

## Borders Immigration Citizenship Systems

### Equality Impact Assessment

Demonstrating Compliance with the Public Sector Equality Duty (PSED)

### Equality Impact Assessment (EIA)

- Remember that your duty is to demonstrate that you have had “due regard” to equalities issues.

Useful guidance:

- [Discrimination and differentiation guidance](#)
- [Equality Impact Assessments](#)

#### 1. Name and outline of policy proposal, guidance or operational activity

##### Using Ministry of Defence Sites to Accommodate Asylum Seekers

###### General Outline

This EIA considers the impacts of proposals to use new types of accommodation to support asylum seekers who would otherwise be destitute under the powers set out in sections 95 or 98 of the Immigration and Asylum Act 1999 – specifically by using Ministry of Defence sites formerly used to house military personnel. The first two sites identified for possible use are Tenby (South Wales) and Folkestone (Kent), but similar sites may also be used depending on further consideration of their viability.

###### Background to the Proposal

Asylum seekers entering the support system with an immediate accommodation need are placed in an “initial accommodation” facility, generally a multi-person full-board hostel where food, toiletries and other assistance is provided on site. Hotels are also sometimes used as a short-term contingency. Before the COVID-19 pandemic, the average person would typically remain in the accommodation for 4-6 weeks, whilst their application for support under section 95 was being considered and arrangements made to source longer term “dispersal accommodation” (generally flats and houses) suitable for their needs. Some

individuals remained in the initial accommodation for longer times, generally because they had the need for accommodation of a particular type or at a particular location and this took longer to arrange.

This system relies on turnover – in that as the asylum claims, or appeals of claims, of those in dispersed accommodation, are resolved they leave asylum support and move into other accommodation (for instance, provided by local authorities). This then frees up spaces for new asylum seekers entering the system.

However, at the end of March 2020, the Home Secretary took the decision to pause all cessation of asylum support in light of public health guidance on COVID-19. This policy was necessary because of the public health crisis, but the consequence has been that there has been no significant outflow from the accommodation estate. There has, however, still been considerable inflow, with increasing pressures caused by the widely reported arrivals (in particular persons crossing the channel) of new asylum seekers and also with historic failed asylum seekers claiming support under section 4(2) of the 1999 Act on the grounds of destitution and an inability to return to their country of origin because of COVID-19 factors. Additionally, there have been other complicating factors, such as the difficulties in obtaining new dispersal accommodation at a time of restrictions on movements of people.

The operational impact of COVID-19 has been significant and difficult to predict. The Home Office has had to respond as best it can as events have unfolded and to a dynamic situation with restrictions/steps imposed or lifted with very little advance notice. In practical terms, several thousand emergency hotel places have had to be procured to accommodate the extra people, the number of which are growing daily.

The pause on positive cessations (i.e. where the person has been granted refugee status or leave to remain for another reason) was lifted on 11 August 2020 and the pause on negative cessations (i.e. where the person has been refused asylum and exhausted all appeals) lifted on 11 September.

However, positive cessations are only happening in a staged and phased way in order to limit the impact on local authorities who may have a responsibility to provide housing assistance to some of the positive cases. It is hoped that negative cases can be progressed more quickly, but there is a large stock that require individual consideration and a decision to deny support will usually attract a right of appeal.

The resumption of cessations will in due course free up existing dispersal accommodation spaces and efforts are being made to secure new dispersal accommodation, but it is not expected that outflow will match inflow for some time. Meeting this demand through further hotel use is not sustainable and other accommodation options therefore need to be considered.

These are the reasons for using Ministry of Defence sites formerly used to house military personnel, with the first two sites identified for possible use being Tenby (South Wales) and Folkestone (Kent).

## **Key further background to the proposal**

The following points are of key relevance to the proposal:

- The accommodation and support arrangements at the sites are not expected to be materially different to those already in place in the asylum system - in particular the arrangements in place at the “initial accommodation” centres described above.
- The management of the accommodation and support services provided at the sites will be through the existing contractual arrangements already in place with private providers (Clearsprings in the case of those accommodated in Wales and the South of England).
- In particular, the detailed service standards set out in the “Statement of Requirements” to the contracts will apply to the provision of accommodation and other support provided to cover the “essential living needs” of those accommodated at the sites, as well as various requirements to provide appropriate information and ensure access to medical services.
- Those accommodated at the sites will also be provided access to the advice and assistance from Migrant Help, under separate contractual arrangements, as well as being able to raise issues and complaints about the standard of the services they are being provided with.
- It is not expected that the sites at Folkestone and Tenby will be used for women or child dependants. This is because the sleeping quarters available are large dormitories and it is not possible, without significantly reducing the overall numbers of people that can be accommodated at the sites, to make adaptations that would enable females to be accommodated apart from males. Females asylum seekers arriving in the UK who require accommodation will therefore be placed in alternative initial accommodation that provides the same services. Suitable facilities for children are also unavailable at the sites.
- The sites will be used to accommodate single males, predominantly those entering the support system for the first time after recently arriving in the UK from France or other EU countries (though probably after a short period of quarantine in alternative accommodation in line with public health procedures).
- It will not generally be possible to make adaptations to the accommodation arrangements to cater for disabilities, so these cases are unlikely to be accommodated at the sites.
- In the first instance, the individuals will be accommodated under the powers set out in section 98 of the 1999 Act, pending consideration of their eligibility to receive support under section 95 of the 1999 Act and (if they are) their longer-term accommodation arrangements.
- The speed at which they move to dispersal accommodation will depend on the availability of that dispersal accommodation. As per the normal policy arrangements set out in the “Allocation of Accommodation” guidance, the assessment of longer-term accommodation arrangements will consider a range of individual factors. In general, however, the key consideration is whether the individual requires accommodation in a particular location because of their particular

circumstances, mostly commonly to preserve continuity of medical treatment or established support networks. These considerations are less likely to apply to newly arrived asylum seekers.

- The assessment process and other information that may come to light, for example as the result of medical information, may show that a particular individual has needs that mean they should no longer be accommodated at the sites. Arrangements will therefore need to be made to move them elsewhere. There are existing processes to cover these scenarios.

### **COVID-19 issues**

Following the outbreak of the COVID-19 pandemic and the Government's response to controlling and managing the public health risk, the Home Office has worked closely with Public Health England and the respective agencies in the devolved administrations, to put in place a range of temporary measures to ensure that provisions of asylum support continues to be delivered and those affected by the COVID-19 outbreak receive the support they need, including those with protected characteristics under the 2010 Equality Act.

In recognition of the challenges of managing public health within the asylum accommodation estate, accommodation providers have worked closely with Public Health to ensure that those in full-board facilities receive guidance on social distancing and self-isolation and made appropriate adjustments to on-site facilities to enable this to happen.

The same approach will be followed as work progresses to bring the Folkestone and Tenby sites into operational use and in other similar facilities that may be used.

## **2. Summary of the evidence considered in demonstrating due regard to the Public Sector Equality Duty.**

### **Age and Sex**

The sites at Folkestone and Tenby are only intended to be used to accommodate single males, predominantly people entering the support system for the first time after recently arriving in the UK. The age profile of the group is therefore unknown.

However, current available internal management information on the profile of the supported population shows that the vast majority of such cases are under the age of 49 years. Less than 0.5% are over the age of 70.

There is no reason to believe that the age profile of those who might be accommodated at the sites will be materially different.

### **Race**

The Home Office does not publish a full breakdown of the supported population by race.

However, published statistics show that 10 countries of nationality account for around 66% of the supported population: Iraq; Iran; Albania; Pakistan; China; Nigeria; Afghanistan; Eritrea; El Salvador; Sudan. Those accommodated at the sites are likely to be mainly from the same range of countries.

As the above indicates, the largest majority of the supported population originate from Middle East and North Africa, Sub-Saharan Africa and South Asia countries and will consist of a wide range of 'non-white' ethnicities.

There is no reason to believe that the profile of those who might be accommodated at the Folkestone and Tenby sites will be materially different.

### **Religion & Belief**

The Home Office does not publish a full breakdown of the supported population by religion or belief.

However, given the profile of nationalities described above, it is reasonable to infer that a significant proportion of those accommodated at the sites will identify as Muslim or Christian, though the proportion that practice their religion and to what extent is not known.

There is no reason to believe that the profile of those who might be accommodated at the Folkestone and Tenby sites will be materially different.

### **Health, Disability**

Those receiving support who are disabled or have significant health needs are managed on a case by case basis. Information on the numbers of such cases is not recorded.

However, as stated above the sites at Folkestone and Tenby are unlikely to be used for those with these characteristics.

