

Cabinet

DOCUMENTS FOR THE MEMBERS ROOM

Tuesday, 15th August, 2017
at 4.30 pm

MEMBERS ROOM DOCUMENTS ATTACHED TO THE
LISTED REPORTS

Contacts

Cabinet Administrator

Pat Wood

Tel: 023 8083 2302

Email: pat.wood@southampton.gov.uk

MEMBERS ROOM DOCUMENTS

10 LOCAL AUTHORITY TRADING COMPANY FOR SOME COUNCIL SERVICES
(Pages 1 - 10)

- Equality and Safety Impact Assessment

11 ESTABLISHMENT OF AN IN HOUSE EDGE OF CARE SERVICE ((Pages 11 - 32)

- Equality and Safety Impact Assessment
- Privacy Impact Assessment

12 SUFFICIENCY OF EARLY YEARS PLACES IN MILLBROOK ((Pages 33 - 36)

- Equality and Safety Impact Assessment

Monday, 7 August 2017

SERVICE DIRECTOR, LEGAL AND GOVERNANCE



Equality and Safety Impact Assessment

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 the budget proposals and consider mitigating action.

<p>Name or Brief Description of Proposal</p>	<p>The proposal is seeking to create a Local Authority Trading Company (LATCo) for the management, delivery and commercialisation of the following Council services:</p> <ul style="list-style-type: none"> • Housing operations and housing management • Waste management and collection • Car park operations • Parks and open spaces • Pest Control • Street cleansing • Facilities management • Transport
<p>Brief Service Profile (including number of customers)</p>	<p>The services in scope are delivered across two service areas of the Council and affect around 560 FTEs.</p> <p>Housing Operations & Management sits within the Adults, Housing and Communities service area and is responsible for the day to day maintenance and management of the Council’s 16,500 homes. This involves helping people to manage their tenancies as well as delivering 52,000 internal and external housing repairs each year.</p>

Housing Management and Operations Functions Under Consideration	
Housing Allocations applications	x
Applications for transfers	x
Homelessness	x
Enforcement of tenancy conditions & civil litigation	x
Tenancy advice services	x
Dealing with overcrowding	x
Management of supported accommodation & liaison with Scheme Managers	x
Tenant Involvement	x
Dealing with applications for access to personal files & information	x
Dealing with Members & Ombudsman enquiries & freedom of information requests	X
Complaint resolution	x
Reception services	x
Home loss payments	x
Insurance	x
Liaison with housing benefit and council tax	x
Domestic violence and relationship breakdown	x
Concierge services	x
Estate inspections	x
Safety management	x
Customer Call Centre	x
Right to Buy Leaseholder Consultation	x
Asset Register	x

The remaining services currently under consideration sit within Transactional & Universal Services and include the following:

- Car Park Operation Services, which operate an in-house one stop shop approach to the management and maintenance of the city's car parks over a 7 day period from a workshop located in Paget Street Industrial Units. It is linked by dedicated fibre to all Multi Storey Car Parks to maintain the Pay on Foot System and to New City Depot for Control

Room operators who monitor the help points and Pay on Foot System 24/7.

Car Park Operation Functions Under Consideration	
Development of existing car park sites	X
Opening and closing of car parks (as directed by SCC)	X
Cash collection, counting and banking	X
Supply of parking tickets and other materials	X
Provide and maintain any equipment / solutions required to manage car parks	X
Provide help-desk type service to customers	X
Provide an administration service	X

- Facilities Management Services are delivered for Civic Buildings, the City Depot & Recycling Park and new Granville Street depot. In addition support services are also delivered with the management of CCTV, cleaning contract, parking, security and reception services. Fleet Management is the central purchaser of vehicles and machinery to the Council. The department maintains, repairs and services c1000 vehicles and plant each year. The workshop includes 3 HGV inspection pits, 6 bays for smaller vehicles and plant, MOT test bay for Class 4, 5a and 7 vehicles, stores and fuel. The department is also responsible for vehicle management information, driver licence checks, damage recovery, repairs, vehicle hire and insurance claims as well as driver training and assessments.

