
Decision Maker: EXECUTIVE

Meeting Date

Date: For Pre-Decision Scrutiny by the Children, Education and Families Portfolio on Tuesday 15 June 2021

Decision Type: Non-Urgent Executive Non-Executive Non-Key

Title: COMMISSIONING STRATEGY AND PROCEEDING TO PROCUREMENT: DOMESTIC VIOLENCE AGAINST WOMEN AND GIRLS SERVICES

Contact Officer: Rachel Dunley, Head of Service for Early Intervention and Family Support
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Chief Officer: Director of Children's Services

Ward: (All Wards);

1. Reason for report

- 1.1 The Council holds a contract with Bromley and Croydon Women's Aid for the delivery of a range of support services to women and girls at risk of, or who have suffered, domestic violence and abuse ('DVA'). The contract is wholly grant funded and continuation of the service is dependent upon confirmation of recurrent grant funding.
- 1.2 A one-year contract commenced on 1st April 2020, with an option to extend for a further two years. The contract length was set so that it aligned with grant funding arrangements at that time. The estimated annual value was £179K and an estimated whole life value of £546K
- 1.3 Grant funding for 2021/2022 was confirmed for one year only and Approval (CEF20015) to extend the contract for one year was granted. In addition, the contract was varied to reduce the scope of the requirement. This reduced the annual contract value by an estimated £30k.
- 1.4 This report seeks authorisation from the Portfolio Holder for Children and Families to proceed to tender for this service at an estimated cost of £150k per annum for a total potential period of up to five years on a 1 + 3 + 1 year model (1+3+1) with a total cost of £750k.
- 1.5 As per the council's procurement rules any tender over £500k needs to be authorised by the Portfolio Holder.

2. RECOMMENDATION(S)

- 2.1 The Portfolio Holder is recommended to approve proceeding to a competitive tender for the provision of the Domestic Violence Against Women and Girls preventative services.
- 2.2 The proposed tender would be for a total of five years (1 +3 + 1) at an estimated cost of £150k per annum with a total proposed value of £750k. This period has been chosen to align to the anticipated grant funding arrangements and is subject to confirmation of the supporting grant.

Impact on Vulnerable Adults and Children

1. Summary of Impact:
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Corporate Policy

1. Policy Status: Not Applicable Existing Policy New Policy: Further Details
 2. BBB Priority: Children and Young People Excellent Council Quality Environment Safe Bromley Supporting Independence Vibrant, Thriving Town Centres Healthy Bromley Regeneration Not Applicable: Further Details
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Financial

1. Cost of proposal: £150,000
 2. Ongoing costs: £150,000
 3. Budget head/performance centre: 132569
 4. Total current budget for this head: £206K
 5. Source of funding: MOPAC (LCPF) Grant
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Personnel

1. Number of staff (current and additional):
 2. If from existing staff resources, number of staff hours:
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Legal

1. Legal Requirement: Statutory Requirement Non-Statutory - Government Guidance None: Further Details
 2. Call-in: Applicable Not Applicable: Further Details
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Procurement

1. Summary of Procurement Implications:
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Customer Impact

1. Estimated number of users/beneficiaries (current and projected):
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Ward Councillor Views

