

# APPENDIX C 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 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.**

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<b>Proposal Title:</b>	Library Strategy
<b>Lead Officer Name:</b>	Matthew Hudson
<b>Date of IIA:</b>	01/06/2020

<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>	

<b>Finalised IIA Signed and seen by SJU :</b>	
<b>Name:</b>	Maureen Drummond, Interim Equalities Manager
<b>Date</b>	5 June 2020

<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>	Serena Abel, Lucy Hubber, Helen Barnett, Toni Chivers
<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>	The following persons received this IIA document: <ul style="list-style-type: none"> <li>• Christina Beddows (Unison)</li> <li>• Jimmy Cummings (Unite)</li> <li>• Jason Childs (GMB)</li> </ul>

## 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.

### Proposal

To adopt the modern library strategy (at Appendix A), which has been developed in consultation with local people and focuses on:

- a) aligning the Library offer with strong outcomes to benefit communities;
- b) providing sustainable and safe warm spaces for communities to learn and grow;
- c) enhance and increase the digital offer;
- d) co-locating library services with partner organisations so several services to be accessed in one visit;
- e) increasing the use of trained volunteers;
- f) replacing poorly used library collections; and
- g) seeking investment in libraries to instil civic pride through a modern and vibrant offer.

### Current offer

There are six static libraries in Luton, which offer the full range of core services, and three Library Access Points, which provide access to a collection of books:

- Luton Central Library, St. George's Square, LUTON, LU1 2NG;
- Leagrave Library, Marsh Road, LUTON, LU3 2N;
- Marsh Farm Library, Lea Manor High School, Northwell Drive, LUTON, LU3 3TL;
- Lewsey Library, Landrace Road, Luton, LU4 0SW;
- Stopsley Library, Hitchin Road, Luton, LU2 7UG; and
- Bury Park Library, Bury Park Community Centre, 161 Dunstable Road, Luton, LU1 1BW.
- Library access points:
  - Hockwell Ring Community Centre
  - Chaul End Community Centre
  - Farley Community Centre

In addition, a home library service and a range of virtual resources are also available for Luton residents.

Libraries offer a wide range of services for all ages, including: safe and welcoming spaces; quality book stocks for all ages (including different languages); homework help; activities to encourage reading and cultural engagement; information for local studies; access to a PC and free online resources (including WiFi); informal learning; home library service; membership; concessions; signposting; and functional support such as photocopying. Libraries also work with partners to deliver cross-cutting objectives through different programmes and projects.

### Consultation

To support the development of the Strategy and to help identify what local people need, and to understand how Luton Borough Council can deliver its statutory duty of a 'comprehensive and efficient library service', a survey was designed to capture the views of both users and non-users: 92% of respondents to the Luton Library Needs Survey were library users. The majority of were

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female (66%, n=449/681). Of those respondents that chose to declare sexuality, 93% (n=580/623) were heterosexual. When compared to the population profile of Luton, respondents were over-represented in the age groups 35-44, 45-54 and 55-64 and responses from young people were under-represented. 14% of respondents reported that they or a dependent had a disability, with 83% reporting they were personally disabled. There was a slight over-representation of 'White- British' at 58% (n=384/640) compared to 44.6% for Luton and an under-representation of 'Asian/Asian British – Pakistani' at 4% (n=26/640) compared to 14.4%.

The Library Strategy will be the driver for developing the service to ensure relevance in a digital world in a context of smaller budgets, increased partnerships, shared services and buildings and consortium working, whilst maintaining/developing a modern/high quality library service.

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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 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				X
Religion/Belief			X			X
Gender Reassignment			X			X
Pregnancy/Maternity			X			X
Marriage/Civil Partnership <i>(HR issues only)</i>			X			X
Care Responsibilities <sup>2</sup> <i>(HR issues only)</i>			X			X
<b>Social &amp; Health<sup>3</sup></b>						
Impact on community cohesion	X					
Impact on tackling poverty	X					
Impact on health and wellbeing	X					
<b>Environment</b>						
Impact on the quality of the natural and built environment			X			
Impact on the low carbon agenda			X			
Impact on the waste hierarchy			X			
<b>Economic/Business</b>						
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>
To inform the development of a strategy for the provision of a modern library services, Luton residents were invited to give their views on purpose and quality of current library provision via a Luton Library Needs Survey.

