

DECISION-MAKER:	GOVERNANCE COMMITTEE
SUBJECT:	FREEDOM OF INFORMATION, DATA PROTECTION & REGULATION OF INVESTIGATORY POWERS ACTS: ANNUAL REVIEW 2018-19
DATE OF DECISION:	10 th June 2019
REPORT OF:	Service Director: Legal and Governance

CONTACT DETAILS

AUTHOR:	Name:	TRACY HORSPPOOL	Tel:	023 8083 2027
	E-mail:	Tracy.horspool@southampton.gov.uk		
Director	Name:	RICHARD IVORY	Tel:	023 8083 2794
	E-mail:	Richard.ivory@southampton.gov.uk		

STATEMENT OF CONFIDENTIALITY

None

BRIEF SUMMARY

A report detailing the statistical information for the financial year 2018-19 with regard to information governance. This report details statistical information on requests received under the Freedom of Information Act 2000 (FOIA), the Environmental Information Regulations 2004 (EIR), the General Data Protection Regulation (GDPR) and the Council's activity under the Regulation of Investigatory Powers Act 2000 (RIPA).

RECOMMENDATIONS:

(i)	To note and comment on the update of the statistical information for the year 1 st April 2018 – 31 st March 2019 relating to: <ul style="list-style-type: none"> • FOIA and associated legislation • GDPR • RIPA 2000
-----	--

REASONS FOR REPORT RECOMMENDATIONS

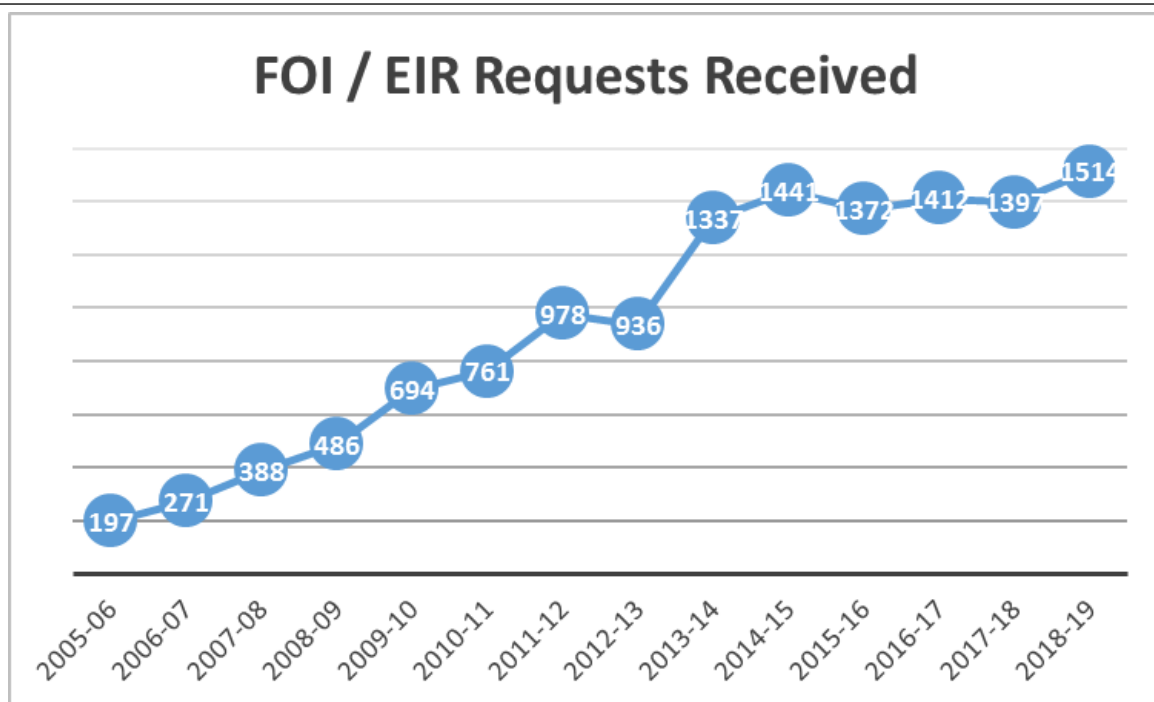
1.	To keep Members informed as to the impact of the legislation to the Council and to detail the form and type of information requests received in 2018-19.
2.	To ensure that Members continue to be aware of the Council's statutory obligations and compliance performance.

