

Equality and Safety Impact Assessment CYP1

The **Public Sector Equality Duty** (Section 149 of the Equality Act) requires public bodies to have due regard to the need to eliminate discrimination, advance equality of opportunity, and foster good relations between different people carrying out their activities.

The Equality Duty supports good decision making – it encourages public bodies to be more efficient and effective by understanding how different people will be affected by their activities, so that their policies and services are appropriate and accessible to all and meet different people’s needs. The Council’s Equality and Safety Impact Assessment (ESIA) includes an assessment of the community safety impact assessment to comply with Section 17 of the Crime and Disorder Act and will enable the Council to better understand the potential impact of proposals and consider mitigating action.

Name or Brief Description of Proposal	Review and redesign early help and outreach preventative services, to deliver a more focussed locality based model which prevents children becoming looked after by the council.
Brief Service Profile (including number of customers)	
<p>There are approximately 63,000 children and young people aged 0-19 living in Southampton. The council and the NHS provide a number of services for children and families and, since 2013, have increasingly worked together to offer more joined up prevention and early help services.</p> <p>In 2017, a Locality Based 0-19 Early Help and Prevention service was introduced that included a mix of universal services (meaning they are open to everyone who wants to use them), and more targeted, intensive support for children and young people with additional needs, or whose home life makes them vulnerable to poor outcomes. This element supports approximately 950 children.</p> <p>Services include Sure Start Children’s Centres, health visiting, school nursing, Families Matter and the Family Nurse Partnership. There are also links to other services such as maternity services, pre-schools, schools, colleges, GPs, children’s social care, services for children with special educational needs and/or disabilities (SEND), child and adolescent mental health services (CAMHS), and local community and voluntary sector organisations who support these communities.</p> <p>The service has been successful in offering advice and support to children and families, and we want to extend it to include more targeted support that can address issues such as complex parenting, challenging behaviours, supporting disabilities, welfare advice, mental health advice, domestic abuse and exploitation. The proposal is therefore to extend the model by bringing in more specialist and targeted health and social care, such as Educational Welfare, Inclusion and Targeted teams, Youth Offending and others which can provide early help and outreach preventative services.</p> <p>These specialist and targeted services are currently available, but have to be accessed separately. By delivering more services locally for families, we aim to</p>	

make them part of a community resource that is practical and easy to access. We also want to increase our partnership working with local community and voluntary services.

This will enable us to engage families at an early stage when they are facing challenges or need advice. It will also help to enhance the Families Matter service which focuses on strengthening and turning around families who are experiencing issues. Providing the right help early can stop problems getting worse or avoid issues altogether. Evidence shows that this can deliver better outcomes for children and families as well as saving money in the longer term as it avoids the need for more intensive, long term support. Therefore, it should ultimately reduce the number of children coming into statutory services with escalated needs, requiring the intervention of the council.

Summary of Impact and Issues

The enhanced Locality Based Support Service will extend the current model by bringing in additional health and social care services. It aims to ensure every child gets a good start in life and help children thrive in healthy and caring family settings, supported by their local communities.

The proposal is to deliver more services in a community based setting where people can access the local help they need as early as possible with the least amount of 'hand offs' or referrals, find their own lasting solutions to the challenges they face, and gain support quickly at point of crisis. Providing more early help and preventative services will:

- reduce the number of children requiring specialist input
- prevent children becoming looked after by the council
- reduce pressure on core teams
- reduce the number of young people excluded from school or put on part time timetables
- increase the percentage of families "turned around" through Families Matter
- reduce the rate of first time entrants into the youth justice system
- keep children and young people in the city, in permanent placements and where possible with their families
- increase opportunities for early intervention in domestic violence and abuse and extend restorative practice.

Delivering this model will require reviewing the services currently available in each locality, as well as the needs of children and families in those areas. We want to make sure that services are targeted where they are needed most, so the redesigned Locality Based Model will be based on local requirements and the services available may be different in each area. This means that some service users may not be able to access all services in their local area, and there may be a reduced offer in parts of the city, but all families will continue to be able to access universal services.

Potential Positive Impacts

The proposed service will have a number of positive impacts on children and families in Southampton:

- There will be a clearer offer for children and families and more services will be

<p>based locally.</p> <ul style="list-style-type: none"> • There will be less reliance on assessment or strict criteria of access and greater focus on targeted need and intervention. • Children and families will be able to access support and help with any challenges or issues more quickly. • Services will be more joined up and focused on the key issues that are challenging family stability and resilience. • There will be closer working relationships across the professional networks. • There will be greater opportunities to develop links with community and voluntary sector organisations. 	
Responsible Service Manager	Phil Bullingham, Service Lead: Safeguarding, Improvement, Governance and Quality Assurance
Date	8 February 2019
Approved by Senior Manager	Hilary Brooks, Service Director: Children & Families
Date	8 February 2019

Potential Impact

Impact Assessment	Details of Impact	Possible Solutions & Mitigating Actions
Age	<p>63,091 children and young people (aged 0-19) live in the city, and this is expected to grow by 4.5% by 2024 to 65,912 (2,821 children and young people).</p> <p>This proposal's principal direct impacts will be on children, young people and their parents and carers.</p> <p>Overall it is anticipated that the extension of the Locality Based model will have positive impacts on children and families. Some localities may experience a change in the specialist and targeted services available locally and so some children and families may not be able to access all services in their local area. This is because services will be based on local need and targeted where they are needed most. Therefore, there may</p>	<p>All families will receive the universal offer. Specialist services will also be accessible to those who need them, although in some cases children and families may have to travel out of their local area to access them. Where need is identified families will not be excluded on the grounds of their location, and transport options will be considered to enable those individuals to access services.</p>

Impact Assessment	Details of Impact	Possible Solutions & Mitigating Actions
	be a reduced offer in parts of the city.	
Disability	<p>There are some users of this service that have special educational needs and/or disabilities (SEND). The overall impact of extending this model should be positive in terms of its impact.</p> <p>Some localities may experience a change in the specialist and targeted services available locally and so some children and families may not be able to access all services in their local area. This is because services will be based on local need and targeted where they are needed most. Therefore, there may be a reduced offer in parts of the city.</p> <p>If specific specialist services are not available in a particular locality, some disabled children or parents may need to travel further to access services that might have previously been available in their locality.</p>	<p>The intention is to increase local availability of more specialist support. Where need is identified families will not be excluded on the grounds of their location, and transport options will be considered to enable those individuals to access services.</p>
Gender Reassignment	No identified impacts.	
Marriage and Civil Partnership	No identified impacts.	
Pregnancy and Maternity	Pregnant woman will be included as part of this model and so may receive more targeted support to help them prepare for parenthood.	
Race	22.3% of the city's population are non-White British, including 14% who are residents from Black or Minority Ethnic backgrounds.	All families will receive the universal offer. Specialist services will also be accessible to those who need them, although in some cases children and families may have to travel out of their local area to access them. Where need

Impact Assessment	Details of Impact	Possible Solutions & Mitigating Actions
		is identified families will not be excluded on the grounds of their location, and transport options will be considered to enable those individuals to access services.
Religion or Belief	No identified impacts.	
Sex	No identified impacts.	
Sexual Orientation	No identified impacts.	
Community Safety	No identified impacts.	
Poverty	The majority of looked after children in Southampton originally come from the 20% most deprived communities – 6.3 x higher than the 20% least deprived.	The council will continue to target resources to areas of greatest need.
Health & Wellbeing	If services reduce in some areas, this could have an impact on the socialisation of children and their parents/carers, and their health and wellbeing.	All families will receive the universal offer. Specialist services will also be accessible to those who need them, although in some cases children and families may have to travel out of their local area to access them. Where need is identified families will not be excluded on the grounds of their location, and transport options will be considered to enable those individuals to access services.
Other Significant Impacts	The impacts are likely to be positive for children and families as an enhanced locality offer will promote family stability. Early interventions and wrap around support should reduce the number of children needing to be looked after by the Local Authority and manage risk at an early stage.	

Equality and Safety Impact Assessment CYP2

The **Public Sector Equality Duty** (Section 149 of the Equality Act) requires public bodies to have due regard to the need to eliminate discrimination, advance equality of opportunity, and foster good relations between different people carrying out their activities.

The Equality Duty supports good decision making – it encourages public bodies to be more efficient and effective by understanding how different people will be affected by their activities, so that their policies and services are appropriate and accessible to all and meet different people’s needs. The Council’s Equality and Safety Impact Assessment (ESIA) includes an assessment of the community safety impact assessment to comply with Section 17 of the Crime and Disorder Act and will enable the Council to better understand the potential impact of proposals and consider mitigating action.

Name or Brief Description of Proposal	Review the council run play offer and seek community and voluntary sector partners to take over the direct running of the service.
Brief Service Profile (including number of customers)	
<p>The council’s Children and Families Service provides a range of services and support to help children and young people get a good start in life.</p> <p>One of those services is the ‘play offer’ which runs out of the council’s Sure Start Children’s Centres and allows children and families to access play sessions in a safe and contained space. These provide support for children and their parents/carers, helps develop community cohesion, provides parent and child socialisation and assists in school readiness.</p> <p>The council currently sets up, runs and facilitates play sessions in 7 centres across the city and these are staffed by council employees (approximately 20 staff). The number of children who are supported through the play offer varies. There are multiple play type sessions including some drop in sessions where the attendance can vary week to week. However, in October 2018, the average play session attendance was 15, and the current offer extends to an estimated 140 children.</p> <p>The council recognises the importance of these play sessions to children and their parents/carers. However, it is also important that council resources are targeted where they are needed most, and that we work with other public sector, private sector, voluntary and community organisations to deliver the best value and most joined up services.</p> <p>The proposal is, therefore, to explore opportunities for some play services to be run or co-run by local community volunteers and/or parent volunteers rather than council staff. The council and its partners will continue to coordinate and support the running of these groups, though will seek to handover some facilitation to capable and trained members of the community. Council staff will continue to run some targeted sessions if there are areas where it is not viable to deliver a community led play offer; in that case, these will be targeted to those areas with the greatest need. The council will also support work to develop the availability of play opportunities across the city.</p>	

Summary of Impact and Issues

Under this proposal, the council will seek to encourage community groups and individuals to take over the delivery and facilitation of play sessions in Sure Start Centres. There may be some areas where it is not viable to deliver a community led play offer because of the level/complexity of need or because community leaders cannot be sourced. In that case, council staff will continue to run some targeted sessions, in those areas where there are the greatest needs.

There are no planned closures amongst the seven Sure Start Centres, which currently deliver a play offer. However, as some services move to a community based delivery model, there will be a reduction in access to professional support during play sessions. Targeted services will still be in place via other routes for those parents/carers who need more support. It is also possible that some areas may see a reduced play offer (in terms of less hours, or potentially some services ceasing) if community leaders cannot be sourced, and council staff need to focus on other areas with a greater level of need.

We will train and support community volunteers over a period of time and will not hand over programmes to volunteers till such assurance is achieved. We will work in partnership with a voluntary network and will continue to support, train and coach the network.

This work will help address our objectives as it will target need and we will extend our resources by partnering with the community and the voluntary sector and ensure safeguarding matters are addressed.

