



### You will need to produce an Equality Impact Assessment (EqIA) if:

- You are developing a new policy, strategy, or service
- You are making changes that will affect front-line services
- You are reducing budgets, which may affect front-line services
- You are changing the way services are funded and this may impact the quality of the service and who can access it
- You are making a decision that could have a different impact on different groups of people
- You are making staff redundant or changing their roles

Guidance notes on how to complete an EqIA and sign off process are available on the Hub under Equality and Diversity. You must read the [guidance notes](#) and ensure you have followed all stages of the EqIA approval process (outlined in appendix 1). Section 2 of the template requires you to undertake an assessment of the impact of your proposals on groups with protected characteristics. Equalities and borough profile data, as well as other sources of statistical information can be found on the Harrow hub, within the section entitled: [Equality Impact Assessment](#) - sources of statistical information.

## Equality Impact Assessment (EqIA)

<b>Type of Decision:</b>	<input checked="" type="radio"/> Cabinet <input type="radio"/> Portfolio holder <input type="radio"/> Other (state)	
<b>Title of Proposal</b>	Harrow Economic Strategy 2023 - 2026	<b>Date EqIA created 23/05/23</b>
<b>Name and job title of completing/lead Officer</b>	Mavis Kusitor, Economic Strategy Programme Manager	
<b>Directorate/ Service responsible</b>	Place Directorate, Inclusive Economy	
<b>Organisational approval</b>		
<b>EqIA approved by</b>	<b>Name:</b>	<b>Signature</b>
EDI Policy Officer, Yasmeen Hussein	Yasmeen Hussein	<input checked="" type="checkbox"/> Tick this box to indicate that you have approved this EqIA  Date of approval: 31.05.23

## 1. Summary of proposal, impact on groups with protected characteristics and mitigating actions

(to be completed after you have completed sections 2 - 5)

### a) What is your proposal?

The Harrow Economic Strategy 2023-2026 has been developed as our framework to address some of the root causes of poverty and inequality, by addressing low skills and wages, creating jobs and addressing inequalities to improve the skills and employability of our residents and stimulating business growth and job creation. This strategy pulls together the opportunities to support the local economy, generate skills, employment and apprenticeships.

The strategy aims to achieve our corporate vision of Restoring Pride in Harrow and the three priorities:

- A Council that puts residents first
- A borough that is clean and safe
- A place where those in need are supported

The strategy is divided into four priority areas:

- Skills and Employability
- Business Growth and Job Creation
- High Streets
- Partnership Working

### b) Summarise the impact of your proposal on groups with protected characteristics

We do not anticipate that the Strategy will have a negative impact on Harrow residents or result in any direct or indirect discrimination of any group that shares protected characteristics. The Strategy will help to advance the equality of opportunity for groups who share relevant protected characteristics and those who do not by addressing inequalities around access to employment and skills, rates of pay and business opportunities.

### b) Summarise any potential negative impact(s) identified and mitigating actions

- While the EQIA process has not identified any negative impacts on groups with protected characteristics, the following issues should be taken into consideration:
- There is limited data on Harrow's large micro-business sector, in terms of ownership by protected characteristics. Therefore, it is recommended that work is undertaken to gather baseline data, to ensure that the borough can respond to the needs of local businesses.
- Where appropriate, equality monitoring is incorporated as part of the performance monitoring process for all projects, initiatives and actions to support the delivery of the Strategy.

