools, unions, elected members and existing neighbourhood advisory boards.

The representation period consisted of briefings for all of the above groups with a second follow up briefing for in scope services. A detailed information pack was also provided

explaining the methodology that is proposed for decision making and the impact that this has on services.

Finally, information was available on the review website and an on-line questionnaire as well as a paper version was available for people to complete.

The following responses were received:

- 69 Questionnaires: Online (52); Posted (11); Emailed (6)
- 18 letters: Trade Unions(2); CYP Council (1); Parents (15)
- 4 reports
- One petition from parents and community members regarding an after school club

Question 2:

What potential impacts did consultation stakeholders identify?

A range of impacts were identified with four services providing an EIA or equality data for their organisation if the changes were to be approved.

Overall impacts reported can broadly be broken down into the following groups:

- Impacts on organisations e.g. the loss of staff through redundancy, the loss of expertise in the City, the loss of high profile organisations etc.
- Impacts on the users of services and target populations e.g. vulnerable service users, families experiencing safeguarding issues, low income families in work etc.
- Impacts on outcomes for the City overall e.g. increase in child poverty, increase in safeguarding referrals etc.
- Impacts on the sector overall e.g. the impact on the VCS of changes to the market, impact on the female workforce etc.

Four services provided an EIA for the potential change. Two services have identified a negative impact white British young people, one also highlighting males as receiving the greater impact. Three services suggesting that families dealing with disability issues will be impacted and two highlighted issues of age.

However, all four services are proposed for continuation of delivery with this occurring through the existing Children's Centres. This transfer (if approved) would occur with the minimum of disruption to service users and would involve the assessment of TUPE rights for staff. The services have approached the EIA from the perspective of the service not

continuing which would not be the case.

A further service which currently provides an after school club and nursery has also provided some equality data on impact if the service were to end. This highlights a negative impact on women from the Indian community. However, alternative nursery funding sources are available to support the continuation of the nursery provision in a different form. Support to access schools funding will be provided by the authority but there is a risk of a negative impact occurring in this case.

It should be noted that this is the second occasion that services in scope have been approached with a request for details of the profile of users and/or the impact of the proposals in terms of equality issues. The first data set was limited and was gathered over 18 months ago hence the request for more accurate and up to date equality impact data during the representation period. However, given the low response rate to this request, it may be helpful to consider any other data held by the review team.

On the first occasion, the response rate for 0-12 services was around 10% in terms of data relating to equality issues. It should also be noted that the data is now 18 months old and for many services, a different group of users will now be accessing provision. However, three of the services proposed for funding withdrawal did submit some information on current users. This shows that two of the three services delivered to slightly more male than female users, one service delivered to predominantly white British and Asian young people on a roughly equal split, one service delivered to predominantly Pakistani and European users on a roughly equal split and one service delivered to predominantly white British users. No other equality based data was collected at this point. One recent monitoring return for one of the above services supports this user profile and adds that 10 out of 18 of their users this year had a disability.

Some services experiencing multiple impacts (see page 92 of report to scrutiny) did supply data but as only part of the service is due to experience change, it is felt that too many assumptions would need to be made in order to ascertain impact and that this would be an unreliable assessment as a result. Only one of these services submitted data on equality impact as requested during the representation period (details outlined above).

For the 13-19 group of services, the response rate for ethnicity data was around 83%. No data was collected on gender for these services and no data was collected on other protected characteristics at this point. No services from the 0-19 group that submitted

relevant data are proposed for withdrawal of funding and this data cannot therefore be used to guide an EIA on the proposals.

It should be noted that although one monitoring return was available for one of the services experiencing a funding withdrawal, no other monitoring returns included data on equality strands.

What positive equality impacts were identified? For people with which protected characteristics?

No positive impacts were identified through the representation period although some respondents welcomed the use of a commissioning approach to guide spend.

What negative equality impacts were identified? For people with which protected characteristics?

