



Notice of a public meeting
Decision Session - Executive Member for Culture, Leisure & Tourism

To: Councillor Ayre (Executive Member)

Date: Monday, 28 November 2016

Time: 3.30 pm
Please note change of time from 4.30pm

Venue: The Craven Room - Ground Floor, West Offices
(G048)

AGENDA

Notice to Members – Post Decision Calling In:

Members are reminded that, should they wish to call in any item* on this agenda, notice must be given to Democratic Services by **4:00 pm on Wednesday 30 November 2015.**

*With the exception of matters that have been subject of a previous call in, require Full Council approval or are urgent which are not subject to the call-in provisions. Any called in items will be considered by the Corporate and Scrutiny Management Policy and Scrutiny Committee.

Written representations in respect of items on this agenda should be submitted to Democratic Services by **5.00 pm on Thursday 24 November 2016.**

1. Declarations of Interest

At this point in the meeting, the Executive Member is asked to declare:

- any personal interests not included on the Register of Interests
- any prejudicial interests or
- any disclosable pecuniary interests

which they may have in respect of business on this agenda.

- 2. Minutes** (Pages 1 - 2)
To approve and sign the minutes of the Decision Session held on 23 September 2016.

- 3. Public Participation**
At this point in the meeting, members of the public who have registered their wish to speak at the meeting can do so. The deadline for registering is at **5.00 pm on Friday 25 November 2016**.

Members of the public may register to speak on :-

- an item on the agenda
- an issue within the Executive Member's remit;

Filming, Recording or Webcasting Meetings

Please note this meeting will be filmed and webcast and that includes any registered public speakers, who have given their permission. This broadcast can be viewed at <http://www.york.gov.uk/webcasts>.

Residents are welcome to photograph, film or record Councillors and Officers at all meetings open to the press and public. This includes the use of social media reporting, i.e. tweeting. Anyone wishing to film, record or take photos at any public meeting should contact the Democracy Officer (whose contact details are at the foot of this agenda) in advance of the meeting.

The Council's protocol on Webcasting, Filming & Recording of Meetings ensures that these practices are carried out in a manner both respectful to the conduct of the meeting and all those present. It can be viewed at: http://www.york.gov.uk/download/downloads/id/11406/protocol_for_webcasting_filming_and_recording_of_council_meetings_20160809.pdf

- 4. National Trading Standards and eCrime Team Update**
(Pages 3 - 28)
This report updates the Executive Member on the activities of the National Trading Standards Regional Scambuster Team and National Trading Standards eCrime, hosted by City of York Council (Scambusters) and seeks approval for an updated Enforcement Policy for investigations carried out by Scambusters.

5. Urgent Business

Any other business which the Executive Member considers urgent under the Local Government Act 1972.

Democracy Officer:

Judith Betts

Contact

- Telephone No: (01904) 551078
- Email: judithbetts@york.gov.uk

For more information about any of the following please contact the Democratic Services Officer responsible for servicing this meeting:

- Registering to speak
- Business of the meeting
- Any special arrangements
- Copies of reports and
- For receiving reports in other formats

Contact details are set out above.

This information can be provided in your own language.

我們也用您們的語言提供這個信息 (Cantonese)

এই তথ্য আপনার নিজের ভাষায় দেয়া যেতে পারে। (Bengali)

Ta informacja może być dostarczona w twoim własnym języku. (Polish)

Bu bilgiyi kendi dilinizde almanız mümkündür. (Turkish)

یہ معلومات آپ کی اپنی زبان (بولی) میں بھی میا کی جاسکتی ہیں۔ (Urdu)

 (01904) 551550

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City of York Council

Committee Minutes

Meeting	Decision Session - Executive Member for Culture, Leisure & Tourism
Date	23 September 2016
Present	Councillor Ayre (Executive Member)
In Attendance	Councillor Fenton

12. Declarations of Interest

At this point in the meeting, the Executive Member was asked to declare if he had any personal, prejudicial or disclosable pecuniary interests not included on the Register of Interests that he might have in respect of business on the agenda. He did not declare any interests.

