

EQUALITY IMPACT ASSESSMENT



Workforce Reform – Station Retail & Multi-Skilling – Dewsbury Station

Department of Sustainability

31/08/2023

Draft – Subject To Consultation

TPE-EQIA-2023-002

Version	Author/Amender	Date
1	Accessibility & Transport Integration Manager	21/04/2022
2	Accessibility & Transport Integration Manager	02/07/2023
3	Accessibility & Transport Integration Manager	14/07/2023
4	Accessibility & Transport Integration Manager	31/08/2023

1. Project/Change Scope

Summary of Project

TransPennine Express's ("TPE's") vision is to support the implementation of a modern retailing service for customers that in line with consumer expectations utilising the full extent of digital retailing capabilities and, in turn, enhances our overall retailing experience. We will make use of the latest technology and digital capabilities available to us for the transacting of tickets and products, whilst continuing to provide accessible retailing for those who need it.

We will also improve our station experience by bringing our station workforce from behind the ticket office window closer to the customer, increasing the level of customer contact. We will identify opportunities to expand multiskilling to enable our station workforce to deliver a range of duties that directly benefit customers, such as assistance, information, wayfinding and monitoring the availability and condition of facilities throughout the station. Our station teams will be empowered to support any customer with any issue and receive the appropriate training and equipment to do so.

To enable this, we will carry out meaningful consultation with our employees, customers, and stakeholders on our proposals:

We will consult with our customers and stakeholders on the closure of 14 ticket offices. We will also consult on keeping our two busiest ticket offices at Manchester Airport and Huddersfield, which account for around 40% of all transactions at TPE ticket Offices, open but with proposed changes to their opening times – while we plan to close these ticket offices in time, their closure will be subject to a further, separate round of public consultation. For clarity, this EqIA will take into consideration the impacts and mitigations of the closure of all 16 ticket offices. Consultation on ticket office closures will be conducted under the statutory Ticketing and Settlement Agreement ("TSA") Major Change process.

Further, we will consult with our employees on making our stations workforce multiskilled. Employee consultation will commence at the same time as the public consultation and be delivered in line with our internal policies, procedures, and agreements.

Implementation of our proposals is subject to undergoing these meaningful consultation processes.

On that basis, **this Equality Impact Assessment will be deemed a live document that may be adapted or revised at the appropriate time to reflect any changes or further considerations that may need to be considered following the conclusion of meaningful consultation with our customers, employees, and stakeholders.**

Proposal and Justification

Station Retail

We propose to close our 16 ticket offices permanently. We plan to do this in a phased approach that will see 14 ticket offices close as part of the first phase, subject to consultation. We will retain ticket offices at Manchester Airport and Huddersfield for up to 18 months but operate with one window and reduce the hours to the equivalent of one shift per day, and then, subject to a separate round of consultation, close them permanently. . This will also see our current staffing hours at 9 stations reduce by the equivalent of two shifts a day to one. We will retain a ticket office machine ("TOM") at all 16 stations to enable us to continue

transacting Unusual Products (“UPs”), which are tickets and products that can only be sold at a ticket office currently. This change will mean customers who previously bought their ticket at a ticket office can now do so via a digital retailing channel or other third-party retailer, thus encouraging the modernisation of our station and retailing experience.

Multiskilling

A portion of station employees will map into a new multiskilled role. This will bring them in front of the ticket office window, moving closer to the customer by being present on platforms, concourse, and other customer footfall areas of the station. Therefore, customers will experience a more visible staff presence at stations during the times that the locations are set to be staffed. This has the benefit of giving customers who have a range of needs more immediate and proactive access to support from our station employees, for example, with Passenger Assists.

Customers who previously used a ticket office to purchase their ticket will continue to be able to make a purchase at the station via a Ticket Vending Machine (“TVM”). Our station employees will be there to support any customer who wishes to make use of these facilities; in turn, this will promote independent travel.

Location

Changes as part of this programme are taking place network-wide, but this Equality Impact Assessment refers only to changes affecting **Dewsbury railway station**.

Timescale

The progression of these proposals to implementation stage will be subject to a period meaningful consultation with our employees, customers, and stakeholders. It is anticipated that formal consultation will commence from July 2023. In the longer term, subject to consultation, we expect our plans will be implemented in full by March 2025.