2. Assessing impact																			
You are required to undertake a detailed analysis of the impact of your proposals on groups with protected characteristics. You should refer to <a href="#">borough profile data</a> , <a href="#">equalities data</a> , service user information, consultation responses and any other relevant data/evidence to help you assess and explain what impact (if any) your proposal(s) will have on <b>each</b> group. Where there are gaps in data, you should state this in the boxes below and what action (if any), you will take to address this in the future.		What does the evidence tell you about the impact your proposal may have on groups with protected characteristics? Click the relevant box to indicate whether your proposal will have a positive impact, negative (minor, major), or no impact																	
Protected characteristic	For <b>each</b> protected characteristic, explain in detail what the evidence is suggesting and the impact of your proposal (if any). Click the appropriate box on the right to indicate the outcome of your analysis.	Positive impact	Negative impact		No impact														
			Minor	Major															
Age	<p>Harrow has a resident population of 261,300<sup>1</sup>. Increasing by 9.3% in the ten years between 2011 and 2021 with an increase of 7.8% in people aged 15 to 64 years, it has an above average working age population aged 16-64 of just under 65% (169k) and a growing younger population aged 0-15 of 18.5% (48k), which is higher than the London average, suggesting that the borough is a popular destination for families<sup>2</sup>.</p> <table border="1"> <caption>Population by Age band % (Harrow 2021 Census)</caption> <thead> <tr> <th>Age Band</th> <th>Percentage</th> </tr> </thead> <tbody> <tr> <td>0-15</td> <td>20%</td> </tr> <tr> <td>16-24</td> <td>10%</td> </tr> <tr> <td>25-49</td> <td>37%</td> </tr> <tr> <td>50-64</td> <td>18%</td> </tr> <tr> <td>65-84</td> <td>13%</td> </tr> <tr> <td>85+</td> <td>2%</td> </tr> </tbody> </table>	Age Band	Percentage	0-15	20%	16-24	10%	25-49	37%	50-64	18%	65-84	13%	85+	2%	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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<sup>1</sup> Census 2021

<sup>2</sup> Census 2021

	<ul style="list-style-type: none"> <li>• As with most areas in the country, the borough has an ageing population. With the number of residents aged 65 plus Increasing by 19.4% in the ten years between 2011 and 2021 with 31% rise in people aged 90 years and over<sup>3</sup>. Those aged 85 plus could increase by 60% by 2030<sup>4</sup>.</li> <li>• Data available shows that the pandemic has adversely impacted young people aged 18-24, with 1 in 10 young people out of work<sup>5</sup>.</li> <li>• Harrow has one of the lowest proportions of young people Not in Education, Employment and Training (NEETS). However, due to the Covid-19 pandemic, there has been a significant increase in numbers, from 0.8% to 1.8%<sup>6</sup>. (Now 1.2% August 2022<sup>7</sup>)</li> </ul> <p><b><u>Impact</u></b></p> <ul style="list-style-type: none"> <li>• The Strategy will have a positive impact on all residents in supporting residents to access skills and employment.</li> <li>• The projects, initiatives and actions that support the strategy will aim to be inclusive of all residents regardless of their age.</li> </ul> <p>The Strategy aims to:</p> <ul style="list-style-type: none"> <li>• Support young people with post 16 options such as apprenticeships, traineeships and vocational qualifications, including in new emerging industries</li> <li>• Develop routes into vocational qualifications in key employment sectors including health, social care, and IT as well as growth sectors.</li> <li>• Reduce the number of NEETS to pre-Covid levels (0.8%) or lower.</li> <li>• Ensure that support is given to all working age residents that are most in need into educational pathways.</li> </ul>				
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<sup>3</sup> Census 2021

<sup>4</sup> Poppi and Pansi projections to 2030

<sup>5</sup> DWP Job claimant data April 2021

<sup>6</sup> NEETS data at December 2020.

<sup>7</sup> NEETS data at December 2022.