Facilities Management Functions (Anything which is approved by Capital Board is out of scope)	
Buildings (any workplace owned by SCC)	x
Cleaning	x
Reception Services	x
Security Services	x

Repair and replacement of all defective or non-serviceable parts	x
Maintenance of all external and internal areas, all structures, fabric, finishes and fixtures and fittings	x
Maintenance of Mechanical and Electrical Services and Systems	x
Portable Appliance Testing	x
Maintenance of portable firefighting equipment	x
Reporting requirements for health and safety, including a suitable reporting form for use on reporting Site related incidents and security systems	x

- The Parks and Grounds Maintenance Team delivers a number of services in support of sustaining and developing Southampton as a 'green city'. This includes management and stewardship of parks resources and assets (e.g. grass, shrub & hedge maintenance; litter removal and disposal; seasonal bedding & floristry; sports pitch maintenance etc.), allotment provision & maintenance; SLA's for Housing and Schools grounds maintenance; Tree management, risk assessment, maintenance and planning advice; Landscape design & construction; Play area design, installation, inspection & maintenance and Stewardship of SSSI's, SINCS, and areas of importance for wildlife amongst other things.

Parks and Open Spaces Functions Under Consideration	
Management and stewardship of the city's parks and green spaces, and associated resources and assets	x
Grounds maintenance	x
Landscaping	x
Maintenance of sports centre sports pitches, athletics facilities, and synthetic football, hockey, netball and tennis courts.	x
Provision and maintenance of public pay and play facilities i.e. mini golf, pitch and putt, tennis	x
Play Area installations, inspections and maintenance	x
Maintenance of urban games provision e.g. skate parks, baseball courts, and MUGA's	x

Arboriculture Services	x
Allotments	x

- Pest Control

Pest Control Functions	
Eradication of rodent and insect pests	x
Collection of clinical waste	x
Cleansing of filthy or verminous premises	x

- The Transport Services under consideration are:

Transport Functions Under Considerations LATCo	
Adult social care transport, e.g. to/from day care or other care	x
Children's services transport, e.g. home to school transport	x
Public transport services	x
Fleet services	x
Staff transport	x
Courier services	x
Policy for the above services	

- The Street Cleansing Service is organised into three District Teams (East, West and Central) and a specialist City Centre Team. The resourcing of the maintenance of the various land designations set out in the EPA supports a frequency of operation that ensures general compliance with the requirements of the Act (e.g. daily cleaning of zone 1 retail areas). Where an area is reported to fall below acceptable standards between routine visits, this will instantly generate a specific job task to be undertaken by the service's rapid response unit.

Street Cleansing Functions	
Cleaning of city centre and district centres	x
'Zonal' cleaning of residential areas	x
Routine cleaning of city's major gateways and arteries	x

	Graffiti, fly posting and fly tipping removal and control	x											
	Rapid response to urgent cleansing customer reports (dog fouling, sharps, hate-crime graffiti, fly tipping, localised litter build-ups)	x											
	Autumn leaf clearing from city's streets	x											
	Weed control on highways, footpaths and hard standing	x											
	Educational and enforcement promotions and campaigns to improve cleanliness of city	x											
	Care and management of city's inventory of street litter bins, including replacement of damaged items and installation of new bins	x											
	<ul style="list-style-type: none"> Waste Management Services provide weekly collection of household waste; fortnightly collection of recycling and glass; chargeable fortnightly collection of garden waste; chargeable bulky waste collection service and bulky block and voids service for Housing. Commercial Waste Service includes schools; advice and information for bin storage and containers for new developments (chargeable service); education and enforcement initiatives; management of the waste disposal contract; a household waste recycling centre; glass banks across the city and the management of textile banks across the city which generate income. 												
	<table border="1"> <thead> <tr> <th colspan="2">Waste Management Functions Under Consideration</th> </tr> </thead> <tbody> <tr> <td>Collect domestic and trade waste and recycling from homes and businesses</td> <td>x</td> </tr> <tr> <td>Deliver waste to transfer stations, incinerator and landfill</td> <td>x</td> </tr> <tr> <td>Disposal of commercial waste</td> <td>x</td> </tr> <tr> <td>Provide advice about waste disposal and collection options</td> <td>x</td> </tr> <tr> <td>Manage container delivery and replacement</td> <td>x</td> </tr> </tbody> </table>	Waste Management Functions Under Consideration		Collect domestic and trade waste and recycling from homes and businesses	x	Deliver waste to transfer stations, incinerator and landfill	x	Disposal of commercial waste	x	Provide advice about waste disposal and collection options	x	Manage container delivery and replacement	x
Waste Management Functions Under Consideration													
Collect domestic and trade waste and recycling from homes and businesses	x												
Deliver waste to transfer stations, incinerator and landfill	x												
Disposal of commercial waste	x												
Provide advice about waste disposal and collection options	x												
Manage container delivery and replacement	x												
Summary of	Customers: There is a risk that some service may experience a dip in												

Impact and Issues

performance during transfer of services into the LATCo.

