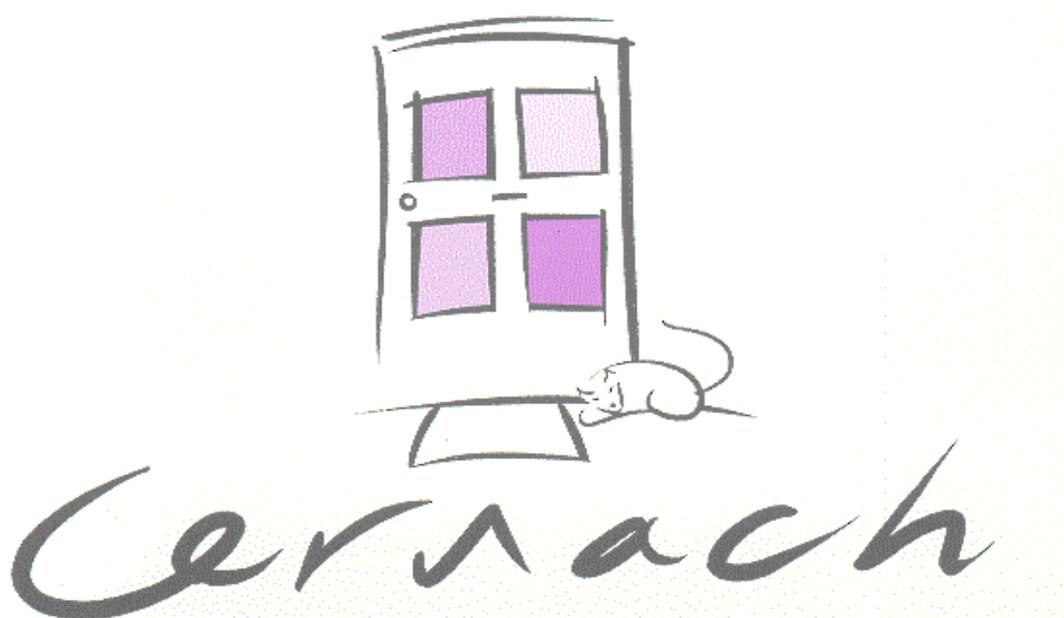


**CERNACH HOUSING ASSOCIATION
LIMITED**



**NEIGHBOUR DISPUTES &
ANTI SOCIAL BEHAVIOUR POLICY**

Date Approved by Operations Sub-Committee:

September 2022

Date Issued to Staff:

September 2022

Due for Review:

September 2025

**Cernach Housing Association
Neighbour Disputes & Anti Social Behaviour Policy(Cont'd)**



1. Introduction

- 1.1 Cernach Housing Association is committed to helping tenants to maintain the quiet enjoyment of their homes by operating a policy, which endeavours to prevent situations arising that might lead to neighbour complaints. We ask our tenants to show consideration and tolerance to their neighbours and act responsibly within their community.
- 1.2 It is the Association's aim to deal promptly and effectively with the complaints, which do arise, making full use of the available legal sanctions as necessary.
- 1.3 We are committed to tackling reports of anti-social behaviour effectively and recognise the importance of a multi-agency approach in delivering this service.
- 1.4 We apply the same principles to how our staff, contractors and agents are treated when carrying out their duties. While the overwhelming majority of contact is respectful, we will not tolerate behaviour by customers which is aggressive, abusing, threatening or discriminatory. We have an Unacceptable Behaviour Policy which describes how we will manage any such situations.
- 1.5 The Neighbour Disputes and Anti Social Behaviour Policy has clear links to the Racial Harassment Policy, Pet Policy and the Estate Management Policy.