### **Sexual Orientation**

There is no published data on the number of supported people who identify as gay, lesbian, bisexual, transsexual or intersex (LGBTi+). However, there is experimental data on the number of main asylum applicants whose claims made in 2018 were based wholly or in part because they are LGB. This experimental data indicated that in 2018 less than 4% (1,502) of asylum applications were raised on the basis of sexual orientation.

### **Sources:**

- Asylum Population - Published Statistics on

<https://www.gov.uk/government/statistics/immigration-statistics-year-ending-march-2020>

Internal Home Office Management Information

- Public Health – COVID19

Office for National Statistics. Latest data and analysis on coronavirus (COVID-19) in the UK and its effect on the economy and society.

<https://www.ons.gov.uk/peoplepopulationandcommunity/healthandsocialcare/conditionsanddiseases>

Public Health England. Latest data and analysis on coronavirus (COVI-19) in the UK

<https://www.gov.uk/government/news/weekly-covid-19-surveillance-report-published>

[COVID-19: review of disparities in risks and outcomes](#)

<https://www.gov.uk/government/publications/covid-19-understanding-the-impact-on-bame-communities>

<https://www.gov.uk/guidance/government-advice-on-home-moving-during-the-coronavirus-covid-19-outbreak>

**Engagement with Local Government** –There are on-going discussions with the relevant local authorities in the areas where the sites are located, consistent with contractual requirements.

Local authorities do not provide direct support to asylum seekers during the period their asylum claims and any appeals are under consideration, but may have a duty to provide assistance, particularly in respect of assisting the persons to find alternative housing, in the event that they are granted refugee status or leave to remain for another reason.

This and other issues, including impacts on community relations, will form part of on-going discussions with the relevant local authorities covering Folkestone and Tenby. However, given that the accommodation sites are not intended for use for those with children or who have serious vulnerabilities, it is unlikely that the local authorities will be required to actually provide accommodation to the group as “priority need” cases.

**Engagement with NGO Sector** - The National Asylum Stakeholder Forum (NASF) is the overarching term used to refer to the Strategic Engagement Groups (SEG) and the NASF sub-groups which are the Home Office’s (HO) principal engagement forums with its external asylum and resettlement Non-Government Organisation (NGO).

The Home Office has remained in discussion with NGOs through the NASF forums about the support arrangements for those in full-board initial accommodation - i.e. accommodation with very similar characteristics to the arrangements that are intended to be put in place in Folkestone and Tenby.

In general, the view of NGOs is that certain aspects of the current full-board provision in initial accommodation centres may need revision to ensure that it fully covers the requirement to provide for “essential living needs”, given that people are spending much longer in the facilities. As an example, there is no clear arrangement by which the person is provided with provision to replace worn-out clothes. These issues form part of on-going policy discussion and any changes to the current general model of full-board support revision will also apply to those accommodated in the new proposed sites.

### **Miscellaneous Relevant Published Policies**

#### Local Authority Homelessness

<https://www.gov.uk/guidance/homelessness-code-of-guidance-for-local-authorities/chapter-8-priority-need>

<https://www.gov.uk/government/publications/refugees-guidance-about-benefits-and-pensions>

#### Asylum Support Policies

<https://www.gov.uk/government/collections/asylum-support-asylum-instructions>

#### Service Specification – Initial Accommodation

[http://data.parliament.uk/DepositedPapers/Files/DEP2018-1112/AASC - Schedule 2 - Statement of Requirements](http://data.parliament.uk/DepositedPapers/Files/DEP2018-1112/AASC_-_Schedule_2_-_Statement_of_Requirements)

### **3A. Consideration of limb 1 of the duty: Eliminate unlawful discrimination, harassment, victimisation and any other conduct prohibited by the Equality Act**

The public sector equality duty under section 149 of the Equality Act 2010 requires public bodies to have due regard to the need to:

- Eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the 2010 Act.

The duty covers eight protected characteristics: age, disability, gender reassignment, pregnancy and maternity, race (including ethnic or national origins, colour or nationality), religion or belief, sex, and sexual orientation. It also applies to marriage and civil partnership, but only in respect of the requirement to have due regard to the need to eliminate discrimination.

