

## Appendix 2 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.**

## Appendix 2 Integrated Impact Assessment Form (IIA)

<b>Proposal Title:</b>	Revised Council Tax Reduction
<b>Lead Officer Name:</b>	Clive Jones
<b>Date of IIA:</b>	29 <sup>th</sup> May 2020

<b>Date updated after consultation:</b>	
<b>Early draft Seen by:</b> <i>(Please send an early draft of your IIA to the SJU to ensure all impacts are being considered at the appropriate time)</i>	Maureen Drummond, Interim Equalities Manager, 3 June 2020

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

### 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.

This IIA will consider the premise that Corporate Leadership Management Team agree to the options for consultation on the Council tax Reduction Scheme for 21/22, to go out to consultation between August 2020 and October 2020 to ensure the scheme remains affordable and targets support to the most financially vulnerable.

Information supporting the proposal (**who, what, where, how<sup>1</sup>**)

Analysis commissioned by the Council identifies that couples with children, lone parents and tenants living in private rented properties are likely to be amongst the groups most negatively financially impacted after the April 2016 welfare reform changes have been applied. Of those most highly impacted, those in work are the largest group (c.60%), with lone parents, carers and disabled people relatively equally sharing the remaining proportion (c.40%) of those most highly impacted. The working age cohort consists of circa 8,000 households, comprising of circa 8400 children. These currently have circa £1.3m in council tax arrears.

With COVID-19 the demographics of the population is changing and all household types are being impacted by this pandemic. The Council finds itself also in a very difficult financial position. It is facing a £49m budget gap due to the pandemics impact. The proposal is to now look at distributing support to all household types equally and as a consequential effect increasing funding to households in the lowest income range that are single or couples with no children while bringing the other households in this range down to a 10% lower amount of support. This evidence would suggest that the current CTR is not distributing support equally to all household types. A review of the scheme is necessary for the scheme to be assured as remaining affordable and supporting all financially vulnerable households.

## **Impact of full roll out of Universal Credit in Luton and CTR;**

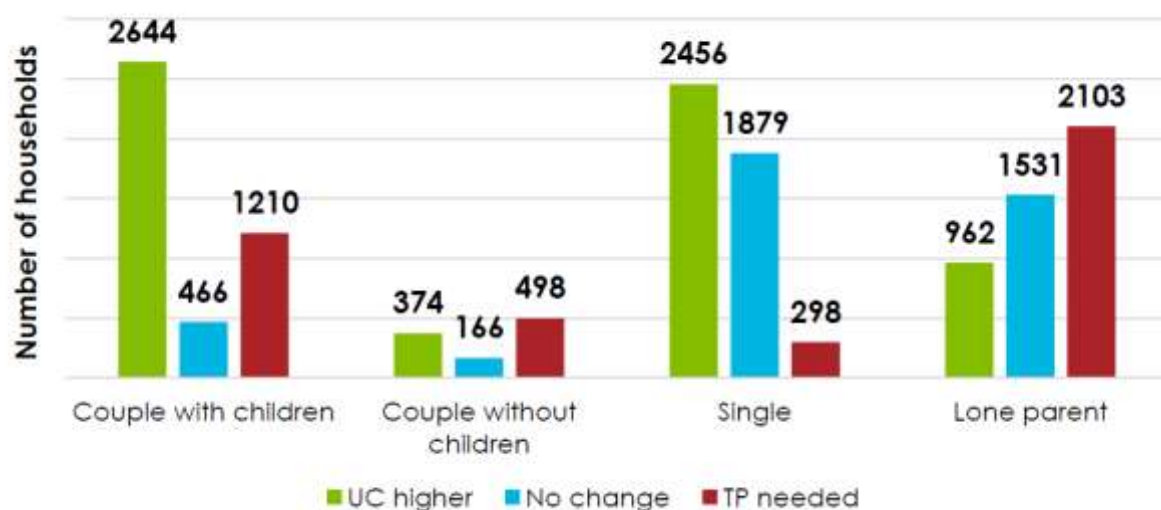
There are circa 8,000 claimants (as of April 2020), in Luton on Universal Credit (Any changes to CTR need to cater for a mixed set of claimant circumstances).

The Governments decision to cut local authority spending to support the service going forward means that the 37% grant budget impact for the service that delivers CTR (and Housing Benefit) is £254,000.

