

Notice of meeting and agenda

Corporate Policy and Strategy Committee

10.00am, Tuesday, 30 September 2014

Dean of Guild Court Room, City Chambers, High Street, Edinburgh

This is a public meeting and members of the public are welcome to attend

Contact

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1. Order of business

- 1.1 Including any notices of motion and any other items of business submitted as urgent for consideration at the meeting.

2. Declaration of interests

- 2.1 Members should declare any financial and non-financial interests they have in the items of business for consideration, identifying the relevant agenda item and the nature of their interest.

3. Deputations

- 3.1 If any

4. Minutes

- 4.1 Minute of the Corporate Policy and Strategy Committee of 2 September 2014 – submitted for approval as a correct record.

5. Forward planning

- 5.1 Corporate Policy and Strategy Committee Key Decisions Forward Plan November 2014 to January 2015 (circulated)
- 5.2 Corporate Policy and Strategy Committee Rolling Actions Log (circulated)

6. Business Bulletin

None

7. Executive decisions

- 7.1 Welfare Reform – Update – report by the Director of Corporate Governance (circulated)
- 7.2 Strategic Response to Welfare Reform in Edinburgh – report by the Director of Corporate Governance (circulated)
- 7.3 Corporate Debt Policy – Annual Update – report by the Director of Corporate Governance (circulated)
- 7.4 Information Governance Policies – report by the Director of Corporate Governance (circulated)
- 7.5 2014 Employee Survey: Results and Next Steps - report by the Director of Corporate Governance (circulated)

- 7.6 Learning in Partnership: Policy for Student Placements in Health and Social Care and Children and Families – joint report by the Directors of Children and Families and Health and Social Care (circulated)
- 7.7 BOLD Portfolio Update – report by the Chief Executive (circulated)
- 7.8 Finance and Resources Policy Development and Review Sub-Committee Work Programme August 2014 – January 2015 – referral from the Finance and Resources Committee (circulated)

8. Routine decisions

- 8.1 Integrated Children’s Services – referral from the Education, Children and Families Committee (circulated)

9. Motions

None

Carol Campbell

Head of Legal, Risk and Compliance

Committee Members

Councillors Burns (Convener), Cardownie (Vice-Convener), Burgess, Chapman, Child, Nick Cook, Edie, Godzik, Ricky Henderson, Hinds, Lewis, Mowat, Rankin, Rose and Ross.

Information about the Corporate Policy and Strategy Committee

The Corporate Policy and Strategy consists of 15 Councillors and is appointed by the City of Edinburgh Council. The Corporate Policy and Strategy Committee usually meet every four weeks.

The Corporate Policy and Strategy Committee usually meet in the Dean of Guild Court Room in the City Chambers on the High Street in Edinburgh. There is a seated public gallery and the meeting is open to all members of the public.

Further information

If you have any questions about the agenda or meeting arrangements, please contact Louise Williamson, Committee Services, City of Edinburgh Council, Business Centre 2.1, Waverley Court, 4 East Market Street, Edinburgh EH8 8BG, Tel 0131 529 4264, e-mail louise.p.williamson@edinburgh.gov.uk .

A copy of the agenda and papers for this meeting will be available for inspection prior to the meeting at the main reception office, City Chambers, High Street, Edinburgh.

The agenda, minutes and public reports for this meeting and all the main Council committees can be viewed online by going to www.edinburgh.gov.uk/cpol.

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Corporate Policy and Strategy Committee

10.00 am, Tuesday, 2 September 2014

Present

Councillors Burns (Convener), Cardownie (Vice-Convener), Booth (substituting for Councillor Chapman), Burgess, Child, Nick Cook, Edie, Godzik, Ricky Henderson, Hinds, Lewis, Mowat, Rankin, Rose and Ross.

1. Managing Retirement Policy and Death in Service Benefit Scheme

a) Unison and Unite – Deputation

The deputation expressed concern at the proposals in the Managing Retirement Policy which they felt would lead to a reduction of staff terms and conditions which would affect the lowest paid staff members and may have a knock on effect for the services which they provided. The deputation asked the Committee to continue consideration of the Managing Retirement Policy for further consultation to be carried out on the proposals.

b) Report by the Director of Corporate Governance

Details were provided on the Managing Retirement Policy which covered retirement, flexible retirement and early payment of pension together with the outcome of a review which had been carried out on the Council's Death Benefit Scheme.

The current Death in Service Benefit Scheme resulted in a payment of £3,000 to the estate of an employee who died in service and it was recommended that this be raised to £4,000.

Decision

- 1) To refer the report to the Finance and Resources Committee for approval of the proposal to increase the Death in Service payment to £4,000.
- 2) To continue consideration of the remainder of the report by the Director of Corporate Governance to the meeting of the Committee on 4 November 2014 to enable the Director to report further on the issues raised by members.

(Reference - report by the Director of Corporate Governance, submitted)

2. Lord Provost Visit to Qatar

a) Unison - Deputation

The deputation expressed concern at the proposal for the Lord Provost to visit Qatar in view of the human rights record of Qatar and in particular those concerning labour laws and practices which had led to the death or grievous harm to workers. They indicated that these laws had been highly criticised by organisations such as The United Nations, the International trade union Confederation and Amnesty International

The deputation asked that the Lord Provost's invitation be declined.

b) Report by the Director of Corporate Governance

Details were provided on an invitation which had been extended by the Chief Executive Officer of Qatar airways for the Lord Provost to visit Qatar from 28 September to 1 October 2014.

Motion

- 1) To accept the invitation from Qatar Airways and approve the Lord Provost's visit to Qatar, the Lord Provost to be accompanied by a City Officer and permission granted to take the civic chain.
- 2) To request that the written representation by Unison presented at committee be provided to the Lord Provost, to ensure its delivery to the Qatari authorities.

- moved by Councillor Burns, seconded by Councillor Cardownie

Amendment 1

To accept the invitation from Qatar Airways and approve the Lord Provost's visit to Qatar, the Lord Provost to be accompanied by a City Officer and permission granted to take the civic chain.

- moved by Councillor Rose, seconded by Councillor Mowat

Amendment 2

To take no action on the invitation.

- moved by Councillor Edie, seconded by Councillor Burgess

The Convener ruled that a first vote be taken for or against Amendment 2 and that if it were carried, that would be the end of the matter, but if it were not carried, a second vote be taken between the Motion and Amendment 1.

Voting

In the first vote the voting was as follows:

For Amendment 2	-	3 votes
Against Amendment 2	-	12 votes

In the second vote the voting was as follows:

For the Motion	-	9 votes
For Amendment 1	-	3 votes

Decision

To approve the motion by Councillor Burns.

(Reference - report by the Director of Corporate Governance, submitted)

3. Minute

Decision

To approve the minute of the Corporate Policy and Strategy Committee of 5 August 2014 as a correct record.

4. Corporate Policy and Strategy Committee Key Decisions Forward Plan September to December 2014

The Corporate Policy and Strategy Committee Key Decisions Forward Plan for September to December 2014 was presented.

Decision

To note the Key Decisions Forward Plan for September to December 2014.

(Reference – Key Decisions Forward Plan for September to December 2014, submitted.)

5. Corporate Policy and Strategy Committee Rolling Actions Log

Details were provided of the outstanding actions arising from decisions taken by the Committee.

Decision

To note the Rolling Actions Log.

(Reference – Rolling Actions Log, submitted.)

6 Chief Social Work Officer Annual Report 2013-2014

The Chief Social Work Officer's Annual Report for 2013/2014 was presented. Details were provided on the new format which was intended to help information sharing and benchmarking across services regarding good social work practice and improvement activity.

Decision

- 1) To note the Chief Social Work Officer's Annual Report for 2013/14.
- 2) To note that the figure of £2.2m on page 16 of the report should read £221.28m for the annual cost of alcohol-related harm in Edinburgh with the breakdown as follows:

Health Service: £23.46m

Social Care: £29.91m

Crime: £82.21m

Productive Capacity: £85.70m.

- 3) To note that the figure of £455 per head was reached by dividing the total cost by their figures for Edinburgh's population.

(References – report by the Chief Social Work Officer, submitted)

Declaration of Interests

Councillor Edie declared a financial interest in the above item as Chair of the Care Inspectorate and left the meeting during the Committee's consideration.

7 Public Protection in Edinburgh Annual Reports 2013-2014

Annual reports were presented for each of the five committees/partnerships that together oversaw the main multi-agency public protection activity in the city. These were:

- The Edinburgh Child Protection Committee
- The Edinburgh Adult Support and Protection Committee
- The Edinburgh Offender Management Committee
- The Edinburgh Drug and Alcohol Partnership
- The Violence Against Women Partnership

Decision

- 1) To note the annual reports from each of the public protection Committees.
- 2) To note the importance of ensuring an integrated approach across the Council and between the Council and its key partners NHS Lothian, Police Scotland, the Scottish Fire and Rescue Service and voluntary sector organisations, to allow for effective, shared prioritisation for resource allocation.
- 3) To approve the Forced Marriage Policy and Practice Guidelines as detailed in Appendix 7 to the joint report by the Chief Executive and the Chief Social Work Officer.

(References – joint report by the Chief Executive and the Chief Social Work Officer, submitted.)

Declaration of Interests

Councillor Edie declared a financial interest in the above item as Chair of the Care Inspectorate and left the meeting during the Committee's consideration.

8 Economy Policy Development and Review Sub-Committee Work Programme August 2014 – June 2015 – referral from the Economy Committee

The work programme for the Policy Development and Review Sub-Committee of the Economy Committee was presented.

Decision

To note the Economy Policy Development and Review Sub-Committee Work Programme for August 2014 – January 15.

(References – Economy Committee 19 August 2014 (item 9); referral report from the Economy Committee, submitted.).

Corporate Policy and Strategy Committee

November 2014 to January 2015

Item	Key decisions	Expected date of decision	Wards affected	Director and lead officer	Coalition pledges and Council outcomes
1.	Management of Asbestos	4 Nov 2014		Director: Alastair Maclean Lead officer: Linda Holden, Interim Head of Organisational Development linda.holden@edinburgh.gov.uk Dennis Henderson, Senior Health and Safety Adviser dennis.henderson@edinburgh.gov.uk	CO24-26
2.	ICT Acceptable Use Policy – Review	4 Nov 2014		Director: Alastair Maclean	CO24-26
3.	Corporate Resilience Annual Report (1 October 2013 to 30 September 2014)	4 Nov 2014		Director: Alastair Maclean Mary-Ellen Lang, Corporate Resilience Manager mary-ellen.lang@edinburgh.gov.uk	CO24-26

Item	Key decisions	Expected date of decision	Wards affected	Director and lead officer	Coalition pledges and Council outcomes
4.	Staff Survey - Actions Agreed	4 Nov 2014		Director: Alastair Maclean Lead officer: Davina Fereday, Corporate Manager davina.fereday@edinburgh.gov.uk	CO24-26
5.	Contact in the Capital – Community Communication Pilots	4 Nov 2014		Director: Alastair Maclean Lead officer: Lesley McPherson, Chief Communications Officer lesley.mcpherson@edinburgh.gov.uk	CO24-26
6.	Local Development Plan Action Plan	4 Nov 2014		Director: John Bury Lead officer: David Leslie, Acting Head of Building and Planning Standards david.leslie@edinburgh.gov.uk	CO24-26
7.	Biodiversity Duty Reporting	4 Nov 2014		Director: John Bury Lead officer: David Leslie, Acting Head of Building and Planning Standards david.leslie@edinburgh.gov.uk	CO24-26
8.	Managing Retirement Policy and Death in Services Benefit Scheme	4 Nov 2014		Director: Alastair Maclean Lead officer: Cristine Livingstone, Employment Law and HR Manager cristine.livingstone@edinburgh.gov.uk	CO24-26

Item	Key decisions	Expected date of decision	Wards affected	Director and lead officer	Coalition pledges and Council outcomes
9.	Scotland's Climate Change Declaration 6 th Annual Report	4 Nov 2014		Director: Alastair Maclean Lead office: Jenny Fausset, Senior Corporate Policy and Strategy Officer jenny.fausset@edinburgh.gov.uk	CO24-26
10.	Carbon Management Plan 2014-2020	4 Nov 2014		Director: Alastair Maclean Lead office: Jenny Fausset, Senior Corporate Policy and Strategy Officer jenny.fausset@edinburgh.gov.uk	CO24-26
11.	Edinburgh's Christmas and Edinburgh's Hogmanay 2013-14 Update	2 Dec 2014		Director: Alastair Maclean Lead officer: Lynne Halfpenny, Head of Culture and Sport lynne.halfpenny@edinburgh.gov.uk	CO24-26
12.	Update on Meadowbank	2 Dec 2014		Director: Alastair Maclean Lead office: Stephanie-Anne Harris, Strategic Development Manager stephane-anne.harris@edinburgh.gov.uk	CO24-26
13.	Core Festival and Events Programme 2015	2 Dec 2014		Director: Alastair Maclean Lead office: Joanne Lennon, Business and Performance Manager joanne.lennon@edinburgh.gov.uk	CO24-26

Item	Key decisions	Expected date of decision	Wards affected	Director and lead officer	Coalition pledges and Council outcomes
14.	Welfare Reform	20 Jan 2015		Director: Alastair Maclean Lead officer: Danny Gallacher, Head of Customer Services danny.gallacher@edinburgh.gov.uk	CO24-26

Corporate Policy and Strategy Committee

30 September 2014

No	Date	Report Title	Action	Action Owner	Expected completion date	Actual completion date	Comments
1	06-11-12	The Future Management and Ownership of Easter Craiglockhart Hill Local Nature Reserve (LNR) – motion by Councillor Burns (Agenda for 6 November 2012)	To provide information on the possibility of community ownership and management of the woodland and open space in the area in the longer term and how this might be achieved, with ownership transferring to the Council as an interim measure, with a view to the eventual transfer of ownership and management, to a community organisation.	Directors of Corporate Governance and Services for Communities	Within 4 cycles		Was dependant on Craighouse development decision which was agreed at Planning hearing of 3 September 2014. Awaiting confirmation of planning conditions pertaining to open space ownership and management. A report will be forthcoming, date yet to be agreed as awaiting detail on planning

No	Date	Report Title	Action	Action Owner	Expected completion date	Actual completion date	Comments
							matters as above.
2	22-01-13	Policy Development and Review Sub-Committee Work Programmes	To ask the Director of Children and Families to report back to the Education, Children and Families Policy Development and Review Sub-Committee on developing the Estates Strategy review.	Director of Children and Families	Not specified		Ongoing – Reports to Education, Children and Families Committee on 8 October 2013, and 4 March and 20 May 2014. Further report scheduled for 9 December 2014
3	22-01-13	Welfare Reform - Further Update	To ask the Director to provide members with update briefings on a regular basis.	Director of Corporate Governance	Ongoing		Bi monthly updates to the Committee.
4	05-11-13	Contact in the Capital - Community Communication Pilot	To receive a full report, evaluating the success of the three pilots, in 12-months	Director of Corporate Governance	November 2014		

No	Date	Report Title	Action	Action Owner	Expected completion date	Actual completion date	Comments
5	05-11-13	Contact in the Capital - Community Communication Pilot	<p>To agree that an additional update report, highlighting (city-wide) successful community based communications initiatives, be reported annually.</p> <p>That report to include the possible use of funding to Community Councils/Neighbourhood Partnerships to encourage better communication. The report also to include investigation of reinvigorating the MyEdinburgh website.</p>	Director of Corporate Governance	Annual		
6	05-11-13	Review of Community and Accessible Transport Programme Update	To note that a further update report would be provided in six months.	Director of Health and Social Care	May 2014		
7	21-01-14	Sex Work in Edinburgh - Harm	To note that officers would submit a progress report in	Chief Social Work Officer	March 2015		No change to reporting time

No	Date	Report Title	Action	Action Owner	Expected completion date	Actual completion date	Comments
		Reduction Framework	March 2015 to the Health, Social Care and Housing Committee.				
8	21-01-14	Energy Services Companies	To note the progress towards the development of Energy Services Companies and that a further report would be submitted to Committee in April 2014 and to ask that the progress report include the options for an Energy Services Company that by providing energy and energy services, could generate this sort of significant revenue for the Council.	Director of Economic Development	April 2014		Scheduled for Full Council 25 September 2014
9	25-02-14	Poverty and Inequality Data in the City - referral from the Communities and Neighbourhoods	To instruct that the future report include an assessment of earlier poverty initiatives and clarification of the definitions of "low-				

No	Date	Report Title	Action	Action Owner	Expected completion date	Actual completion date	Comments
		Committee	pay/poverty”.				
10	25-03-14	Riddle's Court and 4-6 Victoria Terrace, Edinburgh	To request officers to report to the relevant committee on the most appropriate mechanism to allow the resources currently allocated to SHBT to be realigned to 6VT to support the cost of capital fit out and rent of their new premises.	Director of Services for Communities	Not specified		There are ongoing discussions taking place with various parties to identify and enable the realignment of funding. Further Riddles Court and Victoria Terrace reports will go to the Economy Committee and thereafter F&R. It is envisaged that Full Council approval will also be required prior to project conclusion. This will be part of the mechanism / process which will enable full funding realignment.

No	Date	Report Title	Action	Action Owner	Expected completion date	Actual completion date	Comments
11	25-03-14	Contact in the Capital - Community Communication Pilots Update	To note that the proposed pilot scheme within the Gorgie/Dalry area would be put on hold at this time and following further consideration an update report would be presented to Committee at a later date	Director of Corporate Governance	Not specified		
12	05.08.14	Edinburgh's Christmas and Edinburgh's Hogmanay 2013-14 Event Update	To agree that a further report be submitted by December 2014 on Performance outcomes	Director of Corporate Governance	December 2014		
13	02.09.14	Managing Retirement Policy and Death in Service Benefit Scheme	<ol style="list-style-type: none"> 1) To agree recommendation 3 in the report 2) To continue consideration of the remainder of the report to the meeting of the Committee on 4 November 2014 to enable the Director 	Director of Corporate Governance	4 November 2014		

No	Date	Report Title	Action	Action Owner	Expected completion date	Actual completion date	Comments
			of Corporate Governance to report further on issues raised by members.				

Corporate Policy and Strategy Committee

10.00am, Tuesday 30 September 2014

Welfare Reform - Update

Item number 7.1
Report number
Executive/routine
Wards

Executive summary

The Council continues to engage with tenants providing advice and financial support through Discretionary Housing Payments.

Applications for Crisis Grants continue to be considered for high priority cases only and Community Care Grants for medium and high priorities.

The Scottish Government has now confirmed that Edinburgh has been allocated an additional £687,102 to fully mitigate Under Occupancy for 2014/15. This has increased our Discretionary Housing Payment fund to £4.52m for 2014/15 the Council has committed to spend 93% of the increased budget.

The Council continues to promote alternatives to payday loans and is actively engaged in a range of Welfare Reform activities including Universal Credit Local Support Services Framework and Direct Payments.

Links

Coalition pledges

Council outcomes

Single Outcome Agreement [SO2](#)

Welfare Reform – Update

Recommendations

- 1.1 It is recommended that the Corporate Policy and Strategy Committee notes:
 - 1.1.1 the Council's ongoing activities relating to Welfare Reform; and
 - 1.1.2 the change to the reporting cycle from bi-monthly to quarterly.

Background

- 2.1 The Corporate Policy and Strategy Committee recommended on 22 January 2013 to continue to monitor the Council's actions relating to Welfare Reform and requested bimonthly update reports. The last report was considered by Committee on 5 August 2014.
- 2.2 Following discussions with relevant Councillors it has now been agreed to report the Welfare Reform update on a quarterly basis, to align with the Working Group meeting cycle.

Main report

Council Housing Services – Under Occupation (UO)

- 3.1 Advice and assistance continues to be provided to households affected by welfare reform. This includes financial advice and assistance to all affected households with regard to consideration of their future housing options. Work is also being undertaken to identify tenants likely to be significantly impacted by future changes arising from Universal Credit and direct payments and to plan for the required changes to services. Updates will be provided to Committee as this work is progressed.
- 3.2 The number of council tenants affected by under-occupation remains fairly static. At the end of July 2014 there were 3,148 tenants affected. Of these tenants, 2,831 (90%) have had a 14% reduction and 317 (10%) have had a 25% reduction in their Housing Benefit entitlement. There are also 20 current tenants affected by the Benefits Cap.
- 3.3 At the end of July 2014 there were 7,264 council tenants with some level of rent arrears (cash value of £4.6m), 1,473 of which were affected by the UO regulations. It should be noted however that there were 969 affected tenants with outstanding rent arrears when the regulations were implemented. The financial advice and assistance has had a positive impact and the number of

affected tenants in arrears has stabilised, reducing from a high of 2,602 in August 2013.

- 3.4 There are currently around 1,293 Registered Social Landlord (RSL) tenants also affected by the UO regulations. The RSLs have provided details of their current rent arrears, and this information and the Council's position is included in Appendix 1.

Temporary and Supported Accommodations

- 3.5 There are currently 71 households in temporary accommodation and 31 in Private Sector Leasing properties where the Benefit Cap applies. Under Occupancy regulations currently affect 254 properties within the temporary accommodation estate and 32 homeless households have had their Housing Benefit reduced as a result.
- 3.6 Families continue, where practicable, to be placed in properties that reduce the likelihood of them being affected by the Under Occupancy regulations. They may on occasion be placed in a larger property to meet their emergency housing need.
- 3.7 Households in temporary accommodation who are affected by the Benefit Cap and/or Under Occupation continue to be provided with advice and assistance to apply for Discretionary Housing Payments.

Scottish Legal Aid Board (SLAB) Funding

- 3.8 The four welfare related partnership projects supported by the SLAB funding continue to work together to assist clients with benefit, welfare and income maximisation related matters. The projects place an emphasis on providing assistance with Discretionary Housing Payment and Personal Independence Payment applications.
- 3.9 The Council's Advice Shop and Citizens Advice Edinburgh partnership continues to provide support and advice in benefit related matters in all 5 Citizens Advice Bureaus to ensure advice is accessible and responds to customers' needs. An additional outreach provision has been established in the Oxfangs Neighbourhood Centre on Friday mornings.

Advice Services

- 3.10 The Debt Advice Forum and Advice Agencies Forum continue to meet regularly to share and discuss related issues.

Council Tax Reduction Scheme (CTRS)

- 3.11 The DWP has confirmed that it will continue with the funding arrangement in place for 2014/15. This reflects the evolving nature of CTRS and that the implementation and migration of Housing Benefit to Universal Credit has been delayed. The related Settlement and Distribution Group are considering the distribution of the funding and will advise Local Authorities accordingly.

3.12 The demand on the 2014/15 budget continues to be monitored from month to month in line with changes to customers' circumstances. At July 2014 the annual projection for the fund was 96% and remains within monitoring tolerances.

Scottish Welfare Fund (SWF) – Crisis Grants and Community Care Grants

3.13 The majority of applications for Crisis Grants are being considered the same day they are received. There has been no 2nd tier review panel meeting during July.

3.14 Approximately 90% of applications for Community Care Grants are being considered within the target of 15 days. Staffing levels within the team continues to be an issue however further recruitment is underway to address this pressure. There have been four 2nd tier review panel meetings during July 2014. Three original decisions were upheld and one was overturned with the customer receiving the relevant household items.

3.15 The SWF budget for 2014/15 is £2,187,628 plus £395,000 carried forward from 2013/14. A total of £455,000 has been allocated to the Crisis Grant fund and £2,127,628 to the Community Care Grant fund.

3.16 The Crisis Grant fund for 2014/15 is:

- £455,000
- £154,128.52 spend to 31 July 2014 (33% of total fund)

3.17 The Community Care Grant fund for 2014/15 is:

- £2,127,628
- £530,366.69 spend to 31 July 2014 (24% of total fund)

3.18 The Scottish Government recently provided details of the Crisis Grant and Community Care Grant awarded for all Scottish Authorities. The Council's combined performance for June 2014 was 21% and July 27%, which is slightly below the Scottish average of 25% and 32% respectively. The 2014/15 spend profile for each fund is included in Appendix 2.

3.19 Crisis Grant applications continue to be considered for high priority cases only and the Community Care Grant for medium and high. The monthly spend levels for both grants continue to be monitored on a daily basis to allow appropriate adjustments to be made to the priority levels.

3.20 The Furnishing Service has delivered 92% of ordered goods within 5 working days. Positive feedback has been received from the SWF team and customers.

3.21 The Furnishing Service's new warehouses in Edinburgh are now fully operational and a further warehouse is being considered in the north of the city. The Furnishing Service has also agreed to set up local community links with schools to start apprenticeship schemes.

Discretionary Housing Payments (DHP)

- 3.22 In May 2014 the Scottish Government announced that an additional £15m would be allocated to Local Authorities to supplement DHP budgets and fully mitigate the effects of Under Occupancy for 2014/15.
- 3.23 The Scottish Government has now confirmed that £12m of the additional £15m will be made available now to 20 Local Authorities who do not have sufficient funds to fully mitigate Under Occupancy. As a result Edinburgh has been allocated an additional £687,102 and this has increased our total DHP fund for 2014/15 to £4.52m.
- 3.24 The remaining £3m of Scottish Government funding will be distributed to councils based on actual DHP expenditure following the publication of the 2014/15 DHP statistics in May 2015.
- 3.25 Edinburgh's projected DHP spend for 2014/15 is estimated at around £4.75m. Therefore a proportion of the remaining £3m will be required to cover all of Edinburgh's DHP expenditure. The Council will continue to monitor DHP spend on a monthly basis and an appropriate claim will be made to the Scottish Government.
- 3.26 Council officers estimated that a further £1.8m would be required to fully mitigate Under Occupancy for 2013/14. There are no additional funds available to address this type of backdating.
- 3.27 There have been 5,813 DHP applications considered up to 31 August 2014. Of these applications 379 related to 2013/14 but were received within the cut off period. As the 2013/14 fund is now closed all successful applications will be awarded from the 2014/15 fund.
- 3.28 During this time there have been 98 refusals for 2013/14 and 328 for 2014/15. The overall refusal rate is currently 6%.
- 3.29 At 31 August 2014 the Council's DHP financial position is:
- £4,519,902 total fund
 - £1,914,451 spend (42% of fund)
 - £2,328,158 committed to 31 March 2015 (a further 51% of the fund)
- 3.30 In overall terms the Council has committed to spend 93% of the allocated budget. Appendix 3 outlines the Council's DHP spend profile at 31 August 2014.
- 3.31 The DHP telephone campaign to contact tenants who are Under Occupying has successfully engaged with and awarded payments for 541 tenants. The next step is to write to the 531 tenants who could not be reached by telephone. At this time 10 tenants refused DHP assistance therefore further contact is being considered.

Payday Loans

- 3.32 The Council continues to be actively involved in the issue of payday loans and the working groups meet regularly to look at ethical alternatives to payday loans and consider longer term, sustainable solutions.

Direct Payment Demonstration Project (DPDP)

- 3.33 The Council continues to learn from this project and will ensure that best practice approaches are adopted when Direct Payments are formally launched.

Universal Credit (UC) and Local Support Services Framework (LSSF)

- 3.34 The first tranche of new Jobcentres to go live in the North West was completed on 28 July 2014. On the same day the roll-out of UC to couples was applied to all live sites. UC is now available to claimants who are newly unemployed but without children. The roll-out to families is still scheduled to commence in the autumn. It remains unlikely that UC will roll-out in Edinburgh before 2016 at the earliest.
- 3.35 Scottish Government and COSLA have written jointly to the UK Government to make representation that the Housing Benefit Administration Grant be protected from further reductions due to the delay in the introduction of UC. The Minister for Welfare Reform, Lord Freud, has confirmed no adjustment will be made to the funding for 2015/16 for UC migration due to the slowdown of implementation.
- 3.36 The Council, DWP and key partners met on 3 September 2014 and agreed a development plan to deliver the LSSF pilot as an informal trial. The trial will commence in October 2014 and end in October 2015 with regular reviews during this period.

The Welfare Reform Working Group

- 3.37 The Welfare Reform Working Group continues to meet quarterly to monitor the impacts of Welfare Reform on the Council and its service user. The group met on the 8 September 2014. Agenda items included:
- delivering Social Security in Edinburgh and the development of a Strategic Response to Welfare Reform in Edinburgh;
 - community planning; and
 - planning for Universal Credit – presentation
- 3.38 Following discussions with relevant Councillors it has now been agreed to report the Welfare Reform update on a quarterly basis, to align with the Working Group meeting cycle. The next Working Group meeting is scheduled for December therefore the next update to Committee will be in January 2015. Officers will provide additional reports if there are any matters of particular urgency.

Strategic Response to Welfare Reform in Edinburgh

- 3.39 The strategic response to welfare reform and related action plan is included in the complimentary report on the Corporate Policy and Strategy Committee agenda for 30 September 2014.

3.40 The Welfare Reform Core Group has agreed that the action plan will be addressed quarterly with updates to the Welfare Reform Working Group.

Single Fraud Investigation Service (SFIS)

3.41 The implementation date for the Council remains as 1 November 2014. Meetings between the DWP's and the Council's HR teams have taken place and we will continue to work together to ensure staff are properly supported during any transfer and transition to the new service. A separate update will be provided to Finance and Resources Committee in October 2014.

Measures of success

4.1 The success of the programme will continue to be measured through:

- reductions in forecast loss of income; and
- customer satisfaction with advice and advocacy services relating to benefit changes, including increased benefit take up and minimises losses by ensuring people get their full entitlement under the new arrangements

Financial impact

5.1 The increase in numbers of people experiencing hardship has led to increased demand for services across the Council and also partner advice agencies. There is a risk to Council income, particularly in relation to rent arrears, changes to subsidy levels for temporary accommodation and service charges. Known risks include:

- loss of rental income to the Housing Revenue Account (HRA) arising from Housing Benefit under Occupation reforms and Direct Payment under Universal Credit;
- Scottish Welfare Fund and Discretionary Housing Payment budget will be insufficient to meet demand longer term;
- the spend on Council Tax Reduction Scheme exceeds the available funding;
- reduced DWP Administration Subsidy due to the abolition of Council Tax Benefit, the phasing out of Housing Benefit and Central Government budget savings; and
- increased demand on advice and advocacy both for the Council and Third Sector advice agencies.

Risk, policy, compliance and governance impact

6.1 The financial risk to the Council as well as the risk to the Council's reputation is being monitored regularly. Actions taken to assess and mitigate these risks and ensure effective governance include:

- bimonthly updates were provided to Corporate Policy and Strategy and Finance and Resources Committees, however, these will now be reported on a quarterly basis, to align with the Working Group meeting cycle;
- annual update to Risk, Governance and Best Value Committee;

- dedicated teams introduced to provide support and assistance;
- quarterly meetings with Elected Members, Council Officers and External Partners; and
- a strategic approach and action plan for delivering Social Security in Edinburgh (A strategic response to Welfare Reform in Edinburgh)

Equalities impact

- 7.1 The UK Government has prepared Equalities and Human Rights assessments for the welfare reform proposals. The Council will undertake an EHRIA when necessary for any of its proposals.

Sustainability impact

- 8.1 Welfare Reform is expected to have general implications for environmental and sustainability outcomes, for example in relation to fuel poverty and financial exclusion.

Consultation and engagement

- 9.1 Council officials continue to engage with the UK and Scottish Governments, directly and through COSLA, with the DWP, the Third Sector, the NHS and other partners. The Council is also engaging with citizens, both in and out of work, who rely on benefit income and tax credits.
- 9.2 The Council continues to participate in a number of groups with the DWP looking at the impacts of Welfare Reform, namely Local Authority Transition Working Group (LATWG), Practitioners Operational Group (POG), as well as COSLA's Welfare Reform Local Authority Representative Group.

Background reading / external references

Recent reports to committee:

[Welfare Reform – update](#) – Finance and Resources Committee, 28 August 2014

[Discretionary Housing Payment Policy](#) – Corporate Policy and Strategy Committee, 5 August 2014

[Welfare Reform – update](#) – Corporate Policy and Strategy Committee, 5 August 2014

[Welfare Reform – update](#) – Finance and Resources Committee, 5 June 2014

[Welfare Reform – update](#) – Corporate Policy and Strategy Committee, 13 May 2014

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Links

Coalition pledges

Council outcomes

Single Outcome Agreement

SO2 – Edinburgh’s citizens experience improved health and wellbeing, with reduced inequalities in health

Appendices

Appendix 1 – Council and Registered Social Landlord rent arrears profile

Appendix 2 – The Scottish Welfare Fund spend

Appendix 3 – Discretionary Housing Payment Spend

Council and Registered Social Landlords Rent Arrears Profile

Name	Total Housing Stock Properties	Total Rent Arrears (£) 2014/15	Current Number of Tenants Impacted by UO	Number of Tenants UO who have Rent Arrears	% of Tenants UO who have Rent Arrears	Total Current Rent Arrears Relating to UO (£) 2014/15
CEC	19,915	4,618,809	3,148	1,473	47%	*563,835
**RSL 1	482	108,659	47	32	68.1%	Not Known
RSL 2	5,451	717,605.23	361	208	57.62%	98,585.99

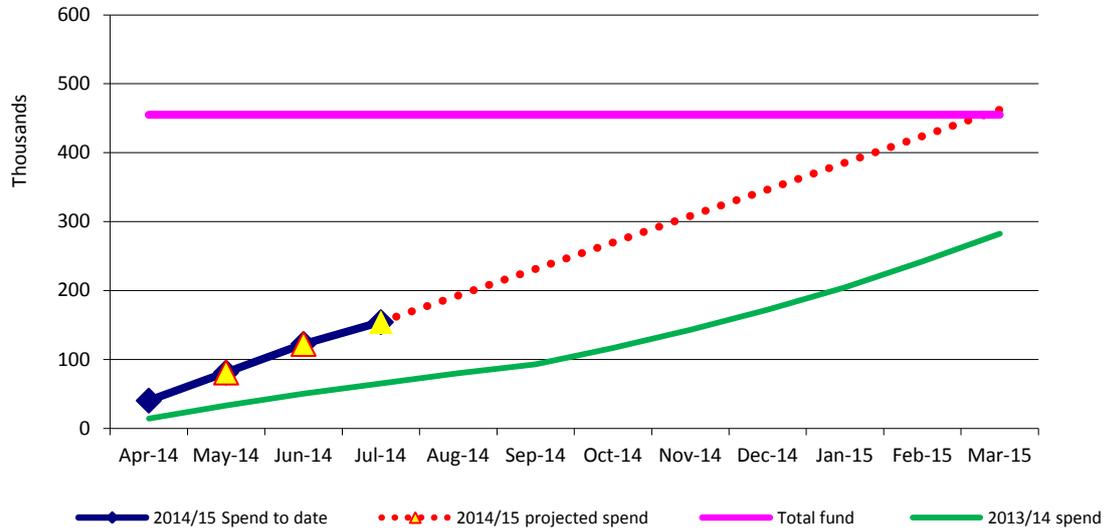
* Please note that this figure is the arrears accrued by tenants affected by Housing Benefit Under Occupancy since April 2013. It does not include any pre-existing arrears.

** Arrears figures are based on the rent fortnight ending 17th August 2014.

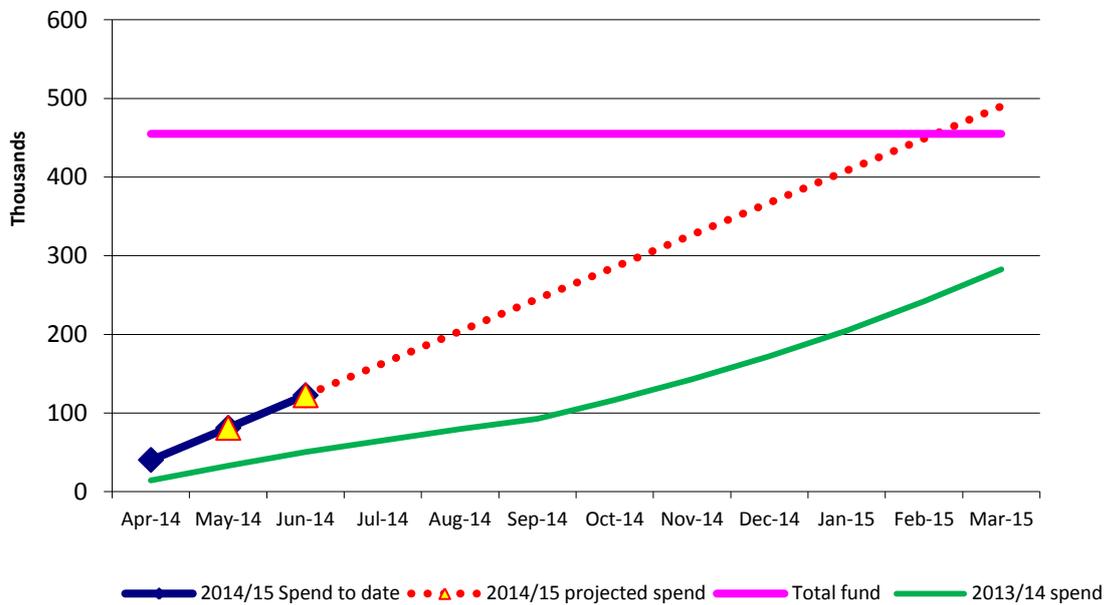
** The total rent arrears of those Under Occupying was £8,874 however as the majority are in receipt of DHP the arrears are not directly attributable to Under Occupancy.

Scottish Welfare Fund (July 2014)

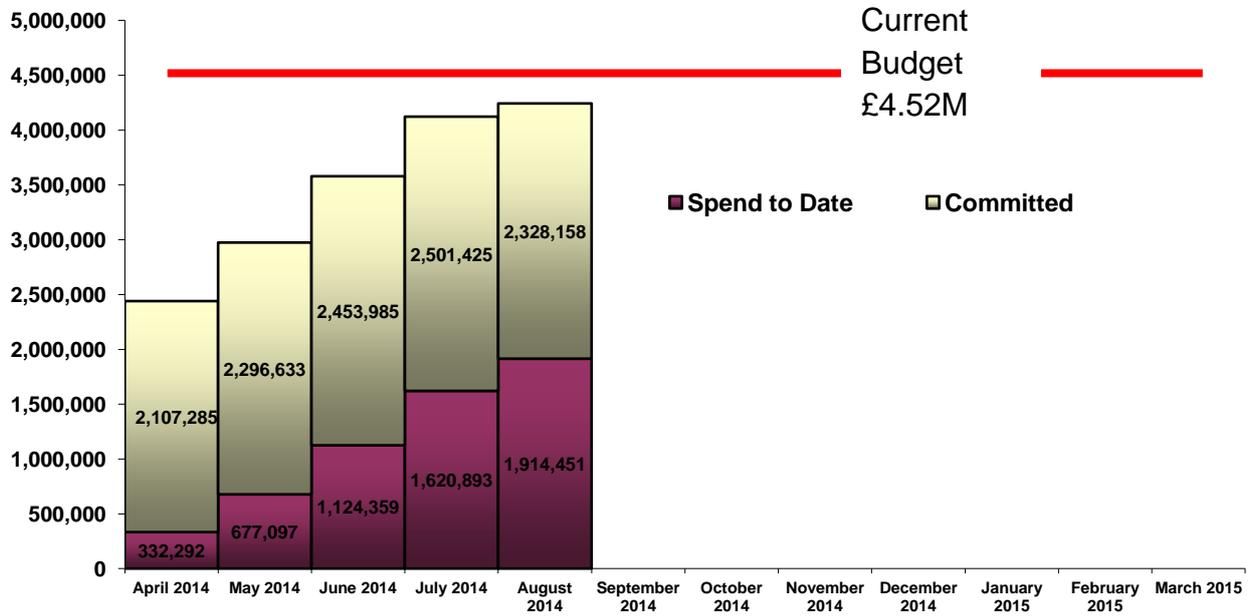
Crisis Grant Allocation 2014/15



Crisis Grant Allocation 2014/15



Discretionary Housing payment 2014/15



Corporate Policy and Strategy Committee

10.00am, Tuesday 30 September 2014

Strategic Response to Welfare Reform in Edinburgh

Item number	7.2
Report number	
Executive/routine	
Wards	All

Executive summary

The Welfare Reform Act 2012 was enacted by the Parliament of the United Kingdom on 8 March 2012 and was introduced as part of the programme of austerity with the aim of reducing the amount of welfare spending in the UK.

The impact of the Act has potential implications for the Council and the citizens of Edinburgh in terms of poverty and inequality. The strategic objectives to mitigate these risks are:

- Prevention of hardship and worsening inequality;
- Effective response to crisis needs for housing, heat and food;
- Effective support for vulnerable individuals and families; and
- Partnership action to sustain Edinburgh's social security.

Links

Coalition pledges	P1, P6, P7, P8, P9, P10, P11, P12, P25, P29, P36 and P38
Council outcomes	CO6, CO8, CO9, CO10, CO14, CO15, CO16 and CO23
Single Outcome Agreement	SO2

Strategic Response to Welfare Reform in Edinburgh

Recommendations

1.1 It is recommended that the Corporate Policy and Strategy Committee:

- 1.1.1 approve the Council's Strategic Response to Welfare Reform in Edinburgh and related action plan.

Background

2.1 The Council and its community planning partners have recognised that the substantial changes in welfare benefits controlled by UK Government have potential implications for the city in terms of increased poverty and inequality. The document attached at Appendix 1 outlines Edinburgh's response to this important area.

Main report

Strategic Response to Welfare Reform in Edinburgh

- 3.1 The Council's Welfare Reform Core Group has developed a strategic response to welfare reform in Edinburgh, and this is attached at Appendix 1.
- 3.2 The document outlines that any reductions in the levels of welfare benefits has serious implications for the Council and the citizens of Edinburgh through increased poverty and inequality.
- 3.3 In practical terms these changes are likely to lead to increased need for benefits advice and advocacy services, money management/debt advice and access to food banks and furniture initiatives. There is also the risk of increased and shifting demands for health, social work, housing, employability and homeless services which may challenge existing provision.
- 3.4 In response to these changes an action plan has been developed which details the Council's strategic approach to mitigate any negative impacts. The strategic objectives are:
- prevention of hardship and worsening inequality;
 - effective response to crisis needs for housing, heat and food;
 - effective support for vulnerable individuals and families; and
 - partnership action to sustain Edinburgh's social security.

- 3.5 The action plan will be reviewed and monitored quarterly. Outcomes will be presented to the Welfare Reform Working Group and reported as part of the Welfare Reform updates to the Corporate Policy and Strategy Committee.

Measures of success

- 4.1 Outcomes will be evaluated through both quantitative and qualitative measures that indicate the impact of actions, strategies and services.

Financial impact

- 5.1 The increase in numbers of people experiencing hardship has led to increased demand for services across the Council and also partner advice agencies. There is a risk to Council income, particularly in relation to rent arrears, changes to subsidy levels for temporary accommodation and service charges. Known risks include:
- Loss of rental income to the Housing Revenue Account (HRA) arising from Housing Benefit Under Occupation reforms and Direct Payment under Universal Credit.
 - Scottish Welfare Fund and Discretionary Housing Payment budget will be insufficient to meet demand longer term.
 - The spend on Council Tax Reduction Scheme exceeds the available funding.
 - Reduced DWP Administration Subsidy due to the abolition of Council Tax Benefit, the phasing out of Housing Benefit and Central Government budget savings.
 - Increased demand on advice and advocacy both for the Council and Third Sector advice agencies.

Risk, policy, compliance and governance impact

- 6.1 The financial risk to the Council as well as the risk to the Council's reputation is being monitored regularly. Actions taken to assess and mitigate these risks and ensure effective governance include:
- bimonthly update to Corporate Policy and Strategy and Finance and Resources Committees;
 - annual update to Risk, Governance and Best Value Committee;
 - dedicated teams introduced to provide support and assistance;
 - quarterly meetings with Elected Members, Council Officers and External Partners; and
 - a strategic approach and action plan for delivering Social Security in Edinburgh (A strategic response to Welfare Reform in Edinburgh)

Equalities impact

- 7.1 The UK Government has prepared Equalities and Human Rights assessments for the welfare reform proposals. The Council will undertake an EHRIA when necessary for any of its proposals. Initial research has evidenced that those most likely to have their standards of living reduced by welfare reform are;
- women;
 - single parents; and
 - people with disabilities and other complex health issues.