1. Have Ward Councillors been asked for comments? Yes No Not Applicable
2. Summary of Ward Councillors comments:

3. COMMENTARY

- 3.1 Responding to domestic violence and abuse is a complex and multi-faceted issue that touches many people's lives in many different ways. Domestic violence is like no other crime insofar as the perpetrator has intimate and constant access to the victim. Domestic violence and abuse are experienced by adults and children from all backgrounds, and many domestic incidents remain unreported and often result in devastating consequences for long term mental and physical health.
- 3.2 Domestic abuse is considered a gendered crime. We focus on the needs of women and girls due to the disproportionate impact of domestic violence and abuse crimes on women and girls. Almost 1 in 3 women aged 16-59 will experience domestic abuse in her lifetime. (ONS 2019) According to the Crime Survey for England and Wales 2019, an estimated 1.6 million women (7.5%) and 3.8% of men experienced domestic abuse in the last year (year ending March 2019). Women are more likely to experience higher rates of repeated victimisation and are more likely to be seriously hurt or killed than male victims of domestic abuse (ONS 2019) They are also more likely to be subjected to coercive and controlling behaviours and experience higher levels of fear. In the year ending March 2019, the majority of defendants in domestic abuse-related prosecutions were men (92%) and the majority of victims were female (75%).
- 3.3 The Crime and Disorder Act 1998 places a statutory requirement on local authorities to monitor the level of domestic abuse in their communities and establish partnerships, in order to reduce the problem as well as work together with other agencies to highlight the issue and coordinate a response.
- 3.4 Domestic abuse costs society an estimated £15.7bn per year. Domestic abuse has a significant impact on a wide range of services including housing, criminal justice and social service provision. Nationally, violent crime figures show that despite a long downward trend in violent crime, domestic abuse remains a widespread problem which affects more than 8.5% of women and 4.5% of men every year, two women are killed every week in England and Wales by a current or former partner. The Home Office's 'The Economic and Social Costs of Domestic Abuse' Research Report dated January 2019 suggests (p.6) that the total cost of domestic abuse in England and Wales for 2016/17 including economic and social costs, reached a staggering £66bn with a unit cost of £34,015. The report further suggests that whilst the £66bn cost appears large, it is most likely an under-estimate.
- 3.5 VAWG services were commissioned and approved by the Children Education and Families Portfolio Holder on 09 October 2019 to deliver an Independent Domestic and Sexual Violence Advocate (IDSV) service, Community Domestic Abuse Projects and a Perpetrator Programme and the current contract ends on the 31st March 2022.
- 3.6 In March 2021 Bromley joined with Sutton and Croydon, and the Metropolitan Police Southern BCU and successfully bid for a new perpetrator programme, DRIVE. This is separately funded via MOPAC and one element of this funding comes into the local authority to be used to enhance the existing IDVA provision to support the DRIVE programme. MOPAC ringfenced funding for DRIVE has been confirmed until 31st March 2022.
- 3.7 The London Assembly state that "recorded domestic abuse offences across London have significantly risen in recent years. Since 2011/12 domestic abuse related incidents recorded by Metropolitan Police Service have increased year by year. The Police recorded a total of 1,316,800 domestic abuse related incidents and crimes in the year ending March 2019. 746,219 of these were recorded as domestic abuse related crimes which is an increase of 24% from the previous year. During the first Covid-19 lockdown, the Metropolitan Police reported that its officers were arresting around 100 people a day for domestic abuse offences. Overall domestic abuse incidents are reported to increase by 3% year by year. Between June 2019 and May 2020 there were 4,776 domestic abuse incidents in Bromley and 3,037 domestic abuse offences. There has been an increasing prevalence of incidents in Bromley over the last three years which can be seen in the data in appendix 1.
- 3.8 In February 2017, the Prime Minister announced plans for work to transform the way we think about and tackle domestic abuse leading to the introduction of a new Domestic Abuse Bill, which was re-affirmed in the Queen's Speech in June 2017, and resulted in the publication of the Transforming the Response to Domestic Abuse Consultation Response and Draft Bill in January 2019.

- 3.9 The Local Government Association outlined in their briefing report 'The cost of Domestic Abuse: the financial cost to Local Government' the strong relationship between domestic abuse and key local government services and the fiscal cost to local government. This suggests a need to focus on domestic abuse and invest in co-ordinated multi-agency and community response that focuses on people's experience of domestic abuse and supports the individual and their families. It will reduce pressure on costs in the long term. On the 6th November 2019, Parliament was dissolved due to the general election taking place in December 2019. The government's response to the domestic abuse consultation set out 123 commitments to help tackle domestic abuse with the majority of these commitments not requiring legislation. In December 2019, the government was elected with a manifesto commitment to "Support all victims of domestic abuse and pass the Domestic Abuse Bill." The bill aims to ensure that victims have the confidence to come forward and report their experiences, safe in the knowledge that the state will do everything it can to support them and their children and pursue the abuser. (www.gov.uk) The bill completed its report stage and third reading (6 July 2020) and was voted through by the House of Commons. It has now been voted through by the House of Lords (28 April 2021) and is currently awaiting Royal Assent before it becomes law.
- 3.10 The table below shows information taken from the LGA report referred to in 3.8 and gives an estimate of the cost of domestic abuse across three local government services. The unit cost is taken from the New Economy Foundation Unit Cost Calculator and is calculated as a cost per incident. The cost of Domestic Abuse: the financial cost to Local Government (briefing paper)' shows the strong relationship between domestic abuse and the fiscal costs to local government services.

