

1. Background and objectives

- 1.1. Breathing in air containing asbestos fibres can lead to asbestos-related diseases, mainly cancer of the lungs and chest lining. Asbestos is only a risk to health if asbestos fibres are released into the air and breathed in. Past exposure to asbestos currently kills around 4,500 people a year in Great Britain.
- 1.2. There is usually a long delay between first exposure to asbestos and the onset of the disease (15-60 years). Only by preventing or minimising these exposures now can asbestos-related disease eventually be reduced.
- 1.3. Any Alliance home or building built or refurbished before the year 2000 may contain asbestos. As long as the asbestos containing material (ACM) is in good condition and is not going to be disturbed or damaged, there is negligible risk. However, if it is disturbed or damaged it can become a danger to health, because people may breathe in any asbestos fibres released into the air. Workers who carry out repairs and maintenance work are at particular risk. If asbestos is present and can readily be disturbed, is in poor condition and not managed properly, others who may be occupying the homes or buildings could also be put at risk.
- 1.4. Alliance is responsible for the maintenance and repairs to homes, non-domestic (communal blocks) and 'other' properties (e.g. offices, commercial shops, depots, etc.), many of which will have been constructed using asbestos containing materials. As such, the organisation has a legal 'duty to manage' asbestos in its homes and buildings and this must be done in accordance with The Control of Asbestos Regulations (CAR) 2012
- 1.5. Alliance must establish a policy which meets the requirements of The Control of Asbestos Regulations (CAR) 2012, which came into force on 6th April 2012. In addition to this, the policy must provide assurance to Alliance that measures are in place to identify, manage and/or mitigate risks associated with asbestos.
- 1.6. Alliance must also ensure that compliance with asbestos is formally reported at Strategic Leadership Team (SLT) and Board level, including the details of any non-compliance and planned corrective actions.
- 1.7. The policy is relevant to all Alliance colleagues, customers, contractors and other persons or other stakeholders who may work on, occupy, visit, or use its premises, or who may be affected by its activities or services.
- 1.8. It should be used by all to ensure they understand the obligations placed upon Alliance to maintain a safe environment for customers and employees within the homes of each customer, and within all communal areas of buildings and 'other' properties (owned and managed).

2. Policy detail

2.1. Regulatory Standards, Legislation and Codes of Practice

- 2.1.1. Regulatory Standards – the application of this policy will ensure compliance with the regulatory framework and consumer standards (Home Standard) for social housing in England, and the safety and quality standard (derived from the Social Housing (regulation) Act 2024) which were introduced by the Regulator of Social Housing (RSH).
- 2.1.2. Legislation – the principal legislation applicable to this policy is The Control of Asbestos Regulations (CAR) 2012, which came into force on 6th April 2012. Alliance has a legal obligation under Part 2, Section 4 of the legislation (Duty to manage asbestos in non-domestic properties) and is the 'Duty Holder' for the purposes of the legislation. Alliance is the 'duty holder' by virtue of the fact that they own and manage homes and buildings, house customers and leaseholders through the tenancy and lease agreement obligations it has, and they have a duty in respect of employees who will work in buildings which contain asbestos materials.
- 2.1.3. Code of Practice – the principal approved codes of practice and guidance applicable to this policy are:
- ACoP L143 - 'Managing and working with Asbestos' (2nd edition December 2013)
 - HSG264 – 'Asbestos: The survey guide' (2nd edition 2012)
 - HSG248 – 'Asbestos: The analysts guide' (2nd edition 2021)
 - HSG247 – 'Asbestos: The licenced contractors' guide' (1st edition 2006)
 - HSG210 – 'Asbestos Essentials – A task manual for building, maintenance and allied trades and non-licenced asbestos work' (4th edition 2018).
- 2.1.4. Sanctions – Alliance acknowledges and accepts its responsibilities in accordance with the regulatory standards, legislation, and approved codes of practice, and that failure to discharge these responsibilities properly could lead to a range of sanctions including prosecution by the Health & Safety Executive under the Health & Safety at Work Act 1974, prosecution under the Corporate Manslaughter and Corporate Homicide Act 2007 and via action taken by the Regulator of Social Housing (RSH).
- 2.1.5. Customers – Alliance will use the legal remedies available within the terms of the tenancy and lease agreement should any customer refuse access to carry out essential asbestos related inspection and remediation works.
- Non-Access: We will agree an appointment with the customer to carry out the inspections or works. If the customer is not available, on the day, or refuses

access, we will agree a second appointment. If this second appointment is not kept a 'no access' process will be initiated, which may result in legal action being taken to gain access.

