

IIA on Assisted Transfer Scheme Integrated Impact Assessment Form (IIA) June 2012



This form replaces the previous Equality Impact Assessment form used by LBC.

The key aim of an impact assessment is to ensure that all Council policies, plans and strategies support the corporate mission statement that

'The needs of Luton's people will be first in everything we do'.

The aim of this impact assessment process is to:

- Embed Social Justice principles and practice into the Council's decision making process
- Ensure adherence to the Equality Act 2010 and associated Public Sector Duty
- Minimise duplication of initial impact assessments with regards to Environment and Health
- Ensure Officers have access to the necessary specialist support with regards to all of the above

The table on the first page of this form will enable you to make early consideration of the potential impacts of your proposal with regards to individuals, areas, cohesion, inclusion, the environment and health. You will need to review the impact table once you have completed your assessment to ensure that all impacts are clearly highlighted in the final document.

Once you have completed the table the form will guide you to explain your judgements and then, as appropriate, identify in the action plan how you will be able to enhance and maintain any positive, and mitigate any negative, impacts of your proposal in line with the council's mission and values.

This form will also help you to identify if you need further specialist advice or whether a more detailed Environmental or Health Impact Assessment may be required.

For your convenience, please see links to key Corporate and Partnership documents that may help you as you complete this IIA.

Corporate Plan

<http://intranet/SupportServices/Document%20library/Corporate%20plan%2011th%20July%202011.doc>

Equality Charter

<http://intranet/SupportServices/socialjustice/Document%20library/Equality%20charter.pdf>

Social Justice Framework

http://www.luton.gov.uk/Community_and_living/Lists/LutonDocuments/PDF/Social%20Justice/Social%20Justice%20Framework%202012%20-2026.pdf

Family Poverty Strategy

http://www.lutonforum.org/Forum/Documents/Family-Poverty-Strategy-Final-October2011_001.pdf

Joint Strategic Needs Assessment (JSNA)

http://www.luton.gov.uk/Council_government_and_democracy/Lists/LutonDocuments/PDF/Consultation/Reports/Final%20JSNA%202011.pdf

Community Involvement Strategy

<http://www.lutonforum.org/Forum/Documents/CISfinaljune2010.pdf>

Proposal Title: **IIA on Assisted Transfer Scheme**

Lead Officer Name: **Juliet James-Lionel**

Date of IIA: 12th **March 2013**

Seen By:

SJU (Name/Date) Sandra Legate 8th March 2013

Signed Off By: Cllr Hazel Simmons 12.3.2013 14:17hrs, Cllr Tom Shaw 12.3.2013 13:40hrs

Bundle Lead/Head of Service

(Name/Date Mo Harkin 12th March 2013

Please provide an outline description of your proposal:

It needs to be initially emphasised that the Assisted Transfer Scheme mitigates the negative outcomes already highlight in Luton Borough Council's Integrated Impact Assessment on Welfare Reform.

To support the impact interpretation a profile of existing housing tenants is include:

LBC Tenant Profile

Age (March 2012)

	Age (March 2012)
18-24 yrs	3%
25-49 yrs	46%
50-64 yrs	24%
65+ yrs	27%

Sample 7484 tenants

Source: Annual Report to Tenants 2011/12

Ethnicity (March 2012)

	Ethnicity 31st March 2012	
Arab	14	0.3%
Asian or Asian British		
Bangladeshi	275	5.0%
Asian or Asian British Indian	74	1.3%
Asian or Asian British Other	25	0.5%
Asian or Asian British Pakistani	258	4.7%
Black or Black British African	214	3.9%
Black or Black British Caribbean	428	7.8%
Black or Black British Other	27	0.5%
Bulgarian	1	0.0%
Chinese	7	0.1%
Cypriot	9	0.2%
Czech	1	0.0%
Gypsy or Irish Traveller	6	0.1%
Hungarian	13	0.2%
Italian	11	0.2%
Kashmiri	50	0.9%
Lithuanian	7	0.1%
Maltese	1	0.0%
Mixed other	9	0.2%
Mixed White and Asian	17	0.3%
Mixed White and Black African	28	0.5%
Mixed White and Black Caribbean	88	1.6%
Other	91	1.7%
Polish	54	1.0%
Portuguese	8	0.1%
Slovakian	1	0.0%
White British	3472	63.0%
White Irish	292	5.3%
White Other	28	0.5%
Total	5509	100.0%

