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# Joint Venture with Sovereign Housing Association

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**Committee considering report:** Executive on 14 June 2018

**Portfolio Member:** Councillor Hilary Cole

**Date Portfolio Member agreed report:** 22 May 2018

**Report Author:** June Graves/Shiraz Sheikh

**Forward Plan Ref:** EX3392

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## 1. Purpose of the Report

- 1.1 To seek approval to establish a Joint Venture (JV) with Sovereign Housing Association as a Limited Liability Partnership (LLP) to deliver the Council's housing objectives through the provision of additional homes, in a range of tenures, to meet housing need in the District.
- 1.2 To provide sufficient information for Members to make a final decision on whether to proceed with the setup of the JV. As a complex and detailed area of work every effort has been made to summarise information for the purpose of decision making where possible.

## 2. Recommendations

2.1 The Executive resolves:

- (1) to approve the establishment of the JV with Sovereign in accordance with this report.
- (2) to delegate authority to the Chief Executive in consultation with the Deputy Leader and Executive Portfolio for Planning, Housing and Leisure, Head of Finance and Head of Legal Services to
  - (i) establish a JV with Sovereign Housing structured through a LLP to support the provision of additional homes in the District;
  - (ii) agree and authorise the execution of documentation required to implement the LLP model;
  - (iii) name the LLP; and
  - (iv) make appointments to the Management Board of the JV LLP of the Corporate Director of Economy and Environment, Head of Commissioning and Legal Services Manager (Governance & Environment).
- (3) to agree to allocate land adjacent to the Phoenix Centre, Newbury and land at Chestnut Walk, Hungerford, ("the Projects") to be developed for housing by the JV , subject to a separate decision by this Executive on the disposal to

JV together with valuation of the land and approval of the business plans for the Projects. Future projects in the JV Business Plan will also require approval by the Executive including any financial appraisals, business plans and the disposal of sites.

### 3. Implications

- |     |                         |  |
|-----|-------------------------|--|
| 3.1 | <b>Financial:</b>       | It is anticipated that the Council will contribute capital assets and funds to the JV in the form of land and/or funding of the proposed developments. It is likely that the funds for development will be financed through borrowing e.g. from the Public Works Loans Board. The value of the land contributed by the Council will be deemed to be either market value, or at a reduced value taking into account the additional non financial benefits to the residents of West Berkshire from the provision of social and/or supported housing. The JV will repay to the Council the value of capital contributed by the Council from revenue and/or capital receipts generated from the development. These repayments will cover any interest or other costs incurred by the Council. If the JV generates surplus income, it is intended this income will either be re-invested in the JV's activities or distributed 50:50 between the Council and Sovereign Housing. The proposed arrangement does not have any significant taxation implications for the Council and advice is being sought from the Council's tax advisors to ensure that there is no adverse effect on the Council's ability to reclaim from HMRC VAT which it has paid on its costs. |
| 3.2 | <b>Policy:</b>          | Policy work may be required to support the delivery of the JV business plan.   |
| 3.3 | <b>Personnel:</b>       | Officers will be required to act in support of the JV Management Board.  |
| 3.4 | <b>Legal:</b>           | As set out in the Report.  |
| 3.5 | <b>Risk Management:</b> | Specific risks are identified in the report and a risk register has captured all identified risks to date.   |
| 3.6 | <b>Property:</b>        | Disposal of land to the JV will be subject to Council processes and approvals.   |
| 3.7 | <b>Other:</b>           |  |

### 4. Other options considered

- 4.1 To continue working with affordable housing providers on a piecemeal basis.
- 4.2 Establish a wholly owned vehicle e.g. a Housing Company.
- 4.3 A procured JV.

