

Council Plan 2018-2022

Equality analysis

November 2018

Guidance notes

Things to remember:

Under the Public Sector Equality Duty (PSED) public authorities are required to have due regard to the aims of the general equality duty when making decisions and when setting policies.

Understanding the affect of the council's policies and practices on people with different protected characteristics is an important part of complying with the general equality duty. Under the PSED the council must ensure that:

- Decision-makers are aware of the general equality duty's requirements.
- The general equality duty is complied with before and at the time a particular policy is under consideration and when a decision is taken.
- They consciously consider the need to do the things set out in the aims of the general equality duty as an integral part of the decision-making process.
- They have sufficient information to understand the effects of the policy, or the way a function is carried out, on the aims set out in the general equality duty.
- They review policies or decisions, for example, if the make-up of service users changes, as the general equality duty is a continuing duty.
- They take responsibility for complying with the general equality duty in relation to all their relevant functions. Responsibility cannot be delegated to external organisations that are carrying out public functions on their behalf.
- They consciously consider the need to do the things set out in the aims of the general equality duty not only when a policy is developed and decided upon, but when it is being implemented.

Best practice guidance from the Equality and Human Rights Commission recommends that public bodies:

- Consider all the [protected characteristics](#) and all aims of the general equality duty (apart from in relation to marriage and civil partnership, where only the discrimination aim applies).
- Use equality analysis to inform policy as it develops to avoid unnecessary additional activity.
- Focus on the understanding the effects of a policy on equality and any actions needed as a result, not the production of a document.
- Consider how the time and effort involved should relate to the importance of the policy to equality.
- Think about steps to advance equality and good relations as well as eliminate discrimination.
- Use good evidence. Where it isn't available, take steps to gather it (where practical and proportionate).
- Use insights from engagement with employees, service users and others can help provide evidence for equality analysis.

Equality analysis should be referenced in community impact statements in Council reports. Community impact statements are a corporate requirement in all reports to the following meetings: the cabinet, individual decision makers, scrutiny, regulatory committees and community councils. Community impact statements enable decision makers to identify more easily how a decision might affect different communities in Southwark and to consider any implications for equality and diversity.

The public will be able to view and scrutinise any equality analysis undertaken. Equality analysis should therefore be written in a clear and transparent way using plain English. Equality analysis may be published under the council's publishing of equality information, or be present with

divisional/departmental/service business plans. These will be placed on the website for public view under the council's Publications Scheme.

Equality analysis should be reviewed after a sensible period of time to see if business needs have changed and/or if the effects that were expected have occurred. If not then you will need to consider amending your policy accordingly. This does not mean repeating the equality analysis, but using the experience gained through implementation to check the findings and to make any necessary adjustments.

Engagement with the community is recommended as part of the development of equality analysis. The council's Community Engagement Division and critical friend, the Forum for Equality and Human Rights in Southwark can assist with this (see section below on community engagement and www.southwarkadvice.org.uk).

Whilst the equality analysis is being considered, Southwark Council recommends considering health and wellbeing implications, as health and health inequalities are strongly influenced by the environment we live and work in. As a major provider of services to Southwark residents, the council has a legal duty to reduce health inequalities and this is reflected in its values and aims. For this reason, the council recommends considering health & wellbeing impacts in all equality analyses, not forgetting to include identified potential mitigating actions.

Section 1: Equality analysis details

Proposed policy/decision/business plan to which this equality analysis relates		Council Plan 2018/19 – 2021-22			
Equality analysis author		Matthew Little			
Strategic Director:		Eleanor Kelly			
Department		Chief Executive's	Division	Chief Executive's Office	
Period analysis undertaken		June 2018 to November 2018			
Date of review (if applicable)		<p>The council plan as the overarching business plan will be subject to regular monitoring, including annual review. Individual commitments that make up the plan, and associated equalities analysis, will be reviewed in accordance with this and other local service business planning arrangements. Commitments will be achieved at differing timescales and will be subject to relevant analysis at the appropriate pre-implementation stage and subsequently in line with local service planning arrangements. As such, much of the detailed equality analysis and analysis of impact will be addressed through local services plans and relevant documentation.</p>			
Sign-off	Stephen Gaskell	Position	Head of Chief Executive's	Date	November 2018

Section 2: Brief description of policy/decision/business plan

1.1 Brief description of policy/decision/business plan

The Council Plan is the Council's overarching business plan. A draft Council Plan for 2018/19 to 2021/22 was agreed by Cabinet for consultation in June 2018. The Council Plan describes how we will deliver the Fairer Future vision through the promises and commitments made to the people and communities of Southwark. It also makes a number of commitments to equality and fairness in line with our approach to equality.

