

Cabinet

DOCUMENTS FOR THE MEMBERS ROOM

Tuesday, 17th September, 2019
at 4.30 pm

MEMBERS ROOM DOCUMENTS ATTACHED TO THE
LISTED REPORTS

Contacts

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MEMBERS ROOM DOCUMENTS

- 10 **ALLOCATIONS POLICY AND GYPSY TRAVELLER SITE ALLOCATION POLICY**
(Pages 1 - 8)
- 11 **M27/M3 TRAVEL DEMAND MANAGEMENT PROJECT** □ (Pages 9 - 10)
- 12 **SECURITY SERVICES CONTRACT** □ (Pages 11 - 22)

Monday, 9 September
2019

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 proposals and consider mitigating action.

Name or Brief Description of Proposal	Allocations Policy																																																											
Brief Service Profile (including number of customers)																																																												
<p>The Allocations Policy sets out Southampton City Council’s (the council) approach to allocating social housing homes in Southampton pursuant to Section 166A of the Housing Act 1996. It sets out how the council determines priorities and the procedure for allocating housing accommodation in Southampton.</p> <p>There is a huge demand for affordable rented homes in Southampton and this demand continues to considerably outstrip supply, with waiting times of 7-8 years now common for some types of property. In September 2017 there were approximately 8,191 live applications for housing in Southampton compared to approximately 1,188 lets available. The table below shows the total number of lets by size against housing demand of live applications:</p> <p><i>Figure 3.3.13: Housing register – total number of lets by property size and snapshot of housing demand of live applications and eligible to bid for property size</i></p> <table border="1"> <thead> <tr> <th rowspan="2">Type</th> <th colspan="5">Total number of lets</th> <th colspan="2">Demand of live applications</th> </tr> <tr> <th>2012/2013</th> <th>2013/2014</th> <th>2014/2015</th> <th>2015/2016</th> <th>2016/2017</th> <th colspan="2">Sep-17</th> </tr> </thead> <tbody> <tr> <td>Studio</td> <td>67</td> <td>60</td> <td>68</td> <td>62</td> <td>73</td> <td rowspan="2">Studio/1 bed</td> <td rowspan="2">4928</td> </tr> <tr> <td>1 bed</td> <td>482</td> <td>531</td> <td>549</td> <td>586</td> <td>524</td> </tr> <tr> <td>2 bed</td> <td>417</td> <td>482</td> <td>518</td> <td>537</td> <td>413</td> <td>2 bed</td> <td>1677</td> </tr> <tr> <td>3 bed</td> <td>173</td> <td>239</td> <td>267</td> <td>154</td> <td>166</td> <td>3 bed</td> <td>1232</td> </tr> <tr> <td>4 bed</td> <td>7</td> <td>25</td> <td>45</td> <td>16</td> <td>12</td> <td>4+ bed</td> <td>354</td> </tr> </tbody> </table> <p>Source: Southampton City Council</p>								Type	Total number of lets					Demand of live applications		2012/2013	2013/2014	2014/2015	2015/2016	2016/2017	Sep-17		Studio	67	60	68	62	73	Studio/1 bed	4928	1 bed	482	531	549	586	524	2 bed	417	482	518	537	413	2 bed	1677	3 bed	173	239	267	154	166	3 bed	1232	4 bed	7	25	45	16	12	4+ bed	354
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<p>In order to ensure that resources are being allocated effectively and efficiently</p>																																																												

the council must have an Allocations Policy which defines a consistent framework, which can be used to allocate the limited number of vacancies that are available.

The council aims to:

- provide affordable housing, for local residents, in housing need;
- ensure homes are allocated fairly and efficiently, taking into account the applicant's individual needs;
- make best use of all the available social housing homes; and
- give people the opportunity to express preferences about housing accommodation to be allocated to them.

Summary of Impact and Issues

The Allocations Policy has not been reviewed since 2016 and, therefore, does not reflect the council's latest position in terms of regulation and processes. The updated policy does not represent any fundamental changes to the policy or service, but instead clarifies what the council is already doing. The policy has also been updated to reflect the latest legislation in terms of the allocation of social housing.

