

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

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

Name or Brief	Review and redesign early help and outreach preventative
Description of	services, to deliver a more focussed locality based model which
Proposal	prevents children becoming looked after by the council.

## **Brief Service Profile (including number of customers)**

There are approximately 63,000 children and young people aged 0-19 living in Southampton. The council and the NHS provide a number of services for children and families, and since 2013 have increasingly worked together to offer more joined up prevention and early help services.

In 2017, a Locality Based 0-19 Early Help and Prevention service was introduced that included a mix of universal services (meaning they are open to everyone who wants to use them), and more targeted, intensive support for children and young people with additional needs, or whose home life makes them vulnerable to poor outcomes. This element supports approximately 950 children.

Services include Sure Start children's centres, health visiting, school nursing, Families Matter and the Family Nurse Partnership. There are also links to other services such as maternity services, pre-schools, schools, colleges, GPs, children's social care, services for children with special educational needs and/or disabilities (SEND), child and adolescent mental health services (CAMHS), and local community and voluntary sector organisations who support these communities.

The service has been successful in offering advice and support to children and families, and we want to extend it to include more targeted support that can address issues such as complex parenting, challenging behaviours, supporting disabilities, welfare advice, mental health advice, domestic abuse and exploitation. The proposal is therefore to extend the model by bringing in more specialist and targeted health and social care, such as Educational Welfare, Inclusion and Targeted teams, Youth Offending and others which can provide early help and outreach preventative services.

These specialist and targeted services are currently available, but have to be accessed separately. By delivering more services locally for families, we aim to

make them part of a community resource that is practical and easy to access. We also want to increase our partnership working with local community and voluntary services.

This will enable us to engage families at an early stage when they are facing challenges or need advice. It will also help to enhance the Families Matter service which focuses on strengthening and turning around families who are experiencing issues. Providing the right help early can stop problems getting worse or avoid issues altogether. Evidence shows that this can deliver better outcomes for children and families as well as saving money in the longer term as it avoids the need for more intensive, long term support. Therefore, it should ultimately reduce the number of children coming into statutory services with escalated needs, requiring the intervention of the council.

### **Summary of Impact and Issues**

The enhanced Locality Based Support Service will extend the current model by bringing in additional health and social care services. It aims to ensure every child gets a good start in life and to help children thrive in healthy and caring family settings, supported by their local communities.

The proposal is to deliver more services in a community based setting where people can access the local help they need as early as possible with the least amount of 'hand offs' or referrals, find their own lasting solutions to the challenges they face, and gain support quickly at point of crisis. Providing more early help and preventative services will:

- reduce the number of children requiring specialist input
- prevent children becoming looked after by the council
- reduce pressure on core teams
- reduce the number of young people excluded from school or put on part time timetables
- increase the percentage of families "turned around" through Families Matter
- reduce the rate of first time entrants into the youth justice system
- keep children and young people in the city, in permanent placements and where possible with their families
- increase opportunities for early intervention in domestic violence and abuse and extend restorative practice.

Delivering this model will require reviewing the services currently available in each locality, as well as the needs of children and families in those areas. We want to make sure that services are targeted where they are needed most, so the redesigned Locality Based Model will be based on local requirements and the services available may be different in each area. This means that some service users may not be able to access all services in their local area, and there may be a reduced offer in parts of the city, but all families will continue to be able to access universal services.

Further analysis will be required to understand impacts on specific groups. This ESIA will be reviewed and updated as further impacts are identified, and will inform the

final decision on this proposal.

## **Potential Positive Impacts**

The proposed service will have a number of positive impacts on children and families in Southampton:

- There will be a clearer offer for children and families and more services will be based locally.
- There will be less reliance on assessment or strict criteria of access and greater focus on targeted need and intervention.
- Children and families will be able to access support and help with any challenges or issues more quickly.
- Services will be more joined up and focused on the key issues that are challenging family stability and resilience.
- There will be closer working relationships across the professional networks.
- There will be greater opportunities to develop links with community and voluntary sector organisations.

Responsible	Phil Bullingham, Service Lead: Safeguarding, Improvement,
Service	Governance and Quality Assurance
Manager	
Date	13 September 2018
Approved by	Hilary Brooks, Service Director: Children, Families & Education
Senior	
Manager	
Date	13 September 2018

Impact Assessment	Details of Impact	Possible Solutions & Mitigating Actions
Age	63,091 children and young people (aged 0-19) live in the city, and this is expected to grow by 4.5% by 2024 to 65,912 (2,821 children and young people).  This proposal's principal direct impacts will be on children, young people and their parents and carers.  Overall it is anticipated that the extension of the Locality Based model will have positive impacts on children and families. Some localities may experience a change in the specialist and targeted services available locally and so	All families will receive the universal offer. Specialist services will also be accessible to those who need them, although in some cases children and families may have to travel out of their local area to access them. Where need is identified families will not be excluded on the grounds of their location, and transport options will be considered to enable those individuals to access services.

Impact	Details of Impact	Possible Solutions &
Assessment		Mitigating Actions
	some children and families may not be able to access all services in their local area. This is because services will be based on local need and targeted where they are needed most. Therefore, there may be a reduced offer in parts of the city.	
Disability	There are some users of this service that have special educational needs and/or disabilities (SEND). The overall impact of extending this model should be positive in terms of its impact.  Some localities may experience a change in the specialist and targeted services available locally and so some children and families may not be able to access all services in their local area. This is because services will be based on local need and targeted where they are needed most. Therefore, there may be a reduced offer in parts of the city.  If specific specialist services are not available in a particular locality, some disabled children or parents may need to travel further to access services that might have previously been available in their locality.	The intention is to increase local availability of more specialist support. Where need is identified families will not be excluded on the grounds of their location, and transport options will be considered to enable those individuals to access services.
Gender Reassignment	No identified impacts.	
Marriage and Civil Partnership	No identified impacts.	
Pregnancy and Maternity	Pregnant woman will be included as part of this model and so may receive more targeted support to help them prepare for parenthood.	
Race	22.3% of the city's population are non-White British, including 14% who are residents from Black or	All families will receive the universal offer. Specialist services will also be

Impact Assessment	Details of Impact	Possible Solutions & Mitigating Actions
Assessment	Minority Ethnic backgrounds.	accessible to those who need them, although in some cases children and families may have to travel out of their local area to access them. Where need is identified families will not be excluded on the grounds of their location, and transport options will be considered to enable those individuals to access services.
Religion or Belief	No identified impacts.	
Sex	No identified impacts.	
Sexual Orientation	No identified impacts.	
Community Safety	No identified impacts.	
Poverty	The majority of looked after children in Southampton originally come from the 20% most deprived communities – 6.3 x higher than the 20% least deprived.	The council will continue to target resources to areas of greatest need.
Health & Wellbeing	If services reduce in some areas, this could have an impact on the socialisation of children and their parents/carers, and their health and wellbeing.	All families will receive the universal offer. Specialist services will also be accessible to those who need them, although in some cases children and families may have to travel out of their local area to access them. Where need is identified families will not be excluded on the grounds of their location, and transport options will be considered to enable those individuals to access services.
Other Significant Impacts	The impacts are likely to be positive for children and families as an enhanced locality offer will promote family stability. Early	

Impact Assessment	Details of Impact	Possible Solutions & Mitigating Actions
	interventions and wrap around support should reduce the number of children needing to be looked after by the Local Authority and manage risk at an early stage.	





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Name or Brief	Review the council run play offer and seek community and
Description of	voluntary sector partners to take over the direct running of the
Proposal	service.
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## **Brief Service Profile (including number of customers)**

The council's Children and Families Service provides a range of services and support to help children and young people get a good start in life.

One of those services is the 'play offer' which runs out of the council's Sure Start Children's Centres and allows children and families to access play sessions in a safe and contained space. These provide support for children and their parents/carers, helps develop community cohesion, provides parent and child socialisation and assists in school readiness.

The council currently sets up, runs and facilitates play sessions in 7 centres across the city and these are staffed by council employees (approximately 20 staff). The sessions interact with an average of 15 children per session and their parents (140 total) and usually run weekly. The current offer extends to an estimated 140 children.

The council recognises the importance of these play sessions to children and their parents/carers. However, it is also important that council resources are targeted where they are needed most, and that we work with other public sector, private sector, voluntary and community organisations to deliver the best value and most joined up services.

The proposal is therefore to explore opportunities for some play services to be run or co-run by local community volunteers and/or parent volunteers rather than council staff. The council and its partners will continue to coordinate and support the running of these groups, though will seek to hand over some facilitation to capable and trained members of the community. Council staff will continue to run some targeted sessions if there are areas where it is not viable to deliver a community led play offer; in that case, these will be targeted to those areas with the greatest need. The council will also support work to develop the availability of play opportunities across the city.