13. Minutes

Resolved: That the minutes of the decision session held on 22 July 2016 be approved and then signed by the Executive Member as a correct record.

14. Public Participation

It was reported that there had been no registrations to speak at the meeting under the Council's Public Participation Scheme. However the Executive Member reported that he had received a written submission from Councillor Reid on behalf of all three Ward Councillors for Dringhouses and Woodthorpe which he read out.

The submission stated that all the Councillors were very supportive of this proposal and advised that the reinvigorated Friends Group were now managing the pond well, had addressed some long standing issues and it had now become a very pleasant place to visit and spend time at and it looked well cared for. This had helped to discourage some of the anti social behaviour and vandalism that had happened in the past. Councillor Reid expressed the view that granting the lease would help the Group pursue its programme to improve the area and manage the fishing more effectively. Representatives of the Friends Group attended Ward Team meetings, were part of the community and were very supportive of other community groups and she urged the Executive Member to grant the lease.

15. Review of the Management of Chapman's Pond

The Executive Member considered a report which proposed transferring the management of the Chapman's Pond site to the Friends of Chapman's Pond on a trial basis to improve the long-term care of the site.

The Operations Manager- Public Realm, informed the Executive Member that the site had two principal uses: as a general recreation and dog walking area; and as a fishing pond. The community had been divided among those two interests and in the past had not really cooperated with each other as much as they could have done. There was a core group of anglers who fished to a high standard but unfortunately there was a small number who had caused some anti social behaviour in the past including late night use, noise and occasional bonfires. He explained that over the last couple of years, officers had worked with both the Friends of Chapman's Pond and the anglers to bring them closer together and more recently an angling bailiff service had been created to oversee the fishing including when people fished and how they were fishing.

He stated that in order to move forward and recognise the work of both groups, they were recommending that a lease be offered to the Friends of Chapman's Pond for three years on a trial basis and to allow a small income to be generated from fishing which would be put back into the care of the site. He explained that charging for fishing would bring it in line with two other council ponds which were also managed by the community, nearby Mayfields on Tadcaster Road and Rawcliffe Lake.

The Executive Member acknowledged that a change in financial resources and raised interest from local communities had led to increased involvement and commitment from local communities in taking charge of council sites in their areas. He commended the work of officers in bringing the two groups together, and the work of the fishermen and Friends of Chapman's Pond and the assistance of Ward Councillors.

Resolved: That the Friends of Chapman's Pond be granted a three year lease to manage the site.

Reason: To ensure that site continues to improve as a desirable place for recreation and its management remains sustainable.

Cllr N Ayre, Executive Member, Culture, Leisure & Tourism
[The meeting started at 3.30 pm and finished at 3.35 pm].



Decision Session: Executive Member Culture, Leisure and Tourism, 28 November 2016

Report of the Corporate Director – Economy and Place

National Trading Standards Scambuster and eCrime Team Update

Summary

1. To update the Executive Member on the activities of the National Trading Standards Regional Scambuster Team and National Trading Standards eCrime Team hosted by City of York Council (Scambusters).
2. To seek the approval of the Executive Member for an updated enforcement policy for investigations carried out Scambusters.

Background

3. A National Audit Office report published in 2011 identified a 'gap' in the enforcement of consumer protection legislation between the work carried out by local authority trading standards services and the 'national work' carried out by the Office of Fair Trading. The report concluded that there was not enough emphasis on complex investigations of rogue trading activities impacting on two or more local authorities.
4. The Government decided upon a new approach to enforcement and announced that sole responsibility for enforcement of consumer protection legislation would pass to local authorities under a new structure. The Office of Fair Trading was closed in 2013 and its responsibilities reassigned.
5. To oversee this new structure government established the National Trading Standards Board (NTSB). NTSB consists of regional senior trading standards officer representatives and a professional chair, Lord Toby Harris, They are tasked by the Department of Business, Innovation and Skills (now the Department for Business,

Energy & Industrial Strategy) with delivery of a number of high profile trading standards enforcement projects including the operation of regional enforcement teams (Scambusters) and a specialist facility to tackle on-line rogue trading (the National Trading Standards eCrime Team).

