

Scrutiny Board

4 July 2017

Time 6.00 pm **Public Meeting?** YES **Type of meeting** Scrutiny
Venue Committee Room 3 - Civic Centre, St Peter's Square, Wolverhampton WV1 1SH

Membership

Chair Cllr Stephen Simkins (Lab)
Vice-chair Cllr Barry Findlay (Con)

Labour

Cllr Ian Angus
Cllr Paula Brookfield
Cllr Jasbir Jaspal
Cllr Rupinderjit Kaur
Cllr Louise Miles
Cllr Peter O'Neill
Cllr Jacqueline Sweetman
Cllr Lynne Moran
Cllr Zee Russell
Cllr Linda Leach

Conservative

Cllr Arun Photay

Quorum for this meeting is four Councillors.

Information for the Public

If you have any queries about this meeting, please contact the democratic support team:

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Some items are discussed in private because of their confidential or commercial nature. These reports are not available to the public.

Agenda

Part 1 – items open to the press and public

Item No. *Title*

MEETING BUSINESS ITEMS

- 1 **Apologies for absence**
- 2 **Declarations of interest**
- 3 **Minutes of the previous meeting** (Pages 3 - 6)
[To approve the minutes of the previous meeting as a correct record.]
- 4 **Matters arising**

PRE-DECISION SCRUTINY ITEMS

- 5 **Review of Non-residential Contributions Report** (Pages 7 - 14)
[Helen Winfield, Head of Service – Community Financial Support, to present report]
- 6 **Proposed Citywide Public Spaces Protection Order - dog control** (Pages 15 - 22)
[To provide comments and feedback prior to the report being considered by Cabinet on 19 July 2017]

DISCUSSION ITEMS

- 7 **Electoral Registration Public Engagement Strategy** (Pages 23 - 36)
[To provide comments and feedback on the electoral registration public engagement strategy for 2017/18]
- 8 **Information Governance Performance Report - Quarter Four 2016/17** (Pages 37 - 48)
[Anna Zollino-Biscotti, Information Governance Manager, to present update report on the performance of Information Governance]
- 9 **Work programme**
[To receive an update from the Scrutiny Team on the Work Programmes.]

Attendance

Members of the Scrutiny Board

Cllr Stephen Simkins (Chair)
Cllr Ian Angus
Cllr Jasbir Jaspal
Cllr Louise Miles
Cllr Peter O'Neill
Cllr Arun Photay
Cllr Zee Russell
Cllr Linda Leach
Cllr Alan Bolshaw

In Attendance

Cllr Sandra Samuels

Employees

Mark Taylor	Director
Julia Cleary	Systems and Scrutiny Manager
Neil White	Scrutiny Officer
Brendan Clifford	Integrated Project Director
Tim Johnson	Strategic Director - Place
Greg Bickerdike	Graduate Management Trainee
Jaswinder Kaur	Democratic Services Manager

Part 1 – items open to the press and public

Item No. *Title*

- 1 Apologies for absence**
Apologies for absence were received from Councillors Paula Brookfield and Jacqueline Sweetman. Councillor Alan Bolshaw attended as a substitute for Councillor Rupinderjit Kaur.
- 2 Declarations of interest**
There were no declarations of interest.
- 3 Minutes of the previous meeting**
Resolved:
That the minutes of the meeting held on 25 April 2017 be approved as a correct record and signed by the Chair.

4 **Matters arising**

Councillor Jasbir Jaspal referred to Scrutiny Arrangements in relation to the West Midlands Combined Authority on page 5 from the minutes of the previous meeting and inquired as to who the chair of the West Midlands Combined Authority Scrutiny Committee would be.

The chair stated that to date a chair had not been appointed, however it was his understanding that the opposition party to that of the West Midlands Mayor would appoint a chair.

5 **Schedule of Petitions Annual Update 2016 to 2017**

The board received a report on the Schedule of Petitions, the report detailed actions taken in relation to petitions received in the last municipal year.

The board requested a status update on the petition regarding fly-tipping in Blakenhall. Julia Cleary clarified the petition required a response by 12 June 2017 and was currently pending, Environmental Health would respond by the deadline.

The board remarked that the Schedule of Petitions was helpful and that the practice be continued and increased in frequency to six-monthly updates. The board inquired as to whether ward members were automatically and routinely advised of petitions affecting them. Julia Cleary advised that ward members were informed when petitions were received, but would check with the relevant officer if ward Councillors were advised of the outcome of the petitions.

Resolved:

1. That the actions taken in relation to all petitions received by the council during the last municipal year be noted.
2. That it be agreed that the board receive a six monthly update report detailing actions taken in relation to all petitions received by the council.
3. That ward members be automatically notified of the outcome of petitions affecting them.

6 **People Directorate Commissioning Strategy**

Councillor Sandra Samuels and Brendan Clifford presented the draft People Directorate Commissioning Strategy for the board to comment on before final submission to Cabinet for approval.

Councillor Sandra Samuels highlighted that the strategy brings together a wide range of transformational activity, which would guide the People Directorate through a single narrative and model. An early draft of the strategy had been shared with Ofsted who reacted positively. The strategy addresses the needs of the community, assisted by the reorganisation of the commissioning unit. Councillor Sandra Samuels informed the board that she was happy to answer questions, assisted by Brendon Clifford.

The board was pleased with the overall approach however raised concern in relation to the risk of non-compliance and unsatisfactory standards of service. Councillor Sandra Samuels advised that there was a quality framework that providers would be assessed against with regular inspections. Brendon Clifford added that officers had regular contact with the care homes and shared soft intelligence with the Care

Quality Commission (CQC). The cabinet member was also kept apprised of the outcome of inspections and informed of any issues.

The board noted the predicted 44.7% increase in elderly people by 2037, emphasising the need to anticipate the increase in demand.

The board queried whether there were safeguards in place if external providers withdrew for commercial reasons. Councillor Sandra Samuels stated that a team had been established in response to previous occurrences of this situation and this team distributed the individuals that the home was responsible for between other homes across the city. Brendon Clifford added there was currently an oversupply of care home provision, so there was capacity to rehouse if required.

The board queried how much notice providers were required to give for terminating their contract, Brendon Clifford responded that it was at least a month and that their duty of care would mean this was likely to be longer.

The board queried who had the power during the commissioning process. Brendon Clifford advised that the council was independent but co-operative with its partners and that the law states that all parties involved had a responsibility to integrate and work together. To this end, the council has raised its financial contribution to the cost of care.

The board queried whether there was a case to build an in-house care provision service. Councillor Sandra Samuels said that 90% of adult social care (ASC) had been out sourced and the council's increased financial contribution of £14.12/hour was still cheaper than the cost for an in-house service to be provided.

The board requested that councillors be provided with training on commissioning processes, so that councillors were well informed when dealing with public scrutiny.

The board inquired as to what consultation had been undertaken in regards to commissioning and steps taken to ensure accountable care. Brendon Clifford responded that Linda Sanders (Strategic Director of People) attended the Executive Commissioning Group and that Paul Smith (Head of Commissioning) attended the Clinical Commissioning Group (CCG) committee to provide influence and raise issues on behalf of the Council. The strategy also ensures accountability by using the relevant sections of the NHS Five Year Forward View.

The board queried whether the Strategic Sustainability Plan had been considered and how it fitted into the integrated plan. Councillor Sandra Samuels advised that the Sustainable Transformation Plan had been considered, Brendon Clifford detailed the aims of the plan and that they were a fundamental part of the Sustainable Transformation Plan.

The board raised the potential issue of a local hospital closing and the members discussed the idea of a joint meeting of several scrutiny panels, (Confident, Capable, Council, Adults and Safer City and Health). The chair specified that each panel would look at their respective area to further analyse the strategy at the conclusion of the mental health strategy review.

Resolved:

1. That the draft People Directorate Commissioning Strategy 2017-21 *Shaping Futures, Changing Lives* be submitted to Cabinet for approval.
2. That an informative commissioning workshop be provided to all councillors.
3. That meetings of joint scrutiny panels (Confident, Capable, Council, Adults and Safer City and Health) be arranged to further analyse the strategy at the conclusion of the Adult Mental Care Commissioning review.

Brendon Clifford left the meeting at 18:47.

7 **Forward Plan & Risk Register**

The board considered the Forward Plan and Risk Register and was requested to identify any items for pre-decision Scrutiny.

The board sought clarification on the financial threshold for key decisions in the forward plan and suggested increasing the threshold. The chair stated that it was not the remit of scrutiny to determine the threshold.

The board requested that the forward plan be populated in advance to aid pre-decision scrutiny. Senior officers were requested to follow up on this action. Tim Johnson agreed, but advised the board that more flexibility would be required for distant items on the forward plan.

The board requested that Risk Reference 3 (Information Governance) be reassessed due to the significant financial penalties for data breaches. Julia Cleary advised that Anna Zollino-Biscotti had been contacted and Information Governance would form part of the work plan for the Scrutiny Board.

The board noted that there had been an increase in the number of respondents to the budget consultation this year. The board queried whether the consultation process should be reviewed to find out about the experience consultees received and whether their views were taken on board and whether any changes were made as a result.

The board suggested that officers attend scrutiny meetings to understand how scrutiny operates and build resilience.

The board went on to emphasise the importance of post-decision scrutiny.

Resolved:

1. That the Forward Plan and Risk Register be noted.
2. That Senior Officers cascade to officers the need to populate the forward plan in advance.

The chair thanked everyone for attending and closed the meeting.

Cabinet Meeting

19 July 2017

Report title	Approval to Consult on Review of Non-residential Contributions to Adult Social Care	
Decision designation	AMBER	
Cabinet member with lead responsibility	Councillor Sandra Samuels Adults	
Key decision	Yes	
In forward plan	Yes	
Wards affected	All	
Accountable director	Linda Sanders Strategic Director - People	
Originating service	Adult Social Care	
Accountable employee(s)	Helen Winfield	Head of Service – Community Financial Support Tel 01902 553353 Email helen.winfield@wolverhampton.gov.uk
Report to be/has been considered by	People Leadership Team	15 May 2017
	Strategic Executive Board	25 May 2017
	Adults Budget Working Group	13 June 2017
	Scrutiny Board	4 July 2017

Recommendation(s) for action or decision:

The Cabinet (Resources) Panel is recommended to:

1. Approve a period of public consultation on the review of the policy for Adult Social Care non-residential contributions towards care and support
2. Agree the proposed model to take forward for public consultation as set out in the report
3. Agree to receive a report on the outcome of public consultation and final proposals for a new policy at Cabinet (Resources) Panel on 14 November 2017
4. Agree to maintain the provision of up to six weeks non-residential reablement support free of charge under the intermediate provisions of the Care Act 2014.

1. Purpose

- 1.1 Approval is sought to undertake a public consultation from 24 July to 15 October 2017 as part of this year's review of non-residential contributions. It is proposed that the Council change from a banded contributions scheme to a system of full financial assessment of individuals in receipt of non-residential Council support under the provisions of the Care Act 2014. The outcome of the consultation with recommendations for the new scheme would be presented to Cabinet (Resources) Panel on 14 November 2017.