<p><b>Disability</b></p>	<ul style="list-style-type: none"> <li>The 2021 Census data shows that 9.75% of Harrow's population aged 15 to 64 years have a disability this equates to 16,840 people.</li> </ul> <p><b><u>Impact</u></b></p> <ul style="list-style-type: none"> <li>The Strategy will aim to support residents from disabled and other disadvantaged communities to access skills and employment through its Adult Learning strategy and employment support programmes.</li> <li>The plans also aim to make our towns and district centres more accessible.</li> <li>The projects, initiatives and actions that support the strategy will aim to be inclusive of all residents regardless of their disability status.</li> <li>EDI targets including the participation levels of disabled people is built into some of the projects that support the delivery of the strategy.</li> </ul>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<p><b>Gender reassignment</b></p>	<p>The 2021 Census data shows the following:</p> <ul style="list-style-type: none"> <li>90.12% of Harrow residents described themselves as having the same gender identity as sex registered at birth (188,901 respondents)</li> <li>0.53% of Harrow residents described themselves as having a gender identity which differs to the sex registered at birth, but gave no specific identity (1,108 respondents)</li> <li>0.15% of Harrow residents described themselves as a Trans woman (318 respondents)</li> <li>0.16 of Harrow residents described themselves as a trans man (342 respondents)</li> <li>0.03% of Harrow residents described themselves as non-binary (57 respondents)</li> <li>0.03% of Harrow residents described themselves as 'All other gender identities' (59 respondents)</li> <li>8.98% of Harrow residents did not respond (18,832 respondents)</li> </ul> <p><b><u>Impact</u></b></p> <ul style="list-style-type: none"> <li>The Strategy will have a positive impact on all residents in supporting residents to access skills and employment.</li> <li>The projects, initiatives and actions that support the strategy will aim to be inclusive of all residents regardless of their gender reassignment status.</li> </ul>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

<p><b>Marriage and Civil Partnership</b></p>	<ul style="list-style-type: none"> <li>At the time of the 2021 Census 53.9% of Harrow's residents were married or in a registered civil partnership, which was the highest level in London.</li> <li>21% of households were married, or in same-sex civil partnerships, with dependent children, the highest level in London.</li> <li>At October 2020 there have been 144 Same Gender Civil Partnerships in Harrow, 25 of which has been converted to a Marriage. There have been 8 Opposite Gender Civil Partnerships. There have been 57 Same Sex marriages.</li> </ul> <p><b>Impact</b></p> <ul style="list-style-type: none"> <li>The Strategy will have a positive impact on all residents in supporting residents to access skills and employment.</li> <li>The projects, initiatives and actions that support the strategy will aim to be inclusive of all residents regardless of their marriage and partnership status.</li> </ul>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<p><b>Pregnancy and Maternity</b></p>	<ul style="list-style-type: none"> <li>ONS births figures show Harrow as having 3,312 live births in 2021<sup>8</sup>. 14 live births per 1000 population is higher than the England &amp; Wales average of 10.8</li> <li>The borough has a higher-than-average infant mortality rate in London, at a rate of 3.9 deaths per 1000 live births, which is an indicator of poverty and inequality in the borough.<sup>9</sup></li> <li>Nationally, women have faced discrimination during pregnancy and maternity in the workplace. EHRC Survey data shows that around one in nine mothers (11%) reported that they were either dismissed; made compulsorily redundant, where others in their workplace were not.</li> </ul> <p><b>Impact</b></p> <ul style="list-style-type: none"> <li>The Strategy will have a positive impact on all residents in supporting residents to access skills and employment.</li> <li>The projects, initiatives and actions that support the strategy will aim to be inclusive of all residents regardless of their pregnancy and maternity status, including residents with childcare/caring responsibilities.</li> </ul>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

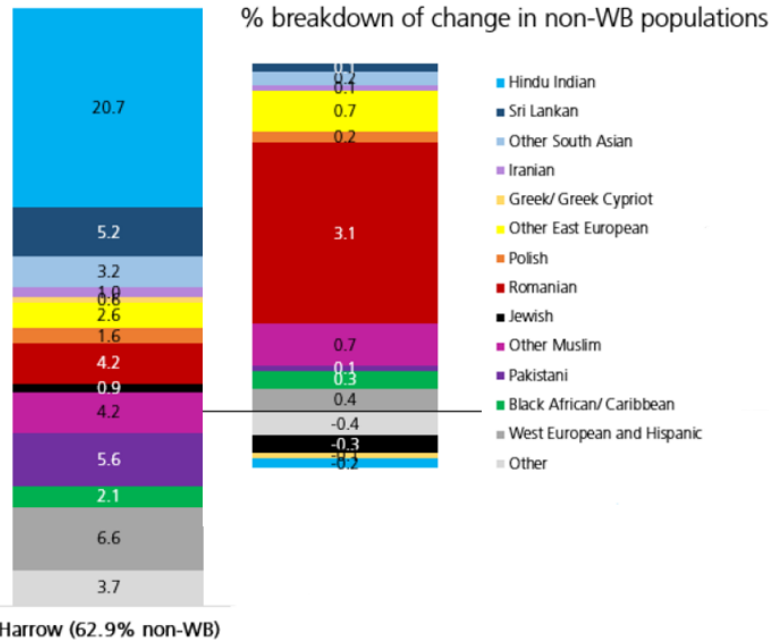
<sup>8</sup> Source: Office for National Statistics (ONS, 2022), Live births in England and Wales 2021