A few services talked about the negative impacts on particular user groups either currently accessing or potentially accessing their services. This included groups such as disabled children, women, LGBT users of services etc. This point was usually made by services where it was proposed that funding should be withdrawn where all users of the current service face the potential loss of that service. This includes the 4 services that submitted an EIA. However, specific data to evidence these statements was only submitted by 5 services, this is covered in question 2 above. A lack of data regarding numbers of people affected and the reasons why they would be affected makes it difficult to assess the impact and ways in which impacts could be mitigated.

The 5 services that did submit data and information held on the team for three services show an impact to several ethnic groups, an impact on people with disabilities and an impact to male service users.

Comments were received in relation to the impact the proposals may have on women. It is assumed that this point relates to both female staff in services as well as mothers who are often one of the key beneficiaries of services to children and young people. Very few services have provided details on the make-up of their workforce or their user base so it is not possible to validate this point. However, it would seem likely that this would be the case to some extent.

Question 3:

Did stakeholders indicate how positive impacts could be further promoted? How?

No specific comments addressing this point were made.

Did stakeholders indicate how negative impacts could be reduced or removed? How?

Many services suggested that changes proposed should not be approved. The main reasons for this were issues around impact in terms of job losses, loss of key organisations and loss of service for vulnerable children, young people and families. No alternative methodologies for decision making were proposed.

Several requests to commission services for LGBT young people centrally were received as there was concern that this issue may not be addressed effectively or anonymously on a neighbourhood basis. This proposed change has gone forward as a recommendation.

A request to consider the needs of disabled children and young people when designing services was received. This is something that has been considered already and will continue to be considered as the review moves into the stages of drawing up service specifications and setting quality standards.

Date completed 16th July 2012

Step 3: The recommendation (the recommended decision on how to change the service)

Question 1:

Has your recommended proposal changed from the proposal in Step 1 as a result of consultation and further consideration?

Yes

No

If yes, describe the proposal and how it will affect current service users?

Changes to the original proposal include:

- Provision of a safe supervised space intervention 58 is now proposed for mixed provider type and mixed commissioning model
- 7 services are proposed for re-matching to alternative interventions including Home Start which is now proposed for matching to intervention 67.
- The commissioning of support for LGBT young people and counselling services for young people are proposed to move to a city-wide commissioning level.

Users of the youth service will experience very little change as a result of the proposal to move this to a mixed provider and commissioning model. Further changes may emerge as the review progresses but at this stage no changes are proposed.

No significant change for the services now matched to revised sets of interventions is anticipated other than in the case of Home Start. Home Start is now proposed for matching to intervention 67 which is due to be provided largely within the Children's Centres. This is likely to mean the withdrawal of funding for Home Start Leicester whilst similar services would be provided through the Children's Centres.

This will mean a potential change for users of the service who may experience a change in staff delivering a service to them.

The proposed change to commissioning of LGBT and counselling services will mean that current city-wide commissioning arrangements will continue. Changes may occur at a later stage in the review but none are proposed at this point.

What are the equality implications of these changes? Identify the likely positive and negative impacts of the final proposal and the protected characteristic affected.

Users of services for LGBT young people are likely to experience a neutral impact following the representation period as no changes are proposed to this service now at this stage in the review. This change has been brought about as a result of representation made and identification of a previously unrecognised potentially negative impact on a protected characteristic group.

How can any negative impacts be reduced or removed?

Not applicable beyond those identified in the first section of this EIA.

Question 2:


Are there any actions⁵ required as a result of this EIA?

Yes

No

Date completed 16.07.12

Step 4: Sign-off

| This EIA completed by | Name | Signature | Date |
|---|----------------|--|-------------------------------|
| Lead officer | | | |
| Countersigned by Equalities Officer | Sonya King |  | 16 th July 2012 |
| Countersigned by Finance Officer | | | |
| Signed off by Divisional Director | Trevor Pringle |  | 27 July 2012 |

⁵ Actions could include improving equality information collected or identifying the actions required to mitigate adverse impacts identified in the EIA.