2.2. Additional legislation

2.1.1. This asbestos policy also operates in the context of the following additional legislation:

- Health and Safety at Work Act
- The Management of Health and Safety at Work Regulations 1999
- The Workplace (Health, Safety & Welfare) Regulations 1992
- Personal Protective Equipment at Work Regulations 1992
- Hazardous Waste (England & Wales) Regulations 2005 (Amendment 2019)
- Control of Substances Hazardous to Health (COSHH) Regulations (as amended) 2002
- Construction, Design and Management Regulations 2015
- Defective Premises Act 1972
- Landlord and Tenant Act 1985
- Data Protection Act 2018
- The Social Housing (regulation) Act 2023
- RIDDOR 2013
- The Building Safety Act 2022.

2.3. Obligations

2.3.1. The duty to manage asbestos is included in The Control of Asbestos Regulations (CAR) 2012. The duty requires Alliance to manage the risk from asbestos by:

- Finding out if there is asbestos in the homes and buildings owned and managed by the organisation (or assessing if asbestos containing materials are liable to be present and making a presumption that materials contain asbestos, unless the organisation has strong evidence that they do not), identifying its location and identifying what condition it is in. If the home or building was built prior to the year 2000 the organisation will assume asbestos is present. If the home or building was built after the year 2000 asbestos is unlikely to be present and no further action will be required.
- Making and keeping an up-to-date record (referred to as the 'asbestos register') of the location and condition of the asbestos containing materials or presumed asbestos containing materials in the homes and buildings owned and managed by the organisation.

- Assessing the risk from the asbestos containing materials found.
- Preparing an Asbestos Management Plan that sets out in detail how the organisation is going to manage the risk from the asbestos containing materials.
- Taking the steps needed to put the asbestos management plan into action.
- Reviewing and monitoring the asbestos management plan and the arrangements made to put it in place.
- Setting up a system for providing information on the location and condition of the asbestos containing materials to anyone who is liable to work on or disturb these materials.

2.3.2. Anyone who has information on the whereabouts of asbestos in homes and buildings is required to make this available to the organisation as the 'duty holder', but the organisation then have to assess its reliability.

2.3.3. Those who are not duty holders, but control access to the organisation's homes or buildings, have to co-operate with the organisation in managing the asbestos present.

2.4. Statement of Intent

2.4.1. Alliance acknowledges and accepts its responsibilities under the Control of Asbestos Regulations (CAR) 2012.

2.4.2. Alliance recognises that the main hazard in relation to asbestos is the non-identification of asbestos and asbestos containing materials and as such will protect those persons potentially exposed to asbestos as far as is reasonably practical by minimising the exposure through the use of appropriate control measures and working methods.

2.4.3. Alliance accepts that asbestos is likely to be present in the majority of its properties built prior to the year 2000 and will therefore manage these properties accordingly.

2.4.4. In order to fully comply with the legislation Alliance will have a Board approved Asbestos Policy. In addition, the organisation will have an Asbestos Management Plan and an Asbestos Register which will hold records of the assets which have asbestos containing materials in them.

2.4.5. Alliance will hold accurate records against each property it owns or manages, identifying whether the property has had its initial asbestos management survey and when the next re-inspection is due, where applicable.

2.4.6. Asbestos management survey dates and asbestos re-inspection survey dates, details of ACMs and asbestos management survey reports are to be held in an appropriate asset management system.

