

# Cabinet

## DOCUMENTS FOR THE MEMBERS ROOM

Wednesday, 19th October, 2016

To follow Extraordinary Council  
Meeting

MEMBERS ROOM DOCUMENTS ATTACHED TO THE  
LISTED REPORTS

### Contacts

Cabinet Administrator

Pat Wood

Tel: 023 8083 2302

Email: [pat.wood@southampton.gov.uk](mailto:pat.wood@southampton.gov.uk)

# MEMBERS ROOM DOCUMENTS

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Tuesday, 11 October 2016

SERVICE DIRECTOR, LEGAL AND GOVERNANCE



## Equality and Safety

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><b>Name or Brief Description of Proposal</b></p>	<p>Housing Related Support Review (single adults)</p>
<p><b>Brief Service Profile (including number of customers)</b></p>	<p>Housing Related Support (HRS) is a bracket term used for all services provided to vulnerable people or people in a housing crisis who need additional support to either obtain or sustain their housing.</p> <p>The activities covered under the bracket term of HRS cover a variety of skills required to live independently and range from managing own tenancy and understanding rights and responsibilities of a good tenant to developing personal qualities such as confidence in living independently and managing daily tasks with no (or some) support in order to sustain accommodation. HRS also plays an important role in joining up and building on community cohesion as it seeks to establish or improve good links with the local community and combat isolation. Its exact focus will vary depending on the client group and clients’ needs which will vary across age groups and primary need.</p> <p>It is proposed that Housing Related Support provided to people living in Southampton will be delivered through a number of different service elements and contracts.</p> <p>Each service element will operate as part of a wide range of services in the city which contribute to supporting service users to maximise their independence and enable access to appropriate housing with support. Services have a key role in helping service users to gain the skills and confidence to gain, manage and sustain their housing.</p> <p>The service will work with a variety of service users, most of whom will have a vulnerability around mental health, substance misuse, disability and/or homelessness.</p> <p>The future provision of housing related support, as set out in this service specification will seek to:</p> <ul style="list-style-type: none"> <li>• provide a flexible and responsive crisis intervention and prevention service to vulnerable people with support needs relating to gaining or maintaining a tenancy, including support to those who are homeless or at risk of becoming homeless.</li> </ul>

	<ul style="list-style-type: none"> <li>• for vulnerable adults, including those who are street homeless or at risk of street homelessness, to receive the support they require, in order to enable them to develop the skills to live as independently as possible and sustain their accommodation in the longer term.</li> <li>• provide a service that improves health and wellbeing, supports social inclusion and reduces the likelihood of them needing adult social care or other key services.</li> <li>• provide holistic support that helps prevents the breakdown, and repeat breakdown of tenancy, homelessness, hospital admission, custody or other forms of institutionalised care.</li> <li>• target individuals at an early stage and provide interventions which helps prevent escalation of need and helps sustain an individual's current housing situation where it is safe to do so.</li> <li>• enable service users to develop their capacity, at the earliest appropriate opportunity, to live independently so as to be able to maintain independent accommodation without the need for ongoing unnecessary intensive support.</li> <li>• support vulnerable people who are in crisis during a period of change in their life/ condition/ circumstances with the express aim of increasing the individual's level of independence</li> <li>• develop a culture of community cohesion around the provision of housing related support that enables individuals to build links within their communities and supports landlords to offer accommodation to adults with vulnerabilities.</li> </ul> <p>The service will be provided through one community based flexible support contract and four homeless contracts covering assessment, intensive support and life skills development.</p> <p>There will be continuity between support services. Where the service user agrees, their support plan and information will follow them into a new service.</p> <p>Elements of the service:</p> <ul style="list-style-type: none"> <li>• Assessment and intensive service</li> <li>• Homeless intensive support service</li> <li>• Homeless life skills support service 1</li> <li>• Homeless life skills support service 2</li> <li>• Flexible support service</li> </ul>
<p><b>Summary of Impact and Issues</b></p>	<p>The future housing related support will reconfigure the present provision to better respond to the needs of the individuals and of the City; it will streamline the move on process and improve support planning to reflect person centred support and contingency planning across services.</p> <p>The number of units of accommodation will stay the same, however, the way the support is distributed will change slightly. High needs accommodation will have allocated staff times and direct support hours. Accommodation covered within the flexible support service will cover a variety of accommodation, including designated and private rented accommodation. This will enable the support to respond more flexibly to the needs of the individuals by increasing or decreasing the number of hours of support (especially when in crisis). This will allow for the better use of the staff resource and support hours available. The merging of several small contracts should yield efficiencies within</p>

