

Equality and Safety Impact Assessment

The **public sector Equality Duty** (Section 149 of the Equality Act) requires public bodies to have due regard to the need to eliminate discrimination, advance equality of opportunity, and foster good relations between different people carrying out their activities.

The Equality Duty supports good decision making – it encourages public bodies to be more efficient and effective by understanding how different people will be affected by their activities, so that their policies and services are appropriate and accessible to all and meet different people’s needs. The Council’s Equality and Safety Impact Assessment (ESIA) includes an assessment of the community safety impact assessment to comply with section 17 of the Crime and Disorder Act and will enable the council to better understand the potential impact of the budget proposals and consider mitigating action.

<p>Name or Brief Description of Proposal</p>	<p><u>Library Transformation Project : EIA Mobile Library</u></p> <p>The aim of the Library Transformation project is to transform Southampton’s Library Service into a comprehensive, improved and sustainable service which meets the changing needs of the Southampton Community.</p> <p>The proposal for consultation is for the City Council to continue to manage a number of libraries whilst also seeking to explore the management of remaining libraries by community lead initiatives. Any libraries which would not continue to be managed by the City Council or by community lead initiatives would be available for disposal.</p> <p>The Mobile Library would be one of a number of libraries which it is proposed would not remain under the management of the City Council. The proposal has been determined by a needs assessment using both local demographic data and library user information and linked to the overall needs assessment (refer to Needs Assessment 2014 Appendix 2)</p> <p>The options available for Mobile Library under this proposal include:</p> <ul style="list-style-type: none"> • Closure and disposal of vehicle. The disposal of the Mobile Library would have a net one off cost of £89,200 • Co-deliver with community organisation The ability to co-deliver with a community organisation would be restricted by the ability to transfer the lease/loan of the current vehicle and any existing SLAs with the City’s Transport department to another organisation. The need for any driver to hold a C1 class licence and the requirement for any other parties wishing to operate the service to meeting specific Health and Safety requirements, e.g Driver Training would also have implications. <p>This process may take a considerable period of time and a major consultation is to be undertaken on these proposals so at this stage the EIA is a live document focussing on the proposed changes and any outcomes from consultation will be highlighted in this assessment</p>
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	and any subsequent Cabinet Report. All individual libraries not proposed to be retain in Council control have individual Equality Impact Assessments
<p>Brief Service Profile (including number of customers)</p>	<p>Southampton Library Service</p> <p>The Mobile Library is a 10.05m x 2.29m (33ft x 7ft6in) vehicle which operates across the City. The service is heavily targeted at sheltered homes, early years provision and in priority neighbourhoods.</p> <p>The Mobile Library has a lift providing good access to the vehicle. It has a small targeted collection of materials reflecting its use by specific groups namely under 5s and those who are 60+. The Mobile Library provides free and universal access to books and information.</p> <ul style="list-style-type: none"> • The Mobile Library currently operates for 33hrs a week. It has a 4 weekly timetable and serves 40 nurseries, 20 sheltered homes <p style="padding-left: 40px;">Mon - Thurs 9.30am-12noon & 1.30-6pm, Fri 9.45am-12noon & 1.30-3.50pm</p> <ul style="list-style-type: none"> • 432 Active Users – (total active users using each branch) • Visitor figures 2013-2014 = 11,185 • 35.6% of the Mobile Library active users are under 19. N.b. These figures do not give the overall picture of use by younger children. The Mobile Library registers the early years settings as users and not individual children. i.e. 1 library card per establishment • 50.9% of the Mobile Library active users are 60+ • The mobile library is heavily targeted at sheltered homes and early years provision which explains its high delivery rates at both ends of the age spectrum. • None of the Mobile Library customers who responded to the question about ethnicity in 2012 Library Satisfaction Survey (PLUS) described themselves as being of an ethnic group other than White British. • 40% of respondents from the Mobile Library in the 2012 Library satisfaction survey (PLUS) described themselves as having a disability. The Mobile Library had a high instance of people with disabilities but very few actual survey returns • The current Mobile Library service has been in operation since 3rd June 2013 as a result of the Mobile and the Booksplus services being amalgamated as part of budget savings for the year 2013-14.
<p>Summary of</p>	<ul style="list-style-type: none"> • A reduced geographical coverage of the SCC managed

