

| ARMAGH CITY, BANBRIDGE AND CRAIGAVON BOROUGH COUNCIL | |
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| Equality screened by: | Mary Hanna Policy & Diversity Officer |
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AMENDMENT RECORD SHEET

Remove and destroy old pages. Insert new pages as indicated.

| Revision Number | Page Number | Date Revised | Description of Revision |
|------------------------|--------------------|---------------------|--------------------------------|
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1.0 INTRODUCTION

- 1.1 Armagh City, Banbridge and Craigavon Borough Council is committed to providing a safe and pleasant environment for all staff and customers who utilise its services. The Council's ambition is to provide excellent and customer focused services to all our users. Customer service has been identified as one of our top priorities and our aim is to further develop and embed a customer focused culture.
- 1.2 We recognise that there are times when our service may not meet the high standards we set and understand that customers will at times feel frustrated and we will endeavour to resolve any issues or complaints customers may have in a sensitive positive manner. Use of facilities or contact with our staff is not normally restricted by us. However, there are occasions when customers act in an unreasonable manner.
- 1.3 In particular, the Council will not tolerate abusive, aggressive or violent behaviour from customers towards members of staff (including Elected Members), or other customers, and will take the necessary steps to ensure that prompt and effective action is taken against any person engaging in such behaviour.

2.0 AIM / PURPOSE

- 2.1 The key purpose of this policy is to define what we consider to be unreasonable behaviour and abusive, aggressive or violent behaviour, to protect staff and customers and to ensure fairness and consistency when dealing with such behaviour. Our Council delivers a wide range of services and manages a number of programmes and facilities. This high level corporate policy provides guidance on the options available to the Council when dealing with such behaviour and the possible consequences to the customer which may include restrictions imposed on them, including exclusion from Council premises or contact with staff or elected members.

The principles of the policy apply to all customers in any public area within any Council owned or controlled property or land and any customers who may contact or engage with any Council staff member through any medium. The practical application of the policy will take into account the operational arrangements in the services that council operates.

3.0 POLICY DETAIL – DEFINING UNREASONABLE CUSTOMER BEHAVIOUR

- 3.1 Unreasonable behaviour may include one or two isolated incidents; as well as unreasonably persistent behaviour, which is an accumulation of incidents or behaviour over a longer period. Whilst it cannot be precisely defined, examples of conduct which may be considered as unreasonable are listed below (the list is not exhaustive):

- Abuse, intimidation and / or harassment of any staff members, customers or contractors on Council premises, either in person or through a telephone call or through any other electronic medium including social media.
- Inappropriate behaviour which includes, but is not limited to, disruptive or disorderly conduct, physical abuse, abusive or threatening language or behaviour, aggressive tone, language or behaviour.
- Theft, vandalism or other illegal acts on Council premises.
- Soliciting, selling, distributing or canvassing other than for Council approved activities.
- Being under the influence of alcohol and / or an illegal or intoxicating substance that causes, or is likely to cause, a public disturbance or interferes, or is likely to interfere with, others' use or enjoyment of Council facilities and resources.

- Loitering on the premises under circumstances that warrant alarm / concern for the health and safety of any person on the property or causes, or is likely to cause, fear, alarm or distress.
-
- Activity that would be a risk to their safety or to the safety of other staff or customers.
- Covertly recording meetings and conversations.
- Making excessive demands on the time and resources of staff with lengthy phone calls, emails to numerous Council departments or staff or detailed letters or emails every few days and expecting immediate responses.
- Making malicious, unwarranted or defamatory comments or making remarks which are related to any protected characteristic as set out under various anti-discrimination legislation in Northern Ireland.
- Making 'vexatious' requests in relation to section 14(1) of the Freedom of Information Act 2000 (**see Appendix 2**).
- Contravention or any perceived contravention of the councils safeguarding policy
- Continuing to attempt to make unwarranted or unjustified representations during ongoing attempts to resolve existing issues, or attempting to improperly influence or change aspects of the enquiry, during investigation.
- Continuing to attempt to pursue any matter, having exhausted all stages of the corporate or other statutory complaints procedure. This includes complaints repeated in their original form or where the substance of a complaint is the same as that originally made. This will also apply in cases where the Northern Ireland Public Services Ombudsman's Office has completed their investigation and closed the case.