**4.4 To do nothing.**

## Executive Summary

### 5. Introduction / Background

- 5.1 In order to make best use of land assets, resources, skills and expertise to progress house building in the District, it was agreed, by Members at Budget Board in September 2017, to pursue the option of setting up a Joint Venture (JV) between West Berkshire Council (WBC) and Sovereign Housing Association (SHA) to accelerate housing delivery.
- 5.2 The Council has an ambition for 1000 new affordable homes by 2020 but does not have the means to progress this, at pace, and therefore needs to find a structure and partner for doing so.
- 5.3 The environment for the delivery of affordable housing has become increasingly challenging and there has recently been a growing emphasis on partnership working. Both the Council and SHA have been looking at new ways of working in order to increase the annual delivery of new homes.
- 5.4 SHA has positive experience of working through a JV with private developers and is now looking to work with West Berkshire as a key local authority area to maximise housing delivery in line with its strategic objectives.
- 5.5 The Council has an existing portfolio of small/strategic sites, some of which have been unattractive to the market when offered for development. SHA have other sites which, when combined with WBC sites, could offer greater opportunity to provide housing of different tenures or to open up other development opportunities.
- 5.6 Recognising the JV as an opportunity, exploratory work has been undertaken to develop proposals for using these sites to deliver a mixed tenure portfolio of developments, under a JV, which, if taken forward, would meet a range of housing needs in the District.
- 5.7 Identification of the preferred structure has been key to allow proper exploration of the implications for both parties of entering into a JV relationship. To support these endeavours, contact has been made with both Brighton & Hove City Council and Peterborough City Council who have recently established similar arrangements.
- 5.8 Trowers and Hamlin were commissioned jointly by WBC and SHA in support of developing the recommended structure of the JV and to provide initial advice covering the powers and the JV model.
- 5.9 PSTAX has also provided initial financial and tax advice. The outcome of this wider consideration has been reflected in this report.
- 5.10 To maintain focus and pace the work has been overseen by a Member Reference Group that has met with officers on a monthly basis. Officer meetings have been held in the interim, to focus on the detail of the work. Sovereign has been represented at these meetings.
- 5.11 The Council's Corporate Programme Office has supported the team of both Council and SHA officers who have worked to support and inform Member approval; making a recommendation for a preferred structure and identifying the actions required to establish a functioning JV.

- 5.12 Ambitious timeframes were set with the original plan to have secured Executive approval by end of March 2018, this was subsequently moved to June 2018 to allow time for the detailed work to be completed on the proposed structure.
- 5.13 In conjunction with the Member Reference Group, an implementation plan was put together by the Council legal team. This identified a number steps including the development of heads of terms for the proposed JV and the governance arrangements.
- 5.14 Work has been completed under the following headings reflected in the recommendations of this report and the attached documentation. Subject to further amendment it is hoped approval will be given to progress to the implementation phase at the Executive meeting in June at which point a second phase of work will be planned.
- Agree recommended model
  - Liaise with other authorities that have established JVs
  - Explore implications of, and on, the Council's Asset Management strategy
  - Explore implications of, and on, the legal position of the Council
  - Explore implications of, and on, the financial and tax status of the Council
  - Explore implications of, and on, financial the Council's Housing strategy
  - Consider primary purpose of the JV; provision of affordable housing or commercial
  - Explore funding options
  - Identify key documents required
  - Establish the Governance structure
  - Establish Heads of Terms and consider implications
  - Identify initial projects
- 5.15 Sovereign has carried out parallel analysis, throughout the process; where possible this has been aligned.
- 5.16 Significant work has been done to ensure the constitutional, governance and procedural impact of setting up a JV is clear.
- 5.17 Going forward, both parties will take separate legal advice, as required.
- 5.18 If there is a decision to proceed, the first two WBC sites for redevelopment have been identified; a decanted supported scheme in Hungerford for circa 8 homes and a site in Newbury for circa 48 homes. A separate report covering the disposal of these two sites will be placed before Executive once the financial appraisal and business plan have been developed.

