

Rugby Borough Council

Housing Services

Anti Social Behaviour Policy

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## 1. Introduction

Rugby Borough Council (RBC) Housing Services recognise that by providing a strong housing management service a real difference can be made to the quality of lives of local residents. We aim to work within the framework of our Anti Social Behaviour Strategy for 2010-2013.

## 2. Definition of Anti-Social Behaviour

Rugby Borough Council uses the following definition of anti-social behaviour based on the Crime and Disorder Act 1998.

***‘Behaviour which causes or is likely to cause harassment, alarm or distress to one or more people who are not in the same household as the perpetrator’***

The Anti Social Behaviour Act 2003 clarifies further for landlords of social-housing, giving us power to challenge any person on our estates that is causing nuisance and annoyance:

***‘any conduct which is capable of causing nuisance and annoyance to any person and which directly or indirectly relates to the housing management functions of a relevant landlord’***

The Act also allows us to more effectively manage our properties by giving us authority to tackle the behaviour of those living and visiting those living in our homes – tenant or not:

***‘Any conduct which consists or involves using or threatening to use housing accommodation owned or managed by a relevant landlord for an unlawful purpose’***

We recognise that failure to effectively tackle anti social behaviour could:

- Substantially affect the lives of those individuals who are living with nuisance or anti social behaviour;
- Impact on the local environment and culture of an area which in turn could damage our ability to develop sustainable communities.

## 3. Key Objectives

We will thoroughly investigate all complaints of anti social behaviour and neighbour nuisance. We will do this by:

1. Taking appropriate and proportionate action against those perpetrators of nuisance or anti social behaviour whether it is being caused by them, their visitors and/or their family.
2. Providing as much support as possible to complainants and/or witnesses of anti social behaviour. We will also support any perpetrator of anti social behaviour who is

vulnerable by referring them to specialist support agencies, recognising that it is possible to change poor behaviour to the point where it becomes acceptable.

3. Recognising that prevention is better than cure. By adopting a multi-agency approach in tackling anti social behaviour, encouraging the use of an independent mediation service and promoting early intervention, we aim to resolve the majority of anti social behaviour complaints through voluntary means.
4. We will closely monitor the quality of the service that we provide by sending all complainants a customer satisfaction survey when their case is closed.

The term 'anti social behaviour' includes a wide variety of behaviour that can blight the quality of community life. However, we do not classify as anti social behaviour everything that is reported to us. For example:

- People mowing their lawns
- People vacuuming
- People walking across a wooden floor whilst wearing shoes
- People using washing machines
- Children falling out with each other
- Cooking smells
- Noise of a child playing in their own home
- Children playing outside
- Children playing ball games

We do not fit 'no ball games' signs as they are not enforceable. Children playing ball games is not considered anti-social behaviour unless they are engaged in more serious nuisance such as verbal abuse or criminal damage. Where problems are identified we will address the situation using positive diversionary activities to encourage young people to recognise the impact of their actions and to play elsewhere.

The above examples are illustrations only and are not exhaustive. They are everyday living noises or minor lifestyle differences rather than anti social behaviour. They will not be routinely investigated as anti social behaviour under the terms of this policy. However, in exceptional circumstances we should be contacted for clarification and further advice.

Although people who live in houses and flats can expect to hear a certain amount of noise from their neighbours, they are not expected to endure unreasonable levels of noise nuisance. Anyone in any doubt should contact us for advice and assistance.

5. Rugby Borough Council will take positive and decisive action to deal with cases of behaviour that are detrimental to our residents' right to the "peaceful enjoyment of their homes". Rugby is clear in its aims that anti social behaviour and harassment are unacceptable and that effective and early action will be taken in tackling these. This action will involve a range of preventative, management and legal measures.

It is important that the Council employs a comprehensive range of both legal and management tools in seeking to combat or resolve nuisance and anti social behaviour.

The Council will address complaints of anti social behaviour by:

- Investigating all alleged incidents including same for anonymous and uncorroborated incidents.
- Working in partnership with residents, the Police, Community Safety Wardens and specialist support Services.
- Taking reasonable and proportionate action against perpetrator(s).

