

Norfolk County Council

Record of Individual Cabinet Member Decision

Responsible Cabinet Member: Cllr Fisher Cabinet Member for Children's Services)

Background and Purpose:

Child L is 9 years old. She is fostered by two parent foster family and has lived with this family since birth. Child L is on a Full Care Order; therefore, the Local Authority is Child L's Corporate Parent.

Child L has complex health needs arising from a severe physical and learning disability. The current foster placement cannot be provided safely. Increasingly the home environment is not safe for Child L. A number of risks are present to Child L and her carers in the current situation. The placement is at risk of imminent breakdown. There are not any realistic alternate family-based care and adaptations cannot be made to the house whilst the foster carers remain tenants.

The landlord has stated he is willing to sell to the foster carers, but the foster carers, due to their caring duties, and whilst adaptations cannot be made to the home, are unable to secure a commercial mortgage.

If they were able to own the property, adaptations could be made that would allow the house to be safe for Child L and allow the carers to return to work and thus be able to secure a commercial mortgage in the future. This would allow them to repay the proposed loan.

Decision: As detailed in the attached report

Is it a key decision? No

Is it subject to call-in? Yes

If Yes – the deadline for call-in is: 4pm, Thursday 10 February 2022

Impact of the Decision:

This proposed approach will allow Child L to remain cared for by the foster parents within the family that she has lived with since birth and maintain contact with her birth family. It incorporates a plan to allow the family back to economic stability whilst having a clear position on repayment of the loan whilst also positively influencing placement sufficiency for the local authority.

Evidence and reason for the decision:

Supporting the foster carers to secure a permanent home that would enable them to continue to care for Child L in her childhood and through adulthood. This would allow the Child L to remain with the family who has brought her up since birth and who desperately wish to continue for her to be in their family.

Alternate options have been explored including alternate accommodation, but ruled out as clearly not being in the best interests of L and also likely to incur greater cost, leaving this option as the most cost-effective solution, as well as providing good outcomes for Child L now and into her future.

Alternative options considered and rejected:

We have explored the option of seeking an alternative placement for Child L, within both foster or residential provision. As Child L is young, it is not good practice to separate someone with such strong bonds from their main carers, but the options for alternative placements would be:

- it would be highly unlikely, though not necessarily impossible, to find an alternative foster carer that could meet Child L's needs with suitable housing, though the move from her foster family that she has been with since birth would be likely to be a traumatic event that may have significant impact upon Child L's outcomes as you might expect of any child being removed from their parent (as she considers them).
- a residential placement could be sought, but this would be significantly in excess of the cost of Child L's current provision, although it is not directly comparable to the cost of foster care and would have at least the same negative impact as the option above.
- Providing the foster family with money for a deposit: due to the current care demands of Child L, there is a requirement for two carers to meet her needs whilst adaptations are awaited, this means that the foster father is unable to work his normal hours and so they are unable to secure a commercial mortgage at this stage, even with a deposit provided.
- NCC purchasing a suitable property (current or alternative) for the foster family that is then rented to them whilst they care for Child L: this option would allow for rent to be set at an affordable level for the family, providing security of tenancy whilst also ensuring that any cost of capital / borrowing is covered, as a minimum, rather than the cost of repaying the capital itself. However, NCC are unable to offer residential leases and so would need to engage a third party to do this, incurring additional expense for NCC. Additionally, work would be required as landlord to bring the property up to the required standard,

which would incur more capital expenditure for NCC. For NCC, resources would be protected through ownership of the asset, allowing the investment to be recoverable at an appropriate time, although it is not clear when that appropriate time would be. NCC would not normally provide housing for foster carers.

- NCC guaranteeing a commercial mortgage: this option would enable NCC to not expend any capital immediately and, potentially, not at all. However, it would require a commercial lender to be willing to have NCC as guarantor and the process is likely to incur additional costs to make the arrangements. Additionally, it might prove difficult to remove NCC as guarantor at a future point, meaning that there is no clear end-date or exit plan to the arrangement, even once adaptations are done and the foster father is able to return to his full-time employment and income.

Child L's health needs are significant and require the adaptations to the property to allow the foster carers to safely care for her. Whilst housing is not a responsibility of health, agreements are in place with health colleagues as to contributions that they can make to enable Child L to remain within her current foster family. Health have agreed joint funding of any adaptations over the Disabled Facilities Grant and will contribute to the care package elements that relate to health need.

