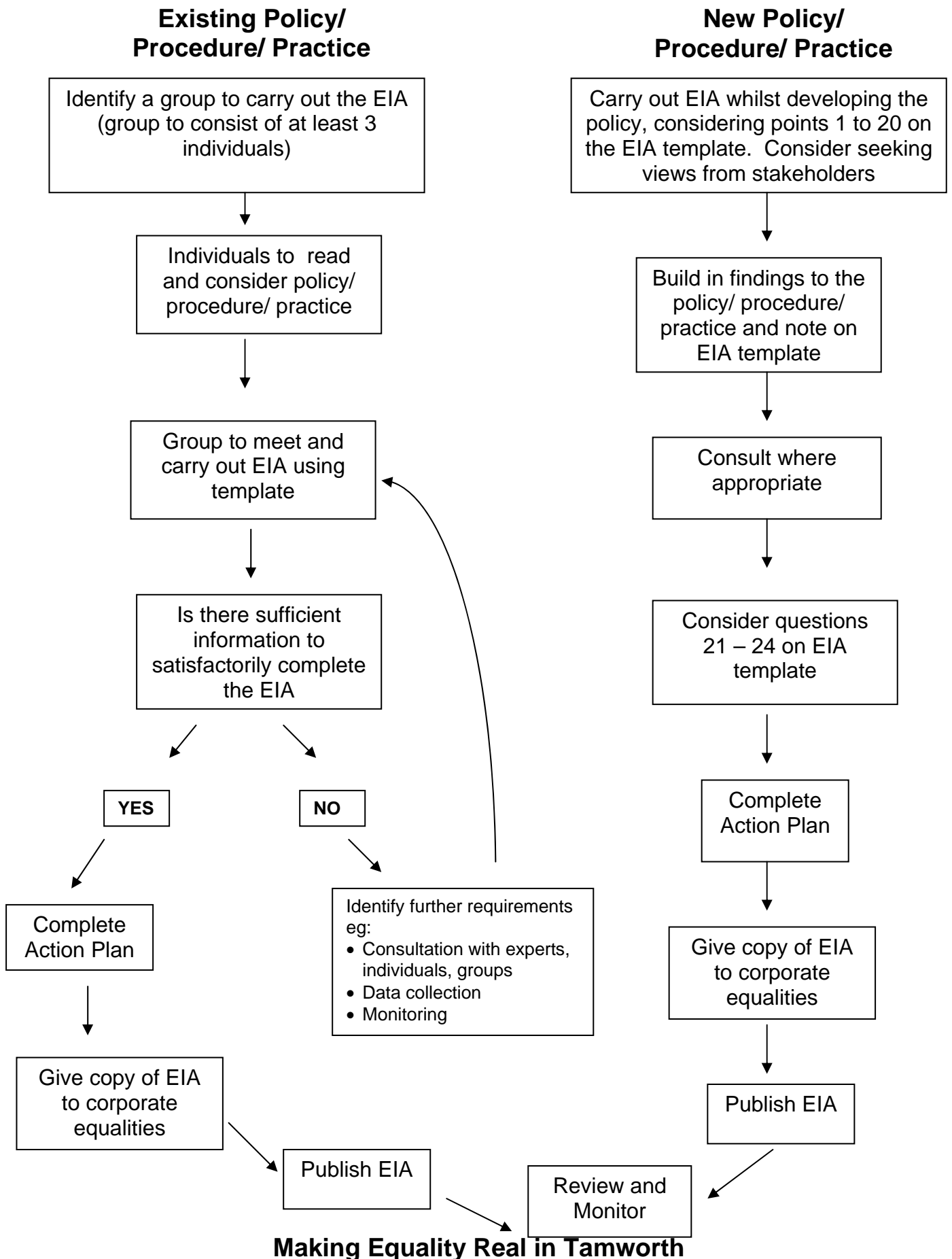




**Tamworth Borough Council
Draft Local Plan 2006-2031
Equality Impact Assessment
February 2014**

Equality Impact Assessment Procedure



Equality Impact Assessment Template

Name of policy/ procedure/ practice to be assessed	Tamworth Local Plan		Date of Assessment	February 2014	
Is this a new or existing policy/ procedure/ practice?	New Policy	Officer responsible for the Assessment	Anna Priestley	Department	Development Plan Team - Planning and Regeneration
1. Briefly describe the aims, objectives and purpose of the policy/ procedure/ practice?	<p>The Local Plan is a key planning document that will provide the necessary framework for determining the scale of development until 2031, where it will broadly be located and the standard of quality that the development should achieve. It includes specific policies to address the key issues and challenges facing the Borough up to 2031 and seeks to -promote urban regeneration; improve access to jobs, health care, education, shops, leisure and community facilities, open space, sport and recreation;-focus development in existing centres and create sustainable, cohesive neighbourhoods.</p> <p>The Local Plan covers a range of topic areas, including housing, employment, green spaces, biodiversity, leisure and retail. The policies are set out within 4 over-arching chapters: a prosperous borough, stronger and vibrant neighbourhoods, a high quality environment and a connected and sustainable town. A Monitoring and Delivery chapter sets out how the policies will be monitored and delivered.</p> <p>Some of these policies will have little or no impact on equality issues. For example ‘Flood Risk and Water Management’ and ‘Sustainable Development and Climate Change Mitigation’ are key policies which affect the whole community and it is difficult to determine how these policies could affect different equality groups in a significant way. Equally, however, the broad objectives of the strategy and the strategy itself could have a positive impact on delivering equality objectives. For example, focusing investment in the network of existing centres will ensure that services, employment and facilities are accessible to the most deprived communities (which tend to include higher number of people with disabilities, older people, carers and recent arrivals from BME groups) thus resulting in an overall positive impact from an equalities perspective. Likewise, focusing co-ordinated interventions in a series of Regeneration Priority Areas should ensure that the most deprived neighbourhoods receive a co-ordinated approach to regeneration which not only improves the environment, housing stock and access to employment but also community facilities.</p> <p>As a result the Local Plan policies and allocations have been grouped into four key chapters based on the spatial strategy, to enable the assessment of key themes on different equality groups. These areas are:</p>				

