

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: Arrangement Fees Date of IIA: 3 rd December 2012	Lead Officer Name: Clive Jones
Seen By: Maureen Drummond, Social Justice Adviser, 13 December 2012 SJU (Name/Date)	
Signed Off By: Sue Nelson Bundle Lead/Head of Service (Name/Date)	
<p>Please provide an outline description of your proposal:</p> <p>Fees for direct debit failures and arrangements post summons were introduced to cover the administration costs last year.</p> <p>The proposal is to charge for all arrangements made except for those who are financially vulnerable. Those not working are already protected as they are not liable for Council Tax. This change is designed to help low income working families. From the consultation that occurred this autumn on the Council Tax Support Scheme, analysis of the feedback received highlighted that it is those working families that are on low incomes that need the most support as they are liable for payment of some Council Tax and are suffering increasing household costs.</p>	
Please list other contributors and stakeholders involved in the preparing of this assessment:	If there is any potential impact on staffing you must invite trade union involvement in the preparation of this assessment:
Clive Jones Sandra Legate	None

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 = Positive x = Negative o = Neutral						
Race	<input type="checkbox"/>	Yes No N/A	Yes No N/A	Yes No N/A			
Gender	<input type="checkbox"/>	Yes No N/A	Yes No N/A	Yes No N/A			
Disability	<input type="checkbox"/>	Yes No N/A	Yes No N/A	Yes No N/A			
Sexual Orientation	<input type="checkbox"/>	Yes No N/A	Yes No N/A	Yes No N/A			
Age	<input type="checkbox"/>	Yes No N/A	Yes No N/A	Yes No N/A			
Religion/Belief	<input type="checkbox"/>	Yes No N/A	Yes No N/A	Yes No N/A			
Gender Reassignment	<input type="checkbox"/>	Yes No N/A	Yes No N/A	Yes No N/A			
Pregnancy/Maternity	<input type="checkbox"/>	Yes No N/A	Yes No N/A	Yes No N/A			
Marriage/Civil Partnership (HR issues only)	<input type="checkbox"/>	Yes No N/A	Yes No N/A	Yes No N/A			

Care Responsibilities ¹ (HR issues only)	✘	Yes	No N/A	Yes	No N/A	Yes	No N/A
PLACE							
Strengthen community cohesion	✘	Yes	No N/A	Yes	No N/A	Yes	No N/A
Tackling poverty/ promoting social inclusion	✘	Yes			N/A		N/A
Area/Wards affected All Wards	✘	Yes			N/A		N/A
ENVIRONMENT							
Protect and enhance the quality of the natural and built environment	✘	Yes	No N/A	Yes	No N/A	Yes	No N/A
HEALTH							
Promoting health and wellbeing		Yes	No N/A	Yes	No N/A	Yes	No N/A

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**

None

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

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.

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

The change proposed will protect the financially vulnerable for the first time. This is a minor change to existing charging policy and will not impact on any vulnerable residents in a negative manner.

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.

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 means testing of customers to see if they are on Council Tax Benefit or Local Council Tax Support who ask for an arrangement will exempt all financially vulnerable people from charges. This clear guidance on protection will ensure residents with lower incomes continue to approach the Council for help.

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.

The Council is having to look at all areas of service provision, particularly those deemed as discretionary rather than mandatory, staffing levels across the whole Council and whether the

Council is the best person to provide the services direct. Since 2010 the Council has saved £32M and it is envisaged that by 2016 the Council would have had to cut £80M from its budgets due to cutting of revenue from Central Government and changes made by Central Government on the Councils ability to collect local taxes. This latest change to local taxation must also be seen in the wider longer term cuts to local government funding since 2010 which is an accumulative impact on the ability of the Council to provide local services. The additional charges for arrangement fees will help mitigate the funding reduction.

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*

Not Applicable.

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

None identified.

[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

As per previous IIAs undertaken to look at national led austerity measures i.e. Welfare Reform and Council Tax Benefit Changes the following impacts would be similar in relation loss of grant to the Council and the ability to support social outcomes for citizens.

Therefore any further loss to income to the Council seriously affects the way it can not only support the most vulnerable but also continue to ensure continued social inclusion of these groups.

In relation to the arrangement fees it is important to increase income where possible to ensure as much income is available to the council to spend. The proposed changes will bring in much need revenue to mitigate some of the impact of these centrally issued cuts.

[For advice and support from Public Health click here](#)

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

As per impact on poverty and inclusion. Officers and councillors are able to see the health impact assessment on welfare reform which supports this conclusion that the overall package will negatively impact health.

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

As per impact on poverty and inclusion.

[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

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) None identified

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
Collection of Arrangement fees	February 2013	Clive Jones	Protect financially vulnerable while increasing income	March 2013

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

Key Contacts:

Clive Jones Income Manger

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