#### **4. How to Report an Incident of Anti Social Behaviour**

If our tenants and residents are suffering from any kind of anti social behaviour they should be encouraged to report the problem as soon as possible.

Complaints can be made in the following ways:

- Telephone our contact centre on 01788 533533
- Write to us at: Rugby Borough Council, Town Hall, Rugby. CV21 2RR
- Email us at: [contactcentre@rugby.gov.uk](mailto:contactcentre@rugby.gov.uk)
- Go online at: [www.rugby.gov.uk](http://www.rugby.gov.uk)
- Contact the Community Safety Wardens on: 0800 096 8800 (3pm – 11pm 7 days a week)
- Via a third party such as the Police.

#### **5. The Responsibility of Complainants**

When we receive a report of anti social behaviour or neighbour nuisance we will, as part of our investigation, always try to contact the complainant to find out as much information as we can.

It is important therefore that all complainants recognise the importance of working with us to resolve their complaint. They should do this by responding to our calls and/or letters, collecting information on the nuisance and to be available for pre-arranged meetings or home visits.

Failure to do so may lead to the case being closed due to lack of contact with the complainant.

If a case warrants it, we may request that complainants and/or witnesses provide us with a statement and attend court. It is important therefore that all complainants understand that this may be a course of action pursued as a means of resolving the nuisance.

All complainants have a responsibility not to make malicious complaints about their neighbours, visitors or anyone engaged in lawful activity around their property. We take malicious complaining very seriously and will take action against anyone found to be doing so.

Anonymous complaints will be accepted and recorded. Staff will endeavour to use discretion and judgement in deciding whether anonymous information warrants further investigation.

## **6. The Responsibility of the Wider Community**

Although all reports of nuisance and anti social behaviour will be thoroughly investigated, the wider community has a responsibility to not engage in nuisance and anti social behaviour and to report it where seen.

## **7. The Responsibility of Tenants and Leaseholders**

Tenants and leaseholders are responsible for abiding by the terms and conditions of their tenancy or lease agreement. Copies of these are issued to the tenant or leaseholder at the start of their tenancy/lease. Further copies can be requested from the housing team.

## **8. Working in Partnership**

Partnership working is crucial if we are to prevent anti social behaviour and tackle it quickly and effectively.

Our partner agencies include (although this list is not exhaustive);

- Police
- Victim Support
- Community Safety Partnership
- Floating Support Services
- Social Care
- Probation Service
- Youth Justice Service
- Positive Futures
- Environmental Services
- Community Safety Wardens
- Warwickshire Race Equality Partnership
- Mediation and Community Support
- Other Support Services

The following are not partner agencies but specific arrangements have been made with them for consultation and information sharing as necessary:

- Crown Prosecution Service
- Warwickshire Magistrates Court Service
- Coventry County Court

Together with our partner agencies, we have also signed up to the Warwickshire Information Sharing Protocol that enables us all to share appropriate and relevant

information when dealing with cases of anti-social behaviour. All information is shared in line with the protocol and within the terms of the Data Protection Act 1998 and the Crime and Disorder Act 1998.

We attend and contribute to the Community Safety Partnership (CSP), Rugby Tasking and Co-ordination Group and Rugby ASB Tactical Group, which are multi-agency forums aimed at strategically planning and targeting resources more appropriately in tackling anti social behaviour across the Borough.

The various strategic and tactical groups aim to reduce the barriers between agencies to ensure anti social behaviour is tackled effectively across the whole of the Borough. We will therefore exchange information regarding names, addresses, dates of birth of alleged perpetrators and details of nuisance at these meetings and agree the most appropriate way forward.

We will also keep appropriate groups updated on any actions that we are taking.

## **9. Housing Services - Our Approach to Tackling ASB**

We will work with the Environmental Protection Team and Community Safety Wardens in cases where both complainant and alleged perpetrator are an owner-occupier or a private tenant within our housing estates.

We will always seek to resolve a complaint at the lowest possible level. It is recognised that in most instances of minor dispute this will involve the complainant being advised to raise the issue tactfully with the individual concerned. In most instances this can resolve matters without escalation.

