

Cabinet

DOCUMENTS FOR THE MEMBERS ROOM

Tuesday, 20th December, 2016
at 4.30 pm

MEMBERS ROOM DOCUMENTS ATTACHED TO THE
LISTED REPORTS

Contacts

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MEMBERS ROOM DOCUMENTS

8 ALTERNATIVE SERVICE DELIVERY MODEL FOR SOME COUNCIL SERVICES
(Pages 1 - 30)

- Equality and Safety Impact Assessment
- Privacy Impact Assessment
- Privacy Impact Assessment

9 COMMUNITY ASSET TRANSFER STRATEGY: PROGRESS AND REVIEW
(Pages 31 - 38)

- Equality and Safety Impact Assessment
- Privacy Impact Assessment

11 CONSORTIA COMMISSIONING OF INDEPENDENT FOSTER CARE
(Pages 39 - 44)

- Equality and Safety Impact Assessment
- Privacy Impact Assessment

Monday, 12 December 2016

SERVICE DIRECTOR, LEGAL AND GOVERNANCE



Equality and Safety Impact Assessment

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

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

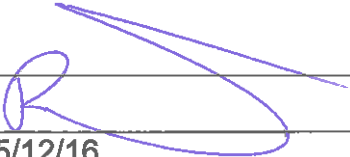
<p>Name or Brief Description of Proposal</p>	<p>The potential set-up of a Local Authority Trading Company (LATCo) for the management, delivery and commercialisation of the following Council services:</p> <ul style="list-style-type: none"> • Street Cleansing and Waste Management & Collection; • Housing Operations & Management and Parks & Open Spaces; • Car Park Operations, Facilities Management and Bridge Operations; • Transport.
<p>Brief Service Profile (including number of customers)</p>	<p>The services in scope are delivered across two service areas of the Council and affects 562.37FTEs. Housing Operations & Management and Parks & Grounds Maintenance sit within the Adults, Housing and Communities service area:</p> <ul style="list-style-type: none"> • The Housing Operations Team is responsible for the day to day maintenance and management of the Council’s 16,500 homes. This involves helping people to manage their tenancies as well as delivering 52,000 internal and external housing repairs each year. • The Parks and Grounds Maintenance Team

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

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

- **Car Park Operation Services**, which operate an in-house one stop shop approach to the management and maintenance of the city's car parks over a 7 day period from a workshop located in Paget Street Industrial Units. It is linked by dedicated fibre to all Multi Storey Car Parks to maintain the Pay on Foot System and to New City Depot for Control Room operators who monitor the help points and Pay on Foot System 24/7.
- **Facilities Management Services** are delivered for the City Depot & Recycling Park and new Granville Street depot. In addition support services are also delivered with the management of CCTV, cleaning contract, parking, security and reception services.

	<p>storage and containers for new developments (chargeable service); education and enforcement initiatives; management of the waste disposal contract; a household waste recycling centre; glass banks across the city and the management of textile banks across the city which generate income.</p>
Summary of Impact and Issues	<p>Customers: There is a risk that some service may experience a dip in performance during mobilisation of the services into the LATCo.</p> <p>Staff: Further work is required to determine the impact on staff in relation to secondment and / or TUPE arrangements and wider governance issues around the ownership and control functions of the Council.</p>
Potential Positive Impacts	<p>Customers: The LATCo will build on existing service quality and improve the service experience to customers (citizens, businesses and visitors) through the development and improvement of service offerings;</p> <p>Staff: The LATCo presents opportunities for employee engagement and empowerment through the potential beneficial trust involvement in the ownership of any company and / or performance related benefit opportunities.</p>
Responsible Service Manager	Mitch Sanders
Date	05/12/16

Approved by Senior Manager	Richard Crouch
Signature	
Date	05/12/16

	<p>Fleet Management is the central purchaser of vehicles and machinery to the Council. The department maintains, repairs and services c1000 vehicles and plant each year. The workshop includes 3 HGV inspection pits, 6 bays for smaller vehicles and plant, MOT test bay for Class 4, 5a and 7 vehicles, stores and fuel. The department is also responsible for vehicle management information, driver licence checks, damage recovery, repairs, vehicle hire and insurance claims as well as driver training and assessments.</p> <ul style="list-style-type: none">• Itchen Bridge provides support to drivers using the automated toll machines. Staff are responsible for managing the operations of the bridge (e.g. monitoring tolls machines and assisting drivers).• The Street Cleansing Service is organised into three District Teams (East, West and Central) and a specialist City Centre Team. The resourcing of the maintenance of the various land designations set out in the EPA supports a frequency of operation that ensures general compliance with the requirements of the Act (e.g. daily cleaning of zone 1 retail areas). Where an area is reported to fall below acceptable standards between routine visits, this will instantly generate a specific job task to be undertaken by the service's rapid response unit.• Waste Management Services provide weekly collection of household waste; fortnightly collection of recycling and glass; chargeable fortnightly collection of garden waste; chargeable bulky waste collection service and bulky block and voids service for Housing. Commercial Waste Service includes schools; advice and information for bin
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Potential Impact