## **Library Services Consultation January 2020**

### **Background**

Library services in Luton are provided by the Culture Trust Luton, with statutory library services under contractual agreement with Luton Council and discretionary library service provision funded through a donation from London Luton Airport Limited (LLAL).

Library services are provided in a range of locations, some standalone and some combined with other provision such as community centres. The estate is in need of modernisation. Library service usage has been falling and the service model has not been reviewed since the contract was awarded.

As part of the development of a strategy for the provision of modern library services to meet the needs of the population of Luton, residents were invited to give their views on purpose and quality of current library provision.

### **Purpose**

To understand the views of Luton residents (library user and non-user) on usage of and satisfaction with current provision and to understand preferences and priority areas for future library service provision.

### **Methods**

Data was collected via a questionnaire available through the Luton Council consultation portal. Hard copies were made available through libraries. The consultation was run for eight weeks in Autumn 2019. The questionnaires asked for quantitative data through fixed response questions, supported by qualitative feedback through free text boxes. A copy of the questionnaire is in Appendix 1.

One survey was spoiled and subsequently was excluded, all remaining questionnaire responses have been included in the analysis, regardless of degree of completion or compliance with response limitations (e.g. respondents were able to select more than the prescribed number of options).

The results were analysed through descriptive analysis of quantitative findings and thematic analysis of qualitative responses. To complete the thematic analysis, the free text comments were initially coded into recurring responses types, which were then grouped into high level themes (see appendix 2). Where possible, data is compared to known library or borough-wide baselines, to give an indication of variation or bias. Analysis was completed by Officers not directly involved in library service provision.

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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 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 LBC Consultation Portal](#)

No consultation of the proposed Library Strategy has taken place at this time. Libraries are incredibly important, and it is important that we engage fully with communities around proposals for rationalisation or transformation of the Library Service, and that they are consulted widely, allowing reasonable time for communities to develop alternative or complementary proposals.

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.

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

No consultation of the proposed Library Strategy has taken place at this time. Libraries are incredibly important, and it is important that we engage fully with communities around proposals for rationalisation or transformation of the Library Service, and that they are consulted widely, allowing reasonable time for communities to develop alternative or complementary proposals.



<p><b>2. Impacts Identified</b></p>
<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><b>Guidance Notes:</b> <i>By positive impact we mean, is there likely to be a noticeable improvement experienced by people sharing a characteristic?</i></p>
<p>The Luton Library Needs Survey revealed responses from young people were under-represented. However, responses revealed libraries provided an important resource for children and young people, especially for school/college study and children’s activities.</p> <p>The library strategy proposes to strengthen the service offer for children and young people. However, given the low level of responses, consideration should be given on how to engage and capture the views of children and young people.</p> <p>Enhancement of the digital library offer to meet the evolving needs of our communities may engage more young people in the library service.</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><b>Guidance Notes:</b> <i>By negative impact we mean is there likely to be a noticeable detrimental effect on people sharing a characteristic?</i></p>
<p>The Luton Library Needs Survey revealed that when compared to the population profile of Luton, respondents were over-represented in the age groups 35-44, 45-54 and 55-64. Therefore any potential reduction or re-location of the library estate and/or access points may disproportionately affect older age groups.</p> <p>One measure to mitigate this is to strategically align the re-provision and/or co-location of library services with other community services, as well as enhancing the home library service. Equally, enhancement of the digital offer will also help to mitigate, as the survey indicated difficulties with using the current systems (i.e outdates, unavailable, complex).</p> <p>Enhancing the digital offer may have a detrimental impact on older age groups who do not use technology, and those experiencing digital poverty. Therefore development of the digital offer will need to ensure accessibility for all in the local population, and doesn’t risk widen inequalities.</p> <p>The potential rationalisation or re-location of a library may negatively impact staff and volunteers. Any proposals to rationalise or relocate libraries will require consultation in accordance with appropriate policies, procedures, and litigation.</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><b>Guidance Notes:</b> <i>By neutral impact we mean that there will be no noticeable impact on people sharing a characteristic</i></p>
<p>The library strategy should have a neutral impact on other protected groups, as current library usage is not over or under-represented by people sharing certain characteristics. Luton Borough Council’s principal objective is to maintain the quality and accessibility of the library service for all through a model that is best able to achieve this in both the short and the long term.</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](#)

