

# The Highland Council

Agenda Item	<b>10b</b>
Report No	<b>HP/08/25</b>

**Committee:** Housing and Property

**Date:** 29 January 2025

**Report Title:** Community Asset Transfer – Elphin Community Hall

**Report By:** Assistant Chief Executive - Place

## 1. Purpose/Executive Summary

- 1.1 The Community Empowerment (Scotland) Act introduces a right for community bodies to request to own, lease or use public sector assets through a process known as Community Asset Transfer. As part of this request a discount on market value can be requested. Once a formal request is submitted, Local Authorities have 6 months to assess the application against a range of potential community benefits and determine whether to grant the request.
- 1.2 Where Council assets are over the value of £100,000, decision on the transfer of any asset rests with the Housing and Property Committee. This report asks Members to consider and agree the Community Asset Transfer (CAT) request received from Elphin, Ledmore, and Knockan Community Association Ltd to purchase Elphin Community Hall (former Assynt Primary School) and surrounding land (0.4ha) at Elphin IV27 4HH.

## 2. Recommendations

Members are asked to:

- **AGREE** the sale of Elphin Community Hall (former Assynt Primary School) and surrounding land (0.4ha) to Elphin, Ledmore, and Knockan Community Association Ltd (ELKCAL) for £1 based upon the terms of transfer as set out in the report at 7.1.

## 3. Implications

- 3.1 **Resource** -Title of the property subject to this CAT has been checked and confirmed to be in Highland Council ownership. There is no plan attached to the title (dated 1879) although a plan has been found in the Inland Revenue Field Book. The exact boundary on the ground will need to be determined by the buyer. ELKCAL currently leases part of the site and all the buildings. The lease expires in 2035.

ELKCAL is requesting full discount on the market value of £115,000 for the land and building. The value reflects the fact that it is leased until 2035, although the lease will fall on transfer as the tenant is also the CAT applicant. The discount is justified by the significant community benefit to this remote rural community. A proposed right of pre-emption for £1 in favour of Highland Council ensures the Council is able to protect its interest in the development value of the property should it be subsequently sold for development or other purpose contrary to the CAT request.

A Community Asset Transfer officer group including representatives from Legal, Finance, Property and Communities and Place has considered and scrutinised the CAT request and supporting evidence. The request is recommended to proceed.

- 3.2 **Legal** - Community Asset Transfer (CAT) is a legislative process set out in the Community Empowerment Act. Public bodies have the right to refuse a CAT application on the grounds that greater community benefit will arise from current or alternative use. However, community bodies have the right of review, first to the public body and then by appeal to Scottish Ministers.
- 3.3 **Risk** - Although any CAT assessment considers sustainability, there are risks that any group could fail in the future or choose to dispose of the transferred asset. The right of pre-emption proposed for this transfer mitigates these risks. In addition, the Community Empowerment Act provides a clause which stipulates how dissolution must be dealt with to ensure any transferred asset remains in community hands, for the benefit of the community, in the event of an organisation ceasing to exist.
- 3.4 **Health and Safety (risks arising from changes to plant, equipment, process, or people)** - No implications.
- 3.5 **Gaelic** - No implications.
- 4. Impacts**
- 4.1 In Highland, all policies, strategies or service changes are subject to an integrated screening for impact for Equalities, Poverty and Human Rights, Children's Rights and Wellbeing, Climate Change, Islands and Mainland Rural Communities, and Data Protection. Where identified as required, a full impact assessment will be undertaken.
- 4.2 Considering impacts is a core part of the decision-making process and needs to inform the decision-making process. When taking any decision, Members must give due regard to the findings of any assessment.
- 4.3 **Integrated Impact Assessment - Summary**
- 4.3.1 An Integrated Impact Assessment screening has been undertaken on the proposed transfer and the conclusions have been subject to the relevant Manager Review and Approval.
- 4.3.2 The Screening process has concluded that there are positive impacts identified in relation to socio economic, children's rights, island and mainland rural and climate change as a result of the proposed transfer. Members are asked to consider the summary in **Appendix 1** to support the decision-making process.
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4.3.3	Impact Assessment Area	Conclusion of Screening/Full Assessment
	Equality	No impact
	Poverty and socio-economic	Positive
	Human rights	No impact
	Children's rights & well-being	Positive
	Island and mainland rural	Positive
	Climate change	Positive
	Data rights	No impact