## **Summary of Impact and Issues**

Under this proposal, the council will seek to encourage community groups and individuals to take over the delivery and facilitation of play sessions in Sure Start Centres. There may be some areas where it is not viable to deliver a community led play offer because of the level/complexity of need or because community leaders cannot be sourced. In that case, council staff will continue to run some targeted sessions, in those areas where there are the greatest needs.

There are no planned closures amongst the seven Sure Start Centres which currently deliver a play offer. However, as some services move to a community based delivery model, there will be a reduction in access to professional support during play sessions. Targeted services will still be in place via other routes for those parents/carers who need more support. It is also possible that some areas may see a reduced play offer (in terms of less hours, or potentially some services ceasing) if community leaders cannot be sourced, and council staff need to focus on other areas with a greater level of need.

Further work will be undertaken to engage with local voluntary and community organisations during the process of the consultation, including assessing the level of interest in running or co-running play sessions, and their views will help inform the final decision on this proposal.

### **Potential Positive Impacts**

The delivery of a play offer through communities will strengthen and build partnerships between the council and communities.

Exploring innovative community led delivery models will enable the council to maintain services in parts of the city which potentially could otherwise see a significant reduction of ceasing of the play offer.

Responsible	Phil Bullingham, Service Lead: Safeguarding, Improvement,
Service	Governance and Quality Assurance
Manager	
Date	13 September 2018
Approved by	Hilary Brooks, Service Director: Children, Families & Education
Senior	
Manager	
Date	13 September 2018

Impact Assessment	Details of Impact	Possible Solutions & Mitigating Actions
Age	There are 140 children currently using the Sure Start Children's Centre play offer.	The council will work with individuals and community groups to explore opportunities for community
	63,091 children and young people	groups and individuals to

Impact	Details of Impact	Possible Solutions &
Assessment	( 10 (0)    1 (1) (1)	Mitigating Actions
	(aged 0-19) live in the city, and this is expected to grow by 4.5% by 2024 to 65,912 (2,821 children and young people).	take over delivery and facilitation of play sessions.  The council will continue to target resources to areas of
	The successful development of a community led model would ensure that the play offer is maintained for children in the city. However, it is possible that services could reduce in some areas, which could have a negative impact on some children.	greatest need, if community led delivery is not possible in these areas.  The council will also support work to develop the availability of play opportunities across the city.
Disability	There will be a reduction in access to professional support during play sessions, which could have a greater impact on children with SEND and their parents/carers.	The council will to target resources to areas of greatest need, if community led delivery is not possible in these areas. It will still be possible to access professional support via other routes.
Gender	No identified impacts.	
Reassignment		
Marriage and Civil	No identified impacts.	
Partnership		
Pregnancy and Maternity	It is possible that some services may reduce in some areas, which could have an impact on the socialisation of children and their parents/carers, and have a greater impact on those with more than one younger child.	The council will continue to target resources to areas of greatest need, if community led delivery is not possible in these areas. It will still be possible to access professional support via other routes.
Race	No identified impacts.	
Religion or Belief	No identified impacts.	
Sex	No identified impacts.	
Sexual Orientation	No identified impacts.	
Community Safety	No identified impacts.	

Impact Assessment	Details of Impact	Possible Solutions & Mitigating Actions
Poverty	The majority of looked after children in Southampton originally come from the 20% most deprived communities – 6.3 x higher than the 20% least deprived.	The council will continue to target resources to areas of greatest need, if community led delivery is not possible in these areas. It will still be possible to access professional support via other routes.
Health & Wellbeing	If services reduce in some areas, this could have an impact on the socialisation of children and their parents/carers, and their health and wellbeing.	The council will continue to target resources to areas of greatest need, if community led delivery is not possible in these areas. It will still be possible to access professional support via other routes.
Other Significant Impacts	None identified.	



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Name or Brief	Review the Contact Service which facilitates contact for
Description of	Looked After Children with their birth families, with a view to
Proposal	this being delivered by a partner organisation

## **Brief Service Profile (including number of customers)**

Southampton City Council runs a Contact Service which facilitates contact for our Looked After Children (LAC) with their birth families. The service supervises contact between approximately 300 Looked After Children and their families across varying time frames: some contacts are 3 or 4 times per week and some are once every 6 months. Demand for the service is high due to the numbers of cases being referred.

The current service is costly in terms of staffing, time and physical resource. It employs 16 contact practitioners and requires complex coordination. It is also not flexible enough for our Looked After Children their families, as it only operates in core hours and is not able to meet urgent contacts or to facilitate out of area contact.

The proposal is to review, scope and assess the benefits of the current Contact Service, with a view to it being delivered by a partner organisation. In doing so, the service has the potential to become more flexible, with a 7 day a week service across extended hours. Following review, any changes that are anticipated to have an impact on service users will be subject to further consultation and/or engagement.

## **Summary of Impact and Issues**

A full review will be undertaken to understand the options for delivering the Contact Service through another organisation, and the impacts of doing this. The detailed impacts would not be known until a delivery model is agreed with any organisation that might be interested in taking over this service. Once the review is complete, any changes that are anticipated to have an impact on service users will be subject to further consultation and/or engagement, including an updated Impact Assessment if required.

At this stage, it is anticipated that another provider would be able to provide more flexibility in the locations that the Contact Service is delivered. A more flexible model would reduce logistical pressures for the service and make contact easier for

families. However, this would be subject to the delivery model of the provider and any contract/Service Level Agreements. This would be taken into account in the scoping and review, to ensure that the best balance of outcomes are achieved through the service being contracted out.

### **Potential Positive Impacts**

- Clearer offer for families which are locality based.
- Extended hours offer
- Potential for 7 day service
- Flexible use of buildings
- Quicker response for families
- More cost efficient.
- Extended service could be used to assist in rehabilitation work and so reduce the numbers of LAC and the time they spend in care.

Responsible	Phil Bullingham, Service Lead: Safeguarding, Improvement,
Service Manager	Governance and Quality Assurance
Date	17 September 2018
Approved by Senior	Hilary Brooks, Service Director: Children, Families &
Manager	Education
Date	17 September 2018
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Impact Assessment	Details of Impact	Possible Solutions & Mitigating Actions
Age	Around 300 children are supported by the Contact Service. These children could be impacted by any changes to the service.	Following a review, proposals affecting service users will be subject to further consultation and engagement as appropriate.
Disability	Some children or parents being supported may have disabilities. These individuals could be impacted by any changes to the service. There is a potential positive impact if the service moves location, as this may improve ease of access.	Following a review, proposals affecting service users will be subject to further consultation and engagement as appropriate.
Gender Reassignment	No identified impact.	
Marriage and Civil Partnership	No identified impact.	
Pregnancy and Maternity	No identified impact.	

Impact Assessment	Details of Impact	Possible Solutions & Mitigating Actions
Race	No identified impact.	
Religion or Belief	No identified impact.	
Sex	No identified impact.	
Sexual	No identified impact.	
Orientation		
Community	No identified impact.	
Safety		
Poverty	No identified impact.	
Health &	No identified impact.	
Wellbeing		
Other	None identified.	
Significant		
Impacts		



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Name or Brief
<b>Description of</b>
Proposal

Reduce the funding provided to Compass School Pupil Referral

Unit in line with actual demand

## **Brief Service Profile (including number of customers)**

Compass School is a Pupil Referral Unit (PRU), providing transitional, full time education and support for up to 160 pupils aged 5 - 16 who are not accessing mainstream schools. Permanently excluded pupils are referred directly to Compass School by the council's Vulnerable Pupils Manager. Requests for dual registration places (where pupils are registered at another school as well) are made by mainstream schools via Southampton's 'In Year Fair Access' or 'Primary Heads Inclusion Group'.

Since 2015, the number of PRU places to be funded has been determined by local authorities, taking into account any Alternative Provision (AP) required by their maintained schools and academies. Southampton City Council currently provides funding to Compass School for 160 pupils. In September 2018, there were only 67 pupils on the school roll. Although this number is likely to rise as the academic year progresses, the school has never reached its capacity of 160.

Therefore, the current funding for 160 pupils is not required, both due to lower numbers using the provision than funded places and the fact that the majority of pupils are not receiving full time education and are on reduced timetables.

There has been a national increase in referrals to PRUs. However, the number of pupils who reintegrate to mainstream education in Southampton following a placement at Compass is significantly lower than that of other similar sized local authorities. Therefore, Southampton City Council is working with mainstream schools to reverse this trend and support more pupils to stay in or reintegrate to mainstream placements.

We are therefore proposing to reduce the number of funded places in Compass School from September 2019, to reflect actual numbers and demand.

## **Summary of Impact and Issues**

The proposal is to reduce the number of funded places in Compass School from September 2019, in line with actual pupil numbers.

