

Integrated Impact Assessment

Quick Reference Guide

Why?

Impact assessments are an important practical tool for helping us understand and mitigate the possible impact of our decisions on our residents, customers and services. Impact assessments help us to ensure we have considered how different groups and services could be affected by our proposals, enabling us to strengthen positive aspects and mitigate any potentially negative impacts. Impact assessments ultimately provide an opportunity for us to evidence our thought process and to challenge assumptions in developing new proposals. As a result, impact assessments can help ensure that new proposals are effective and relevant to achieving the Council's vision of enabling all our citizens to "start, live and age well in a healthy, safe and prosperous environment".

What?

The integrated impact assessment is a template to be completed and reviewed as part of the development process of proposals that will be put forward for decision by the Council's Cabinet or Full Council.

The Council has a statutory requirement to complete impact assessments under a number of legislative requirements. These requirements are legal obligations for the Council and failure to meet these duties may result in the Council being exposed to legal challenge for not following due process.

This integrated assessment incorporates the requirements of the following Acts into one Impact Assessment:

- Well-being of Future Generations (Wales) Act 2015
- Public Sector Equality Duty and the Equality Act 2010
- Socio-Economic Duty 2021
- Welsh Language Measure 2011 and Welsh Language Standards
- United Nations Convention on the Rights of the Child (UNCRC) & Rights of Children and Young Persons (Wales) Measure 2011
- Environment (Wales) Act 2016 – biodiversity and ecosystem resilience
- General Data Protection Regulation.

In addition, it is a requirement to consider and note impacts against the Council's commitment to become a net zero carbon local authority by 2030.

In addition, key service implications relating to the following areas will also need to be considered as part of undertaking the impact assessment in order to ensure key considerations are included in the development of any proposals:

- Legal and Risk Management
- Finance, Procurement, ICT and Physical Assets
- Staffing
- Marketing & Media.

Who?

1. Officers:

This Integrated Impact Assessment should be completed by Council officers to demonstrate that they have given 'due consideration' to all possible impacts and have identified mitigation measures to try and reduce any such impacts, in all proposals they put forward for the Council to consider. The Committee Front Sheet should be completed by Council officers when submitting such a proposal to Cabinet or Council for consideration and should reflect the key findings of the impact assessment.

2. Members:

Consideration of the findings of the integrated impact assessment allows County Councillors to demonstrate that they have given 'conscious consideration' to all possible impacts in their decision-making process ensuring mitigation measures are put in place to reduce possible impacts in all proposals they approve for the Council to implement.

When?

Integrated Impact Assessments are required for all strategic matters which are being presented to the Council for decision. This includes the following examples (not an exhaustive list) of strategic decisions:

- ✓ Setting objectives (for example, well-being objectives, equality objectives, Welsh language strategy)
- ✓ Changes to and development of public services
- ✓ Strategic financial planning
- ✓ Major procurement and commissioning decisions
- ✓ Strategic policy development
- ✓ Strategic directive and intent
- ✓ Strategies developed at Regional Partnership Boards and Public Service Boards which impact on a public bodies' functions
- ✓ Medium to long term plans (for example, corporate plans, development plans, service delivery and improvement plans)

The process of undertaking an Impact Assessment should begin as soon as a proposal starts to be developed. The Assessment should be refined and updated throughout the development of the proposal as further evidence and information is gathered and should support scrutiny of the proposal at the decision-making stage.

How?

- i. Begin to complete the Integrated Impact Assessment when you start developing your proposal.
- ii. As the proposal develops and refines keep a record of this process with amended and dated versions of the Impact Assessment. This will demonstrate how you have considered and responded to any additional information that has come out of the process.
- iii. When undertaking the impact assessment, you will be asked to note any positive or negative contribution the proposal may have and to refer to the evidence source/s used to identify that contribution. If you have identified gaps in evidence, please note those gaps as part of the assessment. Some examples of such evidence sources are as follows:
 - a. Research reports – academic publications or local comparative reports;
 - b. Welsh or National Government Legislation and Guidance;
 - c. National and local performance data;
 - d. Local population data including the Census figures;
 - e. National Survey for Wales data;
 - f. Feedback received from involvement and consultation with:
 - i. Individuals;
 - ii. Community and Voluntary Groups;
 - iii. Representative Groups (e.g. Disability Coalition, Equalities Carmarthenshire, etc.);
 - iv. Engagement networks (e.g. Youth Council, Ageing Well Network, Tenants Network, etc.);
 - v. Persons with lived experience of socio-economic disadvantage;
 - vi. Staff Forums and Trade Unions;
 - vii. Public and private sector partners; and
 - viii. Any other relevant stakeholders.

