



POLICY AND STANDARD OPERATING PROCEDURES

Title	Unauthorised Encampments Policy		
Policy Reference No	R012		
Procedure(s) Ref. No			
Version No.	3.0		
Senior Officer Lead	Assistant Chief Constable		
Author	Local Policing		
Ratifying Group	Force Ops Board	Date	November 2016

1 Purpose.

1.1 This policy establishes how Bedfordshire Police will respond to unauthorised encampments.

2 Revision History.

Date	Revision	Change	Section	Review Date
June 01	New			June 03
March 2010		New Format and This Policy has been updated to incorporate the ACPO Guidance on Unauthorised Encampments 2009.		March 2012
May 2013	1.1	Policy revised and updated in line with the 2011 ACPO Guidance on Unauthorised Encampments	All	December 2015
July 2016	2.0	Typos and minor policy / practice detail added Operational review by Insp Day (Response)	Author and ratifying Board 6.1.1 Unitary Authorities 7.2 THRIVE 7.3 SOP Compliance 8.1 Communication 9.4 Body Worn Video policy	September 2017
September 2016	2.1	Feedback following Force OPs Board THRIVE – provide a ‘template’ of key issues that ought to be taken into consideration when considering THRIVE for encampments Use Joint Decision Making Model	Updated to show THRIVE based approach to immediate supervision and management.	

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		as this will typically be a joint response.		
November 2016	3.0	Full review of Policy following engagement with partners and internal force Gold Group feedback Re-classification of the document as 'not protectively marked' in order to share with interested parties and key partners	All	November 2016

3 Persons Affected.

- a) All Police Officers, Police Staff and Special Constabulary
- b) Persons encamped unlawfully.
- c) Community Superintendents
- d) Local Policing Operations Chief Inspector & Community Chief Inspector
- e) Duty Inspectors
- f) Force Control Room
- g) Landowners
- h) Local Authorities
- i) Gypsy and Traveller Communities
- j) Settled Community Representatives
- k) Bedfordshire IAG

4 Compliance

4.1 This Policy / SOP will be monitored for compliance by the Inspector Community Safety and captured under OP Wan on Force Daily Documents

4.2 Associated Documentation / Legislation:

- Equality Act 2010
- Human Rights Act 1998
- Race Relations (Amendment) Act 2000
- Criminal Justice and Public Order Act Sections 61 and 62 A-E
- College of Policing APP – Engagement and Communities
- ACPO Guidance on Unauthorised Encampments 2011
- Criminal Justice and Public Order Act 1994

5 Policy.

5.1 Bedfordshire Police complies with Authorised Professional Practise issued by the College of Policing and has established a local policy and procedure in respect of unauthorised encampments, in order to provide clear standards and guidelines. The Force also supports and works in accordance with the ACPO (NPCC) Guidance on Unauthorised Encampments (2011).

5.2 The Force has a duty to provide necessary and proportionate policing services in support of our legal obligations, in respect of all types of encampments, on both private and local authority owned land. This policy has been established in order to build confidence of both our travelling communities and our settled communities.

5.3 The Equality Act 2010 makes it unlawful to treat someone less favourably because of a range of protected characteristics, including colour, race, nationality or ethnic or national origins. The following of a nomadic lifestyle is lawful, indeed it is a culture that is recognised and protected through legislation. Romany Gypsies and Irish Travellers have been granted protection under the previous Race Relations Acts. The Public Sector Equality Duty applies to the police and places a duty on forces to have due regard to the need to eliminate unlawful racial discrimination and promote equality of opportunity and good relations between persons of different racial groups. There is no legal right to trespass, however, and the law provides a wide range of powers to remove people unlawfully on land.

5.4 It is essential that the police response takes account of the issues of behaviour, whether criminal, anti-social or nuisance, in combination with the impact on the landowner and settled community rather than simply because encampments are present at a specific location. Police powers to evict people from unauthorised encampments do exist, as provided for by Sections 61 and 62 A-E, Criminal Justice & Public Order Act 1994. These powers will be used where behaviour or conduct is considered to be inappropriate, or where the impact of an encampment on others is deemed unacceptable. This position is consistent with all other areas of enforcement within the community. Guidelines on the exercise of police powers concerning unauthorised encampments are given later in this document.

