



Policy Outline

ADAPTATIONS POLICY

Updated January 2010

OVERALL PURPOSE

West North West homes Leeds' Adaptations Policy outlines our approach to managing the Adaptations Service. It sets out the liaison arrangements between West North West homes Leeds and the Councils' Social Care Department (SCD).

It provides a link to West North West homes Leeds' Asset Management Strategy and sets our commitment to high quality service delivery with an aim of achieving sustainable communities, highly satisfied customers and value for money.

The adaptations policy should be read in conjunction with the vulnerability policy, cohesion and diversity policy and the customer involvement policy.

INTRODUCTION

West North West homes Leeds defines adaptations as minor and major works that will promote independence and safety in and around the home

West North West homes Leeds will ensure that:

- the factors taken into account when agreeing the outcomes will always include an assessment of :
 - the health and well being of the disabled person,
 - the cost of the work set against the budgetary provision,
 - the best use of the housing stock
- there is effective liaison with Social Care Department at all stages
- customers receive comprehensive information at each stage of the adaptations process and are involved as equal partners in agreeing outcomes
- there is a clear Appeals Process
- effective arrangements are put in place for personal Case Management and /or for managing and carrying out the works.

Our service standards

1. Depending on the type of work required, we will complete all minor adaptations within either 7 or 28 working days of customers reporting them to us.
2. We will tell you in writing within 5 working days that a recommendation for major adaptation works has been received from the Occupational Therapist.
3. We will tell you of our decision on major adaptation work within 25 working days of receipt from the Occupational Therapist. Where the work is not possible or appropriate, we will explain and confirm the reasons in writing and explore other housing options.
4. We will complete all major adaptation works, dependant on priority, within set timescales from receipt of the Occupational Therapist recommendations.

Priority 1 high priority adaptations 74 calendar days
Priority 2 medium priority adaptations 127 calendar days
Priority 3 low priority adaptations 220 calendar days
5. We will make sure work is carried out safely and that your home is left clean and tidy at the end of each day.
6. We will measure customer satisfaction with minor adaptations carried out in customers' homes.
7. We will measure customer satisfaction with major adaptations carried out in customers' homes.

PERFORMANCE MEASURES

We will monitor the implementation and delivery of services through the following indicators:

- Average length of time waiting for minor adaptations from receiving assessment to work beginning.

Against a target of 7 working days

- Numbers waiting for major adaptations
- Average time taken to complete adaptations for High priority.

Against a local target of 74 calendar days

- Average time taken to complete adaptations for Medium priority.

Against a local target of 127 calendar days

- Average time taken to complete adaptations for Low priority.

Against a local target of 220 calendar days

% of letters sent to the customer within 5 working days of receiving OT referral.

- % of decisions made within 25 working days.
- % of minor adaptation works completed within 3 working days.
- % of minor adaptation works completed within 28 working days.
- Customer satisfaction - minor adaptations
Year end target 97%
- Customer satisfaction - major adaptations
Year end target 97%
- 'Ring Ahead, Ring After' satisfaction for adaptations
Year end target 97%
- % Of adaptations completed within timescales for High priority
- % Of adaptations completed within timescales for Medium priority
- % Of adaptations completed within timescales for Low priority.

Adaptations Policy

1. Statement of Intent

West North West homes Leeds:

- 1.1 Aims to promote independence within the home where a need is identified
- 1.2 Will ensure effective liaison with Social Care Department(SCD)
- 1.3 Will ensure input into cross- sector, cross-service sharing of responsibility for performance, exchange of good practise and development of service improvement.
- 1.4 Will help all those involved in service delivery to commit to core service principles. Whilst some adaptation work can be routine, many cases can be complex and emotive for both Customer and staff. This is particularly the case where adaptations are being delivered for families with children. All adaptations works provided by WNWhL will offer an individual solution to the customers needs.
- 1.5 Recognises the demands of cost efficiency and budgetary constraints while delivering a service that is sensitive and responsive to client needs.

2.0 Outline of Service

West North West homes Leeds:

- 2.1 Has adopted the 'Social Model of Disability', rather than a medical model. This considers barriers presented by the environment, not just the client's impairment, and how these barriers can be removed. The model has been adopted on an inter-agency basis, shared by Leeds City Council, Leeds Primary Care Trust and Voluntary sectors partners.