ALTERNATIVE OPTIONS CONSIDERED AND REJECTED

3.	The alternative to bringing this report before members is to not report the yearly analysis. This was rejected because it is considered to be good governance to report such matters to Members, provides an audit trail to demonstrate to the Information Commissioner that the Council has a robust structure in place to comply with the legislation, and to maintain the profile of information law requirements and resource implication within the organisation.
----	--

DETAIL (Including consultation carried out)

FOIA	
4.	The FOIA came fully into force on 1 st January 2005, marking a major enhancement to the accessibility of information held by public authorities.
5.	Running parallel to the FOI regime is the EIR, which gives a separate right to request environmental information from public authorities, the GDPR, which gives the individual the right to access their own personal data, and the Re-Use of Public Sector Information Regulations (RUPSIRs) which allow a requester to re-use (under licence) information provided to them by a public authority.
6.	Under the FOIA and associated legislation, anybody may request information from a public authority with functions in England, Wales and/or Northern Ireland. Subject to exemptions, the FOIA confers two statutory rights on applicants: <ul style="list-style-type: none"> (i) The right to be told whether or not the public authority holds that information; and (ii) The right to have that information communicated to them
7.	There are two types of exemptions that may apply to requests for information – absolute and qualified.
8.	Information that falls into a particular exemption category, for example information relating to commercial interests, will have to be disclosed unless it can be successfully argued that the public interest in withholding it is greater than the public interest in releasing it. Such exemptions are known as qualified exemptions.
9.	Where information falls within the terms of an absolute exemption, for example, information reasonably accessible by other means or information contained in court records, a public authority may withhold the information without considering any public interest arguments.
10.	The Council has now experienced the fourteenth full year of the FOIA, which yielded the highest number of FOI requests received by the Council to date.



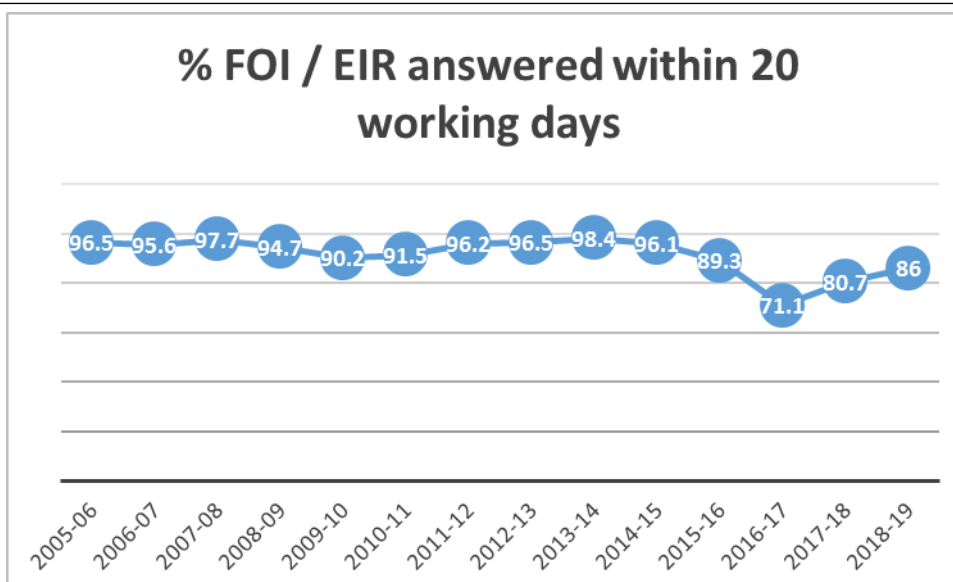
11. The number has increased from 1397 for the year to 1514, which bucks a trend in recent years of the number of requests leveling out. The area breakdown of the requests is as follows:

Directorate	No. Rec'd	%	Days
Svc Director Transactions & Universal Services	323	88.9	10.1
Svc Director Growth	256	87.8	12.0
Svc Director Children & Families	229	82.1	14.9
Svc Director Housing, Adults & Communities	187	82.4	14.2
Svc Director Strategic Finance & Commercialisation	176	93.1	10.2
Svc Director Digital & Business Operations	136	72.8	17.1
Svc Director HR and Organisational Development	72	86.1	13.6
Svc Director Legal & Governance	45	91.1	10.8
Svc Director Intelligence, Insight & Communications	41	95.0	11.2
Svc Director Public Health	24	83.3	14.2
Director of Quality & Integration	16	87.5	15.5
Requests on hold at time of report	9	N/A	N/A
Grand Total	1514	86.0	13.0