	<ul style="list-style-type: none"> • A Prosperous Town • Strong and vibrant neighbourhoods • A High Quality Environment • A Sustainable Town 										
<p>2. Are there any associated policy/ procedure/ practice which should be considered whilst carrying out this equality impact assessment?</p>	<p>The Local Plan policies and allocations have been subject to a Sustainability Appraisal/Strategic Environmental Assessment. This has ensured that sustainability issues, including equality related issues relating to health, education, community safety and aspiration are given full consideration in the preparation and adoption of refining policies.</p> <p>The Council's adopted Statement of Community Involvement (SCI) (which sets out how and when communities will be involved in the Local Plan production process) has been used to ensure that all sections of Tamworth's communities have had the opportunity to input into the production of the Local Plan. This document has recently been updated and the new version should be adopted early in 2014, in time for the new draft Local Plan consultation. However at the time of preparing this EIA the 2006 SCI is still in place,</p>										
<p>3. Who is intended to benefit from this policy/ procedure/ practice and in what way?</p>	<p>All those who engage with the planning system and require planning guidance and advice, including members of the public, elected members, developers, private applicants.</p>										
<p>4. What are the desired outcomes from this policy/ procedure/ practice?</p>	<p>The outcomes are set out under 26 separate policies summarised below:</p> <table border="1" data-bbox="613 842 2013 1426"> <thead> <tr> <th data-bbox="613 842 927 879">Policy Description</th> <th data-bbox="934 842 2013 879">Remit</th> </tr> </thead> <tbody> <tr> <td data-bbox="613 879 927 1086">SP1: Spatial Strategy for Tamworth</td> <td data-bbox="934 879 2013 1086">Provides a guide to how the spatial vision and strategic objectives will be achieved in practical terms. The role of the spatial strategy is to set out how much development there will be, broadly where it will go, when it will take place and who will deliver it. It emphasises the 'centres first' objective, spatial direction for delivering housing and employment needs whilst identifying key spatial priorities for infrastructure and environmental improvements.</td> </tr> <tr> <td data-bbox="613 1086 927 1222">SP2: Supporting investment in Tamworth Town Centre</td> <td data-bbox="934 1086 2013 1222">Identifies opportunities for retail, leisure, culture/tourism & office development along with encouraging higher density residential and improved linkages within the town centre and to the out of centre retail areas. It also identifies the key historic landmarks and introduces design and conservation principles.</td> </tr> <tr> <td data-bbox="613 1222 927 1358">SP3: Supporting investment in local & neighbourhood centres</td> <td data-bbox="934 1222 2013 1358">Sets out guidance for achieving environmental and accessibility improvements and where applicable linked to delivering community regeneration objectives.</td> </tr> <tr> <td data-bbox="613 1358 927 1426">SP4: Sustainable economic growth</td> <td data-bbox="934 1358 2013 1426">Sets out the employment land requirement over the plan period and identifies the existing network of strategic employment areas along with a number of new</td> </tr> </tbody> </table>	Policy Description	Remit	SP1: Spatial Strategy for Tamworth	Provides a guide to how the spatial vision and strategic objectives will be achieved in practical terms. The role of the spatial strategy is to set out how much development there will be, broadly where it will go, when it will take place and who will deliver it. It emphasises the 'centres first' objective, spatial direction for delivering housing and employment needs whilst identifying key spatial priorities for infrastructure and environmental improvements.	