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- 5.5 Decisions to evict or not must be balanced, and be compliant with the terms of the Human Rights Act 1998, demonstrating legality, necessity, and proportionality, as well as principles of common humanity. The grounds for each decision must be fully recorded by the decision maker and kept for audit processes or legal challenge for seven years. Guidance on how decisions and actions are recorded is provided later in this document.
- 5.6 The scope of this procedure does not cover the situation whereby individuals purchase their own land and occupy it, with or without planning permission. Such an incident would be an unauthorised development and the local authority would lead in this situation.
- 5.7 In managing unauthorised encampments officers must be sensitive to the fact that there is a lack of pitches on authorised sites across the country, making it difficult or even impossible for people to avoid setting up unauthorised pitches.

6 Definition

- 6.1 The definition of 'unauthorised encampment' is:

Anyone who with a view to camping, trespasses on land they do not own (e.g. playing fields, farmer's fields or other private land).

7 Principles

- 7.1 The overall stance of the Force is that in considering any unauthorised encampment, a balance must be maintained between the rights of those encamped and the rights of landowners and the settled community.
- 7.2 Police officers and staff must act in a neutral, objective and open way, ensuring that each encampment is considered on an individual basis. We acknowledge that the majority of persons on unauthorised encampments are law abiding, with a minority who may take part in criminal or antisocial behaviour. It is generally the behaviour of this minority that causes antagonism and resentment within the settled community.
- 7.3 Regard to the human rights of both the campers/travellers and the settled community will have to be taken into account, and police action will have to demonstrate impartiality and proportionality. Like settled communities, those on encampments are entitled to a life free from the fear of crime, harassment and intimidation.
- 7.4 The Force will undertake to:
- a. Provide a consistent policing response towards those on encampments, landowners/agents and other members of the settled community
 - b. Consult those on encampments as well as the settled community, when making decisions that impact upon their lives
 - c. Proactively investigate allegations of crime, harassment and intimidation against them

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- d. Be demonstrably fair, open and transparent in all of our dealings with them, and
- e. Reassure the settled community that the authorities are taking appropriate, proportionate and legal action

8 Working with Other Agencies

- 8.1 Police may be requested to accompany other agencies to an encampment to assist them for a lawful purpose. Police will support local partners but must ensure that officers do not become agents for the other parties, and on such occasions maintain neutrality from the others purpose, but will provide reassurance to all involved that the peace will be maintained.
- 8.2 Police will work in partnership with the Local Authorities to provide an effective and lawful response to the management of unauthorised encampments. The use of police powers should not normally be considered as the first response to an unlawful encampment. The Community Superintendents for Local Policing (South and North) will act as the dedicated Liaison Officers with the relevant Authorities when required to ensure effective partnerships are maintained.

9 Standard Operating Procedure

- 9.1 All incidents of unlawful trespass by Gypsies or Travellers will be recorded as an incident on the Command and Control System. The incident will be categorised as anti-social behaviour with a sub classification of trespass. The word encampment in the free text will enable search fields to be narrowed to enable monitoring of unlawful trespass incidents. The Control Room should also notify the local authority as soon as possible and provide the details of the supervising officer coordinating the initial site visit.
- 9.2 The police will visit each newly established encampments and the Local Policing Superintendent will be notified to ensure that the SOP is followed and actions recorded. The officers conducting the initial visit should be deployed from an available resource at the time of notification of the encampment. Visits should, wherever possible, be done together with the landowner, local authority, and any other relevant agencies.
- 9.3 Initial contact will be made with the people on the site and an assessment made of the impact of its location, as well as the behaviour displayed by the occupants. The occupants should be spoken to in order to establish their identities and to ascertain their views on desired duration of stay as well as any pressing welfare needs. The details of the site visit will be recorded on a **F041a** by as supervisor using THRIVE methodology and should subsequently be reviewed by an officer of the rank of Inspector. This process should be proportionately escalated depending on Threat, risk and Harm. A scanned copy of the F041a is to be stored in the 'Unauthorised Encampments' folder on the 'G' Drive. This visit and written record will document any potential need to evict using police powers. This may be necessary where criminality, anti-social behaviour, or environmental damage is present, but each encampment must be assessed on an individual basis. If Police Powers are to be used the Local Policing Operations Chief Inspector will be notified, and if the situation permits coordinated through the Force Daily Management Meeting (FDMM) to coordinate resources and the police response.