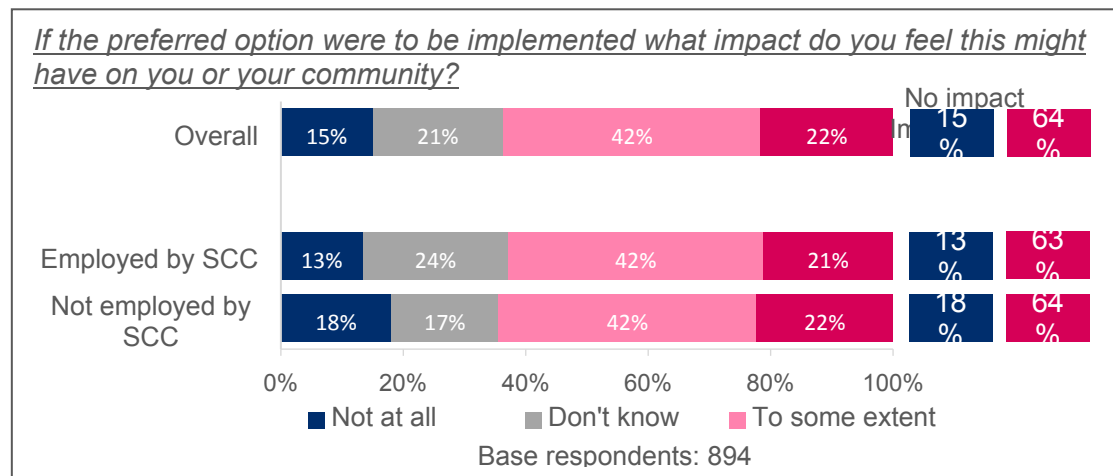
Staff: Further work is required to determine the impact on staff in relation to secondment and / or TUPE arrangements and wider governance issues around the ownership and control functions of the Council.

Feedback received: The initial consultation on the establishment of a Local Authority Trading Company took place between 15 June 2017 and 13 July 2017. In total, 923 responses were received on the proposals from a range of staff and members of the public.

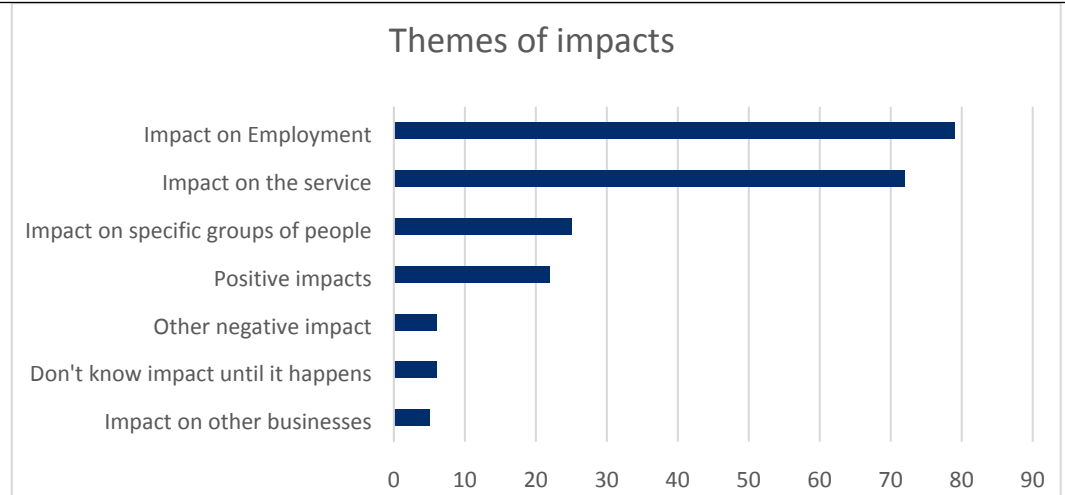
The response to the consultation showed a high level of agreement with the need for services to change to deal with the challenges we face (78%).

Overall 63% of all respondents agreed with the preferred option to create a Local Authority Trading Company. There was 58% overall agreement with the proposed services in scope.

In total, 894 respondents (97%) answered the consultation question about the impacts the proposals would have if implemented. The majority felt there would be an impact on them or their community, with 64% of all respondents suggesting they would feel some impact (full break down in the figure below).



Respondents were also given the opportunity to suggest any impacts they or others might face if the proposals were implemented. In total 156 respondents answered this question, the main themes of the impact comments are shown in the graph below.



The most frequently identified impact related to employment, these made up 51% of the impact comments. The second most frequently identified impact related to the potential impact on the service, these made up 46% of the impact comments. The third most frequently identified impact related to the potential impact on specific groups of people, these made up 16% of the impact comments. Some of the specific groups mentioned in these comments were, vulnerable people, people with disabilities, lower income households, socially isolated people, older people, BAME, Tenants and children and young people. Many of these groups have been identified as impacted with little information as to how.

All identified impacts have been noted and as proposals are developed and further consultation is undertaken plans can be put in place to mitigate against any negative impacts establishing a Local Authority Trading Company may have.

Potential Positive Impacts

Customers: The LATCo will build on existing service quality and improve the service experience to customers (citizens, businesses and visitors) through the development and improvement of service offerings;

Staff: The LATCo presents opportunities for employee engagement and empowerment through the potential beneficial trust involvement in the ownership of any company and / or performance related benefit opportunities.

	It also has the ability to provide management with greater flexibility to shape service provision.
Responsible Service Manager	Richard Crouch
Date	31/07/17

<u>Approved by Senior Manager</u>	Richard Crouch
Signature	
Date	31/07/17

Potential Impact

Impact Assessment	Details of Impact	Possible Solutions & Mitigating Actions
Age	No specific impact at this stage	
Disability	No specific impact at this stage	
Gender Reassignment	No specific impact at this stage	
Marriage and Civil Partnership	No specific impact at this stage	
Pregnancy and Maternity	No specific impact at this stage	
Race	No specific impact at this stage	
Religion or Belief	None	
Sex	No specific impact at this stage	
Sexual Orientation	No specific impact at this stage	
Community	No specific impact at this stage	



SOUTHAMPTON
CITY COUNCIL

Safety		
Poverty	No specific impact at this stage	
Other Significant Impacts	None	

Equality and Safety Impact Assessment



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 the budget proposals and consider mitigating action.

Name or Brief Description of Proposal	Establishment of an in house Edge of Care Service
Brief Service Profile (including number of customers)	<p>An in-house Edge of Care service working with families where the threshold has been met for becoming looked after by the local Authority, but with intensive therapeutic intervention within a time limited period, the child is able to safely remain and be sustained at home through affecting evidenced and positive change.</p> <p>The service will work with a total of 360 children over a 5 year operational period. (approx. 72 a year).</p>
Summary of Impact and Issues	It is estimated that of the total cohort of children worked with there will be a 50% success rate, but where it is not possible for children to remain at home, then evidence provided by this service and intervention will accelerate permanency and stability via the courts and alternative arrangements.
Potential Positive Impacts	<ul style="list-style-type: none"> • Where possible children remain safely at home with their birth parent(s) who have demonstrated an ability to change and parent more effectively. • Children are prevented from entering the care system unnecessarily potentially worsening outcomes. • More timely decisions for children who require alternative permanent care
Responsible Service Manager	Donna Chapman

Date	26.7.17
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Approved by Senior Manager	Hilary Brooks
Date	

Potential Impact

Impact Assessment	Details of Impact	Possible Solutions & Mitigating Actions
Age	No adverse Impact – the service is available to children of all ages (0-18) and family backgrounds	N/A
Disability	As above	N/A
Gender Reassignment	As above	N/A
Marriage and Civil Partnership	As above	N/A
Pregnancy and Maternity	As above	N/A
Race	As above	N/A
Religion or Belief	As above	N/A
Sex	As above	N/A
Sexual Orientation	As above	N/A
Community Safety	As above	N/A
Poverty	As above	N/A
Other Significant Impacts	As above	N/A



What is a Privacy Impact Assessment?

A Privacy Impact Assessment (“PIA”) is a process that assists organisations in identifying and minimising the privacy risks of new projects or policies.

Projects of all sizes could impact on personal data.

The PIA will help to ensure that potential problems are identified at an early stage, when addressing them will often be simpler and less costly.

Conducting a PIA should benefit the Council by producing better policies and systems, and improving the relationship with individuals.

Why should I carry out a PIA?