<p>Impact and Issues</p>	<p>service physically across the city.</p> <ul style="list-style-type: none"> • Some reduced capacity within the SCC managed service to be able to play a role in supporting those with a literacy or digital literacy need • Potentially reduced number of peoples network points if the number of libraries reduce • Increased travel time and cost to reach a library from some parts of the city – for those who usually used the libraries not listed in this option if the number of libraries reduce • Potentially less use by some young people and hence a potential to have an impact on performance if the number of libraries reduce • The loss of a popular and well used community space for groups and agencies within the local area • Less space to promote events and activities in libraries if the number of libraries reduce • Some impact on those who use libraries i.e. City Limits, Quitters, job applicants, nursery and schools if the number of libraries reduce • Fewer venues means less places where people can get information if the number of libraries reduce • The exclusion of the Mobile library from any option loses the role it might play to mitigate the impact of any closures or changes to services resulting from community management • The disposal of the Mobile Library would have a net cost of £89,200 • The Mobile library and the Booksplus services were amalgamated as part of budget savings for the year 2013-14. As a result of these changes the current Mobile Library service has been in operation for just over a year since 3rd June 2013. There may be significant reaction by users to this proposal. • Significant adverse community reaction anticipated, Significant adverse staff reaction anticipated • The library service would not perform well potentially in the CIPFA performance tables if there was a reduction in opening hours and the number of libraries
<p>Potential Positive Impacts</p>	<ul style="list-style-type: none"> • The most effective libraries are retained by SCC • Moving towards community partnership offers an opportunity to maintain the service for the whole community and encourages local involvement and engagement. It offers further volunteering opportunities. • The opportunity for investment in IT stock and IT if budgets are retained to invest in the remainder of service. • Capital receipts from the sale of buildings if retained could be invested into the remainder of the service.
<p>Responsible Service Manager</p>	
<p>Date</p>	

Approved by Senior Manager	
Signature	
Date	

Potential Impact

Impact Assessment	Details of Impact	Possible Solutions & Mitigating Actions
Age	<p>The proposal that the Mobile Library would no longer be managed by SCC will reduce availability for all users but may have a disproportionate impact on the following identified groups. The Mobile library is heavily targeted at sheltered homes and early years provision.</p> <p>60+ This may have a greater impact on older users 60+. 50.9% of Mobile Library active users are 60+. This equates to 103 users these users may not be as mobile, tie their visits to shopping in particular locations or may not wish to visit after dark.</p> <p>Social isolation is an issue for many older people, particularly those who have lost a partner by 2025 it is estimated that there will be a 23% increase in people aged over 75 living alone. A reliance on local libraries as a source of social contact to relieve isolation is observed amongst older people</p> <p>Low income is an issue for many pensioners cost of travelling and carrying books greater distances may be an issue. Indicative figs show that 50% of active users who only use the Mobile Library are 60+</p> <p>Under 19s / (0-9)</p> <p>The percentage of 0-11 years old in the catchment has been included as a demographic indicator in determining needs/priorities for libraries which will continue to be managed by</p>	<p>Development of the Housebound Service to deliver materials to the least mobile older people staffed by volunteers. There is existing capacity and the potential to recruit further volunteers to serve more readers.</p> <p>Explore increasing the service to sheltered homes. The amount of materials and number establishments served could be increased.</p> <p>Explore increasing the number of book deposits at community venues across the City including nurseries, community centres, playgroups etc to mitigate the impact a potential reduction in libraries would have on these identified groups. There are implications of increased costs for materials and staff time associated with this.</p> <p>Concessionary bus passes are available for all individuals over pensionable age which may mitigate the cost of additional travel costs to access libraries.</p> <p>Library Opening hours consideration should be given to ensuring that opening hours of the libraries which will continue to be managed by SCC facilitate greater use by children and young people outside of school and college</p>

