

INFRASTRUCTURE SERVICES COMMITTEE – 8 JUNE 2022

PARTNERSHIP REVIEW: HEALTH AND TRANSPORT ACTION PLAN (HTAP) AND ROAD SAFETY NORTH EAST SCOTLAND (RSNES)

1 Executive Summary/Recommendations

1.1 As part of the Partnership Working Policy, the Committee is being asked to approve Aberdeenshire's involvement in two partnerships, the Grampian Health and Transport Action Plan (HTAP) and Road Safety North East Scotland (RSNES) until June 2024 at which point they will be reviewed again.

1.1.1 The detail of the partnership assessment and associated risk assessment can be found in the appendices, however both partnerships are able to demonstrate that they are effective at bringing different organisations together to achieve shared aims and objectives and that our involvement in both are low risk.

1.2 The Committee is recommended to:

1.2.1 Consider and endorse the partnership reviews of the Grampian Health and Transport Action Plan (HTAP) and Road Safety North East Scotland (RSNES) as set out in Appendices 1 to 4 of this report; and

1.2.2 Agree that the Council continue to participate in the partnerships until June 2024, where they will be reviewed again in line the Partnership Working Policy.

2 Decision Making Route

2.1 Aberdeenshire Council's Partnership Working Policy requires that a short partnership assessment and a short risk assessment must be undertaken before joining a partnership and every two years thereafter.

2.2 Infrastructure Service Committee agreed to continue to participate in both partnerships at its meeting of 23 January 2020 (item 7 refers) and both partnerships are due to be reviewed again in line with the Partnership Working Policy.

3 Discussion

3.1 Council participation in both the HTAP and RSNES partnerships are important to facilitate partnership working in Aberdeenshire and to ensure effective use of resource and funding to achieve common outcomes while eliminating duplication. This report asks Committee to consider and endorse the partnership assessment and risk assessment set out at **Appendices 1 to 4** for HTAP and RSNES.

- 3.2 The Grampian HTAP is a partnership comprising of health and transport professionals across the Moray, Aberdeen City and Aberdeenshire authority areas. HTAP was first adopted in 2008 and refreshed in 2014. The Plan has two main themes – Transport and Public Health and Access to Health and Social Care.
- 3.3 The vision for the Transport and Public Health Sub Group is:
- For people in Grampian to choose to travel by active modes such as walking and cycling whenever appropriate and to have the ability to do so conveniently and safely, in order to improve activity levels and public health; and
 - For everyone in the region to live without unacceptable risk to their health caused by the transport network or its use.
- 3.4 The vision for the Access to Health and Social Care Sub Group is:
- For everyone in the region to be able to access the health and social care they need and if transport is required for this to be appropriate, convenient and affordable; and
 - For the environmental impacts of journeys to be minimised.
- 3.5 The HTAP document (https://www.nestrans.org.uk/wp-content/uploads/2017/02/HTAP_refresh_final.pdf) contains the detailed objectives for each Sub Group. It is worth noting that the recently adopted National Transport Strategy (NTS) recognises the links between transport and health and national work is underway to take forward an approach that mirrors that taken in the North East of Scotland.
- 3.6 Through RSNEs, Aberdeenshire Council work in partnership with Moray Council, Aberdeen City Council, Nestrans, NHS Grampian, the North Safety Camera Unit, Police Scotland and the Scottish Fire and Rescue Service to deliver the outcomes in the North East Scotland Casualty Reduction Strategy.
- 3.7 The RSNEs partnership shares and promotes general road safety information and advice beneficial to local road users, which may impact on road safety. It also shares statistical information about casualty trends in the North East, national and local road safety initiatives or campaigns operated by the partners, as well as seasonal road safety guidance to coordinate activities that aim to make our roads safer. The national Road Safety Framework for Scotland recognises the approach taken in this area as an exemplar.
- 4 Council Priorities, Implications and Risk**
- 4.1 The report helps to deliver the Strategic Priority “Health and Wellbeing” within the pillar “Our People”.