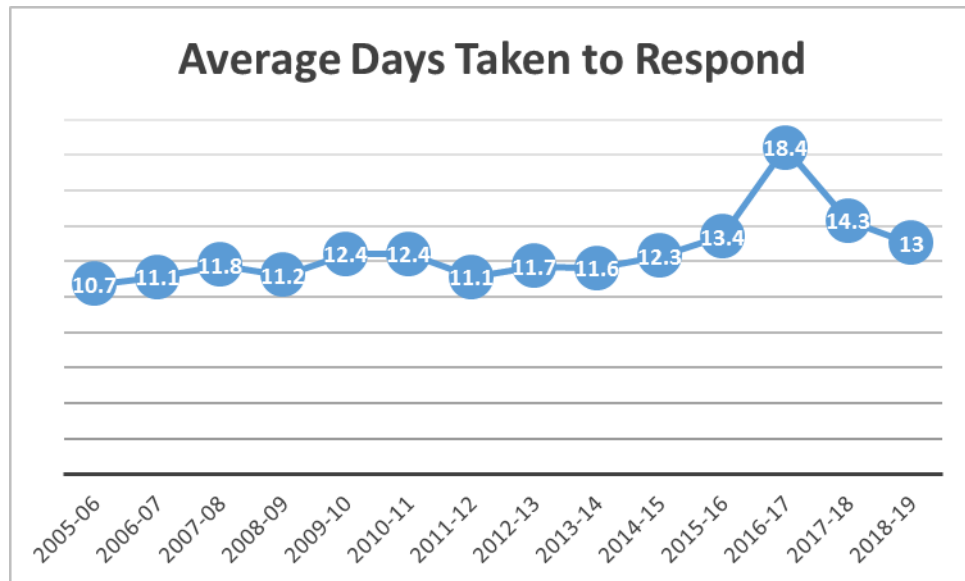
To summarise, the Council has received a total of 1514 requests between 1st April 2018 and 31st March 2019. This comprises 1510 dealt with as FOI requests and 4 EIR requests.

12. 2018/19 has seen an overall increase in the volume of requests received in comparison to previous years. The average number of requests received per month was 126, compared with 116 last year.

13. During the year, 86% of all monitored FOI and EIR requests (excluding those 'on hold' or lapsed) were dealt with within the statutory deadline of 20 working days. This is an increase on the previous year, and is due to measures put in place to address the low compliance rate of previous years.

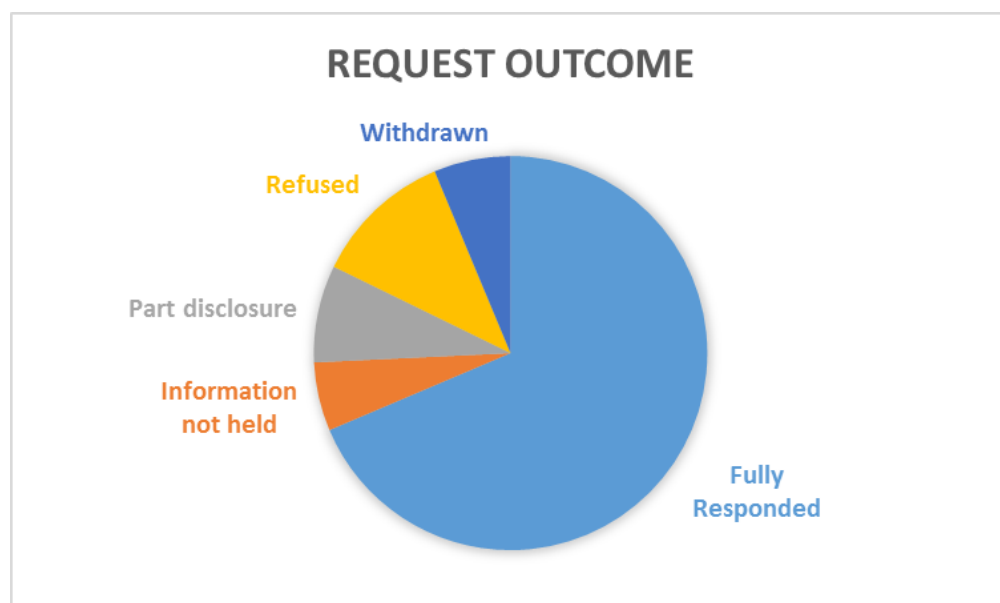


14. The overall response time has also been improved, with the Council responding to requests within 13 days on average.



15. Under FOIA, where the cost of responding to the request will exceed the Freedom of Information and Data Protection (Appropriate Limit and Fees) Regulations 2004 (which is currently set at £450 for local authorities), the Council may refuse to comply with it. For 2018/19, the Council issued 51 Refusal Notices on fees grounds, which represents a decrease, with 74 being issued last year.