2. Background

- 1.1 The City of Wolverhampton (CWC) Council's current Non-residential Banded Contributions scheme is long-standing (since July 1999) and has been reviewed annually with public consultation as part of the review process when there has been an above-inflationary increase in the proposed contribution rates. The current rates were approved by Cabinet Resources Panel in 2015. There was no review in 2016 as relevant working-age social security benefits were frozen.
- 1.2 Prior to the implementation of the Care Act 2014 from April 2015, Section 17 of the Health and Social Services and Social Security Adjudications (HASSASSA) Act 1983 gave councils a discretionary power to charge adult recipients of non-residential services and statutory guidance to Councils was provided by 'Fairer Charging' and 'Fairer Contributions' guidance. The CWC banded contribution scheme, with the option to request a full financial assessment, was fully compliant with these provisions.
- 1.3 Section 14 of the Care Act 2014 and the Care and Support statutory guidance is the current provision giving councils the power to charge individuals for the care and support they receive.
- 1.4 A recent independent review of Wolverhampton's charging scheme concluded that the operation of a banded contributions scheme as opposed to full financial assessment of individuals' resources according to their ability to pay a contribution towards their non-residential care and support, may be open to legal challenge.
- 1.5 It is also recognised that under the current banded contributions scheme, individuals with a higher income who are not in receipt of a means-tested benefit may be contributing significantly less of their overall income than an individual with less income in receipt of a means-tested benefit.

3. Introduction

- 3.1 In response to the Care Act 2014 provisions and the recommendations of the independent review, it is proposed that a new and fairer contributions policy based on

assessment of an individual's income and capital is introduced following public consultation. The proposed new contributions policy would be subject to annual review (as has been the practice with the current contributions policy) following the annual review of social security benefit rates by the Departments for Work and Pensions and the Care and Support (Charging and Assessment of Resources) Regulations by the Department of Health.

- 3.2 The proposed charging model will also need to ensure that we are prepared for any future changes to the funding of social care in terms of the individual assessment of income and capital.
- 3.3 Since the implementation of the Care Act 2014, all other local authorities have charging schemes based on individual assessments of income and capital.

4. Care Act considerations and proposals

- 4.1 Under the Care Act 2014, for individuals with capital below the threshold (currently £23,250), non-residential charges must not reduce their income to below a certain amount. This amount is known as the Minimum Income Guarantee (MIG) and is reviewed yearly in April. Income above the MIG is described as a person's 'disposable income' and is considered to be available to make a contribution towards the cost of their care and support.
- 4.2 The Care and Support statutory guidance states that local authorities should consider whether it is appropriate to set a maximum percentage of disposable income (over and above the guaranteed minimum income) which may be taken into account in the financial assessment. It is proposed that a simple and fair way of allowing individuals to keep more of their disposable income is through a combination of an allowance for housing costs not met by Housing Benefit and/or Council Tax Reduction and a disability benefit disregard (see 3.5 and 3.6 below). This would allow a set amount for all individuals whereas a maximum percentage of disposable income would favour those individuals with more income.
- 4.3 Individuals provided with care and support under the Care Act are usually also in receipt of Department for Work and Pensions (DWP) disability benefits (Attendance Allowance/Disability Living Allowance care component/Personal Independence Payment daily living component) from which, in accordance with the guidance, contributions to care and support can be reasonably expected.
- 4.4 The mobility component of Disability Living Allowance (DLA) or Personal Independence Payment (PIP), in accordance with guidance, would be disregarded in the financial assessment.

- 4.5 The guidance recognises that where individuals are in receipt of disability benefits they may also have additional expenditure related to their disability, such as additional heating requirements or laundry, which is not met by the local authority and therefore should be allowed for in the financial assessment.
- 4.6 To minimise the complexity of the financial assessment which determines an individual's contribution, it is proposed to combine some protection of an individual's disposable income with an allowance for disability-related expenditure by disregarding 20% of an individual's disability benefit, with an option for requesting an enhanced financial assessment using actual evidenced expenditure on disability needs to determine any higher allowance. This model, for example, has been implemented by Dudley Metropolitan Borough Council.
- 4.7 The Guidance also states that local authorities should consider whether it is appropriate to set a maximum charge such as a maximum percentage of care home charges in the local area which could help ensure that people are encouraged to remain in their own homes, promoting individual wellbeing and independence. It is proposed that for individuals with capital below the capital threshold, the maximum contribution should be set at the average Personal Budget rate for a residential care home. This means that the contribution would be capped at £394.94, currently per week, Wolverhampton's current fee level for residential care.
- 4.8 The current contributions policy exempts carers from charges. The Guidance suggests that council's recognise that it unlikely to be efficient to charge carers for meeting their eligible needs as this could potentially lead to carers refusing support. It is considered that for those carers who do not have the means to self-fund, charging could lead to carer breakdown and therefore cost the Council more in meeting eligible need for the individual. However, based upon the principle of care and support provision being based upon the ability to contribute, it is proposed that eligibility for carer support should have a ceiling set at the self-funding capital threshold (currently £23,250).
- 4.9 The Care Act requires that individuals with Creutzfeldt-Jacob Disease (CJD) are exempt from charges. The Care Act also requires intermediate care of up to six weeks to be exempt from charge.
- 4.10 Where a person's resources are above the financial limit (and they would therefore be a self-funder paying the full cost of care and support themselves) there is a right, under the Care Act, for them to request local authority support in making arrangements to meet their needs. The Guidance states that it may be appropriate for local authorities to charge a flat rate fee for arranging care but this must be set at a level which does not exceed the costs the local authority actually incurs. The current contributions policy is to charge a one-off fee of £150 in these circumstances. However, this amount does not take into account the cost to the Council of maintaining and reviewing support over subsequent

years and therefore it is proposed that in the new scheme an initial charge of £150 is made with a yearly charge of £75 thereafter.

5. Key considerations for a revised contributions policy

- 5.1 Following consultation by the Department for Work and Pensions (DWP), there was a programme to develop local authority access to the DWP Customer Information System (CIS) to allow verification of individuals' benefits information for financial assessment purposes. The Council's Financial Assessments Service has recently secured access to the system and is in the process of implementing the software provided.
- 4.2 This increased availability of DWP information provides an opportunity to undertake a more detailed financial assessment for those individuals in receipt of DWP means-tested benefits (currently in Bands A to E) without it impacting considerably on the resource required to undertake the assessment.
- 4.3 For those cases where individuals who are not in receipt of a means-tested benefit as they receive higher income than (currently in Bands F to H) a full financial assessment will determine a contribution that is appropriate for their individual income. Whilst a full assessment in these cases will be more resource intensive there are far fewer in number and would be managed within existing resources.
- 4.4 The financial assessment guidance for non-residential care and support states that disability-related expenditure (DRE) should be taken into account when a full financial assessment is undertaken which includes disability benefits. A review of other local authority's contributions policies and information provided by the independent review has highlighted that many authorities set standard levels of disability-related expenditure applied to each assessment with the option of a more detailed/enhanced assessment of disability-related expenditure if requested; an approach which would be built into our implementation process.
- 4.5 Clearly this proposal is a significant change of approach but it will bring the Council into line with the approach of other local authorities and will be based on an assessment of individuals' circumstances and their ability to contribute to the care and support provided by the Council.

5. Proposal summary and impact

- 6.1 It is proposed that a public consultation to implement a contributions policy for those in receipt of non-residential care, based on the full assessment of each individual's income is commenced. Service user's contributions to non-residential adult social care and support would reflect their disposable income (less a protected amount for housing costs) with a standard allowance for disability-related expenditure (DRE) applied and with the option of actual DRE being considered upon request.

- 6.2 To cap individuals' contribution to non-residential care and support, where their capital is below the threshold, at the average Personal Budget rate for a residential care home.
- 6.3 To charge individuals with resources above the financial limit where they request support from the Council in meeting their needs at the rate of an initial charge of £150 with a yearly charge of £75 thereafter.
- 6.4 To apply the capital limit (currently £23,250) above which individuals are required to self-fund, equally to carers.
- 6.5 To utilize the DWP system to identify benefits in payment to the individual to ensure a structured and improved implementation process.
- 6.6 To introduce a policy which is Care Act compliant, consistent with approaches used in other local authorities and adheres to the Personalisation Agenda by focusing on the individual and their individual income and capital when undertaking a financial assessment.
- 6.7 As the proposal is to introduce a full financial assessment of each individual's resources, the amount of the actual contribution will depend on the outcome of the individual financial assessment. For those individuals where we know the level of income because means-tested benefits are in payment – about 70% of the total number in receipt of non-residential care and support as at 9 May 2017 – an estimate of the likely effect can be provided (subject to varying amounts allowed for housing costs).
- 6.8 Under the proposal, for those individuals in receipt of a means-tested benefit there is likely to be:
- 7% paying no contribution
 - 34% ranging from between having a £1.50 reduction to paying a £2.50 increase in contributions per week
 - 44% ranging from between paying a £3.40 to a £9.60 increase in contributions per week
 - 15% ranging from between paying a £10.50 to a £14.60 increase in contributions per week
- Note:** There are a range of increases as there are differences between the amounts of means-tested benefits. Employment and Support Allowance income is about £4.00 more than Income Support per week and Pension Credit is about £17 per week more with pensioners also having a higher set Minimum Income Guarantee set by the Department of Health.
- 6.9 Some individuals not in receipt of means-tested benefits may be more significantly affected by the proposals but their contribution to the cost of the care and support received would still be determined by a full financial assessment based on their individual income and ability to pay.
- 6.10 Some case study examples are provided at **Appendix 1** to illustrate the potential impact of the proposals.

7.0 Financial implications

- 7.1 In 2016-17 the current banded policy generated in the region of £4.1 million in contributions towards the cost of non-residential care and support.
- 7.2 It is not able to quantify the total level of income that will be received as a result of this policy change as the actual contribution will depend on the outcome of the individual financial assessments. However, it is not expected that the new policy will have an adverse effect on the Council.

[AS/25052017/Y]

8.0 Legal implications

- 8.1 The legal implications are contained within the body of the report. The proposals are fully compliant with the Care Act 2014 and the Care and Support statutory guidance (as updated 24 February 2017).

[BS/26062017/R]

9.0 Equalities implications

- 9.1 An Equality Analysis has been undertaken which shows an adverse impact of these proposals on disabled people. This is to be expected as disabled people with eligible needs are the customer base for non-residential care and support under the Care Act 2014. However, the proposed contributions scheme is an equitable system in line with Care Act 2014 requirements and will achieve fairness across all age groups based on an assessment of individuals' circumstances and their ability to contribute to the care and support provided by the Council. The means employed to achieve the aims of the proposed policy are proportionate, necessary and appropriate.

10.0 Environmental implications

- 10.1 There are no environmental implications.

11.0 Human resources implications

- 11.1 There are no direct Human Resources implications.

12.0 Corporate landlord implications

- 12.1 There are no Corporate Landlord implications.

13.0 Schedule of background papers

- 13.1 None

Case Study Examples

Olive (Aged 59):

Olive suffered a stroke which has left her with difficulty mobilising and short-term memory problems. She is a home owner living with her adult son in the community. Olive receives 5 hours of personal care during the day each week at £14.12 per hour and she has Telecare at £9.00 per week – **a total cost of £79.60 per week for her care and support package.**

Olive has savings of £15,000 and an income of £276.65 per week (£109.65 Contributory Employment and Support Allowance plus £83.90 Occupational pension plus £83.10 enhanced rate Personal Independence Payment for daily living). She receives a Council Tax Reduction but is required to pay £17.02 per week towards her Council Tax which will be allowed for in the financial assessment

Olive would be **expected to contribute £67.11 per week (£1.50 more than her current contribution)** towards the cost of her care, leaving £209.54 per week for her to live on.

