

The key aim of an impact assessment is to ensure that all Council policies, plans and strategies support the corporate mission statement

***‘Enabling Luton to be proud, vibrant, ambitious and innovative’.***

### Why do I need to do an IIA?

The aim of this impact assessment process is to:

- Ensure adherence to the legal duties contained within the Equality Act 2010 and associated Public Sector Duty to analyse the impact of decisions to be undertaken by Council.
- Ensure the Council has **due regard** to equality taking a proportionate and timely approach to analysing the impact on citizens.
- Minimise duplication of initial impact assessments with regards to Environment and Health and maximise consideration of other key Council priorities of Inclusion and Community Cohesion.
- Ensure that the Council has been able to consider the social, health, environmental and economic impacts in its decision making in a single document and, where necessary enable the production of a comprehensive action plan to mitigate any potential negative impacts identified.

### When do I need to do an IIA?

- An IIA must be started at the beginning of any project, policy or strategy, and cannot be finalised until such time as all consultations, as required, are undertaken.
- The Impact Table will help you to make early consideration of the potential impacts of your proposal and should be used from the point at which preliminary report is taken to Corporate Leadership and Management Team (CLMT) where appropriate. By using this table at your earliest point in the project, potential impacts can be highlighted and it will also be clear whether you need to carry out a full IIA.
- If you complete this table and all impacts identified are neutral, i.e. there is no noticeable impact on characteristics and priorities listed and you are fully confident of this, please contact the SJU by email setting out how you have reached this judgement as it is unlikely you will need to carry out a full IIA.
- An IIA must at all times identify those who will be affected by the decision, policy or strategy.
- At a time of economic austerity IIA authors are minded to consider the whole range of decisions, both locally and nationally when analysing the impact on citizens.
- Your first early draft is to be sent to the Social Justice Unit for comments and guidance
- Once consultation has ended, the IIA must be updated with results of the consultation and returned to Executive, where required, for further consideration and approval – at this stage it will be signed off as completed by the Social Justice Unit.

**If you need further guidance please contact the Social Justice Unit (SJU). Please see links at the end of this document to key Corporate and Partnership documents that may help you complete this IIA.**

# Integrated Impact Assessment Form (IIA)

<b>Proposal Title:</b>	ASC Provider Savings
<b>Lead Officer Name:</b>	Catherine Dhokia
<b>Date of IIA:</b>	4 <sup>th</sup> August 2020

<b>Date updated after consultation:</b>	
<b>Early draft Seen by:</b> <i>(Please send an early draft of your IIA to the SJU to ensure all impacts are being considered at the appropriate time)</i>	Maureen Drummond, Interim Equalities Manager, 29 September 2020

<b>Finalised IIA Signed and seen by SJU :</b>	
<b>Name:</b>	
<b>Date</b>	

<b>Names of all other contributors and stakeholders involved in the preparing of this proposal who have been consulted with and agreed this assessment:</b> <i>(Please note the IIA must not be carried out by one person)</i>	<p>Individuals and families that attend Community Choices            Service Director – Maud O’Leary            Service Manager – Suzette Alleyne            Corporate Director – Gerry Taylor (DMT)            Nahad Choudhury – Finance            Catherine Dhokia – Resource Manager            Learning Disabilities            Janine Macey – Operations Manager            Community Choices</p> <p>The unions will be consulted before proceeding with the OCA.</p>
<b>If there is any potential impact on staffing please include the name/s of the trade union representative/s involved in the preparation of this assessment or any supporting evidence of request to participate:</b>	Christina Beddows, Jason Childs

## Proposal Outline

Information supporting the proposal (**who, what, where, how, why**). Breakdown of present users by ethnicity, age, sex, disability, religion/belief, sexual orientation (if recorded). Show areas in the town with the biggest and lowest needs. Greater emphasis is required at the start of the IIA on the service, how it is delivered now and how the new service will be delivered.

With the pressure on the council budget, ASC has to reduce its overall budget by £4.1M budget over the next 2 financial years. Within this context ASC has sought to protect, as far as possible, statutory services. However, it is recognised that a reduction of services may have a significant impact on the lives of individuals and carers, now and in the future.