Financial, Resource or other implications considered:

The purpose of this proposal is to meet the needs of Child L and enable good outcomes to be achieved without exposing either NCC or her foster family to unreasonable levels of financial risk and whilst being good stewards of taxpayers' money, as required for all children who are looked after.

Alternate options would cost more than this proposal whilst also being significantly detrimental to the child's health and wellbeing.

There is a financial risk in the position of default, but this would very largely be covered by the protection offered by the charge on the property.

Resource implications are limited to the staff and legal costs of making these arrangements.

Record of any conflict of interest: N/A

Background documents:

- N/A
-

Date of Decision: 2/2/22

Publication Date of Decision: 3/2/22

Signed by Cabinet Member:

I confirm that I have made the decision set out above, for the reasons also set out.



Print name: Cllr. John Fisher

Date: 02.02.22

Accompanying documents:

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Once you have completed your internal department clearance process and obtained agreement of the Cabinet Member, send your completed decision notice together with the report and green form to committees@norfolk.gov.uk

Individual Cabinet Member Decision Report

Item No:

Report Title: Capital borrowing for provision of loan for purchase of property.

Date of Meeting: N/A

Responsible Cabinet Member: Cllr Fisher (Cabinet Member for Children's Services)

Responsible Director: Sara Tough (Executive Director for Children's Services)

Is this a Key Decision? No

If this is a Key Decision, date added to the Forward Plan of Key Decisions: N/A

Executive Summary / Introduction from Cabinet Member

Child L is 9 years old and she is fostered by two parent foster family and has lived with this family since birth. Child L has complex health needs and the current foster placement cannot be provided safely due to a number of risks are present to Child L and her carers in the current situation.

This proposal is specifically in relation to NCC offering a secure loan to the foster family to enable them to enter negotiations with the landlord about purchasing the property to secure the long-term home for Child L. The foster family will then pay back the loan to NCC with interest, through a private mortgage arrangement, until such time as the family are able to access a commercial mortgage. This will enable the care to continue.

Recommendations:

- 1. Agree to providing a loan to foster carers to enable them to purchase the rented property in which they live. The loan will be secured against the property with a legal charge and subject to a private mortgage with interest payments at a commercial rate and covering NCC's cost of borrowing. The purchase is required to**

prevent the breakdown of a long- term foster care arrangement due to the property being sold.

- 2. Agree to additional capital borrowing to fund the loan**
- 3. Delegate to the Executive Director of Childrens Services to finalise the amount of the loan and the details of the security for the loan.**

1. Background and Purpose

- 1.1 Child L is 9 years old. She is fostered by two parent foster family and has lived with this family since birth. The foster family is provided through an Independent Fostering Agency. The family live in West Norfolk, in a house that is privately rented. Child L is on a Full Care Order; therefore, the Local Authority is Child L's Corporate Parent.
- 1.2 Child L has complex health needs arising from a severe physical and learning disability, including complex epilepsy which can complicate the requirements of delivering care. Health services support this placement by providing the community-based health services, the advice of a specialist epilepsy nurse as well as overnight residential breaks in a nursing led unit.
- 1.3 The current foster placement cannot be provided safely. Increasingly the home environment is not safe for Child L. A number of risks are present to Child L and her carers in the current situation. If we cannot find a resolution to the risks, the IFA (Independent Fostering Agency) are stating that they cannot support this foster placement as they do not consider it safe. The placement is at risk of imminent breakdown.
- 1.4 Realistically we will struggle to place Child L with alternative foster carers, due to the specialist environment she requires. Child L has an assessed clinical need for a property with level access. Assessments undertaken by the Norfolk County Council Occupational Therapy advise that Child L needs a bedroom and wet room on the same floor as her carers, on the ground floor. An exploration of the local area to see if such accommodation is coming on the market, has been undertaken, and no houses have these rooms on the ground floor and the capacity to house a family of this size.
- 1.5 The Occupational Therapist feels there is a feasible plan for adaptations to the current house to provide ground floor facilities if the property owner is willing to sell. The landlord has indicated he is not willing for necessary works to be completed while the family are tenants.
- 1.6 The specific aids and adaptations relating to Child L are also likely to come in costed above that available through the Disabled Facilities Grant. This

expenditure would need to be considered in any planning and any additional funds are agreed to be met through existing funding streams.

