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Budget Proposals 2013/14: Minor Decision: Business Unit: Community Safety

Community Protection

Combined Impact Assessment: Full assessment (Part 2)

The council and its partners are facing a significant challenge in the savings it needs to make over the next couple of years. This Full Impact Assessment has been developed as a tool to enable business units to fully consider the impact of proposed major decisions on the community. As a council we need to ensure that we are able to deliver the savings that we need to make from the 1st April and be able to justify our decisions through any legal challenge.

This full assessment, combined with the initial review, will evidence that you have fully considered the impact of your proposed changes and carried out appropriate consultation on those changes with the key stakeholders. The Combined Impact Assessment will allow Councillors to make informed decisions as part of the decision-making process regarding the council's budget.

Name: Fran Hughes **Position:** Executive Head Community Safety
Business Unit: Community Safety **Department:** Community Safety – Community Protection
Date Commenced: November 2012 **Date:** January 2013 v4

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Summary from Overall Proposal (Updated as required)

Proposal – Outline	Savings 2013/14		Implementation Cost Include brief outline + year incurred	Delivery In place 01/04/13 If earlier or later state date	Risks / impact of proposals <ul style="list-style-type: none"> Potential risks Impact on community Knock on impact to other agencies 	Type of decision*		
	Income £ 000's	Budget reduction £ 000's				Internal	Minor	Major
Reduce the number of investigation and enforcement staff within the Community Protection Team. This will result in a 50% reduction in the proactive contaminated land and air quality work undertaken; a further prioritisation of complaints received based on risk and vulnerability and a move towards allocating resources on the basis of threat, risk and harm. Some customers will therefore not receive a bespoke service to investigate their complaints.		47020	Redundancy payments at 31/03/2013	01/04/2013	<ul style="list-style-type: none"> 20% of customers will not receive a bespoke service as they do not meet the risk and vulnerability threshold; The data from those 20% will be used as intelligence to monitor trends in activity and allocate resources; 50% reduction in the scientific work associated with air quality and contaminated land duties Low risk issues and complaints will not be dealt with. 		X	

Section 1: Purpose of the proposal/strategy/decision

No	Question	Details
1.	Clearly set out the purpose of the proposal	<p><i>Outline exactly what the proposal is / whether there is any change including reasons for the change. List the key objectives of the proposal/strategy.</i></p> <p>To reduce the demand for community protection services, i.e. complaints relating to pollution, noise, etc.</p> <p>The aim is to focus the work of the team on the highest areas of threat, risk and harm. In order to do this, we will apply a filter to all complaints at the first point of contact which assesses the risk and vulnerability of the client. Those who meet the new thresholds will receive a bespoke service as currently. For those who do not meet the thresholds they will be offered advice and other sources of support, e.g. website, mediation, etc. We will not commence a bespoke investigation but will use the information as part of our intelligence gathering. These intelligence processes will look for trends in activities and risks and be used to allocate resources when they become available. The aim is to reduce demand in this area by 20%.</p> <p>We will be developing the thresholds over the coming months.</p>
2.	Who is intended to benefit / who will be affected?	<p><i>Who are the key stakeholders / which individuals / specific groups may benefit from the proposal or who will be most affected?</i></p> <p>Those members of the public who are vulnerable or who have a high risk issue affecting their wellbeing will continue to receive a service when they contact us as is the current arrangement.</p> <p>Those members of the public who are assessed as not being vulnerable or who are not experiencing a significant risk to their wellbeing will not receive a bespoke investigation and will be signposted to other sources of assistance.</p> <p>The wider population of Torbay will be affected by the changes to reduce the scientific work we proactively undertake. We will only deliver the statutory minimum service in these areas.</p>