<sup>9</sup> Public Health England (2022), London's Poverty Profile 2022,



Race/  
Ethnicity

% breakdown of non-WB populations, 2019



- Harrow is one of the most culturally diverse local authorities in the UK, with over 60% of residents from Black, Asian, and Multi-Ethnic backgrounds and an estimated 20% Eastern European community, which is fast growing<sup>10</sup>. Black African (notably the Somali Community) groups have been fast growing over the last 6 years or so, as has the Afghan community.
- Unemployment rates are significantly higher in certain areas of the borough, particularly in the Wealdstone and Marlborough wards (central Harrow) and Roxbourne (south Harrow), focused in an around the Rayners Lane estate and among residents classified as Black and Other ethnic groups. These areas are also ranked high on the indices of deprivation for the UK.

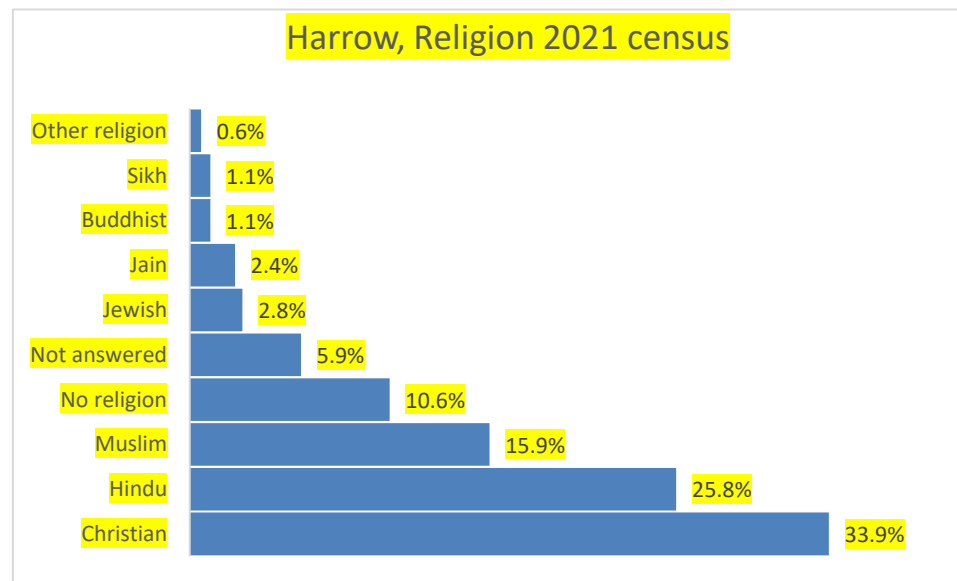


<sup>10</sup> Harrow Economic assessment 2019-2020: population

	<ul style="list-style-type: none"> <li>• The majority of 16–18-year-olds that are classed as NEET are from Black, Asian, and Multi-Ethnic backgrounds and located in wards with high levels of deprivation. However, the data also shows that the single largest ethnic group of pupils aged 16-18 classed as NEET is White British.</li> <li>• At ward level Marlborough, and Wealdstone have the highest number of households in need of re-housing. These respectively have a Black, Asian, and Multi-Ethnic population of 77% and 75%.</li> <li>• Black, Asian, and Multi-Ethnic residents are more likely to experience barriers to employment due to lack of English language, functional and digital skills.</li> <li>• Over 94% of Harrow businesses are classed as micro-businesses. There is limited data on the profile of business ownership by protected characteristics. Anecdotal evidence suggests that most retail businesses in Harrow’s town centres are Black, Asian, and Multi-Ethnic - owned.</li> </ul> <p><b>Impact</b></p> <ul style="list-style-type: none"> <li>• The Strategy will have a positive impact on all residents in supporting residents to access skills and employment.</li> <li>• The Strategy will ensure that Harrow’s Black, Asian and Multi-Ethnic communities and businesses are supported to access wide skills offer, leading to better paid jobs and business growth.</li> <li>• The strategy also supports the priorities of the Council’s Equality and Diversity Strategy and Adult Learning Strategy to ensure that our borough is a place where everyone, regardless of background, can reach their full potential.</li> <li>• The projects, initiatives and actions that support the strategy will aim to be inclusive of all residents regardless of their race and ethnicity.</li> </ul>				
<p><b>Religion or belief</b></p>	<p>Religious diversity is strong in Harrow. At the 2011 Census Harrow was the most religiously diverse borough in the country with the highest number Hindus (25%) and Jains (2.2%) and the second highest number of Zoroastrians.</p> <p>At the 2021 census Harrow had the highest number (and proportion) of Hindu followers in the country (25.8%). At 2.8% Harrow 's Jewish community was the ninth largest nationally. 33.9% of residents described themselves as Christians (the 11th lowest proportion in the country) and 15.9% described themselves as Muslims. Harrow had the lowest ranking for 'no religion' (10.9%).</p> <p>As the population’s ethnic composition changes, rates of participation in various religions are also likely to change<sup>11</sup>.</p>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

