



Lettings Policy

January 2022 - 2025

Lettings Policy

Adopted / Date Reviewed:	January 2022
Review Period:	3 Years
Next Review:	January 2025
Contact Officer:	Mark Coupland, Corporate Head of Customers
Policy Version:	Second version of policy
Version Reviewed by:	CLT, ELT January 2022
Version Approved by:	Board, ELT January 2022
Policy Links:	<ul style="list-style-type: none"> Home Choice Lincs Policy East Lindsey and Boston Joint Housing Register Void Management Policy Complaints and Compensation Policy Tenancy Policy Succession Policy Mutual Exchange Policy Equality & Diversity Policy Health & Safety Policy

Brief Policy Summary:

This policy sets out the approach that will be taken by LHP, working within the local authority's choice-based lettings schemes it currently participates in, to effectively market and let our available social and affordable rented homes.

1. Introduction	4
2. Objective	4
3. Scope.....	5
4. Allocating and Letting our Homes	5
5. Eligibility for Housing	5
6. Suitability for LHP accommodation	7
7. Property Type Eligibility	8
8. Suitability for a particular property type	8
9. Transfers	9
10. Adapted properties and applicants requiring adaptations.....	9
11. Hard to Let properties	9
12. Letting’s standard	10
13. Homes for Older people	10
14. Succession.....	10
15. Local lettings policies	11
16. New build homes	11
17. Sensitive Lettings	11
18. Management Transfers.....	12
19. Lettings to employees and their close relatives	12
20. Excluding Applicants	12
21. Implementation, Monitoring and Performance	15
STAGE 1: SCREENING	16

1. Introduction

Lincolnshire Housing Partnership aims to make best use of its housing stock and address housing need in its areas of operation. This policy sets out how we let our homes to suitable applicants, how we will market our homes and what checks, exclusions, or exceptions we may apply.

The policy is aligned with the Regulatory Standards set by the Regulator of Social Housing, specifically: -

Customer Involvement and Empowerment Standard

- Customer service, choice, and complaints
The options for customers looking to rent a home with LHP, and the type of home they may be eligible for are described in this policy.
- Understanding and responding to the diverse needs of customer
This policy ensures that customers are treated fairly and equally, whether they are new customers or those already living in LHP homes and who may be affected by allocations and lettings in their neighbourhood.

Tenancy Standard

- Allocations and mutual exchanges
This policy describes how LHP will make best use of stock when letting homes, make lettings which are compatible with the purpose of the housing type, contribute to Local Authorities' strategic housing function and support the creation of sustainable communities.

2. Objective

The policy objectives are to:

- Let homes to suitable customers
- Be consistent, fair, and transparent in the way we let our homes
- Make sure applicants understand their rights and responsibilities
- Assist our local authority partners in meeting housing need in line with our local housing partnership commitments
- Minimise the number of vacant homes and associated rent loss
- Ensure that all homes are let to our agreed lettings standard
- Help create sustainable communities

Equality and Diversity

LHP recognises that its customers and staff come from diverse backgrounds, with varying experiences and needs. LHP is committed to promoting equality and fairness and combating discrimination. This applies to everyone, regardless of gender, racial or ethnic background, disability, religion or belief, sexual orientation gender reassignment, age, marital or parental status

3. Scope

The policy will be applied to all applicants for housing with LHP, either from the relevant housing registers through our choice-based lettings partnership agreements, or applicants from other sources, such as Kwik Key, Right Move, social media, or other sources.

4. Allocating and Letting our Homes

LHP operates across two main Local Authority areas, North East Lincolnshire and Lincolnshire and uses the Homes Choice Lincs and East Lindsey and Boston Joint Housing Register local authority schemes, complemented by other methods, to allocate homes. In addition, we have properties and work with our partners in West Lindsey and South Kesteven District Council areas in order to advertise or receive nominations for homes in these areas.

Each Local Authority policy adheres to the legal requirements of the Part 6 of the Housing Act 1996 (as amended) and therefore meets all statutory requirements relating to eligibility and qualification for housing. Local Authority policies are framed to provide Reasonable Preference to those with housing need, and LHP participation with the Local Authority scheme therefore ensures that those with housing need have priority access to a proportion of homes.

Customers can apply for housing through the Local Authority scheme. The Local Authority policy will usually describe the types of properties eligible applicants can apply for, how eligible applicants will be prioritised, and the method of allocating homes.