Potential Positive Impacts

The delivery of a play offer through communities will strengthen and build partnerships between the council and communities.

Exploring innovative community led delivery models will enable the council to maintain services in parts of the city which potentially could otherwise see a significant reduction or ceasing of the play offer.

Responsible Service Manager	Phil Bullingham, Service Lead: Safeguarding, Improvement, Governance and Quality Assurance
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Date	8 February 2019
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Approved by Senior Manager	Hilary Brooks, Service Director: Children & Families
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Date	8 February 2019
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Potential Impact

Impact Assessment	Details of Impact	Possible Solutions & Mitigating Actions
Age	<p>There are 140 children currently using the Sure Start Children's Centre play offer.</p> <p>63,091 children and young people (aged 0-19) live in the city, and this is expected to grow by 4.5% by 2024 to 65,912 (2,821 children and young people).</p> <p>The successful development of a community led model would ensure that the play offer is maintained for children in the city. However, it is possible that services could reduce in some areas, which could have a negative impact on some children.</p>	<p>The council will work with individuals and community groups to explore opportunities for community groups and individuals to take over delivery and facilitation of play sessions.</p> <p>The council will continue to target resources to areas of greatest need, if community led delivery is not possible in these areas.</p> <p>The council will also support work to develop the availability of play opportunities across the city.</p>
Disability	<p>There will be a reduction in access to professional support during play sessions, which could have a greater impact on children with SEND and their parents/carers.</p>	<p>The council will continue to target its resources to areas of greatest need and this will require a specific focus on presenting demand around children's additional needs, including SEND. The offer across the City will be agile so as to respond to need across localities – bring a level of focus to high demand areas.</p>
Gender Reassignment	<p>No identified impacts.</p>	
Marriage and Civil Partnership	<p>No identified impacts.</p>	
Pregnancy and Maternity	<p>It is possible that some services may reduce in some areas, which could have an impact on the socialisation of children and their parents/carers, and have a greater impact on those with more than one younger child.</p>	<p>The council will continue to target resources to areas of greatest need, if community led delivery is not possible in these areas. It will still be possible to access professional support via other routes.</p>
Race	<p>No identified impacts.</p>	

Impact Assessment	Details of Impact	Possible Solutions & Mitigating Actions
Religion or Belief	No identified impacts.	
Sex	No identified impacts.	
Sexual Orientation	No identified impacts.	
Community Safety	No identified impacts.	
Poverty	The majority of looked after children in Southampton originally come from the 20% most deprived communities – 6.3 x higher than the 20% least deprived.	The council will continue to target resources to areas of greatest need, if community led delivery is not possible in these areas. It will still be possible to access professional support via other routes.
Health & Wellbeing	If services reduce in some areas, this could have an impact on the socialisation of children and their parents/carers, and their health and wellbeing.	The council will continue to target resources to areas of greatest need, if community led delivery is not possible in these areas. It will still be possible to access professional support via other routes.
Other Significant Impacts	None identified.	

Equality and Safety Impact Assessment CYP3

The **Public Sector Equality Duty** (Section 149 of the Equality Act) requires public bodies to have due regard to the need to eliminate discrimination, advance equality of opportunity, and foster good relations between different people carrying out their activities.

The Equality Duty supports good decision making – it encourages public bodies to be more efficient and effective by understanding how different people will be affected by their activities, so that their policies and services are appropriate and accessible to all and meet different people’s needs. The Council’s Equality and Safety Impact Assessment (ESIA) includes an assessment of the community safety impact assessment to comply with Section 17 of the Crime and Disorder Act and will enable the Council to better understand the potential impact of proposals and consider mitigating action.

Name or Brief Description of Proposal	Review the Contact Service which facilitates contact for Looked After Children with their birth families, with a view to this being delivered by a partner organisation
Brief Service Profile (including number of customers)	
<p>Southampton City Council runs a Contact Service which facilitates contact for our Looked After Children (LAC) with their birth families. The service supervises contact between approximately 300 Looked After Children and their families across varying time frames: some contacts are 3 or 4 times per week and some are once every 6 months. Demand for the service is high due to the numbers of cases being referred.</p> <p>The current service is costly in terms of staffing, time and physical resource. It employs 16 contact practitioners and requires complex coordination. It is also not flexible enough for our Looked After Children their families, as it only operates in core hours and is not able to meet urgent contacts or to facilitate out of area contact.</p> <p>The proposal is to review, scope and assess the benefits of the current Contact Service, with a view to it being delivered by a partner organisation. In doing so, the service has the potential to become more flexible, with a 7 day a week service across extended hours. Following the review, any changes that are anticipated to have an impact on service users will be subject to further consultation and/or engagement.</p>	
Summary of Impact and Issues	
<p>A full review will be undertaken to understand the options for delivering the Contact Service through another organisation, and the impacts of doing this. The detailed impacts would not be known until a delivery model is agreed with any organisation that might be interested in taking over this service. Once the review is complete, any changes that are anticipated to have an impact on service users will be subject to further consultation and/or engagement, including an updated Impact Assessment if required.</p> <p>At this stage, it is anticipated that another provider would be able to provide more flexibility in the locations that the Contact Service is delivered. A more flexible model would reduce logistical pressures for the service and make contact easier for</p>	

families. However, this would be subject to the delivery model of the provider and any contract/Service Level Agreements. This would be taken into account in the scoping and review, to ensure that the best balance of outcomes are achieved through the service being contracted out.

Potential Positive Impacts

- Clearer offer for families which are locality based.
- Extended hours offer
- Potential for 7 day service
- Flexible use of buildings
- Quicker response for families
- More cost efficient.
- Extended service could be used to assist in rehabilitation work and so reduce the numbers of LAC and the time they spend in care.

Responsible Service Manager	Phil Bullingham, Service Lead: Safeguarding, Improvement, Governance and Quality Assurance
Date	8 February 2019
Approved by Senior Manager	Hilary Brooks, Service Director: Children & Families
Date	8 February 2019

Potential Impact

Impact Assessment	Details of Impact	Possible Solutions & Mitigating Actions
Age	Around 300 children are supported by the Contact Service. These children could be impacted by any changes to the service.	<p>Following a review, proposals affecting service users will be subject to further consultation and engagement as appropriate.</p> <p>January 2019 - The current position of the Contact Service, on the back of recent review activity, shows that the service should be retained as a council led offer and that further review focus should be to improve the offer by aligning it closer to locality resources; so as to improve contact service experiences uniformly for all children, including those with SEND.</p>
Disability	Some children or parents being supported may have disabilities. These individuals could be impacted by any changes to the service. There is a potential positive impact if the service moves location, as this may improve ease of access.	
Gender Reassignment	No identified impact to date.	
Marriage and Civil Partnership	No identified impact to date.	
Pregnancy and Maternity	No identified impact to date.	
Race	No identified impact to date.	
Religion or Belief	No identified impact to date.	
Sex	No identified impact to date.	

Impact Assessment	Details of Impact	Possible Solutions & Mitigating Actions
Sexual Orientation	No identified impact to date.	
Community Safety	No identified impact to date.	
Poverty	No identified impact to date.	
Health & Wellbeing	No identified impact to date.	
Other Significant Impacts	No identified to date.	

Equality and Safety Impact Assessment CYP 4

The **Public Sector Equality Duty** (Section 149 of the Equality Act) requires public bodies to have due regard to the need to eliminate discrimination, advance equality of opportunity, and foster good relations between different people carrying out their activities.

The Equality Duty supports good decision making – it encourages public bodies to be more efficient and effective by understanding how different people will be affected by their activities, so that their policies and services are appropriate and accessible to all and meet different people’s needs. The Council’s Equality and Safety Impact Assessment (ESIA) includes an assessment of the community safety impact assessment to comply with Section 17 of the Crime and Disorder Act and will enable the Council to better understand the potential impact of proposals and consider mitigating action.

Name or Brief Description of Proposal	Reduce the funding provided to Compass School Pupil Referral Unit from 160 to 100, in line with actual demand.
Brief Service Profile (including number of customers)	
<p>Compass School is a Pupil Referral Unit (PRU), providing transitional, full time education and support for up to 160 pupils aged 5 - 16 who are not accessing mainstream schools. Permanently excluded pupils are referred directly to Compass School by the council’s Vulnerable Pupils Manager. Requests for dual registration places (where pupils are registered at another school as well) are made by mainstream schools via Southampton’s ‘In Year Fair Access’ or ‘Primary Heads Inclusion Group’.</p> <p>Since 2015, the number of PRU places to be funded has been determined by local authorities, taking into account any Alternative Provision (AP) required by their maintained schools and academies. Southampton City Council currently provides funding to Compass School for 160 pupils. Regardless of number who actually attend, in September 2018, there were only 67 pupils on the school roll. Although this number is likely to rise as the academic year progresses, the school has never reached its capacity of 160 full-time equivalent places.</p> <p>Therefore, the current funding for 160 full-time pupils is not required, both due to lower numbers using the provision than funded places and the fact that the majority of pupils are not receiving full time education and are on reduced timetables.</p> <p>There has been a national increase in referrals to PRUs. However, the number of pupils who reintegrate to mainstream education in Southampton, following a placement at Compass, is significantly lower than that of other similar sized local authorities. Therefore, Southampton City Council is working with mainstream schools to reverse this trend and support more pupils to stay in or reintegrate to mainstream placements.</p>	

We are therefore proposing to reduce the number of funded places in Compass School from 160 to 100 full-time equivalent from September 2019, to reflect actual numbers and demand.

Summary of Impact and Issues

The proposal is to reduce the number of full-time funded places in Compass School from September 2019, in line with actual pupil numbers.

To achieve this, and keep demand for PRU places low, there will be a greater focus on supporting pupils to stay in mainstream schools and reintegrating those who have been excluded. This will have an impact on mainstream schools and there will be increased expectations for schools to work restoratively in managing pupils with challenging behaviour. Restorative Practice training is being rolled out across the city, with some schools being ambassadors for this. As such, schools will be encouraged and supported to be more creative in delivering personalised curricula to pupils who would benefit from a less traditional style of teaching.

By remaining in mainstream schools, rather than being placed in Compass School, some pupils may experience a lesser availability of specialist resources than those which may have been available to them had they been placed in Compass School.

However, ensuring schools are able to address issues of concern sooner rather than later is better for pupils and better value for money. It is preferable to keep pupils in mainstream school if at all possible as permanent exclusion is strongly linked with negative outcomes. There is a wealth of data linking exclusion from school with academic underachievement, offending behaviour, limited ambition, homelessness and mental ill health.

Potential Positive Impacts

- Long term places in Compass School will be made available to those most in need of specialist support.
- There will be an increased focus on preventing exclusion and reintegration into mainstream schooling which will have positive impacts on the outcomes of children and young people.
- The proposal will include the development of preventative outreach programmes (particularly at secondary level).
- Increased numbers of pupils will be supported locally and within the mainstream through flexible provision.
- Specialist resources will be targeted to the most complex cases.

