

Integrated Impact Assessment Form (IIA) June 2012



This form replaces the previous Equality Impact Assessment form used by LBC.
The key aim of an impact assessment is to ensure that all Council policies, plans and strategies support the corporate mission statement that

'The needs of Luton's people will be first in everything we do'.

The aim of this impact assessment process is to:

- Embed Social Justice principles and practice into the Council's decision making process
- Ensure adherence to the Equality Act 2010 and associated Public Sector Duty
- Minimise duplication of initial impact assessments with regards to Environment and Health
- Ensure Officers have access to the necessary specialist support with regards to all of the above

The table on the first page of this form will enable you to make early consideration of the potential impacts of your proposal with regards to individuals, areas, cohesion, inclusion, the environment and health. You will need to review the impact table once you have completed your assessment to ensure that all impacts are clearly highlighted in the final document.

Once you have completed the table the form will guide you to explain your judgements and then, as appropriate, identify in the action plan how you will be able to enhance and maintain any positive, and mitigate any negative, impacts of your proposal in line with the council's mission and values.

This form will also help you to identify if you need further specialist advice or whether a more detailed Environmental or Health Impact Assessment may be required.

For your convenience, please see links to key Corporate and Partnership documents that may help you as you complete this IIA.

Corporate Plan

<http://intranet/SupportServices/Document%20library/Corporate%20plan%2011th%20July%202011.doc>

Equality Charter

<http://intranet/SupportServices/socialjustice/Document%20library/Equality%20charter.pdf>

Social Justice Framework

http://www.luton.gov.uk/Community_and_living/Lists/LutonDocuments/PDF/Social%20Justice/Social%20Justice%20Framework%202012%20-2026.pdf

Family Poverty Strategy

http://www.lutonforum.org/Forum/Documents/Family-Poverty-Strategy-Final-October2011_001.pdf

Joint Strategic Needs Assessment (JSNA)

http://www.luton.gov.uk/Council_government_and_democracy/Lists/LutonDocuments/PDF/Consultation/Reports/Final%20JSNA%202011.pdf

Community Involvement Strategy

<http://www.lutonforum.org/Forum/Documents/CISfinaljune2010.pdf>

Proposal Title: Sheltered Housing Review

Lead Officer Name: Sarah Rowe

Date of IIA: 11 October 2012

Seen By: Sandra Legate
SJU (Name/Date)

Signed Off By: Mo Harkin
Bundle Lead/Head of Service
(Name/Date)

Please provide an outline description of your proposal:

Luton Borough Council currently owns 922 sheltered homes provided in 20 Sheltered Schemes and 2 Extra Care Schemes across the town. Sheltered Housing enables tenants to live independently, having the freedom and privacy of their own front door with the added security of knowing that there is help at hand. Sheltered Schemes are promoted on the basis that they provide residents with access to a scheme manager, a 24hr emergency alarm system, home care to meet personal needs, communal activities and social spaces.

Currently there are a number of problems with the service that need to be resolved, which include:

- Service levels are inconsistent between schemes, reflecting varying staffing arrangements, staff to tenant ratios and levels of onsite service.
- Resources for housing related support are not targeted where they are most needed and there is limited capacity to deliver outreach work into the wider community.
- The current staffing model does not provide flexibility to ensure cover is provided when and where it is needed.

Historically the staffing model operated by the Council has involved residential scheme managers, on a one manager per site basis. Pending the outcome of previous sheltered housing reviews, five vacancies have been left unfilled and four posts have been filled on a non-residential temporary basis.

Whilst some of the shortcomings of the current service could theoretically be tackled by increasing staffing to a level of more than one manager per scheme, this would represent a significant growth in costs that would have to be met from tenants rents or service charges. Moreover, it would not solve some of the broader contextual challenges and those raised by earlier sheltered reviews:

1. An oversupply of sheltered housing – resulting in problems of low demand.
2. An increasingly complex profile of needs within schemes - more residents with complex needs and an increasingly ageing population, living alongside independent retirees who don't yet need support

but want the communal environment which schemes provide.

3. Physical problems with the stock – e.g. 3 schemes without lifts, 5 with bedsit accommodation, a number which are not fully wheelchair accessible.
4. A growing need likely to emerge for housing related support amongst older residents in the wider community.
5. The pressure to make better use of available resources. Funding for housing related support comes from the Council's General Fund and this funding stream must deliver value for money, with resources targeted at those who need it.