Source: Freedom of Information request Jan 2013

Disability (August 2012)

Considered themselves to have a disability	438 (45%)	
Of which:		
Hearing Impaired	103 (20%)	
Mental Health	75 (14%)	
Visually impaired/blind	45 (9%)	
Learning	23 (4%)	
Physical	308 (59%)	
Other	33 (6%)	

Sample 976 tenants

Source: Governance Review Consultation 2012

Gender (March 2013)

Male	3132 (39%)
Female	4863 (61%)

Source: Open Housing Database

The revised Assisted Transfer Scheme seeks to facilitate moves for tenants of Luton BC who are:

- in receipt of means tested benefits whose accommodation is deemed to be too large under the terms of the Welfare Reform Act and whose entitlement to Housing Benefit will be reduced in line with the “bedroom tax” arrangements, or
- in receipt of a state pension and under-occupying their current accommodation or,
- occupying accommodation that benefits from major adaptations to meet the need of a disabled occupant where those adaptations are no longer required, or
- require major adaptations to their homes where the need can be more economically met within the social housing stock

Assistance to move will be provided by the Council arranging, and financing, the tenant’s move combined; where the qualifying tenants are moving from adapted properties or require adaptations to their current homes, with a monetary incentive.

This proposal is largely designed to reduce/mitigate the effects of the under occupation -“bedroom tax” - provisions contained within the Welfare Reform Act which will increase the housing costs for

approximately 780 Luton Borough Council tenants. These tenants are dependent on means tested Welfare Benefits and one of the impacts of this piece of legislation is an increased risk in rent debt of £0.5m per annum in the first year following the implementation of the Act.

Based on average rents for Council properties affected households with one spare bedroom would be expected to pay an average of £12.32 per week towards their rent from their existing income. For affected tenants with two or more spare bedrooms, this figure would increase to approximately £22.50 per week.

Under occupying tenants currently residing in Sheltered Accommodation are not affected by this provision including where they are below pension credit age.

Please include the names of all other contributors and stakeholders involved in the preparing of this proposal who have been consulted and agreed this assessment:

**Sandra Legate – Equality and Diversity
Quality Manager, Social Justice Unit,
LBC**

**Chimeme Egbutah – Health and
Wellbeing Coordinator, Public Health,
LBC**

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:

N/A

IMPACT TABLE

The purpose of this table is to consider the potential impact of your proposal against the Equality Act 2010 'protected characteristics' and other key priorities of Community Cohesion, Social Inclusion, Health and Environment. We also ask you to consider potential outcomes against the key priorities of our Corporate Plan (see link).

Once you have completed this process you should have a clearer picture of any potential significant impacts*, **positive**, **negative** or **neutral**, on People or Places 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.

("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).

In relation to the protected characteristics below, will the proposal have an impact in relation to the outcomes below?