Responsible Service Manager	Derek Wiles, Service Lead: Education
Date	8 February 2019
Approved by Senior Manager	Hilary Brooks, Service Director: Children & Families
Date	8 February 2019

Potential Impact

Impact Assessment	Details of Impact	Possible Solutions & Mitigating Actions
Age	<p>In September 2018 there were 67 pupils aged 5-16 attending Compass School.</p> <p>The reduction in funding may have an impact on the level of service experienced by children attending the school.</p>	<p>Funding is being reduced in line with actual pupil numbers based on full-time equivalent places.</p> <p>Schools are increasingly developing a curriculum which meets the needs of a broader range of students, which will enable learners to access provision within mainstream education and reduce the need for places at Compass School.</p> <p>Pupil numbers will be kept under review with regular dialogue with the school. This will be carried out to ensure funding matches' needs based on full-time equivalent places.</p>
Disability	<p>100% of pupils in Compass School have special educational needs and/or disabilities (SEND) compared to a national average of 22%.</p>	<p>Frequent periods of change can have a detrimental effect on outcomes for young people with SEND. Therefore, the short-term nature of the placements at Compass may not be beneficial to this cohort. Sustaining placements in mainstream schools through early intervention will see pupils with SEND fully included in mainstream education.</p> <p>Having a needs-led, child centred approach to learning within mainstream schools will engage young people with SEND.</p> <p>Tailoring the curriculum within mainstream schools to meet the needs of these pupils will have a positive impact on outcomes.</p>
Gender Reassignment	No identified impact.	
Marriage and Civil Partnership	No identified impact.	
Pregnancy and Maternity	No identified impact.	

Impact Assessment	Details of Impact	Possible Solutions & Mitigating Actions
Race	No identified impact.	
Religion or Belief	No identified impact.	
Sex	No identified impact.	
Sexual Orientation	No identified impact.	
Community Safety	No identified impact.	
Poverty	No identified impact.	
Health & Wellbeing	No identified impact.	
Other Significant Impacts	No identified impact.	

Equality and Safety Impact Assessment CYP6

The **Public Sector Equality Duty** (Section 149 of the Equality Act) requires public bodies to have due regard to the need to eliminate discrimination, advance equality of opportunity, and foster good relations between different people carrying out their activities.

The Equality Duty supports good decision making – it encourages public bodies to be more efficient and effective by understanding how different people will be affected by their activities, so that their policies and services are appropriate and accessible to all and meet different people’s needs. The Council’s Equality and Safety Impact Assessment (ESIA) includes an assessment of the community safety impact assessment to comply with Section 17 of the Crime and Disorder Act and will enable the Council to better understand the potential impact of proposals and consider mitigating action.

Name or Brief Description of Proposal	Reduce Early Intervention Fund which supports early years and childcare providers to expand or set up new provision
Brief Service Profile (including number of customers)	
<p>The Early Intervention Fund supports early years and childcare providers to expand or set up new provision. In 2017/18, £166,100 was allocated for this purpose, and in 2018/19 £116,000 has been allocated. In 2017/18 1,400 new early education places across the city were secured with the support of the early intervention funding.</p> <p>Southampton City Council has a statutory duty under the Childcare Act 2006 and subsequent revisions to ensure there are sufficient early education places for 2, 3 and 4 year olds, and sufficient childcare places for working parents. The introduction of the 2 year old offer, the 30 hour offer and tax free childcare has led to a significant demand for more early education and childcare places. Currently, 96% of our 3 and 4 year olds (4,540 children) and 67% of eligible 2 year olds (around 1,400 children) access funded early education. There are 101 registered group early years’ providers in the city, across a range of private, voluntary, independent and maintained settings, plus around 200 childminders.</p> <p>Using the childcare sufficiency assessment, which takes into account population figures, housing and business developments and vacancy levels with current providers, providers are encouraged and supported to expand and set up new provision in areas of the city where there are insufficient places. This expansion and development is supported by the Early Intervention Fund.</p>	
Summary of Impact and Issues	
<p>The proposal is to reduce the funding allocated to the Early Intervention Fund to £15,000 per annum in 2019/20 and beyond.</p> <p>Providers will be encouraged to seek funding from other sources. The impact of the reduction in the funding may be that some early years and childcare providers will find it more challenging to expand or set up new provision. This may in turn</p>	

impact the number of places available across the city.

There are 15,826 children aged 0-4 in the city, and by 2024 this predicted to fall by 0.2% (30 children). However, demand for early education and childcare places has increased in recent years. This may continue, as only 67% of eligible 2 year olds are accessing funded early education, and there are currently insufficient places available in some areas of the city. A reduction in funding available from the council could have an impact on the number of places available in the city if providers are unable to attract funding from other sources to support expansion.

Potential Positive Impacts

Providers will be encouraged to seek funding from other sources, which may lead to sustainable future funding arrangements.

Responsible Service Manager	Derek Wiles, Service Lead: Education
Date	8 February 2019
Approved by Senior Manager	Hilary Brooks, Service Director: Children & Families
Date	8 February 2019

Potential Impact

Impact Assessment	Details of Impact	Possible Solutions & Mitigating Actions
Age	<p>49,513 children and young people (aged 0-17) live in the city, and this is expected to grow by 5.5% by 2024 to 52,246.</p> <p>There are 15,826 children aged 0-4 in the city, and by 2024 this predicted to fall by 0.2% (30 children).</p> <p>Demand for early education and childcare places has increased in recent years. A reduction in funding available from the council could have an impact on the number of places available in the city if providers are unable to attract funding from other sources to support expansion.</p>	<p>Southampton has always had a mixed model of early year's provision. With most national grants only being available to schools, the council will work with schools to encourage more of them to deliver early education. The council has a statutory duty under the Childcare Act 2006 and subsequent revisions to ensure there are sufficient early education places, so if insufficient places are available in future, the council will take appropriate action to address that.</p>
Disability	This proposal may mean that some	The council will work on

Impact Assessment	Details of Impact	Possible Solutions & Mitigating Actions
	<p>groups are unable to expand, therefore potentially meaning less places for children with special educational needs and/or disabilities (SEND).</p> <p>The costs of supporting a child with high-end additional needs in an Early Years setting is not completely covered by the early years funding formula, therefore providers may choose, if they have limited places, to prioritise taking children who do not need dedicated support. This could have a negative impact on SEND children and their families.</p>	<p>a case by case basis to identify suitable provision for 2, 3 and 4 year olds with special educational needs and/or disabilities (SEND).</p>
Gender Reassignment	No identified impact.	
Marriage and Civil Partnership	No identified impact.	
Pregnancy and Maternity	<p>Southampton has a birth rate of 53.2 births per 1,000 females aged 15 to 44 years. This is lower than the England average of 62.5 per 1,000 females.</p> <p>The number of children aged 0-4 in Southampton is due to fall by 0.2% (30 children) by 2027.</p> <p>However, demand for early education and childcare places has increased in recent years. A reduction in funding available from the council could have an impact on the number of places available in the city if providers are unable to attract funding from other sources to support expansion.</p>	<p>Southampton has always had a mixed model of early year's provision. With most national grants only being available to schools, the council will work with schools to encourage more of them to deliver early education. The council has a statutory duty under the Childcare Act 2006 and subsequent revisions to ensure there are sufficient early education places, so if insufficient places are available in future, the council will take appropriate action to address that.</p>
Race	No identified impact.	
Religion or Belief	No identified impact.	

Impact Assessment	Details of Impact	Possible Solutions & Mitigating Actions
Sex	No identified impact.	
Sexual Orientation	No identified impact.	
Community Safety	No identified impact.	
Poverty	<p>23.4% of children in Southampton live in poverty. Local data shows that only 37% of children living in the 10% most deprived areas of the city who do not attend early years provision reach the expected level in the Early Years Foundation Stage at age 5, compared with 59% who have attended for over 540 hours.</p> <p>Reducing the early intervention grant may result in fewer new places being made available to under 2s, as it is more costly to staff places for younger children.</p>	<p>The council will signpost providers who are considering expanding to national grants, and work with schools to encourage more schools to deliver early intervention. The council has a statutory duty under the Childcare Act 2006 and subsequent revisions to ensure there are sufficient early education places, so if insufficient places are available in future, the council will take appropriate action to address that.</p>
Health & Wellbeing	<p>If sufficient childcare places are not available, this may have an impact on the health and wellbeing of children and their parents.</p>	<p>The council will signpost providers who are considering expanding to national grants, and work with schools to encourage more schools to deliver early intervention. The council has a statutory duty under the Childcare Act 2006 and subsequent revisions to ensure there are sufficient early education places, so if insufficient places are available in future, the council will take appropriate action to address that.</p>
Other Significant Impacts	None identified.	

Equality and Safety Impact Assessment SHIL1

The **Public Sector Equality Duty** (Section 149 of the Equality Act) requires public bodies to have due regard to the need to eliminate discrimination, advance equality of opportunity, and foster good relations between different people carrying out their activities.

The Equality Duty supports good decision making – it encourages public bodies to be more efficient and effective by understanding how different people will be affected by their activities, so that their policies and services are appropriate and accessible to all and meet different people’s needs. The Council’s Equality and Safety Impact Assessment (ESIA) includes an assessment of the community safety impact assessment to comply with Section 17 of the Crime and Disorder Act and will enable the Council to better understand the potential impact of proposals and consider mitigating action.

Name or Brief Description of Proposal	Revise the Adult Social Care Charging Policy
Brief Service Profile (including number of customers)	
<p>Under the Care Act 2014, the council has discretion whether to charge for services to meet both eligible and non-eligible needs, except where it is required to arrange care and support free of charge.</p> <p>Southampton City Council has an Adult Social Care Charging Policy which sets out the charges that apply for non-residential care and support. Under this policy, the council charges for some services provided (care and support) where it is permitted to do so under the Care Act 2014 and carries a financial assessment (means test) to determine the amount an individual has to contribute towards the cost of their care and support.</p> <p>The council has, to date, exercised its discretion to not charge at all for some services and for other services has not charged the full amount to cover the actual service being delivered. The Care Act 2014 and associated relevant regulations set out the services that a local authority can and cannot charge for.</p> <p>The proposed policy aims to deliver a fairer and more equitable service, whilst ensuring that the services can remain sustainable in order to meet the needs of local people, now and in the future.</p> <p>The council has considered its duties and responsibilities under the Care Act 2014, the statutory guidance and regulations prior to putting forward this proposal. The council considers these changes are affordable and reasonably practicable for customers to pay and all charges will be clear and transparent.</p> <p>In cases of financial hardship the council always has the discretion to waive all or part of any charges on a case by case basis.</p> <p>The council proposes to make the following changes to its Adult Social Care</p>	

Charging Policy, which will affect approximately 700 people currently using services as well as future clients:

- 1) To introduce a new Arrangement Fee of £250 for people whose assets are over the capital threshold, currently £23,250, (and who therefore must pay the full cost of their care) but who request Southampton City Council to make the arrangements for their non-residential care (as is permitted under the Care Act 2014).
- 2) To take account of the higher rate Attendance Allowance and disability benefits (Personal Independence Payment and the care component of Disability Living Allowance) when assessing for financial contributions for non-residential care. This is in line with other local authorities. The difference between the higher and lower rate payments is currently £28.30 per week. This would now be taken into account when calculating an individual's income.
- 3) To make it clear that Southampton City Council will begin charging the assessed contribution from the first day that chargeable services are provided.
- 4) To increase charges for deferred payment scheme loans to reflect the actual costs of administering the scheme, and introduce an interest charge in line with the Care Act 2014.
- 5) To apply the charging policy to clients receiving social care support who were previously supported by the Locally Based Hospital Unit (LBHU) prior to its closure in 2011 (although during the consultation period it has become clear that these individuals will not be impacted by the proposal because of their complex health needs and their circumstances).

Summary of Impact and Issues

Southampton City Council currently supports approximately 2,600 people with care and support needs. The proposed Charging Policy will not impact on all of the existing clients but is likely to impact on approximately 700 clients.

The majority of the councils social care clients are older adults and would be considered to fall within the definition of having a disability.

Evidence shows that disabled people and older people have proportionately lower levels of income and could therefore experience a greater level of financial impact. The nature of the impact of the proposals will vary according to the specific proposal and will be mitigated by offsetting Disability Related Expenditure (DRE) against the assessed client contribution, where appropriate.

1. Arrangement Fee for non-residential care:

The proposal is to introduce an Arrangement Fee of £250 for people whose assets are over the capital threshold (currently £23,250 or more) and who ask the council to make arrangements for non-residential care on their behalf. A further charge of £250 would be made on each occasion the customer asks the council to arrange a new care package. Minor changes to existing arrangements will not be subject to a further charge, and the charge would only apply to major changes such as a change

in provider of care and support or a significant change in need requiring new arrangements.

This proposal is expected to have low impact and considered to be reasonably affordable for existing and future full-cost clients. Charges will not be applied before an individual has had every opportunity of being financially assessed to ensure their income and savings are above the capital threshold, (currently £23,250). All of these customers will have more than the higher capital threshold.

The key risk is that people, especially families and carers may be disinclined to request support for making arrangements from the council due to the arrangement fee.

A fee of up to £250 is considered affordable and reflects the administrative costs of making these arrangements, and will be payable each occasion that a customer makes a request to the council for a new care package (excluding minor changes to existing packages).

2. Take account of higher rate Attendance Allowance and disability benefits:

The proposed change is to include all forms of benefit payments (unless explicitly disregarded under the Care Act 2014, such as the mobility component of disability related payments) in the in the assessment of an individual's income. Historically, Southampton City Council has disregarded the higher rate of Disability Living Allowance or Attendance Allowance, equating to £28.30 (2018/19 rates). The mobility component of Attendance Allowance and disability related benefits will continue to be disregarded in line with legislation and guidance, and following consultation the proposal is to disregard all disability related benefits for individuals who are terminally ill and have been issued with a DS 1500 form.

Allowance will be made for Disability Related Expenditure (DRE) for care and support at home, and the equivalent amount of these costs will be disregarded when calculating an individual's income. DRE, which would take into account all additional disability related costs, including where relevant, any night time care costs that the council is not meeting will not be included as income in the financial assessment. Each individual's disability related expenditure will be assessed on a case by case basis.

There were just over 700 clients in receipt of higher rate disability related benefits at the time of the consultation which, subject to financial assessment, may be affected by the change. Approximately 400 were aged over 65, the majority being female in receipt of the higher rate care component of Attendance Allowance. The remaining 300 were adults aged 18 to 64 receiving higher rate disability benefits and of mixed gender.

It was not possible to determine the exact number of people impacted by this proposal during the consultation period. This is because individual's income and disability related expenditure will differ and only through an assessment under the new policy would it be possible to confirm who and how many people it will affect.

There is a risk that clients choose to reduce or cancel care and support as a result of

the proposal being implemented. This could have an adverse impact on health and wellbeing on the individual and on their carer(s), family members and/or friends who may have to give additional care and support.

The overall assessment of Southampton City Council is that the impact will be minimised through the financial and disability related expenditure assessments so that people are not disadvantaged, especially where they have additional needs and costs directly related to their disability.

3. Charges start from the date the service commences:

Under the current policy, people are not charged for services they are getting prior to completing a financial assessment. This proposal will enable the council to align charges and payments with services provided, from the point at which they start being provided. This will mean that recipients of support may have to commence payment earlier than at present, and therefore pay more overall. This proposal will not impact on existing clients and only affect new clients when the policy is implemented.

The impact analysis shows that an average of 294 new clients a year will require a chargeable non-residential care services. The average weekly contribution for a new client receiving non-residential services at the time of the consultation was £83.47 but with an average 7 weeks each client has services before completing a financial assessment, it is estimated that the new policy would result in new clients paying on average, £581 more towards the cost of their care services.

The main concern from the consultation feedback was that the proposed policy would put people at risk of getting into debt, especially when there is a significant length of time between starting a service and completing the financial assessment.

Following consideration of the representations made in the consultation, the proposal is to amend the draft policy to confirm that in cases of lengthy financial assessments, charges will not apply to a period any longer than 8 weeks prior to the notification date of the completed financial assessment.

4. Deferred payment scheme loans:

The Deferred Payment Scheme (DPS) is designed to prevent people from being forced to sell their homes in their lifetime to meet the costs of their residential care. Deferred Payment Arrangements are effectively loans which enable adult social care clients to use the value of their homes to help pay residential care home costs. The council supports an average of 15 customers a year through the DPS scheme.

The proposal is to increase the charges that council makes to cover the cost of the service. Southampton City Council currently charges a one of administration fee of £250 which does not align to the actual costs of the service.

Local authorities must set their administration charge at a reasonable level and this must not be greater than the actual costs incurred by the local authority. Therefore Southampton City Council is proposing to increase the one off set up fee for people using the Deferred Payment Scheme, to cover administrative costs, to £730.

Following consideration of the representations made in the consultation, Southampton City Council is no longer proposing to introduce an annual administration fee.

The council is also proposing to start charging interest on the deferred amount for the whole period that the agreement is in place. The interest will form part of the total overall amount owed to the council. The council is proposing to charge interest at the maximum level amount allowed under the Care Act 2014.

This proposal will affect new DPS arrangements only and will not affect people with existing loans.

5. To apply the charging policy for clients receiving social care support who were previously supported by the Locally Based Hospital Unit (LBHU) prior to its closure in 2011:

The consultation proposed that the council would apply the new charging policy to everyone receiving chargeable social care and support services. This may have affected up to 25 people who, until 2011, lived at the Locally Based Hospital Unit (LBHU), at which time the responsibility transferred from the NHS to the council.

This proposal may have impacted up to 25 clients who were previously residents of the LBHU. All 25 clients affected by the proposal were supported by independent advocacy as well as Deputies for Property and Financial Affairs for those who had them to engage in the consultation process as much as they were able.

Assessments were carried out for each individual to understand the impact of the proposal.

These assessments have shown that by virtue of their significant and complex health care needs, these individuals would not in any case be affected by this proposal and, on the basis of their current circumstances, they would not be assessed as requiring to make any contribution towards the cost of their care.

These individuals will continue to receive regular individual assessments to ensure that the arrangements for funding their care and support are made in accordance with the Adult Social Care charging policy, arrangements for Continuing Healthcare and other relevant policies.

It has not been necessary to make any changes to the draft policy, as these individuals will not be impacted by the proposal.

Potential Positive Impacts

For all groups, these changes help to ensure that the council can continue to help as many people with care and support needs as possible within the limited resources available. To this extent there should be a positive impact overall, as resources will be distributed more equitably.

Responsible Service Manager	Lee Fermandel, Service Lead: Adult Social Care Improvement
Date	8 February 2019
Approved by	Paul Juan, Service Director: Adults, Housing & Communities.

Senior Manager	
Date	8 February 2019

Potential Impact

Impact Assessment	Details of Impact	Possible Solutions & Mitigating Actions
Age	<p>Older people are disproportionately highly represented in the adult social care customer group and therefore older people will be impacted by these proposals.</p> <p>Within the customer group it is the older customers that are more likely to have the type of capital assets that these proposals take in to account.</p> <p>Within the client group itself the proposed changes will apply equally regardless of age, and these proposals could therefore impact customers of any age.</p> <p>Older people impacted are likely to experience a negative financial impact as a result of the proposals.</p>	<p>A full review of all charges, and the risks associated with the each proposal impacting on older people has been undertaken which includes mitigating actions, where appropriate, under each proposal.</p> <p>All representations made during the consultation have been taken into account and used to inform the final version of the draft policy and recommendations to council.</p> <p>Customers and their families will be provided with advice and information including details of local advice agencies which will provide financial advice where relevant.</p>
Disability		
To introduce a new Arrangement Fee of £250	<p>All of those individuals affected by this proposal will have a disability.</p> <p>The key risk is that people, especially families and carers may be disinclined to request support for making arrangements from the council due to the arrangement fee.</p>	<p>Those with income and savings below £23,250 will not be subject to the charge.</p> <p>In exceptional circumstances, the council will consider options to defer, suspend or waive the charge.</p>
To take account of the higher rate Attendance Allowance and disability benefits	<p>Up to 700 people may be impacted by the proposal.</p> <p>Clients could choose to reduce or cancel care and support as a result of the proposal being implemented.</p>	<p>Everyone directly affected by this proposal will be financially reviewed. This will include a benefits check and an offer of a Disability related Expenditure (DRE)</p>

Impact Assessment	Details of Impact	Possible Solutions & Mitigating Actions
	<p>This could have an adverse impact on health and wellbeing on the individual and on their carer(s), family members and/or friends who may have to give additional care and support.</p>	<p>assessment/ re-assessment so that all of their allowable disability related expenditure is taken into account, including where relevant, night-time care costs that are not met by the council.</p> <p>In cases where a client chooses not to undergo a DRE assessment, the council will make every effort to take into account the person's disability related costs within their financial assessment. In doing so, the council may use relevant information such as the person's care needs assessment, care plan and/or review to inform the amount of money, if any, the council will include as DRE within the financial assessment.</p> <p>The council will continue to disregard the mobility component of disability related benefits in line with legislation.</p> <p>If an individual does not intend to continue using a service as a result of the changes then they will be offered a strengths-based assessment.</p> <p>The council will disregard disability related benefits for people who are terminally ill and have been issued with form DS 1500.</p> <p>In exceptional</p>

Impact Assessment	Details of Impact	Possible Solutions & Mitigating Actions
		<p>circumstances, the council will consider options to defer, suspend or remove charges where the charges might create financial hardship.</p> <p>A review and appeals procedure is in place in cases where people disagree with their financial assessment.</p>
Charges start from the date the service commences:	<p>There is a risk that some individuals face financial hardship if they are required to pay backdated contributions following lengthy financial assessment period.</p>	<p>Southampton City Council will undertake financial assessments as swiftly as possible to avoid any undue delay</p> <p>In cases of lengthy financial assessments, charges will not apply to a period any longer than 8 weeks prior to the notification date of the completed financial assessment.</p> <p>The council will ensure people are offered a light-touch financial assessment to minimise delay and offer appropriate support to engage in the assessment.</p> <p>In exceptional circumstances, the council will consider options to defer, suspend or remove charges where the charges might create financial hardship.</p>
To increase charges for deferred payment scheme loans to reflect the	<p>For some people, the set-up charge and introduction of an interest charge may deter them from utilising the scheme.</p>	<p>The recommendation to apply administration charge of £305 is not being taken forward following consideration of the consultation representation.</p>