4.2 The report helps to deliver the Strategic Priority “Infrastructure” within the pillar “Our Environment”.

4.3 The table below shows whether risks and implications apply if the recommendations are agreed.

Subject	Yes	No	N/A
Financial		X	
Staffing	X		
Equalities and Fairer Duty Scotland		X	
Children and Young People’s Rights and Wellbeing		X	
Climate Change and Sustainability		X	
Health and Wellbeing		X	
Town Centre First		X	

4.4 Aberdeenshire Council currently employ and host the Coordinator post for both the HTAP and RSNES partnerships. The full time HTAP Coordinator post is fully funded, equally by Nestrans and the NHS. The part time (0.6 Full Time Equivalent) RSNES Coordinator post is funded by Aberdeenshire Council.

4.5 There are no direct financial implications to the Council, other than the staffing costs described in 4.4. Projects and initiatives that may be carried out as part of the partnerships are activities that the Council would participate in to achieve the Council’s own outcomes and Priorities. Participation in these partnerships allow alignment of resources and expenditure to achieve common outcomes.

4.6 The screening section as part of Stage One of the Integrated Impact Assessment process has not identified the requirement for any further detailed assessments to be undertaken. Individual actions and interventions arising from work within the partnerships will be subject to equality impact assessments where required.

4.7 The following Risks have been identified as relevant to this matter on a [Corporate Level](#):

- ACORP001 - Budget Pressures - Participating in any partnership requires allocation of resource. Neither partnerships have a requirement to provide a minimal funding level and therefore this risk can be managed through normal budget monitoring processes.
- ACORP005 - Working with other organisations (e.g. supply chains, outsourcing, partnership working and commercialisation) – Participating in partnerships requires working with other organisations and relying on actions being progressed where the Council has limited or no control over the outcome. This risk can be managed through effective governance processes that are evident in both HTAP and RSNES.

- ACORP006 - Reputation management – Withdrawing from high profile partnerships can have a negative impact on the Council's reputation. The recommendation of this report is to continue to participate in both partnerships.

4.8 The following risks have been identified as relevant to this matter on a [Strategic Level](#):

- ISSR001 – Active Travel – Both partnerships assist the Council in delivering the key actions and priority in relation to Active Travel.

5 Scheme of Governance

- 5.1 The Head of Finance and Monitoring Officer within Business Services have been consulted in the preparation of this report and their comments are incorporated within the report and are satisfied that the report complies with the Scheme of Governance and relevant legislation.
- 5.2 The Committee are able to consider this item in terms of Section F1.1f of the List of Committee Powers in Part 2A of the Scheme of Governance as this relates to policy issues and resource matters relating to Transportation.

Alan Wood
Director of Environment and Infrastructure Services

Report prepared by Martin Hall, Strategy Manager
25 May 2022

List of Appendices –

- Appendix 1 Partnership Assessment, Road Safety North East Scotland
- Appendix 2 Risk Assessment, Road Safety North East Scotland
- Appendix 3 Partnership Assessment, Grampian Health and Transport Action Plan
- Appendix 4 Risk Assessment, Grampian Health and Transport Action Plan

Start Up Assessment

Appendix 1

Partnership Working Policy - Partnership Assessment - **Road Safety North East Scotland**

This should be completed every two years as per the terms of the Partnership Working Policy.

This information will be presented to the relevant Policy Committee to inform its decision on membership of the partnership

Areas for consideration	Assessment	Comment/Proposed Action
Is the partnership a statutory partnership?	No ▼	There is no statutory requirement for the partnership and the membership comprises of a range of organisations with an interest in/involvement with road safety and road casualty reduction.
If yes, please state the legislation in the comment box. (Please continue to go through the assessment for best practice purposes, rather than to assess whether there should be participation in the partnership).		
The partnership has set outcomes or objectives to be achieved	Yes ▼	RSNES works towards achievement of the actions within the North East Scotland Road Casualty Reduction Strategy. These actions have recently been reviewed in 2021 as part of a refresh following the adoption of a new national road safety framework. Overarching national road casualty reduction targets also exist which Road Safety North East Scotland (RSNES) works towards.
The partnership's aims and any commitment of budget fit with the Council's Strategic Plan and Priorities (http://www.aberdeenshire.gov.uk/council-and-democracy/council-plan)	Yes ▼	Clear linkages through the Our People (Health and Wellbeing) and Our Environment (Infrastructure) pillars.

