

NORTHAMPTON BOROUGH COUNCIL
Scrutiny Panel 3 – Homelessness (Pre-decision Scrutiny)

Your attendance is requested at a meeting to be held in the Jeffrey Room,
The Guildhall, St. Giles Square, Northampton, NN1 1DE on
Thursday, 21 July 2016 commencing at 6:00pm

D Kennedy
Chief Executive

If you need any advice or information regarding this agenda please phone Tracy Tiff, Scrutiny Officer, direct dial 01604 837408 email ttiff@northampton.gov.uk who will be able to assist with your enquiry. For further information regarding **Scrutiny Panel 3 - Homelessness (Pre-Decision Scrutiny)** please visit the website www.northampton.gov.uk/scrutiny

Members of the Panel

Chair	Councillor Zoe Smith
Deputy Chair	Councillor Terrie Eales
Panel Members	Councillor Rufia Ashraf Councillor Sally Beardsworth Councillor Muna Cali Councillor Vicky Culbard Councillor Janice Duffy Councillor Elizabeth Gowen Councillor Phil Larratt Councillor Dennis Meredith Councillor Samuel Shaw
Co-opted Member	Peter Smith, Head of Head of Strategy & Partnership – North, Homelesslink

Calendar of meetings

Date	Room
22 September 2016 6:00 pm 24 November 26 January 2017 30 March	All meetings to be held in the Jeffery Room at the Guildhall unless otherwise stated

Northampton Borough Scrutiny Panel 3 - Homelessness (Pre-Decision Scrutiny)

Agenda

Item No and Time	Title	Pages	Action required
1. 6:00pm	Apologies		The Chair to note apologies for absence.
2.	Deputations and Public Addresses		<p>The Chair to note public address requests.</p> <p>The public can speak on any agenda item for a maximum of three minutes per speaker per item. You are not required to register your intention to speak in advance but should arrive at the meeting a few minutes early, complete a Public Address Protocol and notify the Scrutiny Officer of your intention to speak.</p>
3.	Declarations of Interest (Including Whipping)		Members to state any interests.
4.	Minutes	1 - 6	Members to approve the minutes of the meeting held on 26 May 2016.
5. 6:05pm	Presentation to set the scene		<p>The Scrutiny Panel to receive a presentation that sets the scene:</p> <ul style="list-style-type: none"> ➤ Definitions – Homelessness and Rough Sleepers ➤ Homelessness Legislation ➤ Causes and effects of Homelessness, including Rough Sleeping ➤ Relevant Council Policies and Strategies ➤ Statistics: <ul style="list-style-type: none"> Rough sleeper data Homelessness data
6. 7:05pm	Core Questions		The Scrutiny Panel to devise a list of core questions to be put to the expert advisors.
7. 7:15pm	Site Visit	7	The Scrutiny Panel to consider a site visit(s) to inform its evidence base.
8. 7:25pm	Community Impact Assessment	8 - 16	The Scrutiny Panel to approve the Community Impact Assessment (CIA) for the Review.

NORTHAMPTON BOROUGH COUNCIL

MINUTES OF SCRUTINY PANEL 3 - HOMELESSNESS (PRE-DECISION SCRUTINY)

Thursday, 26 May 2016

COUNCILLORS PRESENT: Councillor Zoe Smith (Chair), Councillor Terrie Eales (Deputy Chair); Councillors Vicky Culbard, Janice Duffy, Terrie Eales, Elizabeth Gowen and Samuel Shaw

OFFICERS Phil Harris, Head of Housing and Wellbeing
Tracy Tiff, Scrutiny Officer

1. APOLOGIES

An apology for absence was received from Councillor Sally Beardsworth.

2. DECLARATIONS OF INTEREST

There were none.

3. DEPUTATIONS/PUBLIC ADDRESS

There were none.

4. DEPUTY CHAIR OF THE SCRUTINY PANEL

It was proposed by Councillor Elizabeth Gowen and seconded by Councillor Vicky Culbard that Councillor Terrie Eales is elected Deputy Chair of this Scrutiny Panel.

AGREED: That Councillor Terrie Eales is elected Deputy Chair of this Scrutiny Panel.

5. SCOPE OF THE REVIEW

The Chair presented the draft scope of the Review for consideration.

