

## Caerphilly County Borough Council - Integrated Impact Assessment

This integrated impact assessment (IIA) has been designed to help support the Council in making informed and effective decisions whilst ensuring compliance with a range of relevant legislation, including:

- Equality Act 2010 (Statutory Duties) (Wales) Regulations 2011
- Welsh Language (Wales) Measure 2011
- Socio-economic Duty – Sections 1 to 3 of the Equality Act 2010
- Well-being of Future Generations (Wales) Act 2015
- Statutory Consultation v Doctrine of Legitimate Expectation and Gunning Principles

**PLEASE NOTE: Section 3 Socio-economic Duty only needs to be completed if proposals are of a strategic nature or when reviewing previous strategic decisions. See page 6 of the Preparing for the Commencement of the Socio-economic Duty Welsh Government Guidance.**

### 1. Proposal Details

Lead Officer	Head of Service	Service Area & Department	Date
Mark Jennings	Vacant Post	Strategy & Development, Caerphilly Homes	23/07/21

#### **What is the proposal to be assessed?** *Provide brief details of the proposal and provide a link to any relevant report or documents.*

The 2021 Local Housing Market Assessment (LHMA) Prospectus and the 2021/20 Programme Development Plan (PDP). Local Authorities are now required to produce and submit a LHMA Prospectus to Welsh Government.

The purpose of the LHMA Prospectus is to:

- provide a clear and concise summary of the housing need and demand in the borough and succinctly identifies the Council's housing priorities.
- explain the type of provision planned for delivery with Welsh Government Social Housing Grant in order to meet the Council's housing priorities.

The PDP outlines the amount and type of affordable housing to be built in the borough using Welsh Government Social Housing Grant. The PDP is submitted to Welsh Government on a quarterly basis, following updating by the Council.

## 2. Equality Act 2010 (Statutory Duties) (Wales) Regulations 2011

*(The Public Sector Equality Duty requires the Council to have “due regard” to the need to eliminate unlawful discrimination, harassment, and victimisation; advance equality of opportunity between different groups; and foster good relations between different groups). Please note that an individual may have more than one protected characteristic.*

<u>Protected Characteristics</u>	Does the proposal have any positive, negative or neutral impacts on the protected characteristics and how?	If there are negative impacts how will these be mitigated?	What evidence has been used to support this view?
<b>Age</b> ( <i>people of all ages</i> )	<p>Positive impact.</p> <p>The Council collects information on age as part of the housing application form. This information is fed into the LHMA and PDP to influence the amount and type of accommodation to be built.</p> <p>Accommodation is provided to people aged 16+. People apply for the housing via the Common Housing Register, in accordance with the criteria set out in the Common Allocation Policy. Some of the accommodation can be age specific, e.g. older person’s housing for people aged 55 or 60 yrs depending on the landlord.</p>		Application data collected via the Common Housing Register.
<b>Disability</b> ( <i>people with disabilities/ long term conditions</i> )	<p>Positive impact.</p> <p>The Council collects information on disability as part of the housing application form. This information is fed into the LHMA and PDP to influence the amount and type of accommodation to be built.</p> <p>Discussions take place with the Occupational Therapist (Housing) and colleagues in Social Services regarding</p>		Application data collected via the Common Housing Register.

	any specific requirements for accommodation. This information helps shapes the type of accommodation provided on sites progresses through the PDP and s106 process.		
<b>Gender Reassignment</b> <i>(anybody who's gender identity or gender expression is different to the sex they were assigned at birth)</i>	Neutral impact.  Any specific need for rehousing would be processed via the Common Allocation Policy and not necessarily via the LHMA Prospectus and PDP.		
<b><u>Protected Characteristics</u></b>	<b>Does the proposal have any positive, negative or neutral impacts on the protected characteristics and how?</b>	<b>If there are negative impacts how will these be mitigated?</b>	<b>What evidence has been used to support this view?</b>
<b>Marriage or Civil Partnership</b> <i>(people who are married or in a civil partnership)</i>	Neutral impact.  This would not be a deciding factor when determining the amount and type of provision of new homes.		Application data collected via the Common Housing Register.
<b>Pregnancy and Maternity</b> <i>(women who are pregnant and/or on maternity leave)</i>	Positive impact.  The Council collects information on pregnancy and maternity as part of the housing application form. This information is fed into the LHMA and PDP to influence the amount and type of accommodation to be built.		Application data collected via the Common Housing Register.
<b>Race</b> <i>(people from black, Asian and minority ethnic communities and different racial backgrounds)</i>	Neutral impact.  The Council collects information on race as part of the housing application form.  This is not currently a deciding factor when determining the amount and type of provision of new homes.		Application data collected via the Common Housing Register.