Schedule 18 to the 2010 Act sets out exceptions to the duty. In relation to the exercise of immigration and nationality functions, section 149(1)(b) – advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it – does not apply to the protected characteristics of age, race (excluding colour) or religion or belief. While the Home Office does not have a duty to consider these specified characteristics, further consideration has nevertheless been given below.

The accommodation and support arrangements at Folkestone and Tenby will only be used to accommodate adult males. In that sense, there is differential treatment between males and females arriving in the UK in that males may be provided with accommodation and support at one of the sites and females will not. However, female asylum seekers with the same need for accommodation and support will be provided with equivalent assistance at an alternative initial accommodation centre or hotel. Schedule 23(3) of the Equality Act 2010 permits sex discrimination in relation to communal accommodation. In applying this exemption account must be taken of a) whether and how far it is reasonable to expect that the accommodation should be altered or extended or that further accommodation should be provided, and (b) the frequency of the demand or need for use of the accommodation by persons of one sex as compared with those of the other. The sleeping quarters available at the two sites are large dormitories and it is not possible, without significantly reducing the overall numbers of people that can be accommodated at the sites, to make adaptations that would enable females to be accommodated apart from males. Suitable facilities for children are also unavailable at the sites. As there are far more male asylum seekers than females and many of the female claimants have children, it has been decided that it is appropriate to use the sites for male asylum seekers only.

The possibility of impacts, including indirect discrimination in respect of each of the relevant protected characteristics applicable to single males, is discussed in section 4 below. The effect of section 19 of the 2010 Act is that indirect discrimination does not occur if an individual with a protected characteristic is put at a particular disadvantage by virtue of a particular provision, criterion or practice, but the provision, criterion or practice can be shown to be a proportionate means of achieving a legitimate aim. On the evidence available, it is considered that the use of the Folkestone and Tenby sites does not directly disadvantage or discriminate on the basis of any of the protected characteristics and is a proportionate means of meeting the legitimate aim of providing appropriate accommodation to ensure asylum seekers are not left destitute, such as to justify any indirect impacts.

**3B. Consideration of limb 2: Advance equality of opportunity** between people who share a protected characteristic and people who do not share it

The Equality Act specifies that this requirement involves having due regard to 3 specific aspects:

- removing or minimising disadvantages suffered by people who share a relevant protected characteristic that are connected to that characteristic
- taking steps to meet the needs of people who share a relevant protected characteristic that are different from the needs of persons who do not share it
- encouraging people who share a relevant protected characteristic to participate in public life or in any other activity in which participation by such persons is disproportionately low.

As per Schedule 18 to the 2010 Act, this limb of the duty does not have to be considered in relation to immigration and nationality functions in respect of race (excluding colour), religion or belief and age.

However, whilst the Home Office does not have a duty to consider these matters, the proposal will apply to single males applying to receive asylum support equally, irrespective of their protected characteristics.

There is no evidence that placing some of the group at one of the sites, instead of at a hotel or alternative initial accommodation centre, will impact on the quality of support they receive or impair their ability to pursue their asylum claims.

**3C. Consideration of limb 3: Foster good relations** between people who share a protected characteristic

The duty is to have due regard to the need to foster good relations between people with different protected characteristics. The Equality Act specifies that this includes:

- tackling prejudice
- promoting understanding

The proposal is part of the measures the Home Office has in place to ensure that adequate support arrangements are available for asylum seekers who would otherwise be destitute, so that they are able to pursue their claim for asylum.

Destitute asylum seekers with protected characteristics are not analogous to British Citizens and other permanent residents with similar characteristics who are in need of welfare assistance from public funds; so to the extent that asylum support is less generous, this is justified by the need to control immigration. Any provision of support over and beyond what is necessary to enable the individuals to meet their housing and subsistence needs could undermine public confidence in the asylum system and hamper wider efforts to tackle prejudice and promote understanding within the general community and amongst other migrant groups.

The proposal results in placing asylum seekers in areas of the country not previously used to house asylum seekers and there may be impacts on community relations that will need to be carefully managed in partnership with the police, local authorities and others. However, similar issues have arisen recently in respect to the use of hotels, which may well be perceived by the general public as a more generous accommodation option than former MoD barracks. The proposal is therefore



consistent with the general objective of tackling prejudice and promoting understanding between people with different characteristics.

There are well established procedures to manage associated risks in respect of community relations. Any continued indefinite use or expansion of hotel facilities is probably more likely to lead to detrimental impacts on community relations and between protected groups, as opposed to using other accommodation options.