The Scrutiny Panel suggested potential questions to be put to the expert advisors at future meetings:

What is the Council doing in respect of empty homes in the borough?

It was acknowledged that the way Rough Sleepers are counted would be included within the presentation to the next meeting, but it was felt this could be a core question also

The Scrutiny Panel noted that “legal highs” are a cause of homelessness and a barrier to getting a home.

The Scrutiny Panel scoped its review, making suggestions and additions to the draft scope. The scope would be presented to the Overview and Scrutiny Committee at its meeting on 13 June 2016 for approval.

AGREED: (1) That the scope of this Scrutiny Review is presented to the Overview and Scrutiny Committee at its meeting on 13 June 2016 for approval. A copy of the Scope is appended to the minutes.

The meeting concluded at 6:20 pm



OVERVIEW AND SCRUTINY

SCRUTINY PANEL 3 - HOMELESSNESS (PRE DECISION SCRUTINY)

1. Purpose/Objectives of the Review

- Pre-Decision Scrutiny: To review how the Borough Council and its partners prevent homelessness and respond to those without homes in the borough

Key Lines of Enquiry

- To gain an understanding of the work currently being undertaken by Northampton Borough Council (NBC), partnerships, statutory and voluntary organisations to address homelessness
- To assess the extent of homelessness and rough sleeping in the borough assess the initiatives currently in place to tackle homelessness
- To examine the Council's Severe Weather Provision
- To gain an understanding of the effect on the health, wellbeing and the safety of homelessness people, including rough sleepers
- To gain an understanding of the causes and barriers to support homelessness
- Identify any specific groups that are not accessing services

2. Outcomes Required

- To reduce homelessness in the borough of Northampton
- An understanding of the local authority homelessness role and the services provided in Northampton
- A review of existing homelessness services in Northampton, in order to assess their quality and effectiveness and identify any significant gaps in service

3. Information Required

- Background data
- Background reports
- Best practice data
- Desktop research
- Evidence from expert internal witnesses
- Evidence from expert external witnesses
- Site visits (if applicable)

4. Format of Information

- Background data, including:
 - Presentation to set the scene: To identify the prevalence of the problem locally
 - Relevant national and local background research papers
 - Definitions – Homelessness and Rough Sleepers
 - Homelessness Legislation
 - Causes of Homelessness, including Rough Sleeping
 - Relevant Council Policies and Strategies
 - Statistics:
 - Rough sleeper data
 - Homelessness data
 - Relevant Legislation:
 - Welfare Reform Act 2012
 - Localism Act 2011
 - Homelessness Act 2002
 - The Health and Social Care Act 2012
 - Relevant published papers on homelessness and rough sleeping
- Best practice external to Northampton
- Internal expert advisors:
 - Cabinet Member for Housing, NBC
 - Housing Options and Advice Manager, NBC

- Head of Revenues and Benefits, LGSS
 - Cabinet Member for Community Safety, NBC
 - Chair of the Community Safety Partnership (CSP) and the Community Safety Team
 - Case Managers, Anti-Social Behaviour Unit
- External expert advisors:
 - Head of Protecting Vulnerable Persons, Northamptonshire Police
 - Director of Public Health, Northamptonshire County Council
 - Manager, Hope Centre
 - Manager, Maple Access
 - Manager, NAASH
 - Drug and Alcohol Challenge Officer, the Bridge
 - Operations Manager, Midland Heart Housing Association
 - Service Manager, Salvation Army
 - Chief Executive, Central Northamptonshire CAB
 - Emmaus, Homelessness Charity
 - Shelter
 - Crisis
 - Healthwatch Northamptonshire
 - Site visit to temporary accommodation(s) and Oasis House

5. Methods Used to Gather Information

- Minutes of meetings
- Desktop research
- Site visits
- Officer reports
- Presentations
- Examples of best practice
- Witness Evidence:-
 - Key witnesses as detailed in section 4 of this scope

6. Co-Options to the Review

- Senior Officers, Chartered Institute of Housing (CIH) and Homeless Link to be approached suggesting that they are co-opted to this Review for its life.

7. Community Impact Screening Assessment

- A Community Impact Screening Assessment to be undertaken on the scope of the Review

8. Evidence gathering Timetable

May 2016 – March 2017

- 26 May 2016 - Scoping meeting
- 21 July - Evidence gathering
- 22 September - Evidence gathering
- 24 November - Evidence gathering
- 26 January 2017 - Evidence gathering
- 30 March - Approval final report

Various site visits will be programmed during this period, if required.

