

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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DRAFT

<b>Proposal Title:</b>	Non-statutory children's service redesign
<b>Lead Officer Name:</b>	Amanda Lewis
<b>Date of IIA:</b>	12/08/20 revised 07/01/21

<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, 3 June 2020 3 September 2020 29 September 2020 7 January 2021

<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>	Amanda Lewis Allison Parkinson Damian Elcock John Wigglesworth All of Executive Policy Group Caroline Swindells Paul Joghee Daniel Toth Jane Brown Kate Burchell Nick Chamberlain Teresa Gallagher Sharon Buckby Rosa Quigley-Phipps Paul Cripps Chris Rogers
<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>	Unite, Unison and GMB all unions informed of the OCA on the 14 October 2020. Christina Beddows, Jason Childs

## 1. 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.

### Why do we need to Change?

The council is experiencing unprecedented financial pressure, predominately due to a significant reduction in income from both London Luton Airport Limited but also fees, council tax and business rates as a direct result of Covid 19 restrictions. This leaves the council needing to find £22m of in year savings. All directorates have put forward proposals for savings, children's services proportion of those savings equates to approximately £3.2m and this will significantly reduce services across the Children, Families and Education Directorate. The department also has a further £2.7m of unmet savings from 2019-20 financial year that needs to be achieved, resulting in a total savings target of £5.9m. The impact of the proposal would mean that the local authority would no longer be able to provide universal services. This realignment of resources would strengthen statutory services and increase targeted intervention for the most vulnerable children and families.

### The Proposal

1. This will enable us to fulfil our statutory duties and will evidence how best to amalgamate a number of core services currently delivered across Manor Contact Centre / Early Help and Flying Start.
2. The proposal is based on a careful initial consideration of a number of variables. We are working towards a localities based model aligned with school clusters and the proposed five strategic community areas Central, North, South, East and West. This would support agile working allowing our workforce to be based across the community. We would seek to build on our specialist knowledge and skills to deliver efficiency and avoid duplication. Therefore we will be considering a number of assets utilised for service delivery in local communities; staffing structures; running costs; skills levels across services; growing needs for targeted outcome focused family interventions.
3. A consultation has taken place on the Children's Centres redesign with the public and stakeholders. A further consultation has taken place with staff affected by the proposals as part of the OCA.
4. The proposal is to develop a model of support that encourages families to access and build upon existing family, friends and community networks that aims to empower people to develop their own solutions and goals wherever possible.

We will provide an integrated support service for those vulnerable families identified at levels 3 and level 4 of the Luton threshold document who have:

- Early years children
- Children with special educational needs and disabilities

- Children who need supervised contact
- School-aged children
- Teenage children

To achieve this, our aim is to develop a neighbourhood based Integrated Family Partnership Service delivering a range of different types of support based on need. The proposal is for our practitioners to develop close working relationships with nurseries, schools and other key services to deliver targeted and structured interventions to the most vulnerable children and families in the five neighbourhood areas. The support will be offered in two ways, the first will be directly working with a family or family member on a one to one basis, either at one of the hubs or within the family home and the second through group sessions that would be held at one of the hubs.

We will provide support for vulnerable children, young people and their families with the following:

- Domestic abuse.
- Mental health issues.
- Learning needs or disability.
- Drug and/or alcohol misuse.
- Risk of exclusion or those who already excluded from school and attendance issues.
- Early signs of low level neglect.
- Physical chastisement of a child.

5. Direct family work will be undertaken in line with the 'whole family model' adhering to the following principles already in place for the Troubled Families initiative;

- A dedicated worker or agency helps the family to address the underlying problems as a whole, rather than individual services/agencies responding to the presenting problem of each family member;
- Working with the whole family in a way which recognises how they interact and influence each other rather than viewing them as individuals with a problem;
- Developing a relationship with the family, being persistent and building trust with them in order to challenge them to make the changes they need to, step by step;
- In addition, where necessary, drawing in specialist services in a sequenced way at the right time for the family rather than services being available based on meeting thresholds and availability.

6. The Early Years Alliance (EYA) works in an integrated partnership with Luton Council for the delivery of the 10 year Flying Start Strategy funded through London Luton Airport Limited's Community Investment Fund. As a key long-standing partner agency, staff employed through EYA under the banner of Flying Start, provide specialist staff supplementing the delivery of Luton's family support services alongside integrated staff training and professional continuous development across agencies. The new service will deliver evidence based Parenting Programmes because they aim to ensure that support provided to families is based on sound theory, research and experience of what works best. Parenting programmes will be offered by highly trained facilitators, which meet the needs of the families, and will be completed once a parenting assessment has been completed.