- 1.7 The current landlord has now indicated that given the current buoyant market he intends to market the property for sale, although is willing to sell to the foster family if progress can be made promptly.
- 1.8 If the family are unable to live in the property with the required adaptations, then there is a high chance that they would no longer be able to care for Child L and alternative care would need to be found. This would be expected to have a significant detrimental effect upon Child L's outcomes, but it is unlikely that an alternative foster placement could be found and residential care would normally be significantly more expensive and may well be out of county which would likely adversely affect contact with Child L's birth family, with whom a strong relationship is maintained.
- 1.9 The foster carers have been refused a commercial mortgage as the care currently needed due to the property limitations requires two carers, meaning that the foster father can only work intermittently. Once adaptations are completed, he should be able to return to regular work and access a commercial mortgage as soon as possible.

2. Proposal

- 2.1 NCC secure a loan for the family for them to enter negotiations with the landlord about purchasing the property. The foster family will then pay back the loan to NCC with interest, through a private mortgage arrangement, until such time as the family are able to access a commercial mortgage. This will enable the care to continue.
- 2.2 This proposal is specifically in relation to the purchase of the property from the landlord to secure the long-term home for Child L. However, it should be noted that the adaptations would still be required; these would normally be the concern of the relevant local authorities (district and county) and health partners where the need arises due to the child's disabilities. Therefore, the funding for adaptations is not the subject of this decision and the normal decision-making approach in such circumstances will be undertaken.

3. Impact of the Proposal

- 3.1 This proposed approach will allow Child L to remain cared for by the foster parents within the family that she has lived with since birth. It will also enable Child L to maintain and continue to enable her relationship with her birth mother.

- 3.2 The foster father will be able to return to full time employment due to Child L's needs being able to be met by her foster mum.
- 3.3 The foster family will have stability and increased security of tenure. It would be detrimental to our sufficiency provision, which is already critically stretched due to the ongoing impact of the pandemic and other pressures within the marketplace, to lose this provision.

4. Evidence and Reasons for Decision

- 4.1 Finding the right type of housing to place a child with Child L's needs will be hard, due to specific requirements.
- 4.2 Finding an alternative family in the current environment would be exceptionally hard as there is a local and nationwide shortage of sufficiency for placements for such high-level children and they may well not live in a suitable housing to meet Child L's needs, even if they were able to care for her.
- 4.3 Child L has lived with this family since her birth; moving her would significantly disturb her attachment to those whom she considers her family and a move to an alternative living arrangement with another family could cause an emotional and traumatic event for Child L. Any change to the location of her home could be another traumatic event for her and would likely lead to a regression in her physical health. She would need to be transported significant distance across the County to continue at her existing school, thus incurring significant additional financial cost to the Council as well as increased travel to school being a poorer outcome for Child L.
- 4.4 The other alternative is to consider residential accommodation for Child L. Child L is young and it is not good practice to separate someone with such strong bonds from their main carers. The nearest residential facility that could meet her needs is in Hertfordshire and this would be dependent on a place being available. This would also mean moving Child L away from a school where she is settled.
- 4.5 It is the foster family's intention to care for the child into adulthood, as she is part of their family. It is expected that the current Care Act would mean that Adults Social Care would be responsible for supporting her needs to be met. Alternative provision in adulthood might be residential care (particularly if she has been in residential care as child) or supported living, which are both likely to be more costly than if she was supported to remain living within the foster family. Thus, this proposal potentially mitigates significant additional costs in her later life.

- 4.6 Therefore, supporting the foster carers to secure a permanent home that would enable them to continue to care for Child L as a child and young person, whilst also enabling them to be able to continue to meet her needs as an adult and for her to remain within the family, is a cost-effective solution, as well as providing good outcomes for Child L now and into her future.

5. Alternative Options

- 5.1 A number of alternative options have been explored, some of which have been referenced in the context or proposal sections above.

- 5.1.1 Seeking an alternative placement for Child L, foster or residential. As Child L is young, it is not good practice to separate someone with such strong bonds from their main carers, but the options for alternative placements would be:

- it would be highly unlikely, though not necessarily impossible, to find an alternative foster carer that could meet Child L's needs with suitable housing, though the move from her foster family that she has been with since birth would be likely to be a traumatic event that may have significant impact upon Child L's outcomes.
- a residential placement could be sought, but this would be significantly in excess of the cost of Child L's current provision, although it is not directly comparable to the cost of foster care.

- 5.1.2 Providing the foster family with money for a deposit: due to the current care demands of Child L, there is a requirement for two carers to meet her needs whilst adaptations are awaited, this means that the foster father is unable to work his normal hours and so they are unable to secure a commercial mortgage at this stage, even with a deposit provided.