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No	Question	Details
3.	What is the intended outcome?	<p><i>It is important to identify the specific outcomes that this proposal intends to deliver.</i></p> <p>The intended outcome is to manage demand to Community Protection and ensure that finite resources are targeted at the areas of highest threat, risk and harm.</p> <p>The Council's statutory obligations in this area of work are under the Environmental Protection Act 1990 Section 79 where the legal duty states:</p> <p style="padding-left: 40px;">"it shall be the duty of every local authority to cause its area to be inspected from time to time to detect any statutory nuisances."</p> <p>All other issues, e.g. fly tipping, envirocrime enforcement are powers of the council but are not statutory duties of the local authority. Hence they will not be investigated unless have been witnessed by member of the public and are prepared to supply witness statements.</p> <p>Not undertaking enforcement or investigatory activities may impact upon TOR2 and the relationship between enforcement and frontline delivery and service costs. For example, if enforcement reduces then there may be additional costs of clear up by TOR2, and a reduced regulatory deterrent may mean that people are more inclined to flytip.</p>

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Section 2: Equalities, Consultation and Engagement

Torbay Council has a moral obligation as well as a duty under the Equality Act 2010 to eliminate discrimination, promote good relations and advance equality of opportunity between people who share a protected characteristic and people who do not.

The **Equalities, Consultation and Engagement** section ensures that, as a council, we take into account the Public Sector Equality Duty at an early stage and provide evidence to ensure that we fully consider the impact of our decisions/proposals on the Torbay community.

Evidence, Consultation and Engagement

No	Question	Details
4.	Have you considered the available evidence?	<p><i>Consider data and research already available locally and nationally. Your assessment should be under-pinned by up-to-date and reliable information about the different groups the proposal is likely to affect. For instance, population profile, satisfaction data, deprivation statistics and how this helps to build a picture around your proposal.</i></p> <p>We already collect data on demand and we aim to reduce demand by 20% based on this new system. We have trailed a similar method of working in private sector housing standards based on an agreed format which the police use for assessing vulnerability, which has demonstrated that this type of assessment can be practically implemented. to</p>
5.	How have you consulted on the proposal?	<p><i>Have you carried out any consultation on your proposal and if so how? Focus groups / survey / events? Remember that it may be important to also consult on any alternative options. Also include who you have consulted with and if applicable which specific groups you have consulted with (i.e. groups who may be specifically affected by your proposal, specific equality or hard to reach groups).</i></p> <p>A public budget questionnaire will be made available on the 2nd January - this will be made available online and at our connections offices & libraries. This questionnaire asks local residents views on this proposal.</p>
6.	Outline the key findings	<p><i>Include feedback on your proposal including where you have consulted on any alternative options. Also include response rates, number of attendees to events / focus groups, outline of specific interest groups consulted. Use bullet points to summarise the key conclusions.</i></p> <p>Results will be made available for the full Council meetings taking place in February</p>

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No	Question	Details
7.	What amendments may be required as a result of the consultation?	<i>Has feedback from the consultation and engagement process identified any changes required to the proposal? Have you had to alter your decision and look at alternative options?</i> Please see above – the results of the public consultation will be used to feed into the budget setting full council meetings in February 2013

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Positive and Negative Equality Impacts

No	Question	Details		
8.	Identify the potential positive and negative impacts on specific groups	<i>It is not enough to state that a proposal will affect everyone equally. There should be more in-depth consideration of available evidence to see if particular groups are more likely to be affected than others – use the table below. You should also consider workforce issues. If you consider there to be no positive or negative impacts use the ‘neutral’ column to explain why.</i>		
		Positive Impact	Negative Impact	Neutral Impact
	All groups in society generally		Low risk issues and complaints will not be dealt with but we will have regard to all the information which we receive and use it to make sure we identify trends and areas which require a more detailed investigation.	Those who are affected by a high risk issue or who are vulnerable will still receive the same level of service as currently. The filter system will be based on risk and the vulnerability of the individual; therefore there should be a neutral impact on most clients.
	Older or younger people		Low risk issues and complaints will not be dealt with but we will have regard to all the information which we receive and use it to make sure we identify trends and areas which require a more detailed investigation.	Those who are affected by a high risk issue or who are vulnerable will still receive the same level of service as currently. The filter system will be based on risk and the vulnerability of the individual; therefore there should be a neutral impact on most clients.
	People with caring responsibilities		Low risk issues and complaints will not be dealt with but we will have regard to all the information which we receive and use it to make sure we identify trends and areas which require a more detailed investigation.	Those who are affected by a high risk issue or who are vulnerable will still receive the same level of service as currently. The filter system will be based on risk and the vulnerability of the individual; therefore there should be a neutral impact on most clients.