	<p>Southampton City Council</p> <p>The percentage of school pupils up to KS2 deemed low performers has been included as a demographic indicator in determining needs/priorities for libraries which will continue to be managed by Southampton City Council</p> <p>The proposal that the Mobile Library would no longer be managed by SCC would have a greater impact on children whose ability to access libraries is limited by attendance at nurseries, school and college to after school/ weekends in term time.</p> <p>The Mobile Library is a service targeted to early years provision with the vehicle visiting 40 nurseries over a 4 week rota. The proposal would mean children at these settings would no longer receive easy access to books and activities. Given the necessary restrictions e.g. number of staff to children ratios concerning children and off site visits and the different proposals to reduce the amount of libraries which would be managed by SCC, it could be very difficult for staff at these settings to organise monthly visits off site to a local library.</p> <p>35.6% of the Mobile Library active users are under 19. 17.8% of these being 0-9 years old. N.b. These figures do not give the overall picture of use by younger children. The Mobile Library registers the early years settings as users and not individual children. i.e. 1 library card per establishment</p> <p>Indicative figs show that 39.2% of active users who only use the Mobile Library are under 19. Those who use the Mobile Library would have greater distance to travel and the cost and safety implications of travelling on their own may impact on their use of libraries if this library were to no longer be managed by SCC.</p> <p>Southampton libraries reach more of the youngest people in the City as a group. Over 17% of 0-9 year olds in the City have borrowed something from a library or used a computer in a library in the year 13/14. 14.6% of 10-19 year olds have used a library in the year</p>	<p>SCC would seek to explore continuing running activities in SCC managed Libraries and to develop service level agreements in community run libraries around the delivery of activities such as rhyme and storytime, children's materials and library spaces, homework clubs, family learning and other educational reader development initiatives</p> <p>School Library Service is a traded service which schools choose to buy into current buy in of schools in Southampton is 85.7%. The service would continue to be provided to subscribing schools and is t is an element of the overall provision for school children which may provide some mitigation if libraries have to close, albeit term time only and only for children attending schools in the area which subscribe to this service. This service would have an important role in helping roll out the Universal Library membership of all Year R-KS3 City wide.</p> <p>Investment in IT utilising retained library IT budget would have the potential to provide better access to Library online services which would include; 24 hour online access to library catalogue, account management and information sources.</p> <p>The mitigation offered by better access to online services may be reduced amongst some age groups –digital literacy training needs and access to computers may be an issue for some older people and the very young.</p>
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	<p>13/14</p> <p>Activities for pre-school children in the form of storytimes and rhymetimes will reduce as the number of libraries which would continue to be managed by Southampton City Council reduces.</p> <p>Activities for older children in the form of School Holiday Activities, Reading Groups will reduce as the number of libraries which would continue to be managed by Southampton City Council reduces. This will reduce the number of free sessions available across the City where children and their carers can meet socially, engage with books and engage in activities which support their learning and development. A 4 weekly timetable of storytimes and book exchanges for pre school children is operated by the Mobile Library</p> <p>The targeted service provided by the Mobile Library currently has a disproportionate impact on people of working whose ability to access libraries is limited by their working day. The proposal to reduce the number of libraries managed by SCC would further impact this group as those whose local library would not continue to be managed by Southampton City Council may have to travel greater distance to access libraries which may further impact the on the time available to use libraries.</p>	
<p>Disability</p>	<p>A reduction in libraries will reduce availability for all users but may have a disproportionate impact on library users who have who have or have acquired a range of disabilities</p> <p>High numbers of people who identify themselves as having mental health issues use libraries.</p> <p>High numbers who specified multiple disabilities also use libraries</p> <p>Libraries reach higher than average levels of people with a disability in Southampton</p> <p>Removal of the Mobile library vehicle will reduce availability for users to access library services. The vehicle has a lift enabling disabled people to</p>	<p>Development of the Housebound Service to deliver materials to least mobile older people staffed by volunteers. There is existing capacity and the potential to recruit further volunteers to serve more readers.</p> <p>Investment in IT utilising retained library IT budget would have the potential to provide better access to Library online services which would include; 24 hour online access to library catalogue, account management and information sources. Library users with sensory impairments may be more likely to utilise digital access to the Library Service. This will</p>