<sup>11</sup> Harrow Economic Assessment: 2019-2020: population

There is limited data on employment/unemployment rates for Harrow by religion. Data for London suggests that educational attainment and employment among the capital's Muslim community is lower than those from other faith groups located in the borough<sup>12</sup>.



**Impact**

- The Strategy will have a positive impact on all residents in supporting residents to access skills and employment.
- The projects, initiatives and actions that support the strategy will aim to be inclusive of all residents regardless of their religion or beliefs.
- EDI targets including the participation levels of Black, Asian and Multi-Ethnic people is built into some of the projects that support the delivery of the strategy.

<sup>12</sup> Annual Population Survey 2018.

<p><b>Sex</b></p>	<ul style="list-style-type: none"> <li>The 2021 Census show that the total population of Harrow is now 261,300, made up of 132,500 women (50.7%) and 128,800 men (49.3%). Overall, the number of males and females living in Harrow is very similar.</li> <li>Economic activity among Harrow’s male population is higher than the London average at 89.2%, compared with 83.8%.</li> <li>Economic activity among females in the borough is also higher than the London average at 75.4%, compared with 74.9%<sup>13</sup>.</li> <li>Harrow is a low wage borough, with all those that are employed in the borough earning gross weekly earnings of £514.20, which is 37% less than the London average of £815.90. Women in the borough have gross weekly earnings of £485.90 and men in the borough earn £615.00. The London average earnings for women is £669.20 and for men it is £935<sup>14</sup>.</li> <li>20% of Harrow businesses are female led.<sup>15</sup></li> <li>While the pandemic may have negatively impacted both sexes, the shift to home working may have had a positive impact in enabling women to return to work, as they are able to share childcare responsibilities.</li> </ul> <p><b>Impact</b></p> <ul style="list-style-type: none"> <li>The projects, initiatives and actions that support the strategy will aim to be inclusive of all residents regardless of their sex.</li> <li>EDI targets including the participation levels of women is built into some of the projects that support the delivery of the strategy.</li> </ul>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<p><b>Sexual Orientation</b></p>	<p>The 2021 Census shows that 4.27 % of Londoners identify as LGBTQIA+, the highest of any UK region<sup>16</sup>. 1.65% of Harrow residents identify as LGBTQIA+, this is approx. 4k people<sup>17</sup>.</p> <p>LGBTQIA+ people are also likely to be underrepresented among business owners within Harrow. There is no official data on sexual orientation for Harrow in relation to employment.</p> <p><b>Impact</b></p>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