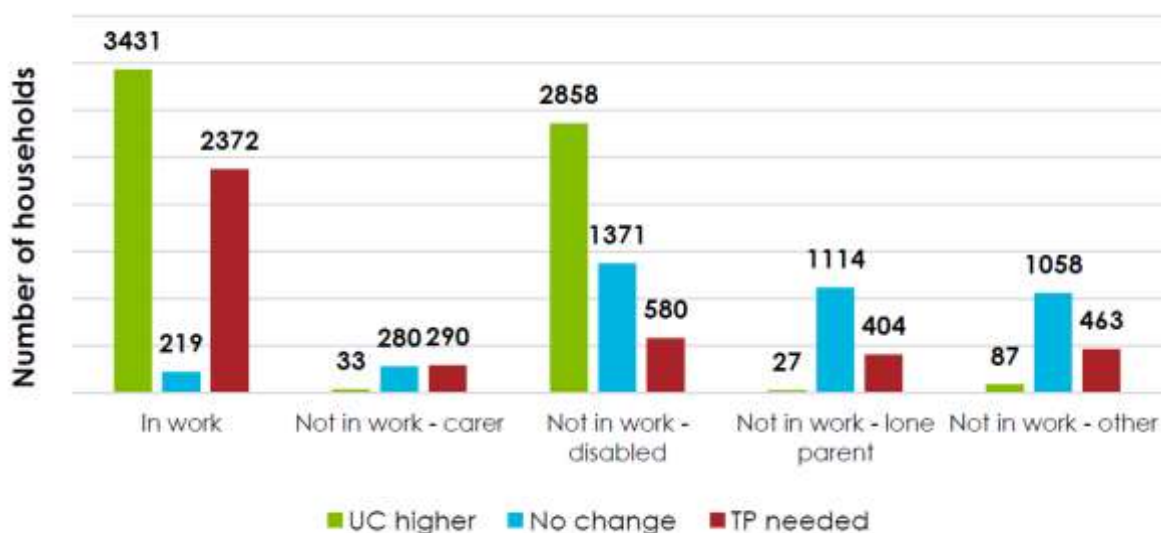
## **The impact of Universal Credit on household income, by household type**

<sup>1</sup> Breakdown of present users by ethnicity, age, gender, disability, religion/belief, sexuality (if recorded)  
Also, 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 impact of Universal Credit on household income, by economic status



This information should also be considered alongside our known information about poverty levels in the Town and the number of children affected. Our updated child poverty needs assessment confirmed that an estimated 16,000 children are in poverty in the Town, the number of food bank parcels given out continues to increase.

In the latest report from the Luton's Foodbank on a set of KPIs, the report stated in regard to households and the number of those requesting help for the period December 2019;

### Peak month comparison

Period	Total parcels	YoY diff	Parcels for children
December 2017	790		42%
December 2018	950	+20%	39%
December 2019		+22% estimated	

## The revised CTR Scheme:

The Council in proposing the CTR scheme in 2021 will be as shown in the table below. This option has the following characteristics:

- Reduces excess income range 1 from 90% to 80% for households with disabled resident, children or carers.
- Reduces excess income range 2 from 70% to 60% for households with disabled resident, children or carers.
- Improves excess income range 1 for single and couples without children households by 5% from 75% to 80%
- Removes excess income ranges 5 and 6 that were only receiving 5% support. Simplifying the scheme down to 4 bands from 6.
- Lowers the excess income allowed to £50 from £80.
- Mitigation through the flexible support fund remains.
- Makes available funding of around £500,000 to use in meeting the budget gap.

## Current Scheme

Working age households	Excess income range 1 £0-£14.99	Excess income range 2 £15-£29.99	Excess income range 3 £30-£49.99	Excess income range 4 £50-£69.99	Excess income range 5 £70-£79.99	Excess income range 6 £80 and above
Households with children or carer or disabled resident	90%	70%	40%	15%	5%	0%
No of claimants	5267	289	453	338	0	0
Other households	75%	60%	40%	15%	5%	0%
No of claimants	1419	150	58	44	0	0

## Proposed Scheme

Working age households	Excess income range 1 £0-£14.99	Excess income range 2 £15-£29.99	Excess income range 3 £30-£49.99	Excess income range 4 £50 and above	Excess income range 5 £70-£79.99
Households with children or carer or disabled resident	80%	60%	40%	0%	0%
No of claimants	5267	289	453	0	0
Other households	80%	60%	40%	0%	0%
No of claimants	1419	150	58	44	0
Saving	£551,303.34	£35,626.27	£0.00	£74,586.37	£0.00

Yellow indicates where the proposal is different to the existing CTR scheme.

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This option will save the Council an estimated £587k based on current claimant numbers. Anything over £500k in savings will be allocated to the flexible support fund enabling anyone negatively impacted by the changes to apply for additional support.

A breakdown by excess income range and council tax band of the number of households that would lose or gain under the proposed option is provided below:

Working age households with a disabled resident or children or carer.