	<p>management structures, while having no impact on the level of face to face service offered.</p> <p>A dedicated gateway approach will be adopted to ensure fair access to all elements of the service and to streamline the move on pathway. It will also support in void reduction and ensure effective use of resources.</p> <p>The new provision will move away from designating accommodation based on clients' primary need and diagnosis (such as mental health, LD etc.) and move towards assessing needs based on vulnerability and complexity of the individual and their individual needs. The introduction of the gateway will support this process.</p> <p>The new provision places strong focus on person centred planning and multi-agency working. This will help individuals moving within the services to continue to work on the desired outcomes and support agencies in building a joint response to service users' needs, especially in crisis.</p> <p>Street homelessness and rough sleeping have been on the rise in Southampton. The proposals seek to maximise the usage and effectiveness of the homelessness provision with a strong drive for the preventative interventions and helping individuals to self-manage and avoid tenancy breakdown.</p> <p>The changes in the provision will help Southampton City Council in achieving its savings targets, and allow for greater efficiencies within the provision.</p> <p>This review has identified issues which are outside of SCC control which pose a risk to the way the support is delivered in the future; these impacts may also impact on the number of people accessing the provision. These include:</p> <ul style="list-style-type: none"> <li>- The introduction of the universal credit – it is estimated that more people will need help with budgeting and managing their rent arrears due to the change in the way the benefits are administered</li> <li>- Introduction of local housing allowance to social housing – this change will come into place for all tenancies signed after April 2017, and it will affect benefit entitlement from April 2018. This is a serious risk as the shortfall between LHA and the rents level in supported accommodation is significant, it will also make move on accommodation less affordable</li> <li>- Removal of automatic HB entitlement for people 18 – 21, although people who cannot return home are likely to be exempt</li> </ul>
<p><b>Potential Positive Impacts</b></p>	<p>1. Stress on preventative nature of the services to include strong information and advice narrative.</p> <p>Under the Care Act 2014 local authorities have a duty to provide universal services offering information and advice. Although I&amp;A provision is not directly a part of this review, a separate review is taking place to ensure SCC meets its statutory duty. Within HRS, flexible support element will be able to respond to people who are in a housing crisis and prevent evictions/ find alternative appropriate accommodation. This service will be able to equip people with the right</p>

skills to avoid crisis in the future. This provision will also play part in resettling people in move on and independent accommodation after they have been through the housing pathway, this is to prevent the 'revolving door' syndrome and help people sustain their accommodation in the long run.

2. Focus on community based provision and building up 'social capital'.

The services will be strongly encouraged to create new placements and encourage participation in the volunteering opportunities across the City. The services will be marked against outcomes relating to volunteering, take up of employment and educational opportunities, and informal learning. This is to ensure people going through the service have settled in the neighbourhoods and can actively contribute to building strong communities. Community involvement and strong social networks can reduce isolation and loneliness and this can improve someone's mental health and physical health which will further help the individuals lead a meaningful life. These objectives also support SCC priorities.

3. Stress on upskilling individuals and increasing their ability to live independently, or supporting individuals to maintain their independence levels (this could mean additional support put in place)

It is the ambition of Southampton's Better Care plan to ensure that as many people as possible can achieve their full potential. Also, SCC is committed to 'enable more people to live independently in their own homes', as per SCC Strategy 2014-2017. This is only possible when the individual has the right support or the right skills in place, and part of this review to promote this positive attitude to independence and discourage the use of institutional care, and build on the community engagement and community resilience. The provision will put a stress on educating staff and service users on self-service options in Southampton and promote access to information and guidelines services. This will help reduce future demand for the services and support people in managing their circumstances effectively, before they meet the crisis point. The provision is geared towards outcomes relating to a positive change in individuals' behaviour, situation, attitudes and circumstances. This is to ensure that at the point of leaving the housing pathway all individuals have the necessary skills such as managing their behaviour, managing tenancy, money, self-care (cooking, cleaning, healthy eating).

4. Stress on personalised approaches and interventions to meet individual needs in best accommodation/support setting

Personalised approaches are not only more effective in securing the engagement of the individual, but they also offer better outcomes in the long term. Personalisation brings the choice and empowerment to individual's support, and it allows for support to be flexible and adaptive to clients' needs. All of the HRS services support will be based on person-centred planning, the outcomes will be set up with a service user to meet their needs and aspirations. The services will be required to work together, and a single support plan will follow the individual throughout the move on pathway.

