

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)

Proposal Title:	Communications Strategy
Lead Officer Name:	Adam Kearney
Date of IIA:	5 April 2021

Date updated after consultation:	
Early draft Seen by: <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, Equality and Diversity Adviser, 13 April 2021

Finalised IIA Signed and seen by SJU :	
Name:	Maureen Drummond, Equality and Diversity Adviser
Date	14 April 2021

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>	<p>The approach, priorities and work programme has been worked up in consultation with the portfolio holder, Executive members and the Corporate Leadership Team.</p> <p>The strategy is based on best and modern practice as outlined by the Government Communications Service and the Local Government Association.</p>
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:	N/A

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.

The approach to communications is to deliver better planned, well researched, targeted and measureable campaigns which influence and change perceptions and behaviours.

The communications landscape continues to change at pace. Traditional media audiences have been in decline for a number of years, while digital channels continue to evolve and diversify.

Having said that, face-to-face and 'word of mouth' is still an effective and necessary way to reach some communities.

There is no 'one size fits all' method to reaching audiences so we need to be smarter and more strategic in how we communicate. There will be more methodical and evidence-based campaign planning rather than 'blanket' approaches.

We will use existing audience insight and Mosaic information to understand our audiences better and target our campaigns.

To strengthen this we will also undertake a consultation with local communities to gain a better understanding of how different communities prefer to receive information.

Images on our publicity are carefully considered to ensure they reflect the population of Luton. We write in Plain English to ensure messages can be understood, and images, videos and infographics are used so comms can still be understood by those who don't speak any English.

All communications on our website will be fully accessible in line with accessibility legislation.

In addition to mainstream channels, and as part of the new approach, we will ensure community leaders receive vital information in order to relay important messages to their communities (whether written, audio/visual or face-to-face).

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	X					
Sex			X			
Disability	X					
Sexual Orientation			X			
Age	X					
Religion/Belief	X					
Gender Reassignment			X			
Pregnancy/Maternity			X			
Marriage/Civil Partnership (HR issues only)			X			
Care Responsibilities ² (HR issues only)			X			
Social & Health ³						
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	X					
Economic/Business						
Impact on Luton’s economy and/or businesses	X					
Impact on jobs	X					
Impact on skills	X					

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 9 protected characteristics covered under the Equality Act and takes into account discrimination by association.

³ Full definitions can be found in section 3

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 <p>The communications strategy and new approach has been shaped by two recent reviews of communications activity across the council and from best practice recommendations from the LGA and the Government Communications Service (GCS).</p> <p>This approach is based on best practice and frameworks developed by the Government Communications service (GCS) and LG Communications. The plans will be built around the OASIS model championed by the GSC.</p>
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>Guidance Notes: <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>Click here for the LBC Consultation Portal</p>
N/A
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>For advice and support from Consultation Team click here</p>
N/A

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: <i>By positive impact we mean, is there likely to be a noticeable improvement experienced by people sharing a characteristic?</i>
<p>There will be more methodical and evidence-based campaign planning rather than blanket approaches.</p> <p>We will use existing audience insight and Mosaic information to understand our audiences better and target our campaigns.</p> <p>To strengthen this we will also undertake a consultation with local communities to gain a better understanding of how different communities prefer to receive information.</p> <p>As is currently the case, images on our publicity will continue to be carefully considered to ensure they reflect the diverse population of Luton. We write in Plain English to ensure messages can be understood by people where English is not their first language, and images, videos and infographics are used so comms can still be understood by those who don't speak any English and also those who may have a learning disability.</p> <p>In addition to mainstream channels, and as part of the new approach, we will ensure community leaders receive vital information in order to relay important messages to their communities (whether written, audio/visual or face-to-face).</p> <p>In relation to specific religious observance, we will raise awareness through our internal and external comms.</p>
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: <i>By negative impact we mean is there likely to be a noticeable detrimental effect on people sharing a characteristic?</i>
N/A
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: <i>By neutral impact we mean that there will be no noticeable impact on people sharing a characteristic</i>

The approach to communications will be 'as is' for these groups. But as noted above, we will be better able to reach all of our target audiences and positively influence and change behaviours.

3. Social & Health Impacts
<p>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.</p>
<p>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.</p> <p>For advice & support from the Social Justice Unit click here</p> <p>For advice and support from the Public Health team click here</p> <p>Public health campaigns aim to improve health knowledge and personal health choices, thereby improving the health and wellbeing of Luton residents. A more strategic and researched approach will help ensure more successful outcomes. Campaign priorities have been agreed in principle with service managers, service directors, CLT and members.</p> <p>A revamped 'Luton in Harmony' campaign will promote cohesion across the town and The council's events programme (post Covid) will also be promoted to encourage people from different communities celebrate together.</p> <p>It should be noted, however, that public health can be subject to unpredictable demands such as health emergencies, and the need to support commissioned services during times of high demand and this needs to be borne in mind for contingency planning.</p>

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, e.g. due to poverty, low income and/or in areas of high deprivation

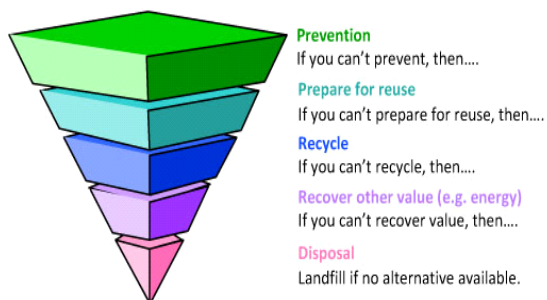
⁶ Is the proposal likely to have a positive or negative impact on health inequalities, the physical or mental health and wellbeing of an individual or group, or on access to health and wellbeing services?

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 & Sustainability Team click here](#)

Campaigns such as #KeepLutonTidy, #WasteLessRecycleMore and #KeepLutonSafe aim to improve the environment. A more strategic and researched approach will help ensure more successful outcomes. Campaign priorities have been agreed with service managers and service directors.

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.

5. Economic Impacts
<p>5.1. If you have identified any impacts related to Luton's economy and businesses ⁹, creating jobs¹⁰ or improving skill levels ¹¹, please describe here what this may be and who or where you believe could be affected</p>
<p>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.</p> <p>For advice and support on Economic Development click here</p> <p>Positive influence and behaviour – ie securing investment into the town to create jobs, increasing people's skills through the promotion of courses run by partner organisations, along with the promotion of council and partner jobs/apprenticeships; targeting this promotion through our various engagement channels to ensure there are equal opportunities .</p>

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?

Integrated Impact Assessment Form (IIA)



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

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

Key Contacts

Name	Position

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

Social Justice Framework

Joint Strategic Needs Assessment (JSNA)