Note: As Olive has £750 savings above the lower threshold, a further £3.00 per week is added to her income in the financial assessment. If Olive had £23,250 or more in savings/capital then she would be expected to pay the full £79.60 per week cost of her care. Although Olive owns her own home the value of his property is not taken into account when assessing her savings/capital because this is where she is living.

Kishan (Aged 25):

Kishan has a learning disability. When his mother passed away he moved to live in a Wolverhampton homes flat in the community. He receives 7 hours of personal care per week at £14.12 per hour and 3 hours of outreach support at £13.00 per hour by way of an Individual Service Fund. **His total care and support package costs £123.00 per week.**

Kishan has an **income of £236.15 per week** (£180.50 Employment & Support Allowance including an amount for severe disability as he lives on his own, plus £55.65, standard rate Personal Independence Payment for daily living). He also receives Housing Benefit and a Council Tax Reduction but he has to pay £4.67 per week towards his Council Tax which will be allowed for in the financial assessment.

Kishan would be **expected to contribute £68.90 per week (£3.29 more than his current contribution)** to his care and support, leaving £167.25 per week for him to live on.

Albert (Aged 71):

Albert suffers with dementia and is physically frail. He lives in on his own in a privately rented house in the community. Albert receives 10.5 hours of personal care during the day each week at £14.12 per hour and he has Telecare at £9.00 per week – **a total cost of £157.26 per week for his care and support package.**

Albert has savings of £10,000 and an **income of £304.90 per week** (£221.80 State Retirement Pension/Pension Credit including an amount for severe disability as he lives on his own, plus £83.10 higher rate Attendance Allowance). He also receives Housing Benefit and a Council Tax Reduction.

Albert would be **expected to contribute £71.83 per week (£6.22 more than his current contribution)** towards his care, leaving £233.07 per week for him to live on.

Note: Albert's savings are disregarded as they are below the £14,250 lower threshold.

Financial Assessment Calculation: Income (including Disability Benefits*) + tariff income from capital over £14,250 minus **Minimum Income Guarantee** (as set by the Department of Health) = **Disposable Income**; minus **housing allowance** for costs not met by Housing Benefit/Council Tax Reduction; minus difference between lower and higher disability benefit where no night-time needs being met and minus **20% of Disability Benefits*** = **Contribution to costs of non-residential care and support.**

* Attendance Allowance/Disability Living Allowance care component/Personal Independence Payment daily living component

Cabinet Meeting

19 JULY 2017

Report title	PROPOSED PUBLIC SPACES PROTECTION ORDER – DOG CONTROL	
Decision designation	AMBER	
Cabinet member with lead responsibility	Councillor Steve Evans City Environment	
Key decision	YES	
In forward plan	YES	
Wards affected	All	
Accountable director	Ross Cook	
Originating service	Public Protection	
Accountable employee(s)	Shaun Walker	Public Protection: Service Lead
	Tel	01902 554548
	Email	Shaun.Walker@wolverhampton.gov.uk
	Adam Sheen	Legal Services
	Tel	01902 554926
	Email	Adam.Sheen@wolverhampton.gov.uk
Report to be/has been considered by	Place Leadership Team: 8 May 2017 Strategic Executive Board: 16 May 2017 Scrutiny Board 4 July 2017	

Recommendation(s) for action or decision:

The Cabinet is recommended to:

Approve the appended proposed citywide public spaces protection order (“PSPO”) – dog control – replacing the three existing dog control orders.

1.0 Purpose

- 1.1 To present findings from a review of existing dog control orders.
- 1.2 To seek approval for the proposed Public Spaces Protection Order (“PSPO”) pursuant to section 59 to 75 of the Anti-Social Behaviour, Crime and Policing Act 2014 (“the Act”) to replace the existing dog control orders following a change in tools and powers introduced in the Act. (A copy of the Proposed PSPO is attached for ease of reference.)
- 1.3 It is noted that per the City of Wolverhampton Council’s Constitution at Paragraph 16.3 Chapter 2 Delegations to Cabinet, the discharge of environmental functions of the Council relating to environmental health including management of dogs is Cabinet’s responsibility. (Page 88 of Constitution.)
- 1.4 To outline some of the other commonly used dog control measures in Appendix 1

2.0 Background

- 2.1 As can be seen in the documents appended to this report (“Appendix A”) the Council has three distinct dog control orders, made 27 February 2007 pursuant to Chapter 1, Part 6 of the Clean Neighbourhoods and Environment Act 2005, currently in operation. These orders prohibit dog fouling (and those in control of dogs failing to clean up after their dog), contain a requirement to keep dogs on a lead when walking dogs alongside certain major arterial routes in the City and include a requirement to put any dog perceived to be a nuisance on a lead at the insistence of an officer from the Council’s Public Protection team.
- 2.2 By virtue of section 75(2) Anti-Social Behaviour, Crime and Policing Act 2014 (“the Act”), within three years of the commencement of the Act (that is by 01 October 2017) all dog control orders will automatically lapse and will instead convert to PSPOs (sections 59 to 75 of the Act.)
- 2.3 However, rather than simply letting this happen, a review of the existing dog control orders has concluded that it is considered that the City of Wolverhampton Council would be better served by amalgamating the existing three dog control orders and expanding their provisions as explained below and as can be seen in the appended proposed PSPO (“Appendix B.”) Such course of action will require a new PSPO. The Anti-Social Behaviour, Crime and Policing Act 2014 came into force in October 2014 and introduced streamlined tools and powers to address ASB. Cabinet were briefed on local implementation of the legislation on 12 November 2014 and a multi-agency ASB Steering Group was established to oversee the changes. Wolverhampton has been instrumental in trialling these revised approaches and has shared practice across the West Midlands.
- 2.4 On 22 July 2015, Cabinet approved a trial of the first two PSPOs for the City; one in Low Hill to address long standing traveller encampment incursions and a second in Park Village to address entrenched ASB. The PSPOs came into force in September 2015, and

a review of their use has shown that whilst both locations have required focussed deployment of staff resource and significant coordination of enforcement activity between partner agencies, there has been a marked reduction in the associated ASB linked to these locations. It was agreed that no further PSPOs would be issued across the City until the review of these two PSPOs was concluded and any associated difficulties regarding implementation addressed. Given the success of the PSPOs in Low Hill and Park Village, further PSPOs are being considered (on a City-wide basis where appropriate) to tackle other longstanding sources of nuisance and anti-social behaviour.

2.5 The Act made provision for existing dog control orders to automatically become PSPOs within 3 years of the legislation coming into force. However, given the length of time that the dog control orders have been in place, it is appropriate that a review of their use is undertaken to inform the decision about the need for continuation of these powers. The existing dog control orders therefore remain in force until October 2017 or until such time as they are revoked by a replacement PSPO.

2.6 The proposals directly support the following Corporate Plan objectives:

- Keeping the City Clean – by reducing the prevalence of dog faeces throughout the City.
- Promoting and Enabling Healthy Lifestyles – by reducing the risk associated with exposure to the pathogen *Toxocara Canis* found in dog faeces.
- Supporting Businesses, Encouraging Enterprise and Investment – improving city image by targeting hotspot locations where dogs have previously posed a problem.
- Keeping the City Safe – creative use of new legal powers to tackle ASB and tackle nuisance and danger posed by out of control dogs.

3.0 Review of Existing Dog Control Orders

3.1 Although the existing framework of three dog control orders has allowed the successful and effective regulation of irresponsible dog ownership for a number of years, as set out in 2.3 above, a review of the existing dog control orders has established that the Council should amalgamate the existing three dog control orders and expand their provisions. It is believed this will simplify and strengthen the enforcement landscape around the control of dogs.

3.2 It is felt that by amalgamating the three existing dog control orders, it will provide clarity and simplicity for those searching for dog control orders in that all relevant orders relating to dog control in Wolverhampton will then appear in one place – the proposed PSPO.

3.3 In terms of the requirement to keep dogs on leads near to arterial routes, it is also considered that there is no good reason why certain arterial routes in the City are covered but other roads which are equally as busy fall outside the order.

3.4 With reference to dogs near schools, in play areas and on tennis courts, dogs in these locations, especially when there is a large number of people about can get excited and become out of control. This is perceived to be a potential nuisance which is only partially catered for in the existing orders. It was felt the review of the existing dog control orders provided an opportunity to consolidate the existing orders into one all-encompassing order and fill in the gaps that exist presenting the opportunity for dogs to cause nuisance.

4.0 The Proposed Dog Control PSPO

4.1 The proposed PSPO comprises 6 sections – 4 requirements and 2 prohibitions.

4.2. The first requirement is for those in control of dogs to keep their dogs on a lead when near to a major road in Wolverhampton. The order then lists the ring road and 10 other “A” roads (being all the A roads) which pass through Wolverhampton. This requirement is based on public safety and the welfare of dogs being an attempt to prevent stray or uncontrolled dogs getting loose on the main road.

4.3 The second requirement is for those in control of dogs to keep their dogs on a lead at all times when on Northcote Farm. This is carried over from the previous order and is designed to prevent uncontrolled dogs attacking or killing livestock on the Northcote Farm site.

4.4 The third requirement is for those in control of dogs to keep their dogs on a lead within 100 metre radius of any school or academy building where such educational institute caters for pupils up to 16. The educational institutes are listed by reference to a list of 0-16 years educational institutions in Wolverhampton which the authority maintains and updates from time to time. This prohibition is required to prevent out of control dogs biting or frightening children as sight of lots of children going to or leaving school at the same time can cause some dogs to get over excited.

4.5 The fourth requirement is for those in control of dogs to put their dogs on a lead if instructed to do so by a police officer (including police community support officer) or Council Officer. This is carried over from the existing dog control order which is designed to allow Environmental Health Officers to instruct owners/those who should be in control of dogs, to put their dogs on a lead where dogs are causing obvious nuisance. The only difference is this order intends to empower police officers and police community support officers in this respect just as certain council officers are currently empowered.

4.6 Regarding the prohibitions, there is a prohibition against dog fouling in public areas in the City (and the requirement for those in control of a dog to pick up after their dog noting that it will not always be possible or practicable to prevent a dog fouling.) This is carried over from the existing order.

4.7 Dogs can be a nuisance on tennis courts and in children’s play areas. Therefore, there is a specific list of tennis courts and play areas from where dogs will be banned altogether. There is still a vast amount of public space throughout the City where dogs can be exercised, and if challenged, on that basis, it would be argued such prohibition is

proportionate. Appropriate signage will be erected clearly marking play areas and tennis courts from where dogs are prohibited.

- 4.8 The above prohibitions and requirements do not apply to those in control of assistance dogs.

5.0 Consultation

- 5.1 The process for seeking authorisation of a PSPO requires consultation to be undertaken with Police and with communities impacted by the order. Consultation with West Midlands Police has taken place at a multi-agency ASB meeting held on 1 March 2017; Police are in support of the introduction of an expanded dog control PSPO to retain the existing provisions, amalgamated into one all-encompassing order in line with the proposals detailed in section 4 of this report.