2. Evidence

Current Business Practices

The current staffing times for Dewsbury station are Monday to Friday 06:00 – 20:00, Saturday 06:00 – 20:00 and Sunday 07:15 – 19:45.

Policies, Procedures and Requirements

This station is not staffed for all hours of train service operation. As a result, in line with TPE’s Accessible Travel Policy (“ATP”), assistance outside of staffed hours to board and alight from trains is provided by the Conductor. All trains serving this station have a Conductor.

Customers requiring further assistance through the station outside of station staffed hours are provided with an accessible taxi free of charge to the nearest station accessible to them (usually Huddersfield when travelling eastbound, or Leeds when travelling westbound).

The table below outlines some of the facilities available at this station:

Facilities	Comments
Ticket Office	In the financial year 2022-2023, 14% of transactions for journeys to/from Dewsbury were made at the ticket office. There were 105,670 ticket transactions at this station, equivalent to 290 per day. 80,754 of those were made using the ticket office (76%). At the ticket office, 54% of transactions were paid using card, 45% using cash, and 0% using a rail warrant.
Ticket Machines	The station has four ticket vending machines, all of which accept card payment. One machine also accepts cash payment. In the financial year 2022-2023, there were 24,916 transactions made using these machines, equivalent to 68 transactions per day (24% of the station's total transactions).
Step-free Access	The station has lifts to all platforms. Step-free access can also be gained to platform 2 (trains towards Huddersfield and Manchester) without the use of a lift, but only when entering the station from the main entrance.
Toilets	There are male and female standard toilet facilities available at this station as well as an accessible Changing Places facility.
Waiting Rooms	There are waiting rooms available at this station during staffed hours. There is also outdoor seating available at all times.
CCTV	CCTV is in operation at this station. This is recorded. It is also monitored both locally and from our Railway Operations Centre.
Help Points	There are customer help points available at this station with separate buttons for information and emergencies. A call from one of these help points will connect a customer to someone at our Railway Operations Centre.

TPE's existing Penalty Fares Scheme already covers for situations where someone with accessibility requirements is not able to purchase a ticket for their intended journey prior to travel from the station by permitting them to travel without one and purchase it at the first available opportunity without any additional charges.

Demographics

Dewsbury is located in Kirklees. According to the 2011 census, the most recent data available at the time of this EqIA, there were 422,458 people living in Kirklees.

- 2,559 people lived in a care home (0.6%).
- 89,995 people were aged over 60 (21.3%).
- 45,375 households had at least one person with either a long-term health problem or a disability.

There are several points of interest in Dewsbury, including:

- Dewsbury & District Hospital.
- The Markazi Mosque.
- Heckmondwike Grammar School.
- Hanging Heaton Golf Club.

The nearest prisons are HMP New Hall (6.2 miles from Dewsbury station) and HMP Wakefield (6.1 miles from Dewsbury station).

In the financial year 2022-2023, there were 783 Passenger Assist bookings to or from this station, an average of around 15 per week. Of these, 481 were pre-booked and 302 were turn-up-and-go. Appendix 1 details how these bookings, totalled for the year, align with the proposed staffing hours for this station.

In the financial year 2022-2023, this station sold 2,803 tickets with a Disabled Persons Railcard discount applied. In the same period, this station also sold 12 tickets with a non-railcard holder disabled persons discount applied (for wheelchair users and people with visual impairments).

For our station workforce as a whole (across all TPE managed stations), 40% of staff are female (compared to 22% across all roles in the company). 2% of staff working in station roles have disclosed a disability.

Local Plans

Not applicable.

Planned / Aspirational Developments

The ticket office at this station is proposed to close permanently. This will result in station employees being moved in front of the ticket office window and closer to the customer. This will better enable station teams to assist customers in all parts of the station with Passenger Assists, purchase tickets from TVMs should they wish to do so, and other information, wayfinding and facility availability and condition monitoring. The staffing times for the station are set to be revised as follows:

	Monday - Friday	Saturday	Sunday
Current	06:00 – 20:00	06:00 – 20:00	07:15 – 19:45
Proposed	07:00 – 19:00	08:00 – 15:00	09:00 – 16:00

3. Assessment of Impact

We have considered the 9 protected characteristics identified within the 'Equality Act 2010'. We have identified whether the proposed change will have a positive or negative impact upon people with these characteristics, inclusive of employees too, and provided details. We will review this Assessment of Impact with customers and employees as part of the meaningful consultation process, in particular with organisations and representatives with specific those with knowledge and expertise in the identified characteristics.

