

ANGUS COUNCIL

NEIGHBOURHOOD SERVICES COMMITTEE – 28 MAY 2009

PROMOTING POSITIVE OUTCOMES:
NATIONAL AND LOCAL RECOMMENDATIONS REGARDING ANTI-SOCIAL BEHAVIOUR

REPORT BY DIRECTOR OF NEIGHBOURHOOD SERVICES

Abstract: This report outlines the recently launched guidance and framework from the Scottish Government entitled "Promoting Positive Outcomes: Working Together to Prevent Antisocial Behaviour in Scotland".

1. RECOMMENDATION

- 1.1 Members are asked to note the contents of the report, considering the defined national actions and local recommendations at appendix 1.

2. BACKGROUND

- 2.1 In February 2008, COSLA and the Scottish Government jointly undertook to review the current national antisocial behaviour policy in Scotland as framed by the Antisocial Behaviour etc (Scotland) Act 2004 and accompanying documents. This was led at a political level by Fergus Ewing, Minister for Community Safety and Councillor Harry McGuigan, COSLA Community Wellbeing and Safety Spokesperson and at the officer level by civil servants and a COSLA secondee working within the Scottish Government.
- 2.2 The framework for preventing anti-social behaviour in Scotland is the product of an inclusive, consensual, evidence led review of national policy. The ASB review was an open process with practitioners in police forces and local authorities consulted through in-depth interviews with the Scottish Government's Justice Analytical Services Division. In addition, early drafts of the proposed framework were widely available for comment, as well as written submissions from Local Government ASB/Community Safety practitioner networks and forums.
- 2.3 On 19 February 2009 the Scottish Government formally launched the new framework and guidance for tackling antisocial behaviour in our communities. It is owned and will be delivered by all of the key partners involved in tackling antisocial behaviour in Scotland. The guidance expresses the need for a shift of focus from solely using preventative measures to combat antisocial behaviour and towards protecting our communities by preventing anti-social behaviour from occurring in the first place. A full copy of the document entitled "*Promoting Positive Outcomes: Working Together to Prevent Antisocial Behaviour in Scotland*" is available for perusal in the members lounge and at www.scotland.gov.uk/Resource/Doc/264302/0079222.pdf.

3. CURRENT POSITION

- 3.1 The new ASB Framework has four themes, namely **prevention, integration, engagement and communication**. Within each of these themes COSLA and the Scottish Government have outlined a set of strategic aims, national actions, local recommendations and good practice examples.
- 3.2 The ASB framework will contribute to a wide range of other national policy agendas including all five strategic objectives of the Scottish Government and more specifically, the early years framework, criminal justice, economic development and wider community safety agendas.
- 3.3 The new framework is not about abandoning what went before but about being smarter about how the problem of antisocial behaviour is tackled. The framework does not repeal the use of Anti Social Behaviour Orders or any other legal measures as defined by the Antisocial Behaviour etc (Scotland) Act 2004. Indeed, Angus Community Safety Partnership will continue to utilise ASBOs and other enforcement methods in the considered and sparing fashion it has since the legislation was put in place. The main change signalled by the new framework is the change in emphasis.

3.4 The main tenets of this are:

- Rather than focusing on tackling the symptoms of the problem, we should be focusing on addressing the causes of the problem through preventative work;
- Rather than fight philosophical battles in a polarised debate about needs v. deeds; victim v. offender; individual v. community; and prevention v. intervention, we should be working together better to achieve shared outcomes;
- Rather than involving communities in an ad hoc and tokenistic fashion, we should be engaging them in a meaningful way in the development of local and national strategies and keeping them informed of progress
- Rather than allow scaremongering and negative stereotypes to go unchallenged, we should communicate better as partners to ensure positive, coordinated and evidence based messages are shared with the public.

3.5 **National Actions and Local Recommendations**

3.6 A set of 25 national actions and 25 local recommendations have been developed across the framework to respond to the findings of the review of national policy. These were approved by many partners of the review's ASB expert Advisory Group and the National Community Safety Strategic Group and by Scottish Ministers on 27 January 2009.

3.7 Both the national and local indicators are shown in Appendix 1. Members should note that Angus Community Safety Partnership is already well positioned to deliver the local actions as outlined in the table.