Carrying out an effective PIA should benefit the people affected by a project and also the organisation carrying out the project.

Whilst not a legal requirement, it is often the most effective way to demonstrate to the Information Commissioner’s Officer how personal data processing complies with the [Data Protection Act 1998](#).

A project which has been subject to a PIA should be less privacy intrusive and therefore less likely to affect individuals in a negative way.

A PIA should improve transparency and make it easier for individuals to understand how and why their information is being used.

When should I carry out a PIA?

The core principles of PIA can be applied to any project that involves the use of personal data, or to any other activity that could have an impact on the privacy of individuals.

Answering the screening questions in **Section 1** of this document should help you identify the need for a PIA at an early stage of your project, which can then be built into your project management or other business process.

Who should carry out a PIA?

Responsibility for conducting a PIA should be placed at senior manager level. A PIA has strategic significance and direct responsibility for the PIA must, therefore, be assumed by a senior manager.

The senior manager should ensure effective management of the privacy impacts arising from the project, and avoid expensive re-work and retro-fitting of features by discovering issues early.

A senior manager can delegate responsibilities for conducting a PIA to three alternatives:

- a) An appointment within the overall project team;
- b) Someone who is outside the project; or
- c) An external consultant.

Each of these alternatives has its own advantages and disadvantages, and careful consideration should be given on each project as to who would be best-placed for carrying out the PIA.

How do I carry out a PIA?

Working through each section of this document will guide you through the PIA process.

The requirement for a PIA will be identified by answering the questions in **Section 1**. If a requirement has been identified, you should complete all the remaining sections in order.

The Privacy Impact Assessment Statement in **Section 7** should be completed in all cases, and a copy of this document should be sent to the Senior Legal Assistant (Information) to record and review.

The Senior Legal Assistant (Information) will then issue a report, confirming whether the proposed measures to address the privacy risks identified are adequate, and make recommendations for additional measures needed.

These measures will be reviewed once in place to ensure that they are effective.

Advice can be found at the beginning of each section, but if further information or assistance is required, please contact the Senior Legal Assistant (Information) on 023 8083 2676 or at foi.requests@southampton.gov.uk.

Section 1 - Screening Statements

The following statements will help you decide whether a PIA is necessary for your project.

Please tick all that apply.

The project will involve the collection of new information about individuals.

The project will compel individuals to provide information about themselves.

Information about individuals will be disclosed to organisations or people who have not previously had routine access to the information.

You are using information about individuals for a purpose it is not currently used for, or in a way it is not currently used.

The project involves you using new technology which might be perceived as being privacy intrusive. For example, the use of biometrics or facial recognition.

The project will result in you making decisions or taking action against individuals in ways which can have a significant impact on them.

The information about individuals is of a kind particularly likely to raise privacy concerns or expectations. For example, health records, criminal records, or other information that people would consider to be particularly private.

The project will require you to contact individuals in ways which they may find intrusive.

The project involves making changes to the way personal information is obtained, recorded, transmitted, deleted, or held.

If any of these statements apply to your project, it is an indication that a PIA would be a useful exercise, and you should complete the rest of the assessment, including the Privacy Impact Assessment Statement in **Section 7**.

If none of these statements apply, it is not necessary to carry out a PIA for your project, but you will still need to complete the Privacy Impact Assessment Statement in **Section 7**.

Section 2 - Identifying the Need for a PIA

With the screening statements in mind, briefly explain what the project aims to achieve, what the benefits will be to the organisation, to individuals, and to other parties.

You may find it helpful to link to other relevant documents related to the project, for example a project proposal.

Section 3 - Describe the Information Flows

The collection, use, and deletion of personal data should be described here, and it may also be useful to refer to a flow diagram or another way of explaining data flows.

You should also say how many individuals are likely to be affected by the project.

Section 4 - Identify the Privacy Risks

Answering the questions below will help you identify the key privacy risks, and the associated compliance and corporate risks.

The questions cover the 8 Principles of the [Data Protection Act 1998](#), and whilst all may not be relevant to your project, they may prompt you to consider areas of risk which aren't initially apparent.

Principle 1

Personal data shall be processed fairly and lawfully and, in particular, shall not be processed unless:

- a) at least one of the conditions in Schedule 2 is met, and**
 - b) in the case of sensitive personal data, at least one of the conditions in Schedule 3 is also met.**
-

Have you identified the purpose of the project?

What information will be collected and/or shared?