## 6. Proposal and benefits

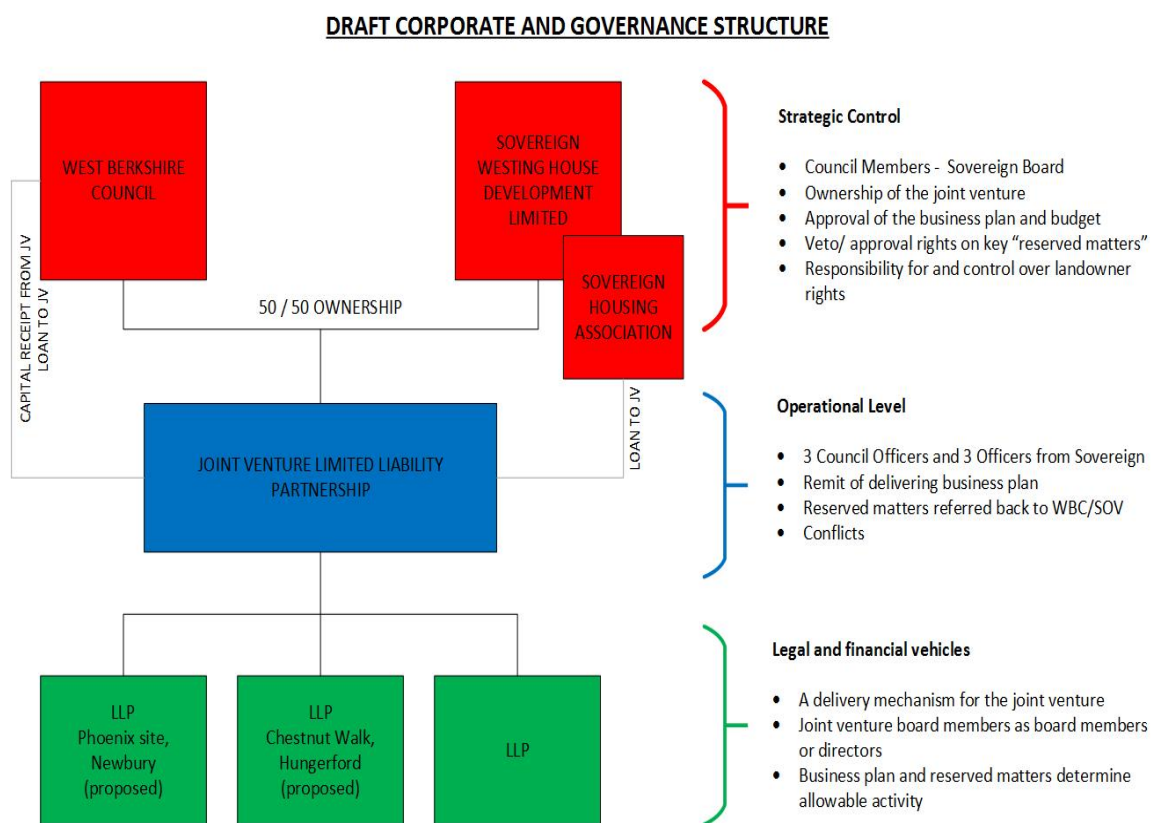
### 6.1 The proposal is:

- (1) that the Council and Sovereign will incorporate a new limited liability partnership (LLP) on a 50:50 basis.
- (2) that the LLP will acquire, fund, develop, sell and own (as applicable) a mixture of tenures with the primary aim of achieving the Council's housing objectives.
- (3) that developments will be brought forward on the basis of individual site appraisals to deliver a range of tenures – list is not exhaustive
  - Affordable rent (either limited by LHA or not)
  - Intermediate rent
  - Shared ownership
  - Market sale
  - Market rent
  - Starter homes
  - Discounted sale
  - Rent to buy
- (4) that the Council and Sovereign each contribute 50 per cent of the LLP's required capital. The estimates for the capital investment has not yet been calculated;
- (5) the LLP purchases identified sites from the Council or SHA at market value or potentially at an undervalue depending on the project.
- (6) that the LLP appoints:
  - (a) contractors and professional team for development, from Sovereign's frameworks where possible;
  - (b) Sovereign appointed as development manager on a costs incurred basis;
  - (c) Sovereign appointed as housing and asset management services on a costs incurred basis;
  - (d) the Council to provide corporate and financial services.
- (7) It is proposed that in the long run each the Council and Sovereign (LLP Members) is expected to receive a commercial rate of return on its equity investment from the profits generated in the LLP as properties are either let or sold. Each LLP Member would benefit from a stable long-term index-linked revenue stream as rental growth is linked to either CPI or RPI (as applicable)
- (8) Each of the LLP Members will provide equity to fund the project, with the funds provided to the LLP as interest bearing loans.
- (9) Each LLP Member is expected to receive a commercial rate of return on its equity investment from the profits generated in the LLP as properties are either let or sold. Each LLP Member would benefit from a stable long-term

index-linked revenue stream as rental growth is linked to either CPI or RPI (as applicable).