Impact Assessment	Details of Impact	Possible Solutions & Mitigating Actions
<p>actual costs of administering the scheme, and introduce an interest charge in line with the Care Act 2014.</p>		<p>In exceptional circumstances, the council will consider options to defer, suspend or remove charges.</p>
<p>To apply the charging policy for clients receiving social care support who were previously supported by the Local Hospital Base Unit (LHBU) prior to its closure in 2011</p>	<p>This proposal would impact 25 clients who were previously residents of the LHBU. This proposal could have negative financial impacts on these clients.</p>	<p>All 25 clients affected by the proposal were supported by independent advocacy as well as Deputies for Property and Financial Affairs for those who had them to engage in the consultation process as much as they were able. Assessments were carried out for each individual to understand the impact of the proposal.</p> <p>These assessments have shown that by virtue of their significant and complex health care needs, these individuals would not in any case be affected by this proposal and, on the basis of their current circumstances, they would not be assessed as requiring to make any contribution towards the cost of their care.</p> <p>These individuals will continue to receive regular individual assessments to ensure that the arrangements for funding their care and support are made in accordance with the Adult Social Care charging policy, arrangements for Continuing Healthcare and</p>

Impact Assessment	Details of Impact	Possible Solutions & Mitigating Actions
		other relevant policies.
Gender Reassignment	No identified impacts.	
Marriage and Civil Partnership	No identified impacts.	
Pregnancy and Maternity	No identified impacts.	
Race	No identified impacts.	
Religion or Belief	No identified impacts.	
Sex	<p>There is a higher proportion of female clients who are currently receiving social care support from Southampton City Council.</p> <p>Women are more likely to be carers, and more women could feel compelled to provide unpaid care if deterred from seeking help from the council due to charges.</p>	<p>The council will comply with its duties under the Care Act 2014 which confirms that any charge should be reasonable and affordable, and sex is not a contributing factor to the assessment of charges.</p> <p>Carers will be signposted to support where appropriate.</p> <p>The council will use its discretion to waive all or part of any charge if it is likely to cause undue hardship on a case by case basis.</p>
Sexual Orientation	No identified impacts.	
Community Safety	No identified impacts.	
Poverty	There could potentially be an impact as increasing charges and making new changes have an adverse financial effect on some clients.	Everyone directly affected by this proposal will be financially reviewed. This will include a benefits check and an offer of a Disability related Expenditure (DRE) assessment/ re-assessment so that all of their allowable disability related expenditure is taken into account, including where relevant, night-time care costs that are not met by

Impact Assessment	Details of Impact	Possible Solutions & Mitigating Actions
		<p>the council.</p> <p>The council will use its discretion to waive all or part of any charge if is likely to cause undue hardship on a case by case basis.</p>
Health & Wellbeing	<p>In cases where a client is deterred from seeking support from the council due to charges, their health and wellbeing could be detrimentally impacted.</p>	<p>Customers and their families will be provided with advice and information including details of local advice agencies which will provide financial advice where relevant.</p> <p>The council will use its discretion to waive all or part of any charge if is likely to cause undue hardship on a case by case basis.</p>
Other Significant Impacts	<p>No identified impacts.</p>	



Equality and Safety Impact Assessment SHIL2

The **Public Sector Equality Duty** (Section 149 of the Equality Act) requires public bodies to have due regard to the need to eliminate discrimination, advance equality of opportunity, and foster good relations between different people carrying out their activities.

The Equality Duty supports good decision making – it encourages public bodies to be more efficient and effective by understanding how different people will be affected by their activities, so that their policies and services are appropriate and accessible to all and meet different people’s needs. The council’s Equality and Safety Impact Assessment (ESIA) includes an assessment of the community safety impact assessment to comply with Section 17 of the Crime and Disorder Act and will enable the Council to better understand the potential impact of proposals and consider mitigating action.

Name or Brief Description of Proposal	Future of two council owned residential care homes
Brief Service Profile (including number of customers)	
<p>Southampton City Council runs two residential homes, Holcroft House and Glen Lee. Holcroft House is a 34 bedded unit and Glen Lee is a 33 bedded unit. Both are Care Quality Commission (CQC) registered residential units providing short and long term care for adults living with a dementia. Both homes are rated as “good” by CQC. In Glen Lee, the accommodation is provided over two floors accessed by a passenger lift. In Holcroft House, accommodation is provided on one floor.</p> <p>There are currently 36 residential homes that are CQC registered to provide dementia care in or near the boundary of the city. There is an over provision of residential homes in the area, with 70 vacancies available to the council for residential care placements across these homes as of October 2018 (including the two homes run by the council).</p> <p>Although demand for Adult Social Care is increasing, the demand for residential care has decreased as more people are supported to live independently in their own homes. National research has found that older people would prefer to continue living at home for as long as possible. Research also tells us that the demand for residential care is likely to continue to decrease as alternatives such as housing with care become the preferred option.</p> <p>The local care market is better placed to provide care and support where residential care is needed, leaving the council to focus on the development of housing with care and community-based services. The proposal is therefore to close both council owned residential care units: Glen Lee and Holcroft House.</p> <p>The proposal is that, subject to consultation and careful consideration of all representations before any final decision is made, to close one or both of the homes over the period of a year. The proposed closure will be carefully managed and will</p>	

include an individual transition plan for all residents. Care staff will be supported throughout to ensure a safe and excellent quality of care is provided throughout the closure process.

Thorough, person-centred assessments will be undertaken of each individual resident of the homes to determine their needs and how they can best be met in future before any final decisions are taken. These will take into account the views and preferences of the person as well as their families, carers and, where appropriate, their independent advocates. This assessment will also measure the impact of the phased closure on individual residents and will seek support from other professionals and agencies to minimise impact, particularly to their health and well-being.

Residents, relatives, carers and stakeholders have been involved in ongoing discussions, assessment processes and planning for the future. Strict regard has been made to both the framework provided by the law and statutory and good practice guidance. The needs and welfare of residents and families are paramount when considering transfer to alternative provision.

Summary of Impact and Issues

The impact of any decision to close the one or both of the care homes will be a direct impact on those currently using these facilities. Current residents will have their needs reviewed and will be supported to move to alternative provision which could be a new care home.

Financially, no resident will be worse off as a result of this proposal as the council will freeze the rate so that the new care home fee will not be higher than it was prior to the move.

The closure of the current provision has the potential to affect services provided to adults with care and support needs including:

- Adults with dementia
- Adults with physical disabilities
- Adults with sensory support needs
- Short term provision
- Family and Carers
- Local residents

Potential impacts identified so far include:

- Some residents that are currently in the residential homes that are proposed to be closed may find it upsetting to move as they may have been living in the area and care home for a while. If the proposals go ahead, following the consultation period, a full assessment will be carried out for each resident before they move. These assessments will be based on good practice guidelines on closing care homes and settling people into new accommodation. Residents will also have access to independent advocacy support.
- The proposed closures, if approved, will require the council to support some

existing residents to move to a different care home whilst we will work sensitively to minimise the impact their vulnerability may mean they find it a challenging experience. It will mean a change of environment and staff team and it will take time to manage the transition.

- Residents' concerns and levels of anxiety could impact their emotional and physical wellbeing, particularly just before and move, or immediately afterwards. Relatives of residents may also have concerns relating to finding suitable alternate care and support which could impact their health and wellbeing.

Carers and residents will be involved in on-going discussions, assessment processes and planning for the future. It should be noted that, if a decision was taken to close one or both homes, implementation would not take place until 2020 to allow for careful planning and implementation.

If the proposal is approved the council will review in conjunction with the NHS (if appropriate) all resident's needs individually.

Although there is a presumption that all individuals have mental capacity until there is evidence to the contrary it is likely that some of the residents may lack the capacity to make decisions or complex decisions about their residence and their care and support. If after the mental capacity assessment there is evidence that the individual lacks capacity to make relevant decisions the council will need to arrange a best interest decision meeting. In some cases an application to the Court of Protection may be required. The council have a duty to provide independent advocacy services to anyone who would have difficulty in engaging. If the proposal to close one or both of the homes is approved the council will provide advocacy services to residents and relatives where necessary, particularly during any review of the individual's needs for care and support and during care planning to an alternative provider.

Each individuals' rights under relevant legislation, including the Care Act 2014, Mental Capacity Act 2005, Equality Act 2010, and Human Rights Act 1998 would be ensured and best practice and Care Quality Commission Managing Care Home Closures Guidance (2016) will be followed.

Potential Positive Impacts

In the longer term there is evidence that supporting people living with dementia to live independently in their own homes, drawing where appropriate on the support of others in their community, leads to the best outcomes for those people.

Re-providing residential care and support in homes run by charities and the private sector is more cost effective, supporting a more sustainable social care system locally, ensuring that the needs of people in Southampton can continue to be met in full. The proposal for change is in line with the council's strategy to develop more housing with care schemes at different sites as an alternative to residential care. This is a positive impact on people who live in Southampton, as this will enable people to live independently within a scheme in a self-contained flat which will have the benefit of an on-site care team.

Responsible Service Manager	Sharon Stewart, Service Lead: Adult Social Care
Date	8 February 2019
Approved by Senior Manager	Paul Juan, Service Director: Adults, Housing & Communities
Date	8 February 2019

Potential Impact

Impact Assessment	Details of Impact	Possible Solutions & Mitigating Actions
Age	<p>The greatest impact of the proposal is likely to be on those older residents who have been using Glen Lee and Holcroft services for many years and for whom any change in provision will be difficult.</p> <p>All of the residents are over 65 years.</p> <p>There is potential for decline in residents' emotional and physical health during and immediately after any move following closure of a care home.</p>	<p>An initial review of needs has been undertaken for all residents, taking the following factors into consideration:</p> <ul style="list-style-type: none"> • People who lack mental capacity • Very frail vulnerable people, with complex medical needs • People who need specialist equipment • People who have special dietary needs, • People who have sensory loss/deficit e.g. blind, deaf • People who have been resident for long periods and developed close friendship with staff/off residents. <p>Further and more detailed reviews will be undertaken prior to any changes to an individual's accommodation taking place. Through this process information on alternatives will be made available. A gradual approach will be taken to support those who will be most affected.</p>

Impact Assessment	Details of Impact	Possible Solutions & Mitigating Actions
		<p>Individual transition plans will be produced and updated. This plan will include analysing the impact and where necessary other professionals and agencies will be called upon to support the individual to minimise any impact.</p> <p>Advocacy services are in place to help support the individual's and their families throughout the proposed process. Any proposed move will be considered carefully taking into account the persons best interest's and their and their families' wishes and feelings. Any move will need to meet the individuals assessed eligible needs for care and support are met.</p> <p>A project team will be set up, subject to decision, to deliver the decision. There is adequate residential and non-residential provision in or near the boundary of the city to accommodate current residents and any needs associated with their age.</p>
Disability	<p>All residents have a cognitive impairment and a significant number also have a physical impairment.</p> <p>The proposal may have either a positive or negative impact depending on the individual and the extent to which they prefer current models of service.</p>	<p>As above, any proposed move will be considered carefully taking into account the persons best interest's and their and their and families' wishes and feelings. Any move will ensure that the individual's assessed eligible needs for care and support are met,</p>

