

## RBG Housing Equality Impact Assessment (EIA)

This assessment enables us to check that the proposal does not have an adverse impact on target groups, have considered how it may further equality aims, and help us to identify relevant action to be taken. This is in line with the 3 aims of the Equality Duty to have due regard to:

- Eliminate unlawful discrimination
- Advance equality of opportunity
- Foster good relations

<b>Name of Proposed (policy, review, project, restructure or functional change)</b>	<b>Status</b>	<b>Date(s) of assessment</b>	<b>Responsibility for policy Name, job title, section</b>	<b>Person(s) carrying out EAA</b>
Housing and Domestic Abuse Policy	New	Feb 2020 - July 2020	Jamie Carswell, Director Housing & Safer Communities	Zainab Ibrahim-Noor Housing & Domestic Abuse Response Improvement Officer  Lydia Lewinson Performance, Policy and Development Manager
<b>Summary of the policy/project/service change and scope</b>	<p>The Housing and Domestic Abuse policy firstly sets out the responsibilities, service standards and commitment of the Housing and Safer Communities department in meeting the needs of those experiencing domestic abuse (DA).</p> <p>Secondly, it also sets out how we will assist and support any person experiencing or affected by domestic abuse. The policy applies to all tenants, non-tenants and those approaching from other local authority areas, regardless of their age, gender, sex, disability, ethnicity, religion, social background or any other characteristic.</p>			
<b>Aims, objectives, expected outcomes</b>	<p>The policy aims to ensure everybody has equality of access to appropriate advice, support and re-housing services where required.</p> <p>Aims:</p> <ul style="list-style-type: none"> <li>• Reduce the incidences of domestic abuse</li> <li>• Safeguard, assist and support victims and their children</li> </ul>			

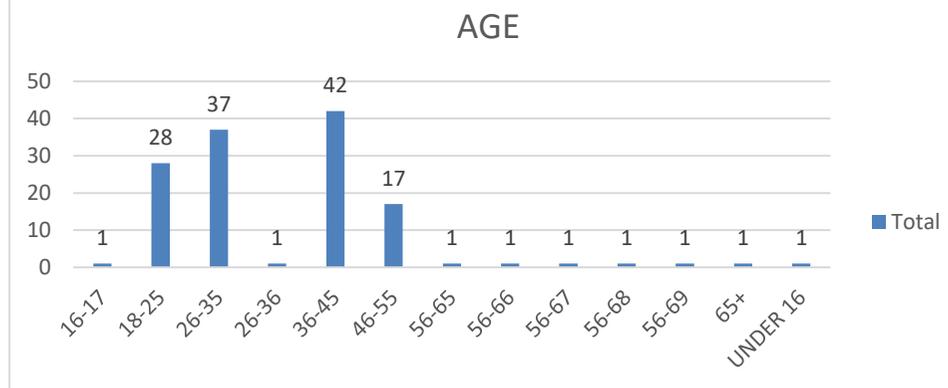
	<ul style="list-style-type: none"> <li>• Conduct risk assessments and safety planning in a timely manner</li> <li>• Provide training and support to frontline officers and partner agencies to both assist victims and to sustain better practice and delivery of services</li> <li>• Offer a fair, accessible and equitable service to all those experiencing or fleeing DA, who approach HSC</li> </ul> <p>Objectives:</p> <ul style="list-style-type: none"> <li>• Providing a fair, consistent and empathetic service within the constraints of the law</li> <li>• Providing victims with information about services and housing options available to them, including management transfers, additional security measures and advice on how to find and secure accommodation</li> <li>• Working in partnership with internal and external stakeholders to tackle incidents of DA</li> <li>• Standardise the response across HSC, with clear and efficient pathways to advice, help and support</li> <li>• Providing officers and partner organisations, with training and support</li> </ul> <p>Outcomes:</p> <ul style="list-style-type: none"> <li>• Consistent professional and empathetic response to domestic abuse</li> <li>• Early identification and response to victims underpinned by policies and procedures</li> <li>• Improved information, signposting, and access to effective local support</li> <li>• Reducing the length of time that victims suffer from domestic abuse</li> <li>• Strengthening the ability for victims to stay in their homes safely, reducing the need to disrupt children’s schooling or move away from family and friends</li> <li>• Preventing future homelessness</li> <li>• Established re-housing pathways to ensure safety and swift routes into resettlement</li> <li>• Better trained and equipped frontline staff</li> </ul>
<p><b>Responsibility for implementing and monitoring this policy/service change?</b></p>	<p>Recording and monitoring the number of DA cases reported, profile of victims, the type of action taken, outcomes achieved, and the progress of the case management will be undertaken by:</p> <ul style="list-style-type: none"> <li>• Housing and Safer communities</li> <li>• Housing Inclusion Service</li> <li>• Tenancy services</li> </ul> <p>The Performance and Development team within HIS will audit and validate the information being recorded to ensure the data is robust. Surveys will be undertaken to gather feedback from DA survivors to help</p>