Meetings to commence at 6.00 pm

9. Responsible Officers

Lead Officer Phil Harris, Head of Housing and Wellbeing
Co-ordinator Tracy Tiff, Scrutiny Officer

10. Resources and Budgets

Phil Harris, Head of Housing and Wellbeing, to provide internal advice.

11. Final report presented by:

Completed by March 2017. Presented by the Chair of the Panel to the Overview and Scrutiny Committee and then to Cabinet.

12. Monitoring procedure:

Review the impact of the report after six months (approximately November/December 2017)



NORTHAMPTON
BOROUGH COUNCIL

NORTHAMPTON BOROUGH COUNCIL

OVERVIEW AND SCRUTINY

SCRUTINY PANEL 3– HOMELESSNESS (PRE-DECISION SCRUTINY)

21 JULY 2016

BRIEFING NOTE: POTENTIAL SITE VISITS

1 Introduction

- 1.1 The Scrutiny Panel, at its inaugural scoping meeting, agreed that there was a need for a site visit to take place to a sample of temporary accommodation in the borough and to Oasis House.

2 Information

- 2.1 Desktop research will be undertaken regarding best practice initiatives both in Northampton and external to the town. A briefing note detailing the findings will be presented to a future meeting of the Scrutiny Panel.

3 Site visit proposal

- 3.1 It is proposed that a site visit is arranged for representatives of the Scrutiny Panel to visit a sample of temporary accommodation in the borough. The findings of which will inform the evidence base of this Scrutiny Review.
- 3.2 It is further proposed that representatives of the Scrutiny Panel visit Oasis House. The findings of which will inform the evidence base of this Scrutiny Review.

4 Recommendations

- 4.1 That the Scrutiny Officer makes arrangements for representatives of the Scrutiny Panel to visit a sample of temporary accommodation in the borough.
- 4.2 That the Scrutiny Officer makes arrangements for representatives of the Scrutiny Panel visit Oasis House.
- 4.3 That a report back on the findings of the site visits is presented to a future meeting of this Scrutiny Panel.
- 4.4 That a report back on the findings of the desktop research is presented to a future meeting of this Scrutiny Panel.

Author: Tracy Tiff, Scrutiny Officer, on behalf of Councillor Zoe Smith, Chair, Scrutiny Panel 3 – Homelessness (Pre-Decision Scrutiny)

Date: 9 June 2016

Community Impact Assessment

(Incorporating equality analysis and health considerations)

V2.0

Name of Matter Assessed:

Overview and Scrutiny Review – Homelessness (Pre-Decision Scrutiny)

Who will make the decision:
(e.g. Cabinet/Board etc.)

Overview and Scrutiny will produce a report with its evidence, findings and recommendations and the Chair of the Overview and Scrutiny Committee will present this report to Cabinet for its consideration.

Who has been involved in developing the matter:

Head of Service:	Phil Harris, Head of Housing and Wellbeing
Lead Officer:	Tracy Tiff, Scrutiny Officer
Chair of the Scrutiny Panel:	Councillor Zoe Smith

What is it:

A Community Impact Assessment (CIA) is a document that summarises how the council has had due regard to the public sector equality duty (Equality Act 2010) in decision-making. This document can also be used to consider health and narrowing health inequalities (Health and Care Act 2012)

When to assess:

A CIA should be carried out when you are changing, removing or introducing a new service, policy or function. The assessment should be proportionate; a major financial decision will need to be assessed more closely than a minor policy change.

Due Regard:

To ‘have due regard’ means that in making decisions and in its other day-to-day activities the council must consciously consider the need to do the things set out in the general equality duty: eliminate discrimination, advance equality of opportunity and foster good relations.

In relation to health, we need to consider the potential short term and long term implication of for decisions that we take to support the Health and Wellbeing agendas.