- (10) The Shared Ownership investment also provides the potential for capital growth, through house price inflation linked to staircasing receipts.
- (11) There are also valuable indirect benefits for the WBC and its local area including social and economic benefits from the inward investment into the provision of new housing, increased council tax revenues and potentially New Homes Bonus.
- (12) In this model, the WBC gains access to the SHA's technical and commercial developer skills, and benefits from the SHA's supply chain arrangements and volume buying power. Both LLP Members benefit from the pooling of funding and resources, and sharing of risk.
- (13) In this model the Council retains more control and influence over what happens in the development of a site once it has been sold.

## 7. LLP model and governance



## 8. Governance structure

- 8.1 The governance structure for the JV will be framed by the Council's role and rights as a member of the LLP as per Appendix B. There would also be a board charged with management of the LLP.

- 8.2 The members of the JV will retain strategic control over the operation of the vehicle through the right to approve, and monitor delivery of, a business plan and the requirement that certain listed decisions, referred to as "reserved matters", must be referred back to the owners (the Council / Sovereign) rather than being within the discretion of the board. For details of the reserved matter see schedule to Appendix D Heads of Terms.
- 8.3 The principle is that the JV partners approve the business plan and the board then has the remit and discretion to implement it, subject to the reserved matters. The level of discretion given to the board depends on the agreed structure (i.e. how prescriptive or flexible it is) and what the reserved matters are.
- 8.4 The board of the LLP would be given a role equivalent to role of a board of directors on a company. Although a board member of an LLP is not the same as the director of a company, it is common in the governance documents to treat the position as the same meaning the individual will have duties to act in the best commercial interests of the LLP for the benefit of both parties.
- 8.5 There would be a board of six, three to be appointed by Sovereign and three by the Council with the preference being for senior officers as per the recommendation at section 2.1 of this report. It would be possible for councillors or officers of the Council to be board members. On a JV of this nature, focused on delivery of operational matters, an officer board has been recommended with strategic and significant control retained to Councillors, via the LLP member rights.

## 9. Legal implications

- 9.1 Specific powers relating to setup of the JV/ LLP:
- (1) Under section 111 of the Local Government Act 1972 the Council may take any action (whether or not involving the expenditure, borrowing or lending of money or the acquisition or disposal of any property or rights) which is calculated to facilitate, or is conducive or incidental to, the discharge of any of their functions, which would include increase in housing provision in the district.
  - (2) Under section 1 of the Localism Act 2011, the General Power of Competence (GPC) the Council is allowed to enter into the JV and if this is essentially an activity for a commercial purpose then it should be noted that it cannot be undertaken directly by the Council under section 4 of the Localism Act 2011 but would need to be carried out through a company. However the main purpose of this JV is to develop and provide a mixture of housing with a primary purpose of achieving Council's housing objectives. This does not prevent the Council from making a return and does not mean that it turns it into a commercial purpose but rather the fact is that the Council would be acting in a commercial manner which is not prohibited.
  - (3) Under Section 120 of the Local Government Act 1972 the Council may also acquire property by agreement for the purposes of any of their functions or otherwise for the benefit, improvement or development of their area. Further under Section 2 of the Local Authority (Land) Act 1963 the Council is allowed to develop land. This provides a further combination of powers to the enablement of the JV.



## 9.2 Funding of the LLP

- (1) Sections 1 and 12 of the Local Government Act 2003 affords the Council broad powers allowing it to invest and to borrow, in each case either for purposes relevant to the performance of any of their functions or generally for the prudent management of their financial affairs. This would also be pertinent when there is change in the Council Investment and Borrowing Strategy as a result of funding of the JV for example by fund from the PWLB. Any changes to this Strategy would be the decision of the full Council and would be an amendment to the Strategy.