Fiscal cost to Bromley	Unit Cost (2016/2017) £	Recorded Incidents	Total Cost £000
Children's Social Care	193	4,426	854
Adult Social Care	193	4,426	854
Housing	110	4,426	487
Total			2,195

- 3.11 Preventative services and the evidence summarised in this section, makes a strong financial case for the need to continue to invest in specialist support services as well as targeted training and resources for frontline staff, in order to reduce the extent of domestic abuse. Reducing funding to specialist services should not be seen as necessary or unavoidable cost saving. The evidence of independent reports shows this would be a false economy, not just in terms of the quality of the service and support that is offered to our local communities, but also in financial cost to the London Borough of Bromley.
- 3.12 This will ultimately reduce the pressure on, and costs to, statutory public services. If support services are reduced and domestic abuse continues to increase the demand for services such as housing, adult and children's social care increase in direct proportion.
- 3.13 Domestic abuse sits within an increasing body of legislation, policy and guidance that is applicable to victims, perpetrators and children. The Crime and Disorder Act 1998 places a duty on local authorities and the police to work together with other agencies to tackle crime at a local level through the provision of a Community Safety Strategy that should include domestic abuse. The police are key partners in multi-agency domestic abuse groups that have been established in most areas to develop inter-agency responses to domestic abuse and improve service provision across agencies such as health services, specialist domestic abuse services (refuges and outreach services), housing authorities and many other statutory and voluntary sector agencies.

3.14 Following an open tender in 2019 the VAWG commissioned services have been carried out by Bromley and Croydon's Women's Aid (BCWA). The contract commenced on 1st April 2020 and the following services are currently provided under the contract:

- **Independent Domestic Violence Advisor Service ('IDVA')**

- **CSU and Community IDVA** – One IDSVA is based with the Community Safety Unit (CSU) offering a specialist support service to police staff and the high risk domestic/sexual abuse cases they work with.
- **Young Person IDVA** – This IDVA will support 16-17 year old victims of domestic abuse. The Young Person's IDVA works with the Leaving Care Team and with schools and youth clubs. In addition the post co-locates with the Children Early Intervention Team.
- **Specialist Adult Support IDVA** – This IDSVA provides specialist support to vulnerable and elderly victims of domestic violence; nearly half of elderly victims of domestic abuse also have a disability. The IDSVA links in and is a single point of contact for the Adult Early Intervention Team, substance misuse and mental health teams to support service users with complex additional needs.

- **Community Domestic Abuse Projects**

- The *One Stop Shop* is a free and confidential service for victims and survivors of domestic abuse offering services under one roof.
- *Victim/survivor support groups* are approximately a 12 week course with the overarching aim to help women who have experienced domestic violence make sense of and understand what has happened to them and to recognise potential future abusers.

3.15 Domestic abuse impacts on the entire community, individuals of all genders, the young and old, and families with and without children. This contract supports all victims of domestic abuse through direct support or signposting to specialist providers where required.

3.16 These services are funded by the Mayor's Office for Police and Crime (MOPAC) as part of the London Crime Prevention Fund (LCPF). The LCPF also fund projects across Community Safety.

3.17 In an addition a collaborative agreement relating to the Home Office and the MOPAC funded 'DRIVE South BCU' programme was signed and agreed by London Borough of Bromley alongside the boroughs of Croydon and Sutton, following a successful 1 year pilot in Croydon. The DRIVE programme is designed to tackle high harm perpetrators of domestic abuse and replaces the previously commissioned DVIP intervention. The ringfenced grant funding enhanced the IDVA provision has been received and BCWA have recruited an additional IDVA.

3.18 **SUMMARY OF THE BUSINESS CASE**

- I. This contract is funded by MOPAC's LCPF grant. The usual MOPAC funding model has been a four year award cycle split into two blocks of two years. The local authority would normally bid for this funding outlining the full proposal for the four years. At the end of Year2, the local authority would normally submit an updated bid in order to release the final two years of the ear-marked funding.
- II. This year, MOPAC changed the model and issued a 1 year funding settlement (01 April 2021 to 31 March 2022). This change was due to the exceptional circumstances of the COVID19 Pandemic. We have not been formally advised what the new model of funding will be for 01 April 2022 onwards but there are indications that it will return to a 4 year settlement but due to the London Mayoral Elections, this cannot be guaranteed.