Sustainability impact

- 8.1 Welfare Reform is expected to have general implications for environmental and sustainability outcomes, for example in relation to fuel poverty and financial exclusion.

Consultation and engagement

- 9.1 Council officials continue to engage with the UK and Scottish Governments, directly and through COSLA, with the DWP, the Third Sector, the NHS and other partners. The Council is also engaging with citizens, both in and out of work, who rely on benefit income and tax credits.

The Council continues to participate in a number of groups with the DWP looking at the impacts of Welfare Reform, namely Local Authority Transition Working Group (LATWG), Practitioners Operational Group (POG), as well as COSLA's Welfare Reform Local Authority Representative Group.

Background reading / external references

Recent reports to committee:

[Welfare Reform – update](#) – Corporate Policy and Strategy Committee, 30 September 2014

[Welfare Reform – update](#) – Corporate Policy and Strategy Committee, 5 August 2014

[Welfare Reform – update](#) – Corporate Policy and Strategy Committee, 13 May 2014

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Links

Coalition pledges

Council outcomes

Single Outcome Agreement

SO2 – Edinburgh’s citizens experience improved health and wellbeing, with reduced inequalities in health

Appendices

Appendix 1 – Delivering Social Security in Edinburgh, a strategic response to Welfare Reform

Delivering Social Security in Edinburgh

A strategic response to Welfare Reform

Contents

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Introduction to Welfare Reform.	1-2
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Vision for Edinburgh	14
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Introduction to Welfare Reform

The Welfare Reform Act 2012 is an Act of Parliament in the UK which makes changes to the rules concerning a number of benefits offered within the British social security system. It was enacted by the Parliament of the United Kingdom on 8 March 2012. The Act was introduced as part of the programme of austerity with the aim of reducing the amount of welfare spending in the UK.

The five main changes to the Act include the introduction of:

- Housing Benefit Under Occupancy in the social rented sector;
- Council Tax Support Scheme;
- Benefit Cap;
- Personal Independence Payments; and
- Universal Credit.

Under Occupancy in the social rented sector – was introduced on 1 April 2013. This affects around 5,000 working aged social tenants in Edinburgh, whose Housing Benefit is reduced by 14% if they are considered to have one bedroom surplus to their requirements and 25% if they have two or more bedrooms.

Council Tax Reduction Scheme – was introduced on 1 April 2013 and replaced Council Tax Benefit. In Scotland the administration of the new scheme mirrors that of the previous Council Tax Benefit however funding has been reduced by 10%. In addition the DWP administration for the scheme has been reduced to reflect this is no longer part of Social Security Regulations.

Benefit Cap – places a maximum amount that a claimant can receive in total from State Benefits, Tax Credits and Housing Benefit. The limit is £350 per week for a single person and £500 a week for a couple with children or a single parent. The pilot commenced in London on 15 April 2013 and was introduced in Edinburgh on 12 August 2013.

The introduction of the Benefit Cap has not had the expected impact that was originally anticipated. However the Council continues to support all affected households.

Personal Independence Payments (PIP) – replaces Disability Living Allowance (DLA). Application for new claims began as a pilot in areas of England in April 2013 this was rolled out nationally in June 2013.

In October 2013 the DWP invited existing DLA claimants in Wales and parts of England to claim PIP and this was extended to Edinburgh on 13 January 2014. The extent of any increased demand is unknown as the DWP decision making process is taking around 6 months and there are currently few outcomes to report. In May 2013 there were 22,990 people with a disability claiming Housing Benefit in Edinburgh.

Universal Credit (UC) – replaces the main out of work benefits. The pilot commenced in the North West of England in April 2013 and a limited national roll-out commenced in October 2013.

The number of claimants being processed through UC is significantly lower than anticipated. It is unlikely that UC will roll-out in Edinburgh before 2016 however the Council and its key partners are developing an action plan to support claimants prepare for UC.

The impact of these reforms has potentially serious implications for poverty and inequality for the citizens of Edinburgh. The strategic objectives to mitigate these risks are:

- Prevention of hardship and worsening inequality;
- Effective response to crisis needs for housing, heat and food;
- Effective support for vulnerable individuals and families; and
- Partnership action to sustain Edinburgh's social security.

Practical Actions

The main areas for action are summarised below and are set out in a detailed action plan for each theme.

Prevention of hardship and worsening inequality

- Welfare rights and benefits advice
- Employability options
- Financial education
- Money Advice, including budgeting skills
- Housing Options Advice
- Mitigation of financial hardship
- Core skills of literacy and numeracy
- Online access and skills
- Affordable Childcare

Effective response to crisis needs for housing, heat and food

- Emergency action for households with no income or inadequate income for basic needs – e.g. Scottish Welfare Fund (SWF) and Discretionary Housing payments (DHP)
- Community responses e.g. foodbanks
- Inter-service referrals e.g. homelessness and health / social care
- Delivery of the City Housing Strategy
- Housing advice and homelessness prevention

Effective support for vulnerable individuals and families

- Improved awareness and uptake of advice and support services
- Employment advice and DWP services
- Reducing debt and arrears
- Family and household support – income maximisation / budgeting skills / fuel poverty
- Housing options
- Support for critical needs such as mental ill health
- Health and social care and child care support for vulnerable people or households

Partnership action to sustain Edinburgh's social security

- Strategic action plans with RSLs
- Additional partner resources to match needs
- Develop a shared information framework to capture and disseminate customer and service focused knowledge.
- Identify training needs and meet them through a joint training programme

Taking into account the benefit and tax credit changes that have been introduced since April 2013, and the different types of advice work required, additional advice posts have been funded across Third Sector agencies and the

Council's own advice services. Additional resources of £0.35million have been secured for 2013-14 and beyond. These resources were focused on preventing the loss of income and homelessness and helping people to develop greater financial awareness.

The current infrastructure with regard to key service areas and other provision directly related to mitigating the negative impacts of Welfare Reform or delivering actions that contribute to implementing change or supporting those affected by change, is detailed in Appendix 3.

City of Edinburgh Council

Welfare Reform Action Plan outline

NOTE

Some of the actions noted in this plan are already underway or are planned through other strategic developments. Their inclusion here is intended to demonstrate the inter-dependencies that exist and will need to develop between existing activities and specific Welfare Reform activities.

Objective	Key actions	Outcome(s)	Timescale	Lead Responsibility	Key Stakeholders
1. Prevention of hardship and worsening inequality					
1.1 Improved employability options	<ul style="list-style-type: none"> • Ensure an integrated approach to employability support • Deliver and support routes into employment through the management of direct and commissioned services • Offer living wage in all public sector and Edinburgh Partner employment via Joined up for Jobs Partnership and potentially being adopted by the EP, Economic Development Strategy Partnership • Implement Affordable Childcare 	<ul style="list-style-type: none"> • More citizens in paid employment • Employee skills developed to support progression in employment • Reduced financial hardship • Improved access to employment options • Improved DWP 	Review Position Quarterly	CEC Economic Development	Joined up for Jobs Partnership Voluntary sector advice providers

Objective	Key actions	Outcome(s)	Timescale	Lead Responsibility	Key Stakeholders
	Strategy <ul style="list-style-type: none"> Provision of employment rights advice 	partnership working			
1.2 Ensure Edinburgh citizens are aware of Welfare Reform impacts and are able to access support and assistance	<ul style="list-style-type: none"> Develop Communications Plan for all aspects of Welfare Reform Deliver public awareness-raising campaigns Maximise the use of website and social media to raise public awareness and engagement with services Provide councillors and decision-makers with key data to inform processes 	<ul style="list-style-type: none"> Citizens are aware of Welfare Reform changes and understand how to access support and assistance 	Review 6 monthly Annually Review 6 monthly Quarterly update reports	Corporate Governance with support from Comms Corporate Governance with support from Comms Corporate Governance	CEC – Core Group DWP NHS Voluntary Sector
1.3 Prepare for Implementation of Universal Credit	<ul style="list-style-type: none"> Redesign CEC Rent Service and Temporary Accommodation Review Engage with DWP and key stakeholders to plan for implementation Create Action Plan for Preparation of Local Support Services 	<ul style="list-style-type: none"> Rental income is secured Coordinated provision of services 	Apr 2015 July 2014 Quarterly	Housing and Temporary Accommodation Corporate Governance &	CEC – HSC, SfC, CG DWP Voluntary

Objective	Key actions	Outcome(s)	Timescale	Lead Responsibility	Key Stakeholders
	<ul style="list-style-type: none"> • Deliver public awareness-raising campaigns • Develop an integrated approach to identify and engage with those needing support, particularly vulnerable groups and agencies working with them 	<ul style="list-style-type: none"> • Citizens are aware of welfare Reform changes 	Reviews Sept 2014 April 2015 Oct 2014 Quarterly Reviews	Housing Corporate Governance Comms team Core Group	Sector

2. Effective response to crisis needs for housing, heat and food

2.1 Improve and expand accessibility of local services and digital resources	<ul style="list-style-type: none"> • Scope existing provision with view to 're-aligning' services to best meet identified needs • Develop and implement digital and online resources • Support citizens to access and use available resources • Develop Local Support Services Framework (LSSF) for Universal Credit and Direct Payments • All services to consider whether digital access is available 	Citizens can access appropriate resources to obtain assistance	Nov 2014 Aug 2014 Aug 2014 Oct 2014 Review 6 Monthly	CLD, Corporate Governance & SfC	CEC – HSC, C&F, ED NHS Voluntary Sector
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Objective	Key actions	Outcome(s)	Timescale	Lead Responsibility	Key Stakeholders
2.2 Increase awareness and capacity of partners to support people in hardship	<ul style="list-style-type: none"> Develop and implement training and awareness-raising resources 	Citizens receive effective information, advice & support	Jul 2014 Review Quarterly	Core Group	CEC – SfC, HSC, C&F, ED, Comms
2.3 Deliver effective financial support to prevent and assist households with crises	<ul style="list-style-type: none"> Develop Scottish Welfare Fund service Develop options to assist households in crisis 	Household crises prevented and mitigated	Review 6 monthly	Corporate Governance Core Group	CEC – ED NHS Voluntary Sector
2.4 Deliver effective financial support for housing-related costs	<ul style="list-style-type: none"> Develop Discretionary Housing Payment service 	Reduced rent arrears Improved levels of Homelessness prevention	Review 6 monthly	Corporate Governance	CEC – SfC, HSC, C&F, ED NHS Voluntary Sector

Objective	Key actions	Outcome(s)	Timescale	Lead Responsibility	Key Stakeholders
2.5 Sustainable Temporary Accommodation provision	<ul style="list-style-type: none"> Review Temporary Accommodation to ensure provision meets customer needs 	Improved and sustainable options for homeless people	Sep 2014 Review Position Quarterly	Housing	CEC – SfC, CG, HSC
2.6 Landlords to be prepared for impact of Universal Credit / Direct Payments	<ul style="list-style-type: none"> Landlords to plan for changes due to benefit cap and Universal Credit Manage the transition period of existing claimants moving to UC 	Housing needs met through sustainable solutions	Review Apr 2015	Core Group, RSLs, PRS landlords	CEC – SfC, CG, DWP
2.7 Access to free food and food co-operatives is available to households in poverty	<ul style="list-style-type: none"> Support the capacity development and operation of food banks and other community action such as food co-operatives Consider delivery of food to people in need of food 	Households in poverty have access to basic necessities	Review 6 monthly Review 6 Monthly	Core Group	Voluntary Sector NHS Working Group
2.8 Reduce fuel poverty	<ul style="list-style-type: none"> Promote energy saving and raise awareness about how to reduce energy costs 	Reduced financial hardship*	Review 6 monthly	SFC, Housing	CEC – SfC, RSLs, PRS landlords, Voluntary

Objective	Key actions	Outcome(s)	Timescale	Lead Responsibility	Key Stakeholders
					Sector

3. Effective support for vulnerable individuals and families

3.1 Prevent homelessness due to the impact of Welfare Reform	<ul style="list-style-type: none"> Promote DHP for tenants affected by Under Occupancy Charge, Benefits Cap and other financial pressures Provide support and advice to tenants Provide proactive housing advice and housing options assessments Provide effective support and advice services Engage with social and private rented sector landlords to promote mitigating activities 	<p>Reduced homelessness as a result of financial hardship</p> <p>Coordinated and effective services to prevent homelessness</p> <p>Housing needs met through sustainable solutions</p>	<p>Aug 2014 Review Quarterly</p> <p>Review 6 monthly</p> <p>Review 6 monthly</p>	Housing & Homelessness Prevention Services	<p>CEC – CG, HSC, C&F</p> <p>Voluntary Sector</p> <p>NHS</p>
3.2 Maximise the income of people dependent on benefits	<ul style="list-style-type: none"> Deliver and support effective advice provision to assist claimants Maximise gains produced through advice provision Ensure sufficient capacity in advice sector 	Reduced financial hardship for those in poverty and on low incomes*	<p>Review 6 monthly</p> <p>Quarterly reports</p> <p>Review 6</p>	Advice Shop Income Max Team	<p>CEC – CG, HSC, C&F</p> <p>Voluntary Sector</p>

Objective	Key actions	Outcome(s)	Timescale	Lead Responsibility	Key Stakeholders
	<ul style="list-style-type: none"> Measure customer satisfaction with advice services 		monthly Annual reports		NHS CAB
3.3 City of Edinburgh Council and partner agency staff to be skilled to support customers affected by Welfare Reform	<ul style="list-style-type: none"> Identify staff delivering key services and train them to deliver effective, high quality provision Train all staff to maintain an appropriate level of knowledge to assist customers Develop Welfare Reform e-learning modules and web / intranet-based information 	Citizens empowered and supported to resolve financial problems	Jul 2014 Oct 2014 Oct 2014	Core Group Housing & Corporate Governance Core Group	CEC – HSC, C&F Voluntary Sector NHS
3.4 Report and share welfare reform related information across CEC departments to support effectiveness and efficiency	<ul style="list-style-type: none"> Develop common definitions of needs and interventions to allow shared reporting Provide regular updates to Committees Produce regular performance data reports 	Better coordinated service provision and strategic planning	Quarterly reports Bi-monthly	Core Group	Voluntary Sector NHS

Objective	Key actions	Outcome(s)	Timescale	Lead Responsibility	Key Stakeholders
3.5 Develop Community Financial capacity	<ul style="list-style-type: none"> • Deliver and support effective advice services • Minimise rent arrears • Improve access to basic bank accounts and to nil or low cost credit • Divert low income households away from payday loans • develop Credit Union functions such as current accounts • create training and incentives for savings and budget planning • Develop capacity of individuals and communities to make sustainable financial decisions 	<ul style="list-style-type: none"> • Reduced financial hardship for those in poverty and on low incomes* • Reduced levels of personal debt across Edinburgh • More citizens have access to sustainable credit and bank account • Local access to financial literacy courses 	<p>Review 6 monthly</p> <p>Mar 2015</p> <p>Mar 2015</p> <p>Apr 2015</p>	Core Group	<p>CEC – SfC, HSC, C&F</p> <p>CLD, Comms</p> <p>Voluntary Sector</p>

4. Partnership action to sustain Edinburgh's social security

4.1 Seek to develop and secure resources to mitigate impact of Welfare Reform	<ul style="list-style-type: none"> • Annually review the need and effectiveness of dedicated resources 	<ul style="list-style-type: none"> • Reduced hardship amongst the population* • More effective service provision** 	<p>Feb 2015</p> <p>Jan 2015</p> <p>Aug 2014</p>	<p>Core Group</p> <p>Core Group</p>	<p>CEC – SfC, CG, C&F</p> <p>HSC, C&F</p> <p>Voluntary Sector, NHS</p>
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Objective	Key actions	Outcome(s)	Timescale	Lead Responsibility	Key Stakeholders
4.2 Fully understand the impact of Welfare Reform on Edinburgh's people and economy	<ul style="list-style-type: none"> Develop and maintain robust intelligence on Welfare Reform e.g. assess predicted impact; report on actual annual impacts Involve people affected by Welfare Reform in locally based research and support groups 	<ul style="list-style-type: none"> Evidence-based developments that meet needs of citizens Citizens are able to engage with and influence development of services 	<p>Aug 2014</p> <p>Oct 2014</p>	Core Group with support from Business Intelligence Team	<p>CEC – SfC, CG, HSC, CLD ED</p> <p>Voluntary Sector</p> <p>DWP</p> <p>NHS</p>
4.3 Secure and align resources to help mitigate impact of Welfare Reform	<ul style="list-style-type: none"> Develop resources to mitigate impact of Welfare Reform Business Intelligence Team to provide resources to support strategic planning Annually review the need and effectiveness of dedicated resources Seek external funding and maximize partnership opportunities to support CEC to develop Welfare Reform provision Work in partnership with voluntary sector, NHS and other partners to deliver mitigating activities 	<ul style="list-style-type: none"> Reduced hardship amongst the population* More effective service provision** 	<p>Review Dec 2014</p> <p>Dec 2014</p> <p>Oct 2014</p> <p>Review Quarterly</p>	<p>Core Group</p> <p>Core Group</p> <p>Core Group/SMT's</p> <p>Core Group, SMT, CMT</p>	<p>CEC – SfC, HSC, ED, C&F</p> <p>Voluntary Sector</p> <p>NHS</p>

Objective	Key actions	Outcome(s)	Timescale	Lead Responsibility	Key Stakeholders
			Review Quarterly		
4.4 Report and share information about Welfare Reform across CEC departments to support effectiveness and efficiency	<ul style="list-style-type: none"> • Provide regular updates to Committees • Produce regular performance data reports to quantify impact of Welfare Reform by area and sector • Monitor and evaluate actions • Report and share information across services and partners 	Greater coordination between departments and teams to deliver effective services	Bi-monthly Bi-monthly	Core Group	CEC – SfC, HSC, ED, C&F
4.5 Ensure that citizens have access to appropriate information and advice on welfare benefits and debt matters	<ul style="list-style-type: none"> • Develop and implement an Advice Strategy • Promote advice services to maximise accessibility • Develop advice services to ensure effective outcomes are delivered 	Citizens income is maximised and financial problems resolved	Mar 2015 Jul 2014 Review Oct 2014	Advice Shop	CEC – CG, HSC, C&F, ED Voluntary Sector NHS

*Reduced hardship amongst the population means fewer people experience:

- being in rent arrears
- problem debts
- homelessness as a result of financial problems

**More Effective Service provision means services:

- Are accessed by more people
- Produce better outcomes for service users than at present
- Can evidence greater co-ordination with other relevant services

Implications for Edinburgh

The City of Edinburgh Council (CEC) and its community planning partners have recognised that the substantial changes in eligibility for - and levels of - welfare benefits controlled by the UK Government have substantial and serious implications for the city of Edinburgh. Simpler benefit systems that support people into work are generally welcomed as positive aspects of Welfare Reform within standards of fairness and the ability to meet real need in our communities.

The scale of hardship from the reduction in access to benefits and in the level of financial support available for individuals and families has obvious negative implications through increased poverty and inequality. This contradicts and works against the CEC and Partnership vision for the city and creates tangible risks for the quality of life on which the city's prosperity and social security depend.

Inequality and hardship are tangibly increased when individuals and households do not have social security in the sense of resources to meet their basic needs for shelter, warmth, food and social contact. This strategy is aimed to ensure that people in Edinburgh are not denied this level of social security.

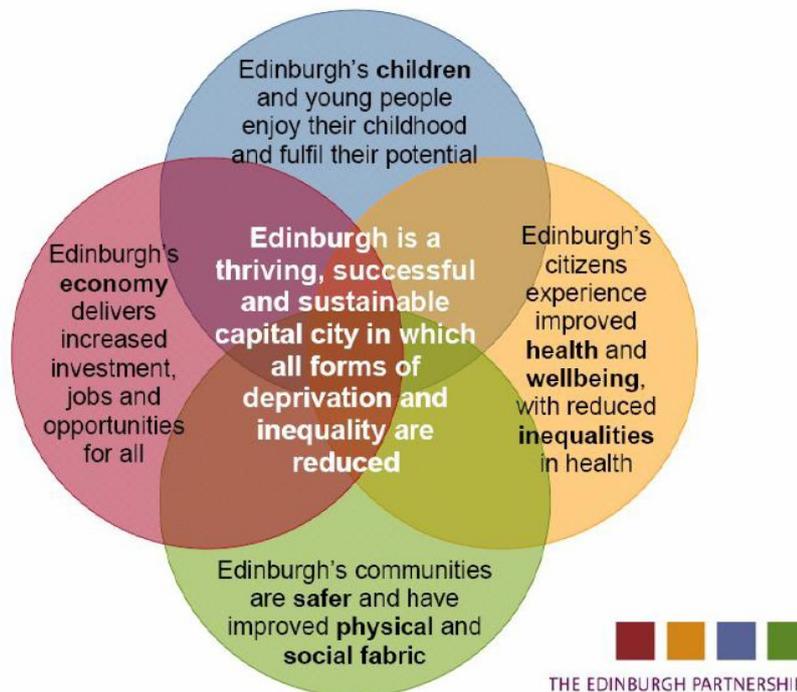
In immediate, practical terms the Welfare Reform changes, as well as supporting some people into employment, are leading to increased need for benefits advice and advocacy services, money management and debt advice, access to credit, food banks, furniture initiatives, and increased demand on health, social work, housing, employability and homelessness services, as well as reductions in council income. Arrangements are being made to provide effective responses to these immediate needs and to take strategic action which can prevent long term damage for individuals, communities and for the city.

The growing numbers of people experiencing hardship is increasing demand for services in many areas of the Council and partner agencies¹. There is also a risk to Council income, particularly through loss of direct payments of housing benefit, changes to subsidy levels for temporary accommodation and service charges. An indicator of the needs in this area is the over 700% increase in Discretionary Housing Payments made in 2013-14 compared with 2012-13. There is a further risk to Council income with the reduction in DWP administration subsidy levels as Housing Benefit is replaced by direct payment of housing costs through Universal Credit.

Work has been undertaken by the Business Intelligence Team to quantify likely financial impacts and to identify funding sources or budgetary options for the investment required in prevention and mitigation measure, including a Business Continuity Impact Assessment using a model agreed with the Convention of Scottish Local Authorities (COSLA).

¹ See Appendix 1 for data on advice provision

Vision for Edinburgh



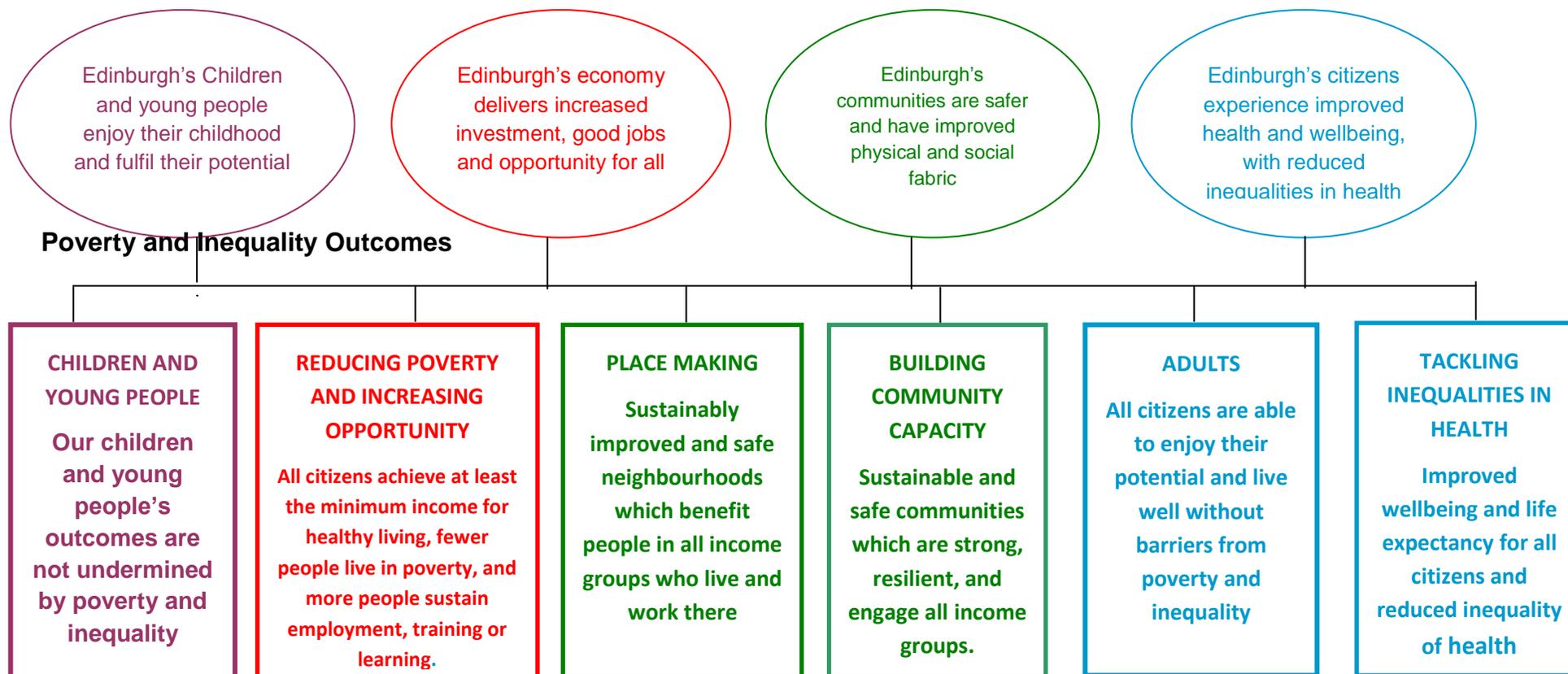
Strategic Outcomes and Objectives

The Single Outcome Agreement shows that the Partnership wants to see a thriving, successful and sustainable capital city. It is central to this vision that all forms of deprivation and poverty are reduced. Edinburgh cannot be that kind of city if it is effectively two cities because of inequality and poverty.

Many things which influence poverty and inequality are decided outside the city, and effective social security is a huge factor in this. The Partnership has commissioned detailed work to make it clear what can be done in the city to tackle poverty and inequality by working together across all partners and sectors, and it will be vital to have a response to reductions in social security. An Edinburgh Partnership working group set out a framework as a practical tool for City partnerships and partners to apply through engagement with people and communities who experience inequality. The outcomes for reducing poverty and inequality and the principles to be applied are set out in the diagram below, and work is continuing to develop practical actions in each priority area which can work towards these outcomes using these principles.

It is crucial that practical actions to counter those elements of Welfare Reform which are creating a reduction in social security for the poorest citizens are part of this framework. This strategy is intended to help develop appropriate responses.

SOA Priorities



Six Principles for all outcomes:

- i) Building trust share power with people in poverty; ii) Reduce the stigma surrounding poverty and tackle discrimination; iii) Better joined up services from all sectors; iv) Greater community and service user participation in planning, delivering and evaluating service; v) Making sure something happens, resourced actions; vi) Increase universal services not charged at point of delivery

Capital Coalition Pledges

The Council agreed 53 Pledges from the Capital Coalition in August 2012. These set out the commitment to build a cooperative, more prosperous Edinburgh in which every resident and community benefits in a “contract with the capital” based on the six key priorities below:

- Ensuring every child has the best start in life
- Reducing poverty, inequality and deprivation
- Providing for Edinburgh’s economic growth and prosperity
- Strengthening and supporting our communities and keeping them safe
- Ensuring Edinburgh, and its residents, are well cared for
- Maintaining and enhancing the quality of life in Edinburgh

The reductions and changes in social security are seen as a significant risk in relation to each of these priorities and a number of the specific pledges. For example, a number of pledges in relation to *Reducing poverty, inequality and deprivation* are in relation to housing stability and quality, which are undermined by the reduction in housing benefit entitlement and restrictions on total benefit and number of bedrooms allowed. These provisions have already led to increasing arrears which cause financial difficulty for housing providers including the Council and endanger the housing of many vulnerable tenants.

Coalition Pledges that are directly linked to impact of Welfare Reform

- | | |
|------------|--|
| P1 | Increase support for vulnerable children, including help for families so that fewer go into care |
| P6 | Establish city-wide childcare co-operatives for affordable childcare for working parents |
| P7 | Further develop the Edinburgh Guarantee to improve work prospects for school leavers |
| P8 | Make sure the city’s people are well-housed, including encouraging developers to build residential communities, starting with brownfield sites |
| P9 | Work in partnership with Scottish Government to release more funds for Council homes for rent |
| P10 | Set up a task force to investigate ways to bring empty homes into use |
| P11 | Encourage the development of co-operative housing arrangements |

- P12** Work with health, police and third sector agencies to expand existing and effective drug and alcohol treatment programmes
- P25** Introduce a “living wage” (currently set at £7.20) for Council employees, encourage its adoption by Council subsidiaries and contractors and its wider development
- P29** Ensure the Council continues to take on apprentices and steps up efforts to prepare young people for work
- P36** Develop improved partnership working across the Capital and with the voluntary sector to build on the “Total Craigroyston” model
- P38** Promote direct payments in health and social care.

Strategic Outcomes

The risks from reduced social security are likely to restrict or reverse progress in a number of key Council Strategic Outcomes:

No	Strategic Outcomes
CO6	Our children’s and young people’s outcomes are not undermined by poverty and inequality
CO8	Edinburgh’s economy creates and sustains job opportunities
CO9	Edinburgh residents are able to access job opportunities
CO10	Improved health and reduced inequalities
CO14	Communities have the capacity to help support people
CO15	The public is protected
CO16	Well-housed – People live in a good quality home that is affordable and meets their needs in a well managed Neighbourhood
CO23	Well engaged and well informed – Communities and individuals are empowered and supported to improve local outcomes and foster a sense of community

Strategic Objectives

The Council and Edinburgh Partnership regard social security as an essential element of their vision of a thriving, successful, sustainable capital city. The substantial changes and reduction in income to the most vulnerable citizens is identified as a significant risk which can potentially increase all forms of deprivation and inequality.

The main risks identified include:

Corporate

- Reductions in housing benefit due to under occupancy and loss of direct payments to landlords through Universal Credit (UC)
- Reductions in the amount of subsidy payable to support the costs of the temporary accommodation service
- Impacts on the ability to continue to financially support the key aims of the City Housing Strategy
- Increased demands on homelessness services
- Reduced disposable income in the city's economy due to benefit cuts²
- Greater demands on social care and other relevant front line services
- Greater demand on welfare budgets e.g. Scottish Welfare Fund, Section 12 payments
- Reduced ability to deliver on Corporate objectives e.g. targets on Child Poverty, social housing supply, tackling social exclusion
- Loss of investment in housing from Housing Revenue Account (HRA)
- Increased overall financial pressures for the Council

Individual

- Loss of income for vulnerable people such as those with ill-health or a disability, lone parents, care leavers
- Higher housing costs for people living in social housing
- Increased child poverty with attendant negative impact on educational attainment
- Loss of independence and greater need for care and support services
- Increased financial pressures and potential homelessness

² Estimated at £135m p.a. or £400 p.a. per working age adult – source http://www.scottish.parliament.uk/S4_Welfare_Reform_Committee/Reports/wrR-13-02w.pdf

The Scottish Government has recently published its Strategy on Child Poverty³ whose approach and actions are in line with those of CEC and the Edinburgh Partnership and which is a useful additional reference point for this strategic plan.

Also, in December 2013 the NHS in Scotland produced an Outcome Focused Plan⁴ for mitigating the impact of Welfare Reform and is developing actions both within regional NHS provision and with partners across local authorities.

Need levels

The Institute for Fiscal Studies has modelled the impact on household income of all tax and benefit reforms from January 2010 to April 2015. This study shows that by 2015, the richest 10% of households will have lost almost 8% of their net income, but for the remaining 90% of households the impacts are regressive with households losing a higher percentage of income the poorer they are. For example, the next richest 30% of households lose around 2%, but the poorest 10% of households lose nearly 5% of income on average.

In addition to lower inflation uplift, the main benefit changes for 2013-14 were:

- Housing Benefit Under Occupancy in the social rented sector;
- Benefit Cap
- Scottish Welfare Fund replacing Social Fund crisis loans and community care grants;
- Commencement of phased replacement of Disability Living Allowance by Personal Independence Payments; and

A poverty profile for Edinburgh was produced by the Council's Business Intelligence Unit as part of the work of the Poverty and Inequality Theme Group to define a strategic approach to poverty and inequality through community planning. In common with most other analyses of poverty in the UK and other western economies, the main focus is on poverty as a *relative* rather than an *absolute* concept. However, it is clear that there are a substantial number of households and individuals in the city who experience absolute poverty. The profile uses the definition of relative poverty set out in the European Commission's Joint Report on Social Inclusion in 2004: ***"People are said to be living in poverty if their income and resources are so inadequate as to preclude them from having a standard of living considered acceptable in the society in which they live."***

The threshold for relative income poverty is where total household income is below 60% of the median household income across the UK. Using 2010/11 as a baseline, this means that, after housing costs:

- a single person is in poverty if they are living on less than **£125 per week**;
- a lone parent family with two children are living in poverty if they are living on less than **£258 per week**; and

³ <http://www.scotland.gov.uk/Resource/0044/00445863.pdf>

⁴ <http://www.scotland.gov.uk/Resource/0044/00448578.pdf>

- a couple with two children are living in poverty if they are living on less than **£349 a week**.

On direct measures of poverty, key findings show that Edinburgh is an affluent city on average figures, but that these conceal sharp inequality. The city has one of the highest concentrations of wealthy citizens in Scotland, alongside some of the highest levels of poverty and deprivation. The data for the Edinburgh distribution on income levels is “bi-modal”, showing two clear peaks and concentrations at either end of the spectrum. This contrasts with the pattern in Glasgow, for instance, which is dominated by large numbers of areas at the lower end of the income range. Key findings from Edinburgh’s analysis are set out below.

- Edinburgh is an affluent city, with average household incomes estimated at 9% above the Scottish average.
- Despite this, some 22% of all households in the city live on incomes below the poverty threshold. On this measure, poverty in Edinburgh is slightly higher than the Scottish average. Only four other Scottish local authorities record levels of poverty higher than Edinburgh.
- 18% of all households in the city are considered to live in material deprivation, or are unable to afford several items regarded by a majority of the population as essentials of life in Britain today.
- Overall, the city ranks in the top Scottish quartile for incomes, but in the poorest Scottish quartile for indicators of poverty.
- 24% of all Edinburgh households lived in fuel poverty in 2012. This equates to some 53,600 households in the city.
- People cite the key barriers to escaping poverty through work as the lack of work experience and qualifications, lack of confidence, literacy and numeracy skills, poor interview skills, and caring responsibilities.

Although regeneration programmes have substantially improved the physical surroundings in the poorest areas of the city and reduced concentrations of tenure types there remains a strong geographical differentiation in some areas of multiple deprivation. These locations broadly reflect the former and remaining social housing areas in the city. There is, however, a significant incidence of poverty in all the administrative areas of the city for which statistics are available, including the most affluent.

- In the most deprived areas of Edinburgh, the proportion of households living below the poverty threshold rises to 33%, compared to a city average of only 22%. This level is comparable to the rate recorded in the most deprived parts of Glasgow and almost double the rate recorded across Edinburgh’s least deprived areas.
- 30% of households in deprived areas cannot afford basic items required for an adequate standard of living. This is three times the rate recorded in the least deprived areas.

- 25% of children in deprived areas in Edinburgh live in low income families, compared against only 13% in the least deprived. 18% of Edinburgh's children live below the poverty threshold
- Evidence gathered on the characteristics of individuals in poverty shows that poverty affects individuals across all age groups, and that a significant number of the city's residents have been receiving benefits for 5 years or more.
- The high levels of poverty found in areas such as Muirhouse, Clovenstone and Drumbryden, reflect that over 30% of households are on low incomes, and are similar to the lowest income areas of Glasgow and Dundee. Even in the most affluent areas such as Dean Village and Comely Bank an estimated 12% of households are on low incomes.

In 2014-17 the following changes are forecast:

- Introduction of Universal Credit to Edinburgh (in 2015-16 perhaps)
- Further restrictions on entitlements for under 25s

As the table below indicates, the number of DWP administered benefit claimants in Edinburgh is changing significantly:

Benefit	Feb 2012	Aug 2013	Shift
Job Seeker	11980	9,280	-22%
ESA and incapacity benefits	20890	19,750	-5%
Lone Parent	3500	2870	-18%
Carer	4450	2730	-38%
Bereaved	560	520	-7%

(Source NOMIS) Figures broken down by ward can be obtained from the NOMIS website:

<https://www.nomisweb.co.uk/reports/lmp/ward/contents.aspx>

However, this does not reflect the financial hardship that a significant number of Edinburgh citizens are experiencing as they struggle with reduced incomes, higher fuel and housing costs.

Counter to the DWP benefit decline, the number of Discretionary Housing Payment recipients is showing a very significant increase:

	Feb 2012	Feb 2014	Shift
Housing Benefit	39,702	39,200	-1%
Discretionary Housing Payment	285	3464	+1200%

Outcomes and measures

Outcomes will require to be evaluated through a blend of quantitative and qualitative measures that indicate the impact of actions, strategies and services on population, with particular focus on those whom research has evidenced are most at risk or likely to have their standards of living reduced by welfare reform e.g. women, single parents, people with disabilities and other complex health issues and other barriers. Outcomes are likely to involve measuring the mitigation or prevention of a forecast negative impact which is a complex analytical exercise as many factors are impacting on the city. It is therefore crucial that multiple indicators are assessed rather than a narrowly set group of measures.

It is proposed that all partners identify appropriate monitoring and evaluation frameworks for each element of their work that contributes to the mitigation of the negative impacts of Welfare Reform, particularly those detailed in the Action Plan.

Appendix 1 Shifts in Demand Levels in Advice Services

This table provides indicators of the increase in demands upon the major sources of advice provision in Edinburgh.

This data is backed up by feedback from a number of other advice providers who report increases in demand on their services.

Service		Difference 2012-13 to 2013-14
CHAI	Debt advice	+6%
	Welfare rights	+15%
GIC	Debt advice	+10%
	Welfare rights	-3%
CAE	Debt advice	+10%
	Welfare rights	+9%
	Fuel arrears	+48%
	Employment advice	+11%
Advice Line	Debt advice	+56% ⁵
	Welfare rights	-5%
Advice Shop	Debt advice	+56%
	Welfare rights	-18% ⁶

NOTE: Advice services recording systems and definitions differ between agencies so the above figures should not be directly compared between agencies

⁵ Primarily due to increase in foodbank referrals

⁶ Reduction due to staff issues in 2013-14 Q2-3

Appendix 2 SLAB Funded Projects in Edinburgh

The Scottish Legal Aid Board (SLAB) has established a new funding programme supported by the Scottish Government and the Money Advice Service (MAS). The Making Advice work programme focuses on improving access to advice with a view to promoting achievement of particular priority outcomes and is in addition to the current grant funding programme.

South West Outreach Project SWOP

Partnership between Prospect Housing Association, CEC and CHAI providing welfare rights and housing related advice across South West Edinburgh with outreach sessions in 5 locations.

Cyrenians & EHAP

Partnership between Edinburgh Cyrenians, CHAI and Granton Information Centre to provide welfare rights and housing related advice.

RSLs partnership

Partnership led by Dunedin Canmore with Port of Leith and Hillcrest housing associations. Two Welfare Rights Officer posts providing a welfare rights service to tenants of the three HAs.

Link HA

One Welfare Rights Officer and one trainee who provide a money advice and welfare rights service to Link, Barony and Horizon Housing Association tenants.

Advice Shop

Partnership with Citizens Advice Edinburgh and Community Learning and Development team, 2.5 Welfare Rights Officers posts providing outreach through five CAB. Also appointments and drop-in available at 5 locations for CLD staff to assist claimants with completion of benefit application forms.

Shelter Scotland

Provide money and benefits advice to the travelling community delivered by two advisers.

Scottish Welfare Fund

The SWF is a new scheme that was introduced in April 2013. In Scotland it is a national single scheme that is being administered by Local Authorities and replaces elements of the Social Fund that was administered by the Department for Work and Pensions (DWP).

It has fast become a recognised source of emergency assistance and support for resettlement. Providing both Community Care Grants for household items such as cookers, beds, fridges for people moving into or seeking to sustain accommodation, and Crisis Grants for emergency essential items such as food and fuel, the SWF in Edinburgh has supported 6599 people in its first 12 months.

Changes to Scottish Government guidance have enabled a more flexible approach to assessing claims and managing expenditure so that the fund can spend to budget for the year. Crisis Grants remain under spent though the number of applications has steadily risen as Scottish Government recently relax the restrictions that were previously in place therefore monthly expenditure is increasing. Every effort continues to be made to utilise the fund so that customer needs can be met. The SWF plays a crucial role in facilitating the links between vulnerable customers and those with repeat crises and the array of services available to support people with financial, health and other problematic issues.

Discretionary Housing Payments (DHP)

DHP provides temporary financial assistance with housing costs to tenants who are receiving Housing Benefit and/or Council Tax Reduction. The DHP Policy confirms when DHP will, may and will not be paid.

The 2013/14 DHP budget was increased significantly by Scottish Government. It can now operate in a flexible and comprehensive manner, providing support to a wider range of customers and for longer periods than before.

The DHP total spend from 1 April 2013 to 31 March 2014 was £3.2m. This compares to a total spend of £411k in 2012/13. As at 31 March 2014 4,930 private and social rented sector tenants were assisted, the majority of those have been affected by Under Occupation.

2012/13

DHP Budget 01 April 2012 to 31 March 2013	£570,286
DHP Spend 01 April 2012 to 31 March 2013	£411,735
Percentage of Budget Spent	72%

2013/14

DHP Budget 01 April 2013 to 31 March 2014	£3,555,182 (over 500% increase from 2012/13)
DHP Spend 01 April 2013 to 31 March 2014	£3,255,073 (over 700% increase from 2012/13)
Percentage of Budget Spent	92%

2014/15

DHP Budget 01 April 2014 to 31 March 2015	£3,833,120 (8% increase from 2013/14)
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Rent Service Redesign Programme

The HRA Business Plan identified a potential shortfall in income due to the estimated impacts of welfare reform. Around £58 million (65%) of the rental income to the HRA is collected through Housing Benefit and the planned changes put that income at significant risk

A programme is underway to redesign the rent service to ensure that HRA income is protected from 2013/14 onwards in the face of changes brought about by Under Occupancy and Direct Payments/Universal Credit

Advice Services

There is substantial provision of welfare benefits and debt advice services in the city which provide essential support to thousands of Edinburgh citizens every year. There is a need for an overarching strategic plan to help coordinate these services and ensure that needs are met through targeted, outcome-focused provision.

Edinburgh Council provides substantial services through the Advice Shop and funds organisations such as Citizens Advice Edinburgh, CHAI, Granton Information Centre and Community Ability Network through third party grants. Other organisations such as RSLs, housing support providers and social care services contribute significantly toward the advice provision.

The Scottish Government has recognised the value of advice provision through its new Making Advice Work programme which has funded 6 projects⁷ in Edinburgh since October 2013. Together with Edinburgh Council's own investment in advice services and the expansion of advice provision has been a welcome addition to mitigate the impact of welfare reform.

⁷ See Appendix 2

The main sources of welfare benefits and debt advice in the city are:

- CEC Advice Shop
- Citizens Advice Edinburgh
- Community Help and Advice Initiative (CHAI)
- Granton Information Centre (GIC)
- Community Ability Network (CAN)
- RSLs – Dunedin Canmore, Prospect, Port of Leith and Castlerock Edinvar

In addition CEC provides advice through many teams within Housing, Criminal Justice Social Work, Throughcare and Aftercare, Mental Health, Substance Misuse and Community Based Support.

A welfare benefits and debt advice strategy would provide clarity on the needs and provision in the city and support development of services across the Council and voluntary sector. The role of the third sector, CEC and NHS services, funding arrangements through third party grants and the input of the Edinburgh Partnership must all be considered here.