Start Up Assessment

Areas for consideration	Assessment	Comment/Proposed Action
If yes or partly, please specify which priorities in the comment box		The Strategic Plan specifically refers to developing 'real partnership working' and RSNES can provide evidence of several recent examples of such work, e.g. with Police Scotland and Robert Gordon University. It is, of course, not a perfect environment and examples remain of missed opportunities by partners who do not engage and potentially benefit from wider partnership working. A specific Council Priority is "A road and street-lighting network which keeps people safe, encourages active lifestyles and increases active travel opportunities" as well as "It's easy and safe to move around local areas using good-quality active travel routes, streets and roads"
The partnership follows the Account Commission's Code on Following the Public Pound/financial regulations and agrees appropriate arrangements for allocating start-up and running costs (http://www.audit-scotland.gov.uk/uploads/docs/report/2004/nr_040311_following_public_pound.pdf)	N/A ▼	No start-up or running costs were/are incurred.
The partnership makes links to the CPP's Local Outcomes Improvement Plan priorities where relevant (http://www.ouraberdeenshire.org.uk/our-priorities/local-outcomes-improvement-plan/)	No ▼	Road safety and casualty reduction is not directly mentioned in the current iteration of the LOIP, however, these issues can be broadly linked with the transport priority in seeking to 'create the best transport links across communities.'
All other appropriate bodies have been invited to participate in this partnership	Yes ▼	The nature of the partnership means that on occasions, other organisations can be asked to participate in partnership work and can be considered as a 'temporary member' to undertake specific work, e.g. Robert Gordon University.
The partnership ensures equality of opportunity for all and complies with statutory duties (equalities, socio-economic, town centres first principle) as required	N/A ▼	Given that most road safety related work is performed by individual RSNES partner organisations, the relevant duties and statutory duties will be the responsibility of the appropriate partner.
The partnership has a document such as an agreement, remit or memorandum of association to define its role, powers and how it carries out its business	Yes ▼	The North East Scotland Road Casualty Reduction Strategy (2021-2030) details the operating practices within RSNES.

Start Up Assessment

Areas for consideration	Assessment	Comment/Proposed Action
The partnership makes a formal annual report that includes annual accounts and performance to its members and other bodies if necessary	Partly ▼	RSNES has recently started annual performance reporting to the 'Leaders Group for Public Protection', which comprises of the Chief Executives/Senior Officers of the 3 North East Local Authorities, Police Scotland, Scottish Fire and Rescue Service and NHS Grampian. As RSNES has no specific budget or expenditure, no accounts are produced.
Appropriate status and voting rights are accorded to the council in the partnership	N/A ▼	Decision making/voting rights do not form part of the business of the group, which is based more upon the output and performance of individual organisations operating in the field of road safety.
Members of the partnership's top-level decision-making group can be recalled by their nominating bodies	Yes ▼	A partner organisation can nominate/withdraw a member as it deems necessary.
The risks faced by the partnership are shared between partners	Partly ▼	The local authorities retain the statutory responsibility for road safety and therefore, the primary risk associated with road safety remains with them.
Routine sharing of personal data will take place within the partnership	No ▼	The more strategic and generalised nature of RSNES work means personal data is not shared.
If yes or partly, please consider if a Data Privacy Impact Assessment, an Information Sharing Agreement or a Privacy Notice is required. All guidance and templates can be found at this link https://aberdeenshire.sharepoint.com/sites/Arcadia/services/Pages/Business%20Services/ICT/Information%20Management%20and%20Record%20Management/Data%20Protection/Data%20Protection.aspx		
The partnership has a complaints process or agrees to adopt the complaints process of a member organisation	No ▼	Given the limited work undertaken by RSNES on its own account, any complaint would likely follow the procedures maintained by the relevant partner who is the lead agency for the aspect of work subject of complaint.
Meetings of the partnership's top-level decision-making group are open to the public	No ▼	