## What is being assessed

1. Reduce the number of Care Assistant posts in extra care covering Abigail Court, Applegrove and Colwell Court to bring the staffing capacity in line with the assessed need and demand.
2. Delete the vacant posts in Reablement on the basis that they are not needed going forward and any increase in future demand could be managed by improving productivity.
3. Combine the Reablement and Extra Care service under a single CQC registration with 1 registered manager.
4. Reduce the number of Senior Worker posts (L6) in Supported Living and changing the structure to include L4 Support Worker posts.
5. Reduce the number of Senior Worker posts (L6) in Respite & Shared Lives and changing the structure to include L4 Support Worker posts.
6. Align Supported Living and Respite and Shared Lives under 1 registered manager with dual registration.
7. Reduce the number of Senior Worker posts (L6) in Learning Disability Day Services and the number of Day Care Officers (L4).
8. Align older person day care and learning disabilities day care under 1 operations manager
9. Align all Provider Services under 1 Service Manager

## What is the main aim

The aim is to save £1.4M across council run Provider Services, including: Reablement, Supported Living, Extra Care, Respite and Shared Lives, Learning Disability Day Care and Older Persons Day Care.

The proposal is to bring all ASC provider services under a single management structure. Aligning the services under manager will provide for better strategic and systems oversight and leadership including new models of working, building volunteering capacity, income generation etc. The function of each service is unchanged. The form this takes will be different with changes proposed to the management structure, bringing posts together and the creation of new posts, some of which will work across all the services rather than in a the more traditional vertical structure. There will be more emphasis on working more flexibly and agile for all staff, operating as one system rather than each service working independently of the others.

## Who is affected?

The table below details the staff that are directly affected. There is mitigation by 3 posts being created at M1 and also the posts at risk between L2 and L4 will be covered by vacant posts at similar grades in Supported Living and Learning Disabilities Day Care, 24 in total.

Post Description	Grade	FTE	Headcount	Vacant (Yes)
Service Manager Support at Home	M7	1	0	Yes (1 )
Resource Manager Learning Disabilities	M5	1	1	No
Respite and Shared Lives Manager	M3	1	1	No
Supported Living Manager	M2	1	1	No

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Reablement Manager	M4	1	1	No
Extra Care Manager	M4	1	1	No
Older People Day Care Manager	M3	1	1	No
Operations Manager Community Choices	M2	1.0	1	No
Extra Care Home Carer	L2	26.97	31	Yes ( 3.19)
Senior Support Worker	L6	6	7	Yes (1)
Senior Community Development Coordinator	L6	5	5	No
Learning Disability Service Coordinator	L6	1	1	No
Senior Reablement Coordinator	L7	2	2	No
Team Leader Extra Care Home Care	L6	2	2	No

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Older People Day Care Team Leader	L6	5	6	Yes (1)
Older People Day Care Senior Day Care Officer	L4	3	3	No
Catering Officers	L2	4.45	7	No
Older People Domestic Assistant	L1b	1.79	3	No
<b>Totals</b>		<b>65.21</b>	<b>74</b>	<b>6.19</b>

### Breakdown of affected staff demographic characteristics

Age Band	Count of Personal
31-35	1
36-40	2
41-45	6
46-50	5
51-55	14
56-60	18
Over 60	21
<b>Grand Total</b>	<b>67</b>

Sex	Count of Personal
Female	63

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Male	4
Grand Total	67

	Count of Personal
Ethnicity	
BME	23
Not Known/Declined to Specify	4
White	40
Grand Total	67

	Count of Personal
Religion	
Christian	45
Hindu	2
Muslim	2
None	3
Not Known/Declined to Specify	11
Other	2
Sikh	2
Grand Total	67

	Count of Personal
Consider Disabled?	
No	49
Not Known/Declined to Specify	8
Yes	10
Grand Total	67

	Count of Personal
Sexuality	
Heterosexual	53
LGBT	2

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Not Known/Declined to Specify	12
Grand Total	67

79% of the staff affected are over 50 years of age and individuals over the age of 55 are of pensionable age. Voluntary redundancies will be considered if possible to reduce the number of compulsory redundancies. Those staff aged 55 or over will be able to access their unreduced pension.