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- 9.4 Officers should discuss with those present what constitutes unacceptable conduct and should issue a copy of the recommended **Code of Conduct** attached at **F041c**.
- 9.5 Officers should assess whether the location of the encampment, behaviour of residents or needs of the landowner justifies an eviction using police powers, see **4.17 Use of Police Powers**.
- 9.6 Liaison should be maintained with the landowner, those most affected by the establishment of the encampment and our partner agencies to assess the need for Police intervention. In accordance with guidance issued by the Department for Communities and Local Government, the local authority, as lead agency for unauthorised encampments, should take an active role in engaging with the site residents and will take the lead with sites established on their land, which do not require immediate police action. Periodic visits by police officers to the site can also be beneficial to get to know site residents and also to pick up on any community tensions that may give rise to more serious incidents. These visits will be enhanced if completed along with designated local authority staff members. The absence of such visits will not prohibit the future use of police powers, but may help in building information and intelligence, in order to assess threat, harm and risk, in order to inform any future decision to use, or not use, specific powers. These visits will also provide an audit trail to support decision-making and a summary of the visit must be recorded on the STORM log to ensure a full audit trail to assist in future decision making.
- 9.7 The decision whether or not to utilise police eviction powers should be periodically reviewed to establish if circumstances have changed that will require the use of a police eviction to protect the rights of others. All information concerning the site and the site occupants should be shared with all involved agencies (subject to the provisions of the Data Protection Act), to ensure that a balanced common approach is adopted in fairness to all. All updates should be fully recorded on the STORM log to provide a detailed audit of the information and intelligence justifying police actions. It may be appropriate after a period of 48 hours to review police data to establish any changes in crime patterns that may be associated with the presence of an encampment in an area.
- 9.8 Where appropriate, vehicles and / or any person details should be checked on the Police National Computer for 'markers' (which if present should be acted upon as appropriate). Any criminal intelligence should be submitted in the normal format using established intelligence systems.
- 9.9 There should be a clear audit trail of decision making which sets out the rationale for all decisions made. The **Eviction Rationale Record F041c** will be used to fully document the reasons and decisions for eviction of the unlawful encampment. Where separate Command and Control logs are created for specific incidents, which relate to the encampment, these should be 'linked' to the main log once concluded. At the conclusion of the occupation of the encampment the log should be endorsed suitably with the outcome, including any eviction powers used, and the general behaviour and conduct of the residents.

10 Use of Police Powers

- 10.1 The lead role in the management of unauthorised encampments is the local authorities. Bedfordshire Police will support the authorities by recording details of the initial site visit, and subsequent visits or information relating to the encampment. The authority will also be notified if a decision is taken to bring about the prompt and lawful removal of unauthorised encampments, including the use of police powers under Section 61 or 62 of the Criminal Justice & Public Order Act 1994 where:

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i. Local amenities are deprived to communities or there is significant impact on the environment.

This could include, for example, forming an encampment on any part of a recreation ground, public park, school field, village green, or depriving the public use of car parks. The fact that other sections of the community are being deprived of the amenities must be evident before action is taken.

ii. There is local disruption to the economy.

Local disruption to the economy would include forming an encampment on a shopping centre car park, or in an industrial estate, if it disrupts workers or customers, or agricultural land, if this results in the loss of use of the land for its normal purpose. This may not include situations where the facilities are available for use but people choose not to do so due to fear or stereotyping of those in the encampment.

iii. There is other significant disruption to the local community or environment.

This might include where other behaviour, which is directly related to those present at an encampment, is so significant that a prompt eviction by police becomes necessary, rather than by other means.

iv. There is a danger to life.

An example of this might be an encampment adjacent to a motorway, where there could be a danger of children or animals straying onto the carriageway.

v. There is a need to take preventative action.

This might include where a group of trespassers have persistently displayed anti-social behaviour at previous sites and it is reasonably believed that such behaviour will be displayed at this newly established site.

10.2 The mere presence of an encampment without any aggravating factors should not normally create an expectation that police will use eviction powers. This should be communicated to the public, landowners, local authorities, and other agencies. If it is not deemed lawful and appropriate to use police powers the Local Policing Superintendent will update the FDMM of this decision for ratification. Police should support the local authority by providing details of the initial site assessment to the local authority SPOC as soon as possible and when able within 24 hours of the visit. This will assist the local authority in providing their response to the welfare of those at the encampment, local community, and assist in their decision making to implement Section 77 of the Criminal Justice and Public Order Act.