To achieve this, and keep demand for PRU places low, there will be a greater focus on supporting pupils to stay in mainstream schools and reintegrating those who have been excluded. This will have an impact on mainstream schools and there will be increased expectations for schools to work restoratively in managing pupils with challenging behaviour. Restorative Practice training is being rolled out across the city, with some schools being ambassadors for this. As such, schools will be encouraged and supported to be more creative in delivering personalised curricula to pupils who would benefit from a less traditional style of teaching.

By remaining in mainstream schools rather than being placed in Compass School, some pupils may experience a lesser availability of specialist resources than those which may have been available to them had they been placed in Compass School.

However, ensuring schools are able to address issues of concern sooner rather than later is better for pupils and better value for money. It is preferable to keep pupils in mainstream school if at all possible as permanent exclusion is strongly linked with negative outcomes. There is a wealth of data linking exclusion from school with academic underachievement, offending behaviour, limited ambition, homelessness and mental ill health.

### **Potential Positive Impacts**

- Long term places in Compass School will be made available to those most in need of specialist support.
- There will be an increased focus on preventing exclusion and reintegration into mainstream schooling which will have positive impacts on the outcomes of children and young people.
- The proposal will include the development of preventative outreach programmes (particularly at secondary level).
- Increased numbers of pupils will be supported locally and within the mainstream through flexible provision.
- Specialist resources will be targeted to the most complex cases.

Responsible Service Manager	Derek Wiles, Service Lead: Education
Date	13 September 2018
Approved by Senior Manager	Hilary Brooks, Service Director: Children, Families & Education
Date	13 September 2018

Impact	Details of Impact	Possible Solutions & Mitigating
Assessment		Actions
Age	There are currently 67 pupils aged 5-16 attending Compass School.	Funding is being reduced in line with actual pupil numbers.
	The reduction in funding	Schools are increasingly developing a curriculum which meets the needs of a broader range of students,
	may have an impact on the level of service experienced by children attending the school.	which will enable learners to access provision within mainstream education and reduce the need for places at Compass School.
Disability	100% of pupils in Compass School have special educational needs and/or disabilities (SEND) compared to a national	Frequent periods of change can have a detrimental effect on outcomes for young people with SEND. Therefore, the short-term nature of the placements at
	average of 22%.	Compass may not be beneficial to this cohort. Sustaining placements in mainstream schools through early intervention will see pupils with SEND fully included in mainstream education.
		Having a needs-led, child centred approach to learning within mainstream schools will engage young people with SEND.
		Tailoring the curriculum within mainstream schools to meet the needs of these pupils will have a positive impact on outcomes.
Gender Reassignment	No identified impact.	
Marriage and Civil Partnership	No identified impact.	
Pregnancy and Maternity	No identified impact.	
Race	No identified impact.	
Religion or Belief	No identified impact.	
Sex	No identified impact.	
Sexual Orientation	No identified impact.	Dago 16 of E4

Impact Assessment	Details of Impact	Possible Solutions & Mitigating Actions
Community Safety	No identified impact.	
Poverty	No identified impact.	
Health & Wellbeing	No identified impact.	
Other Significant Impacts	None identified.	





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Name or Brief
<b>Description of</b>
Proposal

Reduce Early Intervention Fund which supports early years and childcare providers to expand or set up new provision

### **Brief Service Profile (including number of customers)**

The Early Intervention Fund supports early years and childcare providers to expand or to set up new provision. In 2017/18, £166,100 was allocated for this purpose, and in 2018/19 £116,000 has been allocated. In 2017-18 1,400 new early education places across the city were secured with the support of the early intervention funding.

Southampton City Council has a statutory duty under the Childcare Act 2006 and subsequent revisions to ensure there are sufficient early education places for 2, 3 and 4 year olds, and sufficient childcare places for working parents. The introduction of the 2 year old offer, the 30 hour offer and tax free childcare, has led to a significant demand for more early education and childcare places. Currently 96% of our 3 and 4 year olds (4,540 children) and 67% of eligible 2 year olds (around 1,400 children) access funded early education. There are 101 registered group early years' providers in the city, across a range of private, voluntary, independent and maintained settings plus around 200 childminders.

Using the childcare sufficiency assessment, which takes into account population figures, housing and business developments and vacancy levels with current providers, providers are encouraged and supported to expand and set up new provision in areas of the city where there are insufficient places. This expansion and development is supported by the Early Intervention Fund.

#### **Summary of Impact and Issues**

The proposal is to reduce the funding allocated to the Early Intervention Fund to £15,000 per annum in 2019/20 and beyond.

Providers will be encouraged to seek funding from other sources. The impact of

the reduction in the funding may be that some early years and childcare providers will find it more challenging to expand or set up new provision. This may in turn impact the number of places available across the city.

There are 15,826 children aged 0-4 in the city, and by 2024 this predicted to fall by 0.2% (30 children). However demand for early education and childcare places has increased in recent years. This may continue, as only 67% of eligible 2 year olds are accessing funded early education, and there are currently insufficient places available in some areas of the city. A reduction in funding available from the council could have an impact on the number of places available in the city if providers are unable to attract funding from other sources to support expansion.

## **Potential Positive Impacts**

Providers will be encouraged to seek funding from other sources, which may lead to sustainable future funding arrangements.

Responsible Service Manager	Derek Wiles, Service Lead: Education
Date	13 September 2018
Approved by Senior Manager	Hilary Brooks, Service Director: Children, Families & Education
Date	13 September 2018

Impact Assessment	Details of Impact	Possible Solutions & Mitigating Actions
Age	49,513 children and young people (aged 0-17) live in the city, and this is expected to grow by 5.5% by 2024 to 52,246.  There are 15,826 children aged 0-4 in the city, and by 2024 this predicted to fall by 0.2% (30	Southampton has always had a mixed model of early year's provision. With most national grants only being available to schools, the council will work with schools to encourage more of them
	children).	to deliver early education. The council
	Demand for early education and childcare places has increased in recent years. A reduction in funding available from the council could have an impact on the number of places available in the city if	has a statutory duty under the Childcare Act 2006 and subsequent revisions to ensure there are sufficient early education places, so if
	providers are unable to attract	insufficient places are

Impact	Details of Impact	Possible Solutions &
Assessment		Mitigating Actions
	funding from other sources to support expansion.	available in future, the council will take appropriate action to address that.
Disability	This proposal may mean that some groups are unable to expand, therefore potentially meaning less places for children with special educational needs and/or disabilities (SEND).  The costs of supporting a child with high-end additional needs in an Early Years setting is not completely covered by the early years funding formula, therefore	The council will work on a case by case basis to identify suitable provision for 2, 3 and 4 year olds with special educational needs and/or disabilities (SEND).
	years funding formula, therefore providers may choose, if they have limited places, to prioritise taking children who do not need dedicated support. This could have a negative impact on SEND children and their families.	
Gender	No identified impact.	
Reassignment		
Marriage and	No identified impact.	
Civil Partnership		
Pregnancy and Maternity	Southampton has a birth rate of 53.2 births per 1,000 females aged 15 to 44 years. This is lower than the England average of 62.5 per 1,000 females.  The number of children aged 0-4 in Southampton is due to fall by 0.2% (30 children) by 2027.  However, demand for early education and childcare places has increased in recent years. A reduction in funding available from the council could have an impact on the number of places available in the city if providers are unable to attract funding from other sources to support expansion.	Southampton has always had a mixed model of early year's provision. With most national grants only being available to schools, the council will work with schools to encourage more of them to deliver early education. The council has a statutory duty under the Childcare Act 2006 and subsequent revisions to ensure there are sufficient early education places, so if insufficient places are available in future, the council will take appropriate action to

Impact Assessment	Details of Impact	Possible Solutions & Mitigating Actions
		address that.
Race	No identified impact.	
Religion or Belief	No identified impact.	
Sex	No identified impact.	
Sexual Orientation	No identified impact.	
Community Safety	No identified impact.	
Poverty	23.4% of children in Southampton live in poverty. Local data shows that only 37% of children living in the 10% most deprived areas of the city who do not attend early years provision reach the expected level in the Early Years Foundation Stage at age 5, compared with 59% who have attended for over 540 hours.  Reducing the early intervention grant may result in fewer new places being made available to under 2s, as it is more costly to staff places for younger children.	The council will signpost providers who are considering expanding to national grants, and work with schools to encourage more schools to deliver early intervention. The council has a statutory duty under the Childcare Act 2006 and subsequent revisions to ensure there are sufficient early education places, so if insufficient places are available in future, the council will take appropriate action to address that.
Health & Wellbeing	If sufficient childcare places are not available, this may have an impact on the health and wellbeing of children and their parents.	The council will signpost providers who are considering expanding to national grants, and work with schools to encourage more schools to deliver early intervention. The council has a statutory duty under the Childcare Act 2006 and subsequent revisions to ensure there are sufficient early education places, so if insufficient places are available in future, the council will take

Impact Assessment	Details of Impact	Possible Solutions & Mitigating Actions
		appropriate action to address that.
Other Significant Impacts	None identified.	