## 5. Background

- 5.1 Highland Council mothballed Assynt Primary School in Elphin in 2001 and formally closed it in 2006. During the statutory school closure consultation process it was evident that the community had aspirations to put the former school to community use. Subsequently, in 2010 ELKCAL was constituted and leased the former school which has since been used as a Community Hall. The lease expires in 2035. Since 2010 ELKCAL has made significant incremental improvements to the dilapidated former school building and grounds including: roof repairs, repointing, flooring, new kitchen, toilets, disabled access, lighting, redecoration, storage, car parking. ELKCAL tenure of the building has effectively relieved the Council of a maintenance liability.
- 5.2 ELKCAL was constituted as a Company Limited by Guarantee in 2010 and as a charity in 2011. The constitution was most recently amended on 3 August 2024 to fully comply with Community Asset Transfer eligibility criteria. The Charitable Company comprises 9 Directors and has approx.100 members. The objective are as follows:

*To acquire the old Assynt Primary School building and its associated land in Elphin and to convert and operate it as a community centre for the use of the full and part-time residents of the townships of Elphin, Knockan, Ledmore, Lyne and Benmore and their neighbourhood in the Highland Council area of Scotland without distinction of age, race, or sex, or political, religious or other opinions, including: i) use for the social welfare of the local community and meetings, lectures, exhibitions, classes and other forms of recreation and leisure time occupation and arts and literature; ii) encourage training and the advancement of education; iii) encourage the study, understanding and exposition of the Assynt region's history, culture, natural history, geology and geography; iv) any other purposes that may reasonably be regarded as analogous to any of the preceding purposes.*

- 5.3 ELKCAL has leased the former Assynt Primary School from Highland Council for £1pa since 2010, and the property has been used successfully as a community hall for the surrounding communities of Elphin, Ledmore, Knockan, Ben Moore, Aultnacealgach, Lyne, Stronchrubie, and Inchnadamph. There is no other such facility in the area.

ELKCAL wants to develop the facilities at the community hall to make it more suitable for a wider variety of community groups to use including improving the heating in the building so that it can be used in winter, upgrading the toilets to cater better for mothers with children, increasing the energy efficiency of the building.

Priority projects (to be completed within one year of transfer) are:

- Heating upgrade (est £3,000).

- Installation 12 panel ground array of 365Wp panel totalling generation of 4.4kWp, a battery storage system and control system (est £20,000).

Further projects include:

- Improve hall insulation
- Toilet upgrade to include baby changing
- Extended parking
- Development of campervan stopover, waste disposal, electric hook ups
- EV charging.

Having ownership of the building and land will allow:

- ELKCAL to secure funding and deliver larger projects rather than being limited by the conditions of the lease
- Delivery of projects on the area outwith the current lease (e.g. PV cells)
- Clear ownership and responsibility for the septic tank which is within the area owned by HC but outwith the area currently leased to ELKCAL.

## 6. CAT Assessment

6.1 The full assessment is presented in **Appendix 2** of this report. The proposal has been evaluated as follows:

Criteria	Assessed as:
Benefit to the community	Very strong
Capacity to deliver	Strong
Level of community support	Strong
Sustainability	Strong
Resourcing	Strong/ Moderate

6.2 In summary, this is a strong application from a well-established local community group which has the funding and skills to deliver on the commitments outlined. This project aims to benefit the local and wider community in this remote rural area by further enhancing the services and facilities available at Elphin Community Hall.

6.3 The CAT request is for £1 equating to a £114,999 discount. This can be justified as the project delivers significant community benefit to this remote rural community.

6.4 In recognition of the potential development value of the building and site, a right of pre-emption in favour of Highland Council is proposed on the property to ensure that in the event the property is sold or otherwise disposed of, the Council will seek the option of repurchasing the asset for the original sale value of £1.

## 7. Recommendation

7.1 Sale of Elphin Community Hall (former Assynt Primary School) and surrounding land (0.4ha) to Elphin, Ledmore, and Knockan Community Association Ltd for £1. Terms of the transfer would include:

- ELKCAL will cover all reasonably incurred property and legal costs associated with the asset transfer process – both the Council's and its own.
- Any transfer will be subject to existing burdens/conditions in the Council's title to the property (e.g., third party access rights, etc.). The Council may also impose further burdens/conditions if they consider this expedient (e.g., economic development burdens, etc).

- The Council will only transfer/lease property for which it has title to do so.
- A right of pre-emption is proposed on the property to ensure that, in the event the property is sold or otherwise disposed of, the Council will seek the option of re-purchasing the asset for the original value of £1.
- Any other terms to be agreed by the Assistant Chief Executive – Place in consultation with the Chair of Housing and Property Committee.

Designation: Assistant Chief Executive - Place

Date: 16 December 2024

Author: Phil Tomalin, Community Development Manager

Appendices: Appendix 1 – Integrated Impact Assessment Screening Summary  
Appendix 2 – CAT Assessment – Elphin Community Hall

## **Appendix 1**

### **Integrated Impact Assessment Summary**

The screening highlighted positive impacts in a number of areas:

#### **Poverty and socio-economic impact**

The Hall provides a venue and events for this remote rural community to meet and socially interact. In particular the proposal ensures people without access to transport or services, including the young, elderly and one car families (where the car is used for getting to work leaving the family without transport) are not marginalised as they can access and benefit from activities in their community at the hall, including social activities and events and activities that support economic activity (toddlers groups, craft markets). The hall is used for Assynt CC meetings (the CC rotates between locations) giving Elphin access to their CC.

#### **Impact on children and young people**

Improving opportunities for social interaction in this remote rural community. Children and young people in rural areas are often excluded from after-school, sporting and other social activities because they do not have access to transport. This proposal ensures there is a space for young people and the community to provide activities for children and young people within the community.

#### **Impact on island and mainland rural communities**

The hall is the only facility in this remote rural community. The nearest alternative community facilities are in Ullapool (15 miles) and Lochinver (21 miles). Without the facility, opportunities for community events in the community will be denied leading to reduced social interaction and higher travel costs to alternative venues for those people that are able to travel.

#### **Climate change**

The transfer will enable the community to meet locally preventing increased travel to alternative locations.

The first phase of improvements after transfer includes installing more efficient heating and PV cells to power the building, thus reducing carbon emissions.

## Appendix 2

### THE HIGHLAND COUNCIL

#### Community Asset Transfer Approach

#### Assessment Framework

<b>Asset:</b>	<b>Elphin Community Hall (Former Assynt Primary School)</b>
<b>Applicant:</b>	<b>Elphin, Ledmore &amp; Knockan Community Association Ltd (ELKCAL)</b>
<b>Date assessed:</b>	<b>15 November 2024</b>
<b>Assessed by</b>	<b>Phil Tomalin, CDM</b>

#### Purpose

The purpose of the assessment is to ensure that the decision making process will produce the best decision for the community, not necessarily Highland Council nor the requesting Community Asset Transfer Body.

#### Evidence

Primarily the assessment will be based on the information received within the application form and any business plan however additional representations from external parties will also be included along with internal service knowledge.

Cognisance will be taken regarding the nature of the request e.g. whether it is for lease, use or ownership. The level of assurance required will differ depending upon the nature of the request with higher level of compliance/support required for organisations wishing transfer of an asset as opposed to a leasing arrangement.

#### Structure of Assessment

The assessment will be structured under 5 key headings.

- Benefit to the community (outcomes)
- Capacity to deliver
- Level of community support
- Sustainability
- Resourcing

Consideration will also be given to the terms and conditions requested by the Community Asset Transfer Body and what equivalent terms may be appropriate.

Each of the 5 assessment areas will be assessed separately, considering evidence of best value and be given an overall rating from very strong to poor. A summary of the evidence required to achieve each rating is outlined below:

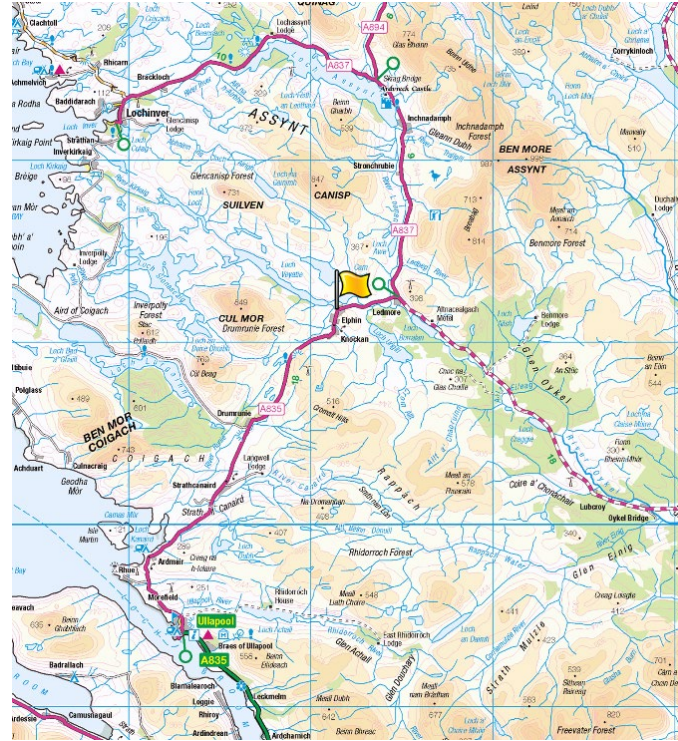
<b>Evidence</b>	<b>Overview</b>
Very strong	Governance and financial arrangements are strong and sustainable. Best value characteristics are evidenced and contained throughout the approach. Related projected benefits are very robust and demonstrate value for money.
Strong	Governance and financial arrangements are sound and sustainable. Best value characteristics are in evidence in the proposal. Related projected benefits are demonstrated well and represent value for money.
Moderate	Governance and financial arrangements are in place and acceptable. Best value characteristics have been considered as part of the proposal. Related projected benefits are acceptable and could lead to value for money.
Weak	Governance and financial arrangements are weak. Best value characteristics are not well demonstrated in the proposal. Related projected benefits are not based on robust information and demonstrates questionable value for money.
Poor	Governance and financial arrangements are poor. There is little evidence of Best Value characteristics in the proposal. Related projected benefits are ill defined and/or unrealistic and do not demonstrate value for money.



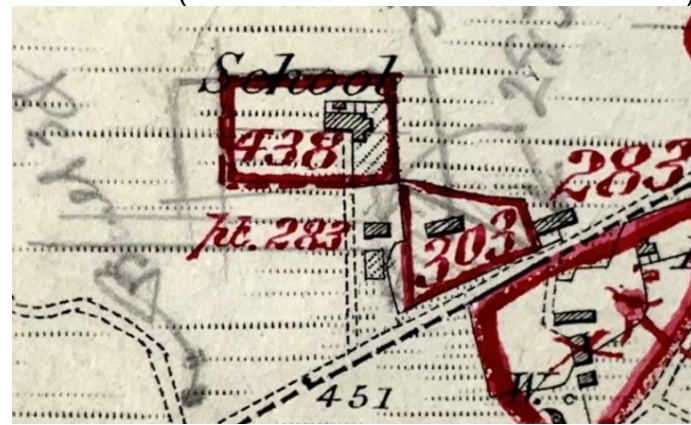
Elphin Community Hall



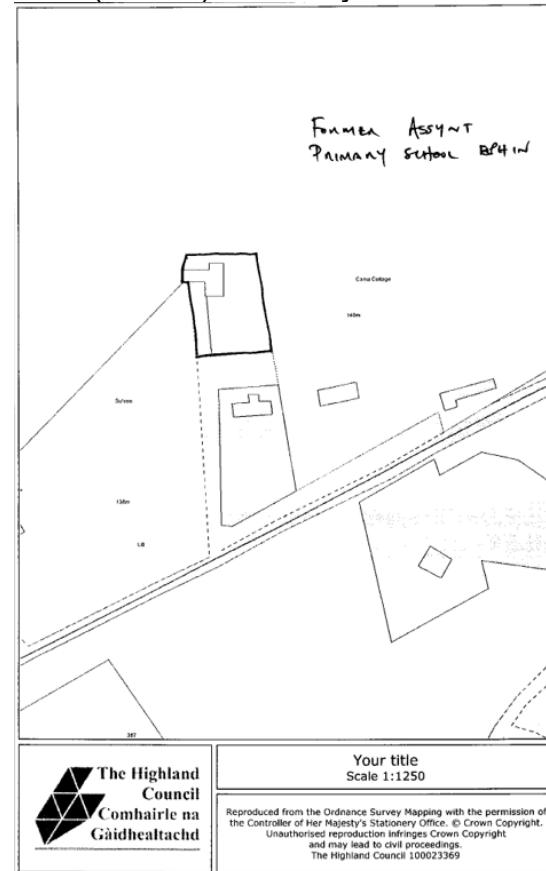
### Location



Area (0.4ha) currently owned by HC to be transferred (source: Inland Revenue Field Book)