In seeking to address these broader contextual challenges, the Council is asked to consider four proposals to improve and develop the service so that it meets the needs of current and potential future service users.

These are in all cases proposals to consult on, rather than implement change. The four proposals put forward by initial consideration are:

1. **To consult with tenants, staff and other key stakeholders** about improving and developing the service through a new model of support, namely:

A neighbourhood cluster model – with one sheltered scheme providing an office base that serves a cluster of neighbouring sheltered schemes and people living in the wider community. This model would provide a mix of on-site and mobile/off-site scheme management, with scope to develop a more comprehensive 24/7 emergency response service than that currently provided.
2. **To develop more detail staffing and service proposals through consultation with staff, Union and tenant representatives**, which should include developing a vision for the service, identifying required staffing levels and agreeing how any transition away from a residential model of scheme could be managed.
3. **To identify schemes that could become office base sites within neighbourhood clusters** through analysis of need within these schemes (e.g. tenant age profile, proportion of tenants in high need groups or in receipt of domiciliary care, percentage of tenants in daily contact with their scheme manager) and **use this information in the service planning and consultation process** as appropriate.
4. **Review whether there is potential for re-designation, following a full and detailed consultation process** with scheme residents, staff and other relevant stakeholders, and develop investment proposals to address the need for upgrading in some schemes.

If some or all of these proposals were to be considered viable for consultation with tenants, staff and stakeholders then they would be taken to Executive accordingly to request for permission to consult.

The Neighbourhood Cluster Model has been proposed for potential consultation with stakeholders

because it provides the optimum way of improving the quality and consistency of service, whilst offering continued onsite provision within office-base schemes, alongside a mobile offsite service for satellite schemes.

As well as consulting on the principle of the Neighbourhood Cluster Model, the Sheltered Housing Review Group is being asked to recommend that permission is sought to consult on the detailed elements of any potential change. It is recognised that it is through involving staff and service users in discussions about the detail of a possible new model that the optimum outcome is likely to be delivered, in the form of improved service delivery.

Consultation on potential change is integral to ensuring that we deliver the best outcomes for Sheltered Housing Tenants in the future. Given the vulnerable nature of many residents and the sensitivity of the subject matter, care and caution will be taken in all communication with residents. It is hoped that tenants' experience of engaging in consultation with the aim of better service delivery would be a positive experience for them.

This draft IIA is therefore part of a report to Executive on 3rd December, asking for permission to consult with tenants, stakeholders and staff on the areas outlined above. This draft IIA assesses the likely impact (in principle) of the implementation of Proposal 1 above – i.e. the introduction of a neighbourhood cluster model – on protected groups within the base of affected service users.

This draft IIA concludes that, as the proposals stand at this time, the broad impact of a change of service model on service users overall may be positive, as the overall aims of the consultation on remodelling the service are to improve the quality and consistency of the Council's sheltered housing service, by working to deliver:

- Homes that people want to live in, and that will be fit for purpose as they age
- More choice for service users about the intensity of housing management service and the support they receive
- An equitable use of Council resources to support older people living in sheltered housing and in the wider community

As the proposals are at an early stage, this IIA treats the Sheltered Scheme tenants as one affected group, analysing the impact of the change on protected groups within the sheltered scheme population as a whole.

Should permission to consult on any or all of the other proposals be granted and a more detailed service and staffing proposal be developed, further work would be carried out on this IIA. This would include an assessment of the impact of change for specific groups within the overall Sheltered Accommodation, to reflect the changes that are being made. As an example, based on the recommendations above, this analysis would address:

1. The impact of the proposed change on **service users within sites which are designated to become 'office base sites'** within the neighbourhood cluster scheme – i.e. those with an onsite presence
2. The impact of the proposed change on **service users within sites which are designated to**

become ‘satellites’ within the neighbourhood cluster scheme – i.e. those without a permanent onsite presence

3. The impact of the proposed change on **service users within sites which are potential sites for re-designation.**
4. The impact of the proposed change on **staff**, once further detail on staffing arrangements has been developed through consultation.

Please list other contributors and stakeholders involved in the preparing of this assessment:

If there is any potential impact on staffing you must invite trade union involvement in the preparation of this assessment:

There is an impact on staffing. TU involvement to be sought prior to Executive.

