



## Policy and Resources Committee – 7 January 2019

### Groundwork Northamptonshire

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#### **Purpose of report**

To ask Members to approve a revised Service Level Agreement for Groundwork Northamptonshire to commence on 1 April 2019.

#### **Attachments**

Appendix 1: Equalities Impact Assessment (initial screen)

Appendix 2: Privacy Impact Assessment (Full)

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#### **1.0 Background**

- 1.1 Groundwork Northamptonshire (Groundwork) was established in 2005 and has supported us with our community development and youth-based initiatives from its inception to the present day. ENC was one of the sponsoring organisations supporting the creation of Groundwork in the county at the time.
- 1.2 Members have considered a number of reports over the last 13 years about the various projects and initiatives Groundwork has delivered for ENC, and approved funding packages to support this work.

#### **2.0 Current work and proposed changes**

- 2.1 Policy and Resources Committee approved Groundwork's current Service Level Agreement (SLA) at its meeting 7 November 2016 (minute 245). The SLA began on 1 April 2017 and ends on 31 March 2020. It uses funding of £10K per year to part-fund two "JAM in the Hood" (JAM) projects. JAM is Groundwork's award-winning youth programme that helps young people to understand the consequences of their behaviours, at the same time as engaging them in positive activities.
- 2.2 In 2017/18, a hybrid version of JAM took place in Raunds. In this current financial year, a similar but larger project is underway in Oundle that is covering a number of issues, as well as improving the way ENC engage with young people and schools. This project is utilising the entire £10K funding allocated for 2018/19.
- 2.3 ENC officers and the senior management at Groundwork monitor the SLA regularly. Although delivery is successful, their mutual feeling is that JAM projects in East Northants tend to provide short-term fixes to problems. In other parts of the county, especially in the larger urban areas, JAM projects have merged with other long-term initiatives. Although JAM activity generally focuses on working with groups of young people, things often crop up around an individual's background and home life that need more tailored and intensive support to help that young person.
- 2.4 With our multi-agency hub working approach in mind, officers feel there is great opportunity to embed Groundwork's activities into that arrangement. It would enable a Groundwork officer to work alongside others, including ENC and the police; to help shape targeted support for young people and their families. Work began a while ago

with a specific programme focusing on young people on the edge of exclusion from school. A dedicated police officer worked with ENC's Community Development Officer (Early Help and Safeguarding) to develop the programmes, which included specific emphasis on primary schools. Unfortunately, the work stalled due to the police officer being deployed elsewhere within the force. A Youth Development Worker role in the hub arrangement would facilitate the restart of this programme and develop interventions for supporting young people heading for exclusion.

- 2.5 Although the emergence of the hub has been slow, we now have the learning from the Northampton East pilot to strengthen our approach. Various new practitioner posts based within other agencies are ready to support our early help arrangements in EN, particularly around support for young people who have adverse childhood experiences (ACEs).
- 2.6 The proposal is for an 18.5 hour per week post, employed directly by Groundwork to support our early interventions for young people and their families. It would comprise 6 hours based in the Early Intervention Hub to support the multi-agency Team Around the Family (TAF) approaches, 6.5 hours for outreach and project delivery across EN and 6 hours based within Groundwork's development team to identify and develop further opportunities with other development workers, including external funding opportunities for future projects. This concept is similar to the way the Northamptonshire Domestic Abuse Service (NDAS) Support Worker operates, which is funded by ENC with £15K per year.

### **3.0 Revised SLA**

- 3.1 Changing the focus of Groundwork's work, as described in section 2 above, requires revisions to the SLA in terms of service delivery.
- 3.2 The main changes to the SLA comprise: removal of requirements for undertaking JAM projects and in East Northamptonshire delivered through the multi-agency hub.
- 3.3 The revised SLA would be operational from 1 April 2019.

### **4.0 Equality and Diversity Implications**

- 4.1 An initial Equality Impact Assessment has been carried out and only neutral or positive impacts have been identified. The positive impacts will be for: mental health conditions, learning difficulties, rural isolation and socio-economic isolation. The initial Equality Impact Assessment (initial screen) is attached at Appendix 1 for information.