- 2.4.7. Alliance will employ competent individuals and contractors who are UKAS accredited to undertake asbestos management surveys, refurbishment and demolition surveys and sampling. All surveys to be relied upon will have been produced after 6th April 2012.
- 2.4.8. Alliance will employ in-house P402 qualified surveyors to carry out asbestos re-inspection surveys only to establish if asbestos containing materials have deteriorated in any way. These re-inspection surveys will be subject to regular monthly external auditing by a UKAS accredited asbestos consultancy.
- 2.4.9. Licensed asbestos removal operatives and/or contractors will be employed to carry out remediation works (where necessary) to non-domestic (communal blocks/'other' properties) and domestic properties as outlined in section 2.6 of this policy
- 2.4.10. Domestic properties will include all empty homes (voids) where repairs or maintenance work is taking place and is likely to disturb any asbestos containing materials within these properties. Domestic properties will also include any tenanted properties where repairs or maintenance work is taking place and is likely to disturb any asbestos containing materials within these properties.
- 2.4.11. Alliance will also undertake an intrusive refurbishment and demolition (R&D) survey to domestic and non-domestic properties, prior to planned maintenance works taking place, to the areas within the property that are likely to be disturbed as part of the proposed works. They will also undertake a management survey to the remainder of the property as part of the same R&D survey. This will be in accordance with the criteria set out in the Alliance Asbestos Management Plan, which should be read in conjunction with this policy.
- 2.4.12. Alliance considers good communication essential in the safe delivery of asbestos management and will therefore ensure that information about asbestos containing materials (known or suspect) is provided to every person liable to disturb it, accidentally or during the course of the work. This includes employees and customers.
- 2.4.13. Alliance will ensure all employees, operatives and contractors have adequate asbestos survey information to enable them to manage and/or work safely with asbestos. In addition, Alliance will secure adequate records from those they work on behalf of, to fulfil this requirement.
- 2.4.14. Alliance will make information available to customers regarding asbestos containing materials through information held on the organisation's website and other agreed customer channels.
- 2.4.15. Alliance will ensure that all relevant visitors (e.g. contractors) are made aware of the Asbestos Register and the emergency arrangements on site.

2.5. Compliance Risk Assessment / Inspection Programmes

- 2.5.1. Non-Domestic Stock (communal Blocks) or 'other' properties – Alliance will review existing asbestos management survey information prior to carrying out any repairs or planned maintenance works which may involve working on, or adjacent to, any asbestos containing materials within a non-domestic (communal block) or 'other' properties (e.g. offices, commercial shops, depots, etc.). This is to ensure that any asbestos containing materials likely to pose a risk are identified prior to works commencing and the details passed onto the relevant operatives or external contractors and managed in an appropriate way. Where required a new hybrid R&D/management survey should be commissioned prior to work commencing.
- 2.5.2. Alliance will ensure that all non-domestic (communal blocks) and 'other' properties in ownership or management have an initial asbestos management survey carried out. All surveys will comply with the CAR 2012 legislation and therefore be dated after 6th April 2012 when the legislation came into effect.
- 2.5.3. Thereafter all non-domestic (communal blocks) and 'other' properties will have a re-inspection survey and an assigned re-inspection date where applicable. This date will be in accordance with the specific needs of the building. It will either be annually (for communal blocks) or at a period dictated by the previous survey/re-inspection. Re-inspection dates may change following the re-categorisation of a property or a building.
- 2.5.4. Alliance will not need to re-inspect any non-domestic (communal blocks) or 'other' properties built after the year 2000, or where the initial asbestos management survey confirms that there are no asbestos containing materials present.
- 2.5.5. Domestic Stock - Alliance will review existing asbestos management survey information prior to carrying out any void repairs, day to day repairs, or planned maintenance works which may involve working on or adjacent to any asbestos containing materials within a domestic property. This is to ensure that any asbestos containing materials likely to pose a risk are identified prior to works commencing and the details passed onto the relevant operatives or external contractors and managed in an appropriate way. Alliance will supplement this by re-inspecting all domestic properties on a 5-year cycle. Where high risk materials are found the re-inspection will be annual.
- 2.5.6. Where there is no previous asbestos related information in respect of a domestic property which requires an asbestos survey ahead of void repairs, day-to-day repairs or planned maintenance work, a hybrid R&D/management survey will be undertaken, and the scope of the survey agreed in accordance with the works due to be carried out. If the void only requires the standard safety checks (gas, electric and EPC) and there is no intrusive repair work, an asbestos survey is not required.
- 2.5.7. Alliance will not need to re-inspect any domestic properties built after the year 2000, or where the initial asbestos management survey confirms that there are no asbestos containing materials present.

- 2.5.8. Refurbishment Work - Alliance will undertake an intrusive refurbishment and demolition (R&D) survey to domestic, non-domestic (communal blocks) and 'other' properties prior to planned maintenance works taking place to the areas of the property that are likely to be disturbed as part of the proposed works. They will also undertake a management survey to the remainder of the property as part of the same R&D survey. This will be in accordance with the criteria set out in Alliance's Asbestos Management Plan, which should be read in conjunction with this policy.
- 2.5.9. Garages – Alliance has approximately 1,700 garages in ownership. Many of these garages may contain asbestos containing materials. As such Alliance will carry out a programme of sample inspections (10%) to assess the location and condition of the asbestos containing materials within these garages and implement a remedial programme of works thereafter as necessary. This sample may need to increase dependant on the results of the initial 10%.