Employability Services

The Council, statutory and voluntary sector partners work in a strategic partnership with Joined up for Jobs, to deliver integrated employability services in local communities across the city. The defined outcomes for sustainable employment and training outcomes are detailed in the City of Edinburgh Council's Economic Strategy for 2012-2017 which focuses on sustainable economic growth through investment in jobs.⁸

The Integrated Employability Service provides four community based hubs with one in the city centre to support individuals to progress towards sustainable employment outcomes. Case workers will also help identify barriers to progression and support a client to consider positive actions including work or volunteering placements, vocational training, literacy and core skills, to increase their longer term employment prospects and economic well being. Clients are assessed on the basis of the Strategic Skills Pipeline framework⁹ which helps to outline the proportions of clients presenting to local services affected by additional barriers and challenges, including benefits issues, debt, housing, health and disabilities.

These services are promoted by the Council under the Get On branding and customers are encouraged to use the Employability Helpline, visit the Mobile Unit or send in their details online to register for services.

⁸ [A Strategy for Jobs - The City of Edinburgh Council's Economic Strategy for 2012-17 - Economic Strategy 2012 - 2017 - City of Edinburgh Council](#)

⁹ [Strategic Skills Pipeline](#)

Voluntary sector

The contribution of the voluntary sector to the achievement of Edinburgh partnership objectives is very significant. While CEC commissions dozens of voluntary sector organisations to provide a range of services in areas such as homelessness prevention, employability, housing advice and support, social care, health and advice, these and other voluntary sector organisations provide an enormous range of services funded through other sources which also contribute to Edinburgh Partnership's strategic objectives. Many of these benefit from a greater degree of flexibility to respond to shifting customer needs and provide innovative services that are tailored to the communities they serve.

NHS Lothian

An Outcome Focussed Plan has been devised by NHS Lothian to mitigate the impact of Welfare Reform across services and communities. The plan links specific actions to well-established Strategic Outcomes to reduced health inequalities and improve healthy life expectancy. There are a number of actions in the plan that NHS Lothian has already developed and is implementing, these include:

- Provision of literacy, numeracy, financial literacy and IT support classes for employees, as well as promotion of the Money Advice Service;
- Development of an intranet and internet page on Welfare reform;
- Working in partnership to develop mitigating actions locally with Neighbourhood Partnerships and across the city;
- Provision of face to face and on-line welfare reform awareness raising sessions and training;
- Providing evidenced based vocational rehabilitation services;
- Providing evidenced based employability programmes such as The Works; and
- Gathering feedback and intelligence to document impact of welfare reform on health and NHS services.

One specific area being addressed is to reduce the stigma of claiming benefits so that customers can access financial and other assistance that impacts positively on their health.

NHS Lothian staff are working closely with services connected to NHS provision to ensure that for example, patients attending GP surgeries have access to benefits and debt advice. NHS Lothian staff are also engaging with CEC in strategic planning and partnership fora.

Department for Work and Pensions (DWP)

The DWP has a major role to play in ensuring that Welfare Reform implementation is coordinated with local provision and to engage with councils and other key stakeholders to do so. In Edinburgh the DWP has committed resources to work in partnership with regard benefit changes such as the introduction of the Benefit Cap and planning for the implementation of Universal Credit.

Skills Development Scotland (SDS)

SDS is playing a crucial role in supporting and coordinating CEC actions to improve employment options and employability initiatives.

Glossary of abbreviations

C&F	Children and Families
CAB	Citizens Advice Bureau
CAE	Citizens Advice Edinburgh
CAN	Community Ability Network
CEC	City of Edinburgh Council
CG	Corporate Governance
CHAI	Community Help and Advice Initiative
CLD	Community Learning and Development
COSLA	Convention of Scottish Local Authorities
DHP	Discretionary Housing Payment
DWP	Department of Work and Pensions
ED	Economic Development
EHAP	Edinburgh Housing Advice Partnership
EP	Edinburgh Partnership
ESA	Employment and Support Allowance
GIC	Granton Information Centre
HA	Housing Association
HRA	Housing Revenue Account
HSC	Health and Social Care
MAS	Money Advice Service
NHS	National Health Service
OD	Organisational Development
PRS	Pre-Referral Screening
RSL	Registered Social Landlord
SOA	Single Outcome Agreement
SDS	Skills Development Scotland
SfC	Services for Communities
SLAB	Scottish Legal Aid Board
SMT	Senior Management Team
SWF	Scottish Welfare Fund
SWOP	South West Outreach Project
UC	Universal Credit
WRO	Welfare Rights Officer

Corporate Policy and Strategy Committee

10.00am, Tuesday 30 September 2014

Corporate Debt Policy – annual update

Item number	7.3
Report number	
Executive/routine	
Wards	

Executive summary

In approving the Corporate Debt Policy on 3 September 2013, the Corporate Policy and Strategy Committee requested that an annual update of relevant activity also be reported going forward. This report is the first such update and sets out a range of actions undertaken during the past year to strengthen and embed the provisions within the policy.

Links

Coalition pledges	P30
Council outcomes	CO25 , CO26
Single Outcome Agreement	

Corporate Debt Policy – annual update

Recommendations

- 1.1 Members of the Corporate Policy and Strategy Committee are requested to note:
 - 1.1.1 the good progress made in building on and embedding a number of the good-practice principles underpinning the policy; and
 - 1.1.2 the intention to present to Council an updated policy, incorporating a number of minor changes to the level of late-payment fees and relevant responsible officers, as part of a wider governance update later in the year.

Background

- 2.1 As a key element of the Council's governance framework, the Corporate Debt Policy was approved by the Corporate Policy and Strategy Committee on 3 September 2013. The policy outlines operational debt recovery activities for a range of debt types, including Council House rent arrears, Council Tax, service charges, Non-Domestic Rates, parking charges and any benefit and salary overpayments.
- 2.2 Customers, citizens and businesses within Edinburgh have a responsibility to pay for the services they receive and the charges and rents for which they are liable. It is essential that all monies owed to the Council are actively pursued. The policy therefore reflects a range of measures to help customers pay sums due, maximising the level of resources available to support frontline public services.
- 2.3 In approving adoption of the policy, the Committee requested that a brief annual report be prepared going forward, taking into account any relevant changes in legislation, service improvements, regulations and wider policy initiatives. The following sections outline the extent of progress and/or change across these areas. In so doing, it is important to emphasise that in many cases, service improvements form part of a wider programme of co-ordinated activity, particularly in the case of the Council's response to welfare reform-related changes. In addition, while good progress has been made thus far, it remains too early to assess fully the effectiveness of the more co-ordinated approach the policy seeks to promote.
- 2.4 A number of minor required changes in respect of the level of Council Tax and Non-Domestic Rate late-payment fees, as well as to relevant officer roles, have been identified. It is therefore proposed that a revised policy be submitted for

approval later in the year as part of a wider refresh of the Council's governance framework.

Main report

- 3.1 The Corporate Debt Policy continues to be underpinned by the following key principles:
- (i) taking early and co-ordinated debt recovery action before debts become unmanageable for the customer;
 - (ii) taking account of all relevant circumstances relating to the debt;
 - (iii) offering a range of payment methods to make it easier to settle debts;
 - (iv) providing links to debt advice; and
 - (v) adopting a debt hierarchy that prioritises those debts where non-payment could directly impact on an individual's wellbeing.
- 3.2 The policy also emphasises the importance of proportionality i.e. striking an appropriate balance between the potential loss of income to the Council and the costs of recovery and any emerging Council or third party costs relating to welfare, care or housing support. This holistic approach, coupled with the extent of customer insight and stakeholder engagement underpinning the policy's development, was specifically highlighted as an area of good practice within the Customer Service Division's successful Customer Service Excellence (CSE) re-accreditation in March 2014. Building on this more rounded overall picture of the Council's debt, proposals to join up further the collection of all income streams are being examined.

Collection performance

- 3.3 The principle of recognising the overarching duty to pay whilst acknowledging the particular circumstances of the debtor was built into the recent sheriff officer tendering process, with a suite of performance measures aligned to these aims also developed. One of the key areas in which the existing sheriff officer contract has yielded particular benefits is Council Tax collection, helping to bring in some £12.5m of income for 2013/14 alone. Alongside an acceleration of recovery procedures, intervening before arrears escalate, and an organisational restructuring to create dedicated teams focusing specifically on collection, this activity contributed to achievement of the highest-ever in-year Council Tax collection rate in 2013/14.
- 3.4 The Corporate Debt Policy is based on a measured response to debt recovery. It is recognised, however, that a small proportion of the Council's overall income may not be collectable due to matters outside its control. In accordance with the policy, an annual report of debt write-off activity was therefore considered by the Finance and Resources Committee on 28 August, in which it was noted that of

sums due in 2013/14, only a comparatively low proportion of 0.9% had been written off. Even where sums are written off, however, the Council will still pursue the recovery of these debts should the debtor be traced or become solvent, with a demonstrated ability to pay.

- 3.5 In maximising the level of income received by the Council, staff involved in corporate debt recovery roles also now have access to the Accounts Receivable system, allowing them to check for any outstanding debts when lodging insolvency claims. By identifying instances of multiple debts, the Council will receive a greater dividend in case of subsequent recovery. Sundry debt-related enquiries are now handled in the first instance through the Contact Centre, with other staff therefore able to focus on more complex cases.
- 3.6 The sheriff officer considers multiple debt streams when agreeing payment arrangements, applying the Council's agreed hierarchy of debt i.e. prioritising former housing rent arrears and tenancy-related charges, in so doing.
- 3.7 The Income Team within Corporate Governance is also working in partnership with an external provider in profiling the entire caseload and determining the likelihood of payment based on financial information not available to local authorities. Once this debt has been profiled, cases will be graded under their propensity to pay into high, medium and low opportunities and recovery will be prioritised on this basis.
- 3.8 At this point, the optimal approach to maximising recovery levels will be agreed, ensuring the approach is measured and appropriate to the level of debt outstanding. It is anticipated this profiling exercise will be concluded in September. A further update will be issued to members once the profile has been applied to the caseload and details are available on the outcome of this recovery activity in January 2015.
- 3.9 The Council is also putting in place a number of measures to increase overall collection rates by reducing the level of debt arising in the first place, including the roll-out of charging in advance wherever practicable.

Increasing awareness

- 3.10 A number of steps have also been taken to increase general awareness of the Corporate Debt Policy's contents. In addition to being published on the Council's website, summarised versions of sections of particular relevance to specific staffing groups have been developed. The policy's main principles and provisions have also been reflected in the Council's fully-updated Finance Rules which translate the high-level principles outlined in the Financial Regulations into more operational procedures.
- 3.11 Following the creation of a dedicated income accountant role as part of the recently-completed Financial Services organisational review, further work will be undertaken both to embed the policy within the Council and publicise its contents more widely. This will include renewed publicising of the policy's

contents to elected members, Registered Social Landlords and anti-poverty groups.

Money management and debt advice

- 3.12 While it should be emphasised that the principles set out within the Corporate Debt Policy are intended to be of general applicability and not reflect specific economic circumstances, there are nonetheless clear links to activity being undertaken in other areas, particularly co-ordinated action in respect of welfare reform. As set out in the series of bi-monthly updates considered by this Committee, the Council has continued to seek to maximise benefit take-up, in addition to active promotion of (and simplified application procedures for) the Scottish Welfare Fund (SWF) and Discretionary Housing Payments (DHPs). Alongside targeted advice and support from staff in Neighbourhood Offices and the Council's Welfare Reform Team, these actions have delivered significant benefits; the number of tenants affected by the Underoccupancy regulations who were in arrears, for example, reduced by a third between August 2013 and May 2014.
- 3.13 The policy also places significant emphasis upon increasing financial literacy. The Council continues to offer tailored advice from both the Advice Shop on the High Street and a network of surgeries across the city, as well as supporting, by means of grant funding, a number of local initiatives in areas of higher need. These local services have a particular role in offering people alternatives to the use of payday lenders. To this end, in addition to encouraging applications for SWF and DHP support, the Council has continued to publicise the services of the city's credit unions and basic bank accounts. A dedicated welfare reform advice line has also recently been established.

Measures of success

- 4.1 To ensure the Corporate Debt Policy achieves its objectives, a range of performance indicators has been developed to monitor performance against targets.
- 4.2 As noted at 3.3 in the main report, the in-year level of Council Tax collection for 2013/14 was the highest achieved since the Council's formation in 1996, with improvement also apparent in the cumulative, five-year rate. This performance was achieved at the same time as a reduction in the associated collection cost. The in-year collection rate for Non-Domestic Rates, however, showed a slight decrease compared to 2012/13.
- 4.3 Aged debtor analysis conducted at 31 March 2014 indicated a slight decrease in the overall proportion of debt that had been outstanding for ninety days or longer.

- 4.4 The Council also continues to conduct customer surveys and mystery shopping for a sample of relevant services and across the piece, these indicate good performance in both staff's technical competence and wider customer care skills.

Financial impact

- 5.1 The recovery actions detailed in the Policy are responsible for the collection of over £600m of income annually. Maximisation of collection rates increases the overall level of resources available to support frontline service delivery. Streamlining of associated administration and efficiencies in sheriff officer and other debt recovery activity also contribute towards delivery of the Council's overall savings requirements.

Risk, policy, compliance and governance impact

- 6.1 Approval and regular updating of the Corporate Debt Policy promotes consistency and transparency across all aspects of recovery activity.

Equalities impact

- 7.1 There are no additional equalities- and rights-related impacts arising from the report's contents. The policy approved in September 2013 was, however, subject to extensive engagement with relevant equality groups.

Sustainability impact

- 8.1 There are no direct sustainability impacts as a result of this report.

Consultation and engagement

- 9.1 Consultation with elected members, council officers, equalities and anti-poverty groups was undertaken and the resulting feedback included in the final policy approved by the Corporate Policy and Strategy Committee in September 2013. The policy also took account of a number of recommendations made by Internal Audit in this area.
- 9.2 As noted in the main report, the extent of customer insight and engagement was highlighted as an area of good practice as part of the Customer Services Division's recent Customer Service Excellence re-accreditation.

Background reading/external references

[Compliance, Risk and Governance: Corporate Debt Policy](#), Corporate Policy and Strategy Committee, 3 September 2013

[Crackdown on Legal Loan Sharks – Payday Lending](#), Corporate Policy and Strategy Committee, 10 June 2014

[Welfare Reform – further update](#), Finance and Resources Committee, 28 August 2014 (this is the most recent bi-monthly report considered by both the Corporate Policy and Strategy and Finance and Resources Committee)

[Annual Report – Debt Write-Off](#), Finance and Resources Committee, 28 August 2014

Alastair D Maclean

Director of Corporate Governance

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Links

Coalition pledges	P30 – Continue to maintain a sound financial position including long-term financial planning
Council outcomes	CO25 - The Council has efficient and effective services that deliver on objectives. CO26 - The Council engages with stakeholders and works in partnership to improve services and deliver on agreed objectives.
Single Outcome Agreement	n/a
Appendices	None

Corporate Policy and Strategy Committee

10am, Tuesday, 30 September 2014

Information Governance Policies

Item number	7.4
Report number	
Executive/routine	
Wards	All

Executive summary

Information is a key asset for the Council. It needs to be managed effectively to maximise value for the Council and its stakeholders, and to manage related risks.

The Council has developed an Information Governance Strategy. A framework is now being developed as part of this Strategy to help services manage their information more effectively and to mitigate information risks.

The development of this suite of Information Governance policies detailing responsibilities and requirements helps ensure compliance with legislative, regulatory and best practice standards.

Links

Coalition pledges

Council outcomes

Single Outcome Agreement

Information Governance Policies

Recommendations

- 1.1 To note the Information Governance Strategy set out in appendix 1 of this report; and
- 1.2 To approve the Information Governance policies set out in appendices 3 to 7 of this report.

Background

- 2.1 Information is a key asset for the Council. It is central to the Council's business processes, decision making and service delivery. It also provides evidence and ensures accountability for Council actions and performance. It is crucial that information is managed effectively to maximise value for the Council and its stakeholders, and to manage related risks.
- 2.2 The effective management of information places significant demands on the Council. In particular, there is a wide ranging, dynamic and complex legal landscape in which the Council has to operate. Appendix 1 (part A) details the principal acts, regulations, codes of practice and technical standards concerning information governance.
- 2.3 Compliance with this range of legislation is monitored through various external regulators, including the Scottish Information Commissioner and the Information Commissioner. The latter, in particular, has a wide range of enforcement powers if organisations are found to breach the Data Protection Act. These include powers to impose monetary penalties of up to £500,000 for each breach. The number of organisations, including local authorities, receiving monetary penalties has continued to increase in 2013-14. (<http://ico.org.uk/enforcement/fines>)
- 2.4 In March 2015, the Information Commissioner's Officer (ICO) will undertake a voluntary audit of the Council's arrangements for complying with the statutory requirements of the Data Protection Act 1998 and best practice guidance issued by the ICO. This will involve a comprehensive review of the Council's protection policies, procedures and processes, including how these are followed and quality assurance within the Council.
- 2.5 The Council will not be subject to any enforcement actions resulting from any non-compliance or breaches of the legislation discovered through the audit process. However, where compliance issues and shortcomings are identified,

the ICO will conduct a follow-up audit to ensure that improvement actions have been implemented.

- 2.6 To help prepare for the ICO audit and to ensure the efficient and effective management of Council information, an Information Governance strategy, outlined in appendix 1, has been developed and agreed with the Corporate Management Team (CMT).
- 2.7 Information Governance provides a coherent approach and structure that brings together all the legislative and regulatory requirements, standards and best practice in relation to data quality; information compliance (including data protection and freedom of information); information security; information sharing; open data; and records management. Overall, it ensures that the Council is creating, managing, using, sharing and disposing of information efficiently, appropriately and lawfully.
- 2.8 A key element of the Information Governance Strategy is the establishment of an Information Council to provide the necessary ownership and advocacy function to support, co-ordinate, promote, monitor and assure the development and delivery of effective information governance.
- 2.9 The Information Council is leading the development of an information governance framework for the Council. The framework consists of policies, standards, guidance and tools including details about how they will be implemented, measured and assured. The framework will provide the Council with a coherent structure to ensure that legal and best practice standards are met and continuously assessed.

Main report

- 3.1 Each Information Governance area has a top level policy, outlined in paragraphs 3.4- 3.8 below. Each policy clearly sets out roles, responsibilities and requirements to ensure compliance with legislative, regulatory and best practice standards.
- 3.2 All policies will be available on the Council's Policy Register and reviewed on annual basis by CMT and Committee.
- 3.3 Policies concerning Information Security and Open Data are covered through the Council's [ICT Acceptable Use Policy](#) and the [Open Data Strategy](#) respectively. Information sharing which is mostly concerned with the sharing of personal information is included as part of the Data Protection Policy.
[Information Governance Policy \(Appendix 2\)](#)
- 3.4 This policy formalises the Council's overall approach to information governance by detailing the various elements of the Information Governance framework, and

the methodology that will be adopted and developed to ensure compliance with that framework.

[Data Protection Policy \(Appendix 3\)](#)

- 3.5 This policy sets out and formalises the Council's approach for ensuring that personal information is properly processed, managed and protected in accordance with the requirements of the Data Protection Act 1998. It outlines the Council's commitment to the principles enshrined within the Act and the need to balance the rights of individuals with the functions and operational requirements of the Council.

[Data Quality Policy \(Appendix 4\)](#)

- 3.6 This policy confirms the Council's commitment and approach to improving the quality of its data. It sets out a number of key principles around data collection, management and presentation. The policy recognises that the Council needs reliable, relevant, accurate and timely data to facilitate service delivery and improvement and to account for its performance.

[Freedom of Information Policy \(Appendix 5\)](#)

- 3.7 This policy formalises the Council's approach to the management and release of information in accordance with the provisions of the Freedom of Information (Scotland) Act 2002, the Environmental Information (Scotland) Regulations 2004, and the INSPIRE (Scotland) Regulations 2009. It sets out the Council's commitment to openness, transparency and accountability and to up-holding the information rights of individuals.

[Records Management Policy \(Appendix 6\)](#)

- 3.8 This policy sets out the baseline requirements and actions for effective records management, ensuring that records properly support and underpin the effective operation and management of the Council, including compliance with the Public Records (Scotland) Act 2011.

Procedures and guidance

- 3.9 Corporate procedures and guidance have been developed and made available on the ORB to support staff in implementing and complying with agreed policies. These will be revised and communicated on a regular basis to reflect any changes in legislation, standards and best practice. Where appropriate, local procedures will also be developed or quality assured by the Council's Information Governance Unit to reflect local needs and conditions.

Training

- 3.10 Training, education and awareness are essential to ensure compliance with policies and procedures, as well as promoting a culture of corporate responsibility that values information as an asset.

- 3.11 A training programme and series of awareness raising sessions have been scheduled over the next 12 months to ensure that all staff are aware of their responsibilities in using and managing Council information. The programme will be delivered at an appropriate level to all staff using e-learning and other delivery mechanisms.
- 3.12 Training on this suite of policies, once agreed, will also form part of the Council's key mandatory policy awareness programme, and will be a mandatory component of the Council's induction process for all new staff, going forward.

Measures of success

- 4.1 Many elements of information governance have key performance indicators in place to ensure service delivery meets statutory and policy requirements (e.g. freedom of information and data protection). However, information governance contains elements which are less tangible to measure, such as cultures and behaviours.
- 4.2 To provide a more complete measure of success and improvement, an information governance maturity assessment will be developed to determine progress on an annual basis against the Council's Information Governance Framework and associated policies.

Financial impact

- 5.1 Failure to comply with the requirements of the Data Protection Act 1998 could result in enforcement action by the Information Commissioner's Office, including imposition of a civil monetary penalty that could result in a fine of up to £500,000 for each breach.
- 5.2 Failure to identify and apply appropriate retention rules to Council records could result in excessive and unnecessary physical and IT storage costs.

Risk, policy, compliance and governance impact

- 6.1 Impacts could be severe, including: distress or harm to individuals or organisation; reputational damage to the Council; detrimental impact on Council business and service delivery; and non-compliance with legislation and potential litigation.

Equalities impact

- 7.1 There are no adverse equalities issues arising from this report.

Sustainability impact

8.1 There are no sustainability issues arising from this report.

Consultation and engagement

9.1 The suite of policies has been developed in consultation with all service area representatives across the Council who are members of the Information Council.

Background reading/external references

[Public Records \(Scotland\) Act 2011](#)

[Freedom of Information \(Scotland\) Act 2002](#)

[Environmental Information \(Scotland\) Regulations 2004](#)

[INSPIRE \(Scotland\) Regulations 2009](#)

[Data Protection Act 1998](#)

[Office of the Scottish Information Commissioner](#)

[Information Commissioner's Office](#)

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Links

Coalition pledges

Council outcomes

Single Outcome Agreement

Appendices:

[Appendix 1 – Information Governance Strategy](#)

[Appendix 2 – Information Governance Policy](#)

[Appendix 3 – Data Protection Policy](#)

[Appendix 4 – Data Quality Policy](#)

[Appendix 5 – Freedom of Information Policy](#)

[Appendix 6 - Records Management Policy](#)

Appendix 1 – Information Governance Strategy

Introduction

Information is a key asset for the Council. It is at the centre of the Council's business processes, informs and shapes decision making, helps with the delivery of quality customer services, provides evidence and accountability of our actions, and lets us know how we are performing.

Like any other asset, such as property, finance and people, information has to be managed effectively to stop it becoming a liability and risk, and to ensure we can maximise its value for the Council and our stakeholders. Failure to manage information appropriately can lead to reputational loss and considerable financial penalties.

The effective management of information places significant demands on the Council. In particular, there is a wide-ranging and complex legal landscape within which the Council has to operate. Appendix 1A details the many acts, regulations, codes of practice and technical standards concerning information governance.

Vision

To operate effectively within this landscape the City of Edinburgh Council needs to:

- Embed a culture of confidence and responsibility in managing information to provide a consistent and improved service for our customers;
- Provide clear leadership, training and awareness to empower all staff to handle information effectively and to identify opportunities for improvement and transformation; and
- Ensure the Council's information governance arrangements are continuously assessed, co-ordinated, improved and assured to manage risk, meet compliance standards and drive efficiencies.

How do we do this?

To achieve this we need effective information governance. Information Governance is the assurance we have as a Council that we are managing our information efficiently, appropriately and lawfully. This includes how we create, manage, use, share, and dispose of information, incorporating the areas of:



Definitions:

Data quality	Ensures that the Council's information is accurate, reliable, relevant and up-to-date.
Information security	Ensures that Council information is not compromised by unauthorised access, modification or loss.
Information compliance	Ensures compliance with all legislation that is relevant to the management of information, including rights of access under freedom of information and data protection legislation.

Records management	Ensures that Council information is systematically controlled and maintained, and includes arrangements for storing, managing, accessing, using and disposing of records, in compliance with legal and policy requirements.
Information sharing	Ensures that Council information is shared in a secure and controlled manner.

Information Council

While managing information is the responsibility of all staff, an Information Council has been established to provide the necessary ownership and advocacy function to support, co-ordinate, promote, monitor and assure the development and delivery of effective information governance.

The Information Council will consist of senior officers representing all directorates of the Council, ICT Solutions and those with corporate responsibilities for information governance. The Council will be chaired by the Council's Governance Manager who will report to the Director of Corporate Governance (who is designated as the Council's Senior Information Risk Owner), the Council Management Team and Elected Members.

The Information Council will:

- Provide strategic leadership for information governance and information risk management throughout the Council.
- Support the development of the Information Governance Framework, including an annual maturity assessment to measure progress and improvement.
- Support, monitor and approve the annual information governance improvement plan, including plan revision and realignment to mitigate risk.
- Take ownership of the information risk management approach, including monitoring compliance with the Information Governance Framework and highlighting information risks.
- Receive and consider reports into breaches of confidentiality and security and, where appropriate, undertake or recommend remedial action.
- Develop solutions and implementation programmes to ensure that the Council complies with developing information governance requirements.
- Support directorates with the implementation of information governance standards, policies and controls.
- Support audit and assessment arrangements for information governance.

- Ensure that Council's approach to information governance and information risk is effective in terms of resource, commitment and execution.
- Create, direct and support subsidiary Council groups (e.g. Data Council) in developing, maintaining and complying with the Information Governance Framework.
- Liaise with other working groups and programme boards to ensure compliance with the Council's Information Governance Framework.
- Provide a focal point for the resolution and/or discussion of information governance issues.

Information Governance Framework

A core activity of the Information Council and a central part of this strategy is the establishment of an information governance framework. This will provide the Council with a robust and coherent structure to realise the information governance vision, as well as ensuring that legal requirements and best practice standards are met.

The framework forms part of the Corporate Governance Service Plan and will consist of policies, standards, guidance and tools, and details about how they will be implemented and assured.

Information Governance Action Plan

The Information Governance Framework and wider strategy will be delivered through an Action Plan. This will be approved and monitored by the Information Council on an annual basis. The Plan will include policy, guidance and tools development, as well as assessments, feedback and regular communications. The Plan will be flexible enough to incorporate risk mitigation, transformation programmes and business improvement opportunities, ensuring that resource can be directed to where it is most needed.

Information risk management

There are significant risks to the Council if information is not managed properly. The Information Governance Framework will build on the corporate risk approach to ensure that information risks are identified, assessed and managed. In particular, the delivery of training, education and awareness will be required to ensure staff can identify and treat information risks.

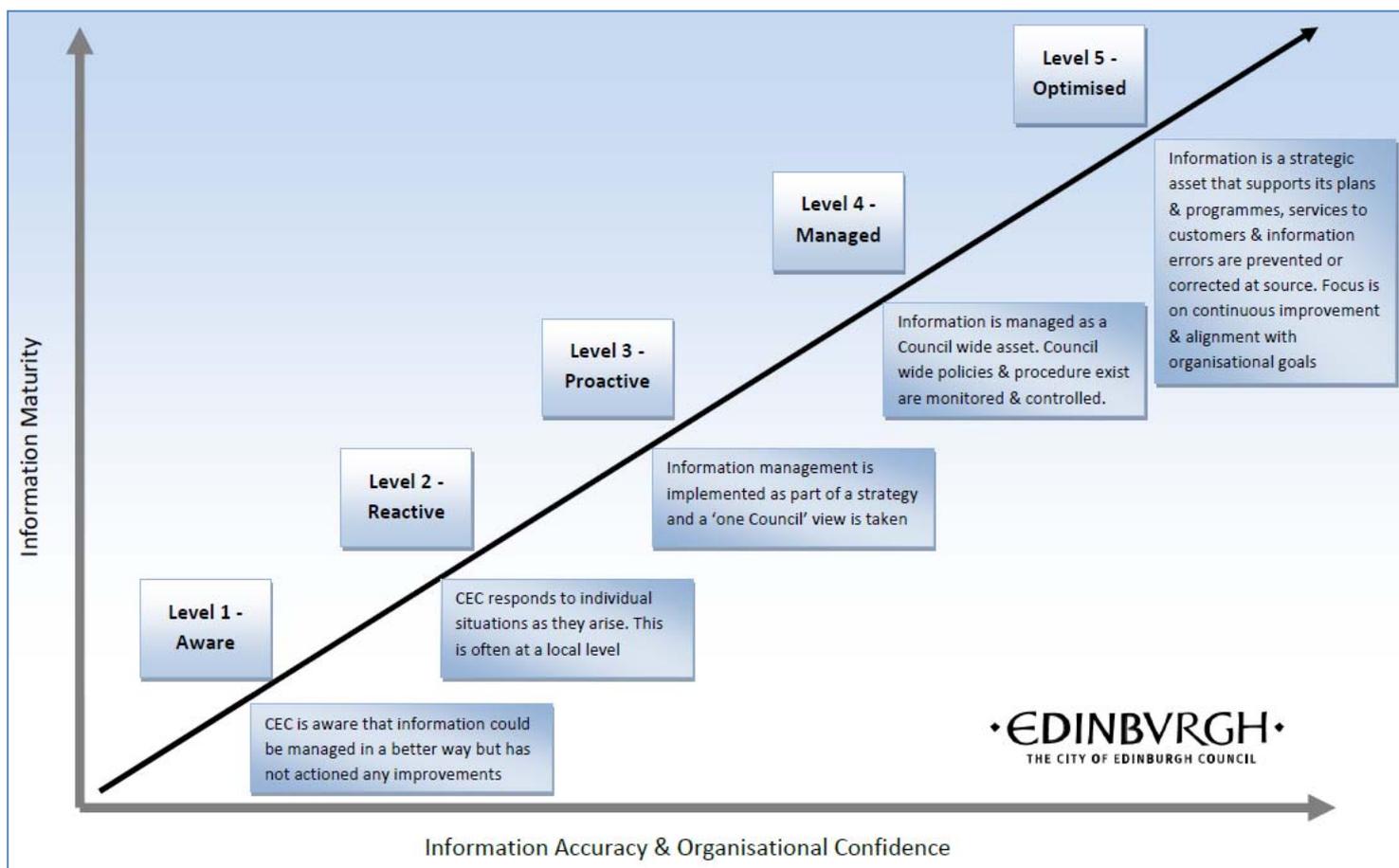
How will this be measured?

All the projects and areas of work required to deliver this strategy will have performance measures in place to ensure delivery meets quality requirements in line with the action plan. Progress will be presented to the Information Council as a matter of routine, and regularly highlighted to the Council Management Team and Elected Members.

This strategy also contains elements which are less tangible to measure such as cultures and behaviours. To provide the Council with a more complete picture of what effective information governance should look like, an Information Governance Maturity Model will be used to determine progress against this strategy. Overall success will be determined by improvement in maturity and evaluated over a five year period.

A detailed model will be developed as part of this strategy and based on the UK Government's Information Assurance Maturity Model.

Information Governance – Basic Maturity Model



Responsibilities

Overall responsibility for delivery of this strategy will lie with the Governance Manager with support from the Information Council. However, to implement the Council's vision for information governance, everyone from front line staff to senior managers must understand their role and responsibilities when managing Council information. This will help to create clear lines of leadership and accountability, as well as promoting a corporate culture where information is valued and assured.

Specific responsibilities will be clearly highlighted in the policy documents that will form part of the Information Governance Framework.

Appendix 1A – Information Legislation

Information management underpins all European, UK and Scottish legislation, regulation and guidance that affects, directs or empowers the City of Edinburgh Council. As a result, a definitive list of all such relevant legislation, regulations and standards would be too long to be useful here. Key documents, however, in relation to Scottish local government and the management of information management are detailed below:

Key Acts of the UK Parliament
<u>1973 c.52 Prescription and Limitation (Scotland) Act 1973</u>
<u>1973 c.65 Local Government (Scotland) Act 1973</u>
<u>1985 c.43 Local Government (Access to Information) Act 1985</u>
1990 c.18 Computer Misuse Act 1990
<u>1994 c.39 Local Government etc. (Scotland) Act 1994</u>
1998 c.29 Data Protection Act 1998
Key Acts of the Scottish Parliament
2002 asp. 13 Freedom of Information (Scotland) Act 2002
<u>2003 asp. 01 Local Government in Scotland Act 2003</u>
<u>2011 asp. 12 Public Records (Scotland) Act 2011</u>
Key Statutory Instruments of the UK Parliament
<u>S.I. 2005 / 1515 The Re-use of Public Sector Information Regulations, 2005</u>
Key Statutory Instruments of the Scottish Parliament
<u>S.S.I. 2003 / 581 The Pupil's Educational Records (Scotland) Regulations</u>
<u>S.S.I. 2004 / 520 Environmental Information (Scotland) Regulations</u>
Key Statutory Codes of Practice
Section 60 Code of Practice: Function under FOI(S)A
Section 61 Code of Practice: Records Management and FOI(S)A
Key International & British Standards
ISO 15489: 2001 Information and Documentation - Records Management
ISO 16175 Principles and functional requirements for records in electronic office environments
ISO 23081 Metadata for records
ISO 27001 Information Security Management
ISO 30300 & 30301 Management Systems for Records

BS10008 Evidential Weight and Legal Admissibility of Electronic Information

2002 asp. 13 Freedom of Information (Scotland) Act 2002

<u>2003 asp. 01 Local Government in Scotland Act 2003</u>

<u>2011 asp. 12 Public Records (Scotland) Act 2011</u>
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Appendix 2 - Information Governance Policy

Policy statement

- 1.1 This policy sets out the Council's information governance (IG) framework to ensure that information is effectively managed and properly protected. It also clearly defines the roles and responsibilities of all stakeholders involved in handling and managing Council information.
- 1.2 The IG strategy provides the overall direction and vision for information governance within the Council, including the development of an IG policy and framework.

Scope

- 2.1 This policy applies to:
 - 2.1.1 All information held, maintained and used by the Council in all locations and in all media (paper and electronic);
 - 2.1.2 Elected Members, Council staff, including temporary staff, contractors, consultants and volunteers that access and use Council information; and
 - 2.1.3 All third parties that manage and process information on the Council's behalf when carrying out a statutory Council function or service.

Definitions

- 3.1 [Appendix 2A](#) provides a glossary of terms and definitions commonly used in relation to IG. The definitions below concern specific terms and descriptions used in this policy.
 - 3.1.1 **Archives:** records which are retained permanently because of their continuing business, evidential or informational value to the Council or communities it serves.
 - 3.1.2 **Data Stewards:** individuals with delegated authority to apply IG rules, including the up-dating of Council data and records to ensure data integrity and quality.
 - 3.1.3 **Data quality:** data is the raw input from which information of value is derived. Data quality is a recognition that the accuracy, coverage, timeliness and completeness of data can significantly impact on the value of its use.
 - 3.1.4 **Information asset:** a body of information defined and managed as a single unit or aggregate so it can be understood, shared, protected and exploited effectively.

- 3.1.5 **Information asset owners:** senior officers involved in managing a business area(s) with responsibility for the information assets within their respective business area(s).
- 3.1.6 **Information asset register:** a governance tool that lists the Council's key information assets.
- 3.1.7 **Information compliance:** ensures compliance with all statutory requirements governing the management of information, including rights of access under freedom of information and data protection legislation.
- 3.1.8 **Information security:** ensures that Council information is not compromised by unauthorised access, modification, disclosure or loss.
- 3.1.9 **Information sharing:** ensures that Council information is shared in a compliant, controlled and transparent manner.
- 3.1.10 **Open data:** data that is accessible (usually via the internet), in a machine readable form, free of restriction on use. It supports transparency and accountability, effective services and economic growth.
- 3.1.11 **Privacy impact assessment:** a risk management tool that reduces the risks of harm to individuals through the misuse of their personal information, and can help with the design of processes for handling personal data. It is used when projects, or changed service activities, or new ICT impact on the privacy of individuals.
- 3.1.12 **Records management:** processes and practices that ensure Council records are systematically controlled and maintained, covering the creation, storage, management, access, and disposal of records, in compliance with best practice, legal obligations and policy requirements. International Standard ISO15489 covers the fundamentals of good records management.
- 3.1.13 **Vital records:** records classified as being essential to the continuation of Council business.

Policy content

- 4.1 Information is a key asset for the Council. It is central to the Council's business processes, decision making, service delivery, and provides evidence and accountability concerning Council actions and performance.
- 4.2 It is crucial that information is managed effectively to maximise its value for the Council and its stakeholders, and to stop it becoming a liability and a risk.
- 4.3 IG provides a framework for bringing together all the legislative and regulatory requirements, standards and best practice in relation to the following areas:
 - 4.3.1 Data quality
 - 4.3.2 Information security
 - 4.3.3 Information compliance
 - 4.3.4 Records management
 - 4.3.5 Information sharing

4.3.6 Open data

- 4.4 It ensures that the Council is creating, managing, using, sharing and disposing of information efficiently, appropriately and lawfully.
- 4.5 The effective management of information places significant demands on the Council. In particular, there is a wide-ranging and complex legal landscape within which the Council has to operate. [Appendix 1A within the Information Governance Strategy](#) details the many acts, regulations, codes of practice and technical standards concerning IG.

Information governance framework

- 4.6 The IG framework provides the Council with a coherent structure to ensure that legal and best practice standards are met and continuously assessed. It consists of the following elements:

Policies

- 4.6.1 Each IG framework area will have a top level policy detailing responsibilities and requirements to ensure compliance with legislative, regulatory and best practice standards. All policies will be available on the Council's Policy Register and reviewed on annual basis by the Information Council and agreed by CMT and Committee.

Procedures

- 4.6.2 There will be documented corporate procedures to support agreed policies which will be developed by the relevant IG area. These will support policy implementation and outline any operational requirements to ensure compliance with legislation and standards. Where appropriate, local procedures will be developed or quality assured by the Information Governance Unit and the relevant business area(s).

Guidance and training

- 4.6.3 Training, education and awareness are essential to ensure compliance with policies and procedures, as well as promoting a culture of corporate responsibility that values information as an asset.
- 4.6.4 Training will be delivered at an appropriate level to all staff using e-learning and other delivery mechanisms by the relevant information governance area. Specific training requirements identified through the information risk management approach will be included in the Information Council's annual work plan. Training will be developed and delivered by the relevant IG area.

Communications

- 4.6.5 Regular communications will be agreed by the Information Council and through the Communications Service to ensure that key information

governance messages are effective, relevant, and targeted at the right audience.

Compliance, monitoring and reporting

- 4.6.6 The Information Governance Unit will facilitate regular and effective monitoring to support the implementation and assessment of IG practices and behaviours across the Council. Managers will also be expected to carry out IG self-assessments on an annual basis.
- 4.6.7 Specific issues and progress will be presented to the Information Council as a matter of routine, and highlighted to the Corporate Management Team and Elected Members.
- 4.6.8 An information governance maturity model will be used to determine progress and overall compliance with IG policies and procedures.

Information asset register

- 4.6.9 The Information Governance Unit will maintain an information asset register for the Council to evaluate and assure compliance with information governance policies and processes, recording and highlighting risk as appropriate. The register will also support wider governance and information activities, including resilience, business intelligence, protective marking and open data initiatives.

Information risk register

- 4.6.10 The Information Governance Unit will maintain an information risk register for the Council (in alignment with its corporate risk approach) that will record information breaches, incidents and any risks highlighted through compliance and self-assessment audits. The register will be reviewed routinely by the Information Council, who will ensure that these risks are actively controlled, assessed and managed.

Information incident reporting

- 4.6.11 An incident reporting process will be maintained by the Information Governance Unit to ensure that all information breaches are reported, investigated, resolved or escalated. Where appropriate, incidents will be recorded in the information risk register.

Privacy impact assessments

- 4.6.12 Privacy impact assessments must be carried out by managers when projects, or changed service activities, or new ICT impact on the privacy of individuals.

Information governance maturity model

- 4.6.13 An information governance maturity model will be used by the Information Council initially to determine progress against this policy and the information

governance strategy. Overall success will be determined by improvement in information governance maturity over a five year period.

Annual report

- 4.6.14 The Senior Information Risk Owner will present an information governance annual report to Committee at the end of each financial year. The report will outline key issues and risks, and will serve as a base line to evaluate future performance and development.

Annual action plan

- 4.6.15 The Information Council will approve and monitor an annual action plan for information governance development and compliance. The plan will outline key tasks, outcomes accountabilities and progress.

Implementation

- 5.1 This policy will be implemented through the Information Council's annual action plan, as described above.

Roles and responsibilities

Corporate Management Team

- 6.1 The Corporate Management Team has overall responsibility for IG. This involves providing high-level support to ensure that each directorate applies relevant information governance policies and controls, and the provision of evidenced statements of information assurance as part of the Council's annual governance statement.
- 6.2 To facilitate the development and implementation of information governance practices, directors will be asked to nominate/ confirm individuals to sit on corporate groups and to carry out specific responsibilities.

Senior Information Risk Owner

- 6.3 The Director of Corporate Governance is the Council's Senior Information Risk Owner (SIRO). The SIRO has delegated authority through the Corporate Management Team with specific responsibility for information risk and mitigation. Specific responsibilities include:
- 6.3.1 Leading and fostering a corporate culture that values, protects and uses information for the success of the organisation and benefit of its citizens.
- 6.3.2 Owning the organisation's overall information risk assessment processes and ensuring they are implemented consistently.
- 6.3.3 Ensuring Elected Members and the Corporate Management Team are adequately briefed on information governance issues and associated risks.

- 6.3.4 Owning the organisation's information incident management framework
- 6.3.5 Providing the final point of resolution for any information risk issues.

Governance Manager (Deputy Senior Information Risk Owner)

- 6.4 Accountability for the on-going strategic development of information governance lies with the Governance Manager within the Legal, Risk and Compliance Division of Corporate Governance. The Governance Manager chairs the Information Council and also deputises for the SIRO as required. The Governance Manager also ensures that the Information Governance Framework is compliant with the Council's overall approach to corporate governance.

Information Council

- 6.5 The Information Council (IC) has delegated responsibility, through the SIRO and the Corporate Management Team, for the development and delivery of effective information governance throughout the Council. In particular, the IC will provide the necessary ownership and advocacy required to support, co-ordinate, promote, monitor and assure information governance compliance.
- 6.6 The IC is made up of service area representatives that are suitably senior and/or with necessary expertise. The work undertaken will be line with IC's terms of reference as detailed at [Appendix 2B](#). The IC reports directly to the SIRO, Corporate Management Team and Committee.

Information Governance Unit

- 6.7 The IGU is responsible for the day to day operation and delivery of information governance within the Council. This includes, but is not limited to:
 - 6.7.1 Collating and responding to requests for information under access legislation.
 - 6.7.2 Co-ordinating, maintaining and developing the information asset register.
 - 6.7.3 Co-ordinating, maintaining and developing the register of information sharing protocols and agreements.
 - 6.7.4 Incident reporting and maintenance of the information risk register, ensuring remedial actions have been undertaken.
 - 6.7.5 Undertaking information governance assessments with service areas.
 - 6.7.6 Providing practical guidance and training for staff, including the development of toolkits.
 - 6.7.7 Leading and supporting compliance issues where appropriate (e.g. Public Services Network or Public Records (Scotland) Act 2011).
 - 6.7.8 Developing local guidance and training for service areas.
 - 6.7.9 Preserving and providing access to the Council's archives.
 - 6.7.10 Implementing and supporting the IC's annual plan.
 - 6.7.11 Liaison with external regulators.

- 6.7.12 The presentation and analysis of key performance data around information governance.
- 6.7.13 Management and operation of the Council's records centre.
- 6.7.14 Providing a focal point for all IG enquiries.
- 6.7.15 Maintenance of register of record retention and disposal rules.
- 6.7.16 Development and maintenance of IG maturity through the IG maturity model.