### **5.0 Privacy Impact Implications**

- 5.1 An initial Privacy Impact Assessment (PIA) was carried out. The proposals will mean Groundwork still working with individual young people and their families; only now as part of our multi-agency hub work. As this requires Groundwork to use data differently, a full PIA has been prepared and attached at Appendix 2 for Members' information.

### **6.0 Legal Implications**

- 6.1 There are no statutory requirements or duties in respect of our arrangements with Groundwork.

## **7.0 Risk Management**

7.1 Groundwork's SLA makes provision for managing risks associated with the work it provides. This is reviewed as part of the SLA monitoring.

## **8.0 Resource and Financial Implications**

8.1 As referred to earlier in this report, £10K per year is allocated to support Groundwork deliver the SLA, up to when the agreement ends 31 March 2020. As indicated above, the £10K provision in this current financial year is committed to the Oundle project.

8.2 If Members are minded to support these proposals and the necessary amendments to the SLA, an additional £5K per annum is required to meet all employment and travel costs associated with the employment of the post. Groundwork would be responsible for recruiting to the post in readiness for a start date of 1 April 2019. On the basis of this, the financial contribution to Groundwork has been increased to **£15K** in the draft 2019/20 budget proposals. The draft budget will be considered by Council on 25<sup>th</sup> February 2019.

## **9.0 Constitutional Implications**

9.1 There are no constitutional implications arising from this proposal.

## **10.0 Implications for our Customers**

10.1 These proposals will strengthen our multi-agency work and increase the range of services it can provide around early help and targeted support for some of our most vulnerable residents.

## **11.0 Consultation**

11.1 Councillor Gill Mercer is this council's nominated representative on Groundwork's Board of Trustees and supports these proposals.

## **12.0 Corporate Outcomes**

12.1 These proposals and the work of Groundwork contribute to our corporate outcomes as follows:-

- **Good Quality of Life – Safe and Healthy** – the activities provided by Groundwork contribute to a good quality of life in East Northamptonshire, particularly around safer communities, healthier lifestyles and increased participation in active recreation.
- **Effective Partnership Working** – working in partnership with Groundwork supports our multi-agency approaches to helping and supporting young people and their families with early help and targeted support.



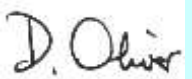
## **13.0 Recommendation**

13.1 The Committee is recommended to

- (1) Approve the proposals and the amendments required to Groundwork's Service Level Agreement, as set out above.

- (2) Note the provision of £15K for Groundwork's revised SLA in the draft 2019/20 budget proposals.

*(Reason – to align Groundwork's activities to the work of the multi-agency hub for early help and targeted support for children and their families.)*

<b>Legal</b>	Power: <b>Local Government Act 2000</b>				
	Other considerations: None				
<b>Background Papers:</b> None					
<b>Person Originating Report:</b> Mike Greenway, Community Partnerships Manager ☎ 01832 742244 ✉ mgreenway@east-northamptonshire.gov.uk					
<b>Date:</b> 13 December 2018					
<b>CFO</b> 19/12/18		<b>MO</b> 19/12/18		<b>CX</b> 19/12/18	

## Initial Equalities Impact Assessment

Title of proposal being assessed:	<i>Groundwork Northamptonshire - Revised Service Level Agreement</i>
What type of proposal is this an assessment of?	<i>Service - Change</i>
What are the aims and/or objectives of the proposal and the intended outcomes?	<i>Provision of a Youth Development Worker to support multi-agency partnership hub working around early help and interventions for children and their families</i>
Who is intended to benefit from this proposal?	<i>Residents of East Northants</i>
Who are the main stakeholders in relation to the proposal?	<i>Partners supporting our multi-agency hub working arrangements</i>
How is the success of the proposal to be measured?	<i>Achievement of outcomes set out in each individual's targeted action plans</i>
Name of person completing Initial Screening:	<i>Mike Greenway</i>
Job title / role of person completing Initial Screening:	<i>Community Partnerships Manager</i>
Date of Initial Assessment	<i>13/12/2018</i>

Instructions: For **every** category in column A, below, submit a positive, negative or neutral assessment by entering an **x** in the relevant cell. Add an explanation in the Reason box, where applicable, including a specification of any sub-group affected. There may be both a positive and negative impact for the same category (e.g. a policy may be positive for young children but negative for older people).