As a Council we are committed to taking steps to ensure that we meet our commitments under the Public sector equality duty. This means that we will pay due regard to:

- Eliminating discrimination, harassment and victimisation
- Advancing equality of opportunity, including finding out about and meeting diverse needs of our local communities, addressing disadvantage and barriers to equal access; enabling all voices to be heard in our engagement and consultation undertaken
- Fostering good community relations; to be a borough where all feel welcome, included, valued, safe and respected.
- To be a borough which tackles prejudice and promotes celebration and understanding of the rich diversity of its communities
- To be a borough where your background does not determine your life chances.

The Council Plan will impact what every council team and member of staff does, meaning that we will all work together to achieve our shared goals. We will be transparent and accountable about our progress in delivering the Council Plan. We will produce an annual performance report at the end of each financial year and will communicate progress through our website and our Southwark Life magazine.

Section 3: Overview of service users and key stakeholders consulted

2. Service users and stakeholders	
<p>Key users of the department or service</p>	<ul style="list-style-type: none"> • All residents • Businesses and business organisations in Southwark • Partners of the Council • Faith groups • Sports clubs • Charities, all organisations working to support young, old and vulnerable residents, and volunteers • Community leaders and those who help look after their local areas • Visitors to the borough
<p>Key stakeholders were/are involved in this policy/decision/business plan</p>	<p>The “Southwark Conversation”, running from 19 October to 24 December 2017, was a conversation with communities about wellbeing and the future of the borough. The conversation drew on a range of engagement methods to generate 2,923 individual responses, representing the largest borough wide response of its type. Initial findings were presented to Cabinet in March 2018 and further, more detailed analysis was presented in July, which has directly fed into the development of the Council Plan, meaning the feedback from the Southwark Conversation has shaped priorities.</p> <p>The Council Plan closely reflects the contents of the Southwark Labour manifesto which had wide public engagement during the local elections in May 2018.</p> <p>In accordance with the council’s constitution and budget and policy framework, the draft Council Plan and proposals within it have been subject to public consultation. The draft Council Plan was published on the council’s online consultation hub on 28 June 2018 and the consultation ran for nine weeks, closing on 31 August 2018.</p> <p>The draft Council Plan has also been reviewed by the Forum for Equality and Human Rights (FEHRS) in Southwark’s “Equality and Human Rights Panel” (EHRP), an external panel chaired by Citizen’s Advice Bureau. FEHRS is funded by the Council to act as a critical friend to the council on our delivery of equality and were consulted on how to further embed equality into the Council Plan. Comments received from EHRP will also be included in the Council’s revised Approach to Equality.</p> <p>Following the adoption of the Council Plan by council assembly, the council will continue to engage with local people to implement the commitments set out in the Plan. We will continue to engage on the plan over the next four years.</p>