How much regard is ‘due’ will depend on the circumstances and in particular on the relevance of the aims in the general equality duty to the decision or function in question. The greater the relevance and potential impact, the higher the regard required by the duty. We need to make sure that we understand the potential impact of decisions on people with different protected characteristics and also need to consider this information before and as decisions are being made. This will help us to reduce or remove unhelpful impacts and inequalities

Proposal Name:

Overview and Scrutiny Review – Homelessness (Pre-Decision Scrutiny)

Aims/Objectives and purpose of the policy/service/function

Aims and objectives:

Purpose/Objectives of the Review

- Pre-Decision Scrutiny: To review how the Borough Council and its partners prevent homelessness and respond to those without homes in the borough

Key Lines of Enquiry

- To gain an understanding of the work currently being undertaken by Northampton Borough Council (NBC), partnerships, statutory and voluntary organisations to address homelessness
- To assess the extent of homelessness and rough sleeping in the borough assess the initiatives currently in place to tackle homelessness
- To examine the Council's Severe Weather Provision
- To gain an understanding of the effect on the health, wellbeing and the safety of homelessness people, including rough sleepers
- To gain an understanding of the causes and barriers to support homelessness
- Identify any specific groups that are not accessing services

Key actions:

Overview and Scrutiny (O&S) is a means of providing non-Executive Councillors the opportunity to inform policy development and critical friend challenge to the Council's Executive policy makers and decision makers (Cabinet). It also has a strong role in promoting the engagement of non-Executive Councillors in a diverse range of policy development activities, including performance improvement at the Council. Scrutiny aims to engage the community in its work either by attendance at meetings, public addresses to meetings, witness evidence, or co-optees to Scrutiny Reviews.

This Review will hear from a number of key stakeholders to ensure that a wide range of evidence is obtained to inform the Panel's information base.

The projected outcome of this Scrutiny Review is:

- To reduce homelessness in the borough of Northampton
- An understanding of the local authority homelessness role and the services provided in Northampton
- A review of existing homelessness services in Northampton, in order to assess their quality and effectiveness and identify any significant gaps in service

All Scrutiny Reviews link to the Council's Corporate Plan. Details of which are evidenced within the final report. In particular, this Scrutiny Review links to corporate priority 5 – Better homes for the future – helping you to have a home

Expected outcomes:

- To reduce homelessness in the borough of Northampton
- An understanding of the local authority homelessness role and the services provided in Northampton
- A review of existing homelessness services in Northampton, in order to assess their quality and effectiveness and identify any significant gaps in service

Who will be affected and how:

Overview and Scrutiny ensures that it adheres to the Council's statutory duty to provide the public with access to Scrutiny reports/agendas/minutes and other such documents. Meetings of the Overview and Scrutiny Committee/Scrutiny Panels are widely publicised, i.e.: on the Council's website, copies issues to the local media and paper copies available in the Council's One Stop Shop and local libraries.

This Scrutiny Review will look at issues such as how the Borough Council and its partners prevent homelessness and respond to those without homes in the borough

The Scrutiny Panel, in having regard to the general equality duty, will be mindful of the protected characteristics when undertaking this scrutiny activity; so that any recommendations that it made could identify disproportionate and unintended potential positive and negative impacts on any particular sector of the community, including any potential mitigation required. This will be borne in mind as the Scrutiny Panel progresses with the review and evidence is gathered.

In order that the Scrutiny Panel obtains a wide range of views, a number of key witnesses will provide evidence :

- Internal expert advisors:
 - Cabinet Member for Housing and Wellbeing, NBC
 - Housing Options and Advice Manager, NBC
 - Head of Revenues and Benefits, LGSS
 - Cabinet Member for Community Safety, NBC
 - Chair of the Community Safety Partnership (CSP) and the Community Safety Team
 - Case Managers, Anti-Social Behaviour Unit
- External expert advisors:
 - Head of Protecting Vulnerable Persons, Northamptonshire Police
 - Director of Public Health, Northamptonshire County Council
 - Manager, Hope Centre
 - Manager, Maple Access
 - Manager, NAASH
 - Drug and Alcohol Challenge Officer, the Bridge
 - Operations Manager, Midland Heart Housing Association
 - Service Manager, Salvation Army
 - Chief Executive, Central Northamptonshire CAB
 - Emmaus, Homelessness Charity
 - Shelter

- Crisis
- Healthwatch Northamptonshire

- Site visit to temporary accommodation(s) and Oasis House

Any recommendations that explore ways of working, training and employment opportunities enabling income inequality to be addressed will consider impact and potential mitigation as appropriate and relevant across all protected characteristics. Impact assessments will be integral to any reports including actions plans.