Impact Assessment	Details of Impact	Possible Solutions & Mitigating Actions
	<p>Those with physical disabilities may experience a larger impact due to some of the alternative options not having the equipment to be able to support appropriately and being able to accommodate in private sector, however, this will be no different to our internal homes.</p> <p>Due to the fact that all impacted individuals have dementia, those individuals affected may need additional support to transition and settle in a new residential setting.</p>	<p>including ensuring they have appropriate equipment.</p> <p>Residents and their carers will be supported to identify the most appropriate residential option which meets their needs.</p>
Gender Reassignment	No identified impact.	
Marriage and Civil Partnership	<p>Some residents within the care homes are married or in partnerships. There currently are no couples living together as residents in the homes.</p> <p>The impacts of the proposals could mean that for some couples, travel arrangements will need to change to their respective visit their respective partner in any new setting.</p>	<p>For future placements, provision across city includes a range of options for accommodating couples.</p> <p>For existing residents, visiting and travel arrangements of their partner will be taken into account when considering alternative care settings.</p>
Pregnancy and Maternity	No identified impact.	
Race	The impact of this proposal is predominantly linked to the health, disability and age needs of the individuals affected. Race is a consideration but not a factor deemed to influence the impact of the proposal.	<p>All residents will have an assessment prior to any service change which will include any cultural considerations linked to race, when looking at appropriate placements within communities.</p> <p>Residents and carers will be able to choose, to some extent, from a range of alternative provision and arrange services that are</p>

Impact Assessment	Details of Impact	Possible Solutions & Mitigating Actions
Religion or Belief	The impact of this proposal is predominantly linked to the health, disability and age needs of the individuals affected. Religion or belief is a consideration but not a factor deemed to influence the impact of the proposal.	culturally appropriate. All residents will have an assessment prior to any service change which will address matters of religion and belief and ensure that future provision is in line with their requirements. Residents and carers will be able to choose, to some extent, from a range of alternative provision and arrange services that are appropriate to their individual need including religion and belief.
Sex	There is likely to be a greater adverse effect on women as a significant majority of residents are currently female. There will be a potential impact on staff as more females are employed at both homes (see other significant impacts).	All residents will have an assessment prior to any service change which will also address matters relating to sex. Residents and carers will be able to choose, to some extent, from a range of alternative provision and arrange services that are tailored to their needs including single gender services. A full statutory consultation will be undertaken in relation to all staff, subject to the decision outcome. The consultation process will include one to one meetings to discuss and address any particular needs or concerns.
Sexual Orientation	No identified impact.	
Community Safety	No identified impact.	
Poverty	Some alternative provision may	There is a varied market

Impact Assessment	Details of Impact	Possible Solutions & Mitigating Actions
	<p>cost more than the existing provision.</p>	<p>provision across Southampton and near to the city, including a range of alternative residential settings available at comparable costs.</p> <p>Placements will be based on assessed level of need rather than affordability, although this will be taken into account.</p>
Health & Wellbeing	<p>Residents' concerns and levels of anxiety could impact their emotional and physical wellbeing particularly just before a move or immediately afterwards.</p> <p>Relatives of residents may also have concerns relating to finding suitable alternate care and support which could impact their health and wellbeing.</p>	<p>Registered managers are monitoring the health and wellbeing of current residents on a daily basis, and any significant changes are being escalated.</p> <p>Residents will be fully assessed prior to any change in service.</p> <p>Throughout this process information on alternatives will be made available.</p>
Other Significant Impacts	<p>The proposals will have a significant impact on staff who are employed at Glen Lee and Holcroft House.</p>	<p>A full statutory consultation will be undertaken in relation to all staff, subject to the decision outcome.</p> <p>The consultation process will include one to one meetings to discuss and address any particular needs or concerns.</p> <p>Full assessment of protected characteristics in relation to staff will be undertaken during this consultation.</p> <p>The outcome of the staff consultation will inform a further Cabinet decision regarding how the</p>

Impact Assessment	Details of Impact	Possible Solutions & Mitigating Actions
		proposals are taken forward to meet the budget requirement. In the event that further budget decisions are required, these will be taken forward in due course.

Equality and Safety Impact Assessment SHIL3

The **Public Sector Equality Duty** (Section 149 of the Equality Act) requires public bodies to have due regard to the need to eliminate discrimination, advance equality of opportunity, and foster good relations between different people carrying out their activities.

The Equality Duty supports good decision making – it encourages public bodies to be more efficient and effective by understanding how different people will be affected by their activities, so that their policies and services are appropriate and accessible to all and meet different people’s needs. The Council’s Equality and Safety Impact Assessment (ESIA) includes an assessment of the community safety impact assessment to comply with Section 17 of the Crime and Disorder Act and will enable the Council to better understand the potential impact of proposals and consider mitigating action.

Name or Brief Description of Proposal	Reclassify some council properties currently only available to those aged 60 and over, making them available to people over 50										
Brief Service Profile (including number of customers)											
<p>There is a significant demand for affordable social rented homes in Southampton and there are currently 8,000 people on the Housing Register.</p> <p>The council has to make best use of the resources available to it in order to be able to house the maximum number of people from the Housing Register. This means there are strict rules about the type of property which applicants can apply for. In deciding on the type of property and degree of priority required, the council has to bear in mind the type of housing available and the demand for that housing.</p> <p>However, there are a number of properties that are currently ‘hard to let’. These are typically properties which are restricted to residents aged 60+, which are on the first floor or above in walk up blocks (without lifts). This proposal is to reclassify some properties which are currently restricted to residents aged 60+ (60+ properties) to make them available to those to aged 50+ or 55+.</p> <p>The table below shows the current breakdown of 60+ properties:</p> <table border="1" style="width: 100%; border-collapse: collapse; margin: 10px 0;"> <tr> <td style="width: 60%;">Ground Floor</td> <td style="text-align: right;">1420</td> </tr> <tr> <td>First Floor</td> <td style="text-align: right;">1446</td> </tr> <tr> <td>Second Floor</td> <td style="text-align: right;">207</td> </tr> <tr> <td>Third Floor</td> <td style="text-align: right;">160</td> </tr> <tr> <td>Total</td> <td style="text-align: right;">3233</td> </tr> </table> <p>There are currently 1,118 over 60+ people on the waiting list for accommodation. However, due to health and/or mobility issues a significant proportion do not bid for properties on the 1st floor and above. Despite direct marketing of properties of 60+ flats to eligible applicants, there has been low demand for some properties, with some remaining unlet for significant periods of time.</p>		Ground Floor	1420	First Floor	1446	Second Floor	207	Third Floor	160	Total	3233
Ground Floor	1420										
First Floor	1446										
Second Floor	207										
Third Floor	160										
Total	3233										

There are costs associated with keeping empty properties both in terms of lost rent and payment of Council Tax, which becomes due on properties which are void for a period longer than one month. In 2017/18, over 680 days were lost on hard to let properties, at a cost of £66,764. This was typically on properties on the first floor and above and this does not include blocks with lifts.

Alongside low demand for some types of properties amongst people 60+, there is a high level of demand from 50+ applicants. In October 2017, there were 1021 applicants waiting for 50+ housing on the housing register. In addition, applicants for 50+ housing wait longer than those waiting for 60+ housing:

Rehoused in last 5 years	Average Waiting Time Years	No of Applications
Over 50s Floating	4	372
Over 60s Floating	1	178
Over 60s Supported Complex	1	115

The blocks currently identified as a potential option for reclassification are:

- | | |
|--|---|
| <ul style="list-style-type: none"> • Malin Close • Rockall Close • Lundy Close • Curzon Court • Sarina Court • Manston Court • Maybush Court • Vellan Court • Penrith Court | <ul style="list-style-type: none"> • Mansel Court • Jessamine Road • Edward Road • Avington Court • Basset Green Court • Bowman Court • Meon Court • Dewsbury Court |
|--|---|

Summary of Impact and Issues

Widening the classification and increasing the numbers of people who can apply will potentially increase the likelihood of finding a suitable and sustainable match for hard to let properties. This should decrease void times and improve waiting times for 50+ applicants in housing need.

Reclassification has been successfully implemented at Orphen Road. The 1st floor flats are now 55+. This has resulted in a decrease in void turnaround times and there have been no complaints from existing residents.

Our proposal is to review and potentially reclassify accommodation in phases, block by block. As part of this, further work would be required to review the sign up process and the proposed age reclassification against each address, either 55+ or 50+. Some properties may be more suitable for reclassification than others, such as properties that have a greater number of first floor flats that are void.

We will undertake detailed consultation with affected tenants on a block by block basis as proposals are developed, and before any decisions are taken about each block. As part of that process we will also review and consider what measures we might need to take to address equality impacts or other impacts for individuals and

properties.

If a tenant applies for the right to buy in one of the flats that have been reclassified then there will be a loss of rental income to the housing revenue account, and there is the potential that the property could be sold on at a later date to someone who is not over 50 years of age. To date, our experience of where reclassification has taken place is that no one has applied for the right to buy. Any sale will mean that the property is a leasehold flat and the occupant will have to pay their share for repairs and for any major work to the block.

Potential Positive Impacts

- Improved void turnaround times.
- Increase in rental income.
- Improved rehousing for those aged 50-60 who are on the housing register.

Responsible Service Manager	Steve Smith, Service Lead: Council Housing & Neighbourhoods.
Date	8 February 2019
Approved by Senior Manager	Paul Juan, Service Director: Adults, Housing & Communities.
Date	8 February 2019

Potential Impact

Impact Assessment	Details of Impact	Possible Solutions & Mitigating Actions
Age	<p>Reclassification would introduce people aged 50-60 in to what is currently designated over 60s accommodation.</p> <p>This would have a positive impact on residents in this age bracket currently on the Housing Register, by making more properties available to them.</p> <p>This would only apply to properties that are currently vacant, and therefore not have an impact on people over 60 on the Housing Register.</p> <p>Some tenants aged 60+ may have concerns about the reclassification of neighbouring properties, as it would mean that the block has a wider mix of tenants including those who are 50+ rather than 60+.</p>	<p>We will undertake detailed consultation with affected tenants on a block by block basis as proposals are developed, and before any decisions are taken about each block.</p> <p>As part of that consultation tenants will receive clear information including clear signage about the rights and responsibilities of tenants. As part of that process we will also review and consider what measures we might need to take to address equality impacts or other impacts for individuals and properties.</p>

Impact Assessment	Details of Impact	Possible Solutions & Mitigating Actions
	as well as potentially younger partners and families.	
Disability	This proposal will seek to reclassify harder to let properties, such as those on 1 st floor or above. People with disabilities, in particular disabilities which affect their mobility, are more likely to require ground floor or specialist properties and would therefore not be impacted by this proposal.	
Gender Reassignment	No identified impact.	
Marriage and Civil Partnership	No identified impact.	
Pregnancy and Maternity	No identified impact.	
Race	No identified impact.	
Religion or Belief	No identified impact.	
Sex	No identified impact.	
Sexual Orientation	No identified impact.	
Community Safety	No identified impact.	
Poverty	No identified impact.	
Health & Wellbeing	Some tenants aged 60+ may have concerns about the reclassification of neighbouring properties, as it would mean that the block has a wider mix of tenants including those who are 50+ rather than 60+, as well as potentially younger partners and families.	<p>Tenants will continue to have access to wellbeing and prevention staff and Local Housing Management staff.</p> <p>We will undertake detailed consultation with affected tenants on a block by block basis as proposals are developed, and before any decisions are taken about each block.</p> <p>As part of that consultation tenants will receive clear information including signage about the rights and responsibilities of tenants.</p>

Impact Assessment	Details of Impact	Possible Solutions & Mitigating Actions
		As part of that process we would also review and consider what measures we might need to take to address equality impacts or other impacts for individuals and properties.
Other Significant Impacts	None identified.	