Start Up Assessment

Areas for consideration	Assessment	Comment/Proposed Action
The public is entitled to see reports considered by the partnership's top-level decision-making group	Partly <input type="text"/>	Reports usually relate to open source data with no restrictions applying. Occasionally, restricted information concerning specific road based incidents or enforcement approaches may be discussed between partners which would be unsuitable for public consumption.
Minutes of the partnership's meetings are made publicly available	No <input type="text"/>	
The partnership's top-level decision-making group has a quorum for meetings	No <input type="text"/>	RSNES does not operate with a quorum and it is not felt necessary to require one given the nature of the work undertaken.
Members of the partnership's top-level decision-making group are appointed for a limited period of time	No <input type="text"/>	Members of the Lead Officers Group are based upon the specific role they hold in the partner organisation, which normally directly links to road casualty reduction.
There are agreed arrangements for dissolving the partnership	No <input type="text"/>	
There are clear arrangements for the Council to exit the partnership	No <input type="text"/>	
There is a procedure for ensuring members who declare conflicts of interest take no part in decision	No <input type="text"/>	Limited decision making occurs and this is not considered an issue.
The partnership recognises the obligations placed on Elected Members due to the Code of Conduct and has a procedure for ensuring members who declare conflicts of interest take no part in decision.	N/A <input type="text"/>	No elected members form part of the group.
Cost / Benefit Analysis	Response	
Please detail the staffing and financial implications of running the partnership, including those on other council services and partners	The only staffing and financial implication is the Council's hosting and funding of the Road Casualty Reduction Strategy Coordinator post.	
Please state the source of any funding received by the partnership	None, it is run without being directly funded. On occasions, RSNES will instigate local road safety initiatives which incur a financial outlay, however, the costs of these are usually absorbed by the partner organisation supporting the approach (e.g. NESTRANS)	

Start Up Assessment

Areas for consideration	Assessment	Comment/Proposed Action
Please describe the benefits of Council participating in the partnership		Aberdeenshire, because of its size and the extent of its road network, statistically sustains the highest number of road collisions and casualties across North East Scotland. Accordingly, it makes sense for Aberdeenshire Council to be at the forefront of road casualty reduction activities among the 3 north east local authorities.
The partnership is sustainable and is the best way of achieving its aims and outcomes	Yes <input type="button" value="▼"/>	

Partnership Working Procedure - Risk Assessment

This should be completed every two years as per the terms of the Partnership Working Policy.

This helps determine if the partnership presents a "significant" risk to the Council and what steps require to be taken if that is the case.

Partnership Name:	Completed by:	Date:
Road Safety North East Scotland	Martin Hall	27/04/2022

All partnerships must be recorded in the Register of Partnerships on Arcadia

This table assesses whether your partnership should be recorded as a **significant** partnership requiring a Risk Register (from the Risk Management Team).

Please enter the score in the last column for the statement which most closely represents your partnership.

Impact No.	Description	Minor (Score 1)	Important (Score 2)	Significant (Score 3)	Major (Score 4)	Score
1	The Council contributes to the partnership by direct funding and/or indirectly through staff resources, work done etc.)	< £10K per annum	£10K to < £50 k per annum	£50K to < £100k per annum	> £100k per annum	2
2	The partnership's success is critical to the achievement of one or more of the Council's Strategic Priorities.	Not directly linked to a strategic priority (this needs to be flagged up to the policy Committee in this case).	Linked to a strategic priority.	Significant contributor to success of a strategic priority.	Essential to the achievement of a strategic priority.	2
3	Failure of the partnership would have an impact on the Council's reputation.	Threat of adverse comment in local press or the equivalent that Corporate Communications consider to be of material concern to the Council.	Actual adverse comment in local press or the equivalent that Corporate Communications consider to be of material concern to the Council.	Individual press reports in national media that Corporate Communications consider being of material concern to the Council.	Concerted, widespread or recurrent critical coverage of the Council or for a specific event in the media.	1

Impact No.	Description	Minor (Score 1)	Important (Score 2)	Significant (Score 3)	Major (Score 4)	Score
4	The extent to which partnership expenditure is controlled by the Council.	The Council has full control over expenditure decisions.	The Council has veto on expenditure decisions.	The Council is a party to expenditure decisions.	The Council has no control over expenditure.	3
5	The partnership takes decisions on behalf of or which are binding on the Council.	The Partnership does not take decisions on behalf of the Council	The Partnership does not take decisions on behalf of the Council but representatives with decision-making authority attend the partnership and consider and influence its recommendations.	The Partnership does not take decisions on behalf of the Council but representatives with decision-making authority attend the partnership and agree to be bound by its decisions.	The partnership has decision-making responsibilities directly delegated to it from the Council.	2
6	The Council has set up the partnership in order to receive additional funding and/or meet Statutory or Regulatory requirement.	Not required by law or to receive funding.	Indirect or limited links to successful achievement of funding.	Direct links to successful achievement of funding.	The Council is required to participate in this partnership by law or to receive specific funding.	1

Total Score

Maximum Possible Score

Impact %

Evaluation

11

24

45.83%

Not Significant

Start-Up Assessment

Appendix 3

Partnership Working Policy - Partnership Assessment - **Health and Transport Action Plan**

This should be completed every two years as per the terms of the Partnership Working Policy.