Excess income range 1

Council tax band	Number of claims	Council tax		£0 - £14.99 Excess income range 1 percentage	Average award	Average weekly amount left to pay	Average weekly increased payment	Total Saving
Band A	2432	£ 1,233.13	Current	90%	£913	£6.15	£1.95	£246,826
			Proposed	80%	£812	£8.10		
Band B	1960	£ 1,438.66	Current	90%	£1,141	£5.73	£2.44	£248,446
			Proposed	80%	£1,014	£8.17		
Band C	689	£ 1,644.17	Current	90%	£1,336	£5.93	£2.85	£102,282
			Proposed	80%	£1,188	£8.78		
Band D	150	£ 1,849.70	Current	90%	£1,483	£7.04	£3.17	£24,723
			Proposed	80%	£1,319	£10.21		
Band E	33	£ 2,260.74	Current	90%	£1,797	£8.93	£3.84	£6,588
			Proposed	80%	£1,597	£12.76		
Band F	3	£ 2,671.79	Current	90%	£1,535	£21.86	£3.28	£512
			Proposed	80%	£1,364	£25.14		
Total	5267		Proposed	80%			£2.92	£629,377

Working age households with a disabled resident or children or carer.

Excess income range 2

Council tax band	Number of claims	Council tax		£15 - £29.99 Excess income range 2 percentage	Average award	Average weekly amount left to pay	Average weekly increased payment
Band A	115	£ 1,233.13	Current	70%	£749.81	£9.29	£2.06
			Proposed	60%	£642.70	£11.35	
Band B	115	£ 1,438.66	Current	70%	£884.15	£10.66	£2.43
			Proposed	60%	£757.84	£13.09	
Band C	49	£ 1,644.17	Current	70%	£1,014.88	£12.10	£2.79
			Proposed	60%	£869.90	£14.89	
Band D	10	£ 1,849.70	Current	70%	£1,174.92	£12.98	£3.23
			Proposed	60%	£1,007.07	£16.20	
Total	289		Proposed	60%			£2.63

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Working age single or couple with no children households.  
Excess income range 1

Council tax band	Number of claims	Council tax		£0 - £14.99 Excess income range 1 percentage	Average award	Average weekly amount left to pay	Average weekly decreased payment
Band A	767	£ 1,233.13	Current	75%	£738.98	£9.50	-£0.95
			Proposed	80%	£788.25	£8.56	
Band B	448	£ 1,438.66	Current	75%	£873.25	£10.87	-£1.12
			Proposed	80%	£931.46	£9.75	
Band C	170	£ 1,644.17	Current	75%	£1,015.55	£12.09	-£1.30
			Proposed	80%	£1,083.26	£10.79	
Band D	24	£ 1,849.70	Current	80%	£1,066.95	£15.05	-£1.37
			Proposed	80%	£1,138.08	£13.69	
Band E	8	£ 2,260.74	Current	75%	£1,444.51	£15.70	-£1.85
			Proposed	80%	£1,540.81	£13.84	
Band F	1	£ 2,671.79	Current	75%	£1,039.04	£31.40	-£1.33
			Proposed	80%	£1,108.31	£30.07	
Band G	1	£ 2,671.79	Current	75%	£2,238.28	£8.34	-£2.87
			Proposed	80%	£2,387.50	£5.47	
Total	1419		Proposed	80%			-£1.54

### Over £100 in council tax arrears by household type

Type	Number of other households on CTR	Disabled resident households on CTR	Average dept	In crisis
Single	350	601	£ 703.75	18
Couple	31	74	£ 855.90	3
Lone parent	400	177	£ 573.33	7
Couple with children	135	102	£ 712.04	1
Total	916	954	£ 711.26	29

In crisis is where the household income does not cover the rent.



## 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>2</sup>, **positive**, **negative** or **neutral**, on the community and/or staff as a result of your proposal. The rest of the questions on this form will help you clarify impacts and identify an appropriate action plan.

Protected Groups	Citizens/Community			Staff (for HR related issues)		
	Positive	Negative	Neutral	Positive	Negative	Neutral
Race			X			X
Sex			X			X
Disability		X				X
Sexual Orientation			X			X
Age		X				X
Religion/Belief			X			X
Gender Reassignment			X			X
Pregnancy/Maternity			X			X
Marriage/Civil Partnership (HR issues only)			X			X
Care Responsibilities <sup>3</sup> (HR issues only)		X				X
Social & Health <sup>4</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			

<sup>2</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>3</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>4</sup> Full definitions can be found in section 3