	<p>identify any gaps in service provision and implement changes to ensure the future provision taken into consideration of service users also.</p> <p>The HSC DA policy is to be reviewed annually, ensuring that it continues to meet its objectives and taking into account good practice development.</p>
<p><b>Data and research</b></p>	<p>The data used to inform this impact assessment has been captured from:</p> <ul style="list-style-type: none"> <li>• Housing Inclusion Services management system – Northgate (DA reports April 2019-March 2020)</li> <li>• VAWG strategy 2019-2021</li> <li>• VAWG SGP performance report 2019-20</li> <li>• Homelessness Code of Guidance (chapter 21)</li> <li>• Her Centre Annual Customer Surveys</li> <li>• Royal Greenwich - Women’s Refuge Services Annual Survey</li> <li>• Office for National Statistics - Domestic Abuse in England &amp; Wales (2018)</li> <li>• Safe at Home: the case for a response to domestic abuse by housing providers</li> <li>• Galop</li> <li>• Broken Rainbow UK</li> <li>• Albert Kennedy Trust (AKT)</li> </ul>
<p><b>Consultation and communication</b></p>	<p>The outcome of consulting with the following services and organisations identified firstly, a need for a DA policy. Secondly, the necessity to create procedures which provide clear guidance to housing staff on how to respond to appropriately, to all victims of domestic abuse.</p> <ul style="list-style-type: none"> <li>• Safer Communities team - identified training for all staff was crucial to ensure risk assessments were carried out correctly and thoroughly.</li> <li>• Albert Kennedy Trust developed a bespoke training service for frontline workers, to increase their knowledge and understanding of working with the LGBTQ community.</li> <li>• Tenancy services – identified the need to update and use correct risk assessment forms</li> <li>• Housing Inclusion Services – ensured training on familial abuse, DA and LGBTQ+ community and DA for male victims, was made available to managers and staff.</li> <li>• Domestic Abuse Housing Alliance (DAHA) provided guidance on how we can improve our service, strengthen our partnership with RSLs. Also, how to standardise, procedures across all services to achieve the DAHA accreditation.</li> </ul>

	<ul style="list-style-type: none"> <li>• A steering group is currently active with key partners: The Her Centre, Greenwich Domestic Violence and Abuse services and Children and Adult services. The steering group oversees Domestic Improvement Work within Housing and Safer Communities and supports the implementation of RBG's Domestic Abuse Housing Alliance (DAHA) Accreditation.</li> <li>• Increased regular liaison with local DA agencies during the Pandemic to ensure that services are accessible and available, as the increase in DA approaches is nationally recognised.</li> <li>• The safety from violence and emotional support from workers, received the two highest scores in Survey responses from women in the local (H4W), DV Refuges.</li> <li>• The Her Centre, survey responses, which scored highest, were that of staff demonstrating a professional and approachable manner and being able to respond to their questions.</li> </ul>
--	--

**People Impact - Are there any reasons to believe that the policy/ service change could have an impact on the following:**

People Strand	Likely impact High/low/n one	Brief Explanation
<b>Age</b>	No impact	<p><b>AGE</b></p> <p>This policy addresses the needs of all age groups experiencing DA, including the children within the household. From this approach, we do not consider the proposals within the policy will adversely impact on this group. While people of all ages can be at risk of domestic abuse, our data shows that at both local and national level, that victims of domestic abuse tend to be in the younger age ranges, (26-35), particularly young women. Our policy addresses this fact by providing the appropriate support services for this younger age group. Frontline staff are trained to identify familial abuse and to ensure victims have the access to the support they need when presenting for housing support.</p>



**Age of reported victims of Domestic abuse approaching the HIS (April 2019/20)**

**Source: Data from Housing inclusion services management systems – based on reports of DA (Northgate) April 2019 - March 2020.**

<https://www.ons.gov.uk/peoplepopulationandcommunity/crimeandjustice/articles/domesticabusevictimcharacteristicsenglandandwales/yearendingmarch2019#age>

Royal Greenwich offer bespoke services to younger victims aged 18-25. Young People experiencing domestic and sexual abuse will be referred to:

- New Leaf, an innovative domestic abuse service tailored specifically for young people in Greenwich.
- RBG also runs a “Is this love?” campaign, asking young people to think about what makes a healthy and loving relationship.
- Teach young people to identify the warning signs of potentially harmful and controlling behaviour which could lead to domestic abuse.