- 5.1.3 NCC purchasing a suitable property (current or alternative) for the foster family that is then rented to them whilst they care for Child L: this option would allow for rent to be set at an affordable level for the family, providing security of tenancy whilst also ensuring that any cost of capital / borrowing is covered, as a minimum, rather than the cost of repaying the capital itself. However, NCC are unable to offer residential leases and so would need to engage a third party to do this, incurring additional expense for NCC. Additionally, work would be required as landlord to bring the property up to the required standard, which would incur more capital expenditure for NCC. For NCC, resources would be protected through ownership of the asset, allowing the investment to be recoverable at an

appropriate time, although it is not clear when that appropriate time would be. NCC would not normally provide housing for foster carers.

5.1.4 NCC guaranteeing a commercial mortgage: this option would enable NCC to not expend any capital immediately and, potentially, not at all. However, it would require a commercial lender to be willing to have NCC as guarantor and the process is likely to incur additional costs to make the arrangements. Additionally, it might prove difficult to remove NCC as guarantor at a future point, meaning that there is no clear end-date or exit plan to the arrangement, even once adaptations are done and the foster father is able to return to his full-time employment and income.

5.2 Child L's health needs are significant and require the adaptations to the property to allow the foster carers to safely care for her. Whilst housing is not a responsibility of health, agreements are in place with health colleagues as to contributions that they can make to enable Child L to remain within her current foster family. Health have agreed joint funding of any adaptations over the Disabled Facilities Grant and will contribute to the care package elements that relate to health need.

6. Financial Implications

- 6.1 The purpose of this proposal is to meet the needs of Child L and enable good outcomes for her to be achieved without exposing either NCC or her foster family to unreasonable levels of financial risk and whilst being good stewards of taxpayers' money, as required for all children who are looked after.
- 6.2 The foster family have agreed that they would enter into a private mortgage arrangement with a repayment rate that includes repayment of the capital and a commercial interest rate that would appropriately cover NCC's costs of borrowing, including administration.
- 6.3 As well as the purchase price, and purchasing costs, of the property, there are adaptations required to enable the property to meet Child L's needs that are likely to exceed the current cap on the Disabled Facilities Grant. This will be additional expenditure c. £20,000 which will be met jointly with health.
- 6.4 The relevant sections from the NCC's Financial Regulations are noted below:

"5.11.5 The Executive Director of Finance and Commercial Services has discretion to consider making a short-term loan in the above circumstances, whilst also considering: the ability of the loan recipient to repay and the provision of a robust plan to demonstrate how the situation which gave rise to the need for a loan will be resolved (it is also likely that a Financial

Assessment of the recipient will be required); any potential subsidy issues, particularly in respect of determining an appropriate interest rate for the loan, which should be set with reference to the published margin tables; and the duration and value of the loan sought.

5.11.6 Loans will be requested through the relevant Finance Business Partner for the service area, in consultation with the Executive Director for the service. Loans will not be made until they have been approved by the Executive Director of Finance and Commercial Services, or the Director of Financial Management, following consultation with the Leader and / or Deputy Leader in the case of a loan over £50,000 and / or for a loan period in excess of six months.

5.11.7 Loans may be repaid either by instalment or as a lump-sum. The terms of the loan, including arrangements for repayment, must be agreed and a loan agreement signed by both parties before any loan can be made. The service area initiating the loan will be required to identify a cost centre which will bear the cost of the loan in the event of a failure by the loan recipient to make repayments as agreed. The Executive Director for the service should consider the need to make the relevant Cabinet Member(s), Leader and / or Deputy Leader aware of this potential cost to the service budget."

7. Resource Implications

- 7.1 **Staff:** None
- 7.2 **Property:** Charge on property in PE3* ***
- 7.3 **IT:** None

8. Other Implications

8.1 Legal Implications:

The loan arrangement will be secured against the property and a private mortgage arrangement with a commercial rate of interest will be agreed with the family prior to the purchase of the property.

The authority for the Council to enter into this arrangement is found in the Localism Act 2011

8.2 Human Rights Implications: None

8.3 Equality Impact Assessment (EqIA) (this must be included): see appendix

8.4 Data Protection Impact Assessments (DPIA): N/A

8.5 Health and Safety implications (where appropriate): Having a long-term, appropriately adapted home will mitigate health and safety risks of both the foster carers and Child L. The current position is deteriorating due to the increasing needs of Child L and the purchase of the property is necessary to allow the undertaking of adaptations to the property and maintain Child L's health, wellbeing and safety.