This information will be presented to the relevant policy committee to inform its decision on membership of the partnership

Areas for consideration	Assessment	Comment/Proposed Action
Is the partnership a statutory partnership?	No <input type="button" value="v"/>	
If yes, please state the legislation in the comment box. (Please continue to go through the assessment for best practice purposes, rather than to assess whether there should be participation in the partnership).		
The partnership has set outcomes or objectives to be achieved	Yes <input type="button" value="v"/>	As well as the main Health and Transport Action Plan (HTAP) document, two sub groups with specific action plans exist.
The partnership's aims and any commitment of budget fit with the Council's Strategic Plan and Priorities (http://www.aberdeenshire.gov.uk/council-and-democracy/council-plan)	Yes <input type="button" value="v"/>	There are clear linkages to the Our People Pillar (Health and Wellbeing)
If yes or partly, please specify which priorities in the comment box		People are supported to live healthy active lifestyles focused on Live Life Outdoors, Live Life Well and Live Life at home.
The partnership follows the Account Commission's Code on Following the Public Pound/financial regulations and agrees appropriate arrangements for allocating start-up and running costs (http://www.audit-scotland.gov.uk/uploads/docs/report/2004/nr_040311_following_public_pound.pdf)	N/A <input type="button" value="v"/>	
The partnership makes links to the CPP's Local Outcomes Improvement Plan priorities where relevant (http://www.ouraberdeenshire.org.uk/our-priorities/local-outcomes-improvement-plan/)	Yes <input type="button" value="v"/>	HTAP partners represent 3 local authority areas and refer to the priorities of the three Community Planning Partnerships.
All other appropriate bodies have been invited to participate in this partnership	Yes <input type="button" value="v"/>	

Start-Up Assessment

Areas for consideration	Assessment	Comment/Proposed Action
The partnership ensures equality of opportunity for all and complies with statutory duties (equalities, socio-economic, town centres first principle) as required	Yes <input type="checkbox"/>	
The partnership has a document such as an agreement, remit or memorandum of association to define its role, powers and how it carries out its business	Yes <input type="checkbox"/>	The partnership has a formal constitution which includes details on roles, powers and how business is carried out.
The partnership makes a formal annual report that includes annual accounts and performance to its members and other bodies if necessary	Yes <input type="checkbox"/>	https://www.nestrans.org.uk/projects/travel-awareness/documents-travel-awareness/
Appropriate status and voting rights are accorded to the Council in the partnership	N/A <input type="checkbox"/>	The Steering Group and 2 HTAP Sub Groups do not typically operate on a voting basis.
Members of the partnership's top-level decision-making group can be recalled by their nominating bodies	Yes <input type="checkbox"/>	
The risks faced by the partnership are shared between partners	Yes <input type="checkbox"/>	
Routine sharing of personal data will take place within the partnership	No <input type="checkbox"/>	
If yes or partly, please consider if a Data Privacy Impact Assessment, an Information Sharing Agreement or a Privacy Notice is required. All guidance and templates can be found at this link https://aberdeenshire.sharepoint.com/sites/Arcadia/services/Pages/Business%20Services/ICT/Information%20Management%20and%20Record%20Management/Data%20Protection/Data%20Protection.aspx		
The partnership has a complaints process or agrees to adopt the complaints process of a member organisation	Yes <input type="checkbox"/>	
Meetings of the partnership's top-level decision-making group are open to the public	Yes <input type="checkbox"/>	The HTAP Steering Group has a Public Representative with access to all information.
The public is entitled to see reports considered by the partnership's top-level decision-making group	Yes <input type="checkbox"/>	Minutes of the HTAP Steering Group go to the Nestrans Board.
Minutes of the partnership's meetings are made publicly available	Yes <input type="checkbox"/>	