#### **4. Foreseeable impacts of policy proposal on people who share protected characteristics**

The support service specification at the sites is being finalised, but it will follow the existing framework. For those provided with accommodation in full-board facilities the detailed service standards are set out in the contracts with the accommodation providers; specifically, the “Statement of Requirements”.

The basic components of the support at the sites will be

- Accommodation - in this case likely to be shared dormitory style bedrooms, with communal rooms for dining and recreational activities.
- Other support to cover “essential living needs”. The relevant parts of the Statement of Requirements states that this may be formed of either:
  - *full board accommodation of at least three (3) meals per day and essential personal hygiene items and toiletries; or*
  - *accommodation and cash to the appropriate value, as advised by the Authority.*

The precise form of support provided at the sites will need to be fixed in discussion with the providers, but may need to also include:

- Laundry services.
- The means to communicate - for example with Migrant Help and legal advisors.
- Access to healthcare.
- Some provision for travel to essential appointments – such as medical or those necessary for the purposes of pursuing the asylum claim (though these are probably covered through existing Home Office arrangements that provide rail tickets to interviews and appeals and through legal aid).
- Clothes (especially if the stay at the accommodation sites is prolonged).

All of the above may be provided via in kind provision, cash or vouchers, or a mixture of both.

In light of the longer periods asylum seekers are remaining in similar initial accommodation facilities, as a result of Covid and the issues described above, support provision in the facilities is being reviewed. Any changes are likely to apply to those accommodated at the two sites.

Consideration has been given to whether and to what extent, the proposal will have an impact on those accommodated in the sites (single males) who share protected characteristics compared with those who do not. Both direct discrimination and indirect discrimination have been considered.

### **Age**

All decisions to provide accommodation to an adult asylum seeker are made on a needs basis, regardless of age. Consideration of whether an asylum seeker destitute is based on establishing fact and evidence.

Migrant Help provides advice, guidance and assistance in preparing applications for section 95 support and there are a number of questions on the application form that are designed to identify relevant factors that might affect the type of accommodation and support appropriate to a person, for example because of an underlying health condition or vulnerability. Age is not a factor that per se results in a different accommodation solution for the individual, but as a general rule the elderly are more likely to have a vulnerability that means they are unsuitable for some forms of accommodation – for example because they cannot share rooms.

This may mean that the accommodation and support services at the sites is unsuitable for some elderly asylum seekers, but this will fall to be considered on a case by case basis.

### **Race**

All decisions to provide accommodation to an adult asylum seeker are made on a needs basis, regardless of race. Consideration of whether an asylum seeker is destitute is based on establishing fact and evidence.

There is some PHE evidence that has highlighted the potential increased prevalence of Covid-19 in black, Asian and minority ethnic (BAME) communities. That evidence needs to be balanced against the evidence that infection rates for those receiving asylum support (predominantly members of the BAME community) appear to be low.

There are a number of measures that have been put in place in initial accommodation facilities to encourage and facilitate social distancing and the same measures will apply at the two sites. Beds in the dormitory style sleeping quarters will be at least 2 metres apart. Regular cleaning will also take place and other measures to reduce Covid risks considered and reviewed from time to time.

### **Religion / Belief**

All decisions to provide accommodation to an adult asylum seeker are made on a needs basis, regardless of religion. Consideration of whether an asylum seeker is destitute is based on establishing fact and evidence.

The standard service specification for those in initial accommodation requires culturally appropriate food to be provided (for instance Halal meat for Muslims).

The opportunity to maintain a level of participation in religious life is generally recognised as a requirement for those practising a religious faith. Some asylum seekers are likely to view regular attendance at a place of worship (e.g. a church or mosque) as part of practising their faith. There are a range of churches reasonably nearby to the sites at Tenby and Folkestone that can be visited, but a limited number of mosques. If there are no practical means through which those accommodated at the sites are able to attend a place of worship consideration will need to be given to appropriate mitigations – for example setting aside some part of each of the accommodation centres for private prayer or making some other arrangement to meet this need.

### **Health / Disability**

Generally, asylum seekers with accommodation-related care needs that are not linked to destitution fall to be assisted under separate statutory arrangements - the Care Act 2014 or the Children Act 1989 (or equivalent legislation in Scotland, Wales and Northern Ireland), following an appropriate care assessment. The proposal therefore has no impact on this group.