7. This process will follow the OCA process. The broad principles and aims of the envisaged change have been discussed with impacted employees and trade union representatives as part of the OCA process and a QA document answering questions shared on a weekly basis throughout the OCA period (19 October to 18 December 2020). Human Resources have confirmed ring-fencing arrangements. Full details are available in the final OCA document.
8. Council services previously targeting lower levels of needs will be rationalised with a greater emphasis on delivery by the community, voluntary sector and universal services.
9. The proposed service will operate as a locality/hub based model aligned, as far as possible, with the proposed five strategic community areas in development alongside the new TOM.
10. A condensed focused offer will create a streamlined pathway for children and their families to form the new Family Resources Service. The service will be aligned to the Luton Practice Framework Principle:
  - We will use **conversations** to build relationships with children and their families; we will actively listen to both their strengths and what they need help with. We will create the opportunity to have conversations with our professional networks to help us provide the right support at the right time.
  - We will practice with **respectful curiosity** to help us understand the lived experience of children and young people who need our help. We will be curious about the families past experience. We will encourage curiosity across our professional network, helping us to build strong local relationships.
  - We will practice with **courage**, not being afraid to fail and try new things supporting our children and families through change, modelling courageous conversations to challenge without blame. We will use courage to seek feedback on our practice and create a culture of safe challenge.
  - Our practice will be **considerate**, respectful of diversity and difference; we will practice with care to ensure the best outcomes for our children and their families.
11. Realigning the current Early Help provision (excluding resources funded by the Troubled Families Grant) into the specialist Family Resources Service.
12. Consideration will be given to how the community and voluntary sector and partners, such as schools and primary care, can engage and develop the new offer.
13. In order to deliver the need of the Family resources services and continue with some of the key activities previously delivered through Flying Start and Early Help we estimate that there is a requirement of a minimum of 4 buildings which are multi-purpose, including working space for staff and smaller and larger meeting areas for direct and group work.
14. Staff currently work across a minimum of 27 locations to deliver services. The proposed sites meet the criteria for delivery space, office space, for reaching the target groups and accessibility.
15. The table below shows the proposed staffing structure.

Proposed Posts	FTE	Grade

<b>Leagrove Hub</b>		
Practice Manager	1	M5
Practice Lead	4	M3
Senior Performance Analyst	1	M2
Senior Performance Analyst – Stronger Families	1	M1
Senior Family Support Worker	5	L7
Family Support Workers	26	L6
Early Years Support Worker	2	L6
Young Persons Homeless Officer	1	L6
Admin	3	L4
<b>Sub Total</b>	<b>44 posts</b>	
<b>Manor Centre Hub</b>		
Practice Manager	1	M5
Practice Lead	3	M3
Extremism and Safeguarding Practitioner	1	M2
Senior Family Support Worker	5	L7
Immigration Worker	1	L7
Fresh Start Key Worker	0.5	L7
Family Support Workers	25	L6
Missing Co-ordinator	1	L6
Admin	3	L4
<b>Sub Total</b>	<b>40.5 posts</b>	
<b>Total Proposed Posts</b>	<b>84.50 posts</b>	

## Our Service Users

The following is a breakdown by key characteristics of children and young people known to children's social care as, at 31 March 2020:

Sex	Number of cases
Female	835
Male	1100
Unborn	45
Unknown	8
Secure records (blank)	99
<b>Grand Total</b>	<b>2087</b>

Age	Number of cases
Below 1	131
1-5 years old	382
6-10 years old	442
11-15 years old	538
16-20 years old	420
21-24 years old	75
Secure records	99
<b>Grand Total</b>	<b>2087</b>

0-5 - 513

Race	Number of Cases
White	720
Gypsy/Roma or Traveller of Irish Heritage	42
Mixed Background	251
Asian (incl. Chinese)	553
Black	237
Any other ethnic group	37
Refused	1
Information not yet obtained	124
Unknown	23
Secure records	99
<b>Grand Total</b>	<b>2087</b>

1120 BME

Disability	Number of Cases
Yes	468
No	1520
Secure records	99
<b>Grand Total</b>	<b>2087</b>

## Early Help

[Service Users - as at 28 May 2020](#)



*Early Help work with 'households'/families as per the Troubled Families criteria which includes adults*

Sex	Number of cases
Female	484
Male	445
Unborn	7
Unknown	5
Grand Total	941

Age	Number of cases
Unborn	5
Below 1	24
1-5 years old	141
6-10 years old	166
11-15 years old	166
16-20 years old	81
21-25 years old	34
26-30 years old	57
31-35 years old	60
36-40 years old	77
41-45 years old	59
46-50 years old	35
51-55 years old	18
56-60 years old	8
Over 60	10
Grand Total	941