SP2: Supporting investment in Tamworth Town Centre	Identifies opportunities for retail, leisure, culture/tourism & office development along with encouraging higher density residential and improved linkages within the town centre and to the out of centre retail areas. It also identifies the key historic landmarks and introduces design and conservation principles.	SP3: Supporting investment in local & neighbourhood centres	Sets out guidance for achieving environmental and accessibility improvements and where applicable linked to delivering community regeneration objectives.	SP4: Sustainable economic growth	Sets out the employment land requirement over the plan period and identifies the existing network of strategic employment areas along with a number of new
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	employment sites allocations which will meet some of Tamworth's future Employment needs. The policy is supported by Appendix C which sets specific details for each of the allocated sites and the constraints/requirements that will need to be overcome in developing them.
SP5: Housing delivery	This policy sets out the overall future housing need release of land to achieve a balanced delivery over the plan period to meet identified housing need including the criteria for achieving high quality development in sustainable locations. The provision will be met through a mixture of sustainable urban extensions, housing site allocations (listed within this policy) and the remainder outside of the borough within Lichfield and North Warwickshire.
SP6: Strategic Urban Extensions	Includes a criteria based policy for delivering the four proposed strategic housing sites including the housing numbers and associated infrastructure required to deliver them.
SP7: Regeneration Priority Areas	Identifies Regeneration Priority Areas: Post War Social Housing areas, and the Wilnecote Corridor as a result of them demonstrating high levels of deprivation and/or a poor quality environment. Sets out a series of priorities to address in each area and commits the council and its partners to work in partnership to deliver spatial interventions to improve the physical environment and deliver social and economic renewal.
SP8: Environmental Assets	Maps green and blue infrastructure and identifies a series of priority areas and schemes and policy principles to deliver enhancements and improvements. These include improving and enhancing the network of green linear linkages across the town, and to the, canal and river network.
SP9: Sustainable Infrastructure	Identifies the strategic infrastructure, including transport, flood risk and climate change mitigation and community infrastructure to deliver the overall strategy.
CP1: Hierarchy of centres	Reinforces the 'centre first' approach to delivering identified future convenience and comparison retail need and defines the hierarchy of centres and sets out acceptable uses in each tier of centre. Sets out the approach to 'town centre use' proposals outside of centres including floor space thresholds as a basis to undertake impact assessments. Sets out restrictions on future retail and leisure expansion at out of town retail parks.
CP2: Employment Areas	This policy defines the acceptable uses within the employment areas- B1 (b,c), B2 & B8 and sets out the criteria to be met if alternative uses are proposed within them. The policy provides detail of environmental and accessibility improvements and encourages the use of renewable and low carbon energy technology.
CP3: Supporting growth in culture & tourism	Sets out support for tourism and culture led development; in particular related to the town centre and its proposed leisure zone. Identified supporting infrastructure including hotels and accessibility improvements including to Drayton Manor.