LHP may infrequently advertise some homes outside of the local scheme; either to attract new customers from different markets, or to address an imbalance in the locality. These homes will be advertised on a first come first served basis and may be advertised in a number of ways including web-based platforms such as Rightmove.

The decision to allocate a home through one of these alternative methods, and the selection of the allocation's method, will be at the discretion of the Lettings Manager. Consideration will be given to any issues related to the previous tenancy, any known local issues, demand for the property and existing arrangements with the Local Authority.

Applicants for these properties will be assessed to check that they are eligible for housing with LHP as they have not already been verified by a Local Authority. Customers can find out more about how to access a home via Find a Home page on the LHP website.

5. Eligibility for Housing

Anyone aged 16 or over and in housing need will be eligible to apply for LHP homes. Applicants between the ages of 16 and 18 will be granted an Equitable Tenancy. This enables a customer under the age of 18 to occupy a property despite being unable to hold a legal title.

Applicants for properties allocated by a direct let will be subject to Right to Rent eligibility check to ensure that they qualify to rent a home.

LHP will require every member of the household over the age of 18 will be required to supply one of the following documents, in person, so we can verify the documents.

List A (Group 1)

- UK Passport / EEA National Passport / Identity Card
- Registration Certificate for Permanent Residence of EEA National
- EEA Family Member Permanent Residence Card
- Biometric Residence Permit with Unlimited Leave
- Passport or Travel Document Endorsed with Unlimited Leave
- UK Immigration Status Document Endorsed with Unlimited Leave
- A Certificate of Naturalisation or Registration as a British Citizen.

If one of the above documents cannot be provided the applicant(s) will need to provide TWO of the following:

List A (Group 2)

- UK Birth/Adoption Certificate / Full/Provisional UK Driving Licence (Photo Card)
- A Letter from HM Prison Service / Criminal Record Check
- A Letter from a UK Government Department or Local Authority
- A Letter from National Offender Management Service
- Evidence of current or previous service in UK Armed Forces
- A letter from police confirming certain documents reported stolen
- A letter from a Private Rented Sector Access Scheme
- A letter of attestation from an employer
- Benefits Paperwork (Must be from within the last 3 months)
- A letter from a UK Further or Higher Education Institute

A letter of attestation from a UK passport holder working in an acceptable profession. If you only have limited leave to remain in the UK, then you will need to provide the following:

- A valid passport endorsed with a time-limited period
- Biometric immigration document with permission to stay for a time limited period
- Non-EEA National Residence Card
- UK immigration status document with a time limited endorsement from the Home Office

6. Suitability for LHP accommodation

In order to ensure that lettings are suitable and sustainable we will carry out a number of checks prior to proceeding with an offer of accommodation.

a. Affordability

All applicants will undergo a “pre-tenancy financial assessment” to confirm their ability to pay their rent and other commitments (such as Council Tax, utilities, food and other household expenditure, any debt or loan repayment commitments etc.). Where an assessment indicates that an applicant would be unable to sustain the tenancy from a financial point of view the offer of accommodation will not proceed, and they will be given advice regarding how to improve their circumstances so that they are “tenancy ready”.

All applicants are required to pay a minimum of one week’s rent (pro rata based on sign up day) in advance at sign-up in order to ensure that the tenant is complying with the terms of the tenancy agreement for rent to be paid weekly in advance, and also to confirm and reinforce the ethos that payment of rent is the tenant’s responsibility, regardless of any benefit entitlement.

b. Support to sustain a tenancy

Where an individual may require care or support to be able to maintain their tenancy, we will request the appropriate care and support plans from the relevant agencies. We may identify where a digital solution may be appropriate to assist an applicant in sustaining a new tenancy. Even when these are in place there may be some circumstances where LHP accommodation may be considered unsuitable as the level of support need is considered to be too high. A risk-based approach will be taken and full consideration of the individual and their circumstances, in liaison with relevant agencies, will be carried out before any decision to decline housing.

c. Housing applicants with convictions

We will ask applicants to disclose any unspent convictions as part of their application for housing with LHP. Where an applicant has declared unspent convictions, we will carry out a risk assessment. Applicants may be refused housing if there is reason to suppose that the applicant is likely to pose a risk to their household, neighbours, or wider community. The risk assessment will also consider the type of property and suitability of the area to ensure that this does not pose a risk to the ex-offender.