- III. The new DRIVE programme is separately funded by MOPAC until 31 March 2022. There has not yet been clarity about the grant settlement for DRIVE from 1 April 2022. In the event that this MOPAC do not continue to fund this, Bromley will be required to commission an alternative perpetrator intervention. To ensure that this is protected an element of the anticipated MOPAC grant will be held to cover this eventuality and a separate procurement exercise undertaken.
- IV. This paper is therefore written based on the anticipated grant settlement from MOPAC remaining at the current value with the same or similar grant conditions. The current grant conditions enable Bromley to deliver services to support victims in light of the new statutory duties outlined in the new Domestic Violence Bill. We are anticipating a four year award for MOPAC funding but have no guarantee and therefore the future funding model is uncertain. The authority is exploring options for the service should MOPAC funding reduce or cease in the future.
- V. The current commissioned provider of the DV and VAWG preventative services is Bromley and Croydon Women's Aid (BCWA) who, following a procurement exercise and an extension, have a contract until 31st March 2022 with an option to extend for +1 year subject to funding.
- VI. Performance of the contract is generally good although the Key Performance Indicators will be tightened up as part of the new specification with a more outcome focus.
- VII. It is proposed to tender this contract for one year with the option to extend for a further period of three plus one years in line with the anticipated MOPAC funding award structure at an estimated whole life cost of £750,000 with a start date of 1st April 2022. This length of contract has been decided due to the service being grant funded. The current funding runs until 31st March 2022.

4 SERVICE PROFILE / DATA ANALYSIS

- 4.1 The total money from the MOPAC LCPF assigned to the VAWG project until 31st March 2021 is £205,840 per annum. It is proposed the VAWG service will cost £150,000 which would leaves £24,840 to put towards the DVA VAWG Strategic Lead Officer post and approximately £31,000 to be held for a perpetrator programme should the MOPAC funded DRIVE South BCU programme not be renewed in March 2022
- 4.2 During the COVID Pandemic there has been an increase in the number of victims and survivors reaching out for support. Likewise, there has been an increase in the number of reported incidents and offenses. BCWA report the following:

Data taken from BCWA annual report completed for MOPAC (produced annually in January for MOPAC)		2017/18 up to Q3 only	2018/19 up to Q3 only	2019/20 up to Q3 only	2020/21 up to Q3 only
IDSVA Service	Number of victims accessing IDSVA	346	248	333	700
	% reporting increased feelings of safety	87	100	100	n/a
	% reporting satisfaction with service received	100	100	97.5	n/a
One Stop Shop	Number of visits by victims of domestic abuse	317	289	267	272
Keys to Freedom* Support Programme	Number of referrals into K2F	219	219	377	234
Perpetrator Programme	Number of referrals into DVIP	37	40	36	0
	Number of perpetrators completing 30hrs	6	3	6	0
	% of women reporting increased safety where partner attended	100	80	n/a	3

5 OPTIONS APPRAISAL

- 5.1 Doing nothing is not an option as the VAWG services will stop on 31st March 2022 which will mean we will no longer be providing a support and preventative service around domestic violence and violence against women and girls.
- 5.2 Issuing a direct award under an exemption is another option but due to various providers in the market able to provide this service, it is not recommended.
- 5.3 The final option would be to put the service out to a competitive tender to ensure best value and to identify new, innovate, successful practices developed during the COVID pandemic.

6 PREFERRED OPTION

- 6.1 As the current contract is coming to an end on 31st March 2022 the preferred option is put the service out to a competitive tender.
- 6.2 The length of the contract is proposed to be one year with the option to extend for a two further periods of three years + one year commencing on 1st April 2022 and ending on 31st March 2027.
- 6.3 The cost per annum of the new contract will be £150,000 with a total contract value of £750,000.