- 5.2 A six week public consultation on the proposals supported by the City Council's Communications Team was undertaken commencing mid May 2017 and opportunities to feed into the consultation were broadly publicised.

- 5.3 As a key part of the public consultation process, Scrutiny Board considered the proposals at its meeting on 4 July.

- 5.4 A summary of feedback received to date is detailed below. **Insert consultation summary responses.**

6.0 Implementation

- 6.1 Subject to Cabinet authorisation of the PSPO, the proposals must be publicised and will be subject to a six week period during which an appeal against the proposals can be made to the High Court before coming into force. This will include communications through partner and community networks, social media, the Council and SWP websites and an advertisement in the local press.

- 6.2 Subject to Cabinet approval and assuming no appeal against the proposals is lodged with the High Court within the six week timeframe, the PSPO would come into force on 3 September 2017.

- 6.3 The conditions of the PSPO would be in place for a period of three years; revisions to the prohibitions contained within the PSPO are not proposed within this period, however, the impact of the order will be closely monitored to allow for any operational variations across partners to be built in as required. The PSPO will be subject to review before its expiry in April 2020.

7.0 Recommendations

- 7.1 In light of above and responses to the consultation exercise, Cabinet is requested to authorise:

- i) A three year city-wide dog control order requiring a person in control of a dog (or dogs) to keep their dog(s) on a lead when alongside the major arterial roads in the City and on land at Northcote Farm.
- ii) A requirement to keep dogs on a lead within a 100 metre radius of any school or academy (catering for pupils 0 to 16 years.)
- iii) A prohibition from allowing dogs to enter specified fenced children's play areas and public park tennis courts in the City of Wolverhampton Council area.
- iv) A prohibition from those in control of dogs allowing their dogs to foul in public places and a requirement on those in control of dogs to remove any faecal matter immediately from public spaces.
- v) A requirement for those in control of dogs, on the instruction of any police officer, police community support officer or officer of the Council, to put any dog in their control on a lead.
- vi) A review of the PSPO prior to its expiry in April 2020.

8.0 Financial implications

- 8.1 The cost of the statutory notice, consultation and signage will be met from existing budgets within the Public Protection Team's budgets. [HM/01062017/G]

9.0 Legal implications

- 9.1 The Anti-social Behaviour, Crime and Policing Act 2014 ("the Act") came into effect on 20 October 2014.
- 9.2 Section 59 of the Act gives local authorities the power to make PSPOs which are intended to deal with anti-social behaviour and nuisance in a particular area that is detrimental to the local community's quality of life by imposing conditions on the use of that area.
- 9.3 Before making a PSPO, councils must consult with the local police (section 72(3) and 72(4) of the Act). Formal consultation was held with West Midlands Police on this matter on 01 March 2017 where support for these proposals was recorded.
- 9.4 The Act also stipulates that councils must consult with the local community on any proposed PSPO. Consultation opportunities have been widely publicised across the city within communities, councillors, business sector and partner agencies.
- 9.5 Anyone who lives in or regularly works or visits the area can appeal a PSPO in the High Court within six weeks of issue. The PSPO will be publicised locally. Signage will not be erected until after the six week period or, if an appeal is lodged, after any High Court ruling.

9.6 With regard to breaches of a PSPO, it is an offence for anyone, without reasonable excuse, to do anything s/he is prohibited from doing by virtue of the order. Furthermore, it is an offence for anyone, without reasonable excuse, to fail to comply with a requirement in the PSPO. Section 67 of the Act specifies that anyone found guilty of an offence can be fined up to £1,000 by the Magistrates' Court. Section 68 of the Act provides that, in the alternative, a constable or authorised officer of the Local Authority (that is a person authorised by the Managing Director or Head of Regulatory Services in accordance with a previous delegated authority of Tim Johnson, Strategic Director, Place dated 04 May 2016) may serve a fixed penalty notice on those in alleged breach offering them the opportunity to discharge liability by payment of Fixed Penalty Notice in an amount set by each local authority up to £100. Fixed penalty notices in Wolverhampton are currently set at £80.

9.7 The prohibitions and requirements of a PSPO need to be proportionate to the nuisance/mischief they seek to prevent. Limiting the requirements to A roads (not "B" roads), and educational institutions for pupils 0 to 16 not beyond 16, is proportionate it will be argued in the event of any challenge. [AS/14062017/Q]

10.0 Equalities implications

10.1 An equalities screening assessment has been carried out. There is no evidence to suggest that the proposal may be directly or indirectly discriminatory. It is to be noted, that the proposed PSPO cannot apply and makes it clear on the face of the order that it does not apply to those in control of assistance dogs.

11.0 Environmental implications

11.1 The proposals would have a positive environmental impact by reducing the litter associated with dog fouling. Requiring dogs causing a nuisance to be kept under control around the major arterial traffic routes in the City and in and around play areas, tennis courts and schools, would abate the actual and likely nuisance caused by out of control dogs and make the environment throughout the City feel safer and more welcoming.

12.0 Human resources implications

12.1 There are no known human resources implications.

13.0 Corporate landlord implications

13.1 There are no known corporate landlord implications.

14.0 Schedule of background papers

14.1 There are no relevant background papers.

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Scrutiny Board

4 July 2017

Report title	Public Engagement Strategy	
Cabinet member with lead responsibility	Councillor Andrew Johnson Resources	
Wards affected	All	
Accountable director	Kevin O'Keefe, Governance	
Originating service	Electoral Services	
Accountable employee(s)	Laura Noonan Tel Email	Project Manager 01902 555053 Laura.noonan@wolverhampton.gov.uk
Report to be/has been considered by	n/a	

Recommendation(s) for action or decision:

The Scrutiny Board is recommended to:

1. Comment on the electoral registration public engagement strategy for 2017/18.

1.0 Purpose

- 1.1 The purpose of this report is to outline the proposal for electoral registration activity for 2017/18, and in particular the approach to working with key partners to target under-registered groups and areas in Wolverhampton.

2.0 Background

- 2.1 The public engagement strategy has been developed to ensure that City of Wolverhampton Council continues to strive to maintain an accurate and complete register. Data from the 2016 canvass, along with other sources including census data and Mosaic profiles have been analysed to build up a profile of voter registration rates in Wolverhampton. Please see **appendix 1** for the public engagement strategy.
- 2.2 Overall registration rates are quite strong at 90.3% after the 2016 canvass, and this has improved further in the run-up to the general election. There are a number of areas where response was lower (worst in Heath Town – 81.6% and St Peter’s -78.9%).
- 2.3 Priority areas and groups have been identified due to two main reasons; a low response rate (less than 88%) and/or a high percentage of priority groups in the area.
- 2.4 The Electoral Registration Officer (ERO) has identified students, BME communities (where levels of English as a first language are lower than usual) and private sector tenants as priority groups, as they are particularly under-registered.
- 2.5 The data analysis has revealed the following ten priority areas:

Ward	Response Rate	Priority Groups
Blakenhall	93.5%	<ul style="list-style-type: none"> • High percentage of BAME and low levels of English as first language • Above average social and private rented • Above average number of students
Bushbury South and Low Hill	88.9%	<ul style="list-style-type: none"> • Above average BAME
East Park	86.6%	
Ettingshall	89.9%	<ul style="list-style-type: none"> • Above average BAME • Above average transient renters
Fallings Park	88.8%	
Graiseley	93.4%	<ul style="list-style-type: none"> • High percentage of BAME and low levels of English as first language • High percentage of transient renters
Heath Town	81.6%	<ul style="list-style-type: none"> • High percentage of students • Above average BAME • High percentage of transient renters
Park	94%	<ul style="list-style-type: none"> • Above average BAME and low levels of

		<p>English as first language</p> <ul style="list-style-type: none"> • Above average number of students • High percentage of transient renters
Tettenhall Regis	87.3%	
St Peter's	78.9%	<ul style="list-style-type: none"> • Above average BAME and low levels of English as first language • Above average number of students • High percentage of transient renters

2.6 Resourcing issues over the past two years, in the absence of an Electoral Services Manager, have made it difficult to effectively target key groups/areas. The Council has recently appointed a Project Manager to the Electoral Services team, and a key part of their role is to strengthen registration amongst under-registered groups.

3.0 Progress against the delivery of 2016/17 public engagement strategy

3.1 The primary innovation for 2016 was the introduction of a new approach to the canvass. Rather than using about 150 people taking paper forms to small areas of the city, the Council recruited a team of about 15 people to work full time, using tablet devices to collect and transmit information. This significantly reduced the volumes of paperwork and data was immediately transferred into the electoral registration system, rather than having to be manually entered.

3.2 In 2016/17 progress has been underway to increase registration rates and engagement amongst students, attainers and black and minority ethnic groups. The 2017/18 public engagement strategy will build on this to develop more partnerships to strengthen registration rates amongst these groups.

3.3 A strong partnership has been developed with the University to promote student registration. Electoral Services has supported registration at key points throughout the year, most recently at a pop-up registration desk at the University to encourage people to register to vote for the general election. Progress is underway to develop a data sharing agreement with the University to embed student voter registration in to the student registration process for September 2018. This is a good practice model that was developed by Sheffield Council and Sheffield University and it has significantly increased the percentage of eligible students registered. This will reduce the cost of canvassing student properties and halls of residence.

3.4 In March 2017, a letter was sent to all 16 and 17 year olds in the city to advise them that they can be added to the electoral register as an attainer, so that when they are 18, they will be able to vote in elections.

3.5 A video was developed to explain the supplementary voting process used in the Mayoral election in May 2017. The video was in English, Gujarati, Polish and Punjabi. It was trialled in Blakenhall as Blakenhall has the highest percentage of Black and Minority Ethnic residents in the city, and these are the most widely spoken languages in the ward.

This was developed in response to one of the recommendations from the Electoral Registration scrutiny review to develop video material that can be used by polling station staff to advise non-English speakers how to vote. A postcard was sent to every elector in Blakenhall to encourage them to view the video ahead of polling day, and Presiding Officers encouraged voters to view the video on tablet devices in polling stations on polling day. Presiding Officers felt the concept was a good idea, but only a handful of voters viewed it in polling stations. The video was viewed 155 times online. There were staff in the polling station who could speak Gujarati and Punjabi and this was much more beneficial. A generic video on the voting process in multiple languages has also been produced, and this will be shared on social media ahead of future elections.

- 3.6 A dedicated elections page has been established on the Wolverhampton Information Network website in addition to the elections page on the Councils website. This reaches a wider audience than the corporate website, and it has a translation feature. This will continue to be updated throughout the year to explain the canvass process, encouraging people to register to vote and to provide information on upcoming elections.

4.0 2017/18 public engagement – Students and attainers

- 4.1 Electoral Services will continue to work with the Dean of Students at the University of Wolverhampton and the President of the Students' Union to register students to vote at the point of university registration and to attend key events such as freshers' fayre to inform students that they are eligible to vote at their home and term time address.
- 4.2 A meeting is scheduled with Wolverhampton College and The Way in June to discuss how Electoral Services can work with them to improve registration rates amongst attainers and students. There may be scope to adopt the university voter registration model at the college. Engagement activities such as presentations, pop up registration stands and involving students in the elections process will also be explored.
- 4.3 Education now provides a quarterly report of students that have turned 16, so that Electoral Services can target attainers for registration.