3.8 Most recently, the new Angus Community Safety Partnership Joint Services Team has come together under one roof in Forfar. The team comprises of staff from Angus Council, Tayside Police and Tayside Fire and Rescue. Working in close proximity in a shared base allows staff better joint working to improve community safety, tackle crime and antisocial behaviour, and provide support to victims.

3.9 The partnership has been progressive and forward thinking in already undertaking many of the actions which have been recommended. However, further work and development will be required in some areas to ensure full delivery.

3.10 **Outcomes and Reporting**

3.11 Success will no longer be measured solely through the number of times enforcement measures have been utilised. It is outcomes that matter to our communities and the high use of legal measures could be as likely to indicate failure as success. Prevention and effective intervention should be the primary focus and success will be judged on the outcomes which the approach delivers, not the inputs and processes used to deliver it.

3.12 ASB outcomes and targets will continue to be monitored through the Single Outcome Agreement process and the Angus Council Excelsis Performance Management System.

4. **FINANCIAL IMPLICATIONS**

4.1 There are no financial implications arising from this report.

5. **HUMAN RIGHTS IMPLICATIONS**

5.1 There are no human rights implications arising from this report.

6. **EQUALITIES IMPLICATIONS**

6.1 The issues dealt with within this report have been subject of considerations from the equalities perspective (as required by legislation). An equalities impact assessment is not required.

7. SINGLE OUTCOME AGREEMENT

- 7.1 This report contributes to the following local outcome(s) contained within the Single Outcome Agreement for Angus;
- Communities in Angus are safe secure and vibrant.

8. CONSULTATION

- 8.1 The Chief Executive, the Director of Corporate Services, the Head of Finance and the Head of Law and Administration have been consulted in the preparation of this report

9. CONCLUSION

- 9.1 The new ASB Framework has been developed as a joint process from start to finish between COSLA and the Scottish Government as part of the Concordat. The COSLA Wellbeing and Safety Executive group will monitor its implementation particularly in relation to any resource issues.
- 9.2 As previously stated, Angus Community Safety Partnership is well placed to deliver the recommendations of the new framework. Indeed it had already undertaken some of these recommendations prior to the framework noting them as local actions. Good practice within the partnership, such as a strong Strategic Assessment document has already been recognised by the Scottish Government and is utilised by the Scottish Police College in their analyst training.
- 9.3 This report also reflects upon the good work already being carried out by the Angus Community Safety Partnership in the field of antisocial behaviour prevention and resolution.

**RON ASHTON
DIRECTOR OF NEIGHBOURHOOD SERVICES**

NOTE: No background papers, as defined by Section 50D of the Local Government (Scotland) Act 1973 (other than any containing confidential or exempt information) were relied on to a material extent in preparing the above Report.

Hsg/NS/AMcK/ID

Anti Social Behaviour National Actions and Local Recommendations

NATIONAL PREVENTION		STATUS	
1.	<i>A Revised PIER Model:</i>	The Scottish Government, Convention of Scottish Local Authorities (COSLA) and the other national partners will promote a revised PIER Model with support and education at the centre.	<i>Guidance awaited from Scottish Government.</i>
2.	<i>Support with ASBOs:</i>	The Scottish Government will consult with key stakeholders during 2009 on the case for introducing a requirement that, at the time of applying for an ASBO, local authorities and registered social landlords must demonstrate, where the circumstances of the case require it, that an adequate support package has been offered to the offender.	<i>Further consultation to take place throughout 2009.</i>
3.	<i>Amendments to the 2004 Act and related legislation:</i>	The Scottish Government will consult with key stakeholders by the end of 2009 on amendments to the 2004 Act and related legislation which this review has identified as supporting local partners to achieve successful outcomes for communities.	<i>Consultation to take place and be completed by end 2009.</i>
4.	<i>Community Wardens:</i>	The Scottish Government, COSLA and other national partners will promote and support the work of community warden schemes across Scotland, to support their efforts in tackling ASB.	<i>Promotion and support for wardens service to be provided.</i>
5.	<i>Revised guidance:</i>	The Scottish Government, COSLA and the other national partners, will revise the guidance documents which currently support the 2004 Act by early 2010.	<i>Revised guidance to be produced by Scottish Government by early 2010.</i>
6.	<i>Local Data Collection:</i>	The Scottish Government, COSLA and other national partners will, by the end of 2009, develop a framework for collating local information on measures used to tackle ASB to inform national policy direction and local service planning.	<i>Scottish Government to develop a framework for collating local information to be developed and implemented by end of 2009.</i>
7.	<i>Further Research:</i>	The Scottish Government, COSLA and other national partners will develop a programme of research by summer 2009, which will be undertaken to support implementation of this Framework.	<i>Program of research to be developed by summer 2009 in support of implementation of ASB framework.</i>
INTEGRATION			
8.	<i>Guidance on Partnership Working:</i>	The Scottish Government, COSLA and other national partners, will produce shared strategic guidance on partnership working on ASB by the end of 2009.	<i>Shared Strategic Guidance of partnership working on ASB to be produced by end of 2009.</i>