<u>Protected Characteristics</u>	Does the proposal have any positive, negative or neutral impacts on the protected characteristics and how?	If there are negative impacts how will these be mitigated?	What evidence has been used to support this view?
<b>Religion or Belief</b> ( <i>people with different religions and beliefs including people with no beliefs</i> )	<p>Neutral impact.</p> <p>The Council collects information on religion and belief as part of the housing application form.</p> <p>This would not be a deciding factor when determining the amount and type of provision of new homes.</p>		Application data collected via the Common Housing Register.
<b>Sex</b> ( <i>women and men, girls and boys and those who self-identify their gender</i> )	<p>Neutral impact.</p> <p>The Council collects information on sex as part of the housing application form.</p> <p>This would not be a deciding factor when determining the amount and type of provision of new homes.</p>		Application data collected via the Common Housing Register.
<b>Sexual Orientation</b> ( <i>lesbian, gay, bisexual, heterosexual, other</i> )	<p>Neutral impact.</p> <p>The Council collects information on sexual orientation as part of the housing application form.</p> <p>This would not be a deciding factor when determining the amount and type of provision of new homes.</p>		Application data collected via the Common Housing Register.

### 3. Socio-economic Duty (Strategic Decisions Only)

*(The Socio-economic Duty gives us an opportunity to do things differently and put tackling inequality genuinely at the heart of key decision making. Socio-economic disadvantage means living on a low income compared to others in Wales, with little or no accumulated wealth, leading to greater material deprivation, restricting the ability to access basic goods and services)*

**Please consider these additional vulnerable groups and the impact your proposal may or may not have on them:**

- Single parents and vulnerable families
- People with low literacy/numeracy
- Pensioners
- Looked after children
- Homeless people
- Carers
- Armed Forces Community
- Students
- Single adult households
- People misusing substances
- People who have experienced the asylum system
- People of all ages leaving a care setting
- People living in the most deprived areas in Wales (WIMD)
- People involved in the criminal justice system

<u>Socio-economic Disadvantage</u>	Does the proposal have any positive, negative or neutral impacts on the following and how?	If there are negative impacts how will these be mitigated?	What evidence has been used to support this view?
<p><b>Low Income / Income Poverty</b> <i>(cannot afford to maintain regular payments such as bills, food, clothing, transport etc.)</i></p>	<p>Positive impact.</p> <p>The purpose of the LHMA Prospectus and PDP is to identify the need and plan for the provision of good quality, affordable housing, which are typically let to people on low incomes.</p> <p>In addition, the investment in building new homes is utilised by the housing providers is to provide opportunities in targeted recruitment and training.</p>		<p>Data on income is collected via the Common Housing Register application process. This data shows that the majority of people accessing social housing earn less than the average income in Caerphilly.</p>
<p><b>Low and/or No Wealth</b> <i>(enough money to meet basic living costs and pay bills but have no savings to deal with any unexpected spends and no provisions for the future)</i></p>	<p>Positive impact.</p> <p>The purpose of the LHMA Prospectus and PDP is to identify the need and plan for the provision of good quality, affordable housing, which are typically let to people on low incomes.</p> <p>In addition, the investment in building new homes if utilised by the housing providers is to provide opportunities in targeted recruitment and training.</p>		
<u>Socio-economic Disadvantage</u>	Does the proposal have any positive, negative or	If there are negative impacts how	What evidence has been