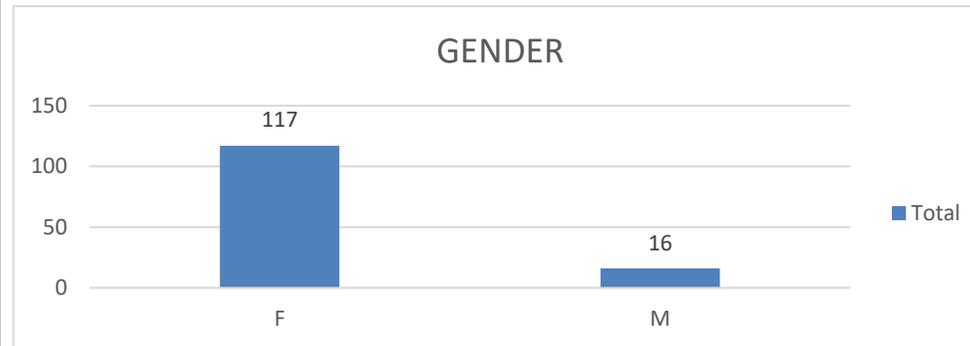
The Housing Inclusions Service, 1st Base Team also provides targeted support for young people (including Care leavers) age 18-25 who may be fleeing DA. The Services within Housing & Safer Communities and its key housing partners are trained and equipped to respond appropriately to all residents, tenants and callers of all ages. As Gang violence has incidences of rape and DA, the teams based at the Point, will make appropriate enquiries and referrals to other relevant youth, DA and statutory services to safeguard and assist those that maybe affected.

		<p>Even though there are lower incidences for people age 55+ years, the older People’s team within HIS and colleagues within Adult and Social care are experienced in supporting and safeguarding vulnerable adults who may be impacted by the various forms of DA, including financial abuse.</p> <p>Royal Greenwich recognise that children of victims of domestic abuse can be adversely affected by witnessing domestic abuse between their parents or other members of their household. In these cases, children would be referred to a Children’s Worker to address their emotional and school needs. Integrative and therapeutic support will be arranged for children, whilst their mothers receive emotional, legal and practical support. 52.63 (70 of the 133) DA approaches to the HIS, were from families with children. Therefore, safeguarding measures, and robust DA procedures are integral to the process.</p> <p>From this approach, we do not consider the proposals within the policy will adversely impact on this group. As this policy addresses the needs of all age groups experiencing DA, including the children within a household.</p> <p>We do not consider the policy will have a negative impact on this group.</p>
<p><b>Disability or Impairment</b></p>	<p>No Impact</p>	<p><b>Disability or Impairment</b></p> <p>Royal Greenwich currently hold limited data of people with disabilities reporting DA incidents.</p> <p>On this basis we are unable to tell the number of overall people with disabilities who maybe more vulnerable to certain kinds of abusive behaviour such as coercive controlling behaviour, financial abuse and being isolated from sources of support.</p> <p>However, for the period October 2018 - September 2019, records show there were only 6.98% MARAC referrals were made for disabled people. According to 2019 statistics by the Office for National Statistics (ONS), disabled people aged 16-74 are more likely to experience DA and most likely to be women.</p> <p>To address this potentially negative impact that this outcome creates. RBG have begun to:</p> <ul style="list-style-type: none"> <li>• Monitor this cohort more effectively to capture, type of disability, age, gender, and type of abuse.</li> <li>• Access and utilise data from other specialist external local support services.</li> </ul>