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CP4: Affordable Housing	This policy establishes affordable housing need throughout the plan period. It sets out thresholds and the level of developer contribution towards the provision of affordable housing target.
CP5: Housing Types	The policy establishes standards for new housing development including the size, type and mix of units, based on evidence arising from the latest Housing Needs Study. Looks towards providing for the requirements of different groups within the population.
CP6: Housing density	This policy contains a banded density target for particular borough wide locations including a higher density target for centres, transport nodes and a lower target for elsewhere whilst respecting the local context
CP7: Gypsy & Traveller provision	Whilst not allocating specific sites, this policy establishes criteria for assessing applications for site proposals.
CP8: Sport & Recreation	This provides and promotes a network of high quality sport and recreation facilities across the borough to meet needs, whilst aiming to protect existing needed facilities.
CP9 Open Space	This seeks to protect the existing network of high quality open space across the borough and sets out criteria for assessing proposals which involve a loss of open space.
CP10: Design of new development	This policy introduces a number of principles to achieve high quality buildings and places.
CP11: Protecting the Historic Environment	This includes a list of principles to be considered when proposing development which impacts on the historic environment including listed buildings, Conservation Area & scheduled ancient monuments.
CP12: Protecting and enhancing biodiversity	This aims to preserve sites and species, reinforce links between habitats and ensure appropriate consideration to development depending on status of sites i.e. national and local. It also encourages habitat restoration and creation, with emphasis on community led initiatives.
CP13: Delivering Sustainable Transport	The policy sets out priority measures for improving accessibility and linkages, particularly by public transport, walking and cycling on a borough wide basis and to/from strategic development sites.
CP14: Sustainable Development and Climate Change Mitigation	This supports measures to achieve carbon zero development including renewable energy proposals and resource management.
CP15: Flood Risk and Water management	This policy requires new development to consider areas susceptible to fluvial and pluvial flooding including the application of SUDs and sustainable urban design.

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	CP16: Providing and protecting community infrastructure	This sets out support for community facilities and infrastructure to be located in accessible locations and encourages dual use to be considered where appropriate in sustainable locations.
	CP17 Infrastructure & Developer Contributions	This policy includes the key infrastructure required to deliver the strategy and introduces the Infrastructure Delivery Plan
5. What factors/ forces could contribute/ detract from the outcomes?	Factors could include available budgets; changing political objectives, the current state of the economy; and suitable land availability.	
6. Who are the main stakeholders in relation to the policy/ procedure/ practice?	Everyone who works and lives in the borough will be affected by the proposals of the strategy, as will organisations and individuals who wish to promote development within the district.	

7. Which individuals/ groups have been/ will be consulted with on this policy/ procedure/ practice?

Please explain

The Borough Council has been working on the Local Plan (previously known as the Core Strategy) since 2006 and has produced a number of consultation documents, including the Issues and Options in 2008, an Option Report and a proposed Spatial Strategy, both in 2009, the specific Housing Policy document during early 2011.

The Tamworth Local Plan 2001-2011 was adopted in July 2006 and under the provisions of the Planning and Compulsory Purchase Act 2004, the policies remain in force for three years. The Secretary of State has confirmed which policies are saved in 2009.

The Council published its Local Plan in June 2012. Underpinning its spatial strategy for the borough is the need to balance growth with the protection of the borough's natural and built assets to ensure it will not have detrimental impact on the quality of life for Tamworth's communities. Further, it seeks to ensure that policies do not contribute to, or increase the effects of climate change (i.e. Flood Risk, Global Warming, loss of biodiversity, etc).