3. Assessment of Impact

Characteristic	Y/N	Potential Negative Impact
1. Disability	Y	<ul style="list-style-type: none"> Customers currently use the Ticket Office as a point of contact from where they can receive support from station staff or as a meeting point for their passenger assistance. Not having this as a dedicated base may mean that customers are less confident about how and whether they can receive the support they require. According to the UK Consumer Digital Index from Lloyds Bank, people with a disability are 35% less likely to have essential digital skills for life. Therefore, they may struggle with purchasing tickets online or using a TVM. Vulnerable customers can use the Ticket Offices and waiting rooms as a point of safety and refuge. Not having this centralised location or having the opening times of waiting rooms altered may leave some customers feeling anxious about being at the station. Some colleagues may have disabilities or health conditions which preclude them from carrying out the proposed multiskilled role. This station will be staffed for fewer hours than current operating hours, which will mean a corresponding reduction in the hours that Passenger Assistance can be provided for customers who require help through the station. Disabled customers may potentially be victims of financial extortion if they need to give their bank card to others to assist them with purchasing tickets. Customers with hearing impairments may find it difficult to obtain information if staffing hours are reduced, particularly if they rely on lip reading. Some customers purchase specially discounted tickets for wheelchair users and their companions, and for registered blind people from ticket offices which would be closed as part of this programme. Members of staff with neurodiverse conditions or anxiety may find it difficult to adapt to new working arrangements. Members of staff with some disabilities may struggle with the increased amount of walking / standing, and the increase in more physically demanding tasks.
2. Age	Y	<ul style="list-style-type: none"> Older customers are less likely to be digitally connected and as a result they may struggle with the inability to purchase a ticket face to face. According to Age UK, one in five older people rely on cash for everyday spending. Under this proposal, in the long term, it will not be possible to pay for a ticket with cash at a station. Older people relying on customer support colleagues to use the TVM on their behalf could be opening themselves up to potential financial safeguarding concerns.

		<ul style="list-style-type: none"> Older people may be socially isolated, and the Ticket Office offers them the opportunity to have a conversation with other members of their community. Unaccompanied minors or potential victims of sex trafficking could potentially be missed. Moving staff to the other side of the ticket office window will increase touch points with them, however they may face challenges locating a member of staff due to them not being in a fixed position.
3. Pregnancy / Maternity	Y	<ul style="list-style-type: none"> A lack of Ticket Offices or waiting rooms may mean that pregnant customers, or those with young children, may feel vulnerable sitting directly on the platform in specific situations. The Ticket Office acts as a place of safety. Mothers who breastfeed may not be able to find a suitable location to do so if station facilities are changed. Members of staff who are conducting light duties due to pregnancy may struggle with the increased amount of walking / standing, and the increase in more physically demanding tasks.
4. Race	Y	<ul style="list-style-type: none"> Members of staff from ethnic minority backgrounds may be at a greater risk of abuse if they are working outside of the Booking Office.
5. Religion / Belief	Y	<ul style="list-style-type: none"> Members of staff who fast as part of their religious practises who previously worked within a ticket office may find they become more fatigued or dehydrated, potentially impacting their concentration during this period. Members of staff who practise some religions / beliefs may be at a greater risk of abuse if they are working outside of the Booking Office.
6. Sex	N	
7. Sexual Orientation	Y	<ul style="list-style-type: none"> Members of staff from the LGBTQIA+ community may be at a greater risk of abuse if they are working outside of the Booking Office.
8. Marriage / Civil Partnership	N	
9. Gender Reassignment	Y	<ul style="list-style-type: none"> Transgender employees (or those transitioning in the future) may be at a greater risk of abuse if they are working outside of the Booking Office.

Other	Y	<ul style="list-style-type: none">• People who have been released from prison are often provided with travel warrants to help them return home, which would normally be processed at a Ticket Office.
-------	---	---

Draft - Subject To Consultation

4. Consultation

This Equality Impact Assessment will be deemed a live document that may be adapted or revised at the appropriate time to reflect any changes or further considerations that may need to be considered following the conclusion of meaningful consultation with our customers, employees, and stakeholders.