5. Introducing the gateway approach to ensure fair access to services

A unified and streamlined approach to processing referrals and deciding on appropriate accommodation will reduce the waiting times and ensure that needs are well met within the accommodation offer. A

	<p>strategic view over the provision will help in making the right accommodation choices to better suit the needs of individuals.</p> <p>6. Minimising of voids and maximizing on use of provision This proposal aims to ensure that the current stock is used as effectively as possible and accommodation waiting times are reduced to the minimum. Currently some provision has long term voids which bares costs to SCC and puts up the unit price, while other services have waiting lists. An overarching outlook on voids provided by the gateway will ensure that the waiting time and the voids are reduced to minimum. This would provide better value for money per bed space and reduce additional costs to SCC.</p> <p>7. Introduction of flexible support This provision will be able to respond quickly to the changing needs of people who are at risk of homelessness or need additional support to keep their housing. Lack of allocated hours per week means that the workers will be able to manage their case loads based on need of clients.</p>
<b>Responsible Service Manager</b>	<u>Sandra Jerrim</u>
<b>Date</b>	

<b>Approved by Senior Manager</b>	
<b>Signature</b>	
<b>Date</b>	

## Potential Impact

Impact Assessment	Details of Impact	Possible Solutions & Mitigating Actions
<b>Age</b>	The services are open to all 18 – 65 year olds. Older people may be considered if agreed by the gateway.	The review will not introduce the changes to the eligibility criteria based on age to 18 – 65 year olds. The new provision will allow for additional placements for people who are older than 65, based on their need and will work closely with services supporting 18 -25yr olds
<b>Disability</b>	Physical disability. Some disabled beds might be lost in the reshaping of the services.	Personalised support means that HRS will be better equipped to meet individual needs, including adaptations. Reviewers to ensure that the number of disabled beds is representative of the need – housing adaptations to be put in place when necessary.

Impact Assessment	Details of Impact	Possible Solutions & Mitigating Actions
	<p>Mental health – a lot of the clients accessing HRS will have MH issues. A reconfiguration of bed provision and move away from protected beds specifically purchased for people with mental health might mean a decrease in a number of beds available.</p>	<p>The review is meant to ensure a fair access to the services regardless of the type of need. People with MH issues will be able to access generic beds provision which will cater to their needs accordingly. In addition, greater prevention and early intervention agenda will ensure that people with MH needs can access the provision before the crisis point and receive appropriate support.</p> <p>ACTION: person centred planning and improved assessment of need will reduce this risk significantly. More flexible provision and more variety of provision will ensure better match between individual needs and accommodation available.</p>
<b>Gender Reassignment</b>	<p>People who have gone through the gender reassignment might struggle in large, generic needs projects.</p>	<p>A more flexible approach to support and accommodation will mean that individual needs can be met in a more flexible way and be more person-centred.</p>
<b>Marriage and Civil Partnership</b>	<p>The reconfiguring of the provision might make it easier for the same sex couples to find appropriate accommodation and support.</p> <p>It can be difficult to accommodate couples in hostels due the benefit restrictions and house rules.</p>	<p>A more flexible approach to support and accommodation will mean that individual needs can be met in a more flexible way and be more person-centred.</p> <p>Same sex couples may find it easier to receive support away from large hostels.</p> <p>ACTION: to ensure that the number of beds for couples is representative of the need. ACTION: to ensure that referral and assessment criteria do not disqualify against couples.</p>
<b>Pregnancy and Maternity</b>	<p>This provision is designed for single homeless as a primary group.</p> <p>Parents can access the accommodation based provision however the provision will not be able to accommodate children.</p> <p>Family specific services are provided elsewhere.</p>	<p>Personalised support planning will support individuals in maintaining their meaningful relationships.</p>
<b>Race</b>	<p>Some people might find it difficult to cope in</p>	<p>A more flexible approach to</p>



Impact Assessment	Details of Impact	Possible Solutions & Mitigating Actions
	supported housing environments due to their race.	<p>support and accommodation will mean that individual needs can be met in a more flexible way and be more person-centred.</p> <p>ACTION: person centred planning and improved assessment of need will aid this risk significantly. More flexible provision and more variety of provision will ensure better match between individual needs and accommodation available.</p>
<b>Religion or Belief</b>	Some people might find it difficult to cope in supported housing environments due to their religion or belief.	<p>A more flexible approach to support and accommodation will mean that individual needs can be met in a more flexible way and be more person-centred.</p> <p>ACTION: person centred planning and improved assessment of need will aid this risk significantly. More flexible provision and more variety of provision will ensure better match between individual needs and accommodation available</p>
<b>Sex</b>	<p>Men and women might have similar needs and issues which they need support with, however, homeless men and women can choose different ways to cope. In general, men are more likely to become homeless but women are more vulnerable while living on the streets than men.</p> <p>The provision does not include priority need based on sex.</p>	<p>A more flexible approach to support and accommodation will mean that individual needs can be met in a more flexible way and be more person-centred.</p> <p>ACTION: person centred planning and improved assessment of need will aid this risk significantly. More flexible provision and more variety of provision will ensure better match between individual needs and accommodation available.</p>
<b>Sexual Orientation</b>	Some people might find it difficult to cope in supported housing environments due to their sexual orientation.	<p>A more flexible approach to support and accommodation will mean that individual needs can be met in a more flexible way and be more person-centred.</p> <p>ACTION: person centred planning and improved assessment of need will aid this risk significantly. More flexible provision and more variety of provision will ensure better match between individual needs</p>