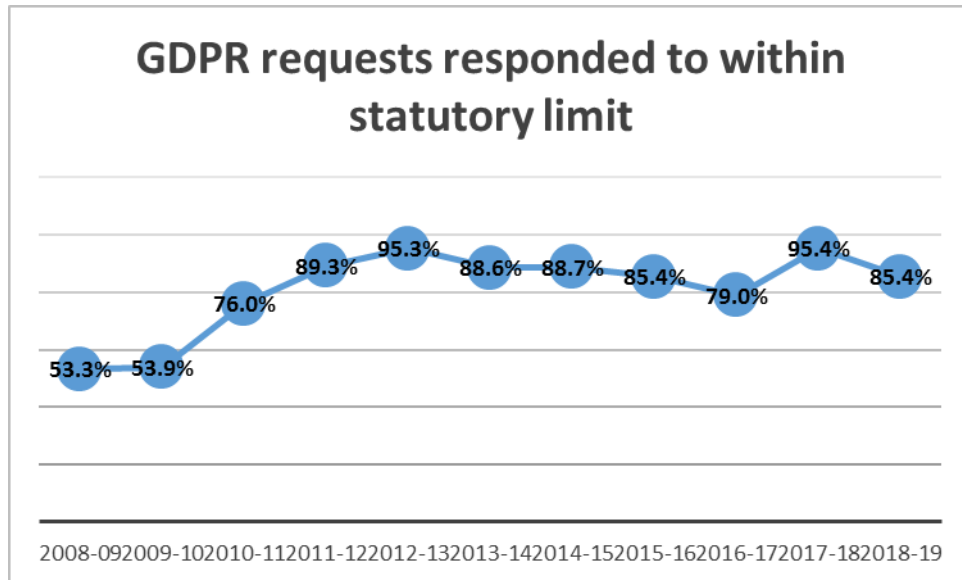
16. Of all requests received during the year, 68% of information requested was disclosed in full. Of the remaining requests, 6% of information was not held by the Council, 8% were partly responded to by the Council (i.e. some parts of the request were subject to an exemption), and 11% were completely refused as information was withheld because a fees notice was issued or it was exempt (e.g. requests for personal information such as individual/contact details or confidential/commercially sensitive contract or financial information). The remaining 8% of the requests were withdrawn or lapsed (the requester did not respond to a request for clarification after 3 months had passed).



17.	12 individuals requested internal reviews regarding decisions made to withhold, partially withhold information requested, or where they were generally unhappy with how their request was handled.																						
18.	This year, there has been no occasions where an appeal was made to the ICO as a result of the Council's decision in respect of their internal review.																						
19.	<p>As with all years, types of requests have been varied and covered every service area of the Council, including budget, HR, council tax and business rates data, schools, highways maintenance, and social services.</p> <p>The top ten request subjects ranked in order of popularity are as follows:</p> <table border="1"> <thead> <tr> <th>Service Area</th> <th>Requests</th> </tr> </thead> <tbody> <tr> <td>Corporate Planning and Commercialisation - Business rates</td> <td>111</td> </tr> <tr> <td>Education and Early Help - Schools</td> <td>74</td> </tr> <tr> <td>HR Operations - Human resources</td> <td>51</td> </tr> <tr> <td>Supplier Experience - Procurement</td> <td>48</td> </tr> <tr> <td>Strategic IT & Digital Client - Information communication technology</td> <td>45</td> </tr> <tr> <td>Provider Services - Adult social care</td> <td>45</td> </tr> <tr> <td>Children's Social Care - Children and young people social care</td> <td>40</td> </tr> <tr> <td>Planning, Infrastructure and Development - Highway maintenance</td> <td>35</td> </tr> <tr> <td>Planning, Infrastructure and Development - Planning services</td> <td>32</td> </tr> <tr> <td>Env'mnt St Scene & Health - HMO Licensing</td> <td>30</td> </tr> </tbody> </table>	Service Area	Requests	Corporate Planning and Commercialisation - Business rates	111	Education and Early Help - Schools	74	HR Operations - Human resources	51	Supplier Experience - Procurement	48	Strategic IT & Digital Client - Information communication technology	45	Provider Services - Adult social care	45	Children's Social Care - Children and young people social care	40	Planning, Infrastructure and Development - Highway maintenance	35	Planning, Infrastructure and Development - Planning services	32	Env'mnt St Scene & Health - HMO Licensing	30
Service Area	Requests																						
Corporate Planning and Commercialisation - Business rates	111																						
Education and Early Help - Schools	74																						
HR Operations - Human resources	51																						
Supplier Experience - Procurement	48																						
Strategic IT & Digital Client - Information communication technology	45																						
Provider Services - Adult social care	45																						
Children's Social Care - Children and young people social care	40																						
Planning, Infrastructure and Development - Highway maintenance	35																						
Planning, Infrastructure and Development - Planning services	32																						
Env'mnt St Scene & Health - HMO Licensing	30																						
20.	For the period covered in this report, 57% of requests came from private citizens, 17% came from companies/businesses, 12% from the media. The remaining 14% came from a combination of charities, students, researchers, lobby groups, MPs / Members and other Councils etc.																						
21.	<p>Previously, Members requested information as to how much time and resources each Service spends on dealing with requests. We do not record this information. Previous years (2011/12) have shown that it took Corporate Legal approximately 2 hours to respond to each request. However, current research from Parliamentary post-legislative scrutiny of the Act indicates "the best-performing local authorities took between one and six hours for each request".</p> <p>We can estimate that our time spend on requests is comparable to this, and using the £25 per hour rate that the Act allows us to charge for staff time when refusing requests, we can estimate that each request costs the Council between £25 and £150 to respond on average.</p>																						
22.	<p>As Corporate Legal accurately time record we are able to detail how much time it takes to log, monitor, and give advice on requests. For 2018/19, the average time taken per request was 0.74 hours. Most requests take around half an hour to action within the Corporate Legal Team but, where detailed exemptions and redactions are needed, this can increase time taken on a single request for very complex cases.</p> <p>For example, the Corporate Legal time spent over 16 hours on one single request in 2018/19. The average therefore predominantly represents the time taken for detailed application of legal tests to requests where the Council seeks to withhold certain information from release.</p>																						