10.3 In all cases, as stated above, relevant Human Rights processes must be applied to all decisions made to ensure that it is necessary and proportionate to use the powers. Section 61 Criminal Justice & Public Order Act relies upon reasonable steps being taken, by or on behalf of the landowner, to ask trespassers to leave in every case before police powers can be used.

10.4 Keep accurate records of the entire police operation. **Give the direction to leave both verbally and in writing using the F041d.** The notice should be signed an officer of the rank of Inspector, and should include the reasons for the direction. When issuing a direction the use of evidence **gathering** teams can be considered to record both the verbal direction and service of notices.

10.5 Before giving a direction under Section 61, the Inspector must have regard to his/her ability to carry out a policing operation, should the trespassers not comply with the direction to leave. The following lists a number of contingencies to consider;

- Sufficient officers to be capable of supervising the removal of the trespassers and/or their arrest.
- There must be a plan of what to do with vehicles seized under Section 62, and also unroadworthy vehicles removed from the highway. Recovery vehicles on stand-by would be a practical contingency.
- Local authority officials and Social Services need to be involved in relation to re-housing elderly persons, families or children if necessary, all of whom are vulnerable and may be related to persons involved in the operation.
- Equipment may be required to deal with animals and the RSPCA / dog wardens may be required to cater for trespassers animals.

10.6 The decision to use Section 61 is an operational policing one. In considering whether or not to use these powers, officers will carry out an appropriate assessment and consider the following guidance in making decisions:

Classification	Information
Land Use	The use of land by the local community will have a significant impact on a decision to use Section 61 powers
Primary Land	<p>The Force has identified certain land uses, where the tolerance of an unauthorised encampment, would have a substantial impact upon the quality of life and enjoyment of property, of the settled community, in the immediate vicinity of the trespass. This land will be referred to as 'Primary Land'.</p> <p>Where there is an unauthorised encampment on Primary Land which meets the criteria set out within the CJPO Act, there will be a presumption in favour of the use of Section 61 powers, subject to considerations of threat, harm, risk (including vulnerability) of those trespassing.</p> <p>Primary Land will include:</p> <ul style="list-style-type: none"> • School grounds, car parks or playing fields (especially in term time)

	<ul style="list-style-type: none"> • Recreation grounds and public playing fields • Cemeteries • Grounds of places of worship • Hospital grounds • Hospice grounds • Doctor's surgery carparks
<p>Secondary Land</p>	<p>Where the unauthorised encampment is sited on land other than Primary Land, there shall be a general presumption against the use of Section 61, and the utilisation of Ss. 77 and 78 or other legislative powers. However, this can be rebutted if prevailing circumstances make the use of Section 61 appropriate.</p> <p>Factors to take into account when making this decision should include:</p> <ul style="list-style-type: none"> • Is eviction using Section 61 a proportionate response? • If Section 61 is used, could the subjects then take up residence on more sensitive land? • Unacceptable behaviour by unauthorised campers, including criminal activity that cannot be controlled by means other than eviction • Significant disruption to the life of the surrounding community e.g. encampments on sporting grounds in season • Serious breaches of the peace or disorder caused by the encampment • Traffic hazards • Public health risks • Serious environmental damage • Immediate proximity to other sensitive land uses (e.g. hospitals, nursing homes, places of worship)