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No	Question	Details	
	People with a disability		<p>Low risk issues and complaints will not be dealt with but we will have regard to all the information which we receive and use it to make sure we identify trends and areas which require a more detailed investigation.</p> <p>Those who are affected by a high risk issue or who are vulnerable will still receive the same level of service as currently. The filter system will be based on risk and the vulnerability of the individual; therefore there should be a neutral impact on most clients.</p>
	Women or men		<p>Low risk issues and complaints will not be dealt with but we will have regard to all the information which we receive and use it to make sure we identify trends and areas which require a more detailed investigation.</p> <p>Those who are affected by a high risk issue or who are vulnerable will still receive the same level of service as currently. The filter system will be based on risk and the vulnerability of the individual; therefore there should be a neutral impact on most clients.</p>
	People who are black or from a minority ethnic background (BME)		<p>Low risk issues and complaints will not be dealt with but we will have regard to all the information which we receive and use it to make sure we identify trends and areas which require a more detailed investigation.</p> <p>Those who are affected by a high risk issue or who are vulnerable will still receive the same level of service as currently. The filter system will be based on risk and the vulnerability of the individual; therefore there should be a neutral impact on most clients.</p>
	Religion and Belief		<p>Low risk issues and complaints will not be dealt with but we will have regard to all the information which we receive and use it to make sure we identify trends and areas which require a more detailed</p> <p>Those who are affected by a high risk issue or who are vulnerable will still receive the same level of service as currently. The filter system will be based on risk and the vulnerability of the individual; therefore there should</p>

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No	Question	Details	
		investigation.	be a neutral impact on most clients.
	People who are lesbian, gay or bisexual	Low risk issues and complaints will not be dealt with but we will have regard to all the information which we receive and use it to make sure we identify trends and areas which require a more detailed investigation.	Those who are affected by a high risk issue or who are vulnerable will still receive the same level of service as currently. The filter system will be based on risk and the vulnerability of the individual; therefore there should be a neutral impact on most clients.
	People who are transgendered	Low risk issues and complaints will not be dealt with but we will have regard to all the information which we receive and use it to make sure we identify trends and areas which require a more detailed investigation.	The filter system will be based on risk and the vulnerability of the individual; therefore there should be a neutral impact on most clients.
	People who are in a marriage or civil partnership	Low risk issues and complaints will not be dealt with but we will have regard to all the information which we receive and use it to make sure we identify trends and areas which require a more detailed investigation.	Those who are affected by a high risk issue or who are vulnerable will still receive the same level of service as currently. The filter system will be based on risk and the vulnerability of the individual; therefore there should be a neutral impact on most clients.
	Women who are pregnant / on maternity leave	Low risk issues and complaints will not be dealt with but we will have regard to all the information which we receive and use it to make sure we identify trends and areas which	Those who are affected by a high risk issue or who are vulnerable will still receive the same level of service as currently. The filter system will be based on risk and the vulnerability of