	neutral impacts on the following and how?	will these be mitigated?	used to support this view?
<b>Material Deprivation</b> ( <i>unable to access basic goods and services i.e. financial products like life insurance, repair/replace broken electrical goods, warm home, hobbies etc.</i> )	<p>Positive impact.</p> <p>The purpose of the LHMA Prospectus and PDP is to identify the need and plan for the provision of good quality, affordable homes, which are typically let to people on low incomes.</p> <p>In addition, the investment in building new homes is utilised by the housing providers is to provide opportunities for social value and targeted recruitment and training.</p>		
<b>Area Deprivation</b> ( <i>where you live (rural areas), where you work (accessibility of public transport) Impact on the environment?</i> )	<p>Positive impact.</p> <p>The purpose of the LHMA Prospectus and PDP is to identify the need and plan for the provision of new good quality, affordable homes, which are typically let to people on low incomes.</p> <p>In addition, the investment in building new homes is utilised by the housing providers is to provide opportunities for social value and targeted recruitment and training.</p>		
<b>Socio-economic Background</b> ( <i>social class i.e. parents, education, employment and income</i> )	<p>Positive impact.</p> <p>The purpose of the LHMA Prospectus and PDP is to identify the need and plan for the provision of good quality, affordable homes, which are typically let to people on low incomes.</p> <p>In addition, the investment in building new homes is utilised by the housing providers is to provide opportunities for social value and targeted recruitment and training.</p>		The links between poverty and poor housing are well researched - <a href="#">The links between housing and poverty   JRF</a>

<u>Socio-economic Disadvantage</u>	Does the proposal have any positive, negative or neutral impacts on the following and how?	If there are negative impacts how will these be mitigated?	What evidence has been used to support this view?
<p><b>Socio-economic Disadvantage</b>  <i>(What cumulative impact will the proposal have on people or groups because of their protected characteristic(s) or vulnerability or because they are already disadvantaged)</i></p>	<p>Positive impact.</p> <p>The purpose of the LHMA Prospectus and PDP is to identify the need and plan for the provision of good quality, affordable housing, which are typically let to people on low incomes.</p> <p>In addition, the investment in building new homes if utilised by the housing providers is to provide opportunities in targeted recruitment and training.</p>		

#### 4. Corporate Plan – Council’s Well-being Objectives

*(How does your proposal deliver against any/all of the Council’s Well-being Objectives? Which in turn support the national well-being goals for Wales as outlined in the Well-being of Future Generations (Wales) Act 2015. Are there any impacts (positive, negative or neutral? If there are negative impacts how have these been mitigated?) Well-being Objectives*

<b>Objective 1</b> - Improve education opportunities for all	There have been many studies into the effects of homelessness and poor-quality accommodation on the educational attainment of young people. Through the provision of good quality, affordable housing, this policy will have a positive impact on the realisation of this objective.
<b>Objective 2</b> - Enabling employment	Thousands of job opportunities are created each year in the construction industry. In addition, the council and housing association partners all use social benefit clauses in their contracts to provide job and training opportunities for local people. This policy will, therefore, have a positive impact on the realisation of this objective.
<b>Objective 3</b> - Address the availability, condition and sustainability of homes throughout the county borough and provide advice, assistance or support to help improve people’s well-being	This policy relates directly and positively to the realisation of this objective.

<b>Objective 4</b> - Promote a modern, integrated and sustainable transport system that increases opportunity, promotes prosperity and minimises the adverse impact on the environment	Does not contribute directly to this objective. Although, the provision of new homes located in sustainable communities will minimise any adverse impact on the environment. The impact, therefore, is neutral.
<b>Objective 5</b> - Creating a county borough that supports healthy lifestyle in accordance with the Sustainable Development principle within the Well-being of Future Generations (Wales) Act 2015	Does not contribute directly to this objective. However, good quality, affordable housing contributes to good health and wellbeing. The impact, therefore, is positive.
<b>Objective 6</b> - Support citizens to remain independent and improve their well-being	The provision of a range of good quality, affordable housing contributes to enabling people to live independently and promotes well-being. The impact, therefore, is positive.

#### 4a. Links to any other relevant Council Policy






*(How does your proposal deliver against any other relevant Council Policy?)*

1. The policy links directly to the realisation of the 4 strategic themes of *A Foundation for Success 2018-2023' - Regeneration Strategy for Caerphilly County Borough* by helping to create prosperous and cohesive communities, promoting the foundational economy, helps to create sustainable communities and providing access to jobs, apprenticeships and training opportunities.
2. The provision of new homes contributes directly to the house building targets contained in the *Local Development Plan (2010)*.
3. The benefits of providing new homes including the promotion of the foundational economy and improving health and wellbeing contributes directly to the Wellbeing & Place Shaping Framework.
4. The provision of new homes and promotion of the foundational economy will contribute directly to aims set out in the *Local Housing Strategy 2021-26* (under development).
5. Strategic Equality Plan 2020-2024 – Equality Objective 2