Approximately how many people will be affected:

The impact of the Scrutiny report cannot be assessed until, at the earliest, an outline of a report has been developed. Therefore, within the Scrutiny Panel’s report it could suggest that any impact on the nine protected characteristics be taken into account.

However, any potential recommendations could have an effect on the community of the borough of Northampton, including:

- All residents
- Community Groups
- Key Partners

Expected date of decision:

It is anticipated that the report of the Scrutiny Panel will be concluded in March 2017, presented to the Overview and Scrutiny Committee in April 2017 and to Cabinet in approximately July 2017. Cabinet will then become responsible for delivering the recommendations that it accepts.

Scope/focus of the assessment:

Please outline the scope and focus of the assessment:

The Scrutiny Panel is mindful of the nine protected characteristics when undertaking scrutiny activity so that any recommendations that it makes can identify potential positive and negative impacts on any particular sector of the community. This will be borne in mind as the Scrutiny Review progresses and evidence is gathered. The final report of the Scrutiny Panel has a standard section entitled Community Impact Assessment and details the findings

Any potential recommendations proposed by the Scrutiny Panel may have perceived adverse and beneficial effects for all diversity groups.

Evidence gathered from the key witnesses will be analysed and contained within the Scrutiny Panel’s final report. The comments of the key witnesses will be minuted and published publicly within the [Council’s meeting management system](#).

Should the Scrutiny Panel conclude the need for recommendations for change; the expected impact of these changes will be detailed within the Scrutiny Panel’s final report.

The Scrutiny Panel’s report, after it has been endorsed by the Overview and Scrutiny Committee, will be forwarded to the Council’s Cabinet for consideration; Cabinet will then become responsible for delivering the recommendations that it accepts.

This Scrutiny Review will investigate how the Borough Council and its partners prevent homelessness and respond to those without homes in the borough

The Scrutiny Panel, in having regard to the general equality duty, will be mindful of the protected characteristics when undertaking this scrutiny activity; so that any recommendations that it made could identify disproportionate and unintended potential positive and negative impacts on any particular sector of the community, including any potential mitigation required. This will be borne in mind as the Scrutiny Panel progresses with the review and evidence is gathered.

Any recommendations that explore ways of looking at how partners, locally, including the private sector, can work together in tackling homelessness and will consider impact and potential mitigation as appropriate and relevant across all protected characteristics. Impact assessments will be integral to any reports including actions plans.

Community Screening Outcome

Will the proposal:	Yes/No
Eliminate discrimination, harassment or victimisation	Yes
Advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it	Yes
Foster good relations between persons who share a relevant protected characteristic and persons who do not share it	Yes
Contribute towards health improvements or inequalities	Yes

Relevant data and/or research

Outline the information and research that has informed the decision:

The number of public attending the Scrutiny Panel meetings is recorded.

Any feedback received from the above is taken into consideration and used to formulate recommendations to improve the Service.

Background data will provided to the Panel including:

Background data, including:

- Presentation to set the scene: To identify the prevalence of the problem locally
- Relevant national and local background research papers
- Definitions – Homelessness and Rough Sleepers
- Homelessness Legislation
- Causes of Homelessness, including Rough Sleeping
- Relevant Council Policies and Strategies
- Statistics:
 - Rough sleeper data
 - Homelessness data

- Relevant Legislation:
 - Welfare Reform Act 2012
 - Localism Act 2011
 - Homelessness Act 2002
 - The Health and Social Care Act 2012
- Relevant published papers on homelessness and rough sleeping

Details of Best practice and successful initiatives external to Northampton and comparable Local Authorities will help to inform the evidence base.