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No	Question	Details	
			<p>require a more detailed investigation.</p> <p>the individual; therefore there should be a neutral impact on most clients.</p>
9.	<p>Is there scope for your proposal to eliminate discrimination, promote equality of opportunity and/or foster good relations?</p>	<p><i>The council is committed to ensuring that we meet the diverse needs of our community. As part of the Equality Act there is a <u>general duty as well as our moral obligation</u> where we are required to have 'due regard' to eliminating unlawful discrimination, advancing equality of opportunity and foster good relations between people who share a protected characteristic and people who do not. Outline how your proposal meets the general duty.</i></p> <p>In the development of this proposal, we have tried to balance the reality of a significant cut in Central Government funding to protect the most vulnerable members of our community as far as possible.</p> <p>By virtue of the fact that we will prioritise cases which are high risk or where the client is vulnerable, we will ensure that those who need the service most will receive it. All other clients will be able to report their concerns and we will monitor this information and ensure it is turned into intelligence to enable the Business Unit to deploy its limited resources to best effect.</p>	

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Section 3: Steps required to manage the potential impacts identified

No	Action	Details
10.	Summarise any positive impacts and how they will be realised most effectively?	<p><i>Outline any positive impacts that you have identified relating to equalities and how these impacts will be realised most effectively. What ways can the positive impacts be maximised? Use the action plan on page 6 to outline actions, responsible officers and timescales</i></p> <p>Vulnerable clients and those with high threat, risk and harm receive a priority service.</p>
11.	Summarise any negative impacts and how these will be managed?	<p><i>Outline any negative impacts that you have identified relating to equalities and how these impacts will be managed / monitored so that they are reduced / eliminated or mitigated. What ways can the negative impact be minimised? Use the action plan on page 6 to outline actions, responsible officers and timescales.</i></p> <p>In the development of this proposal, we have tried to balance the reality of a significant cut in Central Government funding to protect the most vulnerable members of our community as far as possible. The proposal recognises the need for additional support based on threat, risk and harm and the vulnerability of the client involved. We are aware of high profile cases, such as the Pilkington SCR, and the assessment matrix will take this into account. The vulnerability matrix is based on best practice and is already in use by the police</p>

Section 4: Course of Action

No	Action	Details
12.	<p>State a course of action</p> <p>[please refer to action plan on page 9]</p>	<p><i>Clearly identify an option and justify reasons for this decision. The following four outcomes are possible from an assessment (and more than one may apply to a single proposal). Please select from the 4 outcomes below and justify reasons for your decision - If '3' please provide full justification :</i></p> <p>Where: -</p> <p>Outcome 1: No major change required - EIA has not identified any potential for adverse impact in relation to equalities and all opportunities to promote equality have been taken.</p> <p>The matrix which assesses risk and vulnerability will be kept under review and cross referenced with the</p>

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		intelligence received to ensure that those who need services continue to receive them. The impact on TOR2 will also be monitored through regular dialogue as part of existing arrangements.
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Section 5: Monitoring and Action Plan

No	Action	Details
13.	Outline plans to monitor the actual impact of your proposals	<p><i>The full impact of decisions will only be known once it is introduced. Identify arrangements for reviewing the actual impact of proposals once they have been implemented. Please also use the action plan below.</i></p> <p>The new intelligence based model will act as a check and balance on the effectiveness of the assessment matrix.</p>

Please use the action plan below to summarise all of the key actions, responsible officers and timescales as a result of this impact assessment

Action plan

Please detail below any actions you need to take: -

No.	Action	Reason for action / contingency	Resources	Responsibility	Deadline date
1	Consult members of the public in Torbay as part of the budget setting process	Any reduction in service will require public consultation.	Officer Time	Policy and Performance Team/ Community Safety Business Unit	Commence in January 2013 – included as part of the public budget consultation
2	Utilise the new intelligence model to assess the effectiveness of the risk and vulnerability matrix.	To ensure that the threshold is set at an appropriate level.	Officer time	Community Safety Business Unit	Quarterly
3	Meet regularly with TOR2 to assess	To ensure that there are no	Officer time	Community	Quarterly as part

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	the impact of the changes and ensure that there are no unintended consequences	unintended consequences from the council's actions		Safety Business Unit	of existing contract monitoring arrangements.
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