IMPACT TABLE

The purpose of this table is to consider the potential impact of your proposal against the Equality Act 2010 'protected characteristics' and other key priorities of Community Cohesion, Social Inclusion, Health and Environment. We also ask you to consider potential outcomes against the key priorities of our Corporate Plan (see link).

Once you have completed this process you should have a clearer picture of any potential significant impacts*, **positive**, **negative** or **neutral**, on People or Places as a result of your proposal. The rest of the questions on this form will help you clarify impacts and identify an appropriate action plan. ("Significant impact" means that the proposal is likely to have a noticeable effect on specific section(s) of the community greater than on the general community at large).

In relation to the protected characteristics below, will the proposal have an impact in relation to the outcomes below?

Please fill out this table as much as you can initially. Once you have completed the rest of the form, come back and complete as appropriate	Impact Identified	Outcomes Having identified the impact will it contribute to any of the following Council priorities below?		
		Empower, support & protect the vulnerable (Equality)	Improve life & learning opportunities for all (Inclusion)	Improve health & reduce health inequalities (Health)
PEOPLE	delete as applicable from the selection below <div> <input checked="" type="checkbox"/> = Positive <input checked="" type="checkbox"/> = Negative <input type="checkbox"/> = Neutral </div>			
Race	<input type="checkbox"/>	N/A	N/A	N/A
Gender	<input checked="" type="checkbox"/>	Yes	Yes	N/A
Disability	<input checked="" type="checkbox"/>	Yes	Yes	N/A
Sexual Orientation	<input type="checkbox"/>	N/A	N/A	N/A
Age	<input checked="" type="checkbox"/>	Yes	Yes	N/A
Religion/Belief	<input type="checkbox"/>	N/A	N/A	N/A
Gender Reassignment	<input type="checkbox"/>	N/A	N/A	N/A
Pregnancy/Maternity	<input type="checkbox"/>	N/A	N/A	N/A
Marriage/Civil Partnership (HR issues only)	<input type="checkbox"/>	N/A	N/A	N/A
Care Responsibilities ¹ (HR issues only)	<input type="checkbox"/>	N/A	N/A	N/A
PLACE				
Strengthen community cohesion	<input type="checkbox"/>	N/A	N/A	N/A
Tackling poverty/ promoting social inclusion	<input checked="" type="checkbox"/>	N/A	N/A	N/A
Area/Wards affected All Wards	<input type="checkbox"/>	N/A	N/A	N/A

¹ This is a Luton specific priority added to the 9 protected characteristics covered under the Equality Act and takes into account discrimination by association.

ENVIRONMENT				
Protect and enhance the quality of the natural and built environment	<input type="checkbox"/>	N/A	N/A	N/A
HEALTH				
Promoting health and wellbeing	<input checked="" type="checkbox"/>	N/A	N/A	N/A

Please answer the following questions to help you identify any actions you may need to take with regards to impacts of this proposal

1. Consultation

1.1 Have you made use of existing recent research, evidence and/or consultation to inform your proposal? Please insert links to documents as appropriate.

Use was made of previous surveys of existing research and consultation in the form of:

1. 2008 survey of Sheltered Housing Tenants (link below)
2. 2010 Sheltered Tenant Satisfaction Survey (link below)
3. Review of Sheltered Housing in 2007/2008
4. Commissioning Strategy and Action Plan – Accommodation and Support for Older and Vulnerable People (Luton Borough Council, 2011)

If you would like to know of any potentially relevant research already carried out, please click on the following link below to ***LBC Consultation Portal***

For other local statistics and information, click on the following below link for ***Luton Observatory***

Guidance Notes:

If no use has been made of research, please contact the Consultation and Engagement Team At Communitycon@luton.gov.uk and/or the Research & Intelligence Team at research.intelligence@luton.gov.uk

[Click here for LBC Consultation Portal](#)

[Click here Luton Observatory](#)

**Insert any links to reference websites below.
One per space only**

[2008 Sheltered Housing Survey](#)

[2010 Sheltered Tenant Satisfaction Survey](#)

**Insert any relevant files in the spaces below.
One per space only**

[For advice and support from Consultation Team click here](#)

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1.2 Have you carried out any specific consultation with people likely to be affected by the proposal? (if yes, please insert details, links to documents as appropriate).