Race	Number of Cases
White	336
Gypsy/Roma or Traveller of Irish Heritage	9
Mixed Background	64
Asian (incl. Chinese)	277
Black	79
Any other ethnic group	17
Information not yet obtained	79
Unknown	80
Grand Total	941

Disability	Number of Cases
Yes	26
No	915
Grand Total	941

Religion	Number of Cases
Atheism	2
Buddhist	1
Christian	91
Muslim	109
None	44
Unknown	694
Grand Total	941

#### Manor Centre Service Users - as at 28 May 2020

##### *Internal Contacts*

Sex	Number of cases
Female	57
Male	59
Unknown	0
Grand Total	116

Age	Number of cases
Below 1	8
1-5 years old	20
6-10 years old	29
11-15 years old	52
16-20 years old	7
Grand Total	116

Race	Number of Cases
White	51
Gypsy/Roma or Traveller of Irish Heritage	1
Mixed Background	29
Asian (incl. Chinese)	28

Black	6
Any other ethnic group	0
Information not yet obtained	1
Unknown	0
<b>Grand Total</b>	<b>116</b>

Disability	Number of Cases
Yes	99
No	17
<b>Grand Total</b>	<b>116</b>

Religion	Number of Cases
Christian	2
Muslim	3
None	7
Unknown	13
<b>Grand Total</b>	<b>25</b>

#### *External Contacts*

Sex	Number of cases
Female	8
Male	17
Unknown	0
<b>Grand Total</b>	<b>25</b>

Age	Number of cases
Below 1	0
1-5 years old	4
6-10 years old	8
11-15 years old	11
16-20 years old	2
<b>Grand Total</b>	<b>25</b>

Race	Number of Cases
White	12
Gypsy/Roma or Traveller of Irish Heritage	0

Mixed Background	4
Asian (incl. Chinese)	0
Black	9
Any other ethnic group	0
Information not yet obtained	0
Unknown	0
<b>Grand Total</b>	<b>25</b>

Disability	Number of Cases
Yes	2
No	23
<b>Grand Total</b>	<b>25</b>

Religion	Number of Cases
Christian	27
Muslim	30
None	29
Unknown	30
<b>Grand Total</b>	<b>116</b>

London Road

*London Road - includes day care and nights in residential*

Sex	Number of cases
Female	11
Male	31
Unknown	0
<b>Grand Total</b>	<b>42</b>

Age	Number of cases
Below 1	0
1-5 years old	0
6-10 years old	7
11-15 years old	27
16-18 years old	8
<b>Grand Total</b>	<b>42</b>

Race	Number of Cases
White	8
Gypsy/Roma or Traveller of Irish Heritage	0
Mixed Background	4
Asian (incl. Chinese)	22
Black	6
Any other ethnic group	1
Information not yet obtained	1
Unknown	0
Grand Total	42

Disability	Number of Cases
Yes	42
No	0
Grand Total	42

Religion	Number of Cases
Agnosticism	0
Atheism	0
Buddhist	0
Christian	11
Hindu	0
Humanism	0
Jewish	0
Muslim	23
None	3
Not Known/Declined to Specify	5
Other	0
Sikh	0
Grand Total	42

*Shared Care*

Sex	Number of cases
Female	17
Male	32
Unknown	0
Grand Total	49

Age	Number of cases
Below 1	0
1-5 years old	7
6-10 years old	20
11-15 years old	18
16-18 years old	4
Grand Total	49

Race	Number of Cases
White	22
Gypsy/Roma or Traveller of Irish Heritage	
Mixed Background	3
Asian (incl. Chinese)	13
Black	9
Any other ethnic group	1
Information not yet obtained	1
Unknown	
Grand Total	49

Disability	Number of Cases
Yes	49
No	0
Grand Total	49

Religion	Number of Cases
Agnosticism	0
Atheism	0
Buddhist	0
Christian	15
Hindu	1
Humanism	0
Jewish	0
Muslim	11
None	8
Not Known/Declined to Specify	14
Other	0
Sikh	0
Grand Total	49

### Our Service Users Children's Centres

The following is a breakdown by key characteristics of children and parents registered with Flying Start Children's Centres as at 31 March 2020:

	Age Group			
Gender	0-4	Teenage Parents	Parents (aged 20+)	Grand Total
Female	8,136	81	15,869	24,086
Male	8,586	4	10,422	19,013
Unknown	61			61
Grand Total	16,783	85	26,291	43,159

The following numbers of women who are registered are currently recorded as being pregnant:

Age Group	Currently Pregnant
20+ age group	537
16-19 age group	20
Grand Total	557

Age/gender breakdown of the under- fives:

Current Age	Female	Male	Unknown	Grand Total
0	1,054	1,106	27	2,187
1	1,447	1,551	9	3,007
2	1,677	1,692	9	3,378
3	1,863	2,087	9	3,959
4	2,095	2,150	7	4,252
Grand Total	8,136	8,586	61	16,783

Ethnicity/age group breakdown:

	Age Group			
Ethnic Group	0-4	Teenage Parents	Parents (aged 20+)	Grand Total
Asian	3,952	6	9,657	13,615
Black	739	3	1,592	2,334
Gypsy/Roma/Traveller of Irish Heritage	11	3	15	29
Mixed	1,023	6	685	1,714
Other	164		433	597
White	3,315	55	7,119	10,489
Not recorded	7,579	12	6,790	14,381

Grand Total	16,783	85	26,291	43,159
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Special Needs & Disability breakdown:

	Age Group			
	0-4	Teenage Parents	Parents (aged 20+)	Grand Total
Special Needs	70	1	64	135
Disabilities	65	1	100	166

The following is a breakdown by key characteristics of children and parents who attended an activity with Flying Start Children's Centres between the period April 2019 to March 2020:

Number of Attendees (individuals)	No of attending families	Total no of Attendances
16,100	7,488	78,921

Age of Attendees:

	0 to 4	5 to 15	16 to 19	20+
Age of attendees	6527	436	75	9062

The 16-19 year age group includes 62 teenage parents.

Pregnant women attendees:

	Teenage Parent	Parent (Aged 20+)
Pregnant	14	496

Ethnicity of Attendees:

	Age Group				
Ethnicity	0-4	5-15	16-19	20+	Grand Total
Asian	2,093	135	11	3,722	5,961
Black	385	12	4	625	1,026
Gypsy/Roma/Traveller of Irish Heritage	6	4	2	7	19
Mixed	530	37	5	282	854
Other	91	1		167	259
White	1,710	102	48	2,762	4,622
Not recorded	1,712	145	5	1,497	3,359
Grand Total	6,527	436	75	9,062	16,100

Special Needs & Disabilities of Attendees:

	Age Group				
	0-4	5-15	16-19	20+	Grand Total



Special Need	21	4	1	15	41
Disability	18	6	1	24	49

The following is a breakdown by key characteristics of children and parents who are open to a Family Worker for one to one casework in Flying Start Children's Centres between the period April 2019 to March 2020:

Age of individuals open as casework:

	Age Group			Grand Total
	0-4	Teenage Parents	Parents (aged 20+)	
Individuals in Cases	1,125	28	1,443	2,596

Pregnant individuals open as casework:

	Teenage Parent	Parent (Aged 20+)
Pregnant	2	43

Ethnicity of individuals open as casework:

Ethnic Group	Age Group			Grand Total
	0-4	Teenage Parents	Parents (aged 20+)	
Asian	386	1	589	976
Black	107	1	128	236
Gypsy/Roma/Traveller of Irish Heritage	1	1	2	4
Mixed	101	0	59	160
Other	22	0	40	62
White	268	22	382	672
Not recorded	240	3	243	486
Grand Total	1,125	28	1,443	2,596

Special Needs & Disabilities of individuals open as casework:

	Age Group			Grand Total
	0-4	Teenage Parents	Parents (aged 20+)	
Special Needs	20	1	9	30
Disability	23	1	16	40

## Our Staff

**Children's Social Care staff including Early Help, Manor Contact Centre and London Road Staff**

The following is a breakdown by key characteristics of all staff in Luton Council and a further breakdown of how many of these staff are in children's services, at 31 March 2020:

Sex	All Luton Borough Council Staff	of which are Children's Services Staff
Female	1846	674
Male	1015	89
Grand Total	2861	763

Age Band	All Luton Borough Council Staff	of which are Children's Services Staff
21-25	159	37
26-30	179	50
31-35	230	68
36-40	296	94
41-45	334	109
46-50	380	112
51-55	461	113
56-60	460	104
Over 60	316	68
Under 21	46	8
Grand Total	2861	763

Race	All Luton Borough Council Staff	of which are Children's Services Staff
BME	723	200
Not Known/ Declined to Specify	573	189
White	1565	374
Grand Total	2861	763

Religion	All Luton Borough Council Staff	
Agnosticism	6	
Atheism	22	
Buddhist	9	
Christian	1166	
Hindu	48	
Humanism	2	
Jewish	7	
Muslim	289	
None	476	
Not Known/Declined to Specify	698	
Other	120	
Sikh	18	
Grand Total	2861	

Consider Disabled	All Luton Borough Council Staff	of which are Children's Services Staff
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No	1906	470
Not Known/ Declined to Specify	710	240
Yes	245	53
<b>Grand Total</b>	<b>2861</b>	<b>763</b>

<b>Sexual Orientation</b>	<b>All Luton Borough Council Staff</b>	<b>of which are Children's Services Staff</b>
Heterosexual	2087	518
LGBT	40	8
Not Known/ Declined to Specify	734	237
<b>Grand Total</b>	<b>2861</b>	<b>763</b>

The following is a breakdown by key characteristics of all staff in Luton Council at 31 March 2020 and a further breakdown of all impacted staff data as at 18 December 2020.