5.0 2017/18 public engagement – next steps

- 5.1 Work is underway to develop partnerships with community groups to promote registration. Research has found that street marketing, such as pop up stands in the community can be highly effective for registering BME groups and transient renters. This could be even more effective by partnering with community groups who have the knowledge about how and where groups would like to be contacted.
- 5.2 Three roller banners will be produced for use at pop up registration events. One is generic and aimed at all voters. One is aimed at 18-24 year olds to communicate that 3 out of 10 18-24 year olds are not registered and it's important they get their voice heard. The other one is aimed at private renters, communicating that only 63% of private renters are registered to vote compared to 94% of homeowners.

5.3 Following the general election, meetings have been arranged in June with the following organisations to discuss ideas for working together to improve registration rates amongst priority groups and areas:

- Citizens Advice Bureau
- Refugee and Migrant Centre
- Wolverhampton College
- The Way Youth Zone
- Outreach for Wolverhampton
- Private Sector Housing team

5.4 A verbal update will be provided on the outcome of these meetings at Scrutiny Board.

6.0 Financial implications

6.1 The costs of delivering the public engagement strategy will be funded from the £367,000 net budget set aside for Electoral Registration in 2017-18.

[GE/20062017/Q]

7.0 Legal implications

7.1 The public engagement strategy and registration plan have been produced in accordance with the Representation of the People Act 1983. The Electoral Registration Officer has a statutory duty to maximise registration across the city.

[TS/16062017/Q]

8.0 Equalities implications

8.1 There are equality implications in ensuring that every elector has the opportunity to vote. This is a priority for both the Council and the Electoral Commission.

8.2 Particular steps will be taken to maximise accessibility to registering to vote, including:

- Working with community champions to educate groups on eligibility to vote and to promote voter registration.
- Working with community champions to set up pop up events in targeted areas to encourage people to register to vote.
- Video material has been produced in four different languages to explain the voting process to assist voters where English is not their first language.
- Information on elections and the canvass will also go on Wolverhampton Information Network to reach a wider audience and it includes a translation option.
- Establishing a partnership with Citizens Advice Bureau, who come in to regular contact with members of the public.

9.0 Environmental implications

9.1 There are no environmental implications arising from this report.

10.0 Human resources implications

10.1 There are no human resources implications arising from this report.

11.0 Corporate landlord implications

11.1 There are no corporate landlord implications arising from this report.

12.0 Schedule of background papers

2016/17 Public Engagement Strategy and 2016/17 Registration Plan

Public Engagement Strategy

Date:	2017-18
Author:	Laura Noonan
Document version:	0.1

Reviews:			
Name	Role	Date	Sign-off (✓)
Martyn Sargeant	Head of Democratic Services	23-Jun-17	
Keith Ireland	Electoral Registration Officer		

Overview of challenges in area

Although overall registration rates are quite strong (90.3% in 2016), there are a number of areas where the response is lower (worst in Heath Town - 81.6%, and St Peter's - 78.9%). The ERO has identified students, BME communities (and/or areas where levels of English as a first language are lower than usual) and private sector tenants as particular challenges.

Approach to meeting these challenges

The Public Engagement Strategy for 2017/18 marks a fresh start for electoral registration activity, recognising resourcing issues over the past two years have made it difficult to effectively target key groups/areas. The Council has recently appointed a Project Manager on a secondment, and a key area of responsibility will be to improve registration rates across the city and amongst specific under-registered groups in particular. These include:

- working through community groups and Councillors to effectively reach BME groups and residents who do not have English as their first language
- working with the University and city college to improve registration and democratic engagement amongst students
- working with and through private landlords to encourage their tenants to register
- improving engagement with young people, particularly attainees, to encourage registration and engagement with democratic processes
- working with organisations who come in to regular contact with members of the community, to establish partnerships to promote registration

Approach to evaluating activity

The key mechanism to evaluate the effectiveness of different strands of work will be registration rates in target areas (outcome measure) but there will be other output measures that will provide helpful indicators (e.g. attendance at student events, distribution of leaflets and videos in other languages, etc.).

Refining the profile of your registration area - local and national data sources

Source of Data/Information	Information provided	How this data will be used
Census 2011 updated with the 2014 mid-year population estimates [www.wolverhamptoninprofile.org.uk]	Demographic information about city and ward population, particularly in relation to under-registered groups (young adults 16-24, those in private rented accommodation, BME population, those whose first language is not English, students).	Identify locations of key groups (cross-referenced against intelligence from previous canvasses) to inform canvass strategy and priorities.
Mosaic Profiles	Profiles based upon typical characteristics of residents in each postcode. Each postcode area can be grouped into 1 of 15 main groups (and beneath them 66 sub groups)	To identify communication preferences to tailor towards particular groups
Council tax data	Number and location of properties exempt from council tax due to all occupants being students.	Data matching and to identify concentrations of student properties to inform canvass strategy and priorities.
Housing benefits data	Housing benefit recipients.	Identify recipients of housing benefit in order to provide supplementary mailings/advertising about getting registered.
Education data	Number of attainers within city.	To provide a baseline for the number of young people that could be registered.
Internet connectivity study	Low levels of internet connectivity.	To inform canvass strategy, particularly where door-to-door calling will be more important.
Private landlord database (Council's Housing Team)	Details of private landlords.	To facilitate landlords to encourage tenants to register to vote.
2010 canvass	Ward/district level response rates. Response rates using different media (SMS, online, etc.).	To identify areas of poor response in order to inform canvass strategy and target resources appropriately; and to inform canvass strategy and priority response routes.
University of Wolverhampton	Student data.	Data matching and to target non-respondents.
Xpress	Voids data.	Identify properties where no electors currently registered.

Building a profile of your registration area - analysing previous public engagement strategies, registration plans a

Ward/Division	Response data from the 2016 canvass			What other data tells you about these wards (2011 Census and Mosaic profiles)	Groups in this area	Priorities identified	Priority ward?
	Number of properties	Response (no)	Response (%)				
Bilston East	6,437	5,772	89.7%	Above average lone parent households; high level of Council housing; above average unemployment; above average manual trades.	Single person households.	Normal canvass activity, with national publicity.	YES
Bilston North	5,053	4,572	90.5%	Slightly above average social rented - council tenure. High percentage of 'Modest Traditions' (mature homeowners enjoying stable lifestyles). Prefer to be contacted by post.		Normal canvass activity, with national publicity.	
Blakenhall	4,639	4,337	93.5%	High level of BME, esp. Asian; low levels of English as first language; above average social and private rented; above average number of students. High percentage of 'Urban Cohesion' (settled urban communities, strong sense of identity). A high preference for using twitter, being contacted by mobile call and texts.	BME; students; private rented.	Work through community groups and Councilors; partnership with University; private landlord initiative, communication in multiple languages.	YES
Bushbury North	5,278	5,084	96.3%	Above average 75+ and single occupant pensioners. High percentage of 'Aspiring Homemakers' (younger households, recently set up home). High preference for being contacted by social media.		Normal canvass activity, with national publicity.	
Bushbury South and Low Hill	6,404	5,694	88.9%	Above average Afro-Caribbean population; high lone parent households; high level of Council and social housing; high unemployment; above average manual trades.	BME; single person households.	Work through community groups and Councilors.	YES
East Park	5,672	4,911	86.6%	Above average lone person households; high level of Council housing; above average unemployment; above average manual trades.	Single person households.	Normal canvass activity, with national publicity.	YES
Ettingshall	6,171	5,545	89.9%	Above average BME (Asian and Black); low levels of English as first language; above average lone parent households; high levels of Council housing; above average unemployment; above average manual trades. High percentage of 'Transient Renters' (single people, low cost homes for short term). High preference for using social media.	BME; poor English fluency; single person households.	Work through community groups and Councilors.	YES
Fallings Park	5,099	4,528	88.8%	Above average Council housing. High percentage of 'Aspiring Homemakers' (younger households, recently set up home). High preference for being contacted by social media.		Normal canvass activity, with national publicity.	
Graiseley	5,542	5,178	93.4%	High level of BME, esp. Asian; low levels of English as first language; high level of lone person households; high level of private renting; above average unemployment. High percentage of 'Transient Renters' (single people, low cost homes for short term). High preference for using social media.	BME; poor English fluency; single person households; private renting.	Work through community groups and Councilors; private landlord initiative.	YES
Heath Town	6,892	5,627	81.6%	High level of younger people; above average Black population; below average levels of English as first language; high level of lone person households; high level of Council housing; high unemployment; above average student population; above average manual trades. High percentage of 'Transient Renters' (single people, low cost homes for short term). High preference for using social media.	Young people; BME; poor English fluency; single person households; students.	Work through community groups and Councilors; partnership with University.	YES
Merry Hill	5,348	4,866	91.0%	Above average lone pensioner households. High percentage of 'Suburban Stability' (mature couples, supporting older children, comfortable incomes). High preference for being contacted by email and social media. High percentage of 'Senior Security' (older people with assets, comfortable retirement). High preference for being contacted by post or landline.	Single person households.	Normal canvass activity, with national publicity.	
Oxley	5,380	4,998	92.9%	Slightly above average social rented - council tenure. High percentage of 'Aspiring Homemakers' (younger households, recently set up home). High preference for being contacted by social media.		Normal canvass activity, with national publicity.	
Park	5,671	5,329	94.0%	Above average Asian population; low level of English as first language; high level of private rented; above average student population; high level of lone person households. High percentage of 'Domestic Success' (high-earning families, school-age children). High preference for using social media, texts and emails rather than post. High percentage of 'Rental Hubs' and 'Transient Renters' (young people, renting from private landlords, students). High preference for being contacted by social media - using twitter and facebook daily.	BME; poor English fluency; private rented; students; single person households.	Targeted during Canvass & following publication of Feb register.	YES
Penn	5,208	5,047	96.9%	Above average older population; high level of Asian residents. High percentage of 'Domestic Success' (high-earning families, school-age children). High preference for using social media, texts and emails rather than post. High percentage of 'Senior Security' (older people with assets, comfortable retirement). High preference for being contacted by post or landline.	BME.	Work through community groups and Councilors; partnership with University; private landlord initiative.	
Spring Vale	5,181	4,717	91.0%	Above average older population.		Normal canvass activity, with national publicity.	
St Peter's	7,038	5,551	78.9%	High level of younger people; large 'other white' community; large Pakistani community; above average Caribbean population; low levels of English as first language; high level of lone person households; high level of social and private rented; above average unemployment; high level of students; high level of manual trades. High percentage of 'Rental Hubs' (young people, renting from private landlords, students) and 'Transient Renters'. High preference for being contacted by social media - using twitter and facebook daily.	Young people; BME; EU citizens; poor English fluency; single person households; private rented; students.	Work through community groups and Councilors; partnership with University; private landlord initiative. Use of social media to communicate.	YES
Tettenhall Regis	5,158	4,502	87.3%	Above average older population; above average lone pensioner households. High percentage of 'prestige positions' (well-educated, affluent married couples, large family homes) with a high preference for being contacted by post or email. High percentage of 'Senior Security' (older people with assets, comfortable retirement). High preference for being contacted by post or landline.	Single person households.	Normal canvass activity, with national publicity.	
Tettenhall Wightwick	5,386	5,192	96.4%	Above average older population; above average lone pensioner households. High percentage of 'prestige positions' (well-educated, affluent married couples, large family homes) with a high preference for being contacted by post or email. High percentage of 'Senior Security' (older people with assets, comfortable retirement). High preference for being contacted by post or landline.	Single person households.	Normal canvass activity, with national publicity.	
Wednesfield North	5,040	4,767	94.6%	Above average older population; above average lone pensioner households. High percentage of 'Senior Security' (older people with assets, comfortable retirement). High preference for being contacted by post or landline.	Single person households.	Normal canvass activity, with national publicity.	
Wednesfield South	5,261	4,822	91.7%	No identified issues from census. High percentage of 'Senior Security' (older people with assets, comfortable retirement). High preference for being contacted by post or landline.		Normal canvass activity, with national publicity.	
Area wide	111,858	101,039	90.3%				