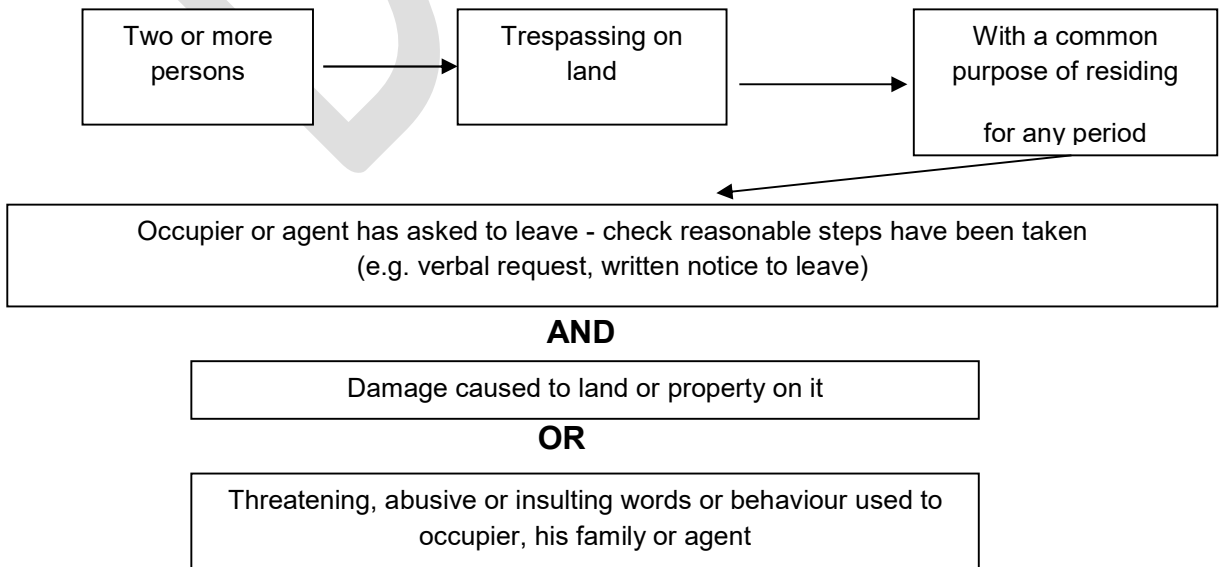
	<ul style="list-style-type: none">• Significant adverse impact on commercial activities <p>The simple fact that certain individuals within an unauthorised encampment are acting in a criminal or antisocial manner, does not necessarily make it appropriate to evict everyone on that particular site.</p>
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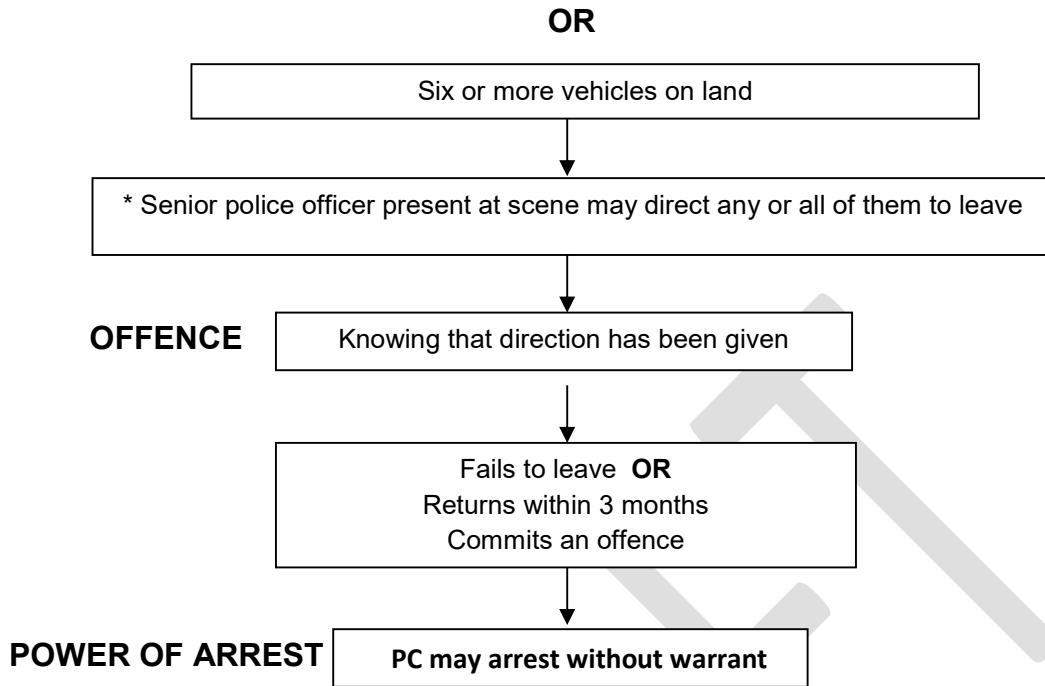
11 Use of Body Worn Video

- 11.1 Body Worn Video should be deployed onto all unlawful sites wherever practicable and available. Footage should be obtained of all vehicles, caravans, persons and animals on the site with a view to gathering intelligence and obtaining evidence for any potential offences committed.
- 11.2 Any video footage obtained should be marked as evidential when the camera is returned to its docking station. The footage should be stored under the STORM reference number and labelled as "Unlawful Traveller Site". This footage can then be used as evidence of any later breach of sec 61 or sec 77 eviction procedures.
- 11.3 The community Inspector for the relevant geographical area should then be made aware of the footage so that partner agencies can be notified.