<b>Age Band</b>	<b>All Luton Borough Council Staff</b>	<b>Staff directly impacted by OCA</b>
21-25	159	6
26-30	179	11
31-35	230	19
36-40	296	16
41-45	334	30
46-50	380	25
51-55	461	19
56-60	460	20
Over 60	316	11
Under 21	46	1
<b>Grand Total</b>	<b>2861</b>	<b>158</b>

<b>Sex</b>	<b>All Luton Borough Council Staff</b>	<b>Staff directly impacted by OCA</b>
Female	1846	146
Male	1015	12
<b>Grand Total</b>	<b>2861</b>	<b>158</b>

<b>Race</b>	<b>All Luton Borough Council Staff</b>	<b>Staff directly impacted by OCA</b>
BME	723	50
Not Known/ Declined to Specify	573	19
White	1565	89
<b>Grand Total</b>	<b>2861</b>	<b>158</b>

Religion	All Luton Borough Council Staff	Staff directly impacted by OCA
Agnosticism	6	1
Atheism	22	1
Buddhist	9	0
Christian	1166	66
Hindu	48	4
Humanism	2	1
Jewish	7	2
Muslim	289	25
None	476	32
Not Known/Declined to Specify	698	19
Other	120	7
Sikh	18	0
<b>Grand Total</b>	<b>2861</b>	<b>158</b>
Consider Disabled	All Luton Borough Council Staff	Staff directly impacted by OCA
No	1906	113
Not Known/Declined to Specify	710	37
Yes	245	8
<b>Grand Total</b>	<b>2861</b>	<b>158</b>

Sexual Orientation	All Luton Borough Council Staff	Staff directly impacted by OCA
Heterosexual	2087	134
LGBT	40	0
Not Known/Declined to Specify	734	24
<b>Grand Total</b>	<b>2861</b>	<b>158</b>

### Luton Demographics

As per the most demographics report,:

The official estimate of the population<sup>1</sup> of Luton is 214,100. A combination of a high birth rate and high migration led to an increase in the population in recent years. However, the population has fallen in the last 2 years driven by a decrease in the birth rate and rise in migration out of Luton to other parts

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<sup>1</sup> 2018 Mid-Year Population Estimate, Office for National Statistics 2019

of the UK. With an area of 4,336 hectares, this translates into a population density of 50 persons per hectare, which is greater than many London Boroughs.

The age structure of Luton's population differs from that of the population as a whole. Luton has a younger population than that of the UK. The under 16 age group account for 24 per cent of the Luton population compared with 19 per cent nationally. The 16-64 age group account for 63 per cent of the Luton population, which is the same as the national figure. The 65 and over age group represents 13 per cent of the Luton population compared with 18 per cent nationally.

The town is ethnically diverse, with approximately 55 per cent<sup>2</sup> of the population being of Black and Minority Ethnic (BME) origin, with significant Pakistani, Bangladeshi, Indian, and Eastern European and African Caribbean communities.

In recent years, the diversity of the population has increased. There has been a significant shift in the population, primarily driven by those arriving from newly EU acceded A8 countries of Eastern Europe. Since May 2004, there have been over 25,000 new National Insurance registrations by people from A8 countries in Luton, with over 80 per cent of these coming from Poland. With the change in employment law in 2014 giving Romanians and Bulgarians the right to work in the UK there have been many Romanians coming to live and work in Luton. A study by Mayhew Harper Associates<sup>3</sup> showed concentrations of new communities of Congolese, Somali, Ghanaians, Nigerians, Turks and Zimbabweans in Luton. Foreign students coming to the University of Bedfordshire has also increased diversity. There is increasing acceptance that Luton is a "super-diverse" community.

Luton is currently ranked the 70th most deprived out of 317 local authorities<sup>4</sup>, in 2015 Luton was ranked the 59th most deprived area from 326 local authorities. Therefore Luton is less relatively deprived than in 2015. In 2010, Luton was ranked as the 69th most deprived local authority and in 2007 as the 87<sup>th</sup>. Luton has four output areas in the top ten per cent most deprived areas in the country. These are in Northwell, South and two in Farley. Research by the Centre for Research in Social Policy showed that almost half of children in Luton are living in poverty.<sup>5</sup>

All these factors greatly impact the vulnerable groups of people Children's Services support.