6. City of York Council are the host authority for the Yorkshire and the Humber Regional Scambuster Team and the investigation resource of the National Trading Standards eCrime Team (a partnership with North Yorkshire County Council who provide the digital forensic laboratory facility). These teams are grant funded on an annual basis by NTSB.
7. Scambusters are responsible for investigating cases of rogue trading that impact on a number of local authorities and their residents/ businesses. These are known as 'Level 2' (Regional) or 'Level 3' (National) cases. Level 2 cases are those matters that are tasked to the Scambuster team from a regional tasking group of representatives from local authority trading standards services in the Yorkshire and the Humber Region. Level 3 cases are now tasked to Scambuster teams from a national trading standards tactical tasking and coordinating group (NTG). NTG comprises of representatives from NTSB.
8. By their very nature investigations carried out by Scambusters are complex involving significant number of (often vulnerable) victims. Where prosecutions are taken the cases are invariably heard or tried in the Crown Court and often result in lengthy trials with multiple defendants. Annex A to this report provides a summary of cases that have been concluded since 1st April 2014 and those matters listed for trial up to 31st March 2018. A further 11 cases are under investigation. All current cases involve York victims or offences committed in the council's area and as a consequence legal proceedings are commenced at York Magistrates Court.

Proceeds of Crime

9. Scambusters have the capacity to carry out financial investigations under the Proceeds of Crime Act 2002 (POCA). These are either carried out by accredited financial investigators in the team or (in the case of the larger cases) in partnership with the NE Regional Asset Recovery Team based with West Yorkshire Police.

10. Under the terms of the council's grant agreement with NTSB 50% of any POCA receipts have to be returned to NTSB. In accordance with an earlier decision 25% is paid to the regional trading standards group (who support the activities of Scambusters e.g. by funding 1 FTE financial investigator in the team) and 25% is retained by the council for spending on local issues. Since 1st April 2014 the council has received £129K from POCA confiscation hearings relating to Scambuster cases.
11. As part of ongoing cases and investigations, in appropriate circumstances, Scambusters restrain (i.e. freeze) the assets of suspects and defendants pending the outcome of any prosecution and subsequent confiscation proceedings. The value of assets currently 'under restraint' for cases being prosecuted is estimated at over £15m.

Enforcement Policy

12. Cases referred to the Scambusters can be very different to those matters dealt with by the council's trading standards service. Referred cases are often ones where local authorities have tried a progressive approach to enforcement and failed or where the illegal activity is clearly fraudulent.
13. Following the first Level 3 referral from NTG officers sought Counsel's opinion on the 'fitness for purpose' of the council's enforcement policy that dealt with trading standards to encompass the investigations and legal proceedings of cases dealt with by Scambusters. Her advice was that consideration should be given to drafting a separate policy for the Scambusters where prosecution was a likely action to be taken.
14. An enforcement policy for Scambusters was approved by the Cabinet Member for Crime and Stronger Communities on 7th June 2013. This policy now requires updating to reflect charges to departmental terminology and a new directorate structure. A suggested updated enforcement policy is at Annex B.

Consultation

15. None.

Options

16.

Option 1

- To note the report and approve the updated enforcement policy in Annex B.

Option 2

- To note the report but not to approve the updated enforcement policy in Annex B.

Analysis

17. Option 1 will reduce the possibility of legal challenge that Scambusters have operated outside the scope of an approved enforcement policy.

18. Option 2 will increase the risk of legal challenge.

Council Plan

19. Scambusters support the council priority of a focus on frontline services. The purpose of the team is to protect residents from harm and reduce the risk of harm through the targeting of enforcement action at the most significant areas of consumer detriment and rogue trading practices seeking to exploit vulnerable consumer groups.

Implications

20.

- **Financial** None

- **Human Resources (HR)** None
- **Equalities** None
- **Legal**

21. Any decision to prosecute or take other enforcement action must be made in accordance with the enforcement policy and having regard to the code for crown prosecutors. A failure to have regard to these documents on a prosecution decisions could lead to the defendant bringing “an abuse of process” application to defeat the prosecution.