ICT Solutions

6.8 ICT Solutions is the operational lead on technical IT risks and is responsible for implementing appropriate technical controls, in line with best practice and compliance frameworks (e.g. the Public Services Network). The service works closely with the IGU to ensure that information governance policies, standards, rules and assurance are properly considered as part of the ICT procurement process.

Managers

- 6.9 All managers and supervisors have a responsibility for enabling effective information governance within their respective service areas and teams. This includes but is not limited to:
- 6.9.1 Ensuring that information governance policies, standards and guidance are followed, and that there is on-going compliance on a day to day basis by undertaking annual information governance self-assessments.
 - 6.9.2 Integrating information governance into local processes.
 - 6.9.3 Reporting any suspected breaches of confidentiality or information loss.
 - 6.9.4 Identifying existing or emerging information risks relating to their service area and reporting as appropriate.
 - 6.9.5 Carrying out privacy impact assessments where projects, or changed service activities, or new ICT impact on the privacy of individuals.
 - 6.9.6 Undertaking the role of Information Asset Owners as the use of the Information Asset Register is developed and extended to identify and manage the Council's information assets.

Staff

- 6.10 Managing information effectively and appropriately is the responsibility of all staff. Individuals must ensure that they are familiar with relevant information governance policies, processes and guidance, and compliant with legislative and regulatory requirements.
- 6.11 As part of their role and remit, individuals may also be nominated as Data Stewards (by Information Asset Owners) with operational responsibility for information assets within their respective service areas. This will involve the application of information governance rules, and the up-dating of Council data and records to ensure data integrity and quality.

Related documents

- 7.1 Related documents include:
 - 7.1.1 Information Governance Strategy
 - 7.1.2 Information Governance Policy
 - 7.1.3 Records Management Policy
 - 7.1.4 Freedom of Information Policy
 - 7.1.5 Data Quality Policy
 - 7.1.6 ICT Acceptable Use Policy
 - 7.1.7 Employee Code of Conduct
 - 7.1.8 Open Data Strategy

Equalities impact

- 8.1 There are no equalities issues arising from this policy.

Sustainability impact

- 9.1 There are no sustainability issues arising from this policy.

Risk assessment

- 10.1 The risks of not implementing this policy include:
 - 10.1.1 Distress or harm to individuals or organisations.
 - 10.1.2 Reputational damage to the Council.
 - 10.1.3 Financial loss or monetary penalty imposed.
 - 10.1.4 Detrimental impact on Council business and service delivery.
 - 10.1.5 Non-compliance with legislation and potential litigation.

Review

- 11.1 This policy will be reviewed annually or more frequently if required by significant changes in legislation, regulation or business practice. It will be reviewed by the Information Council and presented to Council committee annually, in line with the Council's Policy Framework.

Appendix 2A; Glossary of Information Governance Terms

A

Archives: are the records which are retained permanently because of their continuing business, evidential or informational value to the Council or communities it serves.

B

Business Systems are databases or other software that create or capture information in relation to Council business. They are primarily used for reference but can be used for workflow or data sharing. Systems that hold information the Council would rely on as evidence should be able to manage their content as records and be **Record Keeping Systems**.

C

Civil Monetary Penalty – the Information Commissioner has powers to impose Civil Monetary Penalties of up to £500 000 where there has been a serious breach of the requirements of the Data Protection Act 1998.

Council Records: are defined as;

- recorded information in any format (including paper, microform, electronic and audio-visual formats),
- which are created, collected, processed, and/or used by City of Edinburgh Council employees, Elected Members when undertaking Council business, predecessor bodies (e.g. Lothian Region Council, Edinburgh District Council, Edinburgh Corporation) or contractors performing a statutory Council function or service
- and which are then kept as evidence of that business.
- **Active Records** are about ongoing Council business and are regularly added to or updated.
- **Closed Records** are about Council business that has concluded and are no longer updated but need to be kept for reasons of reference or evidence.

Criminal Offences under the Data Protection Act 1998 – In Scotland criminal proceedings for an offence under the Data Protection Act 1998 will be brought only by the Procurator Fiscal. In England, Wales and Northern Ireland proceedings can be commenced by the Information Commissioner. The offences under the Data Protection Act 1998 are:

Processing without a valid Notification;
Failure to advise the Information Commissioner of changes to the Notification;
Failure to comply with an Information Notice;
Failure to comply with an Enforcement Notice;
Unlawfully obtaining or disclosing personal data;
Procuring the disclosure of personal data;
Unlawfully selling personal data; and
Enforced subject access.

D

Data controller – a legal person or organisation who determines the purposes for which, and the manner in which, personal information is to be processed. This may be an individual or an organisation. Data controllers can process personal data jointly with other data controllers for specified purposes. The City of Edinburgh Council is a data controller.

Elected Members are data controllers for the purpose of constituency work.

Data: the raw input from which information of value is derived.

Data Council has delegated authority through the IC and supports the implementation of the information governance strategy particularly the Data Quality work stream. The Data Council is chaired by the Information Governance Manager. Key responsibilities include:

- Supporting and improving data quality in the Council;
- Supporting the development of guidance and training around data quality; and
- Providing information and guidance on data management processes.

Data quality: recognition that the accuracy, coverage, timeliness and completeness of data can significantly impact on the value of its use.

Data processor – is a person, other than an employee of the Council, who processes personal data on behalf of the Council. This processing must be evidenced in a written contract. The data processor can only use personal data under the instructions of the Council. The Council retains full responsibility for the actions of the data processor in relation to the personal data.

Data Protection Act 1998 – gives effect in the UK law to the EC Directive 95/46/EC and came into force on 1 March 2000 repealing the Data Protection Act 1984. The Data Protection Act 1998, together with a number of Statutory Instruments, requires data controllers to comply with the legislation governing how personal data is used for statutory and business purposes. Amendments have also been created by other

legislation such as the Freedom of Information Act 2000. It gives rights to individuals in relation to how organisation can use their personal data.

Data subject – a living individual who can be identified from the personal data or from additional information held, or obtained, by the Council. For example, a CCTV image which can identify someone when linked to building access control codes.

Data stewards are nominated by Information Asset Owners with operational responsibility for information assets within their respective service areas. This will involve the application of information governance rules, and the up-dating of Council data and records to help ensure data integrity and quality.

E

EIRs are the Environmental Information (Scotland) Regulations 2004

Enforcement Notice – The Information Commissioner has the power to serve an enforcement notice on a data controller if he determines that a data controller has failed to comply with the requirements of the Data Protection Act 1998. The Notice sets out the actions that the data controller must take to achieve compliance. A data controller can lodge an appeal against the Notice to the Information Tribunal. If the data controller fails to comply with a valid Enforcement Notice this is a criminal offence under the Data Protection Act 1998.

Enforcement Notice – The Scottish Information Commissioner has the power to serve an enforcement notice where she is satisfied that a Scottish public authority has failed to comply with a Provision of Part 1 of FOISA, the EIRs or INSPIRE. Any Enforcement Notice sets out the actions the Scottish Information Commissioner requires the Scottish Public Authority to take to ensure compliance with the legislation and the timescale for completing these. If the Scottish Public Authority fails to comply with this Enforcement Notice, the Scottish Information Commissioner can refer them to the Court of Session for failure to comply, and the Court of Session may deal with the authority as if it had committed a contempt of court.

Exception: This is a regulation under regulations 10 or 11 of the Environmental Information (Scotland) Regulations 2004 which, if applicable to information covered by the request, means that the information does not need to be disclosed.

Exempt information is defined as information which does not have to be disclosed in response to an information request because one of the sections in part 2 of the Freedom of Information (Scotland) Act 2002 or Regulations 10 or 11 of the Environmental Information (Scotland) Regulations apply to it.

Exemption: This is a section in Part 2 of the Freedom of Information (Scotland) Act 2002 which, if applicable to information covered by the request, means that the information does not need to be disclosed.

F

Files are collections of records with a connection that are grouped together to be accessed and managed as a single item.

File Plan is a governance tool that classifies Council records in terms of Council function and activity; it acts as the baseline to connect this policy, and its related guidance and procedures, to the business processes that create, manage, use and dispose of Council records.

FOISA is the Freedom of Information (Scotland) Act 2002

Format is the medium in which records are created from; most electronic formats are capable of being edited and changed continually (e.g. MS Word), 'fixed formats' do not allow this (e.g. PDF).

G

General entitlement means the right of any person, anywhere in the world to make a request for any recorded information held by the Council under the Freedom of Information (Scotland) Act 2002 or the Environmental Information (Scotland) Regulations 2004.

H

I

Information means any information recorded in any form.

Information asset: a body of information defined and managed as a single unit or aggregate so it can be understood, shared, protected and exploited effectively.

Information asset owners: senior officers involved in managing a business area(s) with responsibility for the information assets within their respective business area(s).

Information asset register: a governance tool that lists the Council's key information assets.

Information Commissioner – is responsible for the regulation of the Data Protection Act 1998 throughout the UK. The Information Commissioner is appointed by the Queen and is independent of the UK Government.

Information compliance: ensures compliance with all statutory requirements governing the management of information, including rights of access under freedom of information and data protection legislation.

Information Council (IC) has delegated responsibility, through the SIRO and the Corporate Management Team, for the development and delivery of effective

information governance throughout the Council. In particular, the IC will provide the necessary ownership and advocacy required to support, co-ordinate, promote, monitor and assure information governance compliance.

Information Governance Framework is a suite of policies, procedures, guidance and standards covering the following areas; Data Quality, Information Compliance, Information Sharing, Information Security and Records Management.

Information Notice – an Information Notice can be issued by the Information Commissioner which requires a data controller to provide his office with information that he requires to carry out his functions. Failure to comply with an Information Notice is a criminal offence.

Information security: ensures that Council information is not compromised by unauthorised access, modification, disclosure or loss.

Information sharing: ensures that Council information is shared in a compliant, controlled and transparent manner.

INSPIRE means the INSPIRE (Scotland) Regulations 2009

J

K

L

Limitation: This is a regulation under regulation 10 of the INSPIRE (Scotland) Regulations 2009 which, if applicable to the information covered by the request, means that the information does not need to be disclosed.

M

Meta data means information describing spatial data sets and spatial data services and making it possible to discover, inventory and use them.

N

Notification - the Council is required to Notify the Information Commissioner about the categories of personal information it processes and the purposes the personal information is being processed for. Failure to Notify is a **criminal offence**. The Council must inform the Information Commissioner of any changes to the processing of personal data and renew the Notification annually. Failure to do so is also a **criminal offence**. The Information Commissioner maintains, and publishes, a Register of Data Controllers.

Elected Members are required to lodge, and maintain, a separate Notification to cover constituency work. Failure to do so is a **criminal offence**.

O

P

Personal data – is information about a living individual who can be identified from that information or from additional information held, or obtained, by the Council. Examples of personal data are contained in paper files, electronic records and visual and audio recordings.

Practice Recommendation – The Scottish Information Commissioner may issue a Practice Recommendation to a Scottish public authority where she finds that the authority has not complied with the Codes of Practice issued under sections 60 and 61 of FOISA. Any Practice Recommendation issued by the Scottish Information Commissioner will set out where she considers the Scottish Public Authority not to have complied with the Code(s) of Practice and the action(s) they should take to conform.

Processing – is all actions relating to personal data. Gathering, recording, analysing, amending, using, sharing, disclosing, storing and destroying personal data are all covered by this definition.

Public interest test means the consideration that has been given to whether the interests of the public lie in disclosure of the information covered by the request, and that the public interest in disclosing information is not outweighed by that in maintaining the exemption. (FOISA)

That, in all the circumstances, the public interest in making the information available is outweighed by that in maintaining the exception. (EIRs)

That, the public interest in limiting or placing conditions on public access outweighs the public interest in providing full access, in all the circumstances of the case. (INSPIRE)

Publication scheme is a guide to the information which the Council routinely makes publicly available.

Public Records (Scotland) Act 2011: requires public authorities to detail their records management policies, procedures and responsibilities in a Records Management Plan, which is subject to review by the Keeper of the Records of Scotland. It also requires public authorities to monitor the management of records produced by their contractors undertaking any statutory functions performed on their behalf.

Q

R

Records see Council Records

Record Group

Records that have the same business purpose can be described as belonging to a record group or series. They do not need to be the same in focus (e.g. different clients, buildings or projects), format (e.g. paper or electronic) or style (e.g. forms, correspondence, reports etc.). Records belonging to the same group have the same retention rule. Record groups can be either Common or Service Specific;

- **Common Record Groups** are created and used by more than one service area of the Council (e.g. Financial Transactions)
- **Service Specific Record Groups** are created by a single service area of the Council (e.g. Building Warrants)

Record keeping systems

Council business systems that hold electronic records must be configured to ensure they create, maintain and dispose of those records in compliance with statutory requirements and professional standards. The Council's Information Management Group is responsible for issuing and maintaining **guidance** on electronic record keeping systems to support managers in acquiring and using appropriate systems.

Records management: are the processes and practices that ensure Council records are systematically controlled and maintained, covering the creation, storage, management, access, and disposal of records, in compliance with best practice, legal obligations and policy requirements. International Standard **ISO15489** covers the fundamentals of good records management.

Records Management Manual – a document that details how records are created, maintained and disposed of within a team, service area, project or working group.

Records Series see Record Group

Requirement for review means a written request to the Council expressing dissatisfaction with its response to an information request, asking it to review its actions and decision(s) in relation to the request.

Retention Rules identify when closed records or files can be disposed of and what should happen to them at that point. They can be broken down into four parts;

- Activity / Record Description – *provides the context on what is covered by the retention rule*
- Trigger – *indicates the moment that the retention period starts applying; usually around the event or date that “closes” a record*
- Retention Period – *how long you hold onto a record beyond the trigger point*
- Disposal Action – *the action required once a record has reached the end of its retention period*

Retention Schedule is a collection of authorised retention rules, usually grouped together by function and activity.

S

Scottish Information Commissioner – is responsible for the promotion and enforcement of the Freedom of Information (Scotland) Act 2002, the Environmental Information (Scotland) Regulations 2004 and the INSPIRE (Scotland) Regulations 2009 and any associated Codes of Practice.

Sensitive Personal Data – requires a higher level of consideration. The following categories are defined as ‘sensitive personal data’ for the purposes of the Data Protection Act 1998 –

Racial or ethnic origin of the data subject;

Political Opinions;

Religious or similar beliefs;

Trade Union membership;

Physical or mental health or condition;

Sexual life; and

Criminal offences or alleged criminal activity (and any criminal proceedings).

Spatial Data means any data with a direct or indirect reference to a specific location or geographical area.

Spatial Data Set means an identifiable collection of spatial data which –

(a) Are in an electronic format

(b) Relate to one or more of the themes listed in Annex I, II or III to the Directive, and

(c) Relate to –

(i) The United Kingdom

(ii) Gibraltar

(iii) The territorial sea of the United Kingdom

(iv) The area of the continental shelf for the time being designated by an Order in Council under section 17(1) of the Continental Shelf Act 1964, or

(v) An area, outside the territorial sea of the United Kingdom, for the time being designated by an Order in Council under section 84(4) of the Energy Act 2004.

Spatial Data Services means a service which consists of operations which may be performed, by invoking a computer application –

(a) On the spatial data contained in a spatial data set, or

(b) On the metadata related to a spatial data set.

Subject Access Request – the right given by the Data Protection Act 1998, to an individual to ask the Council for a copy of the personal data being processed by the Council. However, there are exemptions that may be applied in certain circumstances and copies of all the personal data will be provided in response to every request. The information must be supplied in an intelligible form and in a permanent form unless this would involve disproportionate effort or if the individual agrees otherwise. The Council may have to consider the Disability Discrimination Act requirements when providing personal data to an individual who may require the information to be provided in a certain format to take a special need into account.

T

U

V

Vital records: are records classified as being essential to the continuation of Council business.

W

Working day means any day other than a Saturday, Sunday, Christmas Day, or a Day which, under the Banking and Financial Dealings Act 1971 is a bank holiday in Scotland.

X

Y

Z

Appendix 2B; Information Council Responsibilities

1. Provide strategic leadership for information governance and information risk management throughout the Council.
2. Support and monitor the development of the Information Governance Framework and its implementation, including all accompanying policies, guidance and tools.
3. Agree, support and monitor the annual information governance plan to drive change, including plan revision and realignment to mitigate risk.
4. Take ownership of the information risk management approach, including monitoring compliance with the Information Governance Framework, reporting and escalating information risks as appropriate, taking corrective actions where necessary, and maintaining the corporate risk register.
5. Receive and consider reports into breaches of confidentiality and security and, where appropriate, undertake or recommend remedial action.
6. Develop solutions and implementation programmes (including training and raising awareness) to ensure that the Council complies with developing information governance requirements.
7. Ensure that each Directorate and service fulfil their responsibilities and apply relevant information governance policies and controls.
8. Support managers with the implementation of information governance standards and policies, the management of information risks, and in promoting awareness throughout their service areas.
9. Support audit and assessment arrangements for information governance (internal and external).
10. Undertake an annual maturity assessment to measure progress and improvement.
11. Ensure the Council Management Team and Elected Members are appropriately and regularly briefed on information governance and risk issues.
12. Ensure that Council's approach to information governance and information risk is effective in terms of resource, commitment and execution, and that it is communicated to all service areas and staff.
13. Create, direct and support subsidiary groups (e.g. Data Council) in developing, maintaining and complying with the Information Governance Framework.
14. Liaise with other working groups and programme boards to ensure compliance with the Council's Information Governance Framework.
15. Provide a focal point for the resolution and/or discussion of information governance and risk issues.

Appendix 3 - Data Protection Policy

Policy statement

- 1.1. This policy sets out and formalises the City of Edinburgh Council's (the Council) approach for ensuring that personal information is properly processed, managed and protected in accordance with the requirements of the Data Protection Act 1998. All personal data held, maintained and used by the Council in all locations and in all media (paper and electronic).
- 1.2. It outlines the Council's commitment to the principles enshrined within the Act, and the need to balance the rights of individuals with the functions and operational requirements of the Council.

Scope

- 2.1. This policy applies to:
 - 2.1.1 All personal data held, maintained and used by the Council in all locations and in all media (paper and electronic).
 - 2.1.2 Council staff, including temporary staff, contractors, consultants and volunteers that access and use Council information; and
 - 2.1.3 All third parties that manage and process personal data on the Council's behalf when carrying out a statutory Council function or service.

Definitions

- 3.1 The definitions below cover specific terms and descriptions used in this policy.
- 3.2 **Criminal Offences under the Data Protection Act 1998** – In Scotland criminal proceedings for an offence under the Data Protection Act 1998 will be brought only by the Procurator Fiscal. In England, Wales and Northern Ireland proceedings can be commenced by the Information Commissioner. The offences under the Data Protection Act 1998 are:
 - 3.2.1 Processing without a valid Notification;
 - 3.2.2 Failure to advise the Information Commissioner of changes to the Notification;
 - 3.2.3 Failure to comply with an Information Notice;
 - 3.2.4 Failure to comply with an Enforcement Notice;
 - 3.2.5 Unlawfully obtaining or disclosing personal data;
 - 3.2.6 Procuring the disclosure of personal data; and
 - 3.2.7 Unlawfully selling personal data;

- 3.2.8 Enforced subject access.
- 3.3 **Data controller** – a legal person or organisation who determines the purposes for which, and the manner in which, personal information is to be processed. This may be an individual or an organisation. Data controllers can process personal data jointly with other data controllers for specified purposes. The City of Edinburgh Council is a data controller. **Elected Members** are data controllers for the purpose of constituency work.
- 3.4 **Data processor** – is a person, other than an employee of the Council, who processes personal data on behalf of the Council. This processing must be evidenced in a written contract. The data processor can only use personal data under the instructions of the Council. The Council retains full responsibility for the actions of the data processor in relation to the personal data.
- 3.5 **Data Protection Act 1998** – gives effect in the UK law to the EC Directive 95/46/EC and came into force on 1 March 2000 repealing the Data Protection Act 1984. The Data Protection Act 1998, together with a number of Statutory Instruments, requires data controllers to comply with the legislation governing how personal data is used for statutory and business purposes. Amendments have also been created by other legislation such as the Freedom of Information Act 2000. It gives rights to individuals in relation to how organisation can use their personal data.
- 3.6 **Data subject** – a living individual who can be identified from the personal data or from additional information held, or obtained, by the Council. For example, a CCTV image which can identify someone when linked to building access control codes.
- 3.7 **Enforcement Notice** – The Information Commissioner has the power to serve an enforcement notice on a data controller if he determines that a data controller has failed to comply with the requirements of the Data Protection Act 1998. The Notice sets out the actions that the data controller must take to achieve compliance. A data controller can lodge an appeal against the Notice to the Information Tribunal. If the data controller fails to comply with a valid Enforcement Notice this is a criminal offence under the Data Protection Act 1998.
- 3.8 **Information Commissioner** – is responsible for the regulation of the Data Protection Act 1998 throughout the UK. The Information Commissioner is appointed by the Queen and is independent of the UK Government.
- 3.9 **Information Notice** – an Information Notice can be issued by the Information Commissioner which requires a data controller to provide his office with information that he requires to carry out his functions. Failure to comply with an Information Notice is a criminal offence.
- 3.10 **Information security** – ensures that Council information is not compromised by unauthorised access, modification, disclosure or loss.
- 3.11 **Information sharing** – ensures that the Council information is shared in a compliant, controlled and transparent manner.

- 3.12 **Mandate** - provides authorisation for the release of personal data in line with the provisions of the Data Protection Act 1998.
- 3.13 **Notification** - the Council is required to notify the Information Commissioner about the categories of personal information it processes and the purposes the personal information is being processed for. Failure to Notify is a **criminal offence**. The Council must inform the Information Commissioner of any changes to the processing of personal data and renew the Notification annually. Failure to do so is also a **criminal offence**. The Information Commissioner maintains, and publishes, a Register of Data Controllers.
- 3.14 **Elected Members** are required to lodge, and maintain, a separate Notification to cover constituency work. Failure to do so is a **criminal offence**.
- 3.15 **Personal data** – is information about a living individual who can be identified from that information or from additional information held, or obtained, by the Council. Examples of personal data are contained in paper files, electronic records and visual and audio recordings.
- 3.16 **Privacy Impact Assessment** – a risk management tool that reduces the risks of harm to individuals through the misuse of their personal information, and can help with the design of processes for handling personal data. It is used when projects, or changes to service activities, or new ICT impact on the privacy of individuals.
- 3.17 **Processing** – is all actions relating to personal data. Gathering, recording, analysing, amending, using, sharing, disclosing, storing and destroying personal data are all covered by this definition.
- 3.18 **Sensitive Personal Data** – requires a higher level of consideration. The following categories are defined as ‘sensitive personal data’ for the purposes of the Data Protection Act 1998 –
- 3.18.1 Racial or ethnic origin of the data subject;
 - 3.18.2 Political Opinions;
 - 3.18.3 Religious or similar beliefs;
 - 3.18.4 Trade Union membership;
 - 3.18.5 Physical or mental health or condition;
 - 3.18.6 Sexual life; and
 - 3.18.7 Criminal offences or alleged criminal activity (and any criminal proceedings).
- 3.19 **Subject Access Request** – the right given by the Data Protection Act 1998, to an individual to ask the Council for a copy of the personal data being processed by the Council. However, there are exemptions that may be applied in certain circumstances and copies of all the personal data will be provided in response to every request. The information must be supplied in an intelligible form and in a permanent form unless this would involve disproportionate effort or if the individual agrees otherwise. The Council may have to consider the requirements under the Equalities Act 2010 when providing personal data to an individual who may require the information to be provided in a certain format to take a special need into account.

- 3.20 The **European Economic Area** provides for the free movement of goods and persons through member states of the European Union and three of the member states of the European Free Trade Association (Iceland, Liechtenstein and Norway)

Policy content

Introduction

- 4.1 The Council needs to collect and use information about its customers to facilitate the effective delivery of services. The Data Protection Act 1998 ensures that this information is gathered, used, stored, shared, protected, retained and destroyed in a way which is fair and lawful.

Data Protection Principles

- 4.2 The basis of the Act is set out in the eight data protection principles which the Council must comply with in relation to personal information.
- 4.3 **Data Protection Principle 1** - Personal data shall be processed fairly and lawfully
- 4.3.1 The Council regularly collects personal data from individuals who receive services or have a relationship with the Council (e.g. suppliers, employees). In accordance with the conditions set out in the Data Protection Act 1998, the Council will ensure that there is a fair and lawful basis for collecting and processing personal data.
- 4.4 **Data Protection Principle 2** – Personal data shall be obtained for one or more lawful purposes, and not processed in a manner incompatible with that purpose.
- 4.4.1 The Council will explain why it is collecting personal data and how it intends to use that data. A regular review of personal information gathering forms and methods will be undertaken by the Information Governance Unit to ensure legal compliance, taking into account the *Code of Practice on Privacy Notices* produced by the Information Commissioner.
- 4.4.2 To provide customers with a better service and to fulfil the Council's statutory functions, personal data collected across Council services may be used in different ways, if its use is deemed appropriate and fair. Individuals will be advised if their personal data is to be used in a new way.
- 4.4.3 Privacy impact assessments must be carried out by service areas when:
- 4.4.3.1 Council projects or programmes are undertaken;
- 4.4.3.2 Service activities commence, end or are significantly adjusted; and/or
- 4.4.3.3 New ICT arrangements are put in place which use and process personal data with a potential impact on the privacy of individuals.

- 4.5 **Data Protection Principle 3** – Personal data shall be adequate, relevant and not excessive in relation to the purpose or purposes for which they are processed.
- 4.5.1 The Council will only obtain, use and retain personal information that it actually needs to fulfil its business and operational requirements.
- 4.6 **Data Protection Principle 4** – Personal data shall be accurate and, where necessary, kept up to date.
- 4.6.1 The Council must ensure that personal data is accurate, relevant and current to facilitate the effective delivery of services. Individuals have a right to compensation if damage has been caused to them by the Council taking decisions about them based on out of date and/or inaccurate information.
- 4.7 **Data Protection Principle 5** – Personal data processed for any other purpose or purposes shall not be kept for any longer than is necessary for that purpose or purposes.
- 4.7.1 Personal data must be retained and disposed off in accordance with the Council's Record Retention and Disposal Schedules. Retention rules apply to both hardcopy and electronic formats.
- 4.7.2 All personal data must be disposed off securely and appropriately.
- 4.8 **Data Protection Principle 6** - Personal data shall be processed in accordance with the rights of data subjects (including a right of Subject Access).
- 4.8.1 Requests for personal information (subject access requests):
- 4.8.1.1 Section 7 of the Data Protection Act 1998 gives individuals the right to ask what personal information is held about them, and to obtain a copy of that information, subject to limited exemptions.
- 4.8.1.2 Subject access requests are logged and processed by the Information Governance Unit and must be responded to within 40 calendar days. The Unit will ask individuals to provide proof of identity to verify requests, or ask for authorisation to disclose if a request is being made on behalf of an individual.
- 4.8.1.3 If an individual believes the Council has not complied with the Data Protection Act 1998, they can refer their concerns to the Information Commissioner's Office and ask them to undertake an assessment of how the Council has dealt with their request.
- 4.8.1.4 The Data Protection Act 1998 gives data controllers the right to charge a fee of £10.00 (the fee can be higher for different types of records, such as school records). The Council does not routinely charge for subject access requests, but reserves the right to do so.
- 4.8.2 Prevention of processing causing damage or distress

- 4.8.2.1 Individuals can ask the Council, in writing, to stop using their personal data if they consider that the processing of their data is causing them substantial unwarranted damage or distress. The individual is not entitled to serve such a notice if any of the following conditions for using their personal information apply:
- 4.8.2.2 the individual has given a valid consent to the use of their personal information;
- 4.8.2.3 the use of the personal information is required for the purpose of a contract with the individual;
- 4.8.2.4 the use of the personal information is necessary for any legal obligation placed on the Council;
- 4.8.2.5 the use of the personal information is necessary to protect the vital interest of the individual.
- 4.8.2.6 The Council must respond within 21 calendar days if a notice to cease using personal information is received.
- 4.8.3 Right to rectification, blocking, erasure and destruction of personal data
- 4.8.3.1 An individual has the right to have any inaccurate personal data corrected, blocked, erased or destroyed in circumstances where the personal data is inaccurate (as a matter of fact).
- 4.8.3.2 If individuals disagree with a professional opinion which has been recorded about them, a note will be added to their record.
- 4.8.4 Rights in relation to automated decision making
- 4.8.4.1 An individual is entitled to ask the Council, in writing, that any decision which has a significant effect on them is not based solely on automated decision making methods.
- 4.8.5 Rights to compensation
An individual who suffers damage or distress as the result of contravention of the Act by the Council may seek compensation by application to the Court.
- 4.9 **Data Protection Principle 7** – Appropriate technical and organisational measures shall be taken against unauthorised or unlawful processing of personal data and against accidental loss or destruction, or damage to, personal data.
- 4.9.1 Information security
- 4.9.1.1 Personal data must be kept secure at all times. The Council's Guidance Note on Protecting Personal Data and the ICT Acceptable Use Policy provide practical advice that must be followed to protect personal data in the possession of the Council.
- 4.9.2 Data breaches
- 4.9.2.1 Data breaches can occur through the theft or accidental loss of personal data (for example, laptops, tablets, portable devices, files containing personal data). It can also occur through the unauthorised use or

accidental disclosure of personal data by employees, and deliberate attacks on Council systems.

4.9.2.2 All breaches involving personal and sensitive personal data must be reported to the Information Governance Unit, in line with the Council's Data Breach Procedure. This will allow the Council to take all the necessary steps to recover the data and limit any potential damage caused by the breach.

4.10 **Data Protection Principle 8** – Personal information must not be transferred to countries outside the European Economic Area unless that country has adequate protection for the rights and freedom of individuals in respect of the use of personal information

4.10.1 While the Council does not routinely transfer personal information outside the United Kingdom and the European Economic Area, there may be occasions when this required. The Information Governance Unit will advise and ensure that there are appropriate safeguards in place to satisfy the 8th principle.

Disclosure

4.11. Disclosure of personal information

4.11.1 There are many instances where personal data can be disclosed with (and without) the consent of the individual. For example, information may be shared with other agencies through partnership arrangements – a process governed by data sharing agreements. Individuals may also authorise disclosure through a mandate. On such occasions, only the personal data that is necessary should be disclosed. When considering the disclosure of information attention must be given to protective marking scheme categories.

4.12 Disclosure of personal data to Elected Members

4.12.1 Elected members may request personal data in the course of their work, for example as a committee member, or acting on behalf of a constituent. Elected Members will be given access to the personal data they need to carry out their duties, in line with the Member/Officer Protocol.

4.13 Disclosure of personal data relating to crime and taxation

4.13.1 Section 29 of the Data Protection Act 1998 allows the Council to consider disclosing personal data for the purpose of prevention or detection of crime; the apprehension or prosecution of offenders; or the assessment or collection of taxes or duties. Each request is considered on a case by case basis and must be forwarded to the Information Governance Unit for processing and response.

4.14 Disclosure of data required by law

4.14.1 Section 35 of the Data Protection Act 1998 allows the Council to consider releasing information in relation to legal proceedings. Each request is

considered on a case by case basis and must be forwarded to Information Compliance for processing and response.

4.15 Business as usual requests

- 4.15.1 If an individual requests personal data that has already been sent or disclosed to that individual (for example, a letter that has been sent previously), then service areas should treat such requests as business as usual requests and send replacement copies, subject to confirming proof of identity.

4.16 Unauthorised disclosure

- 4.16.1 Employees (and others covered by this policy) must never disclose personal data obtained in the course of their work with the Council, or access personal data without appropriate permissions. It is a criminal offence under section 55 of the Data Protection Act 1998 to knowingly obtain or disclose personal data without the consent of the data controller (the City of Edinburgh Council).

Data sharing

- 4.17 The Council works with other public agencies to provide services. The sharing of personal data between the Council and other public authorities is subject to formal data sharing protocols which set out overarching common rules adopted by the Council and other public agencies with whom it wishes to share data. Details of each data sharing process are documented in data sharing agreements. A central register of all protocols and agreements will be maintained by the Information Governance Unit to ensure that transfer and sharing arrangements meet the requirements of the Data Protection Act 1998, and the Information Commissioner's Code of Practice on Data Sharing. All new data sharing protocols and agreements must be assured by the Information Governance Unit in the first instance.

Data processing

- 4.18 Contractors and consultants will carry out work and process personal data on the Council's behalf to help deliver services. In such cases, the Council is considered to be the 'data controller' responsible for that personal data, and the contractor or consultant as the 'data processor' who processes that data on behalf of the Council. Such arrangements must be governed by written agreements or contracts to ensure compliance with this policy and the data protection principles, including on-going monitoring. Legal Services must be consulted before engaging contractors or consultants who process personal data.

Notification

- 4.19 As a Data Controller, the Council has to notify the Information Commissioner about the types of personal data it collects and processes. The Council's notification is included on the Data Protection Register which is available on the Commissioner's website. The Information Governance Unit is responsible for compiling and renewing the Council's notification each year. It is a criminal offence not to notify the Information Commissioner, if there is a requirement to do so. Failure to maintain an up to date notification, if required to do so, is a criminal offence.

Information Asset Register

- 4.20 An Information Asset Register will be maintained by the Information Governance Unit. The register identifies personal data and sensitive personal data held by the Council, and helps to evaluate and assure compliance with the Council's information governance policies and processes, recording and highlighting risk as appropriate.

Training

- 4.21 All employees, contractors, consultants and volunteers need to be aware of their obligations under the Data Protection Act 1998. A variety of training methods will be employed to ensure appropriate levels of awareness, understanding and knowledge.

Implementation

- 5.1 The Information Council will approve and monitor an annual action plan for information governance development and compliance, including data protection. The plan will outline key tasks, outcomes, accountabilities and progress.

Roles and responsibilities

- 6.1 The Information Governance Policy provides a detailed explanation concerning overall roles and responsibilities around information governance. This section provides a summary of those responsibilities, but also outlines specific responsibilities in relation to compliance with the Data Protection Act 1998.

Elected Members

- 6.2 Elected members are covered by the Council's notification when carrying out official duties for the Council but they are required, by law, to hold a separate notification for constituency work. Elected member notification is administered by the Information Governance Unit.

Corporate Management Team

- 6.3 The Corporate Management Team has overall responsibility for information governance. This involves providing high-level support to ensure that each directorate applies relevant information governance policies and controls, including compliance with the requirements of the Data Protection Act 1998. Responsibility also extends to personal data that is processed by third parties within their respective areas of responsibility.

Senior Information Risk Owner

- 6.4 The Director of Corporate Governance is the Council's Senior Information Risk Owner (SIRO). The SIRO has delegated authority through the Corporate Management Team with specific responsibility for information risk and mitigation, ensuring that any information threats and breaches are identified, assessed and effectively managed.

Governance Manager

- 6.5 The Governance Manager is the Deputy Senior Information Risk Owner and deputises for the SIRO as required.

Information Council

- 6.6 The Information Council (IC) has delegated responsibility, through the SIRO and the Corporate Management Team, for the development and delivery of effective information governance throughout the Council. In particular, the IC will provide the necessary ownership and advocacy required to support, co-ordinate, promote, monitor and assure compliance with the Data Protection Act 1998. The IC is chaired by the Deputy SIRO.

Information Governance Unit

- 6.7 The Information Governance Unit is part of the Governance Service with responsibility for the day to day operation and delivery of information governance within the Council. In relation to data protection it will:
- 6.7.1 Act as the first point of contact for all data protection issues affecting the Council;
 - 6.7.2 Provide guidance and advice on data protection issues for all Council directorates;
 - 6.7.3 Renew and amend the Council's data protection notification to the ICO, as advised by managers;
 - 6.7.4 Co-ordinate, process and respond to all subject access requests;

- 6.7.5 Oversee and quality assure all data sharing protocols and agreements between the Council and other partner agencies;
- 6.7.6 Record and maintain the Council's information risk register, including risks relating to data protection and associated information governance activities;
- 6.7.7 Create, maintain and renew training modules and toolkits as appropriate;
- 6.7.8 Provide data protection training and awareness raising (as requested);
- 6.7.9 Maintain and report on key performance indicators for information governance;
- 6.7.10 Lead and advise on compliance requirements where the processing of personal information is complex (e.g. multi-agency working);
- 6.7.11 Co-ordinate the Council's information breach procedures; and
- 6.7.12 Carry out information governance assessments.

Managers

- 6.8 All managers must:
 - 6.8.1 Ensure that this policy and any associated procedures governing the use of personal information (corporate and local) are in place, understood and followed by all staff within their business areas;
 - 6.8.2 Ensure that their staff have received data protection training (appropriate to their role), and maintain records as to when initial and refresher training has taken place;
 - 6.8.3 Review and revise procedures if processes governing the use of personal information are subject to change within their business areas;
 - 6.8.4 Consult the Information Governance Unit when there is a proposed change to the use of personal information, or when new projects are being considered;
 - 6.8.5 Undertake Privacy Impact Assessments in respect of new projects or new processing of personal information;
 - 6.8.6 Consult the Information Governance Unit before signing up to, or revising, any information sharing protocol or agreement;
 - 6.8.7 Report any suspected breaches of confidentiality or information loss to the Information Governance Unit and follow the breach reporting procedure;
 - 6.8.8 Identify any existing or emerging information risks relating to personal information and report to the Information Governance Unit and, if required, record on local, divisional and directorate risk registers;
 - 6.8.9 Ensure that personal data required to answer a subject access request is provided timeously to the Information Governance Unit;

- 6.8.10 Ensure that there are appropriate procedures and measures in place protect personal data, particularly when that information (hardcopy and electronic) is removed from Council premises;
- 6.8.11 Undertake annual information governance self-assessments to ensure on-going compliance with this policy and associated information governance activities;
- 6.8.12 Provide a statement of assurance to evidence information governance compliance; and
- 6.8.13 Inform the Information Governance Unit (when requested) of activities containing personal data (paper or electronic) to facilitate the Council's notification process with the Information Commissioner.

Employees

- 6.9 All employees have a responsibility for data protection and must:
 - 6.9.1 Read, understand and follow this policy and any associated procedures that relate to the use and handling of personal information in the course of their work;
 - 6.9.2 Undertake data protection training (including annual refresher training) and ensure they have a clear understanding of their responsibilities in using and handling personal information;
 - 6.9.3 Identify and report any risks to personal information to their line manager
 - 6.9.4 Identify and report suspected breaches of confidentiality or compromised personal data to their line manager;
 - 6.9.5 Identify and forward any subject access requests to the Information Governance Unit to ensure that requests can be processed in accordance with the statutory timescales; and
 - 6.9.6 Assist customers in understanding their information rights and the Council's responsibilities in relation to data protection.

Related documents

- 7.1 Related documents include:
 - 7.1.1 Information Governance Strategy
 - 7.1.2 Information Governance Policy
 - 7.1.3 Records Management Policy
 - 7.1.4 Freedom of Information Policy
 - 7.1.5 Data Quality Policy

- 7.1.6 ICT Acceptable Use Policy
- 7.1.7 Employee Code of Conduct
- 7.1.8 Open Data Strategy

Equalities impact

- 8.1 There is no adverse impact on any group in terms of race, religion, disability, ethnic origin, sexuality or age in relation to this policy.

The Act includes clauses relating to information about young children and secondary legislation provides legislative grounds to be followed when dealing with personal information about people who have a limited capacity as to the understanding of their rights under the Act. Secondary legislation also provides clauses to ensure compliance with specific categories of information such as adoption and education records.

Sustainability impact

- 9.1 There are no sustainability issues arising from this policy.

Risk assessment

- 10.1 Failure to comply with any requirement of the Act could result in enforcement action by the ICO. The ICO has powers to impose a Civil Monetary Penalty which can result in a fine of up to £500 000 for each breach. This amount could rise considerably subject to the adoption of the Data Protection Regulation under consideration by the European Parliament.
- 10.2 Individuals may take action against the Council through the Court for any misuse of their personal information. Depending on which Court takes the action fines could be unlimited.
- 10.3 Failure to renew or amend the Council's Data Protection Notification as required by the Act will result in a criminal offence.
- 10.4 Failure to respond to any of the time critical response requirements in relation to information rights for individuals will result in a breach of the Act.
- 10.5 Mishandling of personal information will have a serious reputational impact to the Council.

- 10.6 Mishandling of personal information may have serious implications to one, or more, individuals.
- 10.7 Personal information that is inaccurate or out of date may result in a serious negative impact on one or more individuals.

Review

- 11.1 This policy will be reviewed annually or more quickly if required by significant changes in legislation, regulation or business practice. It will be reviewed by the Information Council and presented to Council committee annually, in line with the Council's Policy Framework.

Appendix 4 - Data Quality Policy

Policy statement

- 1.1 The City of Edinburgh Council (the Council) needs reliable, relevant, accurate and timely data to help deliver services and to account for its performance. Data quality is a key element of the Council's Information Governance Strategy and this policy sets out the Council's commitment and approach to improving its creation, management and use.

Scope

- 2.1 This policy relates to:
 - 2.1.1 All Council data and information collection activities.
 - 2.1.2 Council staff, including temporary staff, contactors and consultants that create, use and manage data.
 - 2.1.3 All third parties that create, process and use data on the Council's behalf when carrying out a statutory function or service.

Definitions

- 3.1 The definitions below cover specific terms and descriptions used in this policy.
- 3.2 **Data:** the raw input from which information of value is derived.
- 3.3 **Data quality:** recognition that the accuracy, coverage, timeliness and completeness of data can significantly impact on the value of its use.
- 3.4 **Data stewards** are nominated by Information Asset Owners with operational responsibility for information assets within their respective service areas. This will involve the application of information governance rules, and the up-dating of Council data and records to help ensure data integrity and quality.
- 3.5 **Information asset:** a body of information defined and managed as a single unit so it can be understood, shared, protected and exploited effectively.
- 3.6 **Information asset owners:** senior officers involved in managing a business area(s) with responsibility for the information assets within their respective business area(s).

- 3.7 **Open data:** data that is accessible (usually via the internet), in a machine readable form, free of restriction on use. It supports transparency and accountability, effective services and economic growth.

Policy content

- 4.1 Data quality is concerned with producing information that is 'fit for purpose' and available when required. It supports service provision and the Council's business operations by ensuring that any data collected, used, recorded and shared is accurate, complete and reliable.
- 4.2 It also ensures that Council decisions are based on reliable management and performance information, and provides confidence when benchmarking or producing reports and statistical analysis for internal and external audiences.
- 4.3 The production and availability of high quality data also supports the Council's objectives to be open and transparent, and aligns closely with the Council's open data strategy.
- 4.4 Quality data also helps the Council comply with its obligations under the Data Protection Act 1998.
- 4.5 To assure the quality of data, the Council will adopt the following principles which will be supported procedures, guidance and training.

Data collection

- 4.5.1 **Accuracy:** Data must be accurate with clear procedural guidance for collecting, using and amending data.
- 4.5.2 **Timeliness:** Data should be collected as quickly as possible after the event or activity, and must be available quickly enough to support information/business needs and management decisions
- 4.5.3 **Relevance:** Data must be relevant to the purposes for which it is used, and must be reviewed on a regular basis to reflect changing needs, including changed service or legislative requirements.

Data management

- 4.5.4 **Reliability:** Data collection processes must be clearly defined and followed to ensure on-going stability and consistency over time. In particular, trend data must reflect real change rather than variations in data collections methods or approaches.
- 4.5.4 **Verification:** Data must be verified on a regular basis to ensure that there are no gaps, and that systems do not contain redundant or duplicate records. Verification approaches include:

- 4.5.4.1 Data cleansing to remove duplicate records or complete missing information
- 4.5.4.2 Signing-off processes to verify that data has been checked
- 4.5.4.3 Regular query reports to check system integrity
- 4.5.4.4 Regular checks and sampling to quality assure data accuracy

Data presentation

- 4.6 **Validity:** Data needs to be presented in line with relevant requirements, rules and definitions to ensure clarity, consistency and comparability, in particular performance and open data.