Where a Schedule 1 (those who pose a risk to children) is disclosed or we become aware that the applicant is subject to MAPPAs (Multi Agency Public Protection Arrangements) imposed on registered sexual violent and/or dangerous offenders). We will work with those agencies supporting the MAPPAs to ensure that the proposed property is suitable. Applicants may be refused where the risk is deemed to be high/difficult to manage or we do not have a suitable property.

d. Homeowners

Applicants who are homeowners may apply for re-housing if they meet any of the criteria below:

- They need sheltered accommodation and age banded accommodation
- Their mortgage lender is repossessing their home.
- Their relationship has broken down and as a result they need to sell their home.
- Their current home is unsuitable due to ill health or disability.

7. Property Type Eligibility

a. LHP will use the same property size eligibility that is used to assess the benefit eligibility for assistance with housing costs. Using these rules, a separate bedroom is required for.

- A couple (aged 16 or over) who live together as partners
- A single adult
- Two children under 10 who are part of the same family
- Two children of the same sex under 16 who are part of the same family
- Gender reassignment, in respect of children sharing rooms who are transitioning or identify as a sex different to that assigned at birth.
- any remaining children who cannot be paired according to the rules above.

b. In order to make best use of stock LHP will always seek to maximise the occupancy of a property in accordance with the guidance above. However, there may be occasions when an allocation is made to a household who will under-occupy a property, with consideration of affordability. Any such decision will be at the discretion of the Lettings Manager and is expected to be in exceptional circumstances.

8. Property Suitability

a. Household Size

All LHP properties are given a bedroom number and a maximum number of occupants based on the size of the home. LHP will not make an offer of a tenancy where we believe that the occupants would immediately or in the near future be deemed to be overcrowded.

b. Adaptations

Where a property has adaptations to suite a particular physical need, preference will be given to applicants with this requirement. LHP will work with Local Authorities and Occupational Health to assess the requirements of the applicant.

9. Transfers Criteria

Current LHP tenants who register on either of the local authority schemes will be assessed by the administering authority and awarded a priority band in accordance with the relevant policy. Internal Transfers will normally only be accepted where all accounts are free of debt, all terms and conditions of the tenancy have been met and a satisfactory tenancy inspection has been completed.

We will not accept applications for transfer from tenants with Starter Tenancies until the tenancy has been converted to an Assured Tenancy unless in exceptional circumstances.

Where a transfer applicant is currently banded as having no or low housing need, a “like for like” move within the immediate vicinity (within a 2-mile radius) will not generally be approved. An exception may be allowed for residents of sheltered schemes who may have a wish to move from a studio to one-bedroom flats. Additionally, a transfer applicant classed as having no or low housing need would need to have been resident in their current home for 2 years before a transfer could be considered.

Where LHP is seeking to rehouse customers as a permanent decant LHP will work with the customer to identify a suitable alternative property to be offered directly. Customers may also be advised to register with the local authority scheme in order to potentially create a wider choice of properties.

We will continue to publicise and promote mutual exchange as an option for current tenants who wish to transfer and will provide information and advice to current tenants to assist them, as appropriate. Full details of how we will deal with applications for a Mutual Exchange are included in the LHP Mutual Exchange Policy.

10. Adapted properties and applicants requiring adaptations

Properties which are either fully adapted or have a number of major adaptations will be advertised with these details and priority for these will be given to applicants who have a need for those adaptations. This will include, level access showers, ramped access, widened doorways, hoists, stairlifts etc. Where no suitable applicant has bid on the property under one of the choice-based lettings scheme we may choose to contact partner agencies to identify a suitable applicant who has a need for the adaptations, to make best use of the available stock. We will only remove adaptations where all potential options to find a suitable tenant with a requirement for the adaptations have been exhausted. Adaptations will be reused and recycled if possible.

11. Hard to Let properties

Where a property is considered “Hard to Let” LHP may use other means to advertise the property outside of the Local Authorities allocation scheme.

We will define a property as hard to let if there have been no suitable bids received after advertising through two CBL cycles, where no nomination has been made by the Local Authority or where similar properties in the location have failed to attract suitable bids via CBL on a regular basis.

We may decide to market the property using alternative mediums such as social media, in order to secure a suitable tenant. For properties advertised this way we are able to relax the criteria for “bedroom need”, providing the applicant can demonstrate affordability of a home larger than their needs. Other criteria, such as age restrictions for older person’s accommodation, may also be relaxed.

Properties, or types of properties, that remain difficult to let and have a sustained adverse effect on the surrounding area, community and rent loss will be subject to an appraisal, as per our Asset Management Strategy. The appraisal will determine actions necessary to remedy the issue and may include improvements or alterations, environmental improvements or modifications, conversion, or disposal.