We will not move complainants or perpetrators as a means of resolving nuisance or anti social behaviour (except in exceptional circumstances); we will deal with the nuisance.

We want to create a climate where people feel confident in coming forward with information. All action will be agreed with complainants, prior to any action being taken and we will provide complainants with a regular update on the progress of their case at least every two weeks. This will commence from the point of complaint and continue until resolution and beyond if appropriate.

When a case reaches the court hearing stage, in addition to witness statements, we may use noise recording equipment, CCTV and/or professional witnesses where a situation warrants it.

We will work closely with our partner agencies to try and prevent nuisance and anti social behaviour from occurring.

We will, where possible, make environmental improvements, such as improving lighting and removing graffiti where necessary.

## **10. Support for Vulnerable Tenants**

In recognising the importance of supporting vulnerable tenants, we will refer anyone who we know or who we suspect has a vulnerability to a specialist support service, providing that the individual is willing to receive this support. This is regardless of whether they are the alleged perpetrator or the complainant.

When a complaint of anti social behaviour is made against someone who we know or suspect is vulnerable, we will try to change or modify their behaviour by linking in with the support services. However, we will also make it clear that any failure to engage with this service may lead to legal action being taken against them to enforce their tenancy conditions.

## **11. Witness Support**

When we are preparing to take action against someone for anti social behaviour, we understand that it may be a frightening and distressing time for some of our witnesses. We will therefore do all that we can to make this process as easy as possible.

Where there is a real threat of violence or an attempt on the life of a witness giving evidence, we would deal with cases like this under the Homelessness legislation.

If a threat of violence has been made against a witness giving evidence, but it is not considered life threatening, the case will be considered as a special needs re-housing case in line with our allocation policy document.

Where a threat is received by a witness who is giving evidence we will help to secure your property (this will include advice from the Police and Victim Support).

Steps that we can take to help secure a property can include fitting:

- Additional window locks
- Movement sensitive lighting
- Letterbox covers
- Smoke alarms
- Installation of a CCTV camera
- Environmental work around the property
- 24-hour panic alarm

## **12. Witnesses in Court**

Where witnesses are required to give evidence in court we will provide a full explanation of what people should expect and offer a pre-court visit in advance of the hearing (where possible).

Witnesses can expect to receive the following support throughout court hearings:



- Transport to and from the court;
- A separate waiting room for our witnesses (where possible);
- An escort during the hearing (this will usually be the officer who has been managing the case);
- Compensation for loss of earnings;
- Refreshments and lunch through the hearing.

In all cases that have been resolved following a court hearing, officers will continue to support witnesses for a period of time afterwards. The length of time required will vary for each case and it will be agreed with witnesses on an individual basis.

Witnesses who give evidence can receive advice from the Victim Support who runs the Witness Service in every criminal court in England and Wales to give information and support to the witness and their families in court.

### **13. Hate Crimes and Incidents (Racist Harassment, Homophobia, Sexual Harassment, etc)**

Complaints of this nature are classified as very serious.

As with a racist incident, we define a hate crime or incident as an incident that is perceived to be such by the victim or any other person. Examples of a hate crime or incident could be because of someone's religion, gender, sexuality, mental health, learning or physical disability or cultural difference. Having HIV or AIDS is also defined similarly.

Where a racist or hate crime incident has been reported to us, we cannot take any enforcement action without evidence.

All complainants and witnesses in these cases will be dealt with in a sensitive, supportive and understanding way and we will provide supportive measures as described in the Witness Support and Witnesses in Court sections of this policy.

We will also offer to refer complainants and witnesses to an appropriate support agency who will be able to provide them with additional support, such as the Warwickshire Race Equalities Partnership (WREP), Community Protection Team and Warwickshire Police Hate Crime Help Line: 0845 129 2221.

If the property where the victim/witness lives has been the subject of vandalism or graffiti we will deal with this as a matter of urgency. Our target for removing abusive, racist or homophobic graffiti is 24 hours.

### **14. Closing Cases**

We will close cases where the situation has been resolved and the complainant is happy for us to do so.