Impact Assessment	Details of Impact	Possible Solutions & Mitigating Actions
Age	None	
Disability	None	
Gender Reassignment	None	
Marriage and Civil Partnership	None	
Pregnancy and Maternity	None	
Race	None	
Religion or Belief	None	
Sex	None	
Sexual Orientation	None	
Community Safety	None	
Poverty	None	
Other Significant Impacts	None	



Privacy Impact Assessment Report

1 PROJECT TITLE

TUS Part B

2 PROJECT DESCRIPTION

The Council is considering the next stage of development for services within Transport and Universal Services through the use of an Alternative Service Delivery Model.

3 SERVICE AREA

Transport and Universal Services

4 PRIVACY RISKS IDENTIFIED

None

5 PRIVACY RISK SOLUTIONS

N/A

6 PRIVACY RISK OUTCOMES

N/A

7 COMMENTS AND FURTHER RECOMMENDATIONS

The above recommendations are in addition to the measures already proposed by the service area within the PIA document itself, which have been deemed adequate on review.

It is recommended that further individual PIAs be carried out in respect of any solutions identified from this project.

8 SIGN-OFF

PIA reviewed by: Chris Thornton, Information Lawyer (Data Protection Officer)

PIA agreed on: 8th November 2016



What is a Privacy Impact Assessment?

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

Projects of all sizes could impact on personal data.

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

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

Why should I carry out a PIA?

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

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

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

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

When should I carry out a PIA?

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

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

Who should carry out a PIA?

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

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

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

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

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

How do I carry out a PIA?

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

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

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

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.

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.

* 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.

Date:

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

Email: information@southampton.gov.uk

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

Document Information

Title: Privacy Impact Assessment

Author: Chris Thornton, Senior Legal Assistant (Information)

Version: v2.1

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

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

Effective from: 17th July 2015

Review Date: 17th July 2016

Revision History:

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

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

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

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

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.

<p>Name or Brief Description of Proposal</p>	<p><u>Community Asset Transfer Programme: Kingsland Community Centre</u> To transfer Kingsland Community Centre to a community, voluntary or faith organisation, at less than market value, through a Community Asset Transfer (CAT).</p>
<p>Brief Service Profile (including number of customers)</p>	<p>Kingsland Community Centre is situated in the city centre, in the Bargate ward. The centre has two halls, kitchen and a meeting room which are available for hire by local groups and for private events. The site is wheelchair accessible.</p>
<p>Summary of Impact and Issues</p>	<p>Whist the centre hosts some regular groups it is currently underutilised and it is hoped that the CAT transfer in partnership with West Itchen Community Trust will help generate new users.</p> <p>When any potential impacts are identified, this assessment will be updated to reflect them.</p>
<p>Potential Positive Impacts</p>	<p>The Council wants to achieve the following outcomes through a proactive community asset transfer programme:</p> <ul style="list-style-type: none"> • Community empowerment and benefits to the wider local community • Capacity building through the use of local skills, experience, knowledge and time • Retaining valued local provision, thus improving

	<p>local services in times of austerity, while contributing to savings</p> <ul style="list-style-type: none"> • Delivering local services that address local needs through community led and community controlled assets • Extending the use of a building or land • Value for money and the ability to draw in other sources of funding not available to the council • Social enterprise and social well-being, including community cohesion • Financial viability, long term sustainability and external investment • Delivery of council objectives through other partners <p>A stimulus to partnership working</p>
Senior Project Officer	Sandra Zebedee
Date	4/11/2016