Guidance Notes: If no, please explain why this has not been done - you may wish to speak to the Consultation Team first as a lack of sufficient consultation could render this IIA invalid and place the Council at risk of Judicial Review.

Initial consultation with tenants has been conducted in 2012 the form of the Sheltered Housing Survey. This survey was conducted to explore residents' perceptions of the service, and to develop a better understanding of customer requirements. A very good response rate was received, with 443 responses, representing a 49% response rate. A brief report of findings is attached with this draft IIA. This evidence suggests that while scheme managers' services are highly valued by the majority of residents, some residents do not feel their needs are being effectively met, and satisfaction levels vary from scheme to scheme. This early feedback highlights the need to review the current approach to service delivery to provide a more consistent level of service across the borough.

The information accompanying the Sheltered Housing Survey explained that the sheltered housing review was exploring a range of ways to deliver service improvements, including through alternative staffing and service models. This information prompted some letters of concern from relatives of residents living in Quantock Court, and petitions from Quantock and Memorial Court raising concerns about moving away from the current residential scheme manager model of provision; respondents were very anxious about the impact of any staffing changes on their security and safety. If the Council agrees to consult residents about changing its service model, it will be essential to explain how the changes will deliver improvements in the quality and consistency of service, and to show that residents' security will not be negatively affected. As part of the consultation process, residents and their families will need to be provided with the opportunity to meet officers for face to face discussion about what is proposed, and to have access to independent advice/advocacy.

A staff focus group was conducted in 2012, to enable staff to contribute to the development of the framework for the sheltered housing review. A write up of the findings is attached with this IIA.

This IIA accompanies a report which requests permission to consult on the proposal to re-model the service on the basis of a Neighbourhood Cluster framework. If granted permission to consult we would undertake this consultation with tenants, staff and stakeholders to collate views on a potential new model and to develop ideas for the operational elements for any new model of service. The feedback from this consultation would be returned to Council Executive in order to make a decision on the future of the service.

[For advice & support from the Social Justice Unit click here](#)

2. Impacts on People

2.1 Where you have identified a **positive*** impact please explain the nature of this impact.

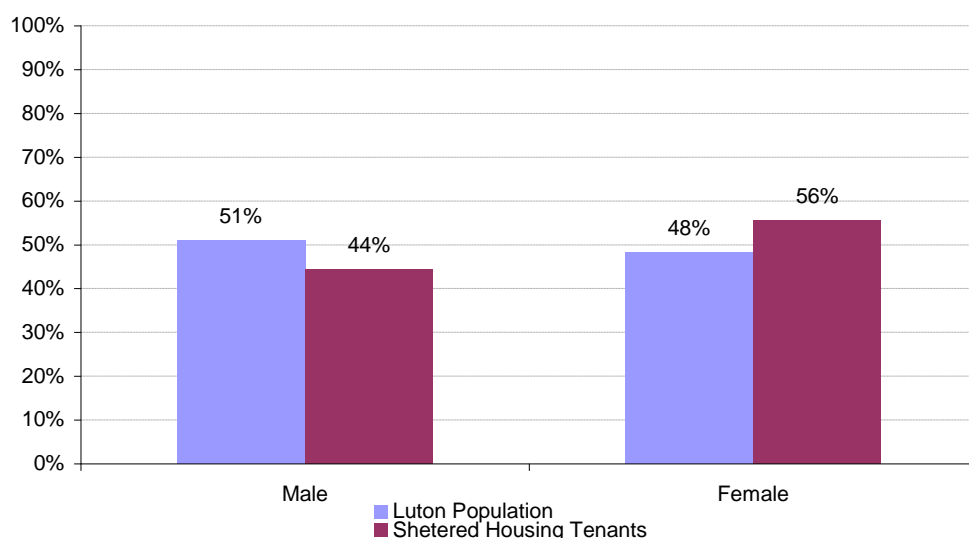
Guidance Notes:

If you identify positive impacts with regards to one or more groups listed above please outline how these can be enhanced and maintained against each group identified. Specific actions to be detailed in action plan below.

**By positive impact we mean, is there likely to be a noticeable improvement experienced by people sharing a characteristic?*

Gender: Positive. If the proposal to introduce a Neighbourhood Cluster model of service was implemented after consultation with tenants, staff and stakeholders then this change would have a disproportionate impact on females, as women represent 56% of the Sheltered Housing population compared to 48% of the Luton population at large. Subject to further consultation, the overall impact on this protected group is expected to be positive, as the overall change to the service is designed to improve quality, make the service more equitable and consistent, and target resources more effectively to those who need it. As women are disproportionately affected by changes to sheltered housing, changes that improve the quality and consistency of service and the built environment will impact particularly on the female residents of sheltered housing.