## 5. Well-being of Future Generations (Wales) Act 2015 – The Five Ways of Working (ICLIP)

*(Also known as the sustainable development principles. The Act requires the Council to consider how any proposal improves the economic, social, environmental and cultural well-being of Wales using the five ways of working as a baseline)*

<u>Ways of Working</u>	How have you used the Sustainable Development Principles in forming the proposal?
<p><b>Long Term</b></p> 	<p>Housing is a long-term asset. The provision of new homes, built to high energy efficient and climate resilient standards, will add to the sustainability and wellbeing of the communities where these properties are located.</p>
<p><b>Prevention</b></p> 	<p>Additional new homes provides opportunities for people to live in good quality, affordable housing thereby reducing the need to live in homes which do not meet their needs and aspirations and relieving homelessness.</p>
<p><b>Integration</b></p> 	<p>The Council works in partnership with Welsh Government, the ABUHB and housing associations to plan and deliver new homes to meet the housing needs and priorities set out in the LHMA Prospectus. The LHMA Prospectus and PDP will help achieve the well-being goals of the partner organisations. The links between good housing and good health are well reserached, therefore, it is expected that the provision of new homes would have a positive impact on the health and wellbeing of the occupants, which would help contribute to the objectives of the National Health Service.</p>
<p><b>Collaboration</b></p> 	<p>The Council works in partnership with Welsh Government, the ABUHB and housing associations to plan and deliver new homes to meet the housing needs and priorities set out in the LHMA Prospectus.</p>
<p><b>Involvement</b></p> 	<p>Data taken from completed housing application forms is analysed to identify the range and type of housing needs in the borough. This information is considered during the LHMA process and the priorities identified are based on this information. Discussions also take place with the housing associations and other partners on the number and type of homes to be built.</p>

## 6. Well-being of Future Generations (Wales) Act 2015

<u>Well-being Goals</u>	Does the proposal maximise our contribution to the Well-being Goal and how?
<p><b>A Prosperous Wales</b>  <i>An innovative, productive and low carbon society which recognises the limits of the global environment and therefore uses resources efficiently and proportionately (including acting on climate change); and which develops a skilled and well-educated population in an economy which generates wealth and provides employment opportunities, allowing people to take advantage of the wealth generated through securing decent work</i></p>	<p>The homes provided by the council or housing association partners using Social Housing grant will be built using zero carbon or near zero carbon principles, thereby minimising the impact of development on the environment.</p> <p>New house building provides the council with the opportunity to promote the foundational economy by supporting local supply chains and through the creation of jobs, apprenticeships and training opportunities.</p>
<p><b>A Resilient Wales</b>  <i>A nation which maintains and enhances a biodiverse natural environment healthy functioning ecosystems that support social, economic and ecological resilience and the capacity to adapt to change (for climate change)</i></p>	<p>The homes provided by the council and housing association partners will be built using zero carbon or near zero carbon principles, thereby minimising the impact of development on the natural environment. An Environmental Impact Assessment may be required to be completed as part of the planning process depending on the nature of the development.</p>
<p><b>A Healthier Wales</b>  <i>A society in which people's physical and mental well-being is maximised and in which choices and behaviours that benefit future health are understood</i></p>	<p>There is a significant body of research which shows that poor quality housing is a wider determinant of poor health. Providing good quality, affordable homes and the promotional of the foundational economy will have a positive impact on health and wellbeing.</p>
<p><b>A More Equal Wales</b>  <i>A society that enables people to fulfil their potential no matter what their background or circumstances (including their socio-economic background and circumstances)</i></p>	<p>There is a wide body of research which demonstrates the importance of the provision of good quality, affordable housing. Building new homes will enable the council to promote the foundational economy and to create jobs, apprenticeships and training opportunities, which in turn will help to promote a more equal Wales. The analysis undertaken in the sections above clearly supports the positive impact that the LHMA Prospectus and the PDP will have in helping to create a more equal Wales.</p>
<p><b>A Wales of Cohesive Communities</b>  <i>Attractive, viable, safe and well-connected communities</i></p>	<p>Providing good quality, affordable homes will help to promote cohesive and sustainable communities. The LHMA Prospectus promotes a place making approach to ensure new developments have a positive impact on the wider community.</p>
<p><b>A Wales of Vibrant Culture and Thriving Welsh Language</b>  <i>A society that promotes and protects culture, heritage and the Welsh language, and which encourages people to participate in the arts, and sports and recreation</i></p>	<p>It has been assessed that the LHMA Prospectus and PDP will have a neutral impact on the Welsh Language. The LHMA Prospectus will be translated into Welsh.</p>
<p><b>A Globally Responsible Wales</b></p>	<p>The analysis provided in the sections above shows that the LHMA Prospectus and PDP will</p>