Equality and Safety Impact Assessment SHIL4

The **Public Sector Equality Duty** (Section 149 of the Equality Act) requires public bodies to have due regard to the need to eliminate discrimination, advance equality of opportunity, and foster good relations between different people carrying out their activities.

The Equality Duty supports good decision making – it encourages public bodies to be more efficient and effective by understanding how different people will be affected by their activities, so that their policies and services are appropriate and accessible to all and meet different people’s needs. The Council’s Equality and Safety Impact Assessment (ESIA) includes an assessment of the community safety impact assessment to comply with Section 17 of the Crime and Disorder Act and will enable the Council to better understand the potential impact of proposals and consider mitigating action.

Name or Brief Description of Proposal	Review service charges to tenants in council owned properties, increasing the existing charges and introducing four new ones.
Brief Service Profile (including number of customers)	
<p>Southampton City Council is a major landlord with around 18,000 council properties. Of these properties, over 16,000 are rented by tenants and the rest are occupied by leaseholders. As a landlord, the council provides a range of services to tenants and leaseholders. These include block cleaning, concierge, heating, grounds and garden maintenance and other services. The council has legal powers to charge for these additional services so long as the charges are clear and transparent and represent the actual cost of the service.</p> <p>Rents are generally taken to include all charges associated with the occupation of a property, such as maintenance and general housing management services. Service charges usually reflect additional services which may not be provided to every tenant, or which may be connected with communal facilities rather than being particular to the occupation of the dwelling.</p> <p>There are different processes for setting the charges for tenants and leaseholders, and this proposal relates to the charges that tenants pay. The proposal is to increase current service charges to tenants, and to introduce four new service charges to tenants as detailed in the table below.</p> <p>The council’s current charges are lower than the actual costs and, in some cases, the council has not previously charged for services, but has been providing a service to tenants. The council needs to have a viable and sustainable Housing Revenue Account (HRA) that enables the council to deliver effective services, invest in its properties to ensure homes are of a modern standard, and to provide new social housing to rent. If the council does not recover its actual costs for these services it has a detrimental effect on the HRA overall.</p> <p>The table below reflects different charges for tenants of walk-up blocks and tower</p>	

blocks. The charges reflect different levels of services and costs. The management and maintenance of tower blocks is significantly higher than walk-up blocks, which is reflected in the higher service charges. The tower blocks include a concierge charge which has been reviewed and increased, and this covers some of the charges listed separately for walk-up blocks such as cleaning. We are proposing that increases to the concierge charge will be phased to mitigate the impact in year 1.

Neighbourhood Wardens were not previously included in walk-up block service charges despite these tenants benefiting from these services. We are proposing phasing the increase for this service for tenants in walk up blocks to mitigate the impact in year 1.

Service (all charges are weekly)	Walk-up block			Tower block		
	Current Charge	Proposed Charge 2019/20	Proposed Charge 2020/21	Current Charge	Proposed Charge 2019/20	Proposed Charge 2020/21
Existing Charge						
Cleaning	65p	72p	72p	-	-	-
Concierge	-	-	-	£1.24	£2.18	£2.73
Neighbour-hood Wardens				£5.12	£5.12	£5.12
TV Aerial (communal)	43p	43p	43p	43p	43p	43p
New Service Charge						
Neighbour-hood Wardens	-	54p	£1.45			
Test/Repair Emergency Lighting	-	27p	27p	-	27p	27p
Garden/ Grounds Maintenance	-	22p	22p	-	22p	22p
Door Entry	-	22p	22p	-	-	-
TOTAL	£1.08	£2.40	£3.31	£6.79	£8.22	£8.77

Summary of Impact and Issues

This proposal will increase the costs to tenants living in the council's walk-up blocks and tower blocks across the city.

Approximately 10,000 tenants (out of a total of approximately 16,000 total) are currently in receipt of Housing Benefit or Universal Credit, and therefore all or some of their rent and services charges are met by benefit payments.

Some service charges are eligible to be paid by Housing Benefit/Universal Credit, so tenants on these benefits are likely to have some or all of the costs included as part of their benefit payments. Those not on either benefit, or where service charges are not considered eligible, will have to pay some or all of the additional charges to the council.

Tenants of walk-up blocks will see a proportionately greater increase in service charges than tenants of tower blocks. However, the total amount remains considerably lower for tenants in walk-up blocks. Neighbourhood Wardens were not previously

included in walk-up block service charges despite these tenants benefiting from these services. We are proposing phasing the increase for this service for tenants in walk up blocks to mitigate the impact in year 1. The management and maintenance of tower blocks is significantly higher than walk-up blocks, which is reflected in the higher service charges.

The charges proposed in the table above are fixed rates that will be payable by all tenants regardless of any protected characteristics. Southampton City Council has not identified any specific impacts related to protected characteristics, either negative or positive, beyond the overall impacts on all tenants of potential increased living costs.

The council intends to set up a discretionary relief fund if these proposals are approved to help those in most need to pay for all or part of the additional charges. The proposal is that the discretionary fund will meet some of or all of the additional changes for up to 6 months for those most in need. This fund will be managed through the Discretionary Housing Payments process that exists already. This fund will assist the people and families in most need, and will enable them to transition to being able to pay for the additional charges, if the charges are not covered by Housing Benefit/Universal Credit or they are not entitled to these benefits.

As this proposal would have a direct impact on existing tenants, a separate and more detailed S.105 consultation will be carried out in addition to the overarching budget consultation to ensure all tenants have an opportunity to engage and provide feedback before a final decision is taken.

Potential Positive Impacts

The council’s current charges are lower than the actual costs of providing the service, and in some cases the council has not previously made a charge but has been providing a service to tenants. The council needs to have a viable and sustainable HRA that enables the council to deliver effective services, invest in its properties to ensure homes are of a modern standard and to provide new social housing to rent. If the council does not recover its actual charges for these services it has a detrimental effect on the HRA overall.

Responsible Service Manager	Steve Smith Service Lead: Council Housing & Neighbourhoods
Date	8 February 2019
Approved by Senior Manager	Paul Juan Service Director: Adults, Housing & Communities
Date	8 February 2019

Potential Impact

Impact Assessment	Details of Impact	Possible Solutions & Mitigating Actions
Age	No identified impacts.	
Disability	No identified impacts.	
Gender Reassignment	No identified impacts.	
Marriage and Civil Partnership	No identified impacts.	
Pregnancy and Maternity	No identified impacts.	
Race	No identified impacts.	
Religion or Belief	No identified impacts.	
Sex	No identified impacts.	
Sexual Orientation	No identified impacts.	
Community Safety	No identified impacts.	
Poverty	<p>Council tenants are more likely to be on lower incomes and eligible for qualifying benefits than other groups.</p> <p>Approximately 10,000 tenants are currently in receipt of Housing Benefit/Universal Credit.</p> <p>Those on lower incomes are more likely to experience a proportionally higher impacts of a service charge increase than others.</p>	<p>Tenants will be given information as to how to gain advice from local agencies such as the council's Homeless Prevention Team, Citizen Advice, Money Advice Service, StepChange, Money Matters, Age UK, and local relevant charitable/voluntary sector organisations.</p> <p>Some service charges may be covered by Housing Benefit/Universal Credit.</p> <p>The council intends to set up a discretionary relief fund if these proposals are approved to help those in most need to pay for all or part of the additional charges.</p>

Impact Assessment	Details of Impact	Possible Solutions & Mitigating Actions
Health & Wellbeing	Tenants may experience increased financial strain due to increased living costs, which may have negative impacts on health and wellbeing.	<p>Tenants will be given information as to how to gain advice from local agencies such as the council's Homeless Prevention Team, Citizen Advice, Money Advice Service, StepChange, Money Matters, Age UK, and local relevant charitable/voluntary sector organisations.</p> <p>The council intends to set up a discretionary relief fund if these proposals are approved to help those in most need to pay for all or part of the additional charges.</p>
Other Significant Impacts	None identified.	

Equality and Safety Impact Assessment SSEG1

The **Public Sector Equality Duty** (Section 149 of the Equality Act) requires public bodies to have due regard to the need to eliminate discrimination, advance equality of opportunity, and foster good relations between different people carrying out their activities.

The Equality Duty supports good decision making – it encourages public bodies to be more efficient and effective by understanding how different people will be affected by their activities, so that their policies and services are appropriate and accessible to all and meet different people’s needs. The Council’s Equality and Safety Impact Assessment (ESIA) includes an assessment of the community safety impact assessment to comply with Section 17 of the Crime and Disorder Act and will enable the Council to better understand the potential impact of proposals and consider mitigating action.

Name or Brief Description of Proposal	Introduce charging for Blue Badge holders for parking in council owned off-street car parks
Brief Service Profile (including number of customers)	
<p>Southampton City Council manages over 5,000 off street public parking spaces and 1,500 on street parking spaces across the city. The income generated from this is used to invest in infrastructure and other initiatives within Southampton.</p> <p>The Disabled Person’s Parking Badge Scheme, also known as the Blue Badge Scheme, provides a national arrangement of parking concessions for people with severe mobility difficulties, who travel either as drivers or passengers. A Blue Badge is designed to help disabled people park close to their destination, either as a passenger or driver. There are 7,781 Blue Badge holders in the city and over 50% of those are people with walking difficulties.</p> <p>Blue Badges are specifically intended for on-street parking. The Blue Badge allows holders to park for free:</p> <ul style="list-style-type: none"> • on street pay and display bays, limited waiting bays and permit parking bays for as long as required. • in disabled parking bays on streets for as long as required (unless additional time restrictions are in place). • on single or double yellow lines for up to 3 hours (unless there is a ‘no loading’ or no stopping sign). <p>Southampton City Council currently allows Blue Badge holders to park in some off-street car parks for free, and for as long as required, in addition to the provisions for on-street parking through the Blue Badge Scheme.</p>	
Summary of Impact and Issues	
<p>The proposal is to withdraw free parking in off-street car parks for Blue Badge holders, meaning that Blue Badge holders who choose to park in off-street car parks will be subject to a charge and the same terms and conditions as other users. Other local authorities already charge Blue Badge holders for parking in off-street car</p>	

parks.