## 9.3 Disposal of Council Land

- (1) The Council will be required to obtain best consideration in accordance with Section 123 of the Local Government Act 1972. Usually this will be achieved by placing the property onto the open market or otherwise in respect of a sale agreed off market, demonstrating by way of professional valuation that it is achieving no less than market value for the property.
- (2) The Council can dispose of property for less than market value provided that consent is obtained from the Secretary of State. The Local Government Act 1972 General Disposal Consent (England) 2003 (General Consent 2003) is a wide reaching consent that allows disposal at an undervalue to promote economic, social or environment wellbeing. The difference between the market value and the consideration must not exceed £2 million, and a "professionally qualified valuer" must give a view as to the likely amount of the undervalue.
- (3) In determining what the value of the land is for this purpose it is the unrestricted value that is considered, i.e. the amount which would be received for the disposal of the property where the principal aim was to maximise the value of the receipt. Voluntary restrictions imposed by the Council, such as a restriction in the proposed lease to use the land for social housing, would not be taken into account.
- (4) If one of the general consents is not applicable then the Council would need to approach the Department for Housing, Communities and Local Government to obtain Secretary of State consent to the disposal on the proposed terms. There is not a statutory framework for this process so it would be uncertain as to how long it would take and whether it would be given.

## 9.4 State Aid

- (1) The state aid rules prohibit the Council from transferring its resources to a third party in a way that could distort competition and affect cross-border trade in the European Union. This needs to be considered in relation to the selection of Sovereign and the transfer of assets (e.g. land and funding) to the LLP or Sovereign.
- (2) Where an advantage is being given to the LLP or Sovereign, the Council's best approach to mitigate state aid risk is to rely on the market economy investor principle. This provides that if the Council can demonstrate that it is

acting as a rational private sector investor in similar circumstances would, then the activity is not a breach of the state aid rules. To rely on this the Council should provide funding and any other resources transferred to the LLP on market terms.

- (3) There is also an exemption in the state aid rules for support given to services of general economic interest (SGEI), which include social housing. This is potentially relevant if any resources will be transferred by either the Council or Sovereign at below market value, and will require additional terms to be included in the transfer documents to ensure that the requirements of the exemption are met. Structuring the transaction to comply with the SGEI exemption could be the best way of mitigating state aid risk in relation to any transfers of land at undervalue.

## 9.5 Procurement

- (1) The Council is subject to procurement legislation that requires it to run competitive tenders when awarding contracts for goods, works or services. If the JV is taken forward it would mean that the Council is selecting Sovereign without a tender. There are a number of grounds that could justify the Council doing so and present a low risk procurement position, namely:
  - there is no public contract in place between the Council and Sovereign – entering into the JV itself need not involve the awarding of a contract for goods, works or services;
  - this is public sector co-operation that is permitted under the procurement rules – both parties are public bodies for procurement purposes and could make use of inter-public body exemptions;
  - public contracts that do exist can be awarded without a procurement process in light of what is known as the Teckal exemption – this allows entities controlled by and delivering activity for public bodies to be awarded contracts without a competitive procurement process.
- (2) LLP is likely to be classified as a contracting authority under the Regulations. This is because it will fall within the definition of "bodies governed by public law". Corporate bodies set up by local authorities or other contracting authorities are often classified this way even though there is the potential to structure them so that they do not do so. The Regulations permit a controlling authority to contract directly (without a tender) with a controlled person and vice versa.
- (3) In order to meet the requirements in respect of the LLP any intermediate companies should also be structured to be contracting authorities. Although there are no plans in the current proposed structure for either the Council or Sovereign to purchase goods, works or services from any of the other parties in the arrangement, the potential for them to do so will therefore exist.
- (4) Where there is only one controlling authority, the Regulations also explicitly permit the controlled person to award contracts directly to the controlling authority, known as "reverse" Teckal after the case the exemption was originally based on. However, the Regulations do not explicitly permit or

prohibit an award by a controlled person where there is more than one controlling authority, as will be the case here. This may be relevant as the LLP may contract with the Council for corporate, finance and lending services, and with Sovereign for housing management and development management services.

- (5) It would be difficult to challenge successfully the award of such contracts on these grounds, particularly as they will be related to the wider strategic purpose, and will enable the LLP to meet the objectives for which it was established rather than to pursue alternative aims, perhaps competing with others on the market. The use of competitive procurement routes to appoint providers of services and works relating to the development, such as the frameworks would mitigate risk as the market would still be engaged with the opportunity.
- (6) The appointment of Sovereign for development and management services is to be done on a costs incurred basis rather than for profit which supports the applicability of the procurement exemptions outlined above.