23.	It should be stressed that this figure does not include the time taken for Business Support or the service areas to locate, collate, and send out the information requested and the Council does not have a mechanism for capturing that resource cost (which comprises the bulk of any cost to the Council).																								
24.	In the Corporate Legal team there are now 3 FTE member of staff dedicated to providing advice and monitoring compliance with information law. Other members of Legal Services and an innovative intern scheme with local and regional universities support this function when their capacity allows it.																								
GENERAL DATA PROTECTION REGULATION																									
25.	The GDPR gives individuals the right to know what information is held about them, along with other rights, and provides a framework to ensure that personal information is handled properly.																								
26.	<p>Under the GDPR, an individual is entitled to access personal data held by an organisation, of which that individual is the data subject. Such requests for information are known as subject access requests. Other requests available under the GDPR are:</p> <ul style="list-style-type: none"> • Rectification • Erasure • Restriction • Object • Portability 																								
27.	<p>For the year 2018/19, the Council received 205 GDPR, requests compared with 130 such requests (made under the Data Protection Act 1998) last year.</p> <div style="text-align: center;"> <table border="1" style="margin: 10px auto; border-collapse: collapse;"> <caption>No. of Subject Rights Requests</caption> <thead> <tr> <th>Year</th> <th>No. of Requests</th> </tr> </thead> <tbody> <tr><td>2008-09</td><td>15</td></tr> <tr><td>2009-10</td><td>13</td></tr> <tr><td>2010-11</td><td>25</td></tr> <tr><td>2011-12</td><td>28</td></tr> <tr><td>2012-13</td><td>64</td></tr> <tr><td>2013-14</td><td>114</td></tr> <tr><td>2014-15</td><td>208</td></tr> <tr><td>2015-16</td><td>178</td></tr> <tr><td>2016-17</td><td>145</td></tr> <tr><td>2017-18</td><td>130</td></tr> <tr><td>2018-19</td><td>205</td></tr> </tbody> </table> </div>	Year	No. of Requests	2008-09	15	2009-10	13	2010-11	25	2011-12	28	2012-13	64	2013-14	114	2014-15	208	2015-16	178	2016-17	145	2017-18	130	2018-19	205
Year	No. of Requests																								
2008-09	15																								
2009-10	13																								
2010-11	25																								
2011-12	28																								
2012-13	64																								
2013-14	114																								
2014-15	208																								
2015-16	178																								
2016-17	145																								
2017-18	130																								
2018-19	205																								
28.	<p>The types of requests were as follows:</p> <table style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 70%;">Subject Access</td> <td style="text-align: right;">197</td> </tr> <tr> <td>Erasure</td> <td style="text-align: right;">2</td> </tr> <tr> <td>Objection</td> <td style="text-align: right;">2</td> </tr> <tr> <td>Restriction</td> <td style="text-align: right;">2</td> </tr> <tr> <td>Rectification</td> <td style="text-align: right;">2</td> </tr> <tr> <td>Grand Total</td> <td style="text-align: right;">205</td> </tr> </table>	Subject Access	197	Erasure	2	Objection	2	Restriction	2	Rectification	2	Grand Total	205												
Subject Access	197																								
Erasure	2																								
Objection	2																								
Restriction	2																								
Rectification	2																								
Grand Total	205																								

29. 85.4% of the requests were responded within the statutory timescales compared with 95.4% last year.
 This decrease can be attributed to the increase in requests, and the reduction in timescale for compliance (40 calendar days under the DPA 1998 to one calendar month under the GDPR)



