

Why do an Equalities Impact Assessment (EqIA)?

1. Equalities Impact Assessment (EqIA) is part of Oxford City Council's [Public Sector Equality Duty \(PSED\) \(Equality Act 2010\)](#).

The General PSED enables Oxford City Council to:

- a. **identify and remove discrimination,**
 - b. **identify ways to advance equality of opportunity,**
 - c. **foster good relations.**
2. [An EqIA must be done before making any decision\(s\)](#) that may have an impact on people and/or services that people use and depend on.
 3. [An EqIA form is one of many tools](#) that can simplify and structure your equalities assessment.
 4. We are passionate about equalities, and we highly recommend that [Corporate Management Team \(CMT\) reports and all projects must attach an EqIA](#).

A good EqIA has the following attributes:

1. **Comprehensively considers the [9 protected characteristics](#).**

1. Age	6. Race & Ethnicity
2. Disability	7. Religion or Belief
3. Gender Reassignment	8. Sex
4. Marriage & Civil Partnership	9. Sexual Orientation
5. Pregnancy & Maternity	NEW- Socio-economic inequalities (voluntary adoption)
	NEW- Sanctuary seeking status leading to intersecting inequalities (voluntary adoption)

2. It has **considered equality of treatment** towards service users, residents, employees, partners, council suppliers & contractors, and Council Members
3. Sufficiently considered **potential and real impact** of proposal or policy on service users, residents, employees, partners, council suppliers & contractors, and Council Members.
4. **Systematically recorded and reported** any potential and real impact of your proposal or policy on service users, residents, employees, partners, council suppliers & contractors, and Council Members
5. **Collected, recorded, & reported sufficient information and data** on how your policy or proposal will have an impact.

- 6. Offers **mitigations or adjustments** if a PSED has been impacted.
- 7. Provides clear **justifications** for your decisions.
- 8. It is written in **plain English** with simple short sentence structures.

Section 1: General overview of the activity under consideration

1.	Name of activity being assessed.	Proposed changes to improve the Allocations Scheme for residents in housing need.	2.	The implementation date of the activity under consideration:	This is an EqlA on proposed changes to the Allocations Scheme. Following analysis of the responses to the consultation with tenants, other residents, Registered Providers of social and other key stakeholders a final draft of the proposed new Allocations Scheme has been completed with a summary of the responses to the survey, a copy of this EqlA and final recommendations to be approved by the Cabinet and Council ahead of being implemented at date to be determined in 26/27.
3.	Directorate:	Citizens and City Services	4.	Service Area:	Housing Services
5.	Who is (are) the assessment lead(s): Please provide: -Name -Email address	Tom Porter Senior Service Development Officer tporter@oxford.gov.uk	6.	Contact details, in case there are queries: Please provide: -Name -Email address	Tom Porter Senior Service Development Officer tporter@oxford.gov.uk

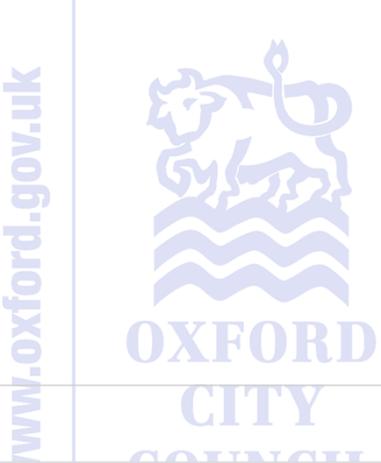
7.	Is this a new or ongoing EqlA?	New	8. If this is an extension of a previous EqlA, please indicate where the previous EqlA is located and share the link to the said EqlA.	Not Applicable
9.	Date this EqlA started:	Nov 25		
10.	Will this EqlA be attached to Corporate Management Team (CMT) reports/updates, which will be published online?			11 Give a date (tentative or otherwise) when this assessment will be taken to the CMT.

Section 2: About the activity, change, or policy that is being assessed.