2. Policy Aim and Objectives

- 2.1 A key aim of the Association is to provide quality, affordable homes within safe and attractive environments. This policy aims to set out the framework within which Cernach Housing Association will manage and investigate reports of anti-social and nuisance behaviour.
- 2.2 It will clearly define behaviour which would be categorised as anti-social and in breach of the tenancy agreement and outlines the way in which neighbour complaints and neighbour disputes should be dealt with.
- 2.3 Cernach Housing Association will not tolerate any level of neighbour nuisance or any form of anti-social behaviour affecting its tenants. The Association will communicate clearly what standards of behaviour are acceptable. Where necessary the Association will use the most robust measures available to it to stop anti social behaviour creating a balance between prevention and enforcement of the Tenancy Agreement.
- 2.4 To achieve this, the Association will develop joint working with Police Scotland, Glasgow City Council and other statutory and voluntary agencies and departments

Approved:

Cernach Housing Association Neighbour Disputes & Anti Social Behaviour Policy (Cont'd)

which might have a legal obligation or some other interest in specific cases or in preventative work. We will aim to share any information with these agencies where appropriate and permissible under Data Protection Law.

- 2.5 The Association will not become involved in disputes which are not related to tenancy conditions and we cannot act against people who are not our tenants. We will, however, offer advice and assistance and make referrals to agencies that can be of assistance where appropriate.
- 2.6 The Association will ensure that all tenants are treated equally, and no groups are discriminated against in relation to the operation of this policy.

3. Legislative & Regulatory Framework

3.1 This policy has been developed within a framework that ensures proper compliance with legislation, regulatory advice and good practice.

3.2 This policy adheres to the Housing (Scotland) 2014 Act. It also meets following legislative provisions relating to the policy:

- Misuse of Drugs Act 1971
- Human Rights Act 1988
- Dangerous Dogs Act 1991
- Crime and Disorder Act 1998
- Disability Discrimination Act 1998
- Housing (Scotland) Act 2001
- Race Relations Act 1976 (Amendment) Regulations 2003;
- Criminal Justice (Scotland) Act 2003
- Anti-Social Behaviour etc. (Scotland) 2004
- Housing (Scotland) Act 2010;
- Equality Act 2010
- The Scottish Secure Tenancy
- The Short Scottish Secure Tenancy

3.3 This policy has taken into account the requirements set out in the Scottish Social Housing Charter that became effective on 1 April 2012.

Outcome 6: Estate Management, anti-social behaviour, neighbour nuisance and tenancy disputes

Social landlords, working in partnership with other agencies, help to ensure that:

Cernach Housing Association Neighbour Disputes & Anti Social Behaviour Policy (Cont'd)

- *tenants and other customers live in well-maintained neighbourhoods where they feel safe.*

Outcome 11: Tenancy Sustainment

Social landlords ensure that:

- *tenants get the information they need on how to obtain support to remain in their home; and ensure suitable support is available, including services provided directly by the landlord and by other organisations*

4. Risk Management

- 4.1 The Association has considered the risks of failing to adhere to the policy when dealing with neighbour disputes and anti-social behaviour complaints. Failure to appropriately deal with incidents can impact the community's ability to enjoy living peacefully in their homes. This may lead to an increase in void properties as tenants and applicants opt to live out with the boundary of the Association's stock as well as having an adverse effect on the standard of the estate.

5. Equality and Human Rights

- 5.1 The Association's Equality and Human Rights policy, which was approved by the Committee in April 2021, outlines our commitment to promote a zero tolerance to unfair treatment or discrimination to any person or group of persons, particularly on the basis of any of the protected characteristics¹. This includes ensuring that everyone has equal access to information and services, and, to this end, the Association will make available a copy of this document in a range of alternative formats including large print, translated into another language or by data transferred to voice.
- 5.2 We are also aware of the potential for policies to inadvertently discriminate against an individual or group of individuals. To help tackle this and ensure that it does not occur, best practice suggests that organisations carry out Equality Impact Assessments to help identify any part of a policy that may be discriminatory so that this can be addressed (please see section 6 of the Equality and Human Rights policy for more information).
- 5.3 In line with section 6 of the Equality and Human Rights Policy, the Association carried out an Equality Impact Assessment on this policy and no remedial action

¹ The Equality Act 2010 identifies the "protected characteristics" as age, disability, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex, gender reassignment and sexual orientation.