Section 4: Pre-implementation equality analysis

<p>Age - Where this is referred to, it refers to a person belonging to a particular age (e.g. 32 year olds) or range of ages (e.g. 18 - 30 year olds).</p>
<p>Possible impacts (positive and negative) of proposed policy/decision/business plan</p>
<p>The commitments in the Council Plan will have a range of impacts on people of all ages in the borough. For older people, a review of the impacts of our Age Friendly borough action plan will ensure that we are meeting our ambitions in this regard and two new nursing homes will provide additional high quality care to elderly residents. Extra care housing will be built to accommodate older people who require a degree of support and we will raise standards with a Residential Care Charter to make sure that all council commissioned residential care homes are rated as good or outstanding and residents are satisfied with the care they receive. A loneliness prevention strategy will aim to tackle this important public health challenge, and help those elderly residents, among others, who experience loneliness to improve their health and wellbeing.</p> <p>New safe pedestrian crossings, including at the junction of Lordship Lane and Dulwich Common, will improve access for residents and a network of accessible toilets (and baby changing facilities) will allow residents and visitors to easily locate current toilet provision. Fifty new facilities will be also be implemented across the borough to increase accessibility. While these new facilities will benefit all, they will have a positive impact on older people, as evidence suggests individuals are more likely to suffer from conditions such as incontinence, urgency and prostate problems as they age.</p> <p>Digital skills can be a barrier for some of our residents, including the elderly, and we are committed to ensuring that all of our residents benefit from opportunities to take advantage of the digital revolution. We want to make sure that no-one is left behind and we will work with partners and stakeholders to support residents to gain basic digital skills.</p> <p>Air quality affects health, particularly our youngest and oldest residents. To help tackle the air pollution problems around schools and encourage more sustainable modes of travel we have made a commitment to make walking fun, safe and accessible by developing a green walking network. We will also close roads around schools at drop off and collection time and get more children walking and cycling to school.</p> <p>For young people, we will work with communities to find local solutions that help young people stay away from knives. The Blue Youth Club and Community Centre in Bermondsey will be re-opened to provide increased opportunities for community activities and a positive Futures Fund will be launched to support groups which provide inspiring opportunities for young people.</p> <p>The challenge to be a full employment borough includes ambitious targets (5,000 jobs and 2,500 apprenticeships) to support people of all working age into fairly paid and sustainable employment. The new Southwark Works framework, which is the council’s longstanding employment support programme, contains provision for employment support for all ages including vulnerable young people and older people (50+). On top of this is a commitment to support 500 young people from low income backgrounds into paid internships so that they can</p>

benefit from opportunities and work placements with a range of good employers throughout London.

The provision of appropriate GPs, school places and parks to support residents is a key council plan commitment. For school places, in addition to the new Charter School East Dulwich, there will be a new secondary school opened at Borough in response to the increasing number of children in the local area requiring secondary school places and a predicted shortage of places within Southwark from 2019 onwards. In terms of primary places, there will be a new primary school in Rotherhithe to address local needs in the medium to long term.

Performance wise, we have worked with schools to drive up standards and help ensure that all children and young people in the borough have the opportunity to reach their potential. Building on this track record, the council plan will make sure all schools in Southwark are Good or Outstanding and they are exceeding London averages at every stage.

Free theatre visits for every primary school child every year will have a positive impact on young people and provide schoolchildren with access to a rich cultural offer no matter what their background.

Recognising the financial burden of childcare costs for many of our residents, we will help parents to spread the costs of childcare over a longer period of time by introducing an affordable childcare loan scheme. We will also extend free healthy school meals to nurseries will provide nursery children with a healthy meal while increasing social mobility and saving money for families.

Equality information on which above analysis is based

- [Healthy People in Healthy Places – Annual Public Health Report of the Director of Health and Wellbeing 2017](#)
- [Our Borough 2018, Public Health summary for Southwark](#)
- [Protected characteristics JSNA 2017](#)
- [Air Quality JSNA 2017](#)
- [Southwark Works Equalities Analysis](#)
- [Economic Wellbeing Strategy 2017-2022](#)
- [Primary and Secondary School Place Planning Strategy Update](#)
- [Skills Strategy \(and Equalities Analysis\)](#)

Mitigating actions to be taken

Council Plan commitments will have equality analysis undertaken at the relevant pre-implementation stage.

Disability - A person has a disability if s/he has a physical or mental impairment which has a substantial and long-term adverse effect on that person's ability to carry out normal day-to-day activities.

Possible impacts (positive and negative) of proposed policy/decision/business plan

Many of the commitments will positively impact on disabled people in the borough. The Southwark Works service has a potential positive impact on people with disabilities and health conditions. However, data analysis has suggested more could be done to support people with disabilities into employment. Therefore under the new Southwark Works model, people with disabilities will be able to better access support through any part of the new Framework, with specific lots being designed for people with disabilities, for example a focus on mental health and physical and learning Disabilities. There will also be provision for young people with SEND in the 'vulnerable young persons' lot. In addition, other providers will engage and work with employers to secure vacancies for any client and ensure recruitment policies are inclusive; specifically with the needs of potential and current employees with disabilities.