		<ul style="list-style-type: none"> <li>• Ensure victims are signposted to the relevant specialist agencies who provide specialist support, accommodation, facilities and advice.</li> <li>• Support victims to report incidents to the police or DA agencies.</li> <li>• Raise awareness amongst community, faith groups etc. and promote the services available</li> <li>• Highlight the particular needs of disabled victims in the delivery of training and through our publicity campaigns.</li> </ul> <p>By taking these steps to reverse this negative impact will ensure the policy will support these victims more effectively with the right support and services. Royal Greenwich recognise the reliance on customers to complete the equalities monitoring forms, to allow the authority to collect the data, to inform any future needs assessments. In 2019/20, of the 133 DA approaches to the Housing Inclusion Services, 9 self-reported as having a disability, which would equate to 6.77% of approaches.</p> <p>Royal Greenwich, offer specialist refuge accommodation for women with complex needs, including those with disabilities and long term health conditions. The provision prioritises meeting local needs. RBG also contributes to the Pan London Grant programme for specialist refuge provision outside the borough.</p> <p>Royal Greenwich has a number of partnership agreements including hospital discharge, mental health, prison release, which allow, those who are vulnerable due to a disability and leaving institutions have emergency or planned access to DA services, as required. Following risk assessments, home visits can be carried out and services tailored to meet those with a disability.</p> <p>Temporary accommodation and re-housing options, will take into consideration the access needs of the individual and specialist accommodation will be allocated according where the outcome assessment deems it necessary.</p> <p>We do not consider the policy will have a negative impact on this group.</p>
<b>Sex (Gender)</b>	No impact	<p><b>Sex (Gender)</b></p> <p>This policy does not have a negative impact on all victims approaching the HSC. Whilst both men and women may experience incidents of inter-personal abuse. In RBG, gender-based violence disproportionately affects women considerably more, particularly for those aged 16-59.</p>

Women are likely to experience repeated and severe forms of abuse, including sexual violence. They also experience higher rates of repeated victimisation. Over a 12 months period, HSC recorded more women reporting multiple DA incidents to the service. Most services are positively biased towards women, ideally to ensure that the needs of the cohort are met.

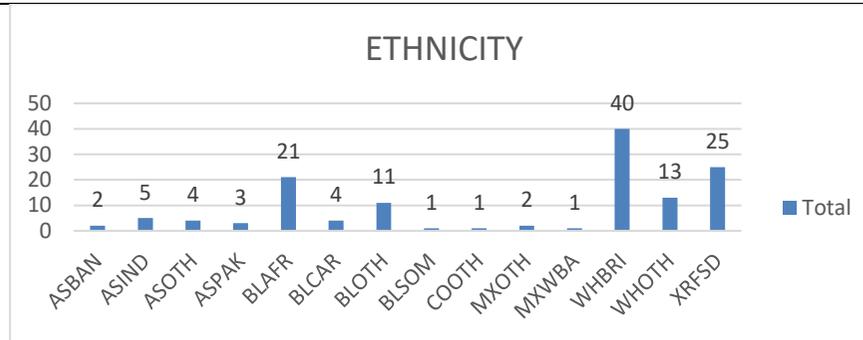
**Gender of reported victims of domestic abuse approaching HIS**



**Source: Data from Housing inclusion services management systems – based on reports of DA (Northgate) April 2019-March 2020**

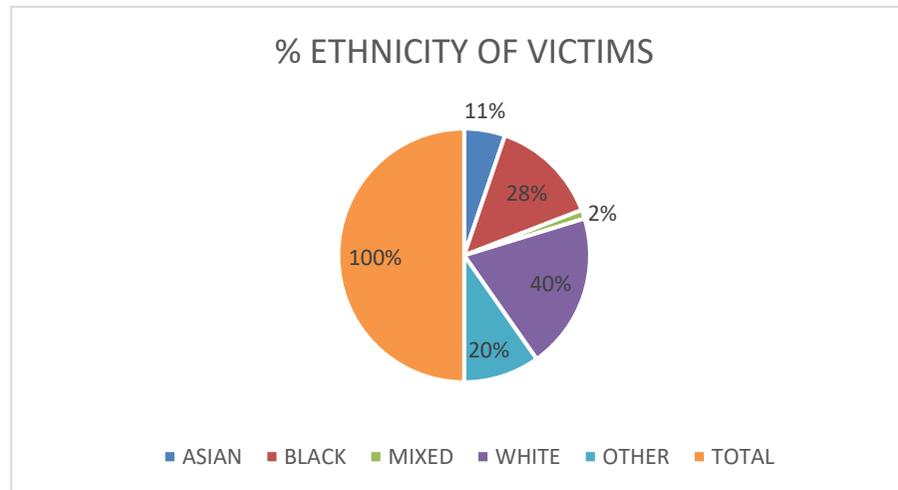
It is recognised that certain categories are under reported such as males and individuals in same sex relationships. The policy does not have an adverse negative impact on either gender, as services ensure that male victims or those in same sex relationships, experiencing or fleeing domestic abuse receive access to services and referral to specialist services, specifically modelled around the needs of the individual. The majority of victims of domestic abuse approaching the HSC, are female, we recognise that the DA policy demonstrates a high and positive impact, due to the tailored advice and expertise in services available, across the Council and partnerships. HSC ensures anyone who approaches our services receives the equality of access to advice, support and housing assistance, and also enables all genders access the most appropriate and relevant specialist services through the Council and partner agencies.

