

Cheltenham Borough Council

Cabinet Housing Committee – 1 April 2026

Draft Aids and Adaptations Policy

Accountable member:

Cllr Flo Clucas, Cabinet Member for Housing and Customer Services

Accountable officer:

Claire Hughes, Director of Governance, Housing and Communities

Helen McEgan, Operations Manager – Technical & Investment

Executive summary:

The draft Aids and Adaptations Policy is in line with legislative requirements and provides clarity and guidance to both applicants and the council when assessing requests for disabled adaptations from council housing tenants and from prospective council housing tenants. The policy will enable the council to provide a fair and consistent approach to these requests and will ensure the most effective use of the council's housing stock and limited capital budget.

If approved by the Cabinet Housing Committee, the draft will be issued for consultation with key stakeholders. An updated version will then be presented to the committee in June for final approval

Recommendations:

1. To approve the Aids and Adaptations Policy as a draft for consultation.
-

1 Background

1.1. The draft aids and adaptations policy seeks to inform tenants of how to request aids and adaptations in council owned housing, as well as the process that the council will follow when adapting council-owned homes to meet specific tenant needs. This policy will not apply to residents living in private rented, owner occupied or housing association properties.

1.2. Where possible, the council will use this policy to enable tenants to remain both safe and independent in their own home to support positive health and wellbeing outcomes. However, in certain circumstances, alternative housing options will be explored to try and meet tenant's needs. The policy gives examples of when a property may not be deemed suitable for adaptation.

1.3. The Committee is asked to approve the draft policy for consultation with key stakeholders including tenants. The final draft, including any amendments, will be presented to the committee for approval at the next meeting.

2 Main content

2.1 The council funds and administers disabled adaptations for its own housing stock

2.2 It is a mandatory duty for the council to provide housing assistance for vulnerable disabled people and council housing adaptations are funded through the capital and planned maintenance programme from the Housing Revenue Account (HRA). There is £0.600m in the budget for 2026/27.

2.3 In order to make best use of limited resources and to set out the aims and objectives that will be pursued and the principles, values and constraints that will be applied in relation to the provision of aids and adaptations to council owned housing, a policy has been produced.

2.4 The draft aids and adaptations policy is attached at Appendix 2 of this report. This sets out the assistance available, the process for applying, eligibility criteria, qualifying conditions and details of the financial testing.

2.5 If approved, the draft will be widely consulted on with key internal and external stakeholders, including tenants, the county council and NHS. Leaseholders are already able to access a similar service and details of this can be found in the approved [Housing Assistance Policy](#) which relates to private sector housing.

3 Key risks

3.1 The risk of not having a policy in place is high as it can lead to inconsistently applied decision making. This in turn could lead to increased complaints and ombudsman cases and wasted resources in terms of both budgets and property being mismanaged.

Report author:

Helen McEgan, Operations Manager, Technical & Investment

Helen.McEgan@cheltenham.gov.uk

Appendices:

- i. Risk Assessment
- ii. Draft Aids and Adaptations Policy

Appendix 1: Risk Assessment

Risk ref	Risk description	Risk owner	Impact score (1-5)	Likelihood score (1-5)	Initial raw risk score (1 - 25)	Risk response	Controls / Mitigating actions	Control / Action owner	Deadline for controls/ actions
1.0	No policy in place leading to inconsistent decision making, increased customer dissatisfaction and wasted resources (property and budget)	Operations Manager T&I	5	1	5	Avoid the risk	Produce a policy and keep it under review	Operations Manager T&I	30 th June 2026

Cheltenham Borough Council Aids and Adaptations Policy for Council Housing Version Control

Document Name: Aids and Adaptations Policy

Version: 1.0

Responsible Officer: Operations Manager, Technical and Investment, Housing Services

Approved by: Draft for Consultation

Next review date: TBC

Retention Period: 5 Years

Revision History:

V1.0 Draft for consultation

Consultees

Internal

- Public and Environmental Health Manager
- Head of Regulatory Compliance
- Empty Homes Team Leader
- Head of Tenancy Sustainment
- Housing Options Manager.
- Housing Partnership Manager
- Interim Head of Finance
- Head of One Legal

External:

- OT service (Gloucestershire Health and Care Trust)
- Adult Social Care (Gloucestershire County Council)
- Children's Social Care (Gloucestershire County Council)

Distribution

Email

Contents

<u>Revision History:</u>	4
<u>Consultees</u>	4
<u>Distribution</u>	4
<u>Introduction and Purpose of the Policy:</u>	6
<u>Policy Statement</u>	7
<u>Aids and Adaptations- Legal Framework:</u>	8
<u>National Context:</u>	8
<u>Local Context:</u>	9
<u>Equality and Diversity:</u>	10
<u>Assistance Available</u>	11
<u>Application Process</u>	14
<u>Eligibility</u>	16
<u>Qualifying Conditions</u>	16
<u>Financial Assessment</u>	17
<u>Completion of Works</u>	17
<u>Communication and Expectations:</u>	18
<u>Complaints and Appeals:</u>	18
<u>Monitoring and Review:</u>	19

Introduction and Purpose of the Policy:

Cheltenham Borough Council (“The council”) is committed to creating strong, resilient communities that make residents feel safe as well as providing safe, high-quality and secure homes that enable all our tenants to thrive.

The council’s aids and adaptations policy for council housing, seeks to inform tenants of how to request aids and adaptations, as well as the process that the council will follow, working with tenants, when adapting council-owned homes to meet specific tenant needs. This policy will not apply to residents living in private rented, owner occupied or housing association properties.

By offering a clear, easy-to understand pathway for our tenants, we can support tenant wellbeing and independence, as well as creating efficient processes with key partners, both internally and externally to ensure that aids and adaptations are installed in a timely fashion.

A flow chart is attached in Appendix 1 of this policy to aid tenants in understanding how to access and navigate the aids and adaptations service.

Where possible, the council will use this policy to enable tenants to remain both safe and independent in their own home to support positive health and wellbeing outcomes, however, in certain circumstances, and where the council has considered appropriate adaptation options, alternative accommodation options, working with tenants, will be explored to try and meet tenant’s needs.

Policy Statement

This policy aligns with the mission statement for Housing Services, as set out within the council's [Corporate Plan 2025-28](#), namely:

“Together with our tenants we provide safe, secure and well-maintained homes that help everyone to reach their potential”.

The provision of appropriately adapted council homes, as supported by this aids and adaptations policy aligns with this mission statement, and reflects the council's duty of care towards our tenants. This policy is an important part of meeting the council's wider obligations under the [five consumer standards introduced by the Regulator of Social Housing](#).

In particular, the latest [Safety and Quality Standard](#) requires the council, in our landlord capacity, to:

- “Assist tenants seeking housing adaptations to access appropriate services” (1.5.1)
- “Ensure that the safety of tenants is considered in the design and delivery of landlord services and take reasonable steps to mitigate any identified risks to tenants” (2.2.3)
- “Clearly communicate to tenants and relevant organizations how they will assist tenants seeking housing adaptations services” (2.4.1)
- “Co-operate with tenants, appropriate local authority departments and other relevant organisations so that a housing adaptations service is available to tenants where appropriate”. (2.4.2)

The council's approach seeks to provide safe, secure and high-quality homes for our tenants. This policy will aid the council in meeting the housing needs of disabled and frail tenants living in council housing stock, ensuring that they can have a good quality of life in safe and high-quality homes tailored to meet their needs.

Aids and Adaptations- Legal Framework:

Cheltenham Borough Council has a statutory duty to provide adaptations for disabled tenants. This policy seeks to define how the council will deliver and deploy the limited resources available to enable tenants to benefit from essential aids and adaptations. In doing so, the council will seek to offer a tenure neutral service that offers an equivalent quality and speed of service as would be available to residents living in private rented, owner occupied or housing association properties.

The following pieces of legislation will be taken into account when delivering this policy:

- The Chronically Sick and Disabled Persons Act 1970
- The Children's Act Part 3 1989
- The Housing Grants, Construction and Regeneration Act 1996.
- The Housing Act 1996 (amended)
- The Local Government Act 1999
- The Regulatory Reform (Housing Assistance) (England and Wales) Order 2002
- Armed Forces Act 2006 (under Section 343, amended by Section 8 of the Armed Forces Act 2021)
- The Equality Act 2010
- The Care Act 2014
- The Children and Social Work Act 2017 (Section 1).

National Context:

Living in an accessible home can have a life-changing impact for people with frailty and disabilities. A significant body of research reflects that a suitable, accessible and adapted home can help disabled people to maintain their independence and social connections within their local communities. The focus on prevention, rather than reacting to health and social care issues are broadly reflected within The Department of Health and Social Care (DHSC)'s latest [10 year health plan for England: Fit for the Future](#), which focuses on shifting the focus from hospital to community, which aligns with the council's focus, working with key partners, in helping our tenants to live independently in their communities for longer to help take strain from primary and secondary care, as well as minimising unnecessary hospital appointments or moving the need to move into care settings prematurely.

National evidence from the [2024/25 English Housing Survey](#) indicates that 61% of people living in the social housing sector (in rented affordable housing) have a long-term illness or disability, which is likely to align with higher levels of physical disabilities, meaning that residents living in social housing may require proportionately higher levels of adaptations than residents living in other forms of housing. In view of these high nationwide levels of frailty and disability, the Government recognises that disabled

people from all walks of life have the right to live safely and independently in their own homes.

Local Context:

Cheltenham Borough is Gloucestershire's third largest local authority by population, with Office for National Statistics figures (ONS) showing a population of 121,739 as of 2024 according to the Housing and Economic Needs Assessment (HENA). Cheltenham is surrounded by greenbelt land and the Cotswold National Landscape. This means that the Borough covers a small geographical area of 18 square miles. Most of Cheltenham's population live in urban communities, with several distinctive areas with different population profiles and characteristics being present across the town.

Draft HENA data indicates that 19.8% of Cheltenham's population are over 65, which, despite being higher than the national average of 18.7%, is lower than the Gloucestershire and South West average of 22% and 22.8% respectively.

When compared to the other Gloucestershire local authorities, Cheltenham's demographic profile has a higher number of 16–64-year-olds (as of 2024), but this population is projected to become increasingly weighted towards the 65+ demographic. Whilst specific figures by local authority have not been provided within the draft HENA, between 2024-2046 the proportion of Gloucestershire's over 65 population is projected to increase by 41.2% (with 61,000 people moving into the 65+ age bracket), likely resulting in increased long-term demand for health, housing and social care services, including aids and adaptation services.

The council owns just over 4,650 rented affordable homes, of which 885 homes (20%) include some form of aid or adaptation and 114 are classed as wheelchair accessible. Furthermore, the council's stock includes 535 properties with step free access, 830 properties with a bedroom at the entrance level and 1,079 properties with the bathroom at the entrance level (this includes 124 bungalows). This information has been collected from the stock condition survey and will help the council to categorise its stock in accordance with the Gloucestershire-wide Accessible Housing Register.

Reviewing the council's housing waiting list, the following figures reflect the level of unmet need as of January 2026 for accessible and adaptable rented affordable housing.

- As of January 2026, 343 households were recorded as having a physical disability
- As of January 2026, 359 households required ground floor accommodation or accommodation with lift access.
- As of January 2026, 153 households required a level access shower.

Average turnover of council stock is 9% a year but for fully wheelchair accessible homes the figure is much lower. As well as building affordable housing on council owned land wherever possible, the council will continue to negotiate with developers to purchase more adaptable and wheelchair accessible homes on new developments. These will be available to applicants through [Homeseeker Plus](#)- the council's housing register.

As of January 2026, 187 adaptable rented affordable homes had gained final planning consent, with likely completion dates over the next 3-4 years. Additionally, final planning consent had been granted for 8 wheelchair accessible social rented homes to meet the needs wheelchair users on the council's housing register.

Moving forwards, the council, working alongside our partners at Gloucester City Council and Tewkesbury Borough Council, are actively working on the Strategic and Local Plan (SLP), which, will seek to establish a percentage requirement of adaptable and wheelchair accessible affordable homes on all new developments to ensure that new homes built through the SLP reflect the importance of supporting our tenants to remain safe and independent in their own homes, both now, and into the future.

Equality and Diversity:

As a public body, the council is committed to meeting our obligations around providing equality of opportunity and preventing discrimination (both direct and indirect) in line with the 2010 Equality Act. This act also requires the council to meet the 'Public Sector Equality Duty', when making decisions and delivering services. In this context, any adaptation applications from tenants (processed by the council either as minor, major, or DFGs) will be handled in a fair manner that recognises the council's statutory responsibilities, as well as offering reasonable adjustments to tenants in line with the council's reasonable adjustments statement within the latest Equality and Diversity Policy, which reflects that the council will shape service provision to reflect the needs of tenants with protected characteristics.

This Aids and Adaptations policy has been written to reflect the 2010 Equality Act and other relevant legislation and ensures that all protected characteristics (as set out within the 2010 Equality Act) are covered by this policy.

An Equality Impact Assessment (EIA) has been completed by the council in support of the Aids and Adaptations policy, which can be found in Appendix 2

Assistance Available

The council provides a range of both minor and major adaptations to tenants living in council-owned homes. The aids and adaptations available to tenants includes the following:

Available adaptation service	Examples of work	Who makes request	Timescales	Means-tested?	Responsible teams
Minor adaptations. Work costing up to around £2,000 a. Minor adaptations	Grab rails, handrails, lever taps, half-steps	Tenant can request work	6 weeks	Not means tested	Repairs/Logistics Team
b. Minor adaptations	Over-bath shower, ramps, door widening, level threshold doors, minor kitchen adaptations	Requires OT referral	26 weeks	Not means tested	Technical Services Team
c. Requests for reasonable adjustment	Work will vary based on tenant's needs	Requires OT referral	26 weeks	Not means tested	Technical Services Team
Major adaptations. Adaptations costing between £2,000 - £30,000.	Level access shower, stairlift, through-floor lift, wash-dry toilet, adaptations to make property wheelchair accessible, ground floor extension	Requires OT referral	26 weeks but longer if complex adaptations or work to construct an extension	Yes – subject to means-testing	DFG Team and/or Technical Services Team
Work to communal areas	Ramps, door opening systems	Requires OT referral	26 weeks	Not means tested	Technical Services Team

Minor Adaptations are relatively small, low-cost modifications (typically under £2,000), designed to improve safety, accessibility, and independence for people with disabilities or mobility issues.

Tenants do not always need to be assessed by an Occupational Therapist (OT). The examples below are intended to explain this further

a) Examples when an assessment is **not** required and tenants can self-refer to the Repairs Team for work to be carried out:

- grab rails
- handrails
- lever taps
- half-steps

b) Examples when an OT assessment **is** required:

- over-bath shower
- ramps
- door widening
- level threshold doors
- minor kitchen adaptations

Major adaptations are works that usually require structural changes to the home and cost between £2,000 and £30,000.

Tenants will require an assessment by an Occupational Therapist to determine if their disability is affecting their ability to carry out at least one of the following essential daily activities:

- Facilitating access to/from the property and garden/area of open space.
- Access to a principal family room or bedroom.
- Access to a bath or shower.
- Access to a toilet and wash-hand basin.
- Facilitating the preparation and cooking of food.
- Better heating.
- Control of power, light and heat.

The most common type of major adaptations is replacing a bath with a level access shower, installing a stairlift, widening doorways and other work to make a property suitable for a wheelchair user, installation of a door opening system or wash-dry toilet. Major adaptations can also include the installation of a through-floor lift and construction of a ground floor extension.

Discretionary Assistance

In addition, there may also be some discretionary funding available in association with the adaptation services listed. All discretionary assistance is subject to availability of funding and will be considered on a case-by-case basis.

Specific examples of discretionary funding will mirror examples set out in the council's Housing Assistance Policy and includes:

1. Shortfall funding where adaptations exceed £30,000.
2. Funding towards a disabled person's assessed contribution.
3. Funding for rapidly progressing and/or highly debilitating conditions.
4. Relocation grant/Downsizing grant.
5. Funding for temporary rehousing to facilitate adaptations.

Other examples of discretionary funding will relate to specific types of adaptation and includes:

6. Hardstandings and dropped kerbs

DRAFT

Application Process

Minor Adaptations (a) not requiring an assessment by the Occupational Therapist (see above) can be arranged by the tenant contacting the council's housing services by calling 0800 4080000 or sending an email to housing@cheltenham.gov.uk

Minor Adaptations (b) requiring an assessment by the Occupational Therapist (see above) can be arranged by the tenant contacting Gloucestershire County Council on either the Adult Social Care Help Desk on 01452 426868 or the Children's Help Desk on 01452 426565. The assessment will identify if any adaptations are required to meet the needs of the disabled person and a referral will be sent to the council's Adaptations Co-Ordinator who will determine if the nature of the adaptations is minor or major.