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

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

Name or Brief	Revise the Adult Social Care Charging Policy		
Description of			
Proposal			

## **Brief Service Profile (including number of customers)**

Under the Care Act 2014, the council has discretion whether to charge for services to meet both eligible and non-eligible needs, except where it is required to arrange care and support free of charge.

Southampton City Council has an Adult Social Care Charging Policy which sets out the charges that apply for non-residential care and support. Under this policy, the council charges for some services provided (care and support) where it is permitted to do so under the Care Act 2014 and carries a financial assessment (means test) to determine the amount an individual has to contribute towards the cost of their care and support.

When carrying out a financial assessment, the council follows the rules on the treatment of income and capital laid down in The Care and Support (Charging and Assessment of Resources) Regulations 2014 and in compliance with the Care Act 2014 and the statutory guidance.

The council has, to date, exercised its discretion to not charge at all for some services and for other services has not charged the full amount to cover the actual service being delivered.

In light of the increasing demand for services to meet needs for care and support and the need to deliver savings the council has to look at how we are organised and how we provide services to continue to ensure that we provide the highest quality of services possible. We need to consider how we can make sure that this is sustainable and will meet the needs of local people, now and in the future. We are therefore proposing to increase the income from non-residential care charges and for deferred payment agreements.

The council has considered its duties and responsibilities under the Care Act 2014,

the statutory guidance and regulations prior to putting forward this proposal. The council considers these changes are affordable and reasonably practicable for customers to pay and all charges will be clear and transparent.

In cases of financial hardship the council always has the discretion to waive all or part of any charges on a case by case basis.

The council proposes to make the following changes to its Adult Social Care Charging Policy.

- 1) To introduce a new Arrangement Fee of £250 or £500 (dependent on the level of service) for people whose assets are over the capital threshold, currently £23,250, (and who therefore must pay the full cost of their care) but who nevertheless request Southampton City Council to make the arrangements for their care (as is permitted under the Care Act 2014).
- 2) To take account of higher rate Attendance Allowance and disability benefits (Personal Independence Payment and the care component of Disability Living Allowance) when assessing for financial contributions. This amounts to a maximum increase of £28.00 per week for those on higher rate disability related benefits.
- 3) Clarify explicitly that assessed charges start from the date the service commences.
- 4) Remove the exemption from charging for customers receiving social care support who were previously supported by the Locally Based Hospital Unit (LBHU) prior to its closure in 2011.
- 5) To increase charges for universal deferred payment scheme loans, which are permissible under the Care Act 2014. This is a service where the council provides a loan to the customer secured by a legal charge on their property which is recovered either when the property is sold by the customer or the customer dies and following sale, the loan is recovered.

## **Summary of Impact and Issues**

These proposals impact on existing social care clients and we will be undertaking a separate and more detailed consultation in addition to the overarching budget consultation so we can make sure all our clients and their families have the opportunity to engage fully.

Of our social care clients, 100% fall under the definition of 'Disability' and are identified under the Protected Characteristics in the Equalities Act 2010. The majority of customers are older people. In respect of gender, proportionately more customers are female, however, all genders would be impacted by the increased costs. People from Black and Minority Ethnic backgrounds are less likely (when compared to the population as a whole) to be customers, however, would also be impacted by the increased costs.

Evidence shows that disabled people, older people and people from minority ethnic backgrounds have proportionately lower levels of income and could therefore experience a greater level of financial impact.

The nature of the impact of the proposals will vary according to the specific proposal and will be mitigated by offsetting Disability Related Expenditure (DRE) against the assessed client contribution, where appropriate.

- 1) Arrangement Fee: The proposal to introduce an Arrangement Fee of £250 or £500 (dependent on the level of service) for people whose assets are over the capital threshold (currently £23,250 or more). The different charge rates will apply as follows:
  - £250: Where the council helps a client to find and arrange their care, but the client then enters into a private arrangement with the organisation providing that care or;
  - £500: Where the council helps a client to find and arrange their care at home and the council has ongoing responsibilities for the arrangement and management of the contracts with the care provide on their behalf.

This is anticipated to have only a minimal impact and is considered to be reasonably practicable for these customers to pay. All of these customers will have more that the higher capital threshold. The risk will be that their assets could deplete at a faster rate and reduce them to below the capital threshold. This may result in them being eligible for all or some of their care and support needs being met by the council at a potentially earlier time. However, a charge of £250/£500 will be a one off charge for arranging the particular provision for the needs for care and support at that time. A further charge would be levied on each occasion the customer asked the council to arrange a provision of services. A fee of £250/£500 is considered affordable and equates to the average actual cost to the council for arranging this service and will be payable each occasion that a customer makes a request to the council.

2) Take account of higher rate Attendance Allowance and disability benefits: The proposal to include higher rate Attendance Allowance and disability, as some other local authorities do, is anticipated to have a significant financial impact on some people. Up to 746 people may be impacted by the proposal to take into account the higher rate of Attendance Allowance or disability benefits. The higher rates of Attendance Allowance and disability benefits were taken into account as part of the financial assessment prior to 2009. The inclusion of Attendance Allowance in financial assessments will impact people aged 60 and over. Disability benefits will relate to adults aged 18 to 64. The mobility element of disability benefits will continue to be disregarded. Higher rate attendance allowance is paid at £85.60 in 2018, compared to £57.30 lower rate.

The potential financial impact on customers is that they will be assessed at having to contribute up to £28 per week more towards the cost of their care

and support.

- 3) Charges start from the date the service commences: This proposal will enable the council to align charges and payments with services provided, from the point at which they start being provided. This will mean that recipients of support will have to commence payment earlier than previously, and therefore pay more overall. Intermediate care including reablement must be provided free of charge for up to 6 weeks.
- 4) Remove the LBHU exemption: People who were previously supported by the Locally Based Hospital Unit (LBHU) prior to its closure in 2011 are current exempt from non-residential care charges. The proposal to remove this exemption will impact a total of 24 customers who are living with a learning disability and may have to pay for or contribute towards the cost of their adult social care.
- 5) **Deferred payment scheme loans:** A Universal Deferred Payment Scheme (UDPS) is a loan given to a client who is receiving residential care and coves charge payable by the customer to the costs of their care and support. The client will continue to pay their contribution towards their care for example a top up payment and the council will pay for the rest of the fees, having taken a legal charge with the customer's agreement on their property as security as set out in the Legal Agreement. The council supports an average of 15 customers a year through the UDPS scheme.

There are a number of circumstances where the customer will need to pay back the amount to the council. These are set out in the legal agreement the customer signs In most circumstances where repayment is triggered the customer can either choose to:

- sell their property within an agreed period and reimburse the council, or:
- the council will be reimbursed from the estate of the customer once they have died.

The Care Act 2014 gave powers to councils to enter into deferred payment agreements (DPA) to prevent people from being forced to sell their homes in their lifetime to meet the costs of their care. Local Authorities can offer a DPA to an individual who meets the criteria set out in the Care Act 2014.

The UDPS is intended to be run on a cost-neutral basis with Local Authorities being able to recoup the costs associated with deferring the fees by charging interest and by recouping administration charges. Administration charges and interest can be added onto the total amount charged or customers can choose to pay for them separately.

The proposal is to increase the charges that council makes to cover the cost of the service. Southampton City Council currently charges a one of administration fee of £250, and no ongoing administration charges after this initial fee. The council also charges interest at 4% above base rate, but only

after 56 days after the issue of a final invoice. These charges are much lower than the actual costs of administering the scheme. Other councils have implemented additional charges to cover the costs of the scheme, for example, Hampshire County Council charge interest throughout the duration of the loan charged at 1.85% per annum.

Local authorities must set their administration charge at a reasonable level and this must not be greater than the actual costs incurred by the local authority. Therefore Southampton City Council is proposing to increase charges to cover the administrative costs of the UDPS including:

- Increasing the one off set-up charge
- Introducing an annual Administration Fee
- Charging interest throughout the duration of the loan, at the rates set by the Office of Budgetary Responsibility.

This would affect new UDPS arrangements only and would not affect people with existing loans. The exact charges proposed for 2019/20 will be included in the draft Adult Social Care Charging Policy for consultation.

The above proposals will be extensively consulted on and this specific consultation will run in tandem with the wider budget consultation process. All customers and families will be given the opportunity to engage fully in the consultation.

As shown above, the increases in charges do impact vulnerable groups. However, customers are means tested and only those considered to have the financial means will be expected to pay the increased charge.

It should be noted that these changes bring the council's charging policy more fully in line with the national regulations and statutory guidance and no customer will be left with less than the minimum amount stipulated by these.