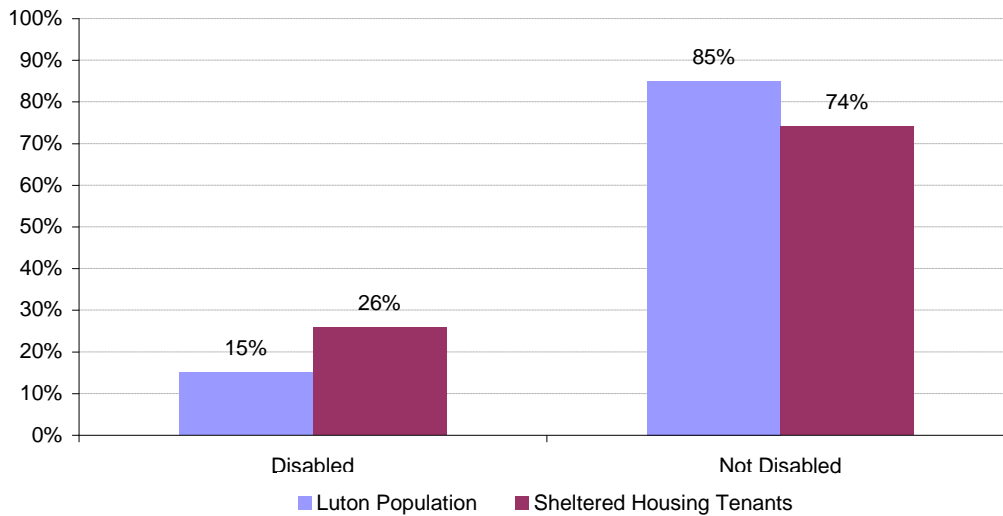
Gender Mix: Luton population vs. Sheltered Housing Tenants



Disability: Positive. If the proposal to introduce a Neighbourhood Cluster model of service was implemented after consultation with tenants, staff and stakeholders then this change would have a disproportionate impact on those with a disability, as this group represent 26% of the Sheltered Housing population (those classified as having a specialist need in terms of mobility, frailty or nursing care), compared to 15% of the Luton population at large. Subject to consultation, the impact on this protected group is expected to be positive for those with a disability, as the overall change to the service is designed both to improve the consistency and quality of the service, and to target resources for housing related support at those who need it. Improvements to the built environment will also have a beneficial impact. The proposed changes to the service would also potentially improve access to help and support for those living

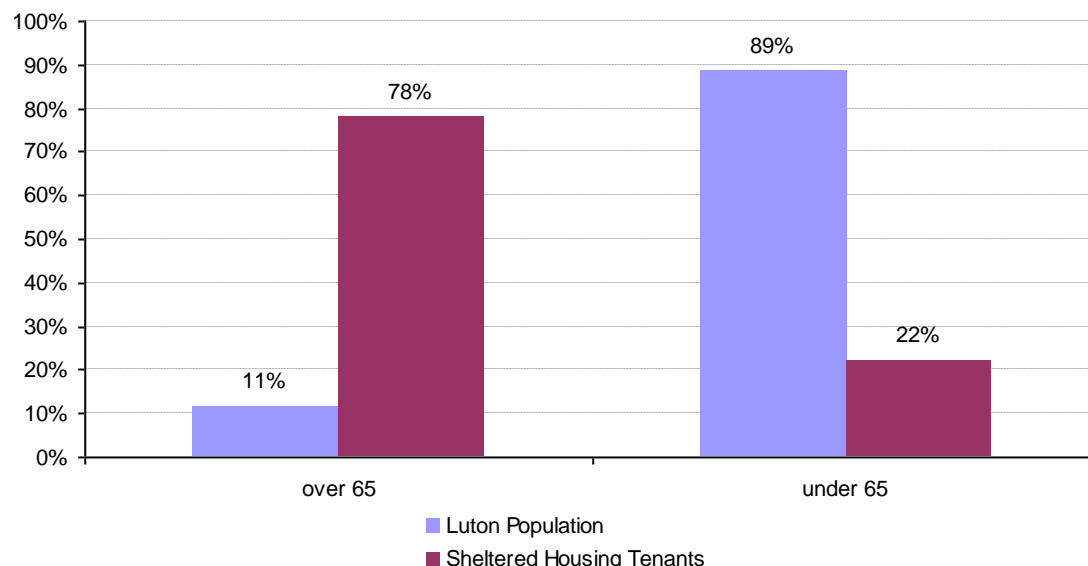
in the wider community with a disability.