Implementation

- 5.1 The Information Council will approve and monitor an annual action plan for information governance development and compliance, including data quality. The plan will detail key tasks, outcomes, accountabilities and progress to ensure high standards of data quality, based on the principles listed above.

Roles and responsibilities

- 6.1 The Information Governance Policy provides a detailed explanation concerning overall roles and responsibilities around information governance. This section provides a summary of those responsibilities, but also outlines specific responsibilities in relation to using, managing and improving the quality of the Council's data.

Corporate Management Team

- 6.2 The Corporate Management Team has overall responsibility for information governance. This involves providing high-level support to ensure that each directorate applies relevant information governance policies and controls, including compliance with this policy. In particular, directors will be asked to nominate/ confirm information asset owners and data stewards.

Senior Information Risk Owner

- 6.3 The Director of Corporate Governance is the Council's Senior Information Risk Owner (SIRO). The SIRO has delegated authority through the Corporate Management Team with specific responsibility for information risk and mitigation, including risks around the quality of the Council's data. The Governance Manager is the Deputy Senior Information Risk Owner and deputises for the SIRO as required.

Information Council

- 6.4 The Information Council (IC) has delegated responsibility, through the SIRO and the Corporate Management Team, for the development and delivery of effective information governance throughout the Council. In particular, the IC will provide the necessary ownership and advocacy required to support, co-ordinate, promote, monitor and assure compliance with this policy.

Data Council

- 6.5 The Data Council has delegated authority through the IC and supports the implementation of the information governance strategy particularly the Data Quality work stream. The Data Council is chaired by the Information Governance Manager. Key responsibilities include:

- 6.5.1 Supporting and improving data quality in the Council
- 6.5.2 Supporting the development of guidance and training around data quality
- 6.5.3 Providing information and guidance on data management processes

Information Governance Unit

- 6.6 The Information Governance Unit will support the implementation of this policy as set out in the IC annual plan.

Managers and supervisors

- 6.7 All managers must:
- 6.7.1 Ensure that clearly documented systems and processes are in place to deliver high quality data
 - 6.7.2 Ensure arrangements in place to quality assure data, and carry out on a regular basis
 - 6.7.3 Ensure staff have the necessary skills and knowledge required to capture, process and deliver high quality data
 - 6.7.4 Never knowingly use inaccurate or incomplete data for reporting purposes, and highlight any known risks or issues to the Information Asset Owner
- 6.8 As the Information Asset Register is developed and extended to identify and manage the Council's information assets, relevant managers will be designated as Information Asset Owners, including responsibilities for data quality

Staff

- 6.9 All staff must:
- 6.9.1 Read, understand and follow this policy and any associated procedures that relate to the capture, use and management of Council data
 - 6.9.2 Handle Council data in a way which is responsible and make every effort to ensure its accuracy, validity, reliability, timeliness, relevance and verifiability

- 6.9.3 Communicate any risks or concerns to line managers concerning the capture or use of data
- 6.10 As part of their role and remit, individuals may also be nominated as Data Stewards (by Information Asset Owners) with operational responsibility for data quality issues.

Related documents

- 7.1 Related documents include:
 - 7.1.1 Information Governance Strategy
 - 7.1.2 Information Governance Policy
 - 7.1.3 Records Management Policy
 - 7.1.4 Freedom of Information Policy
 - 7.1.5 Data Quality Policy
 - 7.1.6 ICT Acceptable Use Policy
 - 7.1.7 Employee Code of Conduct
 - 7.1.8 Open Data Strategy

Equalities impact

- 8.1 There are no equalities issues arising from this policy.

Sustainability impact

- 9.1 There are no sustainability issues arising from this policy.

Risk assessment

- 10.1 The risks of not implementing this policy include:
 - 10.1.1 Ineffective and poor decision making
 - 10.1.2 Lack of accountability and reliable performance information
 - 10.1.3 Inefficient service delivery
 - 10.1.4 Financial loss or monetary penalty imposed
 - 10.1.5 Detrimental impact on Council business and service delivery
 - 10.1.6 Non-compliance with legislation and potential litigation

Review

- 11.1 This policy will be reviewed annually or more frequently if required by significant changes in legislation, regulation or business practice. It will be reviewed by the Information Council and presented to Council committee annually, in line with the Council's Policy Framework.

Appendix 5- Freedom of Information Policy

Policy statement

- 1.1 This Policy formalises the City of Edinburgh Council's approach to the management and release of information and sets out the Council's commitment to the following principles:
 - 1.1.1 To conduct its business in such a way as to promote openness and accountability thereby maximising public trust in the workings of the Council
 - 1.1.2 To take into account customer needs in presenting information
 - 1.1.3 To maximise the publication of information through the Council's publication scheme
 - 1.1.4 To respect personal privacy in accordance with the principles set out in the Freedom of Information (Scotland) Act 2002, the Environmental Information (Scotland) Regulations 2004, and the Data Protection Act 1998.

Scope

- 2.1 This policy applies to the rights of any person, anywhere in the world to request access to recorded information held by the Council, subject to certain limited conditions and exemptions, exceptions or limitations.
- 2.2 The policy is applicable to all recorded information, of any age and in any format, held by the Council within the definition contained in the Freedom of Information (Scotland) Act 2002 and the Environmental Information (Scotland) Regulations 2004. It is also applicable to all spatial data sets, or spatial data services about the environment or meta data relating to these as defined by the INSPIRE (Scotland) Regulations 2009.
- 2.3 This policy applies to all employees of the Council and elected members when carrying out official duties for the Council. It also applies to third parties who hold or manage information on the Council's behalf.
- 2.4 Any contractor or agent performing work for, or on behalf of the Council, will be required to assist the Council in implementing its obligations under the Act and Regulations, with particular reference to the prompt provision of information where requested by the Council.

Definitions

- 3.1 The definitions below concern specific terms and descriptions used in this policy.
- 3.1.1 **Exception:** This is a regulation under regulations 10 or 11 of the Environmental Information (Scotland) Regulations 2004 which, if applicable to information covered by the request, means that the information does not need to be disclosed.
- 3.1.2 **Exemption:** This is a section in Part 2 of the Freedom of Information (Scotland) Act 2002 which, if applicable to information covered by the request, means that the information does not need to be disclosed.
- 3.1.3 **Information:** This is information recorded in any form or format held by the Council, or information held by a third party on the Council's behalf.
- 3.1.4 **Limitation:** This is a regulation under regulation 10 of the INSPIRE (Scotland) Regulations 2009 which, if applicable to the information covered by the request, means that the information does not need to be disclosed.
- 3.1.5 **Personal data:** This is information about a living individual who can be identified from that information or from additional information held, or obtained, by the Council. Examples of personal data are contained in paper files, electronic records and visual and audio recordings.
- 3.1.6 **Records management:** These are the processes and practices that ensure Council records are systematically controlled and maintained, covering the creation, storage, management, access, and disposal of records, in compliance with best practice, legal obligations and policy requirements. International Standard **ISO15489** covers the fundamentals of good records management.
- 3.1.7 **Scottish Information Commissioner:** is responsible for the promotion and enforcement of the Freedom of Information (Scotland) Act 2002, the Environmental Information (Scotland) Regulations 2004 and the INSPIRE (Scotland) Regulations 2009 and any associated Codes of Practice.

Policy content

Legislation

- 4.1 The Freedom of Information (Scotland) Act 2002 and the Environmental Information (Scotland) Regulations 2004 provide any person, anywhere in the world, with a general right of access to recorded information held by the Council. This is subject to certain limited conditions and exemptions/exceptions.
- 4.2 The legislation also places certain duties on the Council regarding the management of its records. The Council is also required to prepare and

maintain a Publication Scheme, setting out the information that it routinely makes available, and which can be accessed quickly and easily.

- 4.3 The INSPIRE (Scotland) Regulations 2009 provide any person, anywhere in the world, with a right of access to any spatial datasets or spatial data services about the environment together with the meta data related to these, subject to certain conditions and limitations.
- 4.4 The Scottish Ministers have published two Codes of Practice under the Freedom of Information (Scotland) Act 2002. These provide best practice guidance to public authorities on discharging their function under the Freedom of Information (Scotland) Act 2002 as follows:-
 - 4.4.1 Section 61 Code of Practice on Records Management; and
 - 4.4.2 A combined Section 60 and 62 Code of Practice on the Discharge of Functions by Scottish Public Authorities under the Freedom of Information (Scotland) Act 2002 and the Environmental (Scotland) Regulations 2004.

Rights to information

- 4.5 A request for recorded information held by the Council can be made by any person.
- 4.6 A request for information may be covered by one or more of three information rights:
 - 4.6.1 A request for recorded information held by the Council, other than for the requestors own personal data or for environmental information, is a Freedom of Information request.
 - 4.6.2 A request for any recorded information which relates to matters such as air, water, soil, landscaping, natural sites, biodiversity, human health and safety and decisions and activities affecting these is a request covered by the Environmental Information (Scotland) Regulations 2004.
 - 4.6.3 A request for spatial datasets or spatial data service about the environment or the meta data related to these which is held by the Council is a request covered by the INSPIRE (Scotland) Regulations 2009.
- 4.7 The Council will ensure that any information that has been requested will be made available, unless there is a compelling reason and basis in law for withholding it.

Publication scheme

- 4.8 In line with the requirements of the Freedom of Information (Scotland) Act 2002 the Council has a publication scheme which is available on the website. This is a guide to the information that the Council routinely makes publicly available.

Open Data Initiative

- 4.9 The Council will, where possible, identify data which is already readily available and which can be shared publicly.

Dealing with requests

- 4.10 The Council will respond to all requests promptly, and within the statutory response period of 20 working days following receipt of a valid request.
- 4.11 Under the Environmental Information (Scotland) Regulations the Council can extend the timescale for responding to a request in certain circumstances. The requestor will be notified if the Council does intend to extend the timescale for response and the reason why.
- 4.12 The Freedom of Information (Scotland) Act 2002 provides a number of exemptions which can be relied upon to withhold information. The Environmental Information (Scotland) Regulations provides a number of exceptions which can be relied upon to withhold information, and under the INSPIRE (Scotland) Regulations limitations can be used to withhold information.
- 4.13 Where the Council is seeking to rely on any exemption, exception or limitation for withholding information from a requestor, it will explain, in detail, why this applies to the information requested.

Redaction

- 4.14 The Council will not routinely redact the names of Council officials from information produced in the course of their work, but will take into account specific circumstances, and the latest guidance from Information Commissioner's Office and the Office of the Scottish Information Commissioner.

Charges

- 4.15 There is generally no charge for information provided in the Council's Publication Scheme, unless otherwise stated and in some cases there is a charge for printing and postage.
- 4.16 As far as other requests are concerned, the Council is not entitled to charge for requests that cost less than £100 to process. The Council will charge 10% of the cost of dealing with requests costing between £100 and £600 respectively. These charges are based on the:
- 4.16.1 Estimated costs of staff time to find information;
 - 4.16.2 Any costs associated with putting information into a particular format; and
 - 4.16.3 Copying and postage costs.
- 4.17 The Council cannot, and does not, charge for the time taken to decide whether it holds relevant, recorded information, or whether it can be disclosed.

- 4.18 Different charges apply under the Environmental Information (Scotland) Regulations 2004.
- 4.19 Unlike the Freedom of Information (Scotland) Act 2002, the Environmental Information (Scotland) Regulations 2004 do not specify an upper or limit when fees can be charged. The Environmental Information (Scotland) Regulations prescribe that any fee charged must not exceed the actual costs to the Council of producing the information requested. The Council can only charge fees under the Regulations in line with its published charging schedule. In assessing what cost to charge, the Council considers the matters covered above regarding Freedom of Information (Scotland) Act 2002 requests.
- 4.20 Under the INSPIRE (Scotland) Regulations the Council can only charge the public to view information where that charge secures the maintenance of spatial data sets and spatial data services, especially in cases which involve very large volumes of frequently updated data.
- 4.21 The Council may charge the public a reasonable sum for downloading services, enabling copies of spatial data sets, or parts of such sets to be downloaded and, where practicable, accessed directly.
- 4.22 The Council may charge the public a reasonable sum for transformation services, enabling spatial data to be transformed with a view to achieving interoperability and also services which allow spatial data services to be invoked.
- 4.23 Charges levied by the Council under the INSPIRE (Scotland) Regulations 2009 are required to be kept to the minimum required and will be in line with existing Council charging policies.

Disclosure Log

- 4.24 The Council has a publicly available disclosure log which records all requests for information received. This also shows the responses issued in relation to those requests.

Requirements for Review

- 4.25 Where an applicant is dissatisfied with the response to their information request, they are entitled to seek a review of the Council's decision. A response to their requirement for review will be provided within 20 working days.

Appeal

- 4.26 If the applicant remains dissatisfied following the outcome of their requirement for review, they are entitled to appeal to the Scottish Information Commissioner, who will investigate the Council's handling of their information request.

Records Management

- 4.27 Information is an extremely valuable resource and must be looked after properly. In managing its records, the Council will comply with its duties under the Freedom of Information (Scotland) Act 2002 and the Section 61 Code of Practice on Records Management.

Compliance

- 4.28 All recorded information will be managed in accordance with the Freedom of Information (Scotland) Act 2002 and the associated Codes of Practice.

Monitoring and reporting

- 4.29 Compliance with this policy and related procedures will be monitored by the Information Governance Manager.
- 4.30 Performance reports will be submitted to Elected Members and Corporate Management Team on a regular basis.

Implementation

- 5.1 This policy will be implemented as part of the Information Council's annual action plan.

Roles and responsibilities

- 6.1 The Information Governance Policy provides a detailed explanation concerning overall roles and responsibilities around information governance. This section provides a summary of those responsibilities, but also outlines specific responsibilities in relation to compliance with the Freedom of Information (Scotland) Act 2002 and associated legislation.

Elected Members

- 6.2 All Elected Members will be provided information and training on the Freedom of Information (Scotland) Act 2002, the Environmental Information (Scotland) Regulations 2004 and the INSPIRE (Scotland) Regulations 2009.

Corporate Management Team

- 6.3 The Corporate Management Team has overall responsibility for information governance. This involves providing high-level support to ensure that each directorate applies relevant information governance policies and controls, including compliance with the requirements of the Freedom of Information (Scotland) Act 2002 and associated legislation.

Senior Information Risk Owner

- 6.4 The Director of Corporate Governance is the Council's Senior Information Risk Owner (SIRO). The SIRO has delegated authority through the Corporate Management Team with specific responsibility for information risk and mitigation, ensuring that any information threats and breaches are identified, assessed and effectively managed.

Governance Manager

- 6.5 The Governance Manager is the Deputy Senior Information Risk Owner and deputises for the SIRO as required.

Information Council

- 6.6 The Information Council (IC) has delegated responsibility, through the SIRO and the Corporate Management Team, for the development and delivery of effective information governance throughout the Council. In particular, the IC will provide the necessary ownership and advocacy required to support, co-ordinate, promote, monitor and assure compliance with the Freedom of Information (Scotland) Act 2002 and associated legislation.

Information Governance Unit

- 6.7 The Information Governance Unit will:
- 6.7.1 Act as the first point of contact for all freedom of information issues affecting the Council;
 - 6.7.2 Log, process and respond to all information requests received by the Council;
 - 6.7.3 Assess and log requests and allocate to the relevant service to ask them to identify any relevant, recorded information that they hold which would fulfil the request;
 - 6.7.4 Provide the final decision as to whether any exemption/exception/limitation applies to the information requested from the Council; and
 - 6.7.5 Publish details of all requests and the responses to these on the Council's disclosure log.

Freedom of Information Team Leader

- 6.8 The Freedom of Information Team Leader is responsible for co-ordinating the work of the FOI Team, as well as monitoring the manner and timescales in which requests for information are dealt with.
- 6.9 The Freedom of Information Team Leader reports on compliance with the policy and procedures and also provides monthly performance reports.

- 6.10 The Freedom of Information Team Leader also:
 - 6.10.1 Provides training and guidance on FOI policy and procedures;
 - 6.10.2 Provides training on issues relating to the Freedom of Information (Scotland) Act, the Environmental Information (Scotland) Regulations and the INSPIRE (Scotland) Regulations; and
 - 6.10.3 Administers the Council's publication scheme.

Review Officer

- 6.11 To ensure impartiality, reviews of decisions where the applicant is dissatisfied with how their response has been dealt with are carried out by the Council's Review Officer.
- 6.12 The review officer also acts as the liaison link with the Scottish Information Commissioner's office and provides submissions to the Scottish Information Commissioner in relation to any appeals made by dissatisfied applicants.

Staff

- 6.13 All Council staff will:
 - 6.13.1 Be aware of the requirements of the Freedom of Information (Scotland Act 2002, the Environmental Information (Scotland) Regulations 2004 and the INSPIRE (Scotland) Regulations 2009 and what these mean;
 - 6.13.2 Be able to identify any request that falls under the Freedom of Information (Scotland) Act 2002, the Environmental Information (Scotland) Regulations 2004 and the INSPIRE (Scotland) Regulations 2009;
 - 6.13.3 Provide advice and assistance to persons making requests for information;
 - 6.13.4 Know to pass any information request onto the Information Governance Unit; and
 - 6.13.5 Manage recorded information they hold in accordance with the procedures for records management.
- 6.14 Some Council staff may be nominated contacts within their service area for providing information to the Information Governance Unit to assist them with the provision of responses to requests. These nominated contacts are also asked to notify the Information Governance Unit of any sensitivity or confidentiality surrounding information covered by the information request.
- 6.15 Where a nominated contact within a service area is asked to provide information to the Information Governance Unit to assist them with the provision of responses to requests, any such response will be signed off by a manager prior to this being passed to the Information Governance Unit.

- 6.16 Council staff will be given awareness, induction and update training on the requirements of the Act and Regulations, as appropriate.

Related documents

- 7.1 Information Governance Strategy
- 7.2 Information Governance Policy
- 7.3 Records Management Policy
- 7.4 Freedom of Information Policy
- 7.5 Data Quality Policy
- 7.6 ICT Acceptable Use Policy
- 7.7 Open Data Policy
- 7.8 Employee Code of Conduct

Equalities impact

- 8.1 There are no equalities issues arising from this policy.

Sustainability impact

- 9.1 There are no sustainability issues arising from this policy.

Risk assessment

- 10.1 The risks of not implementing this policy include:
- 10.1.1 Distress or harm to individuals or organisations.
 - 10.1.2 Reputational damage to the Council.
 - 10.1.3 Non-compliance with legislation.

Review

- 11.1 This policy will be reviewed annually or more frequently if required by significant changes in legislation, regulation or business practice. It will be reviewed by the Information Council and presented to Council committee annually, in line with the Council's Policy Framework.

Appendix 6 - Records Management Policy

Policy statement

- 1.2 Council records are sources of administrative, evidential and historical information necessary for the effective functioning and accountability of the Council. Over time they also will provide valuable evidence and understanding of the communities it serves.
- 1.3 In order for the value of Council records to be maintained and assured, they need to be managed efficiently, transparently and consistently throughout their life-cycle; from the point they are created or received, through maintenance and use, to the time they are destroyed or permanently preserved as archival records.
- 1.4 This policy sets out the Council's responsibilities and activities in regard to this records management. It governs the management of all records created or acquired on the Council's behalf in the course of Council business.
- 1.5 This policy:
 - 1.5.1 provides the baseline requirements for good records management within the Council to ensure records are created, managed and used effectively and efficiently;
 - 1.5.2 supports the Council in complying with its statutory and regulatory obligations as well as its commitments as set out in its Information Governance Policy;
 - 1.5.3 defines records management responsibilities throughout the Council;
 - 1.5.4 underpins a working culture which acknowledges the value and benefits of accurate record creation and effective management; and
 - 1.5.5 encourages a leaner Council that retains records for only as long as required for business purposes.

Scope

- 2.5 This policy applies to:
 - 2.5.1 All records which are created received and managed in the course of City of Edinburgh Council ('the Council') business ('Council records').
 - 2.5.2 All permanent and temporary Council employees, volunteers, people on work placements and elected members when acting as officers of the Council
 - 2.5.3 All third parties and contractors performing a statutory Council function or service

Definitions

- 3.1 **Archives:** are the records which are retained permanently because of their continuing business, evidential or informational value to the Council or communities it serves.
- 3.2 **Business Unit:** is a term used for teams and sections below that of the Service Area within the Council reporting structure
- 3.3 **Council Records:** are defined as;
 - 3.3.1 recorded information in any format (including paper, microform, electronic and audio-visual formats); and
 - 3.3.2 which are created, collected, processed, and/or used by City of Edinburgh Council employees, Elected Members when undertaking Council business, predecessor bodies (e.g. Lothian Region Council, Edinburgh District Council, Edinburgh Corporation) or contractors performing a statutory Council function or service.
 - 3.3.3 and which are then kept as evidence of that business.
- 3.4 **File Plan** is a governance tool that classifies Council records in terms of Council function and activity; it acts as the baseline to connect this policy, and its related guidance and procedures, to the business processes that create, manage, use and dispose of Council records.
- 3.5 **Format** is the medium in which records are created from; most electronic formats are capable of being edited and changed continually (e.g. MS Word), 'fixed formats' do not allow this (e.g. PDF).
- 3.6 **Information asset owners:** senior officers involved in managing a business area(s) with responsibility for the information assets within their respective business area(s).
- 3.7 The **Information asset register** is a governance tool that lists the Council's key information assets.
- 3.8 **Public Records (Scotland) Act 2011:** requires public authorities to detail their records management policies, procedures and responsibilities in a Records Management Plan, which is subject to review by the Keeper of the Records of Scotland.
- 3.9 **Records management:** are the processes and practices that ensure Council records are systematically controlled and maintained, covering the creation, storage, management, access, and disposal of records, in compliance with best practice, statutory requirements and policy obligations.
- 3.10 **Records management manual** – a document that details how records are created, maintained and disposed of within a business unit, service area, project or working group.

- 3.11 **Recordkeeping systems:** are physical filing systems or IT business systems that hold and manage Council records.
- 3.12 **Retention Rules:** identify when closed records or files can be disposed of and what should happen to them at that point. They can be broken down into four parts;
 - 3.12.1 Activity / Record Description – provides the context on what is covered by the retention rule.
 - 3.12.2 Trigger – indicates the moment that the retention period starts applying; usually around the event or date that “closes” a record.
 - 3.12.3 Retention Period – how long you hold onto a record beyond the trigger point.
 - 3.12.4 Disposal Action – the action required once a record has reached the end of its retention period.
- 3.13 **Vital records:** are records classified as being essential to the continuation of Council business.

Policy content

- 4.1 To ensure effective management, it is essential that the following policy requirements are understood and applied consistently by all Council employees and services.
- 4.2 **Creation**
 - 4.2.1 The City of Edinburgh Council is the owner of all Council records, including those created by Elected Members, contractors or consultants.
 - 4.2.2 Council records must be accurate, authoritative and comprehensive in content in order to provide reliable evidence of Council business.
 - 4.2.3 Council records must be titled and referenced in a manner consistent and relevant to the business activity to ensure that they can be easily retrieved, understood and managed.
 - 4.2.4 Council records should be created in fixed formats where ever possible.
- 4.3 **Storage**
 - 4.3.1 Council records must be adequately protected and stored securely to prevent unauthorised access.
 - 4.3.2 Electronic Council records must be stored on the Council's network in folder structures that conform to the Council's File Plan, or in valid electronic record keeping systems.

- 4.3.3 Physical Council records no longer needed for immediate or routine use should be sent to the Council's Records Centre for storage and management.
- 4.3.4 Council records must always be retrievable for business, performance, audit and public rights of access purposes up until they are destroyed.

4.4 Management

- 4.4.1 Council records must have access controls and audit logging in place that are appropriate to the sensitivity and risk of their content.
- 4.4.2 Council records must remain accessible and usable for as long as they are required to be retained under the Council's Retention Schedules.
- 4.4.3 Council records that are vital to the continuity of Council business must be identified as Vital Records by the business units that hold them.
- 4.4.4 Council records must not be distributed or copied unnecessarily.

4.5 Disposal

- 4.5.1 No Council record may be destroyed without appropriate authorisation and due regard to legal obligations.
- 4.5.2 All destructions of Council records must be logged by the disposing business unit. This log must be kept for no less than 20 years on a rolling basis.
- 4.5.3 Council records must be destroyed securely, in compliance with the Council procedures.
- 4.5.4 Each Directorate will have an authorised Retention Schedule that details how long records of its services and activities should be retained for.

4.6 Transfer to Archive

- 4.6.1 Council records identified as having enduring evidential or historical value are to be transferred to the professional care of Edinburgh City Archives for permanent preservation after they have ceased to be of business use.
- 4.6.2 Records from the Council's predecessors (e.g. Edinburgh District Council, Edinburgh Corporation, civil parishes etc.) must also be transferred to Edinburgh City Archives.
- 4.6.3 Council records in the care of Edinburgh City Archives will be stored, arranged, described, indexed and made accessible in accordance with professional archival standards and recommendations.

4.7 Records Management Manuals

- 4.7.1 Every business unit will have Records Management manuals that document the administrative procedures around Council business activities, dictating who, when and how records are to be created, stored, managed and disposed or transferred.
- 4.7.2 Records management manuals must be developed locally within the Council services they cover but they should be approved by a relevant working group, or management team as complying with Council policies, regulatory guidance and statutory requirements.
- 4.7.3 Managers will routinely review their records management manuals and these will also be subject to corporate assessment and audit.
- 4.7.4 As part of contract due diligence and monitoring, third parties and contractors will be asked to provide similar documentation for their own administrative procedures around the Council records they will create or receive and then manage.

4.8 Public Records (Scotland) Act, 2011 – Records Management Plan

- 4.8.1 The Council commits to submitting and annually reviewing its Records Management Plan, as per statutory requirements set out in the Public Records Scotland Act, 2011.
- 4.8.2 The Records Management Plan will be developed and reviewed by the Information Governance Unit in conjunction with other relevant officers and overseen by the Information Council.
- 4.8.3 The draft or reviewed Plan will be approved by Council Management Team and signed off by the Chief Executive before being submitted to the Keeper of the Public Records of Scotland.

Implementation

- 5.1 This policy will be implemented through the Information Council's annual plan.
- 5.2 The initial key measurement of success will be the development and maintenance of records management manuals across the Council but other success measurements will be;
 - 5.2.1 the ongoing management and consistent use by staff of the Council's Retention Schedules
 - 5.2.2 the development, approval and maintenance of the Council's File Plan
 - 5.2.3 the approval of the Council's Records Management Plan by the Keeper of the Public Records of Scotland

- 5.2.4 the development and roll out of records management training by the Information Governance Unit for staff
- 5.3 The Information Governance Unit will conduct rolling and periodic reviews of records management manuals and compliance with this Policy within service areas. Results of these assessments will be provided to the relevant Directorate Records Officer and to the Information Council, when and where required.
- 5.4 Separately, Council IT systems that create and manage electronic records will be subject to assessment by the Information Governance Unit and ICT Solutions to identify and help manage any information risks. Results of these assessments will be reported to the relevant Information Asset Owners and to the Information Council.

Roles and responsibilities

- 6.1 The Information Governance Policy provides a detailed explanation concerning overall roles and responsibilities around information governance. This section provides a summary of those responsibilities, but also outlines specific responsibilities in relation to managing Council records.
- 6.2 The **Chief Executive** has overall executive responsibility for the Council's records policy and for supporting its application throughout the organisation. The Chief Executive is also responsible for the management of the City of Edinburgh Council's records under section 1(2a) of the Public Records (Scotland) Act, 2011.
- 6.3 **Directors** have a general responsibility to ensure that records within their Directorate are managed according to statutory responsibilities and Council policies. They must do this by ensuring that;
 - 6.3.1 there is an up to date, authorised, comprehensive and relevant retention schedule for their directorate
 - 6.3.2 records management manuals are issued and reviewed within their service areas
 - 6.3.3 they have at least one officer fulfilling the role of a Directorate Records Officer
 - 6.3.4 ensuring contracts with third parties performing a public function contain appropriate clauses on expected records management behaviour
- 6.4 The **Director of Corporate Governance** as the **Senior Information Risk Owner** (SIRO) has the delegated responsibility to authorise, in conjunction with each Director, retention schedules that define how long records should be

retained and what should happen to them subsequently. The Governance Manager is the Deputy SIRO and will act on the Director's behalf as and when required.

6.5 **All Managers** must;

- 6.5.1 ensure that this policy and any associated records management procedures and guidance are understood by all staff within their business units and that these are incorporated in routine administrative practices
- 6.5.2 ensure that all administrative practices of their business units are comprehensively documented within records management manuals
- 6.5.3 maintain a disposal log of all Council records that have been destroyed within their business units on a rolling 20 year basis
- 6.5.4 identify those Council records that are vital to the continuation of Council business within their records management manuals and inform the Information Governance Unit
- 6.5.5 consult the Information Governance Unit and their Directorate Records Officer when changes to the Retention Schedules or File Plan are needed to be made
- 6.5.6 identify and record any existing or emerging risks around Council records on local, divisional and directorate risk registers
- 6.5.7 undertake annual information governance self assessments to ensure ongoing compliance with this policy and associated information governance activities
- 6.5.8 provide a statement of assurance to evidence information governance compliance

6.6 **Employees** must;

- 6.6.1 read, understand and follow this policy and any associated records management procedures and guidance that are relevant to their work
- 6.6.2 read, understand and follow any records management manuals that are relevant to their work
- 6.6.3 Identify and report any risks to Council records to their line manager

6.7 **Elected Members** have the same responsibility to manage and dispose of records created in their role as representatives of the Council according to relevant policies and procedures.

6.8 **Third parties (e.g. contractors, voluntary and not for profit organisations) performing a public function for the City of Edinburgh Council** must also

adhere to the requirements set out in this policy and have their own administrative practices documented and assessed in similar ways to Council business units as part of the tendering and contract monitoring processes. To do this they must allow access by relevant Council staff to any Council records they create, receive or manage, including any records keeping system they may hold them in.

6.9 Directorate Records Officers will;

6.9.1 have delegated authority to take action and make decisions on records management issues within their directorate.

6.9.2 monitor the administrative practices and records management manuals of their directorate, as well as their directorate retention schedule.

6.9.3 act as a liaison with the Information Governance Unit on records related projects and issues.

6.10 The **Information Governance Unit** is part of the Governance Service with responsibility for the day to day operation and delivery of information governance within the Council. In relation to records management it will;

6.10.1 provide professional guidance, advice and support on the management of Council records for all Council directorates;

6.10.2 create, maintain and renew training modules and toolkits as appropriate;

6.10.3 provide assurance by review of records management manuals;

6.10.4 develop and maintain the Council's File Plan;

6.10.5 maintain and review the Council's Retention Schedules;

6.10.6 oversee the running of the Council's Records Centre;

6.10.7 develop, implement and maintain the Council's Records Management Plan; and

6.10.8 carry out information governance assessments.

6.11 **Edinburgh City Archives** is specifically designated the place of deposit for Council records required for permanent preservation, whether for business or cultural purposes. It is responsible for preserving, promoting and making accessible these records, and other historical records that may be acquired by the Council.

6.12 **ICT Solutions** has a role to support the assessment of existing Council recordkeeping systems against this policy as well as helping to ensure that records management requirements are properly considered as part of the ICT procurement process.

Related documents

7.1 Council Policy

- 7.1.1 Information Governance Strategy
- 7.1.2 Information Governance Policy
- 7.1.3 Open Data Strategy
- 7.1.4 Data Protection Policy
- 7.1.5 Data Quality Policy
- 7.1.6 Freedom of Information Policy
- 7.1.7 ICT Acceptable Use Policy
- 7.1.8 Employee Code of Conduct

7.2 Legislation & Statutory Codes of Practice

- 7.2.1 [Local Government \(Scotland\) Act, 1994](#)
- 7.2.2 [Data Protection Act, 1998](#)
- 7.2.3 [Public Records Scotland Act, 2011](#)
- 7.2.4 [Code of Practice on Records Management issued under Section 61 of the Freedom of Information \(Scotland\) Act, 2002](#)

7.3 Standards

- 7.3.1 *ISO 30300 & 30301 – Management Systems for Records*; establishes a model of best practice and assessment for records management within organisations, covering; policy development, statutory and regulatory awareness, responsibilities, process design and performance measuring.
- 7.3.2 *ISO 15489:2001 – Information and documentation; Records management*; sets out standard terminology, concepts and requirements for records management

Equalities impact

- 8.1 There are no equalities issues arising from this policy.

Sustainability impact

- 9.1 There are no sustainability issues arising from this policy.

Risk assessment

- 10.1 Risk of reputational damage and audit complications as a result of non-compliance with the Public Records (Scotland) Act, 2011.
- 10.2 Risk of monetary penalties and reputational damage through limited capability to identify and address statutory non-compliance with the Data Protection Act,

1998; specifically Principles 3 (Adequate, relevant and not excessive), 4 (Accurate and maintained), 5 (Over retention) and 7 (Unauthorised access and processing).

- 10.3 Risk of civil and criminal penalties as a result of a failure to identify and address non-compliance with other legislation that have requirements around records including, but not limited to, education, employment, finance, governance, health & safety and social care.
- 10.4 Risk of civil and criminal penalties as well as reputational damage and business continuity issues through poor decision making and accountability based on inadequate and poorly managed Council records.
- 10.5 Risk of weak internal governance and audit complications through a failure to raise and maintain the awareness of Council staff of records management requirements, best practice and standards.
- 10.6 Risk of excessive physical and IT storage costs through a failure to identify and apply appropriate retention rules to Council records.
- 10.7 Risk to citizens and clients that the Council will mismanage their service provision due to inadequate and poorly managed Council records.

Review

- 11.2 In line with the Council's Policy Framework, this policy will be reviewed annually or when required by significant changes to the Council's Records Management Plan or with legislation, regulation or business practice.

Corporate Policy and Strategy Committee

10.00am, Tuesday 30 September 2014

2014 Employee Survey: results and next steps

Item number 7.5
Report number
Executive/routine executive
Wards

Executive summary

Overall, the 2014 survey results show a positive picture; there is an upward trend across almost all measures. There are improvements in relation to the actions that were taken since the 2012 survey, especially around line management. Despite significant change, there is greater pride in working for the Council and a rise in personal morale. However, despite a rise in job satisfaction, the results show pressures around workload, a need to prioritise work objectives and distribute resources more effectively.

Understanding and support for change is considerably high. There is now a role for managers to cascade the messages of Pride in Our People, the Council's vision and values; and importantly, consult employees about changes before they affect them.

In most cases, the results are similar to those of public sector workers across the UK, although City of Edinburgh Council employees tend to hold more positive views than average on their working environment, objectives and supporting the need for change. The Council has been accredited as an Investor in People (IiP) organisation since 2004 and retained Gold Status in 2014 following the 2013/14 assessment.

Links

Coalition pledges
Council outcomes
Single Outcome Agreement

2014 Employee Survey: results and next steps

Recommendations

- 1.1 It is recommended that the Corporate Policy and Strategy Committee:
 - 1.1.1 Note the content of this report;
 - 1.1.2 Agree the next steps and proposed actions; and
 - 1.1.3 Agree that a progress report will be submitted for committee consideration after 6 months.

Background

- 2.1 This is the sixth council wide survey to monitor how well we are doing in relation to employee engagement, the impact of change and working for the Council.
- 2.2 Ipsos MORI was commissioned to undertake the survey fieldwork to ensure employee confidentiality. The survey was conducted between 28 April and 13 June 2014. The survey was managed by Business Intelligence, supported by leads for each service area.
- 2.3 All Council employees were invited to participate in the survey. In total, 7336 members of staff completed the survey, giving an overall response rate of 39%. 1,406 employees completed a paper questionnaire and 5,930 completed the survey online.

Table 1 Survey response levels

Service Area	Final 2014 rate	Final 2012 rate	Difference
Council overall	39%	36%	+3%
Children and Families	37%	24%	+13%
Economic Development	91%	101% ¹	-10%
Corporate Governance	62%	65%	-3%
Health and Social Care	39%	44%	-5%
Services for Communities	39%	37%	+2%

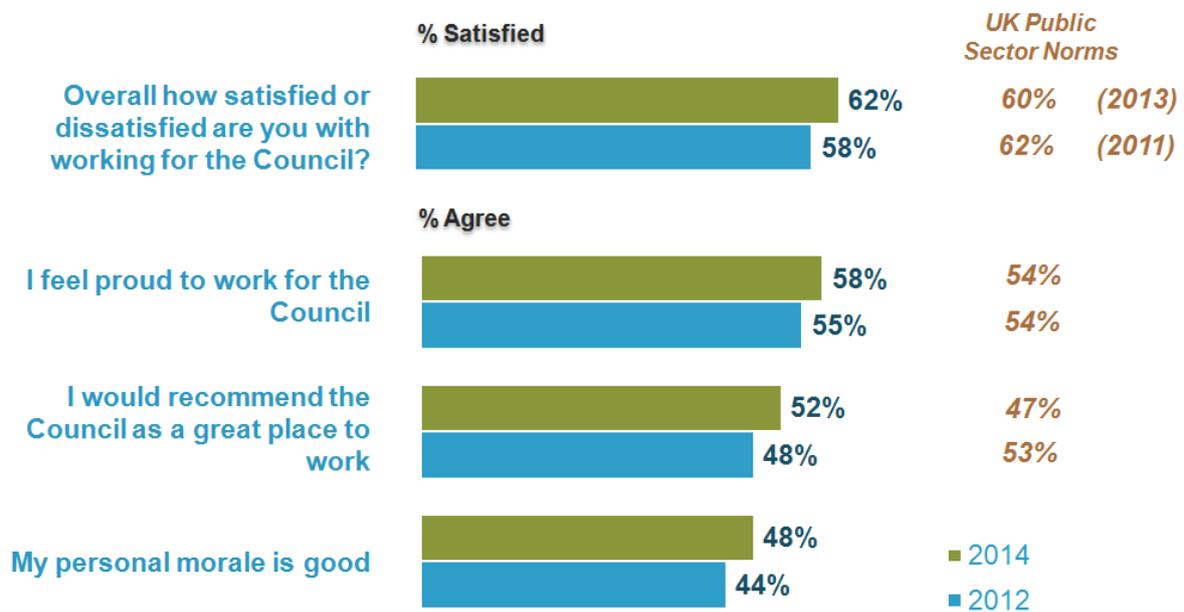
¹101% was the 2012 response rate for Economic Development as more responses were received than the headcount. This is possibly due to structural changes during the time of the survey fieldwork.

Main report

3.1 Working for the Council

3.1.1 Job satisfaction has increased by 4% since 2012, with 62% of employees satisfied, returning to 2009 and 2006 levels. Despite significant change across the Council and a fundamental review of how some services are provided, there is greater pride in working for the Council and a rise in personal morale. Over half of employees would recommend the Council as a great place to work. These results are generally higher than the UK average for local authorities.

Figure 1 Views on working for the Council



3.1.2 Working environment is also regarded positively. The majority (83%) agree that they are treated with respect by their colleagues and 76% say they are treated fairly at work.

3.1.3 Job satisfaction is strongly linked with views on workload, leadership and perceptions of fair treatment, as illustrated in Figure 2.

Figure 2 Drivers of satisfaction



3.2 Workload and resources

3.2.1 Generally, employees view their work positively. The majority of employees feel that their work:

- is interesting (86%) and challenging (73%);
- gives them a sense of accomplishment (73%); and
- makes the best use of their skills and abilities (67%).

3.2.2 Figure 3 shows that while employees agree that they have the right tools to do their job effectively, they are less likely to feel that they achieve a good work-life balance or have an acceptable workload.

Figure 3 Views on workload and resources

% CEC Agree	% CEC Agree					
	Children & Families	Economic Development	Corporate Governance	Health & Social Care	Services for Communities	
Have the skills I need to do my job effectively	90%	92%	87%	93%	90%	86%
Have clear work objectives	80%	84%	77%	85%	82%	70%
Get the information I need to do my job well	66%	69%	66%	74%	65%	59%
Have the right amount of responsibility	64%	66%	65%	70%	67%	57%
Have the tools I need to do my job effectively	63%	62%	62%	73%	68%	58%
Achieve a good balance between my work life and private life	59%	54%	67%	72%	66%	60%
Have an acceptable workload	48%	42%	57%	72%	56%	50%

3.3 Line management and performance

3.3.1 Perceptions of line managers and supervisors are generally positive and have improved particularly in the following ways:

- being approachable and available (76% agree, up 6%);
- listening to ideas and suggestions (71% agree, up 8%); and
- being open and honest (71%, up 4%).

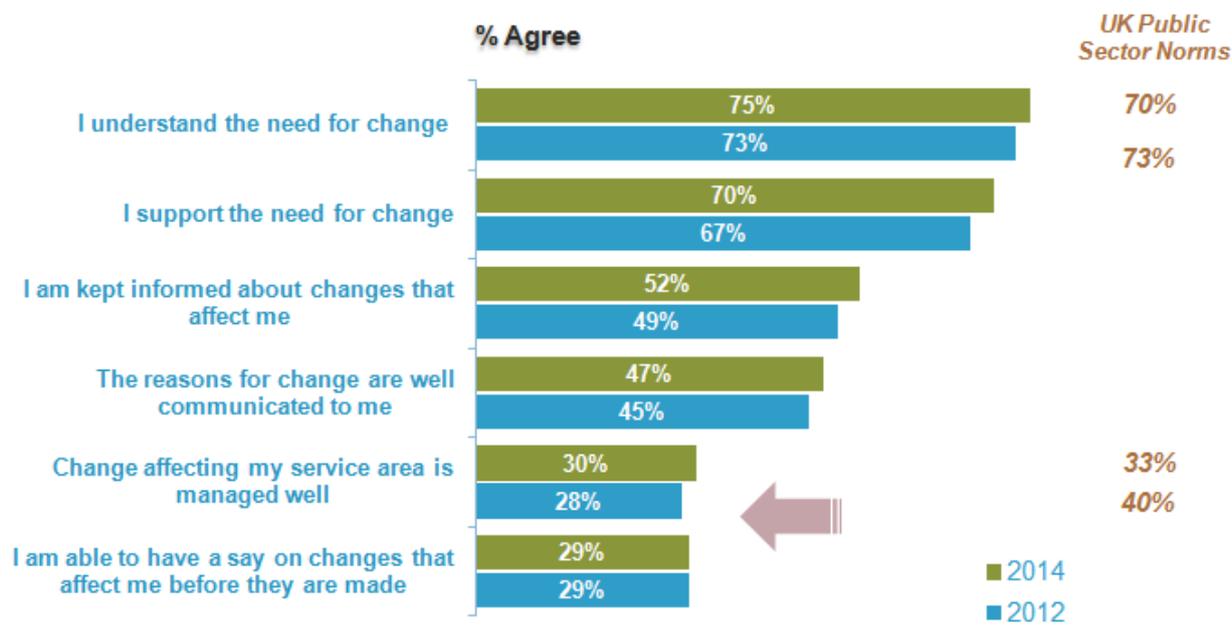
3.3.2 A lower proportion (58%) agree that line managers/supervisors delegate responsibility effectively which might explain perceptions of workload.

3.3.3 There are improvements in performance management with more employees expressing that the feedback they receive helps to improve their performance (53%) and that their performance is evaluated fairly (60%). Around seven in ten employees have had a PRD in the past 12 months, which is similar to 2012.

3.4 Leadership and change management

3.4.1 Understanding the need for change is high across the Council, up by 2% since 2012 and higher than the UK average. On the whole, the majority say they support the need for change (this varies from 71% in Services for Communities to 86% in Corporate Governance). However, the results indicate that employees could have been kept better informed about the changes that affect them. This might explain why fewer employees agree that change affecting their service area is managed well, although this has improved since 2012.

Figure 4 Views on change management



3.4.2 Around half of employees feel that their service area is managed well and that senior managers in their service area are sufficiently visible. Just over a third agree that their Director and Heads of Service have a clear vision for the future

of the Council and 35% have confidence in the decisions made by their Director and Heads of Service. However, there is a high awareness of and commitment to service area aims and objectives amongst the majority (over 80%). Attitudes towards aims and objectives amongst Council employees are considerably more positive than among other public sector employees across the UK.