Building a profile of your registration area - local public engagement priorities and issues

Local priorities - geographical and target groups	Wards (where relevant)	Priority (High/Medium/Low)	Key stakeholders/partners
BME/poor English fluency	Blakenhall, Bushbury South, Ettingshall, Graiseley, Heath Town, Park, Penn, St Peter's.	Medium	Councillors; community groups, Citizens Advice Bureau
Students	Blakenhall, Heath Town, Park, St Peter's.	Medium	University of Wolverhampton; City of Wolverhampton College, The Way Youth Zone
Attainers		Low	Bite the Ballot; Heath Town Academy. Laura King and Julie Jackson from the One Team to provide information on 16 year olds every quarter.
Private rented sector	Blakenhall, Graiseley, Park, St Peter's, Ettingshall, Heath Town.	Medium	Private Landlord team (Housing); private landlords.
Poor internet access	tbc	Low	Customer Services, Communications
Low response rate areas (below 90%)	Bilston East, Bushbury South, East Park, Ettingshall, Fallings Park, Heath Town, St Peter's, Tettenhall Regis	High	

Channels: Direct Contact

Channel	Communication opportunity	Incoming or Outgoing	Activity	Priority addressed / audience reached	Evaluation measures
Direct mail	Canvass literature	Outgoing	Despatch of HEFs (and reminders to non-responding properties), setting out how to register/confirm details.	All properties	Response rates
	Council tax	Outgoing	Registration forms generated following notification of new residents from Council Tax weekly lists.	As relevant	Number sent out; response rates
	Attainers	Outgoing	Letters to students who have turned 16 advising them that they can go on the register as attainers	Students	Registration rates of attainers
Face to face	Electoral Services	Incoming	Verbal advice from core team to personal callers whose queries can't be resolved by Customer Services.	Public	n/a
	Customer Services	Incoming	First point of contact response to routine queries.	Public	Volume of calls; proportion resolved at first point of contact
	Other drop-in services (e.g. libraries, leisure centres, housing, Register Office)	Incoming	Encouragement to residents to complete the registration processes; basic assistance with queries; signposting to further support.	Public	n/a
	University events	Outgoing/incoming	Attendance at University and Student Union events (e.g. Freshers' Week, SU promotion)	Students	Registrations made; registration rates in target areas
	Community groups	Outgoing/incoming	Attendance at community group meetings and/or with community leaders who can act as champions	Ethnic minority residents	Meetings attended; response rates in target areas
	Electoral Services and Community Groups	Outgoing	Pop up registration events in the community e.g. mander shopping centre and targeting key events such as residents week.	Public	Number of people registered at events, feedback from community groups
	Canvassers	Outgoing	Doorstep advice and support for residents.	Public	Number of visits made; response rates
	Canvassers	Outgoing	Provision of information for people whose first language is not English.	Ethnic minority residents	Number of leaflets distributed; response rates in target wards
Telephone	Customer Services	Incoming	First point of contact response to routine queries.	Public	Volume of calls; proportion resolved at first point of contact
	Electoral Services	Incoming	Advice from core team to personal callers whose queries can't be resolved by Customer Services.	Public	n/a
Online/social media	City Direct	Outgoing	General messages about registration to assist employees who are also residents and raise general awareness for frontline staff.	Employees (and public via employees)	n/a
	Website	Outgoing	Provision of advice about registration and the canvass process; banner 'advertising' at key points; signposting for additional support.	Public	Website hits
	Wolverhampton Information Network	Outgoing	Provision of advice about registration and the canvass process that is on the Corporate Website to reach a wider audience.	Public	Website hits
	Facebook/Twitter	Outgoing	Messages to raise awareness at key points (e.g. when HEFs distributed); signposting to online help.	Public	Website hits; retweets
	Facebook/Twitter	Incoming	Responding to social media enquiries.	Public	Volume of enquiries
Via elected representatives	Briefing packs	Incoming enquiries to Councillors	Provision of briefing pack to Councillors to advise about timelines, key deadlines, process and how to signpost people.	Public (via Councillors)	n/a
	Briefing packs	Incoming enquiries to MPs	Copy of briefing pack to MPs; possible briefing meeting	Public (via MPs' offices)	n/a

Channels: Local partners

Organisation	Details	Activity	Audience reached	Lessons learned from previous experience of working with this partner	Evaluation opportunities
University of Wolverhampton	Students' Union; Dean of Students - Jon Elsmore	Embed voter registration in to the online student registration process, and establish a data sharing agreement. Use of University buildings as polling station and attendance at Freshers' Fair and other events to promote registration	Students	Students' Union struggles to generate interest.	Student registration rates
City of Wolverhampton College	Students' Union. Student Services - Rose Urkovskis	Attendance at key events to promote registration.	Students	n/a	Student registration rates
Community groups	Refugee and Migrant Centre, Aspiring Futures, Ethnic Minority Council, Breaking Boundaries, Nissa Womens Support Group.	Meet with community groups and/or communicate through Councillors to develop understanding and possibly identify community champions who can help others.	Ethnic minorities	n/a	Registration rates in target areas
Citizens Advice Bureau			Public	n/a	Feedback from partner
Bite the Ballot	Contact: Jessica Davis	Working with secondary schools as part of BtB's regional initiative to encourage registration and participation amongst young people.	Attainers	Quality of completed forms is often very poor.	Number of registered attainers
Heath Park Academy		Pilot support for school's citizenship programme (introduction to democracy and local decision-making) and involvement of Yr 12/13 students in election.	Attainers	n/a	Review of pilot to see how it could be expanded within the school and into other schools
The Way Youth Zone	Phil Marsh, Youth Work Manager		Students	n/a	Number of registered attainers/student registration rates, feedback from The Way
Care Leavers' Forum	Representative group for those who have recently left care	Involvement of young people in the election (at count or on polling stations) to develop understanding of democratic process and, as part of Council's corporate parenting responsibility, to help them develop life skills.	Young care leavers	n/a	Feedback from participants
Secondary schools	Via Education Directorate	Mailout to attainers in latter stage of canvass to target non-registrants.	Attainers/young people	n/a	Number of registered attainers
Private landlords	Via Private Landlord Team	Reminders for landlords that tenants are required to register to vote (through letters, license documentation, etc.). Investigate possibility of including information in the 'check before you rent' app. Include 'requirement' as a licensing prompt (not enforceable)	Tenants (via private landlords)	n/a	Registration rates in target areas
Outreach for Wolverhampton and the Night Shelter	Contact: Neil Amison	To raise awareness and support homeless people to register to vote by making a declaration of local connection	Homeless	n/a	Registration rates through declaration of local connection

Channels: Media and Advertising

Digital Channels	Activity	Audience reached and priorities met	Lessons learned from using this media channel	Evaluation opportunities
See 3a				
PR/Media				
Councillor newsletters	To provide information, key dates, etc. in relation to the canvass.	General audience		Limited
Paid advertising channels				
Via social media (e.g. Facebook)	Targeted advertising using segmented [Mosaic] data to reach specific communities (e.g. BME, under 30s, etc.).	BME and low levels of English fluency; students and under 30s; <u>private renters</u> .		Click through rates from advertising; response rates in target areas.
TBC: local general advertising (if deemed to be required)	Bus shelters, tram stops, bus tickets	General audience	Unable to target specific communities	

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Scrutiny Board

4 July 2017

Report title	Information Governance Performance Report – Quarter Four 2016/17	
Cabinet member with lead responsibility	Councillor Milkinderpal Jaspal Governance	
Wards affected	All	
Accountable director	Kevin O’Keefe, Governance	
Originating service	Democracy	
Accountable employee(s)	Anna Zollino-Biscotti	Information Governance Manager 01902 555166 anna.zollino-biscotti@wolverhampton.gov.uk
Report to be/has been considered by	Cabinet Performance Management Panel	12 June 2017
	Information Governance Board	21 June 2017

Recommendation(s) for action or decision:

The Scrutiny Board is recommended to:

1. Review and comment on the quarter four performance for Information Governance (IG)
2. Identify and feedback any further action that may be necessary.
3. To note the IG performance figures for 2016/2017 for Freedom of Information (FOI)/Environmental Information (EIR) requests and Subject Access requests (SAR).
4. To note the year on year performance figures for both regimes.
5. To note the FOI/EIR and SAR performance for the calendar year 2016, in comparison with regional local authorities.
6. To note the progress that is being made in relation to the new General Data Protection Regulation (GDPR) and consider receiving quarterly progress reports on this matter.

1.0 Purpose

- 1.1 To report on the performance of Information Governance for quarter four (January – March 2017).

2.0 Background

- 2.1 The Information Commissioner's Office (ICO) conducted consensual audits of the Council in October 2011 and July 2012.
- 2.2 The October 2011 audit covered requests for personal data and requests made under the Freedom of Information Act 2000 (FOI). The ICO's subsequent overall opinion was that there was a very limited assurance that processes and procedures were in place and being adhered to.
- 2.3 The ICO carried out a further audit on 19 July 2012 to measure the extent to which the City of Wolverhampton Council had implemented the agreed recommendations and identify any subsequent change to the level of assurance previously given. This was based on an update provided in March 2012 and subsequent management information. The ICO raised the Council's status from Red "Very Limited Assurance" to Amber "Limited Assurance" as an acknowledgement that progress had been made.
- 2.4 The Council provided a final management update to the ICO on 20 December 2012, after which the ICO confirmed that the audit process had been brought to a conclusion. Throughout 2013, work continued to ensure that a strategic approach was adopted to how the Council managed information assets.
- 2.5 In February 2014, the ICO had asked for further updates on our progress, as a result of information incidents the Council was managing. The Council was then placed under an enforcement notice to achieve 100 % of employees having undertaken the mandatory 'protecting information training'.
- 2.6 In June 2014, the Council complied with the enforcement notice and achieved 100 % of employees completing the 'protecting information' training.
- 2.7 In June 2016, as a result of an information incident, the Council signed a written undertaking with the ICO to ensure that all staff handling personal data receive data protection training and that it is refreshed at regular intervals not exceeding two years. In addition, the Council was also required to devise and implement a system to monitor training.
- 2.8 In March 2017, the Council complied with the requirements of the written undertaking and achieved 100% of employees completing the mandatory "protecting information" training and demonstrated that it had implemented a system to monitor training.
- 2.9 In order to ensure on-going improvements with information governance this report outlines current performance.