Disability: Luton population vs. Services Users



Age: Positive. If the proposal to introduce a Neighbourhood Cluster model of service was implemented after consultation with tenants, staff and stakeholders then this change would have a disproportionate impact on those over the age of 65, as this group represent 78% of the Sheltered Housing population to 11% of the Luton population at large. Subject to consultation, the impact on this protected group is expected to be positive for older residents, as the overall change to the service is designed both to improve the consistency and quality of the service, and to target resources for housing related support at those who need it. Improvements to the built environment in schemes that need upgrading will also have a beneficial impact. The proposed changes to the service would also potentially improve access to help and support to older people living in the wider community.

Age: Luton Population vs. Sheltered Housing Tenants



2.2 Where you have identified a **negative*** impact please explain the nature of this impact.

Guidance Notes:

Please use this box to explain why you feel the proposal may be negative and outline what the consequences will be against each group identified. You will need to identify whether mitigation is available, what it is and how it could be implemented. Specific actions to be detailed in action plan below.

**By negative impact we mean is there likely to be a noticeable detrimental effect on people sharing a characteristic?*

If you can identify no mitigation with regards to negative impacts on one or more of the protected groups you must contact the Social Justice Unit – Click the email link box above.

No negative impact currently identified but this may change after consultation with residents and other key stakeholders.

2.3 Where you have identified a **neutral*** impact for any group, please explain why you have made this judgement.

Guidance Notes:

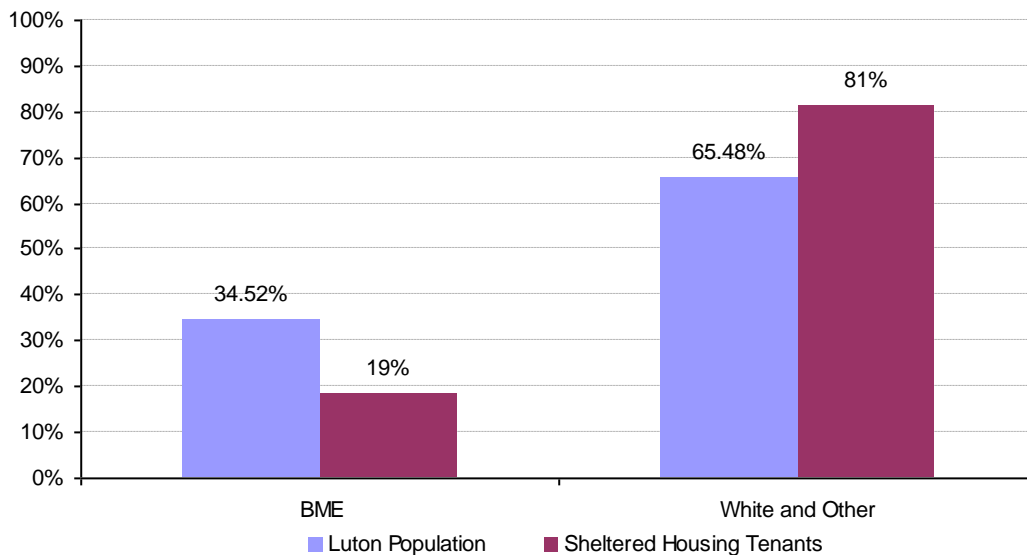
You need to be confident that you have provided a sufficient explanation to justify this judgement.

