

Integrated Impact Assessment Form (IIA)

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 Integrated Impact Assessment (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, eg there is no noticeable impact on characteristics and priorities listed and you are fully confident of this, please contact the Social Justice Unit (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 SJU 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 SJU.

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

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Proposal Title:	Review of Park Services
Lead Officer Name:	Steve Battlebury – Green Space Manager
Date of IIA:	19 November 2019

Finalised IIA Signed and seen by SJU :	
Name:	Maureen Drummond, Cohesion and Equalities Adviser
Date	21 November 2019

Names of all other contributors and stakeholders involved in the preparing of this proposal who have been consulted with and agreed this assessment: <i>(Please note the IIA must not be carried out by one person)</i>	Jane Conway – Operations Manager (Parks and Grounds Maintenance) Rick Donnelley – Operations Manager (Facilities and Business Support) Donna Shaw – HR Adviser
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:	Christina Beddows - Unison Jimmy Cummings - Unite Jason Childs – GMB Hilda Tavorola - GMB

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Proposal outline
<p>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.</p> <p>In 2018, the Parks Service received a high number of customer complaints due to the length of the grass across the public realm causing the leader of the council and the chief executive to demand action to address the situation and avoid a re-occurrence. Action included: investigating more flexible working to cover bank holidays and weekend working during periods of high grass vigour.</p> <p>The Parks Action Group report “Nurturing Skill for 21st Century Parks” identified a loss of core horticultural skills across the industry. This is particularly relevant in Luton Parks Service where the levels of retirement, redundancies and budget cuts have resulted in fewer opportunities to practise planting, pruning and other horticultural activities.</p> <p>The service currently pays overtime to existing employees to deliver games attendant duties and cleaning in sports pavilions; this puts extra financial pressures on the Service and has contributed to some employees breaking the working time directive.</p> <p>In addition, the parks service has a number of buildings within its portfolio and are responsible for ensuring that they are maintained and remain compliant. The Council have recently agreed the demolition of three sports pavilions and retendered the water compliance contract, both of which will affect the current post-holder.</p> <p>The proposal(s) is to review, update and re-evaluate the structure within Parks Services.</p> <p>It is proposed to introduce a dedicated team specifically for grass cutting within the Public Realm which will be programmed to maximise productivity at times of high grass vigour by the introduction of a 48 hour week for 16 weeks March to June this will include Saturday working. There will also be a requirement for the team to work the bank holidays during this period.</p> <p>In addition, it is proposed to introduce skilled posts to provide better progression opportunities and address the loss of core horticultural sector skills.</p> <p>Furthermore, the compliance testing of Parks buildings will be procured through the newly awarded corporate contracts.</p>

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It is therefore proposed to create, delete and revise the following posts. The details are below:

Proposed Post Creations		
Post Title	Grade	FTE
Parks Infrastructure Maintenance Technician	L4	2
Grounds Maintenance Operative	L2	22
Skilled Gardener	L4	3
Skilled Grounds person/ Greenkeeper	L4	2
Specialist Machine Operator	L3	2
Team Leader	L4	3
	Total	34

Proposed post deletions		
Post Title	Grade	FTE
Play Area Technician	L4	2.00
Building Maintenance Assistant	L1b	0.65
Gardener Grounds person	L3	15.00
Charge Hand	L4	5.00
Sports Supervisor	L4	1.00
	Total	23.65

Whilst there are posts deletions every reasonable attempt will be made to secure alternative employment for employees affected by the proposal. It is proposed that employees whose posts are 'at risk' of redundancy through post deletions will potentially be ring fenced or slotted into new posts in the new structure.

Employees whose posts are proposed for deletion with no slot-in or ring-fenced opportunity will be referred to the redeployment process and every reasonable attempt will be made to secure them suitable alternative employment. Changes affecting staff will be in accordance with the Councils Organisational Change Procedure.

Proposed revised job descriptions		
Post title	Grade	FTE
Assistant Operations Support Officer - Buildings & Events	L4	0.57
Assistant Operations Support Officer - Sports & Concessions	L4	1.00
Assistant Gardener Grounds person	L3	11.00
Grounds Maintenance Supervisor	L7	2.00
	Total	14.57

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The posts affected and numbers of employees within these posts are given below:

Post title	Grade	FTE	Headcount	Vacant
Grounds maintenance Supervisor	L7	2.00	2	0
Parks Sports & Concessions Supervisor	L4	1.00	1	0
Parks Buildings & Events Supervisor	L4	0.57	1	0
Play Area Technician	L4	2.00	2	0
Charge Hand	L4	5.00	5	0
Sports Supervisor	L4	1.00	1	0
Gardener Grounds Person	L3	15	14	3
Assistant Gardener Grounds Person	L2	23	12	11
Building Maintenance Assistant	L1b	0.65	1	0
TOTAL		50.22	39 (38.22 FTE)	14