<sup>13</sup> Source: ONS annual population survey (September 2022)

<sup>14</sup> Source: ONS earnings by place of work: 2021

<sup>15</sup> Beauhurst: number of companies registered at Companies House that are female led (April 2021)

<sup>16</sup> Source: 2021 Census

<sup>17</sup> Source: 2021 Census

- The Strategy will have a positive impact on all residents in supporting residents to access skills and employment.
- The projects, initiatives and actions that support the strategy will aim to be inclusive of all residents regardless of their sexual orientation.

**2.1 Cumulative impact – considering what else is happening within the Council and Harrow as a whole, could your proposals have a cumulative impact on groups with protected characteristics?**

Yes                      No   

If you clicked the Yes box, which groups with protected characteristics could be affected and what is the potential impact? Include details in the space below

**2.2 Any other impact - considering what else is happening nationally/locally (national/local/regional policies, socio-economic factors etc), could your proposals have an impact on individuals/service users, or other groups?**

Yes                      No   

If you clicked the Yes box, Include details in the space below

- The uncertainty of the cost-of-living may affect resident’s ability to engage in skills development and employability support and also impact the growth and survival rates of businesses.

**3. Actions to mitigate/remove negative impact**

**Only complete this section if your assessment (in section 2) suggests that your proposals may have a negative impact on groups with protected characteristics. If you have not identified any negative impacts, please complete sections 4 and 5.**

In the table below, please state what these potential negative impact (s) are, mitigating actions and steps taken to ensure that these measures will address and remove any negative impacts identified and by when. Please also state how you will monitor the impact of your proposal once implemented.

State what the negative impact(s) are for <b>each</b> group, identified in section 2. In addition, you should also consider, and state potential risks associated with your proposal.	Measures to mitigate negative impact (provide details, including details of and additional consultation undertaken/to be carried out in the future). If you are unable to identify measures to mitigate impact, please state so and provide a brief explanation.	What action (s) will you take to assess whether these measures have addressed and removed any negative impacts identified in your analysis? Please provide details. If you have previously stated that you are unable to identify measures to mitigate impact, please state below.	Deadline date	Lead Officer
<p><b>Cost-of-living may affect resident's ability to engage in skills development and employability support.</b></p> <p><b>a) Pregnancy / Maternity:</b> Single parents are among those most exposed to the cost-of-living crisis, particularly those aged 25 and under, who get a reduced rate of universal credit. Given this, it may be harder for these individuals to engage in employability support.</p> <p>However, the Economic Strategy states that the Council has pledged to reduce Council Tax bills for less well-off families and roll out full fibre broadband to Council housing.</p> <p><b>b) Sex</b></p>	<p>The cost of living continues to affect households across the UK, the government has announced a new package of payments to help most households claiming benefits. Residents can contact the Council for guidance on the help that is available to them.</p> <p>Learn Harrow is the Council's Adult Community Learning Service and focal to its provision is to achieve the Council's priority to support those most in need, in doing so the Community Learning programme will include targeted support for the following groups:</p> <ul style="list-style-type: none"> <li>• Unemployed adults and residents at risk of redundancy</li> <li>• Adults in low-paid employment (earning less than London Living</li> </ul>	<p>The cost of living is a national crisis. We will assess the trend using data provided by government and other data agencies.</p>	<p>Ongoing</p>	<p>Mavis Kusitor</p>