Approved by Responsible Service Manager	Vanessa Shahani
Date	4/11/2016

Potential Impact

Impact Assessment	Details of Impact	Possible Solutions & Mitigating Actions
Age	<p>No known impact</p> <p>The Census 2011 suggests that there is a relatively low percentage of people aged under 15 and over 65 in the Bargate ward – 84.5% of people who live in the area are of working age, higher than any other ward in the city.</p>	<p>As part of the application process for Asset Transfer the Council expects KRCA to consult with current users and local residents so they have a voice in the running of the centre in the future.</p>
Disability	<p>No known impact</p> <p>11% of residents in this area declared in the 2011 Census that they have a long-term health problem or disability that limits their day to day activities.</p>	<p>As part of the application process for Asset Transfer the Council expects KRCA to consult with current users and local residents so they have a voice in the running of the centre in the future.</p>
Gender Reassignment	<p>No known impact</p>	<p>As part of the application process for Asset Transfer the Council expects KRCA to consult with current users and local residents so they have a voice in the running of the centre in the future.</p>
Marriage and Civil Partnership	<p>The centre is available for party hire, which could include celebrations from marriage or civil partnership ceremonies.</p>	<p>As part of the application process for Asset Transfer the Council expects KRCA to consult with current users and local residents so they have a voice in the running of the centre in the future.</p>
Pregnancy and Maternity	<p>No known impact</p>	<p>As part of the application process for Asset Transfer the Council expects KRCA to consult with current users and local residents so they have a voice in the running of the centre in the future.</p>

Race	<p>No known impact</p> <p>The 2011 Census shows that the Bargate ward is one of the most ethnically diverse in the city. 64.5% of the residents identify themselves as being White British. 12% identify themselves as Asian/Asian British and 11.5% as Other White.</p>	<p>As part of the application process for Asset Transfer the Council expects KRCA to consult with current users and local residents so they have a voice in the running of the centre in the future.</p>
Religion or Belief	<p>The Community Centre currently hosts Majesty House; a Polish church group.</p> <p>The Census 2011 data suggests that in this ward Christianity is the most popular faith but the percentage is lower than in many neighbouring areas at 40.3%. 9.6% identified as Muslim and 1.9% as Hindu. 38.5% of residents defined themselves as having no faith; the highest percentage in any ward in Southampton.</p>	<p>As part of the application process for Asset Transfer the Council expects KRCA to consult with current users and local residents so they have a voice in the running of the centre in the future.</p>
Sex	<p>No known impact</p>	<p>As part of the application process for Asset Transfer the Council expects KRCA to consult with current users and local residents so they have a voice in the running of the centre in the future.</p>
Sexual Orientation	<p>No known impact</p>	<p>As part of the application process for Asset Transfer the Council expects KRCA to consult with current users and local residents so they have a voice in the running of the centre in the future.</p>
Community Safety	<p>Hampshire Police crime statistics from August 2016 report that in the area directly around the centre there were 8 crimes reported in the following</p>	<p>As part of the application process for Asset Transfer the Council expects KRCA to consult with current users and local residents so they</p>

	<p>categories:-</p> <ul style="list-style-type: none"> • Criminal Damage and Arson • Violence and Sexual Offences • Public Order • ASB • Vehicle Crime 	<p>have a voice in the running of the centre in the future.</p>
Poverty	<p>No known impact</p> <p>The Indices of Multiple Deprivation (IMD) 2015 indicated that Bargate Ward ranks amongst the 20% most deprived in the country.</p>	<p>As part of the application process for Asset Transfer the Council expects KRCA to consult with current users and local residents so they have a voice in the running of the centre in the future.</p>
Other Significant Impacts	<p>No known impact</p>	<p>As part of the application process for Asset Transfer the Council expects KRCA to consult with current users and local residents so they have a voice in the running of the centre in the future.</p>

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Privacy Impact Assessment Report

1 PROJECT TITLE

Community Asset Transfers

2 PROJECT DESCRIPTION

The pilot phase of the CAT program involves applications regarding the transfer of council owned community buildings to community, voluntary or faith organisations at less than market rent.

3 SERVICE AREA

Transformation

4 PRIVACY RISKS IDENTIFIED

- a) Personal Information will be kept for longer than is necessary.
 - i. Without an identified retention period, there is a risk that information will not be held for a reasonable period.

5 PRIVACY RISK SOLUTIONS

- a) Personal Information will be kept for longer than is necessary.
 - i. Identify an appropriate retention period for CAT application data (both electronic and hard copy), and put measures in place to ensure that it is adhered to.

6 PRIVACY RISK OUTCOMES

- a) Personal Information will be kept for longer than is necessary.
 - i. Risk Eliminated.

7 COMMENTS AND FURTHER RECOMMENDATIONS

The above recommendations are in addition to the measures already proposed by the service area within the PIA document itself, which have been deemed adequate on review.