3.4.3 Significant improvements have been made around leadership in Corporate Governance where 56% (up by 17%) of employees agree that the service area has a clear vision and 62% (up by 8%) say senior managers are visible. 56% (up by 11%) agreed that the service area is managed well and 45% (up by 10%) have confidence in decisions made. This is likely to be the impact of two annual staff conferences focusing on the vision and priorities of the service area, open door sessions by senior managers, and the Director's newsletter.

3.5 Taking action

3.5.1 Although actions have been undertaken since the 2012 survey, only 17% of employees agreed that they had seen improvements or associated these with the survey while 31% believe that appropriate action will be taken on the results from this survey (up 9% since 2012).

3.5.2 When asked (unprompted) what they would like the Council to change in order to make it a great place to work the top five themes included:

- resources and workload (30%);
- communications (26%);
- management style (26%);
- leadership (25%); and
- managing change (22%).

3.6 Key strengths and opportunities for improvement

3.6.1 Line management, working environment and conditions, fair treatment and inclusion are generally areas of strength for the Council. The emphasis here should be on acknowledging the success in these areas and maintaining performance.

3.6.2 The evidence points to the need to increase employee engagement on the strategic direction in each service area and the reasons for change: this can have a strong influence on how people feel about working for the Council and their personal morale. Progress has been made through Pride in Our People (PiOP) manager events. There is now a role for managers to cascade the messages of PiOP, the Council's vision and values, and, importantly, consult employees about changes before they affect them.

3.6.3 There is a need to continue to develop our internal communications channels especially staff feedback on how their participation is influencing change and

making a difference. A 'we said we did' campaign will be implemented based on the results of this survey together with the results of the Investors in People audit and other sources of employee feedback. Feedback is already being communicated from the Pride in Our People events and the 'have your say' boards.

3.6.4 While performance management has improved, perceptions of workload and work-life balance are areas of concern. Areas for improvement should be considered in terms of distributing work more effectively, prioritising work objectives and identifying ways to complete tasks more efficiently.

3.7 Next Steps

3.7.1 These are:

- a) **Communications** - the findings will be communicated to elected members, senior management teams in each service area and division and all Council employees.
- b) **Further analysis** - the survey data will be analysed at a local level to explore trends and differences between service area divisions and groups. Feedback from the liP assessment will also be considered to address the development needs and build on our strengths.
- c) **Improvement planning** - currently each service area has its own People Plan and these will be updated with the actions to reflect the survey findings using the 'we said we're doing' approach.
- d) **Monitoring** – progress made on actions undertaken will be reported to committee 6 months after they have been agreed. Employee engagement will also be monitored on a quarterly basis through a tracker survey and reported through the Corporate Performance Management Framework.

Measures of success

- 4.1 The success of activities will continue to be measured through:
- a. service specific staff conferences, focus groups and opportunities to feedback directly to senior managers; and
 - b. improvements in the level of employee engagement and satisfaction measured by a quarterly employee engagement tracker and the council wide bi-annual employee survey.

Financial impact

5.1 The cost of the survey was £38,487 and has been funded by existing budgets. Each service area has contributed to the costs of the survey in proportion to the size of the service. To minimise cost briefings to management teams and further analysis of the results have been undertaken by the Business Intelligence team.

Risk, policy, compliance and governance impact

- 6.1 Ipsos MORI are accredited with ISO 20252:2006, the international Market Research Standard for quality control procedures. This guarantees that the data remains anonymous and secure.

Equalities impact

- 7.1 Every effort was made to make the survey accessible to all Council employees. The results of the survey have also been broken down by demographic characteristics to evaluate impact on equalities groups and areas for improvement.

Sustainability impact

- 8.1 The survey was largely carried out online to minimise environmental impact. The communication of the results will also be done electronically where appropriate.

Consultation and engagement

- 9.1 Trade Unions were consulted on the survey design and approaches for engaging employees. The survey questions were piloted with 69 employees from different service areas. There will be further engagement within services in terms of discussing the results with teams and improvement planning.

Background reading/external references

[Item 5: Employee Survey 2012 Headline Results and Next Steps, Policy and Strategy Committee, 2 October 2012](#)

[Item 7.1: 2012 Employee Survey Update, Corporate Policy and Strategy Committee, 14 May 2013](#)

[Item 7.1: 2012 Employee Survey Update, Corporate Policy and Strategy Committee, 3 September 2013](#)

Alastair D Maclean

Director of Corporate Governance

Contact: Davina Fereday, Corporate Manager, Business Intelligence

E-mail: Davina.fereday@edinburgh.gov.uk | Tel: 0131 529 7040

Links

Coalition pledges

Council outcomes

CO24 - The Council communicates effectively internally and externally and has an excellent reputation for customer care

CO25 - The Council has efficient and effective services that deliver on objectives

CO26 - The Council engages with stakeholders and works in partnership to improve services and deliver on agreed objectives

CO27 - The Council supports, invests in and develops our people

Single Outcome Agreement

Appendices

1 MORI presentation of the key findings

2 Summary of results by service area

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The City of Edinburgh Council Employee Survey 2014

Results presentation - August 2014

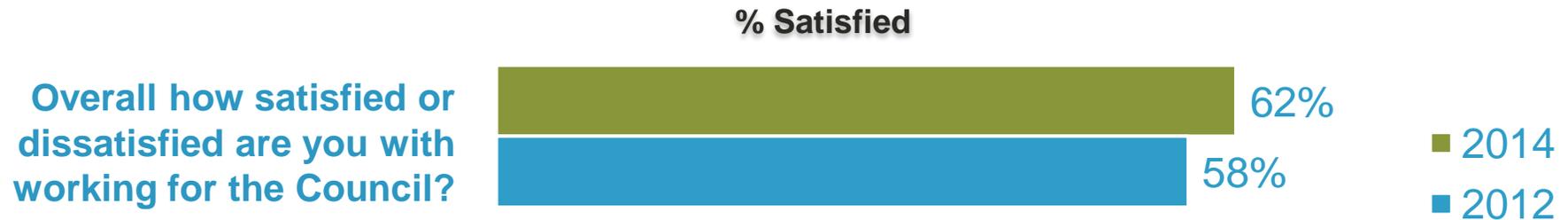
- Methods and response rates
- Key findings
- Overall attitudes towards working for the Council
- Leadership and visibility of senior management
- Change management
- Line managers and managing performance
- Areas for improvement

- 6th wave of survey conducted by Ipsos MORI since 2000
- All employees invited to participate - online or paper questionnaire
- Fieldwork: 28 April – 13 June 2014
- 7,336 employees participated
- Response rate of 39%, up from 36% in 2012 and 35% in 2009
- Children and Families response of 37% - up from 24% in 2012

Service Area	Response Rate
Economic Development	91%
Corporate Governance	62%
Services for Communities	39%
Health & Social Care	39%
Children & Families	37% ←

Source: Ipsos MORI

- Overall a **positive picture**: upward trend across almost all measures



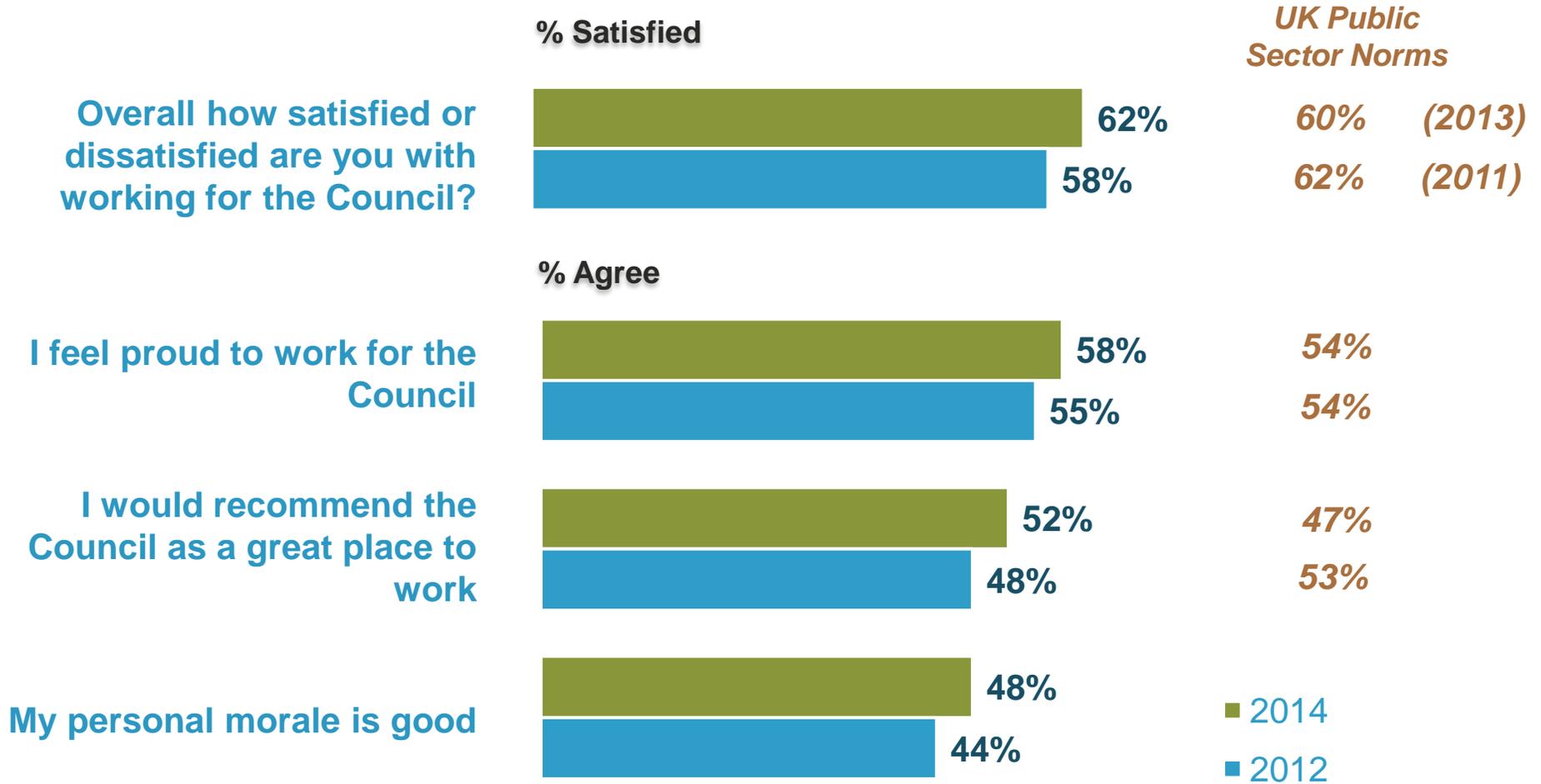
- Biggest improvements in line managers/supervisors being approachable, available and listening - one of the areas you focused on following the last survey
- But... workload and work-life balance heading the wrong way (a key driver of job satisfaction)

Overall Attitudes Towards Working for the Council

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An upward trend across all overall measures

How far do you agree or disagree with each of the following statements?

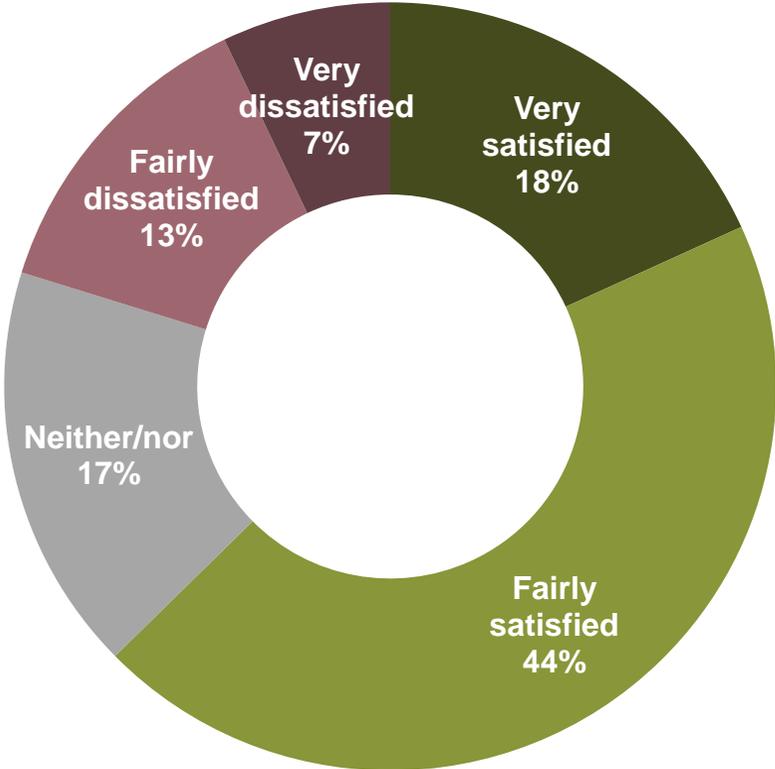


Base: All respondents 2014 (7336) 2012 (6710)

Source: Ipsos MORI

Job satisfaction

Overall how satisfied or dissatisfied are you with working for the Council?

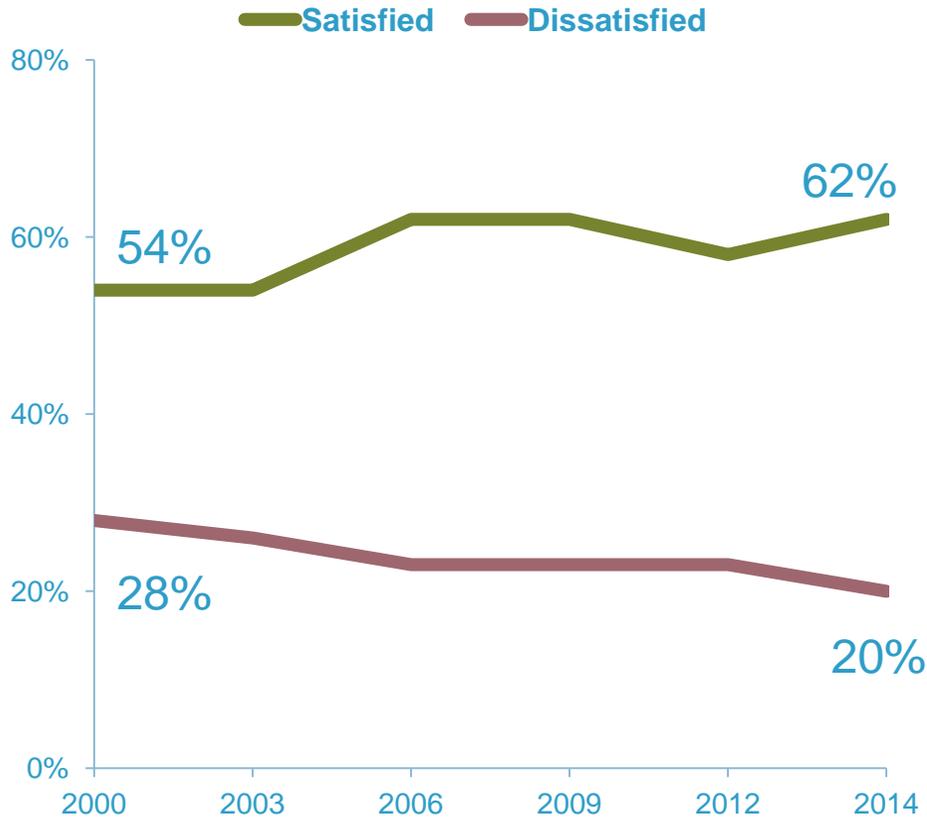


Base: All respondents 2014 (7336)

Source: Ipsos MORI

Job satisfaction

Overall how satisfied or dissatisfied are you with working for the Council?

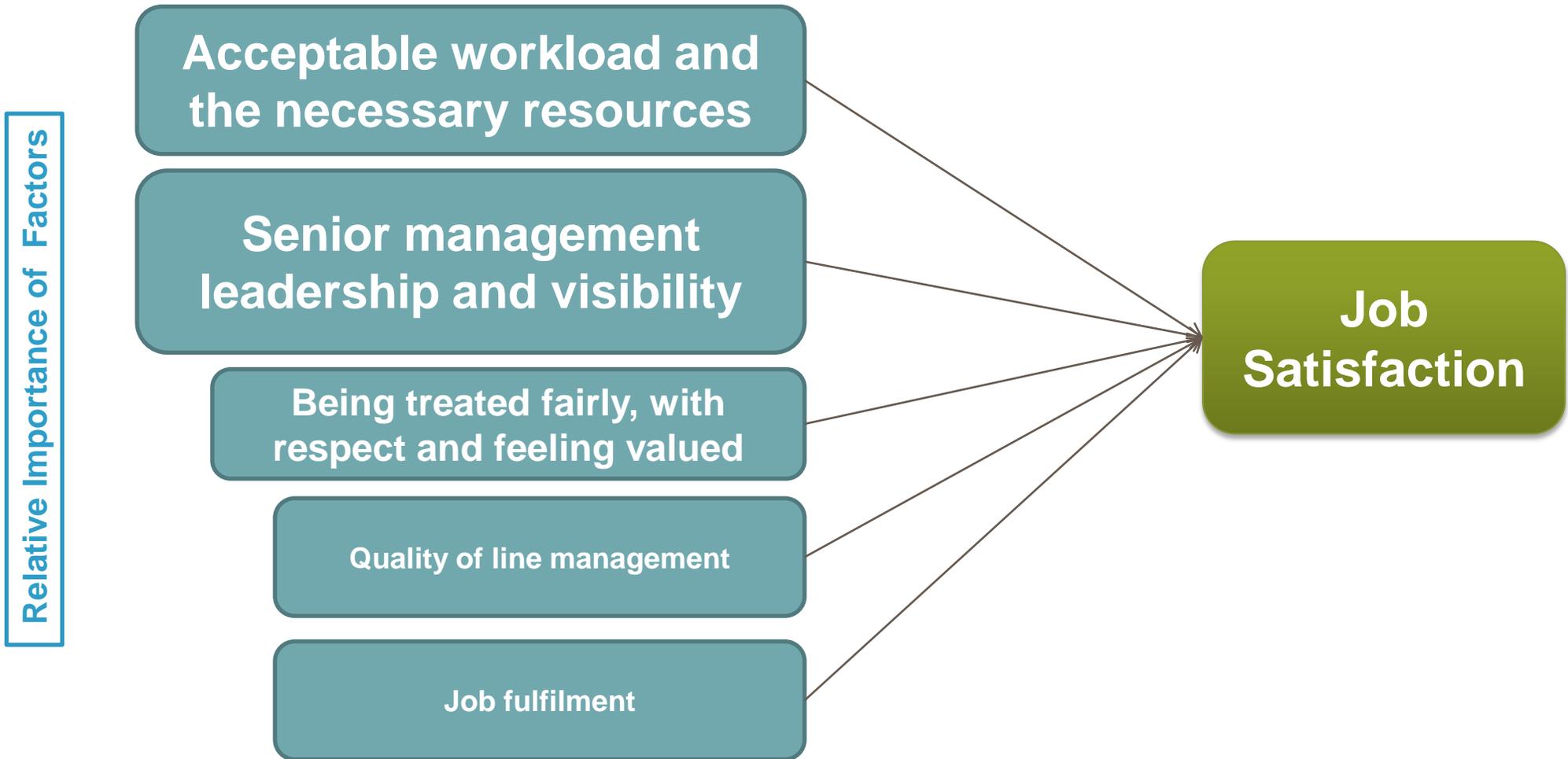


	CEC Employee Survey	UK Public Sector Norms
2014 (CEC) 2013 (UK)	62%	60%
2012 (CEC) 2011 (UK)	58%	62%
2009	62%	61%
2006	62%	61%

Base: All respondents 2014 (7336)

Source: Ipsos MORI

Key Drivers of Job Satisfaction

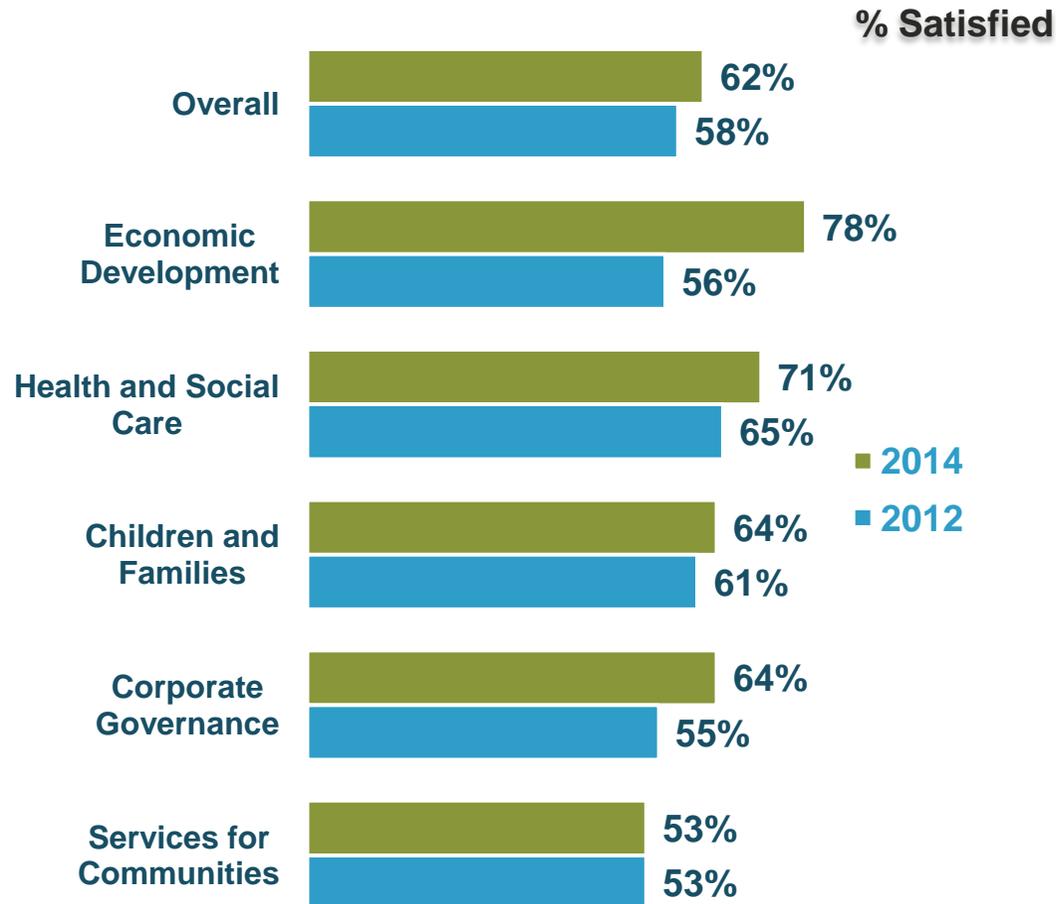


Base: All respondents 2014 (7336) 2012 (6710)

Source: Ipsos MORI

Differences between Service Areas

Overall how satisfied or dissatisfied are you with working for the Council?



Base: All respondents 2014 (7336) 2012 (6710)

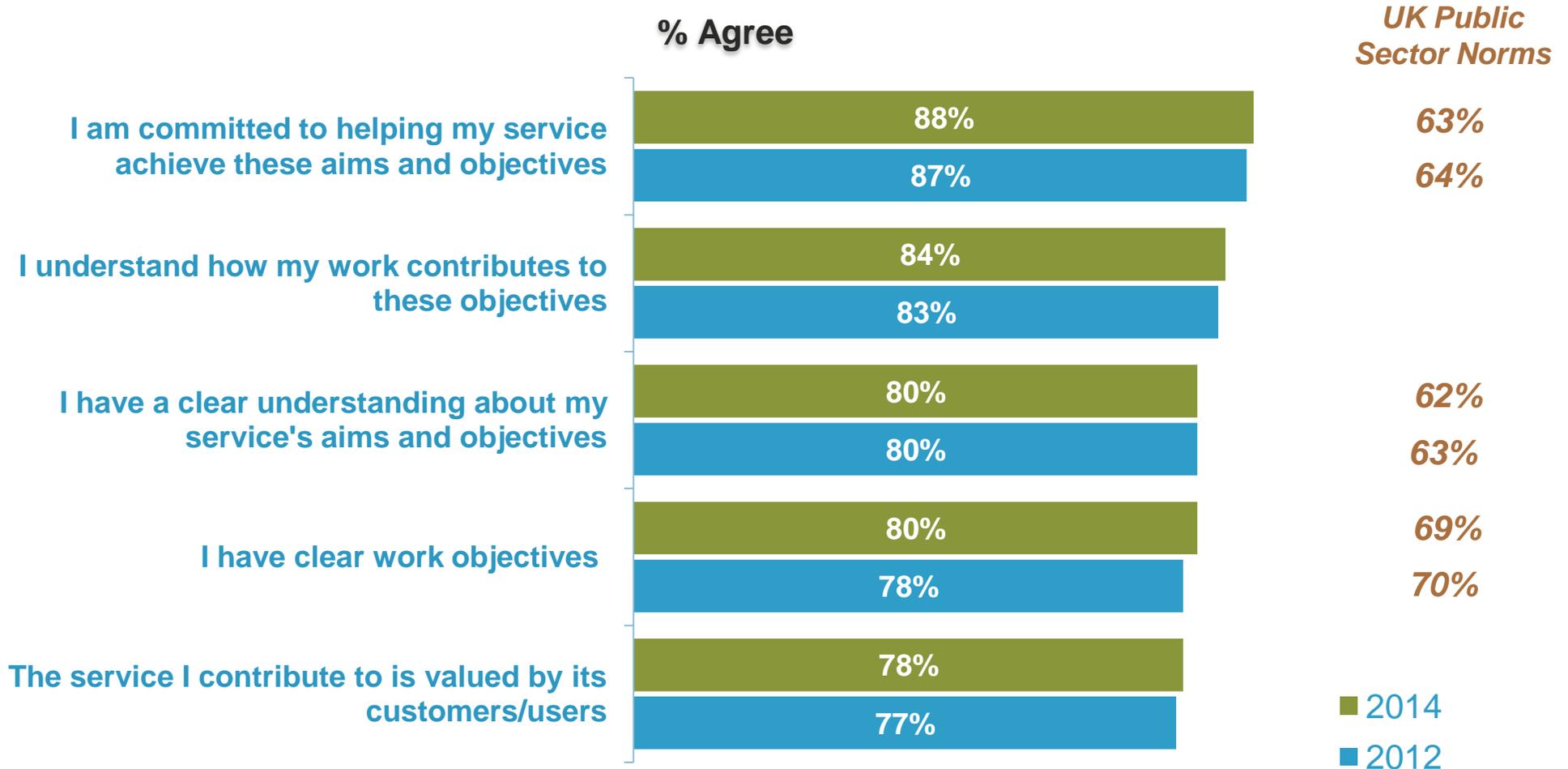
Source: Ipsos MORI

Leadership and Visibility of Senior Management

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Maintaining very positive views on Service Area objectives

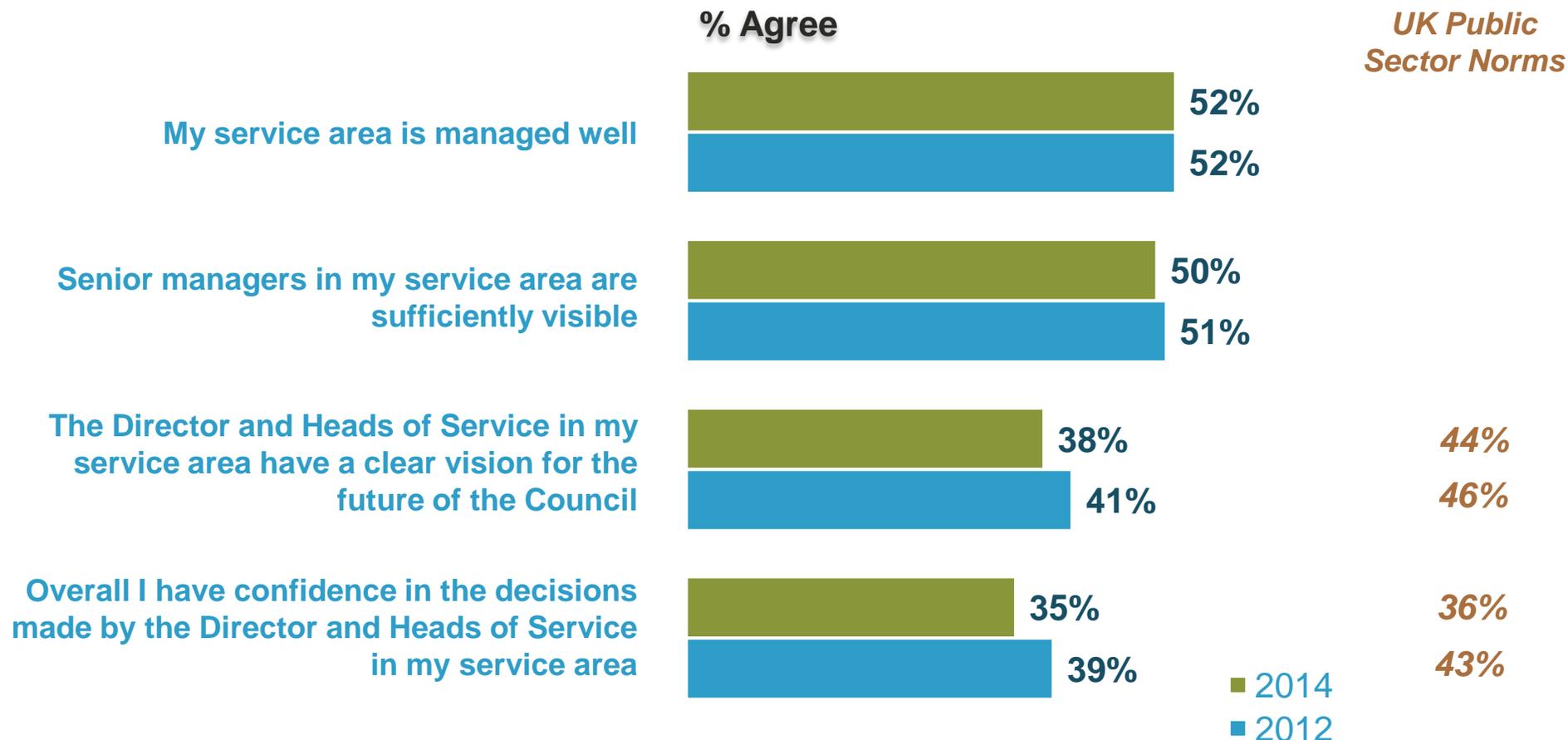
How far do you agree or disagree with each of the following statements?



Base: All respondents: 2014 (7,336); 2012 (6,710)

Leadership and visibility: no real change

How far do you agree or disagree with each of the following statements?

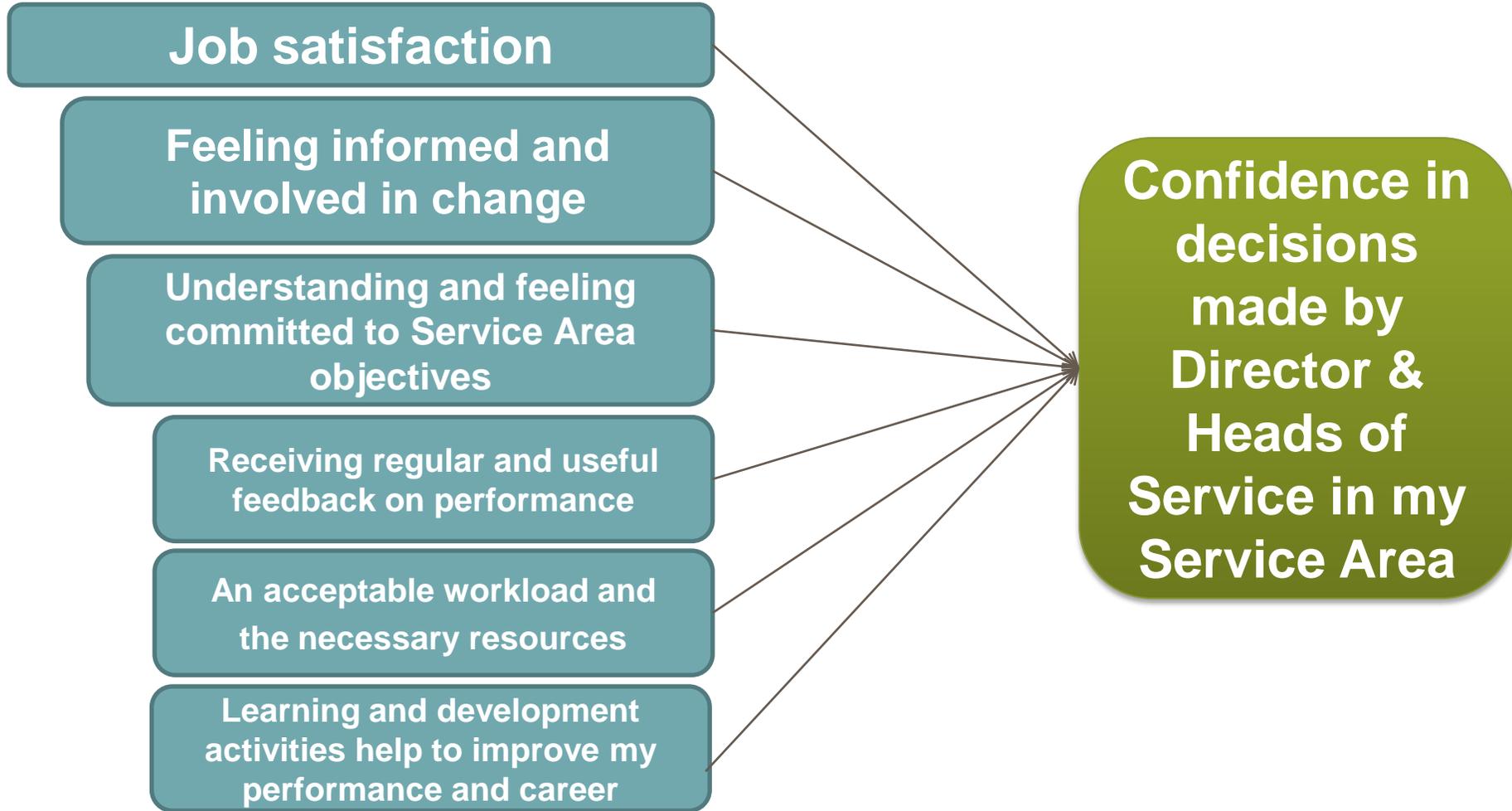


Wording used for "Director and Heads of Service" in 2012 survey was "senior management team", so not directly comparable.

Confidence in senior management is driven by job satisfaction and effective change management

Key Drivers of Confidence in Senior Management

Relative Importance of Factors for Employees



Base: All respondents 2014 (7336)

Source: Ipsos MORI

What would you like the Council to change to make it a great place to work?

There appears to be a lack of communication between senior managers and staff, not about the large issues as they are cascaded through the mail, more about day to day matters which can impact on performance and the way tasks are carried out.

Engage with staff at ground level in their own working environment ensure Senior Managers recognise peoples' experience and expertise and channel these for the benefit of the Council.

Management needs to start making it more apparent that they believe staff under them are doing a good job in very difficult circumstances. This should not just be done by sending out generic e-mails but should be done more personally, wherever possible.

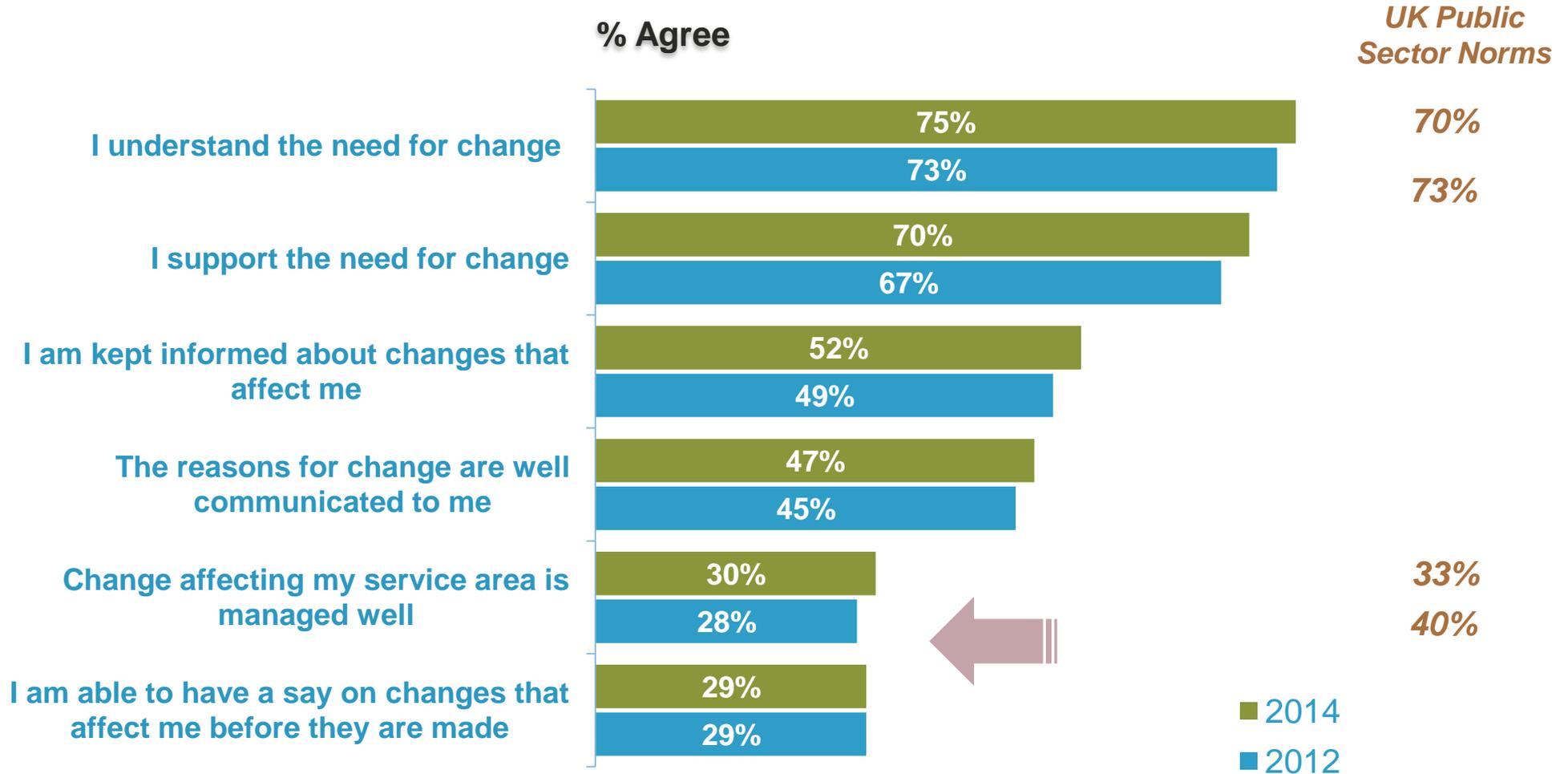
Source: Ipsos MORI

Change Management

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Understanding and support for change - but less than a third feel it is managed well and they have a say

How far do you agree or disagree with each of the following statements?



Base: All respondents: 2014 (7,336); 2012 (6,710)

What would you like the Council to change to make it a great place to work?

I would like the council to take more notice of the front line staff and their expertise in the work that they do and consult more on any changes that are going to be made.

Source: Ipsos MORI

Line Managers and Managing Performance

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Marked improvement in attitudes towards line managers and supervisors

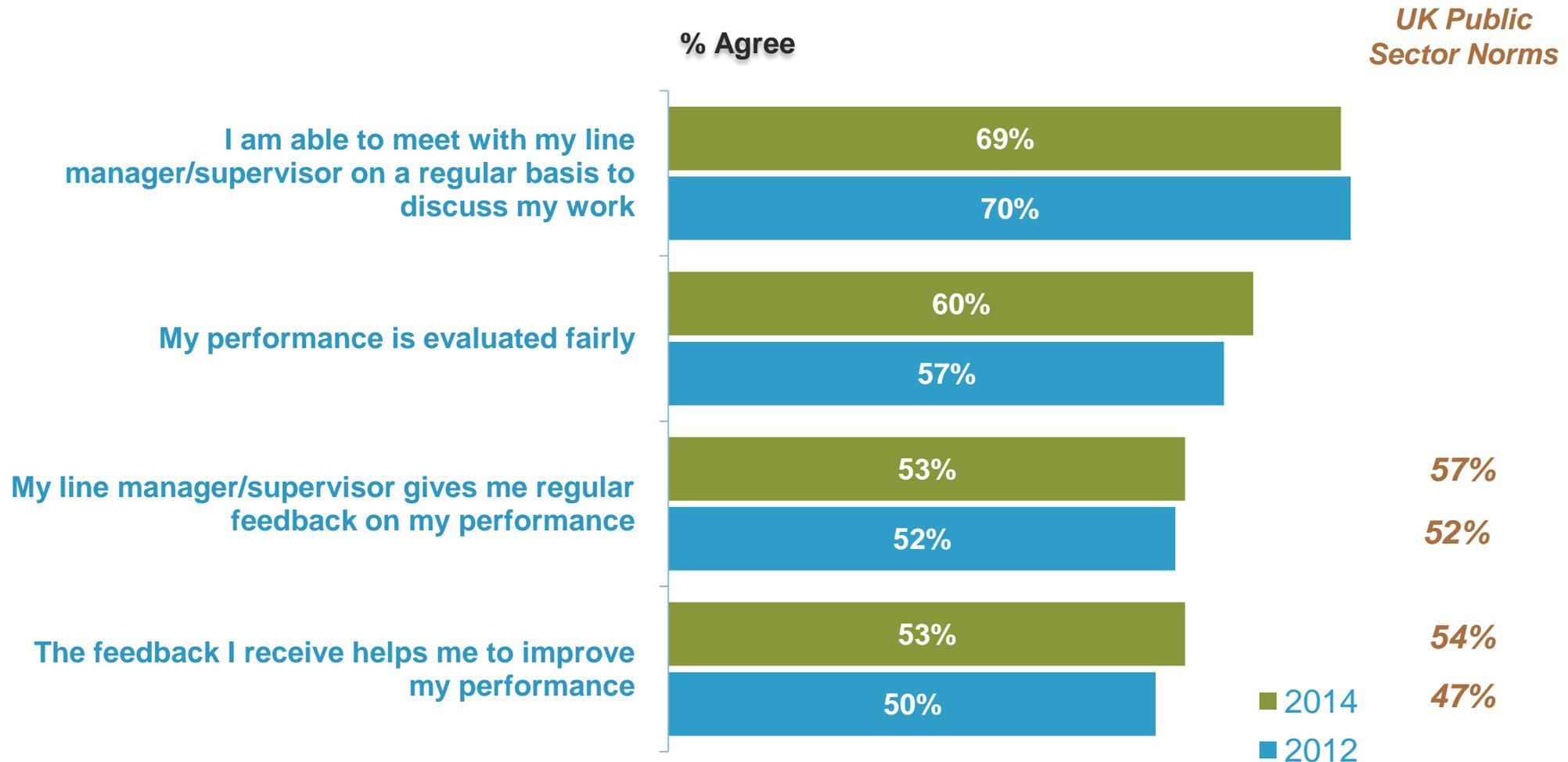
How far do you agree or disagree with each of the following statements? My line manager/supervisor...



Base: All respondents: 2014 (7,336); 2012 (6,710)

Feedback: still room for improvement

How far do you agree or disagree with each of the following statements? My line manager/supervisor...