22. Under the Council’s Constitution legal proceedings can only be instituted in accordance with an approved enforcement policy or with the approval of the Assistant Director of Governance and ICT.

- **Crime and Disorder** None
- **Information Technology (IT)** None
- **Property** None
- **Other** None

Risk Management

23. There are no corporate risks associated with this report.

Contact Details

Author:

Colin Rumford
Head of Regional
Investigations
Ext. 1502

Chief Officer Responsible for the report:

Mike Slater
AD Planning and Sustainable
Development
Ext. 1300

**Report
Approved**

Date 18
November
2016

Specialist Implications Officer(s)

Andrew Docherty, Assistant Director Legal and Governance

Wards Affected: *List wards or tick box to indicate all*

All

For further information please contact the author of the report

Annexes:

Annex A – Completed and Pending Court Cases

Annex B – Draft Enforcement Policy

Annex C – Scambusters Enforcement Policy

Abbreviations:

National Trading Standards Board (NTSB)

Proceeds of Crime Act (POCA)

National Trading Standards Tactical Tasking and Coordinating Group
(NTG)

North Yorkshire County Council (NYCC)

Annex A

Completed Prosecutions and Pending Court Cases**Table 1: Scambuster Prosecutions 1st April 2014 to 31st August 2016**

Operation	Summary	Outcome
Whisky	On-line bogus recruitment and CRB checking scam. No actual jobs and paid for CRB checks not carried out.	Sole trader (guilty plea). 6 months imprisonment, suspended for two years. 180 hours unpaid community work. £2,466 compensation to victims and £5,048.prosecution costs.
Digger	On –line airline tickets scam. Paid for tickets not provided.	Company director and company (guilty pleas). Company fined £1,000. Director given 12 Community Order, 150 hours unpaid work, disqualified from acting as a company director for 5 years and ordered to pay £9,407 compensation to victims.
Belle	Council tax re banding scam. Fee paid to have a homeowner's property re banded. No or minimal work carried out. Over 1,600 complaints received by trading standards with an estimated value of the fraud of over £250K.	Sole trader (guilty plea) and two employees (convicted following a trial). Sole trader imprisoned for 5 years and 10 months and disqualified form acting as a company director for 13 years. One employee imprisoned for 2 years the other 6 months imprisonment suspended for 2 years.

Hopsack	Confiscation proceedings under the Proceeds of Crime Act against 6 defendants who had previously convicted of operating a second hand car dealership defrauding consumers.	Total criminal benefit determined by Leeds Crown Court to be £26,565,449 and the Judge ordered the total to be repaid by the defendants as £6,552,302. Of this the 'main' defendant' was ordered to repay £6,203,025 and in addition pay £44,430 compensation to his victims. The defendants' company was fined £250K. (The main defendant failed to pay all of his confiscation order and was sentenced to a further 6 years imprisonment in default).
Hector	On-line business grants scam. Victims were told a 70% grant was available for website development (if they paid 30% of the cost). No grant and no work carried to justify the monies paid.	Sole trader (guilty plea). 18 months imprisonment suspended for two years, 300 hours of unpaid work, £8,776 prosecution costs and £13,255 compensation to be repaid to victims.
Krypton	Rogue builders. Aggressive selling, pressurising vulnerable consumers into paying for unnecessary work,	Father and son (guilty pleas), Father 3 years imprisonment, disqualified as acting as a company director for 12 years and ordered to pay £10,000 compensation to one of his victims. Son 80 hours of unpaid work and £500 prosecution costs.