This policy does not include applications in respects of homelessness or lets of caravan pitches to gypsies and travellers. However, this is dealt with under different legislation and policies.

The council recognise that there is far more demand for social housing than current supply can meet and that social housing providers in the city will look to a range of housing options in response to this. The council will support measures to introduce innovative arrangements which make best use of scarce resources. The council also encourage our housing partners, wherever possible, to provide accommodation which is both sustainable and secure and contributes to long-term community stability.

Potential Positive Impacts

As a social landlord the council has a number of objectives to shape the way in which housing services are delivered. Meeting the greatest possible degree of housing demand is a key objective but to do this in a way which supports individual households, enhances community stability and recognises the difficulties parts of our community face.

The council will also use its role as the largest landlord in the city to improve the lives of our residents wherever possible. This includes not only paying attention to the physical environment but also taking action to address issues affecting our residents.

The Allocations Policy will allow the council to continue to allocate the city's social housing stock and ensure it is used to its best effect so that homelessness is avoided wherever possible and allow the council maximise the opportunity for Southampton residents to access housing suitable for their needs.

Responsible Service Manager	Nick Bryant, Allocations Manager
Date	29 August 2019
Approved by Senior Manager	Liz Slater, Service Lead, Assessment, Planning and Options Housing, Adults and Communities
Date	29 August 2019

Potential Impact

Impact Assessment	Details of Impact	Possible Solutions & Mitigating Actions
Age	No identified impact	
Disability	No identified impact	The council have specialist officers that assess whether applicants require urgent re- housing on disability, medical or welfare grounds. They will also assess the type of housing needed and the urgency of any need. A very small proportion of applicants are assessed as having an urgent need to move because of disability, medical or welfare grounds.
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	Applicants with a priority need, who have not contributed to their

Impact Assessment	Details of Impact	Possible Solutions & Mitigating Actions
		homelessness and meet the main homelessness duty within the meaning of Part 7 of the Housing act 1996/ Homelessness Act 2002 (S193).
Health & Wellbeing	No identified impact	
Other Significant Impacts	No identified impact	<p>The law requires Local Authorities to give extra help to certain categories of armed forces personnel. The council meet this requirement through allowing relevant applicants to join the Housing Register and to be treated as if they were 'qualifying' applicants under the scheme.</p> <p>Applicants meeting one or more of the following criteria will be admitted to the Housing Register and awarded the 90 housing need (reasonable preference) points to bring them in line with other qualifying applicants.</p>



Equality and Safety Impact Assessment

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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	Gypsy Travellers Site Allocation Policy
Brief Service Profile (including number of customers)	
<p>The Gypsy and Travellers Site Allocation Policy sets out Southampton City Council's (the council) approach to allocating pitches at the council's Kanes Hill site, located in Botley Road, Thornhill. It sets out how the council determines priorities and the procedure for allocating pitches.</p> <p>At present, the council provides an authorised fixed site with a total of 14 residential pitches for Travellers at Kanes Hill. As such, there is a high demand from Gypsy and Travellers for permanent sites in Southampton. The purpose of the Gypsy and Travellers Site Allocations Policy is to define a consistent framework, which can be used to allocate the limited number of vacancies that are available.</p> <p>Gypsy's and Travellers is used as a generic term to denote the whole population of those groups, families and individuals who subscribe to Gypsy and Traveller culture and/or lifestyle. The term encompasses ethnic Gypsies and Travellers and those who fall within the legal definition of a 'Gypsy' (s24 of the Caravan Sites and Control of Development Act 1960 as amended by s80 of the Criminal Justice and Public order Act 1994).</p> <p>The council aims to:</p> <ul style="list-style-type: none"> • Provide both eligible and qualifying applicants with a pitch • Ensure pitches are allocated fairly and efficiently, taking into 	