The profile of the affected worker is outlined as follows:

Age Bands		Total
21-25	2	5.13%
26-30	3	7.69%
31-35	4	10.26%
36-40	3	7.69%
41-45	1	2.56%
46-50	3	7.69%
51-55	12	30.77%
56-60	5	12.82%
over 60	6	15.38%
under 21	0	0.00%
Grand Total	39	100.00%

Gender:		Total
Female	4	10.26%
Male	35	89.74%
Grand Total	39	100.00%

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Religion:		Total
Christian	14	35.90%
Hindu	0	0.00%
Muslim	0	0.00%
None	9	23.08%
Other	3	7.69%
Not Known/Declined to Specify	13	33.33%
Grand Total	39	100.00%

Disabled:		Total
No	30	76.92%
Yes	3	7.69%
Not Known/Declined to Specify	6	15.38%
Grand Total	39	100.00%

Sexual Orientation:		Total
Heterosexual	23	58.97%
Not Known/Declined to Specify	15	38.46%
LGBT	1	2.56%
Grand Total	39	100.00%

Ethnic Grouping:		Total
Irish	3	7.69%
British	11	28.21%
White British	11	28.21%
Any other Asian background	0	0.00%
Caribbean	1	2.56%
Bangladeshi	0	0.00%
African	0	0.00%
Pakistani	0	0.00%
Any other ethnic background	4	10.26%
Not Known/Declined to Specify	9	23.08%
Grand Total	39	100.00%

Ethnic Grouping:		Total
White	25	64.10%
BME	5	12.82%
Not Known/Declined to Specify	9	23.08%
Grand Total	39	100.00%

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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 impacts¹, **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					✓	
Sex					✓	
Disability						✓
Sexual orientation						✓
Age					✓	
Religion/belief						✓
Gender reassignment						✓
Pregnancy/maternity						✓
Marriage/civil partnership (HR issues only)						✓
Care responsibilities ² (HR issues only)						
Social and health ³						
Impact on community cohesion						
Impact on tackling poverty						
Impact on health and wellbeing						
Environment						
Impact on the quality of the natural and built environment						
Impact on the low carbon agenda						
Impact on the waste hierarchy						
Economic/business						
Impact on Luton's economy and/or businesses						
Impact on jobs						
Impact on skills						



¹ "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.

² This is a Luton specific priority added to the nine protected characteristics covered under the Equality Act 2010 and takes into account discrimination by association.

³ Full definitions can be found in section 3

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Please answer the following questions:

1. Research and 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.
Click here for local demographics and information
Formal consultation took place with affected staff and Trade Unions between Monday 7 th October 2019 and Tuesday 5 th November 2019.
Consultation comments and questions were received from members of staff at both the staff briefing and the 1 to 1 individual meetings, held in October 2019. All questions were responded to by the Greenspace Manager and, where appropriate, HR was consulted before a full response to questions could be made.
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 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.
Click here for the council Consultation Portal
<div style="display: flex; justify-content: space-around; align-items: flex-start;"> <div style="text-align: center;">  <p>Parks Service OCA version 7.doc</p> </div> <div style="text-align: center;">  <p>Outcome of Consultation - final</p> </div> </div>
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 the document.
For advice and support from Consultation team click here

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The Trade Unions were briefed on the outline proposals on 2 October 2019 and all employees were initially briefed on the proposals at a Staff briefing held on 7 October 2019.

Formal consultation with staff, Unions and stakeholders took place between 7 October 2019 and 5 November 2019. Employees had access to the new proposed job descriptions for roles that will sit in the proposed new structure.

Consultation comments and questions were received from members of staff at both the staff briefing and the 1 to 1 individual meetings. The Greenspace Manager responded to all questions submitted consulting with HR where appropriate.

The main concerns raised during the consultation period related to the change in terms and conditions for the proposed dedicated grass team and the proposed outsourcing of playground inspections.

The outcome of Consultation document summarises all issues considered during consultation.