12 Police Powers

- 12.1 Direction to leave land under Section 61 of the Criminal Justice and Public Order Act 1994. This power may be exercised where the Senior Police Officer present at the site reasonably believes that:





Note: Vehicle includes parts of vehicles and caravans whether or not fit to use.

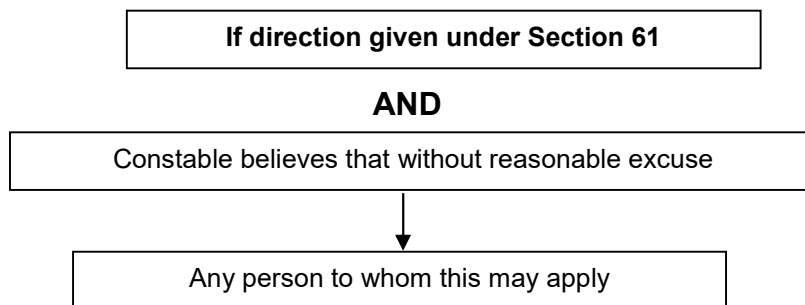
* The Senior police officer giving the direction must ensure that the time given by the landowner for the trespassers to leave has expired before serving the S.61 Notice.

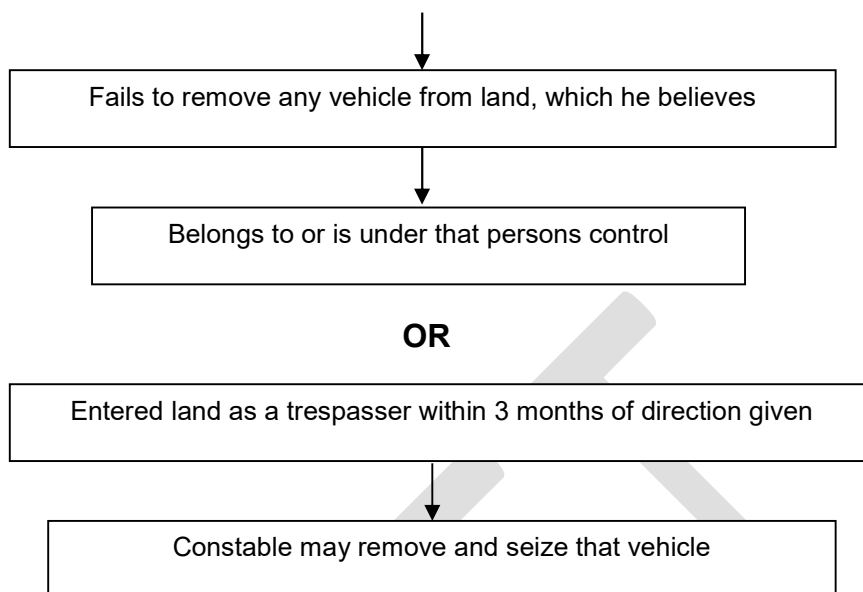
12.2 The 'Direction to Leave Land' **MUST** be given verbally as well as with the service of the F041d.

12.3 It should be noted that only persons directed to leave and, who fail to do so, may be arrested. However, consideration must be given to the practicalities of arresting all such persons. For example, it may not be appropriate to arrest mothers with young children, children, the elderly, etc.

12.4 Operational guidance and practical considerations for the Senior Officer when giving directions under Section 61 is shown at section 6

12.5 Section 62 - Seizure of Vehicles





Section 62 allows the Police to impound vehicles only (which include caravans). As the majority of travellers' possessions are in their vehicles, i.e. their caravans, this creates complex problems in terms of property rights, housing and provision for children and others that live in the seized vehicle. Therefore, as a practical matter, removal of all vehicles may be considered undesirable. To overcome some of the difficulties, the Police should act in full consultation and co-operation with Local Authorities.

- 12.6 An order for repossession under the civil law will have the effect of completely clearing a site. Bailiffs acting to enforce a civil court order can simply remove the vehicles and any other property; therefore the civil remedy is seen as an effective solution.
- 12.7 Therefore, a land owner should, if able, pursue remedies initially in civil law, or by asking the Local Authority to use their wider powers under Section 77 and, on obtaining an order for repossession or removal, inform the local Divisional Commander accordingly. Consideration will then be given to the need for a Police presence at the time repossession occurs to prevent a breach of the peace.