Start-Up Assessment

Areas for consideration	Assessment	Comment/Proposed Action
The partnership's top-level decision-making group has a quorum for meetings	No <input type="text"/>	The partnership has a formal constitution which includes details the quorum required for a meeting.
Members of the partnership's top-level decision-making group are appointed for a limited period of time	No <input type="text"/>	
There are agreed arrangements for dissolving the partnership	No <input type="text"/>	The partnership has a formal constitution. There are no agreed arrangements for dissolving the partnership however partner organisations can withdraw from the partnership following their own governance arrangements.
There are clear arrangements for the Council to exit the partnership	Yes <input type="text"/>	
There is a procedure for ensuring members who declare conflicts of interest take no part in decision	N/A <input type="text"/>	
The partnership recognises the obligations placed on Elected Members due to the Code of Conduct and has a procedure for ensuring members who declare conflicts of interest take no part in decision.	N/A <input type="text"/>	
Cost / Benefit Analysis	Response	
Please detail the staffing and financial implications of running the partnership, including those on other Council services and partners	The HTAP Programme Manager post is jointly funded by NHSG and Nestrans, employed through Aberdeenshire Council.	
Please state the source of any funding received by the partnership	As above. THInC (Transport to Healthcare Information Centre) is funded by Nestrans, NHSG, Aberdeen City Council and Aberdeenshire Council. It is delivered through Aberdeenshire Council.	
Please describe the benefits of Council participating in the partnership	Greater understanding of "health miles," access issues, equalities issues relating to transport, public health and the opportunity to strategically influence partnership working existing across health and transport issues, including, road safety, air quality, social isolation etc.	
The partnership is sustainable and is the best way of achieving its aims and outcomes	Yes <input type="text"/>	

Partnership Working Procedure - Risk Assessment

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This helps determine if the partnership presents a "significant" risk to the Council and what steps require to be taken if that is the case.

Partnership Name:	Completed by:	Date:
Grampian Health & Transport Action Plan	Martin Hall	27/04/2022

All partnerships must be recorded in the Register of Partnerships on Arcadia

This table assesses whether your partnership should be recorded as a **significant** partnership requiring a Risk Register (from the Risk Manage

Please enter the score in the last column for the statement which most closely represents your partnership.

Impact No.	Description	Minor (Score 1)	Important (Score 2)	Significant (Score 3)	Major (Score 4)	Score
1	The Council contributes to the partnership by direct funding and/or indirectly through staff resources, work done etc.)	< £10K per annum	£10K to < £50 k per annum	£50K to < £100k per annum	> £100k per annum	1
2	The partnership's success is critical to the achievement of one or more of the Council's Strategic Priorities.	Not directly linked to a strategic priority (this needs to be flagged up to the policy Committee in this case).	Linked to a strategic priority.	Significant contributor to success of a strategic priority.	Essential to the achievement of a strategic priority.	3
3	Failure of the partnership would have an impact on the Council's reputation.	Threat of adverse comment in local press or the equivalent that Corporate Communications consider to be of material concern to the Council.	Actual adverse comment in local press or the equivalent that Corporate Communications consider to be of material concern to the Council.	Individual press reports in national media that Corporate Communications consider being of material concern to the Council.	Concerted, widespread or recurrent critical coverage of the Council or for a specific event in the media.	1

Impact No.	Description	Minor (Score 1)	Important (Score 2)	Significant (Score 3)	Major (Score 4)	Score
4	The extent to which partnership expenditure is controlled by the Council.	The Council has full control over expenditure decisions.	The Council has veto on expenditure decisions.	The Council is a party to expenditure decisions.	The Council has no control over expenditure.	1
5	The partnership takes decisions on behalf of or which are binding on the Council.	The Partnership does not take decisions on behalf of the Council	The Partnership does not take decisions on behalf of the Council but representatives with decision-making authority attend the partnership and consider and influence its recommendations.	The Partnership does not take decisions on behalf of the Council but representatives with decision-making authority attend the partnership and agree to be bound by its decisions.	The partnership has decision-making responsibilities directly delegated to it from the Council.	2
6	The Council has set up the partnership in order to receive additional funding and/or meet Statutory or Regulatory requirement.	Not required by law or to receive funding.	Indirect or limited links to successful achievement of funding.	Direct links to successful achievement of funding.	The Council is required to participate in this partnership by law or to receive specific funding.	1

Total Score	9
Maximum Possible Score	24
Impact % Evaluation	37.50%

Not Significant