The process for this organisational change will be managed in line with the Council's Organisational Change Procedure, best practice and employment law. ☐ ☐ ☐ **Impacts identified**

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2. Impacts identified
2.1. Where you have identified a positive impact, for communities or staff , please outline how these can be enhanced and maintained against each group identified . Specific actions to be detailed in action plan below.
Guidance notes: by positive impact we mean, is there likely to be a noticeable improvement experienced by people sharing a characteristic?
None identified
2.2. Where you have identified a negative impact please explain the nature of this impact and why you feel the proposal may be negative. 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.
Guidance notes: by negative impact we mean is there likely to be a noticeable detrimental effect on people sharing a characteristic?
<p>It would appear to be disproportionate in relation to sex (female) and race (BME). This is because the overall figure is approximately 90/10 in favour of female and 64/13 in relation to White British/BME. Therefore, the conclusion at present prior to any final outcome is that it is negative for race and sex.</p> <p>59% of affected staff are in the Age Band 51-55. While access to pension is available at 55, research has indicated that this age band find it more difficult to secure alternative employment in the wider marketplace.</p> <p>The restructuring process will be managed in line with the Organisational Change Procedure to ensure consistency and fairness. Given the number of proposed new roles we do not anticipate any compulsory redundancies although we recognise that in the worst case scenario compulsory redundancies may arise if the affected employees are unable to demonstrate their suitability for the new roles. However, we will be working hard to ensure that suitable alternative employment is offered wherever this is available.</p>
2.3. Where you have identified a neutral* 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.
Guidance notes: by neutral impact we mean that there will be no noticeable impact on people sharing a characteristic.
<p>Neutral Impacts were recorded for all areas apart from the negatives already identified above.</p> <p>The profile of affected employees indicates that there is roughly an even number of employees sharing the characteristics of marriage or that the affected group has a similar profile to the overall workforce profile and there is no evidence to indicate that any negative impact may apply as a result of sharing these characteristics.</p> <p>There are no employees within the affected work group sharing the gender reassignment or civil partnership characteristics.</p>

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3. Social and health impacts

3.1. If you have identified an impact on community cohesion⁴, tackling poverty⁵ or health and wellbeing⁶, 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 and support from the Social Justice Unit click here](#)

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

Employees affected by change may be very concerned for their future. As such this could impact on their health. Employees have been and will continue to be advised of the various support mechanisms that the Council has in place to support employees through periods of change. These include the Trade Unions (if they are a member), Careers support, advice and information is available from the National Careers Service, a confidential support service called Health Assured Ltd (access available 24 hours a day, 7 days a week) and Town Chaplaincy.

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

⁵ is the proposal likely to have a noticeable effect on households that are vulnerable to exclusion, eg due to poverty, low income and/or in areas of high deprivation

⁶ 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?

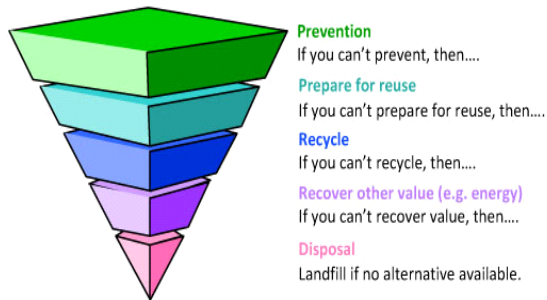
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4. Environment impacts

4.1. If you have identified any impacts related to the built and natural environment⁷, low carbon⁸ 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 and Sustainability team click here](#)

⁷ 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?

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

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5. Economic impacts

5.1. If you have identified any impacts related to Luton's economy and businesses⁹, creating jobs¹⁰ or improving skill levels¹¹, please describe here what this may be and who or where you believe could be affected

Guidance notes: 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.

[For advice and support on Economic Development click here](#)

It is proposed to introduce skilled posts to provide better progression opportunities and address the loss of core horticultural sector skills.

⁹ 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?

¹⁰ 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.

¹¹ 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?

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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
Formal Consultation Meeting	07.10.19	Steve Battlebury Jane Conway Rick Donnelly Donna Shaw	To explain proposals in more detail and respond to initial staff questions
Individual Consultation Meetings	07.10.19 – 05.11.19	Steve Battlebury Jane Conway Rick Donnelly	Respond to employee queries
Respond to consultations questions/representations	07.10.19 to ongoing	Steve Battlebury	To ensure meaningful consideration to all suggestions and comments
Job Evaluation	17.10.19	Steve Battlebury	To
Outcome of Consultation Document Circulated	06.11.19	Steve Battlebury	To inform employees of the outcome and the final proposal
Finalise IIA	19.11.19	Steve Battlebury Donna Shaw	To identify the potential impact on employees and take appropriate action where practical.

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

Key contacts

Name	Position
Steve Battlebury	Greenspace Manager
Jane Conway	Operations Manager (Parks and Ground Maintenance)
Rick Donnelly	Operations Manager (Facilities and Business Support)
Donna Shaw	HR Adviser – Operations Team

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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 SJU, Legal Department, Public Health and Strategy and Sustainability Unit for sign off in time for executive deadline
- On the rare occasion that the SJU are unable to sign off the report, eg 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](#)
- [Equality charter](#)
- [Social Justice framework](#)
- [Joint Strategic Needs Assessment \(JSNA\)](#)