Impact Assessment	Details of Impact	Possible Solutions & Mitigating Actions
<b>Community Safety</b>	Lack of appropriate housing and no access to benefits might increase street begging and increase the perceived risk to the community.	<p>and accommodation available.</p> <p><b>ACTION:</b> There is a misconception that people begging on streets are homeless. This issue is currently addressed by council colleagues and some housing providers.</p> <p>Improved access to prevention and intervention work streams will mean that more people can access help early enough to avoid the crisis point. Bed based provision will be available.</p>
<b>Poverty</b>	<p>Reduced number of beds can increase the number of people sleeping rough or sofa-surfing.</p> <p>Increased access to information and advice (including information on consequences of homelessness) should mitigate the risk of poverty.</p>	<p>A more flexible approach to support and accommodation will mean that individual needs can be met in a more flexible way and be more person-centred. No planned reduction in number of units.</p> <p>The review will ensure that the new provision is able to notice vulnerability earlier and avoid a crisis (as a part of the prevention and early intervention work). The provision will seek to prioritise people in high need to avoid/alleviate the crisis.</p> <p><b>ACTION:</b> person centred planning and improved assessment of need will aid this risk significantly. More flexible provision and more variety of provision will ensure better match between individual needs and accommodation available.</p>
<b>Other Significant Impacts</b>	<p>Introduction of Local Housing Allowance to social landlords making supported accommodation rents unaffordable for service users.</p> <p>The one identified risk relates to people who are 18 – 21 under the proposals to change HB allocation. The changes would mean that this group is excluded from the support offered by HB.</p> <p>Housing and Planning Welfare reform bill impacting on the rent levels</p>	<p><b>ACTION:</b> Consider alternative streams of funding. Engage with housing associations at the earliest stage.</p> <p><b>ACTION:</b> consider unit price and affordability criteria when writing contracts, explore HRS options not tied to supported accommodation (e.g. floating support).</p> <p><b>ACTION:</b> monitor the market place and engage with the providers to</p>

Impact Assessment	Details of Impact	Possible Solutions & Mitigating Actions
	<p>Introduction of UC – research suggest that when claims are switched over to UC many claimants need additional support to open bank accounts, support with budgeting and rent payments.</p> <p>Uncertainty about changes with differing views on likely implementation of agreed changes to LHA</p>	<p>assess the impact</p> <p>Changes to the welfare and housing legislation (beyond the scope of this review) are likely to have a significant impact on different groups for different reasons, and in doing so have a direct impact on the decisions and service providers as a part of HRS provision in Southampton.</p> <p>Critical timeline informs key and critical decision points in the review and procurement process</p>

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### Equality and Safety

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><b>Name or Brief Description of Proposal</b></p>	<p>Housing Related Support Review (Young people, Young parents and Care leavers provision)</p>
<p><b>Brief Service Profile (including number of customers)</b></p>	<p>Housing Related Support (HRS) is a bracket term used for all services provided to vulnerable people or people in a housing crisis who need additional support to either obtain or sustain their housing.</p> <p>The activities covered under the bracket term of HRS cover a variety of skills required to live independently and range from managing own tenancy and understanding rights and responsibilities of a good tenant to developing personal qualities such as confidence in living independently and managing daily tasks with no (or some) support in order to sustain accommodation. HRS also plays an important role in joining up and building on community cohesion as it seeks to establish or improve good links with the local community and combat isolation. Its exact focus will vary depending on the client group and clients’ needs which will vary across age groups and primary need.</p> <p>For vulnerable young people, young parents and care leavers HRS is predominantly about preventing homelessness and avoiding negative risks and impacts associated with it by developing positive behaviour patterns which will help young people into adulthood.</p> <p>Its primary function is to ensure that all vulnerable young people have safe, suitable, accommodation that meets their needs and enables them to achieve timely move-on and move towards a productive, independent adulthood.</p> <p>This EISA considers the proposed reconfiguration of the current provision to increase the diversity of provision available and to better meet the needs of young people, young parents and care leavers. The proposals were developed over a period of time and based on stakeholders’ feedback, engagement events with the providers and SCC staff (Housing and Children Families Department), data and monitoring information, literature review and needs assessment, and recent Ofsted report and recommendations relating to housing for young people.</p>