9.	Guidance on Strategic Assessment:	The Scottish Government, COSLA and other national partners will produce shared guidance on the use of strategic assessments and other analytical tools by the end of 2009.	<i>Guidance on the use of strategic assessments and other analytical tools to be produced by the end of 2009</i> <i>Angus developing it second Community Safety Strategic assessment at present. Initial assessment currently being utilised as 'good practise example' nationally by Analysts Division of Scottish Police College.</i> <i>ARC GIS due to be implemented in the near future to assist with ASB problem profiling.</i>
10.	Guidance on Criminal Antisocial Behaviour Orders (CRASBOs):	The Scottish Government, in conjunction with COPFS and other partners, will publish guidance by the end of 2009 clarifying the procedure to be used to aid the drafting - and inform the granting- of criminal ASBOs by the courts.	<i>Guidance to be published by the end of 2009 providing clarity on the use of CrASBO's.</i>
11.	Review of Information Sharing:	The Scottish Government, COSLA and other national partners will, during 2009 review information sharing practice in relation to ASB, which will include considering the use of information sharing protocols (ISPs). They will, through further consultation, consider the potential role of other partners such as General Practitioners within ISPs.	<i>Review of Information sharing practise in relation to ASB this will include consultation</i>
12.	Housing Allocation Policy:	The Scottish Government will work with housing stakeholders to conduct a review of housing allocation issues during 2009, and expect to publish revised guidance for local authorities and Registered Social Landlords on allocations issues.	<i>Review of housing allocation issues to be carried out and revised guidance to be published.</i>
ENGAGEMENT			
13.	Training for Elected Members:	COSLA and the Improvement Service will provide training and support to new and existing elected members from summer 2009 to encourage them to engage and facilitate in their role as "Community Champions", new approaches for involving citizens and communities in addressing ASB.	<i>Training to be provided in relation to ASB for Elected members.</i>
14.	Participatory Budgeting Pilot:	The Scottish Government and COSLA will establish, by autumn 2009, a participatory budgeting pilot exercise across three CPP areas as part of the community empowerment agenda.	<i>Pilot exercise on participatory budgeting to be carried out.</i>
15.	Guidelines on Dispute Resolution:	The Scottish Government, COSLA and other national partners will consult, by autumn 2009, on the development of shared guidance aimed at encouraging local communities and agencies to build their capacity in addressing ASB problems through community engagement and empowerment activities.	<i>Guidance of Community Capacity building to address ASB problems to be developed by autumn 2009.</i>