94% of staff affected are women, 58% are white, 34% are BME, 67% are Christian, 79% are heterosexual and 15% considered disabled. The mitigation is that there are vacancies across the service which individuals can apply for and any reasonable adjustments for people with a disability will be considered. Interviews will be guaranteed for those staff who declare a disability

For staff who secure jobs in the new structure if the grade is lower than their substantiated grade they will receive pay protection



## Impact Table

The purpose of this table is to consider the potential impact of your proposal against the Equality Act 2010 'protected characteristics' and the Council's Social, Environmental and Economic priorities.

Once you have completed this process you should have a clearer picture of any potential significant impacts<sup>1</sup>, **positive**, **negative** or **neutral**, on the community and/or staff 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.

Protected Groups	Citizens/Community			Staff (for HR related issues)		
	Positive	Negative	Neutral	Positive	Negative	Neutral
Race			X			X
Sex			X		X	
Disability			X		X	
Sexual Orientation			X			X
Age			X		X	
Religion/Belief			X			X
Gender Reassignment			X			X
Pregnancy/Maternity			X			X
Marriage/Civil Partnership (HR issues only)			X			X
Care Responsibilities <sup>2</sup> (HR issues only)			X			X
Social & Health <sup>3</sup>						
Impact on community cohesion			X			
Impact on tackling poverty			X			
Impact on health and wellbeing			X			
Environment						
Impact on the quality of the natural and built environment			X			
Impact on the low carbon agenda			X			
Impact on the waste hierarchy						
Economic/Business						
Impact on Luton’s economy and/or businesses		X				
Impact on jobs		X				
Impact on skills			X			

<sup>1</sup> "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.

<sup>2</sup> This is a Luton specific priority added to the 9 protected characteristics covered under the Equality Act and takes into account discrimination by association.

<sup>3</sup> Full definitions can be found in section 3

Please answer the following questions:

<b>1. Research and Consultation</b>
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.
<a href="#"><u>Click here for local demographics and information</u></a>

A full analysis has been undertaken on all the services looking at the performance data, trends, market comparators and productivity. The findings are set out in Appendix 1, however for expediency a short synopsis of the findings is set out below:

**Extra Care** - approximately 300 hours a week of surplus capacity based on the current demand. High unit cost. Additional spend on agency use and additional hours. Proposal to reduce staffing from 33.66 to 23.24. There are currently 3.23 FTE vacancies, therefore 10 FTE posts (L2) would be subject to potential redundancy. Opportunity to outsource to the private sector to achieve further savings and could be later insourced to LATC if the conditions were right – strategy, TUPE, financial position etc.

**Reablement** – supports mainly people being discharged from hospital. Significant oversupply of staffing hours, equivalent to 8 FTE. High unit cost. Could operate more effectively with integrated therapies and earlier identification of people who are likely to need ongoing care. Reablement flats are not used effectively and proposal to reduce from 6 to 2. The service is currently operating with 24.73 (L3) vacancies. We are proposing to delete 12 FTE posts and retain 12.73 FTE as contingency – 5 FTE to accommodate fluctuations in demand or demand increasing and 7.73 FTE for Side by Side.

**Supported Living** – overall effective and efficient. Unit cost in line with industry norms. Opportunity to improve staffing structure which would improve the service still further. Risk of 1 FTE redundancies at L6, creating 8 L4 posts. We are proposing to reduce 1 L6 posts and create 1 Deputy Manager post) that functions across the service locations to strengthen the leadership structure. Represents the best option to insource via a Local Authority Traded Company by virtue of the potential to trade and strategic fit – adults and children.

**Respite & Shared Lives** – operating well. Unit cost better than comparators. Proposed reduction of 1 Senior Worker (L6), creating 2 L4 post and combining the registration with Supported Living to have 1 manager instead of 2. Opportunity to expand the shared lives which is generally underdeveloped in Luton.

**Learning Disabilities Day Care** – comparable unit price to industry. Highly effective in supporting individuals and families provided needed respite. Opportunity to leverage volunteering more. Currently operating with 19 FTE vacancies, 8.5 of which would be deleted (L2 & L3). Proposal to reduce Senior Workers from 5 to 3 FTE, creating 1 Deputy Manager Post (indicative M1) that functions across all services and exit Farley Community Centre by December 2020.