In certain circumstances we will close cases even if the complainant does not want us to. If we are satisfied that we have done everything we can, that is reasonable and proportionate to resolve the complaint. We will record the reasons for closing cases and advise people about what they can do next.

We will not assume that a situation has improved if we have not heard from the complainant in a while. We will try and make contact with them before passing a case for closure. We will do this by writing to them, telephoning and/or conducting a home visit. Only when all these have failed will a case be passed for closure on the grounds of no contact. We will also close a case where the complainant has failed to respond to our requests for information.

## **15. Performance Monitoring**

We closely monitor the quality of the service that we provide by carrying out customer satisfaction surveys when we close cases. We will randomly review 10% cases that have been passed for closure to check that the complainant is happy for us to do so.

Levels of customer satisfaction will be monitored. Any customer satisfaction survey indicating a negative response will be followed up by the Team Leader within 28 days of receipt. The Team Leader will talk to both the complainant and the officer who managed the case to establish whether everything that could have been done to resolve the complaint has been.

The Team Leader will confirm the outcome of the review in writing to the complainant advising them whether the case will be reopened for further investigation or not.

## **16. Links to Other Policies**

This policy does not work in isolation. Other RBC policies that support or influence this policy include;

### **Allocations**

Where we have evicted a tenant/s for anti social behaviour, we will try to sensitively re-let the subsequent vacant property, understanding that the surrounding community have probably experienced significant anti-social behaviour and neighbour nuisance.

It is recognised that we cannot offer any guarantees that a new tenant would not cause problems.

Perpetrators of anti social behaviour who have had a court order awarded against them for anti social behaviour may be given a reduced priority for housing. As a minimum, this will apply to all perpetrators who have been given an Anti Social Behaviour Order (ASBO), an Anti Social Behaviour Injunction (ASBI), a Suspended or Postponed Possession Order, a Possession Order or a Demoted Tenancy.

The majority of people who are offered a property with RBC will be introductory tenants for their first year. They will have less security of tenure and rights than a secure tenant. We

will clearly explain the terms of the introductory tenancy agreement to all new tenants when they sign their introductory tenancy agreement, drawing particular attention to the clauses surrounding neighbour nuisance and anti social behaviour. If incidents of anti social behaviour occur during their first year, the action to take possession of the property through the County Court can be taken more quickly. After a year their tenancy automatically becomes secure.

All new tenants will receive a settling in visit within four weeks of their new tenancy start date. The purpose of this visit will be to check that they have settled in to their new home and raise any problems that may have come to light in the first four weeks, such as nuisance and antisocial behaviour. Introductory tenants are also visited again after the first six months of their tenancy to review their tenancy conditions.

## **Homelessness**

Where legal action is being taken against a tenant for anti social behaviour, which may result in them becoming homeless, we will conduct a joint visit with an officer from our Housing Options Team.

Where anti social behaviour is being investigated and either the complainant or the alleged perpetrator makes a homeless application, we will share all our information with the Housing Options Team so that they can make a decision on someone's eligibility for assistance under homelessness legislation.

## **Domestic Abuse**

Where a complaint is received regarding neighbour nuisance or anti social behaviour, we will deal with it as outlined within this policy. However, where we suspect that the cause of the nuisance is domestic abuse, we will refer to our Domestic Abuse Policy.

## **Vulnerable Persons**

Where a complaint is received regarding neighbour nuisance or anti social behaviour, we will deal with it as outlined within this policy. However, where we suspect that the perpetrator of the nuisance is vulnerable, we will refer to our Vulnerable Persons Policy.

## **Race Equality Scheme**

RBC is committed to ensuring that race equality is part of everything we do. The Council is committed to upholding four key principles through which we aim to;

- Achieve improvement for all but with the fastest improvement for the most deprived;
- Ensure equality of opportunity for all;
- Be a customer focused organisation;
- Take into account the needs of future generations in our planning.

In respect of race equality, RBC has sought to promote the above objectives and principles of the Equality Standard for Local Government.

## **17. Confidentiality and Data Protection**

We respect the rights of our customers to confidentiality and will always request their permission before sharing any information they give us with others.