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12.	Type of activity being considered:	Review of an existing housing policy and the proposed changes to improve the Allocations Scheme for residents in housing need.				
13.	Which priority area(s) within Oxford City Council's Corporate strategy (2024-2028) does this activity fulfil? Please check as needed.	<input checked="" type="checkbox"/> Good, affordable homes	<input type="checkbox"/> Strong, fair economy	<input type="checkbox"/> Thriving Communities	<input type="checkbox"/> Zero Carbon Oxford	<input type="checkbox"/> Well run council

<p>14.</p>	<p>Which priority area(s) within Oxford City Council's Equality, Diversity & Inclusion Strategy (2022) does this activity fulfil?</p> <p>Please check as needed.</p>	<p>Responsive services and customer care.</p>	<p><input type="checkbox"/> Diverse and engaged workforce.</p>	<p>Leadership & organisational commitment.</p>	<p>Understanding and working with our communities.</p>
<p>15.</p>	<p>Outline the aims, objectives, & priorities of the activity being considered.</p>	<p>The Allocations Scheme is the policy the Council uses to allocate social housing within Oxford to those in housing need. It seeks to balance local needs and aspirations with current legislation, guidance and best practice as well as local housing conditions. The Allocations Scheme has a key role in helping to prevent homelessness and to house those in the highest need into the scarce social housing becoming available in the city.</p> <p>As a Local Authority OCC is required to have an Allocations Scheme under Part 6 of the Housing Act 1996. The Allocations Scheme is reviewed periodically to ensure it is kept up to date and to meet any emerging trends such as a rise in homelessness/increase demand for housing.</p> <p>A review of the Allocations Scheme has been completed to help meet current housing challenges the Council is facing and how could the scheme be simplified to increase operational efficiency. Best practice in many other local authorities has been considered as part of this.</p> <p>This has led to proposals which have been consulted on with tenants, other residents and other key stakeholders, these include the following:</p> <ul style="list-style-type: none"> • Increasing priority to help residents need with multiple housing needs at risk of homelessness • Help for residents threatened with homelessness or homeless living in Temporary Accommodation re-housed into Private Rented Sector outside of Oxford through the creation of a new time limited retained priority band. • Introducing changes to help existing tenants requesting to move to more suitable homes and freeing up more high demand social housing; one bed general needs, adapted and family accommodation for households in need. 			

		<ul style="list-style-type: none"> • Changes to supported accommodation move on to help increase throughput from this high demand housing in the city and make the best use of the limited supported housing becoming available for residents who are unable to live independently. • Strengthening the existing approach to make the best use of family housing becoming available for children in housing need and excluding older adult children/non-dependents aged 22+ from inclusion a parent or another’s housing application unless they meet an exception and need to remain – for example to give or receive care etc. • Greater clarity on health and housing assessments within the Allocations Scheme to provide greater transparency, help customers and reduce queries.
16.	<p>Please outline the consequences of not implementing this activity. For example, -Existing activity does not fulfill Corporate Objectives, -existing activity is discriminatory and not fulfilling Council’s PSED, ... to name a few.</p>	<p>The consequence of not updating the Allocations Scheme impacts its effectiveness in helping to deliver key priorities for the residents and the Council.</p> 

Section 3: Understanding service users, residents, staff and any other impacted parties.

17.	<p>Have you undertaken any consultations in the form of surveys, interviews, and/or focus groups?</p>	<p>Following a review of the Allocations Scheme to identify improvements to the existing policy a consultation has taken place with tenants, other residents, Registered Providers of social housing and other key stakeholders requesting feedback and comments on the key areas of the Allocations Scheme which are:</p> <ul style="list-style-type: none"> • Proposed to change • Proposed to stay the same
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	<p>Please provide details— -when, -how many, and -the approach taken.</p>	<p>The responses to the consultation have been reviewed and considered in the drafting of the new Allocations Scheme. A report has been produced providing a summary of the responses and the proposed new Allocations Scheme with recommendations will be submitted to the Cabinet and full Council requesting approval. The new Allocations Scheme will be available to residents on the Council website, housing applicants on the Oxford Register for Affordable Housing and other key stakeholders will be notified</p> <p>This EqIA was shared in a draft form as part of the consultation, helping inform the views of residents/organisations replying to the consultation. Following the closure of the consultation and the feedback received the EqIA has been reviewed.</p>
18.	<p>List information and data used to understand who your residents or staff are and how they will be impacted.</p> <p>These could be— -third-party research, -census data, -legislation, -articles, -reports, -briefs.</p>	<p>Analysis of key data, legislation, guidance and best practice has been undertaken as part of the review of the Allocations Scheme and used to identify areas proposed to keep or change to help the Council deliver housing priorities for residents. Including a review of the:</p> <ul style="list-style-type: none"> • Demand for housing in the city from tenants and other residents in need on the Oxford Register for Affordable housing. • Limited supply of social housing becoming available to let in the city for tenants and other residents in housing need. • Emerging trends – including the rise in homelessness and households in Temporary Accommodation and increase in residents applying for social housing on the Oxford Register for Affordable Housing <p>Responses from tenants, other residents and staff have been considered following the feedback from the consultations on the proposals and this EqIA updated to reflect the responses.</p>
19.	<p>If you have not done any consultations or collected data & information, are you planning to do so in the future?</p>	<p>Not applicable see above.</p>

	<p>Please list the details – -when, -with whom, and -how long will you collect the relevant data.</p>	
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Section 4: Impact analysis.