#### **Potential Positive Impacts**

For all groups, these changes help to ensure that the council can continue to help as many people with care and support needs as possible within the limited resources available. To this extent there should be a positive impact overall, as resources will be distributed more equitably.

Responsible	Lee Fermandel, Interim Service Manager: Safeguarding.		
Service Manager			
	Vanessa Shahani, Service Lead: Business Services.		
Date	10 September 2018		
Approved by	Paul Juan, Service Director: Adults, Housing & Communities.		
Senior Manager			
Date	11 September 2018		

Impact Assessment	Details of Impact	Possible Solutions &
Assessment Age  Disability	Older people are disproportionately highly represented in the adult social care customer group and therefore older people will be impacted by these proposals.  Within the customer group it is the older customers that are more likely to have the type of capital assets that these proposals take in to account.  Within the client group itself the proposed changes will apply equally regardless of age, and these proposals could therefore impact customers of any age.  Older people impacted are likely to experience a negative financial impact as a result of the proposals.  Up to 746 people may be impacted by the proposal to take into account the higher rate of Attendance Allowance or disability benefits.  Other proposals are likely to have impacts on people with disabilities which contribute to their care requirements. Some people with disabilities may be adversely impacted by more than one of the charging proposals meaning that their assessed charge will increase.	Mitigating Actions  A full review of all charges, and the impacts of any proposals will be undertaken.  All representations made during the consultation will be taken into account before any decision is made and this will in particular consider any new identified impacts and ow these could be mitigated.  Customers and their families will be provided with advice and information including details of local advice agencies which will provide financial advice where relevant.  A full review of all the proposed charges, and the impacts of any proposals will be undertaken after taking account of all representations made during the consultation process.  Potentially affected customers will have the opportunity to consider the proposals as part of a formal consultation in 2019.  Taking into account Disability Related Expenditure (DRE) will help mitigate any impact on people who are required to contribute more to the cost
Gender	Unknown	of their care and support.  A full review of all the
Gender	Unknown	A full review of all the

Impact	Details of Impact	Possible Solutions &
Assessment		Mitigating Actions
Reassignment		proposed charges, and the
Marriage and	Unknown	impacts of any proposals
Civil		will be undertaken after
Partnership		taking account of all
Pregnancy and	Unknown	representations made
Maternity		during the consultation
Race	Unknown	process.
Religion or	Unknown	
Belief		The council will comply with
Sex	Unknown	its duties under the Care Act 2014 which confirms
Sexual	Unknown	that any change should be
Orientation		reasonable and affordable.
Community	Unknown	The Council will use its
Safety		discretion to waive all or
Poverty	There could potentially be an	part of any charge if is likely
	impact as increasing charges and	to cause undue hardship on
	making new changes have an	a case by case basis.
	adverse financial affect.	
Health &	Unknown	
Wellbeing		
Other	Unknown	
Significant		
Impacts		



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

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

Name or Brief	Closure of two council owned residential care homes for older	
Description of	people, enabling the council to focus on the development of	
Proposal	housing with care and community-based services, with the	
-	local home care market providing residential care where this is	
	needed	

## **Brief Service Profile (including number of customers)**

Southampton City Council runs two residential homes, Holcroft House and Glen Lee. Holcroft House is a 34 bedded unit and Glen Lee is a 33 bedded unit. Both are Care Quality Commission (CQC) registered residential units providing short and long term care for adults living with a dementia. Both homes are rated as "good" by CQC. In Glen Lee, the accommodation is provided over two floors accessed by a passenger lift. In Holcroft House, accommodation is provided on one floor.

There are currently 36 residential homes that are CQC registered with dementia care within the city (including the two homes run by the council). There is an over provision of residential homes within the city, with 70 vacancies for residential care homes across the city in October 2018.

Although demand for Adult Social Care is increasing, the demand for residential care has decreased as more people are supported to live independently in their own homes. National and local research has found that older people would prefer to continue living at home for as long as possible. Research also tells us that the demand for residential care is likely to continue to decrease as alternatives such as housing with care become the preferred option.

The local home care market is better placed to provide care and support where residential care is needed, leaving the council to focus on the development of housing with care and community-based services. The proposal is therefore to close both council owned residential care units: Glen Lee and Holcroft House.

Thorough, person-centred assessments will be undertaken of each individual resident of the homes to determine their needs and how they can best be met in future before any final decisions are taken. These will take into account the views

and preferences of the person as well as their families, carers and where appropriate their independent advocates. This assessment will also measure the impact of the phased closure on individual residents and will seek support from other professionals and agencies to minimise impact, particularly to their health and well-being. The proposal is that, subject to consultation and careful consideration of all representations before any final decision is made, the homes would be closed over the period of a year. The proposed closure will be carefully managed and will include an individual transition plan for all residents. Care staff will be supported throughout to ensure a safe and excellent quality of care is provided throughout the closure process.

Prior to any decisions being made extensive consultation will take place to minimise the impact and take into account the views of users, relatives and other stakeholders. Residents, relatives, carers and stakeholders will be involved in ongoing discussions, assessment processes and planning for the future. Strict regard will be had to both the framework provided by the law and any statutory and good practice guidance. The needs and welfare of residents and families are paramount when considering transfer to alternative provision.

### Summary of Impact and Issues

The impact of any decision to close the two care homes will be a direct impact on those currently using these facilities. Current residents will have their needs reviewed and will be supported to move to alternative provision which could be a new care home.

Financially, no resident will be worse off as a result of this proposal as the council will freeze the rate so that the new care home fee will not be higher than it was prior to the move.

The closure of the current provision has the potential to affect services provided to adults with care and support needs including:

- Adults with dementia
- Adults with physical disabilities
- Adults with sensory support needs
- Short term provision
- Family and Carers
- Local residents

Potential impacts identified so far include:

• Some residents that are currently in the residential homes that are proposed to be closed may find it upsetting to move as they may have been living in the area and care home for a while. If the proposals go ahead following the consultation period, a full assessment will be carried out for each resident before they move. These assessments will be based on good practice guidelines on closing care homes and settling people into new accommodation. Residents will also have access to independent advocacy support.

- The proposed closures, if approved, will require the council to support some
  existing residents to move to a different care home whilst we will work
  sensitively to minimise the impact their vulnerability may mean they find it a
  challenging experience. It will mean a change of environment and staff team
  and it will take time to manage the transition.
- Residents' concerns and levels of anxiety could impact their emotional and physical wellbeing particularly just before and move or immediately afterwards. Relatives of residents may also have concerns relating to finding suitable alternate care and support which could impact their health and wellbeing.

Carers and residents will be involved in on-going discussions, assessment processes and planning for the future.

If the proposal is approved the council will review in conjunction with the NHS (if appropriate) all resident's needs individually.

Although there is a presumption that all individuals have mental capacity until there is evidence to the contrary it is likely that some of the residents may lack the capacity to make decisions or complex decisions about their residence and their care and support. If after the mental capacity assessment there is evidence that the individual lacks capacity to make relevant decisions the council will need to arrange a best interest decision meeting. In some cases an application to the Court of Protection may be required. The council have a duty to provide independent advocacy services to anyone who would have difficulty in engaging with the consultation process and thereafter if the proposal to close both homes is approved the Council will provide advocacy services to residents and relatives where necessary, particularly during any review of the individual's needs for care and support and during care planning to an alternative provider.

Each individuals' rights under relevant legislation including the Care Act 2014, Mental Capacity Act 2005, Equality Act 2010, and Human Rights Act 1998 would be ensured and best practice and Care Quality Commission Managing Care Home Closures Guidance (2016) will be followed.

#### **Potential Positive Impacts**

In the longer term there is evidence that supporting people living with a dementia to live independently in their own homes drawing where appropriate on the support of others in their community leads to the best outcomes for those people.

Re-providing residential care and support in homes run by charities and the private sector is more cost effective, supporting a more sustainable social care system locally, ensuring that the needs of people in Southampton can continue to be met in full. The proposal for change includes the development of more housing with care schemes at different sites as an alternative to residential care. This is a positive impact on people who live in Southampton, as this will enable people to live independently within a scheme in a self-contained flat which will have the benefit of an on-site care team.

Responsible Service Manager	Sharon Stewart, Service Lead: Adult Social Care
Date	5 September 2018
Approved by Senior Manager	Paul Juan, Service Director: Adults, Housing & Communities
Date	6 September 2018

Impact Assessment	Details of Impact	Possible Solutions & Mitigating Actions
Age	The greatest impact of the proposal is likely to be on those older residents who have been using Glen Lee and Holcroft services for many years and for whom any change in provision will be difficult.  All of the residents are over 65 years.	Needs assessments and reviews will take place for all residents prior to any changes taking place. Through this process information on alternatives will be made available. A gradual approach will be taken to support those who will be most affected.
	There is potential for decline in residents' emotional and physical health during and immediately after any move following closure of a care home.	Individual transition plans will be produced and updated. This plan will include analysing the impact and where necessary other professionals and agencies will be called upon to support the individual to minimise any impact.  Advocacy services are in place to help support the individual's and their families throughout the proposed process. Any proposed move will be considered carefully taking into account the persons best interest's and their and their families' wishes and feelings. Any move will need to meet the individuals assessed eligible needs for care and support are met.

