

## Integrated Impact Assessment (IIA)

The Integrated Impact Assessment (IIA) has been designed to help support the Council in making informed and effective decisions whilst ensuring compliance with a range of statutory legislation, such as the Equality Act 2010. It consists of 7 main sections as outlined below:

- Section 1 - Equality Act 2010 (Statutory Duties) (Wales) Regulations 2011
- Section 2 - Welsh Language (Wales) Measure 2011 and Welsh Language Standards
- Section 3 - Socio-economic Duty
- Section 4 - Children’s Rights Approach – The Right Way
- Section 5 - Data
- Section 6 - Consultation
- Section 7 - Decision

Lead Officer	Head of Service	Service Area & Department	Date
Ellie Fry	Clive Rogers Bernadette Elias (Sarah King)		

Briefly outline the proposal indicating what change or decision is to be made, also provide any documentation that may be used to support this. **What is the proposal that needs to be assessed?**

**The Civic Centre was vacated in March 2020 due to the pandemic lockdown arrangements. At this point in time it was on a less than five years’ trajectory to being vacated due to the age and condition of the building. The building was over 50 years old – the expected life-span of a building of that nature is probably 50-60 years depending on condition. An alternative provision of community facing services based in ‘hubs’ was being developed and during the pandemic this was rolled out quickly across the towns in Blaenau Gwent. Following the roll out of the ‘Hubs’ service the Civic Centre was formally closed to be demolished as soon as was practicably possible.**

**Section 1 – Equality Act 2010 (Statutory Duties) (Wales) Regulations 2011**

*Briefly outline below if there will be any positive or negative impacts, on any groups of people with protected characteristics, who are covered by the Equality Act 2010, as a result of the proposal being considered.*

Protected characteristics	Will the proposal have any positive impacts on those with a protected characteristics?	Will the proposal have any negative impacts on those with a protected characteristics?	Outline how the proposal could maximise any positive impacts or minimise any negative impact. Please indicate any views evidence you have that supports this.
<p><b>Age</b> <i>(people of all ages)</i></p>	<p>All Ages</p>	<p>Negative (Civic closure) Positive (Hub openings)</p>	<p>By moving the services offered from the Civic Centre into individual towns the services moved closer to those individuals who would have had difficulty travelling to the Civic Centre. More buses go to town centres then to outskirts of towns.</p>
<p><b>Disability</b> <i>(people with disabilities/ long term conditions)</i></p>	<p>Yes</p>	<p>Negative (Civic closure) Positive (Hub openings) Negative – parking near to a Community hub may be restricted due to the library locations Positive – more buses go to/through town centres, although are infrequent</p>	<p>By moving the services offered from the Civic Centre into individual towns the services moved closer to those individuals who would have had difficulty travelling to the Civic Centre. Also, each venue has toilets and full wheelchair access to the hub office if/when required.</p>

<b>Gender Reassignment</b> <i>(anybody who's gender identity or gender expression is different to the sex they were assigned at birth)</i>	N/A		
<b>Protected characteristics</b>	<b>Will the proposal have any positive impacts on those with a protected characteristic?</b>	<b>Will the proposal have any negative impacts on those with a protected characteristics?</b>	<b>Outline how the proposal could maximise any positive impacts or minimise any negative impact. Please indicate any views evidence you have that supports this.</b>
<b>Marriage or Civil Partnership</b> <i>(people who are married or in a civil partnership)</i>	N/A	N/A	N/A
<b>Pregnancy and Maternity</b> <i>(women who are pregnant and/or on maternity leave)</i>	Yes	Negative (Civic closure) Positive (Hub openings) Positive (locality/accessibility) Negative (parking near to a Community hub may be restricted due to the library locations)	By moving the services offered from the Civic Centre into individual areas, the services have moved closer to those individuals who may have found travelling to the Civic Centre more challenging. They are based in towns which means that multiple tasks can be achieved e.g. shopping, Hub visit, library, benefits in one trip.

		Positive – more buses go to/through town centres although are infrequent	
<b>Race</b> <i>(people from black, Asian and minority ethnic communities and different racial backgrounds)</i>	N/A	N/A	N/A
<b>Religion or Belief</b> <i>(people with different religions and beliefs including people with no beliefs)</i>	N/A	N/A	N/A
<b>Protected characteristics</b>	<b>Will the proposal have any positive impacts on those with a protected characteristics?</b>	<b>Will the proposal have any negative impacts on those with a protected characteristics?</b>	<b>Outline how the proposal could maximise any positive impacts or minimise any negative impact. Please indicate any views evidence you have that supports this.</b>
<b>Sex</b> <i>(women and men, girls and boys and those who self-identify their gender)</i>	N/A	N/A	N/A

<b>Sexual Orientation</b> <i>(lesbian, gay, bisexual, heterosexual, other)</i>	N/A	N/A	N/A
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## Section 2 - Welsh Language (Wales) Measure 2011 and Welsh Language Standards

The Welsh Language Measure 2011 and the [Welsh Language Standards](#) require the Council to have 'due regard' for any positive or negative impacts that proposal may have on opportunities to use the Welsh language.