12. Letting’s standard

All of our properties will be let to our “Letting’s standard” which is periodically reviewed and amended, in consultation with customers. This sets out the minimum standard that our properties will be at when we sign up our new tenants. Depending on the condition of the property we may offer a decoration allowance, which will be based on the type of property, number and size of the rooms, current condition of the property, and the demand for the property.

13. Homes for Older people

In addition to our general needs stock there are certain properties that we specifically designate for “older people” and/or people with assessed need for support. This includes sheltered schemes, which may have communal lounge, kitchen, laundry, lift, LifeLine services, etc.; grouped flats that are designated for older people as part of a localised approach to make best use of our stock; bungalows that were grouped by design to create an older person’s community and which in some cases are attached to sheltered schemes (with tenants having access to and use of communal facilities which they are then service charged for).

Age criteria will apply to the properties described above. However, there may be circumstances when this restriction may be waived e.g., medical need or if a property is designated hard to let. This will be assessed on a case-by-case basis and will include considerations of community cohesion and tenancy sustainability.

14. Succession

Applications for succession to a tenancy are considered by the housing teams, in line with relevant legislation. Where an occupant is entitled to succeed the tenancy, but the property is unsuitable e.g., due to size or age restriction, they will be required to register

on the relevant cbl scheme and will be awarded priority. They will be expected to place bids through the scheme, and this will be monitored to ensure that they are able to secure suitable alternative accommodation.

15. Local lettings policies

In order to create and maintain balanced and sustainable communities we may implement local lettings policies, in agreement with our local authority partners. The policy requires:

- An evidence base to understand the issues the policy is seeking to address. This evidence base can then be used to develop a framework of targets for performance management measures,
- Clear criteria for the prioritisation of applicants.
- An outline of the approach to review. Local Lettings Policies should be reviewed at least every 2 years.

16. New build homes

The key objective when allocating new build homes is to achieve balance and sustainability in the estate and the wider community. Local Lettings Policies for new build developments are common practice and will typically include:

- The objective to create a balanced, sustainable community, with a mix of residents successfully managing their tenancies.
- To provide low income working households access to affordable housing.

For new build properties in the North East Lincolnshire Council area, we have an agreement to offer additional priority to serving or former members of the Armed Forces in order for them to access secure and affordable housing (up to a maximum of 5 lettings per year).

a. S106 Restrictions

When allocating and letting new build homes we will work with the relevant local authority to ensure that we comply with any planning agreements in place, such as s.106 agreement

17. Sensitive Lettings

In order to ensure a sustainable tenancy for the applicant, or to prevent potential housing management issues that may result from an unsuitable match, we may apply a sensitive letting. This means that we may depart from our usual allocation practice and instead of allocating a property to applicants in order of their priority (based on housing need), we will consider the suitability of the applicant for the property on the basis of the information we have about them.

In order to achieve communities which are balanced, safe, and sustainable we may implement a sensitive lettings criterion on individual properties and/or areas.

For example, this could be the case where there is previous age-designated stock or where there have been issues relating to anti-social behaviour or community cohesion.

In all cases, any such use of sensitive let criteria will be advertised in the CBL advert. When in force this may result in offers of accommodation being made to the most suitable applicant on the shortlist regardless of their position.

18. Management Transfers

There may be exceptional circumstances where a tenant needs to be moved as a matter of urgency or priority, either to maintain balanced and stable communities, to protect vulnerable tenants (including cases of harassment or domestic abuse) or tenants who have lost their home due to fire, flood etc. In addition, there may be instances where an urgent move is required for technical reasons, for example, major structural repairs, damp, asbestos etc.

The applicant should be placed into the appropriate priority band and would usually be expected to place bids on suitable properties as they are advertised. Where the applicant is placed in a priority band for a management transfer but is either unable or unwilling to place bids themselves, or the need for rehousing is urgent and immediate, a Direct Let or Match may be considered.

Applicants who would otherwise be offered a temporary decant for works, such as damp works, may be offered an alternative “like for like” move, a “permanent decant”, in order to reduce the overall cost for LHP.

19. Lettings to employees and their close relatives

Applicants for housing are asked to declare if they are related to a LHP staff, Board or Committee member. Any letting to an existing employee or their close relatives (for example spouse, civil partner, child, brother, sister, parent, parent-in-law, grandparent, grandchild, guardian, adoptive parent, adopted child) must be approved in advance by the Chief Executive in order to ensure the probity of the let.