Cernach Housing Association Neighbour Disputes & Anti Social Behaviour Policy (Cont'd)

was identified as necessary. The full assessment is appended at the end of this policy.

6. Responsibility & Delegated Authority

- 6.1 The Association's procedure for dealing with neighbour disputes will be governed by a separate internal procedure note.
- 6.2 The Housing Management Team have responsibility for implementing this policy on a day to day basis as delegated by the Senior Housing Officer. The Senior Housing Officer has responsibility for:
- Monitoring performance.
 - Monitoring the operation and implementation of the policy.
 - Key aspects of service delivery.
 - Review of this policy.
 - Reporting to the Operation Sub-Committee on any legal action taken or reduction of a Scottish Secure Tenancy to a Short Scottish Secure Tenancy.
- 6.3 Any reduction of a Scottish Secure Tenancy to a Short Scottish Secure Tenancy will be approved by the Director/Depute Director and reported to the Operations Sub-Committee.
- 6.4 The Depute Director retains overall responsibility for the implementation of this policy. The Operations Sub-Committee holds responsibility for the approval of this policy as delegated by the Management Committee.

7. Definition of Anti Social Behaviour

- 7.1 The Scottish Secure Tenancy Agreement defines anti-social behaviour as *“causing or likely to cause alarm, distress, nuisance or annoyance to any person or causing damage to anyone's property.”*
- 7.2 Section 143 of The Anti-Social Behaviour etc. (Scotland) Act states “conduct” would include speech, and “a course of conduct” must involve conduct on at least two occasions. The legislation provides that a person engages in anti-social behaviour if they: “act in a manner that causes or is likely to cause alarm or distress; or pursue a course of conduct that causes or is likely to cause alarm or distress to at least one person not of the same household as them”.

Cernach Housing Association Neighbour Disputes & Anti Social Behaviour Policy (Cont'd)

7.3 There are some instances and behaviours which do not constitute anti-social behaviour and there is very little action the Association can take to resolve these issues. In many instances, conflicts between residents arise out of a clash of lifestyles and expectations. Some examples of these types of disputes are listed below but is not exhaustive:-

- Incidents that involve noise from vehicles such as ice cream vans or taxis which should be reported to the Land and Environmental Services Unit at Glasgow City Council.
- Problems with behaviour of staff from other agencies, for example home helps.
- Door banging or people walking across wooden floors or going up and down stairs.
- Noise from washing machines/driers/vacuums/mowers between 9am-9pm
- Parking disputes/revving engines/music from cars/poor driving.
- Children playing or falling out/noise from games/throwing snowballs.
- Looking out of windows.
- Cooking smells.
- Disputes over reasonable use of common areas.

7.4 We also recognise that, in some circumstances, there may be limits on what the Association can do to resolve alleged anti-social behaviour. Examples include:

- There is no evidence or corroboration to support the claims.
- An investigation concludes that there was no evidence of anti-social behaviour or breach of tenancy.
- It is a one on one neighbour dispute.

8. Prevention

8.1 We believe preventative action is integral to effective anti-social behaviour management. We want to do everything we can to prevent anti-social behaviour before it starts. Accordingly, we have established a number of measures to

Cernach Housing Association Neighbour Disputes & Anti Social Behaviour Policy (Cont'd)

minimise the circumstances that can give rise to anti-social behaviour. This includes:

- The design of new developments informed by need to prevent nuisance and anti-social behaviour problems.
- Effective use of CCTV cameras.
- Promoting awareness of neighbour nuisance and anti-social behaviour and ways of addressing it.
- Housing applications may be suspended where evidence exists of an anti-social behaviour problem and a warning has been issued.
- The sign-up and settling in visit reinforcing the legal contract between landlord and tenant, explaining how neighbour nuisance and anti-social behaviour is investigated and tackled.
- Information leaflets that provide advice on neighbour nuisance and anti-social behaviour and what the Landlord can do to help.
- Remove graffiti quickly and review security provision as part of ongoing maintenance work.
- Gather information to highlight emerging problems and target preventative measures.