<p><i>A nation which, when doing anything to improve the economic, social, environmental and cultural well-being of Wales, takes account of whether doing such a thing may make a positive contribution to global well-being</i></p>	<p>have a positive impact on the local economy and society and that any impact on the environment will be minimised through the provision of good quality homes that meet high efficiency standards.</p>
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**7. Welsh Language (Wales) Measure 2011 and Welsh Language Standards**  
*(The Welsh Language Measure 2011 and the Welsh Language Standards require the Council to have ‘due regard’ for the positive or negative impact a proposal may have on opportunities to use the Welsh language and ensuring the Welsh language is treated no less favourably than the English language) [Policy Making Standards - Good Practice Advice Document](#)*



Requirement	Does the proposal have any positive, negative or neutral impacts on the following and how?	If there are negative impacts how will these be mitigated?	What evidence has been used to support this view? <i>e.g. the WESP, TAN20, LDP, Pupil Level Annual School Census</i>
<p><b>Links with Welsh Government’s <a href="#">Cymraeg 2050 Strategy</a> and CCBC’s <a href="#">Five Year Welsh Language Strategy 2017-2022</a> and the <a href="#">Language Profile</a></b></p>	<p>Neutral impact.  The LHMA Propectus will be made available in Welsh and will be posted on the council’s website.</p>		
<p><b>Compliance with the <a href="#">Welsh Language Standards</a>.</b> <i>Specifically, Standards 88 - 93</i></p>	<p>Neutral impact.  The LHMA Propectus will be made available in Welsh and will be posted on the council’s website.</p>		
<p><b>Opportunities to promote the Welsh language</b> <i>e.g. status, use of Welsh language services, use of Welsh in everyday life in work / community</i></p>	<p>Neutral impact.  The LHMA Propectus will be made available in Welsh and will be posted on the council’s website.  Welsh speakers are able to access the housing service using their preferred language.</p>		
<p><b>Opportunities for persons to use the Welsh language</b> <i>e.g. staff, residents and visitors</i></p>	<p>Neutral impact.  The LHMA Propectus will be made available in Welsh and will be</p>		

	<p>posted on the council's website. Welsh speakers are able to access the housing service using their preferred language.</p>		
<p><b>Treating the Welsh language no less favourably than the English language</b></p>	<p>Neutral impact.</p> <p>The Welsh language will be treated no less favourably than the English language.</p> <p>The policy will be made available in Welsh and will be posted on the council's website. Welsh speakers are able to access the housing service using their preferred language.</p>		
<p><b>7a. Having considered the impacts above, how has the proposal been developed so that there are positive effects, or increased positive effects on (a) opportunities for persons to use the Welsh language, and b) treating the Welsh language no less favourably than the English language.</b></p>			
<p>Neutral impact. The LHMA Prospectus will be made available in Welsh and will be posted on the council's website. Welsh speakers are able to access the housing service using their preferred language.</p>			

## 8. Data and Information

*(What data or other evidence has been used to inform the development of the proposal? Evidence may include the outcome of previous consultations, existing databases, pilot projects, review of customer complaints and compliments and or other service user feedback, national and regional data, academic publications and consultants' reports etc.)*

Data/evidence <i>(Please provide link to report if appropriate)</i>	Key relevant findings	How has the data/evidence informed this proposal?
<p>The 2018 LHMA analysed a range of data to identify housing needs throughout the borough, including data collected from the Common Housing Register.</p> <p>For a full list of the data please see the 2018 LHMA - <a href="#">Caerphilly - Local Housing Market Assessment</a></p>	<p>Key findings are set out in section 2 on the LHMA Prospectus.</p>	<p>The LHMA Prospectus is underpinned by the 2018 LHMA, which used a wide range of data to identify housing needs throughout the borough. Outputs from the 2018 LHMA area included within the LHMA Prospectus. The strategic priorities contained with the LHMA Prospectus are based on outputs from the 2018 LHMA.</p>

### Were there any gaps identified in the evidence and data used to develop this proposal and how will these gaps be filled?