With whom will the information be shared?

How will individuals be told about the use of their personal data?

Who should be consulted about the processing of personal information, internally and externally?

How will you carry out the consultation?

Conditions for processing

For all data (tick all that apply):

The individual who the personal data is about has consented to the processing.

The processing is necessary in relation to a contract which the individual has entered into, or because the individual has asked for something to be done so they can enter into a contract.

The processing is necessary because of a legal obligation that applies to you (except an obligation imposed by a contract).

The processing is necessary to protect the individual's "vital interests".

The processing is necessary for administering justice, or for exercising statutory, governmental, or other public functions.

The processing is necessary for the purposes of the Council's legitimate interests.

If your project involves the processing of [sensitive data](#)* (tick all that apply):

The data subject has given his explicit consent to the processing of the personal data.

The individual who the sensitive personal data is about has given explicit consent to the processing.

The processing is necessary so that you can comply with employment law.

The processing is necessary to protect the vital interests of the individual (in a case where the individual's consent cannot be given or reasonably obtained), or another person (in a case where the individual's consent has been unreasonably withheld).

The processing is carried out by a not-for-profit organisation and does not involve disclosing personal data to a third party, unless the individual consents. Extra limitations apply to this condition.

The individual has deliberately made the information public.

The processing is necessary in relation to legal proceedings (for obtaining legal advice, or otherwise for establishing, exercising or defending legal rights).

The processing is necessary for administering justice, or for exercising statutory or governmental functions.

The processing is necessary for medical purposes, and is undertaken by a health professional or by someone who is subject to an equivalent duty of confidentiality.

The processing is necessary for monitoring equality of opportunity, and is carried out with appropriate safeguards for the rights of individuals.

* Under the Data Protection Act 1998, sensitive personal data is defined as personal data consisting of information as to:

- (a) the racial or ethnic origin of the data subject,
- (b) his political opinions,
- (c) his religious beliefs or other beliefs of a similar nature,
- (d) whether he is a member of a trade union,
- (e) his physical or mental health or condition,
- (f) his sexual life,
- (g) the commission or alleged commission by him of any offence, or
- (h) any proceedings for any offence committed or alleged to have been committed by him, the disposal of such proceedings or the sentence of any court in such proceedings.

If you are relying on consent to process personal data, how will this be collected and what will you do if it is withheld or withdrawn?

Do you need to create or amend privacy notices (which inform the data subject at the point of collection how their information will be used)?

Will your actions interfere with the right to privacy under [Article 8 of the European Convention on Human Rights](#) (right to respect for private and family life)?

Will any information from the project be published on the Internet or in other media?

Will a third party contractor be involved in the data processing process?

Have you identified the social need and aims of the project?

Are your actions a proportionate response to the social need, and why?

Principle 2

Personal data shall be obtained only for one or more specified and lawful purposes, and shall not be further processed in any manner incompatible with that purpose or those purposes.

Does your project plan cover all of the purposes for processing personal data?

Have potential new purposes been identified as the scope of the project expands?

Principle 3

Personal data shall be adequate, relevant and not excessive in relation to the purpose or purposes for which they are processed.

Is the information you are using of good enough quality for the purposes it is used for?

Which personal data could you not use, without compromising the needs of the project?

How will you ensure that only data that is adequate, relevant, and not excessive in relation to the purpose is processed?

Principle 4

Personal data shall be accurate and, where necessary, kept up to date.

If you are procuring new software does it allow you to amend data when necessary?

How will you ensure that personal data obtained from individuals or other organisations is accurate?

Principle 5

Personal data processed for any purpose or purposes shall not be kept for longer than necessary for that purpose or those purposes.

What retention periods are suitable for the personal data you will be processing?

Are you procuring software which will allow you to delete information in line with your retention periods?

What processes will be put in place for the destruction of the data?

Principle 6

Personal data shall be processed in accordance with the rights of data subjects under this Act.

Will the systems you are putting in place allow you to respond to subject access requests more easily?

If the project involves marketing, have you got a procedure for individuals to opt out of their information being used for that purpose?

Principle 7

Appropriate technical and organisational measures shall be taken against unauthorised or unlawful processing of personal data and against accidental loss or destruction of, or damage to, personal data.

Where, and in what format, will the personal data be kept?

Will an IT system or application be used to process the personal data?

Do any new systems provide protection against the security risks you have identified?

What training and instructions are necessary to ensure that staff know how to operate the system securely?