**Older Persons Day Care** – Due to a reduction in demand for older person's day care under this OCA the proposal is to reduce and change the current staffing model. The current statistics shows a decline in the region of 25 % in most centres' average daily attendance. The proposal will ensure that the service is re-modelled to be more efficient and effective by combining all day services (older people and learning disabilities) under 1 manager. This will strengthen our day care offer by utilising staffing resource and buildings more effectively to improve productivity. The proposal will be a reduction of 2 Catering officers L2, 2 Team Leaders L6, 1 Senior Day care officer L4 and 2 Domestic Assistants at L1b. There are vacancies in Learning Disabilities service which staff will be encouraged to apply for to reduce the number of job losses  
To cease the weekend service at Farley Day Centre due to very low service take up.  
To provide an effective and value for money services for older people through identifying/ seeking alternative provision to building based day care placements and through the Side by Side Programme and direct payments.

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).
<p><b>Guidance Notes:</b> <i>If you have not yet undertaken any consultation you may wish to speak to the Consultation Team first as a lack of sufficient consultation could place the Council at risk of legal challenge.</i></p> <p><a href="#"><u>Click here for the LBC Consultation Portal</u></a></p> <p>Staff consultation has commenced through meetings both group and individual There is an email system for staff to raise any questions or comments</p>
1.3. Have you carried out any specific consultation with citizens likely to be affected by the proposal? If yes, please insert details, links to documents, as appropriate above. Please show clearly who you consulted with, when you consulted and the outcomes from the consultation. Mitigations from consultation should be clearly shown in Action Plan at end of document.
<p><a href="#"><u>For advice and support from Consultation Team click here</u></a></p> <p>N/a</p>

<b>2. Impacts Identified</b>
<p>2.1. Where you have identified a <b>positive</b> impact, for <b>communities or staff</b>, please outline how these can be enhanced and maintained <b>against each group identified</b>. Specific actions to be detailed in action plan below.</p> <p><i><b>Guidance Notes:</b> By positive impact we mean, is there likely to be a noticeable improvement experienced by people sharing a characteristic?</i></p> <p>There may be a positive impact for the majority of staff who are female as they could move up grades i.e. opportunity for L3's to L4 and L2's going to L3, L7 to M1 and possibly M2 to M3.</p> <p>There will be some older person day care centres remaining open therefore citizens who are eligible to attend will still have their needs met.</p>
<p>2.2. Where you have identified a <b>negative</b> impact please explain the nature of this impact and why you feel the proposal may be negative. Outline what the consequences will be <b>against each group identified</b>. 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.</p> <p><i><b>Guidance Notes:</b> By negative impact we mean is there likely to be a noticeable detrimental effect on people sharing a characteristic?</i></p> <p>There may be a negative impact for groups identified such as women, people over the age of 50 and for people who are white and for people who have a disability</p> <p>The mitigation is that we will enabling affected staff to apply for or be ring-fenced/slotted into vacant posts where possible. Interviews will be guaranteed for those staff who declare a disability.</p> <p>Voluntary redundancy will be considered in the first instance to reduce the number of compulsory redundancy</p> <p>Staff who secure jobs in the new structure will do so with Pay Protection if they secure jobs which are a grade lower than their substantive post.</p>
<p>2.3. Where you have identified a <b>neutral*</b> impact for any group, please explain why you have made this judgement. You need to be confident that you have provided a sufficient explanation to justify this judgement.</p> <p><i><b>Guidance Notes:</b> By neutral impact we mean that there will be no noticeable impact on people sharing a characteristic</i></p> <p>The savings cuts are cross cutting – all services are affected to some extent. The proposal neither favours nor discriminates against group in particular.</p>

## 3. Social & Health Impacts

3.1. If you have identified an impact on community cohesion<sup>4</sup>, tackling poverty<sup>5</sup> or health and wellbeing<sup>6</sup>, please describe here what this may be and who or where you believe could be affected, **Please also ensure that you consider any possible impacts on Looked After Children.**

**Guidance Notes:** Please use this section to describe the social and health impacts and detail any specific actions or mitigations in the action plan below.