	<p>access library services, operates in Priority Neighbourhoods and has scheduled stops at day care centres and schools.</p> <p>40% of respondents from the Mobile Library in the 2012 Library satisfaction survey (PLUS) described themselves as having a disability. The Mobile Library had a high instance of people with disabilities but very few actual survey returns</p> <p>The needs of disabled people were taken into account in the priority tool as the location of library services may be more acute for some members of this group of people, who may be less able to travel to other libraries</p> <p>The percentage of adults receiving adult social care in the catchment has been included as a demographic indicator in determining needs/priorities for libraries which will continue to be managed by Southampton City Council</p> <p>There are potential a number of areas where the proposal may have a disproportionate impact on library users who have or have acquired a disability:</p> <p>Access – this would include physical access and ability to travel to library buildings and access within the buildings themselves. In terms of mobility related disabilities, those whose local library would not continue to be managed by Southampton City Council would have greater distance to travel and the cost of travelling may impact on their use of libraries. This may be an impact for people with or who acquire an age related disability, for other physical disabilities and learning disabilities. There may also be impacts for those who are blind or have visual impairment or mental health disabilities.</p> <p>Familiarity - with locations and staff are important factors for a number of groups of people with disabilities who rely staff for additional support. For those whose local library would not continue to be managed by Southampton City Council library there may be an impact which may affect</p>	<p>also include: audio and e audio materials, access and support in applying for services and benefits online in libraries e.g. Universal Credit</p> <p>SCC would seek to develop investments in technologies which could include facilities to develop Video/teleconference, online reading groups which may provide alternative ways of accessing and participating in reading and social communities for a range of people across the City.</p> <p>Install new Hearing Loops in all Libraries remaining in City Council control.</p> <p>SCC would seek to develop service level agreements in community run libraries to ensure equality of access to library service this will be a requirement of the agreement with the council. Inclusion training and the provision of resources and technologies for supporting disabled people's specific needs would need to be considered in any service level agreements with SCC and community run libraries.</p> <p>Concessionary bus passes are available for eligible disabled residents under pensionable age and passes are available for eligible carers who may need to accompany an individual, which may mitigate the cost of additional travel costs to access libraries</p>
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	<p>their use of libraries. This may be an impact for people with or who acquire an age related disability, for other physical disabilities and learning disabilities. There may also be impacts for those who are blind or have visual impairment or mental health disabilities.</p> <p>People who are blind or have visual impairment, which can often be onset in older age, may be able to travel independently to a library and access the library on a known and practiced route both externally and internally as they are familiar with the library layout but they may be adversely affected if they needed to switch their library use to a different library.</p> <p>Mental health disability: Some people with mental health disabilities may experience more isolation if they have to travel further to a library service and it requires visiting a new place which could increase anxiety and impact their use of libraries</p> <p>Children with disabilities: Some disabled children and their families may find that if they can no longer visit the library they are used to using and there are a reduced number of libraries across the City this may aggravate the barriers that already exist for them to access library services</p> <p>Libraries are registered and identified as Safe Places as part of a City wide scheme where businesses and services identify themselves as Safe Places and staff will offer additional support to vulnerable people who require assistance. A reduction in the number of libraries managed by the City Council may reduce the availability of Safe Places in specific areas</p>	
Gender Reassignment	There are no specific impacts anticipated for this category and there is no monitoring of diversity of registered library users in this area of diversity	
Marriage and Civil Partnership	There are no specific impacts anticipated for this category and there is no monitoring of diversity of registered library users in this area of diversity	

<p>Pregnancy and Maternity</p>	<p>Although there is no monitoring of diversity of registered library users in this area of diversity it is recognised that pregnant women may find access to libraries more difficult in later stages of pregnancy and mothers are often responsible for looking after babies and young children and this could make access more difficult especially if mothers are single parents and experience economic or social deprivation</p> <p>Activities for pre-school children in the form of storytimes and rhymetimes will reduce as the number of libraries which would continue to be managed by Southampton City Council reduces. This will reduce the number of free sessions available across the City where children and their carers can meet with other children and adults engage with books and in activities which support their leaning and development.</p>	<p>Investment in IT utilising retained library IT budget would have the potential to provide better access to Library online services which would include; 24 hour online access to library catalogue, account management and information sources.</p> <p>SCC would seek to develop investments in technologies which could include facilities to develop Video/teleconference, online reading groups which may provide alternative ways of accessing and participating in reading and social communities for a range of people across the City.</p> <p>SCC would seek to explore continuing running activities in SCC managed Libraries and to develop service level agreements in community run libraries around the delivery of activities such as rhyme and storytime, children's materials and library spaces, homework clubs, family learning and other educational reader development initiatives</p>
<p>Race</p>	<p>The percentage of BME residents in catchment has been included as a demographic indicator in determining needs/priorities for libraries which will continue to be managed by Southampton City Council</p> <p>The needs assessment has taken into account people from minority ethnic backgrounds. Many people from minority ethnic backgrounds live in households concentrated in specific areas of the city. This means the location of a library service could have a greater impact on this group.</p> <p>None of the Mobile Library customers who responded to the question about ethnicity in 2012 Library Satisfaction Survey (PLUS) described themselves as being of an ethnic group other than White British. (Compared to the whole library service where 16% of users who</p>	<p>SCC would seek to develop service level agreements in community run libraries to ensure equality of access to library service this will be a requirement of the agreement with the council. Inclusion training and the provision of resources the specific needs of race and language groups would need to be considered in any service level agreements with SCC and community run libraries</p> <p>Investment in IT utilising retained library IT budget would have the potential to provide better access to Library online services which would include; 24 hour online access to library catalogue, account management and</p>