20.	Who does the activity impact?	Service Users	Yes
	Check as needed.	Members of staff	Yes
	The impact may be positive, negative	General public	Yes
	The impact may be positive, negative		Yes



21.	or unknown.	Partner / Community Organisation	
		City Councillors	Don't Know
		Council suppliers and contractors	No

21. Does the activity impact positively or negatively on any protected characteristics as stated within Equality (Act 2010)?

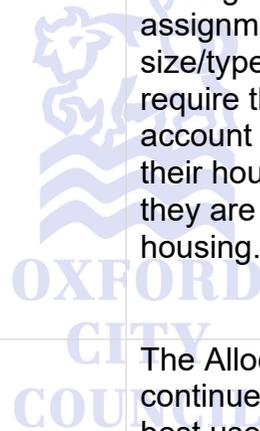
Protected Characteristic	Activity Impact: Positive/Negative/Neutral/Don't know	Data/information/evidence supporting your assessment	Analysis & insight Mitigations
Age	Activity Impact: Positive	The Allocations Scheme continues to aim to make the best use of the limited family housing becoming available and ensure households with children who are homeless, overcrowded, needing to move on health, social and welfare grounds or living in otherwise unsuitable housing are given priority for the limited social housing becoming available in the City. While ensuring exceptions are allowed for older	<p>The Allocations Scheme is kept under review to ensure:</p> <ul style="list-style-type: none"> • family housing continues to be allocated to families with children – except where older adults need to be re-housed with parents because they cannot live alone. • Single/55+ older persons housing continues to be

		<p>adult children/members who need to continue to live with their parents and be re-housed in family housing.</p> <p>One bedroom/55+ older person housing continues to be prioritised for adults in housing need – including those who are homeless, overcrowded, needing to move on health, social and welfare grounds or living in otherwise unsuitable housing or needing to move to alternative more suitable housing.</p>	<p>allocated to residents in the highest housing need.</p> <p>Where a household’s housing need changes this is reflected in the priority for housing/type of accommodation they require.</p> <p>Changes to the Allocations Scheme will further prioritise family housing to households with children, increasing the positive impact.</p>
<p>21 Disability (Visible and invisible)</p>	<p>Activity Impact Positive</p>	<p>The Allocations Scheme continues to aim to make the best use of the limited housing becoming available suitable for households with a disability and ensure priority is awarded to take into account the needs children or adults with a disability affecting their housing.</p> <p>Checks are completed to understand the housing requirements of a household to ensure they are considered for suitable homes.</p> <p>Adapted accommodation continues to be prioritised for households requiring this type</p>	<p>The Allocations Scheme priority bands ensure that the housing need of households with a disability is take into account when assessing housing need.</p> <p>Where a household’s housing requirements change due to a disability this is reflected in the priority for housing awarded and the type of accommodation they require.</p> <p>The housing needs/priority of housing households with a disability are kept under review to reflect any new information received including</p>

		of housing. Including properties with level access shower/stair lifts and wheelchair accessible housing.	recommendations from health professionals affecting their housing requirements.
Gender re-assignment	Activity Impact Positive	The Allocations Scheme continues to aim to make the best use of the limited housing becoming available and prioritise all households in housing need. If a household member is proposing to undergo, undergoing or having undergone a gender re-assignment and this affects the size/type of housing they require this will be taken into account in the assessment of their housing need to ensure they are only offered suitable housing.	The Allocations Scheme priority bands ensure the housing need of households is taken into account and offers of social housing are made to those in the highest need. Including if a household member is proposing to undergo, undergoing or having undergone a gender re-assignment and this affects the size/type of housing they require.
Marriage & Civil Partnership	Activity Impact Neutral	The Allocations Scheme continues to aim to make the best use of the limited housing becoming available and prioritise all households in housing need - including couples who are married or in a civil partnership.	The Allocations Scheme priority bands ensure the housing needs of households is taken into account and offers of social housing are made to those in the highest need. Including those who are married/in a civil partnership.
Race, Ethnicity and/or Citizenship	Activity Impact Positive	The Allocations Scheme continues to aim to make the best use of the limited housing becoming available and	The Allocations Scheme priority bands ensure the housing need of households is taken into account

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Pregnancy & Maternity

Activity Impact Positive

prioritise households in housing need for all residents of Oxford.