COMMUNICATION			
16.	National Communications Strategy:	The Scottish Government, COSLA and other national partners will develop, by early 2010, a shared national ASB communications strategy from which all marketing and communications activity will fall.	<i>Communications Strategy in relation to National ASB activities to be developed by early 2010.</i>
17.	Media and Communications Network:	The Scottish Government, COSLA and other national partners will, by summer 2009, establish a Media and Communications Network to oversee the development of a national ASB communications strategy and help design, plan and coordinate national and local marketing and communications activity.	<i>Media and Communications network to be developed Nationally to assist with the development of an ASB Communication Strategy and coordinate local marketing and communication activity</i>
18.	National Policy Position Statements:	The Scottish Government, COSLA and other national partners will, by the end of 2009, produce a series of National Policy Position Statements to provide clarity to stakeholders and the public on key ASB issues and measures.	<i>National position and policy statements on ASB issues and measures to be provided by end of 2009.</i>
19.	Practitioner Support Services:	Scottish Government, in consultation with COSLA and other national and local partners, will, by autumn 2009, revamp central ASB practitioner support services to meet the changing needs of partners in the developing post-Concordat environment.	<i>Scottish Government to revamp central ASB practitioner support by autumn 2009.</i>
20.	Online Good Practice Database:	The Scottish Government, COSLA and other national partners will, by the end of 2009, create a shared online database of good practice examples to encourage the replication of successful approaches across the country.	<i>ASB good practise database to be shared online by end of 2009.</i>
21.	Presentation Plan for Centrally-Held Data:	The Scottish Government will work with COSLA and other national and local partners to agree, by the end of 2009, a new presentation plan for the release of information gathered centrally about local action and outcomes related to tackling ASB.	<i>Presentation plan regarding release of local actions and outcomes relating to tackling ASB to be developed by end of 2009.</i>
22.	Role-Models and Mentors:	The Scottish Government, COSLA and other national partners will, by autumn 2009, outline a range of measures aimed at encouraging more people to act as role-models and mentors.	<i>Role model mentors program to be developed.</i>
23.	Public Reassurance Training:	ACPOS, COSLA and the Scottish Government will work together to deliver, by spring 2010, a public reassurance training scheme for all relevant frontline police and council staff, (to be determined locally) based around the ACPOS Public Reassurance Strategy.	<i>Public Reassurance training for staff to be developed and delivered by Spring 2010.</i>
24.	Communicating with Young People:	The Scottish Government, COSLA and other national partners will develop, by early 2010, shared guidance for national and local agencies on how they can best communicate and engage with young people of all backgrounds on ASB issues.	<i>Guidance on communicating and engaging with young people to be developed by early 2010.</i>

25.	<i>Short Guide for the Public on ASB:</i>	The Scottish Government, COSLA and other national partners will produce, by the end of 2009, a short guide on ASB for members of the public, to be written in accessible language and contain information of particular relevance to communities. A version for young people will also be produced.	<i>Public Guide to ASB to be written by the end of 2009.</i>
LOCAL			
PREVENTION			
1.	<i>A revised PIER Model:</i>	The Scottish Government, COSLA and other national partners recommend that local agencies adopt the new PIER Model and structure strategic direction and service delivery around achieving a balanced, holistic and multi-agency approach that focuses on prevention and early intervention.	<i>Review of Angus Councils ASB policy and procedures scheduled for 2009. This will take account of the foregoing recommendation on a balanced multi agency approach. The current policy already focuses on prevention and early intervention as fundamental in tackling ASB.</i>
2.	<i>Support with ASBOs:</i>	The Scottish Government, COSLA and other national partners recommend that local partners ensure that, where appropriate, those being considered for ASBOs are offered comprehensive support packages at the earliest possible stage and are continued to be offered support where required after any court order is in place.	<i>Through the current ASB Multi Agency tasking and coordinating group meetings focuses strongly on support for those committing ASB. ASBO are applied for sparingly and where possible support is provided to the perpetrator as it stands. Alignment with guidance provided centrally on this issue will be implemented as soon as the detail is published.</i>
3.	<i>Community Wardens:</i>	The Scottish Government, COSLA and other national partners recommend that local authorities consider how best to integrate their wardens service to ensure increased efficiency and consistency of service.	<i>A feasibility study of the current warden service is being undertaken to be transform the service into a generic support and enforcement service taking into account any learning experiences of other Scottish and UK local authorities</i>
4.	<i>Performance Management Information:</i>	The Scottish Government, COSLA and other national partners recommend that local agencies standardise their performance management information in line with the national framework that will be developed.	<i>Performance Management Framework currently being developed locally, this will take cognisance of any national requirement that may be produced as a result of the foregoing National Actions.</i>
5.	<i>New Guidance on the 2004 Act:</i>	The Scottish Government, COSLA and other national partners recommend that local agencies revise their ASB strategies, policies and procedures in line with revised national guidance on the 2004 Act.	<i>Angus Community Safety Partnership will take cognisance of any guidance of recommendation made under this framework whilst carrying out the review of their community Safety Anti Social Behaviour Strategy and supporting policy and procedures.</i>