Impact Assessment	Details of Impact	Possible Solutions & Mitigating Actions
Assessment		A project management team will be set up who will prepare a Closure Plan which will be reviewed regularly and will be followed.  There is adequate residential and non-residential provision within the city boundary.
Disability	All residents have a cognitive impairment and a significant number also have a physical impairment.  The proposal may have either a positive or negative impact depending on the individual and the extent to which they prefer current models of service.  Those with physical disabilities may experience a larger impact due to some of the alternative options not having the equipment to be able to support appropriately and being able to accommodate in private sector, however, this will be no different to our internal homes.	As above, any proposed move will be considered carefully taking into account the persons best interest's and their and their and families' wishes and feelings. Any move will need to meet the individuals assessed eligible needs for care and support are met.  A project management team will be set up who will prepare a Closure Plan which will be reviewed regularly and will be followed.  There is adequate residential and non-residential provision within the city boundary.  Residents and their carers will be supported to identify the most appropriate respite option which meets their physical needs.
Gender Reassignment	No identified impact.	Any potential risks can be mitigated by support to access alternative, appropriate services such as peer support and by working with other agencies to ensure all purchased and community services are

Impact	Details of Impact	Possible Solutions &
Assessment		Mitigating Actions
		accessible to all
		communities.
Marriage and	No identified impact.	No married or civil
Civil		partnership couples within
Partnership		our homes currently,
_		however, if this changed
		then they would be
		accommodated together.
Pregnancy and	No identified impact.	
Maternity		
Race	Residents and carers will be able	All residents will have an
	to choose, to some extent, from a	assessment prior to any
	range of alternative provision and	service change which will
	arrange services that are culturally	include cultural issues.
	appropriate.	
Religion or	Residents and carers will be able	All residents will have an
Belief	to choose, to some extent, from a	assessment prior to any
	range of alternative provision and	service change which will
	arrange services that are	address matters of religion
	appropriate to their individual need	and belief.
	including religion and belief.	and bollon.
Sex	Residents and carers will be able	All residents will have an
Jex		
	to choose, to some extent, from a	assessment prior to any
	range of alternative provision and	service change which will
	arrange services that are tailored	address matters relating to
	to their needs including single	sex.
	gender services.	
Sexual	No identified impact.	
Orientation	No. 1de el Conditione el	
Community Safety	No identified impact.	
Poverty	No identified impact.	
Health &	Residents' concerns and levels of	Needs assessments and
Wellbeing	anxiety could impact their	reviews will take place for
	emotional and physical wellbeing	all residents prior to any
	particularly just before and move or	changes taking place.
	immediately afterwards. Relatives	Through this process
	of residents may also have	information on alternatives
	_	
	concerns relating to finding suitable	will be made available.
	alternate care and support which	
	could impact their health and	
	wellbeing.	

Impact Assessment	Details of Impact	Possible Solutions & Mitigating Actions
Other Significant Impacts	None identified.	





# **Equality and Safety Impact Assessment SHIL3**

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

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

Name or Brief	Reclassify some council properties currently only		
Description of Proposal	available to those aged 60 and over, making them		
	available to people over 50		

#### **Brief Service Profile (including number of customers)**

There is a significant demand for affordable social rented homes in Southampton and there are currently 8,000 people on the Housing Register.

The council has to make best use of the resources available to it in order to be able to house the maximum number of people from the Housing Register. This means there are strict rules about the type of property which applicants can apply for. In deciding on the type of property and degree of priority required, the council has to bear in mind the type of housing available and the demand for that housing.

However, there are a number of properties that are currently 'hard to let'. These are typically properties which are restricted to residents aged 60+, which are on the first floor or above in walk up blocks (without lifts). This proposal is to reclassify some properties which are currently restricted to residents aged 60+ (60+ properties) to make them available to those to aged 50+ or 55+.

The table below shows the current breakdown of 60+ properties:

Ground Floor	1420
First Floor	1446
Second Floor	207
Third Floor	160
Total	3233

There are currently 1,118 over 60+ people on the waiting list for accommodation. However, due to health and/or mobility issues a significant proportion do not bid for properties on the 1<sup>st</sup> floor and above. Despite direct marketing of properties of 60+ flats to eligible applicants, there has been low demand for some properties, with some remaining unlet for significant periods of time.

There are costs associated with keeping empty properties both in terms of lost rent and payment of Council Tax, which becomes due on properties which are void for a period longer than one month. In 2017/18, over 680 days were lost on hard to let properties, at a cost of £66,764. This was typically on properties on the first floor and above and this does not include blocks with lifts.

Alongside low demand for some types of properties amongst people 60+, there is a high level of demand from 50+ applicants. In October 2017, there were 1021 applicants waiting for 50+ housing on the housing register. In addition, applicants for 50+ housing wait longer than those waiting for 60+ housing:

Rehoused in last 5 years	Average Waiting Time Years	No of Applications
Over 50s Floating	4	372
Over 60s Floating	1	178
Over 60s Supported Complex	1	115

The blocks currently identified as a potential option for reclassification are:

Malin Close	Mansel Court
Rockall Close	<ul> <li>Jessamine Road</li> </ul>
Lundy Close	<ul> <li>Edward Road</li> </ul>
Curzon Court	Avignton Court
Sarina Court	Basset Green Court
Manston Court	Bowman Court
Maybush Court	Meon Court
Vellan Court	Dewsbury Court

## Summary of Impact and Issues

Penrith Court

Widening the classification and increasing the numbers of people who can apply will potentially increase the likelihood of finding a suitable and sustainable match for hard to let properties. This should decrease void times and improve waiting times for 50+ applicants in housing need.

Reclassification has been successfully implemented at Orphen Road. The 1<sup>st</sup> floor flats are now 55+. This has resulted in a decrease in void turnaround times and there have been no complaints from existing residents.

Our proposal is to review and potentially reclassify accommodation in phases, block by block. As part of this, further work would be required to review the sign up process and the proposed age reclassification against each address, either 55+ or 50+. Some properties may be more suitable for reclassification than others, such as properties that have a greater number of first floor flats that are void.

We would undertake detailed consultation with affected tenants as proposals are developed, and before any decisions are taken about each block. As part of that process we would also review and consider what measures we might need to take to

address equality impacts or other impacts for individuals and properties.

If a tenant applies for the right to buy in one of the flats that have been reclassified then there will be a loss of rental income to the housing revenue account, and there is the potential that the property could be sold on at a later date to someone who is not over 50 years of age. To date our experience of where reclassification has taken place is that no one has applied for the right to buy. Any sale will mean that the property is a leasehold flat and the occupant will have to pay their share for repairs and for any major work to the block.

# **Potential Positive Impacts**

- Improved void turnaround times.
- Increase in rental income.
- Improved rehousing for those aged 50-60 who are on the housing register.

Responsible	Steve Smith, Service Lead: Council Housing &
Service Manager	Neighbourhoods.
Date	5 September 2018
	·
Approved by	Paul Juan, Service Director: Adults, Housing & Communities.
Senior Manager	
Date	5 September 2018

Impact Assessment	Details of Impact	Possible Solutions & Mitigating Actions
Age	Reclassification would introduce people aged 50-60 in to what is currently designated over 60s accommodation.  This would have a positive impact on residents in this age bracket currently on the Housing Register, by making more properties available to them.  This would only apply to properties that are currently vacant, and therefore not have an impact on people over 60 on the Housing Register.  Some tenants aged 60+ may have concerns about the reclassification of neighbouring properties, as it would mean that the block has a wider mix of tenants including	There will be clear signage including rights and responsibilities of tenants. We would undertake detailed consultation with affected tenants as proposals are developed, and before any decisions are taken about each block. As part of that process we would also review and consider what measures we might need to take to address equality impacts or other impacts for individuals and properties.