- g. Recommendations from the Council's scrutiny committees and/or advisory panels.
- iv. If referring to a specific source of information such as published evidence or statutory requirements list and (where possible) provide links to the relevant sources.
- v. You will also be asked to identify, where possible, who the proposal directly affects. When doing this think about the general public in terms of:
 - a. A specific geographical area
 - b. Specific demographic groups e.g. children and young people, older people, carers, road users, staff members, Welsh speakers etc.
 - c. Protected characteristic groups
- vi. Once your proposal is ready for decision by Council complete the Committee Front Sheet including a link to the latest completed Integrated Impact Assessment.

Consideration of the issues covered in the Integrated Impact Assessment should form an integral part of your proposal development process. The Integrated Impact Assessment acts as a physical support for evidencing this process.

Legislative Requirements

Well-Being of Future Generations (Wales) Act 2015

The Well-being of Future Generations Act (2015) is a law which is about improving the social, economic, environmental and cultural well-being of Wales. It means that we must do our work in a sustainable way and think about the impact our work can have for people living in Wales, now and in the future.

Five Ways of Working

In developing the proposal, you will need to ensure that due regard is given to the five ways of working and evidence of that consideration will need to be provided in the impact assessment.

Principle	Definition	Matters to consider
Long-term	The importance of balancing short-term need with the long term and planning for the future. Especially where things done to meet short term needs may have detrimental long-term effect	<ul style="list-style-type: none"> To be aware of, and address, the well-being of current and future generations whilst addressing the needs of the people you currently serve Look beyond the usual short-term timescales for financial planning and political cycles Consider the possible impacts of the proposal on a generational basis i.e., the next 10-25 years
Prevention	Understanding the root causes of the issues to prevent problems occurring or getting worse.	<ul style="list-style-type: none"> Consider how this proposal could prevent problems occurring or getting worse Consider how improving understanding of underlying causes of problems for people and communities can help find different solutions and ensure early intervention to prevent problems occurring rather than reacting to problems
Integration	Recognising relationships and interdependencies with other well-being goals and objectives of other service areas and partners. Consideration should be given to how: <ol style="list-style-type: none"> The body's well-being objectives may impact upon each of the well-being goals The body's well-being objectives may impact upon each other or upon other public bodies' objectives, in particular where steps taken by the body may contribute to meeting one objective but may be detrimental to meeting another 	<ul style="list-style-type: none"> Consider the impact on all of the well-being goals Consider the relationship, interdependencies and possible tensions between your service and others (internal or external to the Council) Consider if this proposal along with other recently agreed or pending proposal creates a cumulative impact on certain communities, characteristics, services, or partners Consider possible conflicting impacts on economic, social, environmental and cultural well-being Consider other proposals that may have an impact on this proposal in a positive or negative way

Principle	Definition	Matters to consider
Collaboration	Delivering by working with other internal and external partners (public, private or voluntary sector) to find shared sustainable solutions	<ul style="list-style-type: none"> • Consider if this proposal could be delivered by working with other Council services • Consider if this proposal could be delivered by working with other partners (public, private or voluntary sector) who have similar well-being objectives • If this is possible, please note how and what engagement has taken place with those partners to date
Involvement	The importance of involving those with an interest and seeking their views on decisions that affect them. Ensuring those involved reflect the diversity of the population of Carmarthenshire.	<ul style="list-style-type: none"> • Consider how you can involve people and communities in developing your proposal – this is at the heart of improving well-being currently and in the future • Consider if the people you have involved reflect the diversity of the population you serve <p>Has this proposal been discussed with:</p> <ul style="list-style-type: none"> ○ Local elected members ○ Town/Community Council ○ Relevant public, private or voluntary sector partner ○ Children and young people ○ Older people ○ Persons with protected characteristics ○ Staff representatives ○ Relevant Scrutiny Committee ○ Any other stakeholders <p>If so, please note those involved and provide a summary of their feedback</p>

Public Sector Equality Duty and the Equality Act 2010

The Public Sector Equality Duty requires the Council to have “due regard” to the need to:

- (1) Eliminate unlawful discrimination, harassment, and victimisation.
- (2) Advance equality of opportunity between different groups; and
- (3) Foster good relations between different groups.