2.2 Initial Requests and Actions

A request for adaptation can be received direct from a customer or via a third party, such as an advice and support service or other statutory agency. Requests should initially be made via Leeds City Council's Customer Contact Centre, telephone number: 0800 9151113 or Minicom 0845 1271113.

Customer Service staff will then refer the request to Social Care Department.

For new customers accessing homes within the WNWhL area, either via bidding through Choice Based Lettings or a direct management let offer, the following measures are in place to ensure access to Adaptations is maximised

- Advertise all properties where adaptations have been installed as part of the 'Leeds Homes' weekly magazine and on the 'Leeds Homes' web pages.
- Rehousing applications include a section asking applicants to identify disabilities and adaptation requirements.
- Early identification of applicant(s) with adaptations needs bidding for properties within the WNWhL area and referral for an Occupational Therapist (OT) assessment.
- Proactive matching of applicants (with adaptations needs) to adapted properties in the WNWhL area. This is carried out through joint working between the Voids and Lettings Team and the OTs.
- Wherever there is a direct management let property, early intervention and an OT assessment is undertaken to identify suitability of property prior to finalising the offer.
- Applicants whom have received a rehousing priority due to a medical rehousing need will be visited by the in-house OT to assess and make recommendations on adaptations needs.

2.3 Responsibilities

- Statutory and local responsibilities for the Adaptations service are vested in:
- The 'Welfare Authority' : LCC Social Care Department (**SCD**) who carry out assessments and on-going case involvement for owner occupiers, or customers who rent from the Council or from another Landlord including LCC Housing Association rented properties

- Environment & Neighbourhoods, Environmental Health Division Adaptations Agency, for works to private properties including Housing Association rented properties
- West North West homes Leeds, for works and for re-housing of customers to council rented properties
- Environment & Neighbourhood Department's 'Strategic Landlord', who monitor performance in all sectors.

Leeds Social Care Department is responsible for:

- The assessment of applicants needs.
- The assessment will only cover access to essential facilities within curtilage of the property, and thus will not cover requests for on-road parking, scooter sheds and other environmental improvements.
- The assessments will consider other statutory requirements such as manual lifting regulations, and also input from others involved in supporting the disabled person, where appropriate.
- Retaining overall responsibility for ensuring the disabled person's needs are met if those needs were identified through a Community Care Assessment.
- Recommending works that are *"necessary and appropriate to meet needs"*.

West North West homes Leeds

- Is responsible for deciding whether it is *"reasonable and practicable"* to carry out the work being proposed as a solution to the need.
- Cannot 'fetter its discretion' by having a blanket policy on what it will or will not do but can adopt guiding principles. The SCD referral will suggest potential alternatives, and an alternative *must be considered* if the original solution is not considered reasonable and practicable.

2.4 Definitions and scope

- 2.4.1 Minor adaptations** are generally defined as those costing less than £1,000 and include items such as grab rails, hand rails, lever taps and door widening.

A request for minor adaptations will be directly dealt with by West North West homes Leeds, Adaptations Team. They are not generally referred through for SCD assessment.

If there is any uncertainty as to the value of an adaptation request, or as to what type of adaptation will meet the customer's needs. A recommendation will be made to the WNWhL Occupational Therapy Team.

2.4.2 Failed appointments for Minor Adaptations

If WNWhL partnering Contractors fail to keep an appointment without good reason, and do not let the customer know in advance, WNWhL will credit the customers' Rent Account with £10. This applies to our partnering contractors; Connaught and Kiers. Full details are available through WNWhL Compensation Policy (Failed appointments).

2.4.3 Major Adaptations are defined as those costing over £1000 and may include, for example:

- Portable or fixed ramps for property access
- Lifts – through floor lifts, stair lifts, platform lifts.
- General adaptations which include building work to enlarge doorways and improve circulation space within the home.
- Bathing facilities – wet floor showers, over-bath showers
- Provision of additional space – permanent or portable extensions
- Miscellaneous adaptations such as door entry systems, ceiling track hoists and environmental control systems
- Kitchen installations – adaptations can range to meet the needs of customers.

This list is not exhaustive as it the responsibility of Social Care Services, and West North West homes Leeds to determine what adaptation recommendations are appropriate.