Nail	Itinerant drive tarmacing gang targeting vulnerable elderly home owners. Overcharging and carrying out unnecessary and very poor quality work.	Father and son (guilty pleas). Each sentenced to 2 years imprisonment. Father also ordered to pay £10,000 prosecution costs and £3,950 compensation to their victims.
Angel	Employees of a kitchen retail business (operating under numerous business names from accommodation addresses). Misrepresentation as to the quality of the product, standards of customer service and breaches of trade marks legislation. Over 1,700 complaints with consumer detriment of over £2.6m.	6 defendants (one guilty plea, others found guilty following 5 month trial at Manchester Crown Court). All imprisoned (18 months, 15 months, 12 months, 9 months, 9 months and 6 months). All to face confiscation proceedings under the Proceeds of Crime Act.

Table 2: Scambuster Cases Before Crown Court to 31st March 2018

Operation	Summary	Court/Trial Estimate
Cleo 2 (Part 1)	Copycat websites. First trial of 4 defendants on single charge of conspiracy to defraud. 494 witnesses. Assets restrained pending any confiscation proceedings.	Teesside Crown Court/ September 2016 for 12 weeks
Aquarius 2	A 'revisit' to an old Proceeds of Crime confiscation order to apply for the defendant to make additional 'payback'	Wood Green Crown Court / October 2016 1 day hearing
Smudge	Roofing repair/insulation business targeting vulnerable elderly consumers. Defendants are 3 company directors and contractor. Overcharging and carrying out unnecessary work. Assets restrained pending any confiscation proceedings	Leeds Crown Court / October 2016 for 10 weeks
Flip	Medical bed supplier. Defendants are company secretary (husband) and sole director (wife). Falsely purporting to carry out a survey (rather than selling) and aggressive commercial practices targeted at vulnerable consumers. Assets restrained pending any confiscation proceedings	Leeds Crown Court / January 2017 for 1 week for wife only(husband has entered guilty pleas)

Dougal (Part 1)	Copycat websites. First trial of 4 defendants on single charge of conspiracy to defraud. 428 witnesses. Assets restrained pending any confiscation proceedings.	Teesside Crown Court / April 2016 for 12 weeks (1 defendant has entered a guilty plea)
Cindy	Copycat 'passport' website. Various fraud offences. Company director and company defendants. Assets restrained pending any confiscation proceedings.	Leeds Crown Court / June 2017 for 6 weeks
Funder	Vacuum cleaning repair company. 3 defendants. Cold calling householders making false claims about necessary repairs and aggressive practice to sell new overpriced cleaners to mainly elderly vulnerable consumers. Assets restrained pending any confiscation proceedings.	Leeds Crown Court / June 2017 for 4 weeks
Angel 2	3 further employees of the kitchen business in Operation Angel. Also confiscation proceedings against convicted defendants and the 'absent' proprietor of the business who absconded in December 2013. Assets restrained pending any confiscation proceedings	Manchester Crown Court / November 2017 for 6 weeks with various preliminary hearings.

Cleo 2 Part 2/ Dougal and Dougal 2	13 additional defendants/ charges have been 'put on' hold pending the outcomes of linked proceedings.	Teesside Crown Court / Awaiting listing dates.
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Annex B



**National Trading Standards
Yorkshire and the Humber Regional Scambuster Team and
National Trading Standards eCrime Team
Enforcement Policy**

This document is the enforcement policy for the National Trading Standards Yorkshire and the Humber Regional Scambuster Team and National Trading Standards eCrime Team (Scambusters) hosted by City of York Council on behalf of the National Trading Standards Board (NTSB)

The purpose of Scambusters is to tackle the scams and complex cases of fraud perpetrated on a regional and national basis in an effective way that is not readily achievable by individual local authorities. Scambusters investigate individual cases and practices referred to them by local authority trading standards services and through the tasking arrangements of NTSB.

The purpose of Scambusters is not to provide advice, information or carry out inspections of regulated businesses. Scambusters are charged with taking on major investigations, and in appropriate cases, bringing them to a just conclusion through the courts using both criminal and civil sanctions.

Scambusters will have regard to The Code for Crown Prosecutors issued by the Director of Public Prosecutions, the Regulators' Code and other relevant codes including those concerned with the investigation of offences.