Mental health problems represent the single largest cause of disability in the UK and it is estimated that almost one in five adults in Southwark are experiencing a common mental disorder, equating to approximately 47,000 individuals. The prevalence of severe mental illness in Southwark is 1.4% (approximately 3,800 patients) and severe mental illness disproportionately affects male, older and black ethnic population groups. To this end, there are specific commitments to protect adult mental health services and protect funding for mental health services for children and young people – also trying to find ways to change and improve services so that more children get the support they need when they need it. As an employer, the council will train appropriate staff to be mental health first aiders, including senior managers, and work with partners to develop an ongoing Council-wide mental health awareness and stigma programme for all staff. We will also work with a range of community stakeholders, including voluntary and community sector organisations and businesses, to deliver a community training offer which builds local capacity and promotes mental health.

In Southwark, 17% of school children have been identified as having special educational needs and disabilities (SEND). This equates to 8,145 children and means that Southwark has the 5th highest prevalence out of 33 London boroughs. Recognising the need to provide excellent and much needed SEND provision to Southwark, two special schools will be developed and launched – Cherry Garden School in Bermondsey and Beormund at Borough.

The Council's free swim and gym offer means that disabled residents can use any of the borough's leisure centres for free at any time - this helped to achieve a significant increase in the number of visits in 2017/18 from the previous year. Registrations and user data will continue to be monitored as the council commits to driving up participation amongst disabled residents whilst making free swim and gym even more flexible for all users.

Equality information on which above analysis is based

<ul style="list-style-type: none"> • Southwark Works Equalities Analysis • Health and Wellbeing in Southwark – Joint Strategic Needs Assessment (Mental Health 2017) • Southwark Council Interim Performance Report 2014-2018 • Protected characteristics JSNA 2017 • Special Educational Needs & Disabilities JSNA 2018
<p>Mitigating actions to be taken</p>
<p>Council Plan commitments will have equality analysis undertaken at the relevant pre-implementation stage.</p>

<p>Gender reassignment - The process of transitioning from one gender to another.</p>
<p>Possible impacts (positive and negative) of proposed policy/decision/business plan</p>
<p>The commitment to tackle all forms of hate crime is reinforced by adopting a zero tolerance approach in this council plan; this includes the launch of a hate-crime awareness-raising communications campaign and the ‘Stronger Southwark’ communities project fund for first round of applications.</p> <p>Other positive impacts include:</p> <ul style="list-style-type: none"> • Review of the diversity standard and promotion of diversity in the borough. <p>Important to note that the Council has specific commitments in the Council’s Workforce Plan in relation to development of guidance for managers re: gender identity. The Council will also consider recommendations arising from central government’s recent consultation on the Gender Recognition Act 2004.</p>
<p>Equality information on which above analysis is based.</p>
<p>The Council will be reviewing current equality monitoring analysis information collected, including revision of current equality monitoring categories. This will also include any recommendations arising from central government’s recent consultation on the Gender Recognition Act 2004.</p>
<p>Mitigating actions to be taken</p>
<p>Council Plan commitments will have equality analysis undertaken at the relevant pre-implementation stage.</p>

Marriage and Civil Partnership - In England and Wales marriage is no longer restricted to a union between a man and a woman but now includes a marriage between a same-sex couple. Same-sex couples can also have their relationships legally recognised as 'civil partnerships'. Civil partners must not be treated less favourably than married couples and must be treated the same as married couples on a wide range of legal matters. **(Only to be considered in respect to the need to eliminate discrimination).**

Possible impacts (positive and negative) of proposed policy/decision/business plan

None identified at this stage.

Equality information on which above analysis is based

Mitigating actions to be taken

Council Plan commitments will have equality analysis undertaken at the relevant pre-implementation stage.

Pregnancy and maternity - Pregnancy is the condition of being pregnant or expecting a baby. Maternity refers to the period after the birth, and is linked to maternity leave in the employment context. In the non-work context, protection against maternity discrimination is for 26 weeks after giving birth, and this includes treating a woman unfavourably because she is breastfeeding.

Possible impacts (positive and negative) of proposed policy/decision/business plan

Creating a network of accessible toilets and baby changing facilities will positively impact those with caring responsibilities for babies and toddlers who will have greater access to toilet and changing facilities.

Although outside of the 'maternity' definition, it is recognised that the period away from work owing to pregnancy and childcare are a contributory factor to the gender pay gap. We are committed to promoting family-friendly employment policies through our own commissioning, and more widely and we aim to make Southwark the first Equal Pay Borough so all our contractors must publish their gender pay gap and plans to reduce it.