## 10. Heads of Terms

- 10.1 The Heads of Terms (HoTs) have been agreed with Sovereign to represent the commercial agreement of the parties at the current stage of negotiations. These are contained in Appendix C. Whilst the HoTs reflect a reasonably advanced agreed position on the fundamental features of the joint venture, these HoTs are not exhaustive.
- 10.2 Brief description of the documents required to implement the JV/LLP as contained in the HoTs:

Document	Description
LLP Member Agreement	Core legal agreement incorporating key areas of how LLP will function including governance, dispute resolution and other key areas.
Overarching Strategic Land Agreement	Document detailing how sites will be transferred between the Council, Sovereign and LLP.
Funding Agreement	Document detailing how parties will provide funding to the LLP. This is not been finalised in the HoTs.
Development Management Agreement	Document detailing how the Development Management Service will be provided by the Sovereign to the LLP.
Asset Management Agreement	Document detailing how the Asset Management Service will be provided by the Sovereign to the LLP.
Residential Management	Document detailing how the Residential Management Service will be provided by the Sovereign to the LLP.

Document	Description
Agreement	
Corporate & Financial Services Agreement	Document detailing how the Corporate and Financial Services will be provided by the LLP.

## 11. Taxation Implications for the Council

- 11.1 Advice has been sought on the general tax implications for the Council of the proposed JV arrangements from PSTAX. (These are the Council's main advisors on VAT and employment taxes and are now working in partnership with Wilkins Kennedy Accountants to provide advice on the corporation tax implications of local authorities' commercial and quasi commercial activities).
- 11.2 The main advice note provided by PSTAX is included as Appendix D to this report. In summary this explains that a limited liability partnership, as proposed, will not be liable to pay corporation tax in its own right on any profit generated and that the Council will not be liable for corporation tax on any share of profits which it receives. It is, therefore, more tax efficient for the Council if the JV takes the form of an LLP rather than a limited company, and for the Council to be a partner in its own right, rather than by forming an arm's length company.
- 11.3 The normal arrangements for VAT will apply to the Council's activities relating to the joint arrangements, i.e. the Council can normally reclaim VAT which it pays on costs incurred and will charge VAT on any goods or services provided to the JV which would normally be subject to VAT. There is a limit on the amount of VAT which the Council can reclaim on costs which it incurs in connection with supplies of land which are exempt from VAT. For this reason, the supply of land to the JV may potentially affect the Council's ability to reclaim some VAT incurred. However, costs incurred by the Council in relation to the supply of land to the JV are not likely to be significant and further advice will be taken from PSTAX on how to minimise or avoid this issue, and on other more detailed operational aspects of the JV arrangement.

## 12. Conclusion

- 12.1 As detailed above, a significant amount of work has been done to establish that a JV with Sovereign would provide a suitable vehicle for the provision of additional mixed tenure housing in the District and that the preferred model for the JV is that of an LLP. It is, therefore, suggested that the recommendations within this report be accepted.

## 13. Appendices

- 13.1 Appendix A – Equalities Impact Assessment
- 13.2 Appendix B – Governance Structure
- 13.3 Appendix C – Heads of Terms
- 13.4 Appendix D – Tax Advice
- 13.5 Appendix E – Data Protection Impact Assessment

## Appendix A

### Equality Impact Assessment - Stage One

We need to ensure that our strategies, policies, functions and services, current and proposed have given due regard to equality and diversity as set out in the Public Sector Equality Duty (Section 149 of the Equality Act), which states:

- “(1) A public authority must, in the exercise of its functions, have due regard to the need to:***
- (a) eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under this Act;***
  - (b) advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it; this includes the need to:***
    - (i) remove or minimise disadvantages suffered by persons who share a relevant protected characteristic that are connected to that characteristic;***
    - (ii) take steps to meet the needs of persons who share a relevant protected characteristic that are different from the needs of persons who do not share it;***
  - (c) foster good relations between persons who share a relevant protected characteristic and persons who do not share it, with due regard, in particular, to the need to be aware that compliance with the duties in this section may involve treating some persons more favourably than others.***
- (2) The steps involved in meeting the needs of disabled persons that are different from the needs of persons who are not disabled include, in particular, steps to take account of disabled persons' disabilities.***
- (3) Compliance with the duties in this section may involve treating some persons more favourably than others.”***