Rationale for change

What will you do if/when changes are agreed/introduced:

The purpose of this Scrutiny Review is

- Pre-Decision Scrutiny: To review how the Borough Council and its partners prevent homelessness and respond to those without homes in the borough

Key Lines of Enquiry

- To gain an understanding of the work currently being undertaken by Northampton Borough Council (NBC), partnerships, statutory and voluntary organisations to address homelessness
- To assess the extent of homelessness and rough sleeping in the borough assess the initiatives currently in place to tackle homelessness
- To examine the Council's Severe Weather Provision
- To gain an understanding of the effect on the health, wellbeing and the safety of homelessness people, including rough sleepers
- To gain an understanding of the causes and barriers to support homelessness
- Identify any specific groups that are not accessing services

Identification of affected groups/individuals

List the groups/individuals that may be affected by the proposal:

Any potential recommendations could have an effect on the community of the borough of Northampton, including:

- All residents
- Community Groups
- Key Partners

Assess and/or undertake Consultation

Has there been specific consultation on this decision (if not, state why not and/or when this may happen):

As part of the evidence gathering for this Scrutiny Review, a number of expert advisers will be consulted

What were the results of the consultation:

Consultation with various expert advisers will take place over a series of scheduled meetings, the outcomes of which will inform the evidence base of the Scrutiny Review, which will inform the findings, conclusions and recommendations of the Scrutiny Panel.

Across the protected characteristics, what difference in views did analysis of the consultation reveal:

Evidence gathered from all sources will be analysed and contained within the Scrutiny Panel's final report.

What conclusions have been drawn from the analysis on how the decision will affect people with different protected characteristics:

The Scrutiny Panel will, after completion of its evidence gathering, formulate conclusions and recommendations as appropriate, which will have the intended purpose of recommending a system of community participation and involvement with other Agencies and interested parties. Recommendations will link to SMART (Specific, Measurable, Achievable, Realistic and Time) objectives. Should the recommendations be accepted by the Council's Cabinet, they will then be implemented and necessary actions drawn up.

Assessment of impact on staff

Please give details of impact on staff, including staffing profile if/as appropriate:

The Scrutiny Panel will, after completion of its evidence gathering, formulate conclusions and recommendations as appropriate, which will have the intended purpose of recommending a system of community participation and involvement with other Agencies and interested parties. Recommendations will link to SMART (Specific, Measurable, Achievable, Realistic and Time) objectives. Should the recommendations be accepted by the Council's Cabinet, they will then be implemented and necessary actions drawn up.

Assessment of impact on wider community

Please give details of any impacts to the community as a whole:

The Scrutiny Panel will, after completion of its evidence gathering, formulate conclusions and recommendations as appropriate, which will have the intended purpose of recommending a system of community participation and involvement with other Agencies and interested parties. Recommendations will link to SMART (Specific, Measurable, Achievable, Realistic and Time) objectives. Should the recommendations be accepted by the Council's Cabinet, they will then be implemented and necessary actions drawn up.

Analysis of impact by protected characteristics

Assess the relevance and impact of the decision to people with different characteristics

Any issues around the findings which may impact on the 9 protected characteristics:

- Age
- Disability
- Gender reassignment
- Marriage and civil partnership
- Pregnancy and maternity
- Race
- Religion or belief
- Sex
- Sexual Orientation
- Other socially excluded groups

Will be addressed as part of the report and recommendations of the Scrutiny Panel.

Mitigation of adverse impact on staff/service/people

Where any negative impact has been identified, please outline the measures taken to mitigate against it:

N/A

Publication of results

This Impact Assessment will be published on the Council's website

Monitoring and review

Please give details of how the changes will be monitored, and when the next review is due:

Recommendations contained within the report of the Scrutiny Panel will link to SMART (Specific, Measurable, Achievable, Realistic and Time) objectives. Should the recommendations be accepted by the Council's Cabinet, they will then be implemented and necessary actions drawn up.

The Scrutiny Panel's report, after it has been endorsed by the Overview and Scrutiny Committee, will be forwarded to the Council's Cabinet for consideration; Cabinet will then become responsible for delivering the recommendations that it accepts.

The impact of the accepted recommendations contained with the final report of the Scrutiny Panel will be monitored six months after they have been accepted by Cabinet.

Conclusion

There should be no unlawful discrimination arising from the decision.

Please state how "Due regard" has been taken to the equality duty, and public health considerations:

The impact of the Scrutiny report cannot be assessed until, at the earliest, an outline of a report has been developed. Therefore, with the report of the Scrutiny Panel it could suggest that any impact on the nine protected characteristics be taken into account.

Please advise on the overall equality implications that should be taken into account in the final decision, considering relevance and impact:

The impact of the Scrutiny report cannot be assessed until, at the earliest, an outline of a report has been developed. Therefore, with the report of the Scrutiny Panel it could suggest that any impact on the nine protected characteristics be taken into account.

Signed:

Date: