

Meeting of the Housing and Safer Communities Select Committee – 22nd January 2024

Report of the Director of Housing and Communities

Annual update on the Safe and Sound Partnership priorities and update on improvements to managing neighbour disputes and anti-social behaviour

Purpose of report

1. The purpose of this report is to provide an overview of Safe and Sound (Dudley's Community Safety Partnership) and an update on the ongoing work to improve the management of neighbour disputes and anti-social behaviour.

Recommendations

2. It is recommended that the content of the report is noted.

Background

- 3. Safe and Sound is Dudley's Community Safety Partnership, as required in statute by the Crime and Disorder Act 1998, its subsequent amendments and other relevant legislation.
- 4. The Crime and Disorder Act 1998 Section 17 (amended June 2010) states that "without prejudice to any other obligation imposed on it, it shall be the duty of each authority to exercise its various functions with due regard to the likely effect of the exercise of those functions on, and the need to do all that it reasonably can to prevent crime and disorder including anti-social behaviour, reduce re-offending, prevent behaviour adversely affecting the environment, and prevent the misuse of drugs, alcohol and other substances in its area."



- 5. The Responsible Authorities are: -
 - Dudley MBC
 - West Midlands Police
 - West Midlands Fire and Rescue Service
 - National Probation Service
 - Integrated Care Board
- 6. There is a duty to cooperate with the Police and Crime Commissioner and the Responsible Authorities also have a statutory duty to ensure that key agencies come together to work in partnership in a Community Safety Partnership.
- 7. The Community Safety Partnership's statutory requirements include: -
 - to do all it reasonably can to prevent crime and disorder including anti-social behaviour
 - produce an annual strategic assessment
 - reduce re-offending
 - prevent behaviour adversely affecting the environment
 - prevent the misuse of drugs, alcohol, and other substances in its area
 - take responsibility for the domestic homicide review process
 - Hold at least one public meeting per year so that members of the public can meet senior decision makers

Local Governance

8. The work of the Dudley Community Safety Partnership is directed by the Safe and Sound Strategic Board. The Board is co-chaired by Chief Superintendent Anthony Tagg and by Hayley Rowley, Dudley MBC Head of Safer Communities.

The Board also acts as Dudley's Local Police and Crime Board.

- 9. The Cabinet Member and Shadow Cabinet Member for Housing and Community Services are members of the Community Safety Partnership Board together with representatives from the Responsible Authorities and Community, Voluntary and Faith Sectors.
- 10. The work of Safe and Sound is carried out by a number of sub-groups that relate to the Board's priorities, as set out in sections 13 and 14 below. See structure chart in appendix 1.

Safe and Sound – Priorities

Priorities are identified through Dudley Borough's Strategic Assessment, and through engagement with our communities through 'Dudley: Have Your Say' an annual public meeting, survey and through online consultation.

Dudley Have Your Say told us as follows:

Responses to the 2022/2023 survey showed that residents consider anti-social behaviour, house burglaries and dangerous driving to be the main concerns of our communities across the borough.

Within the anti-social behaviour category, litter, criminal damage/ graffiti, and young people 'hanging around' were identified as the main concerns.

The 2023 / 2024 survey is available online for completion by those that live and work within the borough, or in hard copy format on request. Views collected from the survey will again feed into the partnership response to the priorities and the annual strategic assessment.

The 2023 / 2024 public meeting will be taking place on March 19th at Stourbridge Town Hall. Further details can be found at: <u>https://www.dudleysafeandsound.org/have-your-say</u>

11. Views obtained from last year's survey have informed this year's strategic priorities, including influencing the development of the newly formed Road Safety Group, improved joined up working across council directorates such as Street Care and Environmental Health.

Using the data we gather, and the views of our communities, the current Safe and Sound priorities are:

- Tackling neighbourhood crime and anti-social behaviour (ASB)
- Domestic abuse and violence against women and girls: safeguarding victims and tackling perpetrators
- Reducing re-offending and tackling the causes of crime
- Reducing violence and exploitation: safeguarding those at risk of violence and exploitation
- Tackling hate crime, community tensions and extremism
- Contributing to the wellbeing & inequalities strategy
- Improving the trust and confidence of all of the communities of Dudley

Safe and Sound Strategic Board

12. The work of the board is delivered through its subgroups. The Safe & Sound board hold its subgroups to account for their contributions to its aims and purpose and for their performance.

The responsible sub-groups are:

• Dudley domestic abuse local partnership board (and its Subgroups which include the MARAC Governance Group (Multi-Agency Risk Assessment Conference for High risk victims of DA), Domestic Homicide Governance

Group and the Domestic Abuse and Violence Against Women and Girls Forum);

- Violence Against Women & Girls (VAWG) Strategic Group
- Violence Prevention Group
- Dudley Combatting Drug and Alcohol Misuse Partnership
- Modern Slavery Strategic Group
- Rogue Landlord Operational Group
- CONTEST Board currently being developed
- Prevent Delivery Group
- Protect Delivery Group currently being developed
- Channel Panel
- Community Cohesion / Tension Monitoring Group (including Hate Crime)
- Road Safety Group newly developed
- Safer Places
- Youth Justice Services (YJS) Management Board
- 13. Each Sub-group lead provides a written quarterly update on activity and progress to the Safe & Sound Board and will attend the quarterly Board meeting. The Safe & Sound Board report as necessary on those activities that impact upon the Dudley Borough Vision's aspirations.

Online Harms, Reducing Re-offending and Serious Organised Crime remain priorities that run as a 'golden thread' across all groups within the CSP.

14. Work will take place in advance of the new year, 2024 / 2025, to revise the current reporting requirements to ensure that each subgroup has a framework in place to ensure that performance is measured and that outcomes and the direct impact of the groups can be evidenced.

Regional Links

15. There are formal links to work that takes place at a regional level, for example with the Police and Crime Commissioner's Office and the four "Exploitation Boards" that sit within this structure (Domestic Abuse, Modern Slavery and Human Trafficking, Sexual Assault and Abuse, and Exploitation and Missing), in addition to the West Midlands Violence Reduction Partnership, the West Midlands Wide CSP, and the Regional Reducing Reoffending Delivery Group.

Crime data overview

16. At the time of writing data, West Midlands Police Data was available for the Quarter 2 period of 2023 / 2024:

The most recent iQuanta data (October 2023) shows that Dudley remains the safest Community Safety Partnership within the West Midlands Police Force area with the lowest crime rate per 1000 population (1.567).

Total recorded crime during Q2 this year, compared to last year, saw a decrease of 898 (11.8%). Dudley accounted for 8.0% of the total recorded crime within West Midlands Police during Q2, with violence against the person being the main offence, accounting for 42.2% of the total recorded crime in the borough.

Sub-group Progress and Highlights over the last 12 months

17. Dudley Domestic Abuse Local Partnership Board (DDALPB)

The Dudley Domestic Abuse Local Partnership Board is a statutory board in its own right. Its purpose is to ensure oversight of the duties under the Domestic Abuse Act 2021 and the Domestic Abuse Strategy.

The DDALPB has overseen a refreshed Domestic Abuse needs assessment and subsequent refresh of the Domestic Abuse Strategy. This new strategy will inform the action plan for the group and the work of partners over the next 2 years.

Included in the groups action plan are actions from Domestic Homicide reviews, to ensure that practice improves / changes as a result of these reviews.

The group has oversight of the Domestic Abuse New Burdens fund, arising from the Domestic Abuse Act 2021 and the work commissioned as a result of the needs assessment, for example, support in safe accommodation and a comprehensive training offer across sectors.

Reports are received from service providers on a quarterly basis to ensure that appropriate services are being delivered to our residents and that any new and emerging trends/issues/challenges are identified and acted upon if required.

Regional MARAC Coordination continues with updates being received as a standing agenda item at meetings. A separate MARAC governance group has been convened under the DDALPB to ensure oversight whilst the MARAC process is reviewed and updated regionally.

Due to the increase in Domestic Homicide Reviews (DHRs), a DHR Governance Group has been convened which will not only form the core panel for any new DHRs but also have oversight of all DHR action plans. The group will work to monitor and identify themes arising across DHRs. The DA Service directory of services has been updated and uploaded onto the safe and sound website <u>https://www.dudleysafeandsound.org/domesticabuse</u>

Violence Against Women & Girls (VAWG) Strategic Group

The VAWG strategic group links with the DDALPB and acts as a forum to share data and intelligence on sexual assault and abuse, stalking, forced marriage and honour based abuse, agreeing any appropriate actions as necessary. This is intended to avoid such matters being lost within the wider partnership arrangements.

The groups action plan includes work around creating a positive culture within and across our organisations, Safer Spaces (Night Time Economy, Generic safety across the borough – safer spaces 24 hours a day, online) and Early Intervention / preventing offending and reducing reoffending/ targeting perpetrators. It links into the VAWG action plan.

A sexual assault and abuse service directory is in the process of being updated.

Violence Prevention Group

This group has been progressing work in relation to the Serious Violence Duty.

To that end it has undertaken of a serious violence needs assessment, which will be published, as per the Statutory requirement, by 31st January 2024. A strategy based on this needs assessment has also been developed and a plan to progress this strategy will follow.

Mapping of services has also taken place and can be found at <u>https://www.dudleysafeandsound.org/violence-prevention</u>

Dudley Combatting Drug and Alcohol Misuse Partnership (CDAP)

Dudley CDAP's work aims to improve the physical and mental health and wellbeing of some of the more vulnerable residents in Dudley. Helping to build resilience within individuals and communities to aid recovery after the misuse of substances. It also aims to understand and reduce the impact of substance misuse on the community.

The Substance Misuse Alliance and the Dudley Combating Drugs and Alcohol Partnership (Dudley CDAP) have merged.

The adult integrated substance misuse service and Dudley Integrated Health and Care have been working together to improve access to healthcare services for people using substances. The service has been able to make referrals to GP Integrated Care Team (ICT) meetings since Sep 2022 and have reported that this has been very valuable. During June-August there was a surge in nitazene adulterated heroin overdose deaths in the West Midlands. There was a very quick response from within DMBC teams and from local providers who put in place action plans, including additional naloxone supplies being purchased and provided to service users, and training for frontline staff.

Work is taking place to amend Dudley's Fentanyl action plan and reinvigorate our Local Drug Information System (including a system for different levels of alerts) and Drug Death Review Panel.

Adult in treatment numbers currently lower than expected; however, an action plan is in place to address this.

Modern Slavery Human Trafficking Strategic Group

This is a newly formed group which has met once.

Work has begun to establish the respective starting points of our individual services, identifying the data that we each hold and our current response, including any challenges and barriers faced.

The work of this group will link with the Safeguarding People Partnership exploitation subgroups and the regional Modern Slavery Board.

Rogue Landlord Operational Group

The role of the group is to provide a multi agency approach for tackling rogue landlords.

A landlord may be regarded as rogue where "a landlord knowingly flouts their obligations by renting out unsafe and substandard accommodation to tenants, many of whom may be vulnerable." They may also condone the immoral or illegal behaviour of their tenants through acts or omissions.

The group works together to highlight cases and to ensure a lead partner is identified to support the completion of any actions associated with each case, ensuring the right agency, with the appropriate powers, achieves the required outcome.

The Group now works to a RAG rating for Rogue Landlords, this supports the focus and the attention of the Group to assign and complete work in an effective manner.

Below is an overview of the differing bands:

Rating	Conditions for rating
Emergency case meeting	 Immediate risk to health & safety Urgent multi-agency action required Involving large numbers of people High profile Requested by a member of the group
Red	 Property is in a condition that may harm the occupants Protecting vulnerable or hard-to-reach tenants or occupants, including safeguarding concerns & referrals, harassment of occupants, subjected to modern slavery and exploitation A fire or fire safety concerns Illegal / retaliatory evictions Anti-social behaviour by the landlord or occupants Part of a Police operation or use of property for serious criminal activities Repeat offenders or multiple cases by a specific landlord – including previous offences / enforcement action, several complaints about them from tenants and neighbours, on the Government's Rogue Landlords Database Non-compliance with enforcement action
Amber	 Poor housing conditions or maintenance Poor management Overcrowding Property has pests, waste piled up outside or subjected to fly tipping Use of property for illegal activities Within Police impact areas of high crime or hotspots of rogue landlord activity Planning breaches Suspected unlicenced HMO HMO licensing contraventions Infringement of Building Regulations
Green	 Keep on the radar / monitoring Need a multi-agency approach to overcoming barriers to potential case resolution or benefit from shared intelligence

Prevent Delivery Group

The Board has clearly defined priorities and actions. At each meeting, we receive a Situational Assessment, so that we understand our current position, any emerging threats that may need mitigating action and review/agree our priorities.

A training needs analysis, as was highlighted by Ian Grundy (Home Office regional advisor) as 'best practice' has been carried out within the Partnership.

The Home Office draft Benchmarking Exercise received at the beginning of the year demonstrates the progress made by the partnership the highlights include:

Risk assessment process – improvement Effective multi-agency partnership board – improvement Partnership delivery plan – improvement Prevent referral process – improvement Channel Panel – same (4 out of 5) Problem-solving process – improvement Training programme – improvement Venue hire policy – same (at the desired level) Community engagement – same (at the desired level) Communications plan – we self-assessed as requiring improvement

Channel Panel

Channel forms a key part of Prevent and was placed on a statutory footing in 2015 through the Counter Terrorism and Security Act 2015 ("CT&S Act"). The process adopts a multi-agency approach to identifying and providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism, regardless of age, faith, ethnicity or background.

The CT&S Act is intended to secure effective local cooperation and delivery of Channel in all areas. In practice this means:

- local authorities will have a Channel panel in their area
- the local authority will provide the panel chair and deputy chair
- the panel will develop a support plan for individuals adopted as Channel cases
- where Channel is not appropriate, the panel will consider alternative forms of support, including health care and social care services
- the panel will ensure accurate records are kept detailing the support plan, agreed actions and decision-making, and outcomes
- all partners of a panel, as far as is appropriate and reasonably practicable, will cooperate with the police and the panel in the carrying out of their function

Section 38 of the CT&S Act places a duty to cooperate on all partners of a panel, as far as is appropriate and reasonably practicable, to assist the police and the panel in carrying out their functions under the CT&S Act.

The Dudley Channel Panel meets monthly through the year. The Chair of the Panel is the Director of Housing and Communities at DMBC, and the Deputy Chair is the Head of Safer Communities at DMBC, in line with the requirements of the CT&S Act.

Having reviewed the Annual Assurance Statement for 2022/23 in May, Panel Members identified 5 areas where a red rating was appropriate – these have all now been resolved.

Community Cohesion / Tension Monitoring Group (including Hate Crime) We believe that aligning the community cohesion tension monitoring group with the work of hate crime will bring additional benefits to the Safe and Sound Partnership whilst simplifying our partnership structure and driving engagement within our communities to build stronger, safer resilient and diverse communities across the borough.

Dudley has an ever-increasing diverse collection of communities that may face challenges due to migration, deprivation, and intergenerational discourse that could lead to rise in hate and damage the fabric of cohesion within the borough.

Evidence often shows that communal tensions lead to hate motivated antisocial behaviour in public spaces, hate crimes against individuals, families and employers. We also know that it can lead to a further breakdown in relationships with the Council, Police etc.

The priority action for the group is the refresh of the Community Cohesion and Hate Crime Strategy, which will be driven forward taking into account the proposed refresh of the group's terms of reference. It is anticipated that a forward workplan for the group will fall out of the strategy review.

Safer Places

Safer Places is a forum for partners to discuss cases that arise from public places or other locations where there have been high demand for service from police or other partners.

Cases that are suitable for safer places are those which the referring agency find too complex or challenging to resolve within their own problem-solving capability.

The Operating Procedure for Safer Places has been revised recently in an attempt to make the forum more action driven and outcome focused. The remit for cases has been widened.

Youth Justice Services (YJS) Management Board

The Youth Justice Service Management Board is also a Statutory Board in its own right. The Priorities agreed for the YJS for 2023/24 at a strategic level are:

- Prevention and Diversion
- Serious Violence
- Inclusion
- Think Family

The work of the YJS continues to contribute to positive outcomes for children by diverting them from the formal system wherever is possible and appropriate, and by offering interventions to reduce reoffending.

One of these interventions is the Turnaround programme. This programme enables us to work with children and families before issues they may be facing becomes entrenched, by offering them support with parenting and family matters, as well as the attempts being made to engage the individual child in positive activities. The YJS have also continued to engage in the educational landscape of Dudley, by attending schools and colleges across the borough, to educate children on areas of concern to us and our partners, such as anti-social behaviour, exploitation & knife crime.

The board ensure that feedback is obtained from pupils and professionals, with a view to using this to shape our offer going forward.

Latest data available from the Youth Justice Board notes progress against key data indicators including a significant reduction in First Time Entrants and the number of children in custody.

Domestic Homicide Reviews (DHRs)

18. The Community Safety Partnership has a statutory duty in respect of undertaking Domestic Homicide Reviews.

Since this duty began in April 2011, 12 notifications have been received by the partnership with 9 reaching the threshold for a review. 7 of these notifications have been received since 2020. 5 of the reviews that have proceeded have involved a suicide.

Funding for this statutory area of work is stretched.

Training

19. A range of training linked to the partnership priorities is available. Details can be found on the relevant 'helphub' topic pages: <u>https://www.dudleysafeandsound.org/help-hub</u>

Communications

20. The partnership share communications around our priority areas of work, including information about local services, how to access advice and regional and national campaigns throughout the year.

The communications plan includes the 'Working Together' campaign to promote the work of the partnership and provides for increased messaging at specific times of the year around certain topics (for example Hate Crime Week, Modern Slavery Day, Lighter Nights, Darker Nights, Christmas, sports tournaments, valentines day, Day of Remembrance etc). The safe and sound website is updated as appropriate and includes specific 'help hub' pages for a range of our topics where you will find information, advice and how to report: Visit: <u>https://www.dudleysafeandsound.org/help-hub</u>

The Partnership Domestic Abuse, Modern Slavery and Hate Crime posters and leaflets have been translated into 6 additional languages to ensure we do all we can to reach our communities.

Funding

21. The Partnership hold the 'Community Safety Fund' received from The Office of Police and Crime Commissioner (OPCC) each year.

In previous years this has been \pounds 135,000. The amount for 2024 / 2025 is yet to be confirmed.

The Community Safety Fund is used to progress work around the partnership priorities across a range of projects and quarterly returns are required by the OPCC on the use of this fund.

Projects funded in 2023 / 2024 include:

- The Sanctuary Service for those residents experiencing domestic abuse, allowing them to stay safely in their own home where appropriate.
- 'Reachable moments' in Russell's Hall Hospital peer advisors that support young people aged 11-25 admitted to A&E due to violence, abuse or exploitation.
- Victim Support Service for residents experiencing ASB.
- Life in Lye a community cohesion project empowering local people to be leaders of positive change.
- Dedicated CAPA support for the partnership to ensure relevant and timely communications are shared across the borough in line with the communications plan as outlined above, but also where a reactive response is required, in addition to the upkeep and development of the partnership website.

The Partnership have an allocation of $\pounds 15,000$ from the OPCC per year to conduct Domestic Homicide Reviews. With the recent increase of reviews and the increase of the cost of DHRs (regionally the average cost per review is $\pounds 9688.07$) there will be a short fall in this funding in coming years.

The Domestic Abuse 'New Burdens Fund' is allocated to each Local Authority by The Department for Levelling Up, Housing and Communities in response to the Domestic Abuse Act 2021, in order to support Local Authorities with their duties in respect of the Act. This fund is strictly ringfenced to provide support to those victims and their children who are residing in safe accommodation and is being used to fund specialist support in refuge, dedicated posts within the housing directorate, a specialist children's support service and training packages.

Funding is also received via the Violence Reduction Partnership in respect of the Serious Violence Duty / Violence Prevention. In 2023 / 2024 this is \pounds 44580,79 and has been used to fund a range of projects in relation to reducing and preventing Youth Violence.

Anti-social behaviour and neighbour disputes

22. The restructure of housing services to deliver the community housing vision, as set out in the report to Housing and Public Realm Scrutiny Committee on 21st September 2022, is now complete. During 2023/24 the ASB team moved from the Community Housing area of the Directorate and now sits within Safer Communities, a wider service area which comprises of homelessness services, traveller site and enforcement work, resettlement and inclusion, and community safety. The move aims to bring together the work across these overlapping service areas and improve relationships and information sharing with key partners.

It is hoped that by utilising the wider staff resources of this larger team and the information held within the service area it will help us to look at how we can expand the current remit of the service to deal with anti-social behaviour and nuisance in the community as well as within our homes.

This work will link in, where appropriate, with the work of the Community Safety Team in relation to Public Space Protection Orders (PSPOs) and will be the base for the new street officer team, a team of 4 officers working across Dudley's hotspot areas to prevent, disperse and enforce against ASB.

During 2023 the anti-social behaviour team has worked to clear the backlog of cases within the service area, and to respond to feedback on the services delivered by the team. Up until September 2023 the team continued to struggle due to low staff resources caused by sickness absence and vacant posts but following recruitment the team is now starting to move on to a more stable footing.

The team have begun to develop and improve service delivery. A revised policy is in place and a new working procedure is in progress that we hope will improve service delivery.

IT has been an issue, with data quality issues identified, and so in response, procurement is underway for a new case management system.

- 23 Over the first three months of the financial year 23/24 the anti-social behaviour and community housing teams have worked together and have developed and agreed the new model for managing anti-social behaviour and neighbour nuisance, with community housing officers dealing with day to day issues on their estates, and the anti-social behaviour officers picking up and managing more complex/higher risk cases.
- 24. There are many benefits to this approach including, but not limited to:
 - Community Housing Officers being able to deal more quickly with issues as they arise on their patches, using their knowledge of the area and relationships with residents to try and deal with potential issues before they escalate into something more difficult to manage.
 - Trained Anti-Social Behaviour Officers having more time and resources to case manage more complex cases, ensuring that all evidence required to pursue any legal remedies is gathered and cases are progressed in a robust and timely manner.
- 25. The ASB service has secured a set number of hours of advice from an external, independent ASB expert. These hours have been used to undertake independent case reviews in particularly complex cases, to provide advice and training to the team, and to advise on any changes in policy and practice which would improve or enhance service delivery and outcomes.

Training for both the ASB team and Community Housing Officers continues into the new year.

26. Case reviews (formerly known as the Community Trigger).

Significant work has been undertaken throughout 2023 to update and amend the case review process. This has led to improvements in data capture and information on our websites has been revised to reflect the new terminology of ASB Case Reviews.

We have seen a minor uplift in ASB Case Reviews this year, we believe this is because of publicity around the ASB legislation from the government and from additional publicity.

<u>Finance</u>

27. There are no financial implications arising directly from this report. However, there are potential financial implications arising in respect of the short fall for funding of Domestic Homicide Reviews, as DMBC are a statutory partner in the Community safety Partnership.

<u>Law</u>

28. Safe and Sound (Dudley's Community Safety Partnership) must meet the requirements set out by the Crime and Disorder Act 1998 and its subsequent amendments.

Other legislation that applies to Safe and Sound includes:

- Domestic Violence Crime and Victims Act 2004 (Section 9 Domestic Homicide Reviews)
- Police and Justice Act 2006
- Police Reform and Social Responsibility Act 2011
- Health and Social Care Act 2012
- Counter Terrorism and Security Act 2015
- Modern Slavery Act 2015
- Domestic Abuse Act 2021

Risk Management

29. There are no material risks arising directly from this report. Any risks identified relating to the subject areas falling under the remit of Safe and Sound are recorded, managed and reported upon through the relevant directorate and/or partners risk register.

Equality Impact

- 30. There are no equality impact implications arising directly from this report. However, there are differential impacts on individuals, families, and communities in respect of issues that Safe and Sound seeks to address. This needs to be borne in mind when planning and delivering work and services.
- 31. Communities, including young people, have been consulted with to inform the priorities of the Safe and Sound Community Safety Partnership.
- 32. Work undertaken by Safe and Sound will have a positive effect on children and young people who may be affected by the issues that the Partnership seeks to address.

Human Resources/Organisational Development

33. Whilst this report does not have any immediate organisational development/HR or transformational implications, it is important to build the confidence and knowledge of the workforce in respect of a range of issues covered in this report relating to the community safety agenda.

Commercial/Procurement

34. There are no commercial or procurement implications arising directly from this report.

Environment/Climate Change

35. There are no environmental implications arising directly from this report.

Council Priorities and Projects

- 36. The work of the Safe and Sound Community Safety Partnership supports the following key priority areas with the Council Plan:
 - Dudley the Safe and Healthy Borough Residents live in safe communities where safeguarding of vulnerable people of all ages protects them from harm and supports the prevention of crime and exploitation.
 - Dudley Borough the Destination of Choice A place of healthy, resilient, safe communities where people have high aspirations and the ability to shape their own future.

K. Jose

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Appendices

• Appendix 1 – Safe and Sound Structure Chart October 2023