9. Key Actions

9.1 The Key elements of the Neighbour Disputes and Anti-social behaviour policy methods are summarised below:

- 9.2
- a) All new tenants will be visited within six weeks of start of tenancy and reminded of their responsibilities to respect their neighbours and not cause undue disturbance or disruption to other residents.
 - b) By building good partnerships with the Police, Glasgow City Council and any other relevant agencies who could assist.
 - c) Respond promptly, sympathetically and decisively to any complaints made relating to anti-social behaviour of tenants, their household and any visitors to their home.
 - d) Recording and responding to all complaints made within agreed timescales.
 - e) Encourage residents to resolve their disputes by mutual agreement.
 - f) Ensure that other relevant agencies such as Police, Social Work, Environmental Health and Glasgow City Council play a full role in resolving behaviour or taking action, particularly where it is more appropriate for them to do so.
 - g) Where serious problems occur (especially of a criminal nature) the Association will engage the Police in working towards a solution.
 - h) Where this fails the Association will take swift action to try to resolve the problem, involving a structured approach and the use of incremental

Cernach Housing Association Neighbour Disputes & Anti Social Behaviour Policy (Cont'd)

sanctions. Only pursue court action for eviction as a last resort (where behaviour is categorised as serious and/or persistent).

- i) Where problems persist the Association will take appropriate enforcement action under its Tenancy Agreement, or by otherwise using any legal means at its disposal, up to and including the use of ASBO's, and/or eviction.

10. Drug Dealing

10.1 It is the view of the Association that drug dealing in particular will not be tolerated in its locality and that special initiatives will be in place in order to effectively deal with this issue, including regularly publicising the action which will be taken when drug dealing occurs.

10.2 Potential legal remedy available in relation to drug dealing includes the streamlined repossession procedure under the Housing (Scotland) Act 2014, where the tenant has been found guilty by the courts of a specified criminal offence such as drug dealing.

10.3 Dealing from the Property

Any situation whereby a tenant, household member or visitor, who was convicted of being concerned in the supply of drugs from the property, would result in the Association seeking repossession of the property through the correct legal route.

10.4 Dealing in the Locality

(DEFINITION: "Locality" to be treated as the whole of the G15 postcode, i.e. Drumchapel/Blairdardie.

- a) Section 14 of The Housing (Scotland) Act 2014 removes the "reasonableness" test in action for recovery of possession whereby the landlord does not require to prove it is reasonable to request recovery of the property in cases where the tenant has been convicted of using the house for immoral or illegal purposes or an offence punishable by imprisonment committed in, or in the locality of, the house within the past year. This can include instances where an Anti-Social Behaviour Order has been breached or drug offences.
- b) Any situation whereby a household member (whether officially resident or not) or visitor was convicted of being concerned in the supply of drugs in the locality, would result in a First and Final Warning letter being issued to the tenant. The Association would also apply for an ASBO in respect of the convicted person. Should that same person be convicted of being concerned in the supply of drugs in the locality for a second time, then

Cernach Housing Association Neighbour Disputes & Anti Social Behaviour Policy (Cont'd)

this would result in the Association seeking repossession of the property.

- c) Any other incidents involving drugs would be considered individually, within general anti-social behaviour criteria, eg. Where there was no conviction for dealing, but some evidence that there may be dealing taking place.

11. Harassment

11.1 Harassment is arguably the most serious of all neighbour and neighbourhood nuisance and is given a separate section within the policy in order to ensure that residents are left in no doubt as to the seriousness in which harassment is viewed by the Association and that staff are made aware of the particular procedures to be followed when a case of harassment occurs.
This section will deal with harassment in general.

11.2 Definition of Harassment

11.2.1 SFHA's "Raising Standards in Housing" (Chpt 16, p45) states that there is no clear definition of harassment, but that it is, essentially:

"Unacceptable behaviour that is unwanted, unreciprocated and is regarded as offensive by the recipient, whether or not the harasser intended to be offensive."