Annex B

Scambusters will take appropriate formal enforcement action in cases concerning fraud, significant unlawful consumer detriment, unlawful exploitation of vulnerable consumers groups, intellectual property crime and any other matter that the head of regional investigations considers necessary within the scope of the purpose of Scambusters. For the purposes of this policy formal enforcement action includes prosecution, civil action, confiscation proceedings or the issue of a simple caution.

Formal enforcement action under this policy will be in the public interest and will:

- aim to change the behaviour of the offender;
 - aim to eliminate any financial gain or benefit from crime/non-compliance;
 - be responsive and consider what is appropriate for the particular offender and regulatory issue, which can include punishment and the public stigma that should be associated with a criminal conviction;
 - be proportionate to the nature of the offence and the harm caused;
 - aim to restore the harm caused by the crime/regulatory non-compliance, where appropriate;
- and
- aim to deter future offending/non-compliance.

All enforcement activity undertaken under this policy will have regard to the Human Rights Act 1998 and Equalities Act 2010.

Signed:

Neil Ferris

Corporate Director – Economy and Place

On behalf of City of York Council

21st November 2016

Annex B

This information can be provided in your own language.

我們也用您們的語言提供這個信息 (Cantonese)

Ta informacja może być dostarczona w twoim własnym języku. (Polish)

Bu bilgiyi kendi dilinizde almanız mümkündür. (Turkish)

 01904 551550

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SECTION 1: CIA SUMMARY
Community Impact Assessment: Summary
1. Name of service, policy, function or criteria being assessed:

The updated enforcement policy for the National Trading Standards Regional Scambuster Team and National Trading Standards eCrime Team hosted by City of York Council (Scambusters).

2. What are the main objectives or aims of the service/policy/function/criteria?

To provide the legal framework for decisions taken to take formal enforcement action by Scambusters. There is no change to the existing policy but it requires updating to reflect the recent changes to the Council's directorate structure.

3. Name and Job Title of person completing assessment:

Colin Rumford – Head of Regional Investigations

4. Have any impacts been Identified? (Yes/No)

Yes

Community of Identity affected:

Age

Summary of impact:

Enforcement action will be taken in cases involving vulnerable consumer groups and the policy impacts on victims and perpetrators. The work of Scambusters is highlighted on the National Trading Standards website

<http://www.nationaltradingstandards.uk/>

All enforcement action has due regard to Equality and Human Rights legislation.

5. Date CIA completed: 14th November 2016
6. Signed off by:

Colin Rumford

7. I am satisfied that this service/policy/function has been successfully impact assessed.

Name:

Position:

Date:

8. Decision-making body:

Date:

Decision Details:

Executive Member Culture, Leisure and Tourism		
<p>Send the completed signed off document to ciasubmission@york.gov.uk It will be published on the intranet, as well as on the council website.</p> <p>Actions arising from the Assessments will be logged on Verto and progress updates will be required</p>		

Community Impact Assessment (CIA)

Community Impact Assessment Title:

The enforcement policy for the National Trading Standards Regional Scambuster Team and National Trading Standards eCrime Team hosted by City of York Council (Scambusters).

What evidence is available **to suggest that the proposed service, policy, function or criteria could have a negative (N), positive (P) or no (None) effect** on quality of life outcomes? (Refer to guidance for further details)

Can negative impacts be justified? **For example: improving community cohesion; complying with other legislation or enforcement duties; taking positive action to address imbalances or under-representation; needing to target a particular community or group e.g. older people.** NB. Lack of financial resources alone is NOT justification!

Community of Identity: Age

Evidence	Quality of Life Indicators	Customer Impact (N/P/None)	Staff Impact (N/P/None)
<p>The policy highlights that formal enforcement action will be taken in cases involving unlawful exploitation of vulnerable consumers groups.</p> <p>Officers receive training for specialist interviewing techniques to achieve best evidence from vulnerable victims.</p>	Longevity, Health and Standard of Living	P	P

Details of Impact	<i>Can negative impacts be justified?</i>	Reason/Action	Lead Officer	Completion Date
Investigations involving elderly consumers will be prioritised.	N/a	To ensure resources are directed at appropriate investigations.	Colin Rumford	14/11/2016