We will comply fully with the requirements of any new or existing relevant legislation, such as the Data Protection Act 1998.

## **18. Publicising Success**

Publicity is essential if local communities are to support us when tackling anti-social behaviour. Where applicable, we will publicise successful results of both legal and voluntary actions that we have taken in the Tenant Times newsletter and at times, the local media.

When we obtain an Anti Social Behaviour Order (ASBO) or Anti Social Behaviour Injunction (ASBI) in Court we will produce information for all relevant parties in line with RBC's publicity protocol. This will include details of the name and age of the perpetrator, together with a list of the prohibitions and the expiry date of the Order. It will also contain details of who to contact should the Order be breached.

This information can only be published providing the Court Judge has not imposed any reporting restrictions on the case being heard.

We will also, from time to time, publish a statistical summary showing the numbers of cases, actions, resolutions and court results to our tenants and partner agencies through a variety of means (e.g., Community Safety Partnership meetings, Rugby and District Tenants Association meetings, Tenants Times newsletter).

## **19. Protection of Staff**

We will not tolerate any threats of abusive behaviour towards our staff. We will take strong action if this condition is breached including legal action which could result in an injunction, possession proceedings or both.

## **20. Staff Training**

Tackling anti social behaviour effectively requires knowledgeable and well-trained staff. We will ensure that all staff dealing with anti social behaviour clearly understand and deliver our policy.

## **21. Legal Framework**

We are required to be conversant with and take account of legislation relating to management of local authority housing and anti social behaviour. Housing Teams are required to have an understanding of legislation relevant to the tasks they are performing

and a commitment to its implementation. We shall be aware of all proposals to amend new legislation, which have a bearing on the services they deliver.

Examples of legislation that Housing Teams need to be aware of include:

#### The Crime and Disorder Act 1998

The Crime and Disorder Act came into force in September 1998. It places a duty on local authorities and the police to form a partnership and develop with key partners to tackle crime and disorder.

RBC Housing Services fully supports the use of Acceptable Behaviour Contracts (ABC's) as a method of preventing young people entering the justice system.

Under Section 17 there is a duty for each authority to exercise its various functions with due regard to the likely effect of the exercise of those functions on, and the need to do all that it reasonably can to prevent, crime and disorder in its area. Under this Act RBC can apply for an Anti Social Behaviour Order (ASBO) as a means for combating serious anti social behaviour.

#### Human Rights Act 1998

Under this Act a victim is suffering an abuse of one of the human rights will be entitled to complain to a court of law in the United Kingdom and seek compensation.

Key rights that are significant for RBC are:

1. Prohibition of discrimination;
2. Respect for private and family life;
3. Right to a fair and public hearing.

#### Homelessness Act 2002

The Homelessness Act places a duty on the Council and its statutory partners to work together to prevent homelessness and to help to sustain vulnerable people, in particular, in their tenancies. Where a household's tenancy is put at risk as a result of anti social behaviour carried out by a tenant or someone in their household or a visitor, then demonstrable steps must be taken to show that all other options have been pursued before a Possession Order is sought.

Housing Teams will be responsible for ensuring that colleagues in the Housing Options Team are kept informed not only of cases where court action is being planned but also of the preventative steps that are being pursued. This level of co-operation is required if the Council is to successfully defend any future decision not to offer alternative accommodation either through Part 7 (Homelessness) application or an application to join the housing register from a previous tenant evicted for anti social behaviour.

#### Data Protection Act 1998

All personal data processed by RBC must be:

1. Obtained and processed fairly and lawfully;
2. Kept accurate and up to date;
3. Held for no longer than is necessary;
4. Subject to appropriate security measures.

#### Housing Act 1985 and 1996

The Housing Act provides a sanction on perpetrators of nuisance and anti social behaviour whether they are tenants or other persons who are affecting those lawfully in the area of the housing authority. Eviction for harassment and anti social behaviour can be achieved under two different grounds in schedule 2 of the 1985 Act: Ground 1 covers breaches of tenancy agreement and Ground 2 is specifically for nuisance or annoyance and/or certain convictions.