<p>Harrow's economically active male population is 89.2%, compared with the female population at 75.4%.</p> <p>Harrow is a low wage borough, women in the borough have gross weekly earnings of £485.90 and men in the borough earn £615.00. The London average earnings for women is £669.20 and for men it is £935.10.</p> <p><b>c) Race / Ethnicity:</b> Black, Asian and Multi-ethnic residents are more likely to experience barriers to employment due to lack of English language, functional and digital skills.</p> <p><b>d) Disability:</b> Disabled individuals who have lower income than their non-disabled counterparts will be disproportionately impacted by the cost-of-living crisis.</p>	<p>Wage)</p> <ul style="list-style-type: none"> <li>• Older learners, particularly those in an isolated or vulnerable situation</li> <li>• Families, particularly where parents have basic English or Maths needs or who have not reached Level 2, where there is a single parent or families with complex needs</li> <li>• Disabled learners including those with mild to moderate mental health issues, learning difficulties or physical and sensory impairments.</li> </ul> <p>Therefore, the Council moves to mitigate the negative impact the cost-of-living will have by making access to skills development and employability support accessible to people most in need.</p>			
<p><b>Cost-of-living may harm the growth and survival rates of businesses.</b></p> <p><b>a) Sex:</b> 6% of women in Harrow aged 16 to 64 years are self-employed, this is less</p>	<p>Although we cannot directly influence a business' decision to cease trading or to relocate outside of the borough, the Council works in close partnership with stakeholders and support agencies including</p>	<p>The Economic Strategy includes a baseline measure and target on business survival rates in Harrow. Performance against this measure will be tracked and</p>	<p>Ongoing</p>	<p>Mavis Kusitor</p>

<p>than the London average of 8.5%. Whereas 13.5% of men in Harrow aged 16 to 64 years are self-employed, this is close to the London average of 14%.</p> <p><b>b) Race / Ethnicity:</b> Harrow is one of the most culturally diverse local authorities in the UK, with over 60% of residents being Black, Asian, Multi-ethnic or Other ethnic group.</p> <p>Many residents operate micro businesses that are disproportionately impacted by the cost-of-living crisis as they lack the benefit of consumer protection schemes such as the energy price cap.</p> <p>Due to the cost of living, many businesses are finding it harder to stay open, especially those based on the high street which rely on passing trade.</p> <p><b>c) Disability:</b> There is a strong correlation between disability, in particular the extent of the disability and economic inactivity. There</p>	<p>Harrow Town Centre BID (HA1 BID), Federation of Businesses, North-west London Chamber of Commerce, London Business Hub and London &amp; Partners Wayfinder to track business activity. There is a Business Forum that meets every four months to discuss key matters pertaining to businesses, members include some of those named above. The Economic Development team provide business engagement support and can signpost struggling businesses to available resources.</p> <p>The UK Shared Prosperity Fund programme will provide targeted support for existing female, Black, Asian and Multi-ethnic and disabled business owners and residents that are interested in starting a business.</p>	<p>compared against regional and national trends.</p>		
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<p>are also particular groups that have specific obstacles in progressing to the labour market or sustaining self-employment. These include adults with learning disabilities and those with severe mental health issues. Disabled people are also likely to be under-represented among business owners within Harrow.</p>				
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#### 4. Public Sector Equality Duty

How does your proposal meet the Public Sector Equality Duty (PSED) to:

1. Eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Equality Act 2010
2. Advance equality of opportunity between people from different groups
3. Foster good relations between people from different groups

#### Include details in the space below

1. The Harrow Economic Strategy 2023-26 will not result in any direct or indirect discrimination of any group that share protected characteristics.
2. The Harrow Economic Strategy 2023-26 will address some of the root causes of poverty and inequality, by addressing low skills and wages, creating jobs and addressing inequalities to improve the skills and employability of our residents and stimulating business growth and job creation.

#### 5. Outcome of the Equality Impact Assessment (EqIA) click the box that applies

Outcome 1

**No change required: the EqlA has not identified any potential for unlawful conduct or disproportionate impact and all opportunities to advance equality of opportunity are being addressed**

**Outcome 2**

**Adjustments to remove/mitigate negative impacts identified by the assessment, or to better advance equality, as stated in section 3&4**

**Outcome 3**

**This EqlA has identified discrimination and/ or missed opportunities to advance equality and/or foster good relations. However, it is still reasonable to continue with the activity. Outline the reasons for this and the information used to reach this decision in the space below.**

Include details here