Contact may be in person, by telephone, letter, e-mail, or any other electronic medium including social media.

4.0 DEALING WITH UNREASONABLE BEHAVIOUR – ACTIONS THE COUNCIL MAY TAKE

Considerations before action

- 4.1 We recognise that any decision to restrict access to Council services can have serious consequences for customers and we will ensure that we are appropriate and proportionate in the application of this policy. Due consideration to the following factors will be given before any restrictions are applied:
- Consideration to customer's individual circumstances, how and why they feel why they do, what may resolve the matter, that we have given them the opportunity to express their views and that we have considered them.
 - That the issue or complaint (if applicable) has been dealt with properly and in line with relevant Council procedures and statutory guidelines.
 - That the customer is now not providing any new significant information that might affect our view or decision on the issue.
 - That alternative routes, if applicable, have been explored to resolve the issue.
- 4.2 Staff who are experiencing difficult customer behaviour should endeavour to respond to customers courteously and focus on trying to resolve any issues, in line with existing procedures, and stay calm. However, if staff feel threatened by a customer, they should report their concerns and the reasons to the authorised officer. It is important to note that some customers considered to be unreasonable may be behaving this way because of a specific circumstance or difficulty, such as a mental health condition or other disability. Where this is indicated by staff or known to the authorised officer this will be taken into consideration and reasonable adjustments considered.

Actions the Council may take

- 4.3 As stated earlier, unreasonable behaviour can be in person, by telephone, contact by letter, email or any other electronic medium including social media. Restrictions will be tailored to the individual circumstances and may include one or more of the following (the list is not exhaustive and other actions may be considered of a proportionate and appropriate nature):
- Restricting all methods of contact to a particular form (eg by letter only).
 - Refusing to continue with telephone calls due to the abusive nature of the call after advising the customer that the call will be ended and the details of the call will be noted and discussed with the line manager.
 - Requiring contact to take place with a named member of staff or team as a single point of contact (SPOC), or at a particular time or place.
 - Offering a restricted time slot for necessary telephone calls.
 - Refusing to register and process further complaints about the same or similar matters.
 - Requiring the customer to make contact only through a third party, for example a solicitor / friend, carer acting on their behalf.
 - Exclusion for a period of time from one or more buildings controlled by the Council, due to the person's unreasonable behaviour **(see Appendix 3). (Please note a customer can be asked to leave the building for that day for example without any formal action being taken.)**
- 4.4 Where it is determined that formal implementation of the actions outlined above is necessary, the appropriate officer will, as far as is reasonably practicable, write to tell the person why it is believed their behaviour is unreasonable, the action that is being taken and the proposed duration of any action. The communication will be forwarded to the Customer Relations Officer for record keeping and tracking purposes and may also be reported to the Council's Health and Safety Officer. All actions must adhere to the Council's records management and disposal policy.

5.0 VIOLENT, AGGRESSIVE OR ABUSIVE BEHAVIOUR

- 5.1 There may be circumstances where a customer's behaviour exceeds unreasonable and becomes, violent, aggressive or abusive. In such cases, the following procedure will apply:
- 5.2 The following definition applies to the term violent, aggressive, abusive behaviour:

"Any incident, in which an employee is abused, intimidated, threatened or assaulted by a customer in circumstances arising out of the course of his or her employment. This includes use of tone or language which is aggressive, abusive, threatening or intimidating in nature and within any format of communication or interaction including verbal, face to face, by phone or written (including all electronic medium including social media.)."

6.0 DEALING WITH INCIDENTS OF VIOLENT OR ABUSIVE BEHAVIOUR

- 6.1 All such incidents should be recorded internally and reported to the PSNI where they believe a crime has been committed.
- 6.2 Awareness of the specific needs of disabled people, particularly those with certain mental health conditions, is raised to guide the staff response to inappropriate or violent behaviour.