13 Local Authority Powers

13.1 Section 77 of the Criminal Justice and Public Order Act 1994. Section 77 enables Borough, District and County Councils to direct persons residing in vehicles on:

- Land forming part of a highway,
- Unoccupied land, or
- Occupied land without consent of the occupier,

The authority may give a direction that those persons and any others with them are to leave the land and remove the vehicle or vehicles and any other property they have with them on the land.

Bedfordshire has three Unitary Authorities, Bedford Borough, Central Bedfordshire and Luton Borough Councils.

- 13.2 If they fail to leave, the Authority can apply for a court order to enforce the direction and seize vehicles and other property. Local Authorities are obliged to enquire into the welfare needs of the group before using their powers.

14 Highway Land

- 14.1 Section 61 cannot generally be used on highway land; therefore encampments on highways should be dealt with under other legislation if applicable.

- 14.2 With regard to highway land the following additional criteria should also be considered:

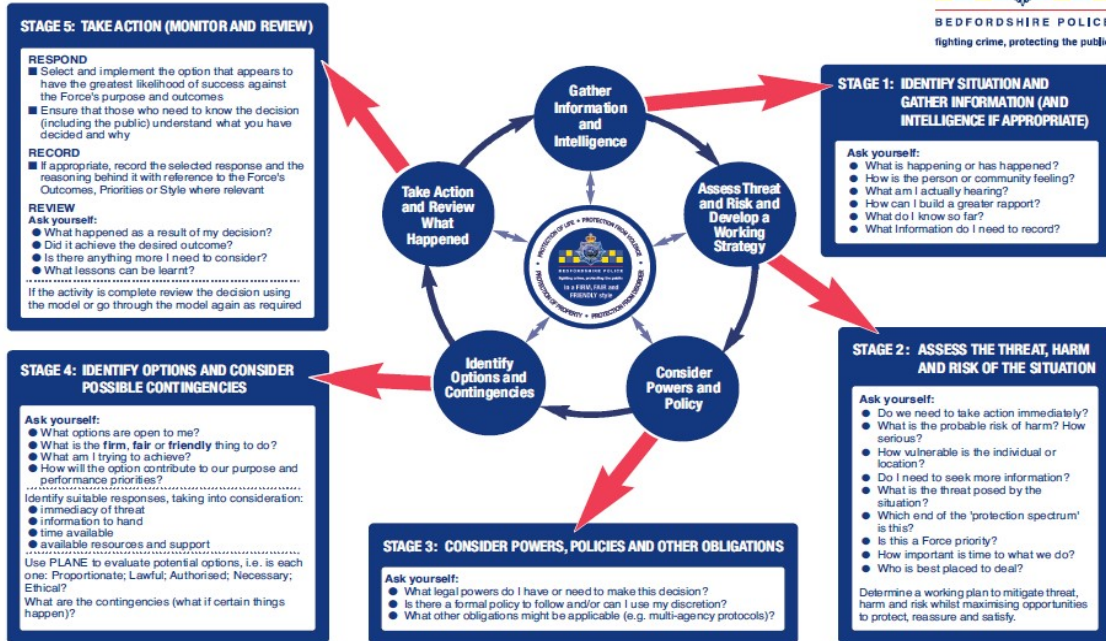
- Whether there is substantial obstruction of the highway.
- Whether the encampment is causing problems of highway safety.
- Whether there is a risk to public health.
- Whether the encampment has increased, or is likely to increase above 6 vehicles.
- Whether there is a risk that an encampment will spread to other land.
- Whether by reasons of the length of time over which an encampment continues, there is a risk of its permanent establishment in the neighbourhood.
- Whether special legal reasons apply, such as covenants to keep paths clear.

15 Decision Making

- 15.1 Officers and Staff are reminded that the Bedfordshire Decision Making Model has been designed to assist in effective decision making.

- 15.2 Officers should also use the THRIVE to determine proportionate responses in their decision making.

BEDFORDSHIRE POLICE DECISION MAKING MODEL



16 Communications/Implementation Plan

16.1 This policy / SOP will be communicated to all staff and be available with contact and communication details for other statutory authorities departments, eg relevant council departments, to enable an effective partnership approach to be taken when dealing with encampments.