		<p>Rehousing services, including temporary accommodation, is available to all genders, and the Royal Greenwich funded specialist refuge provision within the borough and nationally is available to provide safety, and also a range of services incl. counselling and emotional support, help with re-housing etc to women and children.</p>
<p><b>Race and Ethnicity (including language)</b></p>	<p>No impact</p>	<p><b>Race and Ethnicity (including language)</b></p> <p>The policy does not have a negative impact on this protected characteristic group. Domestic abuse affects people from all ethnic groups. Whilst there is some difficulty in obtaining statistical data, there is no evidence to suggest that some ethnic communities are more at risk than any other group. It is recognised that there are barriers which may prevent some groups from reporting incidents of domestic abuse, including the Nepalese community within Greenwich, Work continues with Community workers and specialist Officers within the Council to ensure this group has access to services, information and advice suited to their cultural needs.</p> <p>The policy acknowledges that women from BAME groups may be more isolated or may have to overcome religious or cultural pressures which may lead to them being afraid of bringing shame to their family honour. The form of abuse experienced may however vary. In some communities, domestic abuse may be perpetrated by extended family members or it may include forced marriage or FGM.</p> <p>Staff are trained in the wider context of domestic abuse such as Honour Based Violence, female genital mutilation (FGM) and Modern Day slavery, too ensure that signs or opportunities to tackle this are not overlooked, within their daily duties.</p> <p>The proposed DA policy will negate any adverse impact by ensuring that in house Interpreting services and language line will be available to any victim where English is not their first language. Officers have access to Language Line and Royal Greenwich Translation Services, to allow them to liaise effectively with victims and their advocates. Staff are also trained to respond sensitively to the cultural differences. The Housing Inclusion Service has adopted a Domestic Abuse Charter to ensure the service recognises and responds fairly and empathetically to those approaching for services, which recognises the needs of those from different ethnic backgrounds.</p> <p><b>Ethnicity of victims reporting incidents of domestic abuse approaching HIS Source</b></p>



**Source Data from Housing inclusion services management systems – based on reports of DA (Northgate) April 2019-March 2020**

### Ethnicity of domestic abuse victims in Greenwich 2019/20



		<p>The above data shows that the majority of victims of domestic abuse approaching the Housing Inclusion Service are White British. RBG Staff and external partners have regular DA awareness training to ensure we reach all communities in RBG.</p> <p><b>NIL RECOURSE</b></p> <p>A large number due to their immigration status remain in violent relationships, forced to stay to the perpetrator or face destitution. The DDV (Destitution Domestic Violence Concession) allows women to access financial support while they make a claim for indefinite leave to remain (ILR) in the country. Royal Greenwich funded; DA agencies can assist women with making a claim for benefits under this regime. Those who approach HSC will be referred to the Nil Recourse to Public Funds Team, if a housing assessment determines they are not eligible for housing assistance.</p> <p>We do not consider the policy will have a negative impact on this group.</p>
<b>Religion or Belief</b>	No Impact	<p><b>Religion or Belief</b></p> <p>Whilst it is recognised that certain types of abuse do disproportionately impact upon women and girls from some communities. Women and girls from BME (black, minority, ethnic) backgrounds may find it more difficult to leave an abusive situation due to cultural or religious beliefs. Religion and faith can also play a major role in how victims deal with domestic abuse. Victims may look towards their faith leaders for help or turn to others with similar religious belief. Victims may use their support networks before seeking the usual support agencies/domestic violence services.</p> <p>Forced marriages, female genital mutilation (FGM) and so called ‘honour-based’ violence (HBV) are more likely to be prevalent (although not limited to) certain communities including BME communities, religious or national boundaries.</p> <p>Faith Group Leaders attend the Homelessness and other Royal Greenwich Forums and will receive information, advice and promotional materials to support, advice and signpost their congregants to the appropriate agencies.</p> <p>The policy is committed to supporting victims by:</p>