In November 2012 the Council submitted the 2006-2028 Local Plan for examination. The appointed Planning Inspector (David Vickery) had several areas of concern, notably over the lack of suitable land use allocations for housing, employment and town centre uses. To address these concerns the Council proposed to modify the Local Plan by making additional allocations. To do this, the Council would have needed to carry out a Sustainability Appraisal (SA) on all proposed sites and suitable alternatives. In February 2013 the Inspector called an Exploratory Meeting. The Inspector's note recommended the Council to withdraw the Local Plan from examination due to the high risk of a legal challenge over SA issues. The Inspector referenced the recent legal challenges over the Greater Norwich and Forest Heath adopted development plans.

Part of the work set out by the Council at the Exploratory Meeting was to include land use allocations for housing, employment and town centre uses within the Local Plan. Currently the Council is preparing an evidence base to support these allocations.

During this period the council has undertaken continuous consultation with the communities of Tamworth, along with other stakeholders including developers, landowners and infrastructure providers to identify and agree a series of issues and

	<p>options for delivering future development within the borough. This has included delivering stakeholder workshops, staffed public exhibitions at borough wide locations and presentations to individual groups across the borough. In addition to ensuring information was made available on the Council's website, permanent exhibitions on the Core Strategy were placed in the reception area of Marmion House and also at the library. During the production of the Local Plan a number of LDF newsletters have been produced and distributed to keep stakeholders up to date of the Core Strategy's progress.</p> <p>The new draft Local Plan will be subject to a 6 week consultation period whereby anyone with an interest in the plan will be invited to submit representations. As before, consultation will take place in a wide range of ways.</p> <p>An updated version of the Statement of Community Involvement (SCI) has been produced and consultation on this document took place in 2013. The SCI takes into account hard to reach groups and is to be adopted early in 2014 prior to the consultations on the Draft and Pre-submission publication Local Plan due to take place in 2014.</p> <p>The pre-submission Local Plan publication will also be subject to a 6 week consultation period whereby anyone with an interest in the plan will be invited to submit representations. However, at this stage, representations are limited to comments on the soundness and legal compliance of the Local Plan.</p>	
<p>8. Are there concerns that the policy/ procedure/ practice <u>could</u> have a differential impact on racial groups?</p>	<p>Y</p>	<p>No direct evidence base has been identified on which to make an assessment. Larger housing types may be required by certain BME communities but this will be reviewed by ongoing updates of Housing Needs Studies which, in turn, will determine the type of housing provided within the borough.</p> <p>Policy CP5 notes that all proposals for housing development should ensure that they meet the requirements of different groups within the population, where there is a proven need and demand and provide an appraisal of the local community context and housing need of that community</p>

<p>9. Are there concerns that the policy/ procedure/ practice <u>could</u> have a differential impact due to gender?</p>	<p>N</p>	<p>There is no direct evidence base on which to make an assessment.</p>
<p>10. Are there concerns that the policy/ procedure/ practice <u>could</u> have a differential impact due to them being transgender or transsexual?</p>	<p>N</p>	<p>There is no direct evidence base on which to make an assessment.</p>
<p>11. Are there concerns that the policy/ procedure/ practice <u>could</u> have a differential impact due to disability?</p>	<p>Y</p>	<p>The location of services, employment and retail could discriminate against access by those with physical and sensory disabilities. Likewise, the type and location of housing could also impact on access by people with physical and sensory disabilities and the level of provision and location of an adequate open space and sport and recreation opportunities could have a differential impact on people with mental health related disabilities.</p> <ul style="list-style-type: none"> • A Prosperous Borough Focussing investment within the existing network of centres with their good accessibility by public transport offers a positive impact on those groups who rely on public transport. Ensuring sustainable economic growth has the potential to create employment opportunities for people suffering from mental health related disabilities through increasing opportunities for employment. • Strong and Vibrant Neighbourhoods Ensuring proposals for housing development meet the requirements of different groups within the population, where there is a proven need and demand and provide an appraisal of the local community context and housing need of that community should ensure disability related issues are capable of being addressed. • A High Quality Environment Ensuring a high quality network of publically accessible open space and access to sport and recreation facilities should ensure that requirements related to physical disabilities are addressed and that mental health related