3.0 Progress/Update

- 3.1 **IG Performance** - The IG performance figures for quarter four are contained in **Appendix A**.
- 3.2 318 requests were received for Freedom of Information /Environmental Information (FOI/EI) which is 42 more than those received in quarter three. All requests were responded to within the statutory 20 day timeframe, which equates to a 100 % response rate.
- 3.3 79 requests were received for Data Protection which is two less than the numbers received last quarter. All requests, with the exception of one request, were responded to within the statutory 40 day timeframe. This equates to a 99 % response rate for the quarter.
- 3.4 The number of information incidents reported for the quarter has increased. 22 incidents were reported this quarter, which is four more than the number reported in quarter three. Similar to the last quarter, 18 of the 22 incidents reported (82 %) were of the incident type "Disclosed in error".
- 3.5 There were 79 new starters in quarter four whose role requires them to deal with personal data on a regular basis; this is lower than the number who joined the council in quarter three. Out of this number, 44 completed the mandatory protecting information module, which only equates to 56 %.
- 3.6 A summary of the performance figures for both FOI/EI requests and Data Protection Requests for the year 2016/2017 are contained in **Appendix B**.
- 3.7 The first two graphs show the volumes of information requests received for both regimes for the year. In summary, the volume of FOI/EIR requests remained static for the first two quarters of the year; however, a steady increase can be seen in quarters three and four. This is the opposite to the volumes received for SAR requests, with volumes decreasing between quarter one and two and then almost remaining on a plateau in quarters three and four.
- 3.8 The last graph titled "FOI/EIR and SAR year on year" also shows the volumes of information requests received into the Council year on year since 2010/2011 (FOI/EIR requests) and 2014/2015 (SAR). **Please note that performance figures for subject access requests (SAR) were not recorded centrally prior to 2014.**
- 3.9 In summary, the graph shows that the numbers of FOI/EIR requests received into the Council peaked in 2014/15. The number of requests received for this 2016/17, are again lower than the previous year – thus showing a downward trend in volumes for the last two years.

- 3.10 The same pattern is also evident in relation to the volumes of SAR requests received; as again fewer requests have been received than last year which again replicates the downward trend in volumes as per FOI/EIR requests.
- 3.11 In terms of performance, the graph shows that for both FOI/EIR and SAR requests, our response rate has continued to increase. In general, FOI/EIR performance has steadily increased from a response rate of 71 % recorded for 2010/11 to 99.63 % achieved this year. Similarly, the response rate for SAR requests has also increased from 82 % in 2014 to 99 % this year.
- 3.12 **Appendix C** shows how we compare with two of our neighbouring local authorities; Birmingham City Council and Dudley Metropolitan Borough Council. The graph shows the total number of information requests received in each council for FOI/EIR and SAR for the calendar year January to December 2016, and also shows the average percentage response rate for responding to requests within the statutory timeframes of both regimes. **Please note that seven local authorities were contacted, out of which three responded. Only two authorities provided figures that could be used in a comparable context.**
- 3.13 **General Data Protection Regulations (GDPR)** – On 14 April 2016, the EU Parliament approved the General Data Protection Regulation. The following month, it was published in the Official Journal of the European Union which means it will be directly applicable throughout EU member states without the need for implementing further legislation from 25 May 2018. In October 2016, the Government confirmed that it will implement the GDPR in the UK.
- 3.14 The Information Governance (IG) team have for the last nine months collaborated with other local authorities and public bodies who form part of the West Midlands Regional IG Forum to work through the changes and implications that the new regulation will bring.
- 3.15 In addition, the IG team have carried out an initial review of the Council's current status against future requirements and this has been translated into an action plan that the team is working to with the cooperation of service teams and departments within the Council.
- 3.16 Both the Information Governance Board and Senior Executive Board (SEB) have been briefed regarding the GDPR requirements. Quarterly progress reports will continue to be submitted to both boards for the next 12 months until the regulation comes into force and the programme of work comes to an end.
- 3.17 Adherence to and implementation of the GDPR work programme will assist the Council in meeting the requirements of the new regulation and will ensure that ongoing compliance to data protection legislation is maintained.

4.0 Financial implications

- 4.1 There are no financial implications associated with the recommendation in this report as Councillors are requested to review the progress made on information governance.
- 4.2 It is worth noting, however, that a failure to effectively manage information governance carries a financial risk. Inaccurate and out of date information can lead to poor decision making and a potential waste of financial resources. In addition to this, poor information governance can actually result in a fine of up to £500,000 per breach from the ICO.
[GE/19062017/Z]

5.0 Legal implications

- 5.1 The Council has a legal duty under the Data Protection Act 1998, Freedom of Information Act 2000 and Environmental Information Regulations 2004 to appropriately manage and protect information assets.
- 5.2 The integration of Public Health into the Council in April 2012 required the Council to provide assurance to the NHS that it had in place suitable information governance policies, procedures and processes. The Council makes an annual submission of the NHS IG Toolkit which continues to provide such assurances in relation to the safeguarding of personal sensitive, health and social care, data.
- 5.3 Failure to effectively manage information governance could increase risk of exposure to fraud and malicious acts, reputational damage, an inability to recover from major incidents and potential harm to individuals or groups due to inappropriate disclosure of information.
- 5.4 The Information Commissioner has the legal authority to:
- Fine organisations up to £500,000 per breach of the Data Protection Act or Privacy & Electronic Communication Regulations
 - Conduct assessments to check organisations are complying with the Act
 - Serve Enforcement Notices and 'stop now' orders where there has been a breach of the Act, requiring organisations to take (or refrain from taking) specified steps in order to ensure they comply with the law
 - Prosecute those who commit criminal offences under Section 55 of the Act
 - Conduct audits to assess whether organisations processing of personal data follows good practice
 - Report issues of concern to Parliament.
- [TS/19062017/Q]

6.0 Equalities implications

- 6.1 There are no equality implications arising from this report and its recommendations.

6.2 All policies and procedures developed as part of the information governance maturity model will undergo an equalities analysis screen and full analysis if appropriate.

7.0 Environmental implications

7.1 There are no environmental implications arising from this report.

8.0 Human resources implications

8.1 All employees are required to comply with Information Governance legislation and are required to complete the mandatory 'protecting information training'.

9.0 Corporate landlord implications

9.1 There are no corporate landlord implications arising from this report.

10.0 Schedule of background papers

10.1 Update on Information Governance report to Cabinet – 26 March 2014.

Information Governance Summary Quarter Four - 2016/2017

Freedom of Information (FOI) requests received by Directorate Q4 2016/2017

FOIs by Directorate	January		February		March	
	Total	%	Total	%	Total	%
Corporate	44	100%	42	100%	36	100%
Education	5	100%	11	100%	8	100%
Housing	4	100%	1	100%	8	100%
People	22	100%	18	100%	25	100%
Place	36	100%	20	100%	33	100%
WMPF	3	100%	0	100%	2	100%
BC Transport	0		0		0	
WM Transport	0		0		0	
Overall	114	100%	92	100%	112	100%

Training Q4 2016/2017

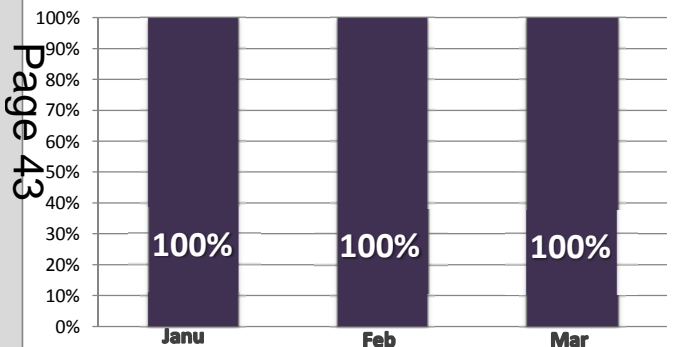
New Starters
79

44 - completed 56%
35 - not completed 44%

Data Protection (DP) requests received by Directorate Q4 - 2016/2017

DPs Directorate	January		February		March	
	Total	%	Total	%	Total	%
Corporate	11	100%	18	100%	15	100%
Education	3	100%	0		0	
Housing	0		0		0	
People	5	100%	0		6	100%
Place	8	100%	6	100%	6	100%
WMPF	0		0		1	0%
BC Transport	0		0		0	
WM Transport	0		0		0	
Overall	27	100%	24	100%	28	99%

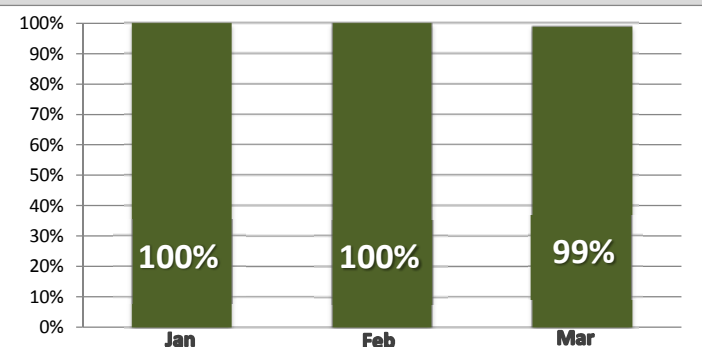
Freedom of Information (FOI) Response Rates Q4