INTEGRATION			
6.	Annual Strategic Assessments:	The Scottish Government, COSLA and other national partners recommend that local partners should develop, annually, a joint strategic assessment to aid them in prioritising their local needs and deploying their services appropriately and proportionately.	<i>Angus Community Safety Partnership is in the process of developing its second Community Safety Strategic assessment at present. Initial assessment currently being utilised as 'good practise example' nationally by Analysts Division of Scottish Police College.</i>
7.	Multi-Agency Groups:	The Scottish Government, COSLA and other national partners recommend that local partners should establish a multi-agency group consisting of not only traditional partners such as the police but also including non-traditional partners from the health and education sectors.	<i>Within Angus 2 Tactical Tasking and Coordination Groups have been developed to deal with all ASB and Community Safety Matters. These groups meet on a monthly cycle. The ASB Tactical Tasking and Coordinating Group comprises of multi agency partners and deals with individuals and households that are responsible for committing ASB. The Community Safety Tactical Tasking Coordinating group delivers the recommendations outlined in the strategic assessment and primarily looks a prevention, intervention and diversionary activities where possible to avert ASB. Enforcement is an option utilised where the need arises in relation to minor ASB matters.</i>
8.	Problem-Solving Approach:	The Scottish Government, COSLA and other national partners recommend that all local partners adopt a problem-solving approach. Implementing such an approach should allow partners to identify the appropriate lead agency in each case and react to emerging issues.	<i>Within Angus a clear problem solving approach has been adopted to tackle issues of ASB these groups are set up where emerging issues have been identified by the ASB Tactical Tasking & Coordinating Group or the Community Safety Tactical Tasking and Coordinating Group</i>
9.	Review Statutory ASB Strategies:	The Scottish Government, COSLA and other national partners recommend that local authorities and the relevant Chief Constables should review and update their ASB strategies in line with this Review by 2010.	<i>The draft Community Safety / Anti Social Behaviour Strategy 2009-2012 is about to be published. Cognisance of any further guidance forthcoming from the Scottish Government from this review will be taken by 2010.</i>
10.	Information Sharing Protocols (ISPs) and Referral Procedures:	The Scottish Government, COSLA and other national partners recommend that all local partners should sign an ISP to aid the speedy sharing of information, resources and outcomes.	<i>Information Sharing Protocol already in place between Angus Council and Tayside Police. This document has recently been reviewed and signed off. An information sharing protocol covering all partner agencies involved within the ASB arena is being developed by the Joint Services Team Solicitor.</i>

11.	Information Sharing Standards and Training:	The Scottish Government, COSLA and other national partners recommend that, to underpin any ISP, partners support and promote information sharing by ensuring the use of effective standards and training on the gathering, recording, monitoring and sharing of information.	<i>Angus Council has undertaken a review of its current information sharing protocol and amended it in keeping with MOPI. Following the review of the ongoing ASB policy and procedures training on all aspects of ASB investigations will be carried out. This will take cognisance of ensuring the use of effective standards on the gathering, recording, monitoring and sharing of information.</i>
12.	Shared premises:	The Scottish Government, COSLA and other national partners recommend that as part of a strategic review of local ASB services, specific consideration should be given to sharing premises with other services that might aid the tackling of ASB.	<i>Angus Council Community Safety Team and ASB investigations Unit, Tayside Police Community Safety Team and Tayside Fire and Rescue Community Safety Officer under the banner of Angus Community Safety Partnership Joint Services Team, have been co located at the Sheriff Court Annexe, Forfar, since the 27th February 2009. This has brought about benefits in providing a cohesive approach to jointly tackling all aspects of ASB.</i>
ENGAGEMENT			
13.	National Standards of Community Engagement:	The Scottish Government, COSLA and other national partners recommend that local agencies ensure that ASB services are compliant with the National Standards of Community Engagement.	<i>Partnership working ongoing with Community Learning Development to ensure compliance is met.</i>
14.	Community Feedback:	The Scottish Government, COSLA and other national partners recommend that local partner agencies establish formal mechanisms to ensure participants in community engagement activities receive feedback on the outcome of their involvement and the wider community receives relevant feedback on the outcome of action to tackle ASB.	<i>Community Safety Communications Strategy being developed to ensure recommendation is being met. Training at a local level to be carried out.</i>
15.	Victim and Witness Services:	The Scottish Government, COSLA and other national partners recommend that local agencies strengthen their community engagement activities aimed at providing support and reassurance to victims of ASB, where required or appropriate.	<i>Victim Support funded through the Angus Community Safety Partnership are represented at the monthly ASB and Community Safety Tactical Tasking and Coordinating meeting.</i>
16.	Community Reparation:	The Scottish Government, COSLA and other national partners recommend that local agencies involved in providing community reparation as part of criminal justice intervention should consult with local groups, organisations and victims, on the types of activities that would be appropriate to be undertaken.	<i>This recommendation will be addressed with the Youth Justice Coordinator</i>