Asylum seekers with disabilities which do not meet that statutory threshold may remain supported under sections 95 and 1998 of the 1999 Act (in some cases with assistance from local authorities) and such adjustments to their accommodation arrangements as may appear necessary.

As significant adjustments to the accommodation arrangements at the two sites is not considered practical any individuals who require adjustments will need to be accommodated elsewhere. The individuals will be identified through existing processes - in particular asylum screening and the targeted questions set out in the section 95 application form that is completed with the assistance of Migrant Help.

### **Sexual Orientation**

All decisions to provide accommodation to an adult asylum seeker are made on a needs basis, regardless of sexual orientation. Consideration of whether an asylum seeker is destitute is based on establishing fact and evidence.

There is no evidence that people with the protected characteristic require a materially different form of support than others. There may, however, be some circumstances where dormitory style sleeping arrangements are unsuitable for some gay males, for example because they may be subjected to the prejudices of other. These issues fall to be handled on a case by case basis according to existing

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| <p>processes. The same consideration applies to any trans asylum seekers, who will also fall to be considered on a case by case basis.</p>  |
| <p><b>5. In light of the overall policy objective, are there any ways to avoid or mitigate any of the negative impacts that you have identified above?</b></p>  |
| <p>As set out above, there are no noted significant negative impacts or disadvantages for protected groups arising from the use of the proposed sites at Folkestone and Tenby – noting in particular that the service specification, although yet to be fully fixed, is not intended to be materially different to the service standard already used in other initial accommodation facilities and hotels. There are a small number of issues identified in section 4 (see especially under “religion/belief”) where there is a possibility of some detrimental impacts that may require mitigating actions.</p> <p>The dormitory style sleeping arrangements may in some respects be slightly different to the arrangements in the wider asylum accommodation estate, where single bedrooms or shared bedrooms with only one or two others, is more common. However, to the limited extent that these arrangements may be unsuitable for some asylum seekers because of their protected characteristics, there are systems in place to provide them with other accommodation elsewhere.</p> <p>The proposal results in placing asylum seekers in areas of the country not previously used to house asylum seekers in large numbers and there may be impacts on community relations, but that will be managed in partnership with the police, local authorities and others.</p> |
| <p><b>Review date –.</b></p>  |
| <p><b>I have read the available evidence and I am satisfied that this demonstrates compliance, where relevant, with Section 149 of the Equality Act and that due regard has been made to the need to: eliminate unlawful discrimination; advance equality of opportunity; and foster good relations.</b></p>  |
| <p><b>SCS sign off</b></p>  |
| <p><b>Name/Title</b></p>  |
| <p><b>Directorate/Unit</b><br/> Resettlement Asylum Support &amp; Integration<br/> UK Visas &amp; Immigration</p>   |

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|--|----------------|
| <b>Lead contact</b>  |                |
| <b>Date</b>  | September 2020 |
| All completed EIAs <b>must</b> be sent to the <a href="#">Talent and Inclusion team</a><br>Date sent to Talent and Inclusion Team? |                |

## Part 2 - Policy Equality Sign-off

**The EIA can be completed throughout the development of a policy but is only signed at the point the policy is made public namely finalised and implemented.**

To assist in evaluating whether there is robust evidence that could withstand legal challenge, the following questions must be asked prior to sign-off.

**Q.** Has 'due regard' been made to the 3 aims of the General Duty (Section 149 of the Equality Act 2010)?

- **Eliminate unlawful discrimination**, harassment, victimisation and any other conduct prohibited by the Act;
- **Advance equality of opportunity** between people who share a protected characteristic and people who do not share it; and
- **Foster good relations** between people who share a protected characteristic.

**Q.** Have all the **protected characteristics** been considered?: Yes – though noting that the proposal relates to males only.age

- disability
- gender reassignment
- pregnancy and maternity
- race (includes ethnic or national origins, colour or nationality)
- religion or belief (includes lack of belief)
- sex
- sexual orientation

**Q.** Have the relevant stakeholders been involved and/or consulted? Yes, though there are on-going discussions, especially with the relevant local authorities

**Q.** Has all the relevant **quantitative and qualitative data** been considered and been subjected to **appropriate analysis**? Yes

**Q.** Have lawyers been consulted on any legal matters arising? Yes.

**Q.** Has an appropriate date been established for reviewing the policy?