30. The Directorate breakdown is as follows:

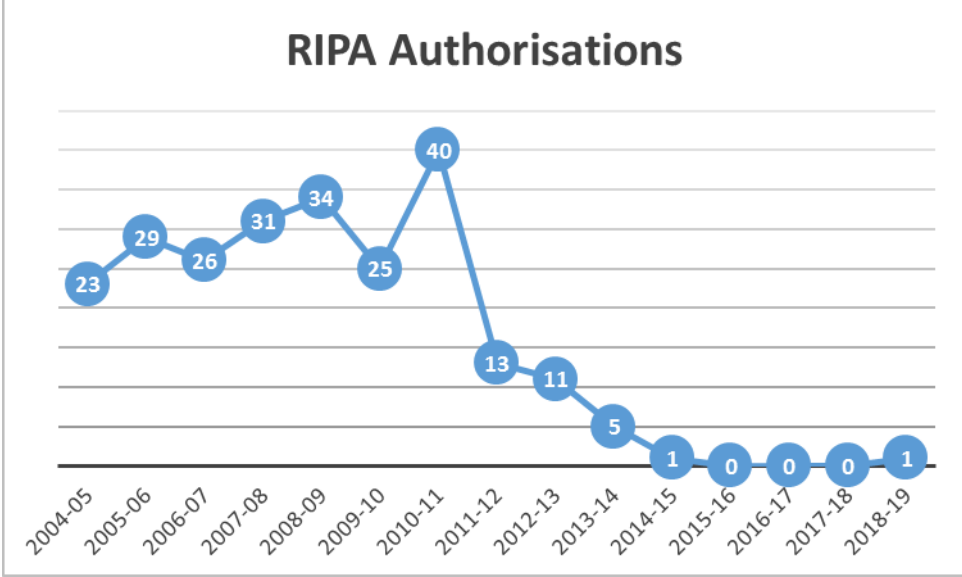
	No. Rec'd	%	Days
Svc Director Children & Families	116	81.0%	29.7
Svc Director Housing, Adults & Communities	26	92.3%	22.0
Svc Director HR and Organisational Development	16	81.3%	27.5
Svc Director Transactions & Universal Services	12	91.7%	17.0
Svc Director Strategic Finance & Commercialisation	9	88.9%	19.4
Svc Director Legal & Governance	4	100.0%	13.0
Svc Director Intelligence, Insight & Communications	3	100.0%	29.0
Svc Director Digital & Business Operations	3	100.0%	31.0
Grand Total	192	95.4%	29.0

31. 13 of the requests were not allocated to a directorate, as it was not clear from the request which service area held the information, and clarification from the requester was not received

32. 5 individuals requested internal reviews regarding decisions made to withhold, partially withhold information requested, or where they were generally unhappy with how their request was handled.

33.	<p>There was 1 occasion where the ICO contacted the Council in light of concerns they had about how a request was handled. The concerns raised were in relation to a delay in processing the SAR.</p>																								
34.	<p>The concerns were investigated by the Corporate Legal team, and their findings relayed to the ICO. The request was a complex matter that involved a great deal of disclosure, however, an updated deadline was given to the ICO, which was met.</p>																								
35.	<p>Sometimes there is a requirement to disclose personal data which might otherwise be in breach of the DPA. Where an exemption from the non-disclosure provisions applies, such disclosure is not in breach of the DPA. Examples of exemptions include crime and taxation and disclosures required by law or made in connection with legal proceedings. Such requests are typically made to the Council by regulatory authorities such as the police, the Department of Work and Pensions and so on as part of their investigations.</p>																								
36.	<p>For the year 2018/19 the Council received 385 requests for data from such third party organisations compared to 448 in the previous year. This is a decrease from last year, and continues a trend in a reduction in such requests. This is likely as a result of an increase in information sharing partnerships, where such disclosures would be governed by a data sharing agreement, without the need to each request to be logged and authorised by the Corporate Legal Team.</p> <div data-bbox="406 987 1374 1563" data-label="Figure"> <table border="1"> <caption>No. of Third Party Requests Received</caption> <thead> <tr> <th>Year</th> <th>Number of Requests</th> </tr> </thead> <tbody> <tr><td>2008-09</td><td>366</td></tr> <tr><td>2009-10</td><td>248</td></tr> <tr><td>2010-11</td><td>275</td></tr> <tr><td>2011-12</td><td>273</td></tr> <tr><td>2012-13</td><td>332</td></tr> <tr><td>2013-14</td><td>349</td></tr> <tr><td>2014-15</td><td>536</td></tr> <tr><td>2015-16</td><td>928</td></tr> <tr><td>2016-17</td><td>636</td></tr> <tr><td>2017-18</td><td>448</td></tr> <tr><td>2018-19</td><td>385</td></tr> </tbody> </table> </div>	Year	Number of Requests	2008-09	366	2009-10	248	2010-11	275	2011-12	273	2012-13	332	2013-14	349	2014-15	536	2015-16	928	2016-17	636	2017-18	448	2018-19	385
Year	Number of Requests																								
2008-09	366																								
2009-10	248																								
2010-11	275																								
2011-12	273																								
2012-13	332																								
2013-14	349																								
2014-15	536																								
2015-16	928																								
2016-17	636																								
2017-18	448																								
2018-19	385																								
37.	<p>In addition to these requests, the CCTV control room (City Watch) and Licensing Team received 1059 and 150 third party requests respectively (the majority of the Licensing requests were for footage from the vehicle Taxi Cameras). These requests are regulated by information sharing agreements, which removes the requirement to have each one authorised by Corporate Legal.</p>																								
38.	<p>The Corporate Legal team also monitor and authorise requests from internal Services to re-use personal information already held by the Council. Such requests are commonly made where personal information is necessary when taking enforcement action, performing a statutory function, or improving the efficiency of Council services.</p>																								
39.	<p>In 2018/19, 47 requests were processed, with CCTV footage being the most common source of information (34% of requests), and Council Tax being the next (21%).</p>																								