### Area (0.13ha) leased by ELKCAL



<b>ASSESSMENT AREA:</b>	<b>BENEFIT TO THE COMMUNITY</b>		
<b>Criteria</b>	<b><i>Evidence from Community Asset Transfer Body</i></b>	<b><i>Additional Evidence/Information</i></b>	<b><i>Assessment of Compliance</i></b>
Economic benefits	<p>The hall is currently used for a weekly summer market including local produce and locally produced crafts, which support local businesses/livelihoods.</p> <p>If the CAT is successful there are plans to create a camper van stop over to generate additional income for the hall and footfall in the village.</p>	Application Business plan	Strong
Regeneration benefits	<p>When the community, through ELKCAL, took over the management of the hall it was in a very poor condition. Over 14 years ELKCAL has made incremental improvements to the building to bring it up to a modern, acceptable standard, including:</p> <ul style="list-style-type: none"> <li>• Roof repairs</li> <li>• Repointing</li> <li>• Flooring</li> <li>• New kitchen</li> <li>• Toilets</li> <li>• Disabled access</li> <li>• Lighting</li> <li>• Redecoration</li> <li>• Storage</li> <li>• Car parking</li> </ul>	Application Business plan	Very Strong

	<p>The plans for the building include:</p> <ul style="list-style-type: none"> <li>• New efficient infrared heating system – spec and estimate (£3K) provided to support application</li> <li>• Installation of PV cells – spec and estimate (£20K) provided to support application</li> <li>• Improved hall insulation</li> <li>• EV charging</li> <li>• Campervan parking and waste</li> </ul> <p>From the application:  <i>“This region has one of the most rapidly growing populations in Assynt, with more and more families moving into the area, increasing the number of children and young families. Many of these new people are bringing new crafts and skills to the area and leading to an enthusiastic, innovative outlook for the future. A community owned hall will be the perfect place for these ideas to flourish and develop. Hopefully, with the support of the Highland Council, the Community Asset Transfer will go ahead and this will enable Elphin and the surrounding area continue to grow and develop.”</i></p>		
Health benefits	The hall is the only community facility in the area. Nearest alternatives are Ullapool, Achiltibuie and Lochinver.	Application Business plan	Very strong

	<p>The hall reduces social isolation providing activities for children and families, older adults.</p> <p>The demographic of the local population is changing with more families with young children moving into the area, so the community hall is an important resource for the community to find support and a place to gather.</p>		
<p>Social wellbeing benefits</p>	<p>Users include Toddler group, Craft Circle, a meeting space for various groups including the 2 crofting associations in the township, the Assynt Community Council, for council meetings and the Highland Council as a polling station. It is also used for birthday parties, wakes and wedding receptions. During its use as a Community Hall, it has been used for Friday Night Games nights which served the children and teenagers in the township, First Aid courses and Yoga classes. It is regularly used for information dissemination and display space for local and outside groups and activities such as the Northwest Highland Geopark, Coigach Arts Group and the Grampian Speleological Group. It has also been used for numerous workshops involving everything from dry stone walling to fabric dying with natural dyes.</p>	<p>Application Business plan</p>	<p>Very Strong</p>