In particular, the reconfiguration seeks to invest in the following:

- Preparation for living independently to include development of life skills and being housing-ready, improving of family relationships (to include mediation services) and tenancy training
- Development of robust emergency and short stay provision such as respite and emergency beds, short term supported lodgings, and assessment centres as a first step in the housing pathway for YP
- Longer term accommodation to increase the variety of accommodation (to include supported lodgings for YP) and number of move on flats, to include tailored provision to YP with high and challenging needs and to refocus on life skills and tenancy sustainment.

To achieve such a diversity of provision it is necessary to remodel the current provision. Based on the above, the following proposals have been drawn:

Lot 1a,b & c:

- 60 units of mixed type accommodation including 'house-parent' and trainer flats
- 20 units of high/complex/additional support needs with provision of 24 hour / 7 day staffing
- 25 units will be reserved for move on shared accommodation for older young people or who are able to live independently.
- 30 units of accommodation within shared houses and self-contained units for young parents (aged 16-19 years) and couples, where appropriate. Some with the provision of 24 hours staffing.

Lot 2:

- Supported Lodgings: to be used in an emergency (3-4 nights stay) or a longer term support (6-9 months); capacity of initially 10 beds going up to 20

Lot 3:

- Care leaver intensive support model (Pathways Budget) – Provision of accommodation and intensive flexible support for care leavers with complex needs

The changes in the model will not reduce the bed based capacity of provision, but they will change the reconfiguration of beds available and the type of placements available to broaden the choice for young people and to better meet their needs. The numbers of floating support placements are expected to be lower than currently.

The proposed changes will affect the following services:

- Combined Young People and Young Parents Accommodation Based Service, Provider: Chapter 1
- Housing Support service to young people – accommodation based, Provider: YMCA
- Floating Housing Support service to young people at risk and

	young parents in Southampton, Provider: No Limits
<p><b>Summary of Impact and Issues</b></p>	<p>The changes in the provision will reconfigure the number of beds and the type of provision available.</p> <p>In general, the changes will enable for a broader range of accommodation to be available to younger people, including emergency provision. This should have a positive impact on the support YP get when in crisis or in need of accommodation.</p> <p>The overall number of beds within the provision will be maintained, however, some of the supported accommodation beds will be substituted by supported lodgings beds. This was required to diversify the accommodation offer to better meet the needs of young people. The changes are to be implemented in a planned and managed transition.</p> <p>Floating support function will be incorporated into accommodation based contracts. This will reduce the number of support hours offered in total, but it would enable for some housing related support work to be carried out outside of supported housing projects. This decision was necessary to maintain the number of beds available in the provision given the financial constraints. Stakeholders' feedback suggested that the beds were critical for a successful delivery of the model, and that given the choice its number should not decrease. The possible negative impacts will be mitigated by the fact that young people will have access to other housing related support such as generic information advice under IAG workstream and adult floating support.</p> <p>Other issues which will have a significant impact on the provision (should they go ahead) relate to the welfare changes relating to young people and general changes to the supported housing sector. The exact detail will be known in the autumn 2016 and later, once the government confirms its plans towards the restrictions of HB on young people and other changes affecting supported accommodation (such as introduction of LHA into the supported housing sector). Local authorities are not able to influence the decisions regarding the benefits directly, but this is one of the risks which has been closely monitored to ensure that our provision can respond accordingly.</p> <p>This EISA is carried out on the basis these decisions and future plans remain unclear. There is a strong sense many of the vulnerable groups will be excluded, but this has only been confirmed for some groups of YP.</p> <p>This EISA considers the issues as current presented, taking into account the fine balance between moving towards procurement and potential changes driven by government decisions.</p>
<p><b>Potential Positive Impacts</b></p>	<p>1. Stress on preventative nature of the services to include strong information and advice narrative.</p> <p>Under the Care Act 2014 local authorities have a duty to provide universal services offering information and advice. Although I&amp;A provision is not directly a part of this review, a separate review is taking place to ensure SCC meets its statutory duty. Within HRS, the element of floating support will be able to respond to people who are in a</p>

housing crisis and prevent evictions/ find alternative appropriate accommodation. This service proposed will be able to equip people with the right skills to avoid crisis in the future. This provision will also play part in resettling people in move on and independent accommodation after they have been through the housing pathway, this is to prevent the 'revolving door' syndrome and help people sustain their accommodation in the long run.