**By neutral impact we mean that there will be no noticeable impact on people sharing a characteristic*

Race: Neutral. If the proposal to introduce a Neighbourhood Cluster model of service was implemented

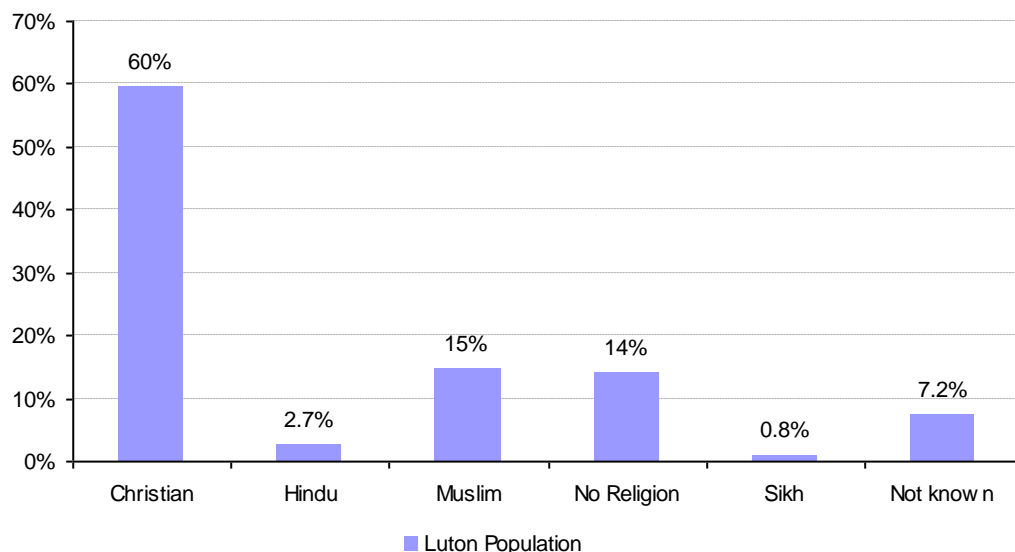
after consultation with tenants, staff and stakeholders then no protected racial group would be disproportionately affected. The impact therefore has been classed as neutral, as the proposed positive change to the service would be equally beneficial to protected racial groups and that the service will safeguard the principle that no service users or staff will be unlawfully discriminated against because of their race.

Racial Mix: Luton population vs. Sheltered Housing Tenants



Sexual Orientation: Neutral. Information on this protected group is currently pending for Luton's population as a whole and Sheltered Accommodation tenants. The impact has therefore been categorised as neutral, with an assumption that no group would be discriminated against because of their sexual orientation within the development of the new service.

Religion/Belief: Neutral. Information on this protected group is currently pending for Sheltered Accommodation tenants. The impact has therefore been categorised as neutral, with an assumption that no group would be discriminated against because of their religion or belief within the development of the new service.

Religion: Luton population vs. Sheltered Accommodation Tenants

Gender Re-Assignment: Neutral. Information on this protected group is currently pending for Luton's population as a whole and Sheltered Accommodation tenants. The impact has therefore been categorised as neutral, with an assumption that no group would be discriminated against because gender re-assignment within the development of the new service.

Pregnancy/Maternity, Marriage/Civil Partnership, Care Responsibilities: Neutral. These areas relate specifically to staff within Sheltered Housing Schemes. This IIA relates specifically to tenants with these schemes rather than staff and it is acknowledged that should permission be granted to proceed with consultation regarding potential service re-modelling, then a separate IIA should be drawn up with respect to staff. These categories have currently been flagged as Neutral, with the assumption that In relation to pregnancy-maternity all H.R. rights will be abided by and care responsibilities will be considered to ensure no person is discriminated against by association.

For advice & support from the Social Justice Unit click here

3. Impacts on Cohesion

If you have identified an impact on community cohesion, please describe here what this may be and who or where you believe could be affected.

Guidance Notes:

By 'impact on community cohesion' we mean - is the proposal likely to have a noticeable effect on relations within and between specific section(s) of the community, neighbourhoods or areas.

You will need to consider here actions to enhance and maintain positive impacts and how to mitigate negative impacts.

Specific actions to be detailed in action plan below.

If you can identify no mitigation with regards to negative impacts on community cohesion you must contact the Social Justice Unit – Click email link box above

No impact identified.

[For advice & support from the Social Justice Unit click here](#)

4. Impacts on Poverty & Inclusion

If you have identified an impact on tackling poverty/promoting social inclusion, please describe here what you believe this would be and who you believe would be affected.

Guidance Notes:

By poverty and inclusion we mean - is the proposal likely to have a noticeable effect on households that are vulnerable to exclusion, e.g. due to poverty, low income and/or in areas of high deprivation.

You need to consider here actions to enhance and maintain positive impacts or mitigate negative impacts.