The Library Strategy will have an overall positive impact on community cohesion and health and wellbeing through the promotion of providing safe, multipurpose community spaces which are trusted, free and open to all.

Co-locating services will enable more services to be accessed in one place, increasing convenience for residents.

Libraries working more collaboratively with partners to deliver cross-cutting objectives through different community programmes and projects will improve community cohesion.

The Library Strategy aims to deliver libraries that are able to support education, the local economy and play an important role in tackling poverty.

Access to books and the promotion of reading has a significant effect on children's academic skills but also their mental health and wellbeing

The library service will offer signposting to other local services to help with employment, training, adult education opportunities etc.

<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](#)

There is the potential for both positive and negative implications:

- Investing in and improving existing library sites through co-location of services will make them more energy efficient than currently out-dated buildings, for example through improved insulation and instalments. Therefore the new strategy supports more efficient, sustainable and better quality estate. However, any construction involved in renovating and expanding existing sites would produce carbon emissions. As assets potentially become bigger to house more services, more energy will be required to maintain them;
- Equally, any closure or relocation of library sites may require users to travel longer distances by car to access their nearest library service, which will increase emissions. Or alternatively, through an enhanced digital offer people may need to travel less by car to their physical library, thus reducing emissions.
- Furthermore, increasing the home library service could have the impact of reducing the need for car-travel by residents, but simultaneously increase vehicle use for direct delivery of resources to people's houses.

The strategy will support a minimum stance of neutral implications, and ways to mitigate will be part of the consideration of any decisions.

<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.

## 5. Economic Impacts

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

**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](#)

Co-location of services has the potential to reduce long-term demand against the capital budget for repairs and maintenance, which would result in efficiencies.

The new strategy supports lifelong learning and improving skill levels, for example aligning the library offer with strong outcomes to benefit community's e.g. improving literacy in children and increasing number of trained volunteers.

The new strategy aims to deliver a library service that people want to use, ensuring value for money, maximising income generating opportunities through alignment of service, partnership working, and by attracting investment when it is appropriate to do so.

<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
Ensure any proposals on the re-provision or co-location of library services featuring as part of any future transformation planning of the Council's community estate is appropriately consulted upon.	NA	Matthew Hudson	To ensure any proposals for transformation or rationalisation of the community estate consider the value of the library service; strategic alignment of services; environmental impact, and that the Council engage fully with communities around proposals. To ensure they are consulted widely, allowing reasonable time for communities to develop alternative or complementary proposals.	To be enacted as part of the library strategy
Enhance home library service and digital offer, whilst considering those of digital poverty/not computer literate.	NA	Matthew Hudson/ Provider	Notwithstanding the implications of COVID-19, enhancements to the home library service and digital offer features as part of the strategy, and will enhance the service offer to users. Developments will ensure access for all in the local population, and any proposals do not risk widen inequalities.	To be reviewed annually in accordance with the strategy.
Any rationalisation or transformation of the library estate would be subject to comprehensive staff consultation	NA	Matthew Hudson/ Provider	Ensure the provider engages fully with staff on any proposals for the transformation of the Library Service.	To be enacted if there is any proposal to transform or rationalise the library estate.

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in accordance with the appropriate policies and litigation.				
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A review of the action plan will be prompted 6 months after the date of completion of this IIA.

## Key Contacts

Name	Position
Matthew Hudson	Senior Integrated Commissioning Manager

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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 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)