2.6. Remedial work

- 2.6.1. Alliance will ensure there is a robust process in place for the management of any follow-up works required following the completion of an asbestos management survey.
- 2.6.2. Alliance will ensure that following asbestos surveys, any asbestos containing materials that are found to be in a poor condition or that are likely to be regularly/easily damaged or disturbed through the normal use of a dwelling will be repaired, protected, or removed at the earliest opportunity.
- 2.6.3. Where there is any doubt as to the composition of the material uncovered, a sample will be taken and analysed in order to facilitate the instruction of remedial works where required.
- 2.6.4. Where asbestos is positively identified and as a result of a risk assessment (conducted in accordance with published guidance) removal, sealing or encapsulation is recommended, this will be carried out for.
- Non-licensed works – as defined in regulation 2 of the CAR 2012 – by specifically trained contractors (including operatives working for the in-house team) with appropriate equipment and working procedures in place which are sufficient to comply with the CAR 2012.
 - Notifiable non-licensed works – as defined in regulation 2 of the CAR 2012 – as in 8.4.1 above, or by a licensed asbestos removal contractor (LARC) licensed by the Health & Safety Executive in compliance with the CAR 2012.
 - Licensed works - as defined in regulation 2 of the CAR 2012 – by a licensed asbestos removal contractor (LARC), licensed by the Health & Safety Executive in compliance with the CAR 2012.

- Alliance will ensure there is a robust process in place to investigate and manage all RIDDOR notices issued with regards to asbestos.
- Where an asbestos containing material has been removed in whole or in part, it will be replaced with a material that has no asbestos content and fulfils the equivalent function of the original asbestos material, e.g. for fire protection.

2.7. Record keeping

- 2.7.1. Alliance will establish and maintain a programme of domestic, non-domestic (communal blocks) and 'other' property surveys and re-inspections and an Asbestos Register of all the asbestos containing materials by type, address, location and condition.
- 2.7.2. Asbestos management survey dates and asbestos re-inspection survey dates, details of ACMs and asbestos management survey reports are to be held in an appropriate asset management system.
- 2.7.3. An appropriate asset management system will be used to record the details of all asbestos surveys undertaken on Alliance's non-domestic (communal), domestic and other properties. This will include the date of the most recent survey and/or re-inspection where applicable.
- 2.7.4. The findings from the asbestos survey, including any ACMs and remediation works identified and subsequently completed should also be recorded on an appropriate asset management system.
- 2.7.5. Alliance will hold and maintain accurate survey/re-inspection reports records against every non-domestic (communal), domestic and 'other' property where applicable and all survey reports and other certification will be stored on an appropriate asset management system.
- 2.7.6. Appropriate asbestos information will be made available to all interested stakeholders as required.
- 2.7.7. Alliance will check and hold records of relevant qualifications held by all employees who carry out asbestos related work (e.g. P402, P405, etc.).

2.8. Key roles and responsibilities

- 2.8.1. The Alliance Board will have overall governance responsibility for ensuring the Asbestos Policy is fully implemented to ensure full compliance with the regulatory standards, legislation and approved codes of practice. As such the Board will formally approve this policy and review it every 3 (three) years (or sooner if there is a change in regulation, legislation or approved codes of practice

- 2.8.2. The Board will receive quarterly updates on the implementation of the Asbestos Policy and performance along with notification of any non-compliance issue which is identified. This is so they have assurance that the policy is operating effectively in practice.
- 2.8.3. The SLT will receive reports (from relevant forums) in respect of asbestos management performance and ensure compliance is being achieved. They will also be notified of any non-compliance issue identified.
- 2.8.4. The Chief Operating Officer has strategic responsibility for the management of asbestos and ensuring compliance is achieved and maintained. The Head of Customer Safety will oversee the implementation of the asbestos survey programme and this policy
- 2.8.5. The Head of Customer Safety will be responsible for overseeing the delivery of the agreed asbestos survey programme and are also responsible for the prioritisation and implementation of any works arising from the asbestos surveys.