Requirements	Does the proposal have any positive, negative, or neutral impacts with regards to the below?	What can be done to mitigate any negative impacts?	Please demonstrate any evidence used to form this opinion.
<p><b>Compliance with the Welsh Language Standards.</b> <i>For example, Standards 88 - 93 – policy development and review of existing policies)</i></p>	<p>Neutral impact as same application of WLS as in Civic Centre</p>	<p>No negative impacts in this area as far as compliance.</p>	<p>Our Community Hubs will offer the same Welsh language services as the former arrangements in the Civic Centre.</p>
<p><b>What opportunities are there to promote the Welsh Language?</b> <i>For example, status, use of Welsh language services, use of Welsh in everyday life in work / community</i></p>	<p>Neutral impact as same situation as in Civic Centre</p>	<p>No negative impacts in this area as far as compliance is concerned.</p>	<p>Any posters/leaflets displayed in the Community Hubs are bilingual. Promotion of and information displayed on the Community Hubs is shown in both Welsh and English languages</p>
<p><b>What opportunities are there for a person to use the Welsh Language?</b></p>	<p>Neutral impact. Community Hub officers will offer the same Welsh language service as in</p>	<p>(Negative) We need to inform residents if there is no</p>	<p>Any posters/leaflets displayed in the Community Hubs are bilingual. Promotion</p>

<p><i>For example, staff, residents and visitors</i></p>	<p>the Civic Centre where required.</p>	<p>immediate Welsh language service available        (Positive) Community Hub staff will be carrying out basic Welsh language training.</p>	<p>of and information displayed on the Community Hubs is shown in both Welsh and English languages</p>
<p><b>Is the Welsh language being treated no less favourably than the English language?</b></p>	<p>Yes</p>	<p>Some Community Hub staff have a basic understanding of the Welsh language and further training will be carried out.</p>	<p>Any posters/leaflets displayed in the Community Hubs are bilingual. Promotion of and information displayed on the Community Hubs is shown in both Welsh and English languages</p>

### Section 3 - Socio-economic Duty (Strategic Decisions Only – Please refer to our Corporate Reporting Guidance)

Welsh Government’s [Socio-economic Duty](#) provides a framework to ensure tackling inequality of outcome is at the forefront of decision making.

#### Please consider how your proposal could affect the following groups:

- Single parents and vulnerable families
- People with low literacy/numeracy
- Pensioners
- Looked after children
- Homeless people
- Carers
- Armed Forces Community
- Students
- Single adult households
- People who have experienced the asylum system
- People of all ages leaving a care setting
- People living in the most deprived areas in Wales (WIMD)
- People involved in the criminal justice system
- People misusing substances

Socio Economic Disadvantages	Will the proposal have a positive, negative, or neutral impact?	How could you mitigate the negative impacts outlined?	Please highlight any evidence that has been considered (quantitative or qualitative)
<b>Low Income / Income Poverty</b> <i>(cannot afford to maintain regular payments such as bills, food, clothing, transport etc.)</i>	Positive	Hub officers provide help and support.	Case studies can evidence this e.g. links into Benefits, foodbank and FSM.



<p><b>Low and/or No Wealth</b> (<i>enough money to meet basic living costs and pay bills but have no savings to deal with any unexpected spends and no provisions for the future</i>)</p>	<p>Positive</p>	<p>Hub officers provide help and support.</p>	<p>Case studies can evidence this e.g. Budgetary advice and Debt management support</p>
<p><b>Material Deprivation</b> (<i>unable to access basic goods and services i.e., financial products like life insurance, repair/replace broken electrical goods, are located in warm home, hobbies etc.</i>)</p>	<p>Positive</p>	<p>Hub officers provide help and support.</p>	<p>Case studies can evidence this e.g. applications made to Discretionary Assistance Fund</p>
<p><b>Area Deprivation</b> (<i>where you live (rural areas), where you work (accessibility of public transport) Impact on the environment?</i>)</p>	<p>Positive (Community Hubs located in town centres) Negative (Bus services into town centres not frequent enough)</p>	<p>Community Hubs opening times are advertised widely and on our website.</p>	<p>Footfall is monitored in each Community Hub.</p>
<p><b>Socio-economic Background</b> (<i>social class i.e., parents' education, employment and income</i>)</p>	<p>Neutral</p>	<p>Anyone of any social class can visit a Community Hub as they could the Civic Centre.</p>	<p>N/A</p>
<p><b>Socio-economic Disadvantage</b> (<i>What cumulative impact will the proposal have on people or groups because of their protected characteristic(s) or vulnerability or because they are already disadvantaged</i>)</p>	<p>Positive</p>	<p>Community Hubs present in all town centres makes it easier for people or groups to access support.</p>	<p>The footfall and diversity of queries being presented to the Community Hubs.</p>

#### Section 4 – Children’s Rights Approach - [The Right Way](#)

The Children’s Rights Approach – The Right Way is a framework for working with children, grounded in the UN Convention on the Rights of the Child (UNCRC). It places the UNCRC at the core of planning and service delivery and integrates children’s rights into every aspect of decision-making, policy and practice. The Right Way focuses on three main them Participation, Provision and Protection.