8.6 Sustainability implications (where appropriate): N/A

8.7 Any Other Implications: N/A

9. Risk Implications / Assessment

9.1 There is a financial risk to NCC that the foster carers do not repay the loan. This is protected by security against the property and a mortgage agreement

9.2 We have undertaken assessment of affordability for the carers and the existing position is acceptable and further mitigations will further improve this position. Due to Child L's needs at the moment, and until the adaptations are completed, the foster father is unable to undertake his normal work. However, once the property is adapted, he would be able to return to his normal workload and the family's income will be restored to its previous levels. The income and expenditure assessment completed with the family indicates that the repayments are in line with the current rental payments which have remained affordable for the family. There is always a risk that the family's income could reduce in future, and this could impact on affordability.

9.3 Given the arrangement that they are looking to enter into, it is important that the foster carers seek appropriate, independent legal and financial advice to ensure that they understand the commitment that they are making and the implications for themselves and their family if repayments are not fully met. Children's Social Care will support them to access this advice.

9.4 It is likely that once the adaptations are completed, the foster father is able to return to regular work and thereby prove to a prospective mortgage company

their joint regular income, that they will be able to take on the mortgage on their own and thus end this proposed arrangement.

10. Recommendations

- 1. Agree to providing a loan to the foster carers to enable them to purchase the rented property in which they live. The loan will be secured against the property with a legal charge and subject to a private mortgage with interest payments covering NCC's cost of borrowing. The purchase is required to prevent the breakdown of a long term foster care arrangement due to the property being sold.**
- 2. Agree to additional capital borrowing to fund the loan**
- 3. Delegate to the Executive Director of Childrens Services to finalise the amount of the loan and the details of the security for the loan.**

Officer Contact

If you have any questions about matters contained within this paper, please get in touch with:

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[Capital borrowing for provision of loan for purchase of property.]

Equality Impact Assessment – Findings and Recommendations

[01/12/2021]

[Daniel Newbolt – Assistant Director Children’s Social Care]

Equality impact assessments enable decision-makers to consider the impact of proposals on people with protected characteristics.

You can update an assessment at any time to inform service planning and commissioning. For help or information please contact equalities@norfolk.gov.uk

1. The proposal

Capital borrowing for provision of loan for purchase of property.

Summarise here the purpose and aims of your proposal

Agree to providing a loan to the foster carers to enable them to purchase the property, which is secured to the property with a legal charge and subject to interest payments covering NCC's cost of borrowing

Agree to additional capital borrowing to fund the loan.

This is to enable L, age 9, who has significant disabilities to continue living within the care of her foster placement whom she has been with since birth.

1. Legal context

- 1.1 Public authorities are required by the Equality Act 2010 to give due regard to equality when exercising public functions¹. This is called the 'Public Sector Equality Duty'.
- 1.2 The purpose of an equality impact assessment is to consider the potential impact of a proposed change or issue on people with protected characteristics (see Annex 1 for information about the different protected characteristics).
- 1.3 If the assessment identifies any detrimental impact, this enables mitigating actions to be developed.
- 1.4 It is not always possible to adopt the course of action that will best promote the interests of people with protected characteristics. However, equality assessments enable informed decisions to be made that take every opportunity to minimise disadvantage.

2. Information about the people affected by the proposal

This proposal will primarily impact on one service user, a disabled child (LML) and their existing foster carers.

3. Potential impact

- 3.1 Based on the evidence available, this proposal is likely to have a positive impact on the one affected person with protected characteristics.
- 3.2 This is because without the proposal being successful, it is probable that the family will no longer be able to care for the child due to the property likely being sold by the landlord. As a disabled child, placement options are much more limited, in an existing limited care market and any move would likely take time and cause physical health regression in a child who is at risk of dying due to her disability needs.

The purchase of the property maintains the existing position for the child and creates stability and for her needs to continue to be met by the family she has been since birth.

- 3.3 There is no legal impediment to going ahead with the proposal. It would be implemented in full accordance with due process, national guidance and policy. Similar proposals have been implemented elsewhere in the UK.