The introduction of charges for Blue Badge holders apply to all council owned surface car parks and to the West Park Road Multi-story Car Park (MSCP). All other MSCPs in the city already have barrier systems in place, meaning that those with Blue Badges pay for parking in these car parks.

Blue Badge holders will still have designated spaces within off-street car parks, however, they will be expected to pay parking charges in common with all users of that car park and be subject to any time restrictions in place in that car park. Blue Badge holders will continue have the option to make use of on-street parking for free, and these changes will apply to off-street car parks only.

The council have mapped out the available on street disabled bays close to essential services and are satisfied that adequate provision has been made through dedicated bays for current demand. There are also a number of locations, either on the highway, or through free use of the normal street parking bays to assist when demand for spaces is particularly high. These facilities are generally located closer to essential services than the off street car parks covered by these proposals.

Off street car parks are provided over and above the assessed need to provide further choice for members of the public, including disabled drivers, who may prefer that type of car parking facility. It is not unreasonable to charge for such additional, wholly discretionary services provided to increase choice rather than meet assessed need. Southampton City Council will continue to monitor demand and will consider further mitigations if a need for additional concessions can be demonstrated.

The withdrawal of free, unlimited parking in off-street car parks for Blue Badge holders will allow the council to better manage turnover in high demand car parks.

Potential Positive Impacts

The introduction of charging for Blue Badge holders in surface car parks will reconcile car parking charges for all users of surface car parks and increase the turnover of car parking spaces in high demand car parks, generating capacity for further investment in car parking infrastructure. Whilst still meeting the assessed need for free on street disabled parking close to essential services.

Responsible Service Manager	Rosie Zambra, Service Lead: Environment Street Scene & Health.
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Date	8 February 2019
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Approved by Senior Manager	Mitch Sanders, Service Director: Transactions & Universal Services.
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Date	8 February 2019
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Potential Impact

Impact Assessment	Details of Impact	Possible Solutions & Mitigating Actions
<p>Age</p>	<p>This proposal will have an impact on Blue Badge holders aged over 17 years who drive and all ages who are passengers in cars. Higher numbers of older people are likely to be Blue Badge holders.</p> <p>The impact will require Blue Badge holders to pay for parking which was previously free if they choose to park in off-street car park, and mean that they are subject to any terms and conditions of the car park such as time restrictions.</p>	<p>Charges only apply to off-street car parks. There is a statutory requirement to provide free on street car parking, which is located having regard to proximity to essential services. Signing in car parks and communications will draw attention to this change.</p> <p>The council have undertaken an assessment which demonstrates that there is sufficient alternative on street parking and/or dedicated on street disabled bays that is either within the immediate vicinity of the car park or would likely facilitate parking for essential services closer than the off-street provision affected.</p> <p>Provision of on street disabled parking bays is reviewed regularly and every effort is made to replace those that are lost due to changes to the highway or other reasons.</p>
<p>Disability</p>	<p>All Blue Badge holders are people who have a disability or health condition that affects their mobility.</p> <p>The proposal to introduce charges in off-street car parks will have a financial impact on this group if an individual chooses to park in an off-street car park.</p> <p>Blue Badge holders will be subject to the terms and conditions of the car park, which may include time</p>	<p>Charges only apply to off-street car parks. There is a statutory requirement to provide free on street car parking which is provided in proximity to essential services. Signing in car parks and communications will draw attention to this change.</p> <p>The council have undertaken an assessment</p>

Impact Assessment	Details of Impact	Possible Solutions & Mitigating Actions
	restrictions, including a two hour parking limit in car parks including the Civic Centre Forecourt and Albion Place (Castle Way). People with a disability that affects their mobility may be more affected by time limitations than those who do not have a disability.	which demonstrates that there is sufficient alternative on street parking and/or dedicated on street disabled bays that is either within the immediate vicinity of the car park or would likely facilitate parking for essential services closer than the off-street provision affected.
Gender Reassignment	No identified impact.	
Marriage and Civil Partnership	No identified impact.	
Pregnancy and Maternity	No identified impact.	
Race	No identified impact.	
Religion or Belief	No identified impact.	
Sex	No identified impact.	
Sexual Orientation	No identified impact.	
Community Safety	Blue Badge Holders using on street parking, such as double yellow lines, as a result of off-street parking no longer being free, could increase the risk of an accident occurring for either themselves when exiting their vehicle or other motorists/ pedestrians passing by.	The council will encourage the use of on-street parking in designated on-street disabled bays where possible. It is recommended that drivers take reasonable precautions when exiting the vehicle as would be normal when parking in an on-street location. The Blue Badge Handbook recommends that drivers only park on double yellow lines where it is safe to do so.
Poverty	Blue Badge holders using on street parking, such as double yellow lines, as a result of off street parking no longer being free, may experience difficulties when exiting their vehicle and/or cause problems for other motorists/ pedestrians passing by.	Free on-street car parking is available for anyone who is a Blue Badge holder. The council have undertaken an assessment which demonstrates that there is sufficient alternative

Impact Assessment	Details of Impact	Possible Solutions & Mitigating Actions
		on street parking and/or dedicated on street disabled bays that is either within the immediate vicinity of the car park or closer to essential services.
Health & Wellbeing	No identified impact.	
Other Significant Impacts	No identified impact.	

Equality and Safety Impact Assessment SSEG2

The **Public Sector Equality Duty** (Section 149 of the Equality Act) requires public bodies to have due regard to the need to eliminate discrimination, advance equality of opportunity, and foster good relations between different people carrying out their activities.

The Equality Duty supports good decision making – it encourages public bodies to be more efficient and effective by understanding how different people will be affected by their activities, so that their policies and services are appropriate and accessible to all and meet different people’s needs. The Council’s Equality and Safety Impact Assessment (ESIA) includes an assessment of the community safety impact assessment to comply with Section 17 of the Crime and Disorder Act and will enable the Council to better understand the potential impact of proposals and consider mitigating action.

Name or Brief Description of Proposal	Increase Itchen Bridge fees for non-residents				
Brief Service Profile (including number of customers)					
<p>The Itchen Bridge first opened in 1977 to reduce the congestion from traffic leaving and entering the city. The bridge is operated and maintained by Southampton City Council and uses a variable toll, which is based on the height of the vehicle at the front axle.</p> <p>The Itchen Bridge serves as a major link between the east and west of the city, with a flow of around 20,000 vehicles per day. Crossing the bridge has always been subject to a toll payment, as introduced by the Hampshire Act upon opening of the bridge.</p> <p>Some regular users of the bridge make payments by using a SmartCities card, whilst other users currently pay by cash, including people passing through the city on business or for leisure, and non-regular users. Concessions are available to local residents and local commercial businesses when paying using a Smartcities card.</p> <p>Residents with a Blue Badge and who receive SmartCities eligible mobility related benefit payments are entitled to free travel across the Itchen Toll Bridge with a SmartCities card. Owners of fully electric vehicles can cross the Itchen Bridge free of charge with a SmartCities card by applying for an Electric Vehicle concession.</p> <p>The toll charges were last amended in 2013, with the change of prices and the introduction of split charges between peak and off peak for some vehicle classes.</p> <p>Below is a table which shows the current charge for crossing the Itchen Bridge:</p>					
	Non-Smart Card users	Non-resident (Smart)	Local Resident (Smart)	Local Commercial (Smart)	Disabled person / Electric

		Card)	Card)	Card)	Vehicle (Smart Card)
Class 1 – motorcycles and three-wheeled vehicles	Free	Free	Free	Free	Free
Class 2 – cars, small vans and small 4x4s OFF PEAK	50p	50p	30p	30p	Free
Class 2 – cars, small vans and small 4x4s PEAK	60p	60p	40p	40p	Free
Class 3 large vans (e.g. transit) and large 4x4s	£1.20	N/A	60p	60p	N/A
Class 4 HGVs	£25	£25	N/A	£2	N/A

Summary of Impact and Issues

The proposal is to increase the Itchen Bridge Toll charges by 20p to vehicles in classes 2 and 3 and above crossing the bridge, who are not eligible for a concession. This will impact on non-residents, whether using a SmartCities card or paying in cash, who are driving cars, small vans, small 4x4 and large vans, which include large transit and 4x4 vans.

The increase in the toll would not apply to residents that receive a concessionary toll through use of a SmartCities. Residents who do not currently have a SmartCities card would need to apply for one in order to avoid paying the increased charges.

Those that currently qualify for free use of the bridge would continue to do so, which includes motorcycles, electric vehicles and blue badge holders who receive SmartCities eligible mobility related benefit payments.

The following pricing structure demonstrates the proposed charges for 2019 and beyond:

Class	18/19		19/20	
	Peak	Off-peak	Peak	Off-peak
Class 1 – motorcycles and three-wheeled vehicles	Free	Free	Free	Free
Class 2 – cars, small vans and small 4x4s	60p	50p	80p	70p
Class 3 – large vans (e.g. transit) and large 4x4s	£1.20	£1.20	£1.40	£1.40
Class 4 – HGVs	£25	£25	£25	£25

This increased charge will support the running costs of the bridge, including maintenance and management.

There could be a potential negative impact on air quality on the A3024 if regular users of the bridge were to divert as a result of the increase in toll. However residents of the city with a smart city card will not pay the increased toll. In addition an analysis of motoring costs also indicates that even with a small increase in the toll there would be no financial reason to divert along the A3024 due to the additional mileage and associated fuel costs, not to mention the additional journey time. There is not likely therefore to be any significant or lasting diversion of traffic onto the A3024 or adverse impact on air quality.

Potential Positive Impacts

Increasing toll charges may encourage more people to seek alternative methods of transport (public transport, car shares, cycling etc.), or car sharing leading to air quality and health improvements.

Responsible Service Manager	Rosie Zambra, Service Lead: Environment Street Scene & Health.
Date	8 February 2019
Approved by Senior Manager	Mitch Sanders, Service Director: Transactions & Universal Services.
Date	8 February 2019

Potential Impact

Impact Assessment	Details of Impact	Possible Solutions & Mitigating Actions
Age	The increased charges will impact on drivers of all ages who are non-residents visiting the city for education, business or leisure and fall into the class 2 or 3 bracket, as well as residents who do not use a SmartCities.	Residents of the city can apply for a concession via a SmartCities card and would therefore not have to pay for the increased amount. Alternative routes are available for non-residents and these routes are more suitable for non-local traffic.

Impact Assessment	Details of Impact	Possible Solutions & Mitigating Actions
Disability	No identified impact.	
Gender Reassignment	No identified impact.	
Marriage and Civil Partnership	No identified impact.	
Pregnancy and Maternity	No identified impact.	
Race	No identified impact.	
Religion or Belief	No identified impact.	
Sex	No identified impact.	
Sexual Orientation	No identified impact.	
Community Safety	No identified impact.	
Poverty	This proposal may have a negative impact on some users who are non-residents or non-smart card users, who are low income earners and need to travel to Southampton to work.	The price increase is to meet the running costs of the bridge, including maintenance and management. This charge would not apply to residents that receive a concessionary toll and this discount would be protected.
Health & Wellbeing	No identified impact.	
Other Significant Impacts	None identified.	