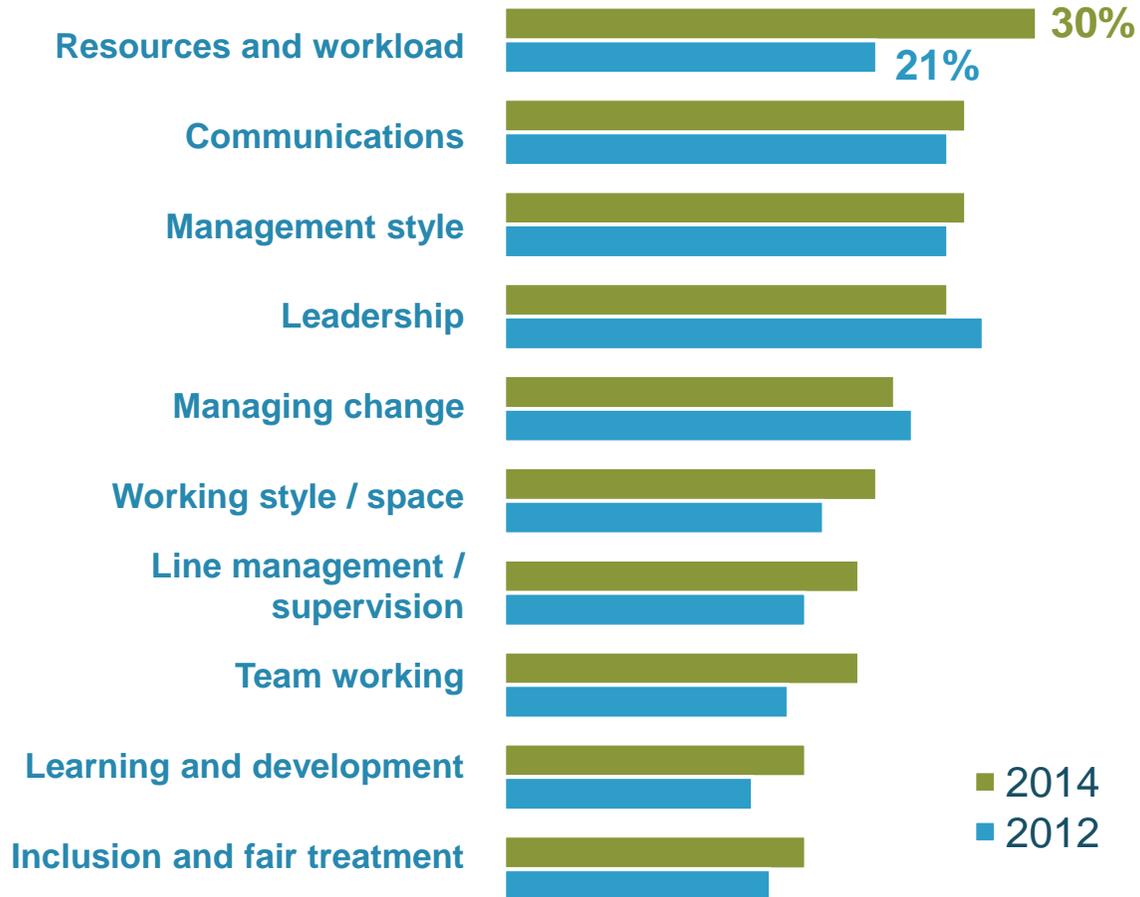
Base: All respondents: 2014 (7,336); 2012 (6,710)

Areas for Improvement

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“Resources and workload” now the most mentioned area for change in 2014

What would you like the Council to change to make it a great place to work?

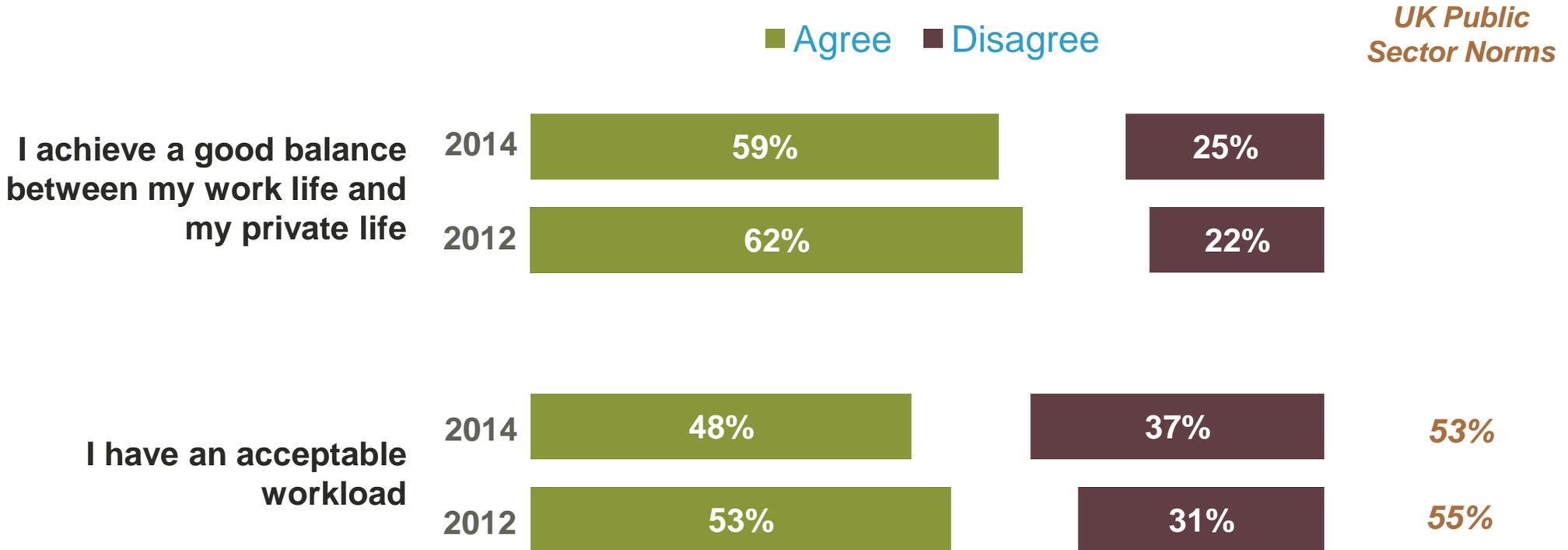


More staff! Alternatively a more realistic approach needs to be taken by team leaders and managers as to what work we can take on with fewer staff.

Line managers are aware of things they should be doing, but workloads are so heavy that enough time cannot always be dedicated [...] despite good intentions.

Workload and work-life balance

How far do you agree or disagree with each of the following statements?



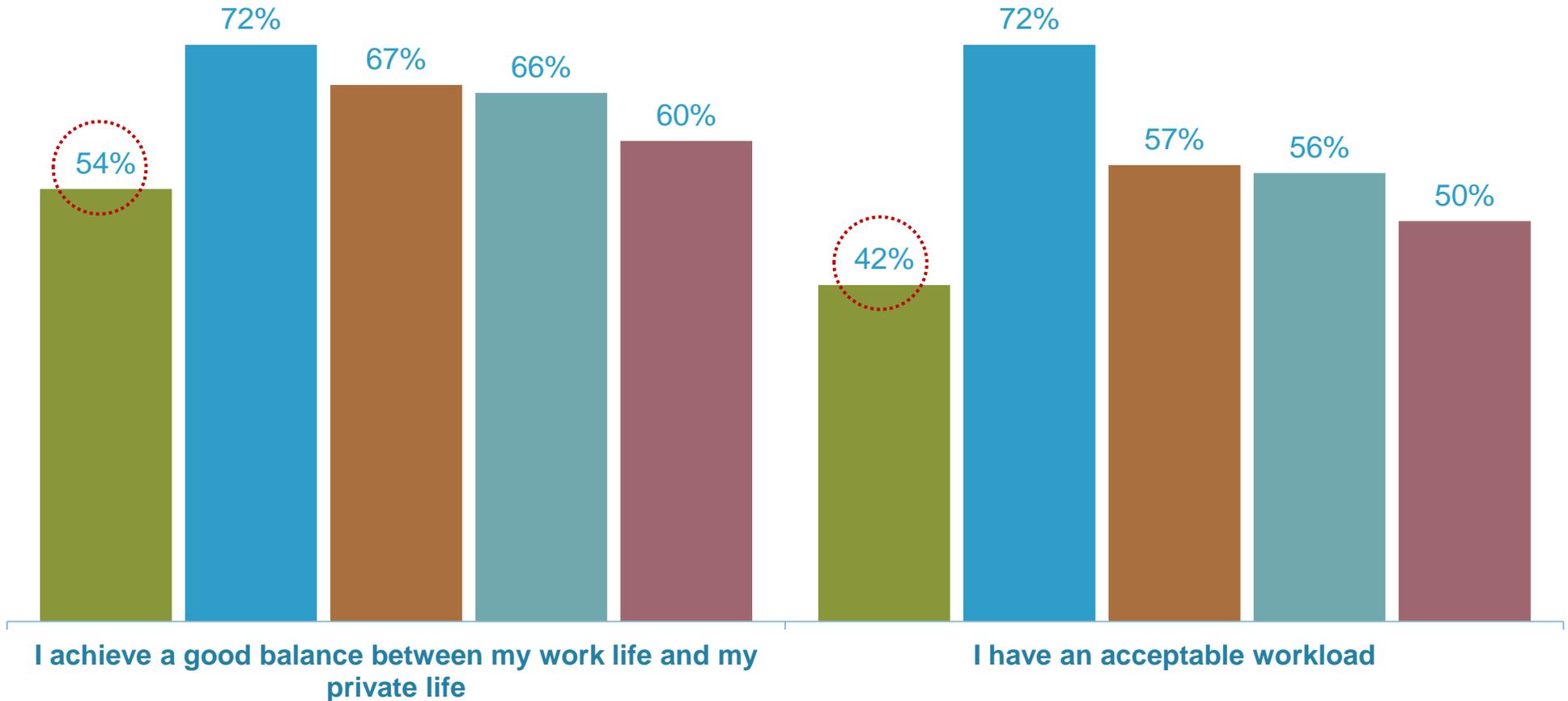
Base: All respondents 2014 (7336) 2012 (6710)

Source: Ipsos MORI

Staff in Children and Families tend to be the most negative about workloads

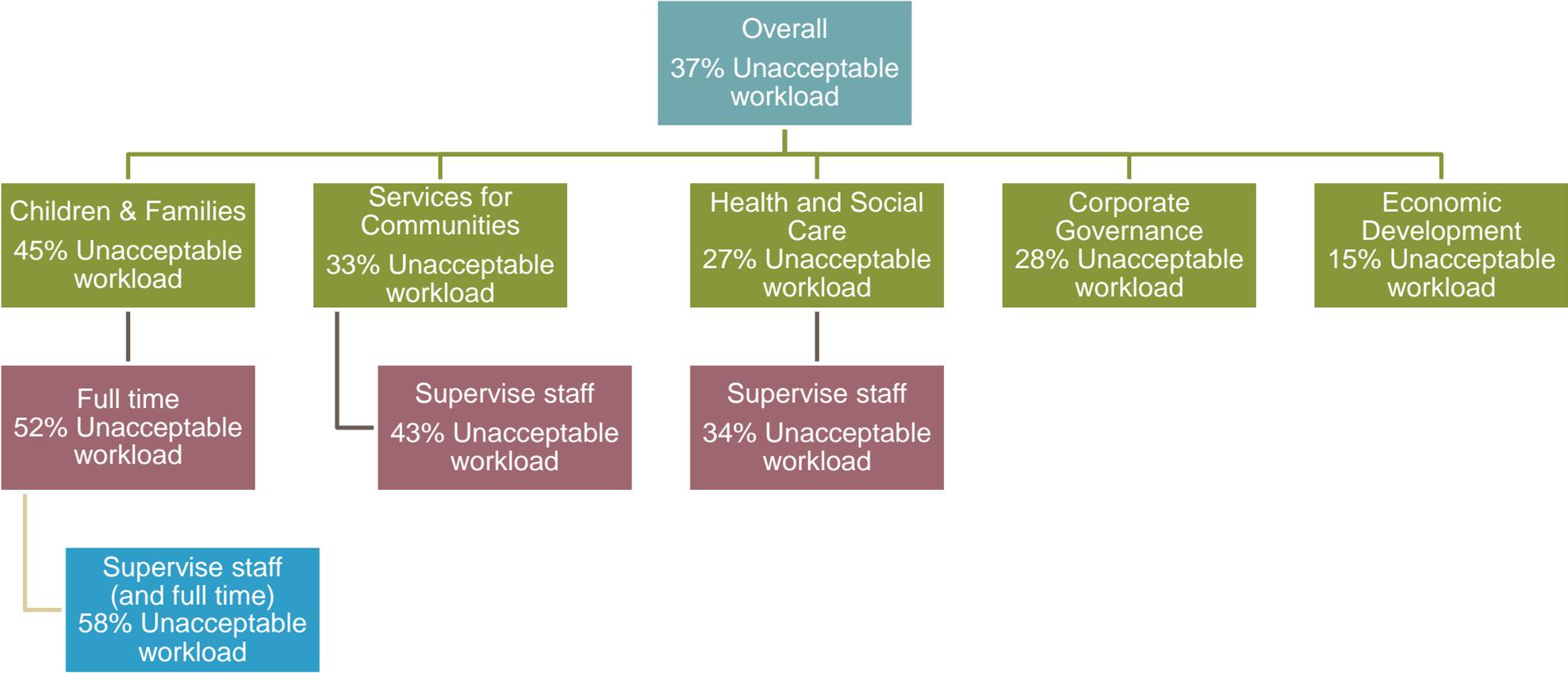
How far do you agree or disagree with each of the following statements?

■ Children & Families ■ Economic Development ■ Corporate Governance ■ Health & Social Care ■ Services for Communities

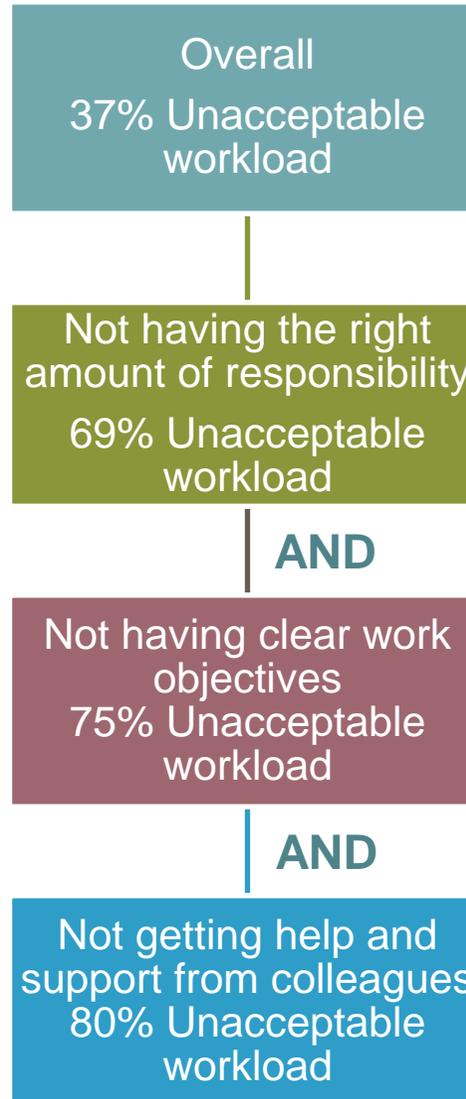


Base: Children & Families (3,339) Economic Development (94) Corporate Governance (811) Health and Social Care (1453) Services for Communities (1745)

Who is more likely to feel they don't have an acceptable workload?



Main factors that combine to influence dissatisfaction with workload

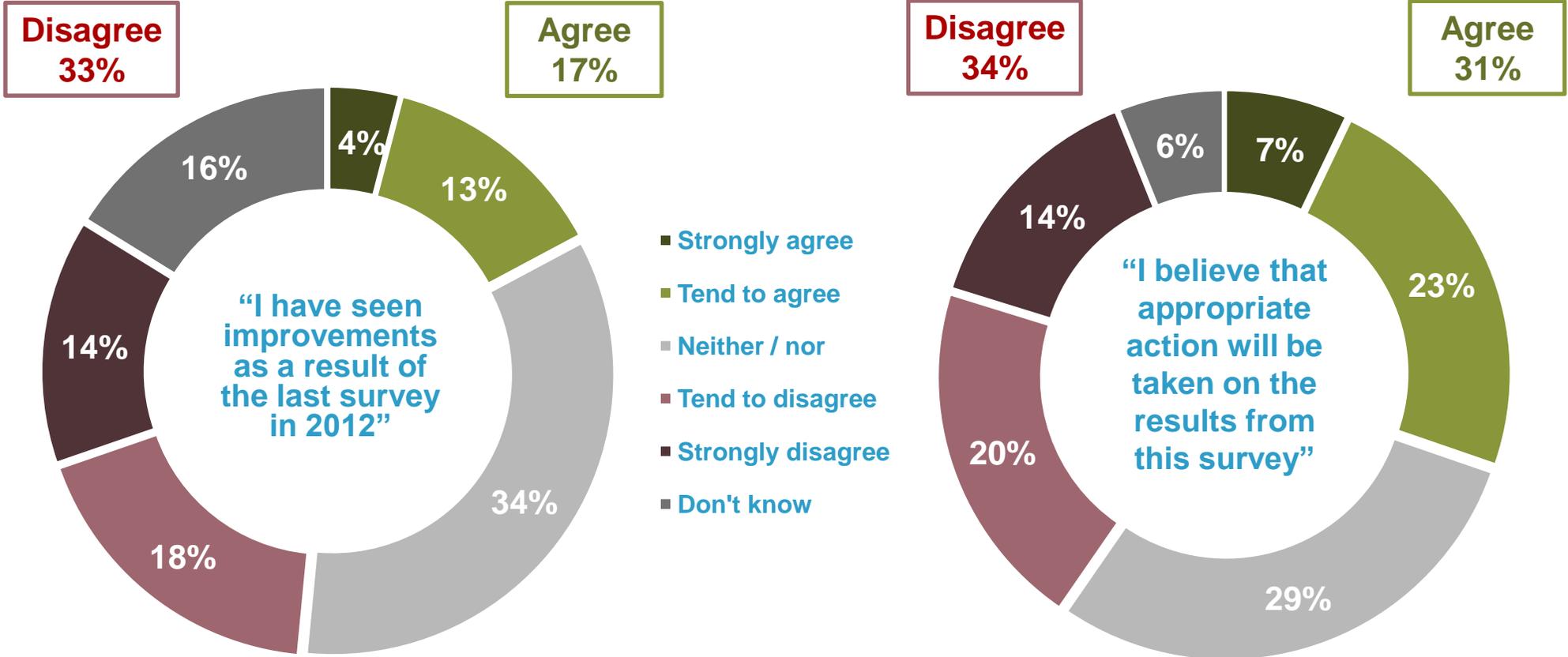


Survey Feedback & Communication

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Around one in three believe appropriate action will be taken on the results from this survey

How far do you agree or disagree with these statements?

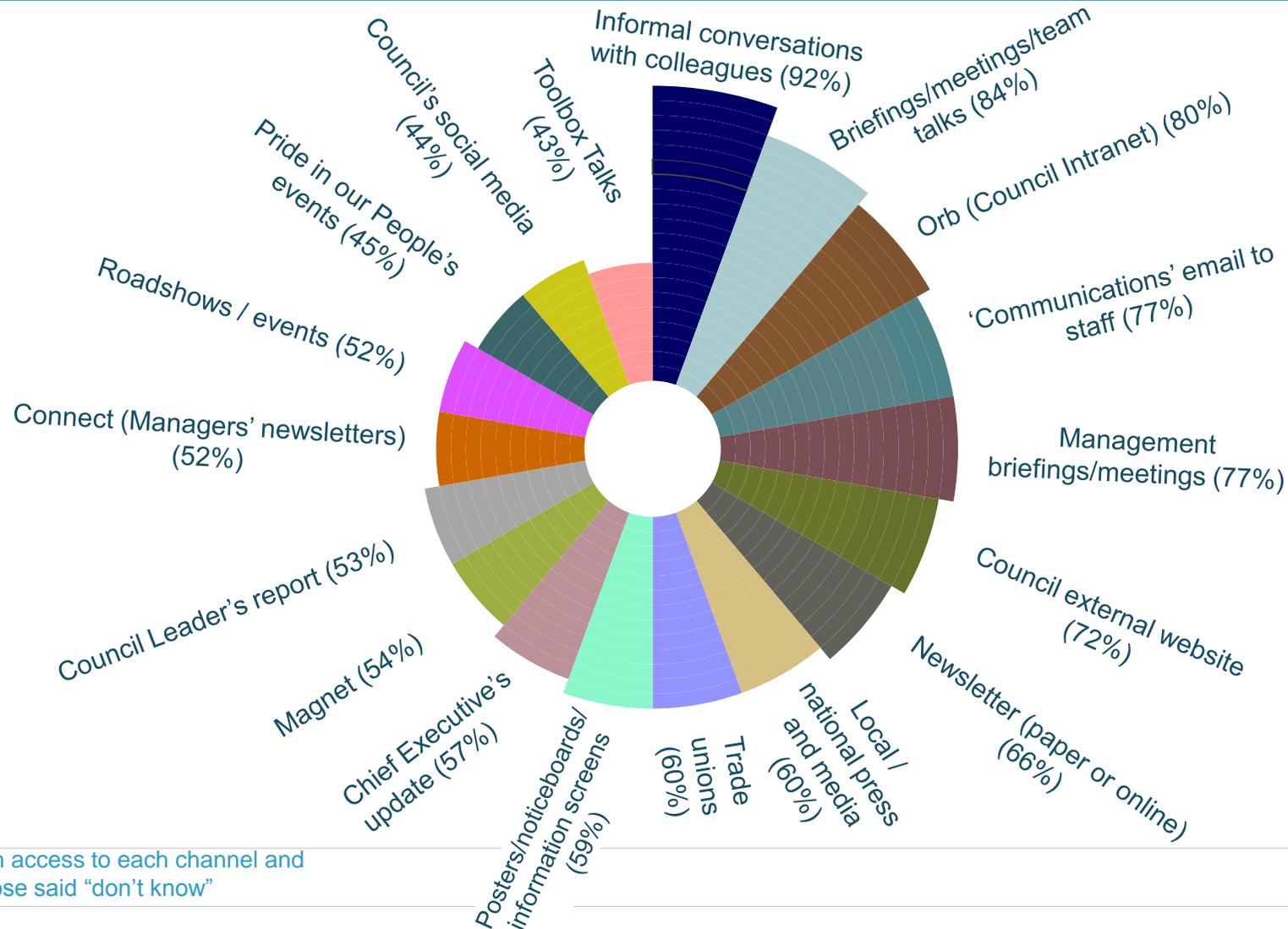


Base: All respondents 2014 (7336)

Source: Ipsos MORI

Employees feel face-to-face communication is the most effective

How useful do you find these channels of information?



Base: All with access to each channel and excluding those said "don't know"

Summary & Recommendations

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Summary and recommendations

- Overall a **positive picture**: upward trend across almost all measures
- Particular improvements in line managers/supervisors being approachable, available and listening

Areas to focus on:

- **Leadership and visibility of senior management** – still an issue and one of the main drivers of job satisfaction. Closely linked with change management.
 - Feeling informed and involved in change – having a say on changes
 - Engaging with staff face-to-face and on the front line
 - Receiving regular and useful feedback on performance
- **Workloads and work-life balance** – the main driver of job satisfaction and heading in the wrong direction (particularly in Children & Families)
 - Distributing work more effectively/fairly
 - Clearer work objectives/priorities
 - Identifying ways to complete tasks more efficiently

As a next step for going forward, The City of Edinburgh Council Business Intelligence Team can provide further analysis and briefings with management teams.

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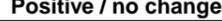
make the difference
shape the change

Thank you

ipek.ozgul@ipsos.com

lorraine.murray@ipsos.com

Service area level
 Significant positive change on 2012
 Significant negative change on 2012

Change on 2012
 Negative
 Positive / no change

Theme	Question	CEC		Children and Families		Corporate Governance		Health and Social Care		Services for Communities		Economic Development	
		Base	Change on 2012	Base	Change on 2012	Base	Change on 2012	Base	Change on 2012	Base	Change on 2012	Base	Change on 2012
	Base	7336		3339		811		1453		1745		94	
My work	Find the work interesting	86	2	91	0	83	6	87	-1	76	0	83	4
	Involved in the decisions that affect my work	52	2	55	-1	55	6	52	2	46	2	67	7
	Make best use of my skills and abilities	67	5	75	3	61	5	69	2	54	1	69	11
	Able to show initiative	79	3	84	0	76	5	81	1	70	1	79	2
	Sufficiently challenged	73	6	79	3	68	7	76	5	59	1	70	18
	Sense of personal accomplishment	73	4	81	1	66	6	77	1	60	1	71	9
	Able to have a say about the way I work	63	3	65	-2	64	6	63	2	54	1	71	3
My colleagues	Get the help and support I need from colleagues	81	6	84	6	81	5	83	4	74	4	85	8
	Are encouraged to come up with new and better ways of doing things	64	3	69	0	64	4	64	4	54	0	70	12
	Work together to find new ways to improve the service we provide	70	6	76	4	68	9	71	6	58	1	73	13
My line manager	Is approachable and available	76	6	75	3	77	7	79	6	73	5	72	4
	Listens to and is open to my ideas/suggestions	71	8	71	3	73	10	74	9	66	9	74	6
	Recognises when I have done my job well	65	4	65	1	68	5	68	6	62	5	74	11
	Motivates me to achieve my full potential in my work	56	5	58	2	56	11	61	6	49	4	62	11
	Is open and honest	71	4	71	2	74	8	75	4	66	2	70	6
	Delegates responsibility effectively	58	2	59	0	59	8	63	1	52	2	60	12
	Celebrates team success	55	4	58	1	58	6	55	5	47	0	64	13
Managing performance	Able to meet with my line manager on a regular basis to discuss my work	69	-1	66	-3	70	1	76	1	68	-1	77	-2
	My line manager/supervisor gives me regular feedback on my performance	53	1	51	0	55	4	62	4	49	0	61	3
	The feedback I receive helps me to improve my performance	53	3	53	1	54	6	60	2	47	1	57	8
	My performance is evaluated fairly	60	3	60	0	62	4	66	6	54	0	71	11
	Received a Performance/Professional Review and Development (PRD) within the past 12 months?	71	-1	68	-3	73	-13	78	10	67	-5	86	8
Resources and workload	Have clear work objectives	80	2	84	2	77	1	82	1	70	-4	85	10
	Get the information I need to do my job well	66	1	69	-1	66	2	65	-2	59	-1	74	11
	Have an acceptable workload	48	-5	42	-6	57	0	56	-2	50	-3	72	19
	Have the right amount of responsibility	64	4	66	2	65	7	67	3	57	1	70	17
	Have the skills I need to do my job effectively	90	2	92	1	87	3	90	0	86	-1	93	4
	Have the tools I need to do my job effectively	63	0	62	0	62	0	68	-1	58	-3	73	13
	Achieve a good balance between my work life and my private life	59	-3	54	-5	67	0	66	-1	60	1	72	1
Change in my service area	The reasons for change are well communicated to me	47	2	48	1	58	11	50	-1	39	-1	49	9
	Kept informed about changes that affect me	52	3	54	0	61	12	52	-2	44	2	52	11
	Understand the need for change	75	2	75	3	86	5	77	1	71	1	79	6
	Support the need for change	70	3	68	3	83	4	72	4	66	3	81	10
	Able to have a say on changes that affect me before they are made	29	0	30	-2	34	7	31	-2	25	2	37	10
	Change affecting my service area is managed well	30	2	29	-1	37	12	36	1	24	3	35	8
Taking action	Appropriate action will be taken on the results from this survey	31	9	29	8	40	16	36	8	25	6	39	13
	Improvements have been made as a result of the last survey in 2012	17	2	13	-1	28	10	23	3	14	2	22	3
Learning and development	Learning and development needs are agreed at my PRD meetings, One-to-Ones	68	1	71	1	64	-8	76	2	57	-4	71	12
	Able to access the right learning and development opportunities when I need to	58	3	64	4	53	-2	64	3	46	-2	55	8
	L+D activities completed in the past 12 months have helped to improve my performance	60	5	70	6	45	-2	67	1	42	-3	52	4
	L+D activities completed while working for the Council will help me to develop my career	58	5	63	7	51	6	67	2	45	0	60	11
	Given support to allow me to meet my learning and development needs	56	3	62	3	49	0	64	3	43	-1	60	19
The induction I received when I started my present job helped me to do my work effectively	51	12	52	26	53	35	60	32	45	24	35	6	
Objectives and purpose	Clear understanding about my service's aims and objectives	80	0	84	-1	79	4	87	3	70	-4	86	8
	Committed to helping my service achieve these aims and objectives	88	1	90	-1	87	1	92	2	81	-3	91	9
	Understand how my work contributes to these objectives	84	1	87	-1	79	-1	90	2	74	-4	82	4
	The service I contribute to is valued by its customers/users	78	1	80	1	72	0	87	-1	69	-1	83	6

Service area level
 Significant positive change on 2012
 Significant negative change on 2012
Change on 2012
Negative
Positive / no change

Theme	Question	CEC		Children and Families		Corporate Governance		Health and Social Care		Services for Communities		Economic Development	
		Base	Change on 2012	Base	Change on 2012	Base	Change on 2012	Base	Change on 2012	Base	Change on 2012	Base	Change on 2012
		7336		3339		811		1453		1745		94	
Leadership	My service area is managed well	52	0	52	-3	56	11	59	-1	45	-1	67	12
	Senior managers in my service area are sufficiently visible	50	-1	47	-7	62	8	57	4	45	0	67	-1
	The Director and Heads of Service in my service area have a clear vision for the future of the Council	38	-3	37	-9	56	17	43	-2	28	-7	67	12
	Have confidence in the decisions made by the Director and Heads of Service in my service area	35	-4	34	-12	45	10	40	-2	27	-3	66	25
Working for the Council	Feel proud to work for the Council	58	3	56	3	60	6	68	6	54	-1	70	21
	Would recommend the Council as a great place to work	48	4	44	2	51	10	61	9	43	1	64	17
	The Council is a better place to work than a year ago	17	2	13	-1	24	7	26	6	15	2	21	0
	My personal morale is good	52	4	55	1	50	9	59	5	44	3	63	14
	Satisfied with working for the Council	62	4	64	3	64	9	71	6	53	0	78	22
Fairness and respect	Treated fairly at work	76	2	80	0	76	5	78	1	68	1	81	13
	Treated with respect by the people I work with	83	2	86	1	80	0	83	-1	77	1	85	7
	Feel valued for the work I do	62	3	67	-1	58	5	66	2	52	2	69	3
	The Council respects individual differences (e.g. cultures, working styles, backgrounds)	69	3	71	3	72	3	72	1	62	2	77	3
Communications (find useful)	Magnet (online or printed)	40	0	34	-2	52	-1	48	7	40	0	43	5
	Orb	67	-2	66	-3	79	-7	60	1	68	-1	80	12
	Council external website	50	-7	49	-8	59	-9	47	-1	50	-8	63	1
	'Communications' email to staff	65	4	63	1	80	-3	60	15	65	3	81	11
	Connect (managers' newsletter)	25	-	21	-	35	-	32	-	25	-	20	-
	Pride in our People events	23	-	18	-	33	-	29	-	24	-	32	-
	Briefings/meetings/team talks	70	-	69	-	80	-	70	-	67	-	77	-
	Management briefings/meetings	55	7	54	3	64	12	52	5	55	8	54	10
	Chief Executive's brief	45	10	41	9	63	12	42	13	47	11	73	15
	Local/national press and media	45	0	46	3	50	-4	42	0	41	-3	59	-5
	Trade Unions	38	-6	46	-5	22	-15	40	-10	31	-5	26	7
	Council Leader's report	40	7	37	3	56	15	37	7	41	8	64	11
	Informal conversations with work colleagues	85	2	87	0	88	1	84	3	79	-1	90	6
	Posters/noticeboards/Information screens	43	-3	41	-10	45	3	49	1	40	-3	49	12
	Roadshows/Events	26	-3	22	-8	35	1	26	-2	27	0	31	2
	Newsletters (paper or electronic)	49	1	47	-3	57	7	55	4	44	0	56	0
Toolbox talks	12	-1	9	-2	13	4	12	0	20	1	6	-10	
Council's own social media channels (e.g. YouTube, Twitter, Facebook)	17	3	16	3	22	8	14	3	20	3	30	4	

Corporate Policy and Strategy Committee

10.00, Tuesday, 30 September 2014

Learning in Partnership: Policy for Student Placements in Health and Social Care and Children and Families

Item number 7.6
Report number
Executive/routine
Wards

Executive summary

The purpose of the proposed policy is to support the education and development of the future workforce across Children and Families and Health and Social Care. The Council is committed to doing this in partnership with providers of education, training and learning.

Supporting students effectively promotes high standards of workforce development and of service delivery.

The policy will support all stakeholders involved in the facilitation of student learning and development.

The information provided will assure quality and provide a consistent approach across the Council.

Links

Coalition pledges P1

Council outcomes CO1 -
CO6, CO10 - 15

Single Outcome Agreement SO2 – SO3 – SO4

Report

Learning in Partnership: Policy for Student Placements in Health and Social Care and Children and Families

Recommendations

- 1.1 It is recommended that the Corporate Policy and Strategy Committee adopt the policy statement attached at Appendix 1: Learning in Partnership: Policy for Student Placements in Health and Social Care and Children and Families.

Background

- 2.1 Previously, both service areas had a separate policy. A joint policy, covering all students will ensure a consistent approach to how students are supported in the Council.
- 2.2 It is important for the Council to be clear about the expectation on students prior to their joining the organisation. This includes being specific about membership of the Protection of Vulnerable Groups Scheme.

Main report

- 3.1 The policy statement at Appendix 1 articulates the principles that will apply to the Council's engagement with students, and with the education and training organisations, with which we work in partnership. These principles include our commitment:
 - a. to supporting the learning and development of students, which helps the Council fulfil its role as a learning organisation
 - b. that the needs of children, young people, adults and families will always be paramount when considering student placements
 - c. to the importance of students participating in work-based placements, and to working with all further and higher education institutions to support the learning and development of a future workforce
 - d. the principle that involvement in student education is beneficial to staff, service users and the Council, and that supporting student placements requires the participation of all agencies and the engagement of staff

- e. that no student should begin a placement or have unsupervised contact with service users until the Protection of Vulnerable Groups process has been completed.

Measures of success

- 4.1 Effective collaboration between Children and Families, Health and Social Care, universities and colleges will support the education and training of the future workforce. This will impact positively on the quality of the services provided, the consistency of approaches and the outcomes for people.
- 4.2 Adherence with the requirements of the Protection of Vulnerable Groups (Scotland) Act 2007 will support safer recruitment and the protection service users, staff and the public.

Financial Impact

- 5.1 There is no financial impact to the Council from the implementation of this policy.

Risk, policy, compliance and governance impact

- 6.1 The policy meets the Council's requirement, describing agreed courses of action or sets of standards workforce learning and development.
- 6.2 The policy is consistent with the expectations of the Role of Chief Social Work Officer – within the Principles, Requirements and Guidance pursuant to Section 5 (1) of the Social Work Scotland Act 1968.

Equalities impact

- 7.1 The new [Equality Act](#) came into force on 1 October 2010, bringing together over 116 pieces of legislation into one Act. The new Act provides the legal framework to protect the rights of individuals and advance equality of opportunity for all. The assessment carried out in respect of this policy demonstrates only positive impacts.

Sustainability impact

- 8.1 A consistent policy for students will support succession planning and will assist in the development of the workforce for the longer term.

Consultation and engagement

- 9.1 The following represent the consultation activity that has taken place in the development of this policy:
- a. the policy was produced by a working group of learning and development professionals from both Children and Families and Health and Social Care
 - b. an early consultation meeting was held with programme directors from a local university to seek views on policy content
 - c. consultation with senior managers has taken place at key stages of the policy development
 - d. consultation and advice have been sought from Legal Services, particularly in relation to the arrangements for Protection of Vulnerable Groups
 - e. there has been consultation on the policy with local professional associations: Unison and EIS.

Background reading/external references

LEGISLATIVE CONTEXT

The Role of Chief Social Work Officer – within the Principles, Requirements and Guidance pursuant to Section 5 (1) of the Social Work Scotland Act 1968.

The new [Equality Act](#) came into force on 1 October 2010, bringing together over 116 separate pieces of legislation into one single Act. Combined, they make up a new Act that will provide a legal framework to protect the rights of individuals and advance equality of opportunity for all.

Protection of Vulnerable Groups (Scotland) Act 2007.

ASSOCIATED DOCUMENTS

- [Learning Organization](#)
- [Scottish Social Services Council – code of practice](#)
- [General Teaching Council for Scotland – Code of Professionalism and Conduct](#)
- [College of Occupational therapists - Ethics and Professional Standards](#)
- [Nursing and Midwifery Council - The code: Standards of Conduct, Performance and Ethics](#)
- [Information about Equal Opportunities](#)
- [Adult Child Protection Statement](#)
- [Contact Details for Placement Requests](#)

- [Complaints Policy and Procedure](#)
- [CPD Opportunities](#)
- [Dress Code Guidance](#)
- [Establishment Student Policy Exemplar](#)
- [Enhancing the Quality of AHP Practice Education](#)
- [Guidance on Safe Recruitment of School Volunteers](#)
- [Learning in Partnership: Policy for Student Placements Health and Safety responsibilities](#)
- [Learning in Partnership: Policy for Student Placements Health and Safety Emergency Contact List](#)
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- [Student Accessing Courses](#)
- [Student Induction Checklist](#)
- [Student Placement Evaluation](#)
- [Student placement dates for nursery, primary, secondary and social work](#)
- [Student Supervision Record](#)

Peter Gabbitas Director Health and Social Care

Gillian Tee Director Children and Families

Contact: John Kerr Learning and Development Advisor, Workforce Planning and Development
 Caroline Bayne Principal Officer Teacher Professional Development and Leadership

E-mail: john.kerr@edinburgh.gov.uk 0131 529 6479

caroline.bayne@edinburgh.gov.uk 0131 469 3980

Links

Coalition pledges	P1 – Increase support for vulnerable children, including help for families so that fewer go into care
Council outcomes	CO1 – Our children have the best start in life, are able to make and sustain relationships and are ready to succeed CO2 – Our children and young people are successful learners,

confident individuals and responsible citizens making a positive contribution to their communities

CO3 – Our children and young people in need, or with a disability, have improved life chances

CO4 – Our children and young people are physically and emotionally healthy

CO5 – Our children and young people are safe from harm or fear of harm, and do not harm others within their communities

CO6 – Our children's and young people's outcomes are not undermined by poverty and inequality

CO10 – Improved health and reduced inequalities

CO11 – Preventative and personalised support in place

CO12 – Edinburgh's carers are supported

CO13 – People are supported to live at home

CO14 – Communities have the capacity to help support people

CO15 – The public is protected

Single Outcome Agreement

SO2 - Edinburgh's citizens experience improved health and wellbeing, with reduced inequalities in health

SO3 – Edinburgh's children and young people enjoy their childhood and fulfil their potential

SO4 – Edinburgh's communities are safer and have improved physical and social fabric

Appendices

The Student Placement Policy

Policy for Student Placements in Health and Social Care and Children and Families

Implementation date: 10 May 2011

Control schedule

Approved by	<i>(relevant committee)</i>
Approval date	<i>(date committee approval given)</i>
Senior Responsible Officer	
Author	Caroline Bayne, Principal Officer – Teaching; John Kerr, Learning and Development Advisor
Scheduled for review	<i>(one year from above date)</i>

Version control

Version	Date	Author	Comment
0.1	<i>(date required)</i>	Caroline Bayne; John Kerr	

Committee decisions affecting this policy

Date	Committee	Link to report	Link to minute
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Policy for Student Placements in Health and Social Care and Children and Families

Policy statement

- 1.1 The City of Edinburgh Children and Families and Health and Social Care Departments are committed to working in partnership with providers to support the education and development of the future workforce.

Many students are supported successfully within our agency and we wish to maintain these high standards.

The policy and set of procedures provided will support all stakeholders involved in the facilitation of student learning and development.

The information provided will assure quality and provide a consistent approach across Children and Families and Health and Social Care.

Scope

- 2.1 The policy supports staff hosting students within all establishments or agencies. It outlines responsibilities for each stakeholder involved in the student placement process (section 5) and the key expectations in relation to the allocation, support and criminal records checking of students within the workplace, through the Protection of Vulnerable Groups scheme (PVG).

Definitions

- 3.1 n/a

Policy content

- 4.1 Our commitment to supporting the learning and development of students helps us to fulfil our role as a learning organisation.
- 4.2 The needs of all children, young people, adults and families will always be paramount when considering student placements.

- 4.3 The Children and Families and Health and Social Care Departments attach high importance to participating in the promotion of work-based placements.
- 4.4 The Children and Families and Health and Social Care Departments are committed to working with all further and higher education institutions to support the learning and development of a future workforce.
- 4.5 Supporting student placements requires the participation of all agencies and the engagement of staff.
- 4.6 The involvement in student education is beneficial to staff, service users and the agency.
- 4.7 The number of placements offered by an establishment should reflect its capacity to provide appropriate support to enable the student to meet the placement competencies.
- 4.8 The Children and Families and Health and Social Care Departments expect that all agencies will allocate time for the student mentoring role to be carried out.
- 4.9 The number and type of placements offered by an agency should reflect its size, staffing profile and individual circumstances.
- 4.10 All agencies should identify an appropriate member of staff to be responsible for each student placement.
- 4.11 Placement guidance and assessment information should be presented to the agency prior to the student's arrival or on the first day of the placement.
- 4.12 Pre-placement visits by students should be encouraged.
- 4.13 A named tutor / contact from the further or higher education institution should be given to the staff member responsible for the student within the work place.
- 4.14 If there are concerns about the competency of a student, contact should be made at the earliest opportunity with the central co-ordinator, i.e. practice learning team or if appropriate with the provider. Contact can also be made with central staff for support, guidance and advice.
- 4.15 When determining the placement of students, an agency should consider the ratio of workers to service users, e.g. in an early years establishment it is important not to have a very high ratio of adults in correspondence to the number of children.
- 4.16 Students are supernumerary to the staffing complement within an agency.
- 4.17 Practice educators / mentors should make themselves aware of the Guidance on Safe Recruitment of School Volunteers, as students are considered to be, "volunteers".

- 4.18 No student should begin placement and have service user contact until the PVG process has been completed.

Implementation

- 5.1 For details of the completed [Implementation and Monitoring form](#), please access the relevant committee report.

Roles and responsibilities

6.1 The Responsibility of the Local Authority

- to promote student placements as a mutually beneficial professional development activity
- to promote student placements as a vehicle for future recruitment of staff
- to provide support and guidance to colleagues who are mentoring students
- to liaise as appropriate with providers over placement issues
- to work at both a local and national level to promote a learning culture and best practice
- to provide information regarding professional development opportunities for staff who are supporting students
- to liaise with providers to ensure that all students are members of the Protection of Vulnerable Groups scheme.

6.2 The Responsibility of the Provider

- to ensure student and visiting tutor are members of the Protection of Vulnerable Groups scheme prior to commencement of the placement
- to make contact with appropriate co-ordinators
- to inform the local authority that all students are registered with PVG and have received a PVG scheme update where appropriate, no later than four weeks prior to commencement with placement (or some such other date to be expressly agreed with the council)
- to confirm student attendance on the placement offered
- to provide agencies with placement guidance / requirements and assessment information
- to ensure the named tutor maintains contact with the establishment

- to discuss issues or concerns regarding student progress with a key member of staff in the establishment
- to offer support to student to enable them to meet placement criteria.

6.3 The Responsibility of the Establishment / Agency

- to alert the student to all relevant child and adult protection policies and procedures
- to arrange the appropriate time and experience for the student to fulfil the requirements of the placement
- to identify a key member of staff to co-ordinate arrangements for student placements
- to provide a suitable induction programme
- to record formative and summative assessment information and share with the student and course tutor
- to inform the line manager if difficulties with the placement arise
- to contact the central co-ordinator, i.e. practice learning team or if appropriate the course tutor if difficulties within the placement arise.

6.4 The Responsibility of the Student

- to make contact with the establishment prior to the placement if possible
- to present placement information to the key staff member in the agency
- to read the child and adult protection policies and procedures
- to participate in induction activities as organised by the staff within the agency
- to present their course work / records to supervising staff member as appropriate
- to inform the establishment and provider of non-attendance
- to adhere to confidentiality protocols and policy and procedure relating to security of information within the placement setting
- to raise concerns or issues to named staff member within the agency
- to adhere to a dress code that reflects your professional role and the responsibility of representing service users and your profession (see dress code guidance)
- to exercise reasonable caution when adding anything to a social networking site that may cause undue embarrassment to themselves or the agency (see social networking guidance).