Community of Identity: Carers of Older or Disabled People

Evidence	Quality of Life Indicators	Customer Impact (N/P/None)	Staff Impact (N/P/None)	
N/a	N/a	None	None	
Details of Impact	<i>Can negative impacts be justified?</i>	Reason/Action	Lead Officer	Completion Date
None		N/a	None	None

Community of Identity: Disability

Evidence	Quality of Life Indicators	Customer Impact (N/P/None)	Staff Impact (N/P/None)
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The policy highlights that formal enforcement action will be taken in cases involving unlawful exploitation of vulnerable consumers groups		Longevity, Health and Standard of Living	P	P
Officers receive training for specialist interviewing techniques to achieve best evidence from vulnerable victims.				
Details of Impact	Can negative impacts be justified?	Reason/Action	Lead Officer	Completion Date
Investigations involving consumers who are vulnerable by virtue of medical or mental conditions will be prioritised.		To ensure resources are directed at appropriate investigations.	Colin	14/11/2016

Community of Identity: Gender				
Evidence		Quality of Life Indicators	Customer Impact (N/P/None)	Staff Impact (N/P/None)
N/a		N/a	None	None
Details of Impact	Can negative impacts be justified?	Reason/Action	Lead Officer	Completion Date

None		N/a	None	None
Details of Impact	<i>Can negative impacts be justified?</i>	Reason/Action	Lead Officer	Completion Date

Community of Identity: Gender Reassignment				
Evidence		Quality of Life Indicators	Customer Impact (N/P/None)	Staff Impact (N/P/None)
N/a		N/a	None	None
Details of Impact	<i>Can negative impacts be justified?</i>	Reason/Action	Lead Officer	Completion Date
None		N/a	None	None

Details of Impact	<i>Can negative impacts be justified?</i>	Reason/Action	Lead Officer	Completion Date

Community of Identity: Marriage & Civil Partnership

Evidence		Quality of Life Indicators	Customer Impact (N/P/None)	Staff Impact (N/P/None)
N/a		N/a	None	None
Details of Impact	<i>Can negative impacts be justified?</i>	Reason/Action	Lead Officer	Completion Date
None		N/a	None	None
Details of Impact	<i>Can negative impacts be justified?</i>	Reason/Action	Lead Officer	Completion Date

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Community of Identity: Pregnancy / Maternity

Evidence		Quality of Life Indicators	Customer Impact (N/P/None)	Staff Impact (N/P/None)
Details of Impact	<i>Can negative impacts be justified?</i>	Reason/Action	Lead Officer	Completion Date
N/a		N/a	None	None
Details of Impact	<i>Can negative impacts be justified?</i>	Reason/Action	Lead Officer	Completion Date
None		N/a	None	None

Community of Identity: Race

Evidence		Quality of Life Indicators	Customer Impact (N/P/None)	Staff Impact (N/P/None)
N/a		N/a	None	None
Details of Impact	<i>Can negative impacts be justified?</i>	Reason/Action	Lead Officer	Completion Date
None		N/a	None	None
Details of Impact	<i>Can negative impacts be justified?</i>	Reason/Action	Lead Officer	Completion Date

Community of Identity: Religion / Spirituality / Belief				
Evidence		Quality of Life Indicators	Customer Impact (N/P/None)	Staff Impact (N/P/None)
N/a		N/a	None	None

Details of Impact	<i>Can negative impacts be justified?</i>	Reason/Action	Lead Officer	Completion Date
None		N/a	None	None
Details of Impact	<i>Can negative impacts be justified?</i>	Reason/Action	Lead Officer	Completion Date

Community of Identity: Sexual Orientation				
Evidence		Quality of Life Indicators	Customer Impact (N/P/None)	Staff Impact (N/P/None)
N/a		N/a	None	None
Details of Impact	<i>Can negative impacts be justified?</i>	Reason/Action	Lead Officer	Completion Date
None		N/a	None	None

Details of Impact	<i>Can negative impacts be justified?</i>	Reason/Action	Lead Officer	Completion Date

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