Equality Group	Positive Impact	Negative Impact	Neutral Impact	Explanation and Evidence (e.g. data, consultation results, customer feedback)
<b>Gender:</b>				
Consider Women/Girls, Men/Boys, Transgender individuals.			X	
<b>Sexual Orientation:</b>				
Consider, for instance: Lesbians, gay men and bisexuals Any other sexual orientation			X	
<b>Race/Ethnicity:</b>				
Consider, for instance: • White British people, • White non-British people • Asian or Asian British people • Black or Black British people • Chinese people • People of mixed heritage • Travellers (Gypsy/Roma/Irish heritage) • People from any other ethnic groups • People who do not have English as their first language			X	
<b>Disability:</b>				
Physical impairment, e.g mobility issues which mean using a wheelchair or crutches.			X	
Sensory impairment, e.g blind/having a serious visual impairment, deaf/having a serious hearing impairment.			X	
Mental health condition, e.g depression or schizophrenia	X			Some children and young people disclose or are identified as suffering from mental health conditions. The work will provide a range of support mechanisms for this group.
Learning disability/difficulty, e.g. Down's syndrome or dyslexia, or cognitive impairment such as autistic spectrum disorder	X			Some children and young people disclose or are identified as suffering from Aspergers, spectrum disorders etc. The work will provide a range of support mechanisms for this group.
Long-standing illness or health condition, e.g. cancer, HIV. Diabetes, chronic heart disease or epilepsy			X	
Other health problems or impairments ( <i>please specify if appropriate</i> )			X	
<b>Marriage and Civil Partnership:</b>				
People in a Marriage or Civil Partnership			X	
<b>Pregnancy and Maternity:</b>				
People who have just had a baby or who are pregnant.			X	

<b>Age:</b>				
Older People (60+)			X	
Children and Young People (see guidance for definition)			X	
<b>Religion/Belief:</b>				
Consider, for instance: <ul style="list-style-type: none"> <li>• Christian</li> <li>• Hindu</li> <li>• Muslim</li> <li>• Sikh</li> <li>• Buddhist</li> <li>• any other religion or belief (including holding no belief)</li> </ul>			X	
<b>Other Potentially Affected Groups</b>				
Rural Isolation - People who live in rural areas e.g isolated geographically, lack of internet access	X			The work of the multi-agency hub provides resources to support those experiencing rural isolation across the district.
Socio-economic Exclusion – e.g. people who are on benefits, have low educational attainment, single parents, people living in poor quality housing, people who have poor access to services, the unemployed or any combination of these and the other protected strands	X			The work of the multi-agency hub provides resources to support those experiencing socio-economic exclusion across the district.
Any other potentially affected groups ( <i>please specify</i> )			X	

**Privacy Impact Initial Assessment Form**

*For ease, where the term 'project' is used, it will refer equally to a project, review of a process, or a policy for the purposes of the assessment.*

Policy/Project Name:	Groundwork Northamptonshire – Revised Service Level Agreement
Reference/Identifier (e.g. Project number)	
Name of project/policy owner:	Mike Greenway
Date of assessment:	18 December 2018

**Will the project/policy result in the collection/use/control of any Personal Data?**

	Please tick	Next step...
<b>No</b>		If no, you need take no further steps. Save and submit this form with your policy, or save it with your project documentation.
<b>Yes</b>	<input checked="" type="checkbox"/>	If yes, answer the questions below. Submit the completed form to the Information Governance Manager.

**For projects/policies utilising personal data, please answer all questions. Please provide relevant explanations/descriptions:**

Will the project involve the collection of new information about individuals?	Potentially – Groundwork will work as part of our multi-agency hub arrangement. The work will specifically involve supporting children, young people and their families with early help interventions aimed at preventing them escalating towards high level social care support packages. As such personal details will be collected as the work progresses.
Will the project compel individuals to provide information about themselves?	Potentially – as part of the support role provided by the hub working arrangement.
Will information about individuals be disclosed to organisations or people who have not previously had routine access to the information?	Only as part of the hub working arrangements
Are you using information about individuals for a purpose it is not currently used for, or in a way it is not currently used?	No – all partner organisations involved in our hub arrangements are (or will be) party to Information Sharing Agreements (ISA) across Northamptonshire for control and sharing of information.