20. Excluding Applicants

a. Former tenant debts

Where a former tenant has applied for rehousing and has outstanding housing related debt with LHP, if they are below the £500 threshold for the appropriate cbl scheme and are active on the housing register we may agree to rehouse them and write the debts in to the new tenancy agreement. The factors which will be considered include.

- how long ago the debt was accrued, and the rent payment behaviour since it

- was accrued.
- the total amount of debt
- the cause of the debt e.g., whether the customer chose not to pay, was unable to, whether the rent charged was affordable, or whether welfare reforms contributed.
- whether a repayment plan had been agreed or a possession order and if the customer complied with it.
- Whether the customer's circumstances have changed significantly.

Debts owing to other housing providers/landlords

All housing related debts accrued and still owing are to be considered. LHP will take into account the amount and type of the debt, the circumstances under which it accrued and the applicant's payment record.

All applicants must be asked to clear any debts owed to their current landlord in full. If this is not possible, they must be advised that their application cannot be considered until they demonstrate a commitment to pay regularly for a period of at least six months.

If we fail to get any details of previous debts from private landlords, we must take this to mean that no debts exist.

b. Antisocial Behaviour

If there is evidence that the applicant/member of the household has acted and/or been identified as perpetrating antisocial behaviour which makes them unsuitable to be a customer in the property, they have applied for the application may be refused. This will only be in the circumstances where the nature and severity of the antisocial behaviour is a serious threat to LHP staff, contractors, customers, or the community.

Consideration will be given to how long ago the incidents occurred, whether there were factors involved which related to the previous address and how the individual has conducted themselves since and whether the customers circumstances have changed significantly.

c. Criminal Behaviour

If an applicant/member of the household has been convicted of a "serious offence" that is unspent, and they may pose a treat/risk to our staff, customers, contractors, or the community the application may be refused.

Examples of "serious offences" include:

- Public Order offences, nuisance, vandalism, breach of injunction
- Dealing, supplying, or cultivating controlled drugs
- Burglary, robbery, theft

- Violence
- Indictable offences
- Offences relating to hate crimes

Consideration will be given to how long ago the incidents occurred, whether there were factors involved which related to the previous address, and how the individual has conducted themselves since the conviction.

d. Unmet Support Needs

Applicants with unmet support needs, where LHP are unable to identify suitable and sufficient support through a third-party agency may be refused a tenancy. LHP will always aim to work with partner agencies to find appropriate support to enable an allocation to be made.

e. False Information

If an applicant is found to have deliberately provided false information that is relevant to a housing application, or has deliberately withheld information, which has resulted in improved chances of being offered a home the applicant may be refused an offer of accommodation.

f. Tenancy Breaches

Applicants may be refused where there is evidence that the applicant/member of the household has seriously breached a tenancy agreement or has behaved in a way that would constitute a breach of tenancy conditions, The breach will be considered if it would be reasonable for a court to grant a possession order, or if it renders the applicant unsuitable to be a LHP customer.

Examples include:

- Malicious damage to property
- Unwilling to comply with any imposed conditions of tenancy

g. Other Reasons for Refusal

An applicant may also be refused an offer of accommodation if:

- The property applied for is unsuitable to the applicants needs and by offering the property would cause overcrowding.
- The applicant is a person from abroad prescribed as ineligible by the Secretary of State.

h. Appeals

The relevant cbl policy for each local authority area provides information on the review

and appeal mechanisms available to applicants.

If an applicant is unhappy with a decision made by LHP to refuse housing, then a complaint may be submitted, which will be investigated and responded to in line with the LHP Complaints Policy.

21. Implementation, Monitoring and Performance

- a) The Corporate Head of Customers is responsible for implementing and monitoring performance of this policy.
- b) The Corporate Head of Customers will monitor the following:
 - The number of properties empty and available for let
 - The average relet time for empty properties
 - The number of lets achieved
 - The numbers being rehoused through each scheme, by priority band
 - The numbers being rehoused through each scheme who are current tenants (transfers)
 - The number of refusals and reasons
 - No of lettings to Armed Forces applicants
 - The number of lettings by diversity of applicants
 - The number of refusals by diversity of applicants
- c) The Performance Team will monitor satisfaction with the lettings process.