Will staff ever work away from the office (e.g. on laptops, tablets, or smart phones)?

How will access to the personal data be controlled?

Principle 8

Personal data shall not be transferred to a country or territory outside the European Economic Area (EEA) unless that country or territory ensures and adequate level of protection for the rights and freedoms of data subjects in relation to the processing of personal data.

Will the project require you to transfer data outside of the EEA?

If you will be making transfers, how will you ensure that the data is adequately protected?

If a contractor is being used to process the personal information, where are they (and their data stores) based?

Section 5 - Summary of Identified Risks

Completing the questions in Section 4 will hopefully have identified areas in your project where personal data is at risk.

Use this section to summarise those risks.

Privacy Issue

Risk to Individual

Risk to the Council

Privacy Issue

Risk to Individual

Risk to the Council

Privacy Issue

Risk to Individual

Risk to the Council

Privacy Issue

Risk to Individual

Risk to the Council

Privacy Issue

Risk to Individual

Risk to the Council

Privacy Issue

Risk to Individual

Risk to the Council

Privacy Issue

Section 6 - Identify Privacy Solutions

For each of the risks identified in Section 6, describe the actions you could take to reduce them, and any future steps which would be necessary (e.g. the production of new guidance or future security testing for systems).

Risk

Solution

Result

Risk Eliminated

Risk Reduced

Risk Accepted

Is impact of solution on individuals justified, compliant, and proportionate?

Yes

No

Risk

Solution

Result

Risk Eliminated

Risk Reduced

Risk Accepted

Is impact of solution on individuals justified, compliant, and proportionate?

Yes

No

Risk

Solution

Result

Risk Eliminated

Risk Reduced

Risk Accepted

Is impact of solution on individuals justified, compliant, and proportionate?

Yes

No

Risk

Solution

Result

Risk Eliminated

Risk Reduced

Risk Accepted

Is impact of solution on individuals justified, compliant, and proportionate?

Yes

No

Risk

Solution

Result

Risk Eliminated

Risk Reduced

Risk Accepted

Is impact of solution on individuals justified, compliant, and proportionate?

Yes

No

Risk

Solution

Result

Risk Eliminated

Risk Reduced

Risk Accepted

Is impact of solution on individuals justified, compliant, and proportionate?

Yes

No

Section 7 - Privacy Impact Assessment Statement

This statement must be completed for all projects, regardless of whether a PIA was deemed to be necessary on completion of the screening questions in Section 1.

Name:

Position:

Project Summary:

Please choose one of the following options:

None of the screening statements in Section 1 of this document apply to the above project, and I have determined that it is not necessary to conduct a Privacy Impact Assessment.

Some of the screening statements in Section 1 of this document apply to the above project, and a need to carry out a Privacy Impact Assessment was identified. The assessment has been carried out, and the outcomes will be integrated into the project plan to be developed and implemented.

Date:

Once completed, please send a copy of this document to the Senior Legal Assistant (Information):

Email: foi.requests@southampton.gov.uk

Internal post: Corporate Legal, Civic Centre, Municipal, Ground Floor West

Document Information

Title: Privacy Impact Assessment

Author: Chris Thornton, Senior Legal Assistant (Information)

Version: v2.1

Owner: Information Governance Board on behalf of the Council's Management Team

Agreed by: Richard Ivory, Head of Legal and Democratic Services

Effective from: 17th July 2015

Review Date: 17th July 2016

Revision History:

06/12/13 - Version 1.0 - Reviser: Vikas Gupta - Document Created

10/03/15 - Version 2.0 - Reviser: Chris Thornton - Updated to PDF form format

17/07/15 - Version 2.1 - Reviser: Chris Thornton - Added information re report in introduction

14/01/16 - Version 2.2 - Reviser: Chris Thornton - Added screening question

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Equality and Safety Impact Assessment

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 the budget proposals and consider mitigating action.