2.4.4 Major adaptations: SCD Assessments

All major works are based on an Occupational Therapist Assessment. Over-bath showers may be recommended by e-mail, all other works will be recommended in writing signed by the Occupational Therapist (OT) or Disability Team Manager to West North West homes Leeds and shall include:

- personal details
- date of birth
- nature of needs
- recommendations of works considered necessary and appropriate

A Referral to SCD will first be assessed by the Initial Response Team (IRT). The IRT will determine whether the client is a new or existing user of Community Care Assessment services (CCAs) and whether a detailed OT Assessment is necessary. The Initial Response Team will then pass the case to the relevant OT Team:

- To the Area Team – for adults
- To the Children's Team – for families with a disabled child or children

Or signpost the client to other appropriate support if a detailed assessment is not considered necessary.

The receiving team will then undertake a Community Care Assessment to consider the needs of the applicants and the ways in which these can

be met. This may include provision of equipment or a recommendation for property adaptations to allow the disabled person to use essential facilities. An OT may visit the applicant in their home or may conduct a telephone assessment. The latter is more likely where the customer is known to SCD and thus the OT may already have a good understanding of his/her needs.

In situations where the OT Team may be very familiar with the applicant's circumstances, there may be no need for detailed assessment. In other cases the assessment may involve extensive liaison with the client and include the assessment of 'whole family' needs such as the complementary needs of other family members.

2.4.5 Major Adaptations SCD Recommendations and liaison

On completion of the Community Care Assessment, the OT will place the client in a High, Medium or Low risk priority. The Assessment will take into account a range of factors including the nature of the client's impairment, extent of difficulties in accessing essential facilities and need to facilitate care.

The OT will then make recommendations. If necessary liaison will take place with West North West homes Leeds in an attempt to identify the most appropriate option or action in order to progress to the next stage.

The OT Team will formulate recommendations

Recommendations may include:

- No action required – Case closed
- Refer to West North West homes Leeds for minor adaptation
- Refer to West North West homes Leeds for major adaptation
- Refer to West North West homes Leeds for re-housing

Each recommendation will be prioritised by the OT manager in line with the following definitions:

- **Low – a general priority which should be used unless there is evidence to demonstrate Medium or High priority criteria are met.**
The environmental barriers present a *critical, substantial moderate or low risk* to the disabled person's independence and/or the carer's safety, where appropriate, short term solutions have been implemented and care plan can be maintained
- **Medium – the priority when risk is higher and it is considered there is a limit to how long the care plan can be maintained without the adaptation** The environmental barriers present a *critical or substantial risk* to the disabled person's independence and /or the carer's safety but can be managed for a maximum of 6 months by the use of short term solutions.

- **High – the priority when risk is at a critical level and the care plan can not be delivered without the adaptation** The environmental barriers present a critical risk to the disabled person's independence and/or to the carer's safety, **and** cannot be reduced to an acceptable level by short term solutions

For each outcome, the OT Team will be responsible for informing the customer by letter of the outcome and the next stage, if any.

2.5.4 Major Adaptations – West North West homes Leeds Assessment Processes

All referrals will be considered in the first instance by West North West homes Leeds' Adaptations lead officer.

All major works will require a property survey and a decision as to whether the adaptation work proposed is considered 'reasonable and practical'. If it is determined that it is not, an alternative will be identified. This alternative may be to recommend re-housing to a property that is already adapted or that would be more 'reasonable and practical' to adapt. West North West homes will not refuse the recommendation and take no further action

In order to make this determination, West North West homes Leeds' Adaptations lead officer will collate the following information:

- That the applicant is living at the property
- The type of property
- The size of property
- The value of any major work carried out to the property within the last 5 years, including work through the Decent Homes programmes.
- The physical feasibility of carrying out the recommended adaptations
- The cost of the recommended adaptations
- The potential for reducing the cost by considering alternative adaptations.
- The potential for reducing the cost by re-housing the applicant to a property more suited to the requested adaptations
- The potential for reducing the cost by re-housing the applicant to a property already adapted.
- The impact on the client and his/her family members of any potential action

If West North West homes Leeds recommends re-housing of the customer as an alternative to carrying out adaptations in situ, a range of factors will be considered. This decision will not be taken on financial grounds alone; the impact on the quality of life of the applicant will also be taken into account.