<p>account the applicant's individual needs;</p> <ul style="list-style-type: none"> • Make best use of all the available pitches. 	
Summary of Impact and Issues	
<p>The council acknowledges that the right to choose to lead a nomadic existence is in law and that it is not the role of a local authority to endorse, disrupt or discourage this lifestyle.</p> <p>The development of this policy will allow the council to clarify its position on how it intends to allocate pitches at Kanes Hill and will reflect the latest position in terms of regulation and processes. This policy does not represent any significant changes to service, but will outline what the council is already doing.</p>	
Potential Positive Impacts	
<p>The Gypsy Travellers Site Allocation Policy will allow the council to continue to allocate pitches at Kanes Hill and ensure it is used to its best effect so that homelessness is avoided wherever possible. Furthermore, this policy will allow the council to maximise the opportunity for Gypsies and Travellers to access pitches suitable for their needs.</p>	
Responsible Service Manager	Matt Luik, District Housing Manager
Date	29 August 2019
Approved by Senior Manager	Steve Smith, Service Lead Council Housing & Neighbourhoods Adults, Housing, & Communities
Date	29 August 2019

Potential Impact

Impact Assessment	Details of Impact	Possible Solutions & Mitigating Actions
Age	No identified impacts	
Disability	No identified impacts	The council have specialist officers that assess whether applicants require urgent re-housing on disability, medical or welfare grounds. A very small proportion of applicants are assessed as having an urgent need to move because of disability, medical or welfare grounds.
Gender Reassignment	No identified impacts	
Marriage and	No identified impacts	

Impact Assessment	Details of Impact	Possible Solutions & Mitigating Actions
Civil Partnership		
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	No identified impacts	
Health & Wellbeing	No identified impacts	
Other Significant Impacts	No identified impacts	

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Equality and Safety Impact Assessment

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Name or Brief Description of Proposal	<u>M27/M3 Travel Demand Management project.</u> Package of measures to mitigate the impact of Highways England’s Smart Motorways programme including the promotion of sustainable travel options for local commuters.
Brief Service Profile (including number of customers)	
£1,700,000 package of projects including Workplace Travel Planning and behaviour change support, strategic communications and marketing campaigns, and alternative transport options including bus priority, signalling improvements, rail discounts and some short term additional demand responsive transport for key sites. All projects are fully funded by Highways England.	
Summary of Impact and Issues	
The projects will help to mitigate the negative impact of disruption caused by roadworks along the M27, and then the M3, and it is anticipated that it will help to bring about lasting behaviour change with increased numbers of people using sustainable travel options for local trips either for work or other purposes.	
Potential Positive Impacts	
See above.	
Responsible Service Manager	Pete Boustred
Date	21/08/2019
Approved by Senior Manager	Sam Fox
Date	21/08/2019

Potential Impact

Impact Assessment	Details of Impact	Possible Solutions & Mitigating Actions
Age	Not applicable.	Not required.
Disability	There is the potential that new or improved bus/DRT measures implemented as part of the TDM project will lead to increased access to areas of the Solent sub-region not currently well served.	Not required.
Gender Reassignment	Not applicable.	Not required.
Marriage and Civil Partnership	Not applicable.	Not required.
Pregnancy and Maternity	Not applicable.	Not required.
Race	Not applicable.	Not required.
Religion or Belief	Not applicable.	Not required.
Sex	Not applicable.	Not required.
Sexual Orientation	Not applicable.	Not required.
Community Safety	Not applicable.	Not required.
Poverty	Not applicable.	Not required.
Health & Wellbeing	The project will help to increase active travel rates which will bring about associated improvements in the health and wellbeing of local people and improve air quality.	Not required.
Other Significant Impacts	Not applicable.	Not required.



Data Protection Impact Assessment

What is a Data Protection Impact Assessment?

A Data Protection Impact Assessment (“DPIA”) 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 DPIA 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 DPIA should benefit the Council by producing better policies and systems, and improving the relationship with individuals.

Why should I carry out a DPIA?

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

Not only is it a legal requirement in some cases, it is often the most effective way to demonstrate to the Information Commissioner’s Officer how personal data processing complies with data protection legislation.

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

A DPIA 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 DPIA?

The core principles of DPIA 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 Step 1 of this document should help you identify the need for a DPIA 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 DPIA?

Responsibility for conducting a DPIA should be placed at senior manager level. A DPIA has strategic significance and direct responsibility for the DPIA 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 DPIA 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 DPIA.

How do I carry out a DPIA?