Specific actions to be detailed in action plan below

If you can identify no mitigation to negative impacts on tackling poverty or promoting social inclusion you must contact the Social Justice Unit for advice - Click email link box above

At this time it is thought that the proposed changes will have a positive impact on Poverty and Inclusion , as the overall change to the service is designed to make the service more equitable, effectively target resources more effectively to those who need it. Within this, both tenants and those within the wider community who experience poverty and are at risk of social exclusion should be receive improved access to help and support.

[For advice and support from Public Health click here](#)

5. Health & Wellbeing

If you have identified an impact with regards to promoting Health and Wellbeing please consider the questions below in more detail.

5.1 Please describe what this impact is and who may be specifically affected by the proposal.

Guidance Notes:

By impact on health and wellbeing we mean - is there the potential for a positive or negative impact on the physical, mental or social well-being of an individual / group. You need to consider here actions to enhance and maintain positive impacts or mitigate negative impacts.

Specific actions to be detailed in action plan below

If you are unable to identify mitigation to questions 5.1 and 5.2 then you must contact the Public Health Team for advice. - Click email link box above

Positive impact on access to services which promote health and wellbeing

5.2 Will the proposal impact positively or negatively on access to, and /or quality of, health and wellbeing services?

Guidance Notes:

By Health and Wellbeing services we mean clinical services as well as, for example, health improvement services such as Stop Smoking, weight management, alcohol and drug services, exercise programmes, affordable warmth, falls prevention etc.

You need to consider here actions to enhance and maintain positive impacts or mitigate negative impacts

Specific actions to be detailed in action plan below.

If you are unable to identify mitigation to questions 5.1 and 5.2 then you must contact the Public Health Team for advice. - Click email link box above

At this time it is thought that the changes will have a positive impact on Health and Wellbeing, as the overall change to the service is designed to make the service more equitable, to target resources more effectively to those who need it, as well as delivering improvements to the built environment in schemes that need upgrading. Within this, both tenants and those within the wider community who would benefit from support to promote better health and wellbeing should receive improved access to this.

[For advice and support from the Strategy & Sustainability Team click here](#)

6. Impacts on the natural & built environment

If you have identified an impact on the natural and built environment please consider the questions below.

Are there aspects of this proposal that may:

- a)** help in reduction of greenhouse gas emissions, produced by the burning of fossil fuels (i.e. coal, oil), which is likely to add to the effects of climate change
- b)** have an effect on conservation of energy, water, minerals and materials
- c)** have an impact on the amount of waste that could be generated through the implementation of the proposal
- d)** impact positively or negatively on access to and the quality of the natural environment (eg parks, play areas, green spaces, conservation areas)
- e)** improve people's or infrastructure's resilience towards extreme weather conditions
- f)** affect amount of car journeys to/from a particular site

Guidance Notes:

If you identify positive impacts with regards to questions please outline how these can be enhanced and maintained. If you identify negative impacts in response to questions then you will need to explain any actions that you intend to take to mitigate these impacts.

Specific actions to be detailed in action plan below

If you are unable to identify mitigation with regards to questions 6.a-f then you must contact the Strategy and Sustainability Team at myclimate@luton.gov.uk as a more detailed specialist consideration of this proposal will be necessary. Click email link box above

a)
b)
c)
d)
e)
f)

Please detail all actions that will be taken to enhance and maintain positive impacts and to mitigate any negative impacts relating to this proposal in the table below:

Action	Deadline	Responsible Officer	Intended Outcome	Date Completed/ Ongoing

A review of the action plan will be prompted 6 months after the date of completion of this IIA

Key Contacts:

Summary of Findings and Actions (for publication and to be written by the author)

Next Steps

- All Executive Reports must have an IIA attached (where relevant)
- All report authors must complete the IIA section of Executive Reports (equalities, cohesion, inclusion, health, environment)
- All reports are to be forwarded to the Social Justice Unit, Public Health and Strategy & Sustainability Unit for sign off in time for Executive deadline
- Social Justice Unit, Public Health and Strategy & Sustainability Unit to highlight key points of concern from IIA in their sign off comments
- On the rare occasion that the Social Justice Unit are unable to sign off the report, e.g. recommendations are in breach of legislation, a statement will be submitted by Social Justice Unit Manager or Equality and Diversity Policy Manager
- Completed and signed IIA's will be published on the internet once the democratic process is complete