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

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

There is a potential impact for staff who secure posts at a lower grade than their substantive post however pay protection will be applied if they secure jobs which are a grade lower

There is potential for staff to be impacted by redundancies however there are vacancies across Provider service which staff could apply for. The interview will be ring fenced where applicable

There is a potential impact on staffs mental health and wellbeing due to potential redundancies however the council has various services available for staff to support them during this time.

Some older person day care centre will be remaining open therefore citizens will still be able to access a service if they have eligible needs

<sup>4</sup> is the proposal likely to have a noticeable effect on relations within and between specific section(s) of the community, neighbourhoods or areas.

<sup>5</sup> 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

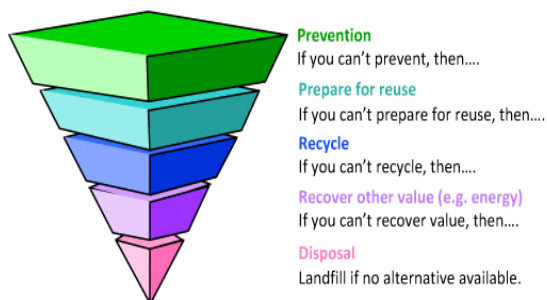
<sup>6</sup> Is the proposal likely to have a positive or negative impact on health inequalities, the physical or mental health and wellbeing of an individual or group, or on access to health and wellbeing services?

## 4. Environment Impacts

4.1. If you have identified any impacts related to the built and natural environment<sup>7</sup>, low carbon<sup>8</sup> and waste minimisation please describe here what this may be and who or where you believe could be affected

**Guidance Notes:** Is the proposal likely to impact on the waste hierarchy which includes issues shown in the table below:

### Waste Hierarchy



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

<sup>7</sup> Is the proposal likely to Impact on the built and natural environment covers issues such as heritage, parks and open space, cleanliness, design, biodiversity and pollution?

<sup>8</sup> Is the proposal likely to impact on low carbon includes issues such as use of energy, fuel and transport.

<b>5. Economic Impacts</b>
<p>5.1. If you have identified any impacts related to Luton's economy and businesses <sup>9</sup>, creating jobs<sup>10</sup> or improving skill levels <sup>11</sup>, please describe here what this may be and who or where you believe could be affected</p>
<p><b>Guidance Notes:</b> Please use this section to describe the social impacts and detail any specific actions or mitigations in the action plan below. 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.</p>
<p><a href="#">For advice and support on Economic Development click here</a></p>
<p>Clearly any job losses are not good for people or the town. The service is hoping to mitigate as far as it can by enabling affected staff to apply for or be ring-fenced/slotted into vacant posts where possible and any staff affected will of course be ring – fenced.</p>

<sup>9</sup> Is the proposal likely to impact on Luton's economy and businesses for example by creating an opportunity to trade with the Council, support new business opportunities?

<sup>10</sup> Is the proposal likely to impact on the creation of new jobs in the local economy? This will also link to health and well-being and the reduction of poverty in the social box.

<sup>11</sup> There are significant skills gaps in Luton's economy. Is the proposal likely to create opportunities for up skilling the workforce or to create apprenticeships?



## Impact Enhancement and Mitigation

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
Vacant posts will be ring-fenced as part of the OCA process	TBC	Catherine Dhokia	Save as many staff and jobs as possible	TBC

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

## Key Contacts

Name	Position
Catherine Dhokia	Interim Service Manager

## Next Steps

- All Executive Reports, where relevant, must have an IIA attached
- All report authors must complete the IIA section of Executive Reports (equalities, cohesion, inclusion, health, economic, business and environment)
- All reports are to be forwarded to the Social Justice Unit, Legal Department, Public Health and Strategy & Sustainability Unit for sign off in time for Executive deadline
- 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

## Useful Documents

### Corporate Plan

<http://intranet/SupportServices/Document%20library/LBC-corporate-plan.pdf>

### Equality Charter

[https://www.luton.gov.uk/Community\\_and\\_living/Lists/LutonDocuments/PDF/Social%20Justice/Equality%20Charter.pdf](https://www.luton.gov.uk/Community_and_living/Lists/LutonDocuments/PDF/Social%20Justice/Equality%20Charter.pdf)

### Social Justice Framework

### Joint Strategic Needs Assessment (JSNA)