## 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>6</sup>, **positive**, **negative** or **neutral**, on the community and/or staff as a result of your proposal.

<sup>2</sup> 2011 Census, Office for National Statistics

<sup>3</sup> The Growth and Changing Complexion of Luton's Population, Mayhew Harper Associates, 2011

<sup>4</sup> 2019 Indices of Multiple Deprivation, Ministry of Housing, Communities & Local Government.

<sup>5</sup> Child Poverty Local Indicators 2018 Update, Centre for Research in Social Policy, Loughborough University

<sup>6</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.

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
Sexual Orientation			x			x
Age		x			x	
Religion/Belief		x				x
Gender Reassignment		x				x
Pregnancy/Maternity						x
Marriage/Civil Partnership (HR issues only)		x				x
Care Responsibilities <sup>7</sup> (HR issues only)		x				x
Social & Health <sup>8</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			x			
Economic/Business						
Impact on Luton's economy and/or businesses			x			
Impact on jobs		x				
Impact on skills		x				

Please answer the following questions:

## 2. Research and Consultation

<sup>7</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>8</sup> Full definitions can be found in section 3

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](#)

This assessment has been built based on the most recent demographics report taking into consideration the demographics of our service users and the staff cohort

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](#)

The senior leadership team have reviewed the establishment to consider how we can move resources around to meet the requirements of the improvement activity within the new financial envelop identified by the Council

Further work will be undertaken to look at the overall design of our services to reduce transition points and to ensure we are optimising our resources for effective outcomes for children.

Further work is required to ensure that there is minimal impact on current services users with protected characteristics – race, pregnancy, disability, - and impact on health and wellbeing to ensure that capacity of alternate providers or collaboration with alternative providers across Luton is sufficient to meet needs. This will need to be undertaken during the consultation period and as part of the movement to a new model of working.

#### **Update – 28 September 2020**

Staffing across Flying Start, Manor Road Contact Centre, London Road Centre, Early Help, Children with Disabilities, Assessment, Fostering and Adoption and Family Safeguarding Services will be directly impacted by this proposal. Over 100 staff will be impacted.

#### **Staff consultation    OCA staff consultation 19 October – 18 December 2020**

Consultation with Staff, unions in line with national and Luton employment policies needs to be undertaken and is planned to start on the 19 October for 45 days.

#### **Public consultation the 3 of August - 20 September 2020**

Consultation was undertaken with key stakeholders including partners, service users and the general public in line with the Gunning Principles and duty to consult. An online consultation went live on the 3 of August 2020.

Five Public Consultations took place using the ZOOM platform. These took place on the 13 August (1pm to 3pm and 6.30pm to 8.30pm), the 7 September 2020 (2pm to 4pm), the 8 September (6.30pm to 8.30pm) and on the 17 September 10.00am-11.30am.

The consultation was available in hard copy from the Central Library and directly from Children Centres for anyone who was unable to access the online version. The consultation document was translated into the 6 most widely spoken community languages (Urdu, Bengali, Gujarati, Punjabi, Romanian and Polish), an easy read version was also available. An inbox and phone line was made available for any questions or queries including requests for translation not covered above. The consultation was widely publicised on Social Media platforms (Facebook and Twitter) and our children's centre staff contacted each service user via email, text, letter (where no other way was available) and by phone and offered support to complete the consultation.

The overarching consensus was that any change to the service provision would have a negative impact on children, young people and their families.

Questions and answers from these sessions are available on the website using this link [frequently asked questions](#)

#### **Update – 7 January 2021**



The OCA period ended on 18 December 2020, with no major changes proposed to the envisaged model. Family Wellbeing Service (Integrated Family Partnership Service – we are planning to consult with service users on the name).

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](#)

Analysis of the public and stakeholder consultation was presented to Policy Group on 6 October 2020 an extraordinary Policy Group Meeting was subsequently held on 16 October for further discussion, with a follow up progress update being presented at Policy Group on 7 January 2021 and Children Services Scrutiny Group will discuss the redesign on 21 January 2021. The outcomes of both the public consultation and staff OCA have not materially changed the direction of the redesign proposal. However, the staff OCA did raise some challenges around specialisms that did remove the London road staff from scope and clarified qualifications required for Management roles.

The Executive will make the final decision on 9 February 2021.

### 3. Impacts Identified

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?