2. Focus on community based provision and avoidance of institutionalised settings.

Community involvement and strong social networks can reduce isolation and loneliness and this can improve someone's mental health and physical health. SCC recognises the value strong communities can add to the City and has signed up to investing in social capital. The new housing related support provision will consist of supported lodgings (family based setting) and enough accommodation is supported housing, where young individuals will have an opportunity to learn life skills necessary for independent living and increase their confidence.

3. Stress on upskilling individuals and increasing their ability to live independently, or supporting individuals to maintain their independence levels (this could mean additional support put in place)

It is the ambition of Southampton's Better Care plan to ensure that as many people as possible can achieve their full potential. Also, SCC is committed to 'enable more people to live independently in their own homes', as per SCC Strategy 2014-2017. This is only possible when the individual has the right support or the right skills in place, and part of this review to promote this positive attitude to independence and discourage the use of institutional care, and build on the community engagement and community resilience. Outcomes set for the YP projects are focused around upskilling young people, gaining education and employment and job seekers' skills, understanding tenancies and responsibilities attached to having a tenancy, managing day to day routines such as cooking, cleaning, managing their behaviour, and managing money.

4. Stress on personalised approaches and interventions to meet individual needs in best accommodation/support setting

Personalised approaches are not only more effective in securing the engagement of the individual, but they also offer better outcomes in the long term. Personalisation brings the choice and empowerment to individual's support, and it allows for support to be flexible and adaptive to clients' needs. All of the HRS services support will be based on person-centred planning, the outcomes will be set up with a YP to meet their needs and aspirations.

5. Increased knowledge of options available via HRS route and increased education on homelessness.

Educating people on the consequences of homelessness and educating them on what is realistic within the housing pathway is said to help people to keep their housing and engage with the mediation services better. This has been recommended as best practice for young people, but adults also benefit from a clear understanding of the housing pathways. It is particularly relevant in Southampton, where independent and good quality accommodation can be expensive. It is important that YP leaving the provision have realistic expectations on the housing options and that their accommodation choices are sustainable.

6. Increased stress on mediation and allowing YP to return home



	<p>when possible.</p> <p>The provision seeks to expand its number of emergency beds in comparison to current provision. This is to aid the family crisis and allow YP to move away from a family home in crisis. Respite is proven to be beneficial in restoring family connections. Mediation is key in restoring the relationships and it helps families to address underlying issues. Literature suggests that children and YP achieve best outcomes when they are able to stay home.</p> <p>7. Broadening the range of accommodation and support options. The provision will seek to broaden the range of accommodation options and introduce new housing options for YP to better meet their needs.</p>
<b>Responsible Service Manager</b>	<u>Sandra Jerrim</u>
<b>Date</b>	

<b>Approved by Senior Manager</b>	
<b>Signature</b>	
<b>Date</b>	

### Potential Impact

Impact Assessment	Details of Impact	Possible Solutions & Mitigating Actions
<b>Age</b>	The review will impact all young people aged 16 – 25 who currently use or will qualify for housing related support. This includes 16 and 17 year olds and care leavers.	<p>The review will not introduce the changes to the eligibility criteria based on age.</p> <p>16 and 17 year olds and care leavers constitute a priority group over 18 – 25 year olds whom SCC has no corporate responsibility to. This makes this client group more likely to wait longer to access provision.</p> <p>The new services may help offer a wider range of services but they are unlikely to increase the offer to YP who are not in a priority group. This group can access adult provision and other advice and information support available in the City.</p>
<b>Disability</b>	The review will not change the number of units of accessible accommodation available for young people with disability.	N/A