Please fill out this table as much as you can initially. Once you have completed the rest of the form, come back and complete as appropriate	Impact Identified	Outcomes Having identified the impact will it contribute to any of the following Council priorities below?			
		Empower, support & protect the vulnerable (Equality)	Improve life & learning opportunities for all (Inclusion)	Improve health & reduce health inequalities (Health)	
PEOPLE	delete as applicable from the selection below <input checked="" type="checkbox"/> = Positive <input checked="" type="checkbox"/> = Negative <input type="checkbox"/> = Neutral				
Race	<input checked="" type="checkbox"/>	Yes	N/A	Yes	No
Gender	<input checked="" type="checkbox"/>	Yes	N/A	Yes	
Disability	<input checked="" type="checkbox"/>	Yes	N/A	Yes	
Sexual Orientation	<input type="checkbox"/>	N/A	N/A		N/A
Age	<input checked="" type="checkbox"/>	Yes	N/A	Yes	
Religion/Belief	<input type="checkbox"/>	N/A	N/A		N/A
Gender Reassignment	<input type="checkbox"/>	N/A	N/A		N/A
Pregnancy/Maternity	<input checked="" type="checkbox"/>	Yes	Yes	No	N/A
Marriage/Civil Partnership (HR issues only)	<input checked="" type="checkbox"/> <input checked="" type="checkbox"/> <input type="checkbox"/>	N/A	N/A	N/A	N/A
Care Responsibilities ¹ (HR issues only)	<input checked="" type="checkbox"/> <input checked="" type="checkbox"/> <input type="checkbox"/>	N/A	N/A	N/A	N/A
PLACE					
Strengthen community cohesion	<input type="checkbox"/>	Yes	N/A		N/A
Tackling poverty/ promoting social inclusion	<input checked="" type="checkbox"/>	Yes	N/A	Yes	
Area/Wards affected All Wards	<input checked="" type="checkbox"/>	Yes	N/A	Yes	
ENVIRONMENT					

¹ This is a Luton specific priority added to the 9 protected characteristics covered under the Equality Act and takes into account discrimination by association.

Protect and enhance the quality of the natural and built environment	<input type="checkbox"/>	N/A	N/A	N/A
HEALTH				
Promoting health and wellbeing	<input checked="" type="checkbox"/>	Yes	N/A	Yes

Please answer the following questions to help you identify any actions you may need to take with regards to impacts of this proposal

1. 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.

If you would like to know of any potentially relevant research already carried out, please click on the following link below to ***LBC Consultation Portal***

For other local statistics and information, click on the following below link for ***Luton Observatory***

Guidance Notes:

If no use has been made of research, please contact the Consultation and Engagement Team
At Communitycon@luton.gov.uk and/or the Research & Intelligence Team at
research.intelligence@luton.gov.uk

[Click here for LBC Consultation Portal](#)

[Click here Luton Observatory](#)

**Insert any links to reference websites below.
One per space only**

**Insert any relevant files in the spaces below.
One per space only**

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

Work has been undertaken to identify existing Luton BC tenants who will be adversely affected by the “bedroom tax” provisions of the Welfare Reform Act. In the preparation of this document, this has been compared to data relating to existing tenants who have applied to downsize to a smaller home and the profile data held on all Council tenants.



1.2 Have you carried out any specific consultation with people likely to be affected by the proposal? (if yes, please insert details, links to documents as appropriate).

Guidance Notes: If no, please explain why this has not been done - you may wish to speak to the Consultation Team first as a lack of sufficient consultation could render this IIA invalid and place the Council at risk of Judicial Review.

Consultation has been undertaken with the Council's Tenant's Consultative Committee and the Housing Department's Tenancy Management Service Area Panel

[For advice & support from the Social Justice Unit click here](#)

2. Impacts on People

2.1 Where you have identified a **positive*** impact please explain the nature of this impact.

Guidance Notes:

If you identify positive impacts with regards to one or more groups listed above please outline how these can be enhanced and maintained against each group identified. Specific actions to be detailed in action plan below.

**By positive impact we mean, is there likely to be a noticeable improvement experienced by people sharing a characteristic?*

The proposals contained within the Assisted Transfer Scheme would predominantly benefit tenants adversely affected by the "bedroom tax" rules by financing removal costs. These tenants would be under-occupying their homes and in receipt of means tested welfare benefits.

At present 60% of tenants applying to move to a smaller home are households consisting of either a single female, or a single female with children.

The assistance offered by this proposal would therefore be deemed to positively impact upon this group.

(22% of applications consist of a single male head of household and 17% of households are headed

by a mixed sex couple).