- 3.4 It is possible to conclude that the proposal may have a positive impact on some people with protected characteristics, for the reasons set out in this assessment. It may also have some detrimental impacts, also set out in the assessment.
- 3.5 Decision-makers are therefore advised to take these impacts into account when deciding whether or not the proposal should go ahead, in addition to the mitigating actions recommended below.
- 3.6 Some of the actions will address the potential detrimental impacts identified in this assessment, but it is not possible to address all the potential impacts. Ultimately, the task for decision-makers is to balance these impacts alongside the need to manage reduced resources and continue to target support at those who need it most.

4. Recommended actions

If your assessment has identified any detrimental impacts, set out here any actions that will help to mitigate them.

Number	Action	Lead	Date
1.	N/A		
2.			
3.			


5. Evidence used to inform this assessment

I have particularly considered the

- [Equality, Diversity and Inclusion Policy](#)
- Demographic factors set out in [Norfolk's Story 2021](#)
- Norfolk County Council [Area Reports](#) on Norfolk's JSNA relating to protected characteristics
- Equality Act 2010 and Public Sector Equality Duty codes of practice

6. Further information

For further information about this equality impact assessment please contact **[insert job title and contact details of relevant member of staff]**

	<p>If you need this document in large print, audio, Braille, alternative format or in a different language please contact xxx on xxx or xxx (Text relay)</p>
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Annex 1 – table of protected characteristics

The following table sets out details of each protected characteristic. Remember that people with multiple characteristics may face the most barriers:

Characteristic	Who this covers
Age	Adults and children etc, or specific/different age groups
Disability	<p>A person has a disability if they have a physical or mental impairment which has a substantial and long-term adverse effect on their ability to carry out normal day-to-day activities.</p> <p>This may include but is not limited to:</p> <ul style="list-style-type: none"> • People with mobility issues (eg wheelchair or cane users, people of short stature, people who do not have mobility in a limb etc) • Blind and partially sighted people • People who are D/deaf or hearing impaired • People with learning disabilities • People who have mental health issues • People who identify as neurodiverse (this refers to neurological differences including, for example, dyspraxia, dyslexia, Attention Deficit Hyperactivity Disorder, the autistic spectrum and others) • People with some long-term health conditions which meet the criteria of a disability.
People with a long-term health condition	People with long-term health conditions which meet the criteria of a disability.
Gender reassignment	<p>People who identify as transgender (defined as someone who is proposing to undergo, is undergoing, or has undergone a process or part of a process to reassign their sex. It is not necessary for the person to be under medical supervision or undergoing surgery).</p> <p>You may want to consider the needs of people who identify as non-binary (a spectrum of gender identities that are not exclusively masculine or feminine).</p>
Marriage/civil partnerships	People who are married or in a civil partnership. They may be of the opposite or same sex.
Pregnancy and maternity	Maternity refers to the period after birth and is linked to maternity leave in the employment context. In the non-work context, protection against maternity discrimination

Characteristic	Who this covers
	is for 26 weeks after giving birth, and this includes treating a woman unfavourably because she is breastfeeding.
Race	<p>Race refers to a group of people defined by their race, colour, or nationality (including citizenship) ethnic or national origins.</p> <p>A racial group can be made up of two or more distinct racial groups, for example a person may identify as Black British, British Asian, British Sikh, British Jew, Romany Gypsy or Irish Traveller.</p>
Religion/belief	<p>Belief means any religious or philosophical belief or no belief. To be protected, a belief must satisfy various criteria, including that it is a weighty and substantial aspect of human life and behaviour. Denominations or sects within a religion can be considered a protected religion or religious belief.</p>
Sex	<p>This covers men and women. Also consider the needs of people who identify as intersex (people who have variations in sex characteristics) and non-binary (a spectrum of gender identities that are not exclusively masculine or feminine).</p>
Sexual orientation	<p>People who identify as straight/heterosexual, lesbian, gay or bisexual.</p>

Document review

Reviewed and updated:	Reviewer
October and November 2016	Corporate Planning & Partnerships Manager
December 2017	Equality & Diversity Manager
October 2018	Equality & Diversity Manager
May and November 2019	Equality & Diversity Manager
May and November 2020	Equality & Diversity Manager
June and September 2021	Head of Equality, Diversity and Inclusion

¹ The Act states that public bodies must pay due regard to the need to:

- Eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under the Act;
- Advance equality of opportunity between people who share a relevant protected characteristic¹ and people who do not share it;
- Foster good relations between people who share a relevant protected characteristic and people who do not share it.

[The full Equality Act 2021 is available on legislation.gov.uk.](https://www.legislation.gov.uk)