If the works are below approximately £2,000, the referral will be sent through to the Technical Services team to be processed.

The Technical Services team will either raise an order for the work or add it to a planned improvement programme due to be carried out within 12 months (e.g. bathroom or kitchen renewal). The tenant will be kept updated throughout the process.

Major Adaptations requiring an assessment by the Occupational Therapist (see above) can be arranged by the tenant contacting Gloucestershire County Council on either the Adult Social Care Help Desk on 01452 426868 or the Children's Help Desk on 01452 426565. The assessment will identify if any adaptations are required to meet the needs of the disabled person and a referral will be sent to the council to request funding for the work. Major adaptations will be carried out through a Disabled Facilities Grant unless the work can be incorporated as part of a kitchen or bathroom refurbishment that is programmed to be carried out within 12 months of receiving a referral from the Occupational Therapist.

Any grant assistance is subject to a means-test calculation unless the adaptations are for a disabled child. How much grant assistance is available will depend on the level of income and savings of the disabled person and their partner, if applicable (See section on Financial Assessment).

A Grant Officer will arrange to visit the property due to be adapted to consider:

- If the adaptations are suitable for the property having regard to its future use. For example, adaptations to a bungalow or ground floor flat/maisonette will be considered suitable. Adaptations to a 2nd floor flat which is accessed by stairs (and no lift is available) may not be considered suitable.
- The number of occupants in the property compared to the number of bedrooms to see if a property is under or over occupied.
- Whether moving to alternative accommodation would better suit the needs of the disabled person.
- Whether the tenant intends to remain in the property on completion of the adaptations for a period of 5 years or more.

The outcome of these points will form the basis for Cheltenham Borough Council's decision as the landlord to agree that the proposed adaptations can go ahead.

The council may refuse to carry out adaptations where any of the following apply:

- It is not reasonable or practicable to adapt a property. In such circumstances the council would continue to seek a positive outcome by looking at other housing options.
- A Right to Buy application has been received. If the Right to Buy application is withdrawn or cancelled, a new application for major adaptations may be submitted.
- The tenant has expressed an intention to move from the property by transfer, mutual exchange, or another method.
- There is an order of the court relating to the tenancy such as rent arrears or antisocial behaviour or if there is ongoing court action.
- The work would extend beyond the curtilage of the property or may adversely affect communal areas.
- The property is under occupied or over occupied, the council would work with the tenant for an alternative solution.

If the property can be adapted the work will be allocated to either an in-house surveyor or the tenant will be required to appoint an external surveyor to help them with their grant application. The surveyor will prepare plans and a detailed specification of the work, obtain estimates and supervise the work until completion. The council will notify the applicant of the outcome of their grant application in writing as soon as reasonably practicable, and, in any event, not later than six months after the date of the application concerned. Eligible works will be carried out within twelve months from the date of approval of the application concerned.

Tenants should be aware there may be implications relating to rent where major adaptations are carried out. For example, adaptations which include the installation of specialist equipment such as a stairlift, through-floor lift, wash-dry toilet will require an annual service, and the rent may be increased to cover the service costs. Similarly, adaptations that result in additional ground floor facilities or an extra bedroom may result in increased rent

Eligibility

The council will only normally consider an application for an adaptation in the following circumstances:

- If the adaptations are required by the tenant of a Cheltenham Borough Council property, or a member of their household.
- If the applicant is over 18 years old on the date of making the application.
- If adaptations are for children of parents with shared access arrangements, adaptations will only be completed at the principal home, evidenced by the receipt of Child Benefit.
- To be eligible for a minor (b) or major adaptation a person is disabled if:
 - Their sight, hearing or speech is substantially impaired,
 - They have a mental disorder or impairment of any kind, or
 - They have a substantial physical disability by illness, injury or impairment.
 - This automatically includes any adult who is or could be registered under section 77 of the Care Act 2014. For children and young people, it includes those who are registered under paragraph 2 of Schedule 2 to the Children Act 1989 or a disabled child as defined by Part III of the Children Act 1989.