- 6.3 This should be targeted at staff who meet customers on a face to face basis (in any council premises or off site), as well as staff whose main contact is via the telephone.
- 6.4 In addition, it is important that staff who only have contact with customers via email or letter or any other electronic / digital media are able to identify unreasonable, abusive or threatening language and follow this policy and any departmental procedures.
- 6.5 If a customer is aggressive, abusive or violent whilst in a Council owned or operated premises , members of staff should clearly state that such behaviour will not be tolerated. If the behaviour continues, the authorised person should be informed and the customer should be asked to leave the site immediately (**see Appendices 3 and 4 for exclusion and authorisation**) and refrain from entering the building again until further notice. If safe to do, depending on the nature of incident, the member of staff should remove themselves from the situation. For telephone calls, members of staff should advise that they are going to disconnect the call if the behaviour continues
- 6.6 In cases of abusive 'correspondence' via letter or email, or social media postings as far as is reasonably practicable, the customer should be written to by the head of department to advise that their behaviour and / or language will not be tolerated. A line manager should be notified of the situation and will assess and record any ongoing risk to remaining staff and public.

7.0 INCIDENTS OFF SITE

- 7.1 This policy is applicable to all workers who are required to work 'off site' and visit other premises as part of their duties. It is the responsibility of management and staff to ensure that Council lone working policies are followed and appropriate arrangements are put in place.

8.0 REVIEW

- 8.1 Customers have the right of appeal to any restrictions imposed on them under Section 4 of this policy. Any appeal should be made to the Customer Relations Officer, who will record and acknowledge the appeal and have it referred to an appropriate senior manager for processing. The review will be undertaken by a senior officer who was not involved in the original decision making process and will consider if the process has been applied correctly and will consider any developments since the original decision or any additional information provided including any points made by the person requesting the review. The review process does not apply to any sanction imposed under Section 5 of this policy.

9.0 RELATED POLICIES / PROCEDURES

- Corporate Health and Safety Policy
- Lone Working Policies and Procedures
- Departmental Operating Procedures
- Risk Management Policy
- Safeguarding policy
- Surveillance Policy

10.0 COMMUNICATION OF POLICY

- 10.1 Notices will be displayed at all Council premises advising visitors that inappropriate, aggressive, violent, or abusive behaviour will not be tolerated and may result in their exclusion from Council premises or the PSNI being called. The policy will be available on the Council website.
- 10.2 The policy and related documentation will be made available in alternative languages upon request.

Definitions

An **“authorised person”** for the purposes of any offence under the Public Order (Northern Ireland) Order 1987 is as defined under Article 23(5) of the Order as follows, in relation to a public building, “a person authorised in writing by the body or person owning or lawfully occupying or using the building to give directions” as per appendix 4. The authorised person will normally be the person in charge of the premises at the time of any incident, this maybe the duty officer, supervisor, attendant/operative in charge and will include any person ‘acting up’ or employed by a company providing services to the council in the management of security of the premises.

A **‘member of staff’** is any person employed by Armagh City Banbridge and Craigavon Borough Council, for the purpose of this policy this definition covers security services and Elected Members.

A **“customer”** is any member of the public (other than staff) who makes contact (in any form) with Council / a staff member, elected member and / or enters Council premises to make enquiries, conduct business, carry out work, use facilities or visit the premises for any purpose. This would also include contractors working on council premises

A **“telephone caller”** is a member of the public who calls any Council staff member.

A **“minor”** is a person under 18 years of age.

A **“vulnerable adult”** is a person aged 18 or over as defined under the Safeguarding Vulnerable Groups (NI) Order 2007 (as amended)

“Armagh City, Banbridge and Craigavon Borough Council premises” are any premises, properties, land or facilities owned or controlled by Council.

Note: a person may be upset, angry, awkward or difficult without being abusive or violent.

What is a Vexatious Request?

It is important to remember that section 14(1) of the Freedom of Information Act 2000, which relates to vexatious requests, can only be applied to the request itself, and not the individual who submits it. An authority cannot, therefore, refuse a request on the grounds that the requester himself is vexatious. Similarly, an authority cannot simply refuse a new request solely on the basis that it has classified previous requests from the same individual as vexatious.

We define a vexatious request as:

“A request that is likely to cause distress, disruption or irritation, without any proper or justified cause”

A vexatious request may include one or two individual requests for information, or may form part of a wider pattern of vexatious behaviour. For example, if there is a wider dispute or it is the latest in a lengthy series of overlapping requests.

However, we will not automatically refuse a request simply because it is made in the context of a dispute, or if it forms part of a series of requests.