<p>Name or Brief Description of Proposal</p>	<p>Sufficiency of early years places within the Millbrook, Redbridge and Maybush (MRM) Children’s Centre locality.</p> <p>As there is now sufficient and sustainable quality early years places in the area provided by the private, voluntary and independent sector; and it is not a mandated requirement of the children centre to directly deliver a pre-school, it is recommended that the pre-school is closed to enable new 0-19 Family Hub operating capacity at Pickles Coppice, the key delivery premise in Millbrook.</p>
<p>Brief Service Profile (including number of customers)</p>	<p>This half day pre-school is run by the Council as an element of the MRM designated Children’s Centre activity.</p> <p>The pre-school currently has 20 children who attend; 18 attend the full five morning sessions and 2 attend four morning sessions.</p> <p>12 children will start Yr R in schools in September 2017.</p> <p>There are 5 children aged 3 years.</p> <p>There are 3 children aged 2 years old (2 attending for only four sessions a week): of these two year olds 2 children will be three years old in August or before.</p> <p>It is anticipated that there will be 7 children aged 3 years and 1 child aged 2 years (8 in total) needing places in September.</p>

<p>Summary of Impact and Issues</p>	<p>This pre-school is situated within one of the City's most deprived areas and is attended by local children whose need for high quality early years education is paramount to improving outcomes.</p> <p>The pre-school was originally started 3 years ago to meet the need for additional 2 year old places as then required by the government's new free 2 year old early years entitlement policy.</p> <p>The families already engaged with Sure Start MRM knew and trusted staff and felt comfortable to put their children in the pre-school whilst other providers increased their capacity.</p> <p>Children's Centres service activity does not mandate the direct delivery of early years places as the Council's Early Years sufficiency duty is met and provided for in the main by the private, voluntary and independent early years sector. Of the city's 14 Children's Centres only one other is running a pre-school in an area of identified shortfall (Central – Clovelly).</p> <p>SCC early years policy is that the Council is the provider of 'last resort' so as to develop a healthy market of sustainable private, voluntary and independent (PVI) providers of high quality early years places.</p> <p>As part of developing the Early Help Children's Centres services into 0-19 Family Hubs with closer integration with Public Health current premises used in the area are being rationalised with Pickles Coppice (Millbrook) and the Ashby Centre (North Shirley) to be the future two key operating venues for the West locality. 'Satellite' premises used such as the 'Footsteps' community building at Mason Moor Primary school are being supported to find alternative users, such as by new pre-school providers. These developments require the existing children centre activity, such as parent training and crèche provision that are currently delivered from these premises to be moved to our main bases.</p> <p>Posts are not at risk and impacted pre-school staff can be re-deployed within Children's Centres and across the Council's other pre-schools within phase 3 proposed establishment and bottom line financial implications have been accounted for.</p>
<p>Potential Positive Impacts</p>	<p>The Early Years team have confirmed that there are sufficient places in the locality and as part of their detailed assessment of available sustainable childcare have provided the local Children Centre team with a list of early years providers with current vacancies which the team will use to support parent's access to. A new pre-school to be run by YMCA has been commissioned by Early Years in the nearby 'FootSteps' premises of Mason Moor</p>

	Primary School which is to commence from September 2017, subject to Ofsted. This new setting will further enhance parent's choices to access good quality local early years provision. The specification requires partnership working with the Children Centre and school to deliver local community activities and services. It will support the Children's Centres role in the delivery and co-ordination of the early identification of child and family need and swift access to joined-up services to help and to get a good start in life. The YMCA has a proven track record of delivering high quality services judged good or outstanding. Long term sustainability has been evidenced. It is a contractual condition of the award for the YMCA to fully participate in delivery of places for 2 year olds, and the new 30 hour agenda. It is registered for a maximum of 60 places and is open beyond just term time.
Responsible Service Manager	Jason Murphy
Date	24.07.17

Approved by Senior Manager	Jo Cassey
Signature	
Date	24.07.17

Potential Impact

Impact Assessment	Details of Impact	Possible Solutions & Mitigating Actions
Age	It is anticipated that there will be 7 children aged 3 years and 1 child aged 2 years (8 in total) needing places from next term.	There are sufficient local vacancies and families would be supported and signposted to alternative quality and sustainable local provision by Children Centre staff, including the new 60 place YMCA pre-school at the FootSteps venue of Mason Moor Primary School starting next term.
Disability	No Impact	

Gender Reassignment	No Impact	
Marriage and Civil Partnership	No Impact	
Pregnancy and Maternity	No Impact	
Race	No Impact	
Religion or Belief	No Impact	
Sex	No Impact	
Sexual Orientation	No Impact	
Community Safety	No Impact	
Poverty	No Impact	
Other Significant Impacts	Existing pre-school users would be required to find alternative childcare provision; but would still be able to access the full core offer of MRM Children's Centre services.	Families will have greater choice and access to high quality sustainable local early years provision run by the PVI sector.