	<p>responded to the question about ethnicity in 2012 Library Satisfaction Survey (PLUS) identified themselves as being from BME communities)</p>	<p>information sources</p> <p>SCC would seek to develop deposit collections of materials at local community centres. Previous experience suggests that these collections very quickly become obsolete, materials get lost and there is very low usage of the materials</p>
<p>Religion or Belief</p>	<p>There are no specific impacts anticipated for this category and there is no monitoring of diversity of registered library users in this area of diversity</p> <p>It is however recognised that for a number of faith groups and communities libraries are regarded as safe places for women and children. A reduction in the number of libraries of libraries which would continue to be managed by Southampton City Council would reduce the availability of these safe venues across the city</p>	<p>SCC would seek to develop service level agreements in community run libraries to ensure equality of access to library service this will be a requirement of the agreement with the council. Inclusion training and the provision of resources the specific needs of faith groups would need to be considered in any service level agreements with SCC and community run libraries</p> <p>SCC would seek to develop deposit collections of materials at local community faith centres. Previous experience suggests that these collections very quickly become obsolete, materials get lost and there is very low usage of the materials</p>
<p>Sex</p>	<p>A reduction in libraries will reduce availability for all users but may have a disproportionate impact females as more females than males are active users 57% Female 43% Male</p> <p>When other factors are also taken into consideration such as caring responsibilities, dependent children, socio-economic disadvantage and ageing. This is believed to be an area for consideration because: Women are more likely to be carers either of children or of adults and to be responsible for accompanying children or the person they care for to the library. If they need to transfer their library use to a different library to the one currently used this could present difficulties in terms of travel and access and costs. Lone parents are more likely to be women and if they are experiencing socio- economic</p>	<p>Investment in IT utilising retained library IT budget would have the potential to provide better access to Library online services which would include; 24 hour online access to library catalogue, account management and information sources. Although the predominant activity of both genders is to borrow books, men are more likely than women to use the library solely for computer use so the development of the virtual library services could have a positive effect for men and help to improve access to library services and attracting some who do not</p> <p>Concessionary bus passes are available for eligible disabled</p>

	<p>deprivation this could aggravate their ability to pay for public transport and access library services. Libraries may be an important source of reading for children from poorer families. Older women represent a significant proportion of older library users and there is some suggestion that proportionally, as they age and become less independently mobile, that they may be more likely to be affected if they can no longer get to a library independently</p> <p>Activities for pre-school children in the form of storytimes and rhymetimes will reduce as the number of libraries which would continue to be managed by Southampton City Council reduces. This will reduce the number of free sessions available across the City where children and their carers can meet with other children and adults engage with books and in activities which support their learning and development.</p>	<p>residents under pensionable age and passes are available for eligible carers who may need to accompany an individual, which may mitigate the cost of additional travel costs to access libraries</p> <p>SCC would seek to explore continuing running activities in SCC managed Libraries and to develop service level agreements in community run libraries around the delivery of activities such as rhyme and storytime, children's materials and library spaces, homework clubs, family learning and other educational reader development initiatives</p>
<p>Sexual Orientation</p>	<p>There are no specific impacts anticipated for this category and there is no monitoring of diversity of registered library users in this area of diversity</p>	
<p>Community Safety</p>	<p>Libraries offer a place where people who might otherwise fall into anti-social behaviour can use their time productively. A number of libraries are located in priority communities where levels of anti-social behaviour are high in places. The reduced hours and availability will limit the ability of the service to act as a diversion in this way.</p> <p>Libraries are registered and identified as Safe Places as part of a City wide scheme where businesses and services identify themselves as Safe Places and staff will offer additional support to vulnerable people who require assistance. A reduction in the number of libraries managed by the City Council may reduce the availability of Safe Places in specific areas.</p> <p>Unoccupied buildings will be a focus for</p>	