2.9. Competent Persons

- 2.9.1. Alliance will ensure that the manager with lead responsibility for operational delivery is P405 qualified. If they do not have P405, they should obtain this within 12 months of the approval of this policy or appointment to the role.
- 2.9.2. Training will ensure that competent (UKAS accredited) contractors are procured and appointed to deliver initial asbestos management surveys and refurbishment and demolition surveys.
- 2.9.3. Alliance will ensure any in-house surveyors used to carry out re-inspection surveys are P402 qualified, and that their work is audited on a sample basis (5%) by an external UKAS accredited asbestos consultancy.
- 2.9.4. Alliance will ensure that competent licensed asbestos removal contractors (LARC) are appointed for all licensed works.
- 2.9.5. The Home Repairs Service Team with responsibility for delivery will check the relevant qualifications of employees working for these contractors on an annual basis and evidenced appropriately.

2.10. Training

- 2.10.1. This policy and the Asbestos Management Plan that supports it will be subject to a range of training across Alliance and will involve all relevant stakeholders. The training will be bespoke to the individual stakeholders and refresher training will be provided as appropriate.

- 2.10.2. Training will include team briefings for those employees who need to have a basic understanding and awareness of asbestos but who may not be actively involved in the delivery of the asbestos policy, plan and programmes of surveys and works. This will be basic asbestos awareness training and will include delivery at relevant team meetings.
- 2.10.3. On the job training will be provided to those employees who will be responsible for managing the programme of surveys and remediation works as part of their daily job.
- 2.10.4. Regular toolbox talks should be given by Alliance to their operatives or their contractor partners to their operatives in the form of appropriate asbestos awareness training and provide evidence of the same.

2.11. Performance reporting

- 2.11.1. Robust key performance indicator (KPI) measures will be established and maintained to ensure Alliance is able to report on performance in relation to asbestos.
- 2.11.2. KPI measures will be produced and provided to the relevant oversight Group on a monthly basis and Board level on a quarterly basis. As a minimum, these KPI measures will include reporting on:

Data – the total number of:

- Properties – split by domestic properties, communal blocks and 'other' properties.
- Properties on the asbestos management / re-inspection programme.
- Properties not on the asbestos management / re-inspection programme.
- Properties with a valid 'in date' survey / re-inspection. This is the level of compliance expressed as a number and a %.
- Properties where the survey / re-inspection has expired and is 'out of date'. This is the level of non-compliance, expressed as a number and a %.
- The percentage of domestic stock with full asbestos data.

Narrative - an explanation of the:

- Current position
- Corrective action required
- Anticipated impact of corrective action
- Progress with completion of remedial works.

- 2.11.3. Alliance will require external contractors to provide the results of their own 5% quality assurance audit checks, as required by UKAS, on a monthly basis. In addition, they should provide the results of the 5% audit samples of the work of the in-house P402 qualified surveyors.
- 2.11.4. Alliance will carry out an independent audit of asbestos at least once every two years. This audit will specifically test for compliance with the regulation, legislation and codes of practice and identify any non-compliance issues for correction.
- 2.11.5. Alliance will collect and provide information to support effective scrutiny by tenants of asbestos management performance
- 2.11.6. Alliance Homes will:
- Collect and process information specified by the regulator relating to their performance against the tenant satisfaction measures. The information must be collected within a timeframe set by the regulator and must meet the regulator's requirements in Tenant Satisfaction Measures: Technical Requirements and Tenant Satisfaction Measures: Tenant Survey requirements.
 - Annually publish their performance against the tenant satisfaction measures. This should include information about how they have met the regulator's requirements set out in Tenant Satisfaction Measures: Technical requirements and Tenant Satisfaction Measures: Tenant survey requirements. This information must be published in a manner that is timely, clear, and easily accessed by tenants.
 - Annually submit to the regulator information specified by the regulator relating to their performance against those measures. The information must be submitted within a timeframe and in a form determined by the regulator.

2.12. Non-Compliance / Escalation Process

- 2.12.1. Any non-compliance issue identified at an operational level will be formally reported to the Head of Customer Safety in the first instance.
- 2.12.2. The Head of Customer Safety will agree an appropriate course of corrective action with the Chief Operating Officer in order to address the non-compliance issue and the Chief Operating Officer will report details of the same to SLT.
- 2.12.3. The Director of Business Services utilising relevant forums will provide 'independent' oversight of the programme delivered by Home Repairs Service.
- 2.12.4. SLT will ensure the Board is made aware of any non-compliance issue so they can consider the implications and take action as appropriate.