	<p>Gathering for music has always been a strong attraction in the community and the hall has been used for musicians to get together regularly to practise and to perform for ceilidhs held at the hall. The hall has hosted several music festivals, bringing in people and bands from further afield. At present, one of the residents of the township is giving music tuition to both the children and adults of the community, using a room at the hall as his teaching studio and a group of local musicians perform at ceilidh events held at the hall.</p> <p>The hall is also used for a weekly Craft and Food Market during the summer season which draws both local people and tourists travelling along the A835. This is an ideal venue for many local artisans to sell their creations and enables them to continue their crafts and so continue to live in the area. Besides these numerous activities held at the hall ELKCAL regularly organises community events and dinners to bring the people who live here together for much needed social interaction. These events such as Chicken Day, the Midsummer Fete and Christmas dinner strengthen the bonds of the community.</p>		
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Environmental Benefits	<p>Without the hall residents would have to travel to Ullapool (15 miles) or Lochinver, the largest settlement in Assynt CC (21 miles).</p> <p>If the CAT is agreed the first projects are planned for completion within a year of the transfer. These include upgrading to an efficient infrared heating system and installing photo-voltaic panels.</p>	Application Business plan	Very Strong
Tackling inequality	<p>ELKCAL has made improvements so that the building is disabled accessible (toilet, ramps)</p> <p>ELKCAL has Child Protection and Equal Opportunities policies in force</p>	<p>Application Business plan</p> <p>ELKCAL website  <a href="https://www.elkcal.org/elkcal/policies/">https://www.elkcal.org/elkcal/policies/</a></p>	Strong
Promotion of equality	Remote rural: The hall is used to provide services and community activities for all age groups / interests in a remote rural area where there are no alternative community facilities.	Application Business plan	Very Strong
Any other benefits detailed	The hall is used for Assynt CC meetings and as a Polling Station	Application Business plan	Strong
<b>Benefit to the Community Assessment Summary:</b>			<i>Rating – Very Strong</i>

<b>ASSESSMENT AREA:</b>	<b>CAPACITY TO DELIVER</b>		
<b>Criteria</b>	<b>Evidence from Community Asset Transfer Body</b>	<b>Additional Evidence/Information</b>	<b>Assessment of Compliance</b>
Experience of organisation	ELKCAL was formed in 2010 and has leased the hall from Highland Council since then. It has improved and maintained the building since 2010	Application Business plan	Strong
Access to appropriate advice and support	ELKCAL has its own legal adviser and accountant	Application 2023 Accounts	Strong
Have sought advice and support during application phase	ELKCAL has been in regular contact with HC Community Development team, Legal and Property services	CDM	Strong
Appropriate skills within the organisation	<p>ELKCAL has successfully managed the property as a community hall for the last 14 years and has demonstrated that the ELKCAL Board has the skills to provide activities and services that are well supported by the community.</p> <p>ELKCAL has also demonstrated the financial skills to make sound decisions to be able to continue running the community hall successfully.</p> <p>ELKCAL is properly constituted and up to date with Companies House and OSCR</p>	Application Companies Ho/ OSCR ELKCAL website	Strong



	ELKCAL has appropriate policies and safeguards in place for financial management		
Access and level of volunteer support	<p>Association has over 100 members and represents a major proportion of the people who live in the area and who benefit from the facilities at Elphin Hall.</p> <p>Incremental improvements to the hall have been supported with voluntary effort including in kind support from local businesses (e.g. installation plumbing etc.)</p>	Application	Strong
<b>Capacity to Deliver Assessment Summary:</b>		<i>Rating – Strong</i>	

<b>ASSESSMENT AREA:</b>	<b>LEVEL OF COMMUNITY SUPPORT</b>		
<i>Criteria</i>	<i>Evidence from Community Asset Transfer Body</i>	<i>Additional Evidence/Information</i>	<i>Assessment of Compliance</i>
Community involvement in developing the request	The proposal was developed by the ELKCAL Board, comprising members of the community, following discussion at community meetings.	Application	Strong
Community support for the request	<p>ELKCAL has over 100 members and represents a major proportion of the people who live in the area and who benefit from the facilities at the Community Hall.</p> <p>The proposed purchase of Elphin Hall has been discussed widely within the community for several years and when it was raised at the</p>	<p>Application</p> <p>15 letters of support from community and partners inc. Assynt CC and local HC Member</p>	Very Strong

	<p>recent ELKCAL AGM all the community members present agreed that this would greatly benefit the community.</p> <p>The hall has been well used and supported by the community since 2010 when the community took over the hall. The property has been used successfully as a community hall for the surrounding communities of Elphin, Ledmore, Knockan, Ben Moore, Aulnacealgach, Lyne, Stronchrubie, and Inchnadamph.</p>		
<b>Level of Community Support Assessment Summary:</b>		<i>Rating – Strong</i>	