Impact Assessment	Details of Impact	Possible Solutions & Mitigating Actions
<b>Gender Reassignment</b>	Culturally appropriate services from additional providers.	It is unlikely that young people under the age of 25 will have gone through a gender reassignment, however, a personalised approach to support and a broader variety of accommodation will help meet the need more effectively, where applicable.
<b>Marriage and Civil Partnership</b>	All of the providers do accommodate couples when appropriate and possible. The majority of couples have been supported in Teenage Parents Units, this provision will now reduce by five bed spaces.	It is thoughts that the change in the number of Teenage Parent Units will not affect couples in a negative way.  All of the providers will be expected to accommodate and work with couples whenever appropriate and practically possible.
<b>Pregnancy and Maternity</b>	The reconfiguration will reduce the number of mother and baby units available by five.	The reconfiguration was necessary to broaden the provision of accommodation for all YP. It was estimated that the new number of units (30) will be sufficient to meet the demand. As such impact will be minimal, if at all.
<b>Race</b>	Some people might find it difficult to cope in supported housing environments due to their race. Young people face increased pressure from families to remain within communities.	A broader range of accommodation and support options mean that individual needs can be met in a more flexible way and be more person-centred.  Supported lodgings will specifically recruit hosts from all community backgrounds to reflect the diversity of the City.  All of the providers will be expected to support individuals' cultural needs such as language support etc.
<b>Religion or Belief</b>	Some people might find it difficult to cope in supported housing environments due to their religion or belief.	A broader range of accommodation and support options mean that individual needs can be met in a more flexible way and be more person-centred.  Supported lodgings will specifically recruit hosts from all community backgrounds to reflect the diversity of the City.  All of the providers will be expected to support individuals' cultural

Impact Assessment	Details of Impact	Possible Solutions & Mitigating Actions
		needs such as language support etc.
<b>Sex</b>	Young men and women might have similar needs and issues which they need support with, however, homeless men and women can choose different ways to cope. In general, men are more likely to become homeless but women are more vulnerable while living on the streets than men. Young people are likely to be exploited or find inappropriate coping strategies when left with no support.	A broader range of accommodation and support options mean that individual needs can be met in a more flexible way and be more person-centred.
<b>Sexual Orientation</b>	Some people might find it difficult to cope in supported housing environments due to their sexual orientation.	A broader range of accommodation and support options mean that individual needs can be met in a more flexible way and be more person-centred.
<b>Community Safety</b>	Lack of appropriate housing and no access to benefits might increase street begging and increase the perceived risk to the community.	<p>There is a misconception that people begging on streets are homeless. This issue is currently addressed by council colleagues and some housing providers.</p> <p>Improved access to prevention and intervention work streams will mean that more people can access help early enough to avoid the crisis point. Bed based provision will be available including the emergency beds. Thorough assessment process is in place to ensure that people can access the service in a swift way. Priority needs identified through the provision will be adhered to.</p>
<b>Poverty</b>	Reduction in a floating support provision may mean that young people are more likely to reach crisis before they get the support they need.	<p>Increased access to information and advice (including information on consequences of homelessness) should mitigate this risk.</p> <p>A set of eligibility criteria will define a priority need to ensure that people in crisis get the support they need.</p>
<b>Other Significant Impacts</b>	Welfare reform to include: Introduction of local housing allowance to social housing Roll out of Universal Credit	Changes to the welfare and housing legislation (beyond the scope of this review) are likely to have a significant impact on

Impact Assessment	Details of Impact	Possible Solutions & Mitigating Actions
	<p>Lack of automatic entitlement for HB to 18 – 21 year olds</p> <p>Other:</p>	<p>different groups for different reasons, and in doing so have a direct impact on the decisions and service providers as a part of HRS provision in Southampton. The direction the Government is taking has been closely monitored by the project team and all of the risks have been considered.</p> <p>The Government has suggested that 18 – 21 year olds who are unable to return home will be exempt from new rules.</p> <p><b>ACTION:</b> Monitor welfare reform changes and consider the cost of the alternative streams of funding.</p> <p>All service providers appointed by SCC are required to meet legislation in respect of equality issues.</p>



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## 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.

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## 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.

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## 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.

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## 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 (Data Protection Officer) to record and review.

The Senior Legal Assistant (Data Protection Officer) will review the PIA within 14 days of receipt, and a draft PIA report will be issued within 28 days. The report will confirm 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 (Data Protection Officer) on 023 8083 2676 or at [information@southampton.gov.uk](mailto:information@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, facial recognition, or profiling.

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 5**.

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 5**.

## Section 2 - Identifying the Need for a PIA

---

Briefly explain what the project aims to achieve, what the benefits will be to the Council, to individuals, and to other parties.

## Section 3 - Describe the Information Flows

---

The collection, use, sharing, and deletion of personal data should be described here.



# Section 4 - Identifying the Privacy Risks

---

Answering the questions below will help 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.**

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What personal data will be collected and/or shared?

With whom will the personal data be shared?

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

## 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.

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\* 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?

How will individuals be informed at the point of collection about how their personal data will be used?

Will any personal data be published on the Internet or in other media? If yes, please provide details.

Will a third party contractor be processing the personal data on our behalf, or involved at any stage in the data processing process?

## 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.**

---

Do you envisage using the personal data for any other purpose in the future? If so, please provide details.