Although the terms of the Welfare Reform Act are considered to disproportionately adversely affect disabled occupants of adapted properties, this proposed scheme seeks to positively impact upon this group by funding moves and offering financial incentives to:

- tenants who are able to release adapted properties for use by disabled applicants awaiting re-housing
- existing disabled tenants to facilitate move to properties that will meet their long term housing needs.

Whilst tenants who are pregnant (“maternity”) are less likely to be represented within this proposal’s qualifying groups, its provisions will serve to increase the availability of family sized accommodation for allocations to households with children.

The proposed scheme seeks to support under-occupying tenants in moving home where there is a financial imperative to do so because of the terms of the “bedroom tax” arrangements contained within the Welfare Reform Act. This client group is predominately aged from 40 years to pre-pension credit.

Under-occupying tenants in receipt of a State Pension (who are presently not affected by the “bedroom tax” rules) would also qualify for assistance and support under the terms of the scheme.

Tenants aged 18-39 will be underrepresented in the groups directly benefitting from the scheme but, as with pregnant tenants, they are also likely to benefit from the resulting increased availability of family sized accommodation.

77% of under occupying tenants who are registered for a move to a smaller home classify themselves as White British or Irish. However, this is, in the main, commensurate with the ethnic make up of tenants of the Authority and, as such, the impacts of this scheme would be deemed to be positive in terms of ethnicity.

2.2 Where you have identified a **negative*** impact please explain the nature of this impact.

Guidance Notes:

Please use this box to explain why you feel the proposal may be negative and 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.

**By negative impact we mean is there likely to be a noticeable detrimental effect on people sharing a characteristic?*

If you can identify no mitigation with regards to negative impacts on one or more of the protected groups you must contact the Social Justice Unit – Click the email link box above.

Tenants in same sex relationships will be under-represented amongst tenants benefitting from the terms of this scheme as, in most scenarios, under-occupation occurs when children move away from the family home and this group would be statistically less likely to have households that include children

2.3 Where you have identified a **neutral*** impact for any group, please explain why you have made this judgement.

Guidance Notes:

You need to be confident that you have provided a sufficient explanation to justify this judgement.

**By neutral impact we mean that there will be no noticeable impact on people sharing a characteristic*

Although the terms of the proposed scheme have no explicit reference to religion, there is likely to be a neutral outcome in relation to religion and faith based on LBC statistics.

[For advice & support from the Social Justice Unit click here](#)

3. Impacts on Cohesion

If you have identified an impact on community cohesion, please describe here what this may be and who or where you believe could be affected.

Guidance Notes:

By 'impact on community cohesion' we mean - is the proposal likely to have a noticeable effect on relations within and between specific section(s) of the community, neighbourhoods or areas.

You will need to consider here actions to enhance and maintain positive impacts and how to mitigate negative impacts.

Specific actions to be detailed in action plan below.

If you can identify no mitigation with regards to negative impacts on community cohesion you must contact the Social Justice Unit – Click email link box above

Tenants who feel obliged to move because they are adversely affected by the “bedroom tax” rules will have their options restricted by available housing stock. It is therefore likely that some residents will need to move away from existing support networks to enable them to secure alternative accommodation of a size considered to be suitable for their needs where the rental charge would be fully met by Housing Benefit payments.

Mitigation is difficult in these circumstances but we are limiting the impact through the offer to secure alternate accommodation through our Choice Based Lettings Transfer Scheme and the Bedfordshire Mutual Exchange Scheme.

[For advice & support from the Social Justice Unit click here](#)

4. Impacts on Poverty & Inclusion

If you have identified an impact on tackling poverty/promoting social inclusion, please describe here what you believe this would be and who you believe would be affected.

Guidance Notes:

By poverty and inclusion we mean - 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.

You need to consider here actions to enhance and maintain positive impacts or mitigate negative impacts.

Specific actions to be detailed in action plan below

If you can identify no mitigation to negative impacts on tackling poverty or promoting social inclusion you must contact the Social Justice Unit for advice - Click email link box above

The provisions contained within this proposal have been formulated to alleviate poverty and the threat of increased rental debt for under-occupying tenants who will have their entitlement to Housing Benefit restricted by the “bedroom tax” rules contained within the Welfare Reform Act.

Tenants taking advantage of the provisions of this proposal to facilitate moves to smaller homes will also benefit from decreased running costs of their accommodation (in terms of costs to heat the property, Council Tax liability etc)

By facilitating moves for qualifying tenants the risk of the Council taking possession proceedings

for non-payment of rent against society's poorest members is reduced.

5. Health & Wellbeing

If you have identified an impact with regards to promoting Health and Wellbeing please consider the questions below in more detail.

5.1 Please describe what this impact is and who may be specifically affected by the proposal.

Guidance Notes:

By impact on health and wellbeing we mean - is there the potential for a positive or negative impact on the physical, mental or social well-being of an individual / group. You need to consider here actions to enhance and maintain positive impacts or mitigate negative impacts.

Specific actions to be detailed in action plan below

If you are unable to identify mitigation to questions 5.1 and 5.2 then you must contact the Public Health Team for advice. - Click email link box above

Advice received from the Council's Health Improvement Specialist has indicated a concern that the mental health and wellbeing of older affected tenants may be negatively impacted by the possible social isolation resulting in them moving away from existing support networks.

However, this would be considered to be a negative affect of the "bedroom tax" rules, rather than the provisions contained within this proposal which seeks to provide financial and, where necessary, practical support for tenants who need to move for financial reasons.

Conversely, it is felt that some older people moving to flats from houses/maisonettes may experience physical health improvements due to being able to get around their homes.

5.2 Will the proposal impact positively or negatively on access to, and /or quality of, health and wellbeing services?

Guidance Notes:

By Health and Wellbeing services we mean clinical services as well as, for example, health improvement services such as Stop Smoking, weight management, alcohol and drug services, exercise programmes, affordable warmth, falls prevention etc.

You need to consider here actions to enhance and maintain positive impacts or mitigate negative impacts

Specific actions to be detailed in action plan below.

If you are unable to identify mitigation to questions 5.1 and 5.2 then you must contact the Public Health

Team for advice. - Click email link box above

There is considered to be a neutral impact in this respect

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

6. Impacts on the natural & built environment

If you have identified an impact on the natural and built environment please consider the questions below.

Are there aspects of this proposal that may:

- a) help in reduction of greenhouse gas emissions, produced by the burning of fossil fuels (i.e. coal, oil), which is likely to add to the effects of climate change
- b) have an effect on conservation of energy, water, minerals and materials
- c) have an impact on the amount of waste that could be generated through the implementation of the proposal
- d) impact positively or negatively on access to and the quality of the natural environment (eg parks, play areas, green spaces, conservation areas)
- e) improve people's or infrastructure's resilience towards extreme weather conditions
- f) affect amount of car journeys to/from a particular site

There is deemed to be a neutral impact in terms of a)-f) above

Guidance Notes:

If you identify positive impacts with regards to questions please outline how these can be enhanced and maintained. If you identify negative impacts in response to questions then you will need to explain any actions that you intend to take to mitigate these impacts.

Specific actions to be detailed in action plan below

If you are unable to identify mitigation with regards to questions 6.a-f then you must contact the Strategy and Sustainability Team at myclimate@luton.gov.uk as a more detailed specialist consideration of this proposal will be necessary. Click email link box above

a)

b)

c)

d)

e)
f)

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:

Summary of Findings and Actions (for publication and to be written by the author)

Next Steps

- All Executive Reports must have an IIA attached (where relevant)
- All report authors must complete the IIA section of Executive Reports (equalities, cohesion, inclusion, health, environment)
- All reports are to be forwarded to the Social Justice Unit, Public Health and Strategy & Sustainability Unit for sign off in time for Executive deadline
- Social Justice Unit, Public Health and Strategy & Sustainability Unit to highlight key points of concern from IIA in their sign off comments
- 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