Equality Impact Assessment Initial Screening

Name of policy / strategy / project (the" initiative"):

Lettings Policy

Provide a brief summary of the aims and main activities of the initiative: (bullet points)

The policy sets out the approach that LHP will take, working within the CBL schemes it currently participates in (for the North HomeChoice Lincs and for the East Lindsey and Boston Joint Housing Register), to effectively market and let our homes to suitable applicants, in a fair open and transparent way.

Completed by: Mark Coupland

Date: 17 January 2022

STAGE 1: SCREENING

This stage establishes whether a proposed initiative will have an impact from an equality perspective on any particular group of people or community – i.e., on the grounds of race, religion/faith/belief, gender (including transgender), sexual orientation, age, disability, or whether it is "equality neutral" (i.e., have no effect either positive or negative).

Q 1. Who will benefit from this initiative? Is there likely to be a positive impact on specific groups/communities (whether they are the intended beneficiaries), and if so, how? Or is it clear at this stage that it will be equality 'neutral' i.e. will have no particular effect on any group? *Please consider all aspects of Diversity including as a minimum: Age, Disability, Gender/Transgender, Race/Ethnicity, Religion/Faith/Belief, Sexuality*

The Policy potentially benefits all housing applicants equally.

Q 2. Is there likely to be an adverse impact on one or more minority/under-represented or community group as a result of this initiative? If so, who may be affected and why: Or is it clear at this stage that it will be equality 'neutral'? Please consider all aspects of Diversity including as a minimum: Age, Disability, Gender/Transgender, Race/Ethnicity, Religion/Faith/Belief, Sexuality

Not as a direct result of the policy, however, we know that we have a shortfall of suitably adapted homes held within our current stock. However, the policy seeks to clarify our stances in terms of who we will let our properties to in order to make the best use of the limited amount of fully or partially adapted property that we hold.

Q 3. Is there sufficient data on the target beneficiary groups/communities? Are any of these groups under or over represented? Do they have access to the same resources? What are your sources of data and are there any gaps? Please consider all aspects of Diversity including as a minimum: Age, Disability, Gender/Transgender, Race/Ethnicity, Religion/Faith/Belief, Sexuality

The policy is neutral in that it does not discriminate between the various groups or communities.

Q 4. Outsourced services – if the initiative is partly or wholly provided by external organisations / agencies, please list any arrangements you plan to ensure that they promote equality and diversity. Please consider all aspects of Diversity including as a minimum: Age, Disability, Gender/Transgender, Race/Ethnicity, Religion/Faith/Belief, Sexuality

The policy is implemented and monitored internally.

Q 5. Is the impact of the initiative (whether positive or negative) significant enough to warrant a full impact assessment – see guidance? If not, will there be monitoring and review to assess the level of impact over a period of time? Please consider all aspects of Diversity including as a minimum: Age, Disability, Gender/Transgender, Race/Ethnicity, Religion/Faith/Belief, Sexuality

No – we will continue to work with our partners through our development programme to bring more suitably adapted properties in to our stock, and we continue to work with partners in local authority and the Occupational Therapy service to carry out adaptations to currently tenanted properties where this is the preferred option.

Q 6. To be completed at six monthly review Detail actions taken to assess the level of impact over a period of time, or to address any gaps in data.
Please consider all aspect of Diversity including as a minimum: Age, Disability, Gender/Transgender, Race/Ethnicity, Religion/Faith/Belief, Sexuality

This will be picked up as part of the periodic review of the policy.

Guidelines: Things to consider

- Where a negative (i.e. adverse) impact is identified, it may be appropriate to make a full EIA (see Stage 2), or, as important, take early action to redress this – e.g. by abandoning or modifying the initiative. NB If the initiative contravenes equality legislation; it must be abandoned or modified.
 - Where an initiative has a positive impact on groups/community relations, the EIA should make this explicit, to enable the outcomes to be monitored over its lifespan.
 - Where there is a positive impact on particular groups, does this mean there could be an adverse impact on others, and if so can this be justified? - e.g. Are there other existing or planned initiatives which redress this?
 - It may not be possible to provide detailed answers to some of these questions at the start of the initiative. The EIA may identify a lack of relevant data, and that data-gathering is a specific action required to inform the initiative as it develops, and also to form part of a continuing evaluation and review process.
 - It is envisaged that it will be rare for full impact assessments to be required. Usually, where there are particular problems identified in the screening stage, it is envisaged that changing the approach at this stage, and/or setting up a monitoring/evaluation system to review a policy's impact over time will tackle the problem.
-