Does the project involve you using new technology which might be perceived as being privacy intrusive? For example, the use of biometrics or facial recognition.	No
Will the project result in you making decisions or taking action against individuals in ways which can have a significant impact on them?	Potentially – as part of the support role provided by the hub working arrangement.
Is the project likely to raise privacy concerns or expectations? For example, using health records, criminal records or other information that people would consider to be particularly private.	Potentially – as part of the support role provided by the hub working arrangement.
Will the project require you to contact individuals in ways which they may find intrusive?	Potentially – as part of the support role provided by the hub working arrangement.



## Full Privacy Impact Assessment

This template should be used to record the PIA if the initial assessment says you need to complete a full assessment. You should start to fill in details from the beginning of the project and review this document at regular intervals.

### Step 1: Identify the need for a PIA

Explain what the project aims to achieve, what the benefits will be to the organisation, to individuals and to other parties.

You may find it helpful to link to other relevant documents related to the project, for example a project proposal or plan.

Also summarise why the need for a PIA was identified (you can draw on your answers from the initial assessment form).

Our multi-agency early intervention hub is emerging, with partner support from: police, NCC's locality connectors, Northamptonshire Domestic Abuse Services (NDAS) and through proposals being considered by ENC's Policy and Resources Committee, Groundwork Northamptonshire.

The key objective of the hub is to ensure partners work alongside each other so as to avoid duplication, maximise resource availability and share information in a structured and regulated environment.

As the work of the hub uses personal data and information about children, young people and their families, this PIA is necessary to set out the controls and arrangements required to manage that information.

## **Step 2: Describe the information flow**

You should describe the collection, use and deletion of personal data here. It may also be useful to refer to a flow diagram or another way of explaining data flows. You should also say how many individuals are likely to be affected by the project.

Each partner agency is signed up to a range of Information Sharing Agreements (ISA) for different subject areas. These have been in place across the county for a while. However, it is proposed that once the hub arrangement is fully functional, a specific data sharing protocol and operational requirement is created.

The police and ENC are users of the cloud-based data management system: E-Cins. E-Cins is in place across the county, principally for the management of ASB cases. However, the system has capacity to be extended to other areas of business. All partners working within the hub will be required to subscribe to E-Cins. The system has stringent data management arrangements built in with cases being controlled by the individual case owner.

All of the hub's cases will be managed on E-Cins. Case management meetings involving the partners will take place in the hub environment and records and information created will be stored on the system.

## **Step 3: Consultation requirements**

Explain what practical steps you will take to ensure that you identify and address privacy risks. Who should be consulted internally and externally? How will you carry out the consultation?

You can use consultation at any stage of the PIA process.

The potential privacy risks are identified below and this will be the main control mechanism for managing and mitigation against those risks.

The hub partners will review risks, both with individual cases and as partnership arrangement in general, on an on-going basis.

Each partner has their own data sharing arrangements. However, with regards to the hub working, each partner will be consulted on any required changes and amendments to the governing data protection arrangements for the hub.

On-going advice will be obtained from the council's Data Protection Officer around any necessary changes.

**Step 4: Identify the privacy and related risks**

Identify the key privacy risks and the associated compliance and corporate risks. **Larger scale PIAs should record this information in the council's risk management software and provide a summary here including the risk reference numbers from in phase.**

Please use the questions [below](#) to help you identify the DPA related compliance risks.