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

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

After Step 5, the Information Lawyer (Data Protection Officer) will review the DPIA within 14 days of receipt, and complete the rest of the assessment within 28 days. The DPO will identify any privacy risks, and proposed measures to address them.

These measures must then be agreed by the project lead, Information Asset Owner or Administrator, and, in some cases, the Senior Information Risk Owner.

Advice can be found at the beginning of each section, but if further information or assistance is required, please contact the Information Lawyer (Data Protection Officer) on 023 8083 2676 or at information@southampton.gov.uk.

Data Protection Impact Assessment			
Version	3.0	Approved by	Data Protection Officer
Date last amended	2 nd November 2018	Approval date	2 nd November 2018
Lead officer	Chris Thornton, Information Lawyer (Data Protection Officer)	Review date	2 nd November 2019
Contact	information@southampton.gov.uk	Effective date	2 nd November 2019

Project Details

Name of Project
Security Services
Brief Summary of Project
To provide Key Holding and Manned Guarding Services for SCC
Estimated Completion Date
June 2019
Name of Project Lead
Paul Paskins

Details of Person Conducting DPIA

Name
Jason Dunham
Position
Sourcing/Contracts Manager
Contact Email Address
Jason.dunham@southampton.gov.uk

Step 1: Identify the need for a DPIA

Does your project involve... (tick all that apply)

- The collection of new information about individuals
- Compelling individuals to provide information about themselves
- The disclosure of information about individuals to organisations or people who have not previously had routine access to the information
- The use of existing information about individuals for a purpose it is not currently used for, or in a way it is not currently used
- Contacting individuals in ways which they may find intrusive
- Making changes to the way personal information is obtained, recorded, transmitted, deleted, or held
- The use of profiling, automated decision-making, or special category data¹ to make significant decisions about people (e.g. their access to a service, opportunity, or benefit).
- The processing of special category data¹ or criminal offence data on a large scale.
- Systematically monitoring a publicly accessible place on a large scale.
- The use of new technologies.
- Carrying out profiling on a large scale.
- Processing biometric or genetic data.
- Combining, comparing, or matching data from multiple sources.
- Processing personal data without providing a privacy notice directly to the individual.
- Processing personal data in a way which involves tracking individuals' online or offline location or behaviour.
- Processing children's personal data for profiling or automated decision-making or for marketing purposes, or offer online services directly to them.
- Processing personal data which could result in a risk of physical harm in the event of a security breach.

¹ personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and the processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person's sex life or sexual orientation

If you answered “yes” to any of these, please proceed to Step 2.

If none of these apply, please tick the below box, and return the form to the Information Lawyer (Data Protection Officer) at information@southampton.gov.uk

None of the screening statements in Step 1 of this document apply to the project, and I have determined that it is not necessary to conduct a Data Protection Impact Assessment

Step 2: Describe the processing

The nature of the processing
How will you collect data?
Through existing contracted 3 rd parties through a request for TUPE data
How will you use the data?
It will be sent out during tendering to all bidding parties
How will you store the data?
On SCC servers
How will you delete the data?
It will be held for 7 years for auditing and reference against future similar projects
What is the source of the data?
3 rd party existing contracted security organisations
Will you be sharing data with anyone?
With all 3 rd party tendering parties for the ITT for Security Services

Describe the scope of the processing
What is the nature of the data?
INFO: Detail the type of personal data being processed. List any fields that will be processed (e.g. name, address, data of birth, NHS number, video images)
Salary, length of service, annual leave entitlement, it will not include names, ages, DOB for the purposes of what is required for tendering.
Does it include special category or criminal offence data?
INFO: "Special category" data includes personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and the processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person's sex life or sexual orientation.
No

How much data will you be collecting and using?
As much relevant TUPE data as required
How often will the data be collected and used?
Just to be used during the ITT for Security Services and only collected once.
How long will you keep it?
7 years
How many individuals are affected?
Up to 10 persons
What geographical area does it cover?
It is required for SCC buildings Civic Centre, City Depot and OGS

Describe the context of the processing
What is the nature of your relationship with the individuals?
INFO: Detail who the data subjects will be (e.g. residents, carers, pupils, staff, professionals)
Security Guards employed by 3 rd Party security contractor
How much control will they have over their data?
None
Would they reasonably expect the Council to use their data in this way?
Yes
Do they include children or other vulnerable groups?
No
Are you aware of any prior concerns over this type of processing or security flaws?
No
Is the processing novel in any way?
INFO: Does it involve any innovative or new technology, or is the processing unique or unusual?
No

What is the current state of technology in this area?