		<p>disabilities are considered through improving access to natural infrastructure.</p> <ul style="list-style-type: none"> • A Sustainable Town <p>Ensuring new development is located in sustainable locations adequately served by public transport could increase their overall accessibility to people with physical disabilities. Likewise, ensuring community facilities are located within existing centres or in accessible locations increases their accessibility. The requirement for travel plans should ensure disability related requirements are considered to improve their accessibility.</p>
12. Are there concerns that the policy/ procedure/ practice <u>could</u> have a differential impact due to sexual orientation?	N	<p>No data on sexual orientation exists as this is the only social identity factor omitted from the National Census. Equally no reliable data exists on sexual orientation that applies to Tamworth. It is therefore difficult to assess the impact of planning decisions and strategies on this equality group.</p>
13. Are there concerns that the policy/ procedure/ practice <u>could</u> have a differential impact due to age?	Y	<p>The Local Plan is based on population projections which anticipate an overall aging population which will have specific housing needs. Policy CP5 notes that all proposals for housing development should ensure that they meet the requirements of different groups within the population, where there is a proven need and demand and provide an appraisal of the local community context and housing need of that community.</p> <p>Staffordshire County Council Flexi Care Strategy estimates that the growth in population of those aged 65 and over between 2010 and 2030 will be 72% in Tamworth, the largest growth in Staffordshire. Flexi Care Housing provides an opportunity for people to live in their own accommodation with the security of care and support being available when needed. The Strategy identifies the level of units required to meet demand in Tamworth (823) and how many need to be available for rent or purchase. It will be important to meet the need of flexi care accommodation alongside any other specific needs identified.</p> <p>The link between older age and physical mobility requires services to be provided in accessible locations to avoid isolation and exclusion. The strategy of focusing services and community facilities in accessible, sustainable locations should ensure that older people remain able to access these services.</p> <p>The Local Plan also anticipates a growing younger population. For younger people ensuring services are located in accessible locations (through a</p>

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		<p>means other than the private car) should ensure they have adequate access to schools, shops, sport and recreation, employment, health services.</p> <ul style="list-style-type: none"> • A Prosperous Borough Focussing investment within the existing network of centres with their good accessibility by public transport offers a positive impact on those groups who rely on public transport. Ensuring sustainable economic growth has the potential to create employment opportunities for both older and younger people who may not have access to a private car. • Strong and Vibrant Neighbourhoods Ensuring proposals for housing development meet the requirements of different groups within the population, where there is a proven need and demand and provide an appraisal of the local community context and housing need of that community should ensure issues related to older people are capable of being addressed. • A High Quality Environment Ensuring a high quality network of publically accessible open space and access to sport and recreation facilities should ensure that all age groups have adequate access to open space. • A Connected and Sustainable Town Ensuring new development is located in sustainable locations adequately served by public transport could increase their overall accessibility to older and younger peoples. Likewise, ensuring community facilities are located within existing centres or in accessible locations increases their accessibility.
<p>14. Are there concerns that the policy/ procedure/ practice <u>could</u> have a differential impact due to religious belief?</p>	<p>Y</p>	<p>Specific faith groups may require the provision of places of worship.</p> <p>Policy CP16: Community Facilities sets out support for community facilities, including places of worship, to be located in accessible locations and encourages dual use to be considered where appropriate in sustainable locations.</p> <p>Policy CP17 Infrastructure & Developer Contributions sets out an expectation that where new development creates a requirement for new or improved physical, social and green infrastructure beyond existing</p>

		provision, developers will be expected to provide, or contribute to the additional requirement, which may include places of worship.
15. Are there concerns that the policy/ procedure/ practice <u>could</u> have a differential impact on Gypsies/ Travellers?	Y	Specific housing requirements associated with Gypsies, Travellers and Travelling Show People is an issue for planning policy to address. A policy is in place which underpins the provision of accommodation for Gypsies and Travellers. CP7: Provision for Gypsies and Travellers and Travelling Show People. Whilst not allocating specific sites, this policy establishes specific criteria for assessing applications for site proposals to ensure proposals deliver sustainable and appropriate sites in terms of both Gypsy and Traveller communities and the settled community.
16. Are there concerns that the policy/ procedure/ practice <u>could</u> have a differential impact due to dependant/caring responsibilities?	N	There is no direct evidence base on which to make an assessment.
17. Are there concerns that the policy/ procedure/ practice <u>could</u> have a differential impact due to them having an offending past?	N	There is no direct evidence base on which to make an assessment.