Impact	Details of Impact	Possible Solutions &
Assessment	•	Mitigating Actions
	those who are 50+ rather than 60+,	
	as well as potentially younger	
	partners and families.	
Disability	This proposal will seek to reclassify	
	harder to let properties, such as	
	those on 1 <sup>st</sup> floor or above. People	
	with disabilities, in particular	
	disabilities which affect their	
	mobility, are more likely to require	
	ground floor or specialist properties	
	and would therefore not be	
	impacted by this proposal.	
Gender	No identified impact.	
Reassignment	No identified impact	
Marriage and Civil	No identified impact.	
Partnership		
Pregnancy and	No identified impact.	
Maternity	No identified impact.	
Race	No identified impact.	
Religion or	No identified impact.	
Belief		
Sex	No identified impact.	
Sexual	No identified impact.	
Orientation		
Community	No identified impact.	
Safety	N. C. C. C.	
Poverty	No identified impact.	Tanada illandia ata
Health &	Some tenants aged 60+ may have	Tenants will continue to
Wellbeing	concerns about the reclassification	have access to wellbeing
	of neighbouring properties, as it	and prevention staff and
	would mean that the block has a	Local Housing Management staff. There will be clear
	wider mix of tenants including	signage including rights and
	those who are 50+ rather than 60+, as well as potentially younger	responsibilities of tenants.
	partners and families.	We would undertake
	partiters and farillies.	detailed consultation with
		affected tenants as
		proposals are developed,
		and before any decisions
		are taken about each block.
		As part of that process we
		would also review and
		consider what measures we
		might need to take to
		address equality impacts or
		other impacts for individuals
		consider what measures we might need to take to address equality impacts or

Impact Assessment	Details of Impact	Possible Solutions & Mitigating Actions
		and properties.
Other	None identified.	
Significant		
Impacts		





# **Equality and Safety Impact Assessment SHIL4**

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

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

Name or Brief
<b>Description of</b>
Proposal

Review service charges to tenants in council owned properties, increasing the existing charges and introducing three new ones.

## **Brief Service Profile (including number of customers)**

Southampton City Council is a major landlord with around 18,000 council properties. Of these properties, over 16,000 are rented by tenants and the rest are occupied by leaseholders. As a landlord, the council provides a range of services to tenants and leaseholders. These include block cleaning, concierge, heating, grounds and garden maintenance and other services. The council has legal powers to charge for these additional services so long as the charges are clear and transparent and represent the actual cost of the service.

Rents are generally taken to include all charges associated with the occupation of a property, such as maintenance and general housing management services. Service charges usually reflect additional services which may not be provided to every tenant, or which may be connected with communal facilities rather than being particular to the occupation of the dwelling.

There are different processes for setting the charges for tenants and leaseholders, and this proposal relates to the charges that tenants pay. The proposal is to increase current service charges to tenants, and to introduce three new service charges to tenants as detailed in the table below.

The council's current charges are lower than the actual costs and in some cases the council has not previously charged for services, but has been providing a service to tenants. The council needs to have a viable and sustainable Housing Revenue Account (HRA) that enables the council to deliver effective services, invest in its properties to ensure homes are of a modern standard, and to provide new social housing to rent. If the council does not recover its actual costs for these services it has a detrimental effect on the HRA overall.

The table below reflects different charges for tenants of walk-up blocks and tower

blocks. The charges reflect different levels of services and costs. The management and maintenance of tower blocks is significantly higher than walk-up blocks, which is reflected in the higher service charges. The tower blocks include a concierge charge which has been reviewed and increased, and this covers some of the charges listed separately for walk-up blocks such as cleaning. We are proposing that increases to the concierge charge will be phased to mitigate the impact in year 1.

Neighbourhood Wardens were not previously included in walk-up block service charges despite these tenants benefiting from these services. We are proposing phasing the increase for this service for tenants in walk up blocks to mitigate the impact in year 1.

Service		Walk-up bloc	k		Tower bloc	k
(all charges are weekly)	Current Charge	Proposed Charge 2019/20	Proposed Charge 2020/21	Current Charge	Proposed Charge 2019/20	Proposed Charge 2020/21
Existing Charge						
Cleaning	65p	72p	72p	-	-	-
Concierge	-	-	-	£1.24	£2.18	£2.73
Neighbour- hood Wardens	-	54p	£1.45	£5.12	£5.12	£5.12
TV Aerial (communal)	43p	43p	43p	43p	43p	43p
New Service Charge						
Test/Repair Emergency Lighting	-	27p	27p	-	27р	27p
Garden/ Grounds Maintenance	-	22p	22p	-	22p	22p
Door Entry	-	22p	22p	-	-	-
TOTAL	£1.08	£2.40	£3.31	£6.79	£8.22	£8.77

## **Summary of Impact and Issues**

This proposal will increase the costs to tenants living in the council's walk-up blocks and tower blocks across the city.

Approximately 10,000 tenants (out of a total of approximately 16,000 total) are currently in receipt of Housing Benefit or Universal Credit, and therefore all or some of their rent and services charges are met by benefit payments.

Some service charges are eligible to be paid by Housing Benefit/Universal Credit (HB/UC), so tenants on these benefits are likely to have some or all of the costs included as part of their benefit payments. Those not on either benefit, or where service charges are not considered eligible, will have to pay some or all of the additional charges to the council.

Tenants of walk-up blocks will see a proportionately greater increase in service charges than tenants of tower blocks. However, the total amount remains considerably lower for tenants in walk-up blocks. Neighbourhood Wardens were not previously included in walk-up block service charges despite these tenants benefiting from these services. We are proposing phasing the increase for this service for tenants in walk up blocks to mitigate the impact in year 1. The management and maintenance of tower blocks is significantly higher than walk-up blocks, which is reflected in the higher service charges.

The charges proposed in the table above are fixed rates that will be payable by all tenants regardless of any protected characteristics. Southampton City Council has not identified any specific impacts related to protected characteristics, either negative or positive, beyond the overall impacts on all tenants of potential increased living costs.

The council intends to set up a discretionary relief fund if these proposals are approved to help those in most need to pay for all or part of the additional charges. The proposal is that the discretionary fund will meet some of all of the additional changes for up to 6 months for those most in need. This fund will be managed through the Discretionary Housing Payments process that exists already. This fund will assist the people and families in most need, and will enable them to transition to being able to pay for the additional charges, if the charges are not covered by Housing Benefit/Universal Credit or they are not entitled to these benefits.

As this proposal would have a direct impact on existing tenants, a separate and more detailed S.105 consultation will be carried out in addition to the overarching budget consultation to ensure all tenants have an opportunity to engage and provide feedback before a final decision is taken.

## **Potential Positive Impacts**

The council's current charges are lower than the actual costs of providing the service, and in some cases the council has not previously made a charge but has been providing a service to tenants. The council needs to have a viable and sustainable Housing Revenue Account (HRA) that enables the council to deliver effective services, invest in its properties to ensure homes are of a modern standard and to provide new social housing to rent. If the council does not recover its actual charges for these services it has a detrimental effect on the HRA overall.

Responsible	Steve Smith
Service Manager	Service Lead- Council Housing & Neighbourhoods
Date	27 September 2018
Approved by	Paul Juan
Senior Manager	Service Director – Adults, Housing & Communities
Date	27 September 2018
	·

Impact Assessment	Details of Impact	Possible Solutions & Mitigating Actions	
Age	No identified impacts.		
Disability	No identified impacts.		
Gender Reassignment	No identified impacts.		
Marriage and Civil	No identified impacts.		
Partnership Pregnancy and Maternity	No identified impacts.		
Race	No identified impacts.		
Religion or Belief	No identified impacts.		
Sex	No identified impacts.		
Sexual Orientation	No identified impacts.		
Community Safety	No identified impacts.		
Poverty	Council tenants are more likely to be on lower incomes and eligible for qualifying benefits than other groups.  Approximately 10,000 tenants are currently in receipt of Housing Benefit/Universal Credit.  Those on lower incomes are more likely to experience a proportionally higher impacts of a service charge increase than others.	Tenants will be given information as to how to gain advice from local agencies such as the council's Homeless Prevention Team, Citizen Advice, Money Advice Service, StepChange, Money Matters, Age UK, and local relevant charitable/voluntary sector organisations.  Some service charges may be covered by Housing Benefit/Universal Credit.  The council intends to set up a discretionary relief fund if these proposals are approved to help those in most need to pay for all or part of the additional charges.	

Impact Assessment	Details of Impact	Possible Solutions &
Health & Wellbeing	Tenants may experience increased financial strain due to increased living costs, which may have negative impacts on health and wellbeing.	Tenants will be given information as to how to gain advice from local agencies such as the council's Homeless Prevention Team, Citizen Advice, Money Advice Service, StepChange, Money Matters, Age UK, and local relevant charitable/voluntary sector organisations.
		The council intends to set up a discretionary relief fund if these proposals are approved to help those in most need to pay for all or part of the additional charges.
Other Significant Impacts	None identified.	



# **Equality and Safety Impact Assessment SSEG1**

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

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

	Introduce charging for Blue Badge holders for parking in		
Description of	council owned off-street car parks		
Proposal			

## **Brief Service Profile (including number of customers)**

Southampton City Council manages over 5,000 off street public parking spaces and 1,500 on street parking spaces across the city. The income generated from this is used to invest in infrastructure and other initiatives within Southampton.