The Council's housing and homelessness evidence base (2023) identifies that the black community is disproportionately homeless in Oxford compared to the size in the community. The same evidence base also highlights that Bangladeshi, Pakistani, Mixed White and Asian, and Other Mixed households are more likely to be overcrowded than other households. Therefore, the provisions in the allocations policy given preference to homeless and overcrowded households should benefit these groups.

The Allocations Scheme continues to aim to make the best use of the limited housing becoming available and prioritise all households in housing need - including households who include pregnant women. This includes all single and family households who are homeless, need to move on health or social and welfare

and offers of social housing are made to those in the highest need.

Housing advice and support is provided to all residents in housing need requiring advice on their housing options and information provided in appropriate format/language if needed.

Bangladeshi, Pakistani, Mixed White and Asian, and Other Mixed households are more likely to be overcrowded. These households, if they contain children, will benefit from the changes proposed to the assessment of households with adult non-dependants aged 22+ by the policy, while those households made up of more Non dependants will be negatively impacted.

The Allocations Scheme priority bands ensure the housing need of households is taken into account and offers of social housing are made to those in the highest need. Including where a member of the household is/has been pregnant.

		grounds, overcrowded or living in otherwise unsuitable housing.	
Religion or Belief	Activity Impact Neutral	<p>The Allocations Scheme continues to aim to make the best use of the limited housing becoming available and prioritise households in housing need for all residents of Oxford.</p> <p>This includes all single and family households who are homeless, need to move on health or social and welfare grounds, overcrowded or living in otherwise unsuitable housing.</p>	The Allocations Scheme priority bands ensure the housing need of all households is taken into account and offers of social housing are made to those in the highest need.
220 Sex	Activity Impact Positive	<p>The Allocations Scheme continues to aim to make the best use of the limited housing becoming available and prioritise households in housing need for all residents of Oxford.</p> <p>This includes all single and family households who are homeless, need to move on health or social and welfare grounds, overcrowded or living in otherwise unsuitable housing.</p> <p>Women are disproportionately impacted by domestic abuse, the allocations scheme</p>	The Allocations Scheme priority bands ensure the housing need of all households is taken into account and offers of social housing are made to those in the highest need. Including priority awarded homeless survivors of domestic abuse of which a disproportionate number are women.

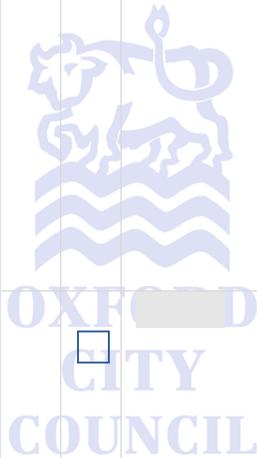
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				prioritises people fleeing domestic abuse.	
Sexual Orientation		Activity Impact Neutral		<p>The Allocations Scheme continues to aim to make the best use of the limited housing becoming available and prioritise households in housing need for all residents of Oxford.</p> <p>This includes all single and family households who are homeless, need to move on health or social and welfare grounds, overcrowded or living in otherwise unsuitable housing.</p>	The Allocations Scheme priority bands ensure the housing needs of all households is taken into account and offers of social housing are made to those in the highest need.
<p>Socio-economic inequalities such as:</p> <p>21</p> <ul style="list-style-type: none"> - income and factors that impact income. -access to jobs <p>This was voluntarily adopted by Oxford City Council on the 13th of March 2024.</p>		Activity Impact Positive		<p>The Allocations Scheme continues to aim to make the best use of the limited housing becoming available and prioritise households in housing need for residents of Oxford.</p> <p>This includes single and family households who are homeless, need to move on health or social and welfare grounds, overcrowded or living in otherwise unsuitable housing affected by socio-economic inequalities unable to secure affordable housing in the city.</p>	The Allocations Scheme qualification criteria and priority bands ensure the housing needs of households is taken into account and offers of social housing are made to those in the highest need.
Other (voluntary consideration)	<input type="checkbox"/>	Activity Impact Positive	<input type="checkbox"/>	The Allocations Scheme continues to aim to make the best use of the limited housing becoming available and	The Allocations Scheme qualification criteria and priority bands ensure the housing needs