Information Incidents Q4



Data Protection Request (DP) Response Rates Q4



Quarter 4
2016/17

100%

FOI Response Rate

cumulative
to date
2016/17

99.91%

Quarter 4
2016/17

98.73%

DP Response Rate

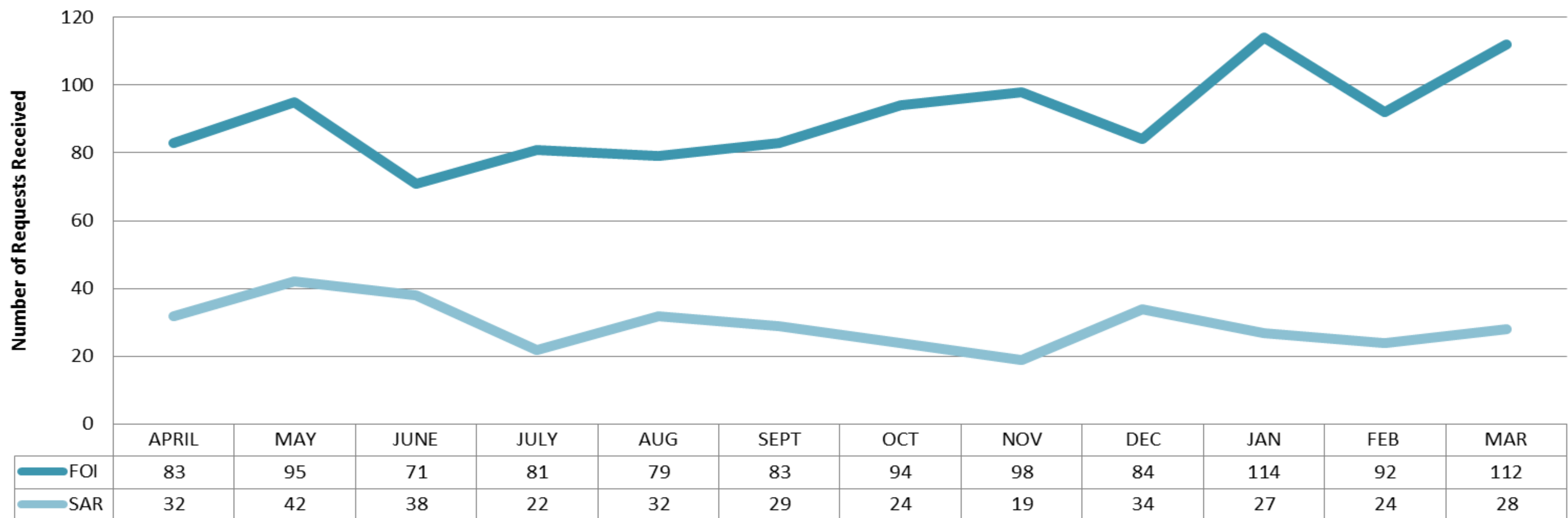
cumulative
to date
2016/17

99.43%

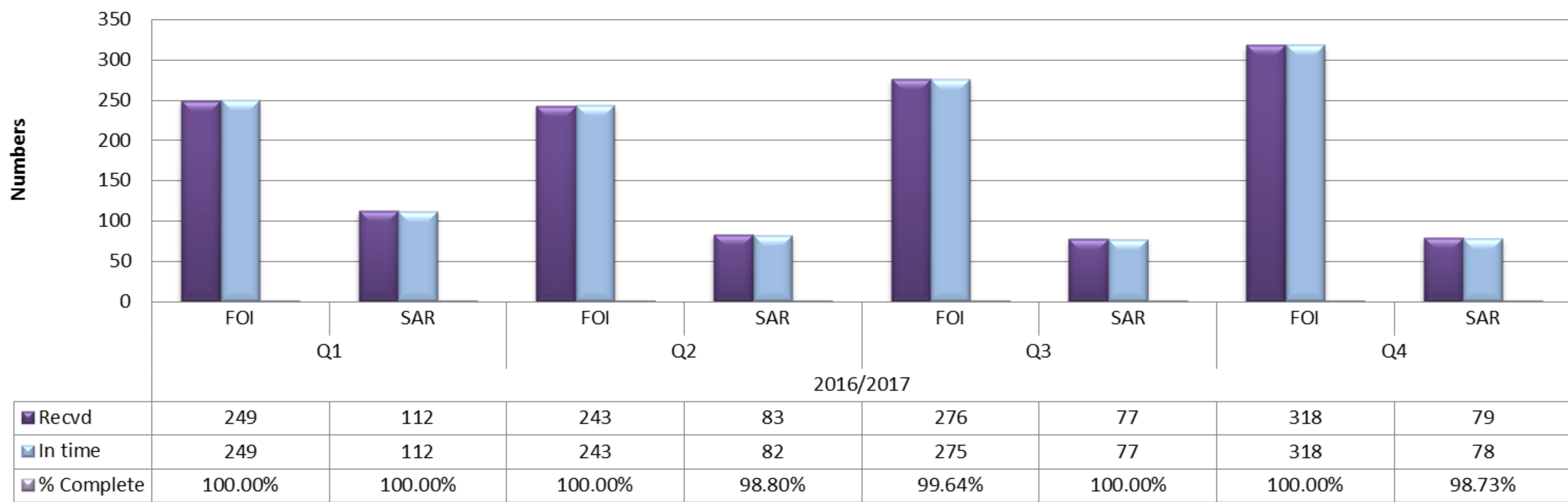
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Appendix B -

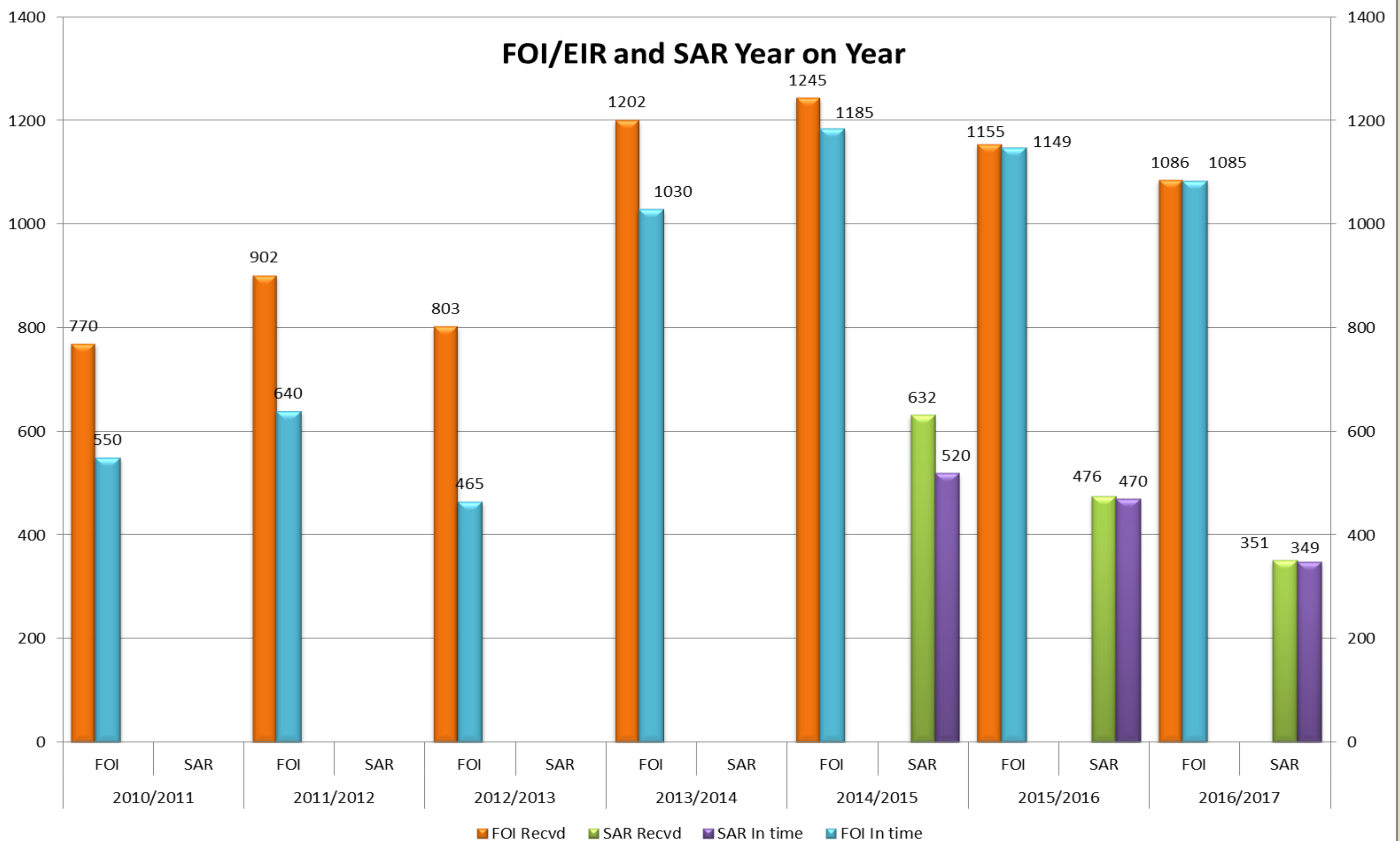
FOI and SAR requests received month by month - 2016/2017



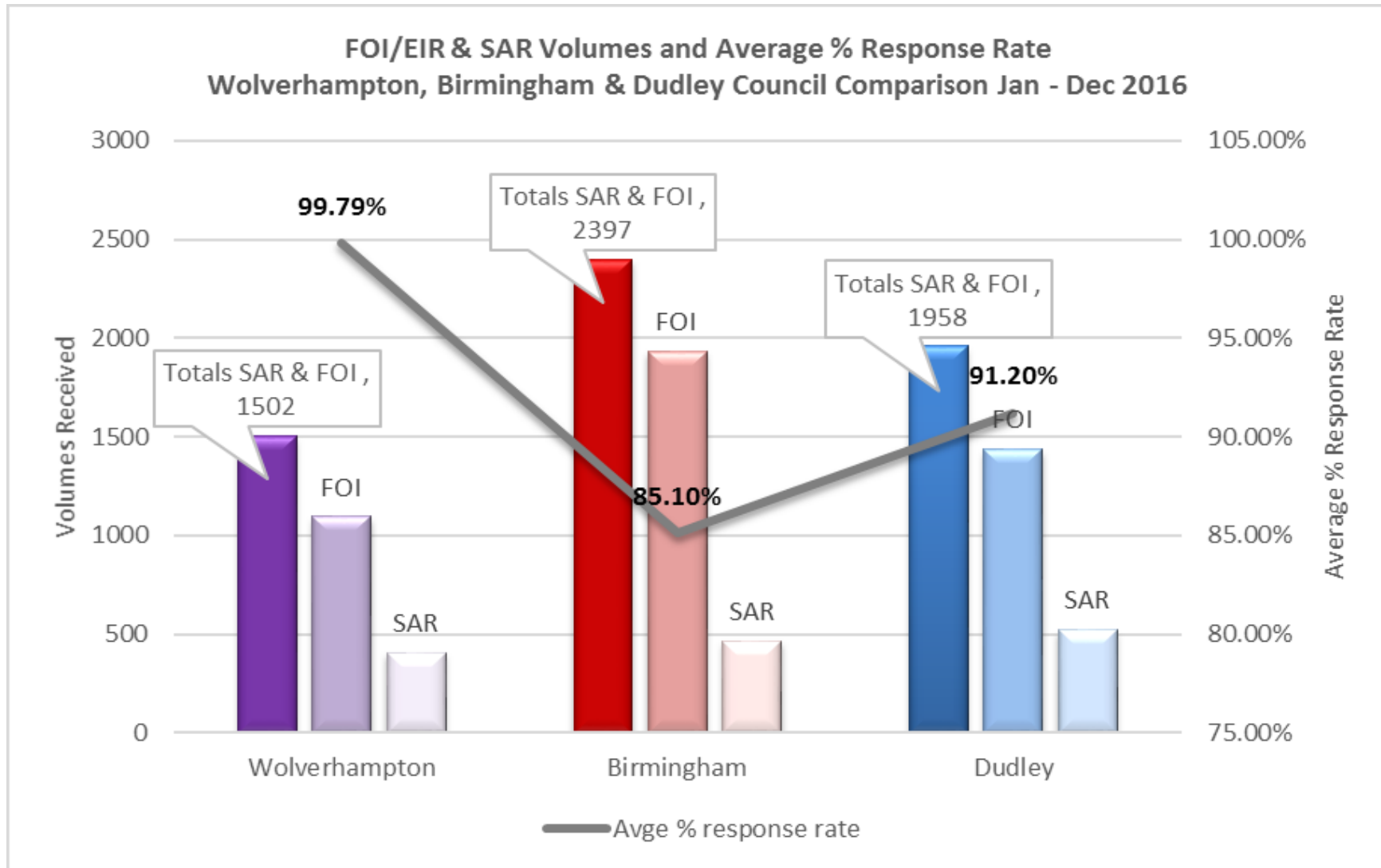
FOI and SAR requests received & completed within statutory timeframes - 2016/2017



FOI/EIR and SAR Year on Year



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