Qualifying Conditions

The following conditions will need to be met prior to the commencement of any adaptation:

- Consent from the council's Grant Officer.
- If a contribution from the tenant towards the proposed works is required, this must be paid prior to any work commencing.
- If a tenant wishes to enhance the planned works approved by the council, such as different tiles or taps to that specified, agreement will have to be made directly between the contractor and the tenant. All costs associated with the additional work will be paid by the tenant to the contractor, prior to the commencement of the work.
- Where works will result in additional ground floor facilities / bedrooms the tenant must sign to confirm they approve for works to proceed and that they accept the wider implications of the work being carried out prior to commencement.

If a Right to Buy application is made after the completion of any adaptations, then the cost floor rule may be applied. The cost floor rule may reduce the amount of discount received, where a considerable amount of money has been spent on repairing or maintaining a property over (a maximum of) the previous 15 years. The discount received must not reduce the price paid below what has been spent on building,

buying, repairing or maintaining the property and if the value is greater, then no discount would be received.

Financial Assessment

Major adaptations are subject to a formal means test to determine the tenants' contribution towards the cost of the work.

If a disabled person is calculated to have an assessed contribution less than £10,000, they may be able to receive discretionary funding to cover their contribution.

If the tenant is required to contribute towards the cost of the work, they will be notified of the amount and agreement obtained to pay this and all payments received prior to any work starting.

Where the tenant is in receipt of a recognised, qualifying means tested benefit known as a passported benefit, they will not be further means tested and they will not have a calculated contribution to make.

Completion of Works

On completion of major adaptations, the work will be subject to a 12-month warranty, so any problems within that period will be the responsibility of the contractor who carried out the work. Once the 12-month warranty has expired, the council will be responsible for all ongoing maintenance and repairs of adaptations.

Where the adaptations include the installation of specialist equipment such as a stairlift or wash-dry toilet, the council will take on the responsibility of the annual servicing and any repairs of the equipment. The exception to this will be where repairs are required due to misuse of the specialist equipment by the tenant. Tenants may be re-charged the cost of any repairs in these circumstances.

When a property that has been adapted becomes vacant, the council will not remove the adaptations but will re-let the property as existing and try to match it with the needs of applicants on the housing register.

Communication and Expectations:

The council, when carrying out the aids and adaptations service, commits to meeting the following standards in terms of communications and service standards:

- We commit to discussing the options around aids and adaptations with you in easy-to-understand language, ensuring that you can make an informed decision about whether you would prefer to remain at home with adaptations or move to a more suitable property.
- We will keep you informed and updated about the status of your minor or major adaptations application at every stage of the process through your preferred communication method.
- We will work closely with Occupational Therapists and Contractors, Consultants and Surveyors to ensure that your needs are met in a timely manner, whilst managing expectations owing to significant demand for these services.
- We will work closely with the council's Housing Options and Lettings services to enable you to move home, if adaptations are either unfeasible or do not represent good value for public money.

Complaints and Appeals:

If a tenant is unhappy with any element of services that they have received from the council, they will be able to make a formal complaint. The complaint will be dealt with in line with [the latest Complaints Policy](#). Tenants can make complaints to the council via phone, in writing, in person or via email as set out within our Complaints Policy.

Applicants are entitled to request a review of any adverse decision taken on their application. Reviews will only be accepted if the applicant has replied to a notification letter within 28 days clearly stating the request for an appeal, setting out any additional factors that have not been considered during the initial decision. These additional factors will be considered by the appeal panel.

The council will hold an appeal panel meeting on a bi-monthly basis to discuss live cases.

A letter will be sent to the applicant clearly stating the outcome of the review within 10 working days of the appeal meeting.