11.2.2 Behaviour that can Constitute Harassment

- Bullying
- Unwelcome attention
- Subjecting someone to insults or ridicule because of their disability, HIV status, race, sex, sexuality, etc.
- Displays of material such as pornographic pictures, offensive literature, etc.
- Insensitive jokes or pranks
- Physical violence
- Verbal abuse
- Incitement by means such as petitions, leaflets etc.
- Damage to property such as graffiti, bricks through windows, etc.
- Threat to life such as lighted materials through the letter box
- Lewd, suggestive or over familiar behaviour
- Deliberate interference with another person's peace, comfort and safety
-

11.2.3 Although harassment comes in many forms, particular attention is drawn to the definitions contained within the aforementioned Equality and Human Rights Policy and are as follows:

Harassment Grounds

- Race
- Religion or belief
- Gender reassignment
- Sexual Orientation
- Marriage and civil partnership
- Disability
- Age
- Pregnancy and maternity
- Sex

11.2.4 The Association will pay due regard to the above and to any other situations which it considers to constitute harassment including:

- Nationality
- Cultural background
- Ethnic origin
- Employment status
- Tenure
- Domestic circumstances

11.3 Definition of Racial Harassment

11.3.1 Racial harassment is dealt with under a separate policy entitled Racial Harassment.

11.4 Dealing with Harassment

11.4.1 The Association will attempt to prevent harassment occurring in the first place by taking opportunities to promote the unacceptability of harassment, via policies, newsletters, handbooks, training, allocations and the lettings process. The Association will also assist victims of harassment in accessing counselling and support services.

12. Categorisation of Disputes

12.1 It is useful to categorise complaints to encourage consistency of approach and to clarify to all concerned the likely response of the Association. It should be recognised however that not all cases will be easily categorised.

Cernach Housing Association Neighbour Disputes & Anti Social Behaviour Policy (Cont'd)

12.2 Complaints will be categorised into one of the following three categories:

- a) **Extreme (Category A)**
Complaints of a very serious anti social nature e.g. drug dealing, violent conduct including un-provoked assault, harassment relating to a protected characteristic as defined by the Equality Act 2010, and serious damage to property, including fire raising.
- b) **Serious (Category B)**
Complaints which indicate serious anti social behaviour, e.g. frequent disturbances, excessive and persistent noise, vandalism/damage to Association property, misuse of drugs, harassment, and verbal abuse.
- c) **Nuisance/Disputes (Category C)**
Complaints which clearly breach the tenancy conditions but are of a relatively minor nature e.g. Infrequent disturbances, Noise complaints, behaviour of visitors or children, basic breaches of tenancy i.e. pet nuisance or improper waste disposal, family disputes affecting neighbours.

The above lists are not intended to be exhaustive.

13. The Roles Of The Parties Involved In Complaints

13.1 Association Tenants

13.1.1 The Association believes that, in general, the most effective way in achieving a favourable outcome at any stage in a neighbour complaint is for the complainant to become directly involved in the case and this will therefore be encouraged, but with due regard to personal safety issues.

13.1.2 Whilst many issues can be directly investigated by the Association, it is imperative that tenants contact the most appropriate agency for their complaint, for example reporting excessive noise complaints to the GCC Noise Team. Where this is advised by Association staff and is not followed by the tenant complaining, the Association may be unable to continue dealing with the complaint further.

13.2 Non-Association Tenants and Others

13.2.1 Where a complaint is received against an Association tenant from persons other than another Association tenant, e.g. tenant of another landlord, visitor, sharing owner, owner, shopkeeper, then such complaints will still be dealt with under the terms of this policy.

Cernach Housing Association Neighbour Disputes & Anti Social Behaviour Policy (Cont'd)

13.2.2 Where a complaint is received from an Association tenant against, for example, an owner or sharing owner, or the tenant of another landlord, then the Association will become directly involved where appropriate and provide advice and assistance where it cannot do so. For example, a tenant may require to raise their own interdict against an owner who is, say, harassing them, but the Association can liaise with the other Landlord where the case involves a non-Association tenant.

13.2.3 The Association will, however, take direct action wherever possible. The case may also be referred to Glasgow City Council's Community Relations Unit who provide a mediation service.