<b>ASSESSMENT AREA:</b>	<b>SUSTAINABILITY</b>		
<b>Criteria</b>	<b>Evidence from Community Asset Transfer Body</b>	<b>Additional Evidence/Information</b>	<b>Assessment of Compliance</b>
Financial – ability to support/fund the asset in the future	<p>ELKCAL has sufficient funds (£17K) for the purchase of the property at the above proposed price including legal fees; to cover ongoing running costs and contribute to upgrade project costs.</p> <p>ELKCAL will actively fundraise for the proposed improvements to the building. ELKCAL has a strong track record of fund raising and improving the facility.</p> <p>The initial focus will be on the PV and heating upgrade projects. With a combined estimated</p>	Application 2023 Accounts Spec/ Quotations	Strong

	<p>cost of £23K, these are affordable without the requirement for significant fundraising so expected to be completed within one year of the building being transferred.</p> <p>ELKCAL states that ownership of the building will open up opportunities for funding. No funding has yet been secured, although ELKCAL has identified the following potential funding sources.</p> <ul style="list-style-type: none"> <li>• Energy Trust Scotland via Business Energy Scotland have indicated that the installation of PV cells and heating upgrade projects are eligible for 75% funding.</li> <li>• Highland Council Community Regeneration Fund – approx. £700K pa available for projects in Sutherland.</li> <li>• ELKCAL own funds</li> </ul>		
<p>Governance – sustainability of the organisation</p>	<p>ELKCAL has successfully managed the hall for the last 14 years and during this time demonstrated that the Board has skills to provide activities and services that are well supported by the community; and the financial skills to run the community hall successfully.</p> <p>ELKCAL has a membership of 100</p>		<p>Strong</p>
<p><b>Sustainability Assessment Summary:</b></p>			<p><i>Rating – Strong</i></p>

<b>ASSESSMENT AREA:</b>	<b>RESOURCING</b>		
<b>Criteria</b>	<b><i>Evidence from Community Asset Transfer Body</i></b>	<b><i>Additional Evidence/Information</i></b>	<b><i>Assessment of Compliance</i></b>
Value of asset	£115,000	HC Estates valuation	
Legal title and relevant information	<p>ELKCAL currently leases the hall and part of the HC owned site. Lease expires 2035.</p> <p>Title has been checked and confirmed to be in HC ownership. There is no plan attached to the title, although a plan has been found in the Inland Revenue Field Book (see above)</p> <p>The exact boundary on the ground will need to be determined by the buyer.</p> <p>ELKCAL currently lease part of the site and all the buildings. Lease expires 2035.</p>	HC Legal	Moderate/Strong
Current use of the asset and potential impact	<p>Education Estates has indicated there is no service potential use for the building and supports disposal</p> <p>Housing Development has been consulted and is not aware of any current demand in Elphin. Furthermore, the fact that the site has not been available for 11 years and is currently a well-used community asset means there is no Housing Development interest in the site.</p> <p>Housing Development noted that the playground area may be developable in the future, but</p>	Education Estates Housing Development	Strong

	<p>ELKCAL has confirmed that this area is used for outdoor community events and has no plans to develop the site. Most of the additional land is wet / boggy rough ground and not developable. ELKCAL plans to put PV cells on that area.</p>		
<p>Requested purchase/discount value</p>	<p>£1 (£114,999 discount); delivers significant community benefit to this the remote rural community.</p> <p>The discount can be justified as follows:</p> <ul style="list-style-type: none"> <li>• Highland Council has no use for the building and site, but recognised part of site has possible development value.</li> <li>• Transfer would reduce maintenance liability to HC, which would otherwise fall to HC if not leased.</li> <li>• Not vacant for 11 years (already factored into price) limits ability of HC to develop or sell for third party development.</li> <li>• Replacing a functioning community facility with a private development is not in the spirit of community empowerment legislation and would be difficult to justify in terms of the legislative requirement for a presumption to agree transfer requests.</li> <li>• The transfer delivers a significant community benefit to remote rural community.</li> <li>• Reduced travel miles to events held at the nearest alternative venues (monetary and carbon saving).</li> </ul>	<p>Application</p>	<p>Strong</p>

	<ul style="list-style-type: none"> <li>No competing uses from other parties.</li> </ul>		
Ability of organisation to pay	ELKCAL has sufficient funds to cover the cost of purchase, legal fees and running costs	Annual Accounts	Strong
<b>Resourcing Assessment Summary:</b>		<i>Rating – Strong/ Moderate</i>	