Only using Excel spreadsheets to gather and communicate with.

Are there any current issues of public concern that should be considered?

No

Describe the purposes of the processing

What do you want to achieve?

Secure accurate costings from the ITT

What is the intended effect on individuals?

Possible TUPE to new 3rd party security contractor

What are the benefits of the processing – for the Council, and more broadly?

Better success in achieving accurate pricing for tender responses.

Step 3: Consultation process

Consider how to consult with relevant stakeholders

Describe when and how you will seek individuals' views – or justify why it's not appropriate to do so

Not appropriate for SCC to do this.

Who else do you need to involve within your organisation?

INFO: e.g. IT services, records management

SCC Stakeholders for security services.

Do you need to ask your processors to assist?

INFO: processors are third parties who will process the personal data on our behalf

No

Do you plan to consult information security experts, or any other experts?

No

Step 4: Assess necessity and proportionality

Describe compliance and proportionality measures

What is your lawful basis for processing? Please choose one of the following...

- The data subject has given consent
- The processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract
- The processing is necessary for compliance with a legal obligation to which the Council is subject
- The processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the Council
- The processing is necessary for the purposes of the legitimate interests pursued by the Council or by a third party

Does the processing actually achieve your purpose?

Yes

Is there another way to achieve the same outcome?

No

How will you prevent function creep?

INFO: Function creep is where data collected for one purpose is used for another purpose over time.

Data is held securely on SCC servers for use by authorised persons only within Procurement

How will you ensure data quality and data minimisation?

INFO: We should only use the minimum amount of personal data possible to achieve the purpose of the processing.

No age or personal name data will be used, minimum data only has been sought.

What information will you give individuals about the processing?

None not required for this exercise

How will you help to support their rights?

INFO: Data subject's rights include the right to access, rectify, erase, port, and restrict their data.

Through the Council's standard processes.

What measures do you take to ensure processors comply with the GDPR, and assist the Council in supporting individuals in exercising their rights?

ITT instructions to Tenderers rules of engagement are written into the ITT specifically requesting no improper use of any data during ITT.

How do you safeguard any international transfers of personal data?

n/a

Step 5: Send DPIA Form to the Data Protection Officer

After completing this part of the form, please send the document to the Information Lawyer (Data Protection Officer) at information@southampton.gov.uk

The DPO will review the information provided, and identify and assess the privacy risks.

Step 6: Identify and assess risks (DPO to complete)

Describe source of risk and nature of potential impact on individuals. Include associated compliance and corporate risks as necessary.	Likelihood of harm	Severity of harm	Overall risk
1. N/A	Remote, possible or probable	Minimal, significant or severe	Low, medium or high

Step 7: Identify measures to reduce risk (DPO to complete)

Identify additional measures you could take to reduce or eliminate risks identified as medium or high risk in step 5

Risk	Options to reduce or eliminate risk	Effect on risk	Residual risk
1.	N/A	Eliminated Reduced Accepted	Low Medium High

Comments from the Data Protection Officer

I am satisfied that all reasonable privacy risks have been identified and addressed.

Comments from the Senior Records Officer

No comments.

Step 8: Sign off

Item	Date	Notes
DPO reviewed DPIA and provided advice on:	4 th February 2019	DPO should advise on compliance, step 7 measures and whether processing can proceed
Senior Records Officer reviewed DPIA on:	4 th February 2019	SRO should advise on records management matters
Measures approved by Project Manager on:	N/A	Integrate actions back into project plan, with date and responsibility for completion
Comments from Project Manager:		
Residual risks approved by Information Asset Owner / Administrator on:	N/A	
Comments from IAO / IAA:		
Residual high risks approved by the Senior Information Risk Owner on:	N/A	If accepting any residual high risk, consult the ICO before going ahead
Comments from SIRO:		