	<div data-bbox="395 241 1362 819" data-label="Figure"> <h3 style="text-align: center;">Re-Use of Council Information Requests</h3> <table border="1"> <thead> <tr> <th>Year</th> <th>Number of Requests</th> </tr> </thead> <tbody> <tr> <td>2013-14</td> <td>18</td> </tr> <tr> <td>2014-15</td> <td>97</td> </tr> <tr> <td>2015-16</td> <td>67</td> </tr> <tr> <td>2016-17</td> <td>74</td> </tr> <tr> <td>2017-18</td> <td>73</td> </tr> <tr> <td>2018-19</td> <td>47</td> </tr> </tbody> </table> </div>	Year	Number of Requests	2013-14	18	2014-15	97	2015-16	67	2016-17	74	2017-18	73	2018-19	47
Year	Number of Requests														
2013-14	18														
2014-15	97														
2015-16	67														
2016-17	74														
2017-18	73														
2018-19	47														
<p>DATA SECURITY INCIDENTS</p>															
40.	<p>During 2018-19, 155 data security incidents were reported to the Corporate Legal team. 76% of these were determined to be actual data breaches upon investigation, with the most common cause being data sent electronically to incorrect recipients.</p>														
41.	<p>This year, the Council began recording the “severity” of the incidents reported, determined by a number of factors, including the nature of the information involved, the volume of data, and the possible harm the breach might cause to individuals involved. Any incident receiving a severity rating over 1 is considered to require a full investigation and remediation report.</p> <p>For 2018-19, the average severity of incidents determined to be actual breaches was 0.5</p>														
42.	<p>3 of the data breaches were considered sufficiently serious to be reported to the Information Commissioner’s Office. The details of these are as follows:</p> <ul style="list-style-type: none"> • An email was sent to a distribution list containing a large number of recipients, and the sender failed to use the BCC function. This resulted in the recipients being able to see each other’s email addresses. • Information about an ex-employee was disclosed to their new employer without the individual’s consent. • A report containing details of children open to social services was emailed in error to a client, rather than the relevant manager. 														
43.	<p>In the first two incidents, the ICO considered that no further action was necessary as the Council has put into action adequate and robust remediation plans to ensure that such errors do not reoccur. With regard to the third incident, the Council is still waiting on the outcome of the ICO’s investigation.</p>														
<p>NHS TOOLKIT</p>															
44.	<p>In order to share information with our health partners, the Council has to provide annual assurance as to the standard of its information governance compliance. In the absence of any service information governance lead, the Corporate Legal Team again assumed short term responsibility for collation of the Toolkit evidence this year and, with input from the Caldicott Guardians and relevant service areas, the annual submission was made before the 31st March deadline. The Council is self-assessed at being 100% compliant with the mandatory evidence requirements.</p>														