2.5.5. Extensions/Adapta Units

West North West homes Leeds believes that all people should expect to be able to use the normal range of household facilities irrespective of any impairment.

Our role is to distinguish between facilities that meet need and facilities which families would like to have but which are not required to enable the disabled person to live in that property.

Extensions may be recommended by SCD where additional space is required or a person is unable to access an existing bedroom or a bathroom and these facilities cannot be made available by other means such as a through-floor lift.

If, following a SCD Assessment, a recommendation for an extension is received, West North West homes Leeds will review the recommendation and undertake a feasibility study. If it is deemed feasible to extend, West North West homes Leeds will prepare and submit a report outlining the proposals to West North West homes Leeds' Services and Investment Committee. If and when approval is granted the appropriate drawings will be submitted for planning permission etc

2.6 Adaptations outside the property

Under current legislation West North West homes Leeds will provide adaptations inside a property, or to those that improve physical access to a property, such as a ramp, in-curtilage parking and more recently access to garden space based on formal recommendation from an OT.

SCD is responsible for assessing physical barriers that may restrict access to your property. However, it does not assess solely for external works such as:

- Mobility scooter sheds
- Mobility scooter ramps
- Dropped kerbs
- Disabled parking bays

However for those individuals who are in receipt of high rate Mobility Allowance consideration and discretion may be given to these provisions

2.6.1 Provision of sheds for Scooters

A number of people are currently buying scooters because they see as an alternative to using public transport.

West North West homes Leeds does not have a responsibility or duty to provide scooter access or storage and would advise customers to consider this prior to purchasing a scooter.

West North West homes Leeds may consider carrying out this type of work, but under normal circumstances any work of this type will only be done in conjunction with other adaptations works.

West North West Homes Leeds advises customers to apply in writing prior to buying a scooter shed or constructing a ramp.

West North West Homes Leeds will offer advice on access and location of the shed or ramp.

2.7 Re-housing

A decision to re-house a customer rather than adapting his/her existing property will be made in full consultation with the referring OT and West North West homes Leeds and may require a case conference to consider options.

The decision to re-house will take into account the impact of moving on the customer, including the impact on other family members, and the likely availability of properties that meet the customer's physical, social and emotional needs. It should also take into account any timescale imposed by life limiting conditions and the consequent quality of final life years.

West North West homes Leeds is responsible for:

- Actively working with the customer to seek an alternative property
- Regularly reviewing the progress of re-housing to ensure it is achieved within a reasonable timescale. 'Reasonable timescale' will vary and dependant on the needs of the client and the type of property being sought.
- assist customers in identifying suitable properties and, if necessary, with the bidding process.
- Carry out a case review on a quarterly basis; with a copy of the recorded reviewed assessment in the tenancy file. The purpose of the review is to identify any change in client circumstances and also any change in other factors that may affect the progress of re-housing, such as property availability.
- arrange a case conference on an annual basis, involving the lead officer, customer, referring OT and any other involved agencies and carers. The purpose of this meeting will be to review the case as at the quarterly review but also to consider whether re-housing remains the best option in view of time elapsed since original decision.

If it is recommended that a customer who is an existing Council tenant requires rehousing, the originating ALMO will be responsible for any costs incurred for the adaptations required to the new property. This will apply even if the customer relocates to another ALMO.

*This will only apply in cases where the customer is rehoused as a direct result of their adaptation needs
If a tenant transfers to another ALMO and subsequently applies for adaptations this will then be the responsibility of the new ALMO.*

2.7.1. The Lettings process

Empty properties that have already been adapted will be identified as such in property advertising and will only be open to bids from customers in need of the relevant adaptations.

West North West homes Leeds will provide support to the client in identifying suitable properties and in making bids. Our Lettings Team may use 'Direct Lets' as a tool for ensuring the re-housing needs of a disabled customer are met within a reasonable timescale.

West North West homes Leeds will utilise its own OT to assess the suitability of properties to be offered in order to minimise delays in letting vacant properties.

The following may be taken into account when deciding whether, or not, re-housing is a more reasonable option:

Customer

- The customer would not be significantly adversely affected by moving. For example, if re-housing would be to an area where the applicant maintains support networks.
- The needs of the customer's family must be taken into account. For example, the impact of re-housing on the schooling of the client's children or siblings.