Equality information on which above analysis is based

- [Southwark Works Equalities Analysis](#)
- [Protected characteristics JSNA 2017](#)
- [Economic Wellbeing Strategy 2017-2022](#)

Mitigating actions to be taken

Council Plan commitments will have equality analysis undertaken at the relevant pre-implementation stage.

Race - Refers to the protected characteristic of Race. It refers to a group of people defined by their race, colour, and nationality (including citizenship) ethnic or national origins.

Possible impacts (positive and negative) of proposed policy/decision/business plan

There are a range of potential impacts related to race. In housing terms, the proportion of people in the social housing sector who are BAME is greater than their representation in the borough as a whole. This population group may be disproportionately affected by any regeneration that targets areas with higher concentrations of social housing. To tackle this and the wider issues of social regeneration, are a number of council plan commitments to make sure that growth is inclusive and that residents health and wellbeing is enhanced. Any developments on council owned land must have at least fifty percent council rented homes and there must be a right to return for council tenants and resident leaseholders so local people can stay in the borough they call home. In addition, if estates need to be redeveloped, there will be an increase in the number of council homes which will be built to the highest standards. Ballots will also be introduced on any new estate regeneration along with a Consultation Charter to ensure local residents can hold private sector developers to account. For specific sites such as the Ledbury Estate the council has committed to securing the future of the estate with no reduction in the number of council homes. At the Aylesbury Estate, a new library and GP Health Centre will be built and funds secured to support residents through the regeneration.

The commitment to tackle all forms of hate crime is reinforced by adopting a zero tolerance approach in this council plan; this includes the launch of a hate-crime awareness-raising communications campaign and the 'Stronger Southwark' communities project fund for first round of applications.

Southwark has one of the highest rates of sexually transmitted infections (STIs) and HIV in the country. With over 8,000 new STI diagnoses each year, Southwark has almost double the London rate. Southwark also has the second highest HIV prevalence in England: there are just over 2,500 people living in the borough who have been diagnosed with HIV. We will continue to tackle HIV stigma and increase testing and engage residents in the Testing Faith programme, which aims to tackle HIV stigma specifically in BAME communities.

To promote Southwark's diversity and cultural richness we will review the diversity standard and the promotion of diversity in the borough. We will also support a range of cultural celebrations across the borough and support independent food businesses which reflect the diversity of our community.

The Southwark Works service has a potential positive impact on all ethnicity groups and people from any background will be able to access employment support via any of the Framework providers. However, qualitative and quantitative data analysis has suggested the ethnicity groups who could benefit more from employment support services and where the implementation of the service should focus. An evaluation of the current service users has shown that 70.8% of clients registering with the Southwark Works service identify as from a BAME background.

Equality information on which above analysis is based

- [Protected characteristics JSNA 2017](#)
- [Our Borough 2018 Public Health summary for Southwark](#)
- [Equality Analysis – Southwark Housing Strategy to 2043](#)
- [Southwark Works Equalities Analysis](#)
- [Cultural Strategy](#)

Mitigating actions to be taken

Council Plan commitments will have equality analysis undertaken at the relevant pre-implementation stage. This will include secondary research and engagement with local community and voluntary organisations to find out about needs to help inform services.

Religion or belief - Religion has the meaning usually given to it but belief includes religious and philosophical beliefs including lack of belief (e.g. Atheism). Generally, a belief should affect your life choices or the way you live for it to be included in the definition.

Possible impacts (positive and negative) of proposed policy/decision/business plan

A number of council plan commitments will have a positive impact on fostering good community relations, including:

- Working alongside our communities to help them counter extremism and radicalisation.
- Having a zero tolerance approach to hate crime and launching a hate-crime awareness-raising communications campaign and the ‘Stronger Southwark’ communities project fund for first round of applications.
- Enhancing and refreshing the Faith Strategy and action plan.
- Promoting Southwark’s diversity and cultural richness.
- Supporting a range of cultural celebrations across the borough.