<b>Privacy issue</b>	<b>Risk to individuals</b>	<b>Compliance risk</b>	<b>Associated organisation / corporate risk</b>	<b>Solution(s)</b>	<b>Result: is the risk eliminated, reduced or accepted?</b>	<b>Evaluation: is the final impact on individuals a justified, compliant and proportionate response to the aims of the project?</b>	<b>Authorised by:</b>
Young people and or their families refuse consent for their personal information to be used	The hub may not be able to support the person fully, leading to further disruption and complication in their lives.	Non-compliance with Human Rights legislation	Partners may determine that the hub working arrangement is not viable and withdraw support	People are given full access to the privacy statement and arrangements for controlling data	Reduced	Yes	Mike Greenway
Hub partners, individually breach data protection arrangements	Personal information is released inadvertently	Non-compliance with Data Protection, Human Rights legislation	Reputational – ENC hosts the hub arrangement Investigation and fines from ICO	Full training and compliance with the E-Cins Data Management protocol	Reduced	Yes	Mike Greenway

				<p>Full training and awareness of the hub privacy statement</p>			
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				<p>Staff maintain up to date data protection training and are familiar with the processes for reporting a breach internally.</p>			
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## Linking the PIA to the data protection principles

Answering these questions during the PIA process will help you to identify where there is a risk that the project will fail to comply with the DPA or other relevant legislation - for example, the Human Rights Act.

### Principle 1

**Personal data shall be processed fairly and lawfully and, in particular, shall not be processed unless:**

- a) at least one of the conditions in Schedule 2 is met and**
- b) in the case of sensitive personal data, at least one of the conditions in Schedule 3 is also met.**

Have you identified the purpose of the project?

How will you tell individuals about the use of their personal data?

Do you need to amend your privacy notices?

Have you established which conditions for processing apply?

If you are relying on consent to process personal data, how will this be collected and what will you do if it is withheld or withdrawn?

If your organisation is subject to the Human Rights Act, you also need to consider:

Will your actions interfere with the right to privacy under Article 8?

Have you identified the social need and aims of the project?

Are your actions a proportionate response to the social need?

### Principle 2

**Personal data shall be obtained only for one or more specified and lawful purposes and shall not be further processed in any manner incompatible with that purpose or those purposes.**

Does your project plan cover all of the purposes for processing personal data?

Have you identified potential new purposes as the scope of the project expands?

### Principle 3

**Personal data shall be adequate, relevant and not excessive in relation to the purpose or purposes for which they are processed.**

Is the quality of the information good enough for the purpose(s) it is used?

Which personal data could you not use, without compromising the needs of the project?

#### **Principle 4**

**Personal data shall be accurate and, where necessary, kept up to date.**

If you are procuring new software, does it allow you to amend data when necessary?

How are you ensuring that personal data obtained from individuals or other organisations is accurate?

#### **Principle 5**

**Personal data processed for any purpose or purposes shall not be kept for longer than necessary for that purpose or those purposes.**

What retention periods are suitable for the personal data you will be processing?

Are you procuring software that will allow you to delete information in line with your retention periods?

#### **Principle 6**

**Personal data shall be processed in accordance with the rights of data subjects under this Act.**

Will the systems you are putting in place allow you to respond to data subjects rights requests more easily?

If the project involves marketing, have you got a procedure for individuals to opt out of their information being used for that purpose?

#### **Principle 7**

**Appropriate technical and organisational measures shall be taken against unauthorised or unlawful processing of personal data and against accidental loss or destruction of, or damage to, personal data.**

Do any new systems provide protection against any security risks you have identified?

What training and instructions are necessary to ensure that staff know how to operate a new system securely?

#### **Principle 8**

**Personal data shall not be transferred to a country or territory outside the European Economic Area unless that country or territory ensures and adequate level of protection for the rights and freedoms of data subjects in relation to the processing of personal data.**

Will the project require you to transfer data outside of the EEA?

If you will be making transfers, how will you ensure that the data is adequately protected?

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### Step 5: Integrate the PIA outcomes back into the project plan

Who is responsible for integrating the PIA outcomes back into the project plan and updating any project management paperwork? Who is responsible for implementing the solutions that have been approved? Who is the contact for any privacy concerns that may arise in the future?

Action to be taken	Date for completion of actions	Responsibility for action
Privacy Statement developed and reviewed regularly	In place by 1.4.19 First review: 30.9.19	Mike Greenway
Training on E-Cins system for all hub-based officers from partner agencies	On-going from 1.4.19	Mike Greenway

Contact point for future privacy concerns

Kirsty Squires – Data Protection Officer