Property

- The suggested adaptations are not structurally possible.
- The property has already been improved in the last five years and the suggested adaptation would result in the removal or significant alteration of such a recent improvement. (For example; if a new kitchen and bathroom had recently been installed, it may not be considered reasonable to remove these).
- There are properties, which would suit the applicant's needs without any adaptation. For example; moving to a property with two 'reception rooms' rather than building an extension, or moving to a bungalow rather than providing a lift.
- There are properties that could be adapted at less cost than the applicant's existing property. For example; larger properties or those of different layout.

Cost

- If the cost of the work exceeds £30,000, although this should not be a sole deciding factor

Alternative Property

- A suitable alternative property is likely to become available in a timescale that is sympathetic to the customers' needs. This is especially important where the customer may have a life-limiting condition and the quality of final years should be paramount.

The factors considered in making this re-housing decision will be clearly recorded, as these may be referred to in any subsequent appeal

2.8 Relationships with other programmes

When preparing Capital Improvement programmes, West North West homes will consider whether there are opportunities for including adaptation work on a planned basis.

- Identifying individual needs during tenant liaison visits for Decent Homes works and incorporating these into the improvement works for an individual property
- See 2.5.4 for guidance

2.9 Carrying out the work

West Leeds West homes Leeds will identify an officer to act as the main contact point for all work to be carried out. This will usually be a surveyor, although a contractor may take on this role.

The Surveyor or contractor will agree a project outline with the customer. This should identify start and end dates of works as a minimum. For complex works, the Surveyor will build in a review with the customer to ensure on-going customer satisfaction.

2.9.1 Identifying a contractor

West North West homes Leeds will hold full details (contract specification, contact points, prices) for relevant contractors. This will usually include West North West homes Leeds' partner repair contractors and city-wide specialist contractors for items such as lifts and hoists.

For customers with special needs, all operatives will be issued with a brief summary of these needs. For example: the potential impact of disturbance on autistic children, any hospital visit routine, potential impact on health from dust and debris.

If work is required that does not fall within the parameters of an existing contract, West North West Leeds will arrange for the specification and procurement of work, using the relevant procurement rules.

2.9.2 Designing the work

The Project Manager will ensure that the following parties are involved in the design of work:

- Customer
- Referring OT
- Contractor

Other relevant parties should also be consulted as appropriate, for example; Sheltered Housing Wardens, family or friends who provide support.

Some design work may be carried out directly by West North West homes Leeds' partner repair contractors, such as wet floor showers.

2.9.3 Temporary re-housing

The OT is responsible for advising West North West homes Leeds whether the customer needs temporary re-housing for the duration of the work. Every effort will be made to keep a family unit together, although this may not always be possible e.g. if one family member has high care needs.

The cost of any temporary re-housing will be negotiated with all parties concerned.

2.10 Customer and OT liaison

The effective input of the customer and the OT into the design of work is crucial. This is particularly the case for families of a disabled child, where parents will have the best understanding both of the disabled child's needs and the needs of other family members.

Health and Safety may be particularly important in the context of a disabled child's behaviour. For example, electric sockets may need to be placed well out of reach of a child with no sense of danger.

OT's and parents may not have a clear diagnosis of the future needs of the child, especially where the child is still quite young. They may wish to see flexibility in design to allow for future needs.

Disability sometimes presents a need for extensive equipment such as wheelchairs, walking frames, electric beds etc. Available space and storage space will be considered in the design. For example, in a small house, a through the floor lift may solve one problem but create another by reducing mobility elsewhere in the house. The needs of the whole family will be considered, such as the need for siblings to have privacy and quiet.

2.11 Appeals Process

It is an underlying principle of this Policy that a consensus approach to outcomes should be achieved. The decision on whether to re-house the customer, carry out adaptations to the customer's existing home and recommendations on the type and extent of adaptations to be provided, will be made with in consultation with West North West homes Leeds, the customer and the referring OT.

However, there are conflicting priorities within the process, not least the West North West Leeds' responsibility to manage a limited capital resource and to make best use of stock set against the desire to provide a sensitive, client orientated service. Where these conflicting priorities result in an inability to achieve consensus, the Appeals Process should be used.

2.11.1 What can the customer appeal against?

Customers can appeal against decisions that have been made by the West North West homes Leeds with regard to works that are “necessary and appropriate” and “reasonable and practical” under the mandatory eligible works under the HGCR 1996. All complaints and enquiries with regard to other aspects of service delivery should be handled through West North West homes Leeds’ Compliments and Complaints process.