7 MARKET CONSIDERATIONS

- 7.1 The data shows, unfortunately domestic violence and abuse is a growing issue both in Bromley and nationally. The number of potential providers of services to support victims and challenge perpetrators of DVA has grown in recent years expanding the market. The Met police BCU have identified the London Borough of Bromley having a number of high risk perpetrators in comparison to other authorities and supported the MOPAC bid to the Home Office to include Bromley in its expansion of the successful perpetrator programme from one to all three of the boroughs in the Southern BCU, which commenced on 01 March 2021.
- 7.2 Generally across most elements of this contract and its sub-projects, service users reported good levels of feeling safer and high levels of satisfaction with the services commissioned. There were however a higher number of referrals for the Keys to Freedom support group than BCWA could accommodate.
- 7.3 During the COVID Pandemic service provision was adapted and many of the services were delivered online and via virtual platforms to ensure services continued in a COVID safe way and in accordance with the Government's & Bromley Public Health's COVID guidance. Examples of how the provision was adapted are making the One Stop Shop virtual and providing the online Freedom Programme course supported by telephone contact. Unfortunately, our then perpetrator programme was unable to adapt to online delivery.
- 7.4 The proposed tender process will ask potential suppliers to demonstrate how their learning during the COVID pandemic has changed their service delivery models and look for innovation, improved service delivery, and savings ensuring the support provided to victims and survivors in Bromley is maintained or even improved.
- 7.5 In accordance with the procurement processes within Bromley, we will use the London Tenders Portal Pro-contract (LTPP). We will signpost any interested parties to LTPP, and this information will be shared in appropriate multiagency forums such as the Bromley Safeguarding Children Board, Bromley Safeguarding Adults Board, Safer Bromley Partnership and the Health and Wellbeing Board.

8 STAKEHOLDER CONSULTATION

- 8.1 The Director of Children's Services along with the Head of Early Intervention have been consulted with as part of drafting this report.
- 8.2 Feedback from the users of the current service has also been taken into account in helping shape the service moving forward.

9 SUSTAINABILITY / IMPACT ASSESSMENT

- 9.1 The VAWG commissioned services have a positive and vital impact on those vulnerable adults and children who require support and engagement.
- 9.2 A service which supports these vulnerable people is required in the long term along with a tool to measure the outcomes and the positive impact the service has had.

10 OUTLINE PROCUREMENT STRATEGY AND CONTRACTING PROPOSALS

Estimated Contract Value – £750,000

Other Associated Costs – £0

Proposed Contract Period – 01 April 2022 – 31 March 2027

- 10.1 This report is seeking authorisation to put the service out to a competitive tender to run from 1st April 2022 to 31st March 2027 at a cost of £150,000 per annum with a whole life contract value of £750,000.
- 10.2 Authorisation is with the Portfolio Holder for Children and Families and the following procurement timetable is proposed:

Documents made available from	Mon 5 th July 2021
Closing date for clarification questions	12 Noon on 26 th July 2021
Closing date for Return of Tenders	12 Noon on 9 th August 2021
Evaluation of submitted tenders	Week Commencing: 16 th August 2021
Clarification Interviews (if required)	Week Commencing: 6 th September 2021
Anticipated Award date	Week Commencing: 6 th December 2021
Notify Tenderers	Week Commencing: 6 th December 2021
Contract Commencement Date	1 st April 2022

11 IMPACT ON VULNERABLE ADULTS AND CHILDREN

- 11.1 Domestic violence and abuse is a complex and multi-faceted issue that touches many people's lives in many different ways. Domestic violence is like no other crime insofar as the perpetrator has intimate and constant access to the victim. Domestic violence and abuse is experienced by adults and children from all backgrounds, and many domestic incidents remain unreported and often result in devastating consequences for long term mental and physical health.

12 POLICY IMPLICATIONS

- 12.1 The LBB Violence against Women and Girls Strategy 2016-2019 was replaced by “An Intergenerational Domestic Violence and Abuse Strategy for 2021-2024 Making Abuse Everyone’s Business”.
- 12.2 The Safer Bromley Partnership Strategic Assessment 2016-2019.
- 12.3 HM Government Ending Violence Against Women and Girls Strategy 2016-2020.

13 COMMISSIONING AND PROCUREMENT IMPLICATIONS

- 13.1 The report seeks authorisation from the Portfolio Holder for Children and Families to proceed to procurement of a contract with a duration of one year with two extension options; one of 3 years and then one further year at a total contract value of £750k.
- 13.2 The open procedure will be utilised for this procurement. In accordance with the Council Contract Procedure Rules (CPR) rule 3.1.6, the procurement will be carried out using the Council’s e-procurement system. An indicative timetable is at 10.2 above.
- 13.3 The service to be procured falls under health, social and related services covered by Schedule 3 of the Public Contracts Regulation 2015 therefore subject to the “Light Touch Regime” (LTR). As the estimated total value of the contract is above the current LTR threshold of £663,540 it will have to be advertised in both Contracts Finder and Find a Tender Service (FTS) which replaced the former OJEU advertisement platform, with the relevant award notices also published once the contract has been awarded. The procurement must comply fully with the principles of transparency and equal treatment of tenderers.
- 13.4 The Council’s specific requirements for authorising proceeding to procurement are covered in 1.3 of the Contract Procedure Rules with the need to obtain the formal Approval of the Portfolio Holder alongside the Agreement of the Chief Officer, Assistant Director Governance & Contracts, the Director of Corporate Services and the Director of Finance for a procurement of this value. In accordance with CPR 2.1.2, Officers must take all necessary professional advice.
- 13.5 The actions identified in this report are provided for within the Council’s Contract Procedure Rules, and the proposed actions can be completed in compliance with their content.