	RIPA																																
45.	Under RIPA, the Council as a public authority is permitted to carry out directed surveillance, the use of covert human intelligence sources and to obtain communications data if it is both necessary for the purpose of preventing or detecting crime and/or disorder and the proposed form and manner of the activity is proportionate to the alleged offence.																																
46.	<p>There was one authorisation made under RIPA in 2018-19.</p>  <table border="1" data-bbox="400 495 1366 1070"> <caption>RIPA Authorisations</caption> <thead> <tr> <th>Year</th> <th>Number of Authorisations</th> </tr> </thead> <tbody> <tr><td>2004-05</td><td>23</td></tr> <tr><td>2005-06</td><td>29</td></tr> <tr><td>2006-07</td><td>26</td></tr> <tr><td>2007-08</td><td>31</td></tr> <tr><td>2008-09</td><td>34</td></tr> <tr><td>2009-10</td><td>25</td></tr> <tr><td>2010-11</td><td>40</td></tr> <tr><td>2011-12</td><td>13</td></tr> <tr><td>2012-13</td><td>11</td></tr> <tr><td>2013-14</td><td>5</td></tr> <tr><td>2014-15</td><td>1</td></tr> <tr><td>2015-16</td><td>0</td></tr> <tr><td>2016-17</td><td>0</td></tr> <tr><td>2017-18</td><td>0</td></tr> <tr><td>2018-19</td><td>1</td></tr> </tbody> </table>	Year	Number of Authorisations	2004-05	23	2005-06	29	2006-07	26	2007-08	31	2008-09	34	2009-10	25	2010-11	40	2011-12	13	2012-13	11	2013-14	5	2014-15	1	2015-16	0	2016-17	0	2017-18	0	2018-19	1
Year	Number of Authorisations																																
2004-05	23																																
2005-06	29																																
2006-07	26																																
2007-08	31																																
2008-09	34																																
2009-10	25																																
2010-11	40																																
2011-12	13																																
2012-13	11																																
2013-14	5																																
2014-15	1																																
2015-16	0																																
2016-17	0																																
2017-18	0																																
2018-19	1																																
47.	As previously reported, the Protection of Freedoms Act 2012 is now in force, and this makes it a requirement for judicial approval for surveillance activities through application to the Magistrate Courts, therefore imposing a higher threshold for use. As such, there has been a significant decrease in applications made by the Council (and indeed all Councils).																																
48.	Examples of activity authorised in previous years include covert surveillance of a victim’s home to detect acts of criminality, directed surveillance of individuals who were involved in fraudulent activities and a Covert Human Intelligence Source (‘CHIS’) was used to form an online relationship with a suspect to make a test purchase of suspected counterfeit goods.																																
49.	The Council is required to formally appoint a ‘Senior Responsible Officer’ for RIPA. The Service Director; Legal & Governance is the officer who undertakes this role. The Senior Responsible Officer has responsibility for maintaining the central record of authorisations; the integrity of the RIPA process within his authority; compliance with the Act and Codes of Practice; oversight of the reporting errors to the Surveillance Commissioner; engagement with inspectors from the Office of Surveillance Commissioners and implementation of any subsequent action plan.																																
50.	Training for Council officers involved in RIPA processes is regularly undertaken and is delivered by the Corporate Legal Team. Our documentation, procedures and training are also used as ‘best practice’ by a number of other local authorities and we regularly provide training for partner authorities on request.																																
51.	<p>The Office of Surveillance Commissioners carried out an inspection of the Council’s management of covert activities in 2016. In his report, the Chief Surveillance Inspector, the Rt Hon. Lord Judge noted:</p> <p><i>“It is clear that the City Council takes care to address its statutory responsibilities,</i></p>																																

	<i>and that the arrangements for compliance are in experienced, capable hands. From the discussions after the inspection, Sir David [Sir David Clarke, Assistant Surveillance Commissioner] was impressed with the positive approach to their responsibilities taken by Mr Ivory and Miss Horspool"</i>
	GDPR IMPLEMENTATION
52.	The last annual governance report highlighted the additional pressures that the Council will face with the implementation of the GDPR in May 2018. The GDPR came into force on 25 th May 2018, and is supplemented by the Data Protection Act 2018 (DPA18).
53.	The implications of the GDPR are becoming clearer, and the Council has seen an impact in the following areas: <ul style="list-style-type: none"> • An increase in the number of SARs (up 52%, from 130 to 197), due to the removal of the £10 fee that the DPA1998 allowed data controllers to charge for processing such requests. • A drop in compliance, due to the reduction in the statutory timeframe for responding (from 40 calendar days to one month) • An increase in the number of data security incidents reported (up 72%, from 90 to 155). This can be attributed to an increase in awareness in staff to report all such incidents no matter how minor, which is reflected in the low average severity rating. • An increase in the number of Data Protection Impact Assessments conducted by the Council (up 190%, from 48 to 139)
54.	The Corporate Legal team will continue to monitor the above to see if these trends continue as GDPR becomes bed in.
RESOURCE IMPLICATIONS	
<u>Capital/Revenue</u>	
55.	None directly related to this report. The administration of information law within the authority is managed within corporate overheads, but ensuring that the Council performs to an acceptable information governance standard and complies with the new statutory standards imposed by the GDPR and DPA18 places increased pressure on finite and already stretched resources.
<u>Property/Other</u>	
56.	None directly related to the report.
LEGAL IMPLICATIONS	
<u>Statutory power to undertake proposals in the report:</u>	
57.	The statutory obligations relating to information law are detailed in the body of this report.
<u>Other Legal Implications:</u>	
58.	None directly related to this report.
RISK MANAGEMENT IMPLICATIONS	
59.	The potential impact of the decision in terms of finance, service delivery and reputation is considered to be low.

POLICY FRAMEWORK IMPLICATIONS

60.	The information contained in this report is consistent with and not contrary to the Council's policy framework.
-----	---

KEY DECISION?**No****WARDS/COMMUNITIES AFFECTED:**

none

SUPPORTING DOCUMENTATION**Appendices None**

1.

None

Documents In Members' Rooms None

1.

None

Equality Impact Assessment**Do the implications/subject of the report require an Equality and Safety Impact Assessment (ESIA) to be carried out.****No****Data Protection Impact Assessment****Do the implications/subject of the report require a Data Protection Impact Assessment (DPIA) to be carried out.****No****Other Background Documents None****Other Background documents available for inspection at:****Title of Background Paper(s)****Relevant Paragraph of the Access to Information Procedure Rules / Schedule 12A allowing document to be Exempt/Confidential (if applicable)**

1.

None