In assessing the “reasonable and practical” nature of the OT’s requirements, it may become apparent that a cost effective solution in the customer’s home is difficult or impossible to achieve. In these instances West North West homes Leeds will work closely with the applicant(s) and liaise with other public and private housing bodies to discuss re-housing options.

2.11.2 The Adaptation Appeal Panel Procedure

The customers’ written complaint will be acknowledged, informing the client of the next Panel hearing date when the case will be heard and a subsequent timescales of events.

Each case will be presented to the Panel by the appropriate Occupational Therapist or a West North West homes Leeds representative. The case will give a full account of the circumstances including any references to legislation, relevant guidance, including this Policy, or other relevant information to the application.

Following the presentation of the case, the customer (or their nominated representative) will be invited to expand on their written submission if they wish to do so. The Panel should then examine the information presented and be able to question any persons present to aid them to make a final judgment in the case.

After the Panel has met, the customer will be informed in writing of the decision of the Panel, requesting whether the customer wishes to proceed with the proposed scheme. The letter should contain contact details of the Ombudsman’s Office should the customer wish further recourse if they are dissatisfied with the outcome.

2.11.3 Composition of the Panel

West North West homes Leeds Adaptation Appeal Panel is made up of the following members:

- External Representative to Chair the Panel
- Department of Adult Social Care Director or nominated Deputy
- Department of Environment and Neighbourhoods Director or nominated Deputy
- West North West homes Leeds Chief Executive or nominated Deputy

Other persons present at the Panel hearing would be:

- Presenting Officer

- The customer and/or their nominated representative (if they wish)
- Other Officers with a professional interest in the case
- Legal Adviser (if necessary)
- Appeal Panel Coordinator

3.0 Specific Needs

- 3.1 West North West homes Leeds will take into account the specific needs which may arise of older, vulnerable, disabled people and black and minority groups in a manner that promotes equality and inclusiveness ensuring all customers are treated equally and fairly taking into account race, disability, gender, gender identity, sexual orientation, age and religious belief.

4.0 Consultation

- 4.1 Consultation on West North West homes Leeds' Adaptations Policy has taken place with customers through the Asset Management Customer Sounding Board, contractors and other key stakeholders. No adverse comments were received.

5.0 Implementation

- 5.1 The Head of Property Investment is responsible for ensuring that this Policy is implemented.

It is the responsibility of all West North West homes Leeds' employees to ensure that their work is carried out in line with this Policy and the procedures relating to it.

West North West homes Leeds will introduce all the necessary information and procedures into all our training packages with staff.

6.0 Monitoring

- 6.1 West North West homes Leeds will monitor and manage the contractor performance and customer satisfaction levels to ensure that all customer groups are being considered to assist West North West homes Leeds in the development of healthy neighbourhoods and communities.

7.0 Review

In preparation for delivering this policy during 2009 West North West homes Leeds has reviewed and taken into account new or emerging government legislation government and council policies.

As a result, this policy now fully reflects, and is inclusive of the issues arising from those policies and legislation, and considers the impacts arising.

The revised policy therefore reflects amendments to the following:

- 7.1 Performance measures have been reviewed for 2009/10 targets have been amended and additional measures added.
- 7.2 Levels of Priorities for adaptations have been changed to High, Medium and Low in line with Social Care Services priority classifications.
- 7.3 WNWhL have adopted the Leeds adaptations performance framework in respect of customers being re-housed to another ALMO within the Leeds area.

8.0 Legislation

- 8.1 New or emerging legislation and new policy for 2009 include:

The Chronically Sick and Disabled Persons Act 1970
The NHS and Community Care Act 1990.
The Housing Grants Construction Act (HGCRA) 1986
Regulatory Reform (Housing Assistance) (England and Wales) Order 2002
Asset Management Strategy
Duty of Repair - Section 11 of the Landlord and Tenant Act 1985.
Asbestos management Strategy
Tenant Support Policy
Vulnerability Policy and Strategy
Customer Care Strategy
Complaints/Compliments Policy
Value for Money Strategy
Procurement Strategy
Cohesion and Diversity Strategy
Financial Strategy
Access to Services Strategy
Customer Involvement Strategy