Customers and representatives of those with protected characteristics will have the opportunity to review and respond to our proposals through the TSA Major Change process. We will meet our Accessibility Panel on the day of the launch of this consultation to engage them with this process.

Likewise, employees with protected characteristics will have the opportunity to review and respond to our proposals through the employee consultation process, which will be delivered in line with our collective bargaining agreements and other relevant policies, processes, and procedures. For the avoidance of doubt, our employee consultation is set to launch at the same time as the TSA Major Change consultation.

Consultee	Characteristic	Record of Engagement	Potential issues raised
Transport Focus.	<ul style="list-style-type: none"> Disability Age 	Two meetings were held with Transport Focus on 18/10/2022 and 05/06/2023 to engage them in a summary of our proposals and understand the key areas of consideration.	There were specific concerns raised around ability to purchase full range of tickets for customer who are not digitally enabled, ability to pay by cash, assistance for customers with disabilities and availability of toilets and waiting rooms. TPE has considered this feedback in the development of its proposals and will continue to welcome and encourage further feedback on our proposals and mitigations.
Various (via the Rail Delivery Group).	<ul style="list-style-type: none"> Disability Age 	On behalf of the industry, Rail Delivery Group has held meetings with several passenger representative and accessibility organisations which have discussed the proposed changes to stations pre-consultation launch and will continue to engage with these groups. These meetings have included individual sessions, a ministerial roundtable meeting on 06/06/2023 and RDG's Accessibility & Inclusion meetings.	<p>Key themes raised through these meetings and shared with train operators were:</p> <ul style="list-style-type: none"> Concerns regards Ticket Office closures leading to less staff, which would potentially deter people with disabilities from using the railway due to concerns regards assistance and safety. Concerns regarding ability to turn-up-and-go. Concerns regarding the accessibility / limitations of Ticket Vending Machines. Concerns about lack of alternative formats for the consultation. Concerns about how to locate staff on stations.

			<ul style="list-style-type: none"> There were also concerns around maintaining the current availability of facilities, such as toilets and waiting rooms, for customers. <p>TPE has considered this feedback in the development of its proposals and will continue to welcome and encourage further feedback on our proposals and mitigations.</p>
<p>TransPennine Express Customers & Professionals Accessibility Panel (which includes several customers as well as representation from RNIB, My Sight York, Innovation in Society, and Disability Rights UK).</p>	<ul style="list-style-type: none"> Disability Age 	<p>A meeting was held with our panel on 05/07/2023 in order to consult them regarding our proposals at the earliest possible opportunity. To facilitate the attendance of as many members as possible, an additional evening session was held on 11/07/2023. The panel was given the opportunity to hear about our proposals, and the mitigations from this Equality Impact Assessment. We then asked for their concerns and feedback.</p>	<p>Key themes raised through these meetings were:</p> <ul style="list-style-type: none"> Concerns that if members of staff are moved outside of the Ticket Office, it might be difficult to locate them if assistance is required. Many people still use cash as their preferred method of payment. Concerns were raised regarding the accessibility of Ticket Vending Machines. A request that when new staffing hours are implemented, these are available in alternative accessible formats in addition to being advertised online and on station welcome posters. <p>TPE has considered this feedback in the development of its proposals and will continue to welcome and encourage further feedback on our proposals and mitigations.</p> <p>In addition, we discussed with the panel the alternative formats which the consultation is available in (braille, large print, and audio) and how to request them (via our Contact Centre using phone, textphone, or email).</p>

TSSA Full Time Officer	<ul style="list-style-type: none"> All 	This Equality Impact Assessment was discussed with the TSSA Full Time Officer during a meeting held on 07/08/2023.	The Full Time Officer raised a point about transgender employees (or those transitioning in the future) and the fact they may be at a greater risk of abuse if they are working outside of the booking office.
Stations Grade Company Council	<ul style="list-style-type: none"> All 	This Equality Impact Assessment was discussed with the Station Grade Company Council (SGCC) during a meeting held on 30/08/2023.	Concerns were raised about the increased risk of abuse for staff from ethnic minority backgrounds, staff practising different religions and beliefs, staff from the LGBTQIA+ community, and transgender employees (or those transitioning in the future) if they are moved to work outside of the booking office.