13.3 The Association

13.3.1 Whilst we will always endeavour to take action where we can, it is important to recognise that as a housing organisation law enforcement does not fall within our remit. Matters of a criminal nature should be reported to the Police in the first instance, as this will allow us to take further action secondary to any criminal proceedings. All complainants should consider if they have taken up the matter with the correct authorities as well as reporting it to us as their landlord.

13.4 Remedies and Responses

13.4.1 The Association will consider a number of responses in relation to anti-social behaviour and includes, but is not limited to, some of the following actions

- Home visits.
- Correspondence with tenants involved.
- Office interviews.
- Mediation services.
- Referral to Police Scotland where activity is of a criminal nature.
- Requests to Police Scotland for information in relation to specific incidents where they have been involved.
- Acceptable Behaviour Agreements.
- Unacceptable Behaviour Notices.
- Anti-Social Behaviour Orders.
- Conversion of a Scottish Secure Tenancy to a Short Scottish Secure Tenancy.
- Issue a Notice of Proceedings for Recovery of Possession as a warning against continued breach of tenancy.
- Proceeding to Repossession of Tenancy at the Sheriff Court.
- Work with Police Scotland and others using other appropriate enforcement powers as set out in the Anti-Social Behaviour Act 2004 and 2010.

Cernach Housing Association Neighbour Disputes & Anti Social Behaviour Policy (Cont'd)

13.4.2 We will refuse to deal with complaints should tenants fail to follow guidance issued or contact the appropriate agencies. For example, if a tenant fails to report excessive noise to other agencies like Police Scotland.

13.4.3 The Landlord will only consider eviction action as a last resort and if it is reasonable to do so.

13.5 Short Scottish Secure Tenancy Agreement

13.5.1 The Housing (Scotland) Act 2014 gives social landlords the powers to convert an existing tenants Scottish Secure Tenancy Agreement (SST) to a Short Secure Tenancy Agreement (SSST) or to grant SSST to a new tenant in cases where there is evidence that the tenant, a member of their household or a visitor has been involved in anti-social behaviour in or near their home in the last three years. This extends existing powers for the issue of a SSST (which previously required the tenant to have been evicted for anti-social behaviour or subject to an Anti-Social Behaviour Order (ASBO) within the last three years).

13.5.2 The SSST must be granted for an initial term of 12 months. This may be extended for a period of six months where the tenant requires further tenancy support.

13.5.3 Notice is required to be served to advise the tenant of the change to their tenancy conditions. The SST would end on the serving of that notice. The SSST may convert back to a SST if certain conditions are met.

13.5.4 Setting a minimum 12 month term for SSST's for anti-social behaviour is intended to allow more time for support services to have an effect and prevent the need for eviction action at a later stage wherever possible.

13.5.5 The Association can take legal action during the period of the SSST and will make this decision on a case by case basis.

14. Complaints

14.1 The Association has a published Complaints policy & procedure, which can be used where there is dissatisfaction with this policy or the operation of this policy. Any tenant who feels aggrieved by their treatment under this policy can ask for a copy of the Association's complaints policy, which is available at the Association's office and on the website www.cernachha.co.uk.

Cernach Housing Association Neighbour Disputes & Anti Social Behaviour Policy (Cont'd)

- 14.1 As with all our service policies, the complaints policy can be made available in large print, translated or on tape. Tenants also have the right to complain to the Scottish Public Services Ombudsman if they are not satisfied with our stage 2 response.

15. OTHER ISSUES

15.1 Staff Safety

Staff security and safety must be considered at all times with regard to the interviewing of complainants and offenders particularly with regard to complaints in Categories A and B. Accompanied visits will be carried out in these instances. Staff will also carry mobile phones at all times.

15.2 Housing Allocations and Anti-Social Behaviour

In particular circumstances the Association will have discretion to suspend an internal transfer, housing list or nomination applicant for rehousing where there is clear and recent evidence of anti-social behaviour.