<p>18. Are there concerns that the policy/ procedure/ practice could have an impact on children or vulnerable adults?</p>	<p>Y</p>	<p>The Local Plan anticipates a growing younger population. For younger people, including children, ensuring services are located in accessible locations (through a means other than the private car) should ensure they have adequate access to schools, shops, sport and recreation, employment, health services.</p> <ul style="list-style-type: none"> • A Prosperous Town Focussing investment within the existing network of centres with their good accessibility by public transport offers a positive impact on those groups who rely on public transport. Ensuring sustainable economic growth has the potential to create employment opportunities for both children and vulnerable adults who may not have access to a private car. <p>.</p> <ul style="list-style-type: none"> • A High Quality Environment Ensuring a high quality network of publically accessible open space and access to sport and recreation facilities should ensure that all groups have adequate access to open space. <ul style="list-style-type: none"> • A Sustainable Town Ensuring new development is located in sustainable locations adequately served by public transport could increase their overall accessibility to children and vulnerable adults. Likewise, ensuring community facilities are located within existing centres or in accessible locations increases their accessibility.
<p>19. Does any of the differential impact identified cut across the equality strands (e.g. elder BME groups)?</p>	<p>Y</p>	<p>The Local Plan's focus on locating access to services and facilities in sustainable locations increases their accessibility to different groups including older people and younger people, children, people with disabilities and potentially faith groups. In addition, ensuring adequate and appropriate housing provision which caters for the needs of different groups has a positive impact on people with disabilities and older people and potentially BME communities.</p>

<p>20. Could the differential impact identified in 8 – 19 amount to there being the potential for adverse impact in this policy/ procedure/ practice?</p>		N	<p>There are no adverse differential impacts identified. There are a number of positive differential impacts which re outlined above.</p>
<p>21. Can this adverse impact be justified:</p> <ul style="list-style-type: none"> • on the grounds of promoting equality of opportunity for one group? • For any other reason? 	Y	N	<p>N/A</p>
<p>22. As a result of carrying out the equality impact assessment is there a requirement for further consultation?</p>		N	<p>The differential impacts are broadly positive or neutral. The implementation of the Local Plan's policies will be monitored against a number of indicators which are capable of being reviewed should any negative outcomes be identified. A further EqiA would accompany any subsequent review of the Local Plan.</p>
<p>23. As a result of this EIA should this policy/ procedure/ practice be recommended for implementation in its current state?</p>	Y		<p>Yes; the impact has revealed a broadly positive impact on the different equality strands.</p>

PLEASE COMPLETE THE FOLLOWING ACTION PLAN FOR ALL IMPACT ASSESSMENTS

Equality Impact Assessment Action Plan

Complete the action plan demonstrating the changes required in order to meet TBC's commitment to equality and diversity. The action plan must contain monitoring arrangements, the publishing of results and the review period required for this policy.

ACTION/ ACTIVITY	RESPONSIBILITY	TARGET	PROGRESS
Ensure equality needs are capable of being considered in future Local Plan consultations. This will require consultation on the production of Development Plan Documents to continue to be in accordance with the SCI ensuring that all residents who wish to be involved in the preparation of DPDs can express their views.	Development Plans Manager	As set out in The Local Development Scheme and SCI.	
<p>Monitoring arrangements: Through public consultation in accordance with the SCI. Includes consultation a wide number of community groups: statutory stakeholders; other agencies; service providers; business sector; local communities; developers and landowners.</p>		Data collected as and when consultations take place.	
Publication:			

Review Period: EqIA will be updated prior to submission of the Local Plan.		Reviewed at each stage of Local Plan preparation	

Expand as appropriate

**Signed Anna Priestley – Development Plan Officer
(Completing Officer).....**

Date25/02/2014.....

**Signed
(Head of Department)Matthew Bowers.....**

Date25/02/14.....

**Signed
Corporate Diversity/ Equality**

Date