The equalities data collected on the housing application forms is reliant on the applicant providing this information. Following good practice this information is not a mandatory part of the housing application form. Therefore, there will be gaps in the data, which we are not able to fill. All we can do is encourage applicants to complete this data fully when filling out their housing application form.

## 9. Consultation

*(In some instances, there is a legal requirement to consult. In others, even where there is no legal obligation, there may be a legitimate expectation from people that a consultation will take place. Where it has been determined that consultation is required, [The Gunning Principles](#) must be adhered to. Consider the [Consultation and Engagement Framework](#). Please note that this may need to be updated as the proposal develops and to strengthen the assessment.*

### Briefly describe any recent or planned consultations paying particular attention to evidencing the Gunning Principles.

Housing association partners have been consulted on the contents of LHMA Prospectus and the developments contained within the PDP. Regular meetings have been held with the housing associations to develop and finalise the PDP prior to its submission to Welsh Government. However, given the nature of both documents it would not be appropriate to undertake public consultation and engagement exercises on their outputs, which have been derived from a complex analysis of a wide range of data sources.

## 10. Monitoring and Review

<b>How will the implementation and the impact of the proposal be monitored, including implementation of any amendments?</b>	The PDP is reviewed quarterly with housing association partners. Updates are then submitted to Welsh Government. A new PDP is submitted to Welsh Government at the beginning of each financial year. The LHMA Prospectus is based on the outputs of the LHMA, which is currently produced every two years.
<b>What are the practical arrangements for monitoring?</b>	Quarterly meetings are held with housing association partners to review progress on the PDP.
<b>How will the results of the monitoring be used to develop future proposals?</b>	The PDP is updated following each quarterly meeting.
<b>When is the proposal due to be reviewed?</b>	The PDP is updated quarterly and the LHMA Prospectus will be updated following completion to the LHMA.
<b>Who is responsible for ensuring this happens?</b>	The Strategy & Development team within Caerphilly Homes.

## 11. Recommendation and Reasoning

<input checked="" type="checkbox"/>	Implement proposal with no amendments
<input type="checkbox"/>	Implement proposal taking account of the mitigating actions outlined
<input type="checkbox"/>	Reject the proposal due to disproportionate impact on equality, poverty and socio-economic disadvantage

Have you contacted relevant officers for advice and guidance?

Yes

No

## 12. Reason(s) for Recommendation

*(Provide below a summary of the Integrated Impact Assessment. This summary should be included in the "Summary of Integrated Impact Assessment" section of the Corporate Report Template. The Integrated Impact Assessment should be published alongside the Report proposal).*

The Council is required by Welsh Government to prepare a LHMA Prospectus and Programme Development Plan. The LHMA Prospectus is based on the outputs of the 2018 LHMA and the PDP has been finalised following detailed discussions with housing association partners. When approved by Cabinet the LHMA Prospectus will be made available in English and Welsh on the Council's website.

The production of the LHMA Prospectus and PDP are based on a robust analysis of data derived from the 2018 LHMA. Given the nature of the document's consultation and engagement on their development has been limited to key stakeholders only.

Overall, the integrated impact assessment shows that the production of the LHMA Prospectus and PDP do not give rise to any potential negative impacts. Most of the impacts identified were found to be positive. The PDP provision of social housing will have a significant positive impact on socio-economic deprivation, by providing people with affordable homes to live and opportunities for targeted recruitment and training. The provision of good quality homes also contributes to positive health and wellbeing outcomes.

## 13. Version Control

*(The IIA should be used in the early stages of the proposal development process. The IIA can be strengthened as time progresses to help shape the proposal. The Version Control section will act as an audit trail to evidence how the IIA has been developed over time)*

Version No.	Author	Brief description of the amendments/update	Revision Date
1	M Jennings	Draft IIA to submission on committee report.	20/07/21
2	M Jennings	Minor amendments following consultation with the Senior Policy Officer – Equalities & Welsh Language	23/07/21

### Integrated Impact Assessment Author

<b>Name:</b>	Mark Jennings
<b>Job Title:</b>	Principal Housing Strategy Officer
<b>Date:</b>	26/04/21

### Head of Service Approval

<b>Name:</b>	Vacant Post
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<b>Job Title:</b>	Chief Housing Officer		
<b>Signature:</b>		<b>Date:</b>	