14 FINANCIAL IMPLICATIONS

- 14.1 The proposal is for a contract of up to five years at £150k per annum, with a whole life contract value of £750k.
- 14.2 The service is funded by MOPAC Grant. It is envisaged that there will be similar levels of funding moving forward. However funding has not been confirmed beyond the 2021/22 financial year.
- 14.3 If funding is not forthcoming then the service would have to cease or be agreed to be funded by the Executive as a growth item. The contract has been set up to align with the funding announcements of the grant.

15 PERSONNEL IMPLICATIONS

- 15.1 There are no personnel implications as a result of this proposal.

16 LEGAL CONSIDERATIONS

- 16.1 The Council has a number of responsibilities in relation to reducing domestic violence and supporting both the victims and perpetrators of such violence, including powers and duties under the Crime and Disorder Act 1998, the Domestic Violence, Crime and Victims Act 2004 and the Anti-Social Behaviour Crime and Policing Act 2014. Further specific obligations as mentioned in this report are likely to be enacted as result of the Domestic Abuse Bill . In addition to these specific powers and duties the Council has a power of general competence under Section 1 of the Localism Act 2011. These powers and duties enable the Council to commission and provide the services outlined in this report.
- 16.2 A contract for the purchase of these services is a public contract under the light touch category within the meaning of the Public Contracts Regulations 2015. As the value of the Contract is above the relevant threshold (£663,540) a full EU light touch procurement is required.
- 16.4 Under the Councils Contract Procedure Rules (CPR's) the decision to authorise the Council's commissioning strategy and proceeding to procurement for contracts with a value between £500K and £1M (here £750K), must be made by the Portfolio Holder with the agreement of the Chief Officer, Delegated Budget holder, Assistant Director of Contracts and Governance, Director of Corporate Services and Director of Finance, by way of this Gateway Member Report in accordance with CPR's 5.3 and Guidance.
- 16.5 Officers need to ensure compliance with any future Grant Conditions in awarding any future contracts .Officers should also consider the application of TUPE when going out to tender and management of exit arrangements for existing arrangements.

17 IT AND GDPR CONSIDERATIONS

- 17.1 IT considerations; detailed below.
- 17.2 There are no IT considerations as there are no current or proposed IT requirements within the scope of this service.
- 17.3 GDPR considerations; detailed below.
- 17.4 The provider is instructed to process Council data in a secure manner giving consideration to appropriate technical and organisational Measures to comply with, but not exclusively;
- UK Data Protection Act 2018
 - UK Data Protection Act – Part 3 Law Enforcement Processing
 - General Data Protection Regulation 2016
 - Freedom of Information Act 2000
 - Re-use of Public Sector Information Regulations 2005
 - Local Government Act 2000
 - Computer misuse Act 1990
 - Police and Criminal Evidence Act 1984
 - Privacy and electronic Communications Regulations (PECR) 2003
- 17.5 All gathering, storing and use of information for the purposes of provisioning, and delivery of preventative services will be conducted in line with the principles of current UK Data Protection law and specifically Article 32, UK GDPR
- 17.6 The Council shall ensure that all information processed for purposes of provisioning, and delivery of preventative services is necessary and proportionate to the activity.

- 17.7 The Council shall ensure that the provider does not use information relating to individuals for profiling, marketing or other activities incompatible with the original purpose for processing unless there is a clear opt in and subsequent opt-out option available
- 17.8 The Council will ensure that appropriate due diligence will be carried out in the identification and commissioning of a service provider and that a data protection impact assessment will be undertaken prior to going out to tender.

Non-Applicable Sections:	[List non-applicable sections here]
Background Documents: (Access via Contact Officer)	[Title of document and date] [Appendices to be included]