		<ul style="list-style-type: none"> <li>• Frontline staff conducting (DASH) Domestic Abuse Stalking Honour risk identification checklist and safety planning to support the victim and their children.</li> <li>• Improving our data collection and analysis to improve our understanding of different types of abuse disproportionately affecting particular BME groups. This will help us to provide targeted action to meet the needs of these BME individuals/ communities.</li> <li>• Targeting and working closely with statutory and voluntary agencies, including youth groups/Forums, community groups and faith leaders and raising awareness across the borough, including through the Homelessness Forum and Landlord’s Business Club.</li> <li>• Sharing information to manage the safety of victims in high risk cases to MARAC (multi agency risk assessment conferences). This includes the police, social services, community mental health and midwifery/pre-natal services, other NHS professionals and local authority departments.</li> </ul> <p>By taking this approach, the policy will reduce any negative impacts on this protected characteristic group when approaching the HSC.</p>																								
<b>Sexual Orientation</b>	No Impact	<p><b>Sexual Orientation</b></p> <p>DA amongst same sex couples is just as common and severe as amongst heterosexual couples, however, is often under reported. For the period 2019/20, our records show that the majority of victims of DA approaching HIS were heterosexual women compared to 22 men, gay, same sex relationships. Some victims chose not to state their sexual orientation or not have it recorded.</p> <table border="1" data-bbox="663 890 2018 1007"> <thead> <tr> <th colspan="4"><b>Male</b></th> </tr> <tr> <th>Financial year</th> <th>Heterosexual</th> <th>Gay same sex relationships</th> <th>Other/not stated</th> </tr> </thead> <tbody> <tr> <td>2019/20</td> <td>14</td> <td>1</td> <td>1</td> </tr> </tbody> </table> <table border="1" data-bbox="663 1050 2018 1166"> <thead> <tr> <th colspan="4"><b>Female</b></th> </tr> <tr> <th>Financial year</th> <th>Heterosexual</th> <th>Gay same sex relationships</th> <th>Other /not stated</th> </tr> </thead> <tbody> <tr> <td>2019/20</td> <td>87</td> <td>1</td> <td>29</td> </tr> </tbody> </table> <p>The policy acknowledges LGBTQ people may experience specific barriers when seeking to report incidents or getting support due to:</p> <ul style="list-style-type: none"> <li>• Real or perceived homophobia from service providers</li> <li>• The need to ‘out’ oneself to access services</li> <li>• The potential impact of internalised homo/bi/phobia</li> </ul>	<b>Male</b>				Financial year	Heterosexual	Gay same sex relationships	Other/not stated	2019/20	14	1	1	<b>Female</b>				Financial year	Heterosexual	Gay same sex relationships	Other /not stated	2019/20	87	1	29
<b>Male</b>																										
Financial year	Heterosexual	Gay same sex relationships	Other/not stated																							
2019/20	14	1	1																							
<b>Female</b>																										
Financial year	Heterosexual	Gay same sex relationships	Other /not stated																							
2019/20	87	1	29																							

		<ul style="list-style-type: none"> <li>• A lack of appropriate and specialist services and training</li> <li>• A lack of confidence in the Criminal Justice system</li> </ul> <p>Officers within the HSC, attend mandatory training by the Albert Kenney Trust (AKT). The training equips staff to recognise the signs of abuse, what and how to support the needs of individuals from the LGBTQ community, when they approach services in need of housing and/or DA services. The training also ensures Royal Greenwich and its partners are consistent and able to sustain better practice principles throughout service delivery.</p> <p>The policy not only ensures all staff and professionals have the skills, knowledge and confidence to identify and support / refer victims appropriately; but also improves the safety and wellbeing of victims. The policy supports and encourages LGBTQ victims to approach DA services to break the taboo of this under reported abuse and also ensures, access is provided to specialist agencies, including Metro following disclosure.</p> <p>We do not consider the policy will have a negative impact on this group.</p>
<b>Gender reassignment</b>	No impact	<p>Although this information is requested on a variety of forms, many customers approaching Royal Greenwich, decline to answer.</p> <p>HSC does not collect data in respect of this protected characteristic when recording incidents of domestic abuse. Likewise, national statistics tends to group data relating to transgender with lesbian, gay, and bisexual people. This makes it difficult to gain an accurate picture of the true extent of DA amongst the transgender community.</p> <p>The policy will benefit residents who have reassigned their gender by:</p> <ul style="list-style-type: none"> <li>• Continuing to treat all service users equitably and respect people’s gender identity</li> <li>• Referring victims to specialist agencies such as Metro, who provide services specifically for this protected characteristic cohort</li> <li>• GALOP provide emotional and practical support for LGBTQ+ people experiencing domestic abuse</li> <li>• Delivering consistent service standards to all victims, including trans people who may experience discrimination, when accessing single sex services.</li> </ul>