Equality information on which above analysis is based

<ul style="list-style-type: none"> • Protected characteristics JSNA 2017 • Census 2011 data on Faith and Religion <p>As part of the proposed review of equality monitoring information collected and analysed, the Council will aim to improve collection of equality monitoring information re: religion/belief where relevant, in order to help provide appropriate service provisions in relation to specific needs arising from a person’s religion or belief.</p>
<p>Mitigating actions to be taken</p>
<p>Council Plan commitments will have equality analysis undertaken at the relevant pre-implementation stage. This will include secondary research and consultation and engagement with local community and voluntary organisations to find out about needs to help inform services.</p>

<p>Sex - A man or a woman.</p>
<p>Possible impacts (positive and negative) of proposed policy/decision/business plan</p>
<p>We are committed to promoting equal opportunities employment policies through our own commissioning, and more widely and we aim to make Southwark the first Equal Pay Borough so all our contractors must publish their gender pay gap and plans to reduce it.</p> <p>Through the Council Plan and Economic Wellbeing Strategy there is an ambition that there is genuine pay equality in Southwark and for Southwark residents, and we continue to embed the principles of equal pay and family friendly work practices across all our services and promote, influence strategically, and lobby nationally for fair wages and the elimination of the gender pay gap. We will deliver a Good Work campaign that focuses on fair pay, equality and good work and the new Southwark Works Framework will have a new focus on supporting people into better work. Anecdotal evidence suggests that there are more women in need of this support than men and engagement and outreach of clients will target women.</p> <p>A lot of good work to better support people who experience domestic abuse has taken place in Southwark, but the case for change is still strong and we will review and develop our Sanctuary Scheme to better prioritise domestic abuse survivors over their abuser so they can stay in their own home.</p> <p>We will also develop of a Violence Against Women and Girls strategy to tackle all forms of gender based violence.</p>
<p>Equality information on which above analysis is based</p>

<ul style="list-style-type: none"> • Protected characteristics JSNA 2017 • Southwark Domestic Abuse Strategy • Economic Wellbeing Strategy 2017-2022 • Southwark Works Equalities Analysis • Domestic Abuse Strategy 2015-2020
<p>Mitigating actions to be taken</p>
<p>Council Plan commitments will have equality analysis undertaken at the relevant pre-implementation stage.</p>

<p>Sexual orientation - Whether a person's sexual attraction is towards their own sex, the opposite sex or to both sexes</p>
<p>Possible impacts (positive and negative) of proposed policy/decision/business plan</p>
<p>Research from the Office for National Statistics suggests that Southwark has one of the largest gay and lesbian populations in the country, where 5% (12,000 people) of the population of Southwark identify as being gay or lesbian, compared to only 2% of the entire London population and 1% in England. Estimates of those identifying as either bisexual, transgender are not considered reliable enough for practical use.</p> <p>Council Plan commitments likely to have positive impacts include:</p> <ul style="list-style-type: none"> • Review of the diversity standard and promotion of diversity in the borough. • Have zero-tolerance of hate crime; this includes the launch of a hate-crime awareness-raising communications campaign and the 'Stronger Southwark' communities project fund for first round of applications.
<p>Equality information on which above analysis is based</p>
<p>Mitigating actions to be taken</p>
<p>Council Plan commitments will have equality analysis undertaken at the relevant pre-implementation stage. This will include secondary research and engagement with the Southwark LGBTQI+ community forum to find out about local needs to help inform services.</p>

Human Rights

There are 16 rights in the Human Rights Act. Each one is called an Article. They are all taken from the European Convention on Human Rights. The Articles are The right to life, Freedom from torture, inhuman and degrading treatment, Freedom from forced labour, Right to Liberty, Fair trial, Retrospective penalties, Privacy, Freedom of conscience, Freedom of expression, Freedom of assembly, Marriage and family, Freedom from discrimination and the First Protocol

Potential impacts (positive and negative) of proposed policy/decision/business plan

Our commitment to equality and fairness runs throughout this plan, both in the commitments we make to the people of Southwark, and the way we deliver services every day. As a council we are committed to taking all necessary steps to meet our commitments to equalities under the Public Sector Equality Duty, including regularly reporting back to the public so they can hold us to account.

No specific Human Rights impacts have been identified.

Information on which above analysis is based**Mitigating actions to be taken**

Council Plan commitments will have equality analysis undertaken at the relevant pre-implementation stage.

Section 5: Further actions and objectives

The Council Plan is the council's overall business plan made up of a series of individual commitments grouped into eight priority themes that will be delivered over the four year period to 2021/22. Commitments will be achieved at differing timescales and will be subject to relevant analysis at the appropriate pre-implementation stage and subsequently in line with local service planning arrangements. As such, the detail of this section will be set out through local business plans and other such supporting material.