We will consider each request for information on its own merits, and will not automatically refuse a request because the individual may have caused problems in the past. We will ensure that we consider whether the request (and not the requester) is vexatious, with our focus being on the request itself.

Where a request is considered to be vexatious we may make the decision not to provide the information requested, referring to relevant guidance from the Information Commission on vexatious requests.

Examples of what we might consider to be vexatious requests are shown below. The list is not exhaustive, and for a request to be considered as vexatious it is likely that more than one of the examples is relevant:

- Submission of obsessive requests with very high volume and frequency of correspondence.
- Requests for information the requester has already seen, or clear intention to reopen issues that have already been considered.
- Where complying with the request would impose significant burden on the Council in terms of expense, and negatively impact upon our ability to provide service to others. In this situation, we will also consider section 12 (exemption where cost exceeds the appropriate limit) of the Freedom of Information Act.
- Where the requester states that the request is actually meant to cause maximum inconvenience, disruption or annoyance.
- Where the request lacks any serious purpose or value. An apparent lack of value would not usually be enough on its own to make a request vexatious, but may do when considered with other examples.
- Harassing the Council. This could include very high volume and frequency of correspondence, or mingling requests with accusations and complaints.

Exclusion from Council Operated Premises Overview

The Council operates a number of buildings / facilities within the Borough which provide a wide range of services and, on occasions, customer behaviour can be such that they may be asked to leave a facility.

- Where reasonably practicable, staff will request a visitor who is exhibiting the inappropriate behaviour to desist from such behaviour. If the behaviour continues, the staff member will advise the customer that continued unreasonable behaviour may lead them to being requested to leave the premises.
- If the behaviour continues, the matter will be reported to the 'authorised person' who shall assess the situation and ask the customer to leave. If the customer fails to comply or responds in an abusive manner, the authorised person will warn the customer if they fail to comply the police may be contacted. If the customer still refuses to comply the authorised officer will contact the police.

(the authorised officer will contact the PSNI at his / her discretion where there is a reasonable suspicion of illegal activity or a threat to staff or customer safety)

Formal exclusion from one or more facilities controlled by the Council will normally be for a specified duration, in extreme cases this exclusion may be permanent. The customer should be notified in writing with a copy sent to the Corporate Customer Relations Officer. The duration of all exclusions will be determined on a case by case basis. In the event of exclusion of minors and vulnerable adult's, parent's, guardians or carers should be contacted and the excluded individual (s) should remain at the site until they arrive.

Authorisation – Public Order Northern Ireland 1987

Any person who enters a public building as a trespasser or who, not being engaged in the discharge of duties, or the performance of obligations connected with activities normally carried out in that public building, may be given a direction to leave that building by an authorised person, or by a police officer at the request of the authorised person. Failure to comply with such a direction may render that person guilty of an offence under the Order.

Council will ensure that officers – **authorised person (s)** – have authorisation, in writing, under the Order and this policy so that such authorisation can be displayed, if required, to any person being directed to leave the premises.

Policy Screening Form

Policy Title

Unreasonable Customer Behaviour Policy (Includes abusive, aggressive or violent Behaviour)

Brief Description of Policy (please attach copy if available). Please state if it is a new, existing or amended policy.

This is a new policy. The Council is committed to providing a safe and pleasant environment for all staff and customers who utilise its services. Use of facilities or contact is not normally restricted by us, however there are occasions when customers act in an unacceptable or unreasonable manner. The Council will not tolerate abusive, aggressive or violent from customers towards members of staff (including Elected Members), or other customers and will take the necessary steps to ensure that prompt and effective action is taken against any person engaging in such behaviour.

Intended aims/outcomes. What is the policy trying to achieve?

The purpose of the policy is to define what we consider to be unreasonable behaviour and to ensure fairness and consistency when dealing with such behaviour. The policy applies to all customers in any public area within any Council owned or controlled property and any customers who may contact any Council staff members through any medium. The policy also applies to contractors and sub-contractors and other service providers who may be working on Council premises, whether or not these are open to the public.

Policy Framework

Has the policy been developed in response to statutory requirements, legal advice or on the basis of any other professional advice? Does this affect the discretion available to Council to amend the policy?

Health & Safety at Work legislation.

Are any Section 75 categories which might be expected to benefit from the policy? If so, please outline.