Positive impacts for communities have been identified for:

- **Disability** – We believe that this cohort of service users will benefit from the new integrated services, supporting our children with disabilities/ EHCP. However, work will need to be undertaken to ensure effective pathways are in place and that we maximise the opportunities arising from Transforming Care.
- **Age** – A greater focus is on targeted support, thereby ensuring we have effective multidisciplinary teams working with families with children of all ages.
- **Care responsibilities**. Services will provide additional targeted/specialist interventions as part team around the child and family/carer

Positive impacts for staff have been identified for:

- those who secure a role in the new service that is proposed.
  - those whose Voluntary Redundancy requests are approved.
- NB

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?

**Pregnant/Maternity** - Universal service users will be directly impacted with the removal of Flying Start centres. Particularly those pregnant or with new-borns, unless they are identified as requiring additional support at level 3 or level 4. Statutory health services will continue to provide a service to pregnant women and those with new-borns at a universal level. It will be particularly important to understand what the community is already providing in this space and to ensure that the community are sufficiently supported to develop universal offers and to confirm how this will dovetail to the primary care integrated networks.

### **Age and Race (BAME)**

Universal preventive services to support children and families health and wellbeing will be directly impacted with the removal of Flying Start centres

Luton is currently ranked the 70th most deprived out of 317 local authorities, and 85<sup>th</sup> for Health outcomes (measures the risk of premature death and the impairment of quality of life through poor physical or mental health).<sup>9</sup> Luton is a super-diverse town and one of only three majority non White British towns in the UK. Children centres are also funded by Public Health to provide an integrated prevention / early intervention support to families in partnership with Cambridge Community Services Health Visitors 'Healthy Child Programme'. Child health clinics are collocated in Flying Start children Centres enabling the child and their family to access clinical and non-clinical support (funded by Public Health), for example parenting, support with sleep, feeding etc. for the child. This integrated offer to children and families has demonstrated effective reach and engagement, especially with our diverse population. Cessation of this well-established integrated community model for families may negatively impact access and uptake from our vulnerable families, and potentially increase need for further Services later. Evidence suggests that some BAME groups may be more adversely impacted if these Services are less accessible<sup>10</sup>, inability to travel for those living in poverty or are experiencing deprivation.

This will also impact delivery of Luton's Population Wellbeing Strategy 2019 to 2024<sup>11</sup> first priority that is 'Starting and developing well – where we lay the foundations for a healthy life'. Reducing preventative Services and provision closer to home could affect families' abilities to uptake healthy choices. We know that the social and economic environment in which we are born, grow up, live, work and age, as well as the decisions we make for ourselves and our families collectively have a bigger impact on our health, and subsequent health inequalities, than health care alone<sup>12</sup>.

The public health budgets are also subject to savings and so any new model will not directly replicate current provision. In line with current plans, the public health investment in this area will be reduced by 40% for 2021/22.

Negative impact for staff have been identified for:

- the L3 Support Workers from Flying Start Children Centres, as no alternative roles identified for them in the new structure, however they will be able to apply for any remaining vacant L6 Family Workers posts, but outside of the ring fenced arrangements, due to the three-grade differential, having to satisfy all the essential criteria to secure an interview.
- Age as a third of the workforce are 51 or over, although 31 of these are able to access their non-reduced pensions.

- Women as they make up 90% of the affected people although this is indicative of the composition of the workforce within Children's services.
- BAME as a slightly higher percentage of the group compared to the council median.

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

The following areas have been identified as having a neutral impact on communities:

- Sexual Orientation
- Religion/Belief
- Gender Reassignment
- Marriage/Civil Partnership

Neutral impact for staff have been identified for:

- Those employees who have been able to retain employment on their current remuneration or in a role one grade lower with 18 months' Pay Protection.  
NB  
Due to the numbers of leavers it is hoped as the ring fenced pools have diminished, that we will be able to slot people in without the need for interviews now
- Secondly, for those Family Workers from Flying Start Children Centres, who are currently on Term Time Only contracts, who cannot work 52 weeks, will be entitled to a redundancy payment, as it is not considered Suitable Alternative Employment.  
NB  
All new contracts will be offered on 52 weeks with employees able to put in flexible working requests as required.

<sup>9</sup> <https://www.luton.gov.uk/Environment/Lists/LutonDocuments/PDF/Planning/Observatory/2019-indices-of-multiple-deprivation-in-luton.pdf>

<sup>10</sup>

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/730917/local\\_action\\_on\\_health\\_inequalities.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/730917/local_action_on_health_inequalities.pdf)

<sup>11</sup>

[https://www.luton.gov.uk/Council\\_government\\_and\\_democracy/Lists/LutonDocuments/PDF/CPC/CPC%2020/Population-wellbeing-strategy-2019-2024.pdf](https://www.luton.gov.uk/Council_government_and_democracy/Lists/LutonDocuments/PDF/CPC/CPC%2020/Population-wellbeing-strategy-2019-2024.pdf)

<sup>12</sup> <https://www.gov.uk/government/publications/health-profile-for-england-2018/chapter-6-wider-determinants-of-health>

#### 4. Social & Health Impacts

If you have identified an impact on community cohesion<sup>13</sup>, tackling poverty<sup>14</sup> or health and wellbeing<sup>15</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](#)

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<sup>13</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>14</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>15</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?