Draft - Subject To Consultation

5. Review

Acting as a gateway, based on the evidence, identified potential risks and consultation responses, next steps must be determined:

Action	Tick
<p>Proceed No potential risks have been identified and consultee feedback has raised no concerns which need to be addressed. <i>(Skip section 6)</i></p>	
<p>Proceed (with Mitigations) Produce an action plan which mitigates all identified potential risks and concerns raised by consultees without affecting the scope of the project/change.</p>	✓
<p>Change Risks have been identified which cannot be mitigated without changing the scope of the project/change.</p>	
<p>Stop Risks have been identified which cannot be mitigated or addressed through a change of scope.</p>	

6. Action Plan

Action	Owner	Due Date
<p>We have reviewed and developed our proposed station staffing times to align with the busiest 7-hour period (i.e., one shift) in a day per station – we have used ticket office transaction data for 2022/23 as the basis for this. We have also taken into consideration the times of day when booked and un-booked Passenger Assistance is highest, as well as feedback from station management. Staff will be more readily available to provide Passenger Assists and assist people when purchasing a ticket at the station at busier times by being outside the ticket office and closer to the customer.</p>	<p>Head of Customer Experience</p>	<p>Completed</p>

As part of this proposal, station staff will be more readily available around the station to provide support to customers. Customers will still be able to contact a TPE member of staff 24/7 (except Christmas Day and Boxing Day), via the Help Point at any station or via our Twitter / WhatsApp channels, or between 06:00 and 23:00 7 days a week by phoning our contact centre, or 24/7 for Passenger Assists (except Christmas Day and Boxing Day). We will also ensure there is a means by which a customer can contact a member of staff at the station.	Head of Stations and Safeguarding	Prior to implementation
Customers will be able to purchase tickets over the telephone via Northern's telesales service if they have assisted travel requirements (even if they do not require Passenger Assist), and this will be publicised in customer communications.	Head of Customer Experience	Prior to implementation
A TOM will be retained at each location in order that customers who wish to purchase an Unusual Product can continue to do so. Unusual Products comprise less than 0.5% of our ticket office transactions and mainly include warrants and cheque and cash refunds. Further, we are also working with industry partners, including other train operating companies, to ensure customers can continue to enjoy widespread and easy access to the same number of tickets and products as they can today. The TOM can also be used to retail National Railcards to customers unable to apply online or using a smartphone.	Head of Retailing Strategy	Completed
The former ticket office areas can still be utilised as a refuge area for a customer when accompanied by a member of staff. Shutters, blinds or branded boarding may be installed at former ticket office windows where it is felt relevant and appropriate to do so, and cleaning staff are to be provided with the means to open / close waiting rooms and station concourses outside times of station staffing. We will continue to open and close customer facilities at the stations on a like-for-like basis as today using our cleaning contractor where required and this may be subject to consultation.	Head of Customer Experience	Prior to Implementation
Where a colleague has a disability or health condition that may preclude them from carrying out the proposed multiskilled role, alternative options will be explored with the individual in congruence with the industry reform programme and company policies, procedures and existing support schemes.	Human Resources Director	Prior to implementation
Where a station becomes staffed for fewer hours than it currently is, this will mean some customers with accessibility requirements would have to be provided with accessible taxis as train crew will not be able to support customers through the station after getting off the train. This is a process that is currently in place today, but with staffing times reduced, there may be an increase in the number of taxis booked. Control staff will be briefed on the new station hours and proactively monitor CCTV to remain attentive to any 'turn up and go' journeys	Head of Customer Experience	Prior to implementation