6.5 Codes of Practice

- the student and supervisor must have knowledge and understanding of the relevant Codes of Practice for their particular profession.
- the relevant Codes of Practice represent the professional standards of practice and behaviour expected of the student and the agency.

Related documents

7.1 Legislative Context

The Role of Chief Social Work Officer – within the Principles, Requirements and Guidance pursuant to Section 5 (1) of the Social Work Scotland Act 1968.

The new [Equality Act](#) came into force on 1 October 2010, bringing together over 116 separate pieces of legislation into one single Act. Combined, they make up a new Act that will provide a legal framework to protect the rights of individuals and advance equality of opportunity for all.

7.2 Associated Documents

- [Learning Organization](#)
- [Scottish Social Services Council – Code of Practice](#)
- [General Teaching Council for Scotland – Code of Professionalism and Conduct](#)
- [College of Occupational therapists - Ethics and Professional Standards](#)
- [Nursing and Midwifery Council - The Code: Standards of Conduct, Performance and Ethics](#)
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- [Dress Code Guidance](#)
- [Establishment Student Policy Exemplar](#)
- [Enhancing the Quality of AHP Practice Education](#)
- [Guidance on Safe Recruitment of School Volunteers](#)
- [International Students requesting placements in City of Edinburgh Council Establishments](#)
- [Learning in Partnership: Policy for Student Placements Health and Safety responsibilities](#)

- [Learning in Partnership: Policy for Student Placements Health and Safety Emergency Contact List](#)
- [Learning in Partnership: Policy for student placements Health and Safety general guidelines](#)
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- [Student Accessing Courses](#)
- [Student Induction Checklist](#)
- [Student Placement Evaluation](#)
- [Student placement dates for nursery, primary, secondary and social work](#)
- [Student Supervision Record](#)

Equalities and impact assessment

- 8.1 For details of the completed [Record of Equality and Rights Impact Assessment \(ERIA\)](#) form, please access the relevant committee report.

Strategic environmental assessment

- 9.1 N/A

Risk assessment

- 10.1 *(Content required)*

Review

- 11.1 This policy is due to be reviewed one year from the approval date stated on the title page.

Corporate Policy and Strategy Committee

10.00am, Tuesday, 30 September 2014

BOLD Portfolio – Update report

Item number	7.7
Report number	
Executive/routine	
Wards	

Executive summary

The Better Outcomes through Leaner Delivery (BOLD) programme was established in late 2013 as an overarching approach to the Council's transformation programme. The initial focus of BOLD has been in addressing the Council's challenging financial outlook including reducing budgets and growing service demand.

This first phase of the programme concentrated on cross cutting themes for developing budget proposals to ensure the delivery of a balanced budget in 2015/16.

The programme has now progressed to focus on future years (2016/17 and 2017/18), bringing together the delivery of the first phase savings and transformational workstreams under one portfolio of change.

Links

Coalition pledges	P30
Council outcomes	CO25
Single Outcome Agreement	SO1 , SO2 , SO3 , SO4

BOLD Portfolio – Update report

Recommendations

- 1.1 Members of the Corporate Policy and Strategy Committee are asked to note:
 - 1.1.1 the establishment of BOLD as the Council's overarching portfolio of change;
 - 1.1.2 the 2015/16 budget proposals as they relate to BOLD themes; and
 - 1.1.3 the workstreams that comprise Phase 2 of the BOLD portfolio.

Background

- 2.1 BOLD was established to help address the financial and demand challenges the Council is faced in the coming years and to ensure a portfolio view could be taken of all the change activity within the Council. At the time the BOLD programme was established the Council's budget gap was:
 - £9.2m in 2015/16;
 - £19.8m in 2016/17; and
 - £2.8m in 2017/18.
- 2.2 As reported to the Finance and Resources Committee on the 7 May 2014, the budget gap for 2015/16 has subsequently increased from £9.2m to £21.7m.
- 2.3 The objectives for the first phase of the programme were to ensure that existing budget plans were delivered in order for the Council to operate within a balanced budget and to deliver better outcomes for customers through transformation. Through a dedicated programme team, BOLD have worked with staff from across the Council and drawn on best practice from across the public sector to build up a bank of proposals to help ensure the development of sustainable budgets.
- 2.4 The proposals that were developed through the first phase of the programme have contributed to the overall savings package for 2015/16 currently under consideration by elected members and have been grouped together under the themes of workforce controls, property rationalisation, income maximisation, neighbourhoods, transformation, co-ordinated services, efficiency, third party grants and enablers. Appendix 1 provides a breakdown of the potential savings by theme, subject to member approval.

Main report

- 3.1 The BOLD programme team was established with full time resources, led by the Council's Major Projects Manager and including Senior Officers from each of the Directorate areas to ensure cross Council support as well as strong links to all of the services areas. Service Heads were seconded into the BOLD team for the initial phase and to support the development of proposals for the 2015/16 budget setting process. The Director of Corporate Governance is the Senior Responsible Officer and the Corporate Management Team acts as the overall Programme Board, receiving regular updates on progress. In addition, a Member Officer Working Group has been established comprising members of the current administration and chaired by the Convener of the Planning Committee.
- 3.2 In order to fully understand the financial context, the breadth of existing savings projects and contribute to a balance budget the BOLD team initially focused on stress testing the financial baseline and capturing the all the expected benefits from the existing change programmes. BOLD has therefore been established as the Councils overarching portfolio of change. Appendix 2 sets out some of the change projects that were part of this baselining exercise.
- 3.3 The first phase of the programme focused on 12 themes:
- a. Workforce Management;
 - b. Property Rationalisation;
 - c. Income maximisation;
 - d. Neighbourhoods ;
 - e. Education Transformation;
 - f. Health & Social Care Transformation;
 - g. Co-ordinated Services;
 - h. Efficiency;
 - i. Structural Change;
 - j. Benchmarking;
 - k. Third party grants; and
 - l. Enablers and Tools.
- 3.4 The themes have been used to group together savings ideas many of which involve working across a number of Council services.
- 3.5 One of the successes of the BOLD programme has been the level of engagement with staff. To date over 1,500 staff ideas have been submitted, including over 150 blog posts and more than 400 email suggestions. These

were supplemented by a number of staff briefings and workshop sessions with staff from all across the Council. This has resulted in ideas being progressed locally, with a number of case studies of improved working practices and more effective use of resources under development. These form part of the BOLD local initiatives.

- 3.6 During the summer of 2014 a BOLD survey was carried out to assess the awareness of the programme. Initial results have been very encouraging with almost all of the respondents aware of the programme and its aims. 188 responses were received with 94% saying they understood BOLD and 68% confirming they have discussed BOLD ideas with colleagues. A summary of the results is attached at Appendix 3.
- 3.7 Following the contribution to the budget savings process for 2015/16, BOLD have focused on developing a strategic approach to making sustainable savings for future years, focusing on a clear definition of priorities. The priorities and opportunities for transformational change were considered at a Corporate Management team away day in July. The aim of this session was to develop a cohesive vision to support strategic priorities, focusing on collaboration opportunities across the organisation, reflecting the current drivers for public sector reform.
- 3.8 Discussion centred on the key workstreams from the first phase of the programme including neighbourhoods, property, better co-ordination of services and workforce management. Consideration was given to options available for services that would allow better performance against strategic outcomes as well as better outcomes for the customer, whilst also allowing sustainable financial planning.
- 3.9 The outputs of the away day were captured in a proposal for a portfolio of work for the second phase of BOLD. Indicative cost savings were also identified against each of these workstreams. This also sets out the proposed governance for BOLD portfolio moving forward. The outputs and projected savings are shown in Appendix 4.
- 3.10 Through the neighbourhoods and employees work the aim is to ensure that we deliver better and more focused outcomes as a local level for our customers supported by co-ordinated central services. The digital workstream is looking to build on the existing work undertaken on channel shift and ensure that we have the best data about our customers and services are as accessible as possible, maximising digital channel where appropriate.
- 3.11 Through the property and partnerships work the Council will continue to look at ways in which we can work more effectively with partners through sharing of assets, co-production and better alignment with the Council's strategic outcomes.
- 3.12 All of the proposals agreed through the budget process and as part of phase 1 will be monitored through the Corporate Programmes Office.

- 3.13 The second phase of the programme will align with the current budget setting and engagement process. Due diligence will be carried out on all the proposed savings indicated for 2016/17 and 2017/18 to inform the budget setting process in February 2015, with implementation following and the full financial benefits being derived from 1 April 2016.

Measures of success

- 4.1 Relevant measures include:
- Implementation and maintenance of agreed savings plans; and
 - Development and operation of a sustainable budget and business model aligned to the Council's priority outcomes

Financial impact

- 5.1 While there is no direct impact arising from this report, regular review of planning assumptions and tracking of savings delivery to ensure that the Council operates within a balanced budget is a key role in the effective financial management of the Council.

Risk, policy, compliance and governance impact

- 6.1 This report is being provided primarily for elected members' information and, as a result, there is no direct relevance to the recommendations at this stage. The BOLD portfolio regularly reports to, and progress is monitored through the Corporate Management Team.

Equalities impact

- 7.1 There is no direct impact of the report's contents and recommendations to the three Public Sector Equality Duty general duties, nor to the ten key areas of rights set out within the Council's Equality and Rights Framework.
- 7.2 Specific proposals to address the Council's overall savings requirement will be subject to a full Equality and Rights Impact Assessment, the main conclusions of which will be reported to the Finance and Resources Committee.

Sustainability impact

- 8.1 There is no direct relevance of the report's contents to sustainability-related issues. A carbon impact assessment will be undertaken on individual workstream proposals.

Consultation and engagement

- 9.1 The BOLD programme has engaged with staff using a number of methods, including drop in sessions, workshops, a dedicated e-mail address, ORB page, blog and communications updates. Specific work has also been progressed with apprentices and graduates under the BOLD future works and with front line staff through BOLD local. This will continue throughout the programme.
- 9.2 The governance arrangements to date have involved reporting to the Member Officer Group and well as the Corporate Management Team. As a number of BOLD proposals are likely to be progressed through the budget framework, these will be reported to the Finance and Resources Committee and thereafter form the basis of a public engagement process.

Background reading/external references

[Revenue and Capital Budget Update](#), Finance and Resources Committee, 7 May 2014

Sue Bruce

Chief Executive

Contact: Alan Coyle, Major Projects Manager

E-mail: alan.coyle@edinburgh.gov.uk | Tel: 0131 529 5211

Links

Coalition pledges	P30 – Continue to maintain a sound financial position including long-term financial planning.
Council outcomes	C025 – The Council has efficient and effective services that deliver on objectives
Single Outcome Agreement	SO1- Edinburgh's Economy delivers increased investment , jobs and opportunities for all. SO2- Edinburgh's citizens experience improved health and wellbeing, with reduced inequalities in health.

Appendices

SO3 – Edinburgh’s children and young people enjoy their childhood and fulfil their potential

SO4 – Edinburgh’s communities are safer and have improved physical and social fabric.

Appendix 1 – Bold themed savings proposals

Appendix 2 – Portfolio of change

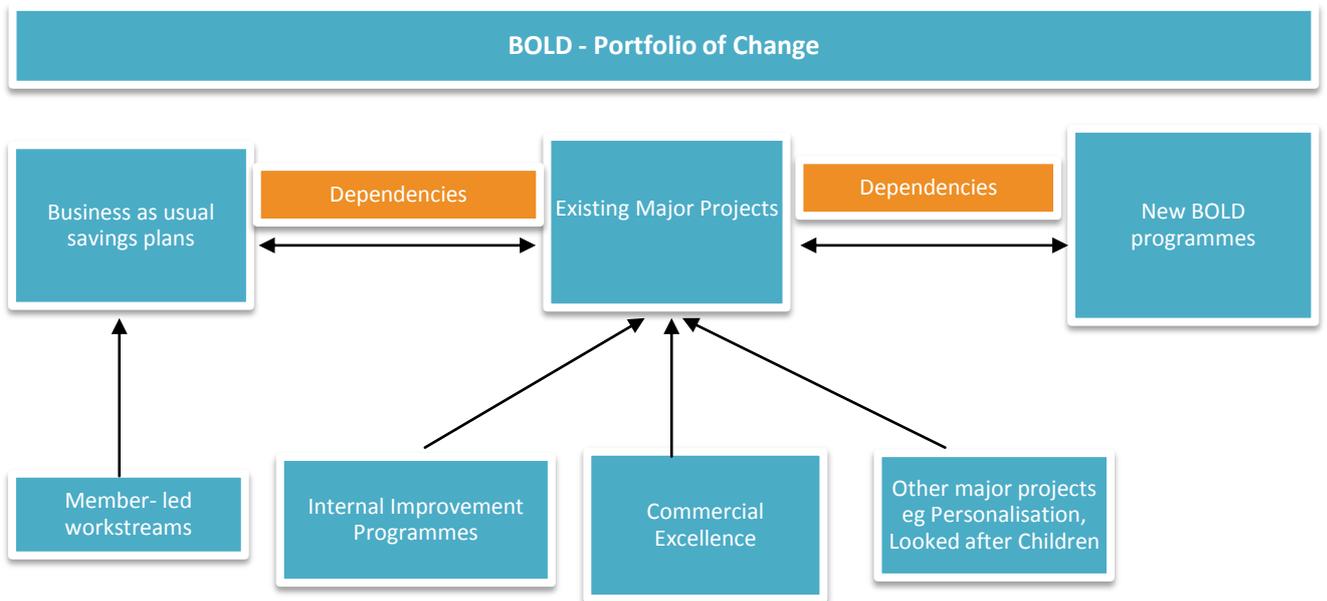
Appendix 3 – BOLD survey results

Appendix 4 – BOLD Phase 2 Portfolio

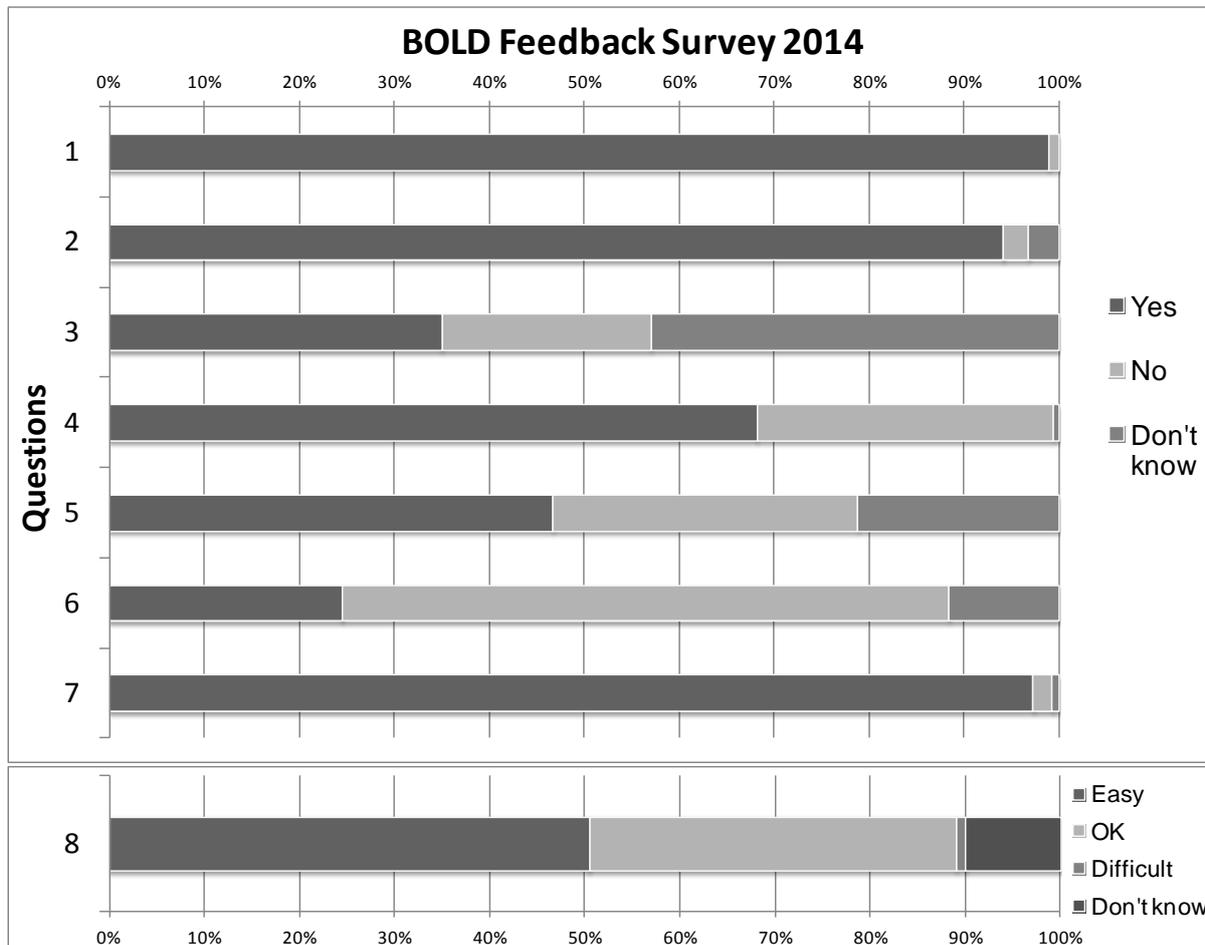
APPENDIX 1 – 2015/16 BUDGET PROPOSALS BY BOLD THEME

BOLD THEME	PROPOSED SAVING
Workforce Management	£3.606m
Property Rationalisation	£0.610m
Income maximisation	£4.348m
Neighbourhoods	£0.300m
Transformation	£1.778m
Co-ordinated Services	£0.680m
Efficiency	£6.459m
Third sector payments	£4.278m
Enablers and tools	£0.088m
TOTAL	£22.147m

Appendix 2 –Portfolio of Change (as at December 2013)



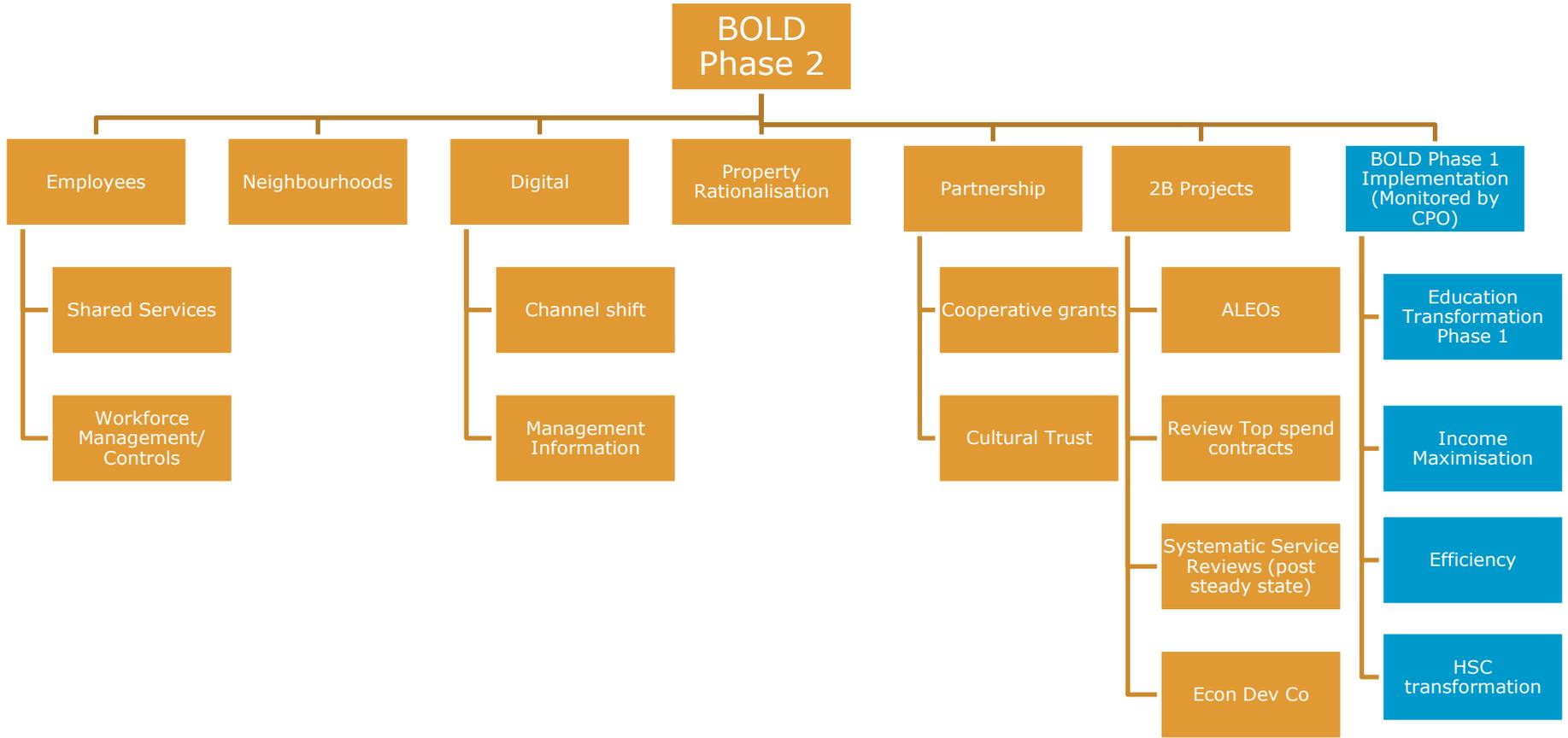
APPENDIX 3 – BOLD SURVEY RESULTS



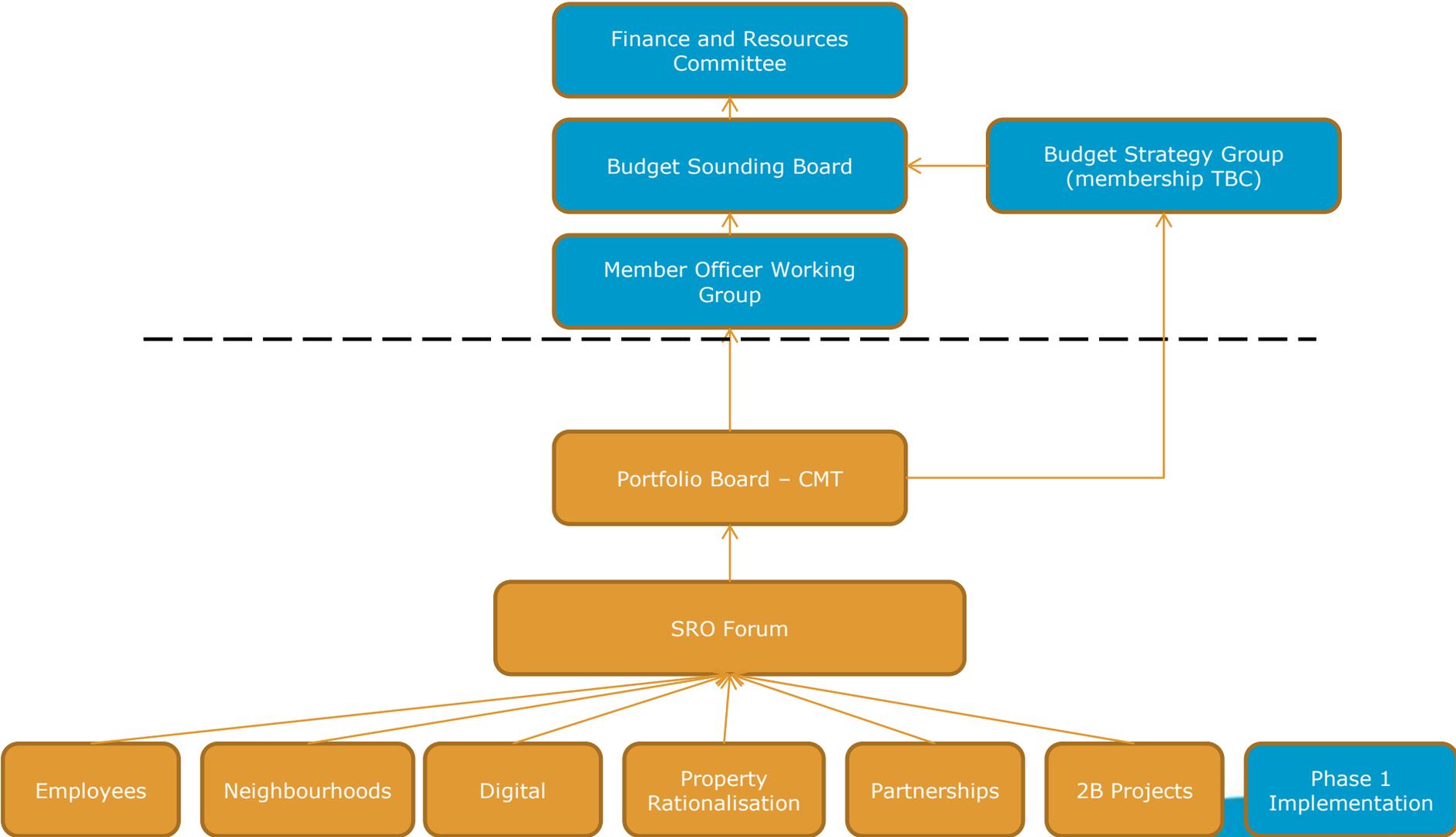
Questions:

1. Have you heard of the BOLD Programme?
2. Do you know what the BOLD Programme is about?
3. Do you think the BOLD Programme will help the Council make significant financial savings?
4. Have you and your colleagues had any discussions about BOLD over the past 6 months?
5. Did you or your team put any ideas or proposals forward for BOLD?
6. Did you receive any feedback about the idea or proposal you put forward?
7. Do you remember seeing any communications about BOLD over the past 6 months (by email, on the Orb or otherwise)?
8. How easy did you find the process to put forward an idea or proposal for BOLD?

BOLD Portfolio



BOLD Phase 2 - Governance



Meeting the challenge –

Proposed savings targets 16/17 & 17/18

Work stream	2016/17 £m	2017/18 £m
Employees (shared services and workforce management)	12.47	3.28
Neighbourhoods	7.40	7.40
Digital & Channel Shift	1.00	3.00
Property Optimisation	1.80	2.20
Partnership and cooperative grants	4.88	3.67
Others	3.25	2.00
Total	30.80	21.55
Budget gap	30.80	24.80
Balance	0.00	3.25

Corporate Policy and Strategy Committee

10.00am, Tuesday, 30 September 2014

Finance and Resources Policy Development and Review Sub-Committee Work Programme August 2014 – January 2015 – referral report from the Finance and Resources Committee

Item number	7.8
Report number	
Wards	All

Executive summary

The Finance and Resources Committee on 28 August 2014 agreed to refer the Policy Development and Review Sub-Committee Work Programme for 28 August 2014 to 20 January 2015 to the Corporate Policy and Strategy Committee for information.

Links

Coalition pledges	See attached report
Council outcomes	See attached report
Single Outcome Agreement	See attached report
Appendices	See attached report

Terms of Referral

Finance and Resources Policy Development and Review Sub-Committee Work Programme August 2014 – January 2015

Terms of referral

- 1.1 On 28 August 2014 the Finance and Resources Committee considered the Policy Development and Review Sub-Committee Work Programme for 28 August 2014 to 20 January 2015.
- 1.2 The Finance and Resources Committee agreed:
 - 1) To approve the Policy Development and Review Sub-Committee Work Programme for 28 August 2014 to 20 January 2015.
 - 2) To refer the Work Programme to the Corporate Policy and Strategy Committee for information.

For Decision/Action

- 2.1 The Corporate Policy and Strategy Committee is asked to note the Finance and Resources Policy Development and Review Sub-Committee Work Programme for 28 August 2014 to 20 January 2015.

Background reading / external references

[Finance and Resources Policy Development and Review Sub-Committee Work Programme](#)

Carol Campbell

Head of Legal, Risk and Compliance

Contact: Veronica MacMillan, Committee Clerk

E-mail: veronica.macmillan@edinburgh.gov.uk | Tel: 0131 529 4283

Links

Coalition pledges	See attached report
Council outcomes	See attached report
Single Outcome Agreement	See attached report
Appendices	See attached report

Item 6.16 - Work programme

Finance and Resources

Policy Development and Review Subcommittee

28 August 2014 – 20 January 2015

Title / description	Sub section	Category or type	Lead officer	Starting point	Stakeholders	Progress updates	Start date	Due date
Income Maximisation/Generation			Hugh Dunn, Head of Finance Alan Coyle, Major Projects Manager	Long-Term Financial Plan, Five Year Budget Framework				2 September 2014
Health and Social Care Integration			Hugh Dunn, Head of Finance Peter Gabbitas, Director of Health and Social Care		Public, community, business and senior officials.			4 November 2014
Strategic Workforce Planning – update			Linda Holden, Interim Head of People and Organisation		Workforce Workstream	Considered on 8 August 2014		
Interim review of Budget Engagement on Budget			Hugh Dunn, Head of Finance		Public, community,			2 December

Title / description	Sub section	Category or type	Lead officer	Starting point	Stakeholders	Progress updates	Start date	Due date
Framework 2015/18 Community Transport – Update			Kirsty-Louise Campbell, Governance Manager Karen Kelly, Head of Corporate Programmes office		business and senior officials			2014
Findings of Budget Engagement for Budget Framework 2015/18					Public, community, business and senior officials			20 January 2015

Corporate Policy and Strategy Committee

10am, Tuesday 30 September 2014

Integrated Children's Services – referral from the Education, Children and Families Committee

Item number	8.1
Report number	
Wards	All

Executive summary

The Education, Children and Families Committee on 11 September 2014 considered a report outlining the consultation process regarding the further development of Integrated Children's Facilities.

Links

Coalition pledges

Council outcomes

Single Outcome Agreement

Appendices

Integrated Children's Facilities – report by the Director of Children and Families

Terms of Referral

Integrated Children's Services

Terms of referral

- 1.1 The Education, Children and Families Committee on 11 September 2014 considered a report outlining the consultation process regarding the further development of Integrated Children's Facilities.
- 1.2 The Education, Children and Families Committee agreed:
 - 1) To note feedback from the consultation process which demonstrates staff support for further integration of services.
 - 2) To request a further paper to be submitted to the December Committee detailing the proposal to be submitted to the Scottish Government along with details of Health, and Social Care Integration within the city.
 - 3) To refer the report to the Corporate Policy and Strategy Committee for information.

For Decision/Action

- 2.1 The Corporate Policy and Strategy Committee is asked to note the attached report.

Background reading / external references

Education, Children and Families Committee 11 September 2014.

Carol Campbell

Head of Legal, Risk and Compliance

Contact: Ross Murray, Assistant Committee Clerk

E-mail: Ross.Murray@edinburgh.gov.uk | Tel: 0131 469 3870

Links

Coalition pledges

Council outcomes

Single Outcome Agreement

Appendices

Integrated Children's Facilities – report by the Director of Children and Families

Education, Children and Families Committee

10am, Thursday, 11 September 2014

Integrated Children's Services

Item number

Report number

Executive/routine

Executive

Wards

All

Executive summary

Over the last three months a consultation process has begun to progress the further development of Integrated Children's Services as reported to Committee in May 2014.

The original high level paper provided the platform for consultation and engagement across the areas of provision within scope of an Integrated Service. This engagement has primarily involved staff as well as recognising Trade Union consultation processes where appropriate and relevant to the changes proposed. A summary of the staff consultation survey is attached as Appendix 1. There are further plans to work directly with children, young people and their families to seek their views on ways to improve service design and delivery as we go forward with integration.

The proposal will establish systems that further develop effective partnership working at a local level to deliver even better outcomes for children, young people and their families here in Edinburgh.

Further detail about the locality structure to deliver Integrated Children's Services is contained at Appendix 2. Following the consultation process, firm proposals (including management structures) for Integrated Children's Services will now be developed and submitted to the Scottish Government along with the paper which will set out the integrated adult health and social care arrangements within the city.

Links

Coalition pledges [P1](#), [P36](#)

Council outcomes [CO1-CO6](#)

Single Outcome Agreement [SO2](#), [SO3](#)

There will be no immediate impact on management and organisational structures within Children and Families: any changes that occur going forward will be consistent with work to strengthen locality management and service delivery being developed as one of the key BOLD workstreams.

Recommendations

- 1.1 The Committee is asked to note the feedback from the consultation process which demonstrates staff support for further integration of services.
- 1.2 That the Committee requests a further paper to be submitted to the December Committee detailing the proposal to be submitted to the Scottish Government along with details of Health and Social Care Integration within the city.
- 1.3 That this report is forwarded to the Corporate Policy and Strategy Committee for information.

Integrated Children's Services

Background

- 2.1 There is a long history of partnership working in children's services in Edinburgh, supported by the Edinburgh Children's Partnership and Integrated Plan for Children and Young People.
- 2.2 The proposal to move towards greater integration will build on this work and also take account of the changes required to the management of a range of health services when the existing Community Health Partnership ceases to exist in line with the establishment of the adult Health and Social Care Partnership by April 2015.

Main report

- 3.1 The Christie Commission report outlined the importance of integrating public services if we wished to improve outcomes for the people of Scotland. The four Lothian Local Authorities and NHS Lothian have moved forward promptly with proposals for integration. The programme of work to deliver an integrated children's service builds on an ethos of integrated children's service planning in Lothian and follows on from considerable work in establishing the shadow Health and Social Care Partnerships.
- 3.2 The creation of shadow Health and Social Care Partnerships (Joint Integrated Boards) and anticipated future dissolution of the Community Health Partnerships (CHPs) in or beyond April 2015 has a consequential effect for the future management of universal community child health services.
- 3.3 There is a strong desire to strengthen the integration of children's services through collaborative working to improve outcomes for, and the wellbeing of, children, young people and families in Edinburgh. Over the last six months discussions have taken place between Chief Executives of NHS Lothian, City of Edinburgh Council, Non-Executive members and CEC Elected Members on how best to build upon the successful partnership.
- 3.4 An effective children's integrated planning partnership is already in place comprising of officers representing the Council services for children, the full range of health services for children, police and the voluntary sector. However there is not a joined up governance arrangement and this is a particular gap and one that the Chief Executives are committed to resolving through effective alignment of service planning, joint commissioning and quality assurance.

- 3.5 There is no intention of City of Edinburgh Council to delegate Children and Families function to the emerging Health and Social Care Partnership nor is there a desire to delegate universal health service provision to the Health and Social Care Partnership. There is, however, a desire to have greater management alignment across all children's services and a joined up governance mechanism to support these arrangements. This has been taken into account when considering the future potential management and governance arrangements for all children's health services currently being delivered in Edinburgh, including those within the Women and Children's Directorate and Edinburgh CHP.
- 3.6 Feedback from the staff engagement exercise is largely supportive of the direction of travel with the majority of staff responding (79%) strongly agreeing/agreeing with the statement "I think the proposals will strengthen partnership working in Edinburgh" and 79% agreeing that the proposals will have a positive impact on **outcomes** for children and young people.
- 3.7 The next phase of engagement will focus on working directly with children, young people and their families to gather ideas and suggestions for improving service delivery. Early feedback from consultation with parents and carers in Total Craigroyston would indicate a real willingness to engage in these discussions and opportunities and ideas for service redesign as a result.
- 3.8 Further work to develop integration at a neighbourhood level will be progressed as an integral part of the BOLD workstream addressing this issue and the development of management structures at a local level will reflect this approach.
- 3.9 The model of integration consolidates the good work that is taking place currently at school cluster level and supports the realignment of wider resources around each high school, its feeder primaries, pre-school provision and health visiting and school nursing services.
- 3.10 Opportunities for greater alignment of boundaries across the city are currently being explored across Council service areas and with partners and a paper is being prepared for discussion at the September Edinburgh Partnership. Further development of the integration agenda will take due account of these discussions.

Measures of success

- 4.1 The Integrated Children's Plan, the Children and Families Service Plan and the NHS Lothian Children and Young People's Health and Wellbeing Strategy outline the areas of activity which will maintain and improve outcomes for children, young people and their families in Edinburgh. The existing performance framework which supports these plans will be reviewed and further developed to acknowledge Integrated Services. We would expect to see improvements in the priority areas within these plans. We would also expect that

feedback from staff would demonstrate the added value of further integration through the introduction of greater co-location, shared infrastructure resources and improved communication and information sharing.

Financial impact

- 5.1 The development of Integrated Services will be managed within existing Children and Families and NHS Lothian budgets and we anticipate that efficiencies can be achieved through the development of more shared resources and business support functions at a neighbourhood level.

Risk, policy, compliance and governance impact

- 6.1 There are no direct implications for policy, compliance or governance arising from the recommendations in this report.

Equalities impact

- 7.1 In the next stage of development, a full Equalities and Right Impact Assessment will be undertaken and the outcomes of this will be addressed both in strategic planning and operational service delivery implementation. It is anticipated that the development of better integrated children's services should help us address areas of inequality more effectively and consistently.

Sustainability impact

- 8.1 Developing models of collocation and shared services will have a positive effect in terms of property use and associated energy requirements and the development of more integrated working practices should contribute to more sustainable services in the longer term.

Consultation and engagement

- 9.1 This proposal to develop Integrated Children's Services continues to build on the very positive work of the multi-agency Edinburgh Children's Partnership, its Chief Officer group and each of the Strategic Oversight Groups designed to ensure multi-agency delivery of actions within the Integrated Plan for Children and Young People.
- 9.2 A full information, consultation and engagement programme will be developed to explore the potential in this discussion document and to determine the best structures and approaches to delivering integrated services which improve outcomes.

Background reading/external references

- 10.1 ["Towards Integrated Children's Services" – Appendix 1 Education Children and Families Committee Report March 2014](#)

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Links

Coalition pledges	<p>P1. Increase support for vulnerable children, including help for families so that fewer go into care.</p> <p>P36. Develop improved partnership working across the Capital and with the voluntary sector to build on the “Total Craigroyston” model.</p>
Council outcomes	<p>CO1. Our children have the best start in life, are able to make and sustain relationships and are ready to succeed.</p> <p>CO2. Our children and young people are successful learners, confident individuals and responsible citizens making a positive contribution to their communities.</p> <p>CO3. Our children and young people in need, or with a disability, have improved life chances.</p> <p>CO4. Our children and young people are physically and emotionally healthy.</p> <p>CO5. Our children and young people are safe from harm or fear of harm, and do not harm others within their communities.</p> <p>CO6. Our children and young people’s outcomes are not undermined by poverty and inequality.</p>
Single Outcome Agreement	<p>SO2. Edinburgh’s citizens experience improved health and wellbeing, with reduced inequalities in health.</p> <p>SO3. Edinburgh’s children and young people enjoy their childhood and fulfil their potential.</p>
Appendices	<p>Appendix 1 - Integrated Children’s Services staff survey</p> <p>Appendix 2 - Integrated Children’s Services Management Group - Terms of Reference</p>

Integrated Children's Services staff survey

**Edinburgh Children's
Partnership
6 August 2014**



Survey ran between May and end of July 2014

265 responses

Schools	43
Other Children and Families	36
Health Visiting	31
Royal Sick Children's Hospital staff	28
AHPs	27

Survey asked:

'I think the proposals for integrating children's services will strengthen partnership working in Edinburgh'

79% agreed (strongly agree and agree)

'The proposals will support me to deliver a more effective service'

61% agreed

For both statements, others tended to tick 'neither agree or disagree' rather than disagree options

'With reference to your answers above, can you tell us about any opportunities or benefits you see in relation to the proposals?'

189 people responded, with a number of themes and issues emerging:

- Better multi-agency partnership working, increased links, more seamless service for children and their families
- Simpler, more effective access to services with less waiting time
- More effective planning and delivery of services

- ❑ Help for children and families to get the support they need earlier
- ❑ Better understanding/awareness of different services; better communication and relationships between professionals
- ❑ Opportunity to build on the success of CSMGs and enhance the implementation of GIRFEC further
- ❑ Less bureaucracy and less duplication
- ❑ More scope for local 'place-based' approaches like Total Craigroyston/neighbourhood

'Can you tell us about any barriers or disadvantages you see in relation to the proposals?'

180 people answered. Main issues:

- ❑ Worries that issues re capacity, workloads and staff levels will make the proposals unrealistic and difficult/impossible to achieve
- ❑ Concerns proposals are more about saving money than improving outcomes
- ❑ ICT systems do not support integration
- ❑ Issues re the phrase 'do whatever it takes' – it needs to be defined better, managers need to buy into it, staff need more flexibility to be able to 'do whatever it takes'

- ❑ It might lead to more meetings/more time spent in meetings
- ❑ Potential issues around confidentiality
- ❑ Tensions between centralised/strategic and neighbourhood/local approaches
- ❑ The need for both staff roles and management/governance arrangements to be clear – worries about blurring if not
- ❑ All very high level at the moment – hard to see how it will translate on the ground/what difference it will make on a day to day basis

79% agree that the proposals *will have a positive impact on **outcomes** for children and young people*

18% think they will make *little or no difference*

3% think they will have a *negative impact*

75% agree that the proposals *will have a positive impact on **services** for children and young people*

19% think they will make *little or no difference*

6% think they will have a *negative impact*

165 people answered the first question and **128** answered the second (although more than 30 of these were 'see above').

Similar issues in both responses:

Positives:

- Streamlining and better co-ordinating the response of services
- Helping children and families at an earlier stage
- Building on the strengths and responding to the views of parents and young people
- Improving relationships, communication and awareness between services

- ❑ Greater consistency
- ❑ Less complexity
- ❑ Better service planning

Some concerns that:

- ❑ If changes aren't implemented well they will have a negative effect
- ❑ Lack of resources, funding and staffing will mean that aims are not met
- ❑ There isn't enough detail at this stage to be able to say
- ❑ Some services' commitments to working together are 'on paper' only and make little difference in practice

Next steps...

- Engagement with children and young people
- Engagement with parents/carers, community groups
- Early September to late November

Integrated Children's Services Management Group

Terms of Reference

Integrated Children's Services Management Groups (ICSMGs) comprise locality managers working together to improve outcomes for children, young people and their families by:

- making decisions and directing resources to support delivery of the Strategic Objectives in the Integrated Plan and to address specific local concerns promptly and effectively
- monitoring the consistent implementation of the Getting it right for every child Core Components within their sphere of responsibility and across the locality

Specific functions:

- Identify local trends and themes using agreed authority-wide data sets
- Receive reports as required on progress against agreed targets
- Identify and deliver solutions to barriers to effective local service delivery
- Develop effective links with adult services to better meet the needs of families
- Drive forward positive changes to culture, systems and practice across all partners
- Report to the Children's Partnership on activity to meet Strategic Outcomes
- Identify service/resource gaps which require strategic intervention and support
- Retain an overview of multi-agency staff training to achieve objectives
- Identify and celebrate good practice and success

Membership

Core membership will consist of the following:

- Social Work Practice Team Manager
- Senior Education Manager
- Principal Educational Psychologist
- NHS Service Manager
- Police Scotland
- SfC Service Manager
- Early Years Manager
- ASN Service Manager
- EVOC Children and Families Network representative

Additional partners may be represented based on localised links and relevant issues

- Reporter's Administration
- Skills Development Scotland
- CLD
- NHS Audit Services
- Social Work Adult Teams

Expectations of Members

- Attendance at meetings*
- Authority to make decisions and allocate resources

- Timely communication to allow for meeting preparation
- Provision of relevant and up to date information to facilitate discussion and progress
- Contribution to decision making for specific cases and agreed action
- Commitment to service improvement
- Ensuring all actions and tasks agreed by the group are acted upon and treated as core business by staff
- Reporting back on action and impact at agreed intervals

*sending informed substitutes – with appropriate delegated authority – *only* when necessary

Role of the Chair

The Chair will be nominated from the membership of the Core Group and will play a crucial role in ensuring the effective operation of the ICSMG to meet its agreed aims

Support for the ICSMG will be provided by the ICS Area Co-ordinator

Frequency of meetings

ICSMG meetings will take place on a 6 weekly basis, but require to have a mechanism to contact each other to access information quickly should the need arise.

Area managers will use their own profession's network of support and resources to resolve issues without having to hold back action on children's cases to wait for area managers to meet.