- 2.12.5. In cases of a serious non-compliance issue SLT and Board will consider whether it is necessary to disclose the issue to the Regulator of Social Housing in the spirit of co-regulation as part of the Regulatory Framework.

3. Equality and diversity

- 3.1. This policy is subject to a periodic Equality Impact Assessment (EIA).
- 3.2. The purpose of such an assessment is to consider the effect of the policy regarding the recognised protected characteristics of equality and ensure that it does not unfairly impact any individual or group. The protected characteristics are age, disability, gender reassignment, race, religion or belief, sex, sexual orientation, marriage and civil partnership, pregnancy and maternity or other grounds set out in our Equality and Diversity Strategy and Policy. Remedial action will be undertaken if a detrimental effect is identified.
- 3.3. The EIA also requires the policy author to consider whether the policy is likely to negatively impact on a person's Human Rights.
- 3.4. This policy and any other related Alliance Homes publications can be provided in other formats for those with visual, literacy or language difficulties.

4. Complaints

- 4.1. If you would like to raise a complaint in relation to this policy, you can do this by calling us on **03000 120 120** or emailing us at act@alliancehomes.org.uk.
- 4.2. All complaints will be handled in line with the latest Alliance Homes Complaint Handling Policy.

5. Associated documents

- 5.1. For further information see in particular:
- No Access Procedure
 - Court Injunction Procedure
 - Onboarding New Properties Procedure (under development).

6. Version control and approval dates

Approval stage	Date completed
Equality Impact Assessment completed	12/12/23
EIA reviewed by specialist colleague within HR	18/12/2023
SLT review / approval	15/01/2024
Board or Committee approval	28/02/2024
Minor amend made to insert standard complaints section, non-access paragraph and format for external publication	June 2025
Next review date	28/02/2026

7. Appendices

Appendix 1 – Equality Impact Assessment

Appendix 1

Equality Impact Assessment

An Equalities Impact Assessment must be conducted alongside the review of an existing policy or the creation of a new one.

1. Name the Strategy, Policy, Procedure or Function (SPPF) being assessed and name of author.

Asbestos Policy – T Kent Business Compliance Manager

2. Aims of the SPPF being assessed.

- *Whose need is it designed to meet?*
- *Are there any measurable elements such as time limits or age limits?*

The aim of this policy is to safeguard customers and colleagues and to ensure compliance with legislation, regulation and guidance.

3. Who has been consulted in developing the SPPF?

- *Make reference or links to consultation/evidence documents*

Members of the Landlord Safety Compliance Group

4. Does the SPPF promote equality of opportunity?

The policy has neither a positive or negative impact on the protected characteristics as shown below, but rather ensures that all asbestos is dealt with in a manner compliant with the relevant legislation, regulation and guidance.

5. Identify potential impact on each of the diversity “groups” by considering the following questions (the list is not exhaustive but an indication of the sort of questions assessors should think about):

- *Might some groups find it harder to access the service?*
- *Do some groups have particular needs that are not well met by the current SPPF?*

- *What evidence do you have for your judgement (e.g. monitoring data, information from consultation/research/feedback)?*
- *Have staff/residents raised concerns/complaints?*
- *Is there local or national research to suggest there could be a problem?*

Protected Characteristic	No impact	Negative	Positive impact	Information source/s **	Comments/evidence
Race	X				
Disability	X				
Gender	X				
Transgender	X				
Sexual orientation	X				
Religion or belief	X				
Age	X				
Marriage & Civil Partnership	X				
Pregnancy and Maternity	X				
Rural issue	X				

Social mobility	X				
-----------------	---	--	--	--	--

Was there a negative impact identified in question 5? If yes go to question 6. if not go to question 7.

6. If “negative impact” identified in table (4) above is it?

Legal -

YES	NO
HIGH	LOW

What is the level of impact? -

If it is not legal and/or high impact – (i.e.: if you have highlighted **NO** to legal and **HIGH** to impact, then the document should be referred to Head of HR)

7. If positive impact has been identified in table 4 above, how can it be improved upon or maximised, either in this SPPF or others?

The policy aims to ensure a consistent and fair approach is taken in all cases regardless of protected characteristic.

8. Full EIA (or if you decide full EIA is not necessary but some changes should be considered)

- *Are there changes you could introduce which would make this SPPF work better for this group of people?*
- *Is further research or consultation required?*

8. Does this proposal have any potential Human Rights implications?

If yes, please describe (if necessary, please refer to the Alliance Homes Group Human Rights Policy)

No.