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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="#">Click here for local demographics and information</a> <a href="http://www.counciltaxsupport.org">www.counciltaxsupport.org</a> <a href="http://www.cpag.org.uk/content/welfare-reform-early-impacts">http://www.cpag.org.uk/content/welfare-reform-early-impacts</a> <a href="https://www.jrf.org.uk/report/impact-welfare-reform-social-landlords-and-tenants">https://www.jrf.org.uk/report/impact-welfare-reform-social-landlords-and-tenants</a>  <a href="https://www.gov.uk/government/publications/ssac-occasional-paper-12-the-cumulative-impact-of-welfare-reform-a-commentary">https://www.gov.uk/government/publications/ssac-occasional-paper-12-the-cumulative-impact-of-welfare-reform-a-commentary</a>
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).
<b>Guidance Notes:</b> <i>If you have not yet undertaken any consultation you may wish to speak to the Consultation Team first as a lack of sufficient consultation could place the Council at risk of legal challenge.</i> <a href="#">Click here for the LBC Consultation Portal</a>
See consultation page on <a href="http://luton.gov.uk">luton.gov.uk</a> . Consultation will start on the 1 September and end on the 3 November 2020
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.
<a href="#">For advice and support from Consultation Team click here</a>
Consultation carried out between August 2020 and October 2020 with Luton residents has been. Feedback from the consultation is as follows:

<b>2. Impacts Identified</b>
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.
<i><b>Guidance Notes:</b> By positive impact we mean, is there likely to be a noticeable improvement experienced by people sharing a characteristic?</i>
There is no evidence currently available to suggest that the Policy will have a noticeable impact, either positive or negative, on working age single or couples without children households.
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.
<i><b>Guidance Notes:</b> By negative impact we mean is there likely to be a noticeable detrimental effect on people sharing a characteristic?</i>
Those who could be negatively affected by loss of council tax reduction are individuals in households with a disabled resident, children or carer with an excess income that places them in excess income range 1 or 2.  This loss on its own may, or may not, be a manageable loss to an individual – each person has individual circumstances. However, these losses are part of an ongoing change to welfare reform, which will have an impact on people's finances.  <b>Mitigation:</b> The flexible support fund helps households and people with disabilities to obtain the skills and support they need to increase their household income and reduce or remove them from needing to access CTR altogether.
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.
<i><b>Guidance Notes:</b> By neutral impact we mean that there will be no noticeable impact on people sharing a characteristic</i>
There is no evidence currently available to suggest that the Policy will have a noticeable impact, either positive or negative, on people of pensionable age.

<p><b>3. Social &amp; Health Impacts</b></p>
<p>3.1. If you have identified an impact on community cohesion<sup>5</sup>, tackling poverty<sup>6</sup> or health and wellbeing<sup>7</sup>, please describe here what this may be and who or where you believe could be affected, <b>Please also ensure that you consider any possible impacts on Looked After Children.</b></p>
<p><b>Guidance Notes:</b> 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><a href="#">For advice &amp; support from the Social Justice Unit click here</a></p> <p><a href="#">For advice and support from the Public Health team click here</a></p> <p>As the IIA shows above those most affected by the economic situation and welfare reform is lone parents. Financial difficulties/hardship can have a profound impact on people's mental health and emotional wellbeing; therefore the choices put to the public have to also consider the outcome for such families/individuals.</p> <p><b>Mitigation:</b> The flexible support fund helps households and people with disabilities to obtain the skills and support they need to increase their household income and reduce or remove them from needing to access CTR altogether.</p>

<sup>5</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>6</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>7</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>8</sup>, low carbon<sup>9</sup> and waste minimisation please describe here what this may be and who or where you believe could be affected

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

### Waste Hierarchy



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

<sup>8</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>9</sup> Is the proposal likely to impact on low carbon includes issues such as use of energy, fuel and transport.

<p><b>5. Economic Impacts</b></p>
<p>5.1. If you have identified any impacts related to Luton's economy and businesses <sup>10</sup>, creating jobs<sup>11</sup> or improving skill levels <sup>12</sup>, please describe here what this may be and who or where you believe could be affected</p>
<p><b>Guidance Notes:</b> Please use this section to describe the social impacts and detail any specific actions or mitigations in the action plan below. Please detail all actions that will be taken to enhance and maintain positive impacts and to mitigate any negative impacts relating to this proposal in the table below.</p> <p><a href="#">For advice and support on Economic Development click here</a></p>
<p>The flexible support fund helps households and people with disabilities to obtain the skills and support they need to increase their household income and reduce or remove them from needing to access CTR altogether</p>

<sup>10</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>11</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>12</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?

## Appendix 2 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
Scheme approved by Executive	February 2021	Clive Jones	Scheme recommended to Full Council for adoption	
Scheme adopted by Full Council	February 2021	Clive Jones	Scheme adopted	

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

### Key Contacts

Name	Position
Clive Jones	Head of Revenues and Benefits

### 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)