All categories will benefit but particularly those who may be especially intimidated by abusive, aggressive or violent behaviour e.g. the elderly, the very young, women, people with disabilities and other vulnerable adults.

Who initiated or wrote the policy (if Council decision, please state). Who is responsible for implementing the policy?

| | |
|--|--|
| Who initiated or wrote policy? Joanne Grattan, Customer Services Manager Mary Hanna, Policy & Diversity Officer Eamonn Kelly, Head of Governance and Democratic Services | Who is responsible for implementation? Facility managers |
|--|--|

Are there any factors which might contribute to or detract from the implementation of the policy (e.g. financial, legislative, other)?

None identified

Main stakeholders in relation to the policy

Please list main stakeholders affected by the policy (e.g. staff, service users, other statutory bodies, community or voluntary sector, private sector)

Customers
Council staff
Elected members
Contractors
Sub-contractors

Are there any other policies with a bearing on this policy? If so, please identify them and how they impact on this policy.

Corporate Health & Safety policy
Lone Working Procedures
Departmental Operating Procedures

Available Evidence

Council should ensure that its screening decisions are informed by relevant data. What evidence / information (both qualitative and quantitative) have you gathered to inform this policy? Specify details for each of the Section 75 categories.

The chief source of evidence is incident reports of previous violent, disruptive or abusive behaviour in Council facilities and the views of facility managers based on their experience.

| Section 75 category | Evidence |
|-------------------------|-----------|
| Religious belief | See above |
| Political opinion | See above |
| Racial group | See above |
| Age | See above |
| Marital Status | See above |
| Sexual Orientation | See above |
| Men and Women Generally | See above |
| Disability | See above |
| Dependants | See above |

Needs, experiences and priorities

Taking into account the information gathered above, what are the different needs, experiences and priorities of each of the following categories in relation to this particular policy / decision?

| Section 75 category | Needs, experiences and priorities |
|-------------------------|---|
| Religious belief | May be cultural differences (particularly attitudes towards women) but this does not excuse abusive, aggressive or violent behaviour |
| Political opinion | Not applicable |
| Racial group | May be cultural differences (particularly attitudes towards women) but this does not excuse abusive, aggressive or violent behaviour Will need to ensure policy and related documentation including posters made available in required languages |
| Age | People of all ages can engage in disruptive behaviour Elderly people and the very young more likely to be intimidated by such behaviour Particular issue where disruption is caused by unaccompanied minors |
| Marital status | Not applicable |
| Sexual orientation | No data available but possible that individuals may be subject to abuse in Council facilities because of their sexual orientation. |
| Men and women generally | Both genders may be involved in such behaviour Women more likely to be intimidated by such behaviour |
| Disability | The policy recognises that a person's behaviour may be affected by certain disabilities and this will be taken into consideration in decisions on action taken. Risk assessment will be undertaken as required and reasonable adjustments made. |

| | |
|------------|--|
| | <p>Need to ensure that people with disabilities are not subject to abuse or intimidated by disruptive behaviour.</p> <p>Policy and related documentation will be available in alternative formats.</p> |
| Dependants | Issue with regard to control of minors by parents / guardians |

Screening Questions

| 1. What is the likely impact on equality of opportunity for those affected by this policy for each of the Section 75 categories? | | |
|---|---------------|--|
| Category | Policy Impact | Level of impact (Major / minor / none) |
| Religious belief | None | None |
| Political opinion | None | None |
| Racial group | None | None |
| Age | None | None |
| Marital status | None | None |
| Sexual orientation | None | None |
| Men and women generally | None | None |
| Disability | None | None |
| Dependents | None | None |

Comment: The policy should ensure a safer and more pleasant environment for all.

| 2. Are there opportunities to better promote equality of opportunity for people within the Section 75 categories? | | |
|--|-------------------------|------------------------|
| Category | If yes, provide details | If no, provide reasons |
| Religious belief | No | No |
| Political opinion | No | No |
| Racial group | No | No |
| Age | No | No |
| Marital status | No | No |
| Sexual orientation | No | No |
| Men and women generally | No | No |
| Disability | No | No |
| Dependents | No | No |

Comment: The policy should ensure a safer and more pleasant environment for all.