In the short term, families will have limited availability to access universal type services.

Professionals will not have the early surveillance that supported the identification of emerging needs, and the ability to mix with families from their local area as before, this could impact negatively on families with emerging vulnerabilities. However, the redesign would offer increased targeted interventions to the most vulnerable families in the Borough and would sign post families that did not need that level of support.

As the new service develops, some of this can be mitigated against through continuing delivery by other Flying Start partners of their universal offer, but the impact is likely to be negative. Work is ongoing with colleagues in Public Health and other partner agencies to put in place additional mitigations.

We aim to maximise the opportunities being developed under the BLMK partnership and these could have a positive impact on the health and wellbeing of communities.

In respect of social cohesion, a positive impact is expected through capacity building of the community and third sector, and strengthened relationship across the public, third and first sectors as set out in the 2040 strategy.

Tackling poverty is a clear priority under 2040 and Children's Services will continue to work towards the delivery of this strategy.

It is acknowledged that staff job losses impacted negatively on the affect member of staff, their family and the wider community, the council has sought to minimise this impact in the following ways.

The council has run separate 'Voluntary Separation' and 'Voluntary Redundancy' schemes for impacted staff, also a the large number of vacancies, as some staff take up opportunities with other organisations, have not been filled, should mean that the number compulsory redundancies is kept to a minimum.

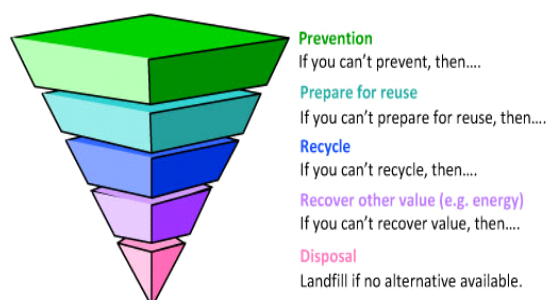
Staff are advised to seek additional support if this is required and can access the Employee Support Programme provided by Health Assured Limited and have access to the Town Chaplaincy Team who offer a confidential, independent, non-judgemental listening ear to anyone regardless of faith or no faith.

## 5. Environment Impacts

If you have identified any impacts related to the built and natural environment<sup>16</sup>, low carbon<sup>17</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](#)

No positive or negative environmental impacts identified.

## 6. Economic Impacts

If you have identified any impacts related to Luton's economy and businesses<sup>18</sup>, creating jobs<sup>19</sup> or improving skill levels<sup>20</sup>, please describe here what this may be and who or where you believe could be affected

<sup>16</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>17</sup> Is the proposal likely to impact on low carbon includes issues such as use of energy, fuel and transport.

<sup>18</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>19</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>20</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?

**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](#)

The council has run separate 'Voluntary Separation' and 'Voluntary Redundancy' schemes for impacted staff, also a the large number of vacancies, as some staff take up opportunities with other organisations, have not been filled, should mean that the number compulsory redundancies is kept to a minimum.

All employees who are at risk of redundancy will also have the opportunity to be placed on the redeployment list following their 'at risk' meeting should they choose.

Staff are advised to seek additional support if this is required and can access the Employee Support Programme provided by Health Assured Limited and access careers advice from the National Careers Service.

Pay protection will apply for those staff who are successful in the Ring Fenced interviews for roles one grade lower than their current position.

The new service will provide the opportunity for additional training and development for staff as roles expand and opportunities to gain specialisms increase.

### 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
Consultation with members of the public	20/09/2020	Damian Elcock	To engage service users and other stakeholders to hear views and ideas to influence the design of the service delivery model.	Ongoing
Staff consultation (OCA)	18/12/2020	Damian Elcock	To engage staff to hear views and ideas on the proposals and potential changes.	18/12/2020



Action	Deadline	Responsible Officer	Intended Outcome	Date Completed/ Ongoing
Review negative impacts	31/01/2021	Damian Elcock	To consider the negative impact identified the consultation processes	Ongoing
<b>Note: the above actions are reflective of the positive impact areas identified in this impact assessment. Detailed actions and timeframes for delivery can be found in the overarching improvement plan</b>				

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

#### Key Contacts

Name	Position
Amanda Lewis	Corporate Director
Allison Parkinson	Service Director
Damian Elcock	Service Director
John Wrigglesworth	Service Director

### 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 \(JSNA\)](#)