8 SIGN-OFF

PIA reviewed by: Chris Thornton, Senior Legal Assistant (Data Protection Officer)

PIA agreed on: 29th September 2016

Review of measures to be carried out on: 29th December 2016



Equality and Safety Impact Assessment

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

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

<p>Name or Brief Description of Proposal</p>	<p><u>Consortia Commissioning of Independent Fostering Agency Placements</u> – award of providers to the South Central Framework agreement for Independent Fostering Agency (IFA) placements following the completion of a procurement process led by Southampton City Council on behalf of a sub-regional consortia comprising fourteen local authorities.</p>
<p>Brief Service Profile (including number of customers)</p>	<p>Looked After Children requiring fostering that cannot be accommodated using in-house provision. Currently there are 591 Looked After Children of which 201 children in IFA placements.</p>
<p>Summary of Impact and Issues</p>	<p>Effective and appropriate use of the Framework Agreement will give Southampton City Council and participating Authorities assurance of quality in the provision of independently provided foster care and price stability in what will otherwise be a market characterised by variable and escalating costs over the next 4 years.</p>
<p>Potential Positive Impacts</p>	<ul style="list-style-type: none"> • Best value and quality assurance in the purchase of independently provide foster care • Improved outcomes for children placed in independently provided foster care • Access to a greater pool of providers • Standardised individual contracts for each placement made under an overarching contract • Fixed prices for placements based on specific

	<p>ages/client need</p> <ul style="list-style-type: none"> • Alternatives to residential care options for children who would otherwise go into institutional care setting • Permanency as a care outcome for children at the earliest reasonably practicable point • Shared contract performance and management responsibility across the consortia • Adherence with legislation and standards • Capacity assurance for various need groups and geographical areas
Responsible Service Manager	<u>Chris Pelletier</u>
Date	

Approved by Senior Manager	
Signature	
Date	

Potential Impact

Impact Assessment	Details of Impact	Possible Solutions & Mitigating Actions
Age	There are no changes to the age of child eligible to access an IFA placement as a result of this tender.	N/A
Disability	There is a separate 'Lot' for Disabled Children under this Framework. The number of providers has increased under this Lot from 17 to 43, offering greater choice in placements for Disabled Children.	N/A
Gender Reassignment	N/A	N/A
Marriage and Civil Partnership	N/A	N/A
Pregnancy and Maternity	N/A	N/A
Race	A greater pool of providers means increased potential for better matching when making a	N/A

	placement .	
Religion or Belief	A greater pool of providers means increased potential for better matching when making a placement.	N/A
Sex	N/A	N/A
Sexual Orientation	N/A	N/A
Community Safety	N/A	N/A
Poverty	N/A	N/A
Other Significant Impacts	Whilst there are no substantive changes to how this Framework operates, ther	

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Privacy Impact Assessment Report

1 PROJECT TITLE

Independent Fostering Agency

2 PROJECT DESCRIPTION

Consortia commissioning of Independent Fostering Agency placements for Looked After Children via a framework.

3 SERVICE AREA

IFA Commissioning

4 PRIVACY RISKS IDENTIFIED

- a) Personal Information will not be secure.
 - i. Once a placement has been selected, there is a risk that the transfer of sensitive personal data will not be secure when passed to the provider, as the transfer of information between SCC and the provider is done verbally (either by telephone or face-to-face).
- b) Personal Information will not be accurate or up to date
 - i. As the transfer of information between SCC and the provider is done verbally (either by telephone or face-to-face), there is an increased risk to the accuracy of the data being transferred.

5 PRIVACY RISK SOLUTIONS

- a) Personal Information will not be secure.
 - i. Information should be handled in accordance with the Council's Data Handling and Reporting Incidents Policy, available online (https://staffinfo.southampton.gov.uk/Images/Information%20Security%20-%20Data%20Handling%20and%20Reporting%20Incidents%20Policy%20v1.0_tcm67-385071.pdf).

If sensitive personal information is being transferred verbally, extra care should be taken to ensure that conversations are not overheard by people who do not need to have access to the information.

- b) Personal Information will not be accurate or up to date
 - i. When transferring personal information verbally, extra care should be taken to confirm the details, to ensure the accuracy of the information is maintained.

Other methods of transfer should be explored, and a solution found that ensures that the transfer is both secure and maintains the accuracy of the information.

If verbal disclosures are to be used, guidance should be given to staff to reduce the risk of inaccurate transfers being made.

6 PRIVACY RISK OUTCOMES

- a) Personal Information will not be secure.
 - i. Risk reduced.
- b) Personal Information will not be accurate or up to date
 - i. As the transfer of information between SCC and the provider is done verbally (either by telephone or face-to-face), there is an increased risk to the accuracy of the data being transferred.

7 COMMENTS AND FURTHER RECOMMENDATIONS

The above recommendations are in addition to the measures already proposed by the service area within the PIA document itself (and related correspondence), which have been deemed adequate on review.

8 SIGN-OFF

PIA reviewed by: Chris Thornton, Information Lawyer (Data Protection Officer)

PIA agreed on: 8th December 2016

Review of measures to be carried out on: 8th March 2017