The Disabled Person's Parking Badge Scheme, also known as the Blue Badge Scheme, provides a national arrangement of parking concessions for people with severe mobility difficulties, who travel either as drivers or passengers. A Blue Badge is designed to help disabled people park close to their destination, either as a passenger or driver. There are 7,781 Blue Badge holders in the city and over 50% of those are people with walking difficulties.

Blue Badges are specifically intended for on-street parking. The Blue Badge allows holders to park for free:

- on streets with parking meters or pay-and-display machines for as long as required.
- in disabled parking bays on streets for as long as required (unless additional time restrictions are in place).
- on single or double yellow lines for up to 3 hours (unless there is a 'no loading' sign).

Southampton City Council currently allows Blue Badge holders to park in some offstreet car parks for free, and for as long as required, in addition to the provisions for on-street parking through the Blue Badge scheme.

## **Summary of Impact and Issues**

The proposal is to withdraw free parking in off-street car parks for Blue Badge holders, meaning that Blue Badge holders who choose to park in off-street car parks will be subject to the same charges, terms and conditions as other users. Other local

authorities already charge blue badge holders for parking in off-street car parks.

The introduction of charges for Blue Badge holders apply to all council owned surface car parks and to the West Park Road Multi-story Car Park (MSCP). All other MSCPs in the city already have barrier systems in place, meaning that those with Blue Badges pay for parking in these car parks.

Blue Badge holders will still have designated spaces within off-street car parks, however they will be expected to pay the same parking charge as all users of that car park and be subject to any time restrictions in place in that car park. Blue Badge holders will continue have the option to make use of on-street parking for free, and these changes will apply to off-street car parks only.

The withdrawal of free, unlimited parking in off-street car parks for Blue Badge holders will allow the council to better manage turnover in high demand car parks and ensure equality of charging across all users.

## **Potential Positive Impacts**

The introduction of charging for Blue Badge holders in surface car parks will reconcile car parking charges for all users of surface car parks and increase the turnover of car parking spaces in high demand car parks, generating capacity for further investment in car parking infrastructure.

Responsible	Rosie Zambra, Service Lead: Environment Street Scene &
Service Manager	Health.
Date	6 September 2018
Approved by	Mitch Sanders, Service Director: Transaction & Universal
Senior Manager	Services.
Date	6 September 2018

Impact Assessment	Details of Impact	Possible Solutions & Mitigating Actions
Age	This proposal will have an impact on blue badge holders aged over 17 years who drive and all ages who are passengers in cars. Higher numbers of older people are likely to be Blue Badge holders.	Charges only apply to off- street car parks. There is a statutory requirement to provide free on street car parking, which is often nearer to a destination. Signing in car parks and communications will draw
	The impact will require Blue Badge holders to pay for parking which was previously free if they choose to park in off-street car park, and mean that they are subject to any terms and conditions of the car park such as time restrictions.	attention to this change.

Impact	Details of Impact	Possible Solutions &
Assessment		Mitigating Actions
Disability	All Blue Badge are people who have a disability or health condition that affects their mobility.	Charges only apply to off- street car parks. There is a statutory requirement to provide free on street car
	The proposal to introduce charges in off-street car parks will have a financial impact on this group if an individual choses to park in an off-street car park.	parking, which is usually nearer to a destination. Signing in car parks and communications will draw attention to this change.
	Blue Badge holders will be subject to the terms and conditions of the car park, which may include time restrictions, including a two hour parking limit in car parks including the Civic Centre Forecourt and Albion Place (Castle Way). People with a disability that affects their mobility may be more affected by time limitations than those who do not have a disability.	
Gender	not have a disability.  No identified impact.	
Reassignment	No identified impact.	
Marriage and Civil Partnership	No identified impact.	
Pregnancy and	No identified impact.	
Maternity	Tro tachtina impact.	
Race	No identified impact.	
Religion or Belief	No identified impact.	
Sex	No identified impact.	
Sexual	No identified impact.	
Orientation		
Community Safety	No identified impact.	
Poverty	People who are disabled and rely on their Blue Badge for free parking, who are on low income, may be impacted by the charging for off-street car parks.	Free on-street car parking is available for anyone who is a Blue Badge Holder.
Health & Wellbeing	No identified impact.	
Other Significant Impacts	None identified.	



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

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

Name or Brief	Increase Itchen bridge fees for non-residents	
Description of		
Proposal		
Brief Service Profile (including number of customers)		

The Itchen Bridge first opened in 1977 to reduce the congestion from traffic leaving and entering the city. The bridge is operated and maintained by Southampton City Council and uses a variable toll, which is based on the height of the vehicle at the front axle. The Itchen Bridge serves as a major link between the east and west of the city, with a flow of around 20,000 vehicles per day. Crossing the bridge has always been subject to a toll payment, as introduced by the Hampshire Act upon opening of the bridge.

Some regular users of the bridge make payments by using a Smartcities card, whilst other users currently pay by cash, including people passing through the city on business or for leisure, and non-regular users. Concessions are available to local residents and local commercial businesses when paying using a Smartcities card.

Residents with a Blue Badge are entitled to free travel across the Itchen Toll Bridge with a Smartcities card. Owners of fully electric vehicles can cross the Itchen Bridge free of charge with a SmartCities card by applying for an Electric Vehicle concession.

The toll charges were last amended in 2013, with the change of prices and the introduction of split charges between peak and off peak for some vehicle classes.

Below is a table which shows the current charge for crossing the Itchen Bridge:

	Non-Smart Card users	Non- resident (Smart Card)	Local Resident (Smart Card)	Local Commercial (Smart Card)	Disabled person / Electric Vehicle (Smart Card)
Class 1 – motorcycles and three- wheeled vehicles	Free	Free	Free	Free	Free
Class 2 – cars, small vans and small 4x4s OFF PEAK	50p	50p	30p	30p	Free
Class 2 – cars, small vans and small 4x4s PEAK	60p	60p	40p	40p	Free
Class 3 large vans (e.g. transit) and large	£1.20	N/A	60p	60p	N/A

4x4s					
Class 4	£25	£25	N/A	c2	N/A
HGVs	123	£25	IN/A	LZ.	IN/A

## **Summary of Impact and Issues**

The proposal is to increase the Itchen Bridge Toll charges by 20p to vehicles in classes 2 and 3 and above crossing the bridge, who are not eligible for a concession. This will impact on non-residents, whether using a smart card or paying in cash, who are driving cars, small vans, small 4x4 and large vans, which include large transit and 4x4 vans.

The increase in the toll would not apply to residents that receive a concessionary toll through use of a Smart Card. Residents who do not currently have a Smartcities card would need to apply for one in order to avoid paying the increased charges.

Those that currently qualify for free use of the bridge would continue to do so, which includes motorcycles, electric vehicles and blue badge holders

The following pricing structure demonstrates the proposed charges for 2019 and beyond:

Class	18/19		19/20	
	Peak	Off-peak	Peak	Off-peak
Class 1 – motorcycles and three-wheeled vehicles	Free	Free	Free	Free
Class 2 – cars, small vans and small 4x4s	60p	50p	80p	70p
Class 3 – large vans (e.g. transit) and large 4x4s	£1.20	£1.20	£1.40	£1.40
Class 4 – HGVs	£25	£25	£25	£25

This increased charge will support the running costs of the bridge, including maintenance and management.

## **Potential Positive Impacts**

Increasing toll charges may encourage more people to seek alternative methods of transport (public transport, car shares, cycling etc.), leading to air quality and health improvements.

Responsible	Rosie Zambra, Service Lead: Environment Street Scene &
Service Manager	Health.
Date	6 September 2018
Approved by Senior	Mitch Sanders, Service Director: Transaction & Universal
Manager	Services.
Date	6 September 2018

Impact	Details of Impact	Possible Solutions &
Assessment		Mitigating Actions
Age	The increased charges will impact on drivers of all ages who are non-residents visiting the city for education, business or leisure and fall into the class 2 or 3 bracket, as well as residents who do not use a smart card.	Residents of the city can apply for a concession and will not have to pay for the increased amount.
Disability	No identified impact.	
Gender	No identified impact.	
Reassignment		
Marriage and Civil Partnership	No identified impact.	
Pregnancy and Maternity	No identified impact.	
Race	No identified impact.	
Religion or Belief	No identified impact.	
Sex	No identified impact.	
Sexual Orientation	No identified impact.	
Community Safety	No identified impact.	
Poverty	This proposal may have a negative impact on some users who are non-residents or non-smart card users, who are low income earners and need to travel to Southampton to work.	The price increase is to meet the running costs of the bridge, including maintenance and management. This charge would not apply to residents that receive a concessionary toll and this discount would be protected.
Health & Wellbeing	No identified impact.	
Other	None identified.	

Impact Assessment	Details of Impact	Possible Solutions & Mitigating Actions
Significant Impacts		