---

## Principle 3

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

---

Are you satisfied that the personal data processed is of good enough quality for the purposes proposed? If not, why not?

Is there any personal data that you could not use, without compromising the needs of the project? If yes, please provide details.

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

## Principle 4

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

---

Are you able to update and amend personal data when necessary, after it has been collected and recorded? Please provide details.

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?

How will you ensure the personal data is deleted in line with your retention periods?

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

## Principle 6

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

---

If an individual requested a copy of the personal data held about them, detail how this would be provided to them.

If the project involves marketing, have you got a procedure for individuals to opt out of their personal data 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? Please provide details.

How will this system provide protection against security risks to the personal data?

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

Will staff ever process the personal data away from the office (e.g. via paper files, on laptops, tablets, or smart phones)? If so, please provide details.

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 personal data outside of the EEA? If yes, please provide details.

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

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



# Section 5 - 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:

Estimated date of project completion:

---

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.

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Date:

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Once completed, please send a copy of this document to Corporate Legal.

Email: [information@southampton.gov.uk](mailto:information@southampton.gov.uk)

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

## Document Information

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**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

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### 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

27/01/16 - Version 2.3 - Reviser: Chris Thornton - Added project completion date to S7

24/01/16 - Version 2.4 - Reviser: Chris Thornton - Added service level for issuing reports

29/04/16 - Version 2.5 - Reviser: Chris Thornton - Removed sections 5 and 6, and revised questions



## 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.

<b>Name or Brief Description of Proposal</b>	Intensive therapeutic edge of care service for children
<b>Brief Service Profile (including number of customers)</b>	<p>A commissioned specialist 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.</p>
<b>Summary of Impact and Issues</b>	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.
<b>Potential Positive Impacts</b>	<ul style="list-style-type: none"> <li>• Where possible children remain safely at home with their birth parent(s) who have demonstrated</li> </ul>

	<p>an ability to change and parent more effectively.</p> <ul style="list-style-type: none"> <li>• Children are prevented from entering the care system unnecessarily potentially worsening outcomes.</li> <li>• More timely decisions for children who require alternative permanent care.</li> </ul>
<b>Responsible Service Manager</b>	Simon McKenzie
<b>Date</b>	03.10.16

<b>Approved by Senior Manager</b>	<i>JANE WHITE</i>
<b>Signature</b>	<i>Jane White</i>
<b>Date</b>	10.10.16

#### Potential Impact

<b>Impact Assessment</b>	<b>Details of Impact</b>	<b>Possible Solutions &amp; Mitigating Actions</b>
<b>Age</b>	No adverse impact – the service is available to children of all ages (0-18) and family backgrounds	N/A
<b>Disability</b>	As above	N/A
<b>Gender Reassignment</b>	As above	N/A
<b>Marriage and Civil Partnership</b>	As above	N/A
<b>Pregnancy and Maternity</b>	As above	N/A
<b>Race</b>	As above	N/A
<b>Religion or Belief</b>	As above	N/A

<b>Sex</b>	As above	N/A
<b>Sexual Orientation</b>	As above	N/A
<b>Community Safety</b>	As above	N/A
<b>Poverty</b>	As above	N/A
<b>Other Significant Impacts</b>	As above	N/A





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- (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?

How will individuals be informed at the point of collection about how their personal data will be used?

Will any personal data be published on the Internet or in other media? If yes, please provide details.

Will a third party contractor be processing the personal data on our behalf, or involved at any stage in the data processing process?

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Do you envisage using the personal data for any other purpose in the future? If so, please provide details.

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## Principle 3

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

---

Are you satisfied that the personal data processed is of good enough quality for the purposes proposed? If not, why not?

Is there any personal data that you could not use, without compromising the needs of the project? If yes, please provide details.

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

## Principle 4

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

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## Principle 7

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

Will an IT system or application be used to process the personal data? Please provide details.



How will this system provide protection against security risks to the personal data?

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

Will staff ever process the personal data away from the office (e.g. via paper files, on laptops, tablets, or smart phones)? If so, please provide details.

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## 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.**

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Will the project require you to transfer personal data outside of the EEA? If yes, please provide details.

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

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

# Section 5 - Privacy Impact Assessment Statement

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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:

Estimated date of project completion:

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Please choose one of the following options:

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Date:

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## Document Information

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**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

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### 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

27/01/16 - Version 2.3 - Reviser: Chris Thornton - Added project completion date to S7

24/01/16 - Version 2.4 - Reviser: Chris Thornton - Added service level for issuing reports

29/04/16 - Version 2.5 - Reviser: Chris Thornton - Removed sections 5 and 6, and revised questions