Protected characteristics	Will the proposal have any positive impacts on the Children’s Rights Approach?	Will the proposal have any negative impacts on the Children’s Rights Approach?	Outline how the proposal could maximise any positive impacts or minimise any negative impact. Please indicate any views evidence you have that supports this.
<b>Participation</b> (child or young person as someone who actively contributes to society as a citizen)	N/A		
<b>Provision</b> (the basic rights of children and young people to survive and develop)	N/A		
<b>Protection</b> (children and young people are protected against exploitation, abuse or discrimination)	N/A		

## Section 5 - Data

*Please outline any data or evidence that has been used to develop the proposal. For example, this can be previous consultations, national/regional/local data, pilot projects, reports, feedback from clients etc.*

What data/evidence was used? - provide any links.	What were the key findings?	How has the data/evidence informed this proposal?
<p><b>An Independent Condition Survey was carried out in 2018 by 'Property Data Solutions'. This Survey analyses the buildings condition and advises on what measures are required to return it to an acceptable standard.</b></p>	<p>Backlog Maintenance in the region of £1.5 Million was required in order to return the building to an acceptable standard after which an annual planned maintenance budget would need to be ring fenced in order to maintain the integrity of the investment or the building would fall back into disrepair.</p>	<p>Due to the significant financial investment required for this proposal, the business case for retaining the building is not a viable option for the Council given the ongoing difficult financial situation.</p>

### Are there any data or information gaps and if so what are they and how do you intend to address them?

The original building was erected in 1964 with additional elements added in the mid 1970's. The life span of a building of this time/type is between 30 to 60 years (best case 2024). Maintenance on the building was undertaken as and when budget was available, repaired as and when necessary and remodelled inside, required to improve the office environment. These works would have had no impact on the overall lifespan of the building.

More recently, there was significant concern about the integrity of the existing structure, a steel reinforcement framework that would have been embedded within the concrete construction. This would not have been included within the findings of the Condition Survey undertaken in 2018. Recently a piece of the external concrete fell away from the steel reinforcement.

It would not be prudent to invest a significant sum of money into a building with a limited lifespan, this building had almost achieved its best case lifespan by the time it was vacated as a result of the pandemic in 2020/21.

In addition, the fabric of the building was not energy efficient and would have required a significant financial outlay in addition to the Condition Survey findings to begin to 'decarbonise' the building. Without this additional investment the building would also be extremely expensive to heat due to heat loss and would have been a significant issue for the Welsh Governments objectives to decarbonise the public sector estate by 2050.

Finally, there would have been very limited opportunity to improve the Carbon Footprint for this building - as one of our key Corporate Buildings, and given the evidence above, this was a major concern for the Council moving forward.

## **Section 6 - Consultation.**

*Using the questions below please provide details of any planned consultations or consultations that have been undertaken to support the proposal, referring to the Gunning Principles as appropriate:*

Principle 1: Consultation must take place when the proposals are still at a formative stage. You must not have already made up your mind.

Principle 2: Sufficient reasons must be put forward to allow for intelligent consideration and response. Have people been given the information and opportunity to influence?

Principle 3: Adequate time must be given for consideration and response. Is the consultation long enough bearing in mind the circumstances?

Principle 4: The product of consultation must be conscientiously taken into account when finalising the decision

**Please consider the following questions:**

1. Who did you consult?
2. When did the consultation take place and was adequate time given for a response?
3. Was there enough information provided to respond effectively?
4. What were the findings?
5. Have the findings been considered with regards to the decision?

**Section 7 - Decision**

*Using the information you have gathered from sections 1-9 please state in the table below whether you are able to proceed with the proposal.*

Continue with the proposal in its current form	Yes <input type="checkbox"/>	No <input type="checkbox"/>
Continue with proposal but take into account reasonable steps to mitigate any negative impacts of the proposal	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>

Please contact Policy & Partnerships should you require any further advice or guidance on completing your assessment via [lissa.friel@blaenau-gwent.gov.uk](mailto:lissa.friel@blaenau-gwent.gov.uk) or [emma.scherptong@blaenau-gwent.gov.uk](mailto:emma.scherptong@blaenau-gwent.gov.uk).