17.	Rationalised Engagement:	The Scottish Government, COSLA and other national partners recommend that local agencies rationalise their community engagement activities where appropriate to prevent consultation fatigue and promote the sharing of information and resources.	<i>Angus Community Safety Partnership is structured to accommodate the desired outcome via the Community Safety Tactical Tasking and Coordinating Group which meets on a monthly basis.</i>
18.	Early and Effective Engagement:	The Scottish Government, COSLA and other national partners recommend that, wherever possible, local partner agencies involve communities at the earliest possible stage in the planning of services to give them adequate time to make considered choices.	<i>Community Safety section of Joint Services Team is currently looking to redefine and strengthen links and consultation with Community Planning Partners and the community groups in the local area</i>
19.	Participatory Budgeting:	The Scottish Government, COSLA and the other national partners recommend that local partner agencies consider the merits of participatory budgeting, whereby local community and neighbourhood groups are empowered to help direct the distribution of small pots of funding to tackle and address local ASB problems.	<i>Angus awaiting the outcome of the Pilot exercise on participatory budgeting and good practise guidance that should flow from this exercise before progressing this locally.</i>
COMMUNICATION			
20.	Communicating a revised PIER* Model:	The Scottish Government, COSLA and other national partners recommend that local agencies, taking their lead from the new Media & Communications Network, look for ways to raise public awareness of the full range of methods they use to tackle ASB.	<i>National Guidance on good practise once developed will be fed into the Communications Strategy for ASB.</i>
21.	National Policy Position Statements:	The Scottish Government, COSLA and other national partners recommend that local agencies take cognisance of the National Policy Position Statements to be launched by the end of 2009 and ensure local practice is tailored accordingly.	<i>Local practise will be tailored in keeping with this recommendation.</i>
22.	Good Practice Examples:	The Scottish Government, COSLA and other national partners recommend that local agencies develop good practice examples around their most successful work to tackle ASB and submit these for inclusion on the online database that will be developed nationally by the end of 2009.	<i>Once the good practise database comes on line Angus Council will comply with this request.</i>
23.	Role-Models and Mentors:	The Scottish Government, COSLA other national partners recommend that local agencies look for opportunities to support or establish services which provide role-models and mentors for young people and others.	<i>Angus Council will where possible comply with this request. There already exists strong links with the Angus Volunteer Centre and its varied projects who could assist in this recommendation.</i>

24.	Public Reassurance Training:	The Scottish Government, COSLA and other national partners recommend that all relevant frontline police and council officers – to be determined locally – who have regular contact with the public on ASB matters attend the new Public Reassurance training programme when it is established in spring 2010.	<i>Once the National Training program has been developed training to ACSP operational staff will be rolled out.</i>
25.	Engaging with Young People:	The Scottish Government, COSLA and other national partners recommend that local agencies explore new ways of engaging young people on their own terms to ensure they are able to input meaningfully into the development of local strategies, the design of local services, and the production of marketing activity.	<i>ACSP will ensure that this action is part of the Communications Strategy and with partners in Community Learning Development, Criminal Justice and the Volunteer Centre develop methods of achieving this outcome.</i>

EQUALITY SCREENING

Policy Control Document

Name of Policy, Procedure or Report Promoting Positive Outcomes

Lead Department/Service Neighbourhood Services

What is the aim of the policy, procedure or report?

To inform elected members of national developments in the tackling of anti social behaviour and report on the current status of Angus Council policy and procedures as regards this.

Is this a new or a review of an existing policy, procedure or report?

This is a new report.

Screening Process

Has the policy, procedure or report already been assessed for its impact on people from different racial backgrounds, people of different genders and people with disabilities.

Yes No

If Yes, unless there have been significant changes, no further action is required. Please sign and date immediately below and retain for reference.

If No, does the policy, procedure or report involve or have consequences for the people the council serves or employs?

Yes No

If yes, proceed to Step 1 of the Full Impact Assessment on page 2.

If no, please state why not

If no, The policy, procedure or report is not relevant and no further action is required.

Please sign and date immediately and keep for reference

Name: Isla Davidson
Signature: _____
Date: 18 May 2009