		Overall, this policy will have a no impact on this protected characteristic.
<b>Pregnancy and Maternity</b>	No Impact	<p><b>Pregnancy and Maternity</b></p> <p>We do not hold data on this protected characteristic in relation to housing and DA. Nevertheless, we do not consider the proposals within this policy will adversely impact on this group. Abuse towards a pregnant woman endangers both the pregnant woman and her unborn child, which represents abuse to an unborn child. This can become subject to child protection procedures. HSC will consider when it is appropriate to refer any safeguarding situations to Children’s Services. HSC work closely with NHS Health Providers, including Maternity and Midwifery services, attend case conferences to provide support to individuals and inform meetings of re-housing options.</p> <p>In the latest Commissioning round, a 5 bed unit, was re-commissioned for teenage parents, although it was not specifically for those fleeing DA, it provides supported accommodation if required. Refuge spaces and Temporary Accommodation is provided to those fleeing DA, to ensure there is a place of safety, until a suitable re-housing solution can be found.</p> <p>We do not consider the policy will have a negative impact on this group.</p>
<b>Marriage/Civil partnership*1</b>	No Impact	<p><b>Marriage/Civil partnership</b></p> <p>HSC data of the incidents reported to HSC in the last three years are low and inconclusive to confirm if people married or in a civil partnership are less likely to experience DA. Where clients are within joint tenancies or joint-owners of properties, they will have access to legal advice to ensure they are not trapped within the situation. Tenancy can support the legal process to have the perpetrator removed from the tenancy and allow the victim and family to remain in the home, even if the tenancy was not in the victim’s name.</p> <p>We do not consider the policy will have a negative impact on this group.</p>
<b>Other</b>		

<sup>1</sup> For this protected characteristic, analysis only applies to elimination of unlawful discrimination

<b>What other risks/factors will be taken into account in the decision making?</b>	This policy will be delivered within the legal and political framework that currently exists. However, this could potentially shift over the lifetime of the policy and will be amended to take into consideration any future legislative changes. For instance, the impending Domestic Abuse Bill 2020, waiting to be passed by Parliament.
<b>How will any identified risks be minimised?</b>	The policy will be reviewed to maintain alignment with any future legislative and service changes.

**Decision making:**

<b>If yes to any of the questions below – prepare an action plan to address</b>	<b>Yes/No</b>
Does the policy/service discriminate (directly or indirectly) against any section of the community?	No
Do the changes have the potential to create inequality or worsen existing inequality?	No
Do the changes have potential to address existing inequality – such as promoting positive treatment, attitudes to, or participation of disadvantaged groups?	Yes
Are there ‘significant’ gaps in our knowledge which prevent us from making a reasonable assessment?	No

<b>High/Low/No impact (on protected characteristics)</b>	
<ol style="list-style-type: none"> <li>1. <b>No major change</b></li> <li>2. <b>Adjust proposal</b></li> <li>3. <b>Continue proposal - with clear justification</b></li> <li>4. <b>Stop/remove proposal</b></li> </ol>	No potential adverse impact on protected characteristics and all opportunities to advance equality have been taken.

<b>Action plan attached?</b>	No
<b>Sign off</b>	Person(s) (name, job title) or group e.g. DMT  Date

**Summary Report** (where required):

<b>Focus: relevant protected characteristics</b>	
<b>Key questions considered</b>	
<b>Summary findings</b>	
<b>Data reviewed</b>	Summarise or state if appended
<b>Assessment of impacts (avoid, mitigate, justify)</b>	
<b>Recommendations</b>	
<b>Any further action</b>	