	anti social behaviour	
Poverty	<p>Southampton ranked 81st most deprived local authorities.</p> <p>There are 9 Lower super output areas (LSOA) in Southampton which are in the 10% most deprived in country</p> <p>The location of library services is acute for this group of people as the cost of travelling to another library could be a barrier to accessing the service. Libraries are mainly a free service and any reduction in their availability is likely to be more keenly felt by people on low income. In particular, libraries offer a place where children can spend their time at no cost to their parents. The loss of free internet access may disproportionately impact on people with low incomes. The availability of free books and internet access is of greater importance when income levels are low. The proposal to reduce the number of libraries managed by SCC would reduce the number of access points to books and free internet access across the City. This will impact all library users but would have a disproportionate impact on people with low income and reduce access to learning, support, online access for job applications and other benefit applications.</p> <p>The Index of Multiple of Multiple Deprivation ((An Average overall score) has been included as a demographic indicator in determining needs/priorities for determining needs/priorities for libraries which will continue to be managed by Southampton City Council</p>	<p>Investment in IT utilising retained library IT budget would have the potential to provide better access to Library online services which would include; 24 hour online access to library catalogue, account management and information sources – The mitigation offered by better access to online services may be reduced for people on low income –digital literacy training needs and access to computers may be an issue for many people on low income and is reflected by the high use made of library public access computers and the demand for help and support from library staff to fill in on line applications.</p>
Other Significant Impacts	<p>Educational Attainment</p> <p>Schools and nurseries</p> <p>In addition to the impact a reduction in the number of libraries managed by the City Council may have on individual children (17.5% active library users) whose ability to access libraries is limited by attendance at school and college to after school/ weekends in term time and who would have greater</p>	<p>The percentage of 0-11 years old in the catchment has been included as a demographic indicator in determining needs/priorities for libraries which will continue to be managed by Southampton City Council</p> <p>The percentage of school pupils up to KS2 deemed low performers has been included</p>

	<p>distance to travel and the cost and safety implications of travelling on their own may impact on their use of libraries. There would be a corresponding impact on schools and nurseries in areas where libraries would no longer be managed by SCC. This would relate to the local availability of materials and computers to support and supplement learning outside of school, school and nursery visits, library membership initiatives. Though many schools have school libraries these are often particularly in Primary schools small in size and all are only available during term times and school hours. 40 early years settings are served by the Mobile Library through a 4 weekly timetable</p> <p>Digital Access/Digital Inclusion.</p> <p>While the internet has great potential to help tackle social exclusion those who could benefit the most from being online are currently among the least likely to be connected. A fifth of UK households do not have internet services. This rises to more than a third of households in the lowest socio-economic groups and to nearly 70% of households with people aged over 75.</p> <p>The shift to digital forms of interaction-channel shift or digital first- has presented particular challenges for people who are online. The library service is the largest and arguably busiest provider of free public computer access in the City. With free public internet, Wi-Fi and email access is available in every library from 150 computers. Last year 2013-14 there were a total of 223,384 public network sessions in libraries and 19,000 people used public access computers for almost 170,000 hours for leisure, learning, council services and job hunting. In a typical day library staff will be required to process Smart Cities queries, help with Citizenship applications, sign people onto Homebid, help people with Universal Job Match, work on CVs, book flights as well as help customers use the range of SCC. The proposal to reduce the number of libraries managed by SCC would reduce the number of access points to books and free</p>	<p>as a demographic indicator in determining needs/priorities for libraries which will continue to be managed by Southampton City Council</p>
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	<p>internet access across the City. This will impact all library users but would have a disproportionate impact on people with low digital literacy skills, low income and reduce access to learning, support, online access for job applications and other benefit applications.</p> <p>Voluntary Groups/ Community Groups– Community Library Model</p> <p>Co-dependant groups/organisations</p> <p>40 early years settings and 20 sheltered housing establishments are served by the Mobile Library. (refer to list of Co-dependent organisations Appendix 8)</p> <p>Staff Separate EIA required</p>	
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