The Housing Act 1996 Section 144 amends the Housing Act 1985 Ground 2 and extends the scope so local authorities can give evidence of behaviour that justifies repossessing a tenancy. The Housing Act gives social landlords more powers against anti social tenants by strengthening the grounds for possession to include:

1. Behaviour likely to cause nuisance (which enables professional witnesses to be used)
2. Anti social behaviour in the locality of the tenant's property
3. Anti social behaviour of visitors to the property
4. Conviction for an arrestable offence in the vicinity of the property

#### Environmental Protection Act 1990 and the Statutory Nuisance Act 1993

Under these acts if the Councils Environmental Protection Team considers that a noise amounts to a statutory nuisance they can serve an abatement notice. If the nuisance continues without reasonable excuse, the noisemaker can be prosecuted in the Magistrate's Court and if convicted, can be fined up to £5000, with a further £500 for each day on which the nuisance continues. Environmental Protection Officers can obtain a warrant from the Magistrate's Court and can seize equipment. Housing Services will take appropriate action on a council tenant if a noise abatement notice is served by the RBC Environmental Protection Team, this may include a Notice Seeking Possession or Notice of Demotion being served.

#### The Anti-Social Behaviour Act 2003

The housing provisions of the Act came into force on 30<sup>th</sup> June 2004, it introduced the following:

##### 1. Section 12

A requirement for social landlords to publish policies and procedures on how they deal with anti social behaviour by 30<sup>th</sup> December 2004.

##### 2. Housing Injunctions

These enable social landlords to apply to the court for housing injunctions to prevent behaviour capable of causing nuisance and annoyance which indirectly or directly affects their housing management functions. This will make it easier to exclude perpetrators from

the areas where they have been causing trouble; wider categories of people can be protected; and a power of arrest or an exclusion order will be available where there has been anti social behaviour but no violence or threat of violence; this could include emotional or psychological harm.

### 3. Sections 14 and 15 Demotion Orders

If a tenant behaves anti socially or allows a member of their household or visitors to do so, using the sections 14 and 15, a social landlord can apply to the court for a demotion order ending the tenant's existing tenancy and replacing it with a less secure demoted tenancy. This removes the tenant's Right to buy and security of tenure for at least a year. At the end of the year if the landlord has been satisfied by the tenant's conduct of the tenancy it reverts back to a secure tenancy. If there are continuing problems, a social landlord can extend this period by following a set of prescribed procedures.

### 4. Section 16

Requires courts to give particular consideration to the impact of anti social behaviour on victims, witnesses and the wider community in all nuisance-related housing possession cases.

ASBOs that can be brought on the back of possession proceedings against people who are not the tenant but reside with him or her.

### Clean Neighbourhoods and Environment Act 2005

The powers of this Act are designed to help local authorities deal quickly and effectively with those who litter, fly-tip and otherwise deface and damage the local environment. The measures in the Act support local authorities and their partners to create cleaner, safer and greener neighbourhoods.

### Equality Act 2010

The Equality Act 2010 came into force on 1 October 2010. The Act harmonises and, in some cases, extends existing discrimination law covering the 'protected characteristics' of age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation. The Act brings the protected characteristics within one piece of legislation, and also makes changes to the law.

## **22. Complaints and Compliments**

If you are pleased or dissatisfied with a service, complaints and compliments can be made directly to the team concerned, or you can:

- Telephone our contact centre on 01788 533533;
- Write to us at: Rugby Borough Council, Town Hall, Rugby. CV21 2RR;
- Email us at: [contactcentre@rugby.gov.uk](mailto:contactcentre@rugby.gov.uk)
- Go online at: [www.rugby.gov.uk](http://www.rugby.gov.uk)

## **23. Monitoring and Review of the Policy**

We will review this policy every year to ensure that any changes in best practice and Government legislation are incorporated.

We will ensure that our service is accessible to all and where customers have any particular needs or requirements we will do all we can to help. Examples of this are:

- All documentation is available in appropriate languages and formats upon requests (e.g., large font, audiotapes)
- All complainants and alleged perpetrators have access to an interpreter where applicable.

An Equality Impact Assessment on this policy was undertaken in April 2011 and will be reviewed in March 2014.