| 3. To what extent is the policy likely to impact on good relations between people of different religious belief, political opinion, or racial group? | | |
|---|--------------------------|--|
| Category | Details of Policy Impact | Level of impact (major / minor / none) |
| Religious belief | N/a | N/a |
| Political opinion | N/a | N/a |
| Racial group | N/a | N/a |

| 4. Are there opportunities to better promote good relations between people of different religious belief, political opinion or racial group? | | |
|---|-------------------------|------------------------|
| Category | If yes, provide details | If no, provide reasons |
| Religious belief | N/a | N/a |
| Political opinion | N/a | N/a |
| Racial group | N/a | N/a |

Additional Considerations

Multiple Identity

Generally speaking, people fall into more than one Section 75 category (for example: disabled minority ethnic people; disabled women; young Protestant men; young lesbian, gay and bisexual people). Provide details of data on the impact of the policy on people with multiple identities. Specify relevant s75 categories concerned.

Policy aims to provide a safer and more pleasant environment for all in Council facilities

Disability Discrimination (NI) Order 2006

Is there an opportunity for the policy to promote positive attitudes towards disabled people?

Not directly but any abuse against people with disabilities using Council facilities will be covered by the policy

Is there an opportunity for the policy to encourage participation by disabled people in public life?

Not applicable

Screening Decision

A: NO IMPACT IDENTIFIED ON ANY CATEGORY – EQIA UNNECESSARY

Please identify reasons for this below

The aim of the policy is to provide a safer and more pleasant environment in Council facilities for all (customers and staff) and will assist Council in meeting its duty of care. Potential impacts have been identified with regard to age, disability and race but are addressed within the policy.

B: MINOR IMPACT IDENTIFIED – EQIA NOT CONSIDERED NECESSARY AS IMPACT CAN BE ELIMINATED OR MITIGATED

Where the impact is likely to be minor, you should consider if the policy can be mitigated or an alternative policy introduced. If so, EQIA may not be considered necessary. You must indicate the reasons for this decision below, together with details of measures to mitigate the adverse impact or the alternative policy proposed.

[Empty box for reasons and mitigation details]

C: MAJOR IMPACT IDENTIFIED – EQIA REQUIRED

If the decision is to conduct an equality impact assessment, please provide details of the reasons.

[Empty box for reasons for EQIA]

Timetabling and Prioritising

If the policy has been screened in for equality impact assessment, please answer the following questions to determine its priority for timetabling the equality impact assessment.

On a scale of 1 – 3, with 1 being the lowest priority and 3 being the highest, assess the policy in terms of its priority for equality impact assessment.

| Priority criterion | Rating (1-3) |
|--|--------------|
| Effect on equality of opportunity and good relations | |
| Social need | |
| Effect on people’s daily lives | |

The total rating score should be used to prioritise the policy in rank order with other policies screened in for equality impact assessment. This list of priorities will assist the Council in timetabling its EQIAs.

Is the policy affected by timetables established by other relevant public authorities? If yes, please give details.

Monitoring

Effective monitoring will help the authority identify any future adverse impact arising from the policy. It is recommended that where a policy has been amended, or an alternative policy introduced to mitigate adverse impact, monitoring be undertaken on a broader basis to identify any impact (positive or adverse).

Further information on monitoring is available in the Equality Commission's guidance on monitoring www.equalityni.org

Identify how the impact of the policy is to be monitored

The policy will be monitored each year to determine how many times the exclusion policy has had to be used and its effectiveness.

Approval and Authorisation

A copy of the screening form for each policy screened should be signed off by the senior manager responsible for that policy. The screening recommendation should be reported to the relevant Committee / Council when the policy is submitted for approval.

| | | |
|-------------|----------------------------|------|
| Screened by | Position / Job title | Date |
| Mary Hanna | Policy & Diversity Officer | |
| Approved by | Position / Job Title | Date |
| | | |

Please forward a copy of the completed form with policy attached to mary.hanna@armaghbanbridgecraigavon.gov.uk who will ensure that screening forms and policies are available on the Council website.

This officer is also responsible for issuing reports on a quarterly basis on those policies "screened out for EQIA". This allows stakeholders who disagree with this recommendation to submit their views. In the event of any stakeholder disagreeing with the decision to screen out any policy, the screening exercise will be reviewed.