<p>Sanctuary seeking status leading to intersecting inequalities experienced by</p> <p>For example:</p> <p>asylum seeker, refugee, person with insecure immigration status</p> <p><u>Oxford City Council became a local authority of sanctuary in December 2024</u>, thereby committing to learn from our experiences, embed inclusive practices and share efforts to create a culture of welcome and safety for all.</p>				<p>prioritise households in housing need for residents of Oxford and those needing to move to the Oxford as a place of safety, including survivors of domestic abuse, conflict and refugees.</p>	<p>of households is taken into account and offers of social housing are made to those in the highest need.</p>
<p>Other</p> <p>For example:</p> <ul style="list-style-type: none"> - Unpaid carers - Prison population - Homeless population -Council suppliers & contractors -Cabinet Members 	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		

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Section 5: Conclusion(s) of your Draft Full Impact Assessment

22.	Conclusions.		<input type="checkbox"/> Stop and reconsider the activity.	<input type="checkbox"/>	Adjust activity before beginning the activity and continue to monitor.	<input checked="" type="checkbox"/> No major change(s) or adjustments and continue with activity but continue to monitor.	<input type="checkbox"/>	No major change(s) or adjustments and continue with the activity. No need to monitor in the future.
23.	Please explain how you have reached your conclusions above.		<div style="text-align: center; font-weight: bold; font-size: 1.2em; margin-bottom: 10px;">COUNCIL</div> Benefits of Implementation: <p>The Allocations Scheme seeks to balance local needs and priorities with current legislation, guidance and best practice as well as local housing conditions. The Allocations Scheme is a key housing policy supporting the priorities of the Housing, Homeless and Rough Sleeping Strategy which include <i>great homes for all, preventing homelessness and adopting a rapid re-housing response, ending rough sleeping</i> benefitting all households with protected characteristics in housing need. A draft EqlA was completed and shared as part of the consultation on the proposals. To reflect part of the Council's housing related commitments within the Equality Impact and Diversity Strategy to provide Responsive Services and Customer Care for those with protected characteristics and to improvement engagement with tenants and residents in housing policy development.</p>					

The proposed revised Allocations Scheme will benefit the majority of residents including households in housing need with protected characteristics, applying for social housing. However, with a finite supply of housing and increasing demand any changes to the relative priority awarded to applicants applying for housing will have an impact on others on the Oxford Register for Affordable Housing. These have been kept to a minimum.

The relative merits of keeping the Allocations Scheme unchanged or making the proposed changes has been carefully considered and the proposals aim to get the balance right to continue to help house Council tenants and other residents in the highest housing need in the City including those in housing need with protected characteristics under the Equality Act.

Balancing Competing Priorities

Awarding higher priority to households threatened with homelessness/living insecure housing with multiple needs will help house residents who would otherwise become homeless and move into temporary accommodation arranged by the Council and require housing. This priority will help vulnerable singles and families to be housed more quickly and avoid the disruption and impact of being required to move to Temporary Accommodation before being housed. The additional priority will only be awarded to applicants with high housing need who would need housing anyway so will have a low impact on other housing applicants. Homeless people in Oxford are disproportionately female, Black, pregnant women, and disabled, compared to the general population, therefore there will be a positive equality impact from these changes for people with these characteristics.

A new priority award, for households at risk of homelessness or homeless living in temporary accommodation, housed by the Council into the private rented accommodation outside of the city will help these residents and increase the number of housing applicants on the Oxford Register for Affordable Housing. However, existing housing applicants in significant, or higher, housing need with an earlier priority date will not be affected and as the award is time limited for 2 years only a low number of housing applicants will qualify for this priority at any point in time having a low impact on others on the housing register. This change will have a positive impact for homeless households with protected characteristics if a move outside of the city is suitable for their needs.

Awarding a new priority award to Council tenants, and other social tenants, requesting to move from high demand housing to homes that better suit their needs will help these tenants – including those who need to move on health or social and welfare grounds or with other protected characteristics. Although this will increase the number of tenants in urgent housing need, this will free up more housing for others housing applicants urgently needing to move to higher demand housing and reduce the time

they wait to be re-housed. Existing applicants in urgent need, including those with protected characteristics, with an earlier priority date will not be disadvantaged and there are only expected to be a low number of tenants requesting to move for this reason at any point in time so the impact on others on the housing register will be low.