Monitoring and Review:

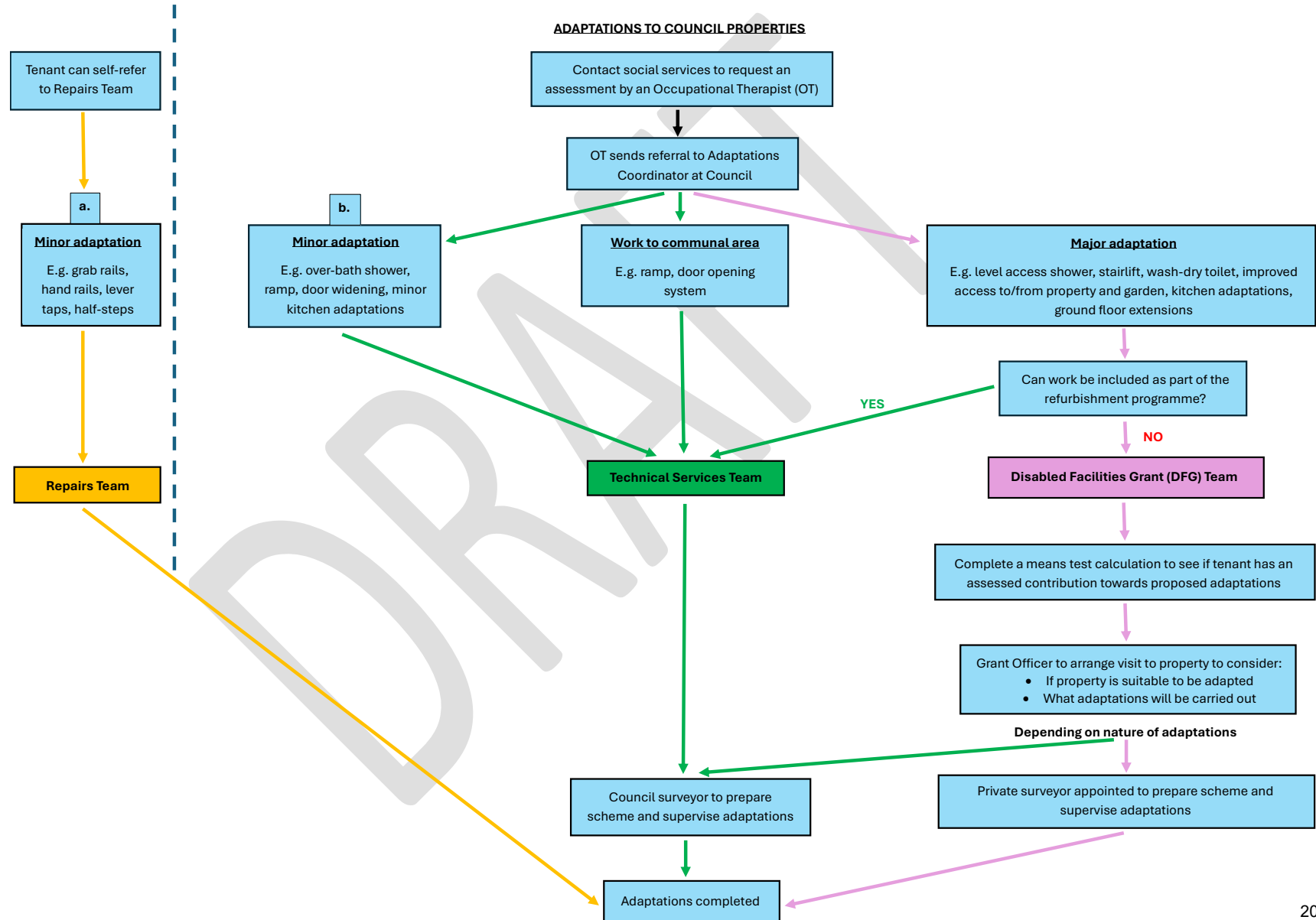
The Operations Manager of Technical Investment within the council's Housing Services portfolio is responsible for monitoring this policy to ensure that it is being correctly applied and is responsible for carrying out reviews of this policy, where these are required.

The council commits to undertaking regular (yearly) reviews of this policy to ensure that it remains up to date. This will include ensuring that relevant staff training needs are met, as well as focusing on achieving the continuous improvement of the council's aids and adaptation service. Key performance indicators will be reported to the Compliance Monitoring Group which meets bi-monthly.

This policy will be automatically reviewed whenever the Government changes policy or legislation around the delivery of aids and adaptations (including disabled facilities grants). In the absence of this trigger, the council commits to reviewing this policy every three years.

DRAFT

Appendix 1: Process Flowchart



Appendix 2: Equalities Impact Assessment

TO INSERT

DRAFT