requiring assistance (where the Control staff are then able to communicate with that customer via a station announcement or via the Help Point).		
Customers who need to pay with cash, and customers with accessibility requirements who have been unable to purchase their ticket before boarding as a result of the facilities available, will be able to purchase their ticket on-board the train from the Conductor with no fine or additional charges applied. Our Penalty Fares Scheme already provides for these scenarios and does not need to be updated. Also, a TOM will be retained as an interim measure at all locations until permanent solutions are in place for all the Unusual Products.	Head of Retailing Strategy	Completed
Continued promotion of our Chatty Benches to support people feeling socially isolated.	Accessibility & Transport Integration Manager	Prior to implementation
Continued provision of safeguarding training to all station staff and train crew in partnership with Railway Children and in line with the prevailing Safeguarding Strategy.	Head of Stations and Safeguarding	Ongoing Programme
To assist customers travelling independently through the station, we have launched My Station View and GoodMaps at all TransPennine Express stations. My Station View provides immersive online 3D tours of our stations which can be taken prior to travelling to view facilities and routes. GoodMaps functions as an indoor Sat-Nav and provides turn-by-turn directions through the station accurate to just a few meters.	Accessibility & Transport Integration Manager	Completed
To support customers with hearing impairments, as part of our rolling accessibility improvement programme we thoroughly tested all our station induction loops in early 2023 to ensure they are working and of a good quality. A maintenance contract is in place to ensure their upkeep, and we are progressing a programme of improvements to make the induction loops on our platforms more user friendly.	Accessibility & Transport Integration Manager	Completed
Live British Sign Language interpretation is currently available at the Ticket Office using a tablet. This tablet will continue to be available even when the Ticket Office has closed and can be collected by a member of staff when it is requested by a customer.	Accessibility & Transport Integration Manager	Completed
The retailing of specially discounted tickets for wheelchair users and their companions, and for registered blind people, can still be completed using the TOM or on board by Conductors.	Head of Retailing Strategy	Completed
To assist blind and partially sighted customers who wish to navigate through the station independently, we have installed braille tactile wayfinding signage on handrails for all stairs and ramps. These signs indicate the directions to all platforms and the exit.	Accessibility & Transport Integration Manager	Completed
To ensure that customers know when staff will be available at the station to provide assistance, we will ensure that the staffing hours are published online via our website and National Rail Enquiries, as well as on the station's welcome poster. The staffing hours will also be available in alternative accessible formats.	Head of Communications	Completed

To support customers with hearing impairments, we have launched sign language departure boards at this, and several other stations managed by TransPennine Express. When changes are made to stations as part of this programme, the screens will remain available in locations where customers can easily locate them.	Accessibility & Transport Integration Manager	Completed
In the event that a customer cannot pay by card and is only able to pay with cash and is unable to do so at a ticket vending machine, they will be permitted to pass through the ticket gates without a ticket by station staff so that they can pay with cash on the train.	Head of Retailing Strategy	Completed
To assist customers who wish to navigate through the station independently, but for who our digital options may be unsuitable, we have installed a RNIB Map for All outside the main entrance. This map includes good colour contrast, tactile elements and braille making it suitable for people with a variety of accessibility requirements.	Accessibility & Transport Integration Manager	Completed
A review is being undertaken of all lifts at TransPennine Express managed stations to ensure that they can be switched on and off remotely by staff in our Railway Operations Centre. This will ensure that lifts are available even outside of station staffing hours.	Head of Customer Experience	Prior to implementation
Staff will be able to use our free Health Assured service if they are experiencing physical or mental health challenges as a result of changes to their role or redeployment and will be individually assessed by our Occupational Health Provider and have access to an inhouse Occupational Health and Wellbeing Manager.	Human Resources Director	Completed
We have an in-house Learning & Development team who will support staff with gaining any new skills required for their changed role or redeployment.	Human Resources Director	Prior to implementation
We will continue to provide our Try The Train Days programme which supports people with increasing their confidence travelling by rail.	Accessibility & Transport Integration Manager	Ongoing Programme
Local management teams will work closely with colleagues during periods of fasting to ensure their welfare is maintained, they have access to the facilities they need, and consideration is given to shift patterns.	Human Resources Director	Prior to implementation
Local management teams will work closely with colleagues with protected characteristics on a risk assessment regarding their work outside of the Booking Office.	Human Resources Director	Prior to implementation for existing employees, then ongoing.

7. Approval

STATEMENT:

To the best of my knowledge, I am content that all potential risks brought about by the delivery/implementation of this project/change affecting those with protected characteristics have been identified and that suitable steps have been taken to mitigate against these or amend the scope to ensure no resulting detriment to their experience or the service offered.

Senior Manager

Name: TBA
Role: Head of Customer Experience Delivery
Date: [Date]
Signature: TBA

Exec Sponsor

Name: TBA
Role: Strategy Director
Date: [Date]
Signature: TBA

Accessibility & Transport Integration Manager

STATEMENT:

I have reviewed the content of this Equality Impact Assessment and agree with its content and the actions put forward to ensure that the service offered to customers with protected characteristics are appropriate.

Name: TBA
Date: [DATE]
Signature: TBA