The Allocations Scheme seeks to make the best use of the scarce family housing becoming available and will normally only allocate family properties to households with dependent children under 18 or where and exceptions has been agreed that it is reasonable to include an adult on another's housing application – including established household members. Strengthening the existing approach to explicitly state adult children aged 22 or older will be removed from their parent's housing applicant will benefit children in housing need.

There are 259 housing applicants with adult children aged 22+ on the Housing Register – 156 are in high housing need (Bands 1 to 3) and 103 are in lower housing need (Bands 4 to 5). Due to the demand for housing only the 156 in the highest priority bands are likely to qualify for an offer and be affected by the change and many will qualify for an exception. Before implementing this change and to mitigate the impact on the highest priority cases who could be affected a full review of each case in the higher bands will be completed to check whether an exception applies and housing applicants will be given the opportunity provide relevant supporting information.

While some housing applicants with older adult children could be affected – many more families will benefit. There are 1579 families on the housing register with children who would benefit from this change including 1052 in high housing need in (Bands 1 to 3) - including families with children who have been living in unsuitable housing for over 5 years. These changes to increase priority to households with children will have a strong positive impact on those households with children. There will be a mixed impact on other protected characteristics, overcrowded households with children will be prioritised, while overcrowded households made up of non-dependants will be deprioritised, so negatively impacted. The relative benefits and impact of this proposal have been carefully considered and while some households will be impacted – there are exceptions in place to protect those in the highest housing need, including those who with health needs.

Changes to the Housing Register to create a new move on list to help residents to move on from supported housing who no longer require this support will benefit residents, including those with protected characteristics, to move on to settled accommodation and free up spaces for residents requiring support. The impact on other housing applicants will be low. Changes to the Allocations

		<p>Scheme to provide clearer guidance on housing and housing awards will help benefit all residents – including those with protected characteristics</p> <p>The proposals to continue to use qualification criteria to ensure social housing continues to be offered to residents in the highest housing need with a local connection and suitable to be tenants. Exceptions are available to ensure the most vulnerable households, including those without a local connection with protected characteristics are not disadvantaged. The use of priority bands and Choice-Based Lettings will ensure all housing applicants are provided with clear information on the assessment of their housing need, the properties becoming available to let and when they may be made an offer of housing.</p> <p>Tenants requesting to downsize will continue to benefit from high priority to move and support to downsize to more suitable homes and families will benefit from more housing becoming available.</p> <p>Feedback from the responses received from tenants, other residents, Registered Providers of social housing and key stakeholders will be reviewed and influence the final draft of the new Allocations Scheme and Equality Impact Assessment.</p>
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Section 6: Monitoring and review plan.

The responsibility for maintaining a monitoring arrangement of the EqlA action plan lies with the service/team completing the EqlA. These arrangements must be built into the performance management framework such as KPIs or Risk Registers.

24.	<p>Who or which team or service area will be responsible for monitoring equalities impact?</p> <p>For example-</p> <ul style="list-style-type: none"> - team, -directorate, -service area, -Equalities Steering Group,etc. 	<p>Housing Needs Team</p> <hr/> <p>Housing Needs Team</p>
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25.	Who (individual, team, or service area) will be responsible for carrying out the EqlA review?		
26.	How often will the equality impact be reviewed for this activity? For example- -quarterly, -yearly, etc.	Periodically, including when any future changes are made to the Allocations Scheme	27. Date when the EqlA will be reviewed again.

Section 7: Sign-off

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Name:
 Job Title: Senior Service Development Officer
 Signature:

Name:
 Job Title: Head of People
 Signature:
 G Malkin

Name: Richard Wood
 Job Title: Housing Strategy and Needs Manager
 Signature:

Name: Full Name
 Job Title: Type here
 Signature:

Name: Full Name
 Job Title: Type here
 Signature:

Name: Full Name
 Job Title: Type here
 Signature:

Suggested list of people to include are:

- 1) Project lead/manager.
- 2) Head of service area or team.
- 3) Person who completed the EqlA.
- 4) EDI Lead.
- 5) EDI Specialist.
- 6) For joint projects, please consider the following:

1. Other project leads
2. Other service area and/or team lead/manager

Name: Full Name

Job Title: Type here

Signature:

Name: Full Name

Job Title: Type here

Signature:

Name: Full Name

Job Title: Type here

Signature:

You have now reached the end of the assessment.

⚠ Please appended this to any reports and project files for reference.

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