The following list of questions may help to establish whether the decision is relevant to equality:

- Does the decision affect service users, employees or the wider community?
- (The relevance of a decision to equality depends not just on the number of those affected but on the significance of the impact on them)
- Is it likely to affect people with particular protected characteristics differently?
- Is it a major policy, or a major change to an existing policy, significantly affecting how functions are delivered?
- Will the decision have a significant impact on how other organisations operate in terms of equality?
- Does the decision relate to functions that engagement has identified as being important to people with particular protected characteristics?
- Does the decision relate to an area with known inequalities?
- Does the decision relate to any equality objectives that have been set by the council?

**Please complete the following questions to determine whether a full Stage Two, Equality Impact Assessment is required.**

<b>What is the proposed decision that you are asking the Executive to make:</b>	To approve the recommendations of this report and instruct officers to continue the work to establish the Joint Venture with Sovereign Housing Association and the full Business Plan for the Limited Liability Partnership.
<b>Summary of relevant legislation:</b>	
<b>Does the proposed decision conflict with any of the Council's key strategy priorities?</b>	No
<b>Name of assessor:</b>	June Graves
<b>Date of assessment:</b>	2.5.18

<b>Is this a:</b>		<b>Is this:</b>	
<b>Policy</b>	<b>No</b>	<b>New</b>	<b>Yes</b>
<b>Strategy</b>	<b>Yes</b>	<b>Already exists and is being reviewed</b>	<b>No</b>
<b>Function</b>	<b>No</b>	<b>Is changing</b>	<b>No</b>
<b>Service</b>	<b>No</b>		

<b>1 What are the main aims, objectives and intended outcomes of the proposed decision and who is likely to benefit from it?</b>	
<b>Aims:</b>	To increase and expedite the delivery of affordable housing in the District To maximise the opportunity of working together with SHA
<b>Outcomes:</b>	Increased provision, at pace, of affordable housing in the District
<b>Benefits:</b>	More flexible provision of affordable housing in the District

<b>2 Note which groups may be affected by the proposed decision. Consider how they may be affected, whether it is positively or negatively and what sources of information have been used to determine this.</b> (Please demonstrate consideration of all strands – Age, Disability, Gender Reassignment, Marriage and Civil Partnership, Pregnancy and Maternity, Race, Religion or Belief, Sex and Sexual Orientation.)		
<b>Group Affected</b>	<b>What might be the effect?</b>	<b>Information to support this</b>

Age		
Disability		
Gender Reassignment		
Marriage and Civil Partnership		
Pregnancy and Maternity		
Race		
Religion or Belief		
Sex		
Sexual Orientation		
<b>Further Comments relating to the item:</b>		
The impact of this decision will benefit all groups equally		

<b>3 Result</b>	
<b>Are there any aspects of the proposed decision, including how it is delivered or accessed, that could contribute to inequality?</b>	<b>No</b>
<b>Please provide an explanation for your answer:</b>	
<b>Will the proposed decision have an adverse impact upon the lives of people, including employees and service users?</b>	<b>No</b>
<b>Please provide an explanation for your answer:</b>	

If your answers to question 2 have identified potential adverse impacts and you have answered 'yes' to either of the sections at question 3, or you are unsure about the impact, then you should carry out a Stage Two Equality Impact Assessment.

If a Stage Two Equality Impact Assessment is required, before proceeding you should discuss the scope of the Assessment with service managers in your area. You will also need to refer to the [Equality Impact Assessment guidance and Stage Two template](#).

<b>4 Identify next steps as appropriate:</b>	
<b>Stage Two required</b>	
<b>Owner of Stage Two assessment:</b>	
<b>Timescale for Stage Two assessment:</b>	

Name: June Graves

Date:2.5.18

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Please now forward this completed form to Rachel Craggs, Principal Policy Officer (Equality and Diversity) ([rachel.craggs@westberks.gov.uk](mailto:rachel.craggs@westberks.gov.uk)), for publication on the WBC website.