16. Anti-Social Behaviour Complaints and Committee Members

- 16.1 If an anti-social complaint is made by or about a Committee member or a member of their immediate family it will be treated as any other complaint with the exception noted below: -
- a) Any Committee members directly involved in such a complaint must not be in attendance at a Committee meeting during discussion of a specific case or discussion of a policy matter which has a direct bearing on the Association's response to the complaint.
 - b) Management Committee members who have an indirect involvement in a specific case e.g. if they are resident in a close where a dispute or incident occurred will consider their attendance during any relevant discussion at a Committee Meeting.
 - c) If upon investigation it is revealed that a committee member is behaving in an anti-social manner they will be removed from Committee under the terms of Rule 43.2 and 44.1

**Cernach Housing Association
Neighbour Disputes & Anti Social Behaviour Policy (Cont'd)**

17. Staff Training

17.1 Cernach recognises that it is extremely important that the resourcing and training of staff is adequate to meet all the needs of its tenants. The Association is committed to making training relating to effective management of anti-social behaviour and neighbour disputes is available to staff. Training should be updated as appropriate. Staff will be encouraged to network with other RSLs in order to share best practice in dealing.

18. Policy Review and Tenant Consultation

18.1 The Association has developed this policy in consultation with tenants and the resident participation group and take account of representations made.

18.2 The Association will publish a summary of this policy in our newsletters and make it available of the Association website.

18.3 The Operations Sub-Committee will review the Neighbour Disputes and Anti-Social Behaviour Policy every three years. This review will be brought forward if there is need to respond to new legislation and/or policy guidance.

Cernach Housing Association Equality Impact Assessment Tool



Name of the policy / proposal to be assessed	Neighbour Dispute and Anti-Social Behaviour Policy	Is this a new policy / proposal or a revision?	Revision
Person(s) responsible for the assessment	Laura-Jane Richards		
1. Briefly describe the aims, objectives and purpose of the policy / proposal	<p>The Association aims to help residents maintain the quiet enjoyment of their homes and operate a policy to assist in preventing incidents of anti-social behaviour and neighbour disputes occurring. When incidents do occur, the Association will take appropriate steps as laid out in the policy to investigate and take action as required.</p> <p>This policy provides clear information relating to those situations in which the Association is not able to take action.</p> <p>The policy provides clear information relating to the responsibility of tenants in relation to their behaviour in how they interact with neighbours, staff, contractors and other agents.</p>		
2. Who is intended to benefit from the policy / proposal? <i>(e.g. applicants, tenants, staff, contractors)</i>	Tenants, residents, owners, staff and contractors		
3. What outcomes are wanted from this policy / proposal ? <i>(e.g. the benefits to customers)</i>	<p>For the Association to provide quality homes in an environment where tenants feel safe.</p> <p>To take a multi-agency approach in investigating neighbour disputes and anti-social behaviour incidents.</p> <p>To ensure tenants and residents understand their own responsibilities relating to respect for others.</p>		

4. Which **protected characteristics** could be **affected** by the proposal? (*tick all that apply*)

- Age x Disability Marriage & Civil Partnership Pregnancy/Maternity
 Race
 Religion or Belief Gender Gender Reassignment Sexual Orientation

5. If the policy / proposal is not relevant to any of the **protected characteristics** listed in part 4, state why and end the process here.

	Positive impact(s)	Negative impact(s)
<p>6. Describe the likely positive or negative impact(s) the policy / proposal could have on the groups identified in part 4</p>		<p>Race – there could be barriers to participation based on language formatting of consultations.</p> <p>Disability – there could be barriers to accessing physical services for disabled people, or in reading or writing written communications</p>
<p>7. What actions are required to address the impacts arising from this assessment? (<i>This might include; collecting additional data, putting monitoring in place, specific actions to mitigate negative impacts</i>).</p>	<p>To address race related barriers, written and oral materials can be provided in translated formats.</p> <p>To address disability related barriers, written materials can be provided in alternative format and our venues are accessible.</p>	

Signed: _  (Job title): Senior Housing Officer

Date the Equality Impact Assessment was completed: 29/7/2022

Please attach the completed document as an appendix to your policy / proposal report