17 Freedom of Information.

Suitable for External Publication. Yes

Exempted Paragraphs	Reason for Exemption

18 Equality Impact Assessment

18.1 The equality impact assessment for this document is provided below.

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Name of proposal to be assessed	R012 Dealing with Unauthorised Encampments	Date of Assessment	04/11/2016
Is this a policy or a SOP?	Policy	Person(s) responsible for assessment	ACC Colbourne
Designation: Medium			
1. Briefly describe the aims, objectives and purpose.	19 <u>To be responsive to the needs of all sections of the community, settled or transient, and treat them fairly and equally in accordance with the law.</u>		
2. Are there any associated objectives? Please explain.	<p>To uphold people's human rights in compliance with the provisions of the Human Rights Act 1998, in particular Articles 3, 8 and 14. However any infringements of those rights will only be considered when absolutely necessary, backed by law and in proportion to the issues giving cause for concern, for the greater good of the majority of the whole community and after having taken all prevailing circumstances into account.</p> <p>To work in partnership with Local Authorities, through jointly agreed protocols, to resolve issues and incidents associated with unauthorised encampments. Divisional Commanders will appoint liaison officers for that purpose. The Local Authorities' lead role in the removal of trespassers from land under Section 77 of the Criminal Justice and Public Order Act 1994 is recognised.</p> <p>To use its powers under Sections 61 and 62 of the Criminal Justice and Public Order Act 1994, to remove an encampment and seize vehicles in appropriate circumstances when all relevant conditions are met. As a matter of Force Policy the decision to use Police powers rests with the senior Police Officer present, who must at least be of the rank of Inspector.</p>		
3. Who is intended to benefit and in what way?	Police, partners and all sections of the community, settled or transient.		

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4. What outcomes are wanted?	To be responsive to the needs of all sections of the community, settled or transient, and treat them fairly and equally in accordance with the law.	
5. What factors/forces could contribute/detract from the outcomes?	Failure to consider the needs of all sections of the community and failure to provide a proportionate, lawful and effective response.	
6. Who are the main stakeholders?	Police, partners and all sections of the community, settled or transient.	
7. Are there concerns that there <u>could</u> be a differential impact on racial groups?	Yes	
What existing evidence (either presumed or otherwise) do you have for this?	Travellers are often the subject of the police response and as such the policy could have a differential impact on this racial group. Data from OIS demonstrates that this policy is used almost exclusively in relation to calls regarding unauthorised traveller encampments.	
8. Are there concerns that there <u>could</u> be a differential impact due to gender?	No	
What existing evidence (either presumed or otherwise) do you have for this?		
9. Are there concerns that there <u>could</u> be a differential impact due to Transgender?	No	
What existing evidence (either presumed or otherwise) do you have for this?		
10. Are there concerns that there <u>could</u> be a differential impact due to disability?	No	
What existing evidence (either presumed or otherwise) do you have for this?		
11. Are there concerns that there <u>could</u> be a differential impact due to sexual orientation?	No	
What existing evidence (either presumed or otherwise) do you have for this?		
12. Are there concerns that there <u>could</u> be a differential impact due to age?	No	
What existing evidence (either presumed or otherwise) do you have for this?		

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13. Are there concerns that there <u>could</u> be a differential impact due to religion and belief?		No
What existing evidence (either presumed or otherwise) do you have for this?		
14. Are there concerns that there <u>could</u> be a differential impact due to dependants/caring responsibilities?		No
What existing evidence (either presumed or otherwise) do you have for this?		
15. Could the differential impact identified in 8 – 14 amount to a potential adverse impact?		Yes
What existing evidence (either presumed or otherwise) do you have for this?	The fact that this policy is used almost exclusively in relation to calls regarding unauthorised traveller encampments gives rise to the potential for adverse impact in this policy.	
16. Can the impact be justified on grounds of promoting equality of opportunity for one group? Or any other reason?		Yes
It can be justified on the grounds that it supports the proportionate and impartial upholding of the law in relation to sections 61-62 Criminal Justice and Public Order Act 1994 (Police Powers) and Section 77 of the Criminal Justice and Public Order Act 1994 (Local Authority Powers)		
17. Should this proceed to a full impact assessment? If yes, proceed to the EIA Part Two.		No
18. If No, are there any changes required to improve it around the equality agenda?		No changes required.

Approved by Author Date: 04/11/2016

Approved by Sponsor Date: 04/11/2016

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