In giving due regard, please consider how the proposal could positively contribute to a fairer society through advancing equality and good relations in day-to-day activities or could potentially have an adverse negative impact on this intention:

Protected Characteristic	Specifically
Age	<ul style="list-style-type: none"> • Children and young people up to 25 years old • Working age people • Older people
Disability	<ul style="list-style-type: none"> • Hearing impairment • Physical impairment • Visual impairment • Learning disability • Long-standing illness • Mental health • Other
Gender reassignment	
Race	<ul style="list-style-type: none"> • White • Mixed / Multiple Ethnic Groups • Asian / Asian British • Black / African / Caribbean • Black British • Other Ethnic Group
Pregnancy or Maternity	
Religion or non-beliefs	<ul style="list-style-type: none"> • Christian • Buddhist • Hindu • Humanist • Jewish • Muslim • Sikh • Non-belief • Other
Sex	<ul style="list-style-type: none"> • Male • Female
Sexual Orientation	<ul style="list-style-type: none"> • Bisexual • Gay Men • Gay Women / Lesbian • Heterosexual / Straight

Welsh Language Measure 2011 and Welsh Language Standards

The Welsh language standards (88-93) require the Council to:

‘Consider what effects, if any (whether positive or adverse), the decision would have on:

- a) Opportunities for persons to use the Welsh language, and*
- b) Treating the Welsh language, no less favourably than the English language’*

You are asked to consider the following points to support the aim of increasing the use of Welsh:

- Enabling and empowering Welsh speakers and learners to use their Welsh in everyday life, having access to services in Welsh, being able to learn and improve their Welsh language skills, planning and ensuring appropriate access to quality education and training through the medium of Welsh, making sure that our communities are places where the Welsh language is used freely and frequently.
- Ensure compliance with the Welsh Language (Wales) Measure 2011 and the Welsh Language Standards - this includes the rights of Welsh speakers to use Welsh when dealing with us and for staff to use Welsh at work.
- Actively encourage and promote the use of our services in Welsh in order to see an increase over time e.g. hits on website, number of consultations in Welsh, use of simultaneous translation at meetings.

In relation to promoting the Welsh language, we ask you to consider the following points:

- How does the policy/project support the aim to increase the number of Welsh speakers in the county? How does it mitigate from any further reduction?
- How is the policy/project aligned with the Council's Welsh Language Promotion Strategy?
- Which national objectives of A living language, a language for living, does this initiative fit?
- How are you planning on empowering and encouraging people to use Welsh when engaging with you on this policy/project?

Further information can be seen on the Welsh Language Commissioner’s website:

<http://www.comisiynyddygydraeg.cymru/English/ReportsGuides/Publications/Pages/PublicationDetails.aspx?PublicationId=fd551646-58c5-45b2-9bbc-2b4504b1da9b&Year=2020>

Socio-Economic Duty

The key aim of the Socio-Economic Duty is to encourage better decision making and ultimately deliver better outcomes for those who are socio-economically disadvantaged.

The Socio-economic duty requires relevant public bodies, when taking strategic decisions, to seek to reduce inequality of outcome as a result of socio-economic disadvantage. The duty should be used to ensure that reducing inequalities of outcome now and for future generations is a central factor in decision-making. Organisations should consider current inequalities and future trends when deciding how they can have the most impact. And organisations must be guided by the voices of socio-economically disadvantaged people in doing this.

Further information can be seen via the Welsh Government website: <https://gov.wales/socio-economic-duty>

United Nations Convention on the Rights of the Child (UNCRC)

Every child has the right to survival, protection, education, and to have their voice heard. These and many other fundamental children's rights are outlined in the [United Nations Convention on the Rights of the Child](#) (UNCRC). The UNCRC is a legally binding international agreement setting out the civil, political, economic, social and cultural rights of every child, regardless of their race, religion or abilities.

In 2015, Carmarthenshire County Council formalised its commitment to the Convention to ensure the Council delivers on its statutory and moral obligations of the four general principles of the Convention. The four principles ensure that all children and young people

- are not discriminated against
- have their best interests protected?
- have the right to life, survival and development.
- are involved in decision making by having the right to express their views and have them given due weight, taking into account their age and maturity.

You are required to show that consideration has been given and you have assessed (and where necessary, addressed) the impacts of proposed decisions on (the rights of) children and young people up to the age of 25 years old.

For more information you can contact the Participation Team on participation@carmarthenshire.gov.uk

Environment (Wales) Act 2016 Part 1 – Section 6 - The Biodiversity and Resilience of Ecosystems **Duty: reporting guidance for public authorities**

1. The Section 6 duty requires that public authorities “must seek to maintain and enhance biodiversity so far as consistent with the proper exercise of their functions and in doing promote the resilience of ecosystems”. To comply with the S6 duty public authorities should embed the consideration of biodiversity and ecosystems into their early thinking and business planning, including policies, plans, programmes and projects, as well as their day-to-day activities.”
2. Further information on the approach in Carmarthenshire is outlined in the Council's Environment Act Forward Plan.

The Welsh Government guidance to Environment Act reporting identifies the following scenarios as being relevant to how an organisation's reporting on their Environment Act Section 6 duty. This list is indicative, not comprehensive:

- Occupying a building or land, or being able to influence the management of a building or land
- Having influence on the management of buildings or land beyond their ownership.

In such instances an organisation is expected to consider the following with reference to biodiversity and ecosystem resilience:

- impacts of its management,
- procurement of services relevant to that building or land,
- its sustainability agenda,
- opportunities for awareness raising, training and education,
- partnership working where this impacts on biodiversity and ecosystem resilience.

Additional areas where consideration of the Section 6 duty is likely to be relevant includes:

- Wider issues relating to the procurement of goods and services, and the impact of this on biodiversity
- Communications, raising awareness, training and education, particularly where the subject relates to building to land management

- Governance

What is Biodiversity?

Biodiversity refers to the diversity of life on earth. Diversity of habitat, species and genetic diversity are included in this definition.

What is ecosystem resilience?

Ecosystem resilience considers the ability of an ecosystem to be resilient to change, e.g., climate change, or change relating from another form of damage or direct loss. In assessing the resilience of an ecosystem, we are considering the following:

- Diversity – what mix of habitat and species does it contains?
- Extent of the ecosystem – how large is it?
- Condition – how well is it managed, how well is it functioning as an ecosystem, is it supporting diverse variety of habitats and species?
- Connectivity - how well is it connected with other habitats that are of value to biodiversity?
- Adaptability - how adaptable is it to environmental change

For further information see [The State of Natural Resources Report](#), Chapter 4 resilient Ecosystems (Natural Resources Wales. 2016)

How do I assess whether it is appropriate for a proposal to Council to make reference to the Environment Act?

Generally, it will be proposals that relate to some impact on land or land management e.g. highway verge management, proposals that relate to any development or management of previously developed land or a previously undeveloped land, land management of any type for which the Council is responsible.

How do I ensure that a project I am reporting to Council addresses the Section 6 duty?

The key question to ask is “Could this proposal to which I am referring to Council be carried out in such a way as to be of benefit to biodiversity, or has it been designed to minimise any impact on biodiversity? If unable to answer this question confidently, they are advised to seek advice from the Rural Conservation Section in the planning division which oversee CCC’s response to its Section 6 Biodiversity Duty, and its Environment Act Forward Plan.

Climate Change

The Council is committed to tackling climate change and acknowledge that we have a significant role to play in both further reducing our own greenhouse gas emissions and providing the leadership to encourage residents, businesses and other organisations to take action to cut their own carbon footprint. We also have a responsibility to ensure we anticipate the risks and impacts arising from climate change and adapt accordingly to ensure we are well prepared. The goal is to reduce the vulnerability of Carmarthenshire to the harmful effects of climate change, in both the short and long term. We need to: (a) reduce our emissions through both decarbonisation, and (b) adapt to the impacts of climate change by increasing our resilience.

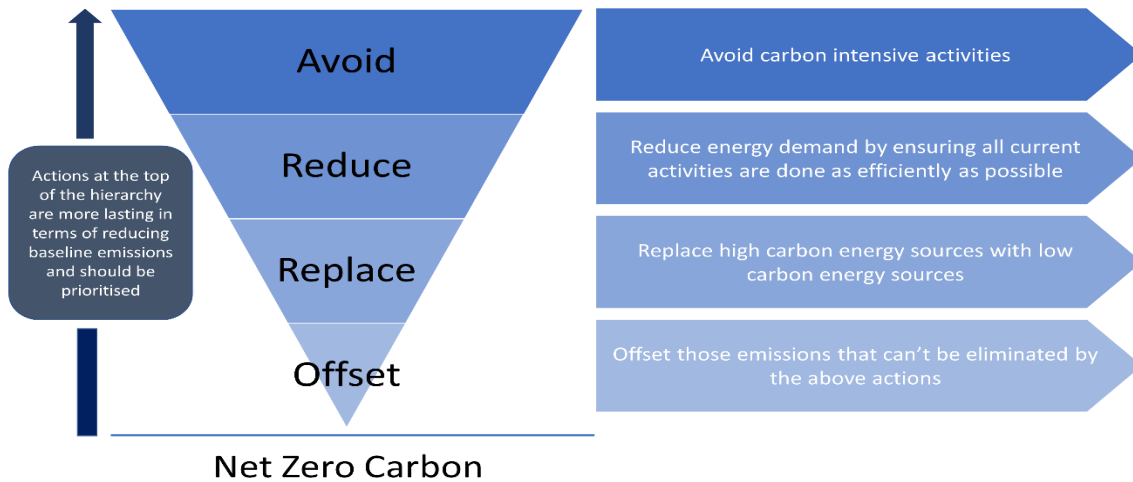
(a) Decarbonisation

On 12th February 2020 the County Council approved its [Net Zero Carbon \(NZC\) Plan](#), which outlines the Council’s approach to reaching net zero carbon by 2030. The scope of the Council’s carbon footprint includes energy consumption from:

- Non-Domestic Buildings
- Street Lighting
- Business Mileage

- Fleet Mileage

The 'net' in net zero carbon allows for our residual carbon footprint to be compensated / offset by the generation of renewable electricity and through carbon sequestration, via tree planting and other green infrastructure. However, we continue to pursue the carbon mitigation hierarchy approach as we do not consider compensation / offsetting as a 'get out clause' for reducing our carbon footprint.



In order to meet our ambitious and important targets, we need to look across the Council to consider how the effects of all our work will impact on our carbon footprint.

To help consider the impacts of your proposal on the Council's commitment to become net zero carbon by 2030, it would be useful to think about whether your proposal, either directly or indirectly impacts on:

- Council assets and infrastructure
- Energy demand and use
- Staff travel / use of fleet transport
- Council owned land use and/or management

In addition to this, you should also consider wider climate change, such as any direct / indirect impacts on:

- Water supply and treatment
- Procurement of goods and services
- Generation of waste

Any positive impacts should also be identified, such as opportunities for energy reduction, the provision of low carbon / renewable technology or increasing tree cover / green infrastructure.

Please refer to the Council's [Net Zero Carbon plan](#) for more information or consult with Carbon Reduction Officer or Sustainable Development Manager.

(b) Adaptation

Whilst we have made a commitment to reduce our carbon footprint, we also have a responsibility to consider the existing impacts of climate change, which comes under the umbrella of Climate Change Adaptation. Adapting to climate change means being prepared for effects such as increased temperatures, stronger winds, rising sea levels and more rain. Under the [Climate Change Strategy for Wales](#), Welsh Government has prepared a [Climate Change Adaptation Delivery Plan](#).

To ensure our commitments to climate change adaptation are being considered in any proposals needing an impact assessment, please identify whether your proposal will help, or has the potential to help, mitigate the effects of climate change or, alternatively, exacerbate them. Consideration should be given (but is not limited) to:

- Coastal/surface water flood risk and drainage
- Water availability
- Water/soil quality
- Land use and Green Infrastructure

Data Protection

The General Data Protection Regulation came into force on 25th May 2018 and includes a legal requirement to undertake Data Protection Impact Assessments (DPIAs).

A DPIA must be carried out when:

- Using new technologies; and
- The processing of personal data is likely to result in a *'high risk to the rights and freedoms of individuals'*.

Personal data has a very wide definition and includes any information relating to an identified or identifiable individual.

The term *'processing'* includes any action performed on personal data such as its collection, recording, storage, alteration, disclosure and destruction.

Processing likely to result in a *'high risk'* would include, but is not limited to:

- Large scale, systematic monitoring of public areas using a new CCTV system.
- Combining large databases, involving personal data being shared with other organisations.
- Large scale processing of sensitive personal data, such as information about health or criminal convictions.

In practice, it may be difficult to establish whether your proposed activity actually requires a DPIA. In such cases, please contact the Council's Data Protection Officer for advice.

This will enable any other Data Protection requirements to be identified, such as completing a Data Processing Agreement when using a third party to process Council data.

Please also note that it is not a requirement to undertake DPIAs for any processing activities which are already being carried out – DPIAs are a legal requirement to cover *relevant*, new activities. Therefore, there is no obligation to undertake retrospective